

Transparency Reporting A Quick Guide

THE PURPOSE OF THIS QUICK GUIDE

The purpose of this Quick Guide is to provide a snapshot of 'how to' meet transparency reporting requirements. It is designed for Medicines Australia member companies who commit to reporting transparently as part of their compliance with the Medicines Australia Code of Conduct. It also applies to any other non-member innovative pharmaceutical company that chooses to report transparently as an optional approach to demonstrate high ethical standards. Medicines Australia welcomes all companies to report transparently.



"Companies are committed to transparency in their interactions with healthcare professionals and other stakeholders, to maintain trust and confidence in the industry."

- OVERARCHING PRINCIPLE 2, CODE OF CONDUCT

Medicines Australia recognises that reporting transparently is a public benefit which provides visibility for consumers of payments and transfers of value made by Australian companies.

This is articulated in the Medicines Australia Code of Conduct at Part E, Section 15.
Further information: medicinesaustralia.com.au/code/transparency-reporting

The Three Reporting Arms

Medicines Australia has three separate reporting mechanisms to report payments and other activities:



Payments and Transfers of Value made to healthcare professionals: information about healthcare professionals who receive payments or educational support through airfares, accommodation or registration fees.



Third Party Meeting Sponsorship: supporting independently organised educational activities that support the enhancement of medical knowledge and the quality use of medicines.



Health Consumer Organisation Support: financial and in-kind relationships with health consumer organisations with the objective of enhancing the quality use of medicines and supporting better health outcomes for the Australian community.

Reporting Timeframes

Each of the three reporting mechanisms has its own timeframe, as identified on the [Medicines Australia website here](#). Where a due date falls on a holiday or weekend, the nearest business day will apply.

The below timetable provides a more detailed version:

Report Type	Report Format	Report Timeframe	Due	Submit to	Published
HCP Payments / Transfers of Value	.csv	1 May - 31 Oct	21 Feb	Disclosure Australia	28 Feb
Accompanying HCP/ToV verification form	PDF		7 Mar	Medicines Australia	N/A
Third Party Sponsorships	.csv	1 May - 31 Oct	28 Feb	Medicines Australia	30 April
Accompanying Third Party verification form	PDF				N/A
Health Consumer Organisation Support	.csv	1 Jan - 31 Dec	30 Apr	Medicines Australia	30 June
Accompanying HCO verification form	PDF				N/A
HCP Payments / Transfers of Value	.csv	1 Nov - 30 Apr	24 Aug	Disclosure Australia	31 Aug
Accompanying HCP/ToV verification form	PDF		7 Sept	Medicines Australia	N/A
Third Party Sponsorships	.csv	1 Nov - 30 Apr	31 Aug	Medicines Australia	31 Oct
Accompanying Third Party verification form	PDF			Medicines Australia	N/A

Medicines Australia provides Excel spreadsheet templates for companies to use in their reporting. There are three templates, corresponding to each of the report categories. A verification form is included within the templates.

Available online via the [Code Resource Toolkit here](#).

Hot Tips for any reporting practice



Don't Duplicate

Whenever reporting is published on the Medicines Australia website or the Disclosure Australia website, it is not mandatory for member companies to duplicate that information on their corporate websites. The most important principles are that member companies meet their transparency requirements, and ensure their reporting is easily accessible to external stakeholders.

Companies which rely on the reports being published on the Medicines Australia website or the Disclosure Australia website should still ensure their corporate websites clearly articulate their approaches to transparency reporting and make available the various links to where any such reporting can be viewed.

Verify your report

For each reporting round, member companies are required to submit to Medicines Australia a verification that the information provided is truthful and complete. A form is included within the report templates which are available in the Code Resource Toolkit on the MA website.

The verification form must be signed by a relevant senior leader. Electronic and digital signatures are accepted.

Verification forms are usually due at the same time as reports, or a week after.

"Being transparent about payments and other activities means that everyone can easily understand the nature and extent of programs we support, including programs which might lead to the next discovery of a new and innovative medicine, vaccine or treatments"

- ELIZABETH DE SOMER, CEO, MEDICINES AUSTRALIA

What does the Code say?

Section 15.1: It is reasonable for healthcare professionals to be fairly compensated. This section talks about payments and Transfers of Value made to healthcare professionals.

Section 15.2: It is reasonable for the pharmaceutical industry to financially support the education of healthcare professionals. This section talks about Third Party Meeting Sponsorship.

