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## **HCCA Submission on the Draft Royal Australasian College of Physicians' Guidelines for Ethical Relationships between Physicians and Industry – 4th Edition**

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Health Care Consumers' Association ACT (HCCA) was formed over 30 years ago to provide a voice for consumers on local health issues and now provides opportunities for health care consumers in the ACT to participate in all levels of health service planning, policy development and decision-making.

HCCA welcomes the opportunity to work with the Royal Australasian College of Physicians (RACP) to provide input to the draft Guidelines for Ethical Relationships between Physicians and Industry.

These Guidelines will be a valuable tool for physicians as well as an important means of increasing consumer confidence in their health care providers. Consumers need to know that the advice and treatment they receive from physicians is in accordance with best practice, evidence-based and appropriately tailored to their individual needs.

Overall we support the Guidelines and the strategies outlined to maintain transparency and integrity in health service provision. However, we would like to emphasise the importance of keeping consumers informed and involving us in the implementation and monitoring of these Guidelines.

### **Consumer involvement**

In the Third Edition of the Guidelines, Section 1.8 acknowledged that consumer participation has ethical value and can contribute to the development of better health care systems. We also strongly supported the recommendation in Section 3 that any Conflict of Interest (COI) Committees should consist of community (or consumer) representatives and that their deliberations should be publicly available. We would like to see this sentiment reflected in the Fourth Edition.

It is also important that consumers are aware of any pecuniary or non-pecuniary interests of their treating physicians. With regard to patient support and educational programs (Section 3.2.5), we believe that physicians need to discuss with consumers the risks and benefits of becoming involved in such programs. This will assist us to make more informed decisions about our treatment options.

## Transparency and information

We agree with the statement that there are very few reasons for limiting the disclosure of pecuniary and non-pecuniary interests. Transparency is essential to consumers, because they need to know what is happening behind the scenes with regard to their health care.

Section 3.4.4 mentions that community members ‘assume’ that health professionals will provide advice based on the best available evidence and the needs of consumers. We would hope that this is more than just an assumption. Consumers place an enormous amount of trust in physicians and other health service providers to maintain objectivity and provide the best possible care. As such, ensuring that senior health professionals do not use their status to promote commercial interests needs to be a top priority for regulatory bodies.

In order to promote transparency and improved communication between health professionals and consumers, we suggest that ***a consumer summary of the new Guidelines*** be developed. This resource would assist consumers to understand the expectations and obligations of physicians with regard to disclosing COIs as well as the monitoring processes in place. It could also outline what consumers are entitled to know and the types of questions they might want to ask their physician.

## Research programs

Clinical research programs are essential in order to identify more effective treatments and improve health care services. HCCA strongly supports such research and the involvement of consumers in collecting new data. However, we agree that it is essential for informed consent processes to be carried out by an impartial third party; otherwise,, consumers are likely to feel pressure to take part in the research. If the physician conducting the research is their primary health care provider, consumers may also, incorrectly, assume that the invitation to become involved in the research was based purely on their medical needs.

It is also important that consumers have access to the findings that come out of any research involving them, as they are often left out of the loop.

If you wish to discuss any of these issues further, please do not hesitate to contact us.

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