



VLP LAW GROUP LLP

Practical Tips for Responsible Social Marketing

Published by Law360

By Char Pagar

Law360, New York (February 11, 2013, 1:34 PM ET)

OVERVIEW

According to the Federal Trade Commission, advertisers who run social media advertising campaigns should mandate proper disclosures, make sure the team members working on the campaigns know what the rules are, and monitor what the team members are doing. These concepts, while easy to understand, can be challenging to execute. An advertiser may want to consider the following ideas when designing its social media compliance program: First, the advertiser should review carefully its agreements with social media endorsers, social media networks, ad agencies, and/or public relations agencies who manage social media relationships to evaluate whether those agreements outline with sufficient specificity what each entity is required to do. Second, the advertiser should consider structuring (or restructuring) its agreements so that the advertiser receives a regular report that includes specific links to the relevant posts by social media endorsers. Finally, the advertiser should review those reports, internally or externally, to determine whether adequate disclosures have been made. If a regulatory inquiry occurs after these steps have been taken, the advertiser can point to its program as a concrete demonstration of its good faith efforts to meet the FTC's standards.

--By [Char Pagar](#), VLP Law Group LLP

Click [here](#) for full article.