

OTC & COMPLEMENTARY MEDICINES INDUSTRY

SOCIAL MEDIA GUIDELINES

November 2013



AUSTRALIAN
SELF MEDICATION
INDUSTRY



ABOUT ASMI



ASMI (Australian Self Medication Industry) is the peak body representing companies involved in the manufacture and distribution of consumer healthcare products in Australia. Since its establishment in 1974, the Association has focused its efforts on supporting the progress and development of the Self Care products industry. Self care products incorporate non-prescription products such as “over the counter” (OTC) and complementary medicines (CM’s).

ASMI has led the way in providing these guidelines for the OTC and Complementary Medicines Industry to assist healthcare organisations and brands engage in social media in a responsible and ethical manner.

ABOUT WEBER SHANDWICK



Weber Shandwick is one of Australia’s leading public relations agencies, providing communications counsel and support to some of the most recognised brands in the country, including those within the healthcare industry and digital space.

Weber Shandwick has been an instrumental partner in assisting ASMI in developing these guidelines for the OTC and Complementary Healthcare Industry.

www.webershandwick.com.au

ACKNOWLEDGEMENTS

ASMI would also like to thank all those involved in contributing to the creation of these guidelines. This includes the ASMI Marketing & Ethics Subcommittee, as well as those ASMI members and stakeholders who provided feedback during the consultation phase.

1. Social media guidelines

1.1 Objective

The objective of this document is to inform and educate on the responsibilities of ethical healthcare organisations, as they relate to operating in social media. These guidelines are intended as a broad guide only and do not replace or alter an organisation's obligations under any relevant code of conduct, regulation or legislation.

In particular, organisations are reminded of their obligations under the Therapeutic Goods Advertising Code, the Therapeutic Goods Act and the Australian Consumer Law. In addition, ASMI members are reminded of their obligations under the ASMI Code of Practice.

The purpose of this document is to assist organisations to meet their existing obligations.

1.2 Vision

These guidelines are a first step to creating a new standard of social media engagement for healthcare organisations. They are intended to help support existing codes of conduct and internal procedures that an organisation may already have in place.

2. What is social media?

2.1 Definition of social media

Social media is characterised as a subset of digital media. It is also defined as any online channel that can provide a 2-way interaction between two parties.

Facebook, Twitter, YouTube and LinkedIn are clear examples, but this also extends to user review sites, blogs, forums and message boards.

Social media is further characterised as an eco-system of owned, earned and paid media. These forms of social media are defined by:

- Owned media: any online profile, channel or forum where the organisation can exhibit some level of control over its content. These include but are not limited to:
 - Electronic Newsletter (eDM)
 - Facebook Page
 - Twitter Profile
 - LinkedIn Profile
 - Instagram Profile
 - YouTube Channel
 - Blog
- Earned media: any third party comment or post with no direct control or influence by the organisation. These include but are not limited to:
 - Third party blog posts
 - Articles on mainstream news websites
 - Twitter public replies (often called @replies)
 - Third party Instagram photos
 - Individual comments by advocates and detractors on pages
- Paid media: any piece of media (comments, photos, ads) that has been sponsored and or paid for by the organisation. These include but are not limited to:
 - Facebook Ads – sponsored stories, side bar ads etc.
 - Sponsored Tweets
 - Any form of display advertising e.g. LinkedIn

- Any form of Search Engine Marketing or Pay Per Click advertising e.g. YouTube ads, Google AdWords
- Advertorial – on blogs or publications

Highlighted below are examples of owned, earned and paid media:

| | Definition | Facebook | Twitter | LinkedIn | YouTube | Blogs | Forums | Other |
|--------|--|---------------------|-----------------------|------------------------------|-----------------------------------|----------------------|-------------------------------------|----------------------|
| Owned | Company has control | Facebook Page | Twitter Profile | LinkedIn Company Page | YouTube Channel | Company Blogs | Company Forum | Company website, eDM |
| Earned | Company does not have control | Facebook Users Page | Twitter Users Comment | LinkedIn Profile | User Generated Content or Channel | 3rd Party Blogs | 3rd Party or Independent Forum | News websites |
| Paid | Company has paid or sponsored placements | Facebook Ads | Sponsored Tweets | LinkedIn Display Advertising | YouTube Advertising | Sponsored Blog Posts | Sponsorship of Forum or Advertising | SEM and Banners Ads |

3. What are the issues?

A detailed examination of all the issues is beyond the scope of this guideline, however, any organisation operating in social media needs to be aware of the following:

- False or misleading claims
- Copyright infringement
- Defamation
- Breaches of confidentiality
- Breaches of privacy

Where therapeutic goods are concerned, organisations have additional obligations in relation to:

- Advertising requirements specific to therapeutic goods
- Adverse events
- The ASMI Code's various requirements in relation to "Relationships with Stakeholders" (ASMI members)
- The ASMI Code's requirement for members to behave in an ethical manner consistent with Quality Use of Medicines and that all behaviour be able to withstand public scrutiny and not discredit, or be likely to discredit, the Industry, the Association or the Members. (ASMI members)

These are not comprehensive lists, just a starting point.

Furthermore, "unacceptable behaviour" in relation to social media also includes any action that is manipulative, sexist, racist, abusive, in bad taste or otherwise offensive. The Advertising Standards Bureau (ASB) monitors marketing communications material in digital channels, including social media. Advertisers should be compliant with the AANA Code of Ethics in these channels.

These issues can apply whether the organisation is the author of the content or not (see below).

