



HCA SOCIAL MEDIA GUIDANCE

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Introduction

Since the publication of the previous Healthcare Communications Association’s (HCA) social media guidance, there have been significant developments in how healthcare professionals (HCPs), patients, and the broader public engage with social media platforms. The emergence of influential new platforms such as TikTok, as well as the transformation of Twitter to X, has notably reshaped the social media environment. Furthermore, updated guidelines from professional bodies such as the Prescription Medicines Code of Practice Authority (PMCPA) and the European Federation of Pharmaceutical Industries and Associations (EFPIA) now provide a more robust framework of principles for pharmaceutical companies and healthcare communication agencies to follow.

As such, in developing updated guidance we are not looking to ‘reinvent the wheel’. Local regulatory and legal frameworks should always be consulted in the development of any social media activity. Similarly, many pharmaceutical companies will have their own protocols around the use of social media, particularly relating to how employees engage with and talk about their own company brand.

But yet, we also know that with a wider range of available guidance, rules and regulations, comes occasional confusion and ambiguity; or perhaps a tendency to always take the more conservative option, even if this is not the most effective way of reaching the intended audience.

We have created this document as a concise reference to address key considerations in social media development in accordance with the PMCPA code. It outlines how agencies, in-house pharmaceutical teams, and independent compliance consultants have interpreted the code and applied it to some of the most common social media activities. This document is intended to supplement, not replace, formal codes of practice; and aims to assist teams in developing compliant social media communications for HCPs, patients, and the general public.

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Key areas of social media compliance



Disclaimer: The guidance provided in this document is based on personal opinions and views and does not represent formal company policy or legal advice. Readers are strongly encouraged to seek guidance from their own compliance leads or relevant advisors before engaging in any professional activities on social media within their field, to ensure adherence to applicable regulations and organisational standards.

Prescription-only medicines

What the PMCPA guidance states

The EFPIA Principles for the use of digital channels states that a company owning the social media page or site is responsible for the content, for example, any mention of a prescription-only medicine (POM) is likely to be considered promotion of that medicine to the public and is prohibited. In addition, the PMCPA informal advice is that, in general, the product name (brand or generic), particularly if alongside its indication, is likely to be seen as

promotional and it is advisable for pharmaceutical companies to take this approach and then show that the material is not promotional.

It is also an accepted principle under the Association of the British Pharmaceutical Industry (ABPI) Code that depending on the context, a product could be promoted with either the product name, indication, or even without its name ever being mentioned.

Disease awareness

What the PMCPA guidance states

Disease awareness can be conducted by a pharmaceutical company via social media provided that the purpose is to increase awareness of a disease or diseases and to provide health educational information on that disease and its management [...] The use of brand or non-proprietary names and/or restricting the range of treatments described in

the campaign might be likely to lead to the use of a specific medicine. Particular care must be taken where the company's product, even though not named, is the only medicine relevant to the disease or symptoms in question.



The agency view

Although this is the most important and perhaps most obvious part of the guidance, it's definitely a space in which we have seen grey areas. Obviously, mentioning the product or generic name is a big 'no no' but there have been times in which the context of a specific topic has caused us to question whether an intended post would be compliant. For example, a disease-awareness focus post that talks about weight loss and diabetes could be linked to the benefits of a specific product. Social media can be a great vehicle for messaging, but we always start by assessing what is the most important message to get across, who is the intended audience, and can social media be a compliant place to achieve both those objectives. If not, should we consider a different channel?



The pharma company view

This is obviously one of the biggest pieces for us to consider in-house. As a general rule, we do not post anything that is promotional organically on our LinkedIn channel.

We have carried out targeted campaigns to HCPs, driving to promotional sites or advertising promotional meetings, however, the standards and regulations for the posts themselves are high. No mention of the product is allowed in the post, and we have to be clear that we are driving to a promotional site. Any site/meeting we are driving to is then behind a firewall, where an individual must verify that they are an HCP in order to access the information.

