Directorate of Finance

SALES REPRESENTATIVES POLICY

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1.0 Purpose

1.1 The purpose of this policy is to set clear guidelines for the conduct of Sales Representatives and Trust staff in relation to the procurement of goods and services.

1.2 Introduction and Scope

1.2.1 The Northern Lincolnshire & Goole NHS Foundation Trust appreciates the role that Healthcare companies play to assist health practitioners in providing safe, effective and economic products and services to the patients in their care. The introduction of new drugs/products can however place unplanned pressures on budgets and may compromise patient care. These must be planned through the appropriate Trust process.

1.2.2 It is important that the relationship between companies and the Trust is transparent and well managed. The purpose of this paper is to present a sales representatives Policy and Procedure that supports both clinical innovation and financial stability on a sound and professional basis.

1.2.3 The following guidance notes identify the key aspects of the policy regarding the relationship between sales representative and clinicians, ward and departmental staff.

2.0 Area

This policy applies in all areas of the Trust. It is aimed at sales representatives and all employees of the Trust, regardless of position held, be they permanent or temporary and all secondees and contracted out staff working within the Trust. It also applies to volunteers acting on behalf of the Trust, trainees, apprentices and those on work experience.

3.0 Duties

3.1 It is recognised that, in addition to providing information to health practitioners, the prime function of company representatives is to promote and sell their products and services. This function should be carried out in a proper and ethical manner and must not contravene Trust, NHS or government policies.

3.2 If this policy is breached, representatives may be removed or barred from site or, reported to company, commercial/professional organisations if codes of practice are breached, e.g., Association of British Pharmaceutical Industry (ABPI) and Association of British Healthcare Products Industry (ABHI).

4.0 Visits to Hospital Sites

4.1 Representatives may not enter any clinical or non-clinical areas (including wards and out-patient areas) or visit the Procurement department without an appointment. To make an appointment with a member of the Procurement department, please see contact points/details listed at the end of this document, an updated list can always be found at: http://www.nlg.nhs.uk/about/trust/procurement/#contact-details
4.2 Sales representatives and medical equipment representatives should sign in with the Medical Engineering department on arrival, to be issued with a visitors permit. Failure to comply with this requirement may lead to the representative or the company he/she is representing being banned from Trust sites.

4.3 A representative arriving for an appointment must arrange to be met by the host.

4.4 Sales representatives wishing to discuss drugs or medications should deal with the Pharmacy department under the guidelines set out as part of the Medicines Code. The relevant sections are copied in Appendix A for reference.

4.5 Should any emergency situation arise whilst on a hospital site, e.g. a fire alarm, all representatives must obey any instructions given to them by Trust staff.

4.6 No unauthorised visits to Trust departments are permitted.

4.7 The Procurement department can provide advice on who to contact to arrange appointments but it remains the representative’s responsibility to arrange these. Sales representatives and technical representatives calling without an appointment will be turned away but will be able to leave information at the Procurement or Pharmacy departments.

4.8 All companies that are maintained on the Trust’s active supplier system (Integra) have been sent a copy of this policy and are expected to ensure their staff comply with its contents. Any sales representative from a company not on the Trust’s active supplier system is expected to provide full contact details to one of the Strategic Procurement team staff in the table at section 13 so this policy can be forwarded to them.

4.9 The Trust will investigate the use of supplier accreditation badges to support the effective management of sales representatives visiting Trust sites.

5.0 Personal Appointments

Representatives may only seek an appointment where there is a valid reason for the visit, to meet with departmental managers, clinical and medical staff or an open meeting with medical and/or nursing/pharmacy staff in a group. The Trust’s expectation is that such meetings are educational and not entirely promotional. Junior Doctors and Pharmacists should not be bleeped to make appointments.

6.0 Promotional Activity

6.1 Representatives should be well informed about the products that they are promoting, in addition, standard technical, and where appropriate, clinical data, including information on product effectiveness should be available.

6.2 Where any teaching and/or promotional activity is planned, representatives must advise the department Manager and the Procurement department. The intent of the meeting must not contravene/challenge existing Trust policies.

6.3 Leaflets and posters produced by representatives must not be distributed or displayed in clinical areas unless approved in writing by the Associate Chief Operating Officer for that area.
7.0 Medical Equipment

7.1 All trials of products and/or equipment MUST be arranged through one of the key personnel with whom the appointment is made. Authorisation of a product and/or equipment trial by the key personnel involved automatically places the responsibility with that member of the Trust’s staff, to ensure that insurance indemnity and technical safety vetting procedures are complied with.

