GMMMG Policy:
Engagement with the Pharmaceutical Industry

Seeking to
identify and champion
the appropriate use of drugs
across Greater Manchester
Engagement with the Pharmaceutical Industry

Purpose:
This policy sets out the principles and standards which should be applied when the GMMMG and its officers engage with the Pharmaceutical Industry. This policy covers GMMMG and its two subgroups: The Interface Prescribing & New Therapies Subgroup (IPNTS) and the Formulary Subgroup (FS). These same principles and standards should apply equally to sponsorship by other profit making organisations and also non-profit-making or charitable organisations.

1. Introduction

1.1. The DH Guidance published in 2008 encourages NHS organisations and their staff to consider opportunities for joint working with the pharmaceutical industry, where the benefits that this could bring to patient care and the difference it can make to their health and well-being are clearly advantageous. Such advantages need to be clearly stated and evidence presented to support these claims.

1.2. In the past, contact between the Pharmaceutical Industry and primary health care professionals have revolved around the purchase or promotion of specific products and the provision of sponsorship e.g. to support educational events or training. More recently, the Industry has begun to focus on enhancing its links with the NHS. Many companies have developed internal structures to encourage closer liaison with GP practices, CCG Boards and health care professionals working for CCGs or CSU’s.

1.3. Although the NHS and pharmaceutical companies already work together in a number of ways, there are tensions that can create barriers to effective partnerships. Many in the NHS are suspicious that pharmaceutical companies will exploit their intellectual assets for profit, while pharmaceutical businesses are understandably focused on safeguarding their investments in research and development, and ensuring a return.

1.4. It is essential therefore that all projects or dealings with the Industry are open and transparent and are subject to the widest scrutiny to enable likely pitfalls to be highlighted at an early stage.

1.5. The Greater Manchester Medicines Management Group (GMMMG) and its officers interact with the Pharmaceutical Industry in three main ways:

- Source of information on medicines.
- Source of sponsorship for education meetings, conferences, training, and education materials.
- Partnership Working on GM wide projects.
2. Main Principles

2.1 In line with the NHS Code of Conduct three public service values underpin the work of the NHS:

- **Accountability** – everything done by those who work in the NHS must be able to stand the test of parliamentary scrutiny, public judgements of propriety and professional codes of conduct;
- **Probity** – there should be an absolute standard of honesty in dealing with the assets of the NHS. Integrity should be the hallmark of all personal conduct in decisions affecting patients, staff and suppliers, and in the use of information acquired in the course of NHS duties; and
- **Openness** – there should be sufficient transparency about NHS activities to promote confidence between the organisation and its staff, patients and the public.

2.2 In addition where GMMMG or its officers enters into any joint working ventures with the pharmaceutical industry, their conduct should also adhere to the following values:

- Transparency and trust
- Appropriateness of projects
- Patient focused
- Value for money
- Reasonable contact
- Responsibility
- Impartiality and honesty
- Truthfulness and fairness.
- Compliance with the GMMMG Declarations of Interest Policy.

3.1 A key role of the Pharmaceutical Industry is to provide useful information on new and existing medicinal products. However it is not possible to meet with all pharmaceutical industry representatives to discuss all products.

3.2 Therefore the following process for engagement has been devised:

a) The GM CSU and/or the RDTC (Wolfson unit) will be the main point of contact for all Pharmaceutical Industry representatives wishing to discuss information pertaining to medicinal products. Any pertinent information will then be disseminated to the relevant groups or persons.

b) For horizon scanning or information around new drugs please contact the RDTC prescribing support team; for all other information relating to existing drugs or recommendations please contact the GM CSU medicines management team.

c) Initially representatives will be asked to send information for consideration via email either to the GM CSU medicines management team or the RDTC prescribing support team rather than setting up a meeting. This ensures a more effective use of staff time. Information should be as detailed as possible, for example to include, published clinical trial data including safety, cost impact and any educational material to be left with GPs and Community Pharmacists. This allows GMMMG and its subgroups to identify which medicines should be included within work plans at an early stage and will allow a full discussion of the product in question.

d) Following this if a meeting is deemed necessary then representatives will be seen by appointment only and only when the product they wish to discuss has been identified as being a priority for Greater Manchester. Meetings will be arranged directly with RDTC or GM CSU staff.

3.3 Information may be used in one of two ways.

- For horizon scanning purposes to inform whether a product is added to the work plan for discussion by GMMMG. This information request will normally be from the GM CSU medicines management team or the RDTC professional secretaries to the GMMMG IPNTS or FS.

- To inform a review or evaluation document; this will be used by the GMMMG or its subgroups to help make a decision around use of the product. The review will be written by RDTC prescribing support team who will request clinical trial data or cost impact information. This will normally be requested via email.

