



Guidelines for Avoiding Conflicts of Interest in Relations Between Faculty Members and Industry

Preamble

These guidelines apply to the interactions between McGill's Faculty of Medicine, its Faculty, trainees (students, residents), and staff and its Industry partners. "Industry" is used to refer to pharmaceutical, biotech, and device industries collectively. It is important to note that interactions between McGill University's Faculty of Medicine and Industry can be positive; these relationships can serve to further the missions of McGill's Faculty of Medicine in the provision of excellent patient care, training future generations of physicians, and performing cutting edge research. In the context of these partnerships, these relationships must be above reproach and any potential or real conflicts of interest must be recognized and managed appropriately. With this in mind, the Faculty of Medicine has developed the following guidelines for consideration by its leaders and membership.

Given the Faculty of Medicine's commitment to the highest ethical and legal standards, it is of critical importance to avoid conflicts of interest – whether perceived or real. A conflict of interest is defined as a set of conditions in which one's judgment concerning a primary interest may be unduly influenced by a secondary interest. McGill's Faculty of Medicine recognizes that conflicts of interest do arise. It is not acceptable for motivations of personal gain or professional advancement to influence patient care decisions. These guidelines are meant to provide guidance and direction to members of McGill's Faculty of Medicine when faced with conflicts of interest in their relations with Industry.

The Faculty of Medicine recognizes its commitment to raising awareness of conflicts of interest among its Faculty, trainees, and staff. In light of this, the Faculty of Medicine is committed to providing educational sessions among trainees and Faculty regarding the ethical and professional issues that arise in the context of Physician-Industry interactions.

These guidelines apply equally to students, residents, and Faculty (S/R/F), both on and off University grounds (on-site and off-site).

These guidelines do *not* deal with the relationship between McGill's Faculty of Medicine and Industry in the context of research.



Relations between Members of the Faculty of Medicine & Industry Guidelines for Students, Residents, and Faculty

Industry funding for undergraduate, graduate, & postgraduate medical education

- Any Industry funding for undergraduate, graduate, or postgraduate (U/G/P) medical education or scholarships must be in the form of an educational grant to the University or Hospital Department, and not directed to individuals. The allocation of these funds must be done without Industry involvement, and must be based on pedagogical objectives as determined by the University.

Industry involvement with undergraduate, graduate, & postgraduate medical education

- The control over the content, speaker, and educational materials for teaching rounds given as part of U/G/P medical education must remain solely with the appropriate University-appointed Director or Course Coordinator. • S/R/F who are involved in teaching in the Faculty must declare their conflicts of interest both in writing on any materials submitted and verbally at the time of the lecture. This declaration must be sufficiently detailed for the trainees to be able to make a reasoned judgment about the possibility of bias. Full-time and part-time employees of Industry who have Faculty appointments and therefore a teaching role have the potential for a particularly strong conflict of interest. The course Director or Unit Chair must review the notes, presentations, and declaration of conflict of interest statements from such individuals beforehand to ensure compliance with this policy.

Continuing Health Professional Education (CHPE)

- The relationship between CHPE providers and Industry must conform to the following norms and guidelines: McGill Continuing Health Professional Education (CHPE) office and/or the Code of Ethics of Parties Involved in CME (Conseil Québécois de Développement Professionnel Continu des Médecins).
- In particular, the content and speakers for all educational activities must be determined by the program planners. Industry must not be members of the planning committee. • Disclosure of all relevant conflicts of interest of CHPE planners must be made to the planning committee. • Other national accreditation standards may also be applicable (Royal College of Physicians and Surgeons of Canada, College of Family Physicians of Canada, SCCPD Position Paper on the Role of Industry-Based CME/CPD approved by Boards of Directors of AFMC Nov. 2010).

Non-accredited, Industry-sponsored conferences

- S/R/F should not attend or present at non-accredited conferences organized or supported by Industry. There may be special circumstances in which such conferences provide for unique educational opportunities, particularly as this applies to novel medical devices. In these situations, participation in such conferences serves to enhance patient safety and may be acceptable.

Gifts to individuals

- S/R/F must not solicit nor accept gifts from Industry. Industry support for food and hospitality at non-accredited events, both on-site and off-site, is considered a gift. • S/R/F must not accept payment from Industry for simply attending an activity or conference.

Professional travel

- S/R/F must not accept travel funds from Industry for simply attending a conference. This does not preclude reimbursement of expenses in the context of contractual or other legitimate services.



Site access by Industry representatives

- Access by Industry reps. to individual physicians must be restricted to non-patient care areas, must take place by appointment only, and according to applicable regulations.
- Industry reps. must not be present during any patient care interaction without prior consent from the patient.
- S/R should not interact with representatives of Industry, unless there is a clear pedagogic objective that cannot be met in another manner (ie. learning how to use a novel device). Any interactions between S/R and Industry must only take place with the presence of a Faculty member, and only when these are necessary for the education of the S/R.

Ghostwriting & speaker's bureaus

- S/R/F must always take full responsibility for any presentations made in their name, whether verbal or written. S/R/F must not allow their names to be used for anything that is ghostwritten (ghostwriting is understood to occur when a paid professional writer, whether medically trained or otherwise, writes something credited to someone else).

Pharmaceutical samples

- Individual physicians should not accept pharmaceutical samples. Alternative systems for accepting and distributing samples should be developed that are hospital-appropriate.

Trainees and research

- S/R should not solicit nor accept funds for research from Industry. Funding for research by S/R should generally be provided via the residents' supervisor, research-funding agency, hospital, or university.

Consulting and other contractual relationships outside of research

- Faculty considering entering into consulting or other contractual relationships with Industry must first present the details of the proposed relationship with the Faculty member's Dean, Chair, or senior administrator. Payment of Faculty in this context must be commensurate with the tasks assigned. Previously existing arrangements that are still in effect should be disclosed and reviewed in light of this policy.

Purchasing

- Faculty members involved in purchasing decisions for hospital formularies or for equipment/devices/supplies must disclose any relevant conflicts of interest to the relevant hospital administrator, and recuse themselves from direct involvement in purchasing decisions relevant to their conflicting interests. This does not preclude an individual from participating in the analysis of a product if they offer particular expertise in the relevant area, so long as their conflict has been disclosed and they do not participate directly in the purchasing decision.

2011.9.29