



## **The Irish College of General Practitioners' Sponsorship Policy – April 2020**

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## AIM

This policy document outlines The Irish College of General Practitioners (ICGP) position in relation to sponsorship by way of unrestricted educational or research grants.

## SCOPE

Sponsorship within the health care sector has been primarily from pharmaceutical companies, medical device / supply companies and medical insurance bodies. ICGP considers sponsorship from other sectors as well.

The ICGP Sponsorship Policy applies to any organisation that seeks to:

- Support and provide funding as an unrestricted “Educational” or “Research” grant for ICGP activities – Appendix A
- Obtain ICGP CPD recognition for an external educational activity relevant to General Practice – Appendix B
- Have a partnership agreement, collaboration, memorandum of agreement or deed of sponsorship with the ICGP  
(Please refer to appendices for information specific to these categories.)  
Hereafter all of the above will be referred to as ‘A signed agreement’.

## BACKGROUND

Established in 1984, the ICGP is responsible for postgraduate specialist medical education, training and research in the specialty of General Practice. General Practice is defined as an academic and scientific discipline, and a clinical specialty with its own educational content, research and evidence base and clinical activity orientated to primary care<sup>i</sup>.

The College is the recognised body for the accreditation of specialist training in general practice in Ireland and is recognised by the Irish Medical Council as the representative academic body for the specialty of general practice. At an international level the College is a member of the World Organisation of National Colleges and Academies and Academic Associations of General Practice (WONCA).

Strategic priorities are based on the core values of the College, which reflect the core competencies of General Practice and the eight Domains of Good Professional Practice as identified by the Medical Council of Ireland.

ICGP has a national advisory role in relation to medical standards and interacts regularly with a number of bodies including the Medical Council, Department of Health and Children, the Health Service Executive and the Health Information & Quality Authority among others.

As a membership organisation, ICGP is responsible for providing Continuing Professional Development (CPD) for GPs.

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The principles section of this policy have been developed to help guide decisions about the type of activities the ICGP undertakes and/or recognises as external CPD and for research purposes. The principles also reflect ICGP relationships with other parties, with the objective of ensuring the integrity and good reputation of the ICGP.

### RELATED POLICIES

This policy position should be read in association with the:

- Medical Council's: "*Guide to Professional Conduct and Ethics for Registered Medical Practitioners*" and all subsequent updated IMC documents<sup>ii</sup>
- Codes of practice of associated commercial entities e.g. IPHA Code of Practice for the Pharmaceutical Industry<sup>iii</sup>
- ICGP Guidelines for the Recognition of Educational Events for External Continuing Professional Development.

### PRINCIPLES

The ICGP actively pursues its mission and seeks out relationships with others to achieve its goals. However, any activities or relationships that could tarnish the integrity or reputation of the ICGP or the profession of General Practice or that would diminish the trust placed in them must be, and will be avoided.

#### **1. Conformity with ICGP Purpose**

Any agreements or relationships must enhance and support the ICGP's purpose as outlined in the College's Constitution and Byelaws and elaborated in its mission, vision and strategic plan(s) ([www.icgp.ie](http://www.icgp.ie)) these can be summarised as:

- Promotion and delivery of postgraduate specialist medical education, training and research in the specialty of General Practice
- Promotion of and delivery of CPD activities, programmes and events for GPs and associated health care professionals
- Promotion and delivery of quality research and audit in General Practice for the promotion and development of the specialism
- The mission of the ICGP is to serve the patient, and its members / GPs by encouraging and maintaining the highest standards of general medical practice
- The core values of the College are quality, equity, access and service to the patient.

Activities and relationships that do not further or support the ICGP's purposes have the potential to thwart these purposes in a number of ways, including inadequate accountability, inappropriate use of resources and conflicts of interest.

#### **2. Medical professionalism and ethics**

A signed agreement should be consistent with General Practice professionalism and the Medical Council's "*Guide to Professional Conduct and Ethics for Registered Medical Practitioners – (Amended) 8<sup>th</sup> edition, 2019*" recognising that:

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- The ICGP is the postgraduate training body for the specialty of general practice
- When the ICGP acts, it represents the general practice profession
- The ICGP's actions reflect upon the general practice profession
- The ICGP's stature and reputation are inextricably linked to the profession, the professional stature of its member practitioners and the trust patients place in their GP
- Engaging in activities or relationships that are inconsistent with General Practice professionalism and the *Medical Council's Guide to Professional Conduct and Ethics for Registered Medical Practitioners* would erode trust in the ICGP and therefore will not be acceptable.

### 3. Independence

A signed agreement should not undermine the ICGP's independence:

- To be a credible voice and to be worthy of the trust and confidence of GPs and of the public, the ICGP should be free of undue influence and in control of its own decisions.
- Activities and relationships that may undermine ICGP independence include:
  - Activities or relationships that provide revenue or benefit to the ICGP such that ongoing dependency on the revenue or benefit impedes independence
  - Activities and relationships that create a product or service that are seen to be associated with the ICGP but over which the ICGP does not have final control or veto or the capacity to extricate itself
  - Actions or requests such as direct contact with GPs will be seen as a breach of GDPR
  - Engagements that affect the sole intellectual property rights and ownership of ICGP materials, activities, research findings and publications.

