

STANDARD OPERATING PROCEDURE	Contacts between WWL Staff and representatives of the Pharmaceutical Industry
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MANAGER RESPONSIBLE FOR REVIEW (Job Title)	Director of Pharmacy

Version Control

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3	June 2021	<ul style="list-style-type: none"> • Change in trust title to reflect teaching hospital status • No other changes made – review date reached

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1 Introduction

- 1.1 This procedure is aimed at pharmaceutical representatives and staff working in the Trust. The document is intended to address the potential conflict when engaging with the Pharmaceutical Industry. It is intended to supplement and provide practical advice in addition to the Trust's, Standard Financial Instructions (SFI) Code of Conduct, Gifts and Hospitality Policy and Fraud, Corruption and Bribery Policy and Response Plan. If you have any doubts on any part, then please contact your manager who will be able to advise you.
- 1.2 Pharmaceutical representatives should be directed to the Pharmacy department on their initial visit to the Trust to collect a copy of this procedure before contacting employees of the Trust.
- 1.3 The following procedure has been drawn up to maintain good relationships between NHS staff working in the Trust and the Pharmaceutical Industry.
- 1.4 The introduction of new drugs into the Trust is managed through the relevant divisional approval committees. In Medicine this is Drugs and Therapeutic Committee, Surgery is Divisional Quality Executive Committee, and Specialist Services is new Drugs and Procedures Committee. To avoid inappropriate contact with members of the committees, the membership will not be made publicly available.
- 1.5 Members of the pharmaceutical industry must not contact members of these committees to influence decision or to obtain information.

2 Code of Conduct

- 2.1 Visits to Trust staff should be by appointment only and staff should only discuss products marketed by the drug company concerned. Opportunistic visits by company representatives will not be accepted. Representatives will always wear a name badge and sign in at the relevant reception point.
- 2.2 Representatives must not visit wards or departments other than when appointments have been made with senior nursing or medical staff.
- 2.3 Representatives should see the consultant first by making an appointment and should ask the consultant's permission before seeing junior medical staff, non-medical prescribers, or nurses.
- 2.4 Representatives should not arrange to see nurses/midwives without prior approval of their managers.
- 2.5 Staff will endeavour to adhere to appointments, but clinical duties take priority. A contact telephone number should always be provided in case cancellation is necessary.
- 2.6 Samples of medication must not, under any circumstances, be left in any pharmacy or elsewhere within the Trust unless agreement has been obtained from the Chief Pharmacist.
- 2.7 Leaflets and posters produced by pharmaceutical companies must not be displayed or distributed in clinical areas unless approved by the Chief Pharmacist.
- 2.8 Representatives are not permitted to receive information about usage of competitor products.

- 2.9 Representatives must comply with current Association of the British Pharmaceutical Industry (ABPI) Code of Practice. Those not complying will be reported to their company and the ABPI. Excessive or disruptive activities will result in access to the Trust being denied.
- 2.10 Relevant staff are strongly encouraged to give their consent for payments they receive from the pharmaceutical industry to be disclosed as part of the Association of British Pharmaceutical Industry (ABPI) Disclosure UK initiative. These “transfers of value” include payments relating to:
- 2.10.1 Speaking at and chairing meetings
 - 2.10.2 Training services
 - 2.10.3 Advisory board meetings
 - 2.10.4 Fees and expenses paid to healthcare professionals
 - 2.10.5 Sponsorship of attendance at meetings, which includes registration fees and the costs of accommodation and travel, both inside and outside the UK
 - 2.10.6 Donations, grants and benefits in kind provided to healthcare organisations
- 2.11 Meetings that are sponsored by a pharmaceutical company must be held away from the ward or department area to avoid the risk of any misconceptions on the part of the public about possible inducements.
- 2.12 If a member of any committee that has influence on drug decision making within the Trust has a vested interest in a particular product or drug company they must declare it at the committee and not take part in any discussions or decisions pertaining to that product or company.

3 GIFTS, HOSPITALITY AND PROMOTIONAL MATERIAL

- 3.1 Only items with a nominal financial value such as pens, pads, and diaries etc which are relevant to work may be offered or given to Trust staff.
- 3.2 All gifts and/or promotional material must be discussed and approved with senior staff in the appropriate department/area. They must not be used to unfairly influence any commercial or clinical decisions.
- 3.3 The Trust Secretary will ensure that the Hospitality and Gifts Register is maintained to formally record details of staff members receiving hospitality or gifts exceeding £50 – see Trust Gifts and Hospitality Policy (TW11-033)
- 3.4 It is the staff member’s responsibility to report the receipt or offer of any relevant hospitality/gift over the value of £50 to the Trust secretary for inclusion in the register.
- 3.5 In all instances where the Chief Executive has agreed to any member of staff accepting sponsorship, or other hospitality, this must be recorded in the register together with a copy of the authorising document.

4 HUMAN RIGHTS ACT

Implications of the Human Rights Act 1998 have been considered in the formulation of this policy and they have, where appropriate, been fully reflected in its wording.

5 ACCESSIBILITY STATEMENT

This document can be made available in a range of alternative formats, e.g., large print, Braille, and audio CD.

For more details, please contact the HR Department on 01942 773766 or email equalityanddiversity@wvl.nhs.uk