



دائرة الصحة
DEPARTMENT OF HEALTH

POLICY ON INTEGRITY AND BENEFIT DISCLOSURE

September 2022



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Document Title:	<i>Policy on Integrity and Benefit Disclosure</i>
Document Type:	<i>Policy</i>
Document Ref. Number:	<i>DOH/Policy/IBD/1</i>
Effective Date:	<i>September 2022</i>
Document Owner:	<i>Research and Innovation Center</i>
Applies to:	<i>DOH licensed Healthcare Professionals and Facilities. DOH authorized Health Payers, third party service providers, vendors and brokers.</i>
<i>This Policy should be read in conjunction with related Abu Dhabi and UAE laws, DOH Standards, Policies, Manuals and Resolution No. (36) of 2019 regarding disciplinary regulations for the health sector of the Emirate of Abu Dhabi.</i>	



ABOUT DEPARTMENT OF HEALTH (DOH)

The Department of Health (DOH) is the regulatory body of the health system in the Emirate of Abu Dhabi and seeks excellence in health for the community by regulating and monitoring the health status of the population. DOH defines the strategy for the health system, monitors and analyses the health status of the population and performance of the system. In addition, DOH shapes the regulatory framework for the health system, inspects against regulations, enforces regulations, and encourages the adoption of best practices and performance targets by all health service providers. DOH also drives programs to increase awareness and adoption of healthy living standards among the residents of the Emirate of Abu Dhabi in addition to regulating scope of services, premiums, and reimbursement rates of the health system in the Emirate of Abu Dhabi.

The Health System of the Emirate of Abu Dhabi is comprehensive, encompasses the full spectrum of health services and is accessible to all residents of Abu Dhabi. The health system encompasses, facilities, professionals, patients, insurers, and the regulator. Providers of health services include public and private services; and the system is financed through mandatory health insurance (with the exception to Thiqa) and has three main sources of financing including Employers or Sponsors, the Government and Individuals.



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1. Introduction

This Policy sets out the direction of the Department of Health on integrity governance and addressing the risks associated with conflicts of interest across the healthcare facilities within the Emirate of Abu Dhabi.

The purpose of this policy is to specify the principles and minimum requirements with which the healthcare sector, including healthcare professionals and facilities, must comply to ensure the following:

- Reduce the likelihood of any conflict of interest.
- Enhance the transparency & accountability and disclosure requirements.
- Ensure effective governance of conflicts of interest including monitoring, evaluation, and reporting.

2. Definitions and Abbreviations

Term	Definition
Joint working	Defined as situations where benefit the patient is perceived by utilizing joint experience and /or resources of pharmaceutical companies and DOH licensed professionals.
Healthcare Professional	A person who by education, training, certification and licensure is qualified to provide healthcare services.
Transfers of Value	Direct and indirect transfers of value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of any Medical Product for human use.
Healthcare Facility - Organization code of conduct	This policy lays out the organization's (here: healthcare facility's) principles, standards, and the moral and ethical expectations that employees and third parties are held to as they interact with the other organizations.
Conflict of interest	Conflicts can arise in situations where someone's judgement or actions may be influenced, or perceived to be influenced, by a personal, financial or other interest.
Integrity ¹	Honesty, commitment to the policies of DOH, and avoiding acts contrary to the code of conduct.

¹ DOH Healthcare Professionals Manual, 2017



3. Scope *This policy applies to:*

3.1 *All public and private healthcare professionals and facilities licensed by DOH in the Emirate of Abu Dhabi.*

4. Vision and Guiding Principles

4.1. Vision

4.1.1. *To encourage a culture of integrity, professional and ethical behavior, in all professional dealings of the healthcare sector in the Emirate of Abu Dhabi to maintain the highest level of services to the community, and individuals.*

4.2. Guiding Principles

The Guiding Principles for this policy are as follows:

4.2.1. **Transparency and Accountability:** *The commitment of all relevant stakeholders is required to avoid situations, which may give rise to conflict of interests. All healthcare professionals and facilities are accountable where non-compliance or any breach have been identified;*

4.2.2. **Serving the public interest:** *All healthcare professionals and facilities are expected to maintain and strengthen public's trust and confidence, by demonstrating the highest standards of professional competence, efficiency, and effectiveness, upholding the laws, and seeking to advance the public good at all times;*

4.2.3. **Integrity:** *All healthcare professionals and facilities are expected to make decisions and act without consideration of their private interests. The improper use of a position for private/ personal advantage is regarded as a breach of professional integrity;*

5. Policy Statement

This Policy ensures that all healthcare professionals and facilities perform their duties with integrity in accordance with organizational code of conduct and declare conflict of interest when such situation arises.

5.1. Code of Conduct

5.1.1. *Healthcare facilities are required to implement and adhere with:*

5.1.1.1. *A written organizational code of conduct that must be available as a reference document for all staff members including healthcare professionals, contractors and vendors;*

5.1.1.2. *The code of conduct shall be in accordance with DOH Professional Duties regulations chapter IV, Healthcare Professionals Manual.*

5.1.2. *The code of conduct shall minimally include articles relevant to:*

5.1.2.1. *Promoting culture of integrity and transparency;*

5.1.2.2. *Encouraging service delivery with high ethical standards and professionalism;*

5.1.2.3. *Commitment to compliance to applicable laws and best practice standards;*

5.1.2.4. *Develop and maintain associated documentation and record keeping.*

5.2. Healthcare Professionals

Healthcare professionals are required to fulfil the below requirements:



