



Best Practice for Responsible Digital Alcohol Marketing

Introduction

The ABAC Responsible Alcohol Marketing Code (the Code) sets high standards for alcohol marketing including digital marketing/social media.

Digital Marketing means advertising through digital platforms, tools and technologies including Applications, Blogs, Brand Websites, Instant Messaging, Livecasting, Microblogs, Mobile Communications and Messaging, Online/banner advertising, Online gaming, Photo sharing, Podcasts, Proximity marketing, QR Codes, Relationship marketing, RSS Feeds, Search engine marketing and optimisation, social channels (e.g. Instagram, Pinterest, Reddit, Facebook, Snapchat), user generated content, video sharing (eg Periscope, YouTube, Vimeo), and Wikis.

ABAC has developed this best practice guide to assist the alcohol industry in maintaining high standards of social responsibility in the management of digital alcohol marketing.

This guide is non-binding and is not intended to replace or extend the provisions of the Code. Rather, it is intended as guidance to assist advertisers and agencies.

It is recognised that digital marketing is evolving rapidly and therefore the best practice guide will be reviewed on a regular basis and updated where necessary.

Interaction with other Regulation

1. All digital marketing must comply with the ABAC Responsible Alcohol Marketing Code and the Australian Association of National Advertisers Code of Ethics.
2. All digital marketing must comply with guidelines for digital marketing published by the Australian Association of National Advertisers and the Communications Council.
3. All digital marketing must respect user privacy and laws governing the collection of personal information.
4. All digital marketing must comply with all other relevant laws in Australia.

Responsible drinking message

5. All websites and social media pages controlled by alcohol beverage advertisers should include a responsible drinking message. Advertisers should also identify to users an appropriate responsible drinking website e.g. Drinkwise.

Age Affirmation

Age affirmation is a process by which users provide their full date of birth and country of access to affirm they are of legal purchase age.

6. **Age Restriction, Targeting or Affirmation Technologies** should be used, where available, for all digital marketing controlled by alcohol beverage advertisers, to restrict access to users of legal purchase age or over. These technologies rely on users registering with their correct date of birth and registered adults not sharing devices with minors. A decision by users to register with an incorrect date of birth or share devices is outside the control of advertisers and advertisers can not then be responsible for consequent exposure of users under the legal purchase age to alcohol marketing.

Examples of how to use these techniques to meet best practice include:

- **Direct Marketing Communications** directed to a specific person, for example e-mail and SMS, should only be directed to consumers who have provided an age affirmation that they are of legal purchase age or over. A reliable age affirmation mechanism should be used.
- **Download Advice, Forwarding Notices, Responsible Drinking Messages or Age Affirmation mechanisms** should, where possible, be included on all digital marketing communications that are intended to be shared, such as with a 'share', 'download' or 'email' option.

Download Advice and Forwarding Notices are instructions to individuals forwarding or downloading the content that they should not forward the material to individuals below the legal purchase age.

- **Website Age Gates** (website landing pages that require visitors to confirm they are of legal purchase age before they can enter a website) should be used on all websites controlled by alcohol beverage advertisers.

It is recommended that the following age affirmation measures be adopted:

- Users should be required to input their date of birth and country of access to affirm they are of legal purchase age (for example from a drop down menu) rather than being allowed access through clicking a default option.
- If a user enters a birth date that equates to being under legal purchase age they should be given an appropriate alcohol social responsibility message, or redirected to an appropriate responsible drinking website.
- Repeat users may be invited to set up a "remember me" option but the invitation should warn on the appropriateness of this option if the computer may be used by someone under the legal purchase age.
- Users that have affirmed their age on a site may access a related site for that company without being required to re-affirm their age.

- Corporate websites with a primary purpose of communicating company information do not require an age affirmation page.
- Digital marketing communications on social channels should activate all available **age restriction controls** to restrict access to users of legal purchase age or over (e.g. Facebook, Twitter, YouTube).
- Digital marketing communications on a site or page controlled by the brand advertiser that involve **direct interaction with a user** should require age affirmation by the user prior to full user engagement of that communication to determine that the user is of legal purchase age or over.

Direct interaction is a two-way communication between the user and the advertiser on a site or web page controlled by the advertiser.

- A **Nanny Tag** should be placed on all websites controlled by alcohol beverage advertisers. A Nanny Tag describes the site's content in a format that parental control software detects.
7. **Proximity Marketing** should only be used in situations where people will be of legal purchase age or over, for example, in age restricted venues such as nightclubs or when directed to users who have been verified as legal purchase age or over.

Proximity marketing is a digital communication directed to recipients in a particular proximity via SMS or MMS.

