

PE1493/O

NHS Forth Valley

Carseview House
Castle Business Park
Stirling
FK9 4SW



Telephone: 01786 463031
Fax: 01786 451474

Andrew Howlett
Assistant Clerk
Public Petitions Committee
The Scottish Parliament
Holyrood
Edinburgh
EH99 1SP

Date 31 January 2014
Enquiries to Jane Grant
Extension 210
Direct Line 01786 457210
Email jane.grant9@nhs.net

Dear Mr Howlett

NHS Forth Valley - Response to the Public Petitions Committee – PE1493 - The Sunshine Act

Thank you for the opportunity to comment in relation to Public Petition number PEO1493 titled – “A Sunshine Act for Scotland”. We have reviewed the position internally acknowledging the evidence given to the Committee in November.

In this petition it calls for Scotland to introduce a Sunshine Act, which would include an open searchable register of all payments to healthcare professionals receive via the pharmaceutical industry.

In general Forth Valley would be supportive of the introduction of such an Act, as long as the process could be streamlined within NHS Scotland.

In health we follow the statutory provisions under the Bribery Act 2010 and the requirements of NHS Circular MEL (1994)48 ‘Standards of Business Conduct for NHS Staff’ which is closely aligned to the principles within the Act.

It is worthy of note that the information provided by the Royal College of Nursing regarding the European Federation of Pharmaceutical Industries and Associations (EFPIA) highlights the intention to introduce disclosures of financial relationships beginning in 2016 for payments made in 2015. It would therefore be important that there was no overlap of recording or process in this regard, which could make it onerous for the individual rather than the NHS as an organisation. Consistency and clarity as regards introduction of the Act will be critical.

I hope these comments are useful. If you require any further information please contact my office.

Chairman: Alex Linkston CBE
Chief Executive: Jane Grant

*Forth Valley NHS Board is the common name for Forth Valley Health Board
Registered Office: Carseview House, Castle Business Park, Stirling, FK9 4SW*

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Yours sincerely

Jane Grant
Chief Executive