4. Managing content & social media campaigns

As previously mentioned there are three key forms of online media – owned, earned and paid. This categorisation of online media allows for a simple framework within which organisations can manage their content and campaigns effectively.

| | Definition | Facebook | Twitter | LinkedIn | YouTube | Blogs | Forums | Other |
|-------|---------------------|---------------|-----------------|-----------------------|-----------------|---------------|---------------|----------------------|
| Owned | Company has control | Facebook Page | Twitter Profile | LinkedIn Company Page | YouTube Channel | Company Blogs | Company Forum | Company website, eDM |

4.1 Managing owned content

Owned content is where the organisation has control of the channel, This includes both total and partial ownership of content e.g. an eNewsletter (total) and Facebook Page (partial).

Given the wide definition of “advertising” in the Therapeutic Goods Advertising Code and the even wider definition in the ASMI Code of Practice, owned content is likely to be advertising. Organisations will treat owned content as advertising unless clearly stated otherwise.

4.1.2 Responsibility for user comments posted on owned channels

Any comment or post made by a user on an owned channel is the responsibility of the organisation.

Any comment in breach of any requirement should be removed within a reasonable time¹ of you becoming aware of it. ASMI suggests that a reasonable time frame is 24 hours for large companies, and one week for Small to Medium Enterprises (SMEs). A risk assessment is recommended prior to commencing marketing in social media channels to establish moderation principles and the crisis management approach, should an issue escalate. Organisations should make their social media moderation approach publically available.

Any Adverse Event must be reported in accordance with the TGA's and the organisation's reporting requirements.

4.2 Earned media

Earned media is any third party comment or post made on an online channel such as forums, news channels or blogs.

| | Definition | Facebook | Twitter | LinkedIn | YouTube | Blogs | Forums | Other |
|--------|-------------------------------|---------------------|-----------------------|------------------|-----------------------------------|-----------------|--------------------------------|---------------|
| Earned | Company does not have control | Facebook Users Page | Twitter Users Comment | LinkedIn Profile | User Generated Content or Channel | 3rd Party Blogs | 3rd Party or Independent Forum | News websites |

¹ The ACCC does not specify any particular timeframes. Instead suggesting that the dedication of resources to monitor social media will depend on two key factors: the size of your organisation and the number of fans or followers you have. Depending on the circumstances, the ACCC may expect you to “act promptly” to remove posts, to remove posts “soon after” they are posted or to monitor social media less regularly.
[reference: <http://www.accc.gov.au/business/advertising-promoting-your-business/social-media>].

4.2.1 Managing comments in earned media discovered by social media monitoring

While social media monitoring (also called social media listening, online media monitoring etc.) is not mandatory, it is common practice for many social media campaigns.

Organisations have a responsibility to report adverse events (AE's) as soon as they are made aware of them (consistent with the TGA's and the organisation's reporting requirements). This responsibility is extended to agencies monitoring on behalf of the organisation.

Where an organisation becomes aware of any content in breach of any requirement, they should take all reasonable steps to correct that material.

If a third party blogger publishes content based on an organisation's materials (with the prior knowledge of the organisation), the blog should be monitored by the organisation. This monitoring is limited to the original third party blogger's site, and for a period up to 7 days from the date of material distribution. It must be noted that an organisation will be unable to take down any earned media content (because it is not controlled indirectly or directly by the organisation).

Should an organisation share content it has created with third parties, such as patient or advocacy groups, the organisation should undertake monitoring of the channels within which the content is likely to be shared (e.g. the group's state-based channels, patient blogs, forums etc.).

4.3 Paid media, sponsorship and advertising

Paid media refers to any type of content that has been paid for, sponsored or placed as a result of commercial support – including blogger outreach, influencer engagement, focus groups.

| | Definition | Facebook | Twitter | LinkedIn | YouTube | Blogs | Forums | Other |
|------|--|--------------|------------------|------------------------------|---------------------|----------------------|-------------------------------------|---------------------|
| Paid | Company has paid or sponsored placements | Facebook Ads | Sponsored Tweets | LinkedIn Display Advertising | YouTube Advertising | Sponsored Blog Posts | Sponsorship of Forum or Advertising | SEM and Banners Ads |

As with owned media, organisations will treat paid media as advertising unless clearly stated otherwise.

An organisation's responsibilities in relation to paid media are the same as for owned media (see above). Where content is paid for, whether it is branded, product specific or unbranded – such as Yahoo Answers – the organisation is still responsible for the content.

4.4 Monitoring emerging channels

Social media is dynamic and changes at an unprecedented pace. From time to time, newly integrated channels will emerge and it is important that organisations stay up to date with changes to ensure that campaigns and consumer engagement is ethical and executed to best practice.

4.5 Publishing third-party links on owned and paid channels

An organisation that publishes a link to a third party or earned media site is responsible for monitoring the site that has been linked to. This responsibility includes assessing the compliance of that linked site to the relevant codes and legislation. Alternatively, an organisation must notify the consumer (eg: pop up alert) if they are leaving the company controlled site or company controlled content.

4.6 Employee guidelines

Internal social media policies, which are often developed by corporate affairs and human resources departments, are important to managing reputation. These ASMI Social Media Industry Guidelines are designed to be auxiliary to existing company policies and not a replacement.

4.7 Managing issues and crises

Social media does require a quicker response time in some cases (see 3.1.2) as issues can escalate and spread more quickly over this medium.

Organisations can refer to the Crisis Management Guidelines, developed by ASMI in consultation with other organisations that are available on the ASMI website.

If you are working with an advertising/marketing communications agency on your social media campaign, you should establish the roles and responsibilities of both the agency and the organisation prior to commencing the campaign.

For further information regarding these guidelines, please contact Steve Scarff or Filomena Maiese at ASMI on 02 9922 5111

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