We also pay special consideration around disease awareness in areas where we may be the only treatment, or if it could be construed that we are talking about a product benefit and have to work very closely with our medical colleagues in these situations.



The independent compliance consultant view

Not identifying a POM is the most important consideration when engaging members of the public. The ABPI Code is clear that you can promote via an indirect reference to a medicine. We have recently seen the ASA and the Medicines and Healthcare products Regulatory Agency (MHRA) confirm this stance in their approach to policing private healthcare providers offering with weight loss products.

The main approach to staying compliant is whether or not the audience will recognise what drug you're talking about. Of course, this simplistic approach falls short a little because there are ways we can safely identify a product without being promotional. Disease-awareness campaigns are one such example where in theory you can identify a product and retain the non-promotional status. For the majority of activities on social media, we should not identify a product.

The majority of social media complaints stem from a product being identified.



The agency view

Probably the lion's share of social media content we have co-created with the pharma industry has been disease-awareness focused. Social media can be a great place to doorstep the unaware and provide compelling stats and real snapshots of human experience. Sometimes, pharma is criticised for its disease-awareness content in comparison with non-profit organisations sharing similar messages. But I think the industry has a real chance to share messages of hope, particularly in areas of rare disease that do not get so much attention on social media.



The pharma company view

Disease awareness is a mainstay of our social media content. We often work in partnership with patient organisations, and our preference is to drive patients to patient organisation sites for information.

In most cases, we use a mixture of quantifiable statistics, coupled with patient case studies and experiences, to illustrate the effects or burden of diseases.



The independent compliance consultant view

The approach at the heart of disease-awareness campaigns should focus only on raising awareness or educating the public; if this is so, you are likely to remain compliant. Complications arise when we want to list the potential treatment options. This can be done but must be in a way that is non-promotional and balanced, meaning you must list every single option, including non-pharmacological and lifestyle choices.

In theory, this is simple to do. In practice, it is harder on social media as there are usually restrictions on the amount of detail we can add. A pragmatic approach would be to only include treatment options on a dedicated disease-awareness website, that way you can ensure each option is covered with equal prominence, mention, and emphasis.



Third-party collaboration (Working with influencers)

What the PMCPA guidance states

Transparency is critical and the relationship between the pharmaceutical company and the influencer must be made clear at the outset [...] Engaging with online influencers requires careful consideration, including assessment of the risks of undue influence on HCPs or the public, or risks that such digital content

could be perceived as improper promotion of medicines [...] The company might be held responsible under the ABPI Code for the influencer's actions even if they act contrary to their written agreement/briefing.

Hashtags

What the PMCPA guidance states

A hashtag is a word or key phrase preceded by a hash symbol (#). Hashtags are used within social media posts to help those who may be interested in the topic to find it. Clicking on a hashtag would take readers to the hashtag's feed where they could see content posted which related to the hashtag topic and view

all posts which mentioned that hashtag. Caution must be taken by pharmaceutical companies to ensure that appropriate hashtags which are relevant to the content are chosen. Choosing a hashtag that contained a claim for a POM would likely constitute promotion.



The agency view

There is a lot of reticence about working with influencers, particularly around the latter point that the company may be held responsible even if the influencer acts contrary to their briefing. In reality, I have rarely seen issues arise when the influencer has been fully assessed prior to contracting, has been fully briefed, and documentation is watertight. I think the most challenging part is identifying the right influencers as the most energetic and exciting people online, are often the ones with the saltiest and most provocative opinions. However, with due diligence, a strong influencer can really help you shape your messaging in a way that resonates with your desired audience and also provide access to a ready-made community of followers.



