

# ANONYMOUS v ASTRAZENECA

## Alleged inappropriate hospitality

An anonymous complaint was received about inappropriate hospitality alleged to have been provided by three pharmaceutical companies, one of which was AstraZeneca. The complainant provided a copy of the programme for a meeting of the Midlands Psychiatric Research Group to be held in June 2007.

The complainant alleged that a few psychiatrists under the name of 'West Midland Research Group' had been using pharmaceutical companies for their personal advantages, ambitions and growth. The group organised one meeting a year and called it an international conference. There was no scientific committee, no invitation for research abstracts or poster. The group invited whom it wanted to. Until last year the registration fee was very little, about £15. Delegates were allowed to have free hotel, food and an evening cultural programme. It was inappropriate hospitality at the expense of pharmaceutical companies. Even delegates might not be aware that pharmaceutical companies had given money.

The Panel noted that there were some differences between the programme for the 2007 meeting submitted by AstraZeneca and that provided by the complainant.

The programme provided by AstraZeneca provided a statement that AstraZeneca and other companies were providing educational grants.

In relation to the 2007 meeting AstraZeneca had paid £5,000 towards accommodation costs, delegate rates (including lunch and dinner), printing of abstracts, workshop and other educational material, audiovisual and function room hire and speaker fees.

The Panel considered that according to the programme, the scientific/educational content was not unreasonable for sponsorship by a pharmaceutical company. The meeting appeared to be primarily scientific/educational. The venue was not unreasonable. The programme referred only to 'Dinner' each evening. The Panel noted the allegations about the cultural musical event. There was no mention of this on the programme. It considered that if there was to be such entertainment then it would be inappropriate for a pharmaceutical company to sponsor it. The Panel noted AstraZeneca's submission that MPRG had told it that no entertainment activities were planned during the meeting nor were any referred to in its letter to AstraZeneca.

There was no evidence that AstraZeneca's sponsorship had paid for or subsidised a music programme as alleged in relation to the 2007 meeting. On the information before it the Panel considered

that AstraZeneca's sponsorship of the meeting as described was not unacceptable and thus no breach was ruled.

An anonymous complaint was received about inappropriate hospitality alleged to have been provided by three pharmaceutical companies, one of which was AstraZeneca UK Limited. The complainant provided a copy of the programme for a meeting of the Midlands Psychiatric Research Group to be held in June 2007.

## COMPLAINT

The complainant stated that a few psychiatrists under the name of 'West Midland Research Group' had been using pharmaceutical companies for their personal advantages, ambitions and personal growth. They had organised a conference and taken money from pharmaceutical companies for it. In fact nobody knew what West Midland Research Group was; no research was conducted or published by this group and there was no research grant or funding available for this group. The group organised one meeting a year and called it an international conference. There was no scientific committee, no invitation for research abstracts or poster. The group invited whom it wanted to. Until last year the registration fee was very little, about £15. Delegates were allowed to have free hotel, food and an evening cultural programme. It was inappropriate hospitality at the expense of pharmaceutical companies. Even delegates might not be aware that pharmaceutical companies had given money.

The few psychiatrists used this money to invite speakers who they wanted to oblige and they were friendly. They paid their fare, speaker fees, and hotel expenses. They used pharmaceutical company money for hospitality of delegates who seemed to be their friends and repeatedly attended their conference. They all enjoyed the evening cultural programme. It was like an annual get-together for them.

The group had taken money from AstraZeneca. One of the organisers maintained the data base of most of the Asian and Arabic psychiatrists. It was a number game. They had numbers to influence pharmaceutical companies and pharmaceutical companies tried to oblige vulnerable psychiatrists who could increase the prescriptions.

The pharmaceutical companies wanted to sell their medicines and it was a good nexus to have mutual benefits. It was worth investigating.

More or less the same delegates attended their other meetings such as the South Asian forum meeting. The

majority of delegates were the same every year. It was indicated that money was paid directly to 'West Midlands Research Group' and they used this money as they wanted for cultural programmes, hotel and other expenses.

Delegates were motivated by the free hotel and sense of holiday; until last year they were allowed to bring their family, meeting common friends and enjoying night cultural programme.

