

2012 APEC Advanced Workshop of Good Review Practice on Medical Products

# Transparency and interaction with the public and other stakeholders

Mike Ward Chair, APEC RHSC



6 Nov 2012, 40th APEC EGEE&C Meeting & Workshop, Chinese Taipei

#### Transparency: what, why, how

- Transparency and openness a growing priority of governments and public institutions; also an important issue for private sector
- Reflects increasing demands by the public to understandable information upon which they can make informed decisions
- Equally important in ensuring accountability and predictability and fundamental principles of participatory democracy – being able to participate and influence processes, policy and outcomes
- Definitions:
  - Openness: inviting, hearing, considering and sharing of information in conduct of one's business
  - Transparency: facilitating access to and understanding of information and processes used to conduct one's business

### The larger context

#### **Open Government Partnership**



**Open Government Partnership (OGP)** was launched on September 20, 2011, as a multilateral initiative led by the US and Brazil.

Initiative aims to secure concrete commitments from governments to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance.

- Overseen by multi-stakeholder International Steering Committee comprised of government (8 original country members) and civil society representatives
- Canada one of 42 countries to have announced their intent to become OGP member countries in April 2012

#### **Principles**

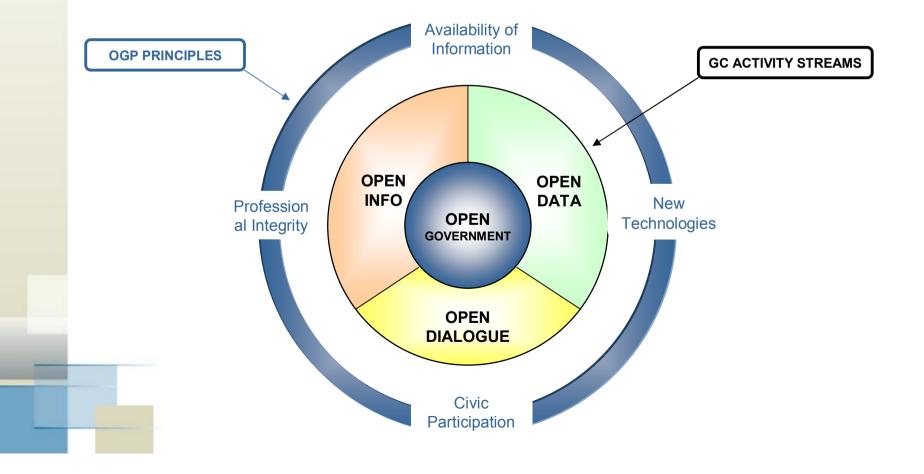
- People have a right to seek information collected and held on their behalf
- Commit to pro-actively provide high value information (including raw data) in formats public can easily locate, understand and in formats that facilitate reuse.
- Commit to seek feedback from public to identify information of greatest value
- Implement highest standards of professional integrity
- Harness power of new technologies to promote information sharing, public participation and collaboration
- NB Information sharing and collaboration is about behaviours not technology complement, not substitute for clear, useful information

#### **Cultural Shift**

- From permission-based culture to new service design and delivery model: citizen and business-centric services
- Understanding that we are simply custodians of information in our possession: public asset
- Should be available to public to view, use, analyze for their own personal or commercial purposes
- Created and gathered with use of tax dollars; public assumption that disclosure should prevail (commercial confidential and personal information excepted)
- Notions of ownership, control, and need-to-know change to information stewardship, need-to-share and sharing of information in a responsible manner

## Aligning the GC Open Government Initiative with the Open Government Partnership

• The four core OGP principles are consistent with Canada's current open government initiative with its focus on three streams of activity - open data, open information, open dialogue.



Considerations within the regulatory context

- Broad scope:
  - Policies, laws, regulations, guidelines
  - Product and site related information (including tracking, product dbases, ACs)
  - Process related information
  - Appeal/dispute resolution mechanisms
  - Annual reports
  - FOI/ATI (NB reactive approach)
- Product life cycle
  - Clinical trial registries -> public assessment reports/redacted review reports and risk communications

#### Considerations

- Is the information we produce understandable?
  - Plain language
- Is it used, and effective in achieving the desired outcome? How do we know?
- Is it readily accessible?
  - Single window, searchable
- Who is (are) the target audiences?
- What steps could we take that would add the greatest value for the investment?
- Need for clear principles and business rules
- Is there ever too much transparency?

#### **GRevP** implications

- Concept of citizen and business-centric services
   →Quality System approach
- Implementation of effective GRevPs should increase public confidence and trust
- In turn, demands for increased transparency influences the way we approach our work

#### Challenges

- Citizens particularly interested in matters related to their health; demands for increased transparency and involvement will only increase
- At same time, must strike a balance that allows for the protection of legitimate commercial interests, product development and innovation – is this balance shifting?
- Multiple clients, including internal, external stakeholders with different needs, and an emerging cliental of fellow regulatory authorities
- Increased transparency comes at a cost: not resource neutral; may also require legislative changes