

Customer survey 2014 action plan

Overall, the results of the 2014 customer survey were extremely positive, with improvement on the high levels of satisfaction seen in 2011. The VMD would like to thank everyone who contributed to the survey: 116 people completed it, a total which provided a good spectrum of our industry stakeholders and a good base for analysis. Respondents represented independent consultants (16%), employees of marketing authorisation holders (67%), manufacturing authorisation holders (33%) and wholesaler dealer authorisation holders (28%) in broadly similar proportions to 2011

The survey was conducted in three phases: a preliminary phase involving a small number of customers to identify any current concerns, a web-based survey phase (the quantitative phase) followed by one-to-one telephone interviews to explore in-depth with those customers who were not fully satisfied on a number of services and indicated their willingness to take part in this final phase.

This action plan has been split into the thematic areas where the suggestions for improvement were made and each action has been given a high, medium or low priority. Where we consider that no further action is needed, we have explained why.

Key findings where the VMD has made or intends to make improvements include the following:

- **Joint labelling:** the team has been working with the Irish authorities to improve clarity of the process. We have published a clarification paper on our website and have completed a review of our internal guidance documents.
- **Product literature standard (PLS):** we are revising the PLS with the aim of simplifying it and making it easier to navigate. We have updated internal guidance documents and given refresher training to all assessors who evaluate mock-ups.
- **Pharmacovigilance:** we have added a system for tracking reports to the team's bespoke software system. We have amended reporting forms to improve the quality of data received and have revised the process for nullifying duplicate reports.
- **Enforcement:** although there are limits on how much we can share in terms of progress updates in order to maintain confidentiality, we will increase the scope of the data we share publicly (e.g. number of reports received) in an ongoing plan to improve communications.
- **Communications:** we will explore how we can improve the speed of response to queries and make it easier to identify the correct person to contact with the aim of sharing best practice across the VMD; we will take this forward as part of an existing communications project looking at the way the VMD handles queries.

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<p>Joint labelling:</p> <p>Only timescale of the process was scored good or excellent by over 70% of respondents (74%), while clarity of the process and overall satisfaction for the process received lower scores (69% and 53%, respectively) and satisfaction for these two had decreased by several percentage points since the 2011 survey.</p> <p>This area was identified for qualitative follow-up. Open questions were asked, in part to establish whether concerns reflected the specific joint labelling procedure or assessment of mock-ups more generally. Qualitative feedback for follow-up is captured below in italics. (Feedback from joint labelling questions which related instead to the product literature standard are logged in that section)</p>		
<p>a) Overall level of service b) Clarity of process</p> <p>c) <i>Request for clearer communication on whether UK or IE are leading, who the assessors are, and timelines (e.g. as email following receipt of mock-ups).</i></p> <p>d) <i>Simplification of requests for changes, perhaps with annotated scanned text</i></p>	<p>a), b) Qualitative follow-up on overall level of service and clarity of the process are captured in points c) to h) below.</p> <p>c) Following discussions with IE in development of the revised clarification paper, the lead country will email the applicant with the timeline for assessment. The UK general assessment team (GAT) assessor allocated to the application is identified in the 'validation passed' email. No further action considered necessary.</p> <p>d) Mock-ups annotated with assessor comments used to be sent in the past, but on switching from paper to electronic communication we found that most companies considered this step unnecessary. There are no current plans to resume this practice.</p>	<p>A revised clarification paper on the joint labelling process has been drafted, agreed with IE and published on our website. A related article is being drafted for publication in MAVIS to highlight the areas revised.</p> <p>Completed</p> <p>No further action considered necessary</p>

