AANA

BEST PRACTICE GUIDELINE – RESPONSIBLE MARKETING COMMUNICATIONS IN THE DIGITAL SPACE

INTRODUCTION

This Guideline is a best practice guide for brand owners, their agencies and the community in understanding the application of the AANA self-regulatory Codes in the digital space.

For simplicity, in this Guideline, the term "digital marketing" is used to refer to advertising or marketing communications in a digital environment.

1. DEFINITIONS

For simplicity, in this Guideline:

– The term "digital marcomms" is used to refer to advertising or marketing communications in a digital environment;

– The term "User Generated Content (UGC)" is used to refer to material which has not been created by the brand owner or their agent but by another person interacting on the brand owner's digital marketing site or platform;

– Reasonable Control – a brand owner has reasonable control of user generated content when it becomes aware of the material. A brand owner becomes aware of material when:

• it has posted or published material;

• it becomes aware of UGC through reasonable review;

• a user notifies the advertiser/marketer of the UGC; or

• a complaint is lodged with the ASB about the UGC.

– Only UGC within the reasonable control of the brand owner is subject to the self-regulatory codes.

2. WHAT DOES THIS GUIDELINE APPLY TO?

a. Material, including UGC, which draws the attention of the public in a manner calculated to promote or oppose directly or indirectly a product, service, person, organisation or line of conduct and which is:

– Under the reasonable control of the brand owner;

– Has an Australian-customer link (ie if any or all of the customers of the product, service etc are physically present in Australia);

– Is communicated via a site or digital platform, or part thereof, which is under the control of an Australian company.

b. Examples of digital marcomms include, but are not limited to:

– Social networking (e.g. Facebook, LinkedIn, MySpace);

– Social news sites (e.g. Reddit);

– Video sharing (e.g. YouTube, Vimeo);

– Wikis (e.g. Wikipedia, PBwiki);

– Applications (e.g. Mobile and web based applications);

– Blogs and microblogs (eg Twitter);

– Brand websites (including mobile and tablet versions);

– Instant messaging;

– Livecasting;

– Online/banner advertising;

– Online gaming;

– Photo sharing (e.g. Flickr, Instagram);

– Pinterest;

– Podcasts;

– RSS feeds.

3. WHAT IS EXCLUDED?

a. This Guideline does not apply to material, including UGC, posted on digital sites or platforms over which the brand owner does not have reasonable control even if brands or products of the brand owner are featured. Examples are:

– a user posting a brand's TVC on YouTube with additional footage/comments;

– a user posting footage on YouTube using a brand or product but with no involvement from, or encouragement by, the brand owner;

– UGC featuring hashtags that may relate to a brand or brand campaign from platforms such as Twitter and Instagram;

– A tweet from a brand re-tweeted with added content by a user, over which the advertiser/marketer has no control;

– UGCs that are reposted by a person other than the brand owner.

4. MANAGING CONSUMER INTERACTIONS

This section provides some best practice guidance to assist brands in managing how consumers interact with them and with each other in the digital space.

Many digital platforms provide functionality and mechanisms for brands to define and manage the way consumers interact with them and with each other. Brands are encouraged to familiarise themselves with the functionality available when establishing their digital presence.

For example, in the case of Facebook, AANA recommends the following best practice steps:

– Notifications management: An email notification is sent to a nominated email address when a customer posts, comments or sends a message to a brand owner's page;

– Permissions management:

  • Allows a brand owner's page to be viewed only in those countries in which the brand is marketed;

  • Where appropriate, age groups should be restricted from viewing the brand owner's page;

– Brand owners should consider using tools to review UGC via mobile/tablet application or otherwise (for example, Facebook has a Pages Manager mobile application);

– Profanity block list: can be set to strong, medium or none. Brand owners should be guided by their consumers, the level of brand activity and the conversations on the brand owner's page in setting the appropriate profanity filter.

Other platforms provide similar functionality.

5. HOW SHOULD UGC BE MODERATED?

UGC should be moderated by the brand owner once it becomes aware of the UGC and it remains on the digital site or platform.

What is considered reasonable review of UGC will differ by brand owner and brand, based on the digital platform, expectations of the relevant digital community, and level of activity on the digital platform.

The below provides guidance on 'best practice' for the review of UGC, which can be tailored to the specific company/brand/channel. To the second moderation is not required.

– Moderation may include, but is not limited to, the removal or correction of UGC;

– Guidelines or "house rules" should be developed and be accessible to registered users. "House rules" should clearly define what is and isn't acceptable UGC;

– Pre-vetting of UGC is not required (although brand owners may find language profanity filters useful);

– Brand owners should consider moderating immediately after posting digital marcomms and for at least two hours following the post depending on the context of the posted digital marcomms and the expectations of the relevant digital community;

– At all other times, brand owners should consider moderating at least once every business day;

– On non-business days, brand owners should consider moderating in a manner consistent with the brand's level of activity and level of consumer engagement;

– During periods of increased engagement (by the brand owner or by users), brand owners should consider increasing their level of moderation;

– Where possible, brand owners should make available a mechanism to allow users to notify the brand owner of any UGC they consider is unacceptable (such as a button "report inappropriate content", "alert administrator" or "contact us");

– Where possible, brand owners should consider using automated software to remove UGC which offends prevailing community standards.

Brand owners should refer to the AANA Code of Ethics Practice Note for guidance on community standards.

If a complaint about UGC is received by the Advertising Standards Bureau, the brand owner should review the UGC against the community standards guidance in the AANA Code of Ethics Practice Note. The brand owner should consider the following action:

– The brand owner may consider correcting or removing the UGC and/or other parts of the conversation following the receipt of the complaint. Only the "offending" UGC should be corrected or removed;

– Where appropriate, the brand owner may consider notifying the user of the complaint and the brand owner's decision to correct or remove the UGC as a result of a breach of the house rules;

– Removal of the entire conversation or the brand owner's entire page (for example in Facebook) is not required.

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