

*The Asia Pacific*

# Pharmaceutical Compliance Congress

*and Best Practices Forum*

A Hybrid Conference and Internet Event

## *Social Media Compliance Issues*

September 11, 2012

Intercontinental Shanghai Pudong

Hotel in Shanghai, China

# Welcome and Introductions

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# The Increasing Importance of Social Media

# Social media key risks

- Adverse Event reporting
- Direct to Consumer advertising
- Off-label promotion
- Personal / professional overlap – staff and others
- Not engaging with social media

# Social media key risks

- Adverse Event reporting
  - Not a huge issue (<0.3% of 257,177 posts reviewed\*), and can be managed
- Direct to Consumer advertising
  - Need clear social media policy – how to avoid where not allowed
- Off-label promotion
  - Need clear social media policy – how to avoid
- Personal / professional overlap – staff and others
  - Need clear social media policy to understand overlaps
  - UK's PMCPA guidance states all activities by any employee needs to comply with the code, regardless of forum / role
- Not engaging with social media
  - Give advantage to competitors and others to keep control of key messages

# Social media is playing a central role in creating an engaged and empowered customer

- The global Internet audience stands at **2.1 billion**, ...and they are heavily engaged in social media

- 900 million active users on Facebook
- 175 million Twitter accounts, and over 95 millions tweets per day
- 3.5 billion pieces of content shared weekly on Facebook
- 100 million+ members on LinkedIn
- 156 million public blogs
- 2 billion+ video views on YouTube every day

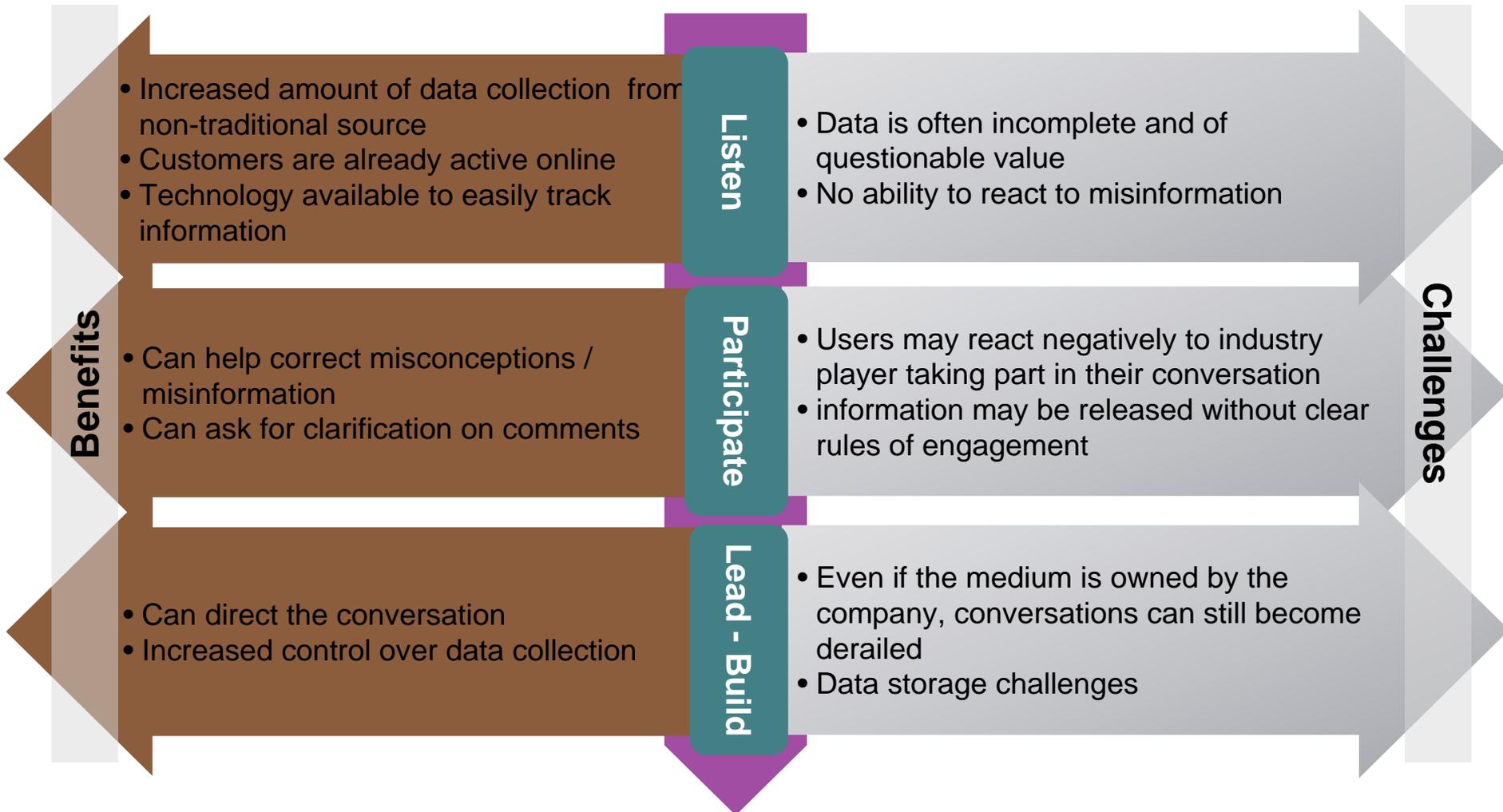
Sources: InternetWorldStats.com; Facebook.com; linkedin.com



