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Writing for the ACCC and AER

2021

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Detailed guidance on writing for the ACCC and AER

This guide includes detailed guidance on writing clearly for the ACCC and AER, including structuring content, word usage, our organisational tones of voice, document checklists and drafting media releases.

Planning for the ACCC/AER writing process

Before starting to write, you must research and plan your content. Make sure you are clear about what you want to say and why it is crucial information for the people who will use it.

To ensure content meets user needs, the Style Manual advises to [write for the user, not 'an audience'](#). You should still know your audience and keep them in mind when you write, review and edit each draft. Content may require bespoke styling for different channels and audiences. For example, media releases generally follow news style. [Strategic Communications Branch](#) can advise further.

Plan

Topic and purpose	<p>Why are you writing?</p> <ul style="list-style-type: none"> • What is the topic? Why does the ACCC/AER need this written communication? (Check we haven't already communicated this elsewhere.) • What is its purpose? Do we want to persuade, inform, make a call to action, educate, inspire, explain, build rapport, give a decision, make a submission, seek information, investigate or enforce the law?
Context	<p>What's happening?</p> <ul style="list-style-type: none"> • Are there any current issues influencing what you can and can't say or how you approach the target audience about this topic? • What messages must be included? • Is there any information that is too sensitive to include? Discuss this with your GM, Legal branch and relevant committees to ensure you are aware of all aspects of the current context before you start writing. Check again throughout the drafting process in case of changes.
Audience	<p>Who is the audience (ACCC/AER employees, consumers, business, industry, other regulators, opinion leaders, government, media, community, stakeholders)? What is important to them?</p> <ul style="list-style-type: none"> • What information do they need and want? • What's the best ACCC/AER tone of voice for the audience and purpose? • What language and channels will most effectively engage the audience? Some audiences (such as consumers) will require more straightforward, simple language than others (such as specialist industry groups).
Outcomes	<p>What do we want the audience to think or do?</p> <ul style="list-style-type: none"> • Does the ACCC/AER want audiences to think or act differently after reading your document or webpage? What actions do we want audiences to take? • Choose the tone of voice and style to maximise our influence on the audience. • Set SMART objectives (specific, measurable, achievable, relevant, timely). Measure the effect of your writing on the audience (not just distribution).

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	<ul style="list-style-type: none"> • Set a lifespan and ensure content will not date prematurely.
Map content	<p>Brainstorm and map the structure of your content</p> <ul style="list-style-type: none"> • Gather all relevant information and analyse it in view of the purpose, context, audience, preferred channel and intended outcome. • Use brainstorming, mind maps, argument maps and structure maps to explore and order the content.
Talk to clarify ideas	<p>Talk your way to clarity</p> <ul style="list-style-type: none"> • Discuss your plan with colleagues to check that the purpose and content are accurate and clear. • Consult with your GM, Legal branch or relevant committees while drafting – remember to continually check for any changes in context. • Contact Strategic Communications about your communications options.

Draft

Structure your content	<p>Write your first draft</p> <ul style="list-style-type: none"> • Define key messages and content needed to achieve the intended outcome. • Work out a logical approach to telling the story using the inverted pyramid structure – key messages first, substantiated with increasing detail in logical order. • Plan ways to guide the audience through your logical story or argument by: <ul style="list-style-type: none"> ○ drafting a unique, purposeful title, headings and subheadings ○ writing bullet points of content under each section heading and subheading ○ adding relevant data, graphs, charts and images to assist the reader ○ ensuring paragraphs and sections have a logical flow.
Language	<p>Use language the audience will understand</p> <ul style="list-style-type: none"> • For example, community and stakeholder groups will not be familiar with industry terms so written and verbal communication will require more detail or the use of simple language. • Use plain English, active voice, and short words and sentences – no jargon, unless your audience is a known expert or there is a genuine legal risk to the ACCC/AER. • Use the right ACCC/AER tone for the audience and purpose. • Try to limit sentence length to 25 words with one idea per sentence. • Vary sentence lengths to create rhythm and cadence, and to maintain interest. • Try to limit paragraphs to 4 to 6 sentences with one topic per paragraph.

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	<ul style="list-style-type: none"> • Ensure you're writing for a reading age of grade 8. • Consider whether the document or presentation will need to be available in languages other than English.
Layout:	<p>Make your writing and presentation consistent and accessible</p> <p>To ensure a readable layout use:</p> <ul style="list-style-type: none"> • the required ACCC/AER Microsoft templates, if one is available for your purpose • a unique, purposeful title, and headings and subheadings – don't use questions as titles or headings as these are too long to scan and less easy to search on the web • scannable bullet point lists to simplify information and make it easy to read • accessible tables, charts and images to make data easy to understand • plenty of white space • appendices for complex background data.

Edit, approve and review

Edit	<p>Ensure accuracy, brevity and clarity in all communications</p> <ul style="list-style-type: none"> • Work with Legal to ensure your use of plain English poses no genuine legal risks. • Use qualifiers such as 'generally' or 'usually' to minimise risks if there are complex exceptions that won't be detailed further. • Read the content aloud with a colleague. • Remove unnecessary words, phrases and repetition. • Check facts and references. • Correct spelling, grammar and punctuation. • Use active not passive voice • Rewrite headings and restructure the order if necessary to improve the logic. • Ensure consistency with <i>ACCC/AER writing style guide</i>.
Get approvals	<p>Before publishing, get appropriate level of approval; if in doubt ask your manager. Never publish without approval.</p>
Review	<p>Evaluate communications.</p> <ul style="list-style-type: none"> • Get web and distribution statistics to check audience reach. • Get feedback from internal and external stakeholders on effectiveness of writing. Did it inform, engage or motivate the audience to act? • Double check details, dates, numbers are accurate. • Check if the context has changed and arrange to make updates as needed. • Retire or archive documents that are out of date or no longer needed.

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Checklists

ACCC/AER writing checklist

- Plan first
- Identify your audience and channels, and what you want your audience to think or do
- Decide on the structure – the inverted pyramid will usually be suitable
- Choose the right tone of voice
- Use bullet points, headings, visual aids and white space as per this guide
- Use short, simple sentences ideally with 15 to 25 words
- Use the active voice
- Use plain, simple language
- Delete tautologies and unnecessary qualifiers
- Consider the risks of using excessive legalese
- Check readability – [Flesch Reading Ease](#) score of 60+ or reading age of grade 8 (depending on your audience).

Use this writing process with the following checklists for writing specific documents:

- [Decisions documents](#)
- [Executive briefings](#)
- [Letter writing](#)
- [Ministerial correspondence](#)
- [Report writing](#)
- [Web content writing](#)
- [Social content writing](#)
- [Email content writing](#)
- [Fact sheet writing](#)

To ensure consistency, also refer to the following sections:

- [Writing clearly](#)
- [ACCC/AER tones of voice](#)
- [ACCC/AER writing style rules](#)

Structuring your content

The Style Manual promotes the [inverted pyramid](#) for digital content, but ensure you pick the [type of structure](#) that works for your audience and purpose. The inverted pyramid will ensure the audience gets the most important information in the first sentence or paragraph.

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The inverted pyramid

The inverted pyramid shape dictates that you state brief, broad key messages, decisions, outcomes or conclusions in the introduction so the audience immediately gets a synopsis of the entire story. This is represented by the broader part of the triangle. You then support this opening synopsis with more detailed and complex information in the later paragraphs, heading down to the point of the triangle.

The inverted pyramid does not signify the number of words or amount of detail placed in the introduction and early paragraphs. Once you have made your broad opening statement, you then substantiate this synopsis by guiding the reader through a logical explanation of how you got to the key message. The further you go into the point of the inverted pyramid, the more complex and technical the detail can become.

The approach suits media releases because the content effectively decreases in importance from the top of the pyramid down, meaning subeditors can cut from the bottom.

The approach benefits the audience because they can:

- get key messages and see what's important for them in the first sentence or paragraph
- scan purposeful headings and appendices in logical order to find supporting details of interest
- read appendices if they want highly detailed background data.

Writers benefit by knowing that the audience who've only got to the first paragraph have received the nub of the message. This approach also helps you to clarify your argument or story and leave out unnecessary details.

Writing clearly

It is important to write with your audience in mind. Say exactly what you mean using short words and sentences that you know the audience will understand. The following tips will help you use plain English to write clearly and accurately. See the [Style Manual](#) for more about [clear language and writing style](#).

Break information up under purposeful headings

- Use unique, purposeful headings and subheadings to help the audience scan a page, find what they're looking for and follow the flow of content. The same principles apply to audiovisual content.
- Keep headings and subheadings short and descriptive.
- Use keywords in headings and subheadings to help optimise web searching.
- Avoid using questions as headings and subheadings as these hinder web searching.
- When structuring content using headings, you must follow the heading numbers sequentially without skipping a level:
 - H1 – page title
 - H2 – heading
 - H3 – subheading.

This is important for accessibility as people using screen readers use headings as navigation points.

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Heading punctuation and capitalisation

Ensure your headings follow these rules:

- Don't use full stops.
- Only capitalise the first letter of the first word, unless the heading contains a proper noun:
 - Product safety in Australia (not Product Safety in Australia)
 - Meet the Employee Council
- Use ampersands (&) in Level 1 ACCC/AER website headings to make them easier to read, but don't use them in other headings. Don't use '@' in headings.
- Avoid using question marks and exclamation marks.
- You can use commas, colons, semicolons and dashes in headings, but don't use more than 6 words.

Write clear sentences

Use short sentences, ideally with 15 to 25 words. Focus on helping the audience get the information they need as quickly and easily as possible.

- Try to express only one idea per sentence.
- Don't use long strings of adjectives; get to the point.
- Don't use double negatives.

Use active voice

Active voice puts the most important part of a sentence first. This gives your writing energy and makes it easier to read. A simple active voice sentence is made up of:

- the agent (who)
- a verb (is doing)
- a target (to whom),

Passive voice sentences often have 'by' in front of the agent:

- Active: The ACCC monitors petrol prices.
The ACCC will monitor petrol prices.
- Passive: Petrol prices are monitored by the ACCC.
Petrol prices are to be monitored by the ACCC.

Passive sentences can also contain the following phrases:

- is to be; are to be
- will be; may be
- is being; are being
- there is; there are
- there will be
- that will be
- in regard to.

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Abstract nouns or nominalisation also create passive voice.

- 'implementation' is the nominalisation of 'implemented'. It makes the sentence passive:
 - Active: The ACCC has implemented the new method.
 - Passive: The implementation of the new method has been done by the ACCC.

You can correct this by using a verb instead of an abstract noun:

Passive	Active
completion	complete
investigation	investigate
introduction	introduce
provision	provide

Use simple verbs instead of nouns to ensure your writing is active and direct.