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e) <i>Wish to have approval subject to minor amendments (but not a universal view)</i>	e) The VMD does not make a practice of doing this, since it would mean we held a non-final copy on our files; this would make it harder to maintain consistency of assessment of future applications. We note that some respondents do not support sign-off subject to minor amendments. No change is considered necessary.	No further action considered necessary
f) <i>Information in covering emails not passed to General Assessment Team (GAT)</i>	f) This comment has been taken on board, and the administration and assessment teams' internal guidance documents and checklist have been updated to ensure that information in covering emails is taken into account when assessing the mock-ups. No further action considered necessary.	Completed
g) <i>Perceived lack of streamlining between VMD and IMB on i) submitting questions, and ii) timelines (VMD 20 days, IMB 30 days). A constructive proposal suggesting a consolidated question list which avoided duplication was put forward, identifying the authority making the request.</i>	g) The VMD's 20 day timescale was introduced as an improvement measure after the previous customer survey to increase the efficiency of the process. We appreciate in the joint labelling procedure this doesn't align with the Irish timeline and we will accept submissions up to 30d for these procedures – this has been addressed in the revised clarification paper. Regarding duplication of questions and identification of the authority asking them, following recent discussions with IE, questions will be consolidated to avoid duplication. This removes the need for identification of the authority since both agree all the questions.	Completed
h) <i>Requests for changes after initial assessment</i>	h) See section on product literature standard.	

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<p>Product literature standard (PLS):</p> <p>This was a new section in the 2014 survey. 70% of respondents gave a score of good or excellent for the overall usefulness and ease of navigation of the PLS. Clarity of the guidance scored highest (79%) while the extent to which it is applied a) consistently and b) pragmatically by assessors scored just below the 70% line (68% and 67%, respectively). This area was identified for qualitative follow-up. Open questions were asked as the PLS section was new for the 2014 survey, and questions were relatively broad in scope. Qualitative feedback for follow-up is captured below in italics.</p>		
<p>a) <i>Comments on the PLS mainly related to the VMD being “pedantic” or “gold plating”. The PLS was considered to be for guidance only and is enforced more than it should be.</i></p> <p>b) <i>Respondents referred to minimum font size specifications on the PLS and were of the view that this made it very difficult or even impossible to include all their required text. Font size is not believed to be part of legislation. Respondents believed if the text was readable, this should be sufficient, regardless of font sized used. This could require adding space, reducing text and having statements on one line only.</i></p>	<p>a) The PLS is guidance, not law, but it sets out the VMD and the HPRA (formerly IMB) interpretation of the legislation. The PLS is currently under revision to restructure, simplify and make it easier to navigate with the intention of making it more user friendly. Assessors consider requests to deviate from the guidance on a case by case basis. The PLS aims to provide consistency in assessment of mock ups.</p> <p>b) The legal minimum requirements for information to be included on the immediate and outer packaging comprise relatively modest amounts of text due in part to the EU need for multilingual labelling. Legibility is also a legal requirement. There is no restriction in amount of text in the package leaflet. Therefore, attention should be given to the amount of text included in the product literature during the scientific assessment period.</p> <p>The VMD tries to be as pragmatic as possible in this area but poorly legible text can pose a safety risk. No further change considered necessary.</p>	<p>Revision of the PLS nearing the final stages; it will be sent for review by the ‘Better Regulation Executive’ and the HPRA over the summer. Consultation of the document will follow in due course.</p> <p>N/A</p>

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<p>c) <i>Respondents felt that sometimes there were good reasons to deviate from the Quality Review of Documents (QRD) template, e.g. making text more reader friendly for end users,</i></p>	<p>c) The value of rewording QRD text to make it more user friendly is accepted for certain products (most commonly non-prescription products) but these revisions should be made during the main assessment phase of the application, not at the assessment of mock-ups stage. No change considered necessary.</p>	<p>N/A</p>
<p>d) <i>Assessor inconsistency in following the PLS, sometimes requesting changes not consistent with the guidance.</i></p>	<p>d) The point is acknowledged; inconsistencies may have resulted in part from the current situation where GAT assess most mock-ups, but pharmaceuticals and biologicals assessors assess those for national variations and renewals. The training period for new staff might also contribute from time to time.</p> <p>The revision of the PLS is intended to help assessor consistency through simplification and increased ease of navigation of the document. Refresher training of assessors has also been undertaken, as well as a review of the relevant internal guidance documents to ensure all know where to find them.</p>	<p>Revision of the PLS nearing the final stages; it will be sent for review by the 'Better Regulation Executive' and the HPRA over the summer. Consultation of the document will follow in due course. Other actions completed</p>
<p>e) <i>Lack of pragmatism when interpreting QRD/PLS guidance: a view which arose in different comments related to the application of guidance as if it was legislation, e.g. insistence on inclusion of QRD headings on packaging; perception that EMA guidelines require less text than the PLS.</i></p>	<p>e) General comments re lack of pragmatism are addressed above, but with respect to the comparison with EMA guidelines liaison with EMA colleagues will feed in to review of this area of the PLS while it is under revision.</p>	<p>Revision of the PLS nearing the final stages; it will be sent for review by the 'Better Regulation Executive' and the HPRA over the summer. Consultation of the document will follow in due course.</p>

