

Use of Social Media by Life Science Companies

By Mai Tran and Sue Egan

This article explores the extent to which Social Media is being used around the world, both inside and outside the Life Science industry, including some innovative uses by companies in our industry. It looks at the current regulations and codes of practice and whether or not these have kept pace with Social Media innovations. Finally, the risks of both using and not using Social Media are reviewed to give a comprehensive picture of the landscape in this emerging and exciting area.

Introduction – Social Media usage around the world

The access to, and use of, the internet has changed our lives within a very short period of time. The global internet audience stands at 2.4 billion, 6 times what it was 12 years ago¹. The rise of Social Media is even more impressive. Defined as interactions among people in which they create, share, and exchange information and ideas in virtual communities and networks², Social Media is used by 1.5 billion people³, including 900 million active users on Facebook with 3.5 billion pieces of content shared weekly on this leading platform. At the same time, 175 million Twitter accounts generate more than 95 million tweets a day.

North America and Europe stand high in the access and use of the internet, and therefore Social Media as well. The US is first in terms of penetration with 78.6% i.e. 274 million Americans using the internet. But Asia is also at the forefront of adoption, with 1.08 billion internet users; nearly one out of two internet users is Asian and 70% of them are members of at least one social medium.

One way in which Life Science companies are using Social Media is to interact with and learn more about their patients. As patients are moving online to discuss healthcare issues, it is a logical step that healthcare providers and Life Science companies are following them online to take part in those conversations. Generally, there are three different strategies companies are using regarding Social Media: listen, participate, and lead.

The lowest risk method of Social Media engagement is to listen to patients while they have conversations over public Social Media networks. The next level of engagement is to participate in Social Media conversations, enabling companies to drive the discussion. The highest level of engagement is to lead conversations by creating and managing communities.

In the western world where regulations allow, there are several examples of Life Science companies using all three of the strategies listed above. Most of the discussions are taking place on dedicated healthcare social networks such as “Patients Like Me” and “Sermo” (for physicians). Where the community allows, Life Science companies are taking part in the conversation on these sites. Additionally, some Life Science companies have created communities of their own such as Alli Circles⁴.

Considering that Social Media is inescapable, how do healthcare institutions deal with this phenomenon? And, more specifically, how can Life Science companies participate in and influence the healthcare information presented on Social Media platforms?

¹ InternetWorldStats.com

² Ahlqvist, Toni; Bäck, A., Halonen, M., Heinonen, S (2008). "Social media roadmaps exploring the futures triggered by social media". VTT Tiedotteita - ValtionTeknillinenTutkimuskeskus (2454): 13.

³ Insitesconsulting

⁴ See <http://www.doseofdigital.com/healthcare-pharma-social-media-wiki/> for a list of US sites.

Rules for use of Social Media by Life Science Companies

As with many technical innovations, the rules around the use of Social Media have not kept pace with the desire to use such media. For example, the PhRMA⁵ code contains three mentions of “web”, all of which refer to its own website, no uses of either “social” or “media”, and no uses of “internet” or “electronic”. The FDA had been expected to issue guidance on the use of Social Media, but instead issued draft guidance on responding to off-label information requests⁶, which is still useful as it includes references to electronic communications and Social Media, so it should not be ignored.

In June 2011, the UK’s PMCPA⁷ issued informal guidance⁸ on the use of digital communications, which encompasses Social Media. This informal guidance, which was updated in October 2012, largely takes the approach of explaining how the Code of Practice panel would interpret the code with respect to Social Media if a complaint was referred to them. It is very helpful in linking particular parts of the UK’s ABPI Code to the use of Social Media and other digital mechanisms.

Despite the lack of guidance, all the regulators are likely to agree on a general principle (whether they have publicly stated it or not) that whatever is not allowed outside of Social Media will also not be allowed within Social Media, and vice versa. So what companies really need to think about is whether or not what they plan to do with Social Media would be allowed using any other mechanism. If the answer is “no”, they should not do it. If the answer is “yes”, they should ask themselves if there are any particular issues associated with the use of Social Media that are not present with other mechanisms, such as ensuring that they reach the right audience. If the answer is “yes”, they need to consider what safeguards they need to introduce to ensure that these particular issues can be overcome. If no such safeguards are available, they should seriously question the wisdom of continuing with the proposed use of Social Media.

