

Policy and Procedure

Title:	Industry Relationships	
Policy Number:	01.014	Section: Administration (Leadership)
Effective Date:	February 10, 2006	
Revised Date:	November 12, 2019	
Approving Body:	President and CEO	
Authority:	CancerCare Manitoba Act	
Responsible Officer:	President and CEO	
Delegate:	Chief of Clinical Operations	
Contact:	CCO Office	
Applicable to:	All CCMB Staff and Physicians	

1.0 BACKGROUND:

- 1.1 Appropriate and transparent relationships between Industry and CancerCare Manitoba (CCMB) Staff are crucial to both benefit and protect the patients or community served by CCMB.
- 1.2 It is recognized that there are many beneficial outcomes resulting from positive relationships, e.g. advancing scientific knowledge about cancer, support for educational opportunities and possible reduction in costs; however the right to confidentiality of patient and corporate information must be respected. As well, it is critical that clinical decision-making, education and research activities be free from influence or perceived influence created by improper relationships or interactions between CCMB staff and Industry.

2.0 PURPOSE:

- 2.1 To provide staff with parameters for dealing with Industry, where the fundamental principles of ethics, of professional practice and the obligations by law under the Personal Health Information Act of Manitoba (PHIA) can be preserved.

3.0 DEFINITIONS:

- 3.1 **Industry:** Any vendor seeking to do or doing business with CCMB. This includes pharmaceutical companies, manufacturers or suppliers of medical devices, and manufacturers or suppliers of medical or non-medical products or services.
- 3.2 **CCMB Staff:** All persons employed or contracted by or affiliated with CCMB, including staff, physicians, board members, volunteers and students / trainees.
- 3.3 **Educational Rounds:** Meetings held with the purpose of educating medical or other staff, where clinical care and personal health information details may be discussed. Patient identifying information is removed or obscured wherever possible to comply with PHIA.
- 3.4 **Gifts:** Items of any value that are given by Industry that does or seeks to do business with CCMB to either CCMB Staff or his/her immediate family, and for which the recipient neither paid nor provided services. These include, but are not

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limited to, items such as pens, notepads, textbooks, electronic media, meals, gift certificates, tickets, devices, products or services, travel, hotel accommodations, entertainment or payments for attending a meeting.

3.5 **Industry Support:** the provision of support by Industry to CCMB in the form of funds, goods, or services provided in kind for the purpose of education, training, quality improvement, research and other initiatives being sponsored by CCMB.

3.6 **Conflict of Interest:** A situation in which the private interests (financial or personal) of a CCMB Staff member compromises, or has the appearance of compromising, or has the potential to compromise the CCMB Staff member's independence and objectivity of judgment in the performance of their obligations to CCMB.

4.0 **POLICY:**

4.1 Industry representatives are not allowed to participate directly in any research, educational or clinical activity at CCMB where patient identifying information linked to personal health information may be disclosed.

4.2 Industry representatives are not allowed to be present for any discussions of CCMB business issues and/or patient management issues where their presence may be construed as influencing decisions made.

4.3 CCMB Staff will not accept Gifts from Industry representatives regardless of the nature or value of the Gift.

4.4 Industry Support for education, training, quality improvement, research or any other CCMB initiative is acceptable, where there is no obligation or commitment in return, and must be approved through the office of the appropriate senior executive member.

5.0 **PROCEDURE:**

5.1 Reasonable support from Industry for educational activities is acceptable, where there is no obligation or commitment in return. Support may be in the form of sponsorship for meals or to cover costs of speakers. All donations and resulting expenses must be documented and reviewed by the appropriate senior executive team member. Acknowledgement of donations on programs or advertising for an educational activity is acceptable.

5.2 Generic donations for educational purposes are acceptable, and must be in the form of an unrestricted educational grant payable to CCMB.

5.3 Requests from Industry representatives for educational opportunities that include attendance at a clinical patient visit or procedure, or review of specific personal health information are to be denied. Requests for educational opportunities that do not include the above are acceptable, provided that any remuneration or donation

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given in return holds no obligation or restriction for CCMB physicians or staff.

Note: This does not include training on medical devices already purchased (e.g. surgical instruments or radiation devices) where training **must** occur during actual patient procedures. In these situations, the Industry trainer must view CCMB PHIA policies regarding confidentiality of patient information, read the PHIA Information Sheet and sign the Visitors on Business Pledge of Confidentiality.

Appropriate consent by the patient or a person authorized to act on behalf of the patient shall be obtained beforehand if an industry representative is present during patient care interactions.

