



**Code of Conduct Regarding Funding  
for the Best Medicines Coalition and Its Members**

**February, 2014**

**Best Medicines Coalition Mission:**

*The BMC is committed to ensuring that all Canadians have safe and timely access to medications that have been shown, based on best available evidence, to improve outcomes for patients.*

**Overview:**

Funding agreements and ongoing working relationships with corporate interests are integral elements within the current operating environment for Canadian patient groups and consumer advocates. These provide sustainability, knowledge exchange regarding issues, and a valuable framework for the pursuit of common goals.

BMC's development of a Code of Conduct regarding funding reflects a commitment to ensure that the important advocacy activities of the BMC, pursued in support of its mission and goals, as well as the activities of its members, are not jeopardized by potential or perceived conflicts of interest/duty related to funding arrangements or working relationships.

**Principles:**

We have designed the various elements of this Code of Conduct Regarding Funding to encourage and support practices that uphold principles of transparency, integrity, respect, and accountability, allowing the BMC and its members to thrive as strong, credible, and independent advocates for Canadian patients/consumers.

**BMC's Code of Conduct Goals Are To:**

- Ensure that funding arrangements or relationships with funders do not influence or jeopardize the mission, goals, and advocacy activities of the BMC and/or its members.
- Ensure that arrangements and relationships between the BMC, its members, and funders are ethical, transparent, and able to withstand public scrutiny, and that they reflect positively on the BMC, its members, and the funding organizations.
- Ensure that the BMC and its members maintain credibility with key audiences and stakeholders, including government officials, health care professional organizations, the media, and patients/consumers.

- Provide BMC and its members with a solid operating framework and appropriate guidelines so that all may be able to interact more effectively, confidently, and authoritatively with funding organizations.

### **Code of Conduct: Funding Categories**

***Acceptable Funding:*** It is essential that the BMC, its member organizations, and its independent members adopt a thoughtful, balanced, and managed approach to seeking financial support and determining which types of funding formats best serve the organization. Within this context, the following types of funding are acceptable:

- Grants provided without mandatory allocation or restriction to specific activities or projects. The grant may represent broad support for a member's goals and objectives but are unlinked to specific activities or projects.
- Funding to support projects or initiatives conceived and developed solely by members without influence by the funder on content, messaging, or execution.
- When funding for the development and execution of a member's project or event that a funding organization has conceived and presented to a member for consideration, the member must have policies, such as a formal review process, in place to ensure the proposed project serves the member's goals and objectives and reflects the needs of its constituents.
- In-kind support when it is tactical or non-strategic in nature, and therefore there is no risk of influencing a member's strategy, positions, messaging or outreach (e.g., meeting space, equipment, gifts for fundraisers).

***Unacceptable Funding:*** In some cases, certain types of funding formats from funders, which could benefit from patient group/member activities involve a greater level of risk of perception of conflict of interest/duty, thereby compromising the integrity of the organization and its ability to carry out activities that serve its mission and goals. In this context, the following types of funding are unacceptable:

- Funding in exchange for a member's involvement in – or endorsement of – a corporate communications/marketing material, project, or event, where the member has not been involved in conceiving and/or development the material, project, or event (e.g., media releases, patient brochures), when the project does not serve the member's goals and objectives.
- Funding directly linked to promotion of a specific product or category of products, including activities to advance a product that is not be within the usual scope or intent of member's advocacy or patient information activities.
- In-kind support which is strategic in nature or related to the development of a member's overall plan, policy, positions, advocacy tactics, messaging, or outreach (e.g., use of consultants to assist in the development of documents submitted to government bodies and other strategic stakeholders, such as media).

- When funding for a BMC member comes from one corporate entity, which singularly funds the start-up of activities, or the beginning of specific new projects, or ongoing activities, particularly when this funding constitutes the member's sole or primary support.

### **Code of Conduct: Working Relationships**

***Acceptable relationships:*** It is essential that the BMC and its members ensure that their interactions with funders and potential funders are appropriate and uphold principles of transparency, integrity, respect, and accountability. Within this context, the following types of working relationships are acceptable:

- Exchange of information regarding public policy and legislative developments, medical/health issues and other relevant areas using a range of means, including meetings, conferences, emails, and reports.
- Collaboration and partnership on various types of projects (e.g., events, reports), both those initiated by the member or the funder, provided that the projects do not involve the development of strategy and positions and that the activity is in line with previously established goals and objectives.

***Unacceptable relationships:*** Some types of working relationships present a higher risk of potential conflict of interest, such as the following, which are unacceptable:

- Using the assistance of funders, including their employees or consultants, to create a patient group or support an independent member, when the funder is directly involved in setting up meetings, facilitating connections and communications, as well assisting members in developing strategy, positions, advocacy tactics, messaging, and outreach plans.

### **Code of Conduct: Ensuring Independence**

In the management of funding arrangements and working relationships with funders, guidelines, policies, and procedures must be in place to ensure that members develop independently all strategy, positions, messaging, and outreach plans, thereby safeguarding against influence from funders and negating perceptions of conflicts of interest/duty. Examples of such practices include:

- Funder representatives should be excluded from patient group boards or committees, except where the committee mandate is limited and unrelated to development of strategy, positions, advocacy tactics, messaging, and outreach plans.
- Limiting funder participation at meetings where members are developing positions and strategies.

### **Code of Conduct: Funding Acknowledgement**

In the interests of transparency and accountability, the BMC and its members must adopt clear and consistent communication methods regarding funding sources, including unrestricted grants, project funding, and in-kind support or services. The following are acceptable and appropriate forms of acknowledgment:

- Communication of all funding sources in annual reports to its members/constituents.
- Identification of funders on relevant materials, including websites and conference or event materials.

### **Adoption and Enforcement of Code of Conduct:**

Current and prospective members must review and accept BMC's *Code of Conduct Regarding Funding* and confirm to the BMC that their practices are in adherence. BMC members are responsible for communicating these policies within their organizations. Members will be required to recommit to the *Code* on an annual basis.

If anyone brings to the attention of the BMC staff or Board a member's violation of the *BMC Code of Conduct*, the BMC Executive Director will confidentially ask the member to provide an explanation and revise its practices, if necessary. If the violation is not resolved, the Executive Director will refer the matter to the BMC Board of Directors to take appropriate action, as outlined in BMC's By-laws.