

Policy

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Supplier Visitation and Interaction Policy

Purpose

The purpose of this Policy is to establish Cleveland Clinic Abu Dhabi's expectations with respect to Suppliers and Medical Representatives' requirements and ethics, while on the premises; to ensure that Suppliers and Medical Representatives are compliant and credentialed within the organization; and define the appropriate channels for access to the areas of care; and the expectations of appropriate behavior.

Policy

Policy Statements

Suppliers that conduct business at or with CCAD, will do so in accordance with the Policy guidelines. All Caregivers shall interact with Suppliers in a manner that meets ethical standards, protects patient confidentiality, does not interfere with the process of patient care, and encourages the appropriate, efficient and cost-effective use of equipment, supplies and pharmaceuticals within CCAD.

It is the responsibility of all Caregivers to monitor and assure that Suppliers are compliant with these guidelines.

Policy Purpose

- To establish regulations for Suppliers doing business with CCAD.
- To provide guidelines for Caregivers when interacting with Suppliers.
- To assure appropriate identification of all Suppliers visiting CCAD.
- To minimise interruption of patient care and Caregiver's productivity.
- To improve the safety and security of our patients, Caregivers and property.
- To ensure that association with Suppliers is consistent with CCAD's objectives.
- To specify a mechanism to enforce the policy.

Policy Standards

All Caregivers are expected to uphold the highest ethical standards in their interactions with all Suppliers. Caregivers are also responsible for reporting violations of this Policy to Supply Chain Vendor Management Team @ SupplierRelations@ClevelandClinicAbuDhabi.ae or the CCAD Ethics and Compliance Team @ Compliance@ClevelandClinicAbuDhabi.ae

Roles and Responsibilities

Responsible	Subject
Caregivers	All Caregivers are responsible for assuring that Suppliers interacting with the organization comply with this policy. Non-compliant Suppliers are to be reported immediately to: SupplierRelations@ClevelandClinicAbuDhabi.ae
Protective Services / Security Personnel	Security Personnel may, at any time, request to inspect a Supplier's identification / visitor badge. Suppliers, without a proper identification badge, will be escorted to the check-in area to complete the formalities, provided their visit is verified and approved. Uncooperative Suppliers or those in violation of the Policy, may be escorted off the premises.
Supply Chain Management (SCM)	Assigned Supply Chain Representatives are responsible for coordinating all "Caregiver-Supplier" interactions related to visit scheduling, products, materials, presentations, services, samples, clinical support and other inquiries related to Supply Chain. The designated person in the Vendor Management Team is responsible to investigate any reported violations of this Policy. <ul style="list-style-type: none">• Suppliers are advised to send their visitation request, with a brief description of the purpose of visit, to: SupplierRelations@ClevelandClinicAbuDhabi.ae

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	<ul style="list-style-type: none">• Suppliers who fail to comply with the policy requirements, may be subjected to loss of business privilege at CCAD and M42. <p>CCAD Vendor Management Team and M42 Supplier Relationship Management Team reserve the right to restrict the representative and the company they represent, from CCAD and M42 assets.</p> <p>The Supply Chain Procurement Director will determine the appropriate disciplinary action, in conjunction with appropriate parties, as required.</p> <p>Caregivers who are non-compliant or not supportive of this policy, will be reported to their Line Manager for action. Depending on the severity of the situation, disciplinary action can be taken, which may include termination for gross misconducts.</p>
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Procedure

1. CCAD has a designated check-in / security reception for Suppliers, which is managed by the Protective Services Team. Suppliers are only permitted to visit the facility or Caregiver by appointment and approval.
 - 1.1. All Suppliers are required to check-in at the designated security reception and receive a visitor badge or pass, before proceeding to the department or assigned visit location.
 - 1.2. Suppliers who show up at the facility, without checking in at the designated area and without a valid identification, will be asked to leave the facility, or be requested to return to the designated area to check-in and receive proper identification, provided their visit is verified and approved.
 - 1.3. If a Supplier does not adhere to this policy, appropriate action will be taken, which may include limiting new business with the company.
 - 1.4. Advice or clarification on this policy may be obtained from the Supplier support team, by requesting at SupplierRelations@ClevelandClinicAbuDhabi.ae
 - 1.5. CCAD reserves the right to limit the number of Suppliers visiting the premises.
 - 1.6. Suppliers visiting for the sole purpose of initiating and monitoring approved research studies, are exempt from this policy; on those occasions only, if there is a valid agreement in place.
 - 1.7. This Policy does not apply to activities of entities that lease CCAD property and Supplier visits that are required as per CCAD contractual agreements.
 - 1.8. Suppliers / Service Providers, in the course of providing business services to CCAD, who may come in contact with patients or have access to identifiable health information, must have a Non-Disclosure Agreement (NDA) in place, or the "Confidentiality" clause within the signed Agreement/Contract; and abide by the UAE Data Privacy Act.
2. Pre-Visit
 - 2.1. Upon the initial engagement, the Supplier will be informed of the organization's Policy.
 - 2.2. Supplier must schedule an appointment with the individual Caregiver, through Supply Chain, prior to being allowed to visit.
 - 2.3. Upon approval, Supply Chain will be responsible for notifying the Supplier of the check-in / registration process at the designated security reception.

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2.4. Pharmacy specific – all new pharmaceutical Suppliers must first register their visit with the Pharmaceutical Category Manager. During the registration, the Supplier must provide contact information of himself/herself as well as their Manager.