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f) <i>New questions asked after initial assessment of mock-ups</i>	f) The action for this point is the same as for point d).	See point d)
g) <i>Although the PLS was felt to be clear, some felt there was scope to shorten and simplify it.</i>	g) The PLS is currently under revision; further detail in comments above.	See above

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<p>Pharmacovigilance:</p> <p>The overall level of service from the pharmacovigilance team was scored good or excellent by 70% of respondents. Seven of 11 parameters were scored as good or excellent by over 70% of responders, but four were scored below this threshold. Parameters scoring less well were speed of response to enquiries (63%), pragmatism when assessing the detailed description of the pharmacovigilance system (DDPS; 59%), quality of case narrative summaries (56%) and handling of duplicate reports (50%). There was also a trend for higher scoring parameters to be lower than in the 2011 survey where comparison was available. This area was identified for qualitative follow-up. The number of respondents available for feedback on this topic was low, but relevant comments are captured below in italics.</p>		
<p>a) Speed of response to enquiries</p>	<p>a) We are increasing the resource in the team and replacing temporary personnel with permanent members of staff as part of the plan to deal with the growing number of reports received (up by ~50% since the last survey).</p> <p>A further change has been made to increase efficiency of dealing with PSUR queries. A new shared mailbox has been set up to ensure that if one member of staff is on leave, email enquiries are automatically picked up by a colleague. Information on this is due for publication later in July in MAVIS online.</p> <p>Speed of response to all types of queries that the pharmacovigilance team deal with will also be picked up in the organisation-wide review (see communications points e) and f), below).</p>	<p>Set-up of shared mailbox for PSUR queries: completed.</p> <p>MAVIS article drafted and due for publication by end July</p>

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<p>b) Pragmatism when assessing the DDPS</p>	<p>b) No further detail on this issue was volunteered in the qualitative feedback phase but the team is aware of industry concerns over the cost and administrative work associated with changes/updates to the DDPS.</p> <p>The VMD supports the principle of a DDPS master file; furthermore, where possible we allow any changes to await formalisation until the next time a variation is submitted. We are signed up to the principles set out in the CMDv working group's pilot to accept a declaration in new DCPs that the DDPS has previously been assessed, though we have not yet seen great uptake of this from industry. Action progressing beyond measures of this kind will only be possible under the review of the EU legislation.</p> <p>Assessor pragmatism may have been influenced by staff changes and familiarisation with new roles, but team induction and training processes are embedded in the team and are ongoing. No further action considered necessary.</p>	<p>We are working to be as pragmatic as we can within the current legislative framework and we are contributing our views in the revision of the EU veterinary medicines legislation.</p>

