

AUSTRALIA TRANSPARENCY UPDATE

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DISCLAIMER

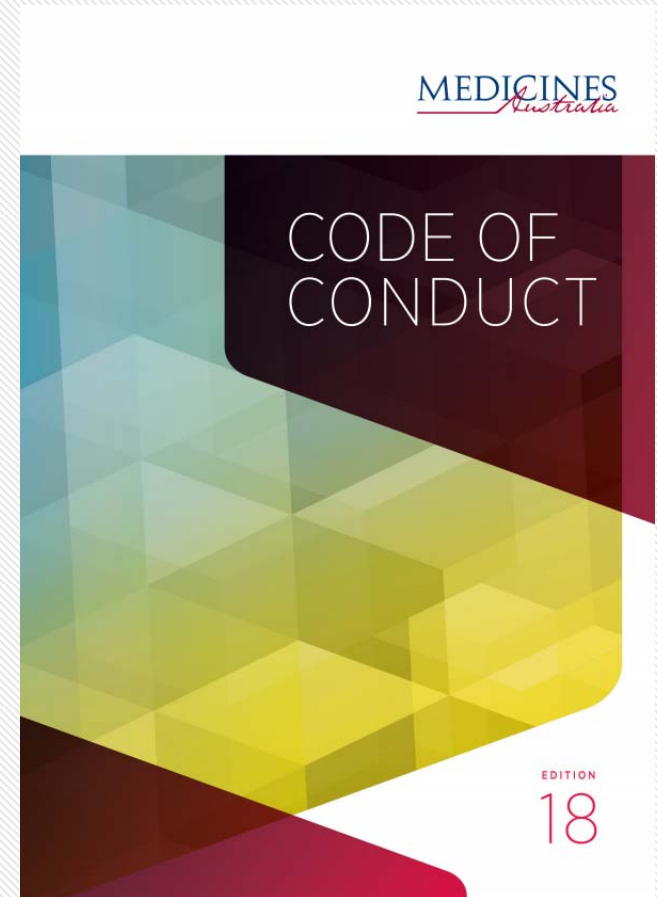
- The views and comments I will present are of my own and do not reflect the views of my employer Sanofi or any other company.

New Code of Conduct

New 18th Edition released in April 2015 with new transparency disclosure requirements.

Governs all interactions and promotional activities with healthcare professionals and healthcare organisations.

From 1st October 2015, all Medicines Australia member companies will be required to collect and report payments and transfer of values to healthcare professionals.



What activities are reportable?

The new Code requires reporting of:

- **Payments for the provision of services** by a healthcare professional (e.g. speaking honoraria, fees for providing advice as an advisory board member)
- **Sponsorship of medical education** (e.g. sponsorship of travel and accommodation or registration fee to attend a meeting)

What HCP information will be reported?

Companies will be required to disclose the following details:

- Date of the event or provision of service
- Healthcare professional's name (no honorific)
- Type of healthcare professional (i.e. medical practitioner, pharmacist, nurse, dentist etc)
- Healthcare professional's principal practice address
- Description of the service (i.e. Speaker; Advisory Board member; Chairperson at educational meeting etc)

Challenges

- Ensuring all ToVs are captured and published correctly.
- Potential resistance from healthcare professionals.
- Privacy.
- Misinterpretation from Media or Public.
- Location of reports.

Two stages – Express Consent

1 Oct 2015 – 30 Sep 2016

- Healthcare Professionals are asked for their consent prior to engagement.
- Healthcare Professionals may choose to opt-out. Payments are then reported in aggregate with other healthcare professions who have chosen to opt-out.
- Healthcare Professionals may choose to give consent but opt-out prior to reporting.

Two stages – Reasonable Expectation

1 Oct 2016 – onwards

- Healthcare Professionals are made aware that by accepting any transfer of value that their personal information in relation to the transfer will be disclosed.
- Healthcare Professions cannot withdraw once they have already accepted.
- Current awareness program in place to inform Healthcare Professionals and ensure reasonable expectation.

Timeframes

- Reporting cycle of 6 months (except for the initial report 7 months)
- 1st report from 1 October 2015 from 30 April 2016.
- Report must be published within 4 months following the end of each reporting period.
- Must publish on company website and be available for 3 years from date of first publication.