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Industry Explains How To Avoid Risks When Using Social Media & Digital Channels

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Unauthorized promotion to the general public is one of the highest risks when using social media, says a new guidance from the drug industry associations IFPMA and EFPIA.

Engaging with online influencers requires subtle and careful evaluation, says new guidance from industry on how drug companies can manage the risks involved with social media and digital channels and avoid unauthorized promotion to the general public.

In addition, companies should be aware that they are responsible for all content disseminated via a digital channel including social media when the content is initiated, branded, and/or sponsored by the company or a third party acting on its behalf, according to the *guidance*, published jointly by the international and European trade groups, IFPMA and EFPIA respectively.

The guidance is designed to provide IFPMA/EFPIA members with non-binding advice when considering their activities on social media and digital channels. “Due to the global nature of these channels, any information shared through such social media and digital channels may potentially be accessed from anywhere in the world, which generates risk and uncertainty for our members,” it notes. Unauthorized promotion to the general public is one of the highest risks when using social media, it warns.

The guidance identifies the most commonly used social media and digital channels and describes what members should be aware of when communicating with the general public, health care professionals (HCPs), health care organizations, patient organizations and other stakeholders. It clarifies that in countries where direct-to-consumer promotion of prescription-only products is allowed, company policies on promotion to the general public “may follow the laws, regulations, and codes applicable in that country.”

The guidance applies to activities related to both pharmaceutical products and therapeutic areas,

such as disease awareness programs and scientific communications.

Engaging With Influencers

As for engaging with influencers, the guidance advises companies to assess the risks of undue influence towards HCPs or patients or vulnerable groups.

A company's rationale for engaging with specific online influencers and digital opinion leaders (HCPs and non-HCPs) "should be considered and documented to avoid the perception of improper promotion or perception of improper reward for past decisions, or as undue influence on future healthcare or other business-related decisions," it says.

Other Responsibilities

The guidance adds that companies should establish procedures to review and monitor their activities and content on social media and digital channels to ensure compliance with relevant codes and applicable laws.

"Processes should be established to monitor, moderate, and/or, where appropriate and possible, delete any inappropriate comments in a timely manner to the extent permitted by the data protection regulations and applicable laws and code."

Companies are not expected to generally monitor or police independent third-party activity on non-company social media and digital channels, the guidance clarifies. "This means where the member company has not initiated or sponsored the activity and/or the member company (or a third party acting on its behalf) does not own or control the digital channel on which the activity occurs. This is without prejudice to any duty of diligence and correction that exists under applicable laws, regulations, and local/regional codes."