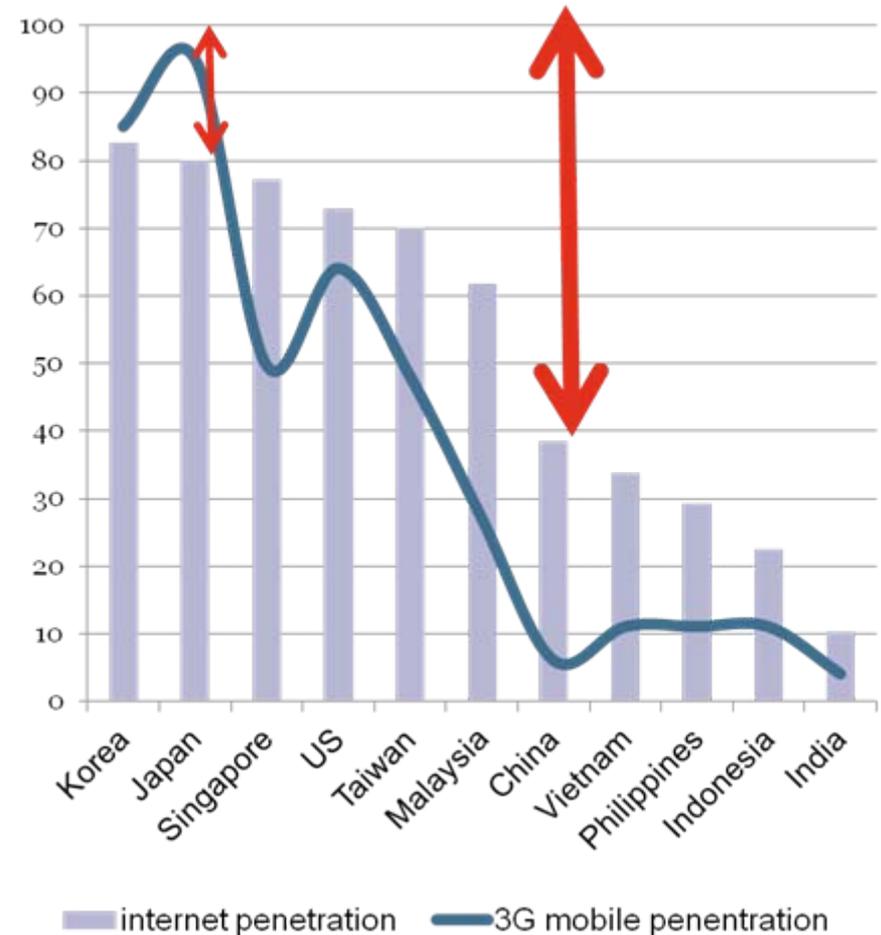
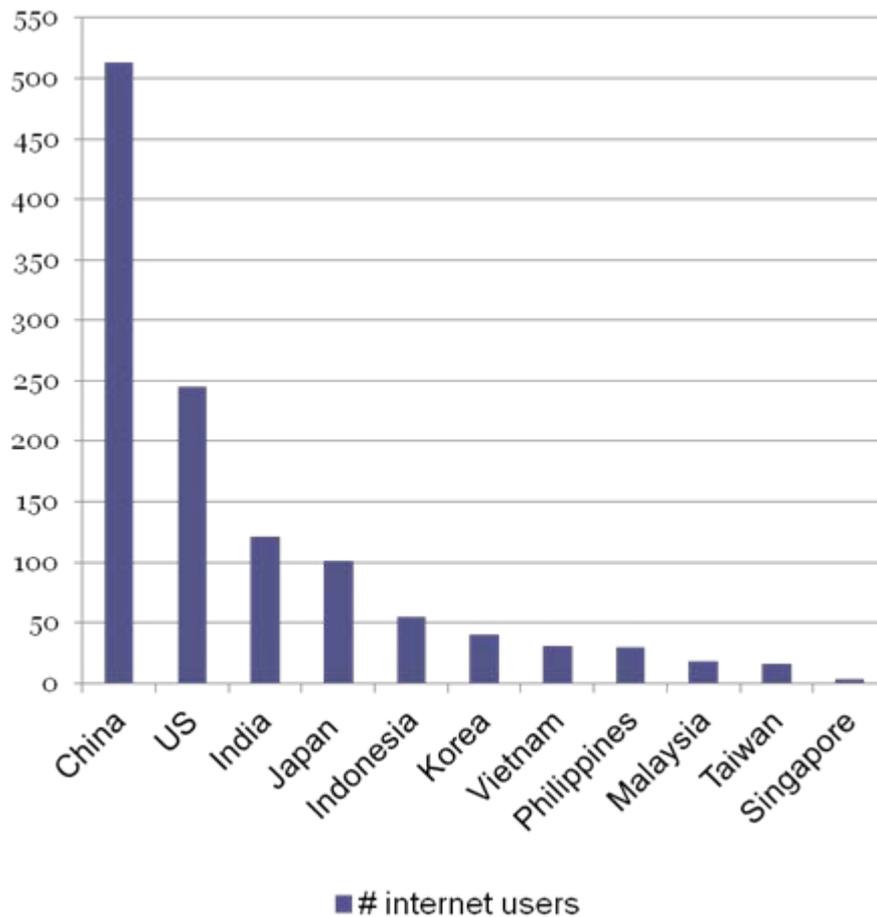
... and **Asia** is at the forefront of adoption...