Organisers benefited by trying to influence and build up relationship with world prominent psychiatrists who they invited as speakers and then used them for personal growth. They got impressed by seeing a large number of psychiatrists.

The motivating factor for pharmaceutical companies was taking advantage of numbers and trying to sell their medicines.

When writing to AstraZeneca, the Authority asked it to respond in relation to Clauses 2, 9.1 and 19.1 of the Code.

## RESPONSE

AstraZeneca noted that the Midlands Psychiatric Research Group (MPRG) was an independent group of NHS doctors that was set up by a psychiatrist (the current Chairman) nine years ago for the purpose of organising medical educational activity in the Midlands region. Some of this activity included the facilitation of small collaborative groups to discuss research. The MPRG was not created by, nor did it depend for its existence on, the industry. The group was no different to many such groups in the NHS nationwide that existed to promote and organise educational activity.

The MPRG was not affiliated to the South Asian Forum referred to by the complainant and was open to non-Asian delegates. The educational agendas did not have any focus on South Asian topics.

Since its inception nine years ago, the MPRG had been organising annual CPD approved educational events running over the course of 2-3 days with wide ranging, topical agendas on psychiatry that had attracted speakers and delegates from around the UK and abroad. Each of these meetings was financially part-sponsored by multiple pharmaceutical companies and by delegate registration fees. They were academically sponsored by the WPA (World Psychiatric Association) and WAPR (World Association for Psychosocial Rehabilitation). The group also regularly organised many smaller hospital educational meetings.

AstraZeneca sponsorship of MPRG

AstraZeneca had provided financial part-sponsorship for each of the large annual meetings held since 2004 with the exact proportion of total funding varying annually. The MPRG organised various other much smaller educational activities around the Midlands but

AstraZeneca had not provided funding for any of these. Nor had AstraZeneca funded or supported the MPRG for any other form of activity or materials.

AstraZeneca provided funds for the annual meetings on the basis of information provided by the MPRG in sponsorship applications that it initiated. The applications were all considered under the terms of the AstraZeneca sponsorship policy, as were all requests for financial support from NHS institutions, academic groups and such like for projects that would benefit patients and support the NHS.

In its applications, the MPRG provided details of each of these meetings as required by the AstraZeneca sponsorship policy. These details were scrutinised for Code and Policy compliance and funding provided by direct transfer to the MPRG account with no further involvement from AstraZeneca other than the presence of a promotional stand in the exhibition area of the meetings along with other pharmaceutical companies. AstraZeneca personnel did not attend any other parts of the meetings including the educational sessions, dinners or any social events.

AstraZeneca had never chosen, invited, or sponsored the attendance of, individual delegates to these meetings.

The MPRG initiated, organised and delivered these meetings. It created the agenda, chose the venue, speakers and invited the delegates. Spouses were never invited except as delegates in their own right. AstraZeneca provided part-funding on the basis of information about these meetings provided by the MPRG. AstraZeneca had never had any input into, or approval of, any of the meetings content including the presentations and workshops; it had never chosen, briefed or recommended any of the speakers and had not determined nor used any outputs of any of the meetings. Nor did it have any intention of doing so in the future. AstraZeneca provided funding on the basis that these meetings would be of ultimate benefit to patients and the NHS and had never attached any conditions or requirements for commercial or other benefit to AstraZeneca from these meetings in any way.

Therefore, AstraZeneca believed that final responsibility for these meetings rested with the MPRG.

AstraZeneca provided detailed information about by the MPRG in relation to each of the annual meetings from 2004 to 2007.

### 1 Meeting on 14 - 16 June 2007

AstraZeneca paid £5,000 towards this meeting which the MPRG estimated would cost £38,000-£40,000. Five other pharmaceutical companies had also provided funding. In response to this complaint, the MPRG had indicated that delegate fees would contribute approximately £6,150 towards the total cost (with around 123 delegates paying a £50 registration fee each).

AstraZeneca approved and provided this funding on the basis of information provided by the MPRG in its letter of application, which was provided.

