

All rights reserved. Requests concerning the reproduction/translation of all or part of the document (and, in particular, any figures or tables) should be addressed to the EDQM HelpDesk, <http://www.edqm.eu/hd/>.

Otherwise, short extracts may be reproduced, on condition that they are not used out of context and do not provide incomplete information or mislead the reader.

The source must be duly acknowledged.

European Directorate for the Quality of Medicines & HealthCare (EDQM), Council of Europe
7, allée Kastner CS 30026 F-67081 Strasbourg France
www.edqm.eu

© Council of Europe, 2021

This publication was drafted by the European Committee on Minimising Public Health Risks Posed by Falsification of Medical Products and Similar Crimes (CD-PH-CMED) of the Council of Europe. For more information, please visit <https://go.edqm.eu/CMED>.

INTRODUCTION

Much of the illegal trade in medicines in Europe takes place on the internet, and social media is increasingly used not only to sell medicines illegally, but to make false or misleading claims in respect of the products being sold. The COVID-19 pandemic caused an upsurge in the use of social media to offer products claiming to treat, prevent and diagnose the virus and for misinformation around remedies, cures and particularly vaccines. Additionally, social media was used for fraud and scam-like schemes profiting from the high demand for vaccines against the SARS-CoV-2 virus.

Patients and consumers rarely take the time to check official websites to verify such claims, even if they are aware of these sources of reliable information. For this reason, the Committee of Experts on Minimising Public Health Risks Posed by Falsification of Medical Products and Similar Crimes (CD-P-PH/CMED), conscious of the importance of social media, decided to gather information from health regulatory authorities on how best to use social media to promote their own messages and advance their objectives. This document has been drafted to support regulatory authorities at national level regarding their use of social media in communicating with the general public.

