

**BUREAU OF INDIAN STANDARDS**  
(Draft Indian Standard for comments only)

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मॉडरेशन और प्रकाशन के लिए सिद्धांत और अपेक्षाएं

**Online Consumer Reviews — Principles and Requirements  
for their Collection, Moderation and Publication**

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**Price Group 9**

Business Services Sectional Committee, SSD 09

## FOREWORD

*(Formal clause for adoption would be added later)*

Online review sites offer consumers the chance to give feedback about their experience of using products and services, for the benefit of other consumers who might be considering buying or using them, as well as valuable feedback for the supplier's/seller's that provide the products and services.

The consumer transactions and interactions have been increasing day by day via the internet, and millions of consumers each year read and write online reviews. The rapid growth of consumer review sites, covering a wide range of products (e.g. clothes, electrical appliances, toys, cars) and services (e.g. restaurants, hotels, builders, plumbers, electricians, lawyers), has the potential to empower consumers and drive industry improvements, by creating a more dynamic way to exchange information.

Review sites can benefit consumers, making it easier to research products and services, and identify those that best suit their needs in terms of function, price, quality and value for money. These sites allow consumers to share information about their experiences, and to seek feedback and opinions from thousands of other users. Online reviews can also be a valuable resource for supplier's/seller's, helping them to meet the needs and expectations of their customers. Smart suppliers/sellers understand that proactively encouraging user reviews, and responding quickly and positively to feedback, can help them to keep customers and win new ones.

As online reviews are increasingly influential to consumers' purchasing decisions, it is vital to both consumers and suppliers/sellers that sites are managed effectively to build confidence in the quality, integrity, accuracy and transparency of reviews. Both consumers and suppliers/sellers have reported some problems with online reviews. These problems might be intentional or unintentional, but can lead to a degradation of trust in the online review process. Some problems reported include:

- a) false positive reviews written by the suppliers/sellers itself intending to mislead consumers;
- b) false negative reviews written by a supplier's/seller's competitors intending to ward off consumers from the organization;
- c) the activity of businesses specialized in "online reputation management" who offer e-commerce companies services to improve their online reviews;
- d) consumers using their newfound position of public critic and in effect obtaining better circumstances or other benefits from a supplier/seller that they review;
- e) a lack of trust concerning the veracity of consumers' reviews, and whether organizations select the better reviews, and remove the negative ones;
- f) suppliers/sellers that use consumers to write positive reviews or penalize them for writing negative reviews, in some cases contracting consumers out of the right to write a negative review.

These issues form the basis for the principles in this document standard that are designed to resolve them.

The standard was first published in 2021 as adoption of ISO 20488:2018. This revision has been undertaken primarily to make it implementable in the country. In this revision of the standard, following major changes have been incorporated:

- a) The word 'supplier' replaced with 'supplier/seller' in the whole standard.
- b) Definition of 'Review Site' added (see **3.15**).

- c) Code of Practice shall be made public by the organizations (see 4.2.2).
- d) Second para of ‘Collecting personal information for profile or nick name’ (see 5.2.2.1) modified.
- e) Note-1 added to clause ‘Control of the Identity of Review Authors’ (see 5.5.1)
- f) Note-3 added to clause ‘Reviews Collected with Reward’ (see 5.6.2)
- g) ‘Purchase date’ added to clause ‘Review submission and consumer experience date’ (see 7.1.4).
- h) The following additions have been done in clause ‘Overall Rating’ (see 7.2)
  - i) shall ensure that reviews collected with rewards does not impact the overall rating of reviews that were collected without rewards.
  - ii) review administrator shall publish a separate overall rating for reviews collected by giving rewards.
- j) The modifications done for Publication Time (see 7.6).

This document standard offers requirements to organizations that manage consumer review sites, detailing good practice throughout the process, from collection to moderation and to publication. It gives recommendations in order to increase consumer trust in online consumer reviews, increase the protection of suppliers/sellers from exploitation and mischief, and improve the purchase decisions of consumers and the quality of products and services provided by organizations.

Organizations that choose to follow this document standard can be considered to be demonstrating that they value their customers and are committed to providing reviews that consumers can trust.

In this Standard, the following verbal forms are used:

- “shall” indicates a requirement;
- “should” indicates a recommendation;
- “may” indicates a permission;
- “can” indicates a possibility or a capability.

Information marked as “NOTE” is for guidance in understanding or clarifying the associated requirement.

(The composition of the Committee....)

