

Competition Law Compliance

Guidelines for meetings

Policy number POL-005

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Greater Manchester LPC, known as Community Pharmacy Greater Manchester (CPGM), is the representative body for pharmacy contractors. CPGM brings together several parties, many of whom are competitors, which could give rise to concerns about competition law.

To avoid any potential issues, all participants in the meeting, whether this be a full committee meeting, sub-committee meeting or an informal meeting, should be mindful of Competition Law and take care in any discussions with current or future competitors.

The framework below is designed to support effective and risk-free conversations. You will find specific guidance in this policy on recognising and addressing competition law.

The policy applies to all committee members, employees, consultants, officers and anybody representing CPGM. It is not part of your employment contract and can be amended anytime.

This policy is not meant to offer legal advice to any individual or company but has been drawn up in good faith based on providing general and high-level guidance. If you require more detailed advice, you should contact your line manager. Individuals employed by member companies may find that their employer has its own competition law compliance policies. This policy is not meant to override or detract from such policies.

Our Commitment and your obligation

We are committed to absolute integrity and fairness and will not tolerate any activities involving breach of competition laws.

If you are employed or representing CPGM or in any other way under our control, you are obliged to take responsibility for preventing, detecting, and reporting anything you believe amounts to, or could amount to, a breach of competition laws.

You must report in writing any conduct or activity that you suspect amounts to a breach of competition laws to your manager, Chair or Vice Chair. Please consult our policy on whistleblowing for further information about raising concerns.

CPGM will never penalise anyone who refuses to become involved in breaching competition laws or flags their concerns in good faith.

Meeting Objectives

- A clear agenda should be circulated before the meeting, highlighting the topics for discussion.
- The meeting should stick to the topics identified for discussion and the Chair should intervene if this is not the case.
- If a discussion is thought to have strayed into a sensitive area of competition law. In that case, the concern should be raised with the Chair and the discussion should be immediately suspended from any further discussions or actions, so that appropriate /legal advice can be obtained. The Chair will update the committee at the next opportunity.
- If you have concerns about a breach of competition laws and the discussion is not closed, you may excuse yourself from the meeting without fear of recourse. Any potential breach of competition law must immediately be reported to the Chair or Vice Chair.
- Discussion should be limited to the activities and responsibilities of CPGM and general industry matters, which could include:
 - Liaison with NHSE and other bodies
 - Negotiating fees and services for the provision of enhanced services
 - Responding to control of entry applications
 - The provision of advice to contractors on local NHS matters
 - Responses to national and local consultations
 - Impact of proposed regulatory change

- Review of NHS data which may or may not have been anonymised
- Educational or training events for contractors

During the meeting

- Minutes will record the key points made during the discussion.
- If a committee member is unsure whether to raise a specific point, they should discuss this with the Chair prior to the meeting.
- Committee members **may discuss** information in the public domain, such as policy developments, proposed legislation, market trends, technical information, etc.
- Committee members should **not discuss**
 - their own or their competitors' commercial strategy
 - any matter (not in the public domain) which could be considered commercially sensitive, including sales information, pricing strategy, distribution arrangements, terms and conditions,
 - any co-ordinated commercial conduct
 - any allegation about the commercial conduct of other
- Commercial challenges that express concern may be discussed in general terms but **must not** include the impact on profit margins or other financial figures.

After the meeting

Decisions or recommendations made at LPC meetings can be subject to competition law therefore minutes should be reviewed prior to circulation.

Version control

Version and date	Author	Changes made
1: March 2024	Janice Perkins	Governance Subgroup
2: March 2025		