

# 2024 ABPI Code of Practice

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## INTRODUCTION



A public consultation on proposals to update the ABPI Code and the PMCPA Constitution and Procedure was undertaken between December 2023 and February 2024.

All the responses were reviewed by the PMCPA.

# Thank you

**to all who provided in-depth feedback.**

This feedback is invaluable in ensuring the Code is as robust as possible.

Many comments received related to areas that were not consulted on – this feedback will inform the development of guidance and FAQs and the next Code update.

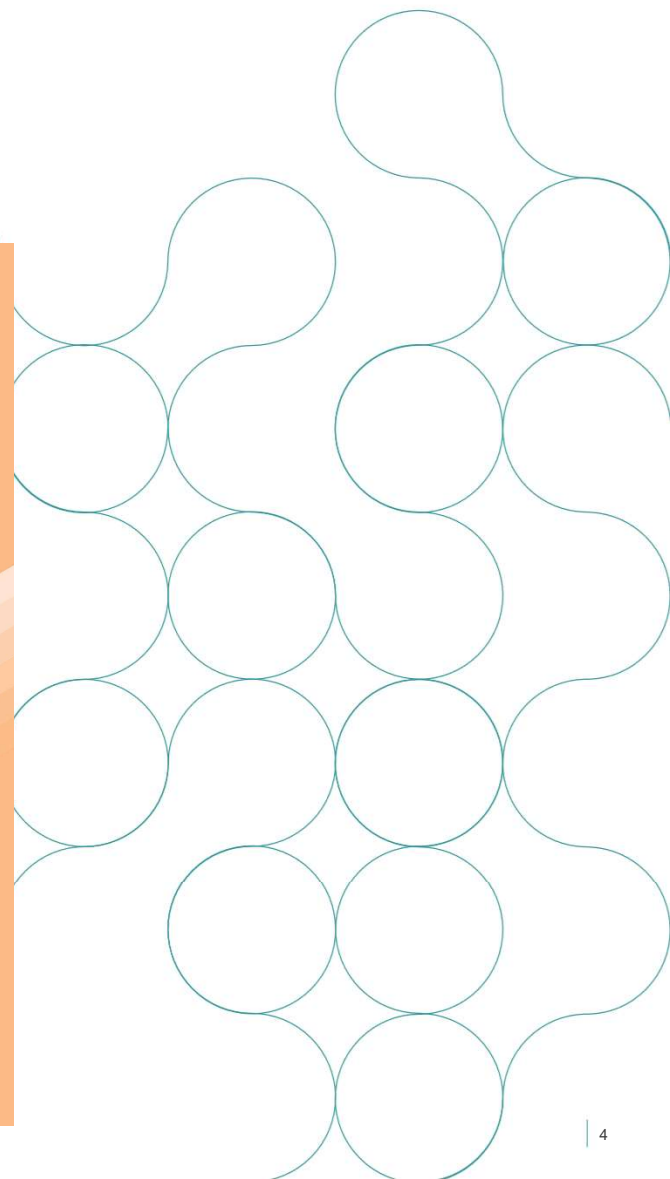
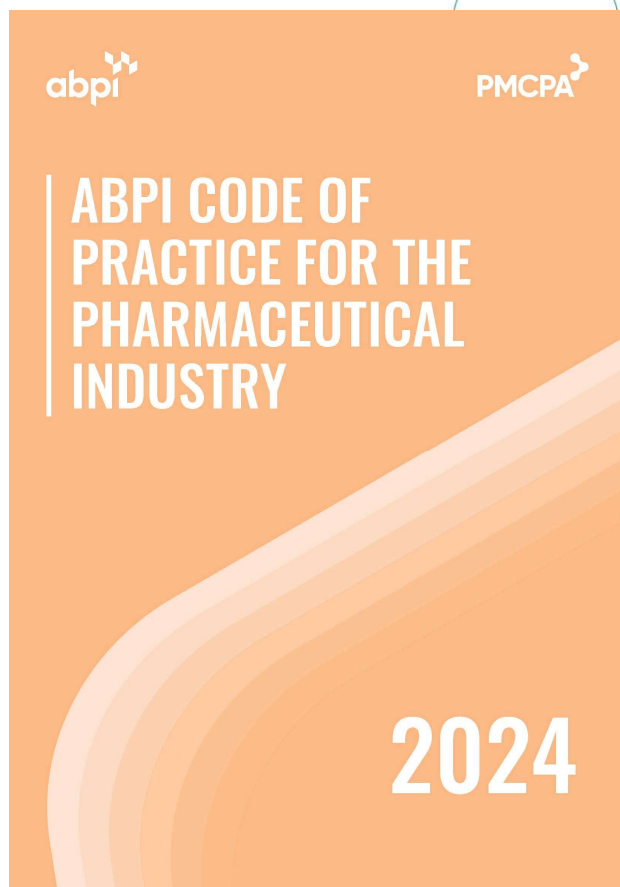


# What has changed?



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**Effective from  
1 October 2024**