7.2 Trials for any “point of care testing devices” must be approved by the Trust’s Point of Care Testing Committee. Where completed trials have been successful, final approval for implementation of any pathological/physiological point of care systems must be via the Trust Point of Care Testing Committee.

7.3 Prior to the use of any loan, trial or demonstration equipment the Trust’s Medical Engineering department must be informed in advance in order that appropriate safety testing can be carried out and the relevant Indemnity Form completed.

7.4 The Trust’s Facilities department must also be duly notified of any domestic electrical appliance on site that requires appropriate testing before use.

7.5 Under no circumstances must any equipment of an IT nature i.e. hardware/software be left on site without prior written approval of a senior member of the Trust’s IT department.

7.6 No nutritional products must be left on site without prior written approval of the Trust’s Dietetic department.

7.7 No clinical products outside of the above must be left on any site/department without the prior written agreement of the Procurement Clinical Nurse Specialist.

7.8 No other product outside of the above should be left on site without the prior written agreement of the Procurement department.

7.9 These procedures apply to ALL Electrical, Electro-Medical, Mechanical and Laboratory equipment involved.

7.10 Indemnity

No goods must be left on site without the relevant insurance indemnity form being completed and signed by the company representative and a member of the Trust’s Medical Engineering department staff. The Indemnity Form must be retained in the user department in accordance with the Trust’s document retention policy/procedure and be made available for examination by internal/external audit as required. In the event of any doubt as to the requirement for an indemnity form to be completed contact Procurement, Medical Engineering, Facilities or IT at the Trust as appropriate.
8.0 **Supplier Representatives and Operating Theatre Department**

8.1 The aim of the Operating Theatre and staff is to provide and maintain high standards of patient care during surgical procedures. Supplier representatives must appreciate and recognise this as a priority. This policy is an effective risk management tool, which will control the access of supplier representatives to the Operating Theatre department's at the Trust. The following must be observed:

- An email prior to visiting the Operating Theatre must be made detailing the purpose of the visit and who they are visiting
- No cold calling will be permitted
- No removal of stock without express written permission and documentation, removal of consignment stock is detailed further below
- No supplying stock without prior approval
- Adhere to sterilisation processes/requirements as set by our Sterile Services provider Synergy, for example, tray contents, decontamination records, manufacturing instructions and providing the equipment in appropriate containers
- All supplier representatives will gain permission prior to entering the Operating department, from the Theatre Manager or Deputy Theatre Manager
- On arrival at the Operating Theatre department, supplier representatives must report to the Theatre Receptionist, stating who they are and with whom their visit has been authorised. Photo identification must be produced at this stage
- The Theatre Visitors’ Signing-in-book: this must be signed by all supplier representatives (time in and out of the theatre department) in order to comply with fire safety regulations
- Supplier representatives will be provided with appropriate operating theatre attire and instructed on how it should be worn. Representatives must NOT wear their own operating theatre attire for infection control reasons. Representatives must not take any personal bags into clinical areas
- Supplier representatives will be supervised by a named member of the Theatre staff throughout their visit to the Operating Theatre department
- Supplier representatives are reminded that all procedures within the Operating Theatre department are confidential in nature and that any information, discussions, technical details or documentation must be treated as such (supplier representatives will only enter the theatre room with the operating surgeon's permission once the patient is asleep and draped, in order to maintain the patient’s dignity)
- Informed patient consent must be obtained (before the anaesthetic is administered) authorising the supplier representative to be present in the Operating Theatre observing/ demonstrating/ commissioning equipment
• Any supplier representatives gaining access to the Operating Theatre department, to provide technical assistance during a surgical procedure, to observe, demonstrate, in service or commission equipment or products, must produce evidence of a recognised qualification, e.g. TAQ (Theatre Access Qualification), which states that they are competent to do so, prior to entry. They must also produce a company Indemnity Insurance certificate, before they will be allowed to scrub-up. A member of the theatre scrub team must be present while the supplier representative “scrubs up” to assure that aseptic techniques are adhered to at all times.

• Whilst in the Operating Theatre, supplier representatives must seek permission to speak to the surgeon via the scrub nurse. Noise levels, including communication should otherwise be kept to a minimum. All medical products must be handed to scrub nurse and not directly to the surgeon.

• In the event of a surgical emergency, the supplier representative will be asked to leave the Theatre and must comply with instructions given.

• The supervising member of the theatre staff will ensure that the supplier representative does not act or move in such a way as to contaminate the sterile area.

• Should a supplier representative feel unwell whilst in an Operating Theatre, they should immediately inform a member of the theatre staff who will take the appropriate form of action.