- 1.016 billion (45% ) of the world's internet users are in Asia
- Internet penetration in Asia is 26%
- 18 million LinkedIn users are from the AsiaPac region

# Three fundamental social media roles all with benefits and challenges



# Internet usage and social media engagement across Asia

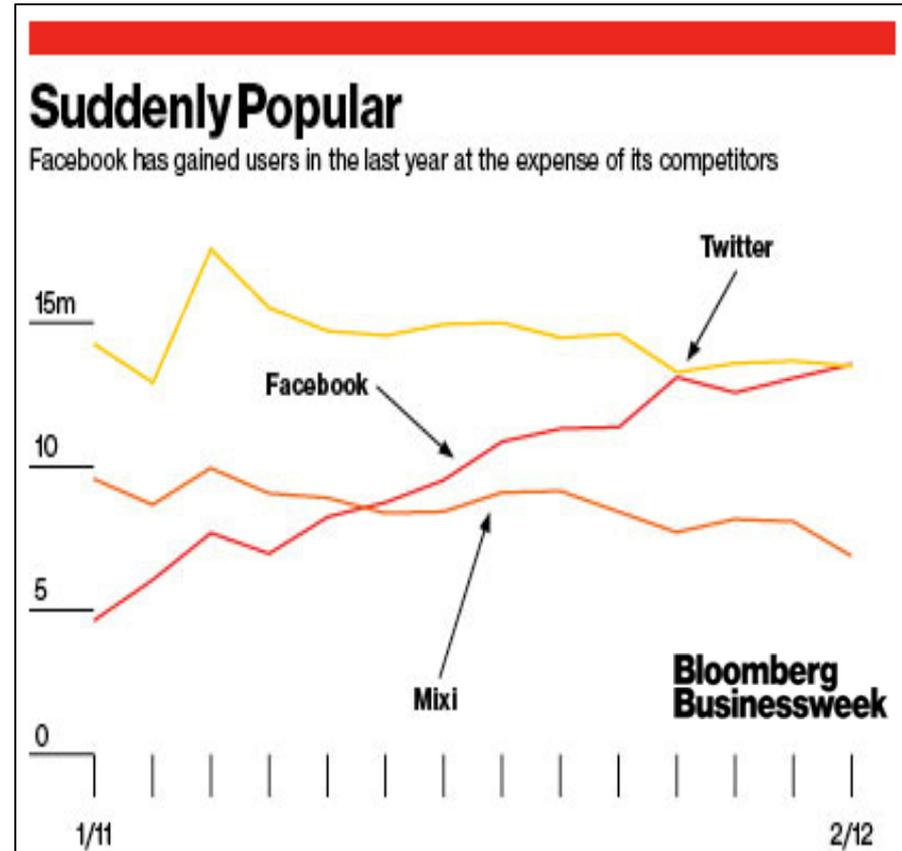


# Top Social Networks in Asia



# Social Media Landscape in Japan

- Facebook adoption in Japan was slow, as historically The Japanese haven't been comfortable sharing personal information, or even their names, on the Internet.
- After the March 2011 Earthquake/Tsunami, that started to change, as the platform helped families locate and communicate with each other, leading to a spur in popularity.
