

PHARMACEUTICAL
ADVERTISING
ADVISORY BOARD

STRATEGIC PLAN

2020–2022





Message from the Board

The changing global market makes this an exciting time for PAAB to refine the way we work. With our strong 40-year history as an independent review agency, we are proud of how we support an advertising environment for healthcare products that helps safeguard the health and safety of Canadians. Since our last strategic plan, we are especially proud of the relationships we have fostered to strengthen our ability to identify and address key issues.

When we came together as a Board to develop our strategy for 2020–2022, there was a common thread throughout our discussion: We operate as part of a larger system and that system only serves Canadians if we are all committed to continuous improvement. In today's operating environment, that means collaborating more effectively with all stakeholders.

Industry continues to face significant challenges. Our healthcare professionals are under increasing pressure to care for an

aging population, and Canadians' appetite for information about health products is insatiable. Our regulatory system is under intense scrutiny, and trust in pharmaceutical companies remains low. Industry has enormous responsibility to provide credible information while meeting market demands and global regulatory requirements.

Against that backdrop, we believe that PAAB has a vital role to play in supporting truthful and trustworthy healthcare product advertising. We have leveraged our awareness of industry's needs to shape our strategic priorities, and we look forward to working with all stakeholders in the system, including healthcare professionals, industry, and regulatory stakeholders, to strengthen our system so that it delivers what all Canadians deserve: truthful and trustworthy healthcare product advertising that promotes the health and safety of Canadians.



Introduction

The Pharmaceutical Advertising Advisory Board (PAAB) is an independent and not-for-profit review agency funded on a fee-for-service basis. It is the only agency whose preclearance service for advertising directed to healthcare professionals is recognized by Health Canada.

Throughout our 40-year history, our external operating environment and the forces impacting industry have evolved significantly. PAAB has adjusted in tandem. Looking ahead, we know that more change is coming. Consistent with what we identified during our last planning cycle, PAAB must stay attuned to the issues that affect how products are developed and advertised, including market forces and regulatory pressures that shape industry's needs.

The way products are developed and sold is changing. As new technologies gain traction, the speed of change will only increase. Health Canada's review standards are shifting. Globalization continues to influence the way pharmaceutical companies operate and their needs are also evolving.

As an organization, PAAB is also changing, with new leadership and new representatives on the Board. This makes this Strategic Plan a prime opportunity to make thoughtful choices about how we move forward together in this environment.

To remain relevant and sustainable, PAAB needs to show stakeholders how we are adapting and demonstrate why our work matters now more than ever. Over the next three years, PAAB will enhance how we communicate the value of our work, and we will collaborate with stakeholders to strengthen the system that we believe is the heart of truthful and trustworthy advertising.

With four carefully chosen and mutually supporting goals, this strategy will help PAAB identify and adapt to new challenges while remaining focused on providing high quality service and demonstrating value to all stakeholders.

Our Vision and Mission

PAAB plays a vital role in a bigger system of stakeholders who make unique contributions to healthcare product advertising. Industry advertising increases awareness of health product treatment options. Truthful and trustworthy advertising helps to support better decision making by healthcare professionals and patients.

Within this system, PAAB's mandate is to ensure that the advertising and promotional system for healthcare products meets the regulatory, scientific, therapeutic, and ethical standards outlined in the Code of Advertising Acceptance. Our vision and mission shape the way we carry out this work.

VISION

Truthful and trustworthy healthcare product advertising
that promotes the health and safety of Canadians.

MISSION

The Pharmaceutical Advertising Advisory Board provides independent preclearance and advisory services that enable healthcare product advertising to comply with the Canadian regulatory framework.

OUR VALUES

PAAB's values guide our day-to-day actions and decisions. While internal and external forces may cause us to adjust our priorities, our values reflect the approach we take in all our work. We are proud that our work reflects the following values:

Integrity

Competency

Credibility

Independence

Excellence

Transparency

These elements provide the foundation for this Strategic Plan for 2020–2022.

PAAB 2020-2022 Strategic Goals

Objective 1.1: Promote PAAB's value in helping industry develop truthful advertising.

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Objective 1.2: Increase awareness among healthcare professionals about PAAB's role in supporting truthful and trustworthy advertising.

STRATEGIC GOAL 1

PAAB's value proposition is well-understood.

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Objective 2.1: Improve stakeholders' understanding of how the Code helps advertisers comply with Canadian regulatory requirements.

Objective 2.2: Enhance industry's capacity to apply the Code and understand the value of preclearance in helping them meet their regulatory obligations.

STRATEGIC GOAL 2
The Code of Advertising Acceptance is recognized as a valuable tool.

Objective 3.1: Enhance collaboration on relevant issues to improve the relevance of healthcare product advertising.

