

Dr Peter Gordon

Email: request-163099-d1bf8032@whatdotheyknow.com

Date: 22 July 2013

Your Ref:

Our Ref: 389 Review

Enquiries to: S Twaddle

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Dear Dr Gordon

## **Pharma payments – review of FOI 389**

Further to your email of 25 June appealing against this organisation's response to your freedom of information (FOI) request, a review was held on Friday 12 July.

### Background

In your freedom of information request of 29 May, you wrote:

*'Hospital Boards are reportedly meant to keep a register of payments from pharmaceutical companies (and other relevant companies) to staff, in case of conflicts of interest [1]. I am requesting a copy of the register for this Board - which I would hope includes details of all relevant payments to staff and any related potential conflicts of interest. If it would be possible to have this information in an appropriate structured data format - for example, a CSV file - this would be helpful. If this Board does not have a complete register, I would request: the release of the information on this topic that the Board does hold; and an explanation of why the Board does not hold a complete register.'*

On 20 June we responded as follows:

### 'All Healthcare Improvement Scotland staff

*There is a nil return on staff receiving payment from a pharmaceutical company. This return includes staff working in both the Scottish Intercollegiate Guidelines Network (SIGN), and Scottish Medicines Consortium (SMC).*

*Please find attached the register for financial year 2013 to 2014...[ ]*

*Please also find our employee code of conduct attached. Section 35 sets out the conditions on accepting additional employment...*

### Board members' register of interests

*Please find attached for information the register of interests for financial year 2013 to 2014. The register includes senior staff members, and it should be noted that for this group there is no pharmaceutical company-related return:*

*This information is also available online, along with the Board members' code of conduct, at:*

*[www.healthcareimprovementscotland.org/about\\_us/our\\_board.aspxs](http://www.healthcareimprovementscotland.org/about_us/our_board.aspxs)*

### Review request

Your email of 26 June said:

*'You are confirming under FOI that none of your NHS employees for HEALTHCARE IMPROVEMENT SCOTLAND have received NO payments from Pharmaceutical Industry or Pharmaceutical Sponsored Education? It is very important that we are clear with the public on this, as given longstanding roles of Scottish Intercollegiate Guidelines Network (SIGN), and Scottish Medicines Consortium (SMC). For this reason I am requesting an Internal Review.'*

On Friday 19 July I reviewed the information relating to the request, Scottish Information Commissioner guidance, information from the Healthcare Improvement Scotland FOI officer, together with your comments, following the process set out in our FOI policy.

### Review decision

The response of 20 June included the corporate register of hospitality for financial year 2013 to 2014, covering all Healthcare Improvement Scotland staff, and gave a nil return on payments to staff from pharmaceutical companies.

I can confirm there is a nil return for Healthcare Improvement Scotland staff recording payment from a pharmaceutical company during financial year 2013 to 2014. All HIS employed staff working in SIGN and the Scottish Health Technologies Group (SHTG), and HIS-employed health economists who work with SMC make an additional annual declaration of any competing interests. These declarations of interest include information on any payments to the individual and their close relatives

These staff groups also had a nil return on payments from pharmaceutical firms for financial years 2011 to 2012 and 2012 to 2013.

The hospitality register for financial year 2012 to 2013 records a nil return for staff payment by a pharmaceutical company. The sources of hospitality and gifts value in that year were: Kalvar County Council, Sweden (£155); BMJ Group (Euros 50);

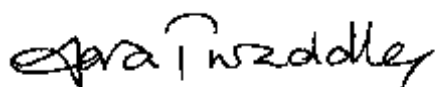
Institute for Healthcare Improvement (£30); South Korean academic delegation (£60); and Marketing Scotland £30.99).

The hospitality register for financial year 2011 to 2012 records a nil return for staff payment by a pharmaceutical company. The sources of hospitality and gifts in that year were: Finnish guideline developers (£20); Communications supplier (£5); haa design (£10); Conscia (£400 – prize won in open draw at annual national NHS Scotland conference).

Your questions which accompanied the review request are being processed by the Finance unit as freedom of information request 401.

Please don't hesitate to contact me if you would like to discuss any aspect of this response.

Yours sincerely



**Dr Sara Twaddle**

Head of Evidence & Technologies / Director of SIGN (reviewer)

### **If you are dissatisfied with this review**

Please note that if you are dissatisfied with the outcome of the review, under Section 47(1) of the Freedom of Information (Scotland) Act 2002 you have the right to appeal to the Scottish Information Commissioner. For further information on your right please see page 30 of the Scottish Information Commissioner's booklet 'Your right to know – FOI rights and how to use them':

[www.itspublicknowledge.info/YourRights/YourRights.asp](http://www.itspublicknowledge.info/YourRights/YourRights.asp)

We can also email or post you a copy of this booklet.

Contact details for the Scottish Information Commissioner:

Office of the Scottish Information Commissioner  
Kinburn Castle  
Doubledykes Road  
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