- Japanese is the second most popular language used on **Twitter**, and the local network **Mixi**, while slowing down some remains a dominant platform
- By 2014, **Facebook** will hold the lion's share of social media attention in Japan



# Social Media Landscape in China

- **538** million Internet users in China as of now, compared with **513** million half years ago.

- **388** million mobile phone users using their phones to access Internet

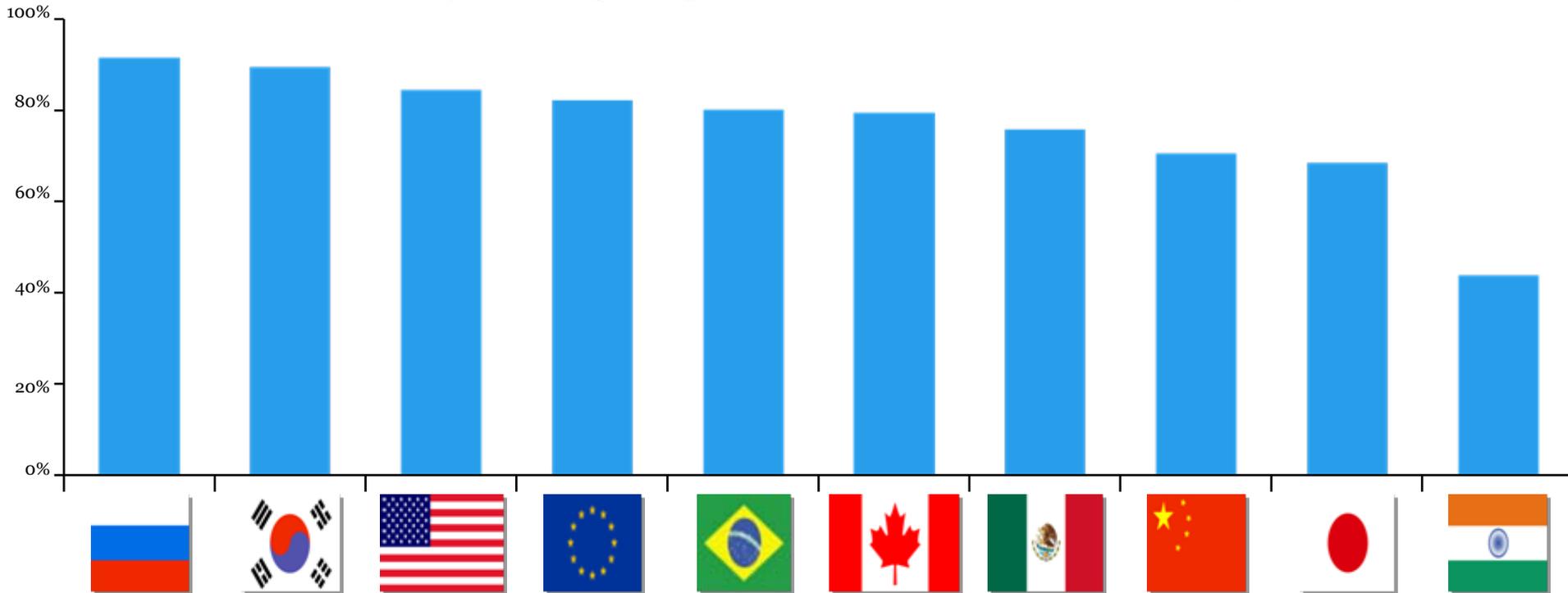
- **380** million PC terminal users, which means mobile internet users first exceed PC internet users in China