Sentences that have no agent are also passive:

- Active: The ACCC wrote to you on 13 May 2020.
- Passive: The letter was written on 13 May 2020.

See instructions under [Check for readability](#) in this section of the guide to learn how to activate and use the passive voice checker in your MS Word spell check.

When it's acceptable to use passive voice

You can use passive voice if you *need* to hide the agent of the action.

- The cartel was set up in 2009.

In this case, the author may have to hide the agent because the author doesn't know who set up the cartel or is not permitted to reveal that information for legal reasons.

You may also use passive voice in research report writing style to present objective findings:

- Active: We observed that businesses were ignorant of the law.
- Passive: Businesses were observed to be ignorant of the law.

Occasionally you may use passive voice when the focus of the sentence is the action or the target, but usually you should try to rewrite the sentence so it's active.

Write paragraphs that can stand alone

Each section of your writing should deal with a theme. Each paragraph in the section should deal with one idea within that theme.

- Start each paragraph with a topic sentence.
- Write sentences elaborating on that topic in logical order so they flow to the topic sentence of the next paragraph.
- Vary the length of sentences within each paragraph to add emphasis, if needed, and sustain the reader's interest by creating rhythm and cadence.

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Break information up into lists

- Use bullet points to summarise and split up complex information.
- Write concise lists with 2 to 10 items.
- Only use long lists for short, familiar items – for example, names of countries.
- Give list items some order to help with scanning – for example, alphabetical or chronological.
- Use numbered lists for instructions or if the order is critical. Start each item with a verb and use full sentences. Each number should be followed by a full stop.
- Ensure the list items are similar and belong together in the list.
- Apply the same parallel structure to each list – full sentences, questions or sentence fragments, but never a combination of these.
- Don't use 'and/or' between points, unless necessary for legal accuracy.
- Avoid multilevel lists wherever possible.

Use short words and phrases

Use short words instead of long words, for example:

Delete	Replace
commence*	start
eventuate	occur, happen
exceeding	more than
facilitate	ease, help, simplify, organise
firstly, secondly	first, second
implement	start, adopt, fulfil, carry out
inherent in	in
necessitate	need
optimal	best, most, better
previously	earlier, before
proportion	part
terminate*	end

* You may need to use 'commence' and 'terminate' in a legal document.

Delete unnecessary words and phrases

Unnecessary words and phrases make your writing long, passive and difficult to understand. Avoid the following phrases:

- in fact
- in that regard
- in the final analysis

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- in turn
- indeed
- it goes without saying
- it is evident that
- it is important to note that
- it is worth noting that
- it should be noted that
- it should be pointed out that
- more or less
- namely
- naturally
- needless to say
- of course
- on the one hand
- on the whole
- order of magnitude
- somewhat
- the fact remains that
- whole [the adjective]

Use this table to find words you should avoid and replace them, when appropriate, with a simpler alternative:

Avoid	Use
in connection with connected with in relation to	about
an estimated (this is different from the context of 'We have used calculations to estimate ...')	about, approximately
in reference to with regard to concerning the question of as regards to the matter of	about, for
aims to ensure that	aims to
impacts upon	affects

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impact	effect
notwithstanding the fact that in spite of the fact that despite the fact that regardless of the fact that	although, even though
in addition to	and, also, as well as
at the same time	and, while
on the basis of	because of, on, from
due to the fact that owing to the fact that arising from the fact that considering the fact that in light of the fact that given that as a consequence of in as much as in view of for the reason that	because, since
are in a position to has the capacity to are able to have the opportunity to	can
lacks the ability to	cannot
despite the fact that	despite, although
on behalf of	for
on the occasion of in situations in which in cases where, cases in which in the event that	if, when (never 'where')
a number of	some, several

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if the circumstances should arise/transpire in the event that	if, should
it is essential that (you) it is necessary that (the business) there is a necessity that (we) it is important that (the manager)	you must the business must we must the manager must
on a regular basis	regularly
in the foreseeable future in the near future without due delay	soon (if you can't be more precise)
in order to	to
in most cases	usually, generally
there is a possibility that we circumstances could arise in which we the potential exists for us	we might, we could
it is anticipated	we expect
in the event of	when
associated with in association with	with

See the Style Manual for more about [plain language and word choice](#).

Don't repeat yourself

Delete tautologies

A tautology is 'the needless repetition of an idea, especially in other words in the immediate context, without imparting additional force or clearness.' ([The Macquarie dictionary](#).) As you are editing, delete tautologies. Some examples are:

- new initiative
- attached hereto
- at this point in time
- basic fundamentals
- brief in duration
- cooperate together
- join together

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- mutual cooperation
- plan in advance
- seems apparent
- very unique

Delete qualifiers

Some qualifiers are implied in the verb, such as these in the following split infinitives:

- to 'clearly' understand
- to 'definitely' believe
- to 'virtually' have.

You should delete unnecessary qualifiers.

Use modern language

Always replace outdated words and phrases with modern ones:

Replace	Use
amongst	among
forthwith	now, immediately
hence	so, therefore
henceforth	from now on
hereby	now
herein	here, in this
herewith	with
last but not least	finally
wherein	in which
whilst	while

If you have to use jargon when speaking to audiences with little or no background knowledge, follow it with a plain English explanation or definition. This is particularly important when communicating with community members and stakeholder groups who may not have engaged with the ACCC/AER before.

You can:

- call the reader 'you' – you wouldn't use words like 'the applicant' or 'the supplier' if you were speaking with somebody
- refer to the ACCC/AER as 'us' and 'we' but never 'it'
- start a sentence with 'and', 'but', 'because', 'so' or 'however'

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- split infinitives if this makes the meaning clearer. So you can say 'to better manage a situation'
- end a sentence with a preposition – this is something we should stand up for
- use the same word twice in a sentence if you can't find a better word
- use contractions to create a friendly, conversational tone
- use 'they' to refer to the singular, rather than writing he/she/his/hers. See the Style Manual for more about using [gender-neutral language](#).

'a' and 'an' – [indefinite articles](#)

[Colons and semicolons](#)

[Commas](#)

When not to use commas

Don't use commas:

- to mark off a defining relative clause that alters the meaning:
 - Correct: Businesses that fail to comply are likely to face hefty penalties.
 - Incorrect: Businesses, that fail to comply, are likely to face hefty penalties.
- after abbreviations
 - i.e.
 - e.g.
 - viz.
- in addresses
 - 23 Marcus Clarke Street
- before matters marked off by parentheses or dashes because they replace the comma
- in adverbial phrases after a very short introductory phrase unless it contains figures and is followed by figures or could cause confusion:
 - In June 1998 the ACCC instituted proceedings in the Federal Court.
 - By 1980 there were 333 employees.
- in defining phrases, which limit the meaning of a main clause:
 - Birds such as the swallow and the stork are migratory.

Common comma errors

Don't use one comma when there should be two or none:

- Correct: ACCC Chair Rod Sims said
- Incorrect: ACCC Chair, Rod Sims said
- Correct: A directions hearing was held in the Federal Court, Sydney, today.
- Incorrect: A directions hearing was held in the Federal Court, Sydney today.

Don't insert a comma between a subject and its verb when the subject is very long:

- Correct: However, businesses that have assessed their practices and made the right changes to comply have nothing to fear.

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- Incorrect: However, businesses [subject] that have assessed their practices and made the right changes to comply, have [verb] nothing to fear.

Don't use a comma before 'and', 'or' or 'etc.', unless their omission might cause ambiguity (such as in the previously mentioned example sentences with potentially confusing lists).

Conjunctions

In modern writing conjunctions are commonly used to start a sentence.

Count nouns and non-count nouns

Use the quantifying terms 'few' or 'many' for nouns that can be counted. Use the quantifying terms 'less' or 'more' for nouns that cannot be counted.

Use 'fewer' when talking about comparative numbers of count nouns:

- We have fewer computers in our Townsville office than in Melbourne.

Use 'less' when talking about comparative amounts for non-count nouns.

- We care less about court costs than consumer redress.

Ellipses - click to follow the link to the Style Manual

Personal pronouns

Personal pronouns are used to replace proper nouns. They can be singular or plural and become the subject or object in a sentence.

First person personal pronouns emphasise the writer's position (I, my, me, mine, we, us, our).

Second person personal pronouns make it sound as though a real person is receiving the message (you, your).

Third person personal pronouns can be less personable (he, his, she, hers, it, its, they and their).

Using first and second person personal pronouns is friendlier and helps build a relationship with the audience and give the organisation a more human face.

You can also use 'who' as a pronoun but avoid 'whom', as it is old fashioned.

- Correct: The man who I was speaking with has left the room.
- Incorrect: The man with whom I was speaking has left the room.

Subject	Possessive (before nouns)	Object	Possessive (after verbs)
Singular			
I	my	me	mine
you	your	you	yours
he	his	him	his

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she	her	her	hers
it	its	it	its
Plural			
we	our	us	ours
you	your	you	yours
they	their	them	theirs

Always ensure personal pronouns agree with each other and the verb and are consistently singular or plural, otherwise you may confuse the reader, for example:

- The businessperson refused to talk to the enforcement officer. She would not hand over the information.

Which person is refusing to hand over the information? Depending on the true meaning, you would need to rewrite this as:

- The businessperson would not hand over the information and refused to talk to the enforcement officer.
- Since the businessperson refused to talk, the enforcement officer would not hand over the information to her.

Adjectives – making comparisons

Positive	Comparative	Superlative
petty	pettier	pettiest
radical	more radical	most radical
bad	worse	worst
difficult	more difficult	most difficult

Adverbs – making comparisons

Positive	Comparative	Superlative
quickly	quicker	quickest
fast	faster	fastest
well	better	best
badly	worse	worst
interestingly	more interestingly	most interestingly

Prepositions

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Always use simple prepositions.

Relative pronouns

'Which' and 'that'

'Which' and 'that' are relative pronouns used to add information to a sentence. A relative clause gives us more information about someone referred to in a main clause.

Which:

- adds non-essential information – a non-defining clause
- is used with one or two commas.

That:

- adds essential information – a defining clause
- may be left out in some situations
- requires no punctuation.
 - The businessperson that I spoke with knew about the law.
The businessperson I spoke with knew about the law.
 - We knew that the report was yours.
We knew the report was yours.

You cannot substitute 'which' and 'that' without changing the meaning.

- We never circulated the research findings that were likely to cause embarrassment.
(The uncirculated research findings were the ones likely to cause embarrassment.)
- We never circulated the research findings, which were likely to cause embarrassment.
(None of the research findings were circulated because of their embarrassing nature.)

They're, their, there

They're: they are.

- Their: it belongs to them.
- There: It's not here, it's over there.

Try and or try to

'Try and' is colloquial for 'try to'. Don't use 'try and'.

