

BOPA Position Statement on Transparency When Working With Pharmaceutical Industry and Declaring Conflicts Of Interest

1. Introduction

In recent years there have been many concerns in the media and public domain about actual and potential conflicts of interest across the NHS¹ including NHS pharmacists².

The British Oncology Pharmacy Association (BOPA) is a professional interest group; it is not an NHS organisation. BOPA represents pharmacists working in the NHS and pharmaceutical industry and works closely with NHS organisations. BOPA Executive Committee members commit to abide by all NHS and ABPI guidance on managing conflicts of interest, including making declarations.

This position statement outlines BOPA's relationship with the pharmaceutical industry and BOPA's views on the provision of medical education for its members via Industry sponsorship.

The position statement aims to provide open and transparent information on:

- how BOPA works with the pharmaceutical industry
- BOPA's financial relationship with its Secretariat
- how BOPA manages its finances (as a registered charity, see below)
- how BOPA supports its members to avoid any conflict of interest

2. About BOPA:

BOPA is registered as a Charitable Unincorporated Association, Charity No: 1065026.

BOPA has to abide by the rules of the Charity Commission. All of BOPA's financial papers are all prepared under these rules and are published openly on the charity commission website. See appendix one for copy of latest declaration from charity commission website.

BOPA has a constitution which governs how it operates and outlines its powers. The current constitution can be found at <http://www.bopawebsite.org/publications/committee-documents>.

Note: The BOPA constitution has been recently updated and subject to consultation with members, it will be approved at the Annual General Meeting in October 2017. The updates to the constitution were to strengthen the committee's ability to manage conflicts of interest.

BOPA has both individual members at cost of £70 per year (£63 if paid by direct debit) and corporate membership for pharmaceutical companies at £700 per year (see appendix two).

3. Background

In February 2017 NHS England issued guidance for NHS staff and organisations entitled Managing Conflicts of Interest in the NHS³. NHS England defines conflict of interest as:

"A set of circumstances by which a reasonable person would consider that an individual's ability to apply judgement or act, in the context of delivering, commissioning, or assuring taxpayer funded health and care services is, or could be, impaired or influenced by another interest they hold."

It is acknowledged that having interests is not in itself negative, but not declaring and managing them is. In March 2017 the Royal Pharmaceutical Society (RPS) published 'A Professional Guide to Support Pharmacists Identify and Appropriately Make Declarations of Interest'⁴. The RPS encourages its members to follow the guidance as it

'protects the reputation of pharmacy and pharmacists, assures professional integrity and public confidence in pharmacy, whilst enabling collaborative working and constructive dialogue with suppliers of goods and services to the NHS, to continue to flourish through openness and transparency.'

NHS Scotland has national guidance but it applies mainly to board members⁵.

UK Pharmaceutical companies are represented by the Association of the British Pharmaceutical Industry (ABPI) and the British Generic Manufacturers Association (BGMA), which includes the British Biosimilars Association (BBA). The ABPI has a code of professional conduct for its members to follow which has detailed guidance on working with NHS and avoiding potential conflicts of interest.⁶ The ABPI encourages declarations and publishes details of payments and other benefits in kind made by industry to Health Care Professionals and Health Care Organisations.

4. BOPA's Financial and Governance Arrangements

BOPA is a charitable organisation (1065026) which does not employ any staff directly; it is run by a committee of elected officers who work in the field of oncology pharmacy, either NHS, private sector or pharmaceutical industry. Committee members are elected for a period of three years, the committee is always chaired by an NHS member. BOPA holds bank accounts which are managed by the treasurer (who is appointed from within the committee) and conducts its business according to the charity regulations, including a public finance report given annual general meeting.

Minutes of the annual general meeting including most recent finance report can be found on the BOPA website at <http://www.bopawebsite.org/publications/committee-documents>.

BOPA has had a partnership arrangement since 2000 with Succinct Medical Communications. The financial undertakings with regard to secretariat function, annual conference and website are provided to BOPA by Succinct under the partnership agreement.

