



Royal Pharmaceutical Society of Great Britain

Helping pharmacists achieve excellence

Director
Prescription Medicines Code of Practice Authority
12 Whitehall
London
SW1A 2DY

RUTH WAKEMAN
HEAD OF PROFESSIONAL SUPPORT
Telephone: 0207 572 2615
E-mail: ruth.wakeman@rpsgb.org

13th August 2010

Dear Sir/Madam,

Re: Proposals to amend the ABPI Code of Practice for the Pharmaceutical Industry 2008

Please find below the response of the Royal Pharmaceutical Society of Great Britain to the above consultation. This response has been prepared by the professional arm of the Society following specialist input from the Industrial Pharmacists Group.

The Royal Pharmaceutical Society of Great Britain is currently the professional and regulatory body for pharmacists in England, Scotland and Wales. Following the publication in 2007 of the Government White Paper Trust, Assurance and Safety - The Regulation of Health Professionals in the 21st Century, the Society is working towards the demerger of its regulatory and professional roles. This will see the establishment of a new General Pharmaceutical Council and a new Professional body in September 2010.

The objectives of the Society are to represent the pharmacy profession and to promote our policies and views to a range of external stakeholders. We strive to lead and support pharmacists and to assist in their development and to promote the advancement of science, practice, education and knowledge in pharmacy.

Proposed amendment of clause 14.1 and supplementary information

The 2008 ABPI Code of Practice requires the certification of promotional and other materials by two individuals who are registered with the MHRA and PMCPA. Currently one of the two signatories must be a medical practitioner, dentist or a pharmacist but a pharmacist can undertake this role only in very limited situations and only then if they are 'under the direction of' a medical practitioner.

Pharmacists are professionals who are aware of their professional responsibilities and committed to patient care. The Society therefore welcomes the proposals to change clause 14 allowing pharmacists to act as primary approval signatories with a similar status to medical practitioners. This corrects an illogical situation and recognises the skills, training and knowledge of pharmacists as experts in medicines.

The Society would also like to point out that an anomaly remains in the new proposed text. The code treats pharmacists, dentists and medical practitioners differently in that medical practitioners must be simply 'registered' (i.e. in any country) whereas pharmacists must be 'practising UK registered' and dentists seem not to have to be registered, practising or UK registered. We believe that the requirement to be practising and UK registered is appropriate and question why this should not also be applied to medical practitioners and dentists.

We hope these comments are useful.

Thank you for contacting the Society.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ruth Wakeman', written in a cursive style.

Ruth Wakeman MRPharmS

Head of Professional Support