

# Recall consumer communications package

Conducting a consumer product safety recall – Appendix 3

April 2023

### Acknowledgment of country

The ACCC acknowledges the traditional owners and custodians of Country throughout Australia and recognises their continuing connection to the land, sea and community. We pay our respects to them and their cultures; and to their Elders past, present and future.

Australian Competition and Consumer Commission Ngunnawal

23 Marcus Clarke Street, Canberra, Australian Capital Territory, 2601

© Commonwealth of Australia 2023

This work is copyright. In addition to any use permitted under the *Copyright Act 1968*, all material contained within this work is provided under a Creative Commons Attribution 4.0 Australia licence, with the exception of:

- the Commonwealth Coat of Arms
- the ACCC and AER logos
- any illustration, diagram, photograph or graphic over which the Australian Competition and Consumer Commission does not hold copyright, but which may be part of or contained within this publication.

The details of the relevant licence conditions are available on the Creative Commons website, as is the full legal code for the CC BY 4.0 AU licence. Requests and inquiries concerning reproduction and rights should be addressed to the Director, Corporate Communications, ACCC, GPO Box 3131, Canberra ACT 2601.

### Important notice

The information in this publication is for general guidance only. It does not constitute legal or other professional advice, and should not be relied on as a statement of the law in any jurisdiction. Because it is intended only as a general guide, it may contain generalisations. You should obtain professional advice if you have any specific concern.

The ACCC has made every reasonable effort to provide current and accurate information, but it does not make any guarantees regarding the accuracy, currency or completeness of that information.

Parties who wish to re-publish or otherwise use the information in this publication must check this information for currency and accuracy prior to publication. This should be done prior to each publication edition, as ACCC guidance and relevant transitional legislation frequently change. Any queries parties have should be addressed to the Director, Corporate Communications, ACCC, GPO Box 3131, Canberra ACT 2601.

ACCC 04/23\_21-82

www.accc.gov.au

# Contents

Recall consumer communications package	1
Sample messages you can use in your communications	1
Email/letter	4
In store advertising poster	5
SMS	6
Social media message	6
Make all your recall messages accessible	6
Using QR codes	6
Tools	6

# Recall consumer communications package

# Sample messages you can use in your communications

Remember: always use the words that were agreed to from your recall notice to describe the defect, hazard and remedy.

Important: Describe the maximum potential hazard and potential risk. Even when there is a relatively small risk of a fatality, you must communicate the risk of death in your recall communications.

Select the most suitable and add an image of your product.

## For known consumers

• Our records show that you purchased the product in [Month Year (e.g. June 2020)].

# Ask consumers to check if they own the recalled product

- Do you own this product?
- Do you have a [brand] baby capsule in the backseat of your car?
- Do you have a [product] in your kitchen cupboard?
- Do you use a [brand/store] [appliance] to make dinner?
- Does your child sleep in a [brand] cot?
- Have you purchased a [product] from [store]?
- Do you have a product like this in your home?
- Check your garage/garden shed for [product].

# For consumer goods that have caused death or injury

- This product has been known to kill or injure people.
- This product has caused injuries to people.
- This product has injured a person.
- This product has been known to kill a person.
- The defect has occurred and caused injuries to [number] of consumers.

## **Call to action statements**

- Stop using the [product] immediately and return to the place of purchase for a full refund.
- Unplug your [product] and return it to your closest [store name] for a full refund. No receipt needed.
- **Stop using the [product]** and follow the link below to contact us. We'll arrange for a technician to come to you to fix the defect.
- Remove [product] from your child's toy box and return it to us for a replacement [product].
- Visit our store and we'll fix the issue for you on the spot. No bookings necessary

# Example follow up messages – add to recall messages after initial message

- Since the start of the recall, we have given refunds to over [insert amount] consumers. If you
  haven't returned your product yet, you or someone you know are at risk of [death or a serious
  injury]. Return your product to us and we will give you a full refund.
- Since the start of the recall, we have given refunds to **[insert amount]** consumers. If you are unable to return the **[product]** to us, call or email us to arrange another way.
- We sent you information about a recalled product you may still have in your home but we haven't heard from you yet. (For comms sent to known consumers.)
- So far, we have given refunds totalling **\$[amount]** to our consumers. Check if you own this product and return it to us so we can give you a refund.
- The defect has occurred and caused injuries to [number] of consumers.
- People are more likely to respond if they know the majority of others are too. Only use the below messages where a significant majority of consumers have responded.
- We have recalled a total of **[insert number]** products. Since the start of the recall, we have given replacement products to over **[insert number]** consumers.
- XX% of consumers have already claimed their refund on the recalled **[product]**. Return yours so you too can claim your refund. (For comms sent to known consumers.)

