

Position Statement for GP practices considering accepting support provided by the Pharmaceutical Industry via MEGS/therapy review services

Summary:

From time to time GP practices may be approached directly by pharmaceutical companies to take part in therapy review services. The Medicines Optimisation team are usually asked to advise on the possible benefits and risks of accepting offers of therapeutic review services from the industry but sometimes this does not happen, which can lead unintended consequences.

- **GP practices in the CCG should consider adopting the following best practice guide when entering into discussions about joint working with Pharmaceutical Industry.**
- **We would strongly advise that practices seek the advice of CCG Medicines Optimisation team before agreeing to participate in therapeutic review services offered by third parties.**
- **This is especially the case where a therapeutic review service has not been considered, by the existing CCG “Working in Partnership with the Pharmaceutical Industry Policy Joint Working for the Benefit of Patients” governance arrangements**

The recommendations below cover therapeutic review services and not other promotional activities, or education sessions funded by pharmaceutical companies. It also does not cover where a therapeutic review service is introduced to the practice by the medicines optimisation team.

Recommendations:

Key considerations for the practice include:

- Will the therapy review service in question help to address a clinical priority for the practice or the CCG?
- What are the potential benefits and risks for patients and for the practice? –(e.g. is it likely that prescribing costs, pathology costs, referrals or admissions will change? Will patients have better health outcomes, be better informed about their condition or be inconvenienced in any way?)
- Ensure any recommendations that relate to medicines are in line with the local formulary approvals and pathways along with any national guidelines. Eg is the medication one that would generally be initiated by the GP in primary care? Does the therapy review service consider an already commissioned provider to provide healthcare?
- Is there a clear protocol in place for the management of this service? Are there clear Key performance indicators for the service
- What are the indemnity insurance arrangements for the industry personnel delivering the service?
- Ensure results of any work including ownership and next steps are agreed and signed up between the practice and the pharmaceutical industry.
- Is the printed material designed for use in relation to the provision of services non-promotional? Does the printed material also identify the sponsoring pharmaceutical company?
- Are arrangements for access to patient records consistent with other activities within the practice and other information governance arrangements?
- What is the timeline for the review?
- How will the service ensure there is a full audit trail in the patient notes should there be a need to review the patient?
- Who maintains clinical control i.e who is clinically authorising any interventions and how is this documented?
- If entering into this agreement have all key members of staff at the practice been made aware of this service?
- Is the CCG aware of this project?

Approved by July JPC Ratified by Kate Langford

Ratified Date: Aug 2022

Review Date: Aug 2024

A form (appendix1) is attached to the bottom of this document for use when considering entering into joint working with a company. Please return this form to kmccg.medicinesoptimisation@nhs.net for each therapeutic review service being offered by third parties. This is to ensure all governance has been considered and there are adequate monitoring and performance measures are in place.

Key background information

The Association of the British Pharmaceutical Industry (ABPI) Code of Practice for the Pharmaceutical Industry (July 2012) allows for medical and educational goods and services (MEGS) to be provided by pharmaceutical companies to healthcare organisations, such as GP surgeries and hospital departments, in order to enhance patient care and benefit the NHS. MEGS must not be provided to individuals or as an inducement to prescribe, supply, administer, recommend, buy or sell any medicine.

A therapeutic review (as distinct from a switch service) which aims to ensure that patients receive optimal treatment following a clinical assessment is a legitimate activity for a pharmaceutical company to support and/or assist. A genuine therapeutic review should include a comprehensive range of relevant treatment choices for the health professional and should not be limited to the medicines of the sponsoring pharmaceutical company. The decision to change or commence treatment must be made for each individual patient by the prescriber and every decision to change an individual patient’s treatment must be documented with evidence that it was made on rational grounds.

The provision of such services is strictly regulated through the ABPI Code of Practice the Code of Practice for the pharmaceutical industry is designed to ensure a professional, responsible and ethical approach to the promotion of prescription medicines in the UK through a self-regulatory system.

Appendix 1 – Working with the Pharmaceutical Industry

GP practice and HCP (DGS, East Kent, Medway and Swale or West Kent HCP). Practice lead and contact details	
Clinical area therapeutic service is being carried out for eg respiratory, diabetes etc	
Brief outline of work being carried out- should be provided by the company offering the service in a written protocol	
Name of pharmaceutical company sponsoring therapeutic review. Lead name and contact details	
Name of company carrying out therapeutic review on behalf of pharmaceutical company. Lead name and contact details	
When is the therapeutic review taking place?	
Have the recommendations in the position statement been taken into place by the practice before agreeing to take part in this review? (yes/no) If there are any queries about this please mention on returning the form	

Please return this form to kmccg.medicinesoptimisation@nhs.net