

ROYAL AUSTRALASIAN COLLEGE OF SURGEONS



Patron: H.R.H. The Prince of Wales

EXECUTIVE DIRECTOR FOR SURGICAL AFFAIRS

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Secretary
Code of Conduct Committee
Medicines Australia
16 Napier Close
DEAKIN ACT 2600

Email: secretarycodecommittee@medicinesaustralia.com.au

Dear Sir

Review Medicines Australia Code of Conduct

The Royal Australasian College of Surgeons was most pleased to be invited to be a member of the Transparency Working Group to consider revisions of the Code of Conduct but with particularly reference to providing transparency about payments or other transfers of value from pharmaceutical companies to health care professionals.

The Executive of the Council of the Royal Australasian College of Surgeons has considered the Consultation Discussion Paper that you have published and provides the following submission in response to that.

1. The RACS endorses the concept of transparency and openness with respect to interactions with the pharmaceutical industry and agrees that these relationships should be guided by appropriate Codes of Conduct.
2. It is appropriate that all health practitioners involved in any way with prescribing, dispensing, supplying, administering or recommending prescription medicines should be subject to public reporting of payments or transfers of value to these health professionals.
3. The College is of the view that it is appropriate for Medicines Australia to receive reports of such payments and transfers of value.
4. Practitioners ought have the opportunity to review, challenge or correct information recorded by pharmaceutical companies. In addition there ought be an ability for practitioners to remove information that has been incorrectly attributed to them. This should occur on a regular basis close in time to the transfer of value or payment.
5. It is appropriate that the practitioners be identified by name and place of practice rather than the AHPRA registration number as this will not cover all practitioners involved in the prescribing, dispensing, supplying, recommending or administering such medications.

6. The recommended category of payment or transfer of value is appropriate and supported by RACS.
7. The College is in agreement with '3.8: Payments to third parties, including registered charities'. The recommendation of recording payments to third parties is appropriate and supported by the College.
8. Payments or transfers of value related to CPD programs. The College is of the view that practitioners are involved in formal activities related to provision of CPD and that in the narrowly defined circumstances outlined, payments or other transfers of values for attending or speaking at a CPD program would not be required to be reported.
9. '5.0: Reporting threshold'. The College supports the concept that the threshold for recording payments and transfers of value should be \$25.00 with a recording threshold of \$250.00 per company per year. It would be appropriate that these thresholds are indexed on a regular basis.
10. While it is accepted that venue and equipment hire are necessary parts of providing educational opportunities, such costs should not be allocated to individual practitioners.
11. Payments for expert witnesses. The College supports the view that payments to health care professionals acting as expert witnesses in legal or administrative proceedings should not be required to be reported.
12. Publication of transparency reports. The College supports that such information should be published and that it be searchable on the basis of a health practitioner's name and place of practice.
13. The logistics of dates related to collection and publication should be left to Medicines Australia.
14. As this is a new process, the College feels that this should be reviewed at an early date and, as the Code of Conduct of Medicines Australia is reviewed on a regular cycle, it supports the concept that this process of reporting and recording should be reassessed at the next review of the Code of Conduct.

The College is appreciative of the opportunity to provide a submission on the deliberations of the Transparency Working Group with respect to the Code of Conduct of Medicines Australia.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John M Quinn', written in a cursive style.

Dr John M Quinn
Executive Director for Surgical Affairs