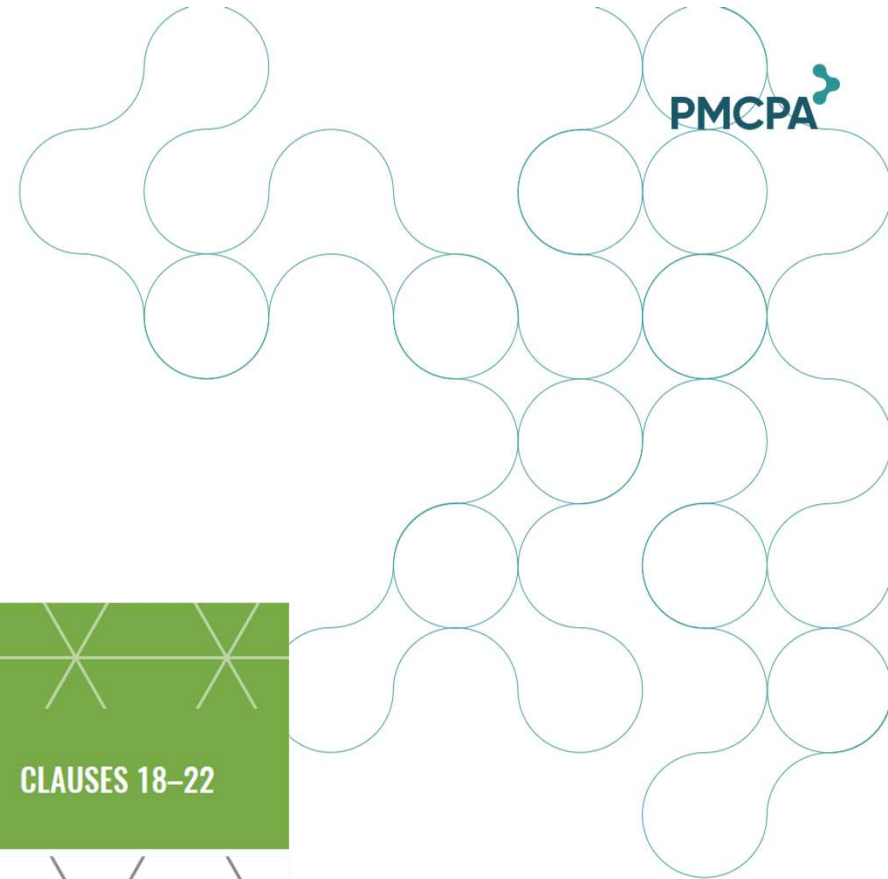


# Changes to the design

## Accessibility

- Patterns to aid navigation

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# Changes to the design

## Accessibility

- Patterns to aid navigation
- Reduced colour

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**Clause 30 Supplementary Information**

**Clause 30 (New) Disclosure of Contracted Services Provided by the Public, Including Patients and Journalists**

The arrangements for such services should meet the requirements of Clause 24.

Disclosure must be in the first six months in the calendar year following that in which the payments were made. The information which must be disclosed is the total amount paid in a calendar year to the public, including individual patients, journalists and members of the public who have provided services. The total number of individuals must be given. The names of the individuals need not be disclosed. Companies may, of course, give greater detail, for example, by giving separate figures for different categories of service or by providing details of the maximum and minimum payments etc.

A template to disclose the information required in relation to the public etc. is available from the PMCPA website [www.pmcpa.org.uk](http://www.pmcpa.org.uk). The use of this template is optional.

All reasonable steps should be taken by companies to similarly disclose their best estimates of fees paid to UK individuals by overseas officials, head offices in the UK or overseas and UK-based European offices.

**Clause 31**

**Timing, Duration and Retention of Disclosure Information**

**31.1** (24.4) Disclosures must be made annually in respect of each calendar year and must be in the first six months after the end of the calendar year in which the transfers of value/ payments were made.

**31.2** (24.5) The information disclosed must remain in the public domain for at least three years from the time of first disclosure.

**31.3** (24.6) Companies must document all disclosures and retain the records for at least five years after the end of the calendar year to which they relate.

**Clause 31 Supplementary Information**

**Clause 31.1 (New) Date of Implementation for Disclosure of Contracted Services Provided by the Public, Including Patients and Journalists**

The information required by Clause 30 must be publicly disclosed annually in respect of transfers of value made in 2022 and each calendar year thereafter.

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Clause numbers in brackets refer to the 2019 Code of Practice.



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**Clause 30 Annual Disclosure of Contracted Services Provided by the Public, Including Patients and Journalists**

**30.1** Companies must make publicly available annually details of the fees for certain contracted services paid to members of the UK public, including patients and journalists. These services include secondary care hospitals, assistance with travel, writing articles and/or publications, participating in advisory boards, advising on the design, etc. of clinical trials and participating in market research where such participation involves remuneration and/or travel. This information must be disclosed on the company website.

The disclosure for contracted services provided by members of the public in accordance with Clause 30, must include:

- the total number of members of the public, including patients and journalists, contracted to perform services and the total amount paid per calendar year; and a description of the types of services provided that is sufficiently complete to enable the reader to understand the nature of the services provided without the necessity to divulge confidential information.
- companies should provide a breakdown of the total payments to each group of individuals, i.e. the public, patients and journalists, without the necessity to divulge confidential information.
- fees and expenses should be disclosed separately.