5. About Succinct

Succinct Medical Communications are a medical communications agency supporting the pharmaceutical industry and the NHS. Succinct provides all secretariat support to BOPA membership and annual meetings. Succinct contact details are:

Succinct Medical Communications

The Weighbridge, Brewery Courtyard,

High Street, Marlow,

Buckinghamshire SL7 2FF UK

Telephone: +44 (0)1628 897900, Email: bopa@succinctcomms.com

www.succinctcomms.com

6. Secretariat Functions

Succinct has provided the non-professional secretariat function for BOPA managing the individual and corporate membership. It has always been the agreement that Succinct deliver this cost neutral to BOPA on the proviso that Succinct benefits from the profits made from the annual symposium.

7. Website <http://www.bopawebsite.org/>

Succinct currently host and provide technical support for the BOPA website. The website provides a range of functionality and benefits for BOPA members. BOPA pay succinct a maintenance/service fee for administration of the website. Succinct may not upload any content nor use the website functionality without agreement from the BOPA committee. BOPA committee own the website and its contents.

8. Annual Symposium

The Annual symposium is organised by a subcommittee who are responsible for educational content of the symposium including deciding of the session topics and potential speakers.

Succinct run the BOPA annual educational symposium which includes all administrative functions and staffing cost associated with manning the three day event including but not exclusively:

- booking and paying for conference venue and associated costs, e.g. catering
- administering registration, liaising with hotels to ensure sufficient accommodation
- supporting speakers, e.g. providing session briefs, travel support, speaker fees (see below)

The annual symposium costs are met from attendance fees and sponsorship from individual pharmaceutical companies.

The sponsorship received by Succinct from individual pharmaceutical companies is raised by selling of stands/space in the exhibition hall, selling sponsorship packages and selling satellite symposium which form part of the educational program of the conference.

The sponsorship 'packages' allow sponsors certain benefits in addition to stand space, e.g. advertising in conference material, promotional material in conference bags and company logo's on display at conference etc.

Under the partnership agreement, Succinct run the annual symposium at risk and retain any profits. BOPA does not receive any income from the conference. Succinct provide financial summary statement of symposium costs to the BOPA committee after each conference.

9. Individual Study Days

Throughout the year the BOPA committee will organise additional educational events, for example the introduction to oncology course and one off study days on current topics. The majority of support for these education activities comes in the form of unrestricted medical education grants. The committee members involved will have oversight of educational content. These meetings are usually, but not exclusively, organised by Succinct Medical Communications.

In addition BOPA is sometimes asked to endorse industry organised educational meetings. These are considered on a case by case basis, with any potential conflicts debated by the Executive Committee.

10. E-Learning Materials

The website is host to the BOPA e-learning site <http://www.bopawebsite.org/courses> which hosts e-learning courses, videos of symposium sessions, webinars etc. Developing new materials and maintaining current content is the responsibility of the Education and Training (E&T) sub-committee. The partnership agreement with Succinct will support developing new materials by BOPA with Succinct support securing sponsorship from pharmaceutical industry in the form of unrestricted educational grants to support the E&T sub-committee's annual work plan.

The development of educational content of the modules will be the responsibility of the BOPA E&T committee. A new partnership agreement with Succinct to develop educational materials will allow for development of new innovative projects, such as feedback from international conferences, is being developed. In addition BOPA may look to partner with other third party organisations to deliver novel educational material for its website.

11. Social Media/ Digital

The BOPA committee has a Facebook page and twitter account. Access to the accounts are restricted to selected committee members (decided by committee) and are used only to promote BOPA aims, objectives and position as well as communication of BOPA's activities. BOPA will look to develop a digital strategy in future and may embrace other digital media.

12. BOPA's position on Education supported by the Pharmaceutical Industry

In an ideal world all continuous professional development (CPD) and education for healthcare professionals would be provided and funded by the professions and their employers. Unfortunately in the UK this is not possible so the NHS and specialist professional groups have established a model where they accept and work alongside the pharmaceutical industry to provide education. As a provider of education BOPA recognises that there is on-going debate in medical literature around the role of the Pharmaceutical Industry in supporting education for healthcare professionals^{1,7,8}. The Industry perspective appears to be that they are supporting professionals by ensuring they keep up to date in their current field without a cost of attendance. The ABPI states 'The pharmaceutical industry makes a significant contribution to CPD, through a wide range of activities from practice visits to sponsorship of international meetings. Its principal aim is to ensure the safe and effective use of medicines.'⁹ The ABPI code of practice strictly regulates how the industry can deliver medical education through clause 19; medical and educational goods and services.

