



# Pharmacy Management

Progress through partnership

## Transparency and Governance in Dealings with the NHS

A Guide for Senior NHS Managers  
December 2015

## From Our Chairman

For over thirty years Pharmacy Management has worked with both the NHS and the pharmaceutical industry to the benefit of both. It is clearly in the interests of all parties, most importantly patients, that this should continue. However, it is equally clear that this must be done with respect for the need for transparency and good governance in the NHS. This leaflet explains to you how we propose to meet your requirements in these vital areas.

You need to know that, when you work with Pharmacy Management, we will uphold the highest ethical standards. In our Charter, included here, we pledge to do just that.

Our staff receive formal training on the ABPI Code of Practice. Many of them have held senior positions within NHS organisations. We believe that they understand your governance needs. In addition, if you ever have any governance concerns you are welcome to contact me and I will give my personal attention to your enquiry.



Ted Butler  
Chairman  
Pharmacy Management  
Ted.butler@pharman.co.uk  
Tel. 01747 829501



## What we do

Pharmacy Management provides education and training opportunities, arranges meetings and events and publishes journals.



Our PM Academy provides managerial, leadership and personal effectiveness skills training for pharmacy staff from all sectors.



PM Events is the arm of the company that organises large meetings. Our flagship event is the National Forum arranged annually in London which has been supported by the Department of Health, NHS England and the Royal Pharmaceutical Society ([www.pharmannationalforum.co.uk](http://www.pharmannationalforum.co.uk)). Similar regional events are staged through the year.



We have published the Journal of Pharmacy Management for over thirty years. This year we added a sister journal, the Journal of Medicines Optimisation. Both journals share good practice examples rooted in NHS service delivery and improved patient care.



PM Leadership provides high quality developmental training for future NHS pharmacy leaders. It has recently launched an 18 month long programme, Clinical Leadership in Pharmacy, for 24 pharmacy staff in conjunction with NHS Scotland health boards.

The Clinical Leadership in Pharmacy programme is accredited by the Faculty of the Royal Pharmaceutical Society. Pharmacy Management is proud to be a first wave training provider for the Faculty.

## Transparency

You will have read that the Secretary of State for Health proposes to introduce clauses to the contracts of NHS staff requiring them to disclose any payments received from external sources. This is welcomed; transparency is vital to the interests of all parties. Whenever we make a payment to a healthcare professional we take six key steps:

- ♦ We separate remuneration from reimbursement of genuine expenses (for which receipts are required).
- ♦ Any fee paid reflects the time commitment and is not excessive.
- ♦ The reason for the fee will be clearly stated on accompanying documentation.
- ♦ Fees and expenses will be publicly disclosed in line with UK and overseas legislation.
- ♦ We issue a transparency statement that specifies who has sponsored each event and the value of the benefit.
- ♦ Recipients are reminded in writing at the time of claim that it is their duty to make appropriate disclosure to the NHS and HMRC.

## The ABPI Code of Practice

The Association of the British Pharmaceutical Industry promulgates a code of practice which sets out stringent standards of behaviour. It can be read at <http://www.pmcpa.org.uk/thecode/interactivecode2015/Pages/default.aspx>.

### QR Code for the ABPI Code of Practice



The Code is administered by the Prescription Medicines Code of Practice Authority (PMCPA) at arm's length from the ABPI itself.

Although Pharmacy Management is not a member of the ABPI, our industry clients usually are and we voluntarily seek to abide by the Code of Practice.

Our NHS-facing staff have received training in the Code's terms and its application from CompliMed Ltd, who are specialists in this field of work.

## Governance

It is important that there should be no misunderstanding about the nature of an interaction between NHS staff and the pharmaceutical industry. For every meeting an agenda and the meeting objectives are sent to attendees in advance.

The ABPI Code of Practice, to which we seek to adhere, requires that promotional and educational activity be strictly separated. You may have read recent press reports of so-called "Advisory Boards" managed by other agencies at which companies allegedly promoted their products. An Advisory Board cannot be promotional. At our educational meetings our chairperson would intervene if any attempt were made to introduce promotion of a product.

Our events will only take place in venues which comply with the ABPI code of practice.

### Examples

Jane attends a meeting described as educational. The clinical data presented lead her to believe that a product would be of benefit to her patients so she wants to speak to a representative of the manufacturer about supporting its introduction locally. That discussion cannot take place within our meeting because it would be classed as promotional. The most she can do is to give her contact details for later follow-up.

At one of our Regional Roadshows Andrew finds himself sitting next to an industry delegate in a plenary session. He wants to talk about a product. The delegate will have to introduce him to a colleague because his role within his company medical information department does not permit him to discuss promotional activity. In addition, promotional activity should take place only within a designated area such as a company stand.

Sarah has undertaken a joint working project with one or more pharmaceutical companies. She can present their work but the notice of the meeting will have to disclose the involvement of companies in the project. This does not mean that Sarah or her organisation have necessarily received any funding or payments in kind, but companies are obliged by the ABPI Code to disclose the nature of their part in joint working.

We hope these examples help to clarify the way in which our mode of working supports good governance.

## The Pharmacy Management Charter

1. Pharmacy Management will ensure that the ABPI Code of Practice and understood NHS governance arrangements are adhered to in all of the organisation's activities.
2. Wherever possible and appropriate, Pharmacy Management Events will be accredited by the Faculty of the Royal Pharmaceutical Society.
3. Agendas and format of meetings will be independently devised and reviewed by people not involved in their creation for suitability.
4. Where satellite sessions are offered, the choices of NHS delegates will be respected so far as capacity permits.
5. Sponsored contributions at meetings will be clearly signposted.
6. The educational and promotional content of meetings will be clearly separated.
7. Senior Members of the Pharmacy Management team will always make themselves available to address any professional concerns should they ever arise.



**E F Butler**  
Chairman