• Supplier representatives must behave professionally at all times. If the nurse in charge deems their behaviour unprofessional, at any time, they will be asked to leave the Operating Theatre department and their conduct reported to their company management to take appropriate action.

8.2 Consignment Stock

8.2.1 Consignment stock is defined as an inventory of goods, materials or spare parts that are held, by agreement with the supplier, in the possession of the buyer. Whilst the goods are in the physical custody of the buyer, they remain the property of the supplier and are paid for as the buyer issues them (Chartered Institute of Procurement and Supply).

8.2.2 Should a supplier’s representative wish to add or remove consignment stock from the Operating Theatre department, they are required to request this in writing at least seven working days before addition or removal. This request should be sent to the Materials Management Supervisor, Higher Procurement Officer and Theatre Manager (for the respective site).

8.2.3 The addition or removal of consignment stock should be co-ordinated with the Materials Management Supervisor and Higher Procurement Officer to ensure stock levels are adjusted once the goods are removed. The Theatre Manager (for the respective site) should be fully briefed on any changes.

8.2.4 Once the change has been made, the supplier representative is expected to confirm in writing the revised consignment list. This should be done in conjunction with the Theatre Manager and Higher Procurement Officer to ensure all parties are in agreement with this information.
8.2.5 Goods must not be removed until consent is provided by Procurement. This is to ensure safe stock levels are maintained within the Operating Theatre department environment.

9.0 NHS Conditions of Contract

9.1 All goods (donated or otherwise) and services offered to the Trust will be procured against the standard NHS Conditions of Contract; these include the following conditions, which are also applicable to items supplied on loan that will require Indemnity Agreement being signed by both the supplier and the Trust.

9.1.1 Conditions 12 and 13 – Indemnity

This ensures that the Trust is given protection of an unlimited obligation on the part of the supplier to pay compensation for damage or injury to persons or property. This is in addition to any specific rights under the contract or under statute or common law. Condition 28 covers consequential loss and relates only to defective goods, delivery and unloading.

9.1.2 Condition 14 – Insurance

This follows on from conditions 12 and 13 and imposes an obligation to insure against the liabilities resulting from that indemnity. It specifies a minimum sum for insurance cover in respect of each year.

9.2 Purchase Orders

9.2.1 Commitment to purchase goods and services is only entered into by the raising of an official Trust Purchase Order. Suppliers must not deliver goods or provide a service without first receiving an official Trust Purchase Order.

9.2.2 Any goods or services received without an official Purchase Order will be accepted on the basis of “Free Goods” and any subsequent invoices will be returned for a full credit. Therefore suppliers must ensure they receive an official Trust purchase order number prior to providing goods and/or services, and this must be quoted on all invoices to ensure smoother payment.

9.2.3 Products to be trialled should be provided free of charge, this condition may be waived on occasion by the Procurement department. Prior agreement must be sought in writing if the supplier intends to charge for items on trial – this would be covered with an official purchase order.

9.2.4 A purchase order should be raised for any consumables which are to be used on equipment which has been provided on loan/trial.

10.0 Signing of Contracts / Agreements

10.1 The nominated officers with the authority to sign contracts and agreements on behalf of the Trust are as detailed in the Trust’s Scheme of Delegation.

10.2 Any agreement not signed in line with the Scheme of Delegation will be considered null and void as the signatory will not have the required authority to enter into the agreement.
10.3 **Pricing**

10.3.1 Staff and suppliers are reminded that commercial pricing information is confidential. This must be borne in mind especially when discussing rival suppliers and their products and prices. Prices from rival suppliers must not be disclosed, in line with the Trust’s Standards of Business Conduct Policy (specifically section 14 – Commercial in Confidence).

10.3.2 Sales representatives must not place any pressure on any Trust staff to discuss competitors pricing. All pricing discussions/negotiations must be held with the Strategic Procurement Team once it has been established that the product is fit for purpose.

11.0 **Code of Ethics / Standards of Business Conduct**

11.1 This policy should be read in conjunction with the Trust’s Standards of Business Conduct Policy which is firmly based upon the ‘Standards of business conduct for NHS staff’, (HSG(93)5) and guidance contained within the document ‘Commercial Sponsorship – Ethical Standards for the NHS’ (issued November 2000) and applies to all staff. The purpose of the Trust’s Standards of Business Conduct Policy is to ensure that all employees of the Trust maintain the highest standard of public accountability and are open and transparent in their business conduct. The policy details how staff should deal with offers of gifts, hospitality and sponsorship from suppliers or potential suppliers, to ensure that they are not placed in a position which renders them liable to prosecution (in line with the Bribery Act 2010; the Fraud Act 2006 or the Human Medicines Regulations 2012) or subject to internal disciplinary proceedings.

