

	POLICY Number: 7311-20-011 Title: VENDOR VISITATION AND CONDUCT
Authorization <input type="checkbox"/> President and CEO <input checked="" type="checkbox"/> Vice President, Finance and Corporate Services	Source: Director, Supply Chain Management Cross Index: 7311-10-001; 7311-10-002; 7311-20-008 7311-75-003, 7311-40-002 Date Approved: August 9, 2012 Date Revised: October 20, 2015 Date Effective: October 22, 2015 Date Reaffirmed: Scope: SHR

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OVERVIEW

Saskatoon Health Region's (SHR's) Provincial Procurement Policy outlines SHR's approach to procurement of clinical and non-clinical goods and services. This policy speaks to vendor visitation and conduct in SHR facilities.

DEFINITIONS

All (SHR) staff means SHR employees, practitioner staff (including physicians), professional staff, students and volunteers.

Observership means to view techniques/approaches of SHR staff (with no intention of providing technical assistance).

Technical assistance means to work under the direction of a physician and/or SHR staff to provide support with a piece of equipment.

Vendor (Vendor Representative) means any individual representing an organization and/or acting on his or her own behalf, who visits SHR facilities/premises for the purpose of marketing, selling, providing education or promoting the exchange of goods or services to SHR staff and/or patients. This includes vendors that currently or potentially have business/healthcare related activity with SHR. This definition of vendors does not include vendors who provide various retail goods within common areas of SHR facilities.

1. PURPOSE

The purpose of this policy is to establish SHR's requirements for staff when initiating/conducting business/healthcare/education related activities with vendors. It also establishes SHR's requirements from vendors while conducting business/healthcare/education related activities within a SHR site/facility.

2.

PRINCIPLES

- 2.1 SHR has the authority to control and manage all business and healthcare related activities within all SHR owned, operated and leased facilities.
- 2.2 Vendors offer value to SHR in terms of technology, advancement and education.
- 2.3 Vendor actions may have a direct impact on quality control, infection control, patient safety, patient's rights to privacy.
- 2.4 SHR recognizes the benefits that vendors offer in accomplishing SHR's strategic directions.

3. POLICY

- 3.1 SHR has an obligation to protect a patient/client/resident's legal right to privacy.
- 3.2 The minimum required approval level, to authorize a visit/meeting with a vendor is the manager or designate of the respective department/unit/sector.
- 3.3 Physicians and managers (or designates) may request and/or approve of the presence of a vendor during a medical procedure if it is anticipated that technical assistance may be required. Any vendors present to provide technical assistance must sign, or must have already signed, a *Vendor Access Agreement* (see Appendix B).
- 3.4 Vendor observation of medical procedures is not permitted.
- 3.5 All vendors who attend SHR facilities shall conduct vendor business/ health care activity in accordance with this policy and the attached Vendor Regulations (see Appendix A).
- 3.6 This policy, in its entirety, shall be made available to all vendors initiating or receiving contact with SHR staff.
- 3.7 In cases of policy violation, the authority to permit and deny vendor access to SHR sites/facilities rests with the Director, Supply Chain Management.

4. ROLES AND RESPONSIBILITIES

4.1 All Staff

- 4.1.1 Provide this policy and Vendor Access Agreement to all current/potential vendors (or advise vendor to proceed to a Supply Chain Management office prior to first visit).
- 4.1.2 Report incidents of vendor breaches/violations and any other inappropriate behavior (wandering halls, looking through cupboards, opening sterile supplies) to Supply Chain Management see Appendix C).
- 4.1.3 Ensure vendors adhere to SHR policies as applicable.

4.2 Physicians, Directors and Managers (or designates)

- 4.2.1 Approve/deny requests (from staff and from vendors) for a vendor visitation/meeting.
- 4.2.2 Physicians cannot make or enter into agreements with vendors on behalf of SHR without SHR approval.

4.3 Vendors

- 4.3.1 Comply with Vendor/Vendor Representative Regulations attached (see Appendix A).

