



Methodology document for Seqirus UK

11th May 2020



Statement for the disclosure of 2019 data during the COVID-19 pandemic in 2020

As part of the pharmaceutical industry's annual disclosure of transfers of value to HCPs, ORDMs and HCOs via the Disclosure UK platform and in order to ensure accuracy of the published data, the ABPI writes to all of the HCPs, ORDMs and HCOs named in companies' disclosure data ahead of its publication on Disclosure UK at the end of June. (Over 20,000 in June 2019.)

Given the unprecedented pressure on the NHS and health care professionals in responding to the COVID-19 pandemic, in April 2020 the ABPI and PMCPA agreed that it would not be appropriate for industry to write to HCPs, ORDMs or HCOs to request that disclosure data be reviewed. Doing so would add additional work for NHS professionals at this time. To avoid this, and in-line with guidance provided by the ABPI, Seqirus's 2019 transfer of value data has been published on Disclosure UK in aggregate.

Commitment to transparency

The pharmaceutical industry is committed to preserving the integrity of Disclosure UK and transparency in our interactions with HCPs, ORDMs and HCOs. The ABPI continues to explore how the full disaggregated 2019 data can be submitted to Disclosure UK in line with data from previous years.



Introduction

This core methodology note provides guidance on the Seqirus-specific decisions that relate to how we collect, aggregate, and report disclosure data relating to:

- Individual healthcare professionals (HPCs)
- Healthcare organizations (HCPs)

This not outlines the global position from Seqirus in relation to the EFPIA Disclosure Code. Practice in each country affiliate will depend on local laws and requirements of the local industry code.

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Section 1:

Data collection and reporting

- Company-specific decisions on how we gather, analyze, and report data

Item	Seqirus decision
Tax and VAT	We will publish the total Transfer of Value paid by Seqirus, or its 3 rd Party Contractor, including VAT where applicable
Transfer of Value dates	<p>We will disclose payments and TOV based on the data on the reporting period within which the TOV was made.</p> <p>For example, this is:</p> <ul style="list-style-type: none"> • The date payment was made to the recipient by check or wire transfer, such as fees paid, grants, donations, and sponsorship <p>Or, where a payment is not directly made, such as:</p> <ul style="list-style-type: none"> • The date the TOV took place, e.g. for an event an HCP participated in, their travel and accommodation
Transfer of Value when a contract extends over several years	Where a contract with an HCP or HCO runs for a number of years, we would publish the actual payment made during the relevant reporting period.
Transfer of Value if the HCP does not attend or an event is cancelled	<p>We will only attribute any TOVs that are incurred and can be reasonably associated to the HCP.</p> <p>In the circumstances when a flight or accommodation is booked but the event is cancelled, or the HCP does not attend, no TOV will be attributed to that HCP.</p>
Cross-border Transfers of Value	<p>We collate all cross-border TOV to HCPs and HCOs</p> <p>We report the transactions in the disclosure report for the country where the recipient has its principal practice in Europe</p>
Currency	<p>All payments and TOV will be disclosed in local currency.</p> <p>If the original payment is made in another currency, it will be converted using the Seqirus-approved exchange rate applicable at the time the payment or TOV was made.</p>



Section 2: Managing Consent	<ul style="list-style-type: none"> • How we manage the disclosure consent process for Healthcare Professionals (HCPs) and Healthcare Organizations (HCOs)
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Consent action	Seqirus decision
Consent status	<p>We will only collect data that is:</p> <ul style="list-style-type: none"> • Allowed to be collected according to data privacy law • Explicitly provided by and HCP or HCO for disclosure purposes <p>Before disclosure, all HCPs (and HCOs where applicable) will be informed of our Disclosure Code policy and asked to provide consent. This will be transparently worded in a consent statement or contract.</p> <p>We require all HCPs to provide their consent to us for publishing any details of any TOV they receive from us.</p> <p>If this consent is denied, we will only publish the total value of the TOV without specifying the name of the recipient.</p>
Managing partial of unknown consent	<p>Consent requirements vary between countries.</p> <p>In general, we will only disclose the TOV value under the individual section of the disclosure report if the HCP gives his/her consent for reporting on all TOV.</p> <p>In all other cases, we will aggregate the total amount of the TOV where:</p> <ul style="list-style-type: none"> • An HCP only gives partial consent to publication • We do not receive written notification of consent for all TOV
Revocation of consent	<p>Consent requirements vary between countries.</p> <p><u>Before the disclosure report is published</u></p> <p>If an HCP revoked his/her consent before the report is published, we will update the data and include the TOV in the aggregated section of the disclosure report.</p> <p><u>After the report is published</u></p> <p>If the HCP revoked his/her consent after the report is published, we will update the information at the first reasonable time.</p>
Number of individuals who have agreed to TOVs being disclosed and number in aggregate	<p>For 2019 data, 20 HCPs have agreed to TOVs being disclosed individually, and 8 are disclosed in aggregate, so 29% of HCPs are in aggregate. No HCPs have disclosed some TOVs individually and some in aggregate, as we will only disclose the TOV under the individual section of the disclosure report if the HCP gives his/her consent for reporting on all TOVs.</p>



<p>Section 3: Managing report submission</p>	<ul style="list-style-type: none"> • How and where we report disclosure
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Reporting action	Seqirus decision
Disclosure method	We will publish disclosure report for Seqirus UK on the ABPI Disclosure portal – https://portal.disclosureuk.org.uk
Disclosure period	Each reporting period will cover a full calendar year, unless the local association sets a different period.
Retention period – public	The disclosure report will remain in the public domain for at least three (3) years.
Retention period – record-keeping	We will ensure that all the TOV required to be disclosed must be documented and retained for a minimum of five (5) years after the end of the relevant reporting period, unless a shorter period is required under applicable national data privacy or other laws or regulations.



