

Potential risks for GP surgeries to consider when working with private organisations

The purpose of this document is to advise GP surgeries on the potential risk of accepting offers, including medication review services and medical devices, from the private sector. **Practices are advised to contact the CCG MMT before signing contacts, in particular to avoid contradictory product outcomes for patients.**

GP surgeries should consider:-

- Will the service in question help to address a clinical priority for the practice?
- That the company and any sponsored healthcare professionals adhere to the ABPI Code of Practice¹
- What are the potential benefits/risks for the patients and for the practice? For example:
 - 1) Will patients be better informed about their condition or be inconvenienced in any way?
 - 2) Will patients have better health outcomes?
 - 3) Will prescribing costs be affected?
- Are arrangements for access to patient records consistent with other activities within the practice and other information sharing arrangements?
- How will the practice ensure that the staff are guided by robust impartial evidence?

Risk 3

Critical incidents.

Mitigation: Ensure explicit agreement with the private organisation as to how critical incidents are resolved. Private organisation to provide an assessment of the risks and benefits of the medication review service and medical devices on offer.

Risk 2

Drugs not compliant with local formulary.

Mitigation: Check local formulary and traffic light system to ensure all medication review services, and medical devices, are in line with locally approved guidelines, [local formulary and traffic light system](#).

Risk 1

Patient complains about the drug/device.

Mitigation: The involvement of a private organisation in medication review services, and medical devices, should be made clear to patients. Ensure explicit agreement with private organisation as to how complaints are dealt with. Where DCCG MMT has endorsed the work complaints can be made to Donccg.complaints@nhs.net

Risk 5

Private organisation promotes own products.

Mitigation: Ensure agreement with private organisations that their service and any promotion of their products are in the best interest of the patient and consistent with national and local recommendations for example NICE, [local formulary and traffic light system](#)

Risk 4

Medication review service on offer, including medical devices, requires direct patient contact/ identification of patients from patient records with work being undertaken by a medical representative.

Mitigation: Ensure appropriately qualified person for example registered nurse/pharmacist are undertaking activities that involve patient contact and /or patient identification.

Risk 7

Patient confidentiality at risk.

Mitigation: Ensure compliance with practice Information governance standards.

Risk 6

Company may not have clinically robust SOPs.

Mitigation: All clinical and prescribing policies/guidelines should be based on current evidence-based medicine and cost-effectiveness and be consistent with national recommendations for example NICE.

Resources:

1. [The ABPI Code of Practice](#) for the Pharmaceutical Industry 2019
2. Department of Health- Best Practice Guidance on Joint

Working between the NHS and the Pharmaceutical Industry, 2008 https://www.networks.nhs.uk/nhs-networks/joint-working-nhs-pharmaceutical/documents/dh_082569.pdf

3. GMC Good Medical Practice Guidelines 2013 https://www.gmc-uk.org/-/media/documents/Good_medical_practice_English_1215.pdf_51527435.pdf