

HCP/HCO Disclosure

Methodological note structure's template

Introduction

In 2014, by introducing the disclosure requirements, EFPIA and its members have demonstrated their commitments to self-regulation but also the legitimacy of the interactions with HCPs, and HCOs.

Member Companies and companies that are members of Member Associations are required to disclose transfers of value¹ made to HCPs and HCOs. This disclosure includes, by HCP or HCO, the total amounts of value transferred, by type of activity.

The disclosure must be aligned with local laws and regulations. The methodological note is required for disclosure based on the EFPIA Code requirements as transposed in national codes provisions.

To improve the consistency of the EFPIA disclosure, this structure template is mandatory and must be transposed and implemented at the latest for the 2026 disclosure of 2025 ToVs.

The methodological note is usually made for a specific country; if this is the case, please specify the country concerned.

In addition to the methodological note in the local language, it is recommended to have an English version.

Definitions

- Recipients (Type of recipients included – If needed, include the definition of Healthcare Professional at national level – Treatment of retired and deceased HCPs)
- Kind of ToVs (donations and grants – contribution to costs of events – fees for services and consultancy – R&D² – others)

Disclosure's scope

- Products concerned (Type of products included in the disclosure report: Prescribed Only Medicines, Over the Counter Medicines, others)
- Company concerned (affiliate – merger – company rebrand)
- Excluded ToVs
- ToVs date
- Direct ToVs
- Indirect ToVs
- Non-monetary ToVs

¹ Transfers of Value are direct and indirect payment, whether in cash, in kind or otherwise or reimbursement provided to HCPs and HCOs.

² Cf. EFPIA's R&D best practice guidance: <https://efpia.box.com/s/nms7cod07bbkwwjenr3kcyerdk17k4xw>

- ToVs in case of partial attendances or cancellation and refund
- Cross-border activities
- R&D
- Voluntary disclosure (anything discloses beyond the national Code)

Specific considerations

- Country unique identifier (if needed, specify which identifier is used and for which purpose)
- Self-incorporated HCP (depending on the local legislation, qualified as individual or company)
- Multi-year agreements
- Country specificities
- Quality Checks (optional for pre-disclosure)

Data protection legal basis

- Consent collection (inc. consent withdrawal)
 - o Partial consent
- Legitimate interest (inc. balancing test, right to object)

Form of Disclosure

- Date of publication
- Disclosure platform
- Disclosure language

Disclosure financial data

- Currency (local or if not, specify the exchange rate)
- VAT included or excluded
- Calculation rules (e.g., in-kind ToVs)

Additional information