



# **G U I D E L I N E**

**on handling extraordinary  
events in social media**

**at  
Bayer Animal Health**



Bayer Animal Health	
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<p>Guideline on handling Extraordinary Events on Social Media.</p> <p><u>Please note that this document is a best practice guideline for use by communicators &amp; screeners. It's the highly recommended procedure if the screener identifies an extraordinary event that includes information on a potential AE or potential PTC.</u></p> <p>These guidelines follow the <a href="#">Margo: 2030 „Social Media Usage“</a></p>	

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## I. Abbreviations

EE	Extraordinary Event
BAH	Bayer Animal Health
CH	Country Head
CQH	Country Quality Head
LDS	Local Drug Safety
LDSR	Local Drug Safety Representative
OI	Operational Instruction
PQSC	Product Quality and Safety Committee
PTC	Product Technical Complaint
PV	Pharmacovigilance
QA	Quality Assurance
SOP	Standard Operating Procedure

## II. Regulatory basis/ References

- (1) Reference: [BAH-RD-SOP#0295 Handling of Potential Adverse Events and Potential Product Technical Complaints from Social Media](#)  
(Please contact LDS unit or [gppv.bah@bayer.com](mailto:gppv.bah@bayer.com) if access is not possible)
- (2) [Corporate Policy: BHC Margo:2030 „Social Media Governance“](#)
- (3) [Issues and Crisis Management of Policy& Stakeholder Affairs at Bayer Animal Health](#)

## III. Preface

This document provides a practical guideline on how to handle extraordinary events in social networks and describes the processes all relevant actors dealing with global or country social media have to follow.

The approaches, tools and measures described here are part of crisis communication of Bayer Animal Health.

## IV. Definition & Responsibilities

### Owner of Social Media Activity

The owner of the social media channel is responsible for monitoring all inbound messages (posts, comments, etc.) on a daily basis in order to ensure early identification of a potential adverse event and/ or potential product technical complaint, and to forward it to LDS unit within the defined timelines.

This task can be delegated to another function or an external service provider for execution, (e.g. a Digital Media company contracted to manage social media activity), however, responsibility remains with the original individual/role. If an external service provider is responsible for this task LDS is to be informed and involved in contract preparation.

The function responsible for performing content monitoring in social media channels is referred to in this document as the “Screener”.

#### Screener

- (1) Performs content monitoring (such as messages/posts or comments): monitoring/ screening on BAH social media channels daily.<sup>1</sup>
- (2) Responsible for first communication with the reporter in case contact details are missing.
- (3) Once the information is obtained, the Screener is responsible to forward it to the LDS unit in the country, and if applicable, additional functions defined for the respective country for further handling.

If the screener becomes aware of a negative post or blog article about BAH or one of the products in a social media channel that does not belong to BAH and which has reached a critical number (*compare below*) of engagement (shares, likes), the communication processes formulated below also apply here.

### Extraordinary event (EE)

Social networks are a public space in which users can express their opinion, interact and ask for comments at any time.

How is an extraordinary event identified? There are no predefined metrics or assessment metrics that give guidance to recognize an extraordinary event on social media. In many cases it is difficult for the screener to anticipate the potential

impact beyond his/her country. Nevertheless there are some factors that can suggest that a comment may expand to an extraordinary event. Each event has to be evaluated by the screener on a single-case basis.

Experience in other Bayer Divisions show that if a critical statement made against the company or a product garners a significant number of shares or likes within a short time span, it can turn into an extraordinary event and action is required. A post that within 24 hours has more than 500 likes or shares has the potential to grow fast and may not be confined to the origin country. However, If the screener is not sure whether a situation is or has the potential to become an extraordinary event, the following principle applies: Better to start the information chain early even if it turns out to be a “false alarm” than risk that a timely intervention of an extraordinary event is no longer possible.

When determining the potential of a post to become an extraordinary event, the screener should also consider the number of followers of the person who posted the critical statement as well as the language.

An extraordinary event, within this Guidance refers to an avalanching occurrence of negative statements on Bayer Animal Health or one of its products in social networks, blogs or comment functions on Internet sites, such as blog posts or comments, tweets or Facebook posts.

Characteristically, these extraordinary events require urgent calls for action, e.g. to prevent the event having an impact in the near future. At the same time, decision-makers may feel threatened, facing rising uncertainty, because they usually have to deal with incomplete, unconfirmed, contradictory, false or falsified information.

In case of doubt about criticality and potential spread of a case, the screener should contact local communications or if necessary send a mail to [social.media@bayer.com](mailto:social.media@bayer.com) (the global social media managers).

## **V. Product-related events**

A product-related extraordinary event refers to a situation in which certain observations or statements regarding the quality and/or safety of a product, either sold directly by Bayer Animal Health or via a third party, have been published in social networks. Such posts may relate to a potential threat for animals, humans and/or the environment and has already attracted attention (locally or globally).

## VI. Information flow and responsibilities

If a product-related extraordinary event is identified in social networks, the applicable functions will be informed and handle the event according to the following process.

