

# New-style case report survey

## The PMCPA's response

### Introduction

On 14 January 2026, we published three case reports in a new style. This was part of a pilot, aimed at improving the accessibility, clarity and readability of our rulings.

Alongside those cases, we published a survey aimed at all those who receive our case reports to:

- seek feedback on our proposed changes, and
- invite additional suggestions for improvements we could make to our case reports.

We would like to thank all those who took the time to provide their feedback. We have reviewed all the responses and today we are publishing the results of the survey and our response to the feedback received.

Our analysis of the responses is set out below. We have provided our view on specific suggestions and why we plan to implement some and not others. We have also produced a slide deck showing the exact responses to each of the multiple-choice questions (see the Annex below).

### Overview of survey responses

The survey ran from 14 January to 6 February 2026. It was sent to all those that subscribe to our e-alerts. We also promoted it on social media. Responses were welcomed on a named or anonymous basis.

We received 48 responses. 29 of the respondents identified as being pharmaceutical company employees. The remainder identified as being contractors, agencies and other third parties.

The survey contained both open and closed questions and answer methods were a mixture of multiple-choice questions and free text boxes, allowing respondents to provide a full range of views. All comments sent via the survey (or emailed to us separately) were considered during our analysis.

### How do you read our case reports?

#### Pdf or html version

We asked two questions about the way in which our users read case reports.

The first related to which version of the case report people read. We have two versions of each case – a pdf version (that opens as a separate document) and an html version (that can be read directly on the webpage). By ensuring we have an html version, we achieve greater visibility of our cases on search engines, and this improves transparency and accessibility of our cases.

More than half of users (58%) read the html version. The remainder either read the pdf version, or read the pdf version after reading the case summary in the html version.

Our conclusion, based on the response to this question, is that we should retain both versions of our case reports, given the divergence of approach among our users.

### **Reading order**

We also asked about the order in which users read the three sections of our case reports – the complaint, the company response and the Panel ruling.

This was important to understand, because our proposed new style involves the Panel ruling being upfront with the submissions (the complaint and the company response) being in annexes.

4% of respondents only read the Panel summary. However, of the remaining 96%, there was an even split of:

- 48% who read the case report in the order in which it is currently laid out: complaint, response, then ruling
- 48% who navigate around the case report by reading only the ruling, by reading the ruling first, or by jumping from the complaint to the ruling

Regarding the first group of 48%, we considered that there may be an element of people simply reading case reports from start to finish in the order they are currently laid out. This survey result should therefore also be viewed in light of our specific question about what people thought of the pilot case reports in which the complaint and response were in annexes, to which the response was:

- 81.3% positive or slightly positive
- 12.5% negative or slightly negative
- 6.2% neutral

We concluded that the survey has endorsed our proposed approach of the ruling being upfront in the case report, with the complaint and response in annexes.

We received a good suggestion from one respondent that the case report should include 'return to top' hyperlinks in the annexes. We intend to implement this suggestion because not only will it aid navigability in long cases, but it will also allow those who prefer to read the case report in a different order to move between different sections easily.

## Your feedback on our proposed changes

### Multiple-choice questions

We asked 11 questions in which we asked for views on the specific stylistic changes we made to the case report in the three pilot cases. We asked respondents to choose one of the following answers:

- Positive
- Slightly positive
- Neutral
- Slightly negative
- Negative

Our conclusion is that 10 of these questions received a large majority of positive endorsement. More detail is included in the slides in the Annex but, in summary, the percentage of those who rated each change positive or slightly positive was:

- Numbered paragraphs (77.1%)
- Complaint moved to an annex (81.3%)
- Response moved to an annex (79.2%)
- 'Case preparation' section (79.2%)
- Table on page 1 with dates, etc. (83.3%)
- Clickable table of contents (91.7%)
- Explanation of redactions made (72.9%)
- Coloured headings (77.1%)
- Increased use of sub-headings (89.6%)
- Increased use of bullet points (91.7%)

The minority of respondents were neutral, slightly negative or negative about these changes.

We therefore intend to implement all of the above 10 changes.

The 11<sup>th</sup> multiple choice question related to our proposed inclusion of the PMCPA logo. Perhaps unsurprisingly (given the change does not impact the reader's experience), most responses (58.3%) were neutral about this. The current version of the case report is not labelled as a PMCPA report. We consider it is important to include this information, particularly if the report is downloaded and read in isolation from the website, and so we intend to implement this change too.

### Open questions

The survey also included open questions for feedback on the three cases we piloted in the new style.

We received a very large number of positive comments on the new style which were all on similar themes, such as:

- *"I found it much easier to understand the key points of the case in the new style, after which I could read the full complaint and response. Overall I liked the new layout and find it more user friendly."*

- *“I found it to be a much more digestible format and felt that I was able to get to grips with the details of the case more quickly and easily.”*

In relation to respondent’s specific comments on our proposed changes, our analysis of the key suggestions (i.e. those that were suggested by the most respondents), and our conclusions on which we intend to adopt, are as follows.

### Table on page 1

We received varying feedback on this table; some respondents would prefer more dates (such as the date the company sent its response to the PMCPA) whereas others would prefer fewer dates (such as removing the date of undertaking, on the grounds it is not of interest).

We believe it is important to strike the right balance between greater transparency of dates to show the stages in the case process, and ensuring case reports are succinct and avoid repetition.

We accepted the suggestion from some respondents that it is important to continue to include the case completion date because it creates consistency by allowing cases to continue to be viewed chronologically on our website by that date, whether they are in the old style or the new.

We concluded that in addition to the ‘complaint received’ and ‘case completion’ dates, the most important dates to include for transparency are the date the Panel (and the Appeal Board for appealed cases) reached its decision, and the date the Appeal Board reviewed the case prior to publication. We have also adopted a suggestion to state whether the Appeal Board imposed any additional sanctions or not.

We have removed the applicable Code and the relevant clauses because we agreed with the feedback received that this was duplicative of the case summary and case preparation sections.

Our revised version of the table on page 1 will therefore look like this:

<b>Case number</b>	Case/XXXX/MM/YY
<b>Complaint received</b>	DD MMMM YYYY
<b>Case title</b>	
<b>Complainant</b>	[e.g. Anonymous, contactable, described themselves as a health professional]
<b>Respondent</b>	
<b>Panel decision</b>	DD MMMM YYYY
<b>Appeal Board decision</b>	DD MMMM YYYY [To be deleted if no appeal]
<b>Case completion</b>	DD MMMM YYYY
<b>Appeal Board review*</b>	DD MMMM YYYY [include details of any additional sanctions]

\*All completed cases are reviewed by the Appeal Board (see Paragraph 15.4 of the Constitution and Procedure)

## Table of contents

Some respondents suggested that the table of contents should be the first feature of the case report. However, it is important to stress that the case summary is not part of the full case report and we therefore consider that the summary needs to appear first. The table of contents relates to the full case report and is for the purpose of navigating around that document.

We recognise that there is an element of duplication of allegations being listed in the case summary and then in the “background to the case” section of the full case report. However, we consider that to be an inevitable consequence of a summary; it needs to replicate and draw from the document it is summarising.

## Case preparation section

We received some useful feedback that it was potentially confusing for this section to refer to the Panel when it was headed “case preparation”. We agree and will therefore rename this section as “Background to the case” because it covers more than just case preparation and is ultimately drafted by the Panel rather than the case preparation manager.

We received some feedback that the case preparation section should explain why they considered that a ‘prima facie’ case had been established. We concluded that this was not necessary because it would essentially be the same rationale in every case. A prima facie case simply means that the case preparation manager, whilst not concluding there has been a breach, thinks that there is enough evidence to justify the Panel considering the case in more detail and issuing a ruling. We have recently amended our letter to the parties to every case, in which we notify them that a case has been referred to the Panel, to include the above explanation of what a prima facie case means. We also have a Q&A on this topic ([What does prima facie case mean?](#))

## Headings

We received much positive feedback about the increased use of headings. Respondents found this a very useful way to divide up a ruling and allowed a reader to navigate between sections as they read.

