Industry Sponsorship and Support

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1. Background

Financial support for education is a component of the interaction between healthcare professionals and industry. Such support provided to the Royal College of Physicians of Ireland (RCPI) can allow the hosting of high standard events with a recognised educational value. Members and Fellows of the College often attend external events, both national and international, with financial support from industry and these events allow physicians to keep their professional knowledge up to date from hearing of new innovations and the results from research. Members and Fellows also receive financial support for research projects which enable them to make improvements in patient care.

The pharmaceutical industry is a major contributor to financial support for healthcare professionals and organisations, but support is also received from companies in other industries, such as medical device companies. Within this document ‘industry support’ is understood to mean financial support from entities within the pharmaceutical industry, medical device companies and other for-profit companies. Such financial support benefits the healthcare system, and ultimately can improve patient care. Continued financial support from industry is recognised as important for future improvements and innovation in healthcare.

While there is an absolute need for doctors to remain up-to-date regarding international best practice, and to pursue research, there is potential for conflict of interest where financial and in-kind support is received from industry. Doctors must avoid being unduly influenced by industry in the care they provide to patients. They must retain the confidence of patients and they must act ethically and in the best interests of their patients at all times.

While the Medical Council has published guidelines on the interactions between registered medical doctors and industry, new regulatory measures mean that healthcare professionals and organisations will soon be asked to publicly declare support received from the pharmaceutical industry. From 2015, members of the Irish Pharmaceutical Healthcare Association (IPHA) will be required to declare the financial support provided to both healthcare professionals (HCP) and to healthcare organisations.

In addition, the establishment of the Charities Regulatory Authority will mean that charitable bodies, including the Royal College of Physicians of Ireland will come under increased regulatory scrutiny. It is thus important for the College’s public reputation to be ethical and transparent with respect to any interaction with industry. Adopting a proactive stance in this regard is both desirable and advisable.
2. Organisational Considerations for RCPI

As an organisation, the College and its Faculties and Institute receive industry support for educational activities such as, but not limited to, scientific meetings, public meetings, training programmes, awards and non-College fellowships, for example, the Pfizer Rheumatology Fellowship. The College will be seeking financial support from industry for the Pharmaceutical Medicine Training Programme in the form of an unrestricted educational grant.

The College, specifically No.6 Kildare St is also a conference venue and non-RCPI events are also held there. The purpose of No.6 Kildare Street is to provide state of the art conference and meeting room facilities for RCPI events and for external customers. The business generated through No.6 contributes in a significant way to the financial health of RCPI. For many, No 6 Kildare St is both the ceremonial and public face of RCPI and events held here, whether RCPI events or hosted by external customers, are associated with the name and reputation of the College.

Under its Strategic Plan (2014 - 2020), RCPI aims to position itself as the trusted and authoritative voice on health matters, and to build on a leadership role in public health and wellbeing. In recent years RCPI has built up a public reputation as a leading expert and impartial voice on major health priorities such as alcohol, smoking and obesity. RCPI events in No.6 Kildare St have supported this work.

However, a small number of recent events held in No.6 have led to the association of the RCPI name and brand with events that conflict with RCPI’s public health aims. For example, in October 2013, the UK based Institute for Economic Affairs (IEA) held an event entitled ‘How to really stop people smoking’. The IEA receives funding from the tobacco industry and is known as an advocate for lighter regulation of the tobacco industry. The event was booked through an external PR company. Also, in May 2014, O’Brien’s wines held their spring wine fair in No.6. Events such as this, given RCPI’s public stance on alcohol, have the potential to undermine RCPI’s message and to damage its reputation.