Below was the information that the MPRG submitted in support of its application (in bold) followed by AstraZeneca comments on the acceptability of that information:

- **The MPRG submitted that this was to be a CPD approved, quality medical educational event that would be of benefit to patients and the NHS.** A high quality medical educational event in topical areas of psychiatry would upskill clinicians and was therefore of clear ultimate benefit to patients and the NHS. From the repute of the stated speakers and fact of academic sponsorship from the WPA and WAPR, this was a very high quality medical educational event.
- **Draft agenda for the meeting setting out timings, subjects and speakers** (provided). This agenda detailed 16 hours high quality, non-promotional education over 3 days (Friday, Saturday, Sunday) and 2 nights. The two overnight stays were justified since delegates were expected from all over the country and because of the length of the educational content. The speakers were of national and international repute and three of them were from other countries (one each from the USA, Italy and India). The quality of this agenda would lead to ultimate benefit to patients and would support the NHS. This draft was sent to delegates upon invitation early in the year and did not acknowledge industry sponsorship because it was created before such support had been finalised. This was the same draft as submitted by the complainant. However, the initial invite/registration letter (provided) sent to delegates along with this draft agenda did refer to industry funding (see second to last bullet below). Also, the final agenda (provided) referred to the receipt of educational grants from AstraZeneca and five other companies.
- **A breakdown of the specific ways in which sponsorship funds would be used and the projected total cost of the meeting (£38-40K).** The MPRG stated that the funds were to be used on accommodation costs, delegate rates (including lunch and dinner), printing of abstracts, workshop and other educational material, audiovisual and function room hire, and speaker fees. All of these were legitimate meetings costs. In response to the complaint, the MPRG had provided AstraZeneca with an accepted delegate list that contained 123 anticipated attendees. With a total meeting cost of up to £40K spread across these 123 delegates, that equated to £325 per delegate which was not an unreasonable amount considering that this included payment for all these meeting related costs including accommodation and subsistence across 3 days. AstraZeneca believed that these costs were modest and at levels that the delegates would adopt when paying for themselves.
- **The venue.** This was a 3 star venue that was not recognised as a luxury or sporting venue and had suitable conference, restaurant and accommodation facilities that were conducive to the primary educational purpose of the meeting. The typical charge for overnight accommodation at this venue was modest and in line with the levels that delegates would adopt when paying for themselves.
- **The nature of the delegates to be invited** (NHS consultants and junior doctors). All delegates were invited by the MPRG. AstraZeneca had not chosen, invited or sponsored the attendance of any individual delegates. The MPRG did not have a formal membership and had told AstraZeneca that meeting invitations (in the form of a draft agenda and invite/registration letter) were posted to attendees of previous meetings. The draft agenda for the meeting was also advertised on hospital notice-boards around the Midlands region and other areas. In response to the complaint, the MPRG had given AstraZeneca a copy of the invitation/registration letter (provided). This letter made clear that spouses and non-medical individuals should not attend. The MPRG had stated to AstraZeneca that spouses and non-medical family members were not invited to (and nor did they attend) any of the meetings from 2004-2007 unless they were delegates in their own right.
- **The existence of academic sponsorship by the internationally recognised World Psychiatric Association (WPA) and the World Association for Psychosocial Rehabilitation (WAPR).** Sponsorship by these associations was an independent validation of the high educational content of these meetings. A copy of the letter to the MPRG, confirming academic sponsorship from the WPA and WAPR, was provided.
- **A written assurance that the contribution of AstraZeneca would be acknowledged on all materials relating to the event.** In response to this complaint, the MPRG had made available the initial invitation/registration letter (provided) that was sent to the delegates. This letter stated ‘... some pharmaceutical companies are providing some funding ..’. No individual companies were named because at the time that this was sent, such funding had not been confirmed. This letter also made clear that spouses and non-medical individuals should not attend. Also provided was a copy of the final agenda (to be disseminated at the meeting), which clearly stated that educational grants had been received from AstraZeneca and five other companies.
- **A written assurance that the MPRG would comply with the Code in the conduct of the meeting.**

AstraZeneca noted that the MPRG’s application for sponsorship did not refer to any social or entertainment events.

Having scrutinised this sponsorship application, AstraZeneca paid £5,000 as part-funding towards the total costs by way of a direct bank transfer into the official MPRG account. At the same time, a letter of agreement was sent to the MPRG (provided) setting out terms & conditions. These terms stated that the funds were being provided only for the use stated by the applicant.

