

DRAFT

**Guidelines for the Relationship between the Faculty of Dentistry
and Health Related Industries**

**This Guideline aims to augment the
*Conflict of Interest Policy of
Dalhousie University***

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(This has been adapted from the Faculty of Medicine's Conflict of Interest Policy)

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1. Executive Summary

Dalhousie University's mission is "Teaching and Learning, Research and Service" to patients of the Maritimes. This mission is fulfilled through diverse activities. Uniform use of the Dalhousie University "brand" in work affiliated with industry should be recommended to maintain their value. More and more, universities interact with a range of health-related industries (pharmaceutical, dental devices, health supplies, advocacy groups, government, not-for-profits organizations, disease related funding agencies, advocacy groups and health services may all be biased due to their own agendas). The need to address these relationships has been identified by health organizations and industry associations alike.

Dalhousie University has a Conflict of Interest (COI) policy that applies to all staff and faculty of the institution. The Faculty of Dentistry has developed these guidelines to serve as a resource to guide well-managed relationships with industry to address the unique relationship between health science and industry and to augment the COI policy of the university. This document is not intended to discourage appropriate interactions, as the benefits of these relationships are recognized. However, the health industries also have a fiduciary duty to their shareholders that requires them to promote their products to dental professionals. These guidelines promote consistent approaches for the various constituencies of the Faculty of Dentistry including undergraduates, postgraduates, graduate students, postdoctoral fellows, dental scientists, and faculty. The objective is to develop practices to avoid conflict of interest and to promote a commitment to scientific methodology, evidenced-based information and professionalism.

2. Preamble

Dalhousie University's mission is "Teaching and Learning, Research and Service". This mission is fulfilled through diverse activities – and increasingly so. Uniform use of the Dalhousie University "brand" in work affiliated with industry should be recommended to maintain their value. More and more, universities interact with a range of health-related industries (pharmaceutical, dental devices, health supplies, advocacy groups, government, not-for-profits organizations, disease related funding agencies, advocacy groups and health services may all be biased due to their own agendas). The need to address this relationship has been identified by dental organizations and industry associations alike.

The following guidelines have been developed by the Faculty of Dentistry, Dalhousie University, to serve as a resource to guide well-managed relationships with industry (as defined above). This document is not intended to discourage appropriate interactions, as the benefits of these relationships are recognized. The health industries make significant contributions to dental education at Dalhousie University and there are many examples of positive partnerships. However, the health industries also have a fiduciary duty to their shareholders that requires them to promote their products to dental professionals. Industry marketing approaches can be direct or indirect, there are a variety of different regulations within the groups mentioned above, and it is important to understand the related issues.

These guidelines promote consistent approaches for the various constituencies of the Faculty of Dentistry including undergraduates, postgraduates, graduate students, postdoctoral fellows, dental scientists, and faculty. The objective is to develop practices to avoid conflict of interest and to promote a commitment to scientific methodology, evidenced-based information and professionalism.

It is important to note that these guidelines are not a substitute for Dalhousie University policies, including "Policy on Conflict of Interest" and "University Purchasing Policy." All university members must comply with these policies.

Dalhousie University Policy on Conflict of Interest

https://cdn.dal.ca/content/dam/dalhousie/pdf/dept/university_secretariat/policy-repository/ConflictInterestPolicy.pdf

Dalhousie University Procurement Policy

https://cdn.dal.ca/content/dam/dalhousie/pdf/procurement/Pur_Policy_April_12.pdf

3. Guiding Principles

The primary objective of professional interactions with health industries is the advancement of health care for patients and education for students.

While substantive, appropriate, and well-managed interactions with industry are vital to public health, these activities should be conducted in a way that is principled and upholds the public trust. Clear and well thought-out guidelines will optimize the benefits inherent in the relationship between academic dentistry and industry and minimize the risks.

These guidelines apply to all individuals affiliated with Dalhousie University Faculty of Dentistry whether in Dalhousie facilities or off-campus, including meetings and conferences, clinical and other milieus that are supported in whole or in part by industry.

The absence of a guideline on any specific industry funding practice does not imply endorsement. Professionalism, as an individual responsibility, is the guiding principle for all types of activities that relate to dental education at all levels, whether or not there is a stated guideline that specifically applies to the situation.

4. Gifts to Individuals

Dalhousie University Faculty of Dentistry faculty, staff, residents and students should not accept personal or group gifts (other than Faculty approved donations to a research or education program) from industry representatives regardless of the nature or value of the gift. This includes any gifts, payments, services, privileges or favours from equipment and service providers as well as pharmaceutical and device providers. (See also “**10. Food**”). Personal or group gifts not approved for research or education programs should be reported to the University (See “**15. Disclosure of Relationships with Industry**”).

5. Distribution of Samples

Dalhousie University faculty, staff, residents and students must abide by established policies and procedures of the affiliated health care centres in regard to distribution of samples. The distribution of clinical evaluation packages, including samples, should be centrally managed in a manner that ensures timely patient access to optimal therapeutics throughout the health care system.

If central management is not feasible, alternative ways to manage sample distribution should be developed to avoid risks to professionalism. It is acknowledged that the handling of samples should be efficient and not overly bureaucratic.