Section 4: Categories for disclosure	<ul style="list-style-type: none"> • Which types of payment of Transfer of Value are included in our disclosure report
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Donations, grants, R&D, fees for service and consultancy

Description	Types of Transfer of Value involved
Donations and grants to HCOs	Donations and Grants to HCOs that support healthcare, including donations, grants, and benefits in kind, to institutions, organizations, or associations that: <ul style="list-style-type: none"> • are comprised of HCPs And/or <ul style="list-style-type: none"> • provide healthcare
Fees for service and consultancy - Fees	TOV Resulting from or related to contracts between member companies and institutions, organizations, associations, or HCPs under which such institutions, organizations, associations or HCPs provide any type of services to Seqirus, or any other type of funding not covered in the previous categories. For example: <ul style="list-style-type: none"> • Speaker fees • Speaker training • Data analysis • Development of educational materials • General consulting/advising
Fees for service and consultancy <ul style="list-style-type: none"> • Related expenses agreed in the fee for service of consultancy contract 	Related expense agreed in the fee for service or consultancy contract. For example: <ul style="list-style-type: none"> • Fees for airfare, train, boat, or ferry (including booking fees) • Car rental, care service, taxi transfers • Parking fees • Petrol • Tolls
Research and development (Disclosed at an aggregate level)	Research and development TOV to HCPs/HCOs associated with: <ul style="list-style-type: none"> • Non-clinical (good laboratory practice [GLP]) • Clinical trials in Phase I to Phase IV • Investigator-sponsored studies • Non-interventional studies



Donations, grants, R&D, fees for service and consultancy

Description	Types of Transfer of Value involved
Contribution to costs of events (as per HCP code): 1. Sponsorship agreements	Events include: <ul style="list-style-type: none"> • All scientific professional meetings, congresses, conferences, symposia and other similar events • Sponsorships with HCOs/third party appointed by and HCO to manage and event For example: <ul style="list-style-type: none"> • Rental of booths at an event • Advertisement space (in paper, electronic, or other format) • Satellite symposia at a congress • Sponsoring of speakers/faculty • Drinks of meals provided by the organizers (where included in the Sponsorship Agreement) • Courses provided by and HCO (Where Seqirus does not select the individual HCPs participating)
Contribution to cost of events: 1. Registration fees	Registration fees related to attending a congress or symposia
Contribution to cost of events: 2. Travel and accommodation	Travel in relation to attending a congress or symposia Accommodation in relation to attending a congress or symposia For Example: <ul style="list-style-type: none"> • Fees for airfare, train, boat, or ferry (including book fees) • Car rental, car service, taxi transfers • Parking fees • Petrol • Tolls



Section 5:

Definitions

- List of key terms

Term	Definition
Healthcare Professional (HCP)	<p>Any person that:</p> <ul style="list-style-type: none"> • Is a member of the medical, dental, pharmacy, or nursing professions • While carrying out his or her professional activities, may prescribe, purchase, supply, recommend, or administer a medicinal product • Works with their primary practice, principal professional address, or place of incorporation in Europe
Healthcare Organization (HCO)	<p>(i) A healthcare, medical, or scientific association or organization (irrespective of the legal or organizational form) such as a hospital, clinic, foundation, university, or other teaching institution or learned society (except for patient organizations within the scope of the PO Code)</p> <p>(ii) With a business address, place of incorporation, or primary place of operation in Europe</p> <p>OR</p> <p>(iii) Through which one or more HCPs provide service</p>
Transfer of Value	<p>Direct and indirect TOV, whether in cash, in kind, or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of generic or branded prescription-only medicinal products exclusively for human use.</p> <p>Direct TOV are those made directly by Seqirus for the benefit of a recipient</p> <p>Indirect TOV are those made by a third party on behalf of Seqirus for the benefit of a recipient, for example travel or accommodation to an event organized by and external agency.</p>

Full definitions can be found in the EFPIA Disclosure Code, Section 6.



Section 6: Sources of further information	<ul style="list-style-type: none">• Resources from EFPIA [Insert your local code if required]• Your local Seqirus contact
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Resources from ABPI

Support relating to the Disclosure Code is regularly updated on the website of The Association of the British Pharmaceutical Industry (ABPI):

- www.abpi.org.uk

How we can help at Seqirus

For specific questions relating to this year's report and process	<ul style="list-style-type: none">• Contact your country's transparency department Andrea Jenner (andrea.jenner@seqirus.com) or transparency.reporting@seqirus.com
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