Preventing fragmentation in healthcare payments data

January 2024

We're concerned that plans to introduce disclosure requirements for industry payments to the healthcare sector could fail to bring about the intended increase in transparency. This is because they could result in 'fragmented data'. Addressing this is straightforward - we suggest two changes to help the regulations achieve their goal.

Background

The Department of Health and Social Care (DHSC) is proposing new regulations that will require manufacturers and commercial suppliers of medicines to publish data on their payments to the healthcare sector. This aims to improve transparency and ensure that doctors make impartial and evidence-based decisions about patient care. A consultation was published in September 2023 to seek views on this proposal.¹

Our concern

Consistent public data on healthcare payments is a welcome move. However, we're concerned about two things:

- 1. The consultation suggests that the payment data would be published on individual companies' websites.
- 2. It doesn't mention 'data standards' rules to ensure the format of the data is consistent across suppliers.

Together, these would result in 'data fragmentation' - every pharmaceutical company's payment data would be scattered across the internet, potentially in different technical formats. This makes it hard for anyone to find the data and join it together.²

Why does this matter?

The current plans will still help deter conflicts of interest and let users find all payments made by a company. But the data becomes far more useful if it is easy to collect together into a common dataset. Researchers need aggregated data to:

¹ Department of Health and Social Care, <u>'Disclosure of industry payments to the healthcare sector'</u> (2023).

² For more information, see Alex Parsons and Anna Powell-Smith, <u>'Unlocking the value of fragmented public data'</u> (2023).

- 1. Find all payments made to a particular doctor not just payments made by a particular company.
- 2. Track payment trends across the industry.
- 3. Build user-friendly public search tools for payments data, like the US's OpenPayments project.³

At the moment, all of these uses would require regularly searching all companies' websites for unpredictably located data files, then importing each spreadsheet into a central database, making sure each dataset was formatted in the same way. This is too expensive for almost anyone to do in practice.

An example from local authorities bears this out: since 2015, councils have published data on spending over £500 in a move intended to improve transparency. However, the data has been little used because it is spread across council websites in different formats.

The solution

Happily, two small changes would hugely increase the overall value of the payments data, without increasing burdens on the companies publishing it. We recommend that DHSC plans to create:

- 1. A collaborative, but mandatory, **data standard** the rules on what the data should contain, and the technical format in which it should be published.⁴
- 2. A **centrally maintained repository** of the published datasets' URLs (or of the data itself if resources allow) to which manufacturers will submit information.

For drafting purposes, DHSC could simply specify that the Secretary of State will set out requirements on format and publication in consultation with manufacturers and data users. The Levelling Up Act provides an example of how this has been drafted before.⁵

We believe it is important to consider data fragmentation at this stage. Further down the line it will be more difficult to unify the data and increase transparency.

About us

The Centre for Public Data is a non-partisan non-profit founded in 2020. We work to improve the quality of public data - data that is published or regulated by the government - to support civil society and business. We'd be happy to discuss any of the above further - please get in touch at contact@centreforpublicdata.org.

³ OpenPayments, <u>'Learn about the financial relationships that drug and medical device companies</u> have with doctors and other healthcare providers'.

⁴ The Cabinet Office's Data Standards Authority can provide help on specifying data standards.

⁵ Levelling Up and Regeneration Act 2023 (c.55, part 11).