- **274** million Weibo users in China, **170** million access weibo through mobile terminal



# More physicians are online to learn, discuss and debate

Physicians agreeing “Internet is essential to professional practice”



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# Social Media Engagement Ideas

## Selected Case Studies

# Case study 1: Leverage forums and discussion boards to engage targeted audiences

## Scenario background

- Highly academic new study of drug xx released in the US, long and boring and in English

## Challenge: How to ensure reception of information and messages to healthcare professionals in China? Make the information appear interesting and pertinent?

## Solution

- Key messages are delivered contained inside “diary posts” recounting doctors’ own experiences about treating specific disease
- Partner with DXY.com (highly popular HCP portal) as well as 7 other online medical forums to host the posts/discussion threads
- Project owner is not pharma company but professional association and debate is directed to focus not on a particular drug, but treatment class

## Results

- Posts/discussion threads generated 9,029 visits and 157 replies on DXY.com alone

## Facts to Know\*

**98% of Chinese physicians** access the Internet, spending an average of 11hrs/week, including **5.1hrs** on profession-related activities.

**>90% of Japanese physicians** use internet to gather medical information

标题: 11位  
医生: 陈旭  
个人经历: 陈旭医生  
病情描述: 陈旭医生

1.VEGF有多多个点, 阿瓦斯汀到底针对的是哪个点呢? 那么多点, 用哪一个是最能影响血管的生成。  
2.VEGF并不是血管生成的充分条件, 也不是血管生成的必要条件, 除VEGF之外, 血管内皮细胞增殖的信号还有很多, 用抗体阻断VEGF只能阻断血管生成或延缓  
3.抗体和抗原的结合不是不可逆的, 而是可逆的, 单抗结合VEGF, 两者会自然分离, VEGF会重新和VEGF结合, 那么这种暂时的结合是否会导致抗体脱离后VEGF结合之点的更多呢?  
4.VEGF是内皮细胞增殖和迁移的因素, 而不是血管维持的充分必要条件, 用VEGF抗体结合, 最多可以阻止新的血管生成, 但不会把已经形成的血管  
5.细胞性, 血管生成不是肿瘤特有的, 组织修复, 炎症中同样存在大量的新生血管, 阻止新生血管必然会影响到组织修复过程, 影响内皮细胞再生有赖于内皮的细胞  
6.因为VEGF有增强内皮细胞的作用, 用抗体与VEGF结合, 暂时阻断VEGF的作用, 确实可以降低血管通透性, 降低组织水肿, 但是不可取了化疗药物向肿瘤组织内渗透, 因  
7.化疗药物是溶于水中的, 水中分子状态存在于水分子之间的, 当血管通透性降低的时候, 渗透到内皮细胞的不在只有水分子, 而且还有化疗药物, 正如我们用一个更加紧密  
8.细胞性屏障的时候, 不可能先出去水分子, 而是先出去药物的。  
9.肿瘤内血管消失的同时, 也同时降低了化疗药物的渗透性, 因为化疗药物输入组织内的量就没有了。

陈旭医生 writer:  
1. 肿瘤上药指南, 事实上, 阿瓦斯汀大部分是一下A+单抗, A+单抗是anti-angiogenesis联合化疗药物的治疗策略, 阿瓦斯汀联合其它化疗药物达到一个比较  
好的抗肿瘤效果 (陈旭医生写A+单抗一个完整的命名)。  
传统的肿瘤治疗方式是化疗和放疗, 会有毒副作用和健康隐患, 阿瓦斯汀联合化疗药物, 阿瓦斯汀联合化疗药物, 这种治疗方式的原理是,  
之后出现的精准靶向治疗, 靶向药物等找到靶细胞, 但治疗范围过于精确, 只能覆盖到20%的癌细胞范围。  
而A+单抗理念, 并不是控制肿瘤, 而是把肿瘤细胞以生存的上游, 以营养和代谢物质的供应切断, 用一个比喻来说, 我们切断了肿瘤的供血系统, 那么此  
时, 我们化疗, 这一手段, 就比较容易把肿瘤细胞杀死。  
2. 国家食品药品监督管理局已批准阿瓦斯汀用于抗肿瘤性血管生成, 这是我国首次引入国外先进的抗肿瘤血管生成药物。