3. Considerations for Individual Members and Fellows

Under the IPHA code (1), individual Members and Fellows will be asked to give consent to having details of pharmaceutical industry support they receive published via an IPHA member website, or through some other public channel, e.g. an annual report. An RCPI discussion paper (2) on Industry Support for Continuing Professional Development published in March 2014 suggested that the RCPI might “ask Fellows to annually declare industry support for educational and research activities in parallel to the requirement of industry from 2015 onwards”. At a minimum, RCPI should inform and encourage Members and Fellows to comply with the IPHA code i.e. to give consent to having details of the financial support they have received from the pharmaceutical industry being published.

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1 Note: Faculty of Public Health Medicine does not currently accept industry support for its educational activities
4. Review of Policies/Guidelines of Other Organisations

Policies and guidelines on the interaction between healthcare professionals and industry tend to address the broad issues of transparency and maintaining professional independence. Policies and guidelines from a number of bodies/organisations are outlined below.

Medical Council Guidelines

The Medical Council in Ireland has published guidance on professional conduct and ethics which describe general principles on the interaction between registered medical doctors and industry (3,4). Included is advice to declare potential conflicts of interest relating to professional activities, including lectures, presentations, publications and research. The guidance also recommends that educational funding from commercial sources should be channelled through unrestricted education and development funds. Doctors are also advised not to accept gifts, including hospitality from commercial companies, although no definition of hospitality is included.

IPHA Code of Practice

In 2014 the IPHA developed an updated code of marketing practice (updated from a 2012 code) (1). The new IPHA code (Version 8) is aligned with the framework of EU Council Directive 2001/83/EC and the standards of the European Federation of Pharmaceutical Industries and Associations (EFPIA) 2013 code. The scope of the updated code has been expanded. Previously, it focused on marketing practice but now it also covers interactions with Health Care Professionals (HCP) and patient associations.

Under the code there is a disclosure obligation from 2015. Companies who are members of IPHA are required to document and publicly disclose all funding, direct or indirect, to individuals or healthcare organisations. The code is applicable to all members of the IPHA, i.e. over 50 companies, and all research-based pharmaceutical companies are members. Companies who are not members of IPHA, but are members of EFPIA are required to disclose in accordance with the EFPIA code.

The data collected in 2015 will be published in June 2016 and must be made publicly available (e.g. through company website, annual reports) and be easily accessible. The HCP will be asked to give consent in advance to publication of information of financial funding received. If an individual does not give consent, then information will be aggregated, i.e. "10 HCPs received €xxx in total". This differs from the Dutch system, where the names of those who do not give consent are published. However, it is possible for any HCP to withdraw consent to publish at any future date and without reason.

Categories of financial support that are included include donations and grants, services and consultancy fees and contributions towards the costs of hosting events. Items excluded are over the counter medicines, meals at or below a threshold of €80 per HCP and samples or items that are part of the ordinary course of sale and purchase. A ban on gifts is stipulated. Financial support received relating to research and development (such as to conduct research studies and clinical trials) will be aggregated.
Irish College of General Practitioners

In 2010 The Irish College of General Practitioner (ICGP) published a policy on sponsorship of activities and events (5). The policy specifies a number of principles for an activity or for any relationships between the ICGP and an organisation providing financial support. These principles are:

- Conformity with ICGP purpose
- Consistency with medical professionalism and ethics - reference is made to Medical Council guidance
- Independence of ICGP should not be compromised
- Consistency with ICGP Policy
- Avoidance of relationships with parties whose goals or activities directly conflict with the ICGP’s objectives, missions or vision.
- Transparency- sponsorships to be named and acknowledged.
- Compliance and accountability.

College of Psychiatrists of Ireland

In 2012, the College of Psychiatrists of Ireland approved a position paper (6) on the relationship between that College, and individual psychiatrists and the pharmaceutical industry. The paper again makes reference to Medical Council guidance.

