

The Allergy Academy Code of Conduct for Interactions with the Commercial Sector

Summary

The King's College London Allergy Academy (the 'Academy') provides translational education in the recognition and management of patients with allergic disease.

This Code sets out policy and provides guidance regarding professional, ethical, and transparent working relationships between the Allergy Academy staff, healthcare professionals, teaching faculty participating in Academy events, and the commercial sector. For purposes of this Code, the commercial sector is broadly defined as pharmaceutical/diagnostic/device companies, the food industry, grocery stores, or retail entities selling healthcare goods, services, or products related to the allergy field (e.g. supplements, air filters, skin creams, etc.). The Academy reserves the right to assess on a case by case basis if an organisation falls under the definition of the commercial sector, and thus is subject to the guidelines outlined in this Code.

The Academy may solicit various types of industry support from the commercial sector, including:

- **Exhibition Fees**

Exhibition refers to space provided by the Academy to the company, in exchange for a fee, for the purpose of marketing the company's products or services to participants.

- **Sponsorship of Promotional/Marketing Activities**

Sponsorship support is any funding provided in return for a promotional/marketing opportunity offered by the Academy. This includes advertisements, bag inserts, tote bags, lanyards, etc. Satellite symposia organised by industry are also included in this category.

- **Educational Grants**

Educational grants solicit financial support from a company in a 'hands-off' manner with no items of value being offered in return by the Academy. Grants are generally procured via the company's online grant submission process or via the medical affairs department. The Academy will solicit educational grant funding separate from 'fee for service' support opportunities such as sponsorships or exhibition fees.

- **In-Kind Support**

In-kind support is any material, non-monetary, item provided in support of an educational activity, such as durable equipment/devices, disposable supplies, food products, etc.

The Allergy Academy

(the 'who')

Educational Events and Resources

The Allergy Academy is a collaborative initiative run from the Department of Paediatric Allergy within the Department of Women and Children's Health of the Faculty of Life Sciences and Medicine of King's College London. The Academy provides educational resources and events for a diverse range of learners including specialists, general practitioners, hospital doctors, nurses, dietitians, paediatricians, and patients. The Academy provides best practice care guidance for the clinical management of asthma, allergic rhinitis, food allergy, nutrition, and skin presentations of allergic disease, as well as more specialist topics, as identified.

Educational training events range from large scale flag-ship specialist educational events, to primary care regional training days, and focused practical workshops. Current educational events and resources can be viewed on the Allergy Academy website at <http://allergyacademy.org>.

Leadership

The Allergy Academy supports an Allergy Academy Administrator on a permanent basis as well as a rotating twelve-month Clinical Education Fellow post to be taken up by a qualified doctor who is undertaking specialist training in paediatrics. The remaining Academy staff comprise NHS-employed professionals. Two paediatric allergy consultants take the role of directing the Academy as a partnership with a third providing leadership for the multidisciplinary aspects of the events. These three clinical consultants are based within the Children's Allergies Department at St Thomas'

Hospital and contribute regular timetabled sessions through their working week to running educational activities. The Academy also involves a wider range of multi-disciplinary professionals as part of the formal teaching faculty. These professionals work within the Allergy Service of Guy's and St Thomas' Hospital NHS Foundation Trust and provide teaching expertise on a collaborative basis for individual events.

Code Applicability

All Academy staff who present, teach, and/or plan the Allergy Academy activities are expected to uphold the professional standards outlined in this Code, as well as upholding those standards in accordance with their profession's collegiate guidance where applicable. This also applies to invited speakers and faculty from other institutions. The directors of the Academy are responsible for the maintenance of this Code of conduct. Professionals who work within the Academy have a collective responsibility for facilitating this process, and any processes for appraising individual's conduct will be relayed towards line-management structures (see Complaints Process on page 6).

Summary of Principles

(the 'why/what')

This Code outlines principles and procedures for organising high-quality medical education that is evidence-based, independent, and free from commercial bias. The Academy's interactions with the commercial sector will be transparent and ethical and in line with current guidance as provided by:

- The Prescription Medicines Code of Practice Authority (PMCPA) guidance which administers the [Association of the British Pharmaceutical Industry's \(ABPI's\) Code of Practice for the Pharmaceutical Industry](#)
- [The Association of British HealthTech Industries Code of Business Practice](#) (ABHI)
- [MedTech Europe Code of Ethical Business Practice](#)
- [European Federation of Pharmaceutical Industries and Associations Code on the Promotion of Prescription-Only Medicine to, and Interactions with, Healthcare Professionals](#) (EFPIA)
- [The Medicines and Healthcare Products Regulatory Agency's 'Blue Guide'](#)
- [Best Practice Guidance on joint working between the NHS and pharmaceutical industry and other relevant commercial organisations](#) (Prepared by: Medicines, Pharmacy and Industry Group)
- Code of Conduct; Code of Accountability in the NHS
- [Financial and commercial arrangements and conflicts of interest, General Medical Council](#) (GMC)
- [International Committee of Medical Journal Editors guidance](#) (ICMJE)
- [General Data Protection Regulation](#) (GDPR)
- [Baby Friendly Initiative](#)

