Transparent MedTech User Manual
1. The Transparent MedTech platform

1. Introduction

Transparent MedTech is the central database where Companies are to publish the Educational Grants they provide to Healthcare Organisations based or registered in the MedTech Europe Geographical Area\(^1\) in accordance with the MedTech Europe Code of Ethical Business Practice (“the Code”). This also includes any financial allocation to medical education provided to for-profit entities such as Professional Conference Organisers.

2. Scope: Educational Grants

Educational Grants are defined in the Code as follows:

- **Educational Grants**: means provision of funding, Member Company or third party products or other in kind support to a Healthcare Organisation by or on behalf of a Member Company on a restricted basis for use solely for the support and the advancement of genuine medical education of Healthcare Professionals, patients and/or the public on clinical, scientific and/or healthcare topics relevant to the therapeutic areas in which the Member Company is interested and/or involved.

Educational Grants are further regulated in Chapter 4, Section 3 of the Code. In particular, the Code notes that Educational Grants can be provided for the following (non-exhaustive) purposes:

a. Support for Third Party Organised Educational Events, including:
   1. Support for HCP Participation at Third Party Organised Educational Events
   2. Support for Third Party Organised Educational Events
b. Scholarships and Fellowships
c. Grants for Public Awareness Campaigns

---

\(^1\) MedTech Europe Geographic Area includes the countries in the European Economic Area as well as those countries where Member Associations are located (Switzerland, Turkey, Russia and the countries covered by Mecomed, the Middle East and North Africa Association).

\(^2\) The countries covered by Mecomed are not within the scope of the disclosure obligation for the first reporting period (2017).
3. Format of the publication

Educational Grants are disclosed in Transparent MedTech under two different categories:

a. Support for Third Party Organised Educational Events (which includes points a.1 and a.2 above) and,

b. Any other Educational Grant (including points b and c)

4. Accessing the system

Transparent MedTech, as one of the MedTech Europe initiatives in the Ethics and Compliance area is hosted in www.ethicalmedtech.eu
2. Company Account(s)

1. Account management

Companies are free to choose the internal arrangement they will use to disclose the Educational Grants. The system allows for reporting of Educational Grants at European level (with one single account), or the creation of as many accounts as necessary for subsidiaries, branches, or other dependent entities.

Each Company will nonetheless need to create one Master Account which will be approved by the MedTech Europe Secretariat. Once this Master Account has been created and approved, Companies are free to create Subsidiaries (please note this is a generic name for accounts dependent on the Master Account, it is not meant to have any legal implication).

2. Master Account creation procedure

Ideally, your company should create a dedicated e-mail address for transparency purposes. This will make it easier to transfer the account if there is an eventual change of roles in your organisation, and will also help further anonymise interactions related to the Transparency system (such as the contestation of disclosures system). This account can be for instance “transparency@company.com”.

Account creation steps:

Navigate to the main page of Transparent MedTech (http://transparentmedtech.eu/medtech-public/#/accueil) and click on “Company access”, on the right top corner of the screen.
Once in the Company Area, click on “Register”

In the following screen, please enter the requested information to create the Master Account for your Company. All fields are mandatory except for the Phone of the main contact person.

**Important:** It is recommended to use the generic transparency account mentioned at the beginning of this section to create this account.

Once you have entered all the required information, click on “Save”. You will see the following screen:
You will receive a verification request e-mail in the address provided as the Main Contact (Administrator). Copy the link you will find in the e-mail and paste it in an internet browser.

Please note that in some cases, like the one shown above, your e-mail software may not recognize the full link, and clicking in the hyperlinked part will result in the following error message being displayed.

To ensure this does not happen, manually copy and paste the full link in your preferred internet browser. Once you have done this, you will see the following screen:
You will also receive the following e-mail:

**[Medtech Europe Transparency] Account register**

Transparency MedTech Europe  
Sent: Wed 20/09/2017 12:53

Dear,

We confirm the registration of your registration for the company:  

Your account must now be approved by the Medtech Europe administration. Once this step is completed, you will receive your password by email. The validation of your account may take a few days.

You will find below your login allows you to access your business space.

Login

The Medtech Europe Transparency team

**Very Important:** This e-mail needs to be saved and kept at hand. Your login **username** is included in it, almost at the bottom of the e-mail (see above). It will be a combination in the following format: “firstname.lastname”

At this stage, please contact the MedTech Europe Secretariat (ethics@medtecheurope.org) to let us know that you have successfully validated your Master Account e-mail, and you are awaiting activation.

We will only activate a Master Account once we verify the account has been created by the right person within the organisation.

Once we activate your account you will receive the following e-mail:

**[Medtech Europe Transparency] Account validation**

Transparency MedTech Europe  
Sent: Wed 20/09/2017 13:19

Hello,

We inform you that the Company’s registration was validated.

You will find your password for you to access your business space.

Password

The Medtech Europe Transparency team

**Very Important:** This e-mail also needs to be saved and kept at hand. Your login **password** is included in it, almost at the bottom of the e-mail (see above).
You can now log into the system using the combination of the provided username and password in the Company Access page:

Once logged in, the main Company Site page looks like this:
3. Subsidiary Account creation procedure

To create a Subsidiary Account, you will first need to click on “My company”.

This page contains many different useful options that we’ll tackle in the following chapters. To create a Subsidiary Account, please scroll to the bottom of the page. Click on “Add subsidiary”.

![Image of the MedTech Europe website showing the My company option and the Add subsidiary button.](image-url)
You will be directed to a page identical to the one sued to register your Master Account. Once you have completed the required fields, click on “Save”.