- 5.4 Meetings between Industry representatives and CCMB physicians or staff must be arranged through appropriately booked appointments and scheduled in a non-clinical area such as a private office or meeting room. Meetings with non-physician direct care staff must be arranged through the appropriate department / program director. In cases where the office space is in a clinical area or where access to personal health information is possible, the Industry Representative must view CCMB PHIA policies regarding confidentiality of patient information, read the PHIA Information Sheet and sign the Visitors on Business Pledge of Confidentiality.
- 5.5 Distribution of Samples, Promotional Materials, Patient Education Materials and Product Review Processes:
- 5.5.1 Drug samples – are only acceptable if they are part of an existing approved regimen for CCMB patients and are received by, dispensed from and documented in the patient electronic health record by CCMB's Pharmacy Department.
- 5.5.2 Non-drug samples – may only be distributed by CCMB Staff if they are part of an existing approved care program for CCMB patients (e.g. Nutrition Services providing options of nutritional supplements to provide choices and establish product tolerance prior to purchase), or are part of a sample assessment process as approved by the appropriate department / program director.
- 5.5.3 Marketing or promotional or educational materials – are only acceptable for distribution to patients if they are educational in nature and no other generic material exists. Patient educational materials which are produced and/or funded by Industry, but contain no mention of a product, may be made available or distributed to patients, family and staff. Promotional materials or displays for CCMB Staff educational sessions or events are acceptable as long as they are not displayed within the same room as the educational activity.
- 5.5.4 Medical device “free trials” – are only acceptable if they are under review during a purchase process as approved by the appropriate department / program director.
- 5.5.5 Marketing presentations – are only acceptable as part of a purchase

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process as approved by the appropriate department / program director. Notices to CCMB Staff regarding these presentations must be clear as to the purpose.

5.5.6 Travel Sponsored by Industry – is only acceptable to attend out-of-town programs when approved by the President and CEO and under the following circumstances:

5.5.6.1 Training is being provided on products or equipment already purchased by CCMB when it cannot be reasonably provided locally or on-site.

5.5.6.2 Products or equipment are being evaluated for purchase as part of the Request for Proposals process where there is an identified requirement that vendors must defray all or part of the costs of the off-site visit.

5.5.6.3 Evaluation of innovative practices at another facility where a vendor's products are being utilized.

5.5.6.4 Discretion is used in terms of the reasonableness of the venue and nature of hospitality, travel, accommodation and meals being provided.

5.5.6.5 CCMB Senior Leadership will be informed by the Director of Finance of all Industry-sponsored travel and where applicable, the CCMB staff member will complete a Conflict of Interest declaration if this sponsorship may potentially result in a Conflict of Interest.

5.5.6.6 If deemed necessary for a CCMB staff member to attend a program that does not meet the aforementioned circumstances, then the cost of the registration, travel, accommodations and meals must be approved by the President and CEO and funded by CCMB. A Travel Authorization form must be completed and approved.

5.6 Support from Industry for research is acceptable, with the following conditions:

5.6.1 All Industry-sponsored research proposals must be reviewed and approved by a Research Ethics Board;

5.6.2 No reports (including lab notes or statistical program output) containing information that allows the identification of an individual will be shared with Industry; and

5.6.3 Industry representatives may be part of research steering committees and, where they are bona fide scientists, may be co-investigators or co-authors on research projects, but they may not be involved with review or analysis of identifiable information.

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5.6.4 Industry funding received by CCMB for research purposes must be administered in accordance with the CCMB 'Administration of Clinical Trial, Research and Other Purpose Grant Accounts' Policy No. 04.017 and CCMB 'Clinical Trial Research and Other Purpose Grant Accounts' Policy No. 04.013.

5.7 Endorsements and Testimonials:
CCMB will not provide product or service endorsements for Industry products or services for public or promotional use by the vendors of those products and services. However, CCMB staff are permitted to provide verbal references or written references authorized by the President and CEO when requested by other organizations including healthcare entities that are considering those vendor products and services.

5.8 Ghostwriting:
CCMB staff are prohibited from publishing articles or presentations, as well as producing other forms of media, under their names that are written in whole or in part by Industry representatives.

6.0 REFERENCES:

- 6.1 The Personal Health Information Act of Manitoba.
- 6.2 Confidentiality of Personal Health Information, CCMB Policy No. 06.001.
- 6.3 Conflict of Interest, CCMB Policy No. 01.001.
- 6.4 Canadian Medical Association – "Guidelines for Physicians in Interactions with Industry" (2007) www.cma.ca
- 6.5 Interactions between the University of Manitoba's Faculty of Medicine and the Pharmaceutical, Biotech, Medical Device, and Hospital and Research Equipment and Supplies Industries ("Industry"), University of Manitoba policy, June 3, 2009.
- 6.6 WRHA Policy #10.00.110 - Industry Relationships.

Policy Contact:

All enquiries relating to this policy should be directed to:

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Title/Position:	Chief of Clinical Operations
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DOCUMENTATION

Location:

This policy is located (hard and e-copy formats):

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| 1. | The original signed and approved policy is on file in the Executive Office, CCMB |
| 2. | The e-copy is on file in the CCMB Governing Documents Library, SharePoint |
| 3. | |

Revision History:

Date	Version	Status	Author	Summary of Changes
dd/mm/yyyy	#	Initial, Draft Final Minor/Major revision		
10/02/2006	1	Initial		
04/05/2010	2	Revision		
12/05/2015	3	Revision	Policy Team Sr Leadership	
26/03/2018	3	Minor revision	S.Friedenberger	Reformatted to new template
12/11/2019	4	Minor revision	CCO	Reviewed with only minor revisions.

Approvals Record:

This Policy requires approval by:

Approval	Date	Name / Title	Signature
		Not required.	

FINAL APPROVAL:

Date	Name / Title	Signature
Nov 12, 2019	Dr. S. Navaratnam President and CEO, CCMB	<i>Original signed by Dr. S. Navaratnam</i>