

Policy Direction - Pharmaceutical Industry Relationships

[Definitions of terms that are underlined are found at the end of this document.]

Rationale and Relationship to Mission, Principles and Values

The Multiple Sclerosis Society of Canada (MS Society) has nurtured a mutually beneficial relationship with the corporate sector for many years. With the development of specific drugs to modify the course of MS, pharmaceutical companies have been asked to or have offered to support MS Society programs. Support may be in the form of direct donations or monetary support for educational programs, conferences, publications, fundraising events and research projects.

Accepting support from the pharmaceutical industry can aid in fulfilling the mission of the organization. By accepting funding, the MS Society is better able to meet the needs of people with MS in support of our mission, while also gaining the benefit of being associated with a company working in the field of multiple sclerosis.

Policy Objective

This policy provides a framework under which the MS Society can accept funds while maintaining control over program content and delivery and ensuring activities related to such programs are compatible with the MS Society mission and meet ethical and social responsibilities. The related procedures are an integral part of the MS Society's approach to pharmaceutical companies; both the policy direction and the procedures shall be followed when undertaking programs funded by pharmaceutical companies.

Policy Application

This policy applies to the relationship between all levels of the MS Society and pharmaceutical companies that manufacture prescription or non-prescription products, such as over-the-counter drugs, vitamins and dietary supplements.

This policy applies to volunteers and staff at all levels of the MS Society (national office, divisions and chapters).

Authorization

The policy was approved by the MS Society Board of Directors on June 13, 2014 .

Policy Details

The Executive Team is authorized to develop detailed procedures for this policy direction no later than six months following its approval.

1.0 Guiding Principles

- 1.1 The MS Society at all levels (national office, divisions and chapters) are permitted to accept funds from pharmaceutical companies provided this policy direction, the Pharmaceutical Industry Relationships, the Pharmaceutical Industry Relationship Procedures, the Acceptance of Gifts and Sponsorships Policy Direction and any related procedures are followed.
- 1.2 The MS Society at all levels should seek financial support from all relevant pharmaceutical companies. While it is permitted to designate particular projects or programs to particular companies, it is not allowable to have a single, exclusive financial support partnership with one company for all projects and programs.
- 1.3 Pharmaceutical companies that provide support shall not determine how the MS Society presents information. The MS Society of Canada shall rely on documented scientific evidence and the advice of knowledgeable medical practitioners in presenting such information. The MS Society shall be transparent and acknowledge support of sponsoring companies in appropriate ways as detailed in the procedures.

2.0 Programs and projects eligible for pharmaceutical industry support

Following are general categories of programs and projects that are eligible for and frequently supported by the pharmaceutical industry. See 3.0 for a list of programs and projects that are not eligible for pharmaceutical industry support.

- 2.1 Educational programs for people living with MS, family members, caregivers or health care professionals;
- 2.2 Educational materials for people living with MS, family members, caregivers or health care professionals;
- 2.3 Staff and volunteer training and strategy development sessions;
- 2.4 MS Society-initiated research projects including innovative approaches such as partnering to commercialize research findings to speed the development of effective MS therapies;
- 2.5 Advocacy programs to influence governments, government agencies and private industry to benefit people living with MS, family members and caregivers;
- 2.6 Sponsorship of fundraising events including nation-wide events (MS Walk, MS Bike, Women Against MS - WAMS);
- 2.7 Company participation in fundraising events as fundraising teams;
- 2.8 Major gifts either directed to a specific program or project or general support.
- 2.9 Training programs for researchers and trainees.

3.0 Educational materials not eligible for pharmaceutical industry support

Certain kinds of educational materials are not eligible for funding by the pharmaceutical industry. The list may be amended from time-to-time so the procedures document should be reviewed frequently. The intent of this prohibition is to ensure there is no possible perception of external influence on the content of these fundamental MS Society documents.

- 3.1 Annual or impact reports;
- 3.2 General information brochures about the MS Society;
- 3.3 General information brochures about membership in the MS Society;
- 3.4 General client services brochures, e.g., brochure describing basic services available from the MS Society.

4.0 Standard written agreement

The MS Society at the appropriate level shall develop a written agreement with the supporting company. The agreement must recognize the autonomy and independence of the MS Society, and that the MS Society is solely responsible for the identification of needs, determination of objectives, selection of content and speakers (where such are used) and execution of programs and projects that are supported by pharmaceutical companies. See the procedures for more details and a sample standard agreement.

5.0 Authority to sign agreements

The Chief Marketing and Development Officer is authorized to sign or delegate the signing of agreements with pharmaceutical companies with the national office. Division presidents are authorized to sign or delegate the signing of agreements with pharmaceutical companies within their respective divisions, including chapters.

