



## Policy Guidelines on Commercial Sponsorship

### Background

PEN: Practice-based Evidence in Nutrition<sup>®</sup> is an evidence-based decision support service developed by Dietitians of Canada [DC] and managed by a collaborative partnership including Dietitians of Canada, The British Dietetic Association and Dietitians Association of Australia (the national dietetic association (NDA) partners). The purpose of PEN is to provide professionals, including dietitians and others who provide nutrition advice and support to clients/patients, with ready on-line access to trusted and credible practice guidance based on questions arising in everyday nutrition practice. Practice guidance in the PEN<sup>®</sup> system is developed by recognized authorities on each topic, who identify the relevant literature from filtered and original sources and critically appraise and synthesize this literature to answer the practice questions. Additionally, resources and other tools for use with clients that are congruent with the evidence are included in the PEN<sup>®</sup> System to support practice. The PEN<sup>®</sup> System is available as an individual license, through a site license for groups or institutions or a customized application to support dietitian call centres.

It is essential that the development of evidence-based tools for practice guidance is not biased through the influence of commercial entities that may stand to benefit from the PEN<sup>®</sup> System and its recommendations. Any such perception, either from members or from external stakeholders, that for-profit commercial organisations (notably but not exclusively - the pharmaceutical industry, food manufacturing/distributing industry and/or the food service industry) could bring into question DC's reputation and that of its NDA partners for impartiality and the scientific rigour employed in the PEN methods and undermine the confidence in the practice guidance. It is therefore imperative that DC and its NDA partners demonstrate transparency as to the funding for the PEN<sup>®</sup> system as well as its independence from external influences on the evidence-based content.

### Definitions

- *Knowledge pathway* - the PEN<sup>®</sup> System is designed using a knowledge path [KP] approach, each knowledge pathway related to a topic from the broad scope of the dietetics field (clinical, consulting, education, food service management, community nutrition, etc). A KP consists of succinct guidance statements and practice recommendations synthesized from the literature, supported by more detailed levels of carefully selected references, practice guidelines, position papers, and links to websites, electronic publications, databases and discussion groups as well as client education tools when applicable.
- *Commercial interest* - any for-profit manufacturer or provider of health care, or any other for-profit source with a real or potential vested interest in the practice guidance provided in a specific knowledge pathway. Government, not-for-profit agencies, DC Networks or those within the corporate sector that do not have real or potential vested interests in knowledge pathways can financially support the knowledge pathways (e.g. banks, insurance companies).
- *Sponsorship* - a sum of money given to DC to support any of the following:
  - the writing, or updating of KP content

- the selection of appropriate tools and resources for a knowledge pathway
- development of the technology platform
- *Firewall* – a term used figuratively in this document to describe a clear barrier or separation between a source of funding and its application so as to prevent any influence by the funder on the evidence-based content in the PEN<sup>®</sup> System

### **Policy Guidance**

1. There will be a clear firewall established between the production of content or updating of a KP and any funding from commercial sources with financial interests in the content of the KP.
2. Direct sponsorship of a KP by any commercial source or sources (as defined above) is prohibited. This does not preclude the fact that sponsorship may be applied to the technology supporting the KP components (see items 3 & 4) or to commercial sponsorship to support health professional access to the PEN<sup>®</sup> service (see item 5). More specifically,
  - Sponsorship is allowed to support the development of the PEN<sup>®</sup> technology platform or to support set up costs of new PEN<sup>®</sup> technology applications. Such sponsorship will be consistent with DC's overarching sponsorship policies.
  - Sponsor has no rights whatsoever with respect to PEN<sup>®</sup> content.
  - Resources and or tools that have been developed by the corporate sector may be eligible for inclusion in the PEN<sup>®</sup> System if they are reviewed through an independent peer review process and deemed congruent with the evidence in the PEN<sup>®</sup> System. However, preference will always be given to tools that have not been developed by corporate interests, should similar tools exist.
3. DC may license content and make it available to external agencies and corporations, who may in turn provide access to their client group. In all cases, licensees must respect DC's copyright on all materials provided for that client group. Any requests for time limited print materials will be considered on a case-by-case basis. DC reserves the right to review and approve any use of its name in profiling this content by other parties to their client group. Furthermore, any modification made to PEN<sup>®</sup> content by another party must meet PEN<sup>®</sup> evidence-standards and be approved by the PEN<sup>®</sup> Director or designate. Such modifications will be clearly identified and the source declared.
4. Corporations may pay for or sponsor access to the PEN<sup>®</sup> System by a particular group through a licensing fee for their employees or other groups, or provide funding directly to Dietitians of Canada or NDA partners to support or offset the costs of PEN<sup>®</sup> subscriptions for a particular individual or group. Sponsor acknowledgement will not be provided on a PEN<sup>®</sup> portal.
5. As these same sponsorship policies apply to DC Networks, practice guidance materials that are developed by Networks and for which "for profit" sponsorship is accepted, will not be eligible for inclusion in a KP unless further independent review by knowledge pathway contributors is conducted and material meets PEN<sup>®</sup> evidence standards. Sponsored material is accepted only if non-sponsored material does not exist and

