



**CODE OF GOOD EUPHA PRACTICE FOR
THE COLLABORATION WITH PARTNERS
AND COMMERCIAL CONTRIBUTORS**

Purpose of this Code

To fulfil its mission and its independence, EUPHA should continue to be mainly self-sustaining. However, securing resources from external sources to fully fulfil its mission must be considered.

The purpose of this code is to organise the relationship between EUPHA and partners and commercial enterprises and to provide an ethical and positive approach to co-operation and partnership.

Our vision

Our vision is of improved health and well-being and narrowing health inequalities for all Europeans. We seek to support our members to improve health in Europe, adding value to the efforts of stakeholders in regions and states, in national and international organisations, and individual public health professionals.

Our mission

Our mission is to facilitate and activate a strong voice of the public health network by enhancing visibility of the evidence and by strengthening the capacity of public health professional.

Working in partnership

Sustainable advancements in public health can only be achieved through collaboration. EUPHA is dedicated to working in partnership with European and international intergovernmental and non-governmental organisations as well as national institutes and organisations endorsing EUPHA's values and commitment to improve public health in Europe.

Principles

EUPHA wants to be a trustworthy partner for its members, the public, and its partners. Collaboration will be based on the principles of transparency and independence.

1. Transparency: information about the collaboration will be openly communicated.
2. Independence: the collaboration will not compromise EUPHA's mission.

Three general assumptions will shape the acceptance of all collaboration:

1. EUPHA will only accept collaboration for projects and activities that are consistent with EUPHA's mission.
2. Collaboration must enhance, and shall not impede, EUPHA's vision of improved health and reduced health inequalities for all Europeans.
3. EUPHA's name, logo and other intangible intellectual assets must be protected at all times.

Rules

Partners and commercial contributors working with EUPHA are expected to follow the EUPHA code and rules as agreed by the EUPHA Governing Board.

Partners and commercial contributors working with EUPHA on specific activities are required to comply to this code and rules as agreed by the EUPHA Governing Board.

Collaboration

1. Donations

1.1. Donations (cash)

Funds are not acceptable from partners and commercial contributors whose activities include those incompatible with broader public health objectives, (for example, tobacco products and arms manufacturers).

The acceptability of donations from partners and commercial contributors whose activities are related to the work of EUPHA should be determined in accordance with the present code.

1.2. Return of donations

Any support received by EUPHA which are subsequently discovered to be outside the terms of this Code will be returned to the donor by EUPHA.

1.3. Unspecified programme support

Subject to the provisions of this Code, partners and commercial contributors can make non- earmarked donations to EUPHA. The receipt of such general support is encouraged, provided that:

- The donation is not used to fund activities which are related to the commercial interests of the donor; and
- The amount of the overall funds to be raised is not expected to be so large that the activity would become substantially dependent on such support from a single company, or group of enterprises, for its continued operations.
- The dependency of the work of EUPHA on the support will be evaluated at regular intervals .

2. Activities

2.1. Annual scientific conferences

Since 2013, the EUPHA annual scientific conferences have been reorganised in a separate foundation - the EPH Conference Foundation. This Foundation is responsible for the organisation of the annual scientific conferences, including interaction with partners and possible commercial contributors. A special EPH Conference Code of practice has been elaborated.

2.2. Support for other meetings and satellite meetings

Other meetings and satellite meetings

Conferences organised by EUPHA members/sections using the EUPHA logo are subject to the rules set out in this EUPHA GEP code. In some cases, the EUPHA Executive Council may decide that the Good EPH Conference Code may apply to the meeting.

Joint meetings

It is acceptable to co-sponsor or jointly organise a meeting with commercial enterprises if a conflict of interest is not created. It is not acceptable to co-sponsor, or to jointly organise, a meeting with specific commercial enterprises. However, this does not preclude EUPHA co-sponsorship of a meeting where the scientific initiators have hired a commercial conference organiser to deal with the purely logistical aspects of the meeting, and this conference organiser has no input in the scientific content of the meeting.

2.3. EUPHA representatives participating in outside meetings

For the purpose of this Code, an outside meeting is a meeting held by another party than EUPHA and does not include a EUPHA co-sponsored meeting. No recommendations or other consensus emanating from an outside meeting can be considered as EUPHA recommendations or a position statement. The question of whether it is acceptable to receive funds from commercial enterprises or trade associations to support travel of EUPHA representatives to attend outside meetings or conferences falls into two categories:

- Meetings held by the company or trade association paying for travel. Travel support funds can be received if the company or trade association is also supporting the travel and other expenses of other participants at the meeting.
- Meetings held by a third party (i.e. a party other than the company or trade association proposing to pay for the travel). Wherever possible, funding should be given to EUPHA without reference to individuals. For example, a company could sponsor a specified number of individuals to attend a scientific conference and the EUPHA Executive Council would decide whether EUPHA would benefit from being represented and who should go to the conference.