The College of Psychiatrists adopts a stricter stance than many other professional organisations in relation to industry sponsorship. In 2010, the College Council passed a motion that the College would no longer accept sponsorship from pharmaceutical companies for its academic meetings or other activities. In addition, the 2012 position paper recommends the following:

- Psychiatrists and trainees should ensure that the educational content of CPD activities they attend is not influenced by pharmaceutical companies.
- Psychiatrists should only agree to participate in pharmaceutical company-sponsored meetings, if they are satisfied that the meetings have an entirely educational, rather than promotional purpose, and are sponsored through an unrestricted educational grant.
- The College will not accept any funding from the pharmaceutical industry for academic meetings, research, College competitions or awards, or any other College activities.
- Officers of the College are requested to declare any funding received from the pharmaceutical industry, and to provide any other relevant information regarding their dealings with industry.
- For academic psychiatrists engaged in research, there should be full declarations of any relationship. Furthermore psychiatrists participating in research should not receive personal payment for commercially funded work. They should also declare any conflicts of interest when presenting at meetings.
Royal College of Physicians Edinburgh

The Royal College of Physicians of Edinburgh has developed an Ethical Sponsorship Policy for education and other events (7). Under this policy, sponsoring companies play no part in planning the content of programmes or influencing the membership of event committees. The policy stipulates:

- The College will only enter into agreements or partnerships with those who are directly supportive of the College’s mission and aims.
- The College will review the activities of any organisation or individual offering financial support in excess of £30,000, before approving such sponsorship/donation.
- A register of all support will be maintained. Details of funds greater than £8,000 p.a. will be made available on request.
- Declarations of interest forms are required from council members, committee chairmen and conference chairs and speakers.
- The logo of the College may only be used by external partners, with the express permission of the College, and for the purposes for which it was requested.

Royal Australasian College of Physicians

The Royal Australasian College of Physicians has comprehensive guidelines for ethical relationships between physicians and industry (8) and has also published a position statement from the Paediatrics and Child Health Division for the funding of paediatric research by infant formula companies (9).

The guidelines on the relationship between physicians and industry are comprehensive and make recommendations for individual practitioners and professional societies. For professional organisations and societies, these include:

- All commercial support should be disclosed.
- Conflicts of interest should be declared by speakers at events.
- Outside funders of events should have no influence of over content, speakers etc.
- For individual practitioners:
  - Gifts from industry should be refused, including items of small value.
  - Hospitality may be acceptable where it is in connection with a professional educational meeting, but entertainment and any expenses for the provision of entertainment not connected with education should be declined.
  - Acceptance of drug samples is usually inappropriate.
  - Industry sponsorship to attend conferences and meetings should usually be restricted to those in which the professional is making a formal contribution. Then sponsorship should be untied, indirect and fully disclosed.
  - Any industry organised meetings attended should be scrutinised for bias or for incomplete information.
Royal Australian and New Zealand College of Psychiatrists

The 2003 guidelines from the Royal Australian and New Zealand College of Psychiatrists (10) address clinical trials, meeting support and attendance sponsorship, gifts and entertainment, drug samples, remuneration for services and conflicts of interest. It also advises that the relationship with pharmaceutical industry should be discussed within medical training programmes.

Specifically in relation to meeting support and attendance sponsorship, the guidelines state that:

- Where support is provided for scientific meetings, such support should not be contingent on alterations of the program, choice of speakers or other aspects. Acknowledgement should be given, with reference to the company logo, rather than by endorsement of a specific product.

- Sponsorship for formal meeting participation of an individual psychiatrist should ideally be between the organisers of the meeting and the pharmaceutical industry, and not with the individual. The sponsorship should be clearly linked to education and set at a reasonable level. Where a psychiatrist is sponsored by a company to attend a meeting where he or she is not making a formal contribution, the guidelines caution that this raises ‘the possibility that the individual could be compromised by a conflict of interest’.
5. Organisational Guidelines for RCPI

The guidelines are based on the principle that collaboration between industry and the Royal College of Physicians of Ireland has the potential to deliver significant benefits and that industry plays a valid and important role in the provision of medical education. However, this relationship needs to be based on clear ethical principles and should be transparent.

