

# NFTHD #48: Using social media to communicate with HCP's – what to consider?

In this Notes from the Helpdesk, we answer a question about using social media to target communications to a specific audience. Specifically, the company was announcing a PBS listing and wanted to put paid spend behind the posts, so they targeted healthcare professionals (HCPs). Is this allowed and what should one consider in this scenario?

The Code affirms that companies can communicate appropriately with relevant stakeholders, and this includes the ability to proactively engage with consumers and the media (and indeed consumers through social media). We also know that companies can issue a media statement on the legitimate milestones of a product – such as listings - on the basis it is non-promotional. The Code acknowledges that this is not always limited to a media statement; that companies might choose a coordinated multi-channel approach to making this information known, such as social media and other digital channels.

In this scenario, we suggested the best way to approach this was to consider the content, intent and appropriate audience:

**(i) If your message is promotional, it can only go to a healthcare professional audience**

If using social media to communicate with that HCP-only audience, then you would still need to do a prudent check to ensure the audience is HCP only. Vetting your audience to be HCP-only needs to be beyond a simple title search and a tick box approach. So, honing down an audience of people who have put haematologist (example only) as their job title on LinkedIn, is not a strong enough approach to “vet” that they are HCP's. One needs to confirm that the person is a HCP.

It is possible you could still communicate with a HCP over LinkedIn or another social media platform, but if the content is appropriate only for a HCP audience, you would need another layer of vetting. For example, you could have someone cross-check the person to ensure they match up with your own database – or other steps that ensure that the person is as they are saying. We would also encourage companies to consider the ease in which that HCP-only information can be on-shared, and how this risk can be mitigated.

Information for a HCP-only audience via email or inmail or any social media communication avenue, should only be provided once the professional credentials (e.g. AHPRA or other accreditation) of the individual have been established. Examples of strong systems for vetting your HCP-only audience are on the [TGA website](#).

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(ii) If your message is non-promotional, it can go to a wider audience.

In this particular case, it can be appropriate to boost a listing announcement in social media platforms to target an HCP audience. Why? Because the content is non-promotional in nature, appropriate to a consumer audience, and thus just a case of getting more focused traction on a public piece.

Concluding, companies can use social media to communicate with HCP's, but if the content is for HCP-eyes only, then we need to employ robust vetting mechanisms to ensure that we are not unintentionally sharing promotional content with consumers.

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