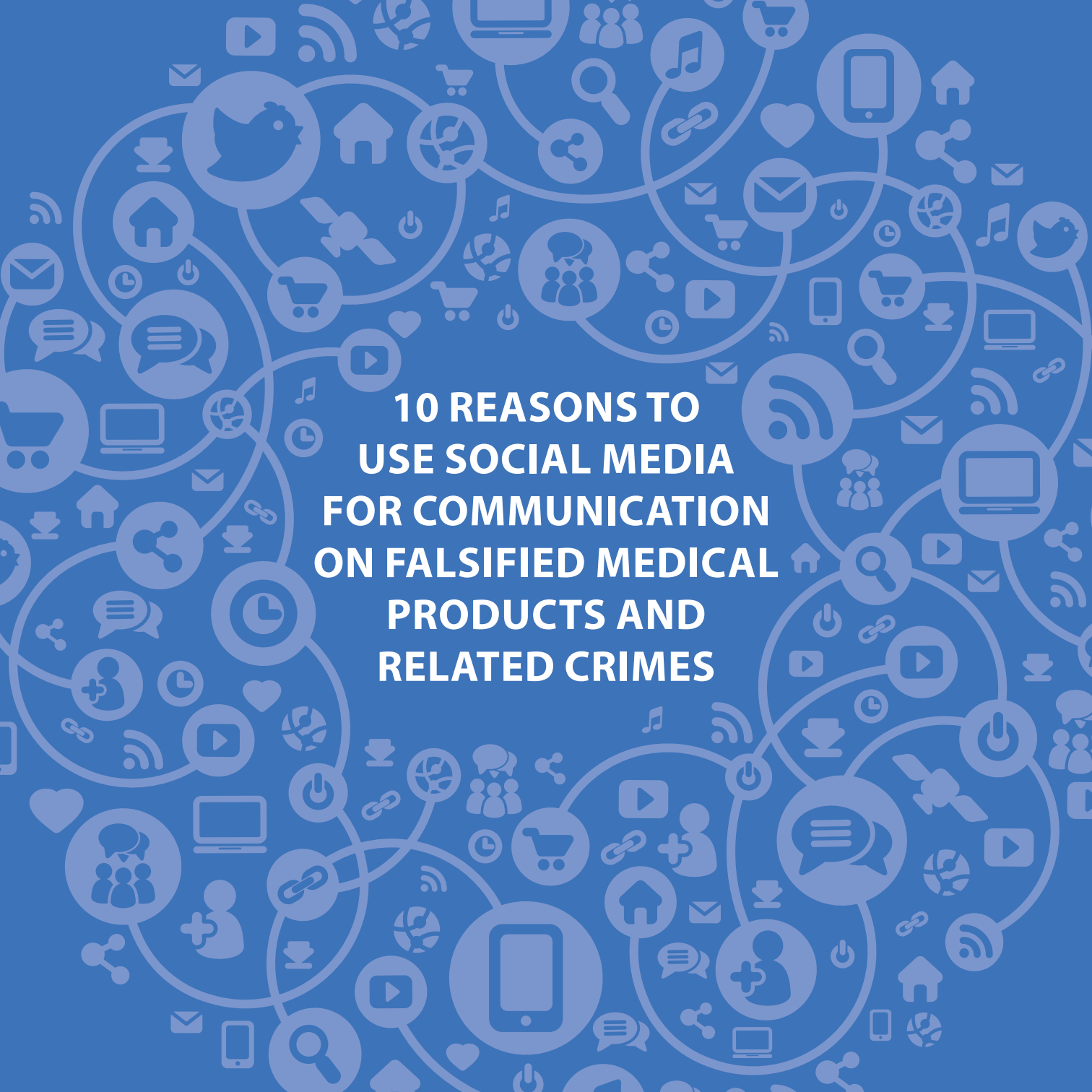
THE IMPORTANCE OF SOCIAL MEDIA

Social media is one of the most prominent manifestations of digital communication in our societies, and forms an essential pillar of many governmental authorities' communication strategies. The main purpose of social media is to communicate and share ideas, opinions and information between different people, target groups and stakeholders. Many organisations at national level already use social media to reach out to new target audiences and inform them on how to recognise new dangers and illegal activities related to the commerce of medical products.

More efforts are needed to highlight real-time enforcement action by regulatory agencies to increase their public profile and raise public awareness. Agencies also need to be alert to new channels used for illegal trade or advertising.

This document aims to provide a summary of best practices that can help national competent authorities (NCAs) for medical products communicate more effectively through social media with the general public, to better inform them about important public health issues and, in particular, to fight more effectively against the falsification of medical products and similar crimes.





10 REASONS TO USE SOCIAL MEDIA FOR COMMUNICATION ON FALSIFIED MEDICAL PRODUCTS AND RELATED CRIMES

1. To expand reach

By providing an active hub for information and interaction on social media, organisations can broaden their reach and provide citizens with a channel to engage on specific topics. This is especially important with regard to communicating on falsification issues, as the right information needs to be disseminated as widely as possible.



2. To manage public perception and increase awareness

Social media can be an innovative means of informing the public of the organisation's mission and initiatives. By keeping up with trends in digital engagement, communicators can be more effective in conveying information and can also help improve how the public perceives their organisation. In this case, social media can help deliver important, timely information on falsified medical products and related crimes to the general public. Social media can also be an efficient and rapid way to provide information about cases of falsification for those NCAs that may be lacking time or resources.



3. To gather information from the public on communications needs

Social media is also an effective way to gather information and get feedback on the needs of the public. Data and insights collected from followers on social media can offer a valuable basis for defining communication activities. Citizens can be encouraged to provide input on various topics or initiatives through polls and surveys, social media chats or other specific interactive programmes. Data gathered from social media can also offer insight into which communication activities and campaigns seem to work best.



4. To create stronger engagement with the public when resources are limited

Social media is not only an efficient and low-cost channel for dispatching information, it can also help create a dialogue with the public. For NCAs with limited human resources for campaigns and communication in general, social media offers a platform to exchange with the public on sensitive issues that need constant public attention, such as falsified medical products.



