

PSNC - Background Papers for the Committee

Contents	Page
Code of Conduct	1
Code of Conduct – Declaration of Interests	2
Procedure for dealing with unauthorised disclosure of confidential material	3
Guidance on the Bribery Act	4
Guidance on Competition Law Compliance	6
Governance - PSNC and PSNC Committees, Panels and Groups	8
PSNC Subcommittee Remits	10
Committee Members Expenses Policy	12

Code of Conduct

PSNC is the organisation that represents the general body of NHS pharmacy contractors, and the conduct of all members acting in their capacity as such must be directed solely to the furtherance of the interests of the organisation and the contractors it serves.

- i. No person shall be eligible to be a member of PSNC unless they agree to be bound by the Code of Conduct adopted from time to time by PSNC.
- ii. A member of PSNC who, other than by reason of qualification for appointment to PSNC has a personal interest, pecuniary or otherwise, in a subject under discussion by PSNC or any of its subcommittees should ensure that interest is made known to PSNC. If the member wishes to participate in the discussion or vote on the subject, the Chair of PSNC, or of the relevant subcommittee, will decide whether the member should be permitted to take part in the discussion or, if there is one, the vote.
- iii. Members of PSNC must respect the confidentiality of all papers issued to them as members of PSNC and other information identified as confidential and acquired by them solely by virtue of their position as a member of the Committee. Should any Committee member wish to disclose items within the PSNC agenda which are not in the public domain, permission should be sought of PSNC through the Chief Executive.
- iv. Members of PSNC must ensure that the finances of the Committee are properly applied to the furtherance of the objectives of the Committee.
- v. If a member of PSNC knowingly breaches any provision of this Code of Conduct, PSNC may pass a motion of censure naming the member of PSNC accordingly.

Corporate Governance and PSNC

PSNC accepted in April 2003 the following guiding principles for members of the Committee:

Accountability - Members of PSNC are accountable for their decisions and actions to contractors and the public and therefore submit to scrutiny.

Openness - Members should be as open as possible about all the decisions and actions they take. They should give reasons for their decisions, and restrict information only for short term tactical reasons, or when the wider public interest clearly demands.

Honesty - Members have a clear duty to declare any private interest relating to their PSNC duties and take steps to resolve any conflicts arising.

Leadership - Members should promote and support the above principles by leadership and by example.

Representativeness (Selflessness) - members must reflect the interests of the contractors who elected or appointed them to PSNC and must make decisions in the interests of the general body of contractors; they must not make decisions in order to gain financial or other material benefits for themselves, family or friends.

Integrity - members must not put themselves under any obligation that might influence their performance on PSNC or their ability to reflect the interests of the contractors who elected or appointed them or to make decisions in the interests of the general body of contractors.

Objectivity - in making decisions and in carrying out the business of PSNC, members should act within the constitution and make decisions only on merit.

Note - the effect of the principles of Representativeness and Integrity is that the nominating bodies can mandate the member to express a view, but cannot bind them in how they vote or decide on a particular issue. This means the member can hear and participate in debate and is free to amend their view in the light of the debate. They will no doubt then reflect back to the relevant body why they made the decision they did, recognising their accountability.

Code of Conduct – Declaration of Interests

Code of Conduct – Declaration of Interests

Name: _____

1	Remunerated Directorship of companies (public or private) and businesses owned personally or in partnership	
2	Remunerated employment or offices	
3	Remunerated Consultancies (list all consultancies in the preceding 12 months)	
4	Remunerated work performed under contract	
5	Names of companies or other bodies in which I have an interest, either on my own account, my spouse or infant children, for a beneficial interest in shareholdings greater than the 10% of the share capital	
6	Remunerated contributions to professional and scientific publications	
7	Names of charities, not for profit and/or voluntary sector organisations in the field of health and social care or that contract for NHS services that I or my spouse have involvement with.	
8	Other sources of income or pecuniary support relevant to my membership of PSNC	
9	Membership of other pharmaceutical bodies	

In addition, please notify PSNC of any gifts and hospitality over £100 received for non-PSNC activities, which could have a perceived association with PSNC activities.