In response to the complaint, the MPRG had also given AstraZeneca the final delegate list (provided). This list contained 123 delegates of whom 81 were from the Midlands, 32 were from other parts of the UK and 10 were from abroad. This emphasised the broad national and international appeal of the agenda and the need for overnight stays because more than a third of these 123 delegates would have to travel for 1.5 hours or more.

The MPRG had stated to AstraZeneca that no entertainment activities were planned during this meeting nor were any such referred to, in its letter of application.

### Summary

The MPRG initiated, organised and delivered this meeting. AstraZeneca had contributed a fraction of the total costs, on the basis of information provided in an application initiated by the MPRG. This was an educationally valid, independent meeting that had been sponsored by several pharmaceutical companies. The arrangements had made for accommodation and subsistence were modest, in line with the Code and secondary to the educational purpose of the meeting. AstraZeneca believed that this was a valid sponsorship request. Therefore, AstraZeneca denied a breach of the Code with regard to Clauses 2, 9.1 and 19.1.

### Overlap of delegates across meetings

In response to the complaint, the MPRG had told AstraZeneca that delegates were chosen on the basis of their status as clinicians in psychiatry. Delegates to previous meetings were invited to subsequent meetings on the basis that their previous attendance demonstrated an interest in the type of educational agenda that the MPRG created. AstraZeneca believed that this was a valid basis for an invitation. In addition, the agenda was more widely circulated on hospital notice boards and the MPRG had stated that 20-30% of attendees at each meeting had never attended a previous meeting. It was likely that many delegates would re-attend successive meetings as was likely to occur in any valid, annual educational event or congress.

In its letter of application, the MPRG stated that the criterion for invitation was purely the status of the invitee as a clinician and not any personal or other relationship.

### Conclusions

AstraZeneca maintained that sponsorship of these educational meetings was entirely valid, Code compliant and led to significant benefits to patients and the NHS through the maintenance and enhancement of the medical skills and knowledge of clinicians. The MPRG was an independent organisation whose applications for sponsorship AstraZeneca had scrutinised for Code compliance and funded in good

faith along with several other companies.

### PANEL RULING

The Panel noted that there were some differences between the 2007 programme submitted by AstraZeneca and that provided by the complainant. The Panel noted that the 2007 meeting was to start on the evening of 14 June with a lecture and dinner. According to the programme provided by AstraZeneca, the programme for Friday 15 June ran from 9.15am until 4.45pm and the arrangements for Saturday were similar, 9.30am until 5pm. There were small differences in timing in the agenda provided by the complainant.

The programme provided by AstraZeneca stated that AstraZeneca and other companies were providing educational grants.

The Panel noted that the complainant included the programme for the 2007 meeting. No specific allegations had been made about other meetings. AstraZeneca had provided details of its interactions with the West Midlands Research Group in relation to annual meetings from 2004 onwards.

The 2007 meeting was to be held in Coventry. AstraZeneca had paid £5,000 towards accommodation costs, delegate rates (including lunch and dinner), printing of abstracts, workshop and other educational material, audiovisual and function room hire and speaker fees.

The Panel considered that according to the programme, the scientific/educational content was not unreasonable for sponsorship by a pharmaceutical company. The meeting appeared to be primarily scientific/educational. The venue was not unreasonable. The programme referred only to 'Dinner' each evening. The Panel noted the allegations about the cultural musical event. There was no mention of this on the programme. It considered that if there was to be such entertainment then it would be inappropriate for a pharmaceutical company to sponsor it. The Panel noted AstraZeneca's submission that MPRG had told AstraZeneca that no entertainment activities were planned during the meeting nor were any referred to in its letter to AstraZeneca.

There was no evidence that AstraZeneca's sponsorship had paid for or subsidised a music programme as alleged in relation to the 2007 meeting. On the information before it the Panel considered that AstraZeneca's sponsorship of the meeting as described was not unacceptable and did not breach Clause 19.1. The Panel did not consider that there had been breaches of Clauses 2 and 9.1.

Complaint received	27 April 2007
Case completed	21 May 2007