Attention to the provision of medications at a reduced cost for hospitalized patients and the implications for potential ongoing costs to patients or their insurers should be clarified.

The distribution of samples should not involve any form of material gain for the dentist or for the dentist's practice.

6. Site Access by Industry Representatives

Faculty, staff, residents and students must abide by established policies and procedures of the affiliated health care centres with regard to meetings with industry representatives. In general, access by industry representatives should occur in areas that are separated from direct patient contact. Representatives may provide in-service training or assistance on devices or equipment in patient care areas if there is appropriate consent by the patient or surrogate.

Industry representatives are to be appropriately registered with the affiliated health care centre as required by institutional policy and meetings should take place only by appointment or by invitation.

Involvement of residents and students in meetings with industry representatives should occur under the supervision of a faculty member for educational purposes only (e.g., demonstration of a proprietary device made by private industry to ensure safe use in patient care).

7. Continuing Professional Dental Education (CPDE)

All CPDE programs involving Dalhousie faculty, and that are planned at Dalhousie grounds or implying direct connection to Dalhousie University, are under the oversight of the CPDE Committee. This oversight includes vetting and approval for external support (including industry). Programs must comply (at a minimum) with the guidelines developed by the CPDE office.

- Financial independence from industry for the CPDE office must be maintained. This removes any sense of financial incentive in planning events. Topics identified through CPDE as requiring assessment will receive equal attention regardless of funding availability. Industry supported continuing education courses should be provided through unrestricted educational grants. Industry cannot provide any direct financial support to the speakers of a CE course.
- Audit mechanisms are to be developed to assure compliance with standards such as those established for the ADA CERP recognition requirements, including content validation and support of meals.
- The Office of Continuing Professional Dental Education, through its committee(s) are to review content for bias prior to all educational events that they provide or review for CPDE credits.
 - Requests for industry support and receipt/administration of funds for CPDE activity should be coordinated and monitored centrally through CPDE office in the Faculty of Dentistry. As the term "unrestricted educational grant" can be problematic, the

program objectives for all funded events must be congruent with those of the CPDE office. The CPDE committee or its subcommittees must determine course content independently of industry sponsors.

- The term “satellite symposium” should be restricted to industry sponsored non-accredited events as it is open to interpretation. These events must not be advertised with, or considered part of, a CPDE approved event. Tagging segments of an educational event as provided by an industry is not acceptable.
- A learner registration fee for all educational events is recommended. Providing quality CPDE is a time and resource-intensive endeavor and this must be recognized and valued.

8. Participation in Industry-Sponsored Programs, Advisory Boards, and Consulting

Individuals affiliated with Dalhousie Faculty of Dentistry may be approached by industry representatives and asked to become members of advisory or consultation boards, or to serve as individual advisors or consultants for various aspects of business operations, including but not limited to product development, research programs, dental/scientific and marketing issues. These individuals should be mindful of the potential for this relationship to influence decision making (e.g. in research or prescribing activities).

When participating in advisory and consulting boards:

1. The exact deliverables of the arrangement should be clearly set out and put in writing in the form of a contractual agreement. The purpose of the arrangement should focus on imparting specialized medical knowledge that could not otherwise be acquired and should not include any promotional or educational activities on the part of the company itself.
2. Full transparency and disclosure is required when participating in such programs, and payments are to be only at fair market value and should take into account the complexity of the involvement.
3. Whenever possible, meetings should be held locally or as part of a meeting which would normally be attended. When these arrangements are not possible, basic travel and accommodation expenses may be reimbursed. Meetings should not be held outside of Canada, with the exception of international boards.
4. University members must be in compliance with the Dalhousie University “Policy on Conflict of Interest.” This policy should be reviewed and ideally would require full disclosure, to the university, of income or other benefits received from industry including expense reimbursements.
5. Faculty should be discouraged from speaking at industry-sponsored non-accredited events.

The Faculty of Dentistry discourages faculty, residents and students from:

1. Attending non-accredited industry events billed as CPD.
2. Accepting payment for attendance at industry-sponsored meetings.

3. Accepting personal gifts from industry at such events.
4. Accepting a speaker fee at such events.

9. Industry-Sponsored Scholarships and Other Educational Funds for Trainees

All scholarships or other educational funds from industry should be given centrally to the administration of the affiliated health care centre or Faculty of Dentistry.

There is no implicit or explicit expectation that the participant must provide something in return for participation in the educational program.

The evaluation and selection of recipients of such funds should be the sole responsibility of the academic dental centre or university office/department, with no involvement by the donor industry.

10. Food

With the exception of modest meals and refreshments provided in connection with accepted programming as outlined above, industry-- supplied food and meals are considered personal gifts and should not be permitted or accepted within academic dental centres. The same standard of behaviour should be met off-site. As a guideline, these should align closely with the Faculty of Dentistry reimbursement policy limits.