I confirm my agreement to be bound by the Code of Conduct adopted from time to time by the PSNC

Signed: _____ Date: _____

PSNC Committee members' Code of Conduct Declaration

I (Name of PSNC Committee member) declare that:

1. I have received, or have access to (for example, on the PSNC website <https://psnc.org.uk/psncs-work/about-psnc/>), of a copy of each of the following PSNC Governance documents. The PSNC:

- a) Constitution
- b) Rules
- c) Code of Conduct
- d) Code of Conduct – Declaration of Interests
- e) Procedure for dealing with unauthorised disclosures
- f) Guidance on the Bribery Act
- g) Guidance on Competition Law Compliance

2. I have read the Code of Conduct and the Procedure for dealing with unauthorised disclosures and agree:

- a) to abide by the Code; and,
- b) to maintain the confidentiality of PSNC information identified as confidential or that might reasonably be expected to be confidential.

3. Confidential PSNC information includes:

- a) confidential personal information (which may be special category or sensitive personal information), confidential financial or pharmacy market sensitive information, and information provided in confidence to PSNC from third parties including, in particular, information from the Department of Health and Social Care, NHS England and NHS improvement and NHS Business Services Authority, and pharmacy contractors, as well as,
- b) confidential discussions and decisions associated with negotiations and future changes to the Community Pharmacy Contractual Framework and/or associated community pharmacy services.

4. Unauthorised disclosure of confidential PSNC information includes such disclosure to:

- a) the body or company that has appointed me to PSNC (including, for example, senior staff members and colleagues in the organisation), and
- b) contractors who have elected me to PSNC (including, for example, senior staff members and colleagues in the organisation), and

- c) any organisation associated with my appointment or election, for example, a Local Pharmaceutical Committee or pharmacy organisation (including, for example, senior staff members and colleagues in the organisation), and
- d) my employer, or any pharmacy contractor, or other organisation with which I may be engaged or associated (including, for example, senior staff members and colleagues in the organisation).

5. I agree to be bound by the PSNC Code of Conduct and in the event that I disclose or facilitate the disclosure of confidential PSNC information when NOT authorised to do so, or fail to maintain its security such that there is an unauthorised disclosure, I agree to cooperate with any PSNC investigation (into the facts and my conduct) and, following investigation, abide by any determination of the PSNC Review and Audit Panel, or any successor body, subject to any internal appeal in accordance with PSNC procedures.

Signed **(Name of PSNC Committee member)**

Date

Procedure for dealing with unauthorised disclosure of confidential material

General Principles

These should be read in conjunction with the Code of Conduct.

1. All confidential material will be identified in agendas and papers as such. Where an agenda item is marked as confidential all papers and discussions related to the item must be treated as being confidential, even if not specifically marked as such.
2. In case of doubt the CEO or Chair should be consulted before any disclosure is made.
3. Disclosure includes disclosure to the body nominating or electing a member to PSNC. Unless otherwise agreed, material identified as confidential must be restricted to PSNC members and staff.
4. Once material identified as confidential is in the public domain, it ceases to be confidential.
5. Details of opinions expressed by individual members and how members voted on specific issues should not be disclosed by anyone other than the individual member. Members are expected to adopt corporate responsibility for the Committee's decisions.

Procedure in the event of a disclosure of confidential material

1. A member who becomes aware that confidential material has been disclosed, by him/herself or someone else, should provide information to the Chair or the CEO.
2. The Chair will decide whether the disclosure is sufficiently serious to merit reference for inquiry by the Review and Audit Panel, or whether he/she can deal with the matter informally.
3. In cases referred to the Review and Audit Panel, the Panel will conduct such investigation and inquiries as it considers are warranted. If the Panel concludes that an identified member of the Committee has been responsible for the unauthorised disclosure it may determine:
 - a) That no action should be taken in respect of the matter
 - b) To give informal advice to the member
 - c) To give a formal rebuke, reported in confidence to the Committee
 - d) To give a formal, public rebuke
 - e) To exclude the member from attendance at meetings of PSNC or its subcommittees for a specified period
 - f) To exclude the member from the Committee.
4. A member excluded by a determination under f) above will be ineligible for membership of PSNC for a period of three years from the date of the determination. When considering whether a determination under e) should be made, the Panel will have regard to the need to avoid prejudicing the interests of contractors represented by the individual.
5. Determinations made by the Panel will be communicated in writing together with the reasons for the determination.
6. A member of the Committee may appeal to the Vice Chair of PSNC against a determination or, in the event that the member is the Vice Chair, to the Chair of the LPC and Contractor Support subcommittee.