Policies/Procedures

(The 'how')

Educational Planning and Evidence-Based Content

The Academy promotes best health care practice through the delivery of evidenced-based education, resources, and well-established national and international guidance. Events are designed in response to recognised educational needs. From educational design to implementation, all elements, including topics, content, learning objectives, formats, target audience, etc. are managed by the Allergy Academy planning team, independently of influence from the commercial sector. Development of new initiatives and research activities will be maintained within the practice of Good Clinical Practice and will not compromise service management or standards of care for any patients who are treated within affiliated NHS departments.

In certain circumstances, the Academy may plan an educational event in response to a request from industry. In such a case, the company may request a theme, topic, or potential target audience only. Beyond this, the Academy manages all elements of the event planning and implementation in the same way it does for all its educational activities; with the guidelines and standards outlined herewith being strictly upheld.

Personal Conflicts of Interest and Disclosure

The Allergy Academy is committed to ensuring balance, independence, objectivity, and scientific rigor in all of its educational activities. Accordingly, those in control of the educational content will disclose all relevant relationships with the commercial sector that they have had within the past 12 months. Disclosure information is thoroughly evaluated and all conflicts of interest are resolved via several methodologies, including peer review of content, onsite monitoring, etc. Disclosure of this information is made to participants prior to the educational activity in the programme booklet, on the event website, and verbally/with a slide at the beginning of each educational session. Discussion of unlabelled use of a

therapeutic product, or the investigational use not yet approved, is also disclosed. Practically, this process can be broken into three stages:

1. Disclosure/Identification of Conflicts of Interest (COI)

- Who: planning committee, faculty, and any others directly contributing to the content
- What: relationships (financial or other) with the commercial sector, directly or indirectly related to the content of the educational activity, over the past 36 months
- How: written via the Academy disclosure form, email, or other documentation detailing relationships; verbal disclosure is also allowed, although written is preferred

2. Management of Conflicts of Interest

The Academy conflict of interest management process includes an attestation (included in the disclosure form) on the part of all educational collaborators that they will adhere to the following:

- I will not include promotional content of a commercial entity (includes product/trade names, photos, logos, company names, etc.).
- I will use scientific/generic names. Trade names should be used only once if absolutely necessary for educational clarity. If more than one company makes the product, all applicable trade names should be identified.
- I will not allow any industry representative(s) to influence the CME/CPD content in any way.
- I will not include any patient protected health information; materials will be de-identified.
- I will include the disclosure slide and verbally disclose the above information at the beginning of each presentation; even if nothing to disclose.
- I will notify the Allergy Academy immediately of any changes to the above.
- I will submit my presentation(s) in advance for peer review; all presentations will be monitored onsite for compliance.

Further, disclosure and conflict of interest information is reviewed by the planning committee. All identified conflicts of interest must be resolved via several modalities prior to the activity, including:

- Reminder of guidelines for independence
- Reminder that learners will be evaluating the presentations for independence
- Shift the focus of the speaker's presentation from the area with conflict of interest to one without
- CME/CPD credit revoked for presentation(s)
- Peer review of content prior to activity (changes made, if necessary for compliance)
- Additional on-site monitoring of activity by the moderator

3. Communication/Disclosure to Learners

Communication of disclosure information and conflicts of interest will be presented to the learners prior to the activity. Various mediums for disclosure include:

- Event website
- Programme booklet
- Verbally from the podium along with inclusion on the first slide of the presentation (template provided to all speakers)

Multi-Sponsored Events and Company Participation

The Academy is committed to impartiality between companies and does not recommend or endorse specific products, services, or events supported by only one company. The Allergy Academy solicits and benefits from a wide range of industry sponsors who compete mutually within the allergy market. This range of sponsors allows representation across a choice of products and services in many areas, allowing the Academy to curate impartiality between these sponsors.

- An emphasis on using generic drug and product terms and maintaining impartiality between competing products underpin the principles for best-practice and evidence-based-medicine when applied across a wide range of regions and commissioning bodies. As such:
 - Educational content will avoid discussing any specific brand names, unless there is an integral technical difference for the purposes of clinical practice.
 - For teaching purposes, individual products may be discussed where differences between pharmaceutical agents, devices, or investigations are of pertinence in clinical practice.
 - The Academy requests that the generic name for products should be used primarily, unless the use of the branded product name is required in order to effectively communicate principles of practice.
- The Academy may provide a supporting company with a limited number of brochures for audience generation

only, but this is never the sole marketing method (others include direct mail, email promotions, etc.).

