

Working with Pharmaceutical & Biomedical Organisations Policy

Purpose

The policy establishes Breast Cancer Network Australia's (BCNA's) position in relation to engagement, relationships and sharing data or information (working) with for-profit Pharmaceutical and Biomedical Organisations (and individuals).

It also helps outline our expectations of staff who represent BCNA when

1. working with or engaging with for-profit Pharmaceutical and Biomedical Organisations (and individuals) to achieve our purpose.
2. sharing (or receiving) information with for-profit Pharmaceutical and Biomedical Organisations (and individuals).
3. reviewing risks and perceived conflicts of interest in working with for-profit Pharmaceutical and Biomedical Organisations (and individuals) and
4. running or attending events where Medicines Australia codes of conduct do not apply.

Scope

This policy applies to the approaches used by BCNA in assessment and communication (including raising awareness and advocacy) of information, treatments, trials, services and products developed by for-profit Pharmaceutical and Biomedical organisations (and individuals).

It also governs the relationships with these organisations and how information and data are shared with BCNA, as well as sets guidelines for how data and information that is provided by for-profit Pharmaceutical and Biomedical Organisations is used by BCNA.

Where relevant, the requirements of this policy may also apply to any organisations with similar commercial interests in the health sector (e.g. Private Health Providers) that will also conform with this policy, guided by the Chief Executive Officer and Director Policy, Advocacy & Support Services.

Finally, this policy covers the expectations and requirements of BCNA staff and for-profit Pharmaceutical and Biomedical Organisation staff at "closed" events outside the scope of the Medicines Australia codes of conduct.

Out of Scope

This policy does not apply to any financial arrangements with not-for-profit Pharmaceutical and Biomedical Organisations, which must be formalised and endorsed by the Chief Executive Officer and approved by the BCNA Board outside the scope of this policy.

Policy Statement

Breast Cancer Network Australia (BCNA) is committed to developing and maintaining a measured relationship with the range of companies who are developing and/or providing

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breast cancer treatment and care. BCNA acknowledges that working with these companies is critical to the achievement of our goals and in particular our advocacy goals for informing policy and securing public funding for Breast Cancer treatments.

Additionally, BCNA understands that it has responsibilities to its members to provide impartial information on breast cancer treatment and care, as well as advocate impartially to help make treatments more accessible to BCNA members and those affected by breast cancer more broadly.

BCNA have identified its position for working with for-profit Pharmaceutical and Biomedical Organisations (and individuals) in Schedule I.

Application

The following schedules outlined below cover the application of this policy in BCNA:

- Schedule I: BCNA's position when working with for-profit Pharmaceutical and Biomedical Organisations (and individuals)
- Schedule II: BCNA's principles for engaging with for-profit Pharmaceutical and Biomedical Organisations (and individuals)
- Schedule III: Information Sharing between BCNA and For-Profit Pharmaceutical and Biomedical Companies and
- Schedule IV: Branding and Acknowledgement
- Schedule V: Roles and Responsibilities

Non-Compliance

There are no exceptions to this policy or the attached Schedules. BCNA may consider breaches of this policy as amounting to serious misconduct that may result in disciplinary action including, but not limited to, suspension or dismissal.

BCNAs Chief Executive Officer, or their nominated delegate, has complete discretion in relation to the management of breaches of this policy. In accordance with our Disciplinary Policy, BCNA will consider each matter on a case-by-case basis and manage each breach accordingly.

If you become aware that a BCNA representative has breached this policy, you must inform your manager or Executive member.

Related Policies and Documentation

The following documents are referenced within, or related to, this policy and should be reviewed in support of the interpretation and application of this policy:

- BCNA Code of Conduct,
- BCNA Consumer Representative Code of Conduct,
- BCNA Confidentiality Policy,
- BCNA Sponsorship Policy,
- Medicines Australia Code of Conduct (see below)
- BCNA Media Policy, and
- BCNA Fundraising, Donation and Bequest Policy.

The Medicines Australia Code of Conduct can be accessed via the following link:
<https://www.medicinesaustralia.com.au/code/transparency-reporting/health-consumer-organisation-support-reports/>



Policy Administration

This policy is reviewed every 3 year/s, or earlier as determined by the Approval Authority or Policy Sponsor.

Both endorsement by the Policy Sponsor and approval from the Approval Authority must be obtained prior to the implementation of this policy.

