

Pharmaceutical Industry Sponsorship Policy

Policy no: 019

Version 1

Approved on: 25 October 2018

Approved by: Health Equity Matters CEO

1. Purpose

This policy sets out Health Equity Matters' arrangements for agreements and sponsorships with the pharmaceutical industry.

2. Scope

This policy applies to Health Equity Matters' engagement with the pharmaceutical industry across its operations, including in its Australian and international activities. It applies to all Health Equity Matters Personnel, including Board and Committee members, staff employed in Australia and by the AFAO Foundation, volunteers, contractors and consultants.

3. 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 in Australia and internationally 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. Health Equity Matters 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, Health Equity Matters 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 Health Equity Matters state in writing that the financial support will not in any way impact the content of Health Equity Matters' publications or programs, and that health issues and policies, including those related to the specific corporation or industry, will be addressed by Health Equity Matters without intervention by the corporate supporter.

Health Equity Matters 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 Health Equity Matters programs are free of commercial influence in planning and content. Commercial support is acknowledged in

printed materials produced with pharmaceutical sponsorship however, Health Equity Matters does not endorse or promote a specific product, agency or corporate brand.

4. Policy Statement

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

4.1 Relationship between Pharmaceutical Company Sponsorship and Government Funding

Health Equity Matters 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.

4.2 Assessment and Approval

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 Health Equity Matters' CEO.

4.3 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.

4.4 Sponsorships for Ad Hoc Activities Such as Conferences and Meetings

Health Equity Matters will usually avoid any pharmaceutical sponsorship of activities where such sponsorship could be seen to influence Health Equity Matters' position. For example, if Health Equity Matters 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 Health Equity Matters' independence.

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

4.5 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, outlined below, will be adhered to, and adherence monitored by the Health Equity Matters CEO:

- invitations to participate in pharmaceutical industry sponsored events which are issued to individual employees must be ratified by the Health Equity Matters CEO prior to acceptance;
- employees attending individual information sessions must conduct themselves in an appropriate manner and report back;
- Health Equity Matters will adopt a practice of full disclosure, including placing information regarding pharma-funded projects on Health Equity Matters' website and in its Annual Report;
- Health Equity Matters may also decide to limit or halt pharmaceutical funding during times where sensitive negotiations and advocacy activities would compromise Health Equity Matters perceived and/or actual independence;
- Health Equity Matters 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 Health Equity Matters;
- 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 Health Equity Matters; and
- any interaction between an employee and the sponsoring company will be subject to scrutiny by Health Equity Matters management.

4.6 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>."

4.7 Editorial Influence

Pharmaceutical company sponsorship of Health Equity Matters publications or media must be free of any editorial influence.

4.8 Comment and Critique

Health Equity Matters 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.

4.9 Accepting Gifts and Gratuities

Gifts and gratuities offered by pharmaceutical companies are not accepted.

4.10 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.

4.11 Compliance

In the event that any member of Health Equity Matters personnel or activity receives funding in a manner that contravenes this policy, that money will be refunded, disciplinary action taken, and disclosure made on the website.

5. Roles and Responsibilities

Who	Responsibility
Board	<ul style="list-style-type: none"> Reinforce Health Equity Matters commitment to working in partnership with the pharmaceutical industry in line with agreed protocols and where that will advance the organisation's vision and purpose, while protecting organisational sovereignty. Approve updates to this policy.
CEO	<ul style="list-style-type: none"> Ensure the application of the policy across Health Equity Matters Australian and international operations

6. Related Policies and Documents

Policy	Title and Hyperlink
029	Partnership Policy
037	Risk Management Policy

7. Policy History

Date of update	Version	Key changes	Endorsed by	Approved by	Next review
25 October 2018	1	Establishment of inaugural policy to support positive benefits from pharmaceutical industry while mitigating associated risks	Quality Principal	CEO	October 2020