The pharma company view

Influencers are a powerful tool to expand the reach of disease-awareness campaigns, especially on platforms such as Instagram or TikTok, where the pharma company may not have a presence. We have to undertake a thorough identification and vetting process to ensure we are working with the right people. We also develop thorough briefing documents and hold often multiple sessions to ensure the influencer is fully briefed. There is, however, a natural risk when working with a third party, and we've recently seen in code reports that there have been instances where an influencer acted outside of their scope, which, though mitigated by written and verbal briefings, was still ruled in breach of the code. These situations are something that gives us pause when considering working with influencers.



The independent compliance consultant view

Our approach to working with influencers is no different from how we might approach engaging consultants in any other activity. In 'code speak', working with influencers is simply hiring a consultant to engage in work. Whether you call this a fee for service arrangement, engaging consultants, or working with influencers, the core principles are the same. You must ensure you have a contract before any work begins, you must pay a fair market value for the work, you must brief the consultant thoroughly making sure that your involvement with them is clearly declared on all the outputs.



The agency view

Since the PMCPA guidance was released, we have seen many clients withdraw from using hashtags altogether. This is understandable, as when clicking a hashtag it is not clear that this could send a user to content that might mention a POM and some hashtags may make this more likely, particularly if they were used around the time of a data release. In reality, the latest we have heard from the social networks suggest that hashtags are being deprioritised by the algorithms, which are becoming better at understanding the full picture of what engages an individual user and at delivering relevant content based on their interests.



The pharma company view

Our approach to using hashtags is generally the fewer, the better. We always check hashtags for the previous few months, before we use them in our post, and often err on the side of caution when considering using them.



The independent compliance consultant view

Hashtags are very interesting and bring a couple of key questions to mind. First, is a hashtag essentially a link? Second, is the hashtag changing the context of the message? The first question can be answered safely with 'NO'. Hashtags are not links, but functionally, they could be considered so as they link content together. Our advice is that you review the associated content with the hashtag you plan to use to make sure you are

not accidentally associating your post to promotional content or misinformation. Realistically, there is only so much control you can have over a hashtag, but this does not mean you can't be sensible in your approach. The second question is where it gets fun. We think there is a difference between using a generic hashtag like #compliance and a specific one like #ABPIcompliance. One is wide ranging whilst the other conveys a more specific message. If you introduce a specific hashtag, we think you will have more responsibility for it. For example, if a (fictional) company was to introduce a very specific hashtag like #LakeshorePharmaHealthWeek, that company is likely to held more responsible for all the content associated with that hashtag. Consequently, they will be at greater risk if the global affiliate is using the hashtag to promote in a country where direct-to-consumer POM promotion is allowed. Lastly, the content of hashtags is important as they are part of the main content so you should not use product-specific hashtags. Even therapy-area-specific hashtags like #AsthmaWeek can push a post to being certainly promotional if you have identified a product elsewhere (even behind a link or in an image).

Linking and tagging

What the PMCPA guidance states

Pharmaceutical companies should be confident about the choice of linked information/websites and that these do not promote POMs to the public or contain otherwise inappropriate content [...] Individuals have control over whether to tag others in their posts. In that regard,

pharmaceutical companies/employees that include tags as part of their posts and therefore direct readers to other accounts, need to be satisfied that the content on those accounts are appropriate as far as the ABPI Code is concerned.

Personal responsibility

What the PMCPA guidance states

If an employee's personal use of social media was found to be in scope of the ABPI Code, the company would be held responsible. Pharmaceutical companies should assume that the ABPI Code would apply to all work-related, personal social media posts, for example, LinkedIn or Instagram posts/activity

by their employees unless, for very clear reasons, it could be shown otherwise.



The agency view

It's rare that our clients would want to include a link to a piece of content that is not on one of their owned websites, so we don't see too much reticence or risk in this area. However, tagging is another story. It is good practice to always gain permission before tagging another user's profile in a post, but being aware of subjects they post about is paramount. In general, it is probably better to encourage relevant users to reshare your post rather than tag them. But some companies may have specific rules about whether this is allowed or not. We like collaboration posts on Instagram, where the company and another user co-own a post, and have access to its metrics, control over its publishing, and access to a wider following.



