

PE1493/K

NHS Greater Glasgow and Clyde Email of 30 January 2014

Andrew

Some comments as requested.

Thank you for the opportunity to provide comments for consideration of the Petition Committee in relation to the proposal for a Sunshine Act for Scotland.

As you will be aware there is recognition that there is much in place with regard to capturing and maintaining such information. In addition to the general legislation and professional regulation, the SGHD "A common understanding" guidance forms part of NHS GG&C's Code of Conduct for Staff. This Code incorporates the online Register of Interest for staff via StaffNet and this has been maintained within NHS GG&C for over five years now (with a plan to renew the suitability of the current software). The NHS Board has also been subject to a number of FOI's in relation to these staff Register of Interests (which also include acceptance of gifts and hospitality, including that from the pharmaceutical industry).

There has been for some time a requirement for all NHS personnel to declare personal and non-personal interests at the start of any NHS Board meeting, Standing Committee meeting or other Committee/Group meeting within NHS GG&C. There are particularly robust arrangements around this for the Area Drugs and Therapeutics Committee and its supporting committee structure. That declaration also applies to the preparation of clinical guidelines and submissions of IPTRs.

A recently strengthened and more stringent ABPI code which requires member companies to establish transparent and auditable registration of all such payments and this is administered by the Prescription Medicine Code of Practice Authority which is itself a self regulatory body.

The online registration arrangements within NHSGG&C do not however, despite the requirements of the HDL (2003) 62, include arrangements for primary care contractors. This would need to be reviewed.

I think the concerns of the petition can be acknowledged and certainly there should be no room for complacency in terms of the transparency and accessibility of the type of information sought by the petitioner. There may be benefit in further SGHD guidance as a follow up to HDL (2003) 62 in order to promote good practice and consistency of approach and also to ensure there are checks and balances in place

to promote transparency and openness and adherence to completing registrations of interests as appropriate.

I hope this is helpful and thank you once again for the opportunity to share our thoughts with you.

Kind regards.

John C Hamilton
Head of Board Administration
NHS Greater Glasgow and Clyde