We received some feedback on making the wording of the headings more consistent. We will keep this in mind, while ensuring we retain the flexibility to use the most appropriate headings to guide the reader through the report.

## Numbered paragraphs

There appeared to be confusion in some feedback about how numbering paragraphs in the final case report would be useful for appeals, as we’d intended. To clarify, once the Panel has decided a case, its ruling will be sent to the parties with numbered paragraphs, in the same format as the final case report.

If there was an appeal, then the new style would give parties the benefit of being able to refer to the specific paragraph numbers of the Panel ruling that they wished to appeal. An appealed case report would have the Appeal Board ruling following on from the Panel

ruling, with a continuation of the numbered paragraphs. The appeal letter from the appellant would become Annex C. Any response to the appeal from the other party would be Annex D.

## **Annexes**

One respondent questioned the inclusion of the 'Annex notes' section. We included this in the pilot to provide greater transparency about why the Panel uses square-brackets to anonymise/redact certain information from the case report. However, we agree with the feedback that because this 'Annex notes' section would be the same wording in all case reports, it unnecessarily makes the case report longer. We will therefore move this 'Annex notes' wording, explaining the reasoning for anonymisation/redactions, to the 'Completed cases' section of our website.

We also received a suggestion that the introduction to Annex A (the complaint) should state what kind of complainant submitted the complaint e.g. whether they were a health professional, a member of the public, an ex-employee etc. We agree that this additional detail would be helpful and will incorporate this change.

We received one comment from a respondent with concerns that the company's response would be included verbatim in Annex B. However, since 2023 we have copied (rather than paraphrased) the complaint and response into our case reports, with appropriate redactions and anonymisation e.g. to protect personal data. The change we are proposing in this area is therefore a minor one of allowing the reader to see more accurately the word-for-word submissions of the parties.

## **Your other suggestions for inclusion in the case reports**

Our survey also invited suggestions for anything else you thought should be incorporated into a new style of case report as part of this reform process. We are very grateful to receive these suggestions, all of which we have considered carefully.

## **Case summaries**

We received some comments that the case summaries should provide more detail about the Panel reasoning. Finding the right balance between too little and too much information in a case summary is difficult. We recognise that case summaries can be helpful, for example in helping our users decide whether a case raises any specific points of interest for them. However, they are of course quite subjective and do carry the risk that readers may consider the key points to be different from those selected by the Panel.

Having said that, once we embed the new style later this year, we plan to revisit our case summaries as part of 'phase 2' of the evolution of our case reports.

However, one smaller change we plan to make in the meantime, in response to feedback from some respondents, is to list the clauses in the order in which the Panel has dealt with them in the ruling (rather than in numerical order). This will ensure that there is alignment between the summary table and the ruling that follows in the full case report.

## Clause 2 reasoning

Some respondents requested more explanation for why a Clause 2 breach had been ruled or not. We have already begun implementing this feedback. As part of the evolution of our Panel rulings, we provide where possible further rationale for the Panel's conclusions on Clause 2.

## Your suggestions which we will incorporate elsewhere

There were several suggestions we received where we agreed with the principle, but ultimately decided that these were initiatives we could take forward in other ways; rather than adding them to the new style of case report.

### 'Key learnings' from the case

We know that our case reports form an important part of learning for industry. We received a suggestion that case reports should therefore include 'key learnings'.

We have decided not to include this in the body of our case reports. Although something may be a key learning for the company involved, it may not be a key learning for the wider industry or vice versa. In addition, it is inevitable that industry practice, case precedent, the Code etc., will all evolve such that a 'key learning' may become dated and no longer relevant.

However, we recognise the overall importance of key learnings being shared shortly after cases are published, which is why we are implementing quarterly webinars this year. These webinars will focus on key cases or topics and allow the Panel to discuss rulings and draw out the key learnings from groups of cases. We think this is a more effective and contemporary way of keeping industry informed about case trends and what principles should be drawn from them.

### Copies of the relevant materials in a case

One respondent pointed out that the U.S. Food and Drug Administration include links to the material in their warning letters, and suggested that the PMCPA should do likewise. We recognise that this may be helpful to readers to understand what the Panel was ruling upon. However, we have decided not to proceed with this suggestion, for several reasons, such as:

- the potential for a case report itself to amount to promotion (US material may already be in the public domain because the US does not have the same restrictions on promotion to the public as the UK)
- the importance of not putting material back in the public domain if it has been ruled in breach of the Code and withdrawn
- confidentiality issues with companies about the use of their materials

Nevertheless, to take account of this feedback, we intend to explore the option of using case materials in our quarterly webinars, as we already do for some of our in-person training (such as our Code in a Day course).

## Ongoing cases

The PMCPA Constitution and Procedure requires us to publish details of ongoing cases. Although that term is not defined, we acknowledge that we could provide greater transparency around the number of cases that are at different stages of the process. We therefore plan to update this section of our website to provide more transparency about the number of cases that are at each stage of the complaints process – e.g. how many cases have been referred to the Panel and are awaiting adjudication.

## Conclusion

This blog does not cover every comment we received in the survey, but it reflects the suggestions and feedback that gained most support. We reviewed and considered every comment received and would again like to thank everyone that completed the survey. We now intend to revise the new-style case report as set out above and implement it across all our cases later this year. We believe this new style will achieve our stated aim of improving the accessibility, clarity and readability of our cases.

- Owen

**Annex - Slide deck on next page**

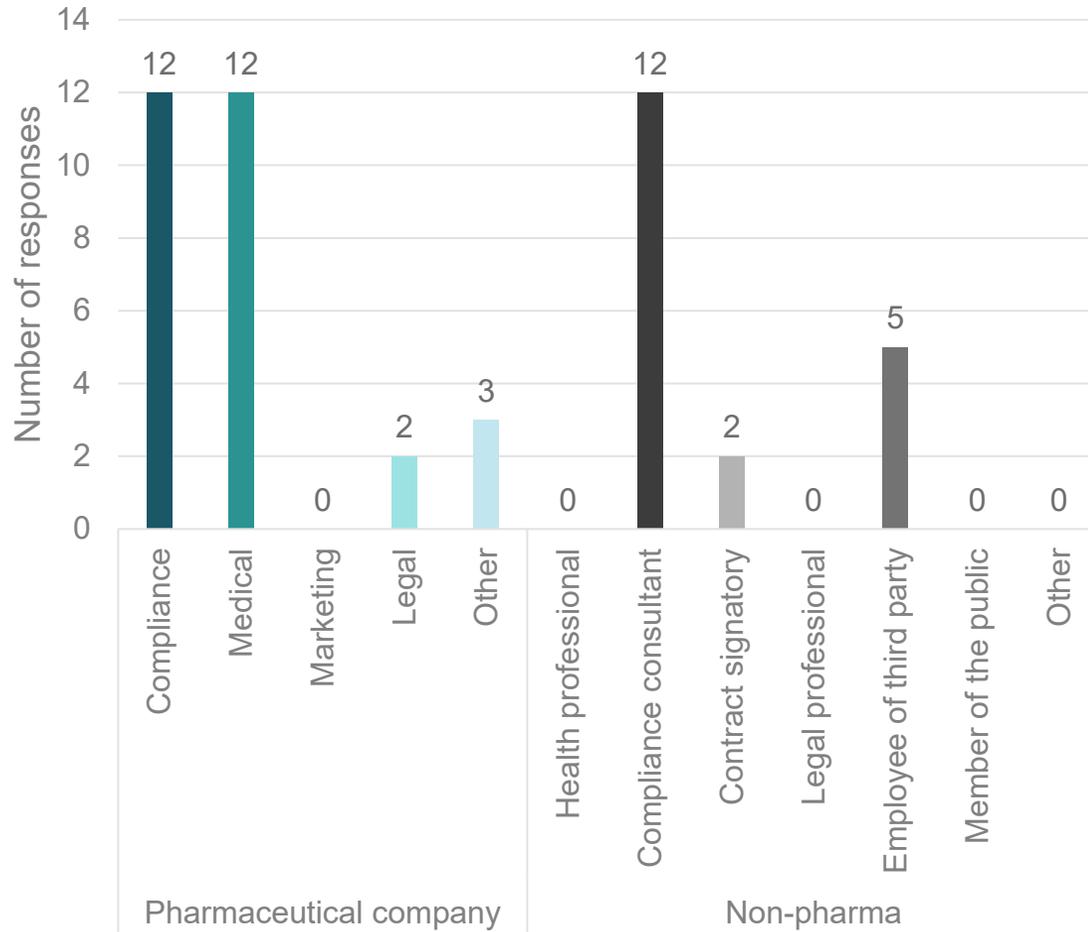
# Feedback received on new-style case reports

