

Proveca Ltd. Transfer of Value Disclosure 2020

Methodological Note

Introduction

Proveca Ltd. engages healthcare professionals (HCPs), other relevant decision makers (ORDMs), healthcare organisations (HCOs) and patients' organisations across Europe to obtain independent and expert advice to ensure high standards of patient care. Such engagements include but are not limited to research and development, educational and training events, advisory board meetings and attendance at conferences including promotional activities.

Proveca Ltd. has agreed to comply with the ABPI Code of Practice to document and publicly disclose payments or other transfers of value made directly or indirectly to HCPs, ORDMs and HCOs. This note describes Proveca Ltd's method of disclosure of Transfer of Value (ToV) for 2020 in accordance with the requirements of the ABPI code.

In 2020, we chose to review all payments made by our UK team to external sources. The relevant payments for disclosure, as per the ABPI 2019 Code of Practice, were identified. These payments were reviewed and all the invoices for these payments reviewed and added appropriately to the supplied Disclosure UK spreadsheet provided. The spreadsheet was checked for validation appropriately prior to submission.

With regards to contracts, the ToV in this disclosure only relate to one-off contracts in which Proveca's obligation to comply with the ABPI code is clear.

Currency aspects and Value Added Tax (VAT)

The predominance of all ToV were made in Pound Sterling (£). Where ToV were made in Euros (€), amounts were converted to Pound Sterling (£) based on currency conversion (0.86199818) on the date which the conversion calculation was made on 24 March 2021. No other currencies were used for ToV in 2020.

For payments made to HCOs, payments are declared in Pound Sterling (£) and values disclosed do not include VAT.

For payments made to HCPs, payments are declared in Pound Sterling (£) and the values disclosed are the full payment.

Consent for individual vs. aggregate reporting

Direct ToV:

Regarding disclosure of payments for direct transfers of value, HCPs were provided with a contract and the following ABPI guidance documents in order to make a decision: Disclosure UK GDPR Factsheet (REP-0120-0119) and HCPs: Step up to Disclosure UK (REP-0122-0220). HCPs were asked to inform us of their decision whether to have their payments publicly disclosed or not. All HCPs responded with a decision, which we respected and followed. In the event that a HCP declined to give, or subsequently withdrew consent to report, all ToV made to that HCP were disclosed in an aggregate form. For these ToV 66% of the HCPs agreed for disclosure.

Indirect ToV:

Regarding disclosure of payments for indirect transfers of value, there was no robust system in place to allow HCPs to provide consent to disclose the payments. This is because payments were arranged through events-planning companies for a series of advisory boards held in a non-UK, EU territory. This is because payments were arranged through events-planning companies for a series of advisory boards held in Italy. This was a new method of performing advisory boards for Proveca. All advisory boards approvals were processed via Proveca SOPs and signed off by registered company signatories as per the expectation of the ABPI code of practice. Proveca will develop a system to allow HCPs to provide consent to disclose indirect ToV for future disclosures.

Categories of disclosure

Registration Fees; Registration fees paid by Proveca to or on behalf of a HCP associated with their attendance at national or international educational meetings, conferences or courses.

Travel & Accommodation; Costs associated with travel, subsistence and accommodation agreed as part of sponsorship paid to or on behalf of a HCP associated with their attendance at national and international educational meetings, conferences or courses.

Fees; including speaker honoraria, consultancy fees, fees for market research or advisory activities carried out by HCPs or HCOs for or on behalf of Proveca.

Related Expenses; Travel costs and subsistence incurred by a HCP while carrying out engagements on behalf of Proveca or agreed as part of their sponsorship.

Donations, grants and benefits in kind; following a written request, a 'donation' is a contribution made towards the work or fund-raising activities that a HCO carries out independent of Proveca.

Following a discussion or a request from a HCO, a 'grant' is a contribution to some, or all, of the costs of an activity that a HCO carries out independent of Proveca.

Following a request or discussion with a HCO, 'a benefit in kind' is the provision of a service, benefit, technical or administrative input given to a HCO as an alternative to a financial contribution (donation or grant); the approximate cost of the benefit in kind (the cost the HCO would reasonably expect to pay) is the value of the ToV recorded.

Contribution to the cost of an event; this may include sponsorship or support for the running of an event by an organisation independent to Proveca.

Sponsorship is the provision of financial support to a HCO as part of running an event, in return for the opportunity to present our material as per the ABPI Code of Practice.

Non-monetary ToV

There were no non-monetary ToV made to other relevant parties in 2020.

Joint working ToV

There were no joint working agreements in 2020.

Research and Development ToV

Transfers of Value to HCPs or HCOs related to Research and Development were disclosed in an aggregate fashion and as required by Clause 23.2 of the ABPI Code of Practice.