Schedule I: BCNA's position on working with for-profit Pharmaceutical and Biomedical Organisations (and individuals)

BCNA will:

- work with a range of for-profit Pharmaceutical and Biomedical Organisations, and not align itself with, or give preference to, any one particular entity.
- limit working relationships with for-profit Pharmaceutical and Biomedical Organisations to specific purposes, subject to the provisions of this policy, including advocacy and raising awareness for BCNA members of the treatments, products, information and services.
- raise awareness of services available that align with our purpose by providing BCNA press releases, web articles, social media and any other owned channels to control the messaging to our members.
- provide our Consumer Representatives with a set of values to support engagement with for-profit (and not-for-profit) Pharmaceutical and Biomedical Organisations, including during the support of trials or focus groups or other circumstances when they are acting on behalf of BCNA.
- ensure BCNA's relationships with for-profit Pharmaceutical and Biomedical organisations are not subject to any conditions that are either unacceptable to BCNA, or not in the best interests of Australians with breast cancer.
- maintain a register of all involvement with for-profit Pharmaceutical and Biomedical organisations, and
 - report on this involvement at quarterly Board meetings
 - report as required to appropriate levels within the Department of Health to meet funding requirements and
 - make the register available for public review on request.

BCNA will not:

- enter into sponsorship arrangements with pharmaceutical or biomedical companies.
- directly promote or provide media quotes to for-profit pharmaceutical or biomedical companies or organisations for use in their marketing or promotional material.
- accept direct funding from pharmaceutical or biomedical companies to undertake any activities, or for travel and accommodation.
- accept free or discounted fees for attendance to events that are directly paid for or directly subsidised by for-profit Pharmaceutical and Biomedical organisations.
- accept gifts from for-profit Pharmaceutical and Biomedical organisations.
- charge Pharmaceutical and Biomedical Organisations to provide Consumer Representatives/Seat at the Table services, or individuals to become Consumer Representatives.

BCNA may, subject to risk assessment:

- accept discounted or waived fees for attendance to events run by institutions or entities that are sponsored by for-profit Pharmaceutical and Biomedical organisations if the discounts are generic and not BCNA-specific (e.g. early-bird discount).
- attend events run by for-profit Pharmaceutical and Biomedical organisations subject to the requirements of this policy

Schedule II: BCNA's principles for engaging with for-profit Pharmaceutical and Biomedical Organisations (and individuals)

The following ten (10) principles have been identified by BCNA to guide informed decision making when working with for-profit Pharmaceutical and Biomedical Organisations (and individuals):

Principles:

Principle	Description
Agreement for all interactions	BCNA will ensure that any interactions with for-profit Pharmaceutical and Biomedical Organisations (and individuals) will be done with a supporting agreement on formal and informal basis. This includes <ul style="list-style-type: none"> • private physicians (individuals) who BCNA engage with in formal arrangements (e.g. strategic advisory group members, providing services to members, etc.) and • general arrangements (e.g. invitations to speak at BCNA events, advice on appointing representatives to a research project, etc.)
Impartial messaging by BCNA	BCNA will ensure that any messaging of content provided by for-profit Pharmaceutical and Biomedical Organisations is not promotional in nature.
Mitigate Direct Benefits from BCNA's Awareness-Raising	Wherever possible, BCNA will ensure any awareness-raising activities do not provide direct benefit to a specific for-profit Pharmaceutical and Biomedical Organisations (or individuals).
Limit Information Sharing for Competitive Advantage	Whilst respecting that there is mutual benefit from information sharing, BCNA will ensure any information shared with for-profit Pharmaceutical and Biomedical Organisations does not provide unfair competitive advantage to any one specific organisation.
Establish Values for Representation	BCNA will ensure that this set of principles are available for staff who are working with health professionals or for-profit pharmaceutical and biomedical organisations to ensure that engagement aligns with the mission, vision and purpose of our organisation.
Controlled Branding and Acknowledgements by BCNA	BCNA will ensure that for-profit Pharmaceutical or Biomedical companies, Organisations or Individuals: <ul style="list-style-type: none"> • do not use our branding in their promotional material. • do not leverage quotes or promote specific input from our team members and

