

Guidance on Virtual Interactions with Health Care Professional

The COVID-19 pandemic has led to new ways of working for biopharmaceutical companies, which have replaced (and/or added) in-office visits and face-to face congresses with virtual engagements to maintain dialogue and scientific exchange with the medical community while protecting the health and safety of patients, healthcare professionals and their own employees. Virtual interactions, meetings and congresses will continue and will become part of new normal.

The PhAMA Code of Pharmaceutical Marketing Practices 20th Edition set standards for industry business practices, which must be maintained in the virtual setting. In response to Company and Association questions, PhAMA are issuing this guidance on Virtual Interactions on different platform and including Medical Congresses. Notwithstanding any provision made under the Code, all marketing activities under the Code must conform to all existing and relevant government legislation governing the practice of the Pharmaceutical Industry.

Scope of the Guidance

This scope of this guidelines is intended to cover all manner of interactions via digital platform, undertaken either via audio-visuals; and/or interactive virtual platform. This guidance additionally applies to International Congresses participation organized by medical associations/societies involving HCPs from multiple countries.

The PhAMA Code sets out standards for the ethical promotion of pharmaceutical products to healthcare professionals to ensure that member companies' interactions with healthcare professionals, patient organizations and medical institutions are appropriate and perceived as such.

While these requirements were originally drafted for in-person meetings, they apply similarly to virtual meetings.

Guidance

Promotional Material

PhAMA in principle allows to use of digital platform as a form of communication with HCPs, provided that the following requirements are complied with:

- Consent from the respective HCP is obtained prior to communicating;
- Virtual Interactions for business purposes should be communicated from a Company Profile and not associated to Personal Account
- The same requirement as applied to printed materials is complied with;
- The execution of the communication exercise via digital platform is not in conflict with other provisions of the PhAMA Code of conduct;
- Virtual mode of communication is approved by the respective company;
- The presentation (content, links, etc.) should be appropriate and apparent to the intended audience;

Meals during Virtual interactions

The PhAMA guidance allows provision of meals to HCPs participating in virtual meetings.

- Does not include HCPs who are attending the meetings from their home as they are already expected to be accessible to their daily meals.
- In a normal circumstance, hospitality may be extended to HCPs who are dialling in from the clinics during meetings as the meeting would most probably be squeezed in during the HCPs meal time.
- Food vouchers will not be allowed in any initiatives as it is equivalent/ interchangeable with cash.
- Food vouchers is not expected to be utilized during the point of time of virtual meetings, but after and hence can have a cash value and thus not allowed
- Meals provided must be reasonable and modest (limited to 50MYR per person per meal – excludes GST and delivery charges), therefore upholding the integrity and reputation of the industry.

International Congress/Events Sponsorship/participation

As per PhAMA Code 7.2, Member companies may sponsor healthcare professionals to attend External International Events/meetings provided such sponsorship is in accordance with the following requirements. The same guidance will apply also Virtual International Congress/Events Sponsorships and participation

- There are no limits to local sponsorships
- Limited to maximum twice per year/company for each healthcare professional
- Must not be conditional upon an obligation to prescribe, recommend, purchase, supply, administer or promote any pharmaceutical product.
- Sponsorship from either a local representative entity or from the regional body is considered as sponsorship from a same entity.
- Member Companies should ensure that a process is in place to confirm participants' status as HCPs/Non-HCPs (patient advocates, industry representatives, etc.).
- It is important for Companies to clearly state the label by which promotional materials were developed, to avoid any possible confusion.
- The promotional material must be accompanied by a statement indicating the countries in which the medicinal product is registered, and by an explanatory statement indicating that registration conditions differ internationally.
- Congress attendees should sign a digital consent indicating awareness/acknowledging Virtual Congress terms and conditions, such as specific permission to access different virtual areas (lectures, commercial expositions, social engagement sites, the basis of promotional material development, etc.).
- Even if this is the responsibility of the medical association/society, Companies need to be aware of the content of these kinds of Explanatory Statements/ Disclaimers.
- Companies should explore putting in place systems to appropriately address the situation where HCPs view materials from countries other than their own. Of particular concern is potential promotion directed to people not qualified to receive such content and promotion of unlicensed medicines and/or indications.

(Following are the current provisions relating to the same topic, in the PhAMA Code of Conduct 21st edition):

Section 13.5 of the PhAMA Code of Conduct

13.5. Use of Social Media Communication All Social Media Communication for business purposes should be communicated from a Company Profile and not associated to Personal Account. All information shared in Social Media for business purposes need to be appropriate, accurate and fair for public viewing and understanding. Information including:

- A product name/logo (either brand or generic) is not allowed as direct to consumer promotion is prohibited.
- Any description that could refer only to a specific product (e.g. a therapeutic class in which there is only one product) is not allowed as well.
- A disease area/indication will need to be reviewed and approved by the relevant function in accordance to the approval process of the respective member company.
- Company branding should be shared in the social media platform for transparency. If required, the information shared should be accompanied with referencing, scientific disclosure, conflict of interest and privacy statement.

Member companies are responsible for the information uploaded onto their website.

Appendix C

The Use of The Internet for Pharmaceutical Information - The PhAMA/IFPMA Position

The Internet has the potential to be a vital and positive resource for society. Although it is continuing to evolve, it has already demonstrated its remarkable ability to inform and educate global audiences on a wide range of subjects including health care and medicinal products.

- The research-based pharmaceutical industry, represented by PhAMA and the International Federation of Pharmaceutical Manufacturers Associations (IFPMA), strongly supports the right to use the Internet as a means for providing accurate and scientifically reliable information on medicines in a responsible manner, for the benefit of both patients and healthcare professionals.
- Measures to regulate the Internet require caution as they could inadvertently impose unacceptable constraints on legitimate communication and information flow. The unscrupulous will always evade controls whilst the law-abiding will comply. Inappropriate regulation could result in a situation where unregulated and unreliable sources of information remain on the Internet, unchallenged by reliable, authentic sources and legal authorities.

The End/-