

GUIDANCE REGARDING ETHICAL CONSIDERATIONS FOR RETURNING TO IN-PERSON INTERACTIONS WITH HEALTHCARE PROFESSIONALS IN THE CONTEXT OF COVID-19

Innovative Medicines Canada (IMC) is issuing this guidance to provide its member companies with a non-exhaustive list of factors to consider when resuming in-person interactions with healthcare professionals (HCPs). This guidance must be applied in a manner consistent with all applicable laws and regulations. This guidance should also be considered in the context of any general direction and guidance from national, provincial, and municipal governments.

Members should be mindful of the factors outlined below as we emerge from the current pandemic. It is now more important than ever to demonstrate the professional sensitivity of the industry, the desire to do the right thing and to protect the health and safety of patients, healthcare workers, employees, and communities.

As the industry begins to transition to a new way of working as a result of the pandemic, we trust that each of our member companies will make an independent determination regarding when and how to resume in-person interactions with HCPs and others within our health care system.

While companies will need to make their own individual decisions with respect to specific re-entry issues, we must continue to be guided by our Code of Ethical Practices (Code) and its Guiding Principles. The following should also be considered as we transition back to in-person interactions with HCPs:

1. **COVID-19 prevalence, availability of testing, monitoring and tracing:** Member companies should proceed gradually to allow in-person interactions with HCPs and make decisions based on the prevalence of COVID-19 in a community, the availability of testing, monitoring, and tracing of the disease. It is advisable that member companies continue to monitor the rate of new cases within a community to inform their decisions with respect to resuming in-person interactions. Where testing, monitoring, and tracing is lacking in certain communities, member companies should consider whether adequate protocols are in place before re-engaging with HCPs.
2. **Hospital/HCP capacity and resourcing:** The ability of hospitals and HCPs to manage the treatment of patients while also engaging with the industry should be carefully considered prior to resuming in-person visits to avoid unnecessarily burdening the healthcare system. Particular attention should be paid to facilities treating those most vulnerable to the virus, such as senior care facilities, infusion centers, and high-risk hospitals. The availability of personal protective equipment (PPE) and other medical supplies should also be considered to ensure that sufficient resources are available for the protection of both HCPs and member company employees.
3. **HCP receptivity:** Even where permitted by governments and healthcare facilities, members should be sensitive to the toll the pandemic may be taking on HCPs, who may be too busy or preoccupied to engage with industry at this time. Efforts should be made to ensure HCPs are comfortable with



renewed visits prior to re-engagement. Member companies should look to HCPs and healthcare facilities to provide guidance on how to best engage with them during this challenging time (e.g. meeting digitally, in-person, or not at the present time).

4. **A tailored approach:** Some HCPs are less impacted than others by the pandemic. If a request for an in-person meeting is provided to a member company, responding to such request is appropriate. However, the member company should take appropriate measures to ensure the health and safety of all which could mean wearing appropriate PPEs and following strict hygiene protocols. Similarly, if a clinic is accepting in-person meetings, the member company may contact them and book an appointment in advance. The member company should ensure it is informed of the PPE and hygiene protocols of the clinic and comply with the protocols. It is advisable that member companies confirm any visits before attending to the clinic and also confirm any changes to the clinic's protocols. Member companies should ensure that physical distancing requirements are respected and should refrain from unscheduled walk-in interactions.
5. **Provision of meals and refreshments:** Meals and refreshments are acceptable for in person meetings provided the clinic protocols permit it, the standards in the Code are followed, and all required/appropriate personal safety/hygiene practices can be met.
6. **Safe work practices:** Member companies should ensure continuous education and reinforcement of personal safety and hygiene practices, including social distancing by avoiding crowded waiting rooms, enhancing cleaning practices and ensuring availability of PPE to those who need them. Member companies should also ensure that any employees who are not feeling well do not attend in-person meetings.

Maintaining ethical interactions with the medical community is central to our industry's purpose to discover, develop, and commercialize innovative medicines and vaccines that improve the life of all Canadians. Industry interactions with HCPs must be consistent with the Code and its Guiding Principles, as well as the International Federation of Pharmaceutical Manufacturers & Associations' (IFPMA) [Ethos](#). Any engagement and interaction should uphold the integrity and reputation of the industry.

This guidance reflects the current understanding of the pandemic, and will be monitored and assessed on an ongoing basis. Members will be advised with respect to any subsequent modifications.