further independent review indicates the content is unbiased and provides an important addition to the knowledge pathway.

6. The PEN<sup>®</sup> Director will review and approve all external funding opportunities and will register these in a central repository to facilitate tracking and ensure transparency.
7. KP authors and reviewers will make a written declaration of any association with external agency that could be perceived as having a vested interest in the content of the knowledge pathway or any financial support received for private clinical practice (if relevant), stocks, legal advice, consultancies, involvement in primary research in the subject area of their review, and any other 'competing interests' that they judge relevant. Such declarations will be registered with Dietitians of Canada (see appended Duality of Interest form ).
8. If a KP author has been actively involved in a study/studies that was/were referenced/used as evidence in the pathway or where a KP author has authored a systematic review that is used as evidence in the pathway, The PEN<sup>®</sup> peer review process will ensure that the interpretation of the evidence and the practice guidance provided is not biased in favour of the KP author's research and/or systematic review. People with a direct financial interest in a particular intervention, therapy, therapeutic agent etc. should not be involved in contributing to a KP, either as authors, reviewers or editors.
9. Contributors to KPs may receive honorariums from DC for their participation, however, ongoing remuneration or royalties from the sale of PEN<sup>®</sup> subscriptions will not be considered. All PEN<sup>®</sup> authors must sign an Intellectual Property Waiver assigning copyright of the content to Dietitians of Canada.
10. All PEN<sup>®</sup> sponsorship policies are kept under continual review in accordance with DC time frames; modifications to their content will also be consistent with other DC policies. NDA partners will review the sponsorship guidelines and agree to comply with the terms outlined.
11. All PEN<sup>®</sup> sponsorship fees are payable directly to DC or the NDA partner.



## Declaration of Affiliations and Interests Form PEN: Practice-based Evidence in Nutrition®

**Name:** \_\_\_\_\_

I have reviewed my current activities and those of recent years, particularly as they relate to the attached *Affiliations and Interests Checklist*. I have also considered the activities of my spouse and immediate family members in so far as they could be viewed to affect my impartiality.

I would like to bring the following to the attention of Practice-based evidence in Nutrition [PEN]:

I hereby certify that I am not in a position of real, potential or apparent conflict of interest except as disclosed above.

If before the PEN content I am developing or reviewing has been completed there are any changes in circumstances that may place me in a position of real, potential or apparent conflict of interest I will inform PEN.

Signature \_\_\_\_\_ Date \_\_\_\_\_

Please return signed form to:

- adapted from the Office of the Canadian Task Force on Preventative Health Care

## **Affiliations and Interests Checklist**

In reviewing your activities (and those of your spouse and immediate family members) to determine whether they affect your impartiality or create a real, potential or apparent conflict of interest, among other things, consider the following:

- Investments in a business enterprise (Other than mutual funds or Registered Savings Plans)
- Retirement Savings Plans that are not self-directed);
- Participation as investigator in clinical trials of relevance to the knowledge pathway;
- Previous, present and potential Contracts, Grants and/or Contributions;
- Pending negotiations regarding potential contracts;
- Honoraria and other sources of personal income;
- Gifts and hospitality of significant value;
- Travel sponsorship;
- Promotion of a product(s) of relevance to the knowledge pathway;
- Publications;
- Public statements;
- Lobbying activities;
- Membership in special interest groups;
- Expert testimonies in court;
- Any interest or activity, which may create a reasonable apprehension of bias.