When determining whether or not to engage fully with the Social Media revolution, looking at the rules is only one part of the equation. Companies also need to look at their own company values and appetite for risk to determine to what extent they engage with Social Media. Those companies that take a more conservative approach to risk might want to let others blaze the trail for them and only enter the revolution when they are sure that they fully understand the risks. The risk with this approach is that these companies are left behind and hand the advantage to the competition. Other companies will want to be constantly pushing the boundaries to discover where the solid lines are and remove any doubts. The inevitable risk with this approach is that regulators may impose sanctions that could have been avoided with a more cautious approach.

Whatever their approach to Social Media every company should write a Social Media policy that is regularly updated to take account of recent changes. For some companies, this may be a simple statement that they do not use Social Media for any purposes. For others it may be a list of which Social Media mechanisms they use for which purposes and how to ensure that their use of Social Media stays within the rules. Whether the company uses Social Media or not, it is important that all staff understand the company’s position and what it means for them, both as employees and as

⁵ Pharmaceutical Research Manufacturers of America (PhRMA) is the self-regulatory body of the pharmaceutical industry in the USA

⁶<http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM285145.pdf>

⁷ Prescription Medicines Code of Practice Authority is the self-regulatory arm of the pharmaceutical industry in the UK, regulating the ABPI (Association of British Pharmaceutical Industries) code.

⁸<http://www.pmcpa.org.uk/advice/digital%20communications/Pages/default.aspx>

private individuals. Companies that choose to engage with Social Media also need to define which departments own which channels where possible.

Examples of how Social Media have been used by Life Science Companies

Social Media is nothing more than a communication channel and as such Life Science Companies already use communication in different areas for different objectives. In many cases, Social Media platforms are generated and managed by HR and / or Marketing / Communications departments. Communication/PR department is generally the leader in terms of strategy and implementation of the Social Media activities of the company and works closely with marketing when it comes to disease or product communication.

The HR department could lead a Talent Recruitment campaign through a corporate Facebook page. It could also create an internal information or mobilisation campaign for its employees by creating an intranet and tools with which employees could interact such as a forum or a blog.

Facebook pages of Life Science companies such as GE Healthcare, Pfizer or Novartis are not only posting corporate news but also allow patients to share their journey and tips to better manage health. CEOs and managers, but also industry associations could have blogs or Twitter accounts. The Pharmaceutical Research and Manufacturers of America (PhRMA) has its Twitter account and tweets on a daily basis for example.

When it comes to marketing and brand management, the use of Social Media is always more delicate to handle as the communication should not be seen as promotional or direct to consumer advertising.

Life Science companies often use Social Media for disease awareness campaigns such as a recent campaign implemented in the US for a pharmaceutical company. The Social Media campaign was aimed at raising awareness of tuberous sclerosis complex (TSC), a rare genetic disease affecting children and adults, and building relationships with the TSC patient and advocacy communities. A children's illustrated TSC eBook was created that solicited art from patients to facilitate dialogue among TSC families and generate online buzz. The launch of the initiative took place during TSC awareness month to capitalize on mindshare and reached out to TSC centres of excellence to circulate messages to core constituencies.

Social Media can also be used to engage third parties in order to share scientific information on a drug still in development. A case in point was a campaign aimed to leverage forums and discussion boards to engage healthcare professionals in China. While a highly academic new study was released in the US, the main results and key take-aways were commented and posted in "diary posts" in which doctors could also share their own experiences about treating specific disease. The discussions were posted on a very popular HCP portal (DXY.com) (as well as 7 other online medical forums to host the posts/discussion threads).

The Council for Responsible Nutrition Foundation needed to find a more efficient way to connect with health and wellness conscious women, and find a way to start the conversation online about the value of supplements in an overall wellness plan. RFI Studios developed the organization's first-ever mobile application, the WannaBeWell App, a comprehensive wellness resource that educates, activates and motivates. Visibility of the app was raised through a holistic promotional mix that included blogger networks, in-app mobile and Facebook ads within the marketplace.

Risks involved in using Social Media

There are five main risks associated with the use (or not) of Social Media for Life Science companies:

1. Failure to comply with the requirements for Adverse Drug Reaction (ADR)⁹ reporting
2. Direct to Consumer advertising where this is not allowed
3. Off-label promotion
4. Not recognising the overlap between people's professional and private lives
5. Not engaging with Social Media at all, thus giving the advantage to those companies that *do* engage

ADR reporting and trending is a serious responsibility within the overall definition of Pharmacovigilance. Companies should ensure that any use of the internet, websites, or Social Media either prevents the possibility of ADRs from being recorded, or that monitoring is in place to ensure that any ADRs that are reported are dealt with in an appropriate manner.