\*Source: Digital Life Physician, Kantar Health and DXY , 2011 Survey on Internet Usage Trends Nikkei Business Publications, 2012;

# Case study 2: Utilize Weibo echo chamber to broadcast message to wider base

- 250 million registered users on Weibo (nearly 50% of internet user population in China).
- **Scenario background**
  - Pharma company wants to leverage Breast Cancer Awareness Month to create more buzz on new program helping breast cancer patients
- **Challenge:** How to outreach the maximum number of patients possible given limited scope and scale?
- **Solution**
  - Establish strong relationship with KOL with a large Weibo base, and engage the KOL to use that base to help spread the message and add third-party credibility

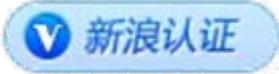


Eg: Jiang Zefei, Breast Specialist Department Director, 307 Hospital

“Caring for BC patients”  
15:30-17:00, October 17

Total Questions: 199  
Total Answers: 69

# Case study 3: Create own Weibo account and reach consumers directly



Once proper documentation has been submitted, this symbol appears on Weibo homepage along with company name, signaling that the account has been verified as the official handler.

1474 | 52513 | 1394

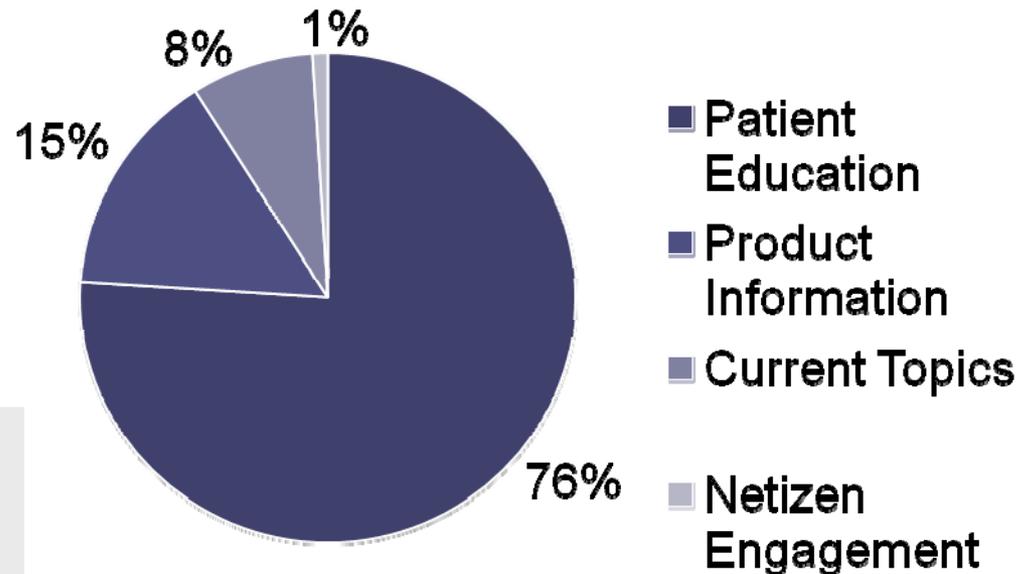
Following | Followers | Tweets

**Post freq.:** 2/day (Mon-Fri); 1/day (Sat./Sun.)

**Tone:** Factual and Informative

**Influence:** medium forward frequency

## Post Topics (May-Aug 2012)



### Educational Tags

#Sugar innate whiteness  
#Sugar control strategy  
#Secret sugar tips  
#Pancreatic stories

### Current Topics

- 2012 Olympics
- Rainstorm Protection
- Dragon Boat Festival

### Interactive Tag

# xx Olympics Quiz

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# Social Media Compliance Considerations

# Some Guidelines to Consider

## **British Prescription Medicines Code of Practice Authority, April 2011**

- Warns against any communication with the public that would be considered ‘promotional’.
- Differentiate between proactive and reactive
  - Companies are allowed to respond via social media to consumer questions (reactive) and to provide basic information for general consumption (reference).



