

14 November 2011

Secretary Code of Conduct Committee
Medicines Australia
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To whom it may concern,

The Mental Health Council of Australia (MHCA) is pleased to be able to contribute the views of the Australian mental health sector to the Review of the Medicines Australia Code of Conduct.

The MHCA is the peak, national non-government organisation representing and promoting the interests of the Australian mental health sector, committed to achieving better mental health for all Australians. The membership of the MHCA includes national organisations of mental health services, consumers, carers, special needs groups, clinical service providers, community and private mental health service providers, national research institutions and state/territory peak bodies.

Medicines play an important part in the maintenance and treatment of mental illness for Australians living with mental illness, and it is for this reason that the MHCA has a keen interest in the governance structures which oversee the conduct of the Australian innovative pharmaceutical sector.

As the peak industry body for the Australian innovative pharmaceutical sector, Medicines Australia holds an important leadership position in Australian medicines policy-making and governance. We commend Medicines Australia for detailing an extensive, principled Code of Conduct that supports and nurtures a strong ethical and self-regulating culture for the Australian innovative pharmaceutical sector. The Code provides a comprehensive mechanism for setting minimum standards of ethical and self-regulating behaviour for the pharmaceutical industry.

The MHCA would like to specifically acknowledge the key components that are intended to underpin relationships with Health Consumer Organisations and patients, including respect for independence; achieving and maintaining public trust; fairness; openness and transparency; and accountability. The MHCA believes that the best policies and processes in health and medicines governance and policy-making exemplify these aforementioned principles. We would also encourage Medicines Australia, however, to consider including consumer-orientation as one of the essential components to relationships with Health Consumer Organisations and patients.

The concept of consumer-orientation is embedded within key national health and medicines policy documents including the National Medicines Policy, the National Strategy for Quality Use of Medicines and the Fourth National Mental Health Plan, and it is widely acknowledged the having consumers at the centre of the health service system and policy-making and governance processes will result in better outcomes for health consumers. For these reasons, the MHCA would encourage Medicines Australia to adopt these sentiments in its Code of Conduct and commit to reorienting its work to support the engagement of consumers across all aspects of its work.

We would similarly recommend Medicines Australia consider how it might better engage carer organisations across all aspects of its work. In the mental health space, carers frequently play a vital role in supporting the safe and appropriate use of medicines, and this important role needs to be appropriately and adequately recognised across all medicines policy-making and governance decision-making processes. Supporting the inclusion of carer views across all aspects of medicines decision-making will also likely improve health outcomes for Australians with experience of mental illness.

The Mental Health Consumer and Carer Participation Policy developed by the National Mental Health Consumer and Carer Forum is a useful reference tool in relation to informing the inclusion of mental health consumers and carers in decision-making processes. An electronic version of the Policy can be found at <http://nmhccf.org.au/documents/ConsumerandCarerParticipationPolicy.pdf>.

Thank you for the opportunity to contribute to the Review of the Medicines Australia Code of Conduct. Should you require any further information in relation to our comments, please do not hesitate to contact either myself or MHCA Policy and Project Officer, Kate Judd.

We look forward to seeing the final version of the Code of Conduct.

Yours sincerely,



Frank Quinlan
Chief Executive Officer
Mental Health Council of Australia