BOPA understands this dynamic and believes that BOPA members are educated professionals who attend BOPA educational events and /or access website based e-learning materials to meet CPD requirements and personal/professional development. As oncology pharmacy professionals BOPA members are able to assess and evaluate evidence on cancer medicines and are not likely to be inappropriately be influenced by attending educational event supported by pharmaceutical industry provided the sponsorship complies with ABPI guidance. It is the responsibility of BOPA to ensure the education provided under its name is unbiased.

As can be seen from description of BOPA's educational activities in sections 7 to 11 above, BOPA works with the pharmaceutical industry via a third party medical communications company.

BOPA's educational activities are therefore in part funded by pharmaceutical industry sponsorship.

The educational content of all the activities described above is chosen by members of the committee and appropriate subcommittee members who are responsible for ensuring all content meets the goals of BOPA as an organisation and delivers high quality oncology pharmacy education.

The only exceptions to this are the satellite symposium sessions at the annual symposium. In these sessions the pharmaceutical industry sponsors have input and influence over content. These sessions are clearly highlighted as sponsored sessions and from 2017 will always include a member of the BOPA committee on the organising faculty as a co-presenter or chair to ensure the content is unbiased and fits with BOPAs educational aims. The committee review the applications to host a satellite symposium session before they are accepted onto the conference programme and require the individual companies responsible to be compliant with all ABPI rules.

13. BOPA Committee and BOPA Members Benefits

The BOPA committee do not pay symposium attendance fees as it is deemed they are attending the symposium to work as part of the organisation committee. The BOPA committee funds the accommodation for committee members working at the conference from the BOPA accounts.

Committee members are entitled to claim reasonable travel expenses for travel undertaken on BOPA business, i.e. to attend meetings representing BOPA members or the committee meetings. The majority of committee meetings are via teleconference to reduce travel costs.

All committee members are volunteers and receive no payment or remuneration in kind for their time and activity working on behalf of BOPA members at the symposium or other events. There is no direct or indirect payment from pharmaceutical companies received by committee members.

BOPA's position is that if any committee members speak at symposium including satellite symposium or other BOPA events they must follow NHS and professional guidance^{2,3} and their own employer's policy on managing conflict of interest and declare all payments received (including payments made in their name to a charity) or refuse payment.

If required in the interests of transparency BOPA will publish details of fees paid in its name at the annual symposium. Any members receiving payment must do so on the understanding that BOPA reserves right to share details/ publish information on payments made as required.

14. Declarations of Interest whilst undertaking BOPA committee business

All committee members are present in their capacity as oncology pharmacists/technicians and are not representing their employers. They must therefore not act in direct interests of their employers, ensuring that all potential conflicts of interest are declared. Members will withdraw themselves from discussion and voting on topics where there is a conflict of interest with their employer or any personal or professional interests. The Chair and Vice Chair have capacity to ask a committee member to exclude themselves (including each other) from discussion and decisions if a conflict of interest arises. This applies to email based discussions and decisions as well as at meetings.

15. Hospitality

During the conference and one day educational events, meals and refreshments at conference are provided as part of conference fee. The value is under £25 and therefore does constitute hospitality that has to be declared². The conference Gala dinner is charged as an additional cost when booking. Industry sponsors do not attend the Gala dinner.

16. Payments made in BOPA's Name

During the conference fees are paid to speakers and chairs as below.

BOPA Speakers, (Succinct pays the individuals concerned):

- Honoraria payment of £4.00 per minute for the duration of their session, if there is more than one speaker, this amount is split
- 1 days registration for the day of their session
- 1 nights' accommodation
- Standard travel expenses

BOPA Session Chairs

- No honoraria, accommodation or expenses

Satellite Speakers & Chairs

- Responsibility of the sponsoring company to pay honoraria, accommodation and travel expenses at an appropriate rate under ABPI guidance. The speakers are responsible for their own declarations.