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<p>c) Quality of case summaries – <i>Insufficient information in the Clinical Summaries leading to ambiguous causality. More information should be given, e.g. what led up to the incident, timing of administration of the product, outcome / quality of recovery, dose used (rather than weight of patient)</i></p>	<p>c) In the past case summaries have been kept concise, taking into account the information that is transmitted in other fields. However, in light of previous enquiries on this matter the team has recently moved towards including more detail within the case summary narrative.</p> <p>The level of detail in case summaries is somewhat limited by what information is received. The fields denoting data we request are set out on the paper and online reporting forms and although the names of the fields to be completed don't match these topics word for word, we consider that they do usually encompass this information.</p> <p>Most reports are received online where provision of a contact email address is compulsory. However a significant number of paper reports continue to be received and if no contact details are volunteered our ability to follow-up is limited. Last year we therefore updated our paper forms to also request the reporter's email address and telephone number. We are also preparing an article for the veterinary press to stress the importance of good reporting practices.</p>	<p>Field for contact email has been added to paper adverse event report forms: completed.</p> <p>Article for veterinary press to encourage good reporting practices: in progress.</p>

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<p>d) Handling/nullification of duplicate reports</p>	<p>d) Qualitative feedback on this topic was sparse; however, this was one of several questions added to the 2014 survey to gauge stakeholder views on areas we had received prior feedback on following our change in practices from deleting duplicates to nullifying them. We have also moved away from automatically keeping our report to keeping the report which contains the best level of information on the case. We are aware that this change is slightly more time consuming but feedback received so far suggests an initial positive reaction to this approach and it has clear benefits when it comes to keeping an audit trail. It is possible that the increase in processing time has contributed to the score on speed of response to queries, which in turn may have increased the number of duplicate reports to be dealt with. This aspect will be picked up in the organisation-wide review of the same topic (see communications points e) and f), below).</p> <p>In an effort to try to reduce the number of duplicate reports, the team has introduced automatic checks for similar reports to the database. We are also adding a question to the online reporting forms to check whether the company has been informed also, in which case the report will not be progressed further until we have heard from the company.</p>	<p>A change request has been submitted to add a question to the online reporting forms to check whether the company has been informed. IT working on this currently.</p>

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<p>e) Gold plating in the Periodic Safety Update Report assessment: <i>VMD request for annual sales figures felt to be a local requirement and to be above what is specified in Volume 9B of Notice to Applicants</i></p> <p>f) Notifying MAHs of reports: <i>one view held was that there was a "lack of confidence that MA holders were notified of all Suspected Adverse Events received by VMD"</i> <i>Although serious adverse events were reported on the Eudra Vigilance this a) did not include less serious cases and b) the website is "not user-friendly" so cases were not easy to pick up.</i></p>	<p>e) The request for annual sales data is set out in the national Veterinary Medicines Regulations (VMR). The purpose of this is to enable calculation of incidence figures on a calendar year basis, for example where comparison of reports for one active substance across a number of authorisations is required. The VMR are revised at regular intervals and undergo a public consultation period prior to adoption; this issue has not been raised during recent consultations on draft VMR. No action considered necessary.</p> <p>f) One instance which could lead to this perception is reports where the VMP involved cannot be confirmed, which are consequently not relayed to the MAH. In order to address this the team has been making greater efforts to identify the products used or make the best educated guess; this is then noted in the case summary. This approach is in line with discussions at the EV Vet Joint Implementation Group.</p> <p>The other possible cause of this perception may be occasions where a delay has occurred in our forwarding a report to the MAH. To tackle this the team's software has been updated with a report tracking system which will be used to tighten up timelines on which reports are processed, and which will help ensure no reports get overlooked. Implementation of this is currently in progress and when up and running it will be an auditable way of monitoring the team's efficiency in this area.</p>	<p>N/A</p> <p>A tracking system for reports has been developed and added to the system; embedding is underway and will include linking report tracking with target timelines.</p>

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g) Overall satisfaction	g) Over 70% scored overall satisfaction with the pharmacovigilance team, but due to the lower scores in several areas the team plans to hold a pharmacovigilance industry information day to discuss the issues and work together as we progress the various planned actions.	The programme and scheduling for this will be planned over the summer, with the date envisaged for the last quarter of 2014.