- 5.2.1. *Maintain the highest level of integrity and professionalism in their interactions with pharmaceutical companies or any other service providers;*
- 5.2.2. *Guard against situations where there may be appearance of a potential conflict of interest and their judgements could be compromised, or even questioned;*
- 5.2.3. *If an employee is unsure about how to handle a situation regarding transfer of value, they should refer to their Line Manager and/or organizational Human Resource Department for guidance;*
- 5.2.4. *All joint working with external contractors, vendors and entities will be conducted in an ethical, open, and transparent manner;*
- 5.2.5. *Joint working must take place at the organizational/corporate level, and not with individuals;*
- 5.2.6. *Not to misuse their official position, information and data, acquired in the course of their official duties;*
- 5.2.7. *Ensure that their professional status is not used in the promotion of commercial products or services;*

5.3. Declaration of Conflict of Interest

Healthcare professionals and facilities must ensure that they fulfill the requirements to declare any conflict of interest when such a situation arises:

- 5.3.1. *A Declaration of Conflict of Interest should be completed and signed by healthcare professionals, contractors and vendors as well as by external members involved in joint working;*
- 5.3.2. *Declaration of conflict of interest shall be submitted to the healthcare facility's management;*

6. Roles and Responsibilities

6.1 Healthcare Facilities must ensure:

- 6.1.1 *Circulate and ensure awareness of this policy within the organization;*
- 6.1.2 *Mandate compliance to the requirements of the policy through organizational code of conduct;*
- 6.1.3 *Maintain documentation records of signed declarations from healthcare professionals regarding understanding of the requirements of code of conduct;*
- 6.1.4 *Implement this policy into practice within their service areas;*
- 6.1.5 *Existence of a comprehensive strategy to support management of conflict of interest;*
- 6.1.6 *Take appropriate actions should any breach of policy arise;*
- 6.1.7 *Conflicts of interest declarations by healthcare professionals are compiled annually by the facility;*

6.2 Healthcare Professionals must ensure:



- 6.2.1 *Submit signed declaration pertaining to understanding the requirements of organizational code of conduct;*
- 6.2.2 *Submit conflicts of interest declaration to the facility management;*

7. Enforcement and Sanctions

- 7.1. *Healthcare professionals and facilities must comply with the terms and requirements of this Policy;*
- 7.2. *DOH may impose sanctions in relation to any breach of requirements under this Policy in accordance with the Complaints, Investigations, Regulatory Action and Sanctions Policy, Healthcare Regulator Manual;*

8. Implementation Arrangements

8.1. DOH shall:

- 8.1.1. *Ensure that the roles and responsibilities set out in this Policy are met through its regulatory powers and where necessary, set out further regulatory measures to address the current and future health system needs.*
- 8.1.2. *Develop key performance indicators (KPI's) to monitor the performance of the healthcare sector annually.*

8.2. Healthcare Providers shall:

- 8.2.1. *Meet the specific requirements as set out by DOH in this Policy along with all other relevant UAE rules and regulatory requirements around integrity and benefit disclosure.*

8.3. Health Insurers:

- 8.3.1. *Health Insurers are responsible for ensuring the requirements set out in this Standard and relevant UAE rules and regulations are met.*

9. Monitoring and Evaluation:

9.1. DOH shall:

- 9.1.1. *Develop a monitoring and evaluation framework involving healthcare professionals and facilities to monitor and evaluate the effectiveness of this Policy, and where necessary adopt changes to ensure continuous improvement within the healthcare system;*



10. References:

- 10.1. Chimonas, S., Mamoor, M., Zimbalist, S. A., Barrow, B., Bach, P. B., & Korenstein, D. (2021). Mapping conflict of interests: scoping review. *bmj*, 375.
- 10.2. MEA. LAWG. (2021) MEA code of promotional practices. Retrieved from: MEA Code Portrait 2.3 (1) (phrmag.com)
- 10.3. HPFT NHS Foundation Trust. (2018) Working with the pharmaceutical industry policy. Retrieved from: working-with-the-pharmaceutical-industry-policy-v1.pdf (hpft.nhs.uk)
- 10.4. Fickweiler, F., Fickweiler, W., & Urbach, E. (2017). Interactions between physicians and the pharmaceutical industry generally and sales representatives specifically and their association with physicians' attitudes and prescribing habits: a systematic review. *BMJ open*, 7(9), e016408.
- 10.5. Muth, C. C. (2017). Conflict of interest in medicine. *JAMA*, 317(17), 1812-1812.
- 10.6. BCPFT NHS Foundation Trust. (2016) Working with the pharmaceutical industry. Retrieved from: <https://www.bcpft.nhs.uk/documents/policies/p/1560-pharmaceutical-industry-working-with/file>
- 10.7. WBCCG NHS Foundation Trust. (2016) Working with the pharmaceutical industry policy. Retrieved from: WBCCG-Working-with-the-Pharmaceutical-Industry-Policy.pdf (healthierwigan.nhs.uk)
- 10.8. Hcpc. (2016). Standards of conduct, performance and ethics. Retrieved from: standards-of-conduct-performance-and-ethics.pdf (hcpc-uk.org)
- 10.9. Zelisko, D. L. C. (2015). *Managing Conflict Of Interest In Healthcare: The Roles Of Professionalism And Regulatory Colleges*. University of Toronto (Canada).
- 10.10. General Medical Council. (2013). *Financial and commercial arrangements and conflicts of interest*. Retrieved from: *Financial and commercial arrangements and conflicts of interest* (gmc-uk.org)
- 10.11. Lo, B., & Field, M. J. (2009). *Committee on Conflict of Interest in Medical Research, Education, and Practice Board on Health Sciences Policy. Conflict of interest in medical research, education, and practice*.