For the purpose of deciding whether a particular requirement of this standard is complied with the final value, observed or calculated, expressing the result of a test or analysis shall be rounded off in accordance with IS 2: 2022 ‘Rules for rounding off numerical values (second revision)’. The number of significant places retained in the rounded off value should be the same as that of the specified value in this standard.

(for comments only)

*Draft Indian Standard*

**ONLINE CONSUMER REVIEWS — PRINCIPLES AND REQUIREMENTS FOR THEIR  
COLLECTION, MODERATION AND PUBLICATION**

**1 SCOPE**

This standard provides requirements and recommendations for the principles and methods for review administrators to apply in their collection, moderation and publication of online consumer reviews.

This standard is applicable to any organization that publishes consumer reviews online, including suppliers/sellers of products and services that collect reviews from their own customers, a third party contracted by the suppliers/sellers or an independent third party. It is recognized that the different processes related to the collection, moderation and publication can at various times be performed by different organizations. This standard is applicable to reviews published online, collected by any methodology.

**2 REFERENCES**

The following standard(s) contain provisions which, through reference in this text, constitute provisions of this standard. At the time of publication, all editions indicated were valid. The standard(s) are subject to revision and parties to agreements based on this standard are encouraged to investigate the possibility of applying the most recent editions of the standards indicated below:

<i>IS No.</i>	<i>Title</i>
IS/ISO/IEC27001:2013	Information technology — Security techniques — Information security management systems — Requirements.

**3 TERMS AND DEFINITIONS**

For the purposes of this standard the following terms and definitions shall apply.

ISO and IEC maintain terminology databases for use in standardization at the following addresses:

- a) ISO Online browsing platform: available at <https://www.iso.org/obp>
- b) IEC Electropedia: available at [http:// www.electropedia.org/](http://www.electropedia.org/)

**3.1 Collection** – Means of obtaining a review related to a consumer experience.

**3.2 Conflict of Interest** – Situation in which a review author has interests connected to the suppliers/sellers, review administrator, product or service that could compromise the independent nature of their review.

**3.3 Consumer** – Member of the general public purchasing or using products or services from a *supplier/seller* (3.20).

**3.4 Consumer Experience Date** – Calendar date and time when the consumer made use of the product or service.

**3.5 Consumer Review** – Recorded information made publicly available by a consumer [deemed to be a *review author* (3.14)] about a specified product or service provided or sold by a *supplier/seller* (3.20).

**3.6 Flagging** – Function enabling consumers or *suppliers/sellers* (3.20) to draw the attention

of the review administrator to any content deemed suspicious.

**3.7 Geolocation** – Process whereby the geographical coordinates (latitude and longitude) of a *review author (3.14)* can be obtained automatically to identify their location.

**3.8 Identification** – Process for obtaining information necessary to confirm the *review author (3.14)* as a real person.

**3.9 Moderation** – Filtering, analysis, or processes conducted automatically or by human means with a view to accept or reject a consumer review.

**3.10 Overall Rating** – Score for a specific product or service, calculated by the *review administrator (3.13)*, that combines all of the individual ratings given by *review authors (3.14)* about that product or service.

**3.11 Process** – Interrelated or interacting activities that transform inputs into outputs.

**3.12 Rating** – Value, classification, or ranking of a product or service by a consumer.

NOTE – To entry:

- a) Rating enables a consumer to give their opinion using a rating scale (0 to 5, 1 to 5, 1 to 10, 1 to 100, A to D, etc.).
- b) This scale may be represented by symbols (smileys, stars, coloured dots, symbols, etc.); however, these symbols should avoid creating confusion with any rating that may exist elsewhere.

**3.13 Review Administrator** – Organization or individual responsible for managing the consumer review content, which may be the suppliers/sellers (3.20) of the products and services being reviewed

NOTE — To entry:

- a) This can be a third party contracted by the suppliers/sellers, or an independent third party.
- b) The different processes related to collection, moderation and publication may at various times be performed by different organizations.

**3.14 Review Author** – Consumer writing a review for publication on the review site.

**3.15 Review Site** – Any platform which publishes consumer/ supplier/seller reviews.

**3.16 Single Sign-On SSO** –Function enabling a user to access a number of websites or applications with a single User ID and password.

**3.17 Solicited Review** – Consumer’s review of a product or service requested by the suppliers/sellers or review administrator.

**3.18 Specific Marking** – Distinctive sign denoting a characteristic of a consumer review.

**3.19 Submission Date** – Moment at which the review is submitted to the review administrator by the consumer.

**3.20 Supplier/ Seller** – Organization or individual providing/selling a product or service being reviewed by consumers on the online review site.