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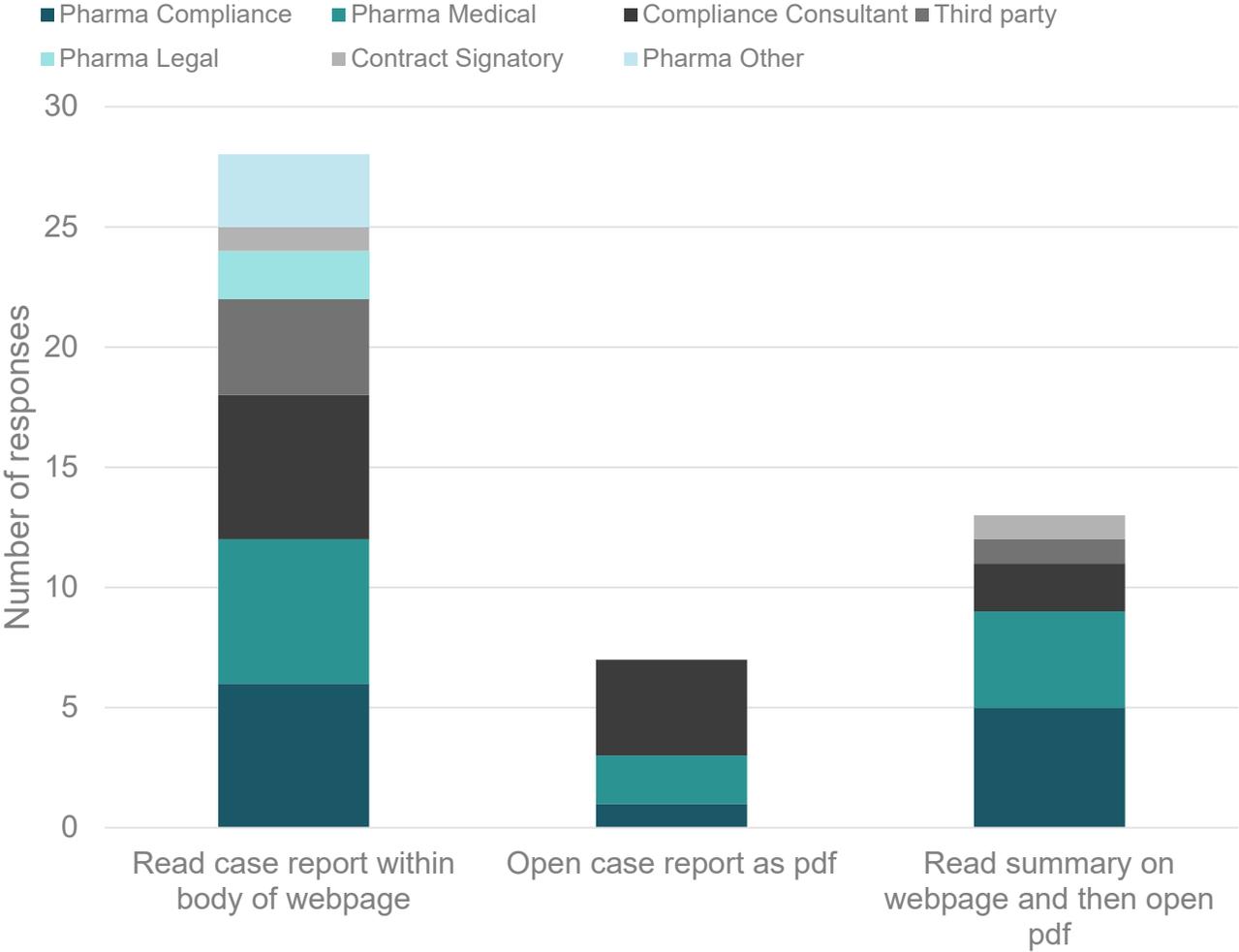
14 January 2026 to 6 February 2026