## **US Food and Drug Administration, December 2011**

- If you wouldn't say something offline, don't say it online => draw as much parallels as possible with existing communication processes.
- Clearly distinguishes between “solicited” and “unsolicited” off label questions
  - Responses should only be made to unsolicited requests which pertains to a company's named product
  - Response should be directed only to the individual making the request (eg: by email)
  - A public response should not include any links to brand.com sites
- Companies who respond to posts on independent third party sites should continue to regularly monitor those sites for future legitimate interventions

# Some Guidelines to Consider

Overall, both guidelines draw essentially the same conclusion:

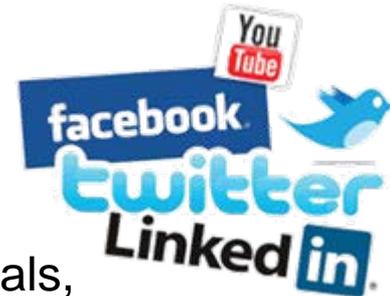
A company should use its own best judgment. If they can make a strong case (internally and honestly) that a social media engagement truly advances the public health and do not merely promote its own product(s), then it would probably fall within regulatory compliance.

# Understanding your customers in social media

- 1 Social media behavior:**  
How advanced are consumers in terms of their social media behaviors across the various outlets?
- 2 Health information discovery online:**  
Which pathways and outlets do consumers use to actively seek out online health information, as well as how do they casually come across this content?
- 3 Online health media mix:**  
Which types of online health resources and media do consumers use and to what extent do they rely on global websites?
- 4 Pharma online touch points:**  
Which types of online information and services do consumers want from pharma companies and where do they want to access these resources?  
Which types of health video do consumers want to see from them and how are they using social media for OTC info?

# Ethical behavior considerations for your organization

- **Despite a regulatory environment that is still grey in many countries, the following steps can be taken to ensure ethical behavior in the social realm**
  - Have a public **Social Media Policy and Code of Conduct** that applies to all social media activities on sites owned or sponsored by the company
  - It has always been critical to **monitor** the news, which is now even more imperative a viral story can rocket to the forefront nearly instantly. Have an **Action Plan** for a timely and proportional response, whether that be a correction of unauthorized modification to approved content or involvement from Public Relations.
  - Promote **transparency of influence** on all communications
    - By employees , consultants, and third parties,
    - Sponsored discussions, including advocacy groups,
    - Sponsored content, including compensated patient testimonials,
    - Display ads on specific discussion pages



# Social Media: mitigate risk and maximize value

Establishing  
a Cross  
Functional  
Social Media  
Team

Defining the  
Social Media  
Universe for  
the Business

Defining  
Social Media  
Participation

Establishing  
Social Media  
Guidance

**A combination of strategic and tactical initiatives  
to make social media viable**

Integrating  
Social Media  
Processes  
Into the  
Business

Establishing  
a  
Social Media  
Data and  
Reporting  
Model

Monitoring  
Social Media  
Initiatives

Analyzing  
Social  
Media  
Insights for  
Action

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# Social Media and Compliance

## Selected Case Studies

# Compliance case #1

- Your company has recently set up a facebook page and Twitter account, which are managed by staff in your communications department.
- What do they need to know to ensure that their social media interactions keep to what is allowed?

# Compliance case #2

- A member of your company's communications department is responsible for monitoring social media for discussions about your company and its products.
- One day, he finds a thread discussing your major product in a way that he believes is both detrimental to your marketing efforts, and is also based on a use that is not approved in your country.
- It looks as though no staff from your company are involved in the discussion.
- Is there a problem? If there is, what can and should you do about it?

# Compliance case #3

- One of your products is for a therapeutic area that is not generally well understood. A new Wikipedia entry is being written on this therapeutic area. Many contributions to the new Wikipedia entry have been made and you are looking through them to ensure accuracy.
- You find an entry made by a Doctor Keung Wong who claims to work for your company. You know that there is a Keung Wong who works in your marketing team, but he is not a healthcare professional. When you ask if he has posted the comments, he admits that he has. He also admits to using the title of “Doctor” to give his comments more weight within the online discussion.
- What are the issues?

# Compliance case #4

- You are the local compliance officer for your company and you discover that a member of the marketing team has posted comments about one of your main products on an online forum. The comments state that good results have been obtained by healthcare professionals using the product for a use that is not approved in your country. Your colleague has not declared online that they work for your company.
- What are the issues? What should you do?
- Would your answers be different if the comments had been posted by a healthcare professional relating their personal experience of using your company's products for the benefit of patients?

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Questions?

Thank you for your attention!

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