Support for Educational Activities

1. The College and its Faculties and Institute may solicit appropriate support from industry either through staff members or via the organising committee of an event.

2. If support received is from the pharmaceutical industry, the company should be a member of IPHA.

3. All financial support received from industry must be in the form of an unrestricted educational grant. Support received should not in any way influence the content of the event. The selection of speakers, chairs of sessions and topics must at all times remain under the control of the organising committee.

4. Any sponsorship accepted must be approved by the organising committee, Faculty/Institute Board, or Executive, depending on the purpose and event. In some cases, a sponsor may require signed agreement of terms and conditions/contract from the organizer. The organising committee must review and approve or reject these terms and they must be in alignment with RCPI guidelines.

5. Hospitality must be secondary to the main purpose of any meeting or event organised by RCPI with industry support.

6. For speakers and chairs, the preference is to present a gift in appreciation of their contribution to the event rather than honorarium payment. However, organising committees may exercise their good judgement in making honorarium payments for prominent international speakers.

7. Where a commercial company sponsors or organises a satellite event, or event run in tandem with an RCPI educational event, it should be made clear that this is a separate event funded by the company, and not by RCPI.

8. Financial support for awards, bursaries and fellowships will be made to RCPI on the understanding that RCPI has full autonomy and decision-making in respect of the award. This applies, for example to the RCPI Pfizer Rheumatology Fellowship.

9. For awards, bursaries and fellowships receiving financial support, joint press statements and photo calls are considered appropriate.

10. Support for training programmes such as the new training programme in Pharmaceutical Medicine is appropriate as it based on the provision of support in the form of an unrestricted educational grant. Development and design of the programme and selection of candidates for the training programme bursaries will be done independently, without input from those providing financial support.

11. Financial support from organisations or individuals may be refused where there is conflict with the mission or reputation of the College such as that relating to the tobacco or alcohol industry. Where there is doubt, the decision should be referred to the RCPI policy department for a final decision by the RCPI executive.

12. For events or initiatives where RCPI are collaborators but may not be the main organisers (for example Clinical Programmes collaboration with the HSE), RCPI should make the collaborators aware of these guidelines and in particular the overarching premise that any funds received should be unrestricted and that funders should not be in conflict with the mission or reputation of the College.
**Transparency and Declarations of Financial Support**

1. RCPI and its Faculties and Institute will publish details in their annual reports of all donations, grants and sponsorship received, with an indication of the educational value associated with that support.²

2. RCPI will comply with the IPHA code and will inform and encourage Members and Fellows to comply; for example through an article in the College Ezine with details of the changes.

3. All speakers making substantive contributions³ at events hosted by RCPI must include a slide on declaration of financial support received in the previous 12 months related/relevant to the topic of the event.⁴

4. The College will consider providing a facility for the declaration of funding received from industry, including that not included in the new IPHA guidelines, for Members and Fellows.⁵

**College Recognition of Industry Support**

1. Sponsors of events may be given space for exhibition stands, in an area completely separate from where the main presentations take place. Promotional material and logos can be displayed in this area. The organising committee of an event is free to adopt stricter rules in this regard, and may decide not to allow the any presence of any sponsor material at the event.

2. Sponsorship received for an educational event may be recognised by inclusion of a slide at the end of the event, and distinct from the educational presentation material of that event, listing the sponsors along with their logos. The remainder of the educational material presented should be free from any form of advertising including sponsor names or logos. This is a European Accreditation Council for Continuing Medical Education (EACCME) requirement.

3. Meeting materials for sponsored meetings, such as the programme of events, may carry logos and the branding of sponsors under a list of sponsors on the final page of a meeting booklet or equivalent.

4. Event marketing materials, including online materials may also carry logos and branding of sponsors, subject to certain conditions. In line with instructions from EACCME, logos and branding however may not appear on the home page or on the pages with scientific/educational information, and ideally should be placed under a separate tab dedicated to sponsors.