All NHS speakers and chairs at BOPA events are obliged under NHS guidance^{2,3} to declare all fees and expenses received from Succinct or satellite sponsoring pharmaceutical company.

17 References

1. Goldacre B. Bad pharma : How medicine is broken, and how we can fix it. Revised and updated edition. UK: Fourth Estate; 2012.
2. The Telegraph. Pharmaceutical firms paying members of panel which oversees NHS drug procurement 18 Feb 2016. Available at <http://www.telegraph.co.uk/news/nhs/12162032/Third-of-panel-overseeing-NHS-drugs-procurement-being-paid-by-pharmaceutical-firms.html> last accessed 29.06.17
3. NHS England. Managing Conflicts of Interest in the NHS Guidance for staff and organisations. 07.02.17. Publications Gateway Reference: 06419. Available at <https://www.england.nhs.uk/wp-content/uploads/2017/02/guidance-managing-conflicts-of-interest-nhs.pdf> last accessed 29.06.17
4. Royal Pharmaceutical Society. RPS guide for declaring Interests. 31/03/17. Available at <https://www.rpharms.com/resources/quick-reference-guides/declaring-interests> last accessed 2.07.17.
5. NHS Scotland, Standards of conduct, accountability and openness. Available at <http://www.sehd.scot.nhs.uk/publications/NHSScotCodesasatFEB200101A.pdf> last accessed 25.07.17.
6. Association of the British Pharmaceutical Industry (ABPI) Code of Practice for the Pharmaceutical Industry 2016. 17/02/2016
7. Avorn J. Teaching clinicians about drugs--50 years later, whose job is it? N Engl J Med 2011;357:1185-7.
8. Schofferman J. The medical-industrial complex, professional medical associations, and continuing medical education. Pain Med. 2011; 12(12):1713-9.
9. Association of the British Pharmaceutical Industry (ABPI) CPD for Doctors 2013–2023 - Report of a joint ABPI–BMJ conference held at BMA House on 26 June 2013 Available at last accessed 2.07.17.

17 Document Control

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Original Author			
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Owner			
BOPA Committee			
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Draft	Date	Contributor	Summary of Change
1.0	30/06/17	N/A	1st Draft
1.1	15/07/17	BOPA committee & Succinct	Updates on charitable status, typos
12	25.07.17	BOPA Committee	Addition of membership info

Appendix One: Latest Declaration of finances from Charity Commission Website

Available at

<http://apps.charitycommission.gov.uk/Showcharity/RegisterOfCharities/CharityWithoutPartB.aspx?RegisteredCharityNumber=1065026&SubsidiaryNumber=0> last accessed 16.07.17.

Find charities

Find charities

Charity overview

Contact & trustees

Charity framework

View accounts

Print charity details

Advanced Search

Charity search

Enter name or number

Advanced Search

DUE DOCUMENTS RECEIVED

1065026 - THE BRITISH ONCOLOGY PHARMACY ASSOCIATION

Accounts for 31 Mar 2016: **received 16 Jan 2017**

Annual Return for 31 Mar 2016: **received 16 Jan 2017**

Activities

BOPA PROMOTES EXCELLENCE IN PHARMACEUTICAL CARE OF BRITISH CANCER PATIENTS

Where it operates

THROUGHOUT ENGLAND AND WALES
NORTHERN IRELAND
SCOTLAND

Financial history

Year	Income (£k)	Expenditure (£k)
2012	133	67
2013	145	75
2014	145	75
2015	107	69
2016	145	107

Compliance history

Year	Annual return (months)	Accounts (months)	Due date (months)
2012	5	5	5
2013	5	5	5
2014	5	5	5
2015	5	5	5
2016	5	5	5

Financial summary

Financial year end (FYE)	Income	Spending	Accounts received	Annual Return/Annual Update received	View
31 Mar 2016	£145,679	£107,443	16 Jan 2017	16 Jan 2017	Accounts
31 Mar 2015	£107,342	£69,908	12 Jan 2016*	24 Dec 2015	Accounts
31 Mar 2014	£94,868	£75,069	02 Nov 2014	02 Nov 2014	Accounts
31 Mar 2013	£145,950	£133,652	27 Oct 2013	27 Oct 2013	Accounts
31 Mar 2012	£194,778	£168,348	28 Oct 2012	28 Oct 2012	Accounts

* Accounts for 31 Mar 2015 have been qualified.