# Messages to avoid

Do not use words or phrases in any of your communications that downplay the risk to consumers.

Examples of words and phrases that downplay the risk and should not be used include:

- Precautionary
- We are recalling this product for precautionary reasons
- Voluntary
- This is a voluntary recall

- Out of an abundance of caution
- It is highly unlikely the defect will occur
- The chance of injury or death is low or rare
- It is unlikely that an incident will occur
- In the unlikely event
- Low risk
- In rare circumstances/occasions
- Isolated incidents
- Extremely rare cases
- No injuries in Australia have been reported
- No injuries have occurred
- Thermal event
- Hot smoke
- Secondary impact.

# Email/letter

Subject: Product safety recall - [insert product name] [PRA No. XX/XXXX]

Dear [consumer's name]



# **Product Safety Recall**

Do you own this product? (or) Our records show that you purchased this product in [Month Year].

Product name

Product identifiers (barcode, model number)

Purchased from: [Stores where product was sold]

Dates sold



the defect if available in

symbol]

Why we are recalling the product

[insert defect information here here]

Hazard: [insert hazard information here]

You are at risk of [death or injury] if you continue to use this product OR

Your child is at risk of [death or injury] if they continue [play with / use] this product.



1. [insert call to action statement]

Contact us if you are unable to return the product or have sold it to another person.



[www.website.com/recall]

[email@email.com]

(0X) XXXX XXXX Xam to Xpm Monday to Friday



Contact the Translating and Interpreting Service (TIS).

131 450 or visit tisnational.gov.au to book a phone interpreter and provide our phone number  ${\bf 0X~XXXX~XXXX}$ 



If you have a hearing or speech impairment- contact us through the National Relay Service

 $1800\ 555\ 660$  and ask for  $0X\ XXXX\ XXXX$  or visit RelayService.gov.au

See **productsafety.gov.au** for Australian product recall information

Yours sincerely, [name] [position]

# In store advertising poster



# **Product Safety Recall**

### Do you own this product?

"[Click to add: Product name]"

"[Click to add: product identifiers]"

Dates sold: "[Click to add: dates sold]"



Why the product is recalled: "[Click to add: Text]"

Hazard: "[Click to add: Text]"



- 1. "[Click to add call to action statement]"
- Send us an email or phone us if you are unable to return the product or have sold or gifted it to another person



Ask our staff to find out more about the recall.

[email@email.com]

"[Phone number]" Xam to Xpm Monday to Friday



Purchased from: "[Click to add: Text]"



Scan for information about this recall

[Add your own QR Code or remove if not required]



Set yourself a reminder to check at home

- Take a photo of this notice
- Set a reminder on your phone

PRA [xx/xxxx]

See **productsafety.gov.au** for Australian product recall information

# **SMS**

# Message for unknown consumers

From: [supplier name]

PRODUCT SAFETY RECALL:

[product].

Do you own this product?

[insert call to action]

More details: [web address].

PRA No.[XX/XXXX]

Unsub: reply STOP

# Message for known consumers

From: [supplier name]

PRODUCT SAFETY RECALL:

You bought [product] from us in [MM YY].

[insert call to action]

More details: [web address].

PRA No.[XX/XXXX]

Unsub: reply STOP

Understand your obligations under the <u>Spam Act 2003</u> and the <u>Privacy Act 1988</u> before sending an SMS to consumers.

