

**Code/21/38**  
**8 June 2021**

**To: ABPI Members**  
**Companies which have agreed to comply with the Code**

Dear Sir/Madam

**Consultation on Amendments to the mandatory template for the 2021 ABPI Code**  
**(Consultation runs until Thursday, 17 June 2021)**

Proposals for amendment of the mandatory template for the 2021 ABPI Code of Practice for the Pharmaceutical Industry are enclosed. The 2021 ABPI Code was agreed in January 2021 and updated in April 2021. The proposed amendment to be considered at an ABPI General Meeting on 23 June 2021 is to the mandatory template. No changes are proposed to the Code itself. The ABPI Board supports the proposed amendment.

The consultation closes on Thursday, 17 June 2021 in order that the proposals can be considered at an ABPI General Meeting on 23 June 2021. Member companies of the ABPI will receive notice of that meeting shortly.

**Background**

Changes to the mandatory template were consulted upon last summer and following feedback changes were made including the addition of a new column to the template. Unfortunately, although a copy of the updated template was included in the relevant papers for the ABPI meeting in January 2021, the PMCPA did not specifically highlight this change with companies or the ABPI. I apologise for this error.

In recently reviewing the template in relation to possible changes to Disclosure UK and assessing the impact of the changes agreed in January 2021 on companies it transpires that the changes will have considerable impact both on companies and in relation to the need to make changes to Disclosure UK. Given that there may be other changes to disclosure which would mean changes in the structure of the template it is preferable to deliver all these changes to the template (and thus companies' processes and systems) at the same time.

The ABPI Board agreed that a new replacement template, using the version sent for the consultation in June 2020, with updates listed below but no structural changes ie without the new column should be developed and is attached. If agreed by ABPI members this would mean the structure of the template is the same as the template currently in operation (ie the one agreed for the 2019 Code). If the new template is agreed, then only minor changes to Disclosure UK and company processes will be needed.

## Differences between the proposed new template and the version consulted upon in June 2020

The differences between the proposed new template and the version sent for consultation are as follows and are mainly typographical corrections and updates for consistency.

**Heading** replace 'Clause 24.10' with 'Clause 28.6' to read 'METHODOLOGICAL NOTE (H) (Clause 28.6)'.

**S21 and S22** replace 'ditto' with 'link to executive summary (G)

**Note 3** replace 'Binleys' with 'Wilmington Healthcare', make one sentence and add 'otherwise this should' to read 'Unique ID would be an identifier from either Wilmington Healthcare or OneKey otherwise this should be left blank'.

**Note 4** replace 'the' with 'other' to read 'Payments to health professionals (HCPs) as defined in Clause 1.9, healthcare organisations (HCOs) as defined in Clause 1.8 and other relevant decision makers (ORDMs) as defined in Clause 1.13, has to be disclosed'.

**Note C** replace 'fees for service' with 'contracted services' to read 'Data relates to the column heading i.e contracted services

**Note D** replace 'fee for service' with 'contracted service contract or agreement' to read 'Data relates to the column heading ie related expenses agreed in the contracted services contract or agreement'

**Note F** add 'The methodological note must make clear the number of individuals who have agreed to some payments being disclosed individually and some in aggregate' to read 'Total number of individuals disclosing in aggregate. WARNING: this is not necessarily a sum of columns V, W, X and Y as individuals might appear in more than one category i.e. receive fees and expenses. The methodological note must make clear the number of individuals who have agreed to some payments being disclosed individually and some in aggregate.

**Note L** new to read 'Total percentage of individuals disclosing in aggregate.' Add a reference to cell AC18.

**Note M** new to read 'Sponsorship to a healthcare organisation or a third party organisation appointed by a healthcare organisation which is not related to events/meetings and which cannot be disclosed elsewhere on the template (ie is not considered to be a donation or grant or contracted service or related to collaborative working) should be included in this column and an explanation given in the methodological note'. Add a reference to cell U6.

Row 5, R-Y and Row 18 V- Y changed some wording to italics for consistency

K20-22 added square brackets

Row 23 amended clause number in text to Clause 1.8.

It has been made clear on the template which of the notes appear on the template and a date has been added.

\* \* \* \* \*

The attached document sets out the proposed mandatory template. The proposed amendments are supported by the ABPI Board.

It is anticipated that the wording will be before the ABPI General Meeting on Wednesday, 23 June 2021.

Please let me have any comments as soon as possible and by no later than Thursday, 17 June 2021.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'H Simmonds', written in a cursive style.

**Heather Simmonds**  
Director

Enc.