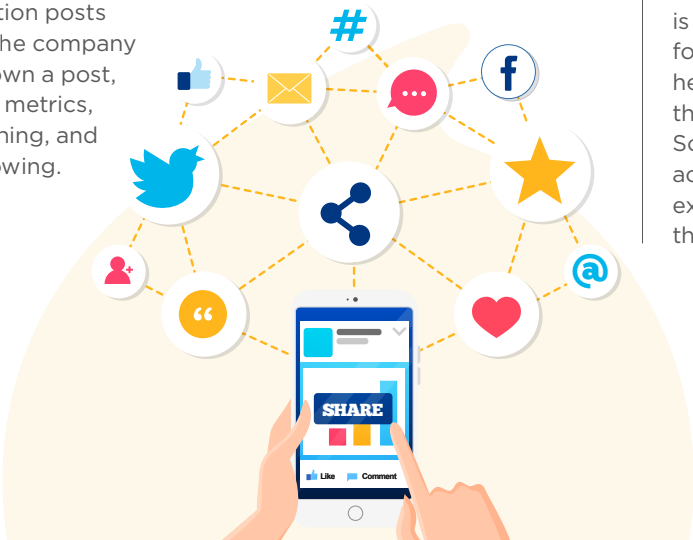
The pharma company view

As general practice, we always seek permission before tagging individuals in our posts and conduct a thorough review of the individual's own posts before deciding if it's appropriate. When linking to external sites, they are generally either owned and PromoMats reviewed sites (and therefore should be compliant with code), or they are patient organisation partner sites, which we would review before linking out to.



The independent compliance consultant view

Firstly, the social media guidance and previous code cases have it clear that links are fundamental parts of the post. This means that whatever is behind that link might as well be part of the post itself. The majority of complaints we see involve a link that has identified a product or that includes promotional content. Be very careful when linking to other websites. With this basis, the approach to linked profiles should follow the same caution. Although a company is unlikely to held responsible for the linked profile, they will be held responsible for whatever they direct their viewers to see. So, make sure any links do not accidentally promote a POM or expose the audience to content that is not suitable for them.



The agency view

While the guidance and code relate to all personal social media platforms, LinkedIn presents the most frequent challenges due to the explicit display of its users' location and company affiliation. We have seen cases of companies who have fallen foul of the code when an employee with a global role has engaged with a post from outside the UK that mentions a POM, however, they have not realised that their LinkedIn profile registers them as a UK resident. Employees who are shareholders should put their employee duties first. Although companies may post financial updates on social media, employees should be cautious before liking or sharing such content, as it may relate to POMs. Most of our clients now have a very robust process to help employees know what content they can and can't engage with. This is great, as long as it doesn't scare people off, because employee content receives exponentially better engagement than company content.



The pharma company view

Each pharma company is likely to have robust and unique guidance around employee social media usage, and engagement with their corporate channels. Whilst some may allow their employees to post about and engage with corporate content, others may prevent it entirely. Some pharma companies deploy specific hashtags to indicate to their employees that they are allowed to engage with specific posts (e.g. NovartisOK). It's important to familiarise and align your communications strategies with these policies, especially when considering internal comms or employee advocacy campaigns.



The independent compliance consultant view

There are multiple ways companies have responsibility for their posts and employees. The first is ensuring that content posted on their platforms is suitable for the audience. There is a need to signpost who that content is suitable for, i.e. for investors only or for HCPs only. Without a signpost, the content is taken to be suitable for the general public by default. This might not be the case hence the company is risking not maintaining high standards. Company responsibility for employee behaviour is well documented. This is where the majority of code complaints stem from. A UK employee likes a post that was not meant for a UK audience, thus bringing the post into scope of the ABPI Code. Employees and third parties must ensure their conduct on social media is in line with company policy and does not promote to the public.



If you would like to get in touch to discuss anything in this guidance please contact us at **info@the-hca.org**