

PUBLIC REPRIMAND NOVO NORDISK CASE AUTH/3847/11/23

Novo Nordisk has been publicly reprimanded by the Code of Practice Appeal Board due to its failure to disclose transfers of value of approximately £7.8 million. The failures occurred over three years, which was the period selected by Novo Nordisk for its internal investigation (Case AUTH/3847/11/23). The failures to disclose related to over 150 different bodies, largely healthcare organisations, and represented between 10-14% of each year's total transfers of value.

The Appeal Board considered the scale of the undisclosed value identified thus far, over a sustained period, was extremely serious. The Appeal Board was concerned that there appeared to be fundamental governance failures. The wide ranging systemic failings apparent to the Appeal Board included inadequate training, processes and monitoring.

Accurate disclosure was fundamental to the principle of transparency and maintaining public confidence in the pharmaceutical industry.

The Appeal Board considered that the process of internal investigation and voluntary admission which was apparent in this case was to be encouraged. It appeared that this voluntary admission was, in part, prompted by a complaint (Case AUTH/3752/3/23).

The Appeal Board noted the company was currently under an audit cycle as a result of its suspension by the ABPI Board (Case AUTH/3525/6/21) and therefore considered that an additional audit sanction by the Appeal Board was not necessary. The Appeal Board expected that the upcoming October 2024 re-audit required by the ABPI Board would, among other things, evaluate the company's current processes in relation to disclosure of transfers of value