Guidance on the Bribery Act

The Bribery Act 2010 came into force on 1 July 2011 and is supported by guidance published by the Ministry of Justice. See <https://www.gov.uk/government/publications/bribery-act-2010-guidance>.

The Bribery Act 2010 modernises the Law on bribery. It is concerned with bribery which very generally is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. This could cover seeking to influence a decision-maker by giving some kind of extra benefit to that decision maker.

PSNC could be liable if a member of the Committee commits a bribery offence. We could also be liable if an employee or agent, pays a bribe specifically to get business, keep business, or gain a business advantage for PSNC.

Prosecutions are possible only with the consent of the Director of Public Prosecutions or the Director of the Serious Fraud Office. There is a defence if an organisation can show it has adequate procedures in place to prevent bribery. The procedures depend on the bribery risks and include:

1 Proportionality: The action should be proportionate to the risks faced and the size of the business. Although we are a small organisation we negotiate a significant contract.

2 Top Level commitment: It is for all members of PSNC but particularly the Chair, Chief Executive and Review and Audit Panel to commit to an anti-bribery culture. We need to show through that top level commitment that all members, and senior staff as well as people who we do business with understand that PSNC does not tolerate bribery.

3 Risk Assessment: There is additional guidance on risk assessment, and this involves considering the risks in the different markets that PSNC operates. The risks of bribery in are very small.

4 Due Diligence: This involves checking that the members of PSNC, members of staff and agents acting on behalf of PSNC are trustworthy, especially if they are going to represent PSNC during discussions in any areas where there is a risk of bribery.

5 Communication: Communicating policies and procedures to staff and to others who perform services for PSNC enhances awareness and helps to deter bribery by making clear the basis on which we do business. Awareness raising (for example through briefings such as this) is a way of setting out the PSNC position.

6 Monitoring and Review: The effectiveness of procedures may change over time.

Risk assessment

The Government assesses that organisations will face little or no risk of bribery, especially if their business is undertaken primarily in the UK. The procedures to prevent bribery should be proportionate to the relative risks – for PSNC, existing controls such as over PSNC expenditure, accounting and commercial or agent contracts for example reflect an anti-bribery culture.

It is important to ensure that ‘management’ is fully aware and committed to the objective of preventing bribery.

We need to consider doing due diligence checks on persons who will actually perform services for PSNC, or on its behalf. In low risk areas, all that may be required is to satisfy ourselves that people performing services for PSNC (for example, an agent) are genuine and someone we can trust to do PSNC’s business.

The Review and Audit Panel will keep this guidance under review and to confirm whether there are any particular risks, using the Appendix as the starting point – and if so, how to minimise these.

This briefing will also be provided to members of staff who negotiate contracts, and agents or consultants who negotiate on behalf of PSNC. Copies will also be provided to directors of PSNC Data Systems Ltd so that they can satisfy themselves about the risks they face.

Appendix - PSNC Bribery Act Risk Assessment

The following are areas where it is suggested that there are potential risks. The Review and Audit Panel will keep these under review and amend as required.

Identified areas of risk

The principle areas where a question of bribery might arise include:

- Hospitality, promotional or other business expenditure, such as dinners and agreements with any professional partners.
It is not intended that genuine hospitality or similar business expenditure that is reasonable and proportionate be caught by the Act, so PSNC can continue to provide bona fide hospitality, promotional or other business expenditure. Although key decision makers are invited to working dinners etc. and the intention is to build relationships, the cost of dinners, must be modest and proportionate. Invitations to attend must not be dependent on the invitee agreeing to act improperly in relation to contracts with PSNC.
- PSNC negotiates with bodies such as NHS England and the Department of Health and Social Care.
It is suggested that the risk of bribery is negligible.
- PSNC maintains close links with the Pharmacy All-Party Parliamentary Group. This group of parliamentarians is clearly very influential in matters relating to pharmacy.
This link is unlikely to involve bribery – but – because communications consultants are paid by PSNC to advise us and the other pharmacy bodies who provide financial support for the APPG, we should ensure that they understand that PSNC has a strong anti-bribery policy. We should also request from any communications consultants' details of their anti-bribery policies.

