

Good Psychiatric Practice

Relationships with
pharmaceutical
and other related
organisations

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Introduction

This document provides guidance to those interacting or working with commercial organisations, including the pharmaceutical industry, on behalf of the Royal College of Psychiatrists. The guidance applies mainly to competing interests but also includes advice on maintaining boundaries and clarity of roles.

All psychiatrists must follow the guidance and standards of the General Medical Council (GMC) and their employing organisations for all aspects of their work, including clinical practice, research, teaching and any other roles they undertake in their capacity as a psychiatrist. Where relevant, they must follow codes of practice published from time to time by organisations such as the Association of the British Pharmaceutical Industry (ABPI), the Medicines and Healthcare products Regulatory Agency (MHRA) and the government.

Not all competing interests affecting psychiatry are financial in nature. Other examples include the possible competing interest between a researcher's allegiance to a school of thought and the integrity of psychotherapy research, or between a psychiatrist's political commitment and patients' welfare (Maj, 2008).

Those who hold an elected or appointed post within any part of the College and/or who undertake any work for, or represent, the College in any capacity will be expected to follow the general guidelines mentioned above, and also the guidelines outlined explicitly in this document.

Meaning and scope of 'competing interest' for purposes of this guidance

A 'competing interest' arises when a psychiatrist's professional judgement concerning a primary interest (such as a patient's welfare or the validity of research) could be influenced by another interest they hold (such as financial gain).

Essential to the definition is that the psychiatrist could be influenced by the competing interest when dealing with the primary interest. A declaration must be made if an interest exists which either could influence the psychiatrist's professional judgement or could be construed, or perceived by others, as doing so.

General guidance

- 1 Psychiatrists should make full public disclosure and be open with regard to their competing interests when involved in any College activity. When in doubt, it is preferable to err on the side of disclosure.
- 2 Psychiatrists representing the College in any capacity must, in their interactions with other organisations, comply with the requirements of:
 - *Good Medical Practice* (General Medical Council, 2013)
 - *Good Psychiatric Practice* (Royal College of Psychiatrists, 2009)
 - *Good Psychiatric Practice: Code of Ethics* (Royal College of Psychiatrists, 2014).

Additional guidance

Psychiatrists should also be aware of:

- 1 The *Code of Practice for the Pharmaceutical Industry* produced by the ABPI (2015). This has been agreed with the Medicines Control Agency, the Royal Pharmaceutical Society and the British Medical Association and is regularly updated.
- 2 The Prescription Medicines Code of Practice Authority (PMCPA) established by the ABPI in 1993 to operate the ABPI Code of Practice for the Pharmaceutical Industry. Their website (www.pmcpa.org.uk) provides information and advice on the Code.
- 3 The National Health Service (NHS)/ABPI model Clinical Trial Agreement (mCTA) gives advice on the content and timing of publications arising from studies funded by pharmaceutical or other commercial organisations (www.abpi.org.uk/our-work/library/guidelines/Pages/mcta-england.aspx)

Declaration of competing interests

The College collects declarations of competing interests for members of its Board of Trustees. This process will be extended to cover all members elected or appointed to Council. The information on competing interests will be held on the restricted area of the College website that is accessible only to College members. This information will be available to non-members via a written request to the Chief Executive of the Royal College of Psychiatrists.

- Members of College committees, including faculties, divisions and special interest groups, will be asked at the beginning of the meeting, as a standing agenda item, to declare any competing interests in relation to the agenda of that group/meeting. These will be recorded in the minutes of the meeting and will be available to others via a written request to the Chief Executive.
- Authors of College publications, including articles published in any College journal, must declare any personal interest or association with organisations relevant to the subject of the publication or article.

Declaration of interests form

A declaration of competing interests form should be completed online by anyone presenting at any meeting of the Royal College of Psychiatrists. For the purposes of the declaration, presentations include workshops as well as lectures or seminars. A separate declaration should be completed for each presentation.

- If a presenter is unable to complete the online form and does not have any interests to declare, they may send an email or letter to the relevant staff member instead.
- Presenters must declare any relevant interests relating to the previous 36 months and the 12 months following the date of their presentation.
- All declarations must be submitted at least 1 month before the event.
- Declarations of speakers' competing interests must be displayed on the College website and should be accessible to all. If in doubt, College Officers or members can contact the Treasurer or Registrar for advice before filling in the declaration.

Speakers will not be able to present at College events unless they submit a declaration of competing interests before their presentation.

Organised meetings

Psychiatrists representing the College should only agree to participate (as either speakers or attendees) in meetings organised by pharmaceutical companies or other commercial organisations if they are satisfied that the meeting is primarily educational. It must be clear that attendance for other purposes, such as hospitality and/or promotion of goods and services, is secondary.

Travel, accommodation and provision of food and drink should not be of a standard greater than that which the recipient would purchase for themselves.

Any honorarium should be declared to the College.

Any competing interest must be disclosed to the College by filling in the online declaration of interest form.

College activities, the pharmaceutical industry and other commercial organisations: guidance

Advertising

The principal purpose of selling advertising space should be that the income it provides will improve the quality of educational or scientific activities supported by the College. This may include research, meetings and conferences, prizes and fellowships, public education materials, newsletters and scientific publications.

Commercial advertising may not be used to support the publication or distribution of guidance on good practice, or consensus statements such as clinical guidance.

Ownership and acknowledgement

Commercial and other organisations, including pharmaceutical companies, may support medical educational activities and other College activities. The guiding principle in such cases is that the College must retain full control of the title, educational and/or scientific content of any event or product and the level of advertising.

