

To

- NHS Trust Provider CEOs
- NHS Acute Trust Medical Directors
- CCG Accountable Officers and Clinical Leaders

NHS England  
Skipton House  
80 London Road  
London  
SE1 6LH

[England.ConflictsOfInterest@nhs.net](mailto:England.ConflictsOfInterest@nhs.net)  
[www.england.nhs.net](http://www.england.nhs.net)

CC: Royal Colleges, BMA and the GMC

Phone: 01138 250 733

22 December 2017

Dear Colleague

In June 2016 the Association of British Pharmaceutical Industry (ABPI) launched [Disclosure UK](#), a searchable online database showing payments and benefits in kind made to NHS staff and organisations by the pharmaceutical industry for key collaborations including: speaking at and chairing meetings and symposia, training services, and participation in advisory board meetings.

All pharmaceutical companies abiding by the [ABPI Code of Practice](#) must disclose payments made each year to UK healthcare professionals through Disclosure UK. When doctors, nurses and pharmacists give consent, this data is then published on an individual, named basis. Where individual consent is not provided, an aggregate figure is disclosed.

2016 data shows that the pharmaceutical industry spent a total of £454.5m working with NHS health experts and organisations. The majority of this (£338.1m) was for research and development activity – primarily clinical trials. 65% of healthcare professionals gave their consent for this data to be published on an individual basis; which is only a 10% increase from 2015. The initiative only achieves its purpose when the data is fully comprehensive. It is for this reason that NHS England and the ABPI share a joint, public ambition to reach 100% coverage as rapidly as possible. 2017 is now the critical year to demonstrate that this voluntary approach works, but this depends on how close we come to the 100% goal.

### **Our call to action:**

*Disclosure UK* provides a valuable opportunity for healthcare professionals to further demonstrate their integrity in the eyes of patients and the public, which is why we have included reference to it in the NHS England [guidance on managing conflicts of interest](#). In line with this guidance, we want you to help us make sure that 100% of individuals collaborating with the pharmaceutical industry take this opportunity to give their consent to disclose payments or benefits in kind they have received by ensuring that this guidance is effectively embedded and communicated within your

institution.

In support of this, the following context may be useful:

### **The disclosure process**

Disclosure data is published annually in June, one year in arrears. Data for 2017 collaborations will be public on *Disclosure UK* in June 2018. Responsibility for submitting data to the website lies with the pharmaceutical companies. All healthcare professionals need to do is agree when pharmaceutical companies ask for their consent to publication.

The information published on the *Disclosure UK* website includes:

- Healthcare professional's name
- Healthcare professional's principal practicing address
- The payment amount or equivalent benefit in kind in four categories: registration fees; travel and accommodation, fees for service/consultancy, related expenses for fees for service/consultancy
- Pharmaceutical company name

The ABPI only receives individual level data from companies where they have consent from healthcare professionals. This is the data which appears on the live database. Healthcare professionals are able to log on to a secure website to view the data that will be published before it goes live, and raise any questions about the data before it is made public (the annual publication timeline is provided in annex A).

In the event that the 2017 voluntary process does not give rise to a substantial reduction in the number of doctors withholding their consent, then the NHS will take action to introduce alternative measures to ensure full disclosure.

### **Public support for Disclosure UK**

A number of organisations including NHS England, the Academy of Medical Royal Colleges, the General Medical Council and the National Institute for Health and Care Excellence have made public statements in support of *Disclosure UK*. Further details and links to public statements are provided in annex B.

### **Communication and engagement support**

The ABPI has published an engagement and communications toolkit which many NHS trusts received via their communication teams this summer. The toolkit includes a suite of materials designed to explain what *Disclosure UK* is and how it works including an introductory PowerPoint presentation, leaflets and posters.

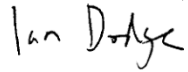
We would advocate that you make the most of these resources when engaging with colleagues about *Disclosure UK* and promote the disclosure website [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk) to enable colleagues to search for information themselves.

The ABPI is very willing to present on *Disclosure UK* to any relevant Board and Committees where you would find this useful.