For information on the process to follow regarding a rebate schemes please see Good Practice Guidance on Rebate Schemes or contact the GM CSU medicines management team.
3.4 Presentation of Information at GMMMG/GMMMG Subgroup meetings.
Due to time constraints Representatives will not be able to present information directly to GMMMG or GMMMG subgroup membership. All information will be disseminated via the GM CSU medicines management team or the RDTC as described above.

3.5 New Drug or Formulary Applications.
Applications (for discussion of a new drug or addition or changes to the formulary) cannot be made by the pharmaceutical industry. All applications received must be made by healthcare professionals working within Greater Manchester; this is to ensure that any medicine discussed has been identified as being of clinical relevance and a priority to the Greater Manchester health economy.

3.6 Decision Making.
Decisions around which drugs are recommended or included within the formulary are made on the best available evidence. GMMMG will promote treatments for which there is good evidence of clinical effectiveness in improving the health status of patients and will not recommend a treatment that is shown to be ineffective. Where possible the group will compare the cost of a new treatment to the existing care provided and will also compare the cost of the treatment to its overall benefit, both to the individual and the community. Treatments that have been shown to produce an improvement in patient related outcomes will be prioritised over those that don’t. For further details around how decisions are made please see terms of reference for individual groups.

3.7 Commenting on draft recommendations/formulary chapters.
Once a recommendation/formulary chapter has been drafted GMMMG and its subgroups will follow the consultation processes outlined within their terms of reference. The consultation process for updates to the GMMMG formulary includes a period of time where the Industry (and other interested groups) is able to comment on the recommendations contained within. As the formulary includes all IPNTS and GMMMG recommendations it is envisioned that it is via this process that comments from the Industry regarding these recommendations will be facilitated. Therefore there is no separate process for Pharmaceutical Companies to comment on recommendations made either by the GMMMG or its Interface Prescribing & New Therapies Subgroup. All subgroups are however happy to receive comments relating to notification of incorrect information, addition of safety content or details of new data that may not have been considered at the time of the recommendation. Please forward these to the Chair or Professional Secretaries of the group/subgroup in question. (See GMMMG website for further details)
4. Sponsorship of Educational Meetings or the GMMMG Conference

4.1 GMMMG may on occasion organise educational events and if so may wish to invite Pharmaceutical Industry sponsorship of educational events or the GMMMG conference, if their involvement is compatible with the GMMMG policies and/or recommendations.

4.2 Sponsorship will be in the form of having a promotional stand which will be visited by delegates during breaks in the programme. Sponsors may not have access to the educational event; however access to the conference will be permitted.

4.3 GMMMG will endeavour to offer all companies producing a relevant product an equal opportunity of providing sponsorship for meetings and educational events.

4.4 Where pharmaceutical companies are offered a stand to provide medical information a standard fixed fee will be agreed and applied equally to all companies.

4.5 Ideally GMMMG would prefer that Companies promote mainly products included in the GMMMG Formulary or those that have been approved for use within the Greater Manchester Health Economy.

4.5 Please note that sponsorship of a speaker at a meeting will not give a pharmaceutical company the right to choose the speaker or decide on the content of the talk or session.
5. Sponsorship of Joint Projects

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’

5.1 There may be occasions where the Pharmaceutical Industry can provide resources which can help GMMMG achieve its targets whilst also providing benefit to the company.

5.2 Where such collaborations are being considered then the proposal must be presented (by a GMMMG representative) at a full GMMMG meeting for approval before any agreement is made. Legal advice may also be necessary. GMMMG will retain control of all projects.

5.3 GMMMG or its officers will not agree to practise under any condition that compromises professional independence or judgement, or imposes such conditions on other health care professionals.

5.4 Pilot projects will be used, where feasible, to further assess the suitability of the projects for joint working before any longer term arrangements are made.

5.5 There will be a “specific agreement” for each joint venture which will contain information on the points below. These will be presented in full to a GMMMG meeting.

- What the pharmaceutical company will provide
- What GMMMG or its constituent CCGs will provide
- The benefits for the pharmaceutical company
- The benefits for the GM Health Economy
- The time scale for the venture, with a break clause should the agreement fail to reach expectations.

5.6 If any of the “specific agreements” are broken then the joint venture will be terminated immediately.

5.7 Each company that enters into a joint venture with GMMMG will be acknowledged for resources provided; however GMMMG will not endorse a particular product or company as a result of the joint venture.
6. References

6.1 Commercial sponsorship: Ethical standards for the NHS (Department of Health)

6.2 Moving beyond sponsorship: Interactive toolkit for joint working between the NHS and the pharmaceutical industry (Department of Health /Association of British Pharmaceutical Industries (ABPI))