11.2 A number of the pertinent points from the Standards of Business Conduct Policy which could be linked to staff involvement with suppliers representatives are reproduced here for information, but staff should refer to the complete Policy (available on the Trust intranet) for further details:

- refuse gifts, benefits, hospitality or sponsorship of any kind which might reasonably be seen to compromise your personal judgement or integrity and seek to obtain preferential consideration. Sponsorship may be received to provide financial support (either directly or indirectly) to fund an educational visit or event which has direct benefit to patient care or to support patient care services

- declare and register any gifts (over £25 in value), benefits, hospitality and sponsorship whether accepted or declined. The arrangements in the Standards of Business Conduct Policy for recording gifts, hospitality, etc. do not apply to personal gifts of less than £25 per gift e.g. pens, boxes of chocolates, etc. However, such gifts should be declared if several small gifts worth a total of over £100 are received from the same or closely related source in a 12 month period

- not give unfair advantage to one competitor over another, if your duties involve tendering or contracting for the supply of goods and/or services to the Trust. You must also be careful that your action, or inaction, does not create an impression that you might give such an advantage
12.0 Travel Costs

In line with the Trust's Standards of Business Conduct Policy, any travel arrangements for viewing suppliers' equipment and services should be paid for by the Trust unless the Chief Executive or Executive Director gives written approval for the supplier to take responsibility for travel arrangements or travel costs.

13.0 Contact Names and Numbers (For Representative use)

<table>
<thead>
<tr>
<th>Name</th>
<th>Role</th>
<th>Contact Telephone Number</th>
<th>Email Address</th>
<th>Focus Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adam Jacklin</td>
<td>Strategic Procurement Manager</td>
<td>(01472) 302414</td>
<td><a href="mailto:adam.jacklin@nhs.net">adam.jacklin@nhs.net</a></td>
<td>High value contracts and tenders</td>
</tr>
<tr>
<td>Chris Dudley</td>
<td>Clinical Procurement Nurse Specialist</td>
<td>(01472) 874111 ext: 7824</td>
<td><a href="mailto:cdudley@nhs.net">cdudley@nhs.net</a></td>
<td>Clinical standardisation</td>
</tr>
<tr>
<td>Ivan Pannell</td>
<td>Senior Procurement Officer</td>
<td>(01472) 874111</td>
<td><a href="mailto:ivan.pannell@nhs.net">ivan.pannell@nhs.net</a></td>
<td>High value contracts and tenders</td>
</tr>
<tr>
<td>Julie Marx</td>
<td>Higher Procurement Officer</td>
<td>(01472) 875247</td>
<td><a href="mailto:julie.marx@nhs.net">julie.marx@nhs.net</a></td>
<td>Capital Procurement</td>
</tr>
<tr>
<td>Julie Newton-Ayres</td>
<td>Higher Procurement Officer</td>
<td>(01472) 875294</td>
<td><a href="mailto:julie.newton-ayres@nhs.net">julie.newton-ayres@nhs.net</a></td>
<td>Theatres Products, Clinical and Non-clinical Support</td>
</tr>
<tr>
<td>Eve Ramsay</td>
<td>Assistant Procurement Officer</td>
<td>(01472) 874111 ext: 3620</td>
<td><a href="mailto:eve.ramsay@nhs.net">eve.ramsay@nhs.net</a></td>
<td>Temporary Staffing, Community areas, Clinical and Non-clinical support</td>
</tr>
</tbody>
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14.0 Monitoring Compliance and Effectiveness

14.1 The Strategic Procurement Manager will be responsible for reviewing the policy on an annual basis to ensure it remains fit for purpose and identify where changes are required in order to comply with any new legislation and monitor its overall effectiveness.

14.2 The effectiveness of this policy can be linked to key performance indicators of the Procurement department which will assess the value of Trust spend which is via official Trust purchase orders.
15.0 Associated Documents

15.1 Standing Financial Instructions (DCM076).

15.2 Trust Devolution Policy including Reservation of Powers to the Board and Scheme of Delegation (DCM077).

15.3 Trust Constitution (DCM0001).

15.4 Local Counter Fraud, Bribery and Corruption Policy and Response Plan (DCP068).

15.5 The Medicines Code (DCP040).

15.6 Medical Device Management and Procurement Policy (DCP047).

15.7 Point of Care Testing Policy (DCP050).

15.8 Policy on the Safe Use of Medical Devices and Equipment (DCP010).

16.0 References


16.3 EC Directives on Public Purchasing for Works and Supplies Her Majesty’s Government.

16.4 The Fraud Act 2006.

16.5 The Bribery Act 2010.

16.6 The Chartered Institute of Procurement and Supply (CIPS).

17.0 Definitions

17.1 Sales representative – for the purposes of this policy a sales representative is defined as any individual representing a commercial organisation wishing to sell goods or services to the NHS.

