



Pharmaceutical representative management across the South West Procedure

Effective: 2 November 2021

1. Guiding Principles

The [WACHS Medication Handling and Accountability Policy](#) outlines the requirements for storage, ordering or requesting, recording, reporting discrepancies and accountability structures for medication management in WA Country Health Service (WACHS).

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. The provision of information by either appointment or via email / letter is governed by this procedure.

2.1 Entry to WACHS South West sites and facilities

WA Country Health Service is subject to Health Worker (Restrictions on Access) Directions (No 3) requiring all Health Care Workers to have evidence of COVID-19 vaccination in order to access a WACHS facility. This includes any third party who provides goods and services at the health care facility. It is the Pharmaceutical Companies responsibility to ensure that all pharmaceutical representatives have had the relevant vaccination evidence, and ensure the evidence is available on entry and/or on request.

Pharmaceutical representatives, whilst acting in that role, are only permitted to enter a WACHS-SW 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 / information

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 Regional Chief Pharmacist

By appointment made directly with the Regional Chief Pharmacist. Appointments are generally restricted to newly marketed pharmaceuticals, clinical updates or price negotiations. Information on these topics is also able to be sent to the Regional Chief Pharmacist via email.

2.2.2 Consultant Medical Staff

Appointments with consultant medical/ surgical staff can be made with the Heads of Department administrative assistant. Information is able to be sent to consultant medical/ surgical staff where they have given their approval to the specific pharmaceutical representative to do so.

2.2.3 Medical and Nursing Senior Management

Appointments with Regional Medical and Nursing Directors, Directorate Medical Directors and Nursing Directors / Coordinators of Nursing are to be delegated to the Regional Chief Pharmacist.

2.2.4 Education Sessions

Contact with other WACHS-SW clinical staff must be by appointment only for continued education relating to medication that is available on the State Medicines Formulary.

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

- All medications used in the hospital must be on the State Medicines 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 Regional Chief Pharmacist only.
- 'Samples' of formulary medications may or may not be accepted at the discretion of the Regional Chief Pharmacist. If accepted these 'samples' are to be delivered directly to the WACHS-SW Regional Chief Pharmacist and will be added to the current stock holding.
- Any 'sample' provided that is not on the State Medicines Formulary must go through the WACHS-SW Drugs and Therapeutics Committee governance process prior to use at any WACHS-SW facility.

2.4 Sponsored meetings

In accordance with the WA Health [Gifts Benefits and Hospitality 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.
- Any catering of these events needs to be declared via the WACHS gift register by the organising staff member.

3. Definitions

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 provide governance over the use of medications within WACH-SW.
‘Samples’	Includes any pharmaceutical product with active ingredient that is offered outside of authorised Pharmacy procurement processes.
Statewide Medicines Formulary (SMF)	The catalogue of medications that the WACHS-SW Drugs and Therapeutics Committee have approved for initiation and administration within WACHS-SW facilities.

4. Roles And Responsibilities

Approved staff to accept appointments / information

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 Regional 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 Regional Chief Pharmacist.

5. Compliance

It is a requirement of the WA Health Code of Conduct that employees “comply with all state government policies, standards and Australian laws and understand and comply with all WA Health business, administration and operational directives and policies”.

Failure to comply with this procedure may constitute a breach of the WA Health Code of Conduct (Code). The Code is part of the [Integrity Policy Framework](#) issued pursuant to section 26 of the [Health Services Act 2016](#) (WA) and is binding on all WACHS staff which for this purpose includes trainees, students, volunteers, researchers, contractors for service (including all visiting health professionals and agency staff) and persons delivering training or education within WACHS.

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

6. Records Management

All WACHS corporate records must be stored in the approved Electronic Documents and Records Management System.

[Records Management Policy](#)

7. Evaluation

Monitoring of compliance with this document is to be carried out by the approved staff to accept appointments / information annually as part of their Employee Development processes.

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

8. Standards

[National Safety and Quality Health Care Standards: 4.1](#)

9. Legislation

[Medicines and Poisons Act \(2014\)](#), Western Australia

[Poisons Regulations \(2016\)](#), Western Australia

[WA Pharmacy Act 2010](#)

10. References

[WATAG Advisory Note – Guiding Principles for Managing Use of Medication Samples in Australian Public Hospitals.](#)

11. Related Forms

Nil

12. Related Policy Documents

WACHS [Gift Declaration Procedure](#)

WACHS [Medication Handling and Accountability Policy](#)

13. Related WA Health System Policies

MP 139/20 [Medicines Handling Policy](#)

MP 0124/19 [Code of Conduct Policy](#)

MP 0136/20 [Gifts Benefits and Hospitality Policy](#)

14. Policy Framework

[Clinical Governance, Safety and Quality](#)

**This document can be made available in alternative formats
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