<https://www.dal.ca/dept/financial-services/For-Staff-and-Faculty/travel/per-diem-rates.html>)

11. Professional Travel

Faculty, staff, residents and students should not directly accept travel funds from industry, other than for legitimate reimbursement or contractual services. Exorbitant travel arrangements of accommodations are considered gifts from industry and are discouraged. (See also "7. Participation in Industry---Sponsored Programs, Advisory Boards, and Consulting") As a guideline, these should align closely with the Faculty of Dentistry reimbursement policy limits.

<https://www.dal.ca/dept/financial-services/For-Staff-and-Faculty/travel/per-diem-rates.html>)

12. Ghostwriting

Presentations, publications, slides or media products of any kind, oral or written, should not be ghostwritten by any party, industry or otherwise. To be listed as an author indicates responsibility for the content and meaningful participation in preparation of the document. Appropriate authorship and contribution should be noted for materials prepared for someone other than the presenter.

Transparent writing collaboration (with attribution) between academic and industry investigators, dental writers, and/or technical experts is not ghostwriting.

13. Purchasing

Any personal or family financial interests (as defined by the university's conflict of interest policy) in any particular manufacturer of pharmaceuticals, devices or equipment, or any provider of services, should be disclosed according to the Dalhousie University "Policy on Conflict of Interest" and Dalhousie University "Purchasing Policy". They should also disclose any research or educational interests they or their department have that might substantially benefit from the decision.

14. Industry Support for Research

A prerequisite for faculty, staff, residents and students participation in research activities is that these activities are ethically defensible, socially responsible and scientifically valid. All faculty, staff, residents and students, who participate in the design and conduct of Industry funded research shall ensure that there is a signed agreement which is satisfactory to the researcher, the Industry partner, and the institution(s) where the research will be conducted. Agreements must include any "special pricing" that will be granted for inclusion in promotional materials or media events. All research projects involving human subjects are to be approved by the appropriate Research Ethics Board of the University and/or affiliated hospital to comply with Tri-council policies.

Research grants should not be accepted or utilized to support research unless it is carried out objectively for the purposes of the advancement of scientific knowledge or clinical efficacy. Faculty, staff, residents and students should not enter into agreements that limit their right to publish or disclose results of the study or report adverse events which occur during the course of the study. Exceptions may occur where there is a narrow time window and in these cases, there must be consultation with Dalhousie legal counsel prior to engaging in the work. Without these agreements, trainees must be excluded from this work.

Remuneration for participating in research studies may cover reasonable time and expenses and should be approved by the relevant research ethics board. Finder's fees, whereby the sole activity performed by the faculty or staff is to submit the names of potential research subjects, are not acceptable.

For further policy requirements regarding research ethics, below is the link to the research ethics pages for Dalhousie University. More information may be available through any of the following: Nova Scotia Health Authority, IWK Health Centre, Mi'kmaq Ethics Watch and Dalhousie University.

http://researchservices.dal.ca/research_1482.html

15. Disclosure of Relationships with Industry

Faculty and staff should disclose relationships with Industry to his or her Department head or supervisor on an annual basis, or when changes in Industry relationships occur. This should be part of the annual performance review completed by department heads, Associate Deans and unit leadership.

The presence of relationships with Industry should be disclosed by faculty or staff, both verbally and by way of a slide, to learners prior to any educational activity such as lectures, seminars or workshops. Information provided in this manner includes the name of the individual, the name of the commercial interest, and the nature of the relationship the person has with each commercial interest. Information that an individual has no relevant financial relationship should also be disclosed in advance to the learning audience.

Whenever possible, speakers should disclose to the Associate Dean of CPE any potential conflict of interest prior to the educational event.

Disclosure slides should be mandatory for all accredited CPE speakers.

In scholarly publications, individuals should disclose their related financial interests in accordance with the International Committee of Medical Journal Editors.

(<http://www.icmje.org>)

Individuals leading research which involves human subjects should inform participants if the researcher will receive a fee for their participation and by whom the fee will be paid. In addition, individuals may not conduct research with human subjects if they or their immediate family have a significant financial interest in an existing or potential product or a company that could be affected by the outcome of the research. Exceptions may be permitted if it is determined that an individual's participation is essential for the conduct of the research and an effective mechanism for managing the conflict and protecting the integrity of the research has been established.

16. Education Regarding Interactions with Industry

The Faculty of Dentistry will develop appropriate educational materials and methods to build critical evaluation skills, including an understanding of the social psychology, to reinforce high individual and institutional standards, norms and behaviours.

17. Review of Guidelines

These guidelines will be reviewed one year after adoption, and every three years subsequently.

18. Related Documents

1. ADA CERP (Continuing Education Recognition Program): Recognition Standards and Procedures April 2019
[https://www.ada.org/~media/CCEPR/files/cerp_standards.pdf?la=en](https://www.ada.org/~/media/CCEPR/files/cerp_standards.pdf?la=en)
2. Dalhousie University, Policy on Conflict of Interest
https://cdn.dal.ca/content/dam/dalhousie/pdf/dept/university_secretariat/policy-repository/ConflictInterestPolicy.pdf
3. Dalhousie University Purchasing Policy
https://cdn.dal.ca/content/dam/dalhousie/pdf/procurement/Pur_Policy_April_12.pdf