

Pharmaceutical Industry Sponsorship Policy

1. Purpose

This policy sets out AFAO's arrangements for agreements and sponsorships with the pharmaceutical industry.

2. Responsibilities

All staff and volunteers are required to comply with this policy.

3. Application of policy

This policy applies fully to all of AFAO's operations, including its international activities and the AFAO Foundation. References in this policy to AFAO include the AFAO Foundation.

Where this policy is contradicted by contractual obligations to funders, the contractual obligations must be adhered to. Exceptions to such obligations should be sought from funders prior to entering into contracts and any substantive areas of difference must be drawn to the attention of the Chief Executive Officer.

4. Context

Historically, community organisations in Australia facing the challenges of responding to HIV/AIDS have done so partially or fully funded through grants from the Australian and/or State and Territory Governments, with supplementary funding from various sources including philanthropic funds and the pharmaceutical industry.

Community HIV organisations have complex relationships with the pharmaceutical industry. The development of effective drugs to treat HIV has transformed the experience and life expectancy of people living with HIV. Pricing and trade policies regarding particular pharmaceutical products, however, have restricted the access of people with HIV both inside and more frequently outside Australia to essential medicines in a manner that is highly unethical. AFAO as an HIV community organisation pays close attention to the research and development activities of pharmaceutical companies, but in no way endorses any action that limits the access of people with HIV or other potentially life-threatening conditions to essential medicines.

Accordingly, AFAO accepts funds from the pharmaceutical industry for educational and program purposes only, and the terms, conditions, and purposes of such grants are documented by a signed agreement. Signed agreements between the corporate supporter and AFAO state in writing that the financial support will not in any way impact the content of AFAO's publications or programs, and that health issues and policies, including those related to the specific corporation or industry, will be addressed by AFAO without intervention by the corporate supporter.

Policy number: 019

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Approved by: AFAO Chief Executive Officer

AFAO is solely responsible for the content, quality, scientific integrity, identification of needs, determination of educational objectives and materials related to any program or social event sponsored by a commercial source. All AFAO programs are free of commercial influence in planning and content. Commercial support is acknowledged in printed materials produced with pharmaceutical sponsorship however, AFAO does not endorse or promote a specific product, agency or corporate brand.

5. AFAO Policy

In accepting pharmaceutical company sponsorship, AFAO requires that certain conditions be met. Only if all the conditions set out below are met will AFAO accept pharmaceutical company sponsorship. These are the guiding principles for pharmaceutical company sponsorship of community based initiatives.

5.1. Relationship between pharmaceutical company sponsorship and government funding

AFAO will seek or accept an offer of drug company sponsorship for a crucial/key program or project only if:

- government funding has been refused or is unlikely
- government funding is inadequate, or
- government funding would take too long to obtain.

5.2. Conceptualisation, then funding

Decisions to seek and accept pharmaceutical company sponsorship should be made on a case by case assessment, with the strategic value of the activity to be funded carefully assessed. Negotiations should only be entered into with pharmaceutical companies where projects are fully conceptualised or pre-project assessment has been completed. Negotiations will only be undertaken following approval by AFAO's Chief Executive Officer.

5.3. Contracts

Where a decision is made to accept funds from a pharmaceutical company, it should be made clear to the donor (as part of the contract) that the funds are accepted on the basis that the donor will have no input into the production of a publication or management/direction of a project or management/direction of a staff position. The same principles of independence and autonomy that shape project funds also relate to contractors/consultants engaged using pharmaceutical company money. In other words, pharmaceutical industry funding will always be in the form of 'unrestricted' grants.

5.4. Sponsorships for ad hoc activities such as conferences, meetings and round-table discussions

AFAO will usually avoid any pharmaceutical sponsorship of activities where such sponsorship could be seen to influence AFAO's position. For example, if AFAO is engaged in advocacy around access to or pricing of a particular drug, accepting pharmaceutical funding for such an activity or associated costs such as travel may be seen to compromise AFAO's independence.

In instances where pharmaceutical companies offer to sponsor attendance at an international conference for AFAO delegate/s, decisions about whether to accept funding will be made by the Chief Executive Officer. In the event that the offer is accepted, funded delegates will be selected through independent AFAO processes, and no AFAO delegate will support or publicise any particular drug, regimen or product as a result of such sponsorship.

5.5. Code of conduct

To ensure that any employees who have direct dealings with representatives from the pharmaceutical industry engage in business-like and transparent relationships at all times, and do not gain directly or indirectly from their interactions, the code of conduct, below, will be adhered to. Adherence to this code of conduct will be monitored by the AFAO Chief Executive Officer:

- invitations to participate in pharmaceutical industry sponsored events which are issued to individual employees must be ratified by the AFAO Chief Executive Officer prior to acceptance
- employees attending individual information sessions must conduct themselves in an appropriate manner and report back
- AFAO will adopt a practice of full disclosure, including placing information regarding pharma-funded projects on AFAO's website and in its Annual Report
- AFAO may also decide to limit or halt pharma funding during times where sensitive negotiations and advocacy activities would compromise AFAO's perceived and/or actual independence
- AFAO will discuss this policy with its members and other partners with a view to developing a consistent policy approach across the HIV sector
- lodgings and per diem payments paid for by pharmaceutical companies will be generally consistent with the standards of AFAO
- information supplied by drug companies must be checked with an independent expert prior to publication in any form
- expenses for attending pharma-sponsored conferences must be paid by AFAO
- any interaction between an employee and the sponsoring company will be subject to scrutiny by AFAO management.

5.6. Acknowledgment and transparency

Where a project or publication is undertaken through full or partial funding from the pharmaceutical industry, this must always be publicly acknowledged. In the case of a publication, this should be done by including the words "this publication is supported/made possible by an unrestricted grant from <insert name of pharma company>."

5.7. Editorial Influence

Pharmaceutical company sponsorship of AFAO publications or media must be free of any editorial influence.

5.8. Comment and critique

AFAO will clearly state when negotiating drug company sponsorship that in accepting sponsorship, there can be no impact on the organisation's ability to voice criticism of particular HIV drugs and/or their manufacturers. Pharmaceutical company funding will not compromise decisions to be critical of pharmaceutical companies and/or their products, and particularly of company attitudes to providing compassionate access to drugs, in its policy, advocacy, media comment, social media, website and in *HIV Australia*.

5.9. Accepting Gifts and Gratuities

Gifts and gratuities offered by pharmaceutical companies are not accepted.

5.10. Review

Ongoing review and evaluation of pharmaceutical drug company sponsored projects and programs will be undertaken. The continuation of any pharmaceutical company sponsored projects should be based on favourable review and evaluation.

5.11. Compliance

In the event that any staff member or AFAO activity receives funding in a manner that contravenes this policy, such money will be refunded, disciplinary action taken, and disclosure made on the website.