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. **What does this Guideline apply to?**

   a. Material 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 marketer;
   - Has an Australian-customer link (i.e. 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;
   - User generated content which is communicated via a digital site or platform over which the marketer has a reasonable degree of control.

   b. Examples of digital marketing 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
   - Mobile Communications and Messaging (e.g. advertising on mobile devices, SMS, MMS)
   - Online/banner advertising
   - Online gaming
   - Photo sharing (e.g. Flickr, Instagram)
   - Pinterest

- Podcasts
- Proximity marketing
- QR codes
- Relationship marketing (e.g. consumer email outreach)
- RSS feeds
- Search engine marketing and optimisation

2. What is excluded?

a. This Guideline does not apply to material outside the reasonable control of the brand owner. User generated content (UGC) on pages and sites which are not within a marketer's reasonable control, and/or which has not been solicited by the brand owner, even if brands or products are featured, are excluded. 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

3. 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's page;

- Permissions management:
  - Allows a brand'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's page

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

Other platforms provide similar functionality.

4. **What is User Generated Content?**

   User Generated Content (UGC) is 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 platform. User generated content can take the following forms:

   - UGC which was solicited by the brand
   - UGC which was not solicited by the brand but over which the brand has reasonable control

5. **How should UGC be moderated?**

   The moderation of user generated content will differ by marketer 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', which can then be tailored to the specific company/brand/channel.

   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 advertisers may find language profanity filters useful). To the second moderating or take down is not required.

   Brand owners who are interacting and participating actively on a digital platform, should consider the following in formulating a best practice moderation policy for reviewing UGC which has been posted:

   - Brands should moderate immediately after posting or engaging and for at least two hours following the post
   - At all other times, moderation at least once every business day
   - On non-business days, moderation should be determined in a manner consistent with the brand's level of activity and level of consumer engagement
   - During periods of increased engagement, brands should consider increasing their level of moderation
   - Advertisers are encouraged to monitor spikes in traffic on digital marketing platforms or any existing community sentiment intel to make decisions about further moderating or review
   - Brands should encourage all members of their marketing teams to monitor user activity via mobile/tablet application or otherwise (for example, Facebook has a Pages Manager mobile application)
   - Where possible, a mechanism should be available to provide users with an opportunity to notify the brand of any content they consider is unacceptable (such as a button "report inappropriate content", "alert administrator" or "contact us")
   - Where possible automated software should be used to remove inappropriate comments which offends prevailing community standards

   Brands 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 the removal of the UGC and/or other parts of the conversation following the receipt of the complaint. Only the "offending" UGC should be removed
- Where appropriate, brands may consider notifying the user of the complaint and the brands decision to remove the comment as a result of a breach of the house rules.

Removal of the entire conversation or the brands entire page (for example in Facebook) is not required.