4.4 Director, Supply Chain Management

- 4.4.1 Receive and assess all vendor breach/violation reports.
- 4.4.2 Determine vendor consequence in accordance with this policy.
- 4.4.3 Advise vendor of breach/violation.
- 4.4.4 Determine/consider external stakeholders; notify as required.
- 4.4.5 Consult with the Director, Pharmacy Services in matters relating to pharmaceutical vendors.

5. POLICY MANAGEMENT

The management of this policy including policy education, monitoring, implementation and amendment is the responsibility of the Director, Supply Chain Management.

6. NON-COMPLIANCE/BREACH

Meeting with vendors outside the parameters of this policy puts SHR at risk. Non-compliance with this policy may result in disciplinary action, up to and including termination of employment and or privileges with SHR.

7. REFERENCES

Sales Reps in the Heart Investigation Unit Oct. 2005(Hamilton Health Sciences) *Guideline for Industry Reps* Nov. 2006 (Hotel-Dieu Grace Hospital) Pharmacy & Therapeutics Committee (Vanderbilt Pharmaceutical Services).

PROCEDURE

Number: 7311-20-011

Title: VENDOR VISITATION AND CONDUCT

Authorization

- President and CEO
 Vice President, Finance and Corporate Services

Source: Director, Supply Chain Management
Cross Index: 7311-20-008
Date Approved: August 9, 2012
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Scope: SHR

1. PURPOSE

The purpose of this procedure is to provide guidance to staff when faced with situations requiring or involving vendors.

2. PRINCIPLES

- 2.1** SHR practices fair and equitable decision making regarding interaction with vendors.
- 2.2** SHR is committed to respecting and ensuring privacy and confidentiality for all patients including personal health information.
- 2.3** SHR promotes safe work practices, consultation, education, communication and partnerships.

3. PROCEDURE

3.1 Contact Supply Chain Management prior to initiating procurement of any clinical or non-clinical goods or services from a vendor (see SHR Policy *Provincial Procurement*).

- If the department Manager, Purchasing or the Contracts and Procurement Specialist(s) determine that procurement of a clinical and or non-clinical good and/or service through a vendor is appropriate, the following applies.

3.1.1 Staff obtain approval from the Manager or designate of the department/unit.

3.1.2 Schedule meeting with the vendor.

3.1.3 Advise vendor of the following:

- ID Requirements: while attending an SHR facility, vendors are required to wear identification that indicates their name and the name of the company they represent.
- SHR has a *Vendor Visitation and Conduct Policy and Vendor Regulations* that must be reviewed prior to first meeting.

- SHR requires a signed *Vendor Access Agreement* on file for all Vendors. Staff/Physicians may direct vendors to RUH Supply Chain Management. Supply Chain Management staff will review the policy/regulations and obtain a signed *Vendor Access Agreement* with the vendor. All Vendor Access Agreements are stored and administered by Supply Chain Management, RUH.

Upon request, Supply Chain Management will advise, the appropriate SHR staff member/physician that the policy and regulations have been reviewed with the vendor and the vendor has signed the Vendor Access Agreement.

Alternatively, at the first meeting with the vendor, staff may, present the vendor with SHR *Vendor Visitation and Conduct Policy, Vendor Regulations (Appendix A) and the Vendor Access Agreement (Appendix B)*. Staff then obtain signature on the Vendor Access Agreement then forward to Supply Chain Management main office at Royal University Hospital (RUH).

3.2 Vendor Initiated Contact

(e.g. staff approached by a vendor (telephone or in person) without an appointment.)

- 3.2.1 Advise vendors that SHR policy states vendors may meet with SHR staff by appointment only.
- 3.2.2 Direct the vendor to Supply Chain Management or site leader (if there is no Supply Chain Management on site).
- 3.2.3 Supply Chain Management /site leader (if there is no Supply Chain Management on site) provides vendor with a copy of SHR Vendor Visitation Policy, Vendor Regulations and Vendor Access Agreement, advises vendors that appointments are required and of SHR's identification requirements.