8. **Digital marketing communications should only be placed** in media where at least 75% of the audience is reasonably expected to be of legal purchase age or over and should use **Pre-bid Audience Verification Tools** that specify an adult audience. Pre-bid Audience Verification Tools are real time monitoring to verify that a URL is safe for a customer according to a defined and individually specified criteria and to ensure an advertisement is consistently only displayed in a suitable environment.
9. **Downloadable applications** should only be made available where at least 75% of the audience is reasonably expected to be of legal purchase age or over.

User Generated Content

User generated content (UGC) is material that has not been created by or for a brand owner but by a person interacting on the digital platform.

10. **UGC** within digital platforms, controlled by an alcohol beverage advertiser (including UGC shared or endorsed by an alcohol beverage advertiser) is within the scope of the ABAC.
11. To contribute UGC a user must affirm by their date of birth that they are legal purchase age or over.
12. Where practicable, house rules should be accessible to registered users and clearly set out what is and isn't acceptable UGC. Annexure A is a sample set of House Rules that cover the ABAC standards, which should be adapted into the style / voice of the brand to encourage uptake.
13. Where possible, a mechanism should be available to provide users with an opportunity to notify the advertiser of any content they consider is unacceptable (such as "report inappropriate content" links, "alert administrator" buttons or the provision of contact details).

14. **Moderation** of UGC within a digital platform, controlled by alcohol beverage advertisers, should be carried out by either pre-moderation or post moderation.

- Pre-moderation is where UGC is approved before it appears on brand controlled digital platforms.
 - Where possible, automated software should be used to identify and remove inappropriate content.
- Post-moderation is where UGC is checked by an alcohol advertiser after it appears and is removed if considered to be in breach of the ABAC Code or the AANA Code of Ethics.

If post moderation is used the following measures should be taken:

- Where possible, automated software should be used for identifying and removing inappropriate content.
- The site should be moderated at least once every business day and also on non-business days if the brand undertakes activity on the site during those non-business days.
- The site should be moderated immediately after the brand posts or engages and for at least two hours following the post.

Digital Influencers

A Digital Influencer (Influencer) is an individual who has influence (trust and reach) over their followers and uses digital platforms including social media channels (e.g. Facebook, Instagram, Pinterest, Blog, Website etc) to reach potential buyers of goods and services.

15. Where a brand enters into an arrangement with an **Influencer** (direct or via a third party) in relation to the promotion of a brand, product, service or program (e.g. loyalty program), the promotion is an alcohol marketing communication and must meet the standards in the Code.

16. An **Influencer** promoting an alcohol brand should meet the following criteria:

- 25 years of age or older.
- Social following with an audience demographic of at least 75% adults at the time of the promotion (where such data is available)
- No known history of alcohol abuse or irresponsible behaviour related to alcohol use.
- No known history of publishing content that would not meet the Code standards.

17. An **Influencer** promoting an alcohol brand should be required to:

- Where available, apply age restriction controls or an age gate to content promoting an alcohol brand.
- Undertake to meet the Code standards within the content promoting the brand.
- Disclose that the content is a marketing communication.
- Undertake to remove any content the ABAC Adjudication Panel finds breaches the Code.

For more information please contact the ABAC Administrator at info@abac.org.au

Annexure A – Sample User Generated Content House Rules

[This sample set of House Rules address compliance with the ABAC Responsible Alcohol Marketing Code only. A company may expand its guidelines to address other issues, including legal obligations and other relevant codes of practice and use its own language designed to encourage users to engage with the House Rules.]

All content on our website, including content posted by users of the site, must comply with the ABAC Responsible Alcohol Marketing Code to ensure all our marketing communications are socially responsible. Accordingly all content posted by users of this site must comply with the following rules. Any content that does not comply with the Rules will be removed and may result in de-registration from this site.

- It must not encourage the excessive or rapid consumption of an alcohol beverage, misuse or abuse of an alcohol beverage or consumption inconsistent with the Australian Alcohol Guidelines
- It must not encourage irresponsible or offensive behaviour that is related to the consumption or presence of an alcohol beverage
- It must not challenge or dare people to consume an alcohol beverage
- It must not encourage the choice of a particular alcohol beverage by emphasising its alcohol strength or intoxicating effect
- It must not have strong or evident appeal to minors
- It must not show minors unless they are shown incidentally in a natural situation where there is no implication they will consume or serve alcohol
- It must not show visually prominent 18-24 year olds ***[Note: if these house rules are within an age restricted environment as defined in the Code this rule can be removed]***
- It must not suggest that the consumption or presence of alcohol beverages can change a mood or environment;
- It must not show the consumption or presence of alcohol beverages as leading to personal, business, social, sporting, sexual or other success;
- It must not imply or suggest that an alcohol beverage shown as part of a celebration was a cause of the success or achievement;
- It must not suggest that the consumption of alcohol beverages offers any therapeutic benefit or is a necessary aid to relaxation;
- It must not show the consumption of alcohol beverages before or during any activity that for safety reasons requires a you to be alert or physically co-ordinated, such as the control of a motor vehicle, boat or machinery or swimming;