

Policy for CCG Engagement with the Pharmaceutical Industry

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DOCUMENT STATUS

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RELATED DOCUMENTS

These documents will provide additional information:

REFERENCE NUMBER	DOCUMENT TITLE	VERSION
	CCG Constitution	V4.g
GB/XX/063/V2.0	Conflict of Interest Policy	V 2
AC/XX/003/V1.1	Counter Fraud, Bribery and Corruption Policy	V 1.1
AC/XX/004/V1.3	Standards of Business Conduct	V 1.3
AC/XX/005/V2	Gifts and Hospitality Policy	V1.2

APPLICABLE LEGISLATION AND OTHER RELEVANT EXTERNAL DOCUMENTS

Bribery Act 2010
Code of Practice for the Pharmaceutical Industry

GLOSSARY OF TERMS

TERM	ACRONYM	DEFINITION
Association of British Pharmaceutical Industry	ABPI	Trade association of companies in the UK producing prescription medicines.
Clinical Commissioning Group	CCG	Groups of General Practices that work together to plan and design local health services in England.
Department of Health	DH	The Ministerial Department of the United Kingdom Government responsible for government policy on health and adult social care matters in England.
General Medical Council	GMC	A fee-based registered charity with statutory obligation to maintain a register of medical practitioners within the UK.

CONTENTS

RELATED DOCUMENTS.....	2
APPLICABLE LEGISLATION AND OTHER RELEVANT EXTERNAL DOCUMENTS	2
GLOSSARY OF TERMS	3
CONTENTS	4
Background.....	5
Types of 'offer'.....	5
CCG Policy	5

Policy for CCG engagement with the Pharmaceutical Industry

Background

Pharmaceutical companies and other commercial entities can provide helpful support with financial and other resources. However, CCG staff or those acting on behalf of the CCG (including Clinical Leads, Prescribing Leads and Public Health Staff) need to be sure that any offer of support is in the best interests of the CCG, patients and public. This document provides a succinct set of rules for industry engagement. It does not cover activities relating to GP engagement relating to individual or practice level matters; GPs are advised to consult advice from the GMC which can be found [here](#).

Types of 'offer'

Broadly speaking there are 4 types of offer that companies may make:

- **Sponsorship** of meetings or other events – This is where the company provide financial support for a CCG organised meeting. The sponsorship could be in the form of direct payment or payment to a third party on behalf of the CCG, for example to a venue or caterer. These meetings must be educational in nature and cannot be business meetings.
- **Medical Education Goods and Services** – These are educational resources provided by the industry for customers. For example, educational tools such as DVDs, presentation materials or similar services.
- **Joint working agreements** – These are arrangements between the CCG and a company whereby both parties commit resources to improve patient care.
- **Rebates** – These are commercial arrangements whereby discounts for medicines prescribed are provided by retrospective payment.

The above offers should not be confused with industry funded speaker meetings. These are meetings arranged by a pharmaceutical company where specific medicines are discussed during the course of the meeting. Invites are circulated (normally by post) and are required to contain product information. These meetings may be helpful and are sometimes provided specifically to meet customers' specific needs; though at other times they are overtly promotional in nature.

CCG Policy

- All CCG staff (or representatives of the CCG) undertaking formal discussions with Pharmaceutical Industry employees (or their representatives) should have completed the e-learning module for healthcare professionals provided by the Prescription Medicines Code of Practice Authority, available here: <http://www.pmcpa.org.uk/training/Pages/E-learning-for-health-professionals.aspx>
- Industry employees are expected to adhere to the Code of Practice for the Pharmaceutical Industry. <http://www.pmcpa.org.uk/thecode/Documents/PMCPA%20Code%20of%20Practice%202014.pdf>

- Ideally, there should either be an alignment between the industry 'offer' and a CCG strategic or operational goal or the project should offer significant innovation or learning. Objectives for both parties should be clearly defined.
- All monies or other benefits received by the CCG or by employees / representatives of the CCG should be logged in the sponsorship and hospitality register. This excludes rebates and joint working agreements which are declared elsewhere (see below). This is kept by the CCG Contracts department with copies sent to the Pharmaceutical Public Health Team. Regular reports are provided to the CCG Audit Committee
- Any sponsorship offers made to the CCG with a financial value of > £500 by a single company should be reviewed by the Prescribing Sub-Committee in addition to logging as above, *before* the offer is accepted.
- Rebate offers should be handled in accordance with the CCGs rebate policy – with discussions directed to the Prescribing Sub-Committee in the first instance.
- Offers of Joint Working as defined in the DH / ABPI guidance should be referred to the Prescribing Sub-Committee for review and be ratified by the Clinical Development Committee. These arrangements are different from sponsorship and should be considered alongside the guidance: <http://www.networks.nhs.uk/nhs-networks/joint-working-nhs-pharmaceutical/documents/joint%20working%20toolkit%20dh.abpi.pdf/view>
- The Pharmaceutical Public Health Team at the Office of Public Health are available to advise on any aspect of industry engagement, Tel: 01384-816450.