Upon publication of Case/0395, Case/0440 and Case/0466

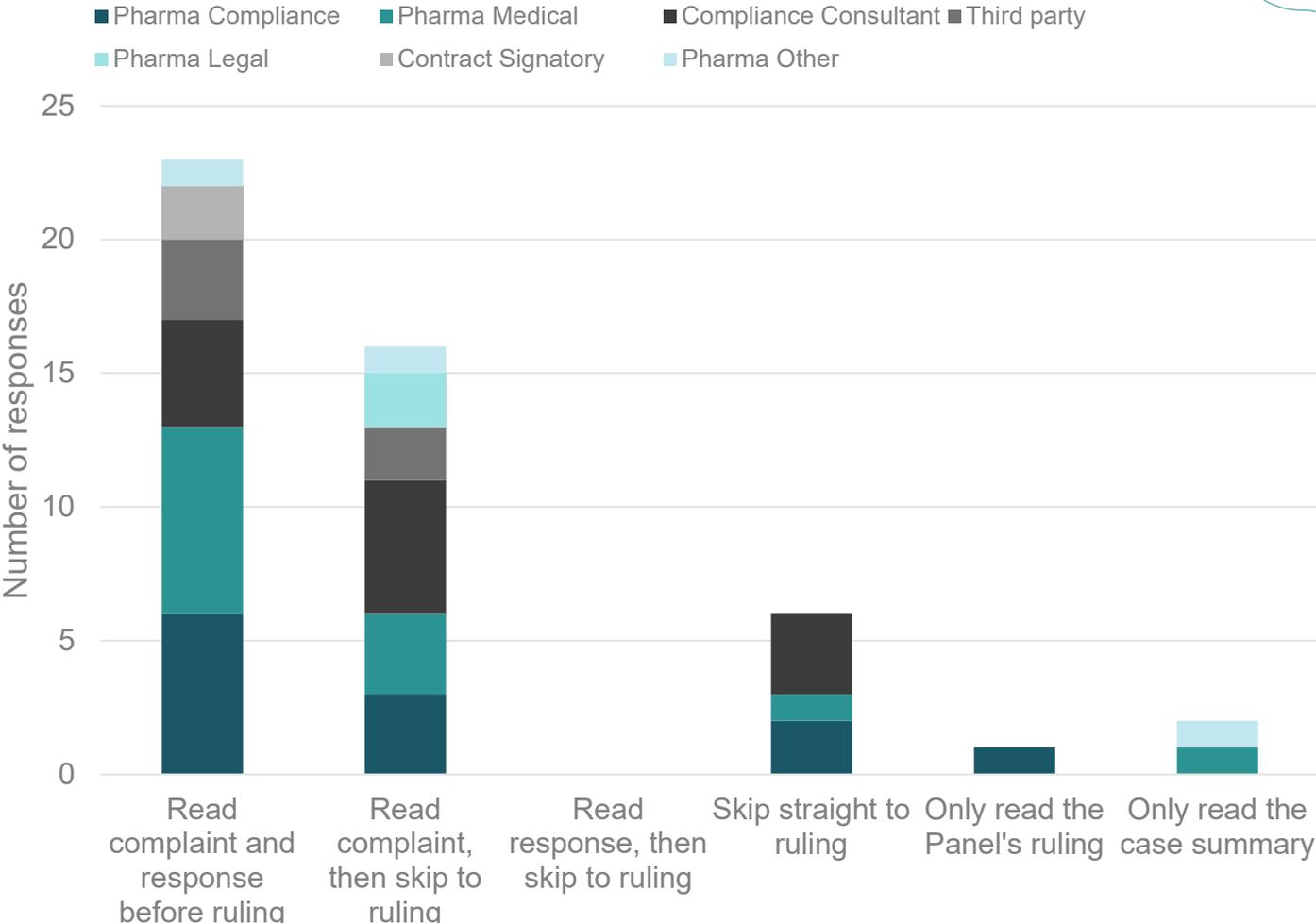
# 48 responses received



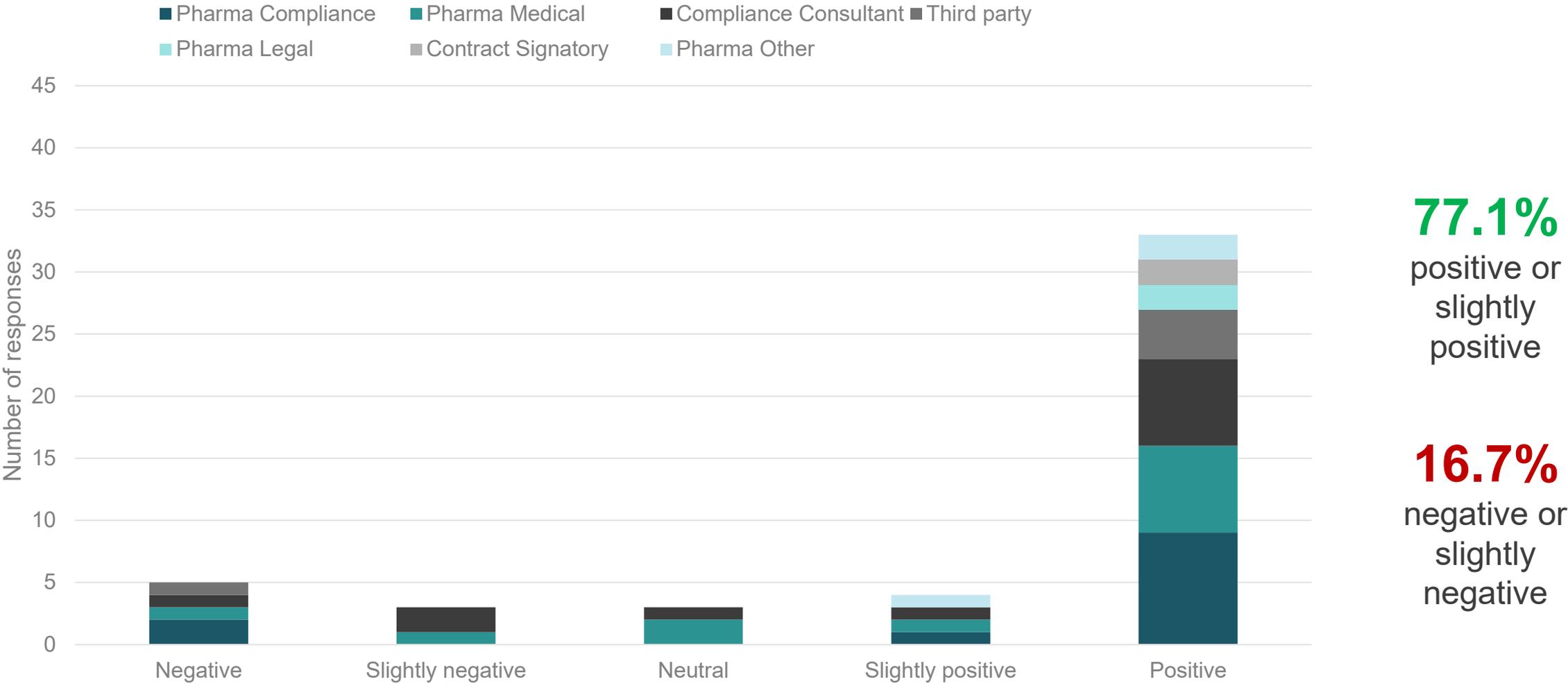
# How do people use the website?



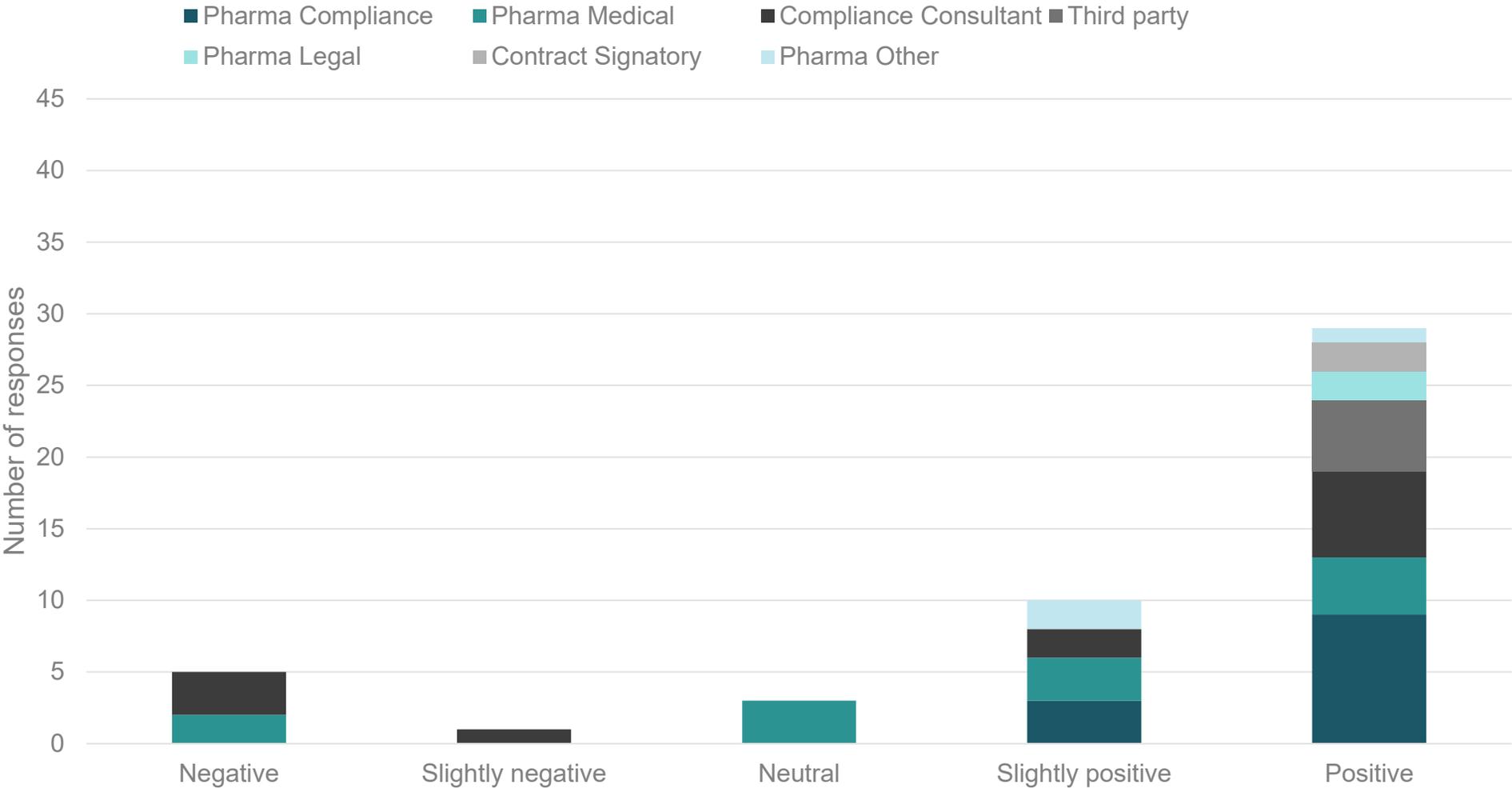
# How do people read the case report?