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Objective 3.2: Increase and improve monitoring activities in collaboration with Health Canada.

Objective 3.3: Address emerging issues in the market and collaborate with stakeholders in areas where PAAB should be active.

STRATEGIC GOAL 3

Stakeholders collaborate to drive continuous system-wide improvements.

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Objective 4.1: Implement modern tools to support excellence in service delivery.

Objective 4.2: Empower staff to thrive with an emphasis on high-quality training and professional development in a positive workplace culture.

STRATEGIC GOAL 4

PAAB is a sustainable organization that effectively manages its resources.

Strategic Goals

The PAAB Board has established four interconnected and mutually supporting strategic goals and related objectives to help us carry out our mission and mandate. Our goals represent our key priority areas over the next planning horizon. The objectives represent a path to help us achieve each goal.

Together, these goals and objectives aim to strengthen PAAB's connection with the key constituencies we serve: industry stakeholders who come to PAAB for high quality service, as well as healthcare professionals, patients, and consumers who receive healthcare product advertising and information.

We are committed to ensuring that PAAB provides continuing value to our clients today and into the future.

Strategic Goal 1: PAAB's value proposition is well-understood.

As an independent review agency, PAAB is one part of the larger healthcare product advertising system, which is founded on a model of voluntary compliance that allows industry and the regulator to work more efficiently. The system can only be credible and effective if stakeholders recognize and appreciate the role that others play. Increasing awareness of PAAB's value proposition underpins several activities in this strategy.

OBJECTIVE 1.1: Promote PAAB's value in helping industry develop truthful advertising.

Truthful and trustworthy advertising of health products benefits all stakeholders, from the manufacturers who develop products to the patients who use them. There is a continuing need to promote awareness among industry stakeholders about how PAAB contributes to this landscape.

PAAB's strategic value to industry comes from our expertise in helping advertisers comply with federal regulatory requirements for healthcare product advertising. Data demonstrates that complaints received by Health Canada about advertising to healthcare professionals have consistently been related to material that was not precleared by PAAB. Having advertisements precleared through PAAB's review process may significantly reduce the risk that companies will face complaints and the associated penalties that can be levied by Health Canada. Regulatory compliance can also decrease legal risk for industry and improve industry's credibility with their target audiences and the Canadian public.

Promoting PAAB's value to industry will encourage more companies to consistently use PAAB's services, particularly as industry faces increasing risk and cost pressures in a competitive global market.

OBJECTIVE 1.2: Increase awareness among healthcare professionals about PAAB's role in supporting truthful and trustworthy advertising.

Healthcare professionals make up 75 per cent of the target audience for material that is reviewed by PAAB, but awareness of PAAB in the healthcare sector remains low. Not all healthcare providers are aware of the rules that govern advertising, and some stakeholders, including many physicians and pharmacists, mistakenly believe that the government approves all advertisements.

PAAB can contribute to the health and safety of Canadians by increasing awareness among healthcare professionals about the regulatory requirements for healthcare product advertising and the critical role PAAB plays in helping industry meet their obligations. PAAB's clearance process can also help healthcare professionals work more effectively by helping them quickly recognize credible information and reducing their need to research industry's claims themselves. PAAB's ultimate objective is that healthcare professionals look for the PAAB logo as a sign that advertising material is truthful and trustworthy.

Strategic Goal 2: The Code of Advertising Acceptance is recognized as a valuable tool.

PAAB developed and regularly updates the Code of Advertising Acceptance (the Code) in collaboration with industry, healthcare professionals, and patient groups. Health Canada reviews each iteration of the Code prior to PAAB Board approval. PAAB's central role in creating, updating, and applying the Code makes PAAB the foremost authority on all aspects of the Code.

PAAB will leverage this experience and expertise in its training and communications activities, with a view to being recognized as the most credible voice on the spirit, requirements, and application of the Code.

OBJECTIVE 2.1: Improve stakeholders' understanding of how the Code helps advertisers comply with Canadian regulatory requirements.

The Code sets standards for high quality, truthful and trustworthy advertising that is aligned with regulatory requirements. As the architect of the Code and its evolution, PAAB is uniquely positioned to share knowledge that demonstrates the Code's value and purpose.

PAAB will communicate with stakeholders to increase understanding of the Code and its role in helping advertisers comply with Canadian regulatory requirements. We will leverage staff expertise and key performance metrics to clearly describe PAAB's success stories. Promoting the Code as an effective tool will help position PAAB as the leading authority on truthful and trustworthy advertising.

OBJECTIVE 2.2: Enhance industry's capacity to apply the Code and understand the value of preclearance in helping them meet their regulatory obligations.