2.4. Development of Code or Recommendations

In the particular case where a EUPHA activity is intended to produce guidelines or recommendations which are likely to be associated with EUPHA, funds should not be accepted from commercial enterprises which have a direct commercial interest in the subject matter of the guidelines. With regard to commercial enterprises which do not have such a direct interest, funding must be secured from at least two sources and pooled. This is intended to try to minimise the risk that EUPHA guidelines or recommendations are identified with a particular company.

3. Funding for salaries of staff

It is not acceptable to receive funds designated to support the salary of specific staff or posts (including short-term consultants) from commercial enterprises or other commercial sources.

On the other hand, it may be permissible to receive funds for a project which has a staffing element. The acceptability of such contributions to projects should be reviewed in the light of other relevant guidance mentioned in this document.

4. Publications

Subject to paragraphs 2 and 3 above, funds may be accepted from commercial enterprises for meeting the cost of EUPHA publications. Such contributions will be acknowledged in accordance with paragraph 5 below. Commercial advertisements can only be placed in EUPHA publications if included in the agreement for the specific publication.

For the EUPHA-owned European Journal of Public Health, the contract between EUPHA and OUP will prevail.

5. Acknowledgements and declarations

For reasons of transparency, contributions from partners and commercial contributors must be publicly acknowledged in all publications directly relating to the contributions.

Contributions for specific projects should be acknowledged in documentation relating to the activity concerned. Acknowledgements should normally be worded along the following lines

EUPHA gratefully acknowledges the financial contribution of [partner/company name] towards [description of the outcome or activity]

Contributors should not use the results of EUPHA's work for commercial purposes or seek promotion from the fact that they have made a donation. However, contributors are entitled to make reference to donations in their internal official documents, such as corporate annual reports. In order to ensure compliance with the above, fundraising letters to, and letters of acceptance of donations, commercial enterprises should be drafted in consultation with EUPHA. Anonymous donations from the corporate sector may not be accepted under any circumstances.

6. Use of EUPHA name/logo

No commercial company shall be authorised to use the EUPHA name or logo for the marketing of its products. No partner shall be authorized to use the EUPHA name or logo without prior written permission, following the regulations laid down in this Code.

7. Control

EUPHA must maintain full control over the activity to which a cash, human and/or material contribution relates, including over the contents of any report of the activity and over whether or not this report is published or disseminated in any form (e.g. electronically), and if so when.

Conflict of Interest

1. Avoiding conflict of interest

Funds should not be sought or accepted from enterprises which have a direct commercial interest in the outcome of the activities of EUPHA toward which they would be contributing, unless approved by the EUPHA Executive Council. Considerable caution should be exercised in accepting funding from enterprises that have an indirect interest in the outcome of the activities (i.e. the activity is related to the enterprise's field of interest, without there being a conflict as referred to above). In such event, other commercial enterprises having a similar indirect interest should be invited to contribute. In addition, it is preferable that funds from other sources are secured. The larger the proportion of the donation from any one source, the more scrutiny should be applied in avoiding the possibility of perceived conflict of interest.

2. Declaration of conflict of interest

Persons representing EUPHA must be asked to declare their conflict of interest in regard to stakeholders in the health care systems. In order to ensure transparency, these conflict of interests will be available upon request.

3. Conflict resolution

In the situation where it is not clear what is in the best interests of the public, the final decision should be by the Governing Board of EUPHA after consultation with the Executive Council.

Responsibility

1. Overall responsibility

The overall responsibility for the collaboration with the private sector and the implementation of this Code lies with the EUPHA Executive Council. The implementation of this Code has been delegated by the EUPHA Executive Council to the GEP (committee on Good EUPHA Practice for Collaboration with partners and commercial contributors).

2. Transparency

The EUPHA representative negotiating collaboration with partners and commercial contributors provides all the necessary information with the criteria mentioned in this code to allow a review of the collaboration by the authorised body.

Partners and commercial contributors interested in collaborating with EUPHA provide all the necessary information with the criteria mentioned in this code to allow a review of the collaboration by the authorised body.

3. Decision period

Decisions on collaboration with the private sector up to €99,999 will be taken within 3 weeks of providing the necessary and complete documents.

4. Detailed responsibility

Responsibility for the collaboration with partners and commercial contributors lies with:

- The Executive Director for gifts up to € 25,000
- The Committee on Good EUPHA Practice for Collaboration with partners and commercial contributors (hereafter: GEP – Good EUPHA Practice) for gifts between € 25,001-€ 99,999
- The Executive Council for gifts over € 99,999 and all gifts that provide high-profile, Association-wide impact. If no decision can be reached, the Governing Board will decide in this case.

In the specific case of the EUPHA owned European Journal of Public Health, the EJPH Council is responsible to comply with the rules in the contract EUPHA – OUP and take into account the rules described in this document.

5. Committee on Good EUPHA Practice for Collaboration with partners and commercial contributors (GEP)

The GEP consists of:

- the (vice-)president of the section Ethics in Public Health (chair)

- a representative of the Executive Council
- a representative of the Sections Council
- a representative of the Governing Board
- a representative of the EUPHA office

A possibility to invite 1-2 temporary experts lies with the chair of the GEP.