Appendix Two: Corporate Members Terms of Reference



Corporate Membership Terms of Reference 2017

As a corporate member of BOPA, your company has expressed their willingness to support the philosophy and activities of the association.

This document sets down the criteria for the relationship between your company and BOPA and aims to maintain the independence of the association.

Application for membership may be made at any time through the BOPA website (www.bopawebsite.org), commencing 1st April – 31st March each year.

1. BOPA mailing / emailing broadcast facility

This is made available to corporate members of BOPA, in order to enable them to mail specific items of literature to BOPA members. It is made available no more than three times annually, per corporate member and is subject to the following conditions:

- It may only be used to mail those specific items that are ABPI compliant and that have been approved by the BOPA Executive Committee
- Approval of literature by the committee should not be taken to imply endorsement of any company, product or service by BOPA. Care must be taken not to create this impression in recipients of mail shots or others
- Any offer (e.g. attendance at meetings) made to individual BOPA members using the mailing list, should be made available to all individual members regardless of their place of work or employer
- Once approved, the documents/items can be mailed and/or emailed to all members.
- An administration charge of £750 + vat + postage for postal mailings and/or £250 + vat for emailing will be payable

2. BOPA website

- Unrestricted access to the members section of the website for 10 additional people per corporate member
- Access to the member's forum on the website
- The opportunity to add a URL link to your corporate website from the BOPA website
- Additional collaboration relating to the website will be considered by the committee

3. BOPA Symposium

The symposium is currently organised on a cost-neutral basis for BOPA by Succinct Medical Communications.

Corporate members will receive a priority in applications for:

- Sponsorship opportunities
- Satellite symposia
- Discounts for exhibition space and delegates places at the annual symposium

4. Newsletter

Any newsletters and other members' correspondence will be sent to the primary member of your company.

5. Access to the BOPA Executive Committee

From time to time the committee has acted as a focus group for corporate members in providing opinions and advice on a variety of issues. The committee welcomes approaches from corporate members who wish to work with them in this way. Such approaches should be made to the BOPA chair person, vice-chair person or via Succinct Medical Communications. However, because of time constraints, access to the committee for such purposes cannot be guaranteed

Applications to have access to or work with sub-committees must be made through the BOPA Chair or Vice-Chair person.

6. Sponsorship of BOPA events

Pharmaceutical companies wishing to sponsor events arranged by BOPA will continue to be welcomed on the understanding that the company or any of its representatives will take no official part in the event and may be excluded from certain discussions. The exception will be where an individual representative may be specifically invited to the event because of their specific interest or experience. In such a case, it would be accepted that the views expressed were those of the individual rather than those of the company.

A separate session or promotional stand may be arranged with the company representative if deemed appropriate for the type of event being held.

Events

- May be partly or wholly sponsored by a pharmaceutical company or companies
- Proposals for events, including administrative and financial details, must be presented to the committee for approval
- BOPA will have the final say over programme content and speakers
- Companies may be requested to approach potential speakers if it is felt that they have appropriate contacts
- Content of talks given by company-recommended speakers must be pre-approved by BOPA
- No overtly promotional sessions will be included unless specifically requested by delegates
- The sponsoring company is bound to abide by the ABPI Code of Practice and as such BOPA may request to see any materials produced in relation to the meeting for their individual approval procedures
- BOPA will endeavour to hold events in venues where it is possible for companies to have promotional stands that can be easily viewed by delegates during lunch or coffee breaks; however, this may not always be possible
- BOPA will encourage delegates to visit promotional stands at sponsored events

BOPA Executive Committee - April 2017