The signed agreement shall not infringe the independence of the ICGP nor the occupational autonomy and independence of any employees or professionals connected with it.

A signed agreement will not result in the granting or the assumption of any obligation or liability whatsoever by the Sponsor to any third party or vice versa. There will be no transfer to 'The Sponsor' of any confidential information, research or personal data in connection with the activities of the ICGP.

The Parties agree and hereby acknowledge that although the Sponsor may receive certain goodwill and public relations exposure because of a signed agreement, a signed agreement is not contingent in any way on receipt of such benefits.

The Sponsor will not intend to and will not in any way coerce or exert influence over, the ICGP or its collaborators, the administration of the fund or the use of any research data thereafter.

The Parties further agree and hereby acknowledge that a signed agreement is not intended in any way to affect the independence of the ICGP or any professionals engaged with the educational or research activity.

#### ***4. Consistency with policy***

A signed agreement should be consistent with all ICGP policies, as well as ICGP mission, goals and strategy. The ICGP develops policy in pursuance of its purpose and mission; these should be referred to when making decisions in connection with activities or relationships.

#### ***5. Conflicting goals and activities***

Relationships with parties whose purpose, goals or activities directly conflict with the ICGP's objectives, mission or vision will be avoided. This does not preclude discussion with others or participation in events for the purposes of obtaining information, monitoring or lobbying.

#### ***6. Transparency***

Professional autonomy, independence and commitment to the scientific method must be clearly stated and maintained in any relationship between the ICGP and a sponsoring organisation.

- Transparency promotes openness to scrutiny and serves to enhance accountability and to discourage relationships or activities that could be considered problematic
- The principle is generally applicable except in connection to matters related to competitive advantage, trade secret or a reasonable agreement of confidentiality
- The educational content of all ICGP recognised CPD activity is based solely on the best available unbiased evidence based medicine
- Sponsorships and supports will be named and acknowledged
- The terms and conditions of a signed agreement will be transparent
- Declarations of interest must be clearly stated at the outset of any discussions relating to entering sponsorship agreements.

#### ***7. Compliance and accountability***

Written agreed processes must be in place to ensure that proposed and ongoing activities or relationships are appropriately reviewed to ensure compliance and clear accountability with these principles.

The ICGP expressly acknowledge for the avoidance of any doubt that the provision of a signed agreement is not linked with the promotion of any product or undertaking of the Sponsor and that no commitment or undertaking has either been sought or given in relation to the prescribing, supply, use or promotion of any products of the Sponsor.

In the event of any changes to laws or regulations affecting the lawful provision of the sponsorship, to the extent it has not yet been fully provided, the Parties shall consult with one another on how to manage the outcome of, and any required amendments to the agreement.

Each party expressly acknowledges that any breach of a signed agreement with respect to compliance with Ireland's anti-bribery and corruption legislation at any time during the term of this Agreement, will constitute a material breach.

Where an exit position becomes necessary, it will be agreed and in writing at the outset and will be in accordance with any and all applicable laws.

## ***8. Data Ownership***

All data generated by Projects will be owned by ICGP. Any reporting will be in such a manner as to not impact on the project's scientific publication(s). No data will be disclosed to any third party except on the explicit agreement of all Parties. The confidentiality of research participants will be maintained at all times.

## ***9. Communications***

All external communication regarding a signed agreement will be through the ICGP, unless otherwise agreed.

## APPENDIX A

### SPONSORSHIP BY AN EXTERNAL ORGANISATION OF AN ICGP EDUCATIONAL ACTIVITY

In considering sponsorship, the following definitions apply:

A sponsor is a business enterprise aiming to use its marketing or education/development budget more effectively to directly target a key audience with its messages.

Sponsorship is:

- A negotiated agreement between the ICGP and the sponsor, where the ICGP receives funds, goods or services from the sponsor in the form of an unrestricted grant
- The ICGP providing the sponsor with publicity, services or other benefits in return for the funds, goods or services received
- Part of a planned approach by the ICGP, not an ad hoc donation or gift of funds, goods or services by an enterprise.

A sponsorship agreement is a written and signed document produced by the ICGP outlining:

- The funds, goods or services the sponsor agrees to provide
- The publicity, services or benefits the ICGP agrees to provide
- The length of time the sponsorship is valid and review periods
- Any terms and conditions of the sponsorship.

