

# Medicines Promotion Regulations for Communications Personnel Summary

## 1 Requirements for statements

- Non promotional communications should not include content that might be perceived as promoting a medicine
- Information should be relevant to the target audience
- News should be 'newsworthy'



## 2 Sharing off-label information

The circumstances where sharing of off-label information is allowable are:

- When there is a legitimate business need
- In response to an external request
- When there is an established expectation e.g. business press releases, scientific publications



**Remember:** If requirements in sections 1 and 2 are mis judged, the potential consequences are being found guilty of off label promotion, disguised promotion or promotion to the general public. This can lead to damage to AZ's reputation, as well as various sanctions (which can include fines and imprisonment). **Most importantly it can lead to patient harm.**

## 3 Working with the media



All press releases should prominently state the intended audience including a geographic description. They may include backgrounders, B roll and patient case studies. The intended audience may be business, consumer or medical.



Treat journalists as members of the public - they should not be sent promotional information. Companies are responsible for information they provide to journalists, but not necessarily for articles that journalists subsequently write.

For interactions with journalists (usually press conferences):

- Hospitality must not be excessive
- Journalists cannot be paid to attend
- AstraZeneca does not pay travel expenses for journalists
- The press conference must meet usual rules for balance, fairness, etc, and be completely non-promotional
- Presenters and spokespersons should be briefed not to promote products
- All material must be approved in advance



## 4 Digital Considerations



Approval must be in complete and final form - interactivity, downloads, links, metadata etc all need to be checked for compliance with regulations.

When considering target audience, treat anyone who is not a health professional as a member of the general public. Note that 'filters' on social media are not considered adequate for targeting health professionals.

Digital media must conform to regulations covering data privacy, security and confidentiality.



## 5 Working with patients and the public

Material for the general public must be non promotional in content, appearance and tone as well as factual, accurate and balanced.

Patients are a special subset of the general public.



**Disease Awareness Campaigns:** The primary purpose must be to increase awareness and knowledge of a disease - not a particular treatment.

**Patient Organisations:** Pharmaceutical companies may interact with patient organisations but must always respect their independence. Work should be covered by suitable contracts/agreements.