6.0 Recognition of support

The MS Society shall acknowledge support by pharmaceutical companies for all sponsored programs and projects. References shall be made only to the corporate name and corporate logo of the company, not to specific products. Speakers shall disclose to the audience any financial relationship they have with pharmaceutical companies. See the procedures for more details.

7.0 Endorsement

The MS Society shall not endorse any product or service provided by any company or organization, however, the decision to associate (for example, by linking to a website) with a service or program is not deemed to be an endorsement.

8.0 Privacy and confidentiality

The MS Society shall maintain the privacy and confidentiality of people affected by MS as per the MS Society Privacy and Confidentiality Policy Direction. MS Society staff and volunteers shall not provide company representatives with names and other contact information of people affected by MS. This includes mailing lists of any kind.

9.0 Gifts and honoraria

MS Society staff and governance volunteers, who are board directors, officers, and members of board standing committees at any level of the MS Society, shall not accept honoraria of any amount from pharmaceutical companies while acting on behalf of the MS Society. If honoraria are provided to all speakers, the honoraria to MS Society staff and governance volunteers shall be payable to the MS Society. MS Society staff and governance volunteers may accept nominal personal gifts.

MS Society staff and governance volunteers may accept reimbursement for appropriate expenses.

10.0 Wearing or using pharmaceutical company materials

MS Society staff and volunteers acting on behalf of the MS Society shall not wear or use articles bearing pharmaceutical company names, product names, logos or other insignia. This includes items of clothing, pens, notepaper, binders and similar materials.

An exception is allowed for MS Society staff and volunteers acting on behalf of the MS Society if the pharmaceutical company is a sponsor of an MS Society event or program, including TeamMS (details and examples provided in related procedures). In those cases, MS Society staff and volunteers acting on behalf of the MS Society may wear and/or use the labelled materials in the context of the event or program.

11.0 Pharmaceutical company displays and materials

In Canada, pharmaceutical companies are not allowed by law to advertise prescription drugs directly to consumers except under limited circumstances. Pharmaceutical companies shall not promote their products at any MS Society program or event that is open to people affected by MS and/or the public through displays or materials that includes the name of the product. Pharmaceutical companies may be sponsors and be offered the opportunity to be recognized in meeting programs, on signage, and through verbal acknowledgement. Only the name of the company can be used, not the product.

An exception is allowed for programs for which the primary audience is health care professionals and not people affected by MS.

Executive Champion

The Chief Marketing and Development Officer is the Executive Champion of the Pharmaceutical Policy.

Monitoring and Compliance

The Chief Marketing and Development Officer is responsible for reporting to the President and Chief Executive Officer through the quarterly compliance reports regarding compliance with the Pharmaceutical Policy. The Leadership Giving staff shall report quarterly to the Chief Marketing and Development Officer regarding

compliance with the Pharmaceutical Policy. The Leadership Giving staff at the national office and divisions have responsibility for ongoing contact with pharmaceutical companies and may be consulted for expertise and training.

Related Policies, Legislation

This policy direction, along with other MS Society policy directions, provides the ethical framework that allows the MS Society to accept support from the pharmaceutical industry. The MS Society follows federal government legislation and regulations prohibiting direct-to-consumer advertising. The MS Society reviewed the [Rx&D Code of Ethical Practices](#) when developing this policy direction and considers the Code to adhere to similar principles as this policy direction.

Policy Review

This policy direction is to be reviewed at a minimum every five years following approval.

Definitions

Chapter - A subunit of a division and should be understood to mean the chapter office (if one exists), the chapter board and the activities that take place under the chapter name.

Division – The division head office, the division board, all chapters and other subunits that the MS Society board may create or delegate to be created from time-to-time and the activities that take place under the division name.

Endorse/ endorsement – Approval or support of an activity, company or product in a public manner.

Executive Team – The most senior level of staff leadership within the MS Society comprised of the president and chief executive officer, division presidents, chief financial officer and vice-president, human resources, chief development officer, national vice-presidents of research, client services and government relations. One person may hold more than one position. The president & chief executive officer may alter the composition of the Executive Team as required from time-to-time.

National office – The part of the MS Society that coordinates MS Society work as a whole, providing strategic oversight and sharing of best practices in all functional areas and administering the research program and the direct marketing program. National Office staff are mostly, although not exclusively, located at the head office in Toronto.

Pharmaceutical industry – Term used to describe the overall category of companies that develop, manufacture and sell chemical or biologic substances both

prescription and non-prescription intended for use in the prevention, treatment or cure of disease.

Pharmaceutical company – Entity that sells any chemical or biologic substance both prescription and non-prescription intended for use in the prevention, treatment or cure of disease. In Canada, such substances must be approved by Health Canada before they can be sold.

Rx&D – Canada's Research-Based Pharmaceutical Companies (Rx&D) is the national association of the research-based pharmaceutical companies in Canada.