

Policy Direction - Receiving Financial Support from the Pharmaceutical Industry and Medically-Related Products Industry

Rationale and Relationship to Mission, Principles and Values

Pancreatic Cancer Canada Foundation (PCCF) has nurtured a mutually beneficial relationship with the corporate sector for many years. With the ongoing development of more drugs to treat pancreatic cancer, pharmaceutical companies have been asked to or have offered to support various PCCF programs and initiatives. Support may be in the form of direct donations and/or information about a company's product and/or disease management program and/or monetary support for educational programs, conferences, publications, fundraising events and research projects.

Allowing the healthcare-related industry (including pharmaceutical companies that produce chemotherapeutic drugs and those who do not, manufacturers and/or distributors of therapeutic devices and of non-prescription health care products, such as vitamins and dietary supplements) to support PCCF, can aid in fulfilling the mission of the organization. Such funds can be essential in the support of programs and research that PCCF wishes to conduct, but cannot support out of current funding. By accepting these funds, PCCF is better able to support the pancreatic cancer community, while also gaining the benefit of being associated with a company working in oncology.

Pharmaceutical companies support voluntary health agencies for several reasons: to enhance patient and professional education programs and research under the auspices of an organization that serves the needs of individuals concerned with given diseases; and to provide a means of increasing corporate visibility outside of the normal marketing or advertising channels. In most cases, companies will support a voluntary health agency's programs if their own corporate Research & Development strategy is focused on development of agents for treating the disease(s) that are of concern to the agency. In other cases, support will be provided because of the alignment of organizational values or to increase visibility by being associated with a credible organization.

The main risks to PCCF of accepting support from such companies are that PCCF may be perceived as endorsing a company's product(s) and/or be perceived by clients, physicians and/or news media as a 'salesman' for the product(s). A specific concern relating to support from companies manufacturing and/or distributing therapies that endeavor to modify the course of the disease or treat specific symptoms relates to the

introduction of these drugs as new treatments: By soliciting and accepting support from the companies, it may create the perception that funds provided to PCCF for education programs and research are contributing to the price of the drug or projected availability.

Procedures can be put in place to allow for the acceptance of support for educational programs, research and fundraising events without such perceptions arising. This policy provides the framework under which PCCF can accept funds that are provided without restrictions and with PCCF maintaining control over program content and delivery.

Policy Objective

This policy reflects the view that the positive aspects of accepting program and research funds from pharmaceutical companies outweigh the negative aspects. This policy provides detailed procedures to be followed when undertaking projects and programs funded by pharmaceutical and medically-related products. The procedures will ensure that activities related to such projects and programs are compatible with the mission of PCCF and meet ethical and social responsibilities.

PCCF considers this policy to apply to the relationship between it and pharmaceutical companies, manufacturers and/or distributors of therapeutic devices and of non-prescription health care products, such as vitamins and dietary supplements.

Policy Application

This policy applies to volunteers and staff at all levels of the organization (national office, regional and local representation).

Policy Details

Effective upon approval, PCCF at all levels (national office, regional and local representation) are permitted to accept funds from pharmaceutical and medically-related companies provided that the clearance procedures in the Corporate Solicitation Policy are adhered to and the procedures below are followed.

Overall Procedures

1. PCCF staff should seek financial support broadly from all relevant pharmaceutical and medically-related companies. While it is permitted to designate particular projects or programs to particular companies, it is not allowable to have a

single, exclusive financial support partnership with one company for all projects and programs.