Some proportionate and discreet acknowledgement of the supporting organisations can be given.

The College must ensure in relation to any advertising it accepts that the content could not be construed as implying that the College endorses a particular product. Product and brand names must never be referred to in acknowledgement statements.

Approaches to commercial or other organisations

Initial approaches to or from potential advertisers should be negotiated only by College Officers or by designated College staff.

Every effort must be made to attract a wide range of advertisers – including government agencies, charitable trusts and foundations, as well as commercial and other organisations – so that the College is not overly dependent on any one source of commercial funding.

Impartiality

All advertising ‘packages’ should be negotiated to represent the best interests of the College and/or the relevant faculty, section, special interest group or division.

College Officers and/or staff should remain impartial.

Financial guidance and transactions

On 8 July 2016 the College’s Finance and Management Committee reaffirmed the 2002 Central Executive Committee decision that no more than 5% of College income should be derived from sponsorship from pharmaceutical or related organisations. The amount of income received from this source should be reported on an annual basis.

The College’s auditors require that all financial transactions within the UK should be handled by the College’s Finance & Operations Department. This is to ensure that all activities receive the benefits of the College’s charitable status.

The Finance & Operations Department will produce detailed accounts for any meeting or initiative on request.

Meetings, conferences and educational events

Unrestricted educational grants can be accepted from commercial or other organisations to support College educational activities, with the proviso that the donor should not exercise control over the use of the grant or the content of the educational activity supported.

This section relates to meetings, conferences and events organised in the name of the College and/or using the College logo.

- Income from pharmaceutical companies and other commercial organisations which does not meet this standard can only be accepted for exhibition stands and inserts in delegate packs.
- Gifts and promotional items on exhibitors' stands should be inexpensive and educational in nature.
- Acknowledgement of any exhibition sales should appear at the end of the final programme.
- Lectures should not be named after commercial organisations.
- College members do not receive honoraria to speak at any College meetings and money from commercial organisations may not be used for this purpose or for travel, accommodation etc. Speakers need to be informed of these arrangements, and chairs of faculties, special interest groups and divisions are responsible for ensuring compliance.
- The College should retain control of the title, educational and/or scientific content and the level of hospitality and advertising associated with any event.
- The dominating or intrusive presence of commercial or other organisations at College meetings is not appropriate. The presence of exhibitors at College meetings, commercial or otherwise, should not intrude on the overall activities.
- When a commercial or other organisation organises its own educational meeting, no implicit or explicit endorsement from the College should be claimed. However, it is acceptable at these meetings for speakers, chairs or discussants who are College office holders to be described as such.

Research undertaken on behalf of the College

- All relevant statutory regulations must be complied with, and the highest standards of best practice should be adhered to.
- A full risk assessment should be undertaken of both the safety and probity of the research and the reputation of the College. Relevant senior managers and/or Officers of the College should be involved.
- When pharmaceutical companies and commercial organisations fund research, there should be clear acknowledgement of the company's involvement and a full declaration of interests.
- The purpose of the funding should be to promote genuine scientific research, and research should be independent of the company. Its methodology, results and conclusions must not be influenced by the donor or its associates.

- The College should retain control of the title, educational and/or scientific content and results of any commercially funded research. This commercial funding should not affect the outcome or the dissemination of the outcome of any research.
- Particular products should not be promoted.
- The Registrar, Treasurer, Director of Finance & Operations and the relevant head of department should be informed of any commercially funded research being negotiated.

Prizes and fellowships

The title of prizes and fellowships, and regulations for their award, must be determined by the Dean and endorsed by the Education, Training and Standards Committee.

Prizes and fellowships should not be sponsored by pharmaceutical companies.

Public education activities

Named sponsorship from organisations that would have no direct gain from association with the College may be used to facilitate the distribution of mental health information for the general public, teaching packages and other published outputs.

The contents or production of written materials should remain under the control of the Director of Strategic Communications and needs to be developed according to NHS England's Information Standard (www.england.nhs.uk/tis). There should be clear but modest acknowledgement of the organisation's sponsorship.

Named sponsorship from the healthcare sector, including the pharmaceutical industry, should not be used for any public education activities or materials.

Sponsors cannot be involved in the development of public information materials, as these must be neutral and evidence based.

Scientific publications

Authors of papers published in College journals must declare any potential competing interests in line with the rules and guidelines of the relevant journal and under the oversight of the journal's editor.

Commercial and other organisations may advertise in scientific publications. The editor, advised by the Publications Management Board, determines the level of such sponsorship. The Registrar, Treasurer, Director of Finance & Operations and Director of Publications and eLearning should be informed of any sponsorship being negotiated.

Newsletters and website

It is not appropriate to seek sponsorship of newsletters or the College website.

Where electronic versions of sponsored materials (e.g. campaigns and public education information) appear on the College website, then the original sponsor may be credited.

Gifts

College Officers and staff should not receive gifts or any other form of inducement in relation to commercial sponsorship of College activities.

It is the responsibility of all of the relevant College Officers, directors of departments, heads of sections and other staff to ensure that this guidance is followed.

References

Association of the British Pharmaceutical Industry (2015) *Code of Practice for the Pharmaceutical Industry 2015 together with the Prescription Medicines Code of Practice Authority Constitution and Procedure*. ABPI & PMCPA (http://www.abpi.org.uk/our-work/library/guidelines/Documents/code_of_practice_2015.pdf).

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General Medical Council (2013) *Financial and Commercial Arrangements and Conflicts of Interest*. GMC. Available at http://www.gmc-uk.org/guidance/ethical_guidance/21161.asp.

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