

NFTHD #13: Mandatory information... one click, or two?

In this Notes from the Help Desk, we explore how companies should handle the inclusion of mandatory information in digital promotional materials, particularly in digital advertisements where space is limited. In particular, is a double click-through is considered immediately accessible?

Consistent with Overarching Principle 7, the Code requires that all promotional material with or without a claim (Section 2.1) must include sufficient prescribing information. It is recognised that some of this information cannot be added verbatim inside all promotional material; for example a company needs to provide access to the Product Information (PI) and this is a lengthy document. In the digital context, the PI can be made 'clickable' through a hyperlink, where readers are directed to a website/landing page containing more detailed information. Another alternative is to make this 'scannable' via a QR code. Whatever technology is used, the principle should apply; that healthcare professionals can access the PI immediately. It should not be made hard for them, nor should they need to search for it.

This is not limited to accessibility of PI; the Code also expects that all promotional material to include the public funding status of the product, or a direction to where this information is available. Similarly, whatever technology or statement is used, the principle should apply; that companies should provide healthcare professionals with the PBS status or an immediate means to access this information, and they should not need to search for it.

What does the Code mean by 'immediately accessible?'

This is often interpreted as being accessible via 'one click', or 'one scan'. Whilst this is a good yardstick to use, it is limited by being a yardstick. Using a principles-based Code, we revert to the principle; that the mandatory information that is required for prescribing is made very easily accessible to healthcare professionals. Access should be seamless and as immediate as possible.

How about two clicks?

What if you want, or need to, include more than just the PI, but you can only include one link? In some advertisements, especially with small real estate, the quantity of links is limited can be limited to one. In this case it could be appropriate for that single click to take the reader to a target page that includes additional information - say, a corporate webpage with a product listing, or a product information site with additional materials, or [a digital Minimum PI such as this example](#) - as long as access to that mandatory information is highly prominent. This means upfront and obvious, enabling ease of access.

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The one-click concept is to designed to discourage clicking through to a search engine that requires the reader to enter multiple terms to access the information.

So, one click or two? It doesn't really matter. The ultimate aim is ensuring visibly and easy access of the mandatory information.

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