



Royal Pharmaceutical Society of Great Britain

Helping pharmacists achieve excellence

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Dear Mrs Simmonds

Re: Proposed amendment of the Code of Practice for the Pharmaceutical Industry and the Constitution and Procedure for the Prescription Medicines Code of Practice Authority

I am writing on behalf of the Royal Pharmaceutical Society of Great Britain in response to the above consultation.

The Society has welcomed the opportunity to respond to this consultation and has the following comments on the current Code and the proposed changes.

1) Clause 14:

We do not believe that the proposed amendments fully recognise the knowledge base of pharmacists in respect of medicines or take account of a pharmacist's professional obligations to only act within their competence, as required by the Society's Code of Ethics. In the current draft, the conditions under which UK pharmacists can operate in this capacity have been constrained in two important respects:

- The pharmacist has to be working under the direction of a registered medical practitioner. This continues to suggest that pharmacists have a lesser knowledge of medicines (including adverse effects) whereas the education and training of pharmacists makes them the specialists in medicines.
- The promotional material has to relate to products that have been on the market for more than one-year, and which are not part of a new and novel promotional campaign. This is altogether too restrictive because in practice it may be argued that for almost all cases, the product falls into the category of being part of a new promotional campaign. In addition, the "one year" criterion appears to be unrelated to the nature of the new product. These new products can range from a major first in class therapeutic agent through to a minor formulation or drug delivery change. To have the same 'sign-off' procedures for all of these scenarios is neither appropriate nor proportionate.

- 2) A member of the Society's Industrial Pharmacist Group has also raised the following concerns:
- The provision of economy air travel to delegates sponsored to attend meetings.
 - Clarification is also sought on the meaning of examination of non-interventional trials
 - The incentive to provide a voluntary admission is unclear.

I apologise for the delay in submitting this response. Please do not hesitate to contact me should you require further assistance.

Kind regards

Miss P Sejpal
Head of Professional Ethics