Guidance on Competition Law Compliance

Guidelines for Meetings

The PSNC, being a representative body for pharmacists in the UK, brings together a number of parties, many of whom are competitors. This can give rise to competition law concerns should any commercially sensitive information be disclosed or discussed at any meeting. A short guide to Competition Law Risk is at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/587464/cma-risk-guide-2016-revised.pdf

To avoid any competition law concerns, all participants at any PSNC meeting (whether it be a formal committee or subcommittee meeting or more informal occasion) should take care in any discussions with other participants who are or who may become competitors. The guidelines below provide a framework for such discussions and, where appropriate (for instance the use of an agenda or minutes would not be appropriate during an informal social gathering), should be adhered to at all times.

1. Objectives of the meeting

- 1.1 A clearly listed agenda should be prepared before the meeting identifying the topics for discussion - the agenda should be used to provide the framework for the discussion and the meeting should not stray beyond those items listed to be discussed.
- 1.2 Topics for discussion should be limited to the activities and responsibilities of the PSNC, as well as general industry matters. Examples of PSNC activities and responsibilities and general industry matters would include:
 - 1.2.1 The detailed functions and roles of the PSNC including (but not limited to):
 - (a) liaising with the Department of Health and Social Care and National Health Service bodies on behalf of chemists;
 - (b) the negotiation, as representative of the general body of chemists, with the Department of Health and Social Care and NHS bodies on the conditions of service and remuneration for the dispensing of prescriptions and provision of other services;
 - (c) agreeing with the Department of Health and Social Care the prices to be used in the prescription processing division for NHS prescriptions or other pharmaceutical services;
 - (d) the provision of administration, audit and advisory services relating to chemists on NHS matters.
 - 1.2.2 Current or proposed legislation or regulation - for example:
 - (a) defects in existing legislation/regulation and difficulties faced by the sector in complying with such legislation/regulation;
 - (b) status of legislative/regulatory proposals;
 - (c) industry-wide responses to consultations;
 - (d) impact of current or proposed legislation/regulation (without disclosing any commercial information relevant to a member);
 - (e) Industry-wide initiatives to comply with legislation/regulation;
 - 1.2.3 General developments or trends in the sector;
 - 1.2.4 Collection or review of industry data (but any data that contains commercially sensitive information should be historic, generalised and made anonymous prior to being disclosed to other members);

- 1.2.5 Educational or training events for members;
- 1.2.6 Current or proposed guidelines/rules/codes prepared by the PSNC:
 - (a) scope of guidelines/rules/codes;
 - (b) amendments to current guidelines/rules/codes;
- 1.2.7 Compliance with such guidelines/rules/codes.

2. Conducting the meeting

- 2.1 Generally, minutes should be made recording all discussions during the meeting;
- 2.2 If a member wishes to clarify (for competition law compliance purposes) whether he/she can or cannot discuss a particular topic, or if any member has any doubts about an issue it would like to raise for discussion, this should be raised with the Chair of the meeting outside of the meeting prior to the issue being raised.
- 2.3 If any of the issues listed in 3.1 below are raised, the discussion should be terminated immediately.

3. Discussions during the meeting

- 3.1 Where members (at the meeting) include actual or potential competitors, they should not discuss their own or their competitors' commercial strategy or any matter which would be considered commercially sensitive. Subjects to avoid are:
 - 3.1.1 Individual commercial policies of those companies present - this includes historical, current or future policy where it is not in the public domain and participants should not question other participants about such policy;
 - 3.1.2 Any commercial difficulties faced by the participants other than in very general terms - for example, members may express their general concern at rising costs or overheads but should not disclose the impact of those costs on their profit margins or other financial figures;
 - 3.1.3 Any proposal discussing any coordinated commercial conduct between participants (for instance relating to pricing, distribution or arrangements with customers);
 - 3.1.4 Any request made by one participant (or discussion) asking other members to stop any particular commercial conduct or relationships;
 - 3.1.5 The sharing of commercially sensitive information (verbally and in writing) – including (but is not limited to);
 - (a) Pricing terms;
 - (b) Current terms and conditions of supply trade;
 - (c) Details of the commercial arrangements with customers or suppliers;
 - (d) Sales information;
 - 3.1.6 Making any allegation as to the commercial conduct of others.
- 3.2 To the extent that any information is shared between participants, such information should be general, non-specific and where appropriate, should be historical and made anonymous to ensure that the information is not commercially sensitive and cannot be attributed to any participants.