Where, when or if

Don't use 'where' as a substitute for the more precise words 'when' or 'if', when starting a sentence with an adverbial clause:

- If a report has a definite and tight deadline, contact the Strategic Communications Branch early in the process.

Whether or if

Whether introduces the possibility of an alternative:

- We may find it difficult to determine whether they understand the criteria for meeting safety regulations ...

If is used when there is a condition in the statement:

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- Please let us know if you would like us to explain the safety regulations.

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Your or you're

Your: you.

'You're' is the contraction of you are. The apostrophe represents the missing 'a' in the word 'are'.

Adverse or averse

Adverse: unfavourable.

Averse: disinclined.

Advice or advise

Advice is a noun: The firm's advice to users is ...

Advise is a verb: The firms advise users to ...

Affect or effect

Affect (verb: to influence)

- How did his death affect her?

Effect (verb: to bring about)

- To effect an escape.

Effect (noun: the result)

- The effect of heat.

Aggravate or exacerbate

Aggravate: to increase the seriousness.

Exacerbate: to worsen.

Alternate or alternative

Alternate (verb): to change about by turns.

Alternate (adjective): 'By having *alternate* representatives the branch will ...'

Alternately (adverb): 'They *alternately* represented the division.'

Alternative (noun): represents a choice: 'The *alternative* to the current representative is ...'

Don't use 'alternative' unless it implies a choice. If there is no choice use: 'other', 'new', 'fresh' or 'revised'.

Among or between

Among and between are used when 2 or more things or people are being related.

Between: a distinction about just 2 things or people.

Among: a distinction about more than 2 things. Don't use 'amongst'.

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Amount of or number of

'Amount of' is used to describe mass.

'Number of' is used to count items.

Anticipate or expect

Anticipate: to foresee or act in advance.

Expect: to believe something will happen.

Arbiter or arbitrator

An arbiter is someone who can settle a dispute.

An arbitrator is someone appointed by disputing parties to settle an agreement.

Base or basis

A base is a foundation.

A basis is a first principle.

Compare with or compare to

A is compared with B when you draw attention to the difference. A is compared to B only when you want to stress their similarity:

- It's like comparing apples with oranges. (difference)
- Shall I compare thee to a summer's day? (similarity)

Continual or continuous

Continual: repeated with interruptions.

Continuous: ongoing without interruption.

Different from or different to

Only use 'different from'. 'Different to' is grammatically incorrect.

Diffuse or defuse

Diffuse: spread.

Defuse: to render a situation harmless.

Disinterested or uninterested

Disinterested: unbiased, neutral or impartial – having no vested interest or stake.

Uninterested: indifferent or bored – showing no interest or concern.

Due to or because of

'Due' is mainly used to indicate time:

- The event was due to start at 3 pm.

Don't write: 'We cancelled the event due to rain.'

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Do write: 'We cancelled the event **because of** rain.'

Each other or one another

Only use 'each other' when only 2 are involved.

Use 'one another' when more than 2 are involved.

Fewer or less

'Fewer' is used with a plural noun: fewer speeches, fewer positions. It refers to items. Also see [Count nouns](#) and [Non-count nouns](#) in this guide.

Use 'less' for the singular mass noun and measured quantities or proportions (less than \$200, less than a third, less unemployment).

Forego or forgo

Forego: to go before. (This is old fashioned and you should avoid using it.)

Forgo: to do without. (You can use this.)

Imply or infer

To imply is to insinuate or hint.

To infer is to deduce or conclude.

- What do you imply by that remark?
- What am I to infer from that remark?

Its or it's

'Its' is possessive but does not use the apostrophe and possessive 's'.

'It's' is a contraction of it is. The apostrophe represents the missing 'i' in is.

Judge/justice

The presiding judge was Justice Smith.

Like or such as

Use 'like' for uninvolved illustrations.

Use 'such as' for an involved example.

Majority or most

Majority: more than half of.

Most: the greater part of, almost all.

Marginal, minute, minimal, minority

Marginal: at the margin, not necessarily very small.

Minute: extremely small.

Minimal: least possible, not very small.

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Minority: less than half.

Myself, me or I

Use 'myself', 'yourself', 'himself', 'herself', 'itself' etc. as reflexive pronouns:

- I have injured myself.

And for emphasis:

- I did the research myself.

Don't use reflexive pronouns because you think this sounds more polite. Use personal pronouns instead:

- I would be pleased if the Chair and you [not 'yourself'] could attend the conference.
- Please call the Chair and me [not 'myself'] to confirm times for the conference.

Use 'you and I' when the sentence could stand alone with 'I'. Always place 'you' or the person's name first:

- You and I have been invited to the conference.
- The Chair and I have been invited to the conference.
- I have been invited to the conference.
- Not: You and me have been invited to the conference.

Use a person's name and 'me' when the sentence could stand alone with 'me'. Always place the person's name first:

- Please tell the Chair and me the address for the conference venue.
- Please tell me the address for the conference venue.

Orient or orientate

Use orientate, rather than orient.

Presume or assume

Presume means to take a liberty, to be impudent:

- You should not just presume that you would be invited because you are a member of the branch.

To take for granted (as in a presumption of innocence):

- I just presumed that I would be invited; after all, I am a member of the branch.

To suppose that something is undoubtedly true:

- The Chair presumed that the meeting was still scheduled for Friday.

Assume means to:

- take or put on oneself (such as a garment):
 - He assumed an air of dignity as he entered the conference room.
- undertake an office or duty:
 - Shortly after his father's death, he assumed the position of manager.
- take as being true for the purpose of an argument or action:

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- If we all assume for the moment that the moon was made of cheese, and we were all lactose intolerant.

If the words mean roughly the same, as in 'suppose', the object-clause after presume expresses what the person really believes (or presumes) to be true, until it is disproved. The object-clause after assume expresses what the assumer postulates, often as a confessed hypothesis.

Principal or principle

Principle (noun): a fundamental truth, doctrine, rule or basis.

Principal (noun or adjective): of first importance, first in rank, chief or main:

- the school principal (noun)
- the principal reason (adjective)

Sort or sought

Don't confuse these words, as they mean entirely different things.

Sort (verb): to arrange according to sort, kind or class; to classify:

- I want you to sort the applications according to quality.

Sought (verb): past tense and past participle of seek (to go in search or quest of; to try to find by searching or endeavour):

- We have sought applications through online and newspaper advertising.

Subject and verb agreement

Make sure the subject and verb in a sentence agree.

Singular subjects joined by 'and': The purchaser and the provider *are* responsible.

Singular subjects joined by 'or', 'either', 'neither', 'nor': The purchaser or the provider *is* responsible.

A plural subject and singular subject joined by 'or': Either the purchaser or the providers *are* responsible. Either the purchasers or the provider *is* responsible.

Collective nouns

The verb is sometimes singular and sometimes plural. When the emphasis is on the group, the verb is singular:

- The group of customers *is* not large enough to warrant a survey.

But when the emphasis is on the number of people the verb is plural:

- A group of customers *have* asked ...

Also see [Organisation names](#) in this guide.

Singular nouns that end in 's'

She said 2 weeks *seems* a long period for evaluation.

They thought \$2 million *was* a fair allocation to industry.

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'There is/are ...'

Match the verb with the noun that follows:

- There *is consensus* among the committee members.
- There *are only 3 ports* in service.

That, which or who

Using the relative pronouns 'that' and 'which' is determined by whether the clause is defining or non-defining. A defining clause defines the noun. A non-defining clause adds information about a noun that has already been defined or doesn't need defining. You can only use 'that' with defining clauses. But you can use which with both.

Defining clause (no commas necessary):

- The book that I wrote in 1998 is about Chinese calligraphy.

Non-defining clause (commas necessary):

- My book on Chinese calligraphy, which I wrote in 1960, is out of print.

Use 'who' to introduce clauses about people, for example: Staff who often write ...

Use 'that' for restrictive (defining), non-human nouns, for example: The book that I was reading ...

Use 'which' for non-restrictive (non-defining) clauses about non-human nouns, for example: Cars which are parked after 5 pm ...

Only use essential examples

Only give details, proof and examples that back up and illustrate the full story provided in the introduction. Place complex background data in appendices.

Don't use examples in webpages unless they are a purposeful part of the flow of the text – the aim is to simplify detail so the audience can find what they need.

Check for clarity and legal accuracy

Always ensure your writing is clear and accurate. Work with the Legal branch when you start writing and throughout the process to ensure your use of plain English doesn't create legal risks for the ACCC/AER. Explain your audience, purpose and tone of voice to the Legal staff member and work together to get the language as clear and accurate as possible for readers.

If you need to use legal language because there is a genuine risk to the ACCC/AER, follow it with a plain English explanation. If there are complex and confusing exceptions to what you've written in plain English but your audience doesn't need to know these, you can start a sentence with qualifiers such as 'usually' or 'generally'.

Check for readability

To ensure readability, write using simple language that an average person with 7 or 8 years of education could understand. This doesn't apply if you are writing for a known tertiary educated, highly technical audience. You can check readability by reading aloud to a colleague, doing a word count, deleting all unnecessary words and phrases and replacing long words and sentences with shorter ones.

See more about [literacy and access](#) in the Style Manual.

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You also have the option of using the MS Word readability test. To set this up in MS Word:

- Open MS Word and click the 'File' button. Choose 'Options' from bottom of the left sidebar menu.
- Click 'Proofing' in the left sidebar menu.
- Under 'When correcting spelling and grammar in Word', select 'Show readability statistics'.
- Under 'When correcting spelling and grammar in Word', choose 'Grammar & Style' from the writing style drop-down menu and passive voice will automatically be selected under styles. To customise the other styles, click 'Settings' then check or uncheck as required. Then click 'OK'.
- Click 'Spelling & Grammar' under 'Review' in the MS Word ribbon menu to run a spell check. Your spell check will identify examples of passive voice and ask you to revise these as the check progresses.
- When your spell check is completed you will receive a readability statistics report that looks like the following dialogue box:

Readability Statistics	
Counts	
Words	216
Characters	1144
Paragraphs	11
Sentences	8
Averages	
Sentences per Paragraph	2.0
Words per Sentence	20.6
Characters per Word	5.3
Readability	
Passive Sentences	0%
Flesch Reading Ease	35.6
Flesch-Kincaid Grade Level	12.0

If you have a low percentage of passive sentences, have used short sentences and achieved acceptable readability scores within the ranges described below, then your text should be easy to read.

The Flesch Reading Ease score

For readable text, aim for a score of 60 to 70.

The Flesch-Kincaid Grade Level

The maximum desirable score is grade 12, representing 12 grades of education. To reach many small businesses and consumer audiences we should aim at grade 8.

If your scores show your writing is not readable for your intended audience, redraft to eliminate passive voice and long words and phrases.

Readability formulas

Check out the [Readability Formulas](#) website for details about how the [Flesch Reading Ease](#) and [Flesch Kincaid Grade Level](#) are calculated. Additional readability tools are available at this site.