5. To better understand user behaviour

Social media can also make it possible to achieve real-time insights into what information citizens are interested in, where they are most likely to look for that information, and how communicators can best provide specific information or launch calls-to-action. Social media also provides a way to increase the number of visits to websites that suffer from low visibility, or to encourage the public to use specific tools and consult information made available on NCAs' websites.

6. To improve services and user experience

The feedback provided by the public on social media can be used to improve services. In most cases, social media users will be willing to share their expectations and needs if asked, for example through a survey. Even negative feedback received on social media can provide insight on how to better adapt communication activities and campaigns. Public feedback is extremely important and should be seen as an opportunity to improve activities and initiatives aimed at protecting public health and safety.



7. To convey an authentic and transparent image

Authenticity and transparency are appreciated by the public and focusing on these values is an effective way for an organisation to gain public trust. Trust is a key aspect which drives public engagement, and is increasingly important when communicating on sensitive topics such as public health or falsified medical products. Timely, verified and transparent information flows on social media are essential to ensuring successful outcomes.



8. To position organisations as providers of reliable information

Criminals dealing in falsified medical products also use social media, but they do so to advertise and sell their products. For this reason, it is important that NCAs convince the public that their social media spaces are a source of truthful, reliable information. Organisations should also co-ordinate and co-operate their action with partners and allies who are also present on social media (for example, organisations representing or protecting patients' or consumers' interests and rights), involve them in their campaigns and alert them to illegal activities online.



9. To benefit from new forms of accessibility and smartphone technologies

Smartphones are quickly becoming the device of choice for social media users. In this regard, organisations should consider making their information accessible for these devices as a way of increasing the chances of engagement. Having easy-to-reach, up-to-date and relevant social media accounts means helping the public to get pertinent information when and where they choose using their smartphones. Social media may even enable individuals to verify the authenticity of a particular product in real-time, and, if necessary, to report non-conformities directly to the competent authorities.



10. To use efficient and simple communication alternatives

Most social media platforms are free and accounts can be set up and run at very little expense compared to traditional print or broadcast media. Their use, including gathering data and analytics, is also relatively simple and does not require an IT background or specific expertise. A dedicated team entrusted with managing social media should nevertheless be in place to organise campaigns and respond to public feedback in real-time.



IMPORTANT MATTERS TO CONSIDER BEFORE GOING ONLINE

Setting up social media channels for your organisation and managing your online presence requires some forethought. The checklist below can provide an indication as to whether your organisation is ready to be an effective online force in the fight against the falsification of medical products.

- ☐ Foresee resources and train staff members on running social media accounts.
- ☐ Centralise decision making on the choice of channels, messages and tone.
- ☐ Define key social media accounts.
- ☐ Rationalise their use if several social media accounts have been set up.
- ☐ Use the appropriate software and other tools to manage posts.
- ☐ Monitor all social media activities and feedback from the public.



BEST PRACTICES

1. Co-operation with partners

Regarding the particular issue of falsified medical products, organisations active in this field may also consider establishing good co-operation with social media platforms, by identifying a contact person within them and maintaining open communication lines to gain their support in reporting suspicious or illegal conduct. This will also help find common solutions for dealing with behaviour that can pose a threat to public health, such as illegal advertisements that should be removed from a specific social media platform.

2. Official social media accounts

Regarding the use of social media, it should be clear who can have access to a particular platform or account. Only official accounts of NCAs or international organisations can be used to make public posts and only authorised staff members should be able to post in the name of the organisation.

3. Content validation and approval

All content transmitted through social media should be approved and agreed by the relevant people within the organisation. An efficient and comprehensive internal validation and follow-up process should be set up and followed, taking into account the matters below.

4. Objectives, targets, means and outcome

Before posting information on social media, it is good to consider first the objective(s) to be achieved by individual posts, the main target audience, the intended outcome, and, in view of these points, the best and most effective social media networks to reach the specific targets and expected outcomes.

5. Confidentiality and copyright

It is also a good practice to ensure that the content of social media posts does not inadvertently include any information that could be considered confidential or personal. Copyright material too (including texts, images, videos or music) should never be published without permission.

