



Κυπριακή Ένωση Φαρμακευτικών Εταιρειών Έρευνας και Ανάπτυξης
Cyprus Association of Research and Development Pharmaceutical Companies

GUIDANCE FOR ENGAGING ACADEMIC STAFF WHO WORK AT THE UNIVERSITY OF CYPRUS (UCY)

Following clarification received from OKYPY on 17 October 2023 and from UCY on 20 October 2023 via email (attached to this guidance as Annex A and B respectively), KEFEA sets out the following guidance with regard to interactions between its members and academic staff who are employed by UCY (“Academics”):

1. Contracts between KEFEA members and Academics are only allowed if such services:
 - (i) are provided for the purpose of supporting healthcare, research or education; and
 - (ii) do not constitute an inducement to recommend and/or prescribe, purchase, supply, sell or administer specific Medicinal Products.
2. It is permitted to contract Academics or as consultants, whether in groups or individually, for services such as speaking at and/or chairing meetings, involvement in medical/scientific studies, clinical trials or training services, participation at advisory board meetings, and participation in market research where such participation involves remuneration and/or hospitality.
3. The arrangements that cover these genuine consultancy or other services must, to the extent relevant to the particular arrangement, fulfil all the following criteria:
 - a. a written contract is agreed in advance of the commencement of the services which specifies the nature of the services to be provided and, subject to clause (h) below, the basis for payment of those services;
 - b. a legitimate need for the services has been clearly identified and documented in advance of requesting the services and entering into arrangements;
 - c. the criteria for selecting consultants are directly related to the identified need, which may include clinical experience in the treatment, product, and/or in the relevant scientific issue, the prospective consultant’s scientific reputation, his/her academic work and/or his/her publications;
 - d. the persons responsible for selecting the consultants have the expertise necessary to evaluate whether the particular consultant meets those criteria;
 - e. the number of consultants retained and the extent of the service are not greater than reasonably necessary to achieve the identified need;
 - f. the contracting KEFEA member maintains records concerning, and makes appropriate use of, the services provided by consultants;
 - g. the engagement of the consultant to provide the relevant service is not an inducement to recommend and/or prescribe, purchase, supply, sell or administer a particular medicinal product;



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- h. the remuneration for the services is reasonable and reflects the fair market value of the services provided. In this regard, token consultancy arrangements must not be used to justify compensating the Academics;
- i. Compensation for Academics who are HCPs based in Cyprus must be calculated with a threshold of not more than €170 per hour and for Academics who are HCPs based outside Cyprus must be calculated with the threshold in the country of practice of the HCP.
4. It has been made clear to us that Academics, even when providing clinical services to OKYPY hospitals under an agreement between UCY and OKYPY, do not fall within the definition of a Cyprus Government Official. As such, engaging them does not fall under private employment. Therefore they do not require prior approval by the Minister of Labour. Nor, where they are also HCPs, do they fall within the scope of the OKYPY circular dated 10 February 2020 and with a reference 4.06.003.001.
 5. However, Academics fall within the scope of circular 4.8 of UCY (attached as Annex C), and all procedures therein must be followed when either **engaging or contributing to the costs of events and sponsorship** such Academics. Care must be taken by KEFEA members to ensure that the approvals on the basis of this circular have been procured.
 6. In their written contracts with Academics, KEFEA members must include provisions regarding the obligation of the consultants to declare that they are consultants to the KEFEA member whenever they write or speak in public about a matter that is the subject of the agreement or any other matter relating to that KEFEA member.
 7. Limited market research, such as one-off phone interviews or mail/e-mail/internet questionnaires still falls within the scope of circular 4.8, even if the remuneration is minimal. “Minimal” remuneration means that there is an absolute cap of 3 hours’ remuneration.

It is noted that the above guidance is in addition to the KEFEA Code of Conduct, as adopted by the KEFEA Board of Directors on 15 December 2022.