Gut Cancer Foundation Guidelines for Accepting Funding from Pharmaceutical Companies

1. Purpose

These guidelines set out the principles and safeguards Gut Cancer Foundation will apply when considering funding from pharmaceutical companies.

GCF recognises that pharmaceutical companies can make a legitimate contribution to projects that improve information, support, research and outcomes for people affected by gut cancers. GCF must, however, protect its independence, credibility and ability to act solely in the interests of patients, whānau and the wider community.

2. Core principles

GCF may accept pharmaceutical funding where:

- the funding supports GCF's charitable purpose and strategic priorities;
- the funded activity provides a clear benefit to people affected by gut cancers;
- GCF retains full control over the design, delivery and evaluation of the activity;
- the funder has no influence over GCF's clinical, advocacy, research or communications positions;
- the relationship is transparent and can withstand public scrutiny; and
- GCF would be prepared to decline or return the funding if the relationship compromised its independence or reputation.

3. Project-specific funding

As a general rule, pharmaceutical funding should:

- relate to a defined project, service or area of work;
- be supported by an agreed proposal, budget, purpose and reporting framework;
- have measurable outputs or outcomes; and
- not be treated as unrestricted funding for general operating costs.

Exceptions may be considered only with explicit Board approval.

GCF should avoid becoming dependent on pharmaceutical income for the continuation of its core operations. Pharmaceutical funding should form part of a diversified funding model rather than a primary or guaranteed source of income.

4. Independence and editorial control

GCF must retain complete independence over:

- the content of patient information and educational resources;
- public statements and media activity;
- advocacy priorities and submissions;
- research funding decisions;
- service design and referral pathways;
- the selection of clinicians, speakers, researchers or advisers; and

- the publication of project findings or outcomes.

A pharmaceutical funder must not:

- approve, edit or direct GCF content;
- require GCF to promote a company, medicine, product or treatment;
- influence which treatments GCF supports or comments on;
- restrict GCF from advocating for alternative or competing treatments; or
- obtain access to identifiable patient, whānau, donor or service-user information.

Any advocacy undertaken by GCF must continue to be based on clinical evidence and independent advice, including advice from the Scientific Advisory Committee and appropriate clinical groups.

5. Treatment and company neutrality

GCF will not provide preferential treatment to a pharmaceutical company because it has provided funding.

Where appropriate, GCF should:

- seek support from more than one company within a relevant treatment area;
- avoid exclusive relationships unless there is a clear and documented reason;
- describe treatments by their clinical or therapeutic class rather than by brand name;
- apply consistent criteria when engaging with different companies; and
- separate funding discussions from advocacy and clinical decision-making.

Funding must never determine which medicine, company or treatment GCF advocates for.

6. Written agreements

All pharmaceutical funding must be documented through a written agreement that clearly records:

- the purpose and amount of funding;
- the approved use of funds;
- project outputs, timeframes and reporting requirements;
- GCF's ownership and control of project content;
- the absence of editorial or advocacy influence;
- privacy and confidentiality requirements;
- intellectual property arrangements;
- acknowledgement and logo-use requirements;
- any rights to publish or report project results;
- procedures for managing conflicts or disputes; and
- GCF's right to terminate the agreement or return unspent funds.

The agreement must not contain provisions that could reasonably restrict GCF's independence or future advocacy.

7. Transparency and acknowledgement

GCF will be open about pharmaceutical funding.

Funding should be disclosed, where appropriate, through:

GCF's annual report or performance report;

- relevant project reports;
- GCF's website;
- Board reporting; and
- public communications relating to the funded project.

Acknowledgement should be proportionate and factual, for example:

"This project received funding support from [company name]. The funder had no influence over the content, delivery or conclusions of the project."

Use of company logos must be agreed in advance and must not imply endorsement of a company, product or medicine.

8. Due diligence

Before accepting funding, GCF should consider:

- whether the company and proposed relationship align with GCF's values;
- the intended purpose of the funding;
- any actual, potential or perceived conflicts of interest;
- any relevant regulatory, legal or reputational concerns;
- whether the company is involved in a treatment area relevant to GCF's advocacy;
- any conditions attached to the funding;
- the proposed level of acknowledgement or access;
- whether the relationship could affect patient or public confidence; and
- whether GCF could continue the project if the funding were withdrawn.

GCF should also benchmark its approach periodically against other cancer charities and members of relevant sector alliances.

9. Approval requirements

The Executive Officer may progress pharmaceutical funding opportunities that clearly comply with these guidelines.

Board approval should be required where:

- unrestricted funding is proposed;
- the funder requests exclusivity;
- the relationship could reasonably be considered contentious;
- the funding represents a significant proportion of GCF's annual income or the total cost of a project;
- the proposed agreement includes branding, public endorsement or speaking commitments beyond standard acknowledgement;
- the funding relates directly to an active GCF advocacy position involving the funder's product; or

- management identifies a significant reputational or conflict-of-interest risk.

10. Conflicts of interest

Any Board member, staff member, adviser or committee member with a relevant relationship with a pharmaceutical company must declare that interest.

Depending on the nature of the conflict, the person may be required to:

- provide relevant information to the Board;
- refrain from influencing the funding decision;
- leave the discussion while a decision is made; or
- take no part in oversight of the funded activity.

All declarations and decisions should be recorded in the appropriate register and meeting minutes.

11. Patient and service-user information

Pharmaceutical funders must not receive identifiable or potentially identifiable information about patients, whānau, carers, donors or service users.

GCF may provide aggregated and de-identified project information where:

- it is required for legitimate accountability or reporting;
- the information cannot reasonably identify an individual;
- its use is consistent with GCF's privacy obligations; and
- the information does not give the funder commercial access to service users.

Funding must not provide a company with direct access to patients or whānau.

12. Monitoring and reporting

Management will report pharmaceutical funding to the Board, including:

- the funder;
- the amount received or pledged;
- the funded project;
- the period of the agreement;
- any material conditions;
- project progress and expenditure;
- any identified conflicts or concerns; and
- the overall proportion of GCF income received from pharmaceutical companies.

Any attempt by a funder to influence GCF's work must be reported promptly to the Board Chair(s).

13. Ending a funding relationship

GCF may decline, suspend or terminate a pharmaceutical funding relationship where:

- the funder seeks inappropriate influence;
- the agreement is breached;
- new information creates a significant ethical or reputational concern;
- the relationship undermines trust in GCF;
- the project no longer aligns with GCF's charitable purpose; or

- GCF can no longer demonstrate appropriate independence.

GCF must ensure that it is financially and operationally able to forgo funding where continuation would compromise these guidelines.

14. Review

The Board will review these guidelines at least every two years, or earlier if:

- GCF's level of pharmaceutical funding changes materially;
- a significant conflict or reputational issue arises;
- relevant legal or sector guidance changes; or
- benchmarking indicates that additional safeguards are appropriate.