3.3 Reporting Vendor Breaches/Violations

- 3.3.1 SHR staff are obligated to report vendors in breach of this policy; e.g.: conducting departmental visit without an appointment. Methods of reporting are as follows:
 - contact Supply Chain Management.
 - online reporting; see link on Supply Chain Management website under "on-line forms"
 - forms also available from Supply Chain Management general office.
- 3.3.2 Director, Supply Chain Management receives information and addresses reports from staff/physicians if vendors fail to comply with the regulations governing the conduct of their business activities within SHR

3.4 Vendor Technical Assistance

Physicians and managers may request and/or approve of the presence of a vendor during a medical procedure for the purposes of technical assistance.

- 3.4.1 Ensure vendors attending an Operating Room (OR) have adhered to approved surgical team preparation (see *Infection Prevention and Control Manual*, Surgical Site Infections – Preventions Policy (see Surgical Team Preparation)).

4. PROCEDURE MANAGEMENT

The management of this procedure including procedure education, monitoring, implementation and amendment is the responsibility of the Director, Supply Chain Management.

5. NON-COMPLIANCE/BREACH

Meeting with vendors outside the parameters of this procedure put SHR at risk. Non-compliance with this procedure may result in disciplinary action, up to and including termination of employment with SHR.

6. REFERENCES

SHR Policy Provincial Procurement

VENDOR REGULATIONS

Appointments – All Departments/Units/Sectors

- 1.1 Vendors shall meet with SHR staff **by appointment only**.
- 1.2 Appointments must be scheduled in advance.
 - 1.2.1 Vendors are not permitted to page physicians and staff or otherwise seek out or wait for their attention in SHR facilities other than through a previously arranged appointment.
 - 1.2.2 Vendors shall not visit nursing units, doctor's lounges or other clinical areas unless prior arrangements have been made to conduct special demonstrations or presentations.
 - 1.2.3 All contact with staff in a unit or clinical area must have prior approval of the Manager, or designate of the unit/clinical area.
- 1.3 Appointments are coordinated directly with the dept/unit/sector that a vendor intends on visiting. A contact phone number should be left with that dept/unit/sector at time of appointment booking.
 - 1.3.1 The office with which the appointment was made will contact the representative if an appointment must be cancelled or rescheduled. Vendors are required to notify the office with which they booked an appointment if they are unable to make a scheduled visit.
- 1.4 Vendors must confine their business activities within scheduled appointment times.
- 1.5 When arranging appointments, vendor shall clearly state the purpose of their visit and provide a contact number where they can be reached.

Access Agreement

- 1.6 All vendors are required to read and sign a *Vendor Access Agreement* (Appendix B) prior to or at the first meeting with an SHR employee and prior to doing business with SHR.
 - 1.6.1 If a vendor has not signed this agreement, they are only permitted to conduct business with the office of Supply Chain Management.

Identification

- 1.7 While attending an SHR facility, vendors must wear identification that indicates their name and the name of the company they represent

Conduct

- 1.8 Vendor contact shall not include hands on care.
 - 1.8.1 Vendors with specialized training may assist with technologies and provide technical support to physicians and staff at the request of the physician/staff for safe use of equipment and/or infrequently used equipment and/or product.

1.8.2 All vendors must maintain current liability insurance coverage and must produce proof of such coverage upon request by SHR.

1.9 Vendors shall not interfere with the well being, comfort and privacy of patients.

1.10 Vendors shall comply with Infection Prevention Control standards as instructed by SHR staff.

Education Sessions/Material

1.11 Promotional, educational or instructional material may be dropped off at the Department of Supply Chain Management without a scheduled appointment.

1.12 Arrangements for vendors to conduct educational sessions or drop off promotional or instructional material for medical, nursing or other appropriate staff must be made in advance with the office or contact individual within Saskatoon Health Region.

Supply Chain Management

1.13 Appointments with Supply Chain Management staff may be made with the staff appropriate to the type of information to be discussed.

1.14 Scheduled appointments with Supply Chain Management staff are not required but will ensure that the vendors will be seen promptly.

Pharmaceutical Sales Representatives

1.15 Distribution of medications to in-patients must be coordinated through the Department of Pharmaceutical Services. Sample medications intended for use on an in-patient basis must be left with the pharmacy and not on nursing units or with physicians.

1.16 Sample medications intended for use on an out-patient basis may be left with physicians. The physician is responsible for the safe and appropriate storage of the medication, the monitoring of expiration dates and proper disposal of the samples.