# How do you feel about... numbered paragraphs?



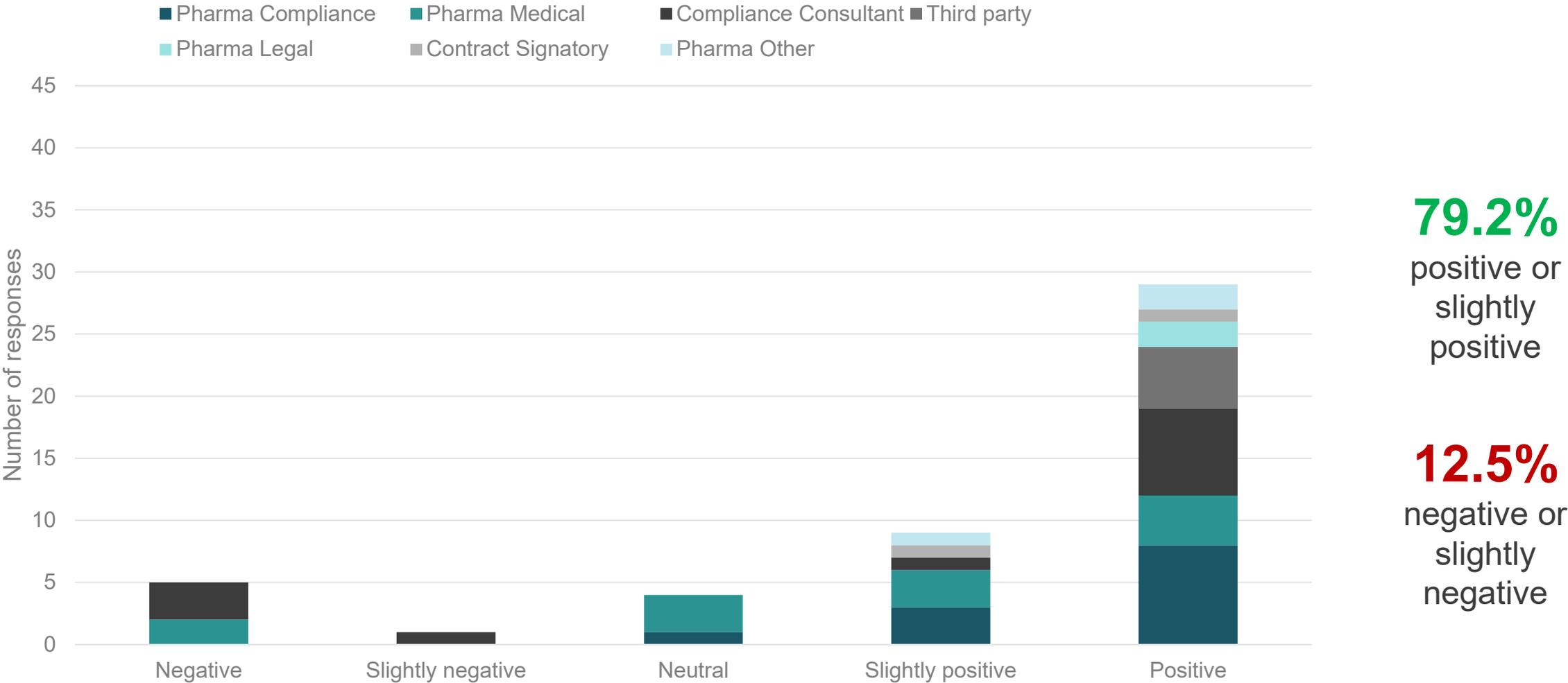
# How do you feel about... complaint moved to annex?



**81.3%**  
positive or slightly positive

**12.5%**  
negative or slightly negative

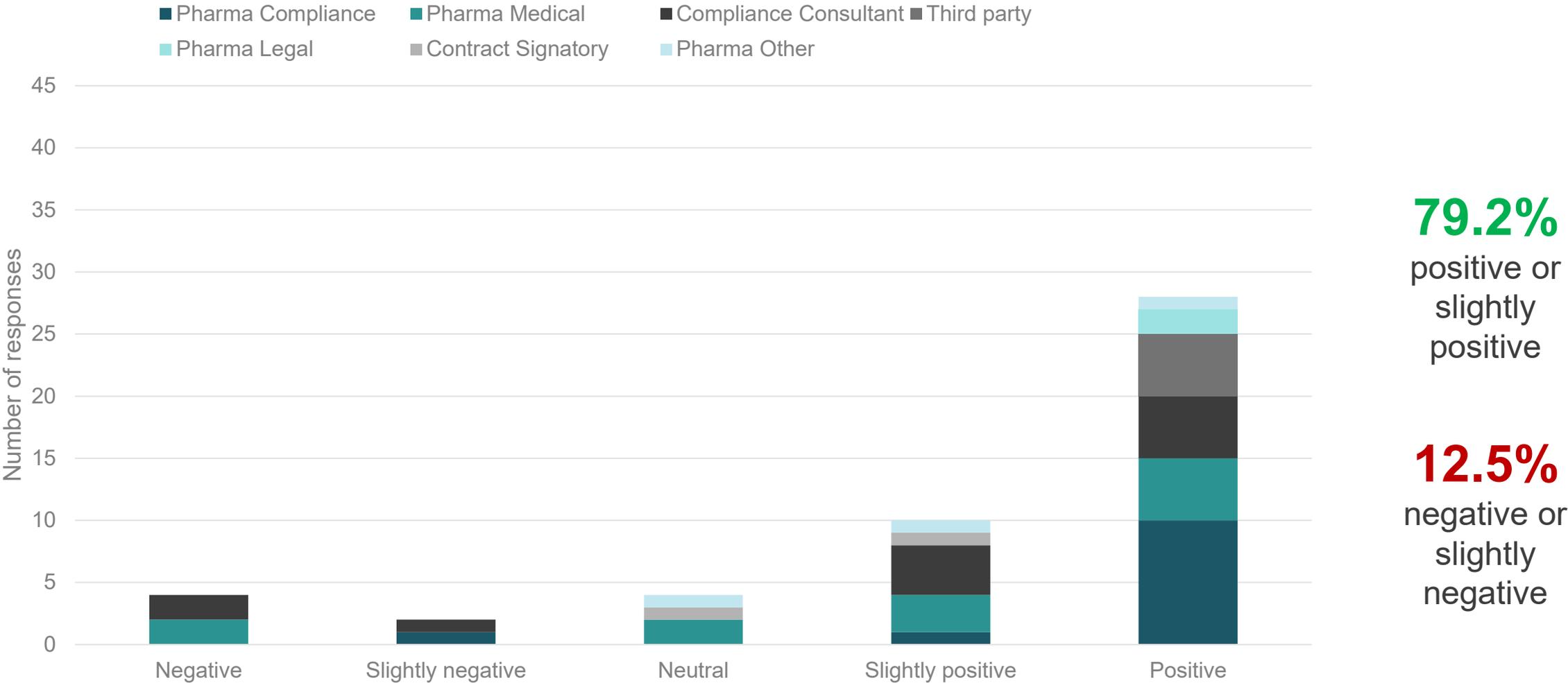
# How do you feel about... response moved to annex?



