Can you launch **pharma social media initiatives** – while remaining compliant?
Yes you can! Join us for a presentation outlining best practices, followed by a panel discussion focusing on: formulating appropriate thinking/frame-of-mind, as well as “If I had to do it over again” pearls.
Why are we here today?
Buying Habits Have Changed

Digital Initiatives have a greater impact now more than ever

Source: Harvard Business Review Dec 2010
So what’s holding us back from maximizing this medium?
Information Overload

- Rheumatoid Arthritis: 9,220,000
- Breast Cancer: 53,300,000
- Chronic Myeloid Leukemia: 1,730,000
- HIV: 52,300,000
CUTTING THROUGH THE DIGITAL NOISE

MICHELLE SULLIVAN COMMUNICATIONS
michellesullivan.ca
Facial recognition software analyses faces in the image and their 'corresponding facial mood score (FMS)'.

The brands can see how their products are being used, by whom, where and when.

The proprietary logo detection engine is trained to scan for up to 2,500 details in each photo.

The software can make associations between visible branding, in this case, linking Hunter wellies with Gelert tents and Yeo Valley dairy products.

Geolocation information helps target advertising.
"WE ARE LIVING IN THE MIDDLE OF A REMARKABLE INCREASE IN OUR ABILITY TO SHARE, TO COOPERATE WITH ONE ANOTHER, AND TO TAKE COLLECTIVE ACTION, ALL OUTSIDE THE FRAMEWORK OF TRADITIONAL INSTITUTIONS"

CLAY SHIRKY
Getting information off the Internet is like taking a drink from a fire hydrant.

Mitchell Kapor
It can get noisy out there.
tell me a Story...
Conventional communication

Remarkable communication

The Golden Circle: Simon Sinek
You're life can be amazing, but you have to tough this period of your life out.
we have an obligation to ensure that our schools are safe
ME DIRIEZ-VOUS BYE BYE SI J’ÉTAIS SÉROPOSITIVE ?
C’EST LE SIDA QU’IL FAUT EXCLURE, PAS LES SÉROPOSITIFS

SUIVRIEZ-VOUS MES PERFORMANCES

EST-CE QUE TOUT LE MONDE EN PARLERAIT SI J’ÉTAIS

SERIONS-NOUS TOUJOURS AMIS SI J’ÉTAIS SÉROPOSITIVE ?
C’EST LE SIDA QU’IL FAUT EXCLURE, PAS LES SÉROPOSITIFS

PRENDRIEZ-VOUS UN VERRE AVEC MOI SI J’ÉTAIS SÉROPOSITIVE ?
C’EST LE SIDA QU’IL FAUT EXCLURE, PAS LES SÉROPOSITIFS
# Carnival Cruise Tunes

No time for a Carnival cruise? No problem, we'll bring the Caribbean to you. Subscribe to Carni...

![Carnival Logo](image)

<table>
<thead>
<tr>
<th>TITRE</th>
<th>ARTISTE</th>
<th>ALBUM</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Summertime</td>
<td>Kenny Chesney</td>
<td>Greatest Hits II</td>
<td>03:26</td>
</tr>
<tr>
<td>Two Tickets To Paradise</td>
<td>Eddie Money</td>
<td>The Essential Eddie Money</td>
<td>03:57</td>
</tr>
<tr>
<td>One More</td>
<td>Jimmy Cliff</td>
<td>Rebirth</td>
<td>03:25</td>
</tr>
<tr>
<td>Hey Ya! - Radio Mix / Club Mix</td>
<td>OutKast</td>
<td>The Way You Move / H...</td>
<td>03:59</td>
</tr>
<tr>
<td>One More Time - Short Radio Edit</td>
<td>Daft Punk</td>
<td>Musique Vol 1</td>
<td>03:55</td>
</tr>
</tbody>
</table>

Crée par: carnival_cruiselines • 125 titres, 7 h 50 min

ABONNÉS: 558
Every 6 seconds, someone dies from smoking.

#WorldNoTobaccoDay
#smoking #fail #relatable #every6seconds
Deirdre Cozier
PendoPharm
Social Media Marketing

Highly Regulated Environments
Agenda

• Overview of product-related messages

• Social media considerations

• Critical factors for success
What is Acceptable?