4. Outcomes of the meeting

- 4.1 Minutes of the meeting should be prepared and circulated to attendees. Note that any decision or recommendation made at a PSNC meeting, however informal, can be subject to competition law and could constitute a potentially anti-competitive agreement.

Governance - PSNC and PSNC Committees, Panels and Groups

PSNC

PSNC, which is representative of NHS community pharmacies in England, has a membership of:

- A Chair appointed by PSNC in accordance with the Rules who may be, but need not be, a registered pharmacist.
- THIRTEEN Independent Chemists elected as regional representatives in accordance with the Rules.
- ONE Chemist appointed by Community Pharmacy Wales to be the representative of contractors in Wales.
- TWO Independent Chemists appointed by the Board of Management of the National Pharmacy Association.
- TWELVE registered pharmacists appointed by the Company Chemists' Association.
- THREE Multiple Chemists elected as multiple chemist representatives in accordance with the Rules.

The membership of PSNC is set out in its Constitution.

Subcommittees

PSNC has a number of subcommittees, panels, working groups and teams. This paper sets out briefly the eligibility for membership, their powers and remits. Full details are included in the PSNC Rules.

Where the subcommittee, panel or group includes reference to a number of independent and a number of multiple members, the members are elected or appointed during a meeting held by each sector. This meeting takes place as soon as practicable after the election of the subcommittee chairs, (i.e. biennially in May) when it is known who the subcommittee chairs are, having been elected by the full Committee.

I = Independent member of PSNC; M= Multiple member of PSNC

Funding and Contract subcommittee (FunCon) – 5xI + 5xM, including chair elected by PSNC.

The functions of the Funding and Contract sub-committee Service shall include monitoring the implementation of the funding elements of the Community Pharmacy Contractual Framework and explore the financial impact of new initiatives and funding models.

Service Development subcommittee (SDS) – 3xI + 3xM including chair elected by PSNC.

The functions of the Service Development sub-committee shall include monitoring of services, development of proposals for new services, and Information Technology.

LPC and Contractor Support subcommittee (LCS) – 4xI + 4xM including chair elected by PSNC.

The functions of the LPC and Contractor Support sub-committee shall include providing services and support for Local Pharmaceutical Committees and Chemists

Resource Development and Finance subcommittee (RDF) – 5 subcommittee chairs + PSNC Chair + PSNC Vice-chair + optional PSNC co-opted members if necessary to ensure balance of sectors.

Legislation and Regulatory Affairs subcommittee (LRA) – 5 including chair elected by PSNC.

Remit: The functions of the Legislation and Regulatory Affairs sub-committee shall include considering legal and NHS policy issues and developments relevant to NHS pharmacy services.

Communications and Public Affairs subcommittee (CPA) – 4xI + 4xM, to comprise two representatives from each of FunCon, SDS, LCS and LRA and including chair elected by PSNC.

Remit: The functions of the Communications and Public Affairs sub-committee shall include considering strategy and support for communications with internal and external stakeholders and public affairs issues relevant to NHS pharmacy services.

Other Main Groups

Negotiating Team (NT) – Membership: chairs of FunCon and SDS, + 4 other members of PSNC to achieve 3xI + 3xM representation, together with PSNC’s CEO and Directors of Pharmacy Funding, NHS Services, Operations and Support, and Communications and Public Affairs.

Members of the Negotiating Team must have the skills and qualities needed for the roles, which include:

- enjoying the confidence of their peers;
- a good understanding of the current contractual framework and funding;
- commitment to implementation of PSNC’s policies for the future development of the community pharmacy service;
- commitment to protect the confidentiality of negotiations as required;
- the ability to work well in a team;
- sensitivity to the demands on others;
- willingness to devote time, which at some periods can be intensive and demanding, and
- commitment to abiding by collective decisions.

The role of the NT is to represent the views and interests of members of the Committee and the contractors whose interests PSNC serves, in agreeing the detail of negotiations with NHS England and the Department of Health and Social Care. In view of these responsibilities it is essential that the Committee has confidence in the NT. Although the NT comprises three representatives of each of the two sectors, independents and multiples, it works as a single team with the CEO and Directors of Finance, Operations and Support, NHS Services and Communications and Public Affairs; and all members are expected to ensure the positions reflected by the NT are acceptable to the majority of contractors.

