

Submission to MA Code of Conduct Review re Transparency Model– Friday 20-09-2013

My comments below relate to only a few aspects of the Transparency model Discussion paper developed by the TWG.

1. Re: (2) - I believe that transparency reports ought to be published by the Australian Health Practitioner Regulation Agency (AHPRA). I agree with the TWG in recognising that the Transparency Principles it developed apply to all relevant companies, not only members of Medicines Australia (MA). Publication by AHPRA, instead of MA, may assist in expanding the scheme.
2. Re: (3.3) - I prefer the use of AHPRA registration numbers to identify health professionals as noted in 3.3.
3. Re: (3.7) – I suggest that (b) be broken down into the individual categories listed and that the specific activities paid for are noted under (k), rather than simply the word “grant” being noted.
4. Re: (5) – I agree with the proposals for reporting thresholds in Alternative 2 (i), but I do not agree with the reporting exclusion proposed in Alternative 2 (ii). I believe that payments over \$10 provided at large scale events or conferences do need to be reported. (Note: Large scale events are not defined in the Glossary, I recommend that they be defined). I also believe that all costs, including non-hospitality and non-travel function costs, ought to be allocated to those who attend educational events and so included in information about payments/transfers of value. I agree that changing the reporting threshold each year in line with the CPI is appropriate.
5. Re: (5.3) – I believe that all payments made to a health professional involved in clinical research should be reported. (Note: research is defined in the Glossary, but clinical research isn't. This needs to change).
6. Re: (5.4) – I believe that the value of starter packs does need to be included in transparency reporting requirements, not excluded as noted in this sub-section.
7. Re: (5.11) – I believe that payments made to health professionals acting as expert witnesses in legal proceedings need to be included in transparency reporting requirements, not excluded as noted in this sub-section.
8. Re: (5.7) – I believe that business to business trading arrangements relating to the purchase of therapeutic goods need to be reported, not excluded as recommended in this sub-section.
9. Re: (5.10) – I believe that a dividend or profit distribution from an investment in a pharmaceutical or similar company needs to be reported, not excluded as suggested in this sub-section.

P. Jane Wilson

Patricia Jane Wilson. (Note: I am a member of Healthy Skepticism).