2. A written agreement between the supporting company and PCCF must be developed recognizing the autonomy and independence of PCCF and its activities separate from any influence of the supporting company. This agreement must stipulate that the supported program serves a scientific, educational or client-benefit purpose and is not for promoting/prioritizing any product.
3. This written agreement should include a statement that funds from a pharmaceutical company must be made payable to Pancreatic Cancer Canada Foundation. Acceptance of unrestricted funds by PCCF should in no way be considered as an endorsement of any drugs or products manufactured or distributed by the contributing company. (See Appendix B re additional guidelines and the use of PCCF corporate mark).
4. It is permissible for PCCF-initiated research projects to receive funding from pharmaceutical companies. The research projects must adhere to the usual PCCF process for accessing and approving a research project including being ethically defensible, socially responsible and scientifically valid.
5. It is permissible for PCCF to participate in pharmaceutical company-initiated research projects following review and approval by the PCCF's Executive Director and board.
6. The pharmaceutical company must not influence the presentation of information by PCCF about its product or otherwise use the presentation as an advertising vehicle for its own use. PCCF will rely on documented scientific evidence and the advice of knowledgeable medical practitioners in presenting such information. PCCF will acknowledge support of sponsoring companies as stated in number eight (8) below.
7. PCCF staff and advisors are solely responsible for the identification of needs, determination of objectives, selection of content and speakers (where such are used), educational methods and materials. Whenever possible, speakers should use generic names of products rather than trade names during educational programs.
8. Acknowledgement of financial support by sponsoring companies must be made for all supported programs and research. However, references must not be made to specific products but only to the corporate name.
9. PCCF volunteers and staff must not accept gifts and/or honoraria for personal use from the pharmaceutical industry. This includes payment of an honorarium for speaking at a company-hosted meeting or conference; if honoraria are provided to all speakers, those to PCCF volunteers and staff should be payable to Pancreatic Cancer Canada Foundation. It is permissible to be reimbursed for expenses related to company-sponsored meetings or conferences.
10. PCCF volunteers and staff must not wear or use articles bearing pharmaceutical or medically-related company names, logos or other insignia. This includes items of clothing, pens, notepaper, binders, etc.
11. It is recognized that medical personnel have roles with PCCF and other professional duties. While acting as PCCF volunteers, medical personnel must abide by this policy and its procedures.

Specific Procedures

Educational Programs

Frequently, financial support is solicited or offered in support of PCCF related educational programs which are developed for patients with pancreatic cancer, family members, caregivers or healthcare professionals. When such support is received the following must be adhered to:

1. Any monetary support must be provided in the form of an unrestricted educational grant. This means that while the company may make suggestions, it cannot determine program content, budget, selection of speakers or support material. It is acceptable for the funding source to restrict donated funds to certain elements of a program, e.g. speaker costs, travel, refreshments or materials.
2. Speakers must be informed in advance of the requirement for a balanced presentation about the range of therapies. Speakers must present all current and new information, provide accurate and unbiased information and have the ability to answer questions about all therapies clearly and objectively.
3. A company sales representative may not be a speaker at an educational session because of the requirement that information presented must be balanced and unbiased.
4. Wherever possible, sponsorship should be obtained from more than one company to avoid the perception of undue influence or favoritism.
5. The explicit disclosure of the nature and extent of the support for the program and/or speakers should be made public at the meeting. Speakers should also disclose to the audience any relevant financial relationships they may have with sponsoring companies.

Educational Materials

Designated educational materials such as booklets, brochures, leaflets, newsletters, posters, videos, etc., may be written and produced with the assistance of an unrestricted educational grant from a pharmaceutical or medically related company. Educational materials which are not eligible for such grants are specified below. As with educational programs, this means that while the company may make suggestions, it cannot determine content, budget, selection of writers or illustrators. It is acceptable for the funding source to restrict donated funds to particular material(s).

The company should be acknowledged in the produced material(s). (See Appendix A for examples of acceptable credit lines and disclaimers).

The educational materials listed below are not eligible for funding through an unrestricted educational grant from a pharmaceutical or medically related company. The intent of this prohibition is to ensure that there is no possible perception of external influence on the content of these fundamental PCCF publications.

- annual reports
- general information brochures about Pancreatic Cancer Canada
- general patient support brochures, e.g., brochure describing support programs available to pancreatic cancer patients and their families

Sponsorship of Pancreatic Cancer Canada Foundation Events and Other Fundraising Activities

It is in the best interests of PCCF to apply standard corporate sponsorship policies and guidelines to pharmaceutical and medically-linked companies. Written agreements/contracts must be developed specifically defining sponsor benefits as narrowly as possible, including merchandising rights, public relations/personal appearances, and future options.

Acknowledgment of sponsorship support can be made only to the corporate name not to the specific product.

Confidentiality

It is the responsibility of PCCF to maintain the confidentiality of people diagnosed with pancreatic cancer. PCCF staff and volunteers are not allowed to provide company representatives with names of people who have pancreatic cancer or their family members. Mailing lists are not to be provided or shared with any external sources. Results of participant evaluations of educational programs can be provided only as compiled, anonymous summaries. Participants attending programs may choose to sign a company mailing list, but if this action takes place at a PCCF sponsored program, it must be made clear in advance that this is a personal decision and not associated with PCCF.

