

Involvement of pharmaceutical companies, device companies and other commercial organisations providing healthcare products

1. Introduction

These guidelines relate to the involvement of commercial organisations involved in producing, marketing, re-selling or distributing healthcare goods or services consumed by or used on patients in Federation-approved CPD. These organisations include:

1. Pharmaceutical companies
2. Device companies (manufacturers or distributors)
3. Biotechnology companies
4. Growers, distributors, manufacturers or sellers of medical foods and dietary supplements
5. Manufacturers of health-related wearable products
6. Reagent manufacturers or sellers
7. Companies developing or marketing health-related IT solutions

Federation CPD approval criteria

These are listed in the guidelines for each type of CPD on the website <http://www.thefederation.uk>. One of the longstanding criteria is that 'Any support, sponsorship, funding or involvement by commercial organisations must not influence the structure or content of the (educational) programme'.

Definitions

From this point, within this document the phrase '**Commercial organisation**' refers to the commercial organisations listed in the first paragraph. The phrase '**Educational programme**' refers to the educational content of a live, live-streamed or on-demand meeting, including the introduction to the meeting and its sessions. The term '**Published programme**' refers to the document listing the sessions that is available prior to the meeting whether in hard copy or electronic format.

2. Provision of approved CPD

With effect from 12th September 2022, the Federation will no longer accept applications for CPD approval that come directly from pharmaceutical companies, device companies and other commercial organisations that provide healthcare products used on patients. Where an event is provided by one of these companies it will no longer be eligible for Federation CPD approval. This approach is to bring the Federation in line with one of the standards published by the International Academy of CPD Accreditation (IACPDA) in 2020 and is also in line with other accrediting bodies in North America and Europe.

With effect from 1st January 2024, the Federation will no longer accept applications for CPD approval from advertising, marketing or communication companies whose clients are pharmaceutical companies, device companies and other commercial organisations of the types listed in section 1 of this document.

For clarity, applications for CPD approval from other providers where there is sponsorship from a pharmaceutical company, device company or other commercial organisation providing healthcare products (or more than one of these organisations), will still be considered for review. The sponsorship must be declared.

3. Sponsorship

Where funding or other support is provided by a commercial organisation other than the provider, it must be declared in an application for CPD approval. The funding should be in the form of an (unrestricted) educational grant so that the content and structure of the CPD is completely independent of the organisation providing the funding.

The Federation does not approve CPD that has been sponsored by tobacco companies or other industries whose products adversely affect human health.

Additional points:

1. Where funding is provided by a single organisation other than the provider (a single sponsor) there should be a programme director or programme committee chairperson who is completely independent of the organisation providing the funding.
2. Commercial organisation(s) providing funding to the CPD provider must not pay speakers or authors directly or pay personal expenses to those attending the CPD (eg an honorarium, travel expenses, registration fees or accommodation).
3. Organisation(s) providing funding to the CPD provider must play no part in the selection of speakers or (for e-learning) authors.
4. The organisation(s) providing funding must not be provided with the contact details of the delegates.

4. Live and streamed events, including events accessed 'on demand'.

There should be no advertising or promotional activity during the educational programme at approved educational meetings. Commercial stands and advertising should be located outside the lecture theatre or educational rooms at live events. Similarly, with streamed events and webinars, any promotional activity or advertising should be separate from the education and should not be visible during the educational programme. Learners should not be required to attend promotional activity. Where an event (live, streamed or 'on demand') has been sponsored by a company it is appropriate to disclose this early in the presentation but not repeatedly during an individual presentation. The disclosure should be a simple statement informing delegates that the event has been sponsored by the company concerned. A similar disclosure is also allowed on the published programme document. The font size should be no larger than 12.

Events where the name of a sponsor is included in the title of the event

These will not be approved.

Speakers and facilitators from commercial organisations

Approved events must have no speakers or facilitators from commercial organisations (as defined in section 1 above). The only exceptions to this would be for speakers where both A and B below are satisfied:

A. The meeting is organised by an independent non-commercial educational provider. These would include recognised UK or European Specialist Societies, UK University Experimental Medicine Departments and UK Royal Colleges. The meeting is hosted in the UK.

B. One of the following criteria applies to the speaker concerned:

1. The topic is a recognised area of expertise for the speaker and the content of the talk is not related to the business lines or products of their company, **or**

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2. The content of the activity is limited to basic science research, such as preclinical research, drug discovery, or the methodologies of research, and the speaker does not make care recommendations.

Where a provider includes a speaker from a commercial organisation, they should submit a Commercial Speaker Declaration signed by the speaker concerned.

Use of commercial organisation logos during approved education

With effect from 1st January 2022, the Federation will not permit the use of commercial organisation logos or product logos during the educational programme at approved educational meetings. With live, streamed and 'on demand' events, commercial organisation logos are permitted in the areas outside the educational programme itself.

Use of logos on published programmes for events

The Federation advises against the use of commercial organisation or product logos on published programmes for events. Applications with published programmes dominated by large commercial logos will not be accepted. All information relating to sponsors other than a simple disclosure statement informing delegates that the meeting has been sponsored by the pharmaceutical company (or companies) concerned (including, for example, the list of exhibitors) must be clearly separated and distinguished from the scientific/educational components of the programmes and identified as such.

Websites hosting streamed and 'on-demand' events

The event (live, streamed or 'on demand') cannot be hosted on a sponsor's website.

Sessions sponsored by Commercial Organisations

'Industry sessions' where a session at a meeting is sponsored by a specified commercial organisation (as defined in section 1 above) will not be approved by the Federation. Such sessions must be clearly identified as not having Federation Approval. The main scientific programme may include the title of the session and the fact that is sponsored by the commercial organisation concerned (the organisation name can be included). It should state that the content has not been approved by the Federation of the Royal Colleges of Physicians, there should be no other text relating to the session. The programme for the sponsored session must be published separately from the main scientific programme.

5. Distance learning

Distance learning includes e-learning modules, e-platforms, e-libraries, podcasts and all other forms of distance learning approved by the Federation. There should be no advertising by commercial organisations in the distance learning material. Where distance learning material has been sponsored by a commercial organisation (as defined in section 1 above), it is appropriate for a simple disclosure statement to this effect early in the distance learning material. The font size should be no larger than 12.

Commercial organisation and product logos

The logos of sponsoring companies and product logos will not be allowed either on the part of the distance learning programme that lists the educational content or in the educational material itself.

Websites hosting distance learning material

The distance learning material cannot be hosted on a sponsor's website.

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Distance learning authors and editors from commercial organisations

Approved e-learning must have no authors or editors from commercial organisations (as defined in section 1 above). The only exceptions to this would be for authors where both A and B below are satisfied:

A. The e-learning is organised by an independent non-commercial educational provider.

These would include recognised UK or European Specialist Societies, UK Universities and UK Royal Colleges. The e-learning must be developed in the UK.

B. One of the following criteria applies to the author concerned:

1. The topic is a recognised area of expertise for the author and the content of the e-learning is not related to the business lines or products of their company, or
2. The content of the e-learning is limited to basic science research, such as preclinical research, drug discovery, or the methodologies of research, and the author does not make care recommendations.

Where a provider includes an author from a commercial organisation, they should submit a Commercial Author Declaration signed by the author concerned.

Please note

The CPD approval process provided by the Faculty of Pharmaceutical Medicine (FPM) is a different process from the approval process provided by the Federation of the Royal Colleges of Physicians of the UK, with differing approval criteria. The governance of the FPM CPD approval process is provided by the FPM and is independent of the Federation of the Royal Colleges of Physicians.

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