



September 2024

Disclosure UK gateways | Members of the public and patient organisations

1. What are the Disclosure UK gateways?

Under the ABPI Code of Practice, disclosure information related to activities with patient organisations (PO) and members of the public (MoP) are published on individual pharmaceutical company websites.

The Disclosure UK gateways publish a collection of hyperlinks to either patient organisation or members of the public disclosure information from pharmaceutical companies abiding by the ABPI Code of Practice.

The gateways enable visitors to the Disclosure UK database to guickly find and review the published information.

2. What is a patient organisation?

The 2024 ABPI Code of Practice definition means an organisation mainly comprised of patients and/or caregivers or any user organisation such as a disability organisation, carer or relative organisation and consumer organisation that represents and/or supports the needs of patients and/or caregivers - 2024 ABPI Code of Practice, Clause 1.15.

3. What information is being disclosed about patient organisations?

Since 2006, pharmaceutical companies have been required by the ABPI Code of Practice to publish information about their relationships with patient organisations on their own company websites.

The PO disclosure requirements are set out in the 2024 ABPI Code of Practice, Clause 29. The PMCPA also provides additional guidance to support companies with their disclosure.

4. What information is being disclosed about members of the public?

The information about members of the public, including patients and journalists, is published in aggregate on individual company websites and started with 2022 data published in 2023.

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The MoP disclosure requirements are set out in the <u>2024 ABPI Code of Practice</u>, <u>Clause</u> <u>30</u>. The <u>PMCPA also provides additional guidance</u> to support companies with their disclosure.

5. Why did the ABPI launch the Disclosure UK gateways?

The ABPI is committed to improving transparency and has evolved its disclosure requirements over time. The ABPI wanted to increase accessibility to industry's patient organisation and members of the public disclosure information. The patient organisation gateway launched in June 2021, and the members of the public gateway in June 2023 inline with the first year of disclosure requirements for members of the public recipients. This means that those looking for details about pharmaceutical companies working with those recipient types have a central place to find information.

6. Why was the members of the public gateway launched later?

The requirement to publish information about transfers of value to members of the public on company websites was introduced in the 2021 ABPI Code of Practice, commencing with 2022 data published in 2023.

7. Why isn't this information incorporated into Disclosure UK in the same way as the information about healthcare professionals and healthcare organisations?

The gateways increase the accessibility of this information and are now a mandatory requirement in the 2024 ABPI Code, for transfers of value made in 2024 and publicly disclosed in 2025, and for each calendar year thereafter. Improving transparency is important to us and the ABPI Code of Practice and its Principles will continue to evolve to achieve this.

8. Do companies need permission to share a link to this information via Disclosure UK?

Patient organisation disclosures are already deemed as public information, and the gateway is simply sign-posting visitors to where it can be found.

Members of the public disclosures are published in aggregate on company websites therefore a legal basis under the GDPR is not required to make this information public, nor sign-post to it.



9. Is providing links via the Disclosure UK gateways mandatory for pharmaceutical companies?

Providing a link to disclosure data via both gateways is now mandatory. This requirement was brought in under the 2024 ABPI Code for transfers of value made in 2024 and publicly disclosed in 2025, and for each calendar year thereafter. The link should take visitors from Disclosure UK to the relevant disclosure information published on the company's website. Please see Clauses 29 and 30 and its supplementary information for further details.

Supplying gateway links to 2023 disclosure information or earlier was not a mandatory requirement under the previous (2021) ABPI Code, although providing them was supported by the ABPI Code principle on Transparency, and a recommendation strongly backed by the ABPI Board.

While provision of links was previously optional, the ABPI expected all companies signed up to the ABPI Code of Practice to work towards providing their links via the Disclosure UK gateways, unless they did not work with patient organisations or members of the public, and therefore had no information to publish. Provision of links is now mandatory under the 2024 ABPI Code.

10. What if a company does not have any patient organisation or members of the public disclosures?

The gateways will only display names of companies who have provided a link. It will <u>not</u> show names of companies without this data and have therefore not provided a link.

11. Are the Disclosure UK gateways open to all pharmaceutical companies?

The gateways can be used by any company formally abiding by the ABPI Code of Practice. Companies without HCP/HCO disclosures should contact <u>info@disclosureuk.org.uk</u> to request access to the private disclosure portal to use the gateways.

Companies not currently covered by the ABPI Code of Practice should contact <u>info@pmcpa.org.uk</u> for more information about signing up as a non-member company, or <u>membership@abpi.org.uk</u> for information about becoming a member of the ABPI.