A sponsorship proposal is targeted documentation sent or approaches made to sponsors and potential sponsors and includes:

- Information about the proposed sponsored ICGP CPD activity as relevant including:
  - Purpose of the activity
  - Nature of the activity – education, research, etc.
  - Number of GPs likely to attend the activity
  - Location of the activity
  - Guests/speakers of interest at the activity
  - Outline of the activity
  - Benefits of sponsoring the activity
  - The sponsorship monies (or value of goods or services) being sought, and the publicity, services or benefits the College agrees to provide to the sponsor
  - Information about the ICGP, where applicable
  - A confirmation of sponsorship form.

## APPENDIX B

### SPONSORSHIP OF AN EXTERNAL EDUCATIONAL ACTIVITY RELEVANT TO GENERAL PRACTICE SEEKING ICGP CPD RECOGNITION

This policy outlines the criteria that must be adhered to when applying for or receiving CPD recognition by ICGP for an external educational activity.

#### Background

General Practitioners as part of their clinical responsibility, must choose between forms of treatment (or no treatment) based solely on the best available unbiased scientific evidence. That is what the public expects. Therefore educational activity that enables them to fulfil their responsibility must also be free from any bias and be clearly seen to be so.

General Practitioners acknowledge and appreciate the support that pharmaceutical companies and their representatives provide for educational purposes. Through these channels new medications and treatments are introduced, audit and research are encouraged and educational issues explored for the benefit of doctors and patients.

In certain circumstances difficulties may arise. In situations when a pharmaceutical company sponsors an educational activity and also has a vested interest in recommendations that may arise from that meeting, a conflict of interest may occur. In the interests of transparency and good practice this potential conflict should be avoided.

To prevent the potential situation outlined above arising, the ICGP insists that the following practices (many of which are already adhered to) must be adopted as a minimum standard.

#### Pharmaceutical Sponsorship, Marketing and Education - General Ethical Practices

- The educational component of any meeting should be standalone and should not be exclusively related to any company or product/service promotion.
- No incentive or inducement should be requested, offered or accepted at an educational meeting which is designed to encourage the use of a particular product.
- Only unrestricted educational and research grants are acceptable and this should be acknowledged in presentations and programmes.
- Where there is a contribution from a pharmaceutical company this should be clearly stated (and any conflict of interest or potential conflict of interest will be declared according to best practice and recorded in signed agreements).
- All promotional activity should be confined appropriate areas as set by ICGP relevant to the particular event.
- Large meetings (regional or national) should, as a matter of principle, have more than one sponsor. However a company or organisation can sponsor large meetings without a specific clinical component and no direct link to a product or company.
- It is acknowledged that small meetings (expected to attract 20 doctors or less) may not suit the multiple sponsor format. For this reason small events may have a single sponsor. However, over the course of several meetings a number of sponsors should be used.



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- As an alternative to single sponsorship, consideration should be given to inviting several companies to contribute to a project's expenses/educational fund held by a tutor or faculty treasurer/secretary which could be used to fund expenses for individual events or for an event to which pharmaceutical representatives could be invited.
- Pharmaceutical representatives should not give lectures or present at educational events without prior expressed agreement with ICGP (brief introductions/close only permitted).
- Where a pharmaceutical company promises or organises sponsorship (large or small) for GPs, either individually or in groups, GPs should satisfy themselves that there is no conflict of interest for themselves or their patients in accepting such offers.

### External CPD Recognition by ICGP

In addition to the principles outlined above, the following points must be considered when seeking CPD recognition for educational activity for GPs for External CPD:

- For recognition purposes, an independent GP panel will review all materials of any activity intended for GPs and is responsible for verifying that the activity conforms to ICGP guidelines/policy
- Slides, PowerPoint, handouts and any other educational material should be prepared by speakers or organisers in line with IPHA and ICGP guidelines
- Meetings to launch or market a specific product will not be recognised by the ICGP for educational purposes or allocated credits for CPD
- Recognition will only be recommended for educational sessions of relevance to GPs. Please note that CPD activity is considered in its entirety, therefore all sessions must conform to the sponsorship rules
- Where recognition is recommended, this does not imply support for or endorsement of any product or company, directly or indirectly also associated with the educational activity and published material for the activity must never apply such association
- Only ICGP approved wording may be used on all branding, advertising, the certificate of attendance etc. relating to a recognised activity
- Material for the activity must never include any product, brand/insignia.

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<sup>i</sup> <https://www.woncaeurope.org/page/definition-of-general-practice-family-medicine>

<sup>ii</sup> <https://www.medicalcouncil.ie/news-and-publications/reports/guide-to-professional-conduct-ethics-8th-edition.html>

<sup>iii</sup> [https://www.ipha.ie/getattachment/Publications-Submissions/IPHA-publications/V8-3\\_-IPHA-Code-of-Practice-for-the-Pharmaceutical-Industry\\_effective-01-02-2018.pdf.aspx](https://www.ipha.ie/getattachment/Publications-Submissions/IPHA-publications/V8-3_-IPHA-Code-of-Practice-for-the-Pharmaceutical-Industry_effective-01-02-2018.pdf.aspx)