2.5. The Category Manager will provide the pertinent policies and guidelines.

3. Day of Visit

3.1. At check-in: the Supplier must register their visit by completing the check-in process at the designated security desk. The Supplier's visit will be verified and registered, with details of their name, company name, date and time of visit, and the individual or department being visited. They may present evidence of the visit / approval from the respective unit, if available.

3.2. If the Security Personnel is unable to verify the visit, they will notify the concerned department that the Supplier has arrived and obtain approval to allow the Supplier to register and proceed.

3.3. Suppliers will be issued a visitor badge. This badge must be visible at all times and must be returned upon completion of their visit. This is a temporary badge and allows them to only visit the Caregiver in the department or area of appointment.

3.4. Upon check-in, the Security Personnel will allow the Supplier to proceed to the department. Suppliers may not visit any other department or area, without a pre-arranged appointment or approved visit.

3.5. If the Supplier visit has to occur at times other than during regular business hours, the department must notify the check-in area and obtain in advance, a temporary badge for the Supplier.

4. Access

4.1. Under most circumstances, Suppliers are prohibited from entering patient care, clinical and OR areas within CCAD

4.1.1. An exception is allowed to this rule, in cases where a Supplier is required for training on a new equipment or devices already purchased by CCAD, setting up such equipment, or similar activities associated with a contractually agreed to business purpose, associated with new technology or devices. These cases, however, must be approved by Clinical Engineering and endorsed by the Department Head, subject to the contractual language and scope of services.

4.1.2. Suppliers may be granted access to procedural / OR areas for clinical support. Refer to the [Vendor Management Procedure](#) and "[Orientation for Vendors visiting Perioperative Areas](#)" for further guidelines and requirements.

4.2. Suppliers are only permitted access to the department or area of visit approved.

4.3. Suppliers may not leave pamphlets or patient education material without prior approval.

5. Food and Beverages

5.1. Suppliers are prohibited from providing these directly to Caregivers.

6. Displays

6.1. Suppliers are prohibited from displaying products or product information within CCAD.

6.2. Displays may be allowed during a formal CME course, sponsored in conjunction with medical management, approved research symposia or medical education activities if: i) the Medical Director approves; ii) procedures and displays are consistent with the policies endorsed by medical management concerning conflict of interest.

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7. Promotional Activities

- 7.1. Cash or other incentive programs are strictly prohibited.
- 7.2. Personal gifts of any kind from Suppliers to departments or Caregivers are prohibited. Refer to the “[Gifts and Sponsorship](#)” section of the [M42 Code of Ethics](#).
- 7.3. Suppliers are not permitted to distribute, post or leave any type of printed or handwritten material, advertisement, signs or other such promotional materials on the premises. Unsolicited material may not be provided to clinicians, and any promotional or informational material provided by the Supplier, must be explicitly requested and approved by the Medical Director.
- 7.4. Distribution of “patient educational material” from the Supplier, that may be useful to our patients, should be left at the appropriate department. The medical management office must review all educational information before it is distributed to patients or families. Suppliers are strictly prohibited from providing educational material of any type, directly to patients or from leaving them in areas accessible to patients.
- 7.5. Only pricing or cost information which has been approved by CCAD, may be discussed with the Pharmacist. Suppliers are prohibited from offering any special discounts or pricing to the clinicians, but must be routed through the Supply Chain Management department.
- 7.6. Raffles, lotteries, or contests, which provide the winner gifts of any value, is prohibited.
- 7.7. Promotion of drugs against restrictions, drug utilization guidelines, clinical guidelines or initiatives is prohibited. Non-formulary drugs or drugs, not the preferred list, may only be discussed if the pharmaceutical Supplier fully discloses this status to the Pharmacist. Pharmaceutical Suppliers who conduct business in an unethical manner will be escorted off the premises and the company suspended, pending a review of the event.
- 7.8. Samples
 - 7.8.1. Medication samples are controlled by the [Medication Samples Policy](#). Refer to the policy for guidelines.
- 7.9. Educational Programs
 - 7.9.1. Suppliers shall not sponsor any educational programs, without the approval of CCAD Ethics and Compliance division. Refer to the policy for guidelines.
- 7.10. Grants / Gifts
 - 7.10.1. Suppliers shall not offer personal gifts of any kind to any Caregivers. Refer to “[Gifts and Sponsorship](#)” section of the [M42 Code of Ethics](#).

Definitions

1. **Supplier**: Any representative of a manufacturer or distributor or a company who visits CCAD for the purpose of soliciting, marketing, or distributing information regarding the use of medications, products, equipment and services.
2. **Caregiver**: For the purpose of this policy, any reference made to Caregiver includes clinicians, all healthcare providers, interns, students, volunteers and persons hired at CCAD.
3. **Approved Drug Formulary**: The list of preferred drugs, as established by the Formulary Therapeutic Committee.

Institute / Department / Committee Involved in Policy Development / Revision

1. Supply Chain Management

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CCAD Related or Supporting Documents

1. [Vendor Management Procedure](#)
2. [Medication Samples Policy](#)
3. CCAD Vendor Visitation Guidelines
4. M42 Business Partner Code of Conduct
5. M42 Code of Ethics
6. Orientation for Vendors visiting Perioperative Areas

Abbreviations

1. CCAD - Cleveland Clinic Abu Dhabi
2. CME - Continuing Medical Education
3. OR - Operating Rooms
4. SCM – Supply Chain Management