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<p>Enforcement:</p> <p>The overall level of service scores were polarised, with approximately a third of respondents scoring in each category of excellent, average and poor. However, although objective trend comparisons could not be made since this was a new section in the 2014 survey, no respondent indicated that the level of service had declined since a year ago. In addition it should be noted that only 12 people responded to this section of the survey and therefore there is a low base on which to interpret the results.</p> <p>This area was identified for qualitative follow-up which identified three main reasons for low scores. Qualitative feedback for follow-up is captured below in italics.</p> <p>Note: The enforcement team deals with reports of illegal advertising of unauthorised veterinary medicines (the legislation team deals with reports relating to authorised VMPs).</p>		
<p>a) Communication on outcome of reporting incidents (product related)</p> <p>i. <i>“reports on suspected illegal products appear to have gone into a black hole with no information being supplied by the VMD”</i></p>	<p>a)</p> <p>i. The VMD is sympathetic to the point made but we cannot breach confidentiality or data protection law by sharing details of ongoing cases with third parties. Doing so could also prejudice future enforcement action. (This also relates to advertising-related reports.) Since April 2013 the standard report acknowledgement email has invited people to contact the team if they have further questions; people are encouraged to do this. Specific updates can only be given after the investigation has been concluded. Prioritisation of limited resources means the enforcement team does not currently plan to proactively send updates, but the view will be fed into work already ongoing in the team to review communications.</p>	<p>The enforcement and communications teams are working together to explore ways of becoming more public-facing. Initial plans include future publication of information on numbers of reports received.</p>

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<p>ii. <i>“Some cases were reported on MAVIS and on the website but these tended to be the larger cases only”</i></p>	<p>ii. We are only able to publish details of cases that have resulted in formal enforcement action – improvement notices, seizure notices and prosecutions. In accordance with our published enforcement strategy, we seek to secure compliance with the law through education and advice. We will only take formal enforcement action where that has failed, where there are repeat offences or where there is a serious risk to public health. We cannot give details of cases that we have resolved through constructive dialogue as this would conflict with our obligations under data protection legislation and could prejudice any future enforcement action. However, we are working with the communications team to explore ways of becoming more public-facing; see a i) above.</p>	<p>As for a) i) above.</p>
<p>iii. <i>“Request for more transparency on the process that the VMD follows during enforcement, and the time scales used”</i></p>	<p>iii. The enforcement strategy is published on the VMD website (http://www.vmd.defra.gov.uk/mswd/enforcement.aspx) and sets out the general principles and approach the VMD takes to enforcement of the VMR. Complaints are logged on a bespoke software system and processed according to defined procedures. Escalation takes place at trigger points set out in the team’s SOP. Unfortunately, the individual nature of cases means that the procedure does not lend itself well to generalised description. However, the team plans to draft a new page on the website summarising the way it works in a more reader-friendly way than in the enforcement strategy, and the overarching issue will be fed into work already ongoing in the team to review communications.</p>	<p>Text on the work of the enforcement team is being drafted for publication on our website.</p> <p>Please also see a) i) above.</p>

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<p>b) Communication on outcome of reporting incidents (advertising related) <i>If the reported materials continue to be used in the field the reporter cannot tell whether this is because they are legal, because the VMD has not acted, or because they are still being used illegally.</i></p> <p>c) VMD lack of action/only tackle selected cases <i>- split opinion, with some perceiving that only high profile cases were pursued, and others feeling that small companies/individuals were more likely to be followed up.</i></p> <p>d) A stakeholder view was that they pay their fees to the VMD but receive insufficient support in enforcement matters</p>	<p>b) The VMD is sympathetic to the point made but cannot breach confidentiality or data protection law by sharing details of ongoing cases with third parties. (This also relates to product-related reports) Since April 2013 the standard report acknowledgement email has invited people to contact the team if they have further questions; people are encouraged to do this. Specific updates can only be given after the investigation has been concluded. Prioritisation of limited resources means the enforcement team does not currently plan to proactively send updates.</p> <p>c) All reports are logged and processed through the same procedure set out in the team's SOP. The polarised views received on how the VMD prioritise the action it takes highlight the need to improve communication (despite the constraints noted in b) above). This concern will be taken into account when drafting the new page on the website (see a)iii).</p> <p>d) The enforcement team is entirely funded by the taxpayer, and receives no money from fees paid by industry. At present, Defra's budget is restricted and the team prioritises work within the limited budget available.</p>	<p>N/A</p> <p>Text on the work of the enforcement team is being drafted for publication on our website.</p> <p>N/A</p>