- Although Academy initiatives will be open to multiple industry supporters, in the cases where only one sponsor is secured, the same standards of independence from industry influence will be maintained throughout the planning and implementation.
- Jointly funded events with the commercial sector will only be endorsed where there is rigorous governance of the educational content by the Academy. However, such events will not be CME/CPD accredited by the Academy.
- Note, an exception to these guidelines is when a company requests a private round-table meeting (for example, advisory board) in order to gain access to clinical opinion leaders to discuss a specific topic. These events are private meetings facilitated by the Academy in partnership with a single company and are not made open to other professionals. Therefore, they do not fall under the purview of this Code requiring impartial representation or governance regarding educational content.

Separation of Commercial Sector Activities from Academy Educational Activities

Arrangements for company exhibits and promotional/marketing activities will not influence the CME/CPD educational planning or content. All such activities will be clearly separated from the Academy educational elements. Practically, the Academy enforces the following.

- **Separation of Promotional Activities from the Physical Space and Place of the Educational Activity**
 - Absolutely no promotional activities will be permitted in the same room during a CME/CPD session.
 - At least 10 minutes will be allotted before/after any industry sessions in order to clearly distinguish the commercial session from the accredited CME/CPD session. Participants should be clearly notified of this distinction.
 - Exhibit materials must be in a room or area separate from the education, and the exhibits must not interfere or in any way compete with the learning experience.
 - All promotional activities including interviews, demonstrations, and the distribution of literature or samples must be made within the exhibitor's space only; canvassing or distributing promotional materials outside the exhibitor's rented exhibit space is not permitted.
 - Specific times are established for exhibit viewing and/or other promotional activities (including industry-organised satellite symposia).
 - Food and beverage may be served in the exhibit hall in order to encourage interactions between attendees and exhibiting companies.
 - The decision to engage with the sponsors during the refreshment breaks is at the discretion of the individual delegate; using their own clinical and scientific judgement to evaluate evidence presented to them.
- **Separation of Promotional Activities from the Educational Materials**
 - The Academy does not include any product promotional information in its educational materials that are used to support learning during a CME/CPD activity (copies of slides, handouts, abstracts, etc.).
 - Exceptions to this include:
 - The required commercial support disclosure
 - Logistical information such as the time/location of industry-organised satellite symposia, exhibitor listing, etc.
 - Promotional information is only allowed in logistical support materials (programme booklet, tote bag, etc.). Promotional materials in the programme booklet will be grouped in a section in the back of the program. Advertisements will be allowed on the back cover.
- **Satellite Symposia Guidelines**
 - Any educational session directly influenced or organised by industry will be considered an industry-organised satellite symposium.
 - Separate times for such events will be made available; not competing with educational sessions.
 - These sessions will not be designated for CME/CPD credit under the Academy event credits.
 - The event programme booklet produced by the Academy and any promotional/marketing materials produced by the sponsoring company will clearly identify the satellite symposia by including:
 - 'Satellite symposium organised by: Company ABC'
 - 'The Allergy Academy has provided space for this satellite symposium. The programme was independently produced by the company and is not part of the scientific/educational programme offered by the Academy.'

Company Representative Participation Guidelines

- Sponsoring companies will receive a pre-determined number of badges, depending on the funding provided.
- Industry representatives shall not influence CME/CPD content in any way. Companies should never approach planning committee members or faculty to discuss the planning, presentation, or evaluation of the educational content. Faculty have been instructed to refrain from any such discussions.
- Absolutely no promotional activities or conversations will be permitted in the educational rooms immediately prior to, during, or after a CME/CPD session.
- Company representatives providing in-kind support:
 - In-kind support is sought from multiple companies, except when other equal but competing products or services are not available; therefore, representatives from multiple companies will participate.
 - Industry representatives in no way influence any portion of the CME/CPD activity; including how the in-kind support will be used or allocated to the educational sessions.
 - Industry employees shall be easily identifiable by their company and meeting badges.
 - The industry representative shall only contribute technical information about the use of the equipment/product.
 - The industry representative shall not expand his or her input into areas of clinical medicine such as:
 - Indications for use
 - Comparisons between competing products
 - Comparisons between the device, invasive surgery, and/or medical treatment
 - The Academy faculty and staff provide strict supervision to ensure proper professional behaviour by industry representatives.
 - The Academy reserves the right to physically limit the representative's access to the educational setting, requesting participation only when questions arise or further assistance is needed.