Review and Audit Panel – 5 PSNC elected members who are not the PSNC Vice chair or a subcommittee chair + optional one Panel co-opted member if necessary to ensure at least one person from each sector.

Remit: The purpose of the Review and Audit Panel shall be to review the work of PSNC and its operational structures at specific intervals; to assure efficient pursuit of PSNC’s strategic and internal objectives; to ensure resource management is effective; to encourage improving quality and performance at all levels; to manage the performance of any co-opted members of PSNC, and to assure corporate governance.

Appointments Panel - 6 subcommittee chairs + 2 PSNC elected members.

Remit: The purpose of the Appointments Panel is to propose to the PSNC a candidate for appointment as Chair of the PSNC.

Other Groups and Working Parties

PSNC has many other smaller groups and working parties that may be formed either from committee members or with wider cross-sector membership for a variety of purposes, for example the Community Pharmacy GDPR Working Party.

(The names of the LPC and Contractor Support subcommittee and the Legislation and Regulatory Affairs Committee were agreed by the PSNC in May 2018 and was changed in the Rules in October 2018.)

PSNC Subcommittee Remits

PSNC's subcommittees have responsibility for advising on relevant policy issues and monitoring the performance of specific elements of the Committee's work. Most aspects of PSNC's work are allocated to a subcommittee, which will make recommendations to the main Committee. The subcommittees have limited authority to agree expenditure for activity to fulfil the Committee's annual plan.

Remit of the Funding & Contract subcommittee

1. Monitor the implementation of the funding elements of the Community Pharmacy Contractual Framework (CPCF);
2. Ensure contractor guidance on funding is robust and timely;
3. Ensure agreed funding is delivered for the CPCF;
4. Ensure changes in remuneration and reimbursement do not disadvantage contractors;
5. Ensure PSNC has reliable drug pricing information;
6. Keep the Cost of Service Inquiry and other evidential bases of CPCF funding under review;
7. Ensure practicality of financial aspects of CPCF services;
8. Evaluate the potential financial impact of initiatives generated by the Service Development subcommittee on national and local contracts;
9. Ensure that fair funding fully reflects all cost elements and risks;
10. Develop new models for remuneration and reimbursement and evaluate the use of alternative valuation models; and
11. Ensure all aspects of the CPCF and LPS contracts support contractor interests.

Remit of the LPC and Contractor Support subcommittee

1. Ensure PSNC provides appropriate support for contractors and LPCs;
2. Oversee PSNC's communications to contractors and LPCs, including media work;
3. Monitor LPC and contractor satisfaction with PSNC's services;
4. Develop programmes for providing training, conferences and other support services;
5. Support collaborative working with other bodies; and
6. Oversee local and national public affairs work, providing support for contractors and LPCs.

Remit of the Resource Development and Finance subcommittee

1. Consider and propose annual budgets and processes;
2. Ensure the provision of effective management information and monitor monthly performance;
3. Ensure effective control of PSNC finances;
4. Review policies for major areas of expenditure;
5. Establish and develop the human, financial, physical and systems resources to support the strategy and achieve the objectives of PSNC;
6. Develop an internal training and team-building programme for PSNC members and staff;
7. Develop income generation activity, to reduce dependence on levy income;
8. Ensure office space is adequate for staff; and
9. Understand and suggest development for PSNC's internal systems.

Remit of the Service Development subcommittee

1. Keep Community Pharmacy Contractual Framework (CPCF) services under review and identify opportunities for services to change categories (e.g. to become Essential services);
2. Monitor uptake of non-Essential services;
3. Identify and prioritise opportunities for new community pharmacy services commissioned nationally or locally;
4. Develop or oversee the development of service specifications and other materials to facilitate the commissioning of services; and
5. Ensure community pharmacy IT supports service development.

Remit of the Legislation and Regulatory Affairs subcommittee

1. Monitor and advise on the legal and regulatory environment relevant to community pharmacy, seeking changes as appropriate;
2. Consider rural policy relevant to community pharmacy;
3. Monitor and advise on data protection issues;
4. Monitor and advise on the Pharmaceutical Services Regulations and Terms of Service, considering proposed changes and influencing future proposals;
5. Monitor and advise on other legal requirements affecting the provision of community pharmacy services; and
6. Advise on regulatory issues associated with commissioning and contracting.