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<p>Export Certificate Scheme:</p> <p>Questions on this area were asked of people who had indicated interaction with pharmaceutical or immunological assessors, pharmacovigilance, GMP/GDP and administrative teams in the previous 12 months. Fewer than half of these respondents were aware of this service, and of those only a third had used it. The overall level of service scored below 70% good or excellent (63%) by people who had used it 'sometimes' or 'regularly', although this question had only 16 respondents.</p>		
<p>a) Awareness of the scheme</p>	<p>a) Although fewer than half of respondents were aware of the scheme, over 70% of these had ever used it which suggests that export certificates may not be of relevance to those who were unaware of the scheme. While not part of any questions on the export certificate scheme, identification of the correct person to contact with queries was identified as a VMD-wide area for follow-up. This work may help improve overall access to information on the scheme for people who need to use it. No further action considered necessary.</p>	<p>(see communications, below)</p>

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b) Overall level of service	<p>b) As noted, the base for this response was very low (16 respondents), meaning that it must be interpreted with caution. Furthermore, this is the first time this question had been included in the survey so there is no historical trend data for comparison. Nevertheless, we recognise that the system has undergone some changes recently in response to concerns over fraudulent applications and it is possible this has had an effect on the level of satisfaction. The team has previously published updates in MAVIS and will continue to do so; in a separate action point we are looking into ways of further promoting of MAVIS as a source of VMD updates and information.</p>	<p>An article to share information on recent changes has been drafted for publication in MAVIS and will be made available once it has been cleared by the 'Better Regulation Executive'.</p>

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<p>Immunological team:</p> <p>The immunologicals (biologicals) team had improved in all areas compared with the 2011 results, with 93% of respondents scoring them good or excellent. Speed of response to enquiries was the only parameter which fell just under the 70% good/excellent score, at 69%. (It should be noted that only 12 people responded to this section of the survey and therefore there is a low base on which to interpret the results.)</p>		
a) Speed of response to enquiries	a) No team-specific actions are planned for this result, but this area will be picked up in the organisation-wide review of the same topic (see communications points e) and f), below).	(see communications, below)

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<p>Finance:</p> <p>Most parameters were scored good/excellent by over 70% of respondents and all had improved since 2011. Ease of identifying the correct person to speak to (65%) and transparency of fee structure (59%) fell below the 70% threshold.</p> <p>People who indicated they had interaction with pharmaceutical assessors, immunological assessors, licencing administration and GAT in the last 12 months were asked about their views on the fees calculator. Awareness of it was limited, with only 15% of respondents having used it at least several times, and 43% unaware of its existence. 68% of those who had used it felt it was useful.</p>		
<p>a) Ease of identification of person to speak to</p>	<p>a) This score had increased a little since the last survey although fewer than 70% of people gave a score of good/excellent (65%). No qualitative feedback on this was received to aid in interpretation of this score during the 2014 survey, but in 2011 people interviewed indicated that they contacted the person named on the invoice who was either able to help them or knew who to direct them to. No team-specific follow-up on this is planned, but this aspect will be picked up in the organisation-wide review of the same topic (see communications points e) and f), below).</p>	<p>(see communications, below)</p>

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<p>b) Transparency of fee structure</p>	<p>b) Although the score for this question was below 70% good/excellent (59%) it had increased by 10 percentage points since the last survey.</p> <p>Regarding transparency, fees are set out in the VMR and are publicly available there and in the fee summary sheets on the website. However, we recognise that the fee structure is complex and not very user friendly which is why the fees calculator (originally developed as a tool for the general assessment team) was adapted and made available for stakeholders to use.</p> <p>Currently the fees calculator allows people to obtain an indication of the approximate cost of an application, and is also intended to help work out what grouping of variations would be most cost efficient.</p> <p>Fundamental changes to the structure of the fees cannot be made without a change to the national legislation. It is unlikely that a review of this scale would be envisaged before the EU veterinary medicines legislation is revised.</p>	<p>No action considered necessary.</p>

