



Dr Peter J. Gordon

Tuesday, 2nd June 2015

To: **Sigrid Robinson**
Assistant Clerk
Public Petitions Committee
The Scottish Parliament

Dear Ms Robinson

Scottish Parliament Public Petition PE1493 on a Sunshine Act for Scotland

Thank you for informing me that my petition is to be further considered by the Public Petitions Committee at its meeting on Tuesday 9th June 2015.

You suggested that I might like to make a written submission for the meeting of the Committee informing me that this would be published online with the other evidence that the Committee have gathered for **Petition PE1493**.

The Scottish Government in a letter to me as petitioner stated:

"In moving forward, Scottish Government would wish to seek wider views from the people of Scotland, particularly patients and their families, on what they think a robust, transparent and proportionate response to this issue should look like in 2015 and beyond. We feel it is important to do this in the context of the existing legislation, the role of professional and regulatory bodies and the significant progress towards voluntary registers by the pharmaceutical industry."

Scottish Government letter to the Petitioner, ref 2014/36604, 2nd February 2015

I would like to draw the Committee's attention to four points that would seem to be central to this statement by the Scottish Government:

Point ONE:

The Scottish Government have approached the **Scottish Health Council** (letter dated 30th April 2015) to help seek the wider views from the people of Scotland. As I had not heard from the Scottish Health Council I wrote to Richard Norris, the Director. I have since offered dates to meet with them but have had no further response.

Pont TWO:

The Scottish Government advocate a system of transparency that is "*in the context of professional and regulatory bodies*". I can refer the committee to the regulatory body of which I am a member: the **Royal College of Psychiatrists**. My communications with the College and directly with the President, Sir Prof Simon Wessely identified that the College Guidance on transparency was not being followed (**CR148**). This Royal College guidance has been in place for more than a decade. We cannot therefore rely on this approach to deal

with this issue, and I have no reason to believe the situation to be any different for the other Royal Colleges.

Point THREE:

The Scottish Government reassure us on the *“significant progress towards voluntary registers by the pharmaceutical industry.”* The key word here is **voluntary**. Experience across the world has shown that those who have received payments from the pharmaceutical industry generally choose not to declare it on a voluntary register. The **opt-out** on the **ABPI code** is a real concern in terms of public transparency.

Point FOUR:

One member of the Petitions Committee expressed concerns about a statutory, independently administered, single, searchable register as having the potential to be a *“bureaucratic nightmare”*. I very much understand this concern. However it is clear to me that we already have multiple, overlapping, inconsistent and unsearchable approaches to declaring financial interest.

For example as a doctor I should be declaring any financial interests to my **NHS employer** (HDL62); to my **College** (CR148); to the **British Association of Psychopharmacology**; to **Conferences Organisers** (we have multiple professional Conference organisers); to the **ABPI Central Platform**; to the **BMJ** or the **Lancet** or any scientific journal.

I would argue strongly that the inefficient requirement of overlapping layers of expensive governance, as we have just now, is the actual *“bureaucratic nightmare”*. Why not have instead one register where all can return to? This would be more efficient, lean, and ensure public transparency at the least cost.

I remain of the view that Scotland could lead the way here. I hope this update is of some assistance to the Committee ahead of the 9th June 2015.

Yours sincerely,

Full details of all evidence I have collected for this petition, including my writings, publications and films, can be accessed from this one page: <http://wp.me/P3fTIB-1zA>