1.17 Promotional, educational or instructional material may be dropped off at the Department of Pharmaceutical Services without a scheduled appointment.

Non-Compliance

1.18 Non-compliance with these regulations will result in an assessment of the violation, a discussion with the vendor regarding the violation, accompanied by a review of the regulations with the vendor.

A second violation of the regulations may result in an immediate ban from SHR for a time period of no less than 30 days and revocation of vendor visitation privileges.

Third violation of this policy may result in a further ban of vendor visitation privileges for time periods of no less than 6 months to one year.

VENDOR ACCESS AGREEMENT

Vendor Name

Company Name, Address, Phone Number

WHEREAS:

- A. As an individual vendor/vendor representative providing services to the Saskatoon Health Region, I understand that I may have access to confidential information that includes, but is not limited to, information relating to:
- Patients (such as health records, conversations, admittance information, patient financial information, etc.);
 - Other Saskatoon Health Region employees or volunteers (such as salaries, employment records, disciplinary actions, etc.);
 - Saskatoon Health Region business information (such as financial and statistical records, strategic plans, internal reports, memos, contracts, peer review information, communications, proprietary computer programs, source code, proprietary technology, etc.); and
 - Information about Saskatoon Health Region's business partners and service providers.
- B. Confidential information is protected by legislation such as *The Health Information Protection Act* and *The Mental Health Act*, as well as by strict Saskatoon Health Region policies.

As a condition of and in consideration of my access to confidential information, I promise that:

BASIC CONFIDENTIALITY OBLIGATIONS

1. I will use confidential information only as needed to perform my legitimate duties with the Saskatoon Health Region. This means, among other things, that:
- (a) I will only access confidential information for which I have a need to know in connection with the services I am providing to the Saskatoon Health Region;
 - (b) I will not in any way divulge, copy, release, sell, loan, review, alter or destroy any confidential information except as properly authorized within the scope of my duties with the Saskatoon Health Region; and
 - (c) I will not misuse confidential information or carelessly care for confidential information.

2. I will safeguard and will not disclose or share my passwords, User ID's, clearance badges, access cards, keys or other codes or devices assigned to me (or created by me) that allow me to access confidential information. I accept responsibility for all activities undertaken using such codes and devices.
3. I agree that my privileges hereunder are subject to periodic review and, if deemed appropriate by the Saskatoon Health Region, revision.
4. I agree that I have no right or ownership interest in any confidential information.
5. I understand that my failure to comply with this Agreement may result in legal action being taken against me as well as the organization that I represent.
6. I agree to review and comply with all provisions of *The Health Information Protection Act*.
7. I agree to review and comply with all Saskatoon Health Region Infection Prevention and Control requirements.
8. I agree to maintain liability insurance coverage and agree to produce proof thereof upon request by SHR.

GENERAL

9. The obligations contained in this Agreement are intended to be complementary to professional ethical obligations. To the extent of any inconsistency between such obligations, the obligations imposing the highest confidentiality standard shall govern.
10. I agree that my obligations under this Agreement will continue after any termination of or affiliation with the Saskatoon Health Region.

AGREED TO BY:

Vendor Signature

Date

Printed Name and Position

Witness Signature



SUPPLY CHAIN MANAGEMENT

Vendor Breach Report

Reporting Vendor Breach

The purpose of this form is to assist staff in notifying Supply Chain Management of any vendor/vendor representative breaches.

Staff are obligated to inform Supply Chain Management of vendor breaches so that they are aware of the breach. Notifying Supply Chain Management will result in a discussion and assessment of the incident with the vendor, in attempt to avoid repeat incidents. Supply Chain Management may also be able to provide advice or guidance to your department/unit/sector that may be helpful in responding to the breach.

Date of Report	
Vendor Name and Company Name	
Date of Breach	
Area of Occurrence	
Description of Events	

Please submit this form to Supply Chain Management by one of these means of notification: E-mail or inter-hospital mail to Director, Supply Chain Management c/o RUH.

If you wish to speak to someone about this breach, please call
Supply Chain Management Office @ 655-1672.