



## CCAN Code of Conduct Governing Corporate Funding

The *CCAN Code of Conduct Governing Corporate Funding* (the Code) is commitment undertaken by member organizations of the Canadian Cancer Action Network (CCAN), at their option, to adhere to specific policies regarding their financial relationships with commercial entities. The Code is intended to minimize the impact of real, potential or perceived conflict of interest that may arise when patient organizations accept financial support from companies.

CCAN member organizations may decide to adopt the Code on a voluntary basis. Doing so commits the member to implement the policies outlined below within their organization and to be accountable for the actions of their organization with respect to the Code. CCAN member organizations that decide to adopt the Code are required to sign this document and to recommit to the Code on an annual basis.

### Definitions

The following definitions apply to terms used throughout the Code:

- 'Organization' refers to a CCAN member organization
- 'Company' refers to a commercial entity providing, or seeking to provide, funding to a CCAN member organization. This definition includes agents of the company. The term is also used in the collective sense where more than one company is involved in a particular undertaking.
- 'Funding' refers to any of the five categories of financial support outlined under the Policies section

### Guiding Principles

The *CCAN Code of Conduct Governing Corporate Funding* is based on the following guiding principles:

- **Patient Interests:** All activities of the CCAN member organization will be conducted in accordance with the best interests of patients, of the organization and of CCAN as a whole.
- **Integrity and Scrutiny:** Organizations shall perform their duties in a manner that will withstand public scrutiny.

- **Respect:** Organizations will respect the stakeholder relations policies of the companies with which they are involved.
- **Impartiality and Transparency:** Organizations should ensure that they are impartial and objective and that decisions are made on the basis of merit. They will be as open as possible about all actions that they take and advice that they provide.
- **Accountability:** Organizations accept accountability for their compliance with the Code and ensure that their sponsors are familiar with the Code.

## Policies

Conflicts of interest may arise in a mutual relationship where one party has the capacity to exert undue influence over another. The following policies have been developed to ensure that relationships of CCAN member organizations and their corporate funders are ethical, transparent and reflect positively on both organizations.

### 1. Funding: Categories

Five funding categories are included in the Code:

**1.1 Project funding** - where a CCAN member organization establishes a collaborative partnership with a company to undertake a project relating to an issue of mutual interest. The following features will apply to this relationship:

- The organization maintains editorial control over all materials produced in connection with the project.
- The company may have representation on the project steering committee, however decisions about the composition of the project steering committee are at the sole discretion of the member organization.
- The sponsor will be acknowledged, in a way that is agreed in negotiations with the company.
- The member organization will not endorse or promote individual products or services.
- The member organization and the company may both benefit from the relationship.

**1.2 Sponsorship** - where a company funds a single activity such as an external meeting or newsletter. In this case the following will apply:

- The company has no involvement in the activity for which the sponsorship is granted.
- The organization maintains editorial control over all materials or meeting programs and has sole discretion on the meeting attendees.
- The organization will not endorse or promote the company's products or services.
- The sponsor will be acknowledged, in a way that is agreed in negotiations with the company.
- The organization and the company may both benefit from the relationship.

**1.3 Unrestricted grants** are defined where all of the following apply:

- The company has no involvement in the project for which the grant is used.
- The grant will be acknowledged, however the company's logo is not used.
- The organization controls the wording and position of the credit.

**1.4 Financial donations and in-kind support** may be offered to the organization.

- In these cases the recipient will acknowledge the name of the corporate donor on its website and/or annual report if the amount of support is greater than 10 per cent of the organization's total annual revenues. The monetary value of in-kind support over \$1,000 should be included in the total amount of the sponsorship.

**1.5 Support of research activities**

- Financial support for research projects may be provided by a company for administration by the organization. This may take the form of an unrestricted grant or project funding and the respective policies apply to each form of support.
- The company may have representation on the project steering committee, however the organization maintains control over the choice of research organization, study design and publication of results.
- The sponsor(s) of any research activities will be acknowledged at the presentation and publication of results.