• The acceptability of a message will depend on:
  – The type of regulated product
  – The audience to which it is disseminated
  – The content of the message

• As marketers, it is critical that you know the major restrictions
Type of Product
Regulated Healthcare Products

- Prescription drugs
- Non-prescription drugs
- Vaccines and radiopharmaceuticals
- Narcotics and targeted substances
- Natural health and homeopathic products
- Medical devices
- Cosmetics
- Foods
- Disinfectants
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Audience
Regulatory Definitions

• Healthcare Professional (HCP):
  – Licensed members of the professions of medicine, dentistry, naturopathy, nursing, pharmacy and other related disciplines and instructions

• Patient:
  – A person who has been prescribed or recommended a product and is being counseled on therapy by a HCP

• Consumer:
  – The general public
Product-Related Messages
Types of Messages

**Health Product Advertising**
Advertising is any representation by any means whatever for the purposes of promoting directly or indirectly the sale or disposal of any food, drug, cosmetic or device.

**Education and Learning**
Events whose primary purpose is to address the educational needs of physicians and other health care providers in order to improve the health care of patients.

**Scientific Communication**
Scientific information provided to a customer at their request to answer a specific question.

**Corporate Communication**
All communication aimed at informing employees and/or shareholders of company activities.
Key Advertising Principles
<table>
<thead>
<tr>
<th>Type of Product</th>
<th>HCP</th>
<th>Patients</th>
<th>Consumers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rx Drug</td>
<td>PAAB Code</td>
<td>Information/education</td>
<td>Limited to name/price/quantity</td>
</tr>
<tr>
<td>Non-Rx Drug (OTCs, NHPs, BTCs)</td>
<td>PAAB Code</td>
<td>Information/education</td>
<td>No claims for a Sched A disease</td>
</tr>
<tr>
<td>Narcotics</td>
<td>PAAB Code</td>
<td>Information/education</td>
<td>No DTC allowed</td>
</tr>
<tr>
<td>Vaccines</td>
<td>PAAB Code</td>
<td>Information/education</td>
<td>Preventative claims are allowed</td>
</tr>
<tr>
<td>Medical Device</td>
<td>No misleading claims</td>
<td>No misleading claims</td>
<td>No misleading claims</td>
</tr>
<tr>
<td>Cosmetics</td>
<td>No misleading and/or drug claims</td>
<td>No misleading and/or drug claims</td>
<td>No misleading and/or drug claims</td>
</tr>
</tbody>
</table>
Basic Tenants

• Every sponsor is responsible and accountable for their online messages
• The same rules apply to online activities as they do for other media
  – If you can’t do it on paper, you can’t do it online!
• But, it is possible to have a successful social media presence
  – It will require planning upfront
Social Media Complexities

• SM includes websites and applications that enable users to create and share content or to participate in social networking
  – Also known as user-generated content (UCG)

• The problem:
  – We cannot control what users say
  – And we can be held accountable for their comments and use of sponsor-controlled sites
Example – Product-Related FB Site

• FB is public...DTC rules will apply
  – A rx drug: Name/price/quantity
  – Cannot make any claims for Schedule A disease regardless of the product
    • Preventative claims are allowed (e.g., vaccines)
  – No misleading advertising

• User posts may make links to:
  – Off-label use
  – Safety issues
  – Compliance and legal issues
Key Sponsor Responsibilities

• Adverse events reporting
  – Every employee is responsible to transmit AEs to their drug safety department

• Compliance issues
  – All discussions in regards to the product must be:
    • Within the TMA
    • Have risk information disclosed

• Appropriate content as per Terms of Use
  – Non-offensive
  – Legal restraints
Proposed Process

• Triage comments against pre-established criteria
  – Have a trained community manager
• If a post or comment meets the criteria:
  – Review by a Rapid Response Team (RRT)
  – Have prepared responses at the ready
• RRT should be small and consist of:
  – Regulatory
  – Legal
  – Medical
Triage Flowchart

User comment → CM* Screen

- Safety related?
  - Violates ToU?
    - Compliance issue?
      - CM responds appropriately
    - RRT assessment
      - Respond with pre-approved text

Recommended to establish short turnaround times for response

*CM: Community Manager
Critical Factors for Success
Key Takeaways

• Plan ahead!!!
  – Establish the process before you engage including standard responses and a RRT process
  – Have an exit strategy

• Know your company’s tolerance for risk
  – Some sponsors may be more willing to accept risk than others

• Have trained community managers
  – Advanced AE/compliance training
Questions?