5. Where sponsors are recognised, it should be explicitly stated that the sponsorship has been provided by means of an unrestricted educational grant.

6. The sponsor may send representatives to the event and/or reception/dinner associated with the event.

**Maintaining Integrity of College Brand and Logo**

1. The College’s name and/or logo may be used by external partners only with express prior permission of the College and for the precise purposes requested.

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² A standard reporting format to be agreed.

³ Considered to be a contribution/presentation in excess of 10 mins duration.

⁴ Format of slide to be finalised. But following detail suggested 1) Donations, grants, research support, 2) Services, Honoraria, Consultancy, 3) Paid speaker 4) Major Shareholder 5) Other.

⁵ The college may also maintain a register of college-wide support received on sharepoint or similar, for internal reference.
6. Guidelines for Trainees, Members and Fellows

The following guidelines apply to all those who are Trainees, Members or Fellows of the Royal College of Physicians of Ireland. They are intended to support trainees, members and fellows in making decisions to maintain their professional independence in relation to financial support received from industry, and to ensure transparency in these relationships.

1. Individual Trainees, Members and Fellows should adhere to the Medical Council Guide on professional conduct and ethics in relation to their interaction with industry for educational or for research purposes, and should comply with the IPHA code of practice.

2. Gifts from industry should not be accepted.

3. Where an individual receives payment from industry for a service provided or work undertaken (for example research projects), they should satisfy themselves that they are able to present an unbiased professional view, without influence from the sponsoring company.

4. Medical professionals should not engage in endorsement of specific products or in advertisements, i.e. promotion of commercial interests under the guise of editorial comment.

5. Individual Trainees, Members and Fellows must satisfy themselves that any industry-sponsored meeting they attend has an entirely educational rather than promotional purpose.

6. Hospitality accepted must be secondary to the main purpose of any industry-sponsored meeting attended.

7. Sponsorship received to cover costs associated with attendance of an educational meeting must be untied and fully disclosed.

8. Industry-covered travel and subsistence costs associated with attendance of an educational meeting should be appropriate. Recipients should exercise good judgement on this when accepting sponsorship for attendance of such meetings.

9. It is only acceptable to receive an honorarium for an educational event where the individual makes a substantive contribution to the event, for example as a speaker. The speaker is expected to exercise good judgement in relation to the amount of this honorarium, and to accept an amount not in excess of the industry norm. The speaker should satisfy himself that A) the event is educational rather than promotional, B) the information they impart at the event represents their own independent, professional opinion and is not influenced directly or indirectly as a result of honorarium received, and C) the honorarium received is declared.

10. In public presentations, journal articles and equivalent, individual Trainees, Members and Fellows must declare potential conflicts of interest and any industry funding received.
7. Non-RCPI Events at No.6

These guidelines apply to non-RCPI events that take place at the conference venue of No. 6 Kildare St. The aim of these guidelines is to ensure that events held reflect College policies in relation to health and wellbeing.

1. Bookings for alcohol industry or tobacco industry supported events will be refused.
2. Booking for the following events will be referred to RCPI policy department for a recommendation to the executive based on content and context:
   - Food industry groups
   - Political groups
   - Diet industry (foods, drinks, products and services)
   - Nicotine replacement therapies - including e-cigarettes
   - Baby milk products
   - Other events where there may be a potential conflict, e.g. products with adverse environmental impact.
3. In the practical operation of any events taking place at No. 6, health and wellbeing priorities should be reflected as follows:
   - In line with principles of a smoke-free campus, smoking will not be allowed in the vicinity of any of RCPI's buildings, particularly No.6.
   - RCPI advocates the consumption of alcohol within healthy limits and any alcohol served at College events must reflect this.
   - Food choices for RCPI events must reflect a healthy eating ethos and offer healthy options on all menus.
References

6. College of Psychiatrists of Ireland. The relationship between psychiatrists, College of Psychiatrists of Ireland and the pharmaceutical industry. December 2012