6. Clear and coherent messages

The language and content of social media posts should be clear and comprehensible for the intended target groups (for instance, avoid long or complex sentences, jargon or specialised terminology), and grammatically and stylistically correct. When using several social media platforms, content should be consistent across them and follow the same style.

7. Correct language and tone

Beyond being comprehensible, organisations should also ensure correct language and tone when interacting with social media users. Messages should be polite, neutral in tone and objective in content. An ill-considered message risks generating confusion, a hostile reaction, unnecessary anxiety or even panic in the public if misunderstood.

8. Carefully considered responses

Regarding tone, although strong messages may be effective, it is always good to respond calmly, politely and assertively to all concerns that social media posts might generate.

9. Accurate, succinct information

When communicating on public health issues, it is important to provide accurate and succinct information and to ensure that posts do not inadvertently generate publicity for illegally operating websites, unregulated products or inappropriate publications.

MORE PRACTICAL ADVICE

Social media channels should be selected based on their relevance, depending on the message to send and the target audiences to be reached. Many resources can be found on the web to help identify the best channels for reaching out to specific audiences.

1. A dedicated team should work on social media, with well-defined tasks for each of its members and descriptions of procedures for drafting posts and approvals. The publication process should be described with clear tasks, and streamlined approval procedures can be defined depending on the sensitivity of topics/issues.
2. Software and similar tools can facilitate the publication process on different media channels. Relying on editorial calendars and planning posts in advance are also good practices.
3. Most content for social media can be prepared in advance, including key messages, topics, statements, visuals or hashtags that are relevant to specific topics and audiences.
4. Sensitive and problematic topics should be covered on social media as well. To this end, having considered content and responses ready in advance ("lines to take") can help better manage debates or criticism.
5. Images and visuals are particularly important. Images should be selected carefully, ensuring that they are comprehensible for most audiences, are not dramatic or inadvertently ironic, and do not offend any particular sensibilities.
6. Software for producing simple animated images and multimedia in-house offer an easy way to liven up a social media channel.
7. Statistics on reactions to social media activities are useful for evaluating impact. Data analytics offer valuable insight into audiences and their habits, including for instance the best times of the day to publish posts.
8. It is important to regularly monitor mailboxes for messages, notifications and comments. While not all comments need to be addressed, it is useful to maintain an overview of followers' opinions and reactions. Social media channels should be checked on a daily basis at least.
9. The ideal social media post should be brief, relevant and engaging for the target audience.
10. Connecting with partners is also important on social media; following their accounts enables your organisation to repost and comment on their content, and to ask them to do the same in return.

IN CONCLUSION

Social media offers an effective means for communicating with the general public on public health issues, including falsified medical products, but they should not be used blindly. Above all, get informed about social media, get training for anyone using or managing social media to represent or communicate about your organisation and its aims, especially where illegal trade of dangerous health products is concerned, and check how other authorities make use of them to promote their objectives.

REFERENCES

- Council of Europe Social Media Plan
<https://rm.coe.int/social-media-plan/168098ddcb>
- EU Social Media Toolkit for Healthcare Professionals
<https://op.europa.eu/s/ou6o>

The Committee of Experts on Minimising Public Health Risks Posed by Falsification of Medical Products and Similar Crimes (CD-P-PH/CMED) is a committee of experts who are familiar with the problem of falsified medical products, and who come from an enforcement background mostly from health, but also from customs or police authorities. It serves as a platform for exchange of information, support, co-operation and initiation of projects in order to make progress in the fight against falsified medical products. The committee also supports the work within the Council of Europe MEDICRIME Convention and its Committee of the Parties.

The European Directorate for the Quality of Medicines & HealthCare (EDQM), a directorate of the Council of Europe, is a leading organisation that protects public health by enabling the development, supporting the implementation and monitoring the application of quality standards for safe medicines and their safe use.

The Council of Europe is the continent's leading human rights organisation. It comprises 46 member states, including all members of the European Union.