

Declaration of payments to healthcare professionals

Do you agree or disagree with the principle that payments from commercial organisations to individually named health care professionals should be transparent?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Do you agree or disagree with the principle that payments from commercial organisations to individually named health care professionals should be publicly declared?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

**Please outline your reasons why/why not below:
Please answer in under 500 words**

BPS considers that disclosure is essential in terms of ensuring public understanding of such payments, public trust in health care professionals (HCPs) and their prescribing choices. Disclosure will allow both HCPs and industry to demonstrate that they are making responsible decisions in accepting/offering payments, and that these payments are in line with appropriate professional standards. Whilst BPS appreciates this open system might impact on individual HCPs, we hope that our members will embrace disclosure and will work with the ESHLSG to support its implementation.

BPS will be pleased to see individual level data disclosed in the future since aggregate data does not give any meaningful information about the relationship between industry and HCPs.

Specifically, individual-level declaration of payments would be useful in assessing conflicts of interest; for example, it would be clear whether a proposed expert speaker has a financial relationship with a company – and what the nature of these payments is – before they are even invited to speak.

Do you agree or disagree that a system of disclosure of payments should take the form of a single, publicly searchable, central database?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

**Please outline your reasons why/why not below:
Please answer in under 500 words**

It is appropriate that members of the public can access this information if they so wish. As the NHS is publicly funded and most HCPs will work within the NHS, there is a need for transparency that will strengthen and maintain public trust. The public should be entitled to see this information.

A single central database would ensure this information can be found and navigated easily, rather than information being spread across multiple websites which while public, would not be meaningfully accessible.

Additionally, it is important that there is a clear understanding of whose responsibility it is to ensure information is accurate and up-to-date (including agreed criteria of what up-to-date means, what the term accurate means) and the means of appeal or making changes to the database.

Do you agree or disagree that individual health care professionals should play a role in the disclosure of payments received from commercial organisations (e.g. submitting information or validating the information submitted by others), alongside the submission of the same information by industry?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

**Please outline your reasons why/why not below:
Please answer in under 500 words**

HCPs should be involved in declaring payments made to them. This will serve the dual purpose of allowing individuals to check that information is accurate and encourage HCPs to acknowledge ownership of their collaborations with industry.

BPS favours greater detail in these disclosures so that the expenditure is clearly categorised. The Society also considers it important that HCPs and commercial organisations agree the appropriate categorisation in advance of any register going live.

Do you agree or disagree that disclosure of payments to health care professionals should apply to all types of commercial life sciences organisations (e.g. devices, diagnostics and bio-pharmaceutical industry) and not only the pharmaceutical industry?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

**Please outline your reasons why/why not below:
Please answer in under 500 words**

Disclosure should apply to payments from all types of commercial organisations. HCPs should be open and welcome public scrutiny of their relationships across all sectors.