

NFTHD #78: Considering engaging a social media influencer?

In this Note from the Help Desk, we address a recurring question in our industry: “Why would we work with a social media influencer?” A useful way to reframe this is to ask, “Why wouldn’t we use social media strategies, including influencers, to better reach our target audience?”

At face value, social media influencers don’t fit neatly in our work - we don’t market our medicines to the general public, and therefore we are less likely to engage an influencer to promote products, services, and brands. However, we do use Key Opinion Leaders or Digital Opinion Leaders, recognising these people to have a credible reputation for their knowledge and expertise on a specific topic and also have the ability to influence a community. Given the power of social media to deliver the right information to the right people at the right time, influencers can be engaged to effectively deliver disease awareness education and engage people living with a condition. They could be healthcare professionals or patient advocates, or any other person for that matter.

There is no special section in the Code that applies only to social media influencers. Think about this like any engagement and any public-facing activity and apply the Code’s principles in this context. Be aware of your legal and ethical responsibilities and your reputational risk. The obvious caveat to any digital public content or activity is that it needs to be non-promotional.

Considerations to guide engagements with social media influencers;

- Rationalize the legitimate need for the activity, decide on the message you want to convey, consider the target audience, and only then decide on the most appropriate influencer to communicate that message.
- Undertake due diligence before engagement; look at their previous posts and engagement, get a sense of what they stand for outside your particular engagement, and assess whether this aligns with your company values.
- Alignment of values; the success of an influencer often hinges on their genuine authenticity for their subject/content. Does the exercise align with the values of the influencer?
- Properly brief the influencer; ensure they understand the need to ensure prescription products are not promoted; this will mean an understanding of what hashtags to use and not use, and whether comments are enabled and if so, who is monitoring these and how frequently. Suggest that 24 hours in the social media world is too long between monitoring.

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- Because influencers are effectively speaking on behalf of the company that has engaged them to do so, your company has responsibility for their content. How is content approved?
- Use fair market value principles to decide on a reasonable fee. Costs will vary significantly depending on which audience you are trying to reach, the type/quantity of media, levels of engagement, the following and content views. If you are using a healthcare professional, their fee is likely to differ significantly from their usual clinical or consulting fee because the service is different. Document this approach.
- Ensure all the usual transparency requirements are met; any company-sponsored activity needs to be known as a company-sponsored activity, and this be transparent to the viewer
- Craft internal policies/procedures or guidelines to guide your company through a solid process before engaging influencers. Many companies have social media policies which have not yet been adapted to include how one can engage a social media influencer.

If your influencer happens to be a practicing healthcare professional, then member companies need to transparently report that payment as a fee-for-service. Disclosure will help the general public to better understand the nature and extent of programs that companies support in the interest of increasing quality use of medicines, advancing patient care and supporting local communities. And reporting payments made to HCPs for their influencing ability falls in line with that objective.

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