# Social media message

### Example:

Does your child sleep in these pyjamas? Stop using the product immediately and return it to the place of purchase for a full refund. [Link to recall information]



- Include a call to action and ask a question to viewers see examples.
- Keep your message simple with plain language, easy and short words:
  - include a clear image of the recalled product
  - add the product name
  - describe the defect use the approved words from your recall message
  - refer to the maximum harm that can occur, which may mean specifying "death or serious injury" as the potential harm that could occur.
- Set a schedule to repeat your message your social media manager or coordinator may have this available for you to use.
- Add a Learn More or Contact Us button if the option is available direct consumers to the
  recall information on your website, the recall notice on the Product Safety Australia website, or an
  online form where consumers can contact you.
- Create a story to use in addition to your social media post:
  - include your social media image
  - ask a question to consumers (see examples)
  - include the words: Swipe up to learn more about the recall OR Swipe up to get your refund
  - direct consumers to the recall information on your website, or your recall notice on productsafety.gov.au
  - the swipe up option may only be available to business social media profiles with a large number of followers.

# Increase the reach of your social media message

Social media platforms use algorithms to decide what messages are shown to followers. Use a combination of paid and organic social media posts to promote your recall message.

# Paid social media advertising

Consider paid options on social media channels (e.g. boost posts) to increase views and widen the reach of your recall message that goes beyond your immediate followers. Chances are, not all your consumers are following you on social media. Paid advertising will help you reach consumers who received the product as a gift or bought it second hand.

# Organic social media posts

There are many ways you can increase the chance of your recall message being seen by your consumers on social media platforms.

Tips to help you to get your recall message out there.

- Ask associated businesses, industry associations or groups to share your post of the recall.
- Share your message on fan groups/pages.
- Encourage your followers to share and tag friends or family who may be affected by the recall.
- Interact with comments on your recall message, including thanking people for sharing/tagging and answering any questions about the recall. Make sure you have adequate staff on standby to support this function, especially in the first few days of the recall announcement, where consumers will ask questions or request further information.
- Repost your recall message multiple times over the duration of your recall.

# Make all your recall messages accessible

- Use plain language.
- If you use hashtags, capitalise the first letter of each word. For example: #ProductSafety.
- Use emojis, not emoticons.









- Use alternative text (alt text) to describe the images. Alt text is used to describe an image and
  is read by screen readers. This allows for images including photographs to be accessible to a
  person with vision impairment.
- If using a video in your message, provide captions. Provide a transcript for audio and video content.
- Provide:
  - contact details for the Translating and Interpreting Service you may be charged for this service
  - contact details for the National Relay Service for hearing and vision impaired consumers
  - a toll free phone number for consumers to contact your business.

# Using QR codes

You can add Quick Response (QR) codes to your communications. QR codes are a low cost and convenient way to direct consumers to recall information on your website and can be purchased online.

You can use QR codes to direct consumers to:

- frequently asked questions about your recall
- various forms including:
  - indicating they don't have the product anymore, or
  - making an appointment for the product to be repaired.

Select a dynamic code. This will direct consumers to the latest information on your website.

In addition to knowing your obligations for collecting private personal information, you need to consider the following security concerns with using third-party providers for your business:

- make sure they are trusted providers
- validate third-party privacy agreements and measures for capturing and storing customers' personal information.

The <u>Australian Cyber Security Centre (ACSC)</u> provides guidance for businesses to help protect them against cyber threats.

If you are using a QR code that directs consumers to your website, the ACSC provides the following guidance for businesses:

- Avoid services that shorten or obscure the website address.
- Test the code to make sure you are being directed to the correct website. Test before issuing the code to consumers and regularly check it throughout the recall process to make sure it hasn't been replaced with a malicious QR code.
- Place the QR code in a prominent position on your communications.
- Give a description and the website address so that consumers know what to expect. Consider providing a screenshot of the website. This also gives consumers the choice to access the website using the website address instead of the QR code.

Due to the increased use of QR codes post COVID-19, the ACSC has guidance on QR codes which can also be applied when setting –up QR codes for recall purposes. You can access the guidance here:

https://www.cyber.gov.au/acsc/view-all-content/publications/quick-response-codes-covid-19-environment

# **Tools**

Translating and Interpreting Service (TIS)

National Relay Service

Census 2016, Language spoken at home: ABS.Stat

Avoid sending spam

Promoting your business through SMS and email



