

NFTHD #55: What's not to love about LIKING (especially LinkedIn posts)

This Note from the Help Desk considers liking and sharing on social media.

Both liking and sharing are active, conscious decisions on content. Whilst we may not have created the content, if we are hosting it on our social media platforms, or circulating it via our respective channels, it essentially becomes our responsibility to ensure that content we are sharing is in-line with our company values, with the regulatory environment, and with our Code.

Liking by itself (as a stand-alone function without the sharing), has a little more flexibility. One could argue that liking another post or article does not necessarily constitute promotion or endorsement. However, there could still be serious implications and risks in liking content that is not Code compliant. Liking a post is not private action; there are three tangible actions that usually happen when one likes a LinkedIn post:

- i. a **PING** (to the author of the content),
- ii. a **PLUG** (LinkedIn may serve up the post in your colleague's newsfeed and mention that you had liked it, according to LinkedIn's algorithm) and ...
- iii. an addition to your **PROFILE** (where it can be found on your articles and activity).

So, liking a post does a lot more than turn the icon blue. It is a small but meaningful act that be extremely helpful in engagement and connectivity, but potentially risky when we are required to not promoting our prescription products to a public non-vetted audience.

Whilst our independent Code Committee has not heard any complaints about liking and sharing under our Code, there have been a fair few in overseas jurisdictions. Given the similarity of contexts (prohibiting direct-to-consumer promotion of prescription medicines), there is merit in taking heed of these, not only because they provide interesting case studies, but they also help us to identify the risks involved in 'liking'.

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Of the listed complaints on the UK-based PMCPA's website, 71 results came up highlighting complaints using the keyword "LinkedIn", many involving the interpretation of promotion through LinkedIn posts, sharing and liking. They highlight some valuable principles applicable to comms on social media and the risks involved:

- Companies are likely to be held responsible for information disseminated by company employees who do so via their private social media channels if the employee can reasonably be perceived as representing the company. Usually this means an employee liking inappropriate content, is considered a company activity or a company 'like'.
- Easy mistakes seem to generate from a UK-based employee liking or sharing USA-based posts, which can be inappropriate for UK context. This also relates to information about clinical trials data and products which are not yet registered in the UK.
- Clear and specific company social media policies are critical. Equally their implementation through regular training and socialisation strategies. Ensure your staff and colleagues know the risks and make conscious ethical decisions in line with your policies.
- Liking an inappropriate post was considered, on the balance of probabilities, to be proactively disseminating the material to their local LinkedIn connections

As you will know, context is key, and the decision to like 'will depend' on the content (and who's sharing and who's receiving). Sharing and liking present us many engaging opportunities which we can utilise. However, lets learn from others and beware of the risks involved, especially with the perceived, potential or real chance of it being interpreted as promotional.

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