17.2 Medical Equipment – is defined as any equipment designed to aid in the diagnosis, monitoring or treatment of medical conditions.

17.3 Consignment Stock – is stock legally owned by one party (the supplier) but held by another (the Trust), meaning the risk and rewards regarding the stock remains with the first party until used by the other party.

18.0 Consultation

None required.
19.0 Dissemination

19.1 This policy will be disseminated via the Trust’s intranet and referred to at corporate induction and also in appropriate counter fraud related Trust literature. All other opportunities for raising awareness of the policy and its objectives will be considered as and when appropriate.

19.2 The policy will also be disseminated to all current suppliers to the Trust and all future suppliers on initial engagement.

20.0 Implementation

The Strategic Procurement Manager will provide appropriate communication, advice and support to aid the successful implementation of this policy.

21.0 Equality Act (2010)

21.1 In accordance with the Equality Act (2010), the Trust will make reasonable adjustments to the workplace so that an employee with a disability, as covered under the Act, should not be at any substantial disadvantage. The Trust will endeavour to develop an environment within which individuals feel able to disclose any disability or condition which may have a long term and substantial effect on their ability to carry out their normal day to day activities.

21.2 The Trust will wherever practical make adjustments as deemed reasonable in light of an employee’s specific circumstances and the Trust’s available resources paying particular attention to the Disability Discrimination requirements and the Equality Act (2010).
Appendix A

Extract from The Medicines Code Regarding Pharmacy Supplies

2.0 Part 2 – Procurement, Ordering, Storage & Disposal of Medicines

2.1 Procurement of Medicines

All medicines for use in NLAG Foundation Trust must be purchased or acquired by an authorised member of pharmacy staff, who will ensure that the medicine is appropriate and legitimate for its intended use.

2.1.1 Purchasing for Safety

NPSA requires organisations to have policies to promote procurement for medicines with inherent safety features. This Trust is a member of the Yorkshire and Humber NHS Pharmaceuticals Purchasing Consortia and fully adopts their “Purchasing for Safety Policy” (available on the intranet).

2.2 Representatives and Drug Samples

2.2.1 Guidelines on Contacts by Representatives of the Pharmaceutical Industry:

- Representatives visiting Northern Lincolnshire & Goole NHS Foundation Trust are bound by the ABPI code of practice which prohibits inappropriate promotions, and by the Trust guidelines, which are contained within the current edition of the Trust formulary: www.pmcpa.org.uk/files/sitecontent/ABPI_Code_of_Practice_2008.pdf

- Representatives of pharmaceutical and other companies expect to promote their licensed products direct to trust staff in order to secure or increase sales. If not carefully controlled, these activities may undermine the Trust’s strategy for minimising risks associated with medicines. Medical representatives are not allowed to enter clinical areas without a definite appointment with a consultant, divisional manager or professional head of department. Requests for appointments should normally be made in the first instance by telephone. For reasons of security, representatives must wear an identification badge on Trust premises. Medical representatives may not wander around the hospital looking for staff. Medical representatives must respect their position as a guest on Trust premises and recognise that Trust interests and priorities may be different from their own. Breaches of the code must be reported to the Chief Pharmacist

- New drugs (i.e. those not on the hospital formulary) may only be purchased following compliance with local procedures. Consultant medical staff or Clinical Nurse Specialists may submit requests for new products to be made available using the ‘New Line Request’ form, available on the Trust intranet

- Reference should also be made to the Trust Policies ‘Standards of Business Conduct’ and ‘Hospitality & Sponsorship’
2.2.2 Samples of Medicines:

- Samples of medicines and dressings may represent a hazard to both staff and patients since they may not have been assessed by an appropriate body, e.g. the Medicines and Therapeutics Committee, for use in the Trust. Under these circumstances there would be no audit trail should a recall for safety reasons be necessary. It follows, therefore, that no samples (of medicines or dressings) may be left on wards or departments. Representatives of pharmaceutical companies wishing to provide samples must be referred to the pharmacy department.

- Drugs and dressing samples must not be left elsewhere on Trust premises.

- Medical and other practitioners who receive drug or dressings samples outside the hospital must not bring these samples into clinical areas.