Baby Friendly Initiative

In compliance with the Baby Friendly Initiative, sponsors who are also manufacturers of infant formula products are restricted from entering NHS premises and alternative venues are sought for study days with their accompanying exhibition space and promotional/marketing activities.

Written Agreement

All industry support will outline the terms and conditions between the Academy and company in a written agreement, or memorandum of understanding. A company's own agreement may replace the Academy's standard document, but the document must comply with all guidelines outlined in this Code. The agreement will be signed by both parties and dated prior to the activity.

Transparency and Disclosure of Industry Support

Academy activities are supported, in part, by support from industry. All support is managed in strict accordance with this Code. Appropriate acknowledgement of all supporting organisations is made to participants prior to the educational activity as follows.

- On the event website
- In the programme booklet
- With signage during the event

Meetings and Hospitality

- Hospitality will remain proportionate to the events being run. The catering offered will be commensurate with the day course events offered and lie within the standard tariff offered by the venues being used.
- Accommodation will only be offered for speakers travelling from abroad or by particular arrangement after consideration of principles of equal access and proportionality.
- Travel expenses will be offered to speakers and facilitators engaged in providing direct support for the educational events. The amount offered will cover standard class rail fair return tickets for regional speakers and economy flights with accommodation where necessary for international speakers.
- The expected expenses will be outlined to all speakers prior to each event and will be proportionate to the work undertaken.
- Honoraria may be paid up to the ceiling limit of £250 per event for a speaker where their main institution of work is within England.

General Data Protection Regulation (GDPR) and Participant Information

In compliance with the General Data Protection Regulation (GDPR) laws, the Allergy Academy will explain how it ensures that delegates' identification details are kept confidential whilst administering event participation or membership.

This notice will include a link to a separate web page containing the King's College London's full privacy notice detailing the broader legal basis for processing their personal data; this core information does not need to be duplicated for Academy purposes. Practically speaking the Academy will provide the following information at the time of obtaining personal data.

- **Data Privacy**

If you need to contact us about this privacy notice, please contact Allergy-Academy@kcl.ac.uk. We are the Allergy Academy, part of King's College London. We collect and process your personal information in order to facilitate your participation in Allergy Academy events and activities. Data protection legislation allows us to use your personal information in this way because it is required for our public purpose as a teaching and research institution. You must provide the personal information in order for the Allergy Academy to process your registration and keep you informed of important details regarding your participation. Not providing this information forfeits your registration because we must maintain participation and payment records of events in order to administer these events. We will keep your information on file until you request for it to be removed. Networking and discussion are part of the educational experience of our face-to-face events. To facilitate these important interactions, we offer delegates the chance to be included in an 'Optional Open List of Delegates' that will be shared with our sponsors and attendees. Information provided will include the delegate's name, organisation, and location of work; other personal contact details will not be included. Inclusion in the list is optional and delegates may attend Academy events whether or not they wish to declare their attendance on the programme. At the time of booking an event, we ask prospective participants to actively opt-in for their inclusion in this list. To find out more about King's College London's policy on dealing with your personal information, including your rights and who to contact if you have a concern, please see the university's core privacy notice at <https://www.kcl.ac.uk/terms/privacy.aspx>.

- **Informed Consent (included in booking form)**

- Do you wish to be included in the 'Optional Open List of Delegates' provided to fellow attendees and sponsors? Information provided will only include your name, organisation, and location of work; other personal contact details will not be included. Yes / No

Activity Evaluation

Allergy Academy events are evaluated at the conclusion and include questions asking learners to provide feedback on whether the activity was balanced, objective, and free from bias. Responses are reviewed by the planning committee with corrective actions taken as necessary, including: increased education of returning faculty regarding the requirements, guest faculty not invited back, increased peer review of content, etc.

Complaints Procedure

Complaints may be received direct via the Allergy Academy website (www.allergyacademy.org), via email to Academy staff at Allergy-Academy@kcl.ac.uk, or verbally during one of the events. The complaints procedure will be managed by the Allergy Academy planning team and will result in written documentation being returned to the complainant within two weeks, unless an anonymous complaint has been received. The complaint will be shared amongst the immediate Allergy Academy team. Documentation will be retained and kept for review alongside the annual review of this Code.

Review of Code and Communication Practices

The principles of this Code constitute a framework for internal communications and practices as they relate to interactions with the commercial sector or other organisations where relevant. Review of this Code to evaluate its contemporary value, adherence to it by Academy staff and faculty, and documentation made of any adjustments will be done on an annual basis. The suggested review date is each summer to allow assessment of:

- Open discussion of this Code and its principles
- Delegates experience of compliance
- Staff and speakers' evaluation of progress
- Individual sponsors' relationships and expectations that have arisen
- Any new influences, complaints or emerging concerns from the wider network