Principle	Description
	<ul style="list-style-type: none"> do not unfairly capitalise on any press releases prepared by BCNA for raising awareness of their products or services to our members.
No Sponsorship	BCNA will ensure that no sponsorship comes from for-profit Pharmaceutical and Biomedical Companies as to manage the risk of conflicts of interest.
Impartial event attendance and participation by BCNA	<p>BCNA staff will consider invitations to attend, or present at pharmaceutical or biomedical company sponsored conferences, meetings and events on the basis that these meetings are a source of information relevant to BCNA's work for consumers. BCNA attendance will be reviewed on merit and with full disclosure will be documented in our involvements register. Our attendance will not be based on any expectation that BCNA will promote the products being discussed.</p> <p>BCNA, our staff and our Consumer Representatives will only present or actively participate in for-profit Pharmaceutical and Biomedical Organisation run or sponsored events to further progress BCNA's mission or objectives.</p> <p>BCNA will not participate in events solely for the purpose of association with for-profit Pharmaceutical and Biomedical Organisations, to ensure that no competitive advantage is provided to the event organisers.</p>
No consulting or advisory by BCNA	BCNA does not provide a consultancy service and for-profit organisations cannot use BCNA for feedback on marketing, promotion or as part of soft launches. Furthermore, no BCNA staff member can receive a personal payment for consultation services from a pharmaceutical or biomedical company.
Advocacy focus for collaboration	Any collaboration with for-profit Pharmaceutical and Biomedical Companies, Organisations or Individuals should be limited to and directly contribute to the achievement of BCNA's advocacy goals.

Schedule III: Information Sharing between BCNA and For-Profit Pharmaceutical and Biomedical Companies

As there is a mutually beneficial relationship between BCNA and for-profit Pharmaceutical and Biomedical companies, BCNA will ensure that the information shared and distributed is done so for a purpose that directly aligns with our purpose or advocacy objectives.

BCNA also acknowledge the importance of the information shared by us and will ensure it does not provide direct competitive advantage to any one for-profit Pharmaceutical or Biomedical Company, Organisation or Individual over others.

Provision of information from Pharmaceutical and Biomedical Companies to BCNA

BCNA obtains information from pharmaceutical and biomedical companies directly through documents, and indirectly through events/presentations, about new or established products or services. This information is used by BCNA in press releases and other collateral to enable our members to better understand their options for treatments, available products and services as well as guidance for how to access further information.

Provision of Information from BCNA to Pharmaceutical and Biomedical Companies

BCNA provides information to pharmaceutical and biomedical companies only when it will directly benefit Australians affected by breast cancer.

Under most circumstances, information shared by BCNA is publicly available and any requests to engage with BCNA members or health providers is managed through a risk-based screening process:

- Any requests for consumer representatives are passed to the “Seat at the Table” program for engagement and management and any involvement by BCNA Consumer Representatives is governed by the Consumer Representative Codes of Conduct
- Any requests to promote clinical trials run directly by for-profit Pharmaceutical and Biomedical Organisation to BCNA members are initially reviewed by the Director Policy, Advocacy & Support Services for their merit and are either approved, declined, or deferred for promotion to BCNA’s Health Professional Network. The key assessment criteria for approval of distribution of clinical trials is subject to:
 - Whether the study is open or blinded (i.e. the organisation’s name is withheld)
 - The level of recruitment from other sources
 - The level of unmet need within the target treatment group

If requests for personal information about sponsors, donors or members are approved for distribution by the Chief Executive Officer, the Director of Policy, Policy, Advocacy & Support Services and the Director of Fundraising and Marketing respectively; any information provided will be de-identified and will be assessed for its direct competitive advantage to any organisation.

Schedule IV: Branding and Acknowledgements

BCNA will ensure that the following statements are adequately shared with for-profit Pharmaceutical and Biomedical Companies on a regular basis.

Any organisation may direct traffic from their website to BCNA's website, however:

- BCNA's logo cannot be used on any pharmaceutical or biomedical company product or product information.
- Any pharmaceutical or biomedical company wishing to acknowledge BCNA's involvement in the development of material must first obtain written permission from BCNA.
 - Any written permission provided by BCNA will be valid only for the particular activity for which it was requested.
 - A statement advising that BCNA has not accepted financial payment for this activity must also be included for any approved acknowledgement.
 - BCNA will regularly review the permissions granted for use of its logo for relevance and currency to ensure validity
- BCNA will not provide links to for-profit Pharmaceutical and Biomedical Companies or organisations on our website pages, unless deemed necessary for raising awareness in the best interest of our network. If any link is provided on our website, BCNA will not include any company logo with the link on our website or on any other owned channel.