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<p>c) Awareness of fees calculator</p> <p>d) Usefulness of fees calculator</p>	<p>c) Of the people who were asked this question, only 15% had used the fees calculator at least several times and 43% were unaware of its existence. It is difficult to tell whether this is a true gap in awareness, or whether the fees calculator is not relevant to the work area of some respondents (e.g. those solely involved in R&D). Nevertheless, we intend to flag it up in MAVIS as an available tool, and this will tie in with promotion of MAVIS planned in point b) under communications, below.</p> <p>d) Of those people who had used it, 68% felt the fees calculator was useful. Although below the threshold 70%, this is encouraging given the low score on transparency of fees. Further refinement of the fees calculator is envisaged, but currently other areas are higher priority for our limited IT resources. This will be progressed when resources become available.</p>	<p>Fees calculator demo was available at the June industry info day; it will be highlighted as an available tool in forthcoming editions of MAVIS.</p> <p>Development and refinement of fees calculator: on hold</p>

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<p>Communications:</p> <p>There were three broad areas for follow-up: performance against communications charter (79% felt it was met at least most of the time, but this was lower than in 2011 [85%]); timeliness of licensing articles in MAVIS (65% scored good/excellent); ease of finding things on the website (59% scored good/excellent).</p> <p>A further cross-team issue was identified: efficiency in responding to enquiries, including speed of response. Combined scores of good or excellent which fell below 70% were received by the pharmacovigilance and immunological teams for this parameter. Furthermore, in the open question of what could increase satisfaction with the VMD, of the 40 who responded, 20% indicated that improvement in timelines/response times would increase satisfaction and the same proportion considered that improvement in communication/ known point of contact would increase satisfaction with the VMD.</p> <p>Speed of response to queries was a question asked for the following work areas: licensing administration (70%), validation (80%), pharmaceuticals (88%), immunologicals (69%), pharmacovigilance (63%), finance (83%). Ease of identification of the correct person was a question asked for the following work areas: validation (73%), pharmaceuticals (79%), immunologicals (75%) [note, not asked for phv], finance (65%)</p>		
a) Performance against communications charter	a) Despite dropping since 2011 this still scored relatively high; follow-up relating to finding the right person to ask, and speed of response are addressed in point f) below.	N/A

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<p>b) Timeliness of licensing articles in MAVIS</p>	<p>b) It is difficult to identify further detail on the dip in satisfaction on timeliness of MAVIS articles since this question was not covered in the qualitative follow-up. However MAVIS is published quarterly and articles are frequently available online before the electronic document is circulated; it is possible that awareness of the regular updating of online content is lower than awareness of the quarterly bulletin circulated.</p> <p>In addition to this when people were asked whether they were aware of information relevant to authorisations such as the fees calculator a split was seen between people who were members of NOAH and people who weren't. This raised the question of whether information and news was being transmitted as effectively to industry stakeholders who are not members of NOAH.</p> <p>In light of this, a tag highlighting the availability of MAVIS (quarterly and online) and also the website RSS news feed is planned for inclusion on certain standard email templates in order to publicise these sources of information more widely.</p>	<p>Concept of email tag agreed, to be implemented during the summer.</p>