You can also use the following online readability tests:

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- [Online Utility readability test](#)
- [Gunning Fog Index](#)

These programs will save a lot of time, but they can be inaccurate as they often include stops that don't mean the end of a sentence, such as in 'e.g.' This can distort the words-per-sentence average. They also sometimes include proper nouns (capitalised nouns) which can also distort the result.

Checking for Australian spelling and the ACCC/AER style

You also need to check spelling against ACCC/AER preferred spelling and [The Macquarie dictionary](#). Even with Australian English selected as the default, MS Word can indicate Australian spellings as incorrect, especially words when we require 's' instead of 'z', such as 'organise' or 'minimise'. Our style promotes use of contractions, split infinitives and ending a sentence with a preposition when using a friendly, informal tone of voice. We also use more minimal punctuation for bullet points than MS Word spell check advocates.

[Copyedit your writing](#)

Copyediting is an essential part of the writing process. A good way to do this is by reading aloud with a colleague who is not familiar with the work. That way you can check for errors and find out if your writing conveys your intended meaning and holds your audience's attention. One person should read aloud while the other marks up corrections and revisions on the hard copy.

When copyediting look for:

- errors in grammar, punctuation and spelling
- fragments that should be sentences
- missing words
- spaces and typos
- consistency with ACCC/AER style rules, preferences and tones of voice
- figure, table and box placement
- full page layout
- inconsistencies in sequential figures, page numbering, section numbering and cross-referencing to other sections of the document
- incorrect dates, telephone numbers, addresses and links
- missing content
- repetition
- illogical flow of headings and content
- arguments that don't make sense
- language and tone that don't match the ACCC/AER purpose and the needs of the audience.

Refer to [ACCC/AER writing style rules](#) to correct errors.

Edit for brevity and accuracy

After checking the effectiveness of each draft, you will need to edit your writing and ensure that you:

- fix errors found when copyediting

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- rewrite sentences and paragraphs to achieve simplicity, plain English and active voice
- delete repetition and irrelevant material
- add missing information, examples and data
- reorder sections and paragraphs if necessary so they are more logical (structural editing)
- rewrite to get the right ACCC/AER tone of voice
- delete unnecessary words and phrases
- proofread the content.

ACCC and AER tones of voice

When you write on behalf of the ACCC and AER you must write to convey the agency's brand or personality. This may mean changing some aspects of your usual approach to writing and learning some valuable corporate communications skills. See more about [voice and tone](#) in the Style Manual.

Our corporate identity

The ACCC/AER corporate identity is built around our core function and organisational values: independent, expert, strategic and trustworthy.

Choosing the right ACCC and AER tone of voice

The first step in the writing process is to decide the agency's purpose, intended outcome and audience. This will help you determine:

- which tone(s) of voice you need to use
- whether you need to use more than one tone of voice in a document
- whether you need to write several different documents about the topic in different tones of voice
- the most effective formats and channels to reach your audiences.

You may plan to mix tones of voice within a document aimed at different audiences, or if you have several different objectives for one audience that you can address in different sections.

For example, you'd begin an enforcement media release about door-to-door sales aimed at journalists, businesses and consumers as the firm enforcer of the law referring to the noncompliant businesses and penalties they face. When explaining why we made the enforcement decision or what other businesses need to do to comply, you may shift to the definitive source.

If you want to enable consumers to use their rights so they can say no to or complain about errant businesses, you would shift to the enabler tone of voice.

In a document informing businesses about the laws for different sales methods, you may write mainly as the definitive source and enabler, trying to encourage businesses to comply. When warning businesses about possible penalties, you might shift the tone to the firm enforcer of the law.

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Example – communicating about door-to-door sales laws

Audiences	Tone(s) of voice	Purpose	Typical publications and channels
Consumers	The enabler	Friendly, helpful, positive tools and information that encourage consumers to protect themselves and contact us if this doesn't work	Webpage Brochure in English and 14 other languages 'Do not knock' stickers Door hanger Facebook posts Campaign media releases
Businesses	The definitive source	Neutral, balanced, expert information on acceptable sales practices	Webpage <i>Sales practices: a guide for businesses and legal practitioners</i> Infocentre and investigation letters
Businesses and consumers Combined audiences and purposes	Mixed tones: firm enforcer of the law definitive source the enabler	Strict, serious report of breaches Neutral, balanced explanation of legal facts Reassuring consumers that the laws work	Enforcement media releases Twitter posts Facebook posts Instagram posts LinkedIn posts

Writing as the enabler

Audiences	Usually consumers, SMEs, business advisers, and consumer and financial media. Sometimes large businesses and regulated industries.
Purpose	Provide tools, advice and tips about business and consumer rights and obligations, raise awareness, give details but avoid complexity.
Tone(s)	Trustworthy – independent Effective – helpful, practical, simple, useful Responsive – relevant and timely Friendly, engaging, motivating, positive.
Typical publications and channels	Consumer and small business webpages, brochures, campaign materials, social media campaigns, and relevant media releases.

Tips for writing as the enabler

The following tips will help you write as the enabler:

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- Use a friendly and encouraging tone, rather than a neutral or negative tone.
- Get key messages out early in the summary and introductory sections, including benefits for the audience.
- Give simple, practical tips that are of vital interest to your audience and are easy for them to relate to. Make it clear how tips can help them by, for example, saving them money or getting a service that best suits their needs.
- Wherever possible, avoid legal jargon and background information about the ACCC/AER. Focus on practical things readers can do to protect themselves.
- Use a call to action that inspires your audience to act or change their behaviour.

Only use negative emotional language to enable audiences when you combine with the definitive source tone of voice to show there is balanced evidence for concern.

Stay safe on quad bikes and side-by-side vehicles

10 December 2019

Since 2011, **136 people have died as a result of quad bike accidents**, while thousands more have been seriously injured, and the ACCC is **urging** people to be vigilant about safety when using quad bikes and side-by-side vehicles (SSV) this summer ...

emotional appeal backed up with independent evidence

'We have seen a significant increase in fatalities associated with the use of SSVs because people are not wearing the seat belts that are installed in the vehicle' Mr Keogh said.

emotional language to engage and motivate combined with evidence

'Even more **disturbing** is that **40% of these deaths have been children**, with the youngest a three-year-old boy.'

'Please do not be complacent about **your safety and those of your loved ones**. Our message is clear – **wear a seatbelt every time you get into an SSV**' Mr Keogh said.

If the ACCC/AER has no powers to manage the issue, you may need to clarify our role and manage public expectations.

Don't get scammed looking for a lockdown puppy

18 May 2020

Australians have lost nearly **\$300,000** to puppy scams this year, and scammers have been particularly targeting those seeking a furry companion during social isolation ...

emotional hook of potential loss of money – what's in it for them

"**Unfortunately** the rush to get a new pet and the unusual circumstances of COVID-19 makes it harder to work out what's real or a scam."

combination of emotional language and practical information – enabling

Scammers set up **fake websites or ads on online classifieds and social media** pretending to sell sought-after dog breeds and will take advantage of the fact that you can't travel to meet the puppy in person.

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The scammer will usually ask for up-front payments via money transfer to pay for the pet and transport it to you ...	
The most common breeds reported were Cavoodles and French Bulldogs and most people contacted the scammers via an email address they found online ...	<i>balanced, expert facts – definitive source</i>
“Scam websites can look quite convincing, so try not to fall for the adorable puppy pictures they post, and remember, if the price looks too good to be true , it probably is ...”	<i>emotional language to engage and motivate, practical information – enabling</i>
So far this year Scamwatch has received over 2,000 reports about COVID-19 scams and reported losses are now more than \$700,000 .	<i>combination of balanced, expert evidence of problem (definitive source) and practical information (enabling)</i>
“If you think you have been scammed, contact your bank or financial institution as soon as possible,” Ms Rickard said.	

Writing as the firm enforcer of the law

Audiences	SMEs, large businesses, business advisers, consumer media, financial media and regulated industries. Consumers are a secondary audience as hearing about ACCC/AER enforcement gives them confidence in our consumer protection work.
Purpose	<p>Draw the line in the sand to businesses that break the law. The ACCC/AER is uncompromising and decisive in dealing with those who avoid their responsibilities.</p> <p>Help media spread the word as a deterrent to rogue businesses and warning to potential victims. Raise awareness, give details but avoid complexity.</p>
Tone(s)	<p>Leader – decisive, firm, assertive</p> <p>Effective – uncompromising</p> <p>Balanced – consistent</p> <p>Engaging, motivating, strict, serious.</p>
Typical publications and channels	Speeches, media releases, campaign materials that emotionally engage audiences to comply or suffer the consequences, and enforcement letters.

Tips for writing as the firm enforcer

The following tips will help you to write as the firm enforcer of the law:

- Use a strict and serious tone.
- Make brief references to the law, ensuring you follow any jargon with a practical explanation in plain English. This ensures we manage any legal risks by using the language of the law but also give clear messages to audiences who aren't familiar with legal terms.

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Record \$26.5m penalty and \$56m repayment ordered against training college Empower Institute	
20 September 2019	
<p>The Federal Court has ordered \$26.5 million in penalties against Cornerstone Investments Aust Pty Ltd, trading as Empower Institute (in liquidation) (Empower), the highest total penalties ever imposed for breaches of the Australian Consumer Law (ACL) ...</p>	<i>language of the law</i>
<p>The Court found that Empower had engaged in a system of unconscionable conduct when it enrolled consumers in VET FEE-HELP funded courses, by marketing courses to consumers in remote communities, indigenous communities and low socio-economic areas, making false or misleading representations, using recruiters who were practically untrained and in some cases offering inducements such as free Google Chromebooks.</p>	<i>newsworthy elements and simple explanation of what the law means in this case</i>
<p>"Between June 2014 and December 2014, Empower enrolled more than 4,000 students, often using these appalling tactics," ACCC Chair Rod Sims said ...</p>	<i>emotional language to engage and motivate</i>
<p>"We welcome the record breaking Australian Consumer Law penalties of \$26.5 million imposed by the Court, which reflect the seriousness of the conduct," Mr Sims said.</p>	<i>shift to leading change tone</i>
<p>"The magnitude of these penalties and the \$56 million ordered to be repaid to the Commonwealth should serve as a serious warning to the vocational education sector, and all other Australian businesses, that engaging in unconscionable behaviour has very significant consequences."</p>	<i>warning, emotional language to engage and motivate</i>
<p>Based on the Court's findings and using the new VET FEE-HELP Student Redress measures, the Commonwealth has decided to cancel the debts of over 6,000 consumers enrolled in courses with Empower in 2014 and 2015.</p>	<i>shift to leading change tone</i>
<p>"The ACCC welcomes the Commonwealth's decision to cancel these student debts. It is important that victims are not saddled with a debt burden because they signed up to these courses as a result of Empower's egregious conduct," Mr Sims said.</p>	<i>shift to the enabler tone</i>

Use emotional language to show the seriousness of offences and sanctions – audiences are engaged and motivated by fears of being caught and loss of finances, reputation and livelihood.

