

NFTHD #52: Meeting healthcare professionals outside their workplace

In this Help Desk Note, we explore when it is appropriate to meet with a healthcare professional outside of their workplace. These conversations are nearly always of a nature which are only appropriate to have in a private setting and the most obvious choice is the Clinic or Practice where the HCP works. However, there may be logistical reasons which make it challenging to meet face-to-face with healthcare professionals unless alternative venues are possible.

Let's explore this situation. To clarify, the meetings we are talking about are product-specific and promotional activities. There is a need to have such meetings in a private setting. This ensures we uphold our responsibility to avoid promoting prescription products to the public. A private room in a workplace fits the bill perfectly; but when this cannot happen, do we have other alternatives?

The Code talks about appropriate venues ("a facility should be selected for its appropriateness to enable the activity to be conducted") and whilst this addresses the selection of appropriate venues for company-initiated or sponsored events, the principle remains relevant in this sales-meeting scenario. Proximity to workplace, able to provide modest hospitality, and avoiding recreation or entertainment remain key points to consider, alongside an understanding of how the venue choice could be perceived.

Does the Code rule out any other non-private option? If key criteria is met, it could be reasonable to have a private conversation in a public setting. Importantly – can a conversation safely be had out of earshot from others? This means – assessing the venue, not talking loudly, choosing a discreet place/table in a café, assessing if there is a reasonable chance anyone can overhear those conversations, and making accommodations accordingly.

Another criteria is to ensure any visual aids are out of eyesight from others. It will not be appropriate to use visual aids if they can be overseen by the public; rather, you could provide the visual aids digitally post-meeting. However, it could be possible to use an iPad if the setting was a corner booth which cannot be overseen by others.

If making a choice to meet offsite, preface that decision by making clear to the healthcare professional the importance of privacy. Clarity goes along way – it signals your understanding of working ethically whilst also demonstrating a commitment to working within the regulatory environment which oversees our interactions.

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Its also worth noting there have been multiple complaints in the past about venue choices being inappropriate. The Code Committee have asserted that companies should document the venue options considered and the rationale for the selection of a particular venue, which must be made available to the Code Committee if a complaint is lodged. Adding to this, promotional or educational meetings should be held in a private room but acknowledged there are circumstances where this may not be feasible. In such circumstances, companies should demonstrate a robust approach to ensuring privacy of the meeting is maintained.

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