OFFICIAL

For more communication and engagement support from the ABPI email [info@disclosureuk.org.uk](mailto:info@disclosureuk.org.uk).

Yours faithfully



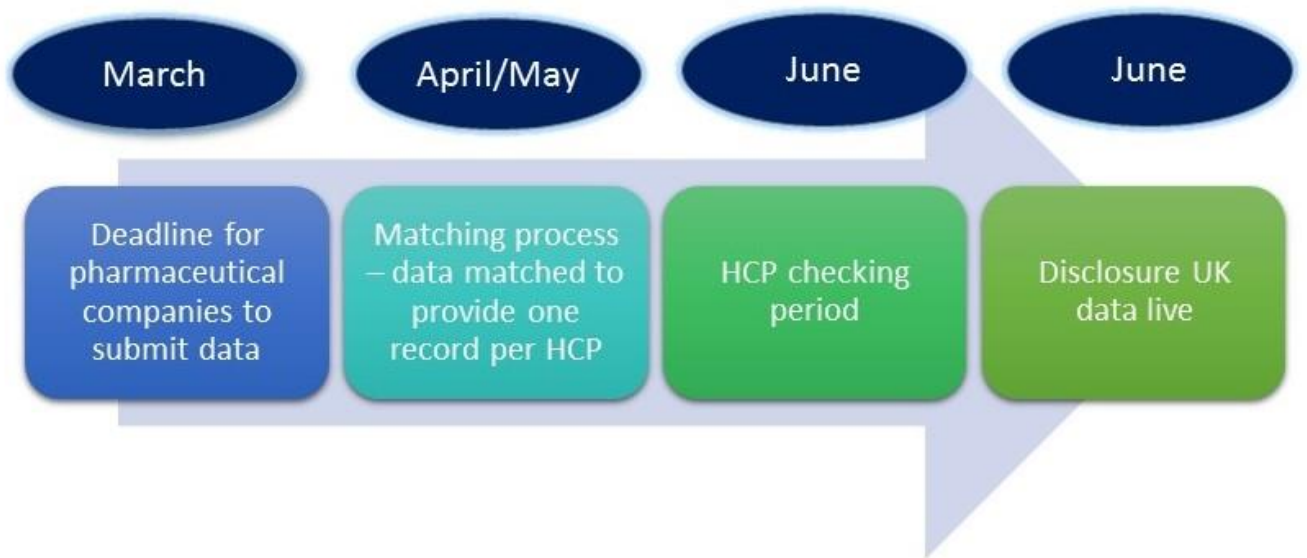
Ian Dodge, National Director, Strategy and Innovation, NHS England



Mike Thompson, Chief Executive, The Association of the British Pharmaceutical Industry

**Annex A: Annual timeline for publication of Disclosure UK data:**

Annual Disclosure UK timeline



## Annex B: Public statements in support of Disclosure UK

- In June 2017, the NHS England [guidance on managing conflicts of interest](#) came into force, explicitly endorsing the *Disclosure UK* initiative:

*“...organisations should seek to ensure that staff who are subject to wider transparency initiatives such as the ABPI Disclosure UK scheme are aware of and comply with them...”*

- The Academy of Medical Royal Colleges supports the NHS England guidelines on declaring conflicts of interest and [released a statement](#) in June 2017 relating to *Disclosure UK*, stating that:

*“Ultimately we would expect one hundred percent take up because patients should know the basis on which their doctor is making a recommended treatment.”*

- The GMC issued a [joint statement](#) from the Chief Executives of statutory regulators of health and care professionals around handling conflicts of interest in September 2017 which is explicitly supportive of the principle that healthcare professionals should be open about any conflict of interest they face and ensure that their professional judgement is not compromised by personal, financial or commercial interests, incentives, targets or similar measures.
- In addition, NICE is currently reviewing consultation responses to its draft conflicts of interest guidance in which it also proposes to endorse *Disclosure UK*:

*“We strongly encourage individuals to give their consent for payments they receive from the pharmaceutical industry to be disclosed as part of the ABPI Disclosure UK initiative...”*