<p>"This is a landmark decision on unconscionable conduct," ACCC Chair Rod Sims said.</p>	<i>leading change tone – 'landmark decision'</i>
<p>"It also confirms the ACCC belief that the telecommunications sector must improve their standards in relation to the proper</p>	<i>strict and serious</i>

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disclosure and clarity of key terms and conditions to consumers.”	
<p>“The conduct of Excite Mobile was outrageous. Inventing a fictitious complaints handling body to deceive customers and creating a fictitious debt collector to coerce the customer to pay an alleged debt to Excite Mobile is unjustifiable and unacceptable,” Mr Sims said.</p>	<p><i>emotional language to engage and motivate</i></p>

Explain the problem using explicit, simple language and practical examples of:

- penalties given or potential penalties
- facts, figures and practical evidence of where things went wrong
- impact of breaches on consumers and other businesses.

Amaysim and Lycamobile pay penalties over ads for ‘unlimited’ mobile plans

15 October 2020

Amaysim Australia Ltd (ASX: AYS) and Lycamobile Pty Ltd have paid **penalties totalling \$126,000 and \$12,600 respectively** after the ACCC issued each of these mobile services providers with an infringement notice for alleged false or misleading representations about their mobile phone plans.

firm enforcer tone

The ACCC alleges that **each business separately misrepresented that their mobile phone plans were ‘unlimited’** in advertisements on social media designed to entice new customers, when in fact the plans had a maximum data allowance.

On or around 1 January 2020, amaysim published an advertisement on its Twitter account which included the statement ‘...your mother loves the Unlimited Mobile Data offer from amaysim’ and the hashtag ‘#UnlimitedMobileData’, which the ACCC alleges represented that the amaysim plans provided unlimited mobile data to consumers.

In fact, amaysim’s advertised plans only provided an unlimited data allowance for the first three renewals and then would revert to a capped amount, with charges imposed if the data use by customers exceeded the capped amount.

On or about 29 November 2019, Lycamobile published an advertisement on its Facebook page which referred to ‘Unlimited Plan S’ and ‘Unlimited Plan M’, which the ACCC alleges represented to consumers that these plans would provide an unlimited data allowance. Each of Lycamobile’s ‘unlimited’ plans had a capped data allowance, and customers who exceeded that allowance were subject to additional charges.

The ACCC alleges that the messages in these advertisements breached Australian Consumer Law (ACL) and were likely to mislead consumers.

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<p>“Consumers who saw the word ‘unlimited’ in the advertisements without any explanation of the limits of the plans were likely to expect they would not be charged additional fees for mobile data, no matter how much data they used,” ACCC Chair Rod Sims said.</p>	<p><i>shift to a combination of enabler and firm enforcer, with reference to our consistent approach to enforcing the law</i></p>
<p>“The telco industry has been previously put on notice that their advertisements must be clear and transparent, and must not contain claims like ‘unlimited’ without a clear and prominent disclosure of any qualification or exception which applies to the offer. We will continue to monitor mobile plan advertisements and won’t hesitate to enforce the law.”</p>	
<p>“The amount of data included in a mobile phone plan is an important factor for many consumers in choosing a plan, and it is important that consumers can readily understand what they are signing up to,” Mr Sims said.</p>	

Refer to our use of a range of powers relevant to the case or topic to reiterate our extensive and serious focus on fixing the problem if businesses fail to comply.

<p>Justice Murphy found that the company had represented that a significant proportion of meat offered for sale through its butchery was grown or raised on King Island when that was not the case.</p>	<p><i>plain English explanation of what went wrong</i></p>
<p>“Consumers deserve to be properly informed about the origin of the food and produce they purchase,” ACCC Chair Rod Sims said.</p>	<p><i>emotional language to engage and motivate</i></p>
<p>“Consumers are misled when retailers falsely associate themselves with the reputation of particular regions.”</p>	
<p>“This court case is a lesson to those retailers that might be tempted to engage in similar misleading conduct – do so and you may find yourself in court,” Mr Sims said.</p>	<p><i>warning, emotional language to engage and motivate</i></p>

If relevant, show how we’ve empowered consumers and other businesses to recognise this problem and exercise their rights.

<p>The court orders come shortly after the launch of the ACCC’s guide for consumers. The <i>Knock! Knock! Who’s there?</i> guide gives consumers information about their rights, including asking a salesperson to leave, which they must do, or asking for time to consider the offer.</p>	<p><i>shift to enabler tone</i></p>
<p>The ACCC has produced a ‘do not knock’ sticker to help consumers avoid unwanted door-to-door selling.</p>	

Writing to lead change

<p>Audiences</p>	<p>Consumer media, financial media, regulated industries, opinion leaders, legal system, government and other regulators. Consumers when announcing new laws or consumer protection measures or campaigns.</p>
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Purpose	The ACCC/AER will lead and advocate change that will result in greater consumer and competition outcomes. Raise awareness, give details but avoid complexity.
Tone(s)	Leader – future thinking, courageous, positive, motivational, engaging, decisive, pragmatic Trustworthy – independent Engaging, motivating.
Typical publications and channels	Speeches, media releases and campaigns announcing initiatives.

Tips for writing as the leader of change

The following tips will help you to write as the leader of change.

- Be visionary and inspiring. If you're not feeling that way as you write, look at the content again to identify aspects that offer exciting, new leadership opportunities for the ACCC/AER to make emerging markets or new powers work for the public good. Focus on telling that story.
- Use positive words that evoke energy and excitement, rather than being flat and neutral.
- Use short, active sentences to create a pace of excitement and enthusiasm.
- Demonstrate our knowledge and expertise with brief references to relevant details the audience will understand.
- Show that we can see both sides of the emerging picture and have solutions to meet challenges that will ensure fair competition and consumer protections while enabling business innovation.

Our inquiry has looked at the digital platforms in relation to competition matters, consumer matters, advertising and the media. There's vital linkages between those four topics and this whole area of digital platforms requires a holistic approach. In this sense our study has been unique in the world. It's the breadth of coverage that differentiates the work we've done compared to other reports that have occurred around the world ...

varied rhythm and positive pace

Now the digital platforms are gateways for businesses to reach consumers and for consumers to access news and information. The issues associated with digital platforms therefore span the entire economy. **We of course recognise the large innovation and other benefits that societies had from the growth of digital platforms. However these digital platforms have been too slow to recognise, let alone address, the costs associated with the operation of their platforms.** Indeed the inquiry has uncovered some serious issues related to market power of the digital platforms that affects Australian businesses, the media, advertisers and particularly consumers.

seeing both sides

Rod Sims, 26 July 2019, Digital Platforms Inquiry speech

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Refer briefly to the ACCC/AER's current and future work and role in the area, but not in the threatening tone we use as the firm enforcer of the law or in the more neutral tone we use as the definitive source. Be positive!

We've made 23 recommendations stemming from our inquiry for government to consider that will help level the playing field for businesses and ensure Australian consumers are treated fairly and that their privacy is respected.

Rod Sims, 26 July 2019, Digital Platforms Inquiry speech

Refer to aspects of the law or markets that the audience understands.

If leading change for consumers, engage them with positive, practical things they can do. Using legal jargon will confuse and disengage, rather than inspire them to act.

You now have legal rights when dealing with sales agents at your door.	<i>refer to new rights, but don't name the law</i>
If what's on offer costs more than \$100 (or they can't work out the value at the time of the offer), the agent must follow rules about: <ul style="list-style-type: none"> • how and when they can come knocking • information they must give you • your right to change your mind. 	<i>rights stated in simple, practical language</i>
If you ask a door-to-door sales agent to leave, they must: <ul style="list-style-type: none"> • go immediately, and • not return for 30 days. 	<i>practical tips</i>
Door-to-door sales agents cannot visit you: <ul style="list-style-type: none"> • on Sundays or public holidays • before 9 am or after 6 pm on weekdays • before 9 am or after 5 pm on Saturdays. 	<i>practical tips</i>
Check the sales agent's identity card. By law they must tell you: <ul style="list-style-type: none"> • their name • the contact details of the business they represent • why they are at your door. 	<i>practical tips</i>
Don't want a sales agent knocking at your door? Place a prominent sign that states this near your entrance.	
'Do not knock' stickers are available at www.accc.gov.au/doortodoor	<i>practical tips</i>

Writing as the definitive source

Audiences	Consumer and financial media, regulated industries, opinion leaders, legal system, government and other regulators.
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Purpose	When called upon for expert opinion and decision the ACCC/AER is a definitive source. Raise awareness, give details but don't confuse. Place complex details in appendices.
Tone(s)	Expert – knowledgeable, experienced, rigorous, relevant, timely Balanced – consistent, pragmatic Trustworthy – independent, objective, lawful Engaging, motivating.
Typical publications and channels	Decisions documents, reports, media releases, some speeches, and some webpages about decisions and expertise.

Tips for writing as the definitive source

The following tips will help you to write as the definitive source.

- Use a confident, assertive, balanced tone to show that we've carefully examined and considered all aspects and evidence.

Class exemption will enable small businesses to collectively bargain

22 October 2020

An ACCC class exemption due to commence in early 2021 will allow small businesses, franchisees and fuel retailers to collectively negotiate with their suppliers and processors, franchisor or fuel wholesaler respectively, without first having to seek ACCC approval.

plain English explanation of the decision up front

Businesses will be able to use the class exemption after the period for parliamentary disallowance expires in early 2021. This collective bargaining exemption is the first class exemption to be introduced by the ACCC.

Although collective bargaining by small businesses generally does not harm competition, it involves competitors acting together, and those businesses therefore require some form of exemption to avoid the risk of breaching competition laws.

Currently this is only available via the ACCC's 'authorisation' or 'notification' processes, but this new class exemption will remove the need for most small businesses to use those processes.

independent evidence, balanced decisions

"We hope this class exemption will help a range of Australian small businesses and franchisees," ACCC Commissioner Stephen Ridgeway said.

"There can be many benefits for businesses negotiating as a group rather than individually, including sharing the time and cost of negotiating contracts, and potentially giving group members more of a say on contract terms and conditions."

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"There are often also time and cost savings for the suppliers or franchisor the group is bargaining with. This change will mean the benefits for all parties can be gained through a much simpler and quicker process," Mr Ridgeway said.

The class exemption will apply to businesses and independent contractors who form, or are members of, a bargaining group, and who each had an aggregated turnover of less than \$10 million in the financial year before the bargaining group was formed.