Remit of the Communications and Public Affairs subcommittee

1. Ensure that PSNC's policy position statements are appropriate and seek to influence NHS policy on community pharmacy in line with these;
2. Ensure that PSNC's public affairs strategy builds support for community pharmacy and PSNC policy across Parliament, local Government and wider stakeholders;
3. Ensure that PSNC's communications strategy for contractors and LPCs provides them with appropriate information via the best channels and promotes PSNC and its policies;
4. Provide support for the contractor body and LPCs on communications and public affairs matters;
5. Monitor and work to enhance PSNC's reputation, including consideration of risks and media work;
6. Support collaborative communications work with the other national pharmacy organisations.

PSNC Committee Members' Expenses Policy

From April 2020

1. Introduction

- a. PSNC agrees to reimburse the company of Committee Members, for reasonable expenses incurred wholly, exclusively and necessarily in conducting PSNC's business.
- b. This document sets out the conditions under which claims will be paid and the process to be followed.
- c. **Committee Members are encouraged to minimise spend wherever possible.**
- d. The Resource Development and Finance subcommittee may review expenses claims by individual Committee Members.

2. Chargeable occasions

- a. This policy is designed to ensure that Committee Members are not penalised financially for activities undertaken on behalf of PSNC.
- b. The underlying principle is that expenses are payable for occasions where Committee Members are working on behalf of PSNC and have been requested to do so by the Committee or Office.
- c. Claims are payable for the following events (real or virtual):
 - i. PSNC and subcommittee meetings
 - ii. Negotiating Team meetings
 - iii. RAP and Appointments Panel meetings
 - iv. Other PSNC driven ad hoc meetings
 - v. LPC Conference
 - vi. Regional LPC meetings, whether organised by PSNC or established regional groups
 - vii. Visits made by Regional Representatives to LPCs other than their own
- d. Claims for other meetings must be authorised in advance by the CEO.

3. Expenses covered

- a. Accommodation expenses for the night before an event will be paid only if travel on the day is impossible or unreasonable.
- b. Rail fares will be reimbursed at first class advance booking rates, with open fares being covered only in exceptional circumstances.
- c. Congestion charge is payable.
- d. Flights will be paid if the cost is comparable to rail fares.
- e. Virtual meetings will be dealt with as follows:
 - i. Weekly Negotiating Team telecons - 50% of day rate payable if backfill incurred
 - ii. PSNC evening update telecons - 25% of day rate payable, at individual discretion if backfill costs incurred
 - iii. PSNC meeting telecons - 50% - 100% of day rate payable per day depending on format

4. Claims process

- a. Expenses should be submitted using a company invoice with no VAT added. The invoice should state that the supply to which it relates falls outside the scope of VAT and contain the dates and nature of meetings attended. A template is available.
- b. Invoices should be submitted electronically to salha.mansour@psnc.org.uk or by post to her at Hosier Lane.
- c. Copy receipts are required for all travel claims over £10. These can be scanned and submitted electronically. **Original receipts should be retained for claimant's company's tax records** but PSNC reserves the right to inspect them.

- d. All invoices are approved by the CEO / a Director prior to payment by the Finance Manager.
- e. Claims must be submitted regularly and preferably within 3 months. PSNC policy is that expenses not claimed within three months of the financial year end will not be reimbursed.

5. Rates

- a. Current rates are set at:
 - i. Daily allowance = £250 (£125 for half day).
 - ii. Overnight expenses will be reimbursed based on receipts. Payment will be capped at £180 per night for accommodation and meals (£210 per night for London). Alcohol expenses will not be reimbursed and the maximum sum that will be allowed for an evening meal will be £30.
 - iii. Mileage rate = 45ppm (HMRC approved mileage rate).
 - iv. Travel will be reimbursed subject to the criteria in section 3.
- b. The daily allowance is reviewed annually by RDF in light of prevailing locum rates. The maximum limit for overnight accommodation is based on the cost of a business hotel and reasonable meal (in London) and may be reviewed more regularly. The mileage rate is determined by HMRC.

6. Payment process

- a. PSNC will make payment directly into the claimant's company's bank account.
- b. A list of bank account details is maintained by the Finance Manager.
- c. The Finance Manager will confirm these details at least once a year with members.
- d. In exceptional circumstances a cheque may be issued to the claimant's company.