The GEP will be responsible for:

- Supervising the Executive director in his/her decisions of gifts up to € 25,000.
- Receiving a yearly overview of the Executive Director regarding all these activities, including those with negative outcomes;
- Reviewing all gifts of € 25,001 or more for donor adherence to the criteria established in this Code and making the final decision about donor adherence to this Code of gifts of € 25,000-€ 99,999;
- Reporting to the full Executive Council the outcomes of the reviews of gifts of € 25,001-€ 99,999;
- Making recommendations to the Executive Council on gifts of € 100,000 or more;
- Making recommendations to the Executive Council on all gifts that provide high-profile,- Association-wide impact
- Identifying more efficient review procedures and/or gaps in the process;
- Proposing to the Executive Council modification to the Code;
- The Executive Council will receive the report of GEP for all requests and gifts approved on a six-month interval;
- The EUPHA Governing Board receives an annual written report from the Executive Council 2 weeks before their annual meeting.

Changes to the Code

The GEP will regularly review the Code, identifying more efficient review procedures and/or gaps in the process and make recommendations to the Executive Council.

The Executive Council will make final recommendations on proposed modifications to the Code to the Governing Board. The Governing Board has the final decision on changes to this Code.

Implementation review

The application and impact of this Code will be periodically reviewed. Such review may include representation from the EUPHA Governing Board and other major partners of EUPHA.

ANNEX: CRITERIA FOR REVIEWING COLLABORATION WITH PARTNERS AND COMMERCIAL CONTRIBUTORS

Overall, the purpose of the review is to determine the balance of the benefit to the public in relation to the risks and costs of collaborating with the funding organization. On a case-by- case basis, the following conditions should be considered in determining the benefits and risks of collaboration.

A. Are the specified proposed uses of the donation, congruent with the mission and priorities of EUPHA?

Issues to consider in determining this congruence include:

1. How do the proposed uses of the donation relate to EUPHA's vision and mission?
 - EUPHA vision: "improved health and well-being and narrowing health inequalities for all Europeans. We seek to support our members to improve health in Europe, adding value to the efforts of stakeholders in regions and states, in national and international organisations, and individual public health professionals."
 - EUPHA mission: "to facilitate and activate a strong voice of the public health network by enhancing visibility of the evidence and by strengthening the capacity of public health professional."
2. Why does the organization want to collaborate with EUPHA?
3. How will the benefits to be derived from the intended purpose of the collaboration compare with the EUPHA's resources required to fulfil the intended purpose?
4. Do the practices of the corporation fit with the adopted public policies of EUPHA?

B. Are the partner's expectations pertaining to control, oversight, and outcome(s) of the collaboration acceptable to EUPHA?

EUPHA will accept funds only when EUPHA has control of the content of the activity and when EUPHA has and maintains complete control of all funds.

Issues to consider:

1. Does EUPHA have editorial control over the content of educational materials and publications and input into their dissemination?
2. Will EUPHA be able to review and approve public statements about the project, its findings and/or implications? Will EUPHA be in control of the funds at all times?
3. Are expectations on outcome, responsibilities, methods of implementation, and duration of funding feasible and agreeable? (Any special expectations of the donor need to be explicit and documented).

C. Are the partner's expectations regarding recognition or acknowledgment of their support acceptable to EUPHA?

Acknowledgments will be limited to company name, logos, slogans which are an established part of the supporter's identity, trade names, addresses and telephone numbers.

Issues to consider:

1. Is the extent to which the name of the corporation is affiliated with EUPHA and the proposed project defined by EUPHA acceptable to the donor?
2. What public recognition is expected by the donor?
3. Is the recognition appropriate for the amount of the gift?
4. Is there an appearance of product endorsement?

D. Would collaboration create any real or apparent conflicts of interest, and would the impact and/or benefits of collaboration outweigh the risks of partnering?

In considering the following issues, EUPHA recognises the need to adhere to its principles and to weigh the benefits and risks of accepting the collaboration opposed to weighing just the opportunity of not accepting the collaboration.

Issues to consider:

1. Are there any personal, financial, or professional gains for EUPHA staff, members or other volunteers, which create a conflict of interest?
2. What is the impact of the collaboration and benefits to the public and public health?
3. Does the donor's image support or detract from EUPHA?
4. Does the impact and/or benefit outweigh the risks of collaborating with the potential partner?

PROCESS FOR REVIEWING COLLABORATION

The following points will have to be taken into consideration:

1. After filling out the checklist, contact EUPHA office. First review to see whether application is complete by EUPHA office. Electronic version only.
2. If complete, depending on request for collaboration (amount) forward to instance
3. GEP always informed (independent of amount).
4. Within 2 weeks internal clarity.
5. Within 3 weeks answer to applicant.
6. GEP decides by majority of votes. If in doubt, the issue will be forwarded to the Executive Council
7. If below 25,000 then Executive director first informs GEP on decision, one week to react. If no agreement, then the Executive council is consulted.
8. If over 100,000, the Executive Council informs GEP on decision. If not following recommendations from GEP, then the Governing Board has the final say.