This will cover more than 98 per cent of Australian businesses.

plain English explanation – move to the enabler tone to educate businesses

If necessary, use actual legal language to ensure businesses cannot find any loopholes in a decision that could arise from using simpler terms.

Unsolicited consumer agreements

This type of agreement occurs when:

- it results from negotiations by phone or at a location other than the seller's place of business, and
 - a seller, or their sales agent, approaches or calls you uninvited, and
 - the total value is more than \$100 (or cannot be determined when the agreement is made).
- Back up your reference to the ACCC/AER's view of the law with:
 - a recognition of the businesses' point of view, noting areas where we agree and disagree
 - Independent evidence, including expert opinions and quotes
 - examples of precedents
 - research findings of potential effects
 - an explanation of how we weighed up the pros and cons
 - recognition of grey areas when there is no precedent and the method we used to reach our decision.

The ACCC has reasonable grounds to suspect that Unfair Dismissals Direct may have engaged in misleading and deceptive conduct, and made false or misleading representations, by telling consumers that it would receive settlement monies on their behalf, deduct its professional fee and transfer the remaining balance to the client when, in some instances, Unfair Dismissals Direct kept the remaining balance.

Unfair Dismissals Direct advertised its services online and offered potential clients a 'free confidential assessment'. Their contract with clients outlined fees which were to be deducted from any settlement paid into the companies' accounts after successful conclusion of their claim.

"We are very concerned that it appears some clients of Unfair Dismissals Direct ... were not paid the settlement balance owing to them."

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The Public Warning Notice has been issued because the ACCC has reasonable grounds to suspect that the conduct by Unfair Dismissals Direct may constitute a contravention of sections 18 and/or 29 of the Australian Consumer Law, and the ACCC is satisfied that consumers have suffered detriment and it is in the public interest to issue the notice.

Break up complex content in arguments into logical order. Use bullet points to briefly refer to a hierarchy or arguments of evidence.

Market power is the ability of a business to insulate itself from competition.

The market may be considered by asking three questions:

- which products are sufficiently close substitutes (the relevant product market)?
- which other businesses are sufficiently nearby to compete effectively (the relevant geographic market)?
- what is the functional level of the market (this relates to the stage(s) in the production/distribution process covered by a market)?

Within that market a business's market power may be determined by a combination of factors such as:

- how difficult it is for competitors to enter the market
- the business's ability to behave with little regard to what its competitors, suppliers or customers do
- the market share of the business
- the financial strength of the business
- the ability of the business to consistently restrict competition.

Writing in the internal voice

General internal tone of voice

The general internal ACCC and AER tone of voice is conversational. Follow these tips:

- At all times be genuine and transparent, reflecting the ACCC and AER values.
- Don't be too informal.
- When writing to inform others, use a factual tone but try to remain personable.
- When communicating about people issues, be personable and respectful.

Leaders' internal tone

ACCC and AER leaders should speak and write in an authentic tone reflecting their personality. Don't use a complex or constructed tone.

Thank you to everyone who joined me at home on Friday and for all the questions you asked me. I've done probably more than my fair share of interviews, but that was a new and very enjoyable experience. I hadn't been asked about my go-to snacks before, and still don't know which Harry Potter house I would be in, so you definitely served me up a few challenging questions.

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I'm glad we're finding new ways to stay in touch and build these social connections while we're all working remotely. I'd like to thank Yasmin Murray and Rose Edwards for their expert interviewing skills; it was a pleasure to share a screen with you both.

During our chat, Yasmin asked me for my thoughts on how the agency has responded to the COVID-19 pandemic and I have to say that the amount of things we're getting through is quite remarkable. While we've slowed some things down, others have certainly taken their place.

It's really quite extraordinary to see this volume and quality of work from you all during a time of great transition and change, but I do want you to make sure that you're working in a sensible way, taking care of your work-life balance.

Rod

Top Line with Rod Sims, ACCC Chair, 4 May 2020

Document checklists

Decisions document checklist

Use this checklist when writing decisions documents.

Plan	<ul style="list-style-type: none"> • Plan clear standards and expectations for the document. Complete research and analysis. Consider the material and formulate initial conclusions. • Seek approval and strategic guidance from your GM and any relevant board/committee/Commission member as appropriate. • Before writing, present your planned approach at a team seminar and involve GM/Legal branch to reach agreement on: <ul style="list-style-type: none"> • the approach to key issues • the relevant legislation • past documents which reflect best practice • arguments, reasoning and key areas to improve • heading structure, section structure and use of appendices to best guide audiences through the argument from the decision through to more complex details reserved for appendices.
Draft	<ul style="list-style-type: none"> • Use the definitive source tone of voice and the writing conventions from this guide and correct templates. • Write an introduction that outlines the issue and clearly states the ACCC or AER's decision. Apply the inverted pyramid approach. • Guide the audience through logical arguments to support the decision using: <ul style="list-style-type: none"> • a clear heading and section structure with the right level of detail in the right place (reserve complex details for appendices) • short sentences no longer than 3 lines (15 to 25 words is ideal) and short paragraphs – one idea per sentence, one topic per paragraph • internal consistency in reasoning and evidence and correct calculations and references to relevant legislation • correct spelling, grammar and word usage according to this guide and the <i>ACCC and AER guide to good writing</i>.

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	<ul style="list-style-type: none"> • Ensure you meet any maximum length requirements.
Review and approvals	<ul style="list-style-type: none"> • Rewrite any sections where the logic is unclear. Make corrections to ensure you're using the definitive source tone of voice and ACCC/AER style rules. • Get 2 peers to review the document: one who is familiar with the work, and one who is not. • Rewrite any sections where the logic is unclear. Make corrections to ensure you're using the definitive source tone of voice and ACCC/AER style rules. • Submit to director and GM for clearance before submitting to the Commission, AER, Merger Review Committee, Enforcement Committee, etc.

Letter writing checklist

Use this checklist when writing ACCC and AER letters. You can also use this checklist when writing letters to send as a formal ACCC or AER email. To access the letterhead template in MS Word, create a new document using the shared templates and select ACCC electronic letterhead or AER letterhead template. See the Style Manual for more about writing [letters](#).

Plan	<ol style="list-style-type: none"> 1. Identify the audience and purpose for your letter. Are you responding to a query or concern, giving or requesting information, saying thank you, making an invitation, seeking a submission or making a legal demand for information? 2. Decide whether a letter is needed for this purpose, or whether you could better achieve the outcome you want from your audience through a meeting, email or phone call. 3. Decide the best tone of voice and language to communicate effectively with your audience for your planned purpose. For example, if your purpose is to: <ul style="list-style-type: none"> ○ demand information, you would use a mixture of the definitive voice and the firm enforcer of the law ○ help a consumer or small business with a query, you would use the enabler ○ outline a complaint we've received to a business and seek their side of the story, you would use the definitive source because at this stage you have no evidence to support using the firm enforcer of the law.
Draft	<ol style="list-style-type: none"> 1. Keep the letter short; if possible no more than 2 A4 pages. 2. Write with the audience's needs in mind, using clear, concise language and no jargon. 3. Use the ACCC tone most appropriate for the audience and purpose. 4. Draft your content using the following structure: <ul style="list-style-type: none"> ○ Paragraph 1 – state your purpose and key message. ○ Paragraph 2 – give the background and context for your letter's key message. ○ Body paragraphs – explain main points, including the ACCC's position. Consider the current context and what information is appropriate to share. Guide the reader through logical arguments so they understand your reasoning. ○ Final paragraph – give your conclusion, restate steps, timeframes and calls to action, and give any contact details for referrals to the ACCC or other agencies.

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Review and approvals	<ol style="list-style-type: none"> 1. Proofread your letter aloud with your audience in mind. Check clarity and brevity, factual accuracy, spelling, grammar and use of ACCC styles. Simplify language and sentence length, removing unnecessary words. 2. Ensure all relevant information and evidence is included. Delete any repetition. 3. Discuss your draft with a colleague to ensure it is clear and follow the usual approval process.
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Letter writing layout

Use the following layout and structure for an ACCC/AER letter. You can adapt this for emails by removing the address and date sections and placing the topic statement in the email subject box. To access the letterhead template in MS Word, create a new document using the shared templates and select ACCC electronic letterhead or AER letterhead template.

[ACCC letterhead]

Your ref: PR 3 February 2020

Our ref: C2020/xxx

Contact phone: ## #### #####

[1 return]

<#> Month 2020

[2 returns]

Recipient's name

Position

Organisation

Address

[4 returns]

Dear ...

[1 return]

[Paragraph 1] State the purpose of letter or email, summarise the key message, offer or call to action and thank the recipient for any correspondence received. Keep your sentences short.

[Paragraph 2] Give background and context.

[Body paragraphs]

Explain details, and if needed give evidence, to substantiate the purpose of the letter. Use plain English and active voice.

Use one topic per paragraph, up to six sentences per paragraph and one idea per sentence.

[Conclusion] Briefly reiterate key message and any call to action and provide any relevant email or website addresses, telephone numbers or referrals to other organisations.

[2 spaces]

Yours faithfully

[4 returns]

Signature

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Signature block (Name and position held at the ACCC)

Report writing checklist

Use this checklist when planning and writing ACCC and AER reports. See the Style Manual for more about writing [reports](#).

Plan	<ol style="list-style-type: none"> 1. Determine the report's purpose, audience and what you want the audience to think or do as a result of reading it. 2. Before writing, complete research and analysis, and consult with relevant colleagues including Legal branch if necessary. Find out any current factors that will influence what you can and can't say. 3. Map out the introduction. It must include the topic, purpose and the key message or findings. 4. Map out the heading structure for sections that will guide the audience through your reasoning and convince them of your arguments. 5. Discuss your plan with colleagues, GM and any relevant committees and experts.
Draft	<ol style="list-style-type: none"> 1. Use the definitive source tone of voice as it's most suitable for presenting facts, evidence and logical arguments. 2. Use unique, purposeful headings and subheadings to achieve logical order. 3. Write clear, concise sentences and paragraphs using ACCC/AER style rules. 4. Use the correct template. If one isn't available, set up an MS Word style for your document and refer to the visual style guide. 5. If appropriate for your purpose, adopt the following structure: <ul style="list-style-type: none"> ○ Title page ○ Acknowledgements ○ Contents page ○ Summary – summarise key messages and recommendation in no more than 2 pages. Don't use content or quotations from the report ○ Terms of reference ○ Introduction – use the inverted pyramid approach, stating topic, purpose and key conclusions up-front ○ Methodology ○ Findings and analysis – use facts and logical reasoning and clearly labelled tables and graphs to accurately summarise support details and arguments ○ Conclusion ○ Recommendations ○ Appendices – place complex detailed information that backs up your logical argument in appendices rather than cluttering your arguments in the body ○ Reference list and bibliography – see Referencing in this guide.

