

Guidance to support staff in Primary Care Networks (PCNs)/GP Practices when considering Joint Activities with the Pharmaceutical Industry

PURPOSE of this guidance:

To ensure that PCN/GP practice staff maintain the highest standards of probity and that all direct business relationships with the pharmaceutical industry lead to clear benefits for patients.

This guidance is intended to:

- Enable the PCN/GP practice to deliver its statutory duty to manage conflicts of interest
- Enable individual members of staff to demonstrate that they are acting fairly and transparently and in the best interest of patients and the local population
- Uphold confidence and trust in the NHS
- Safeguard commissioning, whilst ensuring objective decision-making
- Support individuals to understand when conflicts of interest (whether actual or potential) may arise and how to manage them if they do
- Ensure that the PCN/GP practice operates within the legal framework¹
- Uphold the reputation of the PCN/GP practice and its staff in the way it conducts business

Aim:

To protect patients and taxpayers and to clarify the steps which healthcare professionals should take to ensure appropriate standards of conduct to safeguard themselves and the NHS against conflicts of interest.

¹ [hwe-integrated-governance-handbook \(icb.nhs.uk\)](https://www.hwe-integrated-governance-handbook.icb.nhs.uk)

1. Acceptance of **commercial sponsorship**² and **joint working**³ should not in any way compromise prescribing and clinical decision making or be dependent on the purchase or supply of goods or services⁴.
2. Sponsors should not have any influence over the content of an event, meeting, seminar, publication or training. The PCN/GP practice should not endorse individual companies or their products. It should be made clear that the fact of sponsorship does not mean that the PCN/GP practice endorses a company's products or services. Sponsorship by appropriate external bodies should only be approved if the named PCN/GP Practice Clinical Governance Lead would conclude that the event will result in clear benefit for the PCN/GP practice and the NHS. It is unacceptable for the pharmaceutical industry to promote products at educational events which are not on the ICB (or place based) formularies
3. During dealings with sponsors there must be no breach of patient or individual confidentiality or data.
4. No information should be supplied to a company for their commercial gain and information which is not in the public domain should not normally be supplied unless there is a clear direct benefit to the NHS or patients.
5. Be aware that doctors' relationships with the pharmaceutical industry take many forms, some of which might be seen to influence the way doctors prescribe medicines⁵.
6. Joint working and sponsorship is based on mutual trust and respect. Pharmaceutical companies must comply with the ABPI Code at all times. All staff should comply with NHS and relevant professional body codes of conduct at all times. ([hwe-integrated-governance-handbook \(icb.nhs.uk\)](#) section 5.22.6).
7. Industry sponsorship must not be used for speakers at ICB funded protected learning time. Other educational events should prioritise experts within the ICS as the first option rather than sponsorship.
8. If ICB or place based guidance exists all medication promotion should highlight the use of their products in the place they are within the local guidance. (so for example if it is second choice or for a niche indication this should be clear).

Please contact hweicbhv.medicinesoptimisationteam@nhs.net with any queries

² 'Commercial sponsorship' refers to an arrangement where the ICB receives financial support or support in kind for staff, research, training, equipment, premises or conferences.

³ 'Joint working' is defined as: Situations where, for the benefit of patients, organisations pool skills, experience and/or resources for the joint development and implementation of patient centred projects and share a commitment to successful delivery. Joint working agreements and management arrangements are conducted in an open and transparent manner.

⁴ https://www.gmc-uk.org/-/media/documents/gmc-guidance-for-doctors---financial-and-commercial-arrangements-and-conflicts-of-interest_-58833167.pdf

⁵ Medicines and Healthcare products Regulatory Agency's [Blue Guide](#)