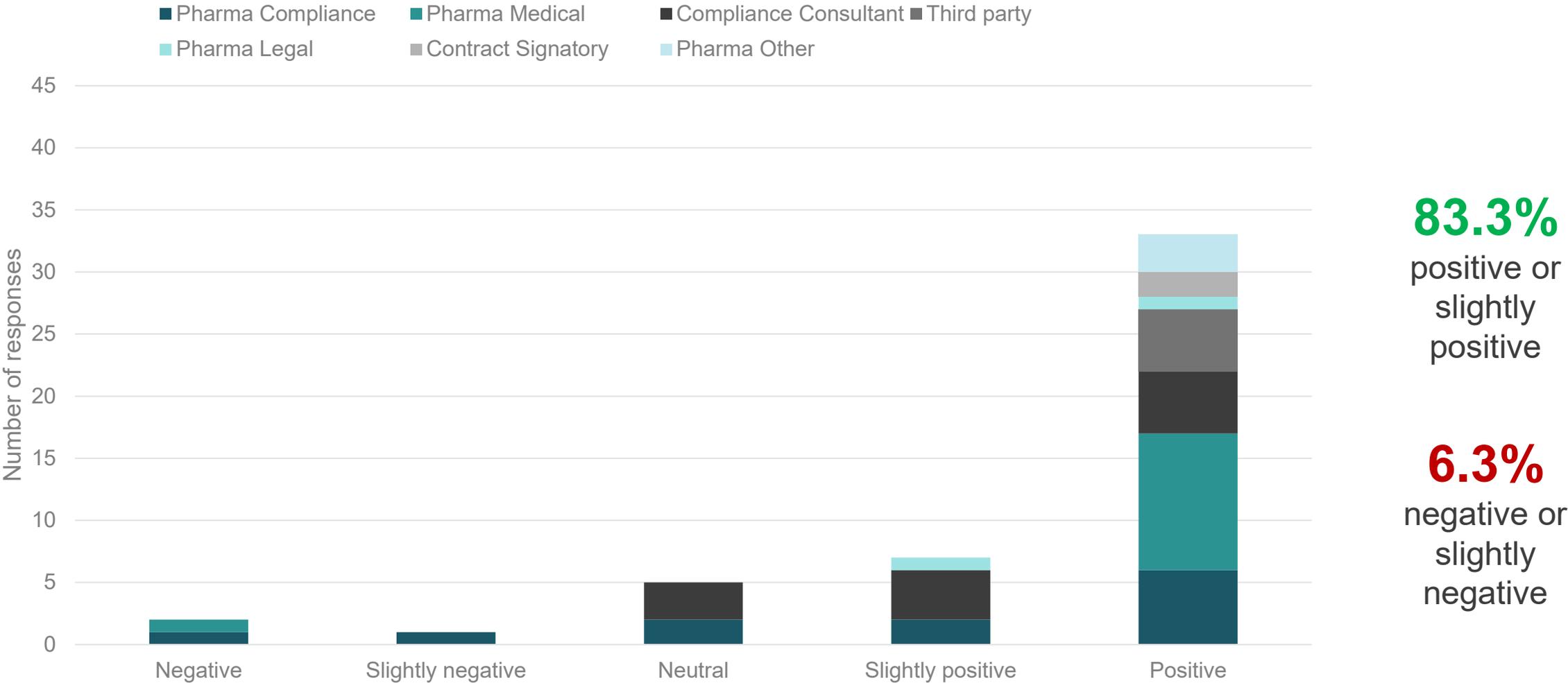
**79.2%**  
positive or slightly positive

**12.5%**  
negative or slightly negative

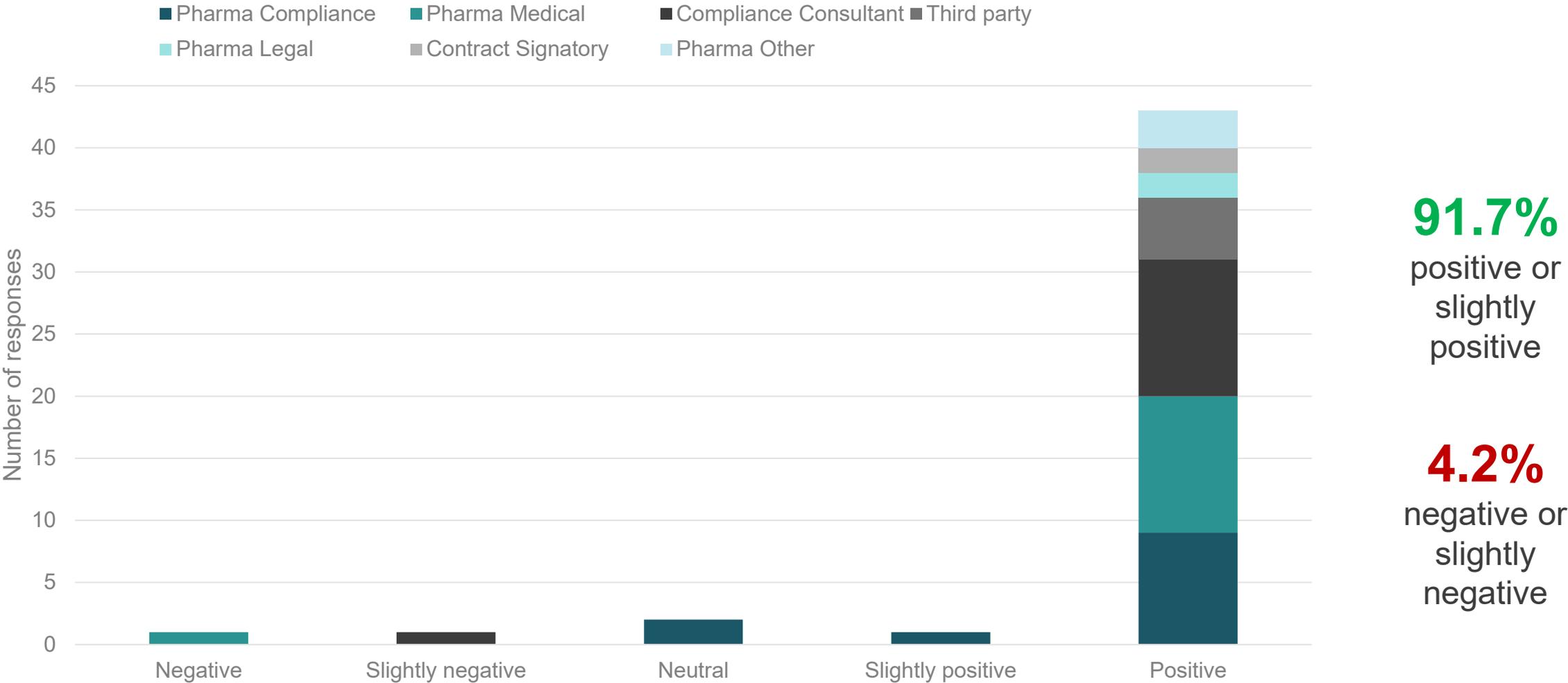
# How do you feel about... case preparation section?



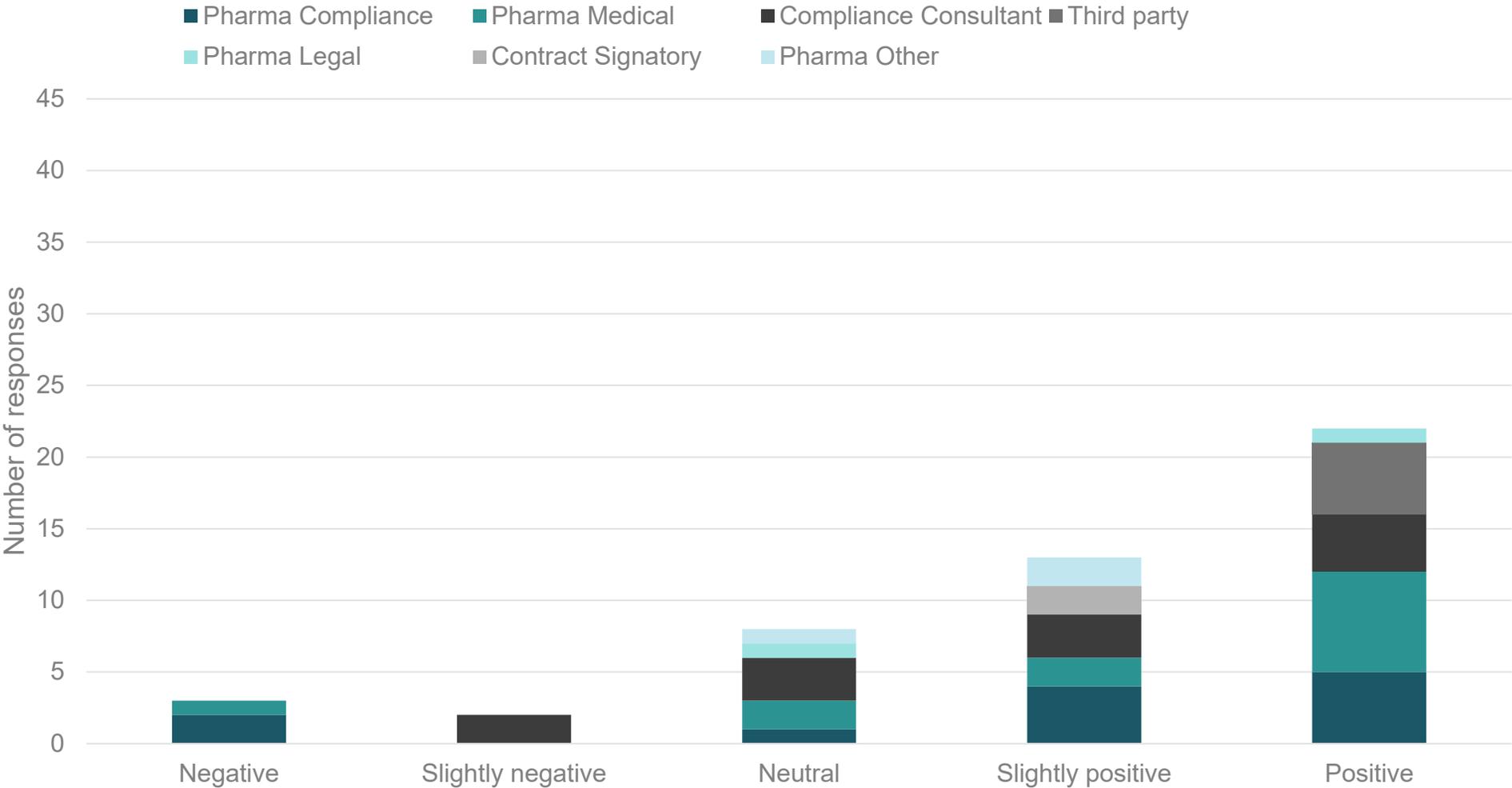
# How do you feel about... table on page 1?