### VI.1 Local process

The owner of the social media channel is responsible for monitoring all inbound messages (posts, comments, etc.) at least every working day, and answers have to be given at least within 24 hours.<sup>2</sup> This is stipulated by the Margo on Social Media<sup>3</sup> in order to identify a potential Adverse Event (AE) or potential Product Technical Complaint (PTC) in a timely manner. (See also BAH-RD-SOP#0295). The owner is responsible for comprehensive monitoring of the channel and organizes the responsible team for this activity to ensure continuous monitoring.<sup>4</sup>

If the screener identifies an extraordinary event that includes information on a potential AE or potential PTC, this information is forwarded to Local Communication partner, Local Drug Safety (LDS) or Country Quality Head (CQH), and additional functions as applicable, for further handling. Local PQSC is immediately informed by LDSR or CQH. Depending on whether the identified issue is related to safety or quality, the LDSR or CQH respectively, will take the lead. The relevant functions will then evaluate, steer and monitor identified extraordinary event, consult with the legal department, decide on the appropriate measures to be taken and react quickly. Such events may originate from or be triggered by veterinarians, pharmacists, farmers, pet owners, the media or lawyers. In general local issues are to be handled locally (i.e. driven by local AH representatives, global approved standby statements etc. adapted by local experts.

<sup>2</sup> Every employee of BAH who learns about a potential EE is urged to inform the screener or local communications in his respective country. If he does not know the person or contact details he should send an e-mail to [social.media@bayer.com](mailto:social.media@bayer.com) (the global social media managers).

<sup>3</sup> [Corporate Policy - Social Media Usage at Bayer, Policy No. 2030](#):

<sup>4</sup> If an external service providers is designing, building and managing a social media channel the owner has to ensure that the external partners comply with the social media principles of Bayer: [Margo, Policy No. 2030](#)

If the identified extraordinary event includes information on a potential AE or PTC, the following steps are required.



As the locally identified extraordinary event may have regional or global consequences, the responsible functions at headquarters should also be informed immediately. First contact persons will always be the responsible colleagues of the Global Communications team (*contact list below*). The Global COMs team will immediately inform all relevant departments, e.g. Head of Pharmacovigilance (PV), Qualified Person for Pharmacovigilance (QPPV), Head of Quality Assurance (QA) and the global legal function to enable possible legal steps and/or their co-ordination. Should the post with the extraordinary event continue to spread on the social web 48 hours after the first screening, the following functions will also be informed: Head of Global Veterinary Scientific Affairs (VSA), Head of Marketing or Global Brand Manager (MKTG).

#### **Exception: Local process in the US**

#### **Operational Instruction (OI 2018/01):**

#### **GUIDELINE on handling extraordinary events in social media at Bayer Animal Health – Operational Instruction for local process in the US**



## VI.2 Global process

Whenever the local representatives (screener, local communications) are informed about a negative post in social networks, either through a Bayer employee or a third party, and an extraordinary event is identified, applicable functions in head office should be informed and involved early in the process. In any case, Global Headquarters has to be involved if an extraordinary event has the potential to or did become transnational.

[Contact list: Handling of reports from Social Media containing safety, efficacy and quality information in Bayer Animal Health](#)

In a first joint issues meeting, decisions on next steps and measures to be implemented are taken, taking into account the input of applicable functions, in order to react appropriately to the situation.

For further details on handling of potential AE and potential PTC from social media please refer to SOP: [BAH-RD-SOP#0295 Handling of Potential Adverse Events and Potential Product Technical Complaints from Social Media](#)  
*(Please contact LDS unit or [gppv.bah@bayer.com](mailto:gppv.bah@bayer.com) if access is not possible)*

### VI.2.1 Global Communications: Measures

In a first step, Global Communications coordinates a meeting with an issues response taskforce<sup>5</sup> within 24 hours.

The objective of this meeting is to plan and coordinate measures and support Global Communications by developing a communication concept:

- This can be the provision of an Ad Hoc statement.
- A reactive communication strategy to respond to the event
- Active positioning, e.g. by commenting / rectifying an event

In addition, Global Communications provides a reactive statement [Reactive Statement-Sharepoint](#) with key messages for all key global products that can be adapted for external use. (Note: Country LMR approval required)

No posts and comments should be deleted. It is better to react quickly, within 24 hours. The only exception is a comment that violates applicable law. In the case of fake news, deliberate false alarms or so-called “alternative facts”, the first reaction

<sup>5</sup> Mandatory members of the issues response taskforce are: Head of Pharmacovigilance (PV), Head of Quality Assurance (QA), Manager CAP/ FAP (COM), Head of Marketing or responsible Global Brand Manager (MKTG), Country Head (CH), Head of Global Veterinary Scientific Affairs (VSA), Global legal function.

attempted must be to mark this as fake news. To this end, the local Legal Department must be involved at an early stage in order to check possible relevant legal steps.

For Facebook posts that violate or infringe trademarks, copyrights, and/or community standards, a report can be made via the link below

<https://www.facebook.com/help/contact/208282075858952>

The reporting to Facebook must be done by the local Legal Department. For infringements, mandatory and verifiable evidence must be presented in written form, which is then validated by Facebook:

### **VI.2.2 Further Steps**

1. The Global Communications team informs the responsible Global Brand Manager
2. Ongoing monitoring of the situation (i.e. further development of the post) through the country Communications Manager
3. Weekly update of issues response taskforce.
4. Joint decision on when the extraordinary event can be considered as concluded
5. Final reporting to all members of the issues response taskforce: summary of all facts (figures on dissemination of the EE), as well as the measures applied by BAH and the outcomes