NOTE — Seller/ Supplier: The terms can be used interchangeably

**3.21 Terms And Conditions** – Set of criteria published on the review site that specify the rules with which review authors and suppliers/sellers will comply if they wish to submit information for publication on the review site.

**3.22 Test Reviews** – Method of authenticating the dependability of the review administrator’s processes.

**3.23 Total Rating** – The score given by a review author to sum up their evaluation of a specific product or service.

**3.24 Unsolicited Review** – Consumer’s evaluation of a product or service that is provided without being requested by the suppliers/seller or the review administrator review.

## **4 GUIDING PRINCIPLES AND ORGANIZATIONAL COMMITMENT**

### **4.1 Guiding Principles**

The organization, its review administrator and its staff shall deliver a service that takes the following guiding principles into account at all stages of planning, design and delivery.

- a) *Integrity* – Demonstrates integrity by ensuring that the review site reflects the opinions of legitimate review authors who have acquired a product or service and have submitted reviews
- b) *Accuracy* – Ensures that processes of collecting, moderating and publishing consumer reviews produces reviews that as far as reasonably possible are accurate; that is, adequate, current and not misleading.
- c) *Privacy* – Ensures the protection of review authors’ personal information.
- d) *Security* – Makes certain that all systems have anti-fraud mechanisms in place to protect personal data from internal and external fraud.
- e) *Transparency* – Ensures the organization’s practices on the disclosure of information to consumers, suppliers, personnel and other interested parties regarding online consumer reviews are visible in all its undertakings, decisions and policies. The organization should be transparent about all methodologies, and ownership, that may impact or influence a consumer’s use of the review site.
- f) *Accessibility* – Ensures information on the review site is easy to find and presented in a clear and simple format so that it can be read and understood by consumers and suppliers/sellers.
- g) *Responsiveness* – Responds to communications from consumers, suppliers/sellers and other interested parties concerning its online consumer review site and takes appropriate action without undue delay.

### **4.2 Organizational Commitment**

#### **4.2.1 Culture**

The organization should facilitate a culture that demonstrates commitment to the guiding principles identified in [4.1](#). This commitment should be supported by senior management.

#### **4.2.2 Code of Practice**

The organization shall develop a written code of practice, communicated and made available to all management and staff, which outlines how this standard and the guiding principles in [4.1](#) will be met and maintained. This Code shall be made available to the consumers publicly and at such a place that is easily accessible.

#### **4.2.3 Terms and Conditions**

##### **4.2.3.1 General**

The organization shall develop a written set of terms and conditions that state the rules and criteria

to be complied with for anyone wishing to submit a review.

#### **4.2.3.2** *Accessibility*

These terms and conditions shall be:

- a) easily accessible to all review authors and suppliers/sellers; and
- b) accepted by the review author before submitting a review.

#### **4.2.3.3** *Non-compliance*

It shall be made clear that non-compliance with these terms and conditions may lead to rejection or removal of reviews.

#### **4.2.3.4** *Criteria*

The terms and conditions shall include the following criteria:

- a) The content describes a personal consumer experience of the product or service being reviewed;
- b) All information is factually correct, to the best of the review author's knowledge; and
- c) The content does not contain defamatory language.

Furthermore, the terms and conditions should include the following criteria.

- a) The content is intelligible to readers (e.g. without random characters or the use of sequences of words without meaning);
- b) Any conflicts of interest are clearly disclosed within the review;
- c) The content does not contain personal information that would allow members of the public to identify or contact private individuals (e.g. telephone numbers, precise physical addresses or email addresses);
- d) The content does not contain any financial information (e.g. credit card number, social security number, bank account number) that could result in identity theft;
- e) The content does not contain any marketing materials; and
- f) The review administrator can add to this list. However, it cannot define any additional criteria that could cause bias in the evaluation of the product or service concerned.

### **4.3** **Continual Improvement**

The organization shall continually update and improve the service that it offers. This can be accomplished by:

- a) monitoring consumer and supplier/seller feedback, and responding to that feedback;
- b) continually improving the effectiveness and efficiency of its processes;
- c) reviewing, identifying, considering and applying new concepts and practices into their processes;
- d) encouraging innovation in the development of services and procedures;
- e) providing relevant staff training and personnel development opportunities; and
- f) recognizing examples of outstanding performance and practices related to the process.

## 4.4 Communication Channels

### 4.4.1 General

The organization shall develop effective channels of communication with the suppliers/sellers of products and services reviewed on their site, to share relevant and valuable feedback from review authors.

