

Good Practice Guide - Quality Inclusions for Staff Education Policies

Medicines Australia's members are committed to ensuring relevant personnel are appropriately trained on the Code of Conduct and maintain a high standard of ethical conduct and professionalism in the discharge of their duties. As such, member companies have appropriate policies and procedures to demonstrate compliance with Section 9 of Edition 20 of the Code of Conduct, in relation to Company Representative Training.

The Code articulates a requirement for completion of an endorsed Medicines Australia Training Program. At present, there is only one endorsed program: The Continuing Education Program (CEP) offered through the University of Tasmania. This Guide is written to support the development of internal company policies and procedures that reference the CEP.

Purpose of this Guide



This Guide has been prepared to assist companies to develop a robust and compliant approach to ensuring relevant personnel are appropriately trained on the Medicines Australia Code of Conduct.

This Guide has been informed by the Medicines Australia Monitoring Committee, which proactively monitors compliance of member companies. Having recently monitored company training policies and procedures, the Committee made some general recommendations, alongside some benchmark inclusions, that makes for a strong policy and procedural approach.

The suggested inclusions in this Guide are not necessarily mandatory, but they represent a robust approach to Company Representative Training, and should be considered when developing new, or updating existing policies and procedures. This Guide should provide an opportunity for companies to strengthen their frameworks and support best practice across appropriate staff training.

It is reasonable to expect a large company to have a more thorough policy/procedure approach than a smaller company, for example. The policy needs to suit the size and nature of the company to ensure that its implementation is appropriate and realistic.

Key inclusions

Clarity about roles and relevant modules

Any robust policy will articulate clearly what roles need to complete which of the CEP programs. There is differentiation between Program 1 and the other Programs and this should be explained in any company approach.

The below is an example only - companies should decide which roles should undertake which program.

Position at PharmaABC	Mandatory requirements
All Sales Managers All Sales Representatives	Entire CEP (Medicines Australia Programs 1 through to 6) *must enrol within the first six months of employment, and complete the full program within two years
<ul style="list-style-type: none">• Marketing + customer engagement• Internal Legal and regulatory personnel• Compliance team• Communications team• Learning and development staff• Selected market access positions• Medical Science Liaison	Medicines Australia Program 1 only (Code of Conduct) *must complete within the first 12 months of commencement of employment



"Company employees, and anyone acting on behalf of a Company, will be appropriately trained on the Code and maintain a high standard of ethical conduct and professionalism in the discharge of their duties"

CODE OF CONDUCT EDITION 20, OVERARCHING PRINCIPLE 4

Good governance and policy housekeeping

- All company policies should be reviewed by and formally ratified or endorsed by senior leadership, and governing bodies where appropriate. Final accountability rests with senior leadership and as such it is vital that they are fully aware of their responsibilities in this regard.
- Similarly, any policy or procedure needs to articulate lines of responsibility and reporting lines. It should be very clear about who 'owns' responsibility for ensuring that all staff are adequately meeting CEP requirements.
- All policies need a regular review cycle, which should be stated on the policy. For CEP requirements, a 1-3 year review interval is adequate, whilst stretching policy reviews to 5 years is less appropriate.

Tracking employees between roles

CEP policy and procedures should address the need to educate employees who move between roles within a company. It is relatively easy to address CEP requirements in the onboarding procedures of new personnel, however similar checks need to be triggered when a person moves between roles inside a company. For example, a personal assistant may move into a sales role, which would require that person to undertake CEP. This is to be included in company documentation, as appropriate.

CEP Coordination

A central CEP Coordinator (or equivalent) provides central coordination of CEP training for personnel within a company. Companies who have a CEP Coordinator tend to have the most robust policies and procedures, with a dedicated person assigned to overseeing all-things-CEP, including student engagement. This does not need to be a dedicated position, rather an assigned responsibility to an appropriate person within a company. That person is largely involved with implementing the policy and procedures, and contributing to a supporting workplace culture that fosters the importance of CEP.

"We find that companies whose Coordinators actively monitor enrolments and progress have better outcomes: fewer people forgetting to enrol, forgetting to start, or not finishing."

- DR TRISTAN LING, CEP ACADEMIC LEAD AT UTAS

Empower your policy with supporting procedures

- Any policy needs to be supported by, and operationalised through, documented procedures that explain how that policy is implemented in practice. Similarly, any policy needs to be socialised amongst relevant personnel and supported by positive workplace culture. Without taking this holistic approach to Company Representative Training, a policy can only do so much. It is the effective combination of all these elements that work together to help a company ensure all its relevant personnel are trained appropriately and in compliance with the Code.
- This could be a stand-alone procedure, or a multi-pronged approach involving many different procedures. A procedure might reference various internal procedures such as how training is included in induction, performance review, professional development processes or annual compliance internal audits (for example).
- When complicated, flow charts and diagrams can be useful to describe the ways in which a company ensures compliance with the CEP requirements. Any procedure needs to be clearly understood by company personnel.
- Your company may have a register of all company representative training, as relevant to their roles. Your policy or procedures would then affirm the purpose of the register and explain how it remains updated, noting that a register alone does not constitute a policy or procedure.

Audit processes

- An internal audit mechanism, or monitoring function, should be included in your CEP policy/procedures. The purpose of an internal audit is to self-assess compliance of practice with policy. It is only through a regular audit mechanism that a company can be assured that their policy/procedures are being implemented effectively.
- Any internal audit should exist outside the usual business cycle – a suggested annual audit is reasonable.
- It is advisable that this ‘checking’ function be undertaken by a person outside the sales business unit, preferably within a compliance/risk business unit. The principle is that the person monitoring for compliance should not be the same person responsible for implementing the CEP requirements in the first instance.

DID YOU KNOW?

The current service provider (UTAS) has a comprehensive system to track staff’s CEP, providing up-to-date information on progression and grades. It can help monitor engagement with the training, assist with employee welfare, and feed into an internal company audit.

Risk management

- Identify the risk of not meeting CEP requirements. Reflect this risk in company risk matrixes or frameworks.
- Develop and articulate strategies to mitigate such risks. Reference that risk in your policy/procedure, as it forms part of a holistic company approach.



Have you considered putting in place a dual approach of incentivising success in the CEP program, as well as making students accountable for completion? For example, rewarding high grades or CEP Award winners, and requiring individuals to pay re-enrolment fees if they don't pass.

Keeping staff updated with an evolving Code

- A reference to ongoing education should be included in in your CEP policy/procedures. There is value in going beyond the minimum CEP requirements and offering employees additional training opportunities such as the Bridging course, MA’s public Code information sessions, internal training, internal meeting reflections etc.
- Policies should explicitly define their expectations of the need for continuing education, for example “undertake the Bridging Course for every new Code Edition”, or “undertake the Code of Conduct Program 1 again if it has been longer than 10 years since completion”. Avoid vague terms such as “up-to-date”, unless they are accompanied by a definition.
- The Code does not define how a company should ensure their staff’s knowledge remains current and relevant, because Code refresher/bridging courses are not mandatory. However, companies need to ensure that their staff are adequately trained, and their understanding of the Code is in line with the current Edition.