

VOLUNTARY ADMISSION BY FERRING

Undisclosed transfers of value and failure to certify a patient website relating to inflammatory bowel disease

This case concerned a voluntary admission by Ferring Pharmaceuticals Ltd concerning undisclosed transfers of value to five healthcare organisations. These transfers of value arose from the support Ferring provided for localised materials to be produced for each healthcare organisation. This was part of a broader project to support a patient webapp for inflammatory bowel disease (IBD).

The voluntary admission also related to the fact that a website had not been certified prior to use. The website comprised general information about IBD, together with associated materials such as medical alert cards, A3 posters for wards and pull-up banners with a QR code or link to the website. Ferring paid an agency to create and host the digital materials, and a separate agency to print them. Bespoke materials and a localised version of the associated webapp were produced for each recipient healthcare organisation.

Ferring explained that it had now concluded that its provision of these materials should have been categorised as sponsorship and the associated amounts should therefore have been disclosed. Ferring had a written agreement in place with each healthcare organisation and the payments to the agencies were categorised as benefits-in-kind for the healthcare organisations. The total value of the undisclosed transfers of value was £48,739 across the four years in question: £20,030 (2022), £18,172 (2023), £5,231 (2024) and £5,306 (2025).

The case preparation manager considered that the matter met the criteria for the abridged complaints procedure because they agreed with the voluntary admission that there had been breaches of the Code and the relevant clauses were on the PMCPA's approved list for use of the abridged procedure. In addition, the total of the transfers of value was less than £50,000.

The case preparation manager:

- accepted Ferring's submission that providing funding for bespoke materials and localisation of the website was likely to constitute a sponsorship arrangement with each of the five healthcare organisations concerned, and that the transfers of value therefore should have been disclosed under Clause 28.1 within the timescale required by Clause 31.1,
- considered that although the website and printed materials included a declaration of Ferring's involvement, and the printed materials had been certified, the website had not been certified as a material for patient support (as required by Clause 8.3), and
- noted the outcome of Ferring's investigation which concluded that while this was not a systemic issue, aspects of the governance of this project were not in line with the Code. The failure to identify the correct categorisation of the arrangements over a four-year

period, and not certifying the website, indicated a failure by Ferring to maintain high standards (Clause 5.1).

Ferring provided the required undertaking and assurances and accepted breaches of Clauses 5.1, 8.3, 28.1 and 31.1 of the 2024 Code and, in relation to the pre-2024 transfers of value, Clauses 28.1 and 31.1 of the 2021 Code. Ferring also confirmed that all the transfers of value in question had subsequently been disclosed.

The outcome under the 2021 Code of Practice was:

Breach of Clause 28.1	Failing to publicly disclose transfers of value to healthcare organisations
Breach of Clause 31.1	Failing to disclose transfers of value annually within the first six months after the end of the calendar year in which the transfers of value were made

The outcome under the 2024 Code of Practice was:

Breach of Clause 5.1	Failing to maintain high standards
Breach of Clause 8.3	Failing to certify material for patient support
Breach of Clause 28.1	Failing to publicly disclose transfers of value to healthcare organisations
Breach of Clause 31.1	Failing to disclose transfers of value annually within the first six months after the end of the calendar year in which the transfers of value were made

Voluntary admission received 14 July 2026

Case completed 17 August 2026