In most countries around the world, it is not allowed to advertise drugs direct to members of the public, regardless of the medium used for such advertising. The notable exception is the USA, but even there, rules are in place to ensure that the advertising is of an appropriate nature and does not give people false hope. Companies need to ensure that where they are using websites, Social Media and other electronic means to give factual information regarding products to healthcare professionals (i.e. not advertising) that they either ensure that only healthcare professionals are able to view the materials, or (as in most of Europe), the materials are flagged as being intended for the use of healthcare professionals only. In some countries, for example the UK, it is also a requirement that where the general public can access such factual information intended for healthcare professionals, similar information should also be provided that is intended for patients, and the two sets of materials should be appropriately flagged. Where the number of characters is restricted, as with Twitter, companies are highly unlikely to be able to comply with all the rules around the use of product and generic names, ensuring balance, and highlighting risks as well as the potential benefits.

Off-label promotion is an area that has seen a number of large fines being imposed on pharmaceutical companies in recent years. The potential for off-label promotion in the use of Social Media where healthcare professionals use the forum for discussion is similar to conventional discussions at meetings and conferences. The draft guidance issued by the FDA on this topic (see above) is helpful. Companies should be aware that they will need to either moderate the discussion so that it stays within the indications on the label, or that off-label portions of the discussion are entirely non-promotional. They will also need to ensure that their participation in the discussion could not be construed as encouraging healthcare professionals to request off-label information, as this might be viewed as a solicited request. This is obviously an important point where an online discussion group has been set up to review the results of a clinical trial. Clearly, companies need to be able to encourage scientific exchange in order to gain approval for new products, or for new indications for existing products. However, the line between scientific exchange and promotion can sometimes become blurred. This would be a danger signal.

The risk of not recognising the overlap between professional and private activities may not be obvious, so we perhaps ought to look at an example to work through the potential issues. An individual who works in the marketing department of a Life Science company and has a Facebook page for personal use and a LinkedIn entry for professional use may think that he has successfully segregated his personal and professional lives. If he then joins a Facebook group that was set up to discuss a product class where the company that he works for has a product, he may again this that

⁹ According to the UK's Medicines and Healthcare products Regulatory Agency (MHRA) website, www.mhra.gov.uk, an adverse drug reaction is "any undesirable experience that has happened to the patient while taking a drug that is suspected to be caused by the drug or drugs".

this is in a purely private capacity. However, because search engines enable us to connect all our internet-based interactions very easily, these lines have become blurred. Any other member of the group can use a search engine to find his LinkedIn entry, so any comments that he makes on the Facebook group can be easily traced via his LinkedIn page to the company that he works for. In this way, his private comments online can never be private, and so the lines have become blurred.

The final major risk around the use of Social Media is to choose not to participate at all. This gives a huge advantage to the competition. As we saw above with the statistics around the global use of internet-based communications and use of Social Media, this is a growing area that companies ignore at their peril. The key to using Social Media well in our industry is to remember that whatever is allowed normally is also likely to be allowed via Social Media, whilst not forgetting that the converse is also true! Those companies that are able to steer a path through the difficulties in implementing Social Media will have a great advantage.

Conclusion

In conclusion, the use of Social Media is a great opportunity for companies to get the right messages to the right audience using mechanisms that the audiences choose, meaning that companies can get closer to their customers. Life Science companies have been slow adopters of Social Media compare to other sectors but they start to be more engaged and present in these platforms. The first step when building a Social Media strategy is to establish a solid monitoring system to be able to understand the players; NGOs, patient groups, individuals etc., before building a presence via specific tools and stories adapted to the Social Media environment. However, Life Science companies need to ensure that they stay within the rules, to avoid paying the price for not doing so (both in terms of fines and reputational damage). Each company will need to look at its values and approach to risk, and then define its Social Media policy accordingly.

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In January 2010, Sue established the management consultancy, Sue Egan Associates Limited, specialising in Corporate Governance, Compliance, Risk Management and Change Management. Sue works with clients in various sectors (life sciences companies, charities, a government agency, and other industries) to help them find innovative ways to conduct business ethically and sustainably.