### 4.4.2 Dedicated Contact Channel for Suppliers/Sellers

The review administrator shall provide a specific clearly communicated contact channel, to allow contact from suppliers/sellers of products and services being reviewed.

NOTE – A contact channel can be a phone number or email address for the specific purpose of supplier enquiries.

### 4.4.3 Providing Feedback to Suppliers/Sellers

The review administrator should contact suppliers of products and services alerting them to any serious safety issues or potential risks highlighted in consumer reviews.

### 4.4.4 Register the Supplier/Seller

The review administrator should offer suppliers/sellers reviewed on its site the opportunity to register a business online profile so that they can receive alerts when new consumer reviews are published.

### 4.4.5 Third Party Managing Reviews

Where a third party is managing reviews on behalf of a supplier/seller, the review administrator should liaise with suppliers/sellers to discuss the best way to share relevant and valuable feedback from review authors which may assist in improving products and services.

## 4.5 Resource Capability

The organization should ensure that it has sufficient resources available for process planning, designing, reviewing, identifying, considering and applying new concepts and practices for continual improvement.

NOTE — Resources can include, but are not limited to IT systems, and the knowledge, training and experience required by the staff that will manage and operate the process.

## 5 THE COLLECTION PROCESS

### 5.1 General

Consumer reviews shall be collected using an objective and demonstrable process (see Fig.1) that minimizes bias and prejudice.

The organization's collection process enables any consumer meeting the terms and conditions (described in [4.2.3](#)) to submit a review.



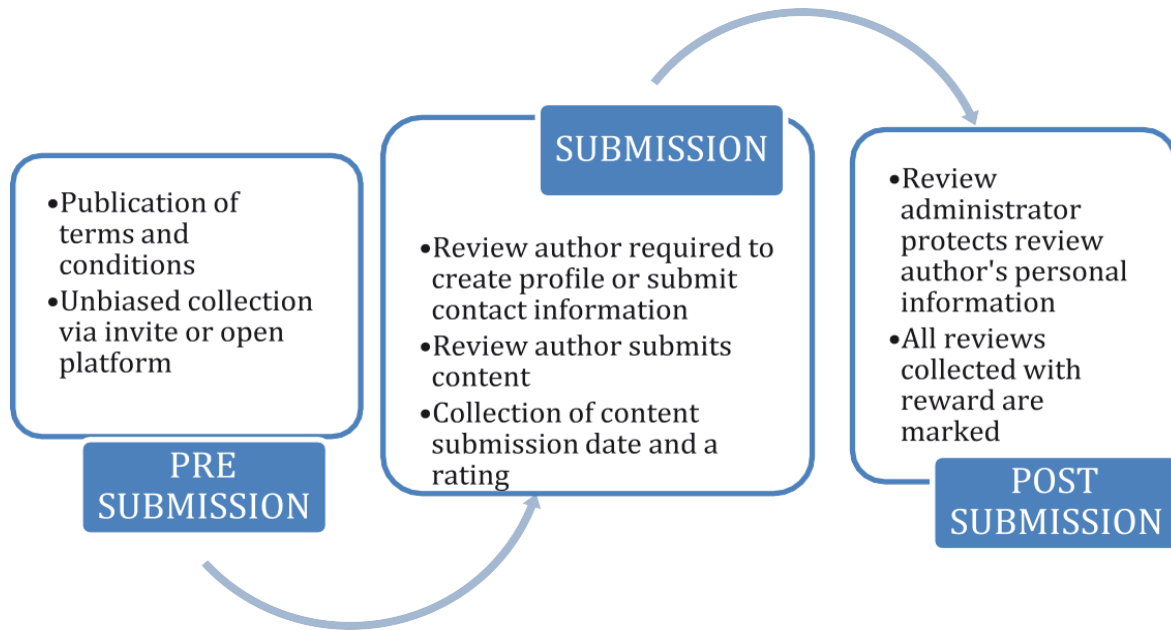


FIG. 1 COLLECTION PROCESS

## 5.2 Responsibilities of Participants

### 5.2.1 The Review Author

All review authors shall be asked, either at the point of registration, or before submitting each review, to:

- confirm that they have read and accepted the review site's terms and conditions; and
- provide an email address or contact telephone number to enable the review administrator to contact them.

Any review author not complying with a) and b) above shall be refused permission to submit a review.

### 5.2.2 The Review Administrator

#### 5.2.2.1 Collecting personal information for profile or nickname

The review author shall be given the opportunity to create an online profile, or nickname to be publicly displayed.