Section 15.3: It is reasonable for Companies to provide financial support ... to organisations that work to benefit Australian patients. This section talks about Health Consumer Organisation Support.

Payments and Transfers of Value to Healthcare Professionals Reports

It is reasonable for pharmaceutical companies to fairly compensate healthcare professionals for legitimate expertise and services provided to the industry. Section 15.1 of the Code of Conduct details the various payments and values that should be reported.

Work that needs to be done well before reporting due-dates:

- Companies must provide healthcare professionals with a period of at least six weeks to review, verify or correct collected information about payments and transfers of value relating to them.
- Companies must not make a transfer of value unless they have taken appropriate steps to give notice of this disclosure obligation, so that the healthcare professional would reasonably expect the disclosure.

The Code Resource Toolkit hosts example statements which companies can use in relation to engaging healthcare professionals and their duty to collect and report on any such engagements, both pre- and post-engagement. These differ from the reporting templates – they are called 'Collection Statements for use in HCP engagements (Example)'

Payments and Transfers of Value to Healthcare Professionals are often abbreviated to "ToV to HCPs"

There are 2 rounds of this reporting type due annually.

**DID YOU
KNOW?**

- Disclosure Australia is the central reporting system, from which a search engine is available through disclosureaustralia.com.au.
- Reports are to be emailed to Disclosure Australia via email (reporting@disclosureaustralia.com.au) on the due dates.
- On receipt of your report, your data is validated to ensure all fields have appropriate values. If there are any anomalies in the data, such as non-numerical figures or empty fields, the data requires correction and resubmission. Validated data does not mean the accuracy of the data has been verified by Medicines Australia: this is the responsibility of the member company. After validation, the data will be uploaded to Disclosure Australia.
- In either case, your submitted report will be acknowledged and you will receive confirmation when the data is validated and ready for publishing.
- A summary table of aggregated information about your report is not required.
- By COB on the publication date, the data is published to Disclosure Australia, searchable by the public

Pre-publication update:

Medicines Australia will hold a pre-publication update for members, prior to the data being published. This provides an overview and discussion of data and trends ahead of publication, and will be advertised through the Medicines Australia member portal.

Third Party Sponsorship Reports

It is reasonable for the pharmaceutical industry to financially support the education of healthcare professionals through sponsorship of meetings and symposia organised by third parties, and that such support is publicly disclosed. Section 4 of the Code of Conduct details the array of third-party educational events that need to be reported.

- Third party sponsorships are published on the Medicines Australia website here.
- Medicines Australia provides an Excel template for reporting which is located on our Code Resource Toolkit ("Sponsorship of Third Party Meetings and Symposia Template"), with the additional 'number only' columns used for Medicines Australia auditing purposes.
- Reports are emailed to codehelpdesk@medicinesaustralia.com.au on the due date.
- On receipt of your report, Medicines Australia will check the data for numerical consistency. Validated data does not mean that Medicines Australia has verified the accuracy of the data: this is the responsibility of the company.
- In either case, your submitted report will be acknowledged, and you will receive confirmation that the data is validated, or that you need to fix discrepancies.
- We will request a PDF document (with the three additional columns deleted) once we have checked the Excel version.
- The final PDF reports are then published on the Medicines Australia website here on the publication date.

Health Consumer Organisation Support Reports

It is reasonable for companies to provide financial support and/or significant direct or indirect non-financial support to organisations that work to benefit Australian patients, and it is appropriate for these activities to be reported. Section 12 of the Code of Conduct details how companies should interact with Health Consumer Organisations.

- Health Consumer Organisation support reports are published on the Medicines Australia website here.
- Medicines Australia provides an Excel template for reporting which is located on our Code Resource Toolkit ("Health Consumer Organisation Support"), with the
- additional 'number only' columns used for Medicines Australia auditing purposes.
- Reports are emailed to codehelpdesk@medicinesaustralia.com.au on the due date.
- On receipt of your report, Medicines Australia will check the data for numerical consistency. Validated data does not mean that Medicines Australia has verified the accuracy of the data: this is the responsibility of the company.
- In either case, your submitted report will be acknowledged, and you will receive confirmation that the data is validated, or that you need to fix discrepancies.
- We will request a PDF document (with the one additional column deleted) once we have checked the Excel version.
- The final PDF reports are then published on the Medicines Australia website here on the publication date.