



Pharmaceutical Representative Management Across the South West Procedure

1. Guiding Principles

Due to the high use of medication in the hospital environment and initiation of medication in patients with chronic disease, hospital facilities are of significant commercial interest to pharmaceutical companies and their representatives.

WA Country Health Service (WACHS) South West (WACHS-SW) facilities can benefit from the interaction with pharmaceutical industry representatives through exposure to newly developed therapeutics and evidence, as well as potential pricing negotiations (in compliance with procurement guidelines).

Considering the complex nature of this public/ private interaction, a robust procedure is required to ensure WACHS-SW staff are not at risk breaching of the WA Health [Code of Conduct](#) while still providing access to hospital personnel by pharmaceutical representatives.

2. Procedure

The following procedure outlines the appropriate process to follow for interaction with pharmaceutical representatives. It considers both the access to the facilities and staff as well as the process required around potential acceptance of pharmaceutical samples.

2.1 Entry to WACHS South West sites and facilities

Pharmaceutical representatives are only permitted to enter the hospital to attend meetings or appointments that are already made with the approved staff. On entry to any facility, the pharmaceutical representative must register at front reception and provide the following information:

- Name of company and product
- Representative name(s)
- Contact number
- Staff member visited and department.

Representatives are required to wear a 'visitor' badge issued by front reception and are not permitted on wards or clinical areas.

2.2 Approved staff to accept appointments

Access of pharmaceutical industry representatives to WACHS-SW staff is restricted to senior staff who have a sound understanding of the intricacies of the relationship and governance structures in place around pharmaceutical availability.

2.2.1 Chief Pharmacist

By appointment made directly with the Chief Pharmacist. Appointments are generally restricted to newly marketed pharmaceuticals, clinical updates or price negotiations.

2.2.2 Consultant Medical Staff

Appointments with consultant medical/ surgical staff can be made with the Heads of Department administrative assistant.

2.2.3 Medical and Nursing Senior Management

Appointments with Regional Medical and Nursing Directors, Medical Directors and Co-ordinators of Nursing are to be delegated to the Chief Pharmacist.

2.2.4 Nursing staff and other Allied Health

Contact with other senior nursing staff (Nurse Unit Managers, Nurse Educators) must be by appointment only for continued education relating to medication that is available on the WACHS-SW Drug Formulary.

2.3 Entry of 'Sample' Medication into WACHS-SW facilities

- All medications used in the hospital must be on the WACHS-SW Drug Formulary (with the exception of existing patient own medications for ongoing therapy).
- Other than patient own medication and medications for MPS residential patients, all medication used within WACHS-SW facilities is purchased by WACHS-SW Pharmacy Department.
- Any offers of 'samples' are to be directed to the Chief Pharmacist only.
- 'Samples' of formulary medications may or may not be accepted at the discretion of the Chief Pharmacist. If accepted these 'samples' are to be delivered directly to the WACHS-SW Chief Pharmacist and will be added to the current stock holding.
- Any 'sample' provided that is not on the WACHS-SW Drug Formulary must go through the WACHS-SW Drugs and Therapeutics Committee process prior to use at any WACHS-SW facility.

2.4 Sponsored meetings

In accordance with the WA Health [Acceptance of Gifts Policy](#), WACHS-SW staff are not permitted to receive gifts from pharmaceutical companies. Product promotion is only permitted if there is a specific educational purpose and the representative is invited by an appropriate staff member who retains control of the event. The following provides guidance for the appropriate management of sponsored meetings:

- Sponsored meeting should be arranged in consultation with an authorised member of staff (see above)
- Pharmaceutical industry sponsorship is to be clearly declared and acknowledged
- 'Samples must not be offered or accepted as part of an educational event or meeting.

3. Definitions

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| Pharmaceutical Industry Representative | Employees of pharmaceutical companies to provide product information, answer questions on product use and deliver product samples aimed at persuading prescribing of solicited products. |
| Pharmacy | The WACHS-SW Pharmacy Department located at the Bunbury Hospital. |
| WACHS-SW Drugs and Therapeutics Committee (DTC) | Committee of appropriate delegates that meets monthly to manage the WACHS-SW Drug Formulary. |
| WACHS-SW Drug Formulary | The catalogue of medications that the WACHS-SW DTC have approved for initiation and administration with WACHS-SW facilities |

4. Roles And Responsibilities

Approved staff to accept appointments

These staff are responsible for ensuring that all interactions with pharmaceutical representatives follow the requirements set out in this procedure. They are responsible for informing new pharmaceutical representatives of these requirements and escalating any breaches of this procedure to the Chief Pharmacist.

All Staff

All staff are required to work within policies and guidelines to make sure that WACHS is a safe, equitable and positive place to be. Any staff member aware of a breach to this procedure should escalate this information to the Chief Pharmacist.

5. Compliance

It is a requirement of the WA Health [Code of Conduct](#) that employees “comply with all applicable WA Health policy frameworks.”

A breach of the Code may result in Improvement Action or Disciplinary Action in accordance with the WA Health [Misconduct Policy](#) or Breach of Discipline under Part 5 of the *Public Sector Management Act*.

WACHS staff are reminded that compliance with all policies is mandatory.

6. Evaluation

Incidents related to lack of compliance with the procedure target – zero (0). All incidents are to be reported to the Medication Safety Steering Committee, by the Clinical Governance Unit, for review.

7. Standards

National Safety and Quality Health Care Standards:

4.1.2 – Policies, procedures and/ or protocols are in place that are consistent with legislative requirements, national, jurisdictional and professional guidelines.

4.3.3 – Action is taken to increase the effectiveness of the medication authorisation system.

8. Legislation

Medicines and Poisons Act (2014), Western Australia

Poisons Regulations (1965), Western Australia

WA Pharmacy Act 2010

9. References

Child and Adolescent Health Service – Pharmaceutical Company Representative
Pharmaceutical Representative Management at FSH

WATAG Advisory Note – Guiding Principles for Managing Use of Medication Samples in Australian Public Hospitals.

10. Related Policy Documents

WACHS Gift Declaration Procedure

11. Related WA Health Policies

WA Health Code of Conduct.

WA Health Acceptance of Gifts Policy

**This document can be made available in alternative formats
on request for a person with a disability**

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