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Review and approvals	<ol style="list-style-type: none"> 1. Read aloud with a peer. Check factual accuracy, grammar and spelling, clarity and brevity. Delete long words and phrases. Rewrite using short, clear options. Delete repetition and unnecessary words. Restructure if this will make the report clearer and more logical. 2. Gain all necessary approvals and submit.
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Digital content writing checklist

Use this checklist to plan and write web content.

Plan	<ol style="list-style-type: none"> 1. Contact the Web team to discuss your proposal. 2. Identify the purpose, intended outcomes, audience, channels and tone of voice. 3. Create a proposed site map structure of the content. 4. Identify topic keywords that your audience might search for in Google and use those keywords in headings and in page content.
Write	<ol style="list-style-type: none"> 1. Write a short purposeful page title in the Heading 1 (H1) style. To save space, use ampersands in Level 1 headings. 2. Write a short summary paragraph that appears at the top of the page and in search results. 3. Put the most important information first, in inverted pyramid style. 4. Write the body content using: <ul style="list-style-type: none"> o purposeful, unique subheadings (H2s and H3s) that break up information and help audiences scan content. H2 headings appear in the table of contents at the top of the page. Don't use ampersands in these headings o short sentences, short paragraphs and simple language – no jargon o bullet lists to break up information for easy scanning o sentence case – avoid upper case wherever possible. 5. Place a call to action near the end of the page. What action does the audience need to take? 6. Place related links under the 'More information' subheading at the bottom. Avoid excessive links in the main body of content because they distract the reader. 7. Use the titles of webpages you're linking to as link text. Don't use 'click here' or the URL. This helps your audience check they're on the right page and increases readability and findability. 8. If you're using images, reference the image and provide alternative text for descriptions.
Make accessible	<ol style="list-style-type: none"> 1. If an image provides information, give it a text alternative or long description that is equivalent to the content or function provided by the image. 2. Don't use colour or visual descriptions to convey information, for example 'in the green section' or 'on the right'. 3. Follow the web authoring guidelines on the intranet.

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Edit and review	<ol style="list-style-type: none"> 1. Check the writing makes sense and whether every word, sentence and paragraph is needed. 2. Cut, cut, cut. Simplify to enhance understanding and reduce text and clutter. 3. Remember to retire pages with a limited lifespan when no longer needed. 4. Always update pages when changes occur so they remain clear and accurate.
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Top digital writing tips

Use white space to create a visual hierarchy on the page.

- Pay particular attention to your article title, headings and your leading paragraph. This will be picked up by SEO engines and help the content to be found in a search.
- Don't underline text that is not a link. Use minimal bold text for emphasis.
- Don't use a PDF unless it is for printing purposes. If you do, always structure the PDF using heading styles and provide an alternative format.
- Don't use questions in headings. Only use questions and FAQs if they are real questions, for example as collected by the Infocentre.
- Avoid distracting examples unless the content is very complex and needs clarifying.
- Use 'our' and 'we' instead of 'the ACCC'.

Social content writing checklist

Use this checklist to plan, write and produce social content. See the Style Manual for guidance on [social media](#), and [video and audio](#) content.

Plan	<ol style="list-style-type: none"> 1. Identify the purpose, intended outcomes, audience, channels and tone of voice. Each social media channel is different, so ensure you understand which channel you are communicating with and what the expectations of that channel are (see below in Tips). 2. Engage the Social team to discuss your proposal. 3. List content and identify the newsworthy elements. 4. Summarise the key messages in one to 2 sentences. 5. Identify topic keywords the audience might search for in Google and use those keywords in headings and in page content. 6. Be aware of current events. During major breaking news events, manage scheduled social posts appropriately. 7. Using social channels is an intention to have an ongoing conversation with the target audience. Engage with the Social team to ensure there is a process to manage responses to any social media posts published. This may include: <ul style="list-style-type: none"> ○ identifying the subject matter experts ○ providing a brief or Q&As for the Social team ○ establishing whether any review or sign-off process is required for these responses.
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Write	<ol style="list-style-type: none"> 1. Writing for social media should generally follow the style points outlined in this guide. 2. Additional tips vary according to the channel: <ul style="list-style-type: none"> • Keep it short: <ul style="list-style-type: none"> • Twitter: 280 characters • Facebook: no limit, but aim for one to 2 short sentences • LinkedIn: no limit, but target one to 2 short sentences • Don't change the spelling or punctuation of the words themselves in an attempt to shorten the sentence • Avoid upper case wherever possible. 3. If there is a call to action, make sure this is clear, simple and short (2 to 4 words). What do you want the audience to do next? 4. Use hashtags sparingly and deliberately, for example to promote an event or connect with users at a conference. Don't use current events or trending hashtags to promote your message. 5. Never ask for likes, retweets or favourites.
Edit, review and respond	<ol style="list-style-type: none"> 1. Check that the writing makes sense and whether every word, sentence and paragraph is needed. 2. Cut, cut, cut. Simplify to enhance understanding and reduce text and clutter. 3. Make sure you have clear message-match between posts and destination pages. If the post is linking to an external page, then post messaging needs to match the landing page messaging. 4. Double-check that links are accurate. 5. Always update content with further posts when changes occur so the audience remains informed. 6. Ensure the process to respond to social posts is established. If your audience is engaging with you, you must respond quickly and concisely.

Top social writing tips

Understand the key social channels and their differences:

1. Facebook:

- is focused on community, news and entertainment
- has more website referral traffic than any other social media network, even though its growth is declining
- is growing its video content – so if you have relevant video content, use it.

You should:

- avoid obvious promotional calls to action. Facebook's algorithm can pick up overly promotional messaging and will demote your post in the newsfeed
- make your headlines catchy and shareable
- use emojis in Facebook copy (they work and can help convey your message).

2. Twitter:

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- is a public forum and real-time news platform where retweeting and curation are encouraged
- is ideal for sharing posts or promoting website content.

You should:

- limit hashtags to 3 at most
- tag other relevant accounts to increase the likelihood of sharing
- use emojis in tweet copy (they work and can help convey your message within the 280-character limit).

3. LinkedIn:

- is a professional network
- features lots of sharing of industry articles and general professional content.

You should:

- maintain a professional tone
- apply all Twitter tips above here too, but be sure that use of emojis is relevant and professional.

4. Instagram:

- is a visually led creative platform, focused on image and video content
- has captions that are as critical as the image, so check colour and font relative to image.

You should:

- - consider the primary importance of the first line of caption and the hashtag strategy
- use emojis in Instagram copy (they work and can help convey your message)
- use the maximum limit of 30 hashtags separated by several line breaks at end of caption, and select hashtags based on brand or product topic, industry, audience and location. Hashtags should be separated from the post copy as best as possible.

5. YouTube:

- is a video-sharing platform and the world's second largest search engine.

You should:

- consider the role of video: it should inform consumers, connect communities or entertain
- consider discoverability: be deliberate with video titles, descriptions and tags
- assess content: think about your structure, writing, the video's relevance to audiences and its purpose.

Ensure there is a call to action

- consider transitions: ensure any move from narrator to action shots is captured and script takes account of introduction to the viewer (for example secondary shots/B-roll)
- consider length: videos should generally be 2 to 8 minutes long. The accompanying script should be modular, with one overarching theme and several supporting modules
- set expectations: speaker should introduce themselves and the topic, say how long the video will be and introduce related content
- think about tone: conversational, with consideration to any language translations

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- plan captions: be mindful that many people view videos in a sound-off environment. Ensure the on-screen captions flow as a story
- consider context: given the effort and expense of video production, consider a snippet of relevance to media outlets.

Email content writing checklist

Use this checklist to plan and write email content. See the Style Manual for more about writing [emails](#).

Plan	<ol style="list-style-type: none">1. Identify the purpose, intended outcomes, audience, channels and tone of voice.2. Contact the email marketing team to discuss your proposal.3. Email newsletters can be ideal for:<ul style="list-style-type: none">• product and feature announcements• tips for getting the most out of existing products and services• regular newsletters• event-driven communications, for example new legislation• automated series, for example on signup• event invitations and information• system alerts• internal communications.4. List content and identify the newsworthy elements, including images.5. Identify the key call to action.6. Identify any segments of the audience if this is reflected in your email database.
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Write	<ol style="list-style-type: none"> 1. Writing for email should generally follow the style points outlined in this guide. 2. Every email newsletter is made up of the following elements: <ul style="list-style-type: none"> • from name: this is usually the company or team's name. It identifies the sender in the recipient's inbox • subject line, which should: <ul style="list-style-type: none"> • - use actionable language – make it clear to the recipient what they can do with the information in the email • - be personalised if possible to segment recipients • - be clear first, then catchy • preheader text: the top line of the campaign appears beside each subject line in the inbox. Provide the information the audience needs when they're deciding if they should open the email • body copy: keep it concise and conform to this guide. If possible and relevant, add an image to break the text and bring a visual interest to the copy • call to action: this needs to be clear. The audience should know what they need to do next. You can add a button or include a text link • footer: ensure there is an unsubscribe link, mailing address and permission reminder in the footer of each newsletter. 3. Use alt text: some email clients disable images by default. Include an alt tag to describe the information in the image for people who are not able to see it. 4. Segment the audience: if possible, segment your audience to increase the likelihood of your subscribers opening your email. If applicable, adjust the language to the target audience.
Edit, review and respond	<ol style="list-style-type: none"> 1. Check the writing makes sense and whether every word, sentence and paragraph is needed. 2. Cut, cut, cut. Simplify to enhance understanding and reduce text and clutter. 3. Double-check that links are accurate. 4. Test the campaign: use the preview mode and be sure to check the newsletter in different email clients. Send it to yourself and a colleague to see if the email is clean. 5. Review statistics during and after the campaign (opens, clickthrough rate, conversion rate, bounce rate, email sharing or forwarding rate).

Top email writing tips

- Be as brief as possible – we all receive many emails that aren't always opened or actioned.
- Avoid unnecessary links. More than 50% of emails are read on mobile devices so limit links to the most important resources to focus the call to action and prevent mistaken taps on smaller screens.
- Avoid exclamations in call to action buttons or links.
- Don't use all capitals in text links.

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- Personalise your email as much as possible. If you can segment the email database, you can personalise the subject line and provide relevant content to that email recipient.
- Make sure your call to action copy is consistent with any landing page you may be sending the audience to.

Fact sheet writing checklist

Use this checklist when planning and writing ACCC and AER fact sheets for community and stakeholder groups.

