



LIFE SCIENCES GROUP

# Code compliance

Comparing the IPHA code  
and ABPI code

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## Code compliance: comparing the IPHA Code and ABPI Code

KEY DIFFERENCE		IPHA CODE REFERENCE	ABPI CODE REFERENCE
SCOPE OF APPLICATION	<ul style="list-style-type: none"> <li>- IPHA Code applies to activities of member companies; ABPI Code applies to member companies and affiliates of member companies.</li> <li>- IPHA Code of Practice for Pharma Industry applies to promotion of POMs only. Separate Code for OTCs – Self-Care Advertising Code. ABPI Code applies to promotion of POMs and also OTCs where the advertisement is designed to encourage doctors to prescribe the OTCs (but not where the object of the advertisement is to encourage their purchase by members of the public).</li> </ul>	<ul style="list-style-type: none"> <li>- Clause 1</li> <li>- Clause 1.1</li> </ul>	<ul style="list-style-type: none"> <li>- Clause 1.2</li> <li>- Clause 1.1. Supplementary Information</li> </ul>
USE OF COMPETITOR'S NAMES	Competitor brand names are not permitted to be used by IPHA member companies unless prior consent of the companies concerned has been obtained. The ABPI Code does not preclude the use of other companies' brand names when making comparisons.	Clause 5.6	Clause 14.1
ADVERSE EVENTS/ ADDITIONAL MONITORING	<ul style="list-style-type: none"> <li>- ABPI Code requires that all promotional material include the prominent statement "Adverse events should be reported". No equivalent in IPHA Code, however, this is covered in HPRA's guide to advertising compliance.</li> <li>- The IPHA Code provides that company procedures should be in place to ensure that digital platforms are monitored for adverse events on a regular basis and in line with regulatory requirements. There is no equivalent provision in the ABPI Code.</li> </ul>	<ul style="list-style-type: none"> <li>- N/A</li> <li>- Annex IV Guideline on Digital Communications in the Pharmaceutical Sector</li> </ul>	<ul style="list-style-type: none"> <li>- Clause 12.6</li> <li>- N/A</li> </ul>
ABBREVIATED ADS	The ABPI Code includes specific guidelines on abbreviated ads. The IPHA Code does not include any equivalent provision. IPHA's statement on banner advertisements which is a separate guidance document broadly aligns with the ABPI Code provisions but is not as detailed.	N/A	Clause 13

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ARTWORK REFERENCES	The ABPI Code requires that references must be provided for all artwork used. There is no equivalent provision in the IPHA Code but there is a general obligation to ensure all information is capable of substantiation.	Clause 4.4	Clause 6.3
REQUEST FOR SUBSTANTIATION	The ABPI Code prescribes a 10-day limit whereas there is no limit provided for under the IPHA Code, which instead requires substantiation "without delay".	Clause 4.5	Clause 14.3
CERTIFICATION AND RECERTIFICATION	There is a far more rigorous certification process of promotional material under the ABPI Code, in comparison to the IPHA code. The ABPI Code also requires that material which is still in use must be recertified at intervals of no more than two years to ensure that it continues to conform with applicable regulatory requirements. The IPHA Code does not include a recertification obligation.	Clause 22	Clause 8
PROACTIVE DISTRIBUTION OF JOURNAL REPRINTS	The ABPI Code requires peer review. This is not required under the IPHA Code.	Clause 11	Clause 16.5
QR CODE	The ABPI Code permits prescribing information in promotional material to be provided by way of QR code. The IPHA Code permits the use of a QR code on printed promotional materials but same cannot be a substitute for the information required to be provided by text, it can be used as a supplementary tool only.	Updated clause 7.2 in most recent version of IPHA Code which will be formally published in June 2025.	Clause 12.1
HOSPITALITY	The ABPI Code is more prescriptive in some instances, for example, providing that the total costs of items provided to an event attendee must not exceed £6 excluding VAT (Clause 10.5) whereas the IPHA Code provides that companies may provide pens and paper during company-organised meetings provided they are 'inexpensive' i.e. no set price. In addition, the IPHA Code only provides a monetary limit for meals which is set at €80 euro (incl. VAT but excluding gratuity). There is a corresponding £75 limit in the ABPI Code but this is expressed as being at the upper limit.	Clause 16	Clause 10
JOINT WORKING	The ABPI Code includes joint working between the health service and industry as a form of collaborative working with organisations. The IPHA Code does not have an equivalent concept.	N/A	Clause 20

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PMCPA AUDITS	The Code of Practice Appeal Board or the ABPI Board may require an audit of a company's procedures in relation to the ABPI Code to be carried out by the PMCPA. The IPHA Code permits the Code Council or Appeals Board to request further information from a member company which arguably could include SOPs, however, the IPHA Code does not expressly permit SOP audits when considering a complaint / referral.	Annex I Administration of the Code and Complaints Procedure	Constitution and Procedure - Guidelines on company procedures relating to the ABPI code of practice for the pharmaceutical industry
PUBLICATION OF CASES	The ABPI Code requires that all case reports be published on its website. The IPHA Code does not require publication of its case findings on its website but instead requires same to be published annually and circulated to various stakeholders.	Clause 11	Clause 15