# How do you feel about... clickable table of contents?



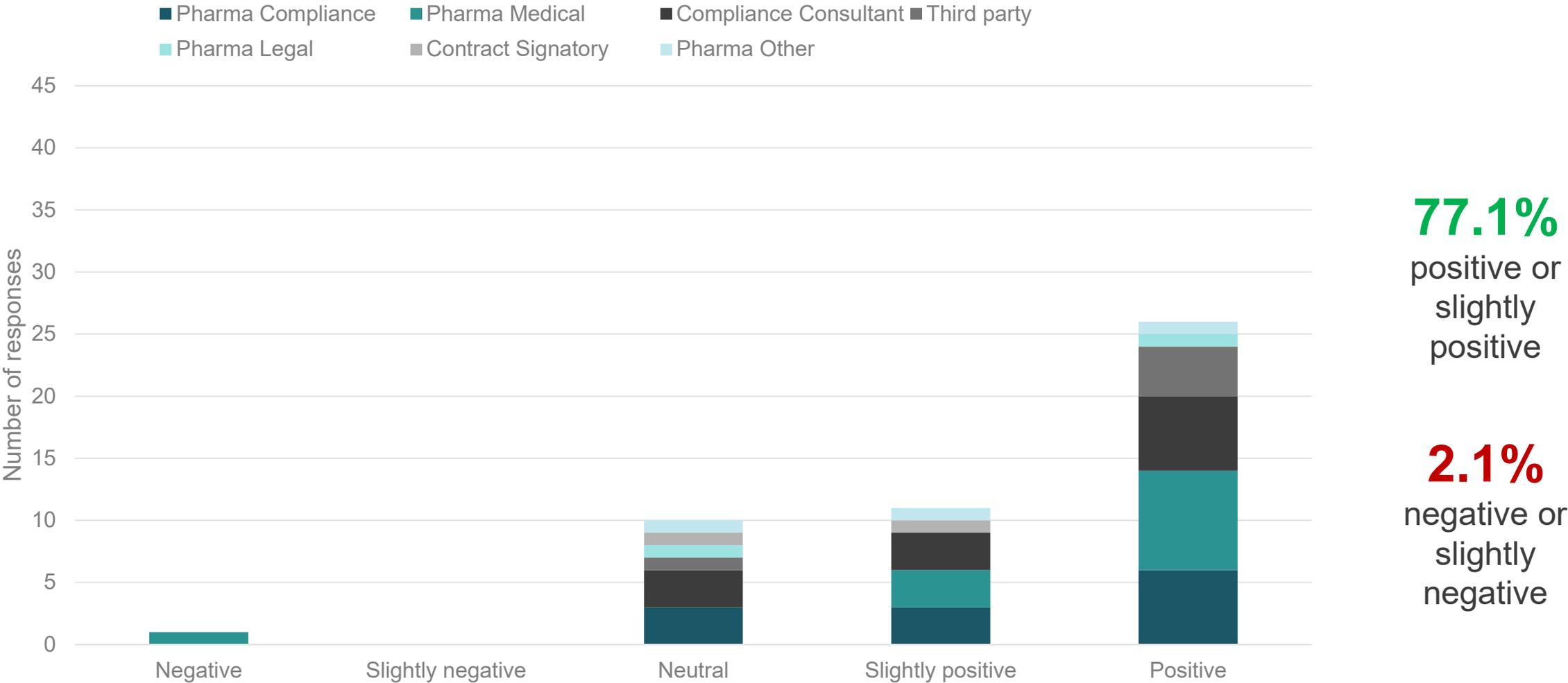
# How do you feel about... explanation of redactions?



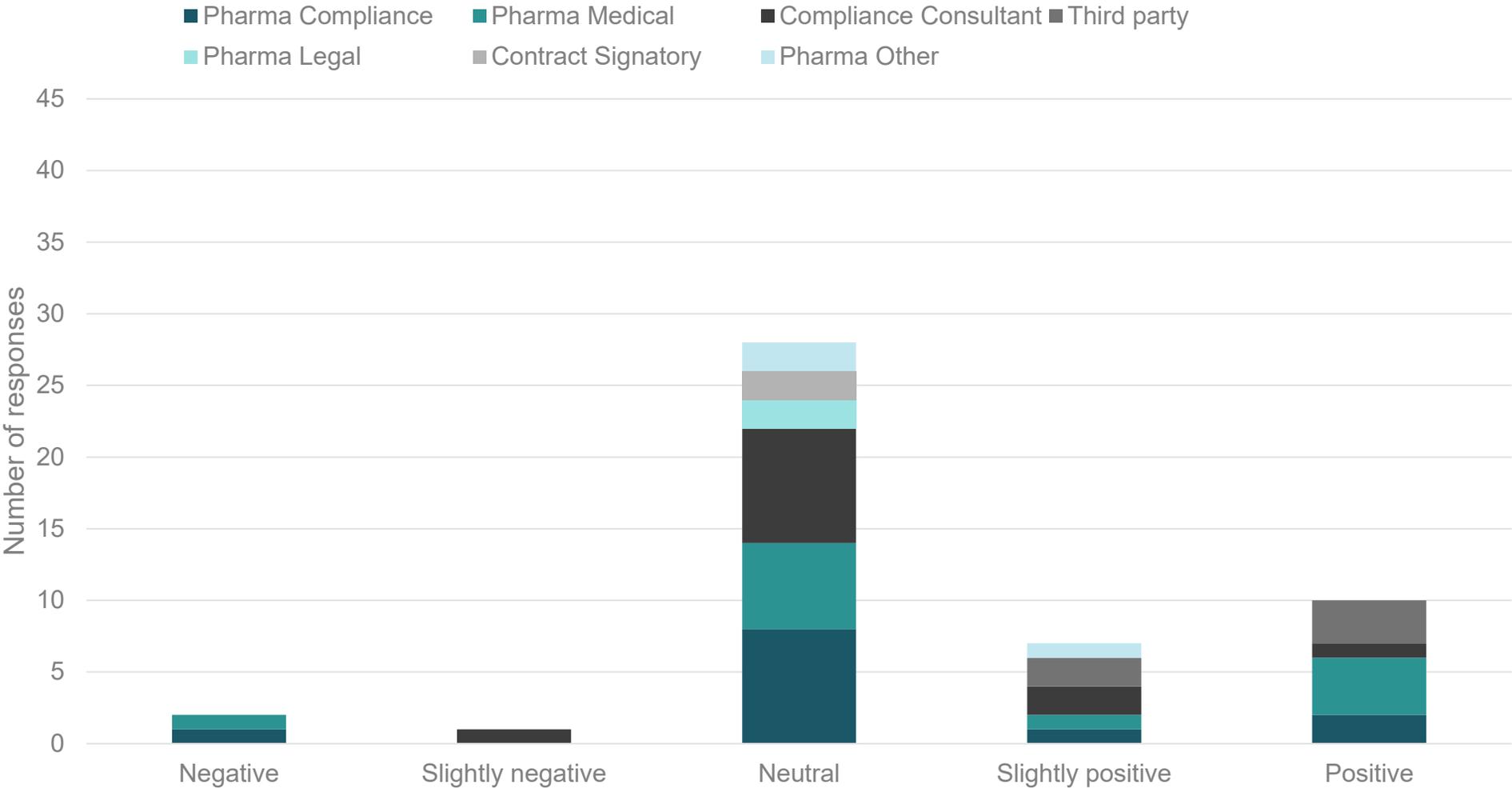
**72.9%**  
positive or slightly positive