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c) Ease of finding things on the website	<p>c) Although scoring lower than other parameters in this area, the ease of finding things on the website has been steadily improving with time (2009: 37%; 2011: 50%). In the coming months the factor which will most affect the website is the move to GOV.UK and this is where we will be focussing our attention to make the move as smooth as possible and to keep you informed during the process (see d) below). We will return to this question in the next customer survey to evaluate ease of finding things on the website in its new GOV.UK home.</p>	See d)
d) GOV.UK – upcoming changes and how we will manage them	<p>d) The survey results indicated that over half of respondents (54%) did not know that some VMD content had to move to the GOV.UK website.</p> <p>The first wave of transition of VMD website content to gov.uk is due to begin in the autumn, starting with the areas which see highest traffic (including the product information database, information leaflets, import certificate schemes and others).</p> <p>Bookmarks to our current VMD website will continue to work but will redirect to the gov.uk page if the content has moved. Before a page is moved it will be saved in the National Archives for reference but it will not continue to be updated.</p> <p>Information on progress with this project can be found by hovering over the GOV.UK notice at the top left of the VMD website homepage (http://www.vmd.defra.gov.uk/).</p>	Ongoing

Issue Identified in Survey	Proposed Action or explanation why no action is considered necessary	Progress
<p>e) Cross-organisational speed of response to queries</p> <p>and</p> <p>f) Cross-organisational identification of correct person</p>	<p>e), f) These two aspects were identified on reviewing the range of scores received across teams. While largely receiving scores of over 70% good/excellent, the variability suggests there is scope for sharing best practice across the organisation.</p> <p>Follow-up of speed of response to queries and the ease with which the correct person to speak to can be identified will therefore be rolled into a pre-existing, ongoing internal project on handling enquiries led by the quality and communications team. This is a medium term project and is not expected to conclude within the customer survey action plan period but we will make the conclusions and outcomes publicly available via our website and MAVIS.</p>	<p>The handling enquiries project is ongoing; integration of the two areas identified from the customer survey results will be progressed over the course of 2014 and work is expected to continue into the following year.</p>

Issue Identified in Survey	Proposed Action or explanation why no action is considered necessary	Progress
<p>Europe:</p> <p>Respondents scored the VMD first in nine out of ten parameters, coming second to Ireland on overall value for money. Results also indicated that fewer than 70% of respondents were likely to use the VMD for immunological applications via DCP or MRP (63% and 62%, respectively). The final question where the VMD scored below 70% was on relevance of questions asked in DCP/MRP applications when the UK was a CMS (68% relevant or very relevant). Where free text comments were made in the survey these have been paraphrased and captured in italics below.</p>		
<p>a) Value for money compared with IE: <i>IE does not charge for type 1a variations; fees in IE felt to be more reasonable; the IMB is also a full cost recovery agency. Irish fee structure easier to understand</i></p>	<p>a) Our application fees are based on the average cost of work in assessment; time spent on different applications is monitored via work recording software which feeds directly into the fee calculations. Our charges are regularly reviewed, and while we continue to charge for type 1a variations we have recently reduced the fees for national variations which passed validation from 1st April 2014. Review of fees charged is an ongoing part of our work with review of EU variation fees planned to start November 2014; no further action considered necessary.</p> <p>Please also refer to comments on transparency of fee structure above.</p>	<p>No further action considered necessary.</p>

Issue Identified in Survey	Proposed Action or explanation why no action is considered necessary	Progress
b) fewer than 70% of respondents were likely to use the VMD for immunological applications via DCP or MRP	b) This is a difficult parameter to interpret. While falling below 70%, scores had risen somewhat since the 2011 survey. Reasons for choosing the VMD as RMS could be influenced by the relatively high numbers of immunological (biological) products which are eligible for the centralised application route, to which this question is not relevant. No action points have been identified for this result.	N/A

Glossary of acronyms:

CMDv – Co-ordination group for mutual recognition and decentralised procedures

DGP – Decentralised procedure

DDPS – detailed description of the pharmacovigilance system

IMB (now HPRA) – Irish Medicines Board (now Health Products Regulatory Authority)

MAH – marketing authorisation holder

MAVIS – marketing authorisation veterinary information service

MRP – mutual recognition procedure

NOAH – National Office of Animal Health

PLS – product literature standard

QRD – quality review of documents

SOP – standard operating procedure

VMD – Veterinary Medicines Directorate

VMR – Veterinary Medicines Regulations