Once you have saved the registration, you will be able to see the registered subsidiaries at the bottom of the “My Company” page:

Only the administrator of the Master Account can create Subsidiary Accounts. To be able to do this the e-mail addresses provided when creating them need to be verified just as it was done for the Master Account, so an e-mail will be sent to the registered e-mail address:

[Medtech Europe Transparency] Email verification

Transparency MedTech Europe

Sent: Wed 20/09/2017 15:19
To: Pablo Rojas Abad

Dear,

You asked an account for Medtech Europe transparency for the company: medtech subsidiary (FHEYCICS).

For connecting the application you first have to validate your email. Please click the link provided below or copy paste the url to your navigator.

http://transparentmedtech.eu/medtech-company/flow/validation_compte?identifiant=pablo.rojasabad&cleActivation=b0eab5ad6e837b95fcb1a8eaff9000e1c71d7d73551a4e81ce320899e8fc2

one done, you will be able to access your company space with the login below:

Login : pablo.rojasabad

The Medtech Europe Transparency team
Once the e-mail address has been correctly validated you will see the following message (if you receive an Error message please try copying and pasting the link in your browser again):

SUCCESSFUL VALIDATION

Your company has been validated. An email has been sent to the administrator containing the password information.
The medtech transparency team

The Subsidiary Accounts are now active and can be used through the Master Account using the blue action button(s).

Or they can also be accessed using the specific account created for them at the time of their registration. Subsidiary Accounts have the same functionalities as Master Accounts in terms of reporting, but cannot create further levels of Subsidiary accounts.

To delete a Subsidiary Account, please contact us in ethics@medtecheurope.org.
4. Master Account management

The Master Account details can be changes in the My Company page:

Please note that even if the First name and Surname of the administrator is changed, the login details will not.
Changing e-mail is possible by introducing the new desired e-mail address in the E-mail field.
After all changes are introduced, please do not forget to click on “Save”.

5. Creating additional accounts for reporting

You can create additional accounts for users to access the system and report.
To do this, you need to access the “My Company” page and scroll down to the “CONTACT(S) IN CHARGE OF DECLARATION” area. Click on “Add new Contact”.
Fill the fields and click in the green icon.

**CONTACT(S) IN CHARGE OF DECLARATION**

<table>
<thead>
<tr>
<th>First name</th>
<th>Surname</th>
<th>E-mail</th>
<th>Phone</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

An e-mail will be sent to the e-mail address requesting verification of the account:

---

**[Medtech Europe Transparency] User account creation**

**Transparency MedTech Europe**

*Sent:* Fri 22/09/2017 17:15

*To:* [Email Address]

Dear,

A request to create a user account Transparency Health was conducted for the company. [Link]

To log in you must first verify your email, click the link below or paste it into your browser.

[http://transparentmedtech.eu/medtech-company/flow/validation_utilisateur?Identifiant=erwre.werwerwr&cleActivation=64443af3d87be7517a52053a3a3abdcd48709e9734de97324895ecc0915a48d](http://transparentmedtech.eu/medtech-company/flow/validation_utilisateur?Identifiant=erwre.werwerwr&cleActivation=64443af3d87be7517a52053a3a3abdcd48709e9734de97324895ecc0915a48d)

After this confirmation, you can then access your enterprise space with login below:

**Login:** [Email Address]

The Medtech Europe Transparency team
Once the account has been verified, the user will receive another e-mail with the password:

![Email content]

6. Creating additional accounts for managing objections

The process to create additional accounts for managing objections raised regarding declarations is essentially identical to the process described above for creating additional reporting accounts (Section 2.5), just click on the “Add new contact” button in the “CONTACT(S) IN CHARGE OF OBJECTION DEMAND” AREA and follow the steps indicated in the section above (2.5).
3. Disclosing
1. Manual Disclosure

To manually disclose Educational Grants, please click on “My declaration”.

In the following screen you can search all declarations made by your company or companies.
You can also enter a declaration manually from this screen. Click on "Add a new declaration"
The manual declaration page looks like this:

Once you have finished filling the information, click on save.

**Important**: In case the beneficiary doesn’t have a VAT or because of local laws and regulations it cannot be published without the entity’s consent, please let us know in transparency@medtecheurope.org. If you
are the first company to encounter this problem in that particular country, you will have the opportunity to propose a different unique identifier. The new category of unique identifier will be added to the drop-down menu that you can access once you click in the “Beneficiary doesn’t have VAT” tick box as shown below.

The declaration will now be shown in the “My declarations” page once you search in the correct year.

To edit any declaration, just click on it in the list, introduce the changes and save it. You can also desactivate the declarations simply by clicking on “desactivate”. 
2. Bulk disclosure

To disclose the information for several HCOs at once, a specific excel template must be used. This template can be downloaded from the main menu.

The CSV tool kit includes a small guide on how to use the excel template in different versions of Excel. Proceed filling the Excel template with the required information. Please note the only optional field is the “Object” field.

**Important:** Please make sure you introduce the correct Company ID in the first field of the template. Your Company ID can be found here:

Your subsidiaries will have a different Company ID.
The fields “Currency”, “Country” and “Educational Grant Type” require specific formats for the information in them.
You can find the correct format for these fields in the “Value list” tab.

Once all the information has been filled, click on the “Export to CSV” button on the right of the Excel template and save the resulting csv file.

This file has to be uploaded in the “Declaration importation” page, by clicking in the “Select file to upload” button (or equivalent in your browser’s language) and then on “Import”.

Any mistakes in the form will be highlighted in the “Error in the CSV” area. Please fix them, export the file again and re-upload the resulting CSV file.