**10.4%**  
negative or slightly negative

# How do you feel about... coloured headings?



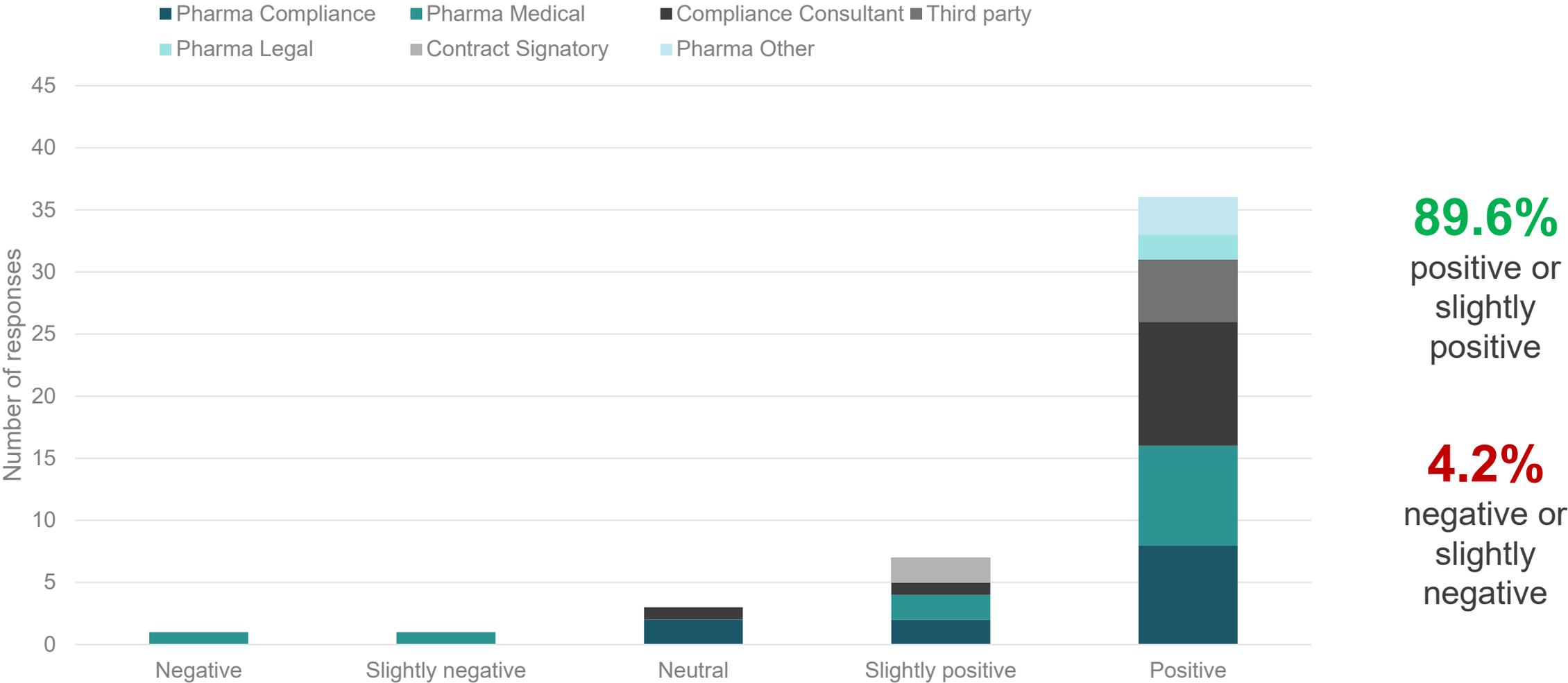
# How do you feel about... inclusion of PMCPA logo?



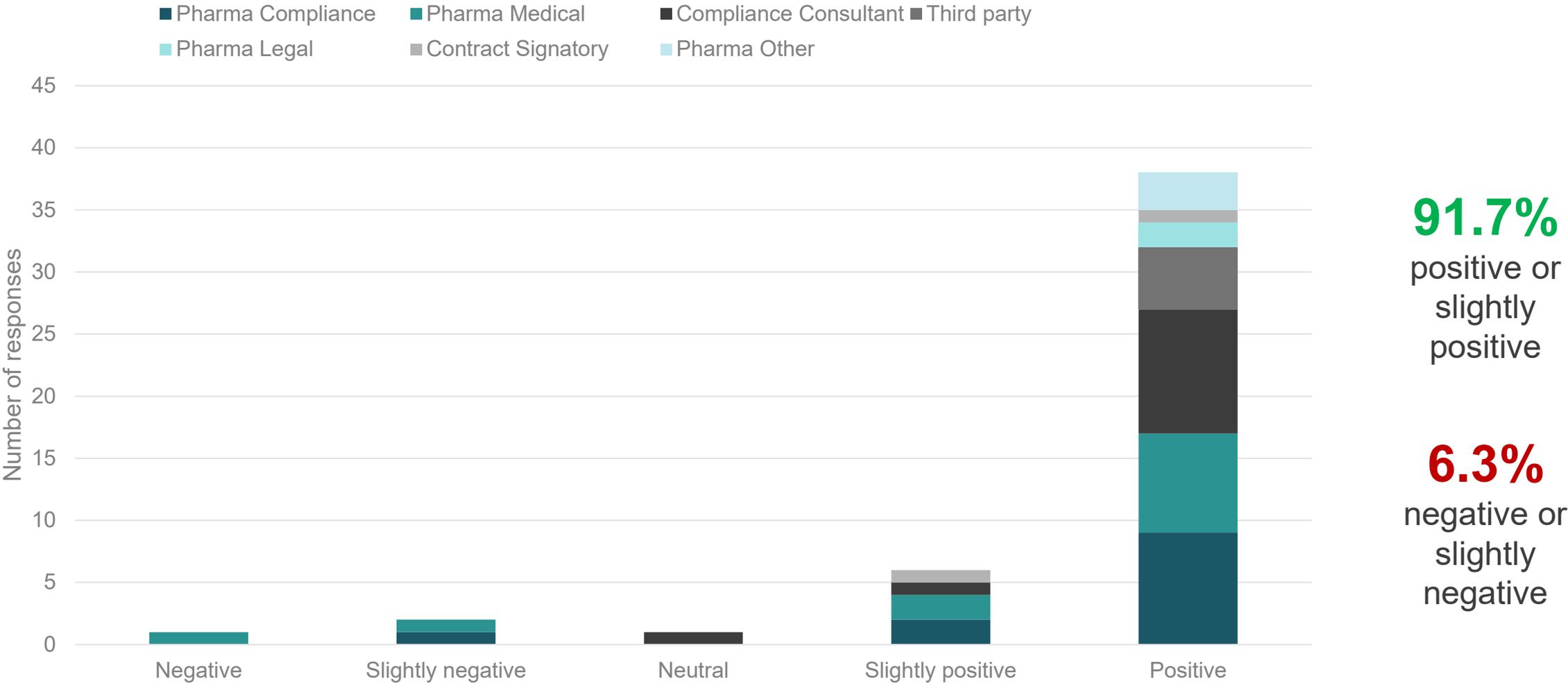
**35.4%**  
positive or slightly positive

**6.3%**  
negative or slightly negative

# How do you feel about... increased use of sub-headings?



# How do you feel about... increased use of bullet points?





## Thank you

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