Pharmaceutical Company Displays and Materials

In Canada, pharmaceutical companies are not allowed, by law, to advertise prescription drugs directly to consumers. Therefore, pharmaceutical companies cannot set up a display booth to promote the company's prescription drugs at any PCCF organized program or event. The company can act as a sponsor and be offered the opportunity to be recognized in meeting programs, on signs and through oral acknowledgement. Only the name of the company can be used, not the product.

- It is acceptable to have available at a workshop or educational session, company brochures or other hand-outs providing the information is restricted to describing the company's information or product support telephone lines and web sites. Such materials can be made available to individuals who wish to have them (for example, placed on a table in the room), but should not be distributed to each participant. It is not acceptable for the company to attempt to sell their drug product at a workshop or educational session.

- The direct participation of company information and product support telephone line staff at a workshop or educational session is discouraged. If they are invited to attend, they should not present information, but only answer direct questions.

Therapeutic devices and non-prescription health care products can be promoted to the general public as long as they do not claim to treat or cure a disease or condition. Therefore, display booths for such products/equipment can be set up at PCCF programs or events and can be acknowledged in meeting programs, on signs and through oral acknowledgement.

Executive Champion

The Executive Director is the Executive Champion of the 'Policy on Receiving Financial Support from the Pharmaceutical Industry and Medically-Related Products Industry'.

Monitoring and Compliance

The Director, Strategic Partnerships, in conjunction with the Director, Marketing and Communications, are responsible for annually reviewing and reporting to the Executive Director, outcomes in terms of compliance to the Pharmaceutical Policy. They will also provide guidance, on an ongoing basis as required, on appropriate agreements and/or ethical issues.

Related Policies, Legislation

PCCF has reviewed related policies developed by other health charities and believes this policy is similar to and/or superior to those related policies in allowing PCCF to meet its ethical and social responsibilities. The government of Canada has approved legislation and regulations that specify what types of direct-to-consumer advertising are permitted. Some pharmaceutical companies are members of professional organizations that require members to abide by rules governing relationships with consumer and voluntary organizations and health charities.

Policy Review

The policy is to be reviewed every five years or more frequently, if necessary.

Appendix A

Use of Pancreatic Cancer Canada Foundation corporate mark (logo) with commercial products

To overcome any perception of endorsement, any action to use the Pancreatic Cancer Canada Foundation corporate mark (logo) in relation with a particular company must be reviewed and approved by the Director of the relevant department and follow these procedures:

1. PCCF and the company shall ensure that all advertising is balanced, accurate and fair.
2. Use of the PCCF corporate mark (logo) is not to be construed as an endorsement of the company and/or its product(s). A disclaimer should be used clearly stating this fact (see Appendix B for wording).
3. PCCF cannot permit its corporate mark (logo) to be used in conjunction with claims of product superiority.
4. Advertisements, whether within PCCF publications or external publications must clearly and conspicuously disclose if the company has paid for the use of PCCF's name or corporate mark (logo) (see Appendix B for wording).
5. PCCF may enter into licensing agreements with a company, including a pharmaceutical company, for the use of its corporate mark (logo) with the explicit approval of the Executive Team (Executive Director, Directors).

Appendix B

Credit Lines and Disclaimers

The following are examples of acceptable credit lines:

For PCCF originated and printed material:

Publication of this (booklet) (pamphlet) was made possible by an unrestricted educational grant from the XYZ company. (Company logo can be used).

For PCCF produced audio-visual material:

Produced by Pancreatic Cancer Canada Foundation, supported by an unrestricted educational grant from the XYZ company. (Company logo may be used).

If PCCF is involved in the preparation of material about pancreatic cancer for a company, PCCF's assistance can be acknowledged. However, the content should not include product identification:

Prepared with technical assistance from Pancreatic Cancer Canada Foundation.

In addition to the credit line, a disclaimer is also required on publications and other materials. The following are examples of acceptable disclaimers

Acceptance of this unrestricted educational grant by Pancreatic Cancer Canada Foundation (PCCF) does not constitute endorsement by PCCF of any product(s) of XYZ Company. Pancreatic Cancer Canada Foundation does not approve, endorse or recommend any specific product or therapy but provides information to assist individuals in making their own decisions.

Pancreatic Cancer Canada Foundation is an independent, voluntary health agency and does not approve, endorse or recommend any specific product or therapy but provides information to assist individuals in making their own decisions.