**2. Policies for CCAN Member Organizations**

CCAN member organizations agree to adhere to the following policies when accepting project funding, sponsorship, grants or donations from companies. Questions about specific application of the Code should be directed to the CCAN Secretariat.

**2.1** Before accepting funding from a company, the organization's board or executive must conduct sufficient due diligence to satisfy itself that:

- There is strong reason to believe that the donation, grant or sponsorship will result in benefit to the organization and to the patients it serves.
- The company's type of business, its corporate governance policies and its reputation in working with patient organizations do not present any cause for concern.
- The organization will not knowingly accept any type of funding from a company that produces or sells commercial tobacco products or receives funding from their sales.

**2.2** The organization will maintain its independence of action.

- The content of communications originating from the organization, such as patient submissions for drug reviews, policy submissions, information for patients and the public, newsletters and presentations must be developed entirely by the organization without any assistance from the staff of companies or their agencies.
- Submissions for drug reviews or policy recommendations will not be shared or reviewed with sponsors in advance.

- The organization will not endorse or promote individual products or services. Advocacy activities, such as making patient submissions for drug reviews or petitioning governments to fund a particular drug, are not considered promotion because these activities are intended to improve access to the treatment, rather than recommend that it be prescribed. Similarly, providing educational information on available treatments is not considered promotion.
  - If a company makes any attempt to coerce the organization to conform to its marketing agenda, either explicitly or implicitly, or does not conform to the memorandum of agreement, the organization will reject the funds or terminate an ongoing project.
- 2.3** The organization will maintain mutually respectful and transparent relations.
- The organization will sign a written agreement with all companies outlining each partner's contribution and responsibilities. The company and the organization must agree to abide by each other's codes of conduct.
  - A sponsor's support will be acknowledged transparently and in an appropriate way following discussions with the company concerned.
- 2.4** The organization will proactively limit the possibility of influence.
- Organizations should seek a diversity of funding sources and should not allow any one corporate sponsor to contribute more than 50 per cent of their total revenues for the year, including the value of in-kind services.

### **3. Policies for Companies**

CCAN member organizations will not embark upon or continue with any sponsorship, grant making or collaborative venture that might damage its reputation or result in the dissemination of biased and inaccurate information. Therefore, when working with the CCAN member organization, companies are expected to adhere to the following guidelines:

- 3.1** The organization must be consulted whenever and wherever its name is used, particularly in external communications. Approval must be sought for any copy produced which refers to an initiative of the organization that is supported by the company.
- 3.2** At no time can the organization's logo be used without express written permission.
- 3.3** At no time can press releases be issued which refer to the organization without the organization's prior approval. Likewise, suggested quotes can be prepared but must always be agreed by the an appropriate person of authority within the organization.
- 3.4** The organization retains a veto over all materials produced in connection with an initiative. Adequate approval time needs to be allowed for this as it may require approval from one or more Board members.
- 3.5** Where more than one branded version of a product exists, any materials produced as part of an initiative will use either the scientific name or several different brand names.

## **Commitment and Enforcement**

Commitment to the Code by CCAN member organizations is on a voluntary basis. Signatories are accountable for enforcing its policies within their organizations. Once the organization signs, it has the right to display the CCAN Code of Conduct Seal (graphic to be provided) on its website and on any materials for the period of agreement. CCAN will also consider publishing the Code on its website and listing all member organizations that have adopted the Code.

No formal system of oversight will be put in place by CCAN to monitor adherence to the Code. However, should a potential violation of the Code be brought to the attention of CCAN, the member organization will be invited to respond with an explanation. If the explanation indicates that there is insufficient understanding of the Code, the member organization will be asked to review its policies with CCAN. Should the review process prove unsatisfactory, the CCAN Board may take further action.

## Signatures

By signing below, I agree to commit my organization to the policies contained in the *CCAN Code of Conduct Governing Corporate Funding* (the Code) for a period of one year. After this time my organization may renew its commitment to the Code on an annual basis.

*On behalf of the CCAN member organization:*

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Signature      I have the authority to bind my organization

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Name and title

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Date

*On behalf of CCAN:*

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Signature      I have the authority to bind my organization

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Name and title

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Date