PAAB's training workshops are already highly rated by participants for the practical value they provide in helping industry understand the Code, the preclearance process, and their relationship to Canadian regulatory requirements. PAAB will continue to elevate the quality of its training to ensure that participants learn what is in the Code and that they are well-equipped to consistently apply it to develop truthful, high-quality healthcare product advertisements that comply with Canadian regulations.

The more industry understands the Code and the value of preclearance, the more likely it is that companies will participate in the preclearance process, including new players entering the market, small companies with little regulatory experience, and existing companies entering new product areas. Increasing awareness of the Code will also help companies improve the quality of submissions they send to PAAB.

Strategic Goal 3: Stakeholders collaborate to drive continuous system-wide improvements.

With 40 years of history, PAAB has accumulated extensive knowledge about healthcare product advertising that could be better leveraged to support the regulatory environment, both upstream and downstream of PAAB's operations. Driving continuous improvement is essential to maintain and enhance the credibility of the system as a whole.

As an independent agency, PAAB is uniquely positioned to provide objective observations on how to make the system more efficient and effective. PAAB is committed to working more closely with Health Canada and other stakeholders to share observations and lessons learned that could drive innovation and more effectively support truthful and trustworthy advertising.

OBJECTIVE 3.1: Enhance collaboration on relevant issues to improve the relevance of healthcare product advertising.

PAAB has a deep understanding of the relationship between the information generated as part of its regulatory process (e.g., product monographs) and the advertising material created by pharmaceutical companies. Through their regular dialogue with industry, PAAB staff are also familiar with the key pain points in industry.

PAAB will identify opportunities to collaborate and share evidence-based insights with Health Canada, as well as identify ways to improve the effectiveness of advertising to healthcare professionals. Improving the system provides further incentive to industry to participate on a voluntary basis, which benefits all stakeholders and the Canadian public.

OBJECTIVE 3.2: Increase and improve monitoring activities in collaboration with Health Canada.

With their depth of experience, PAAB staff can easily recognize common issues in advertising submissions, as well as problems in advertising that has not been precleared by PAAB. These insights would be valuable to Health Canada, which retains the authority for regulatory enforcement. PAAB will identify opportunities to share relevant data that supports Health Canada's ability to provide effective regulatory oversight, improve compliance, and strengthen the credibility of the system. PAAB will also work with external stakeholders to better understand and raise awareness of compliance and regulatory issues faced by industry and regulators in Canada and other jurisdictions.

OBJECTIVE 3.3: Address emerging issues in the market and collaborate with stakeholders in areas where PAAB should be active.

PAAB's long-term sustainability is deeply connected to our ability to forecast trends and seize opportunities to innovate. To keep pace with industry, PAAB needs to proactively identify issues and take measures to learn about them before companies begin seeking preclearance approval for their advertising. As new product areas emerge, PAAB must be prepared to assess whether and how they fit into PAAB's review framework. PAAB will monitor and assess factors that affect industry domestically and internationally, build awareness among stakeholders, and identify new opportunities. This will help ensure that the system remains nimble and efficient.

Strategic Goal 4: PAAB is a sustainable organization that effectively manages its resources.

PAAB's role as an independent and self-financed review agency is unique in the Canadian regulatory context. We are proud of our team's consistent ability to meet the highest standards of service delivery in a complex environment with many stakeholders. To maintain our long-term sustainability, we must continue to invest in the people, processes, and tools that allow us to innovate.

PAAB is committed to demonstrating continuous improvement in how we do business and creating an environment that empowers our staff to be successful. This will help position PAAB as a model organization for other independent review agencies operating in a regulatory environment.

OBJECTIVE 4.1: Implement modern tools to support excellence in service delivery.

As our stakeholders' needs change, PAAB has an ongoing duty to manage our resources effectively and to ensure that our operations keep pace. We will ensure that we have up-to-date information management systems, modern governance procedures, and effective planning processes to guide our work, as well as key performance indicators and metrics to demonstrate our progress.

OBJECTIVE 4.2: Empower staff to thrive with an emphasis on high-quality training and professional development in a positive workplace culture.

Our staff are what make PAAB successful. While PAAB has typically enjoyed high rates of staff retention, we must continue to ensure that staff feel valued and that they have the support they need. PAAB is committed to providing its employees access to training and development opportunities and to achieving a staff complement that allows us to effectively manage workloads.

Conclusion

As government and industry face increasing pressure to meet growing expectations, PAAB occupies a special place in the advertising landscape. We see this as a tremendous responsibility and opportunity. Even as that landscape changes, this plan will help us rise to the occasion with the agility and creativity that we need, without losing sight of why we exist — to play our part in supporting truthful and trustworthy healthcare product advertising that promotes the health and safety of Canadians.

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