Each company must include a note summarising the methodology used by it in preparing the disclosures and identifying support and services provided.

**Clause 30 Supplementary Information**

**Clause 30 Disclosure of Contracted Services Provided by the Public, Including Patients and Journalists**

The arrangements for such services should meet the requirements of Clause 24.

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A template to disclose the information required in relation to the public etc. is available from the PMCPA website [www.pmcpa.org.uk](http://www.pmcpa.org.uk). The use of this template is optional.

All reasonable steps should be taken by companies to similarly disclose their best estimates of fees paid to UK individuals by overseas officials, head offices in the UK or overseas and UK-based European offices.

**Clause 30.1 The Public, Including Patients and Journalists, Disclosure Method**

For transfers of value made in 2022 and public disclosure in 2023, and for each calendar year thereafter, companies should submit a link to the relevant Disclosure UK gateway. The link should include a return from Disclosure UK to the public, including patients and journalists, disclosure and a notice published on the company's website.

**Clause 31 Timing, Duration and Retention of Disclosure Information**

**31.1** Disclosures must be made annually in respect of each calendar year and must be in the first six months after the end of the calendar year in which the transfers of value/payments were made.

**31.2** The information disclosed must remain in the public domain for at least three years from the time of first disclosure.

**31.3** Companies must document all disclosures and retain the records for at least five years after the end of the calendar year to which they relate.

**Clause 31 Supplementary Information**

**Clause 31 Disclosure UK Timelines**

Information to be published on Disclosure UK must be submitted in line with the coordinated timelines of the platform. Details are available at [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk).

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# Changes to the design

## Accessibility

- Patterns to aid navigation
- Reduced colour
- Increased contrast between text and background in the supplementary information sections

**Clause 30 Supplementary Information**  
**Clause 30 (New) Disclosure of Contracted Services Provided by the Public, Including Patients and Journalists**  
*The arrangements for such services should meet the requirements of Clause 24.*  
*Disclosure must be in the first six months in the calendar year following that in which the payments were made. The information which must be disclosed is the total amount paid in a calendar year to the public, including individual patients, journalists and members of the public who have provided services. The total number of individuals must be given. The names of the individuals need not be disclosed. Companies may, of course, give greater detail, for example, by giving separate figures for different categories of service or by providing details of the maximum and minimum payments etc.*  
*A template to disclose the information required in relation to the public etc. is available from the PMCPA website [www.pmcpa.org.uk](http://www.pmcpa.org.uk). The use of this template is optional.*

**Clause 31**  
**Timings, Duration and Retention of Disclosure Information**  
**31.1** (24.4) Disclosures must be made annually in respect of each calendar year and must be in the first six months after the end of the calendar year in which the transfers of value payments were made.  
**31.2** (24.5) The information disclosed must remain in the public domain for at least three years from the time of first disclosure.  
**31.5** (24.6) Companies must document all disclosures and retain the records for at least five years after the end of the calendar year to which they relate.

**Clause 31 Supplementary Information**  
**Clause 31.1 (New) Date of Implementation for Disclosure of Contracted Services Provided by the Public, Including**  
the calendar year to which they relate.

**Clause 31 Supplementary Information**  
**Clause 31.1 (New) Date of Implementation for Disclosure of Contracted Services Provided by the Public, Including Patients and Journalists**  
*The information required by Clause 30 must be publicly disclosed annually in respect of transfers of value made in 2022 and each calendar year thereafter.*



**Clause 30 Supplementary Information**  
**Clause 30 Disclosure of Contracted Services Provided by the Public, Including Patients and Journalists**  
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*A template to disclose the information required in relation to the public, etc. is available from the PMCPA website [www.pmcpa.org.uk](http://www.pmcpa.org.uk). The use of this template is optional.*

**Clause 31 Supplementary Information**  
**Clause 31.1 Disclosure UK Timelines**  
*Information to be published on Disclosure UK must be submitted in line with the operational timelines of the platform. Details are available at [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk).*

# Changes to the design

## Digital first

- Read the Code online or download a PDF
- Clickable navigation tabs at the top of each page of the PDF
- Reduced amount of colour to make it easier to print at home from the PDF
- An initial allocation of printed copies will still be made available



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## Timelines and next steps

### **1 October 2024:**

The 2024 ABPI Code comes into operation

### **1 October 2024 to 31 December 2024:**

During this period, no material or activity will be regarded as being in breach of the Code if it fails to comply with its provisions only because of requirements which this edition of the Code newly introduces.

The new template for disclosure should be used to submit the 2024 data to Disclosure UK by **14.00 GMT Friday, 28 March 2025**.

### Companies should:

- Familiarise themselves with the changes to the Code and associated materials
- Encourage relevant staff to view these webinars outlining the changes to the Code
- Update relevant policies and procedures and train staff
- Ensure that materials and activities that do not meet the requirements of the 2024 Code are withdrawn before 1 January 2025





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Prescription Medicines Code of  
Practice Authority

The PMCPA is a division of the  
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