

NHS BRADFORD DISTRICTS CLINICAL COMMISSIONING GROUP POLICY ON RELATIONSHIPS WITH THE PHARMACEUTICAL INDUSTRY AND OTHER COMMERCIAL ORGANISATIONS

SCOPE

This policy has been designed to guide the CCG clinical leaders, governing body members and managerial support staff in their dealings with the commercial sector including the pharmaceutical industry.

Individual practice relationships with commercial partners or the pharmaceutical industry are not within scope unless those relationships are clearly concerned with the broader commissioning responsibilities of the CCG as opposed to GP providers own business.

Relationships with the commercial and pharmaceutical industry can take many forms but more commonly are about sponsorship, financial assistance or support in kind (often through the provision of staff or equipment).

GENERAL PRINCIPLES

1. Bradford Districts CCG recognises that there are benefits from commercial sponsorship and partnerships with the pharmaceutical industry.
2. Any arrangements and partnerships should demonstrate clear benefits to patients.
3. All dealings with the commercial and pharmaceutical industry should be transparent, recorded on the CCG's public facing website and carried out in a culture of trust and openness with appropriate governance and accountability.
4. General sponsorship of events such as conferences, seminars, training and educational events should not be the routine and expected resourcing method for such events and any general sponsoring of such an event should not be limited to one company or organisation.
5. Individual hospitality for employees, clinical board or governing body members (hotels, travel, meals, etc.) should be recorded in the CCG hospitality register. Prior approval should be sought through the Chair, Chief Officer or Chief Financial Officer.

CONSIDERATIONS PRIOR TO ARRANGING SPONSORSHIP

6. Where initiatives involve a pharmaceutical company or supplier of equipment, the proposed arrangements must comply fully with the Medicines (Advertising) Regulations 1994 (Regulation 21 – Inducements and Hospitality).
7. **Before entering into any sponsorship agreement** the appropriate staff, clinical board or governing body members of the CCG (i.e. those involved in the initiative or proposal) will:
 - Ensure that the interests of patients have been taken into account
 - Satisfy themselves that there are no financial irregularities that may affect the ability of a company to meet the conditions of the agreement
 - Assess the costs and benefits in relation to any alternative options
 - Ensure that the decision-making process is transparent and defensible
 - Ensure that the agreement would comply with requirements for the protection and use of patient information
 - Determine how clinical and financial outcomes will be monitored
 - Ensure that the agreement has termination clauses so that the CCG can terminate it if it becomes clear that the initiative is not providing expected outcomes.

8. Potential sponsors must be informed that any agreement will have no effect on purchasing decisions or the use of particular products.
9. Proposals which link sponsorship to the purchase, prescribing or use of any particular product must be refused and must be reported to the Audit and Governance Committee.
10. All proposals must be refused if they require the recommendation of the sponsor's products to patients unless these are in the best interests of the patient e.g. a specific NICE recommended product for example.
11. There must be no potential for fraud or corruption
12. There must be no real or perceived conflict of interest.
13. All dealings with the commercial or pharmaceutical sector should be clear where a third party is involved via the commercial partner and relationships with the third party should be treated in the same way as those with the commercial partner themselves.
14. If a major collaborative project with the pharmaceutical industry is undertaken a written contract should be established stating the exact conditions of the collaboration. For example this could include sponsorship of a new pathway of care, provision of staff to support a new development. The contract should discuss such items as company presence in meetings, presence of company logos on literature, content of promotional material on stands, etc. It should state that if the company does not fully adhere to the contract, then that company will be reported to the ABPI.
15. All agreements with commercial and pharmaceutical partners must be made at a corporate, and not individual, level.

SPONSORSHIP OF EVENTS

16. General sponsorship of events such as conferences, seminars, training and educational events should not be the routine and expected resourcing method for such events and any general sponsoring of such an event should not be limited to one company or organisation.
17. Hospitality must be secondary to the purpose of the meeting. The level of hospitality offered must be appropriate and not out of proportion to the occasion. The costs involved must not exceed that which the recipients would normally adopt when paying for themselves, or that which could be reciprocated by the NHS. It should not extend beyond those whose role makes it appropriate for them to attend the meeting.
18. Where meetings are sponsored by external sources, the fact must be disclosed, ensuring the advantages are detailed and analysed, in the papers relating to the meeting and in any published proceedings. A company name or logo is acceptable, but reference to a specific product is not.
19. The use of "trade" stand or displays should be discouraged. When present, they must be outside the meeting room. Industry representatives should be excluded from meetings purely about CCG business.
20. Industry representatives are not allowed to give presentations regarding their organisation's products at meetings

21. Industry representatives may assist in the procurement of speakers at sponsored meetings, if requested to do so by those organising the programme. They may not, however, insist on a particular speaker, or prevent the presence of a speaker chosen by the CCG.

HOSPITALITY

22. Hospitality to individuals should be proportionate and relevant to the role and purpose of individuals within the CCG. For example a day at the races would not be considered to be relevant and should be refused. An invitation to a business dinner where there were opportunities to network with leaders from other sectors may be appropriate.
23. All hospitality should be recorded in the hospitality register of the CCG and where the value exceeds or is likely to exceed £50 prior approval sought from the Chair, Chief Officer or Chief Financial Officer.

ADVICE

24. Advice on the implementation of this guidance may be sought from Jane Hazelgrave, Chief Financial Officer, Fiona Stephens, Head of Corporate Affairs or Tracey Gaston, CCG Head Pharmacist

REVIEW

25. This policy cannot cover every eventuality and will be reviewed as appropriate when different scenarios arise. It will be formally reviewed at least every two years and presented for approval by the Governing Body after each review.

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