Plan	<ol style="list-style-type: none"> 1. Determine the purpose of the fact sheet, audience and what you want them to know or do as a result of reading it. 2. Consider what questions community and stakeholder groups may have that could be covered in this document. Ask: what is important to them? 3. Before writing, complete research and analysis, and consult with relevant colleagues including the Legal branch if necessary. Find out any current factors that will influence what can be included. 4. Map out the introduction or lead paragraph including the topic, purpose and key messages. 5. List the heading structure to guide the audience through the who, what, where, when and why of the information being presented. 6. Include contact information – website, email, phone, physical address and translation service details, if relevant. 7. Discuss your plan with colleagues, GM and any relevant committees and experts.
Draft	<ol style="list-style-type: none"> 1. Use the definitive source tone of voice as it's most suitable for presenting facts, evidence and logical arguments. 2. Consider the use of graphs or pictures to simplify the communication of complex information and break up sections of text. 3. Use purposeful headings and subheadings to achieve logical order. 4. Write clear, concise sentences and paragraphs using ACCC/AER style rules.
Review and approvals	<ol style="list-style-type: none"> 1. Check factual accuracy, grammar and spelling, clarity and brevity. Delete long words and phrases. Rewrite using short, clear options. Delete repetition and unnecessary words. Restructure if this will make the fact sheet clearer and more logical. 2. Ask a colleague who is familiar with the content to review the fact sheet as well as a colleague who is not familiar with it. 3. Gain all necessary approvals and submit. 4. Check periodically if the context has changed and arrange to make updates as needed.

Media release writing tips

A media release aims to promote the agency's work by engaging and informing the media.

Although it is an official document, it is not a legal document, and should not be written as though it is.

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When drafting a media release, it is important to be aware of what questions a journalist will ask, which are usually:

- Who will this affect, when and where?
- How much will it affect them?
- How does this affect a related (or unrelated but similar) issue?
- What is the next step?

ACCC media style guidelines:

- **Headline** – Arial 12 pt all caps
- **Body text** – Arial 11 pt (10.5 pt to compress text onto one page if it does not compromise readability)

Tips for writing a better media release

Readability

Don't use a long word when a short word will do. Shorter words are generally preferred as they improve readability.

Long words are useful in technical descriptions where accuracy is required. Overly technical words and phrases should be explained.

Jargon should be avoided when possible.

Essential information

The first paragraph must sum up the key issue of the media release. It should cover who, what, where and when.

Remember: if you can't explain the issue in one paragraph, you will struggle to explain the issue altogether.

Comprehension

Consider how you have described your key terms, and whether it would make sense to a non-specialist reader. If not, explain or rewrite.

Most journalists are required to cover areas outside their expertise. If your media release is unclear it will either get misreported or not reported at all.

Quotes

Quotes should occupy a prominent position in the media release. They should describe the ACCC point of view or contain the key action point for the release. They should also be something a person would actually say.

Getting the quote right is important, as most journalists will use a quote in their story without editing it. Therefore, quotes should be short and to the point.

Do not attempt to write a media release full of quotes as journalists can and do compress quotes, which can skew their meaning.

Detail

The body of the media release should contain information on legislation, timelines and technical data. These paragraphs must serve two purposes. They must contain enough

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detailed information to address the interests of industry specialists as well as remaining comprehensible to non-specialists.

It is generally not necessary to name the legislation or cite the section of the Competition and Consumer Act in a media release. Unless the subject is especially technical, references may be to consumer law or competition law. A media release that references the Trade Practices Act and subsequent incorporation into the CCA is overwritten and should be simplified.

Media release style rules

Headlines

Keep them short. Headlines need to grab attention, and they do not need to capture all aspects or nuances of a topic. Plus, when a headline has more than nine or 10 words it spills into a second line on the media release listings page, and long headlines for merger releases cannot be entered into the ASX's publishing system.

Initialisms

We should use initialisms such as CCA and ACL only if absolutely necessary, i.e. there is a repeated mention of the CCA or ACL later on. In these cases, spell out the full term and introduce the initialism in parentheses afterwards. Preferably do not introduce the initialism in the lead paragraph. Where shortened forms are technical terms, we should use them but define them at first mention.

Quotes, quote marks and attributions

Quotes should be presented in past tense with short and simple attribution – 'said' is the preference. Start sentences with the quote and attribute afterwards (with 'said' at the end). **Do not** start a sentence with an introduction or the name of the speaker.

Use double quote marks (contrary to standard document style in *ACCC and AER writing style guide 2020*). Use closing quote marks after each paragraph of quotes, even if the next paragraph is also quotes.

Use single quote marks at first mention for expert terms being defined: e.g. a 'safe harbour' defence; or be careful about who they 'friend' online. For subsequent mentions quote marks are not needed.

The CCA and ACL

Competition and Consumer Act

Competition and Consumer Act (CCA) (no jurisdiction, no year, no italics, initialism if necessary). Thereafter, CCA.

Australian Consumer Law (ACL), but breaches of consumer law and competition law (no caps).

Courts

Federal Court; the Court

Magistrates' Court of Victoria (with apostrophe)

judgment (no 'e')

court-enforceable (with hyphen)

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Names of reports and publications

Use minimal capitals (first letter and proper nouns are capitalised) and no italics for exact titles of reports, e.g. [Targeting scams report](#).

Italicise and use title case (maximal capitalisation) for names of periodical publications, e.g. *Woman's Day*, *The Australian*, *The Australian Financial Review's Infrastructure Summit*.

Capitals

Use capitals for names of our units, documents of policies, plans and programs, legislation, full titles of codes and company names (unless their style is no caps), e.g. in response to the Harper Reform legislation, the ACCC has established the Substantial Lessening of Competition (SLC) Unit.

For codes: e.g. Franchising Code of Conduct and Franchising Code but the code (no caps for generic references).

Do not capitalise inquiries, e.g. the ACCC's retail electricity pricing inquiry; the digital platforms inquiry.

Companies and organisations

For well-known companies such as Myer, omit Pty Ltd (or similar); there is no need to introduce the short form in parentheses. For other, less common names, or subsidiaries requiring distinction, use the precise name with the shortened form in parentheses and the shortened form thereafter, e.g. [Wesfarmers Kleenheat Gas Pty Ltd](#) (Kleenheat).

Companies and organisations are singular not plural – a business and its staff; Jetstar has responded... etc.

ASX codes

Format is: company name (ASX: code) with one space after the colon, e.g. (ASX: QAN) not (ASX:QAN).

Currency

In MRs where currency is relevant use the [IBAN currency code](#), e.g. AUD500, USD500 (do not include currency symbols). Otherwise a reference, e.g. to \$5 million, is in Australian dollars.

States and countries

Spell out states in full at first reference in all cases: New South Wales, Western Australia, etc. Thereafter initialisms can be used: NSW, WA, etc.

Spell out names of countries in full at all mentions (e.g. do not use UK and US, etc., except in quotes). When listing multiple states, they should be listed in alphabetical order.

Government

The Australian Government (**not** Federal or Commonwealth) and the government (no cap), but we can say the federal government generically (see Australian Government Style Manual section on [capitals for government](#)).

When mentioning government in an MR, always specify **which** government at first reference, e.g. 'Scammers are already trying to take advantage of the Australian Government's new rules...' Thereafter we can say government.

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For state governments: New South Wales Government or Government of New South Wales (both are acceptable); the government; state governments, etc.

Expressions such as government funding, etc. are not capped.

Capitalise specific government job titles but not generic references, e.g. 'The new Minister for Defence said he was delighted to have been appointed minister.'

RSPs (retail service providers)

Retail service providers (RSPs) is the preferred term (rather than internet service providers, or ISPs). Spell out in full at first reference and introduce initialism in parentheses.

Note to editors vs Background

Notes to editors are explainers; Background is for additional factual information.

Also used: 'Important note', e.g. info for consumers, or 'Correction', if required.

Bullet lists

Use sparingly. If you use them, do so in accordance with the Australian Government [Style Manual advice on lists](#).

Use a numbered (ordered) list when the order is important, such as a list of instructions.

Italics, bold and underlining

Do not use italics for emphasis. Do not italicise legislation or titles of reports.

Do not use bold or underline for emphasis.

Tense

Use present tense – has, are, is, etc. – for things that are happening now, but for references to past events, past tense should be used, i.e. the Court has ordered... and in 2020, the Court found.

Hyperlinks

Ideally, hyperlink the action/verb part of a sentence, or a suitable part thereof, unless that is too long. Hyperlinking the date if there is a list of dates in the background section is also acceptable.

Introduce a link to a hyperlinked page on our website with 'at' or similar, e.g. A copy of the ACCC's guidance is available at [A guide for egg producers](#) or via the [ACCC Consultation Hub](#). No colon is necessary.

The ACCC – it or we?

In quotes it can be either. For text that is not in quotes we use 'the ACCC' and 'it'.

E.g.: The ACCC says during its extensive consultations, it heard...

But: "We understand..." or "Our view is..." and also "The ACCC considers..."

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Numbers, measurements and money

Spell out numbers from one to nine but use numerals for percentages, measurements and money. For example:

- 1 per cent, 7 per cent etc. (not %, contrary to *ACCC and AER writing style guide*)
- 7kg, 7km (no spaces, contrary to *ACCC and AER writing style guide*)
- \$2 million
- six-year-old boy (but 'the boy was six years old').

Numbers with four or more digits (starting from 1,000) need a comma, e.g. 56,000; more than 3,700 reports; density of 10,000 hens. Use a combination of numerals and words for millions, e.g. 3 million not three million.

Do not start sentences with a number.

Dates and times

4 April 1929 not 4 April, 1929

7pm, 5am, 8:30pm (no spaces and with colons, contrary to *ACCC and AER writing style guide*)

Punctuation

Hyphens

For hyphenation, refer to the word list in this guide, then the *ACCC and AER writing style guide*, then [Macquarie dictionary](#).

Some tips:

- Use hyphens when two or more words form an adjective, e.g. a first-class experience.
- Do not use a hyphen if the first word of a compound is an adverb ending in 'ly', e.g. poorly made **not** poorly-made

Some spelling reminders

To ensure consistency, if unsure always check *ACCC and AER writing style guide* first, then [Macquarie dictionary](#), e.g. focused not focussed.

Per cent not percent (but percentage)

Re-authorise and re-authorisation

Chair not Chairman (also: Deputy Chair and Commissioner); thereafter Mr or Ms Surname

statement of issues (not Statement of Issues or SOI)

account holder

antitrust

co-ordinate and co-operate, etc.

decision making, decision makers, decision making powers, etc.

east coast gas market

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fact sheet (two words)

free market economy

information-gathering powers

over-the-counter (adjectivally) but 'buy medicines over the counter'

policyholder

policymaker

price fixing

NBN (not National Broadband Network)

roadmap

second-hand

taskforce

the then-Treasurer (with hyphen, no spaces)

ticketholder

trade mark

whistleblower

woodchip

world-wide

Executive Brief: How to write an Executive Brief

Below is a link for more information on writing executive briefings.

<https://intranet.accc.gov.au/about-us/executive-office/parliamentary-government-liaison/executive-briefing>