The review administrator may still collect personal information of the review author; however, the review author can choose to remain anonymous on the site, in case of acceptance of terms and conditions, however, the choice may be provided by the review administrator to the review author as per their business model.

#### 5.2.2.2 Safeguarding personal information

The review administrator shall ensure that:

- all personal information collected from consumers is stored and handled in a secure and confidential manner to prevent unauthorized access or use;
- security settings are put in place to protect the consumer's personal information; and
- personal information is used only for the purposes of moderating reviews and is not

transferred to marketing companies, brokers or any other third parties unless the review author has expressly consented to such transfer.

NOTE — Personal information includes information such as an individual's name, address or email address; that is, all information that can be linked to an individual.

### 5.2.2.3 *Training of staff*

The review administrator shall ensure that anyone handling personal information completes training in relation to the guiding principles (4.1).

NOTE — Please refer to the relevant national legislation concerning data protection and ISO/IEC 27001 for further guidance.

## 5.3 Consumer Review Features

The review administrator shall ensure that consumer reviews have the following features:

- a) The date the review was submitted; and
- b) A total rating.

The review administrator should also provide review authors with an opportunity to add:

- a) a description of the consumer experience in free text or questionnaire format;
- b) the date or time period of the consumer experience;
- c) the purchase date of the products and services; and
- d) additional content relating to the consumer experience.

### NOTES

**1** The review administrator can routinely offer users the opportunity to sort reviews based on whether the elements relating to the consumer experience have been obtained.

**2** Additional content can take the form of photographs, videos or audio comments. These are subject to the same rules of moderation as review text.

## 5.4 Solicited Consumer Reviews

### 5.4.1 *General*

Review administrators inviting consumers to submit online reviews should send invitations to all those who are known to have purchased the product or service.

If the invitations are not sent to all those known to have purchased the product or service, it shall be collected using an objective and demonstrable process that minimizes bias and prejudice.

### 5.4.2 *Invitation*

Any solicitation for a review of a product or service sent by the review administrator, or the supplier/seller, should be sent at a time appropriate for the consumer to write a review.

NOTE — For example the terms and conditions can state a specific time frame within which the invitation could be sent following the consumer experience.

The review invitation shall clearly indicate, or give access to, the following information.

- a) Who is soliciting the review:
  - 1) the review administrator or a third party acting on behalf of the review administrator or the supplier/seller; and
  - 2) if the review administrator is the actual supplier/seller, this should also be clear in the review invitation;

b) Details of the product or service for which a review is being sought:

Furthermore, the review invitation should also indicate, or give access to, the following additional information:

- 1) how the review will be used (in particular whether it is intended to be published, and where);
- 2) what content and review author identification information will be published; and
- 3) how to consult the terms and conditions of the review administrator's site.

#### **5.4.3 Invitation Date**

The review administrator shall ensure that the review is not collected before the consumer experience of the product or service.

#### **5.4.4 Multiple Consumers**

If more than one person (for example, a family) has had a consumer experience linked to a single purchase, the review administrator reserves the right to solicit either the purchaser of the product or service, or any of the consumers linked to the purchase.

#### **5.4.5 Use of the Consumer Database**

Verification that the review author is a real person and confirmation of the consumer experience taking place may be obtained from a database belonging to the review administrator, the supplier/seller or its distributor.

NOTE — If the consumer experience cannot be confirmed, the information can be obtained by means of a form, email or other mechanism.

#### **5.4.6 End of Invitations**

The review administrator should no longer send invitations if, at any point, the review administrator learns that the evaluated product or service has been discontinued or is no longer offered by the supplier/seller.

### **5.5 Unsolicited Consumer Reviews**

Any consumer shall be allowed to leave a review on the site provided they:

- a) provide personal information either by registering on the site or creating a profile; and
- b) accept the terms and conditions.

#### **5.5.1 Control of the Identity of Review Authors**

The review administrator shall have a process in place to verify that the review author is a real person and confirm that the contact details provided are genuine and correspond to a real person that may be ensured by the following means:

- a) This may be carried out for a random sample of review authors, or for those it suspects do not meet the terms and conditions or are flagged for further investigation; and
- b) It should be made clear to all review authors when submitting a review that this verification might take place, and the conditions under which it will be performed.

The identity of the review author can be confirmed by one or more of the following methods:

- 1) verifying the email address by sending one or more emails and awaiting a response;
- 2) verifying the review author's domain name and email address extension in comparison with

the online review subject and/or the name of the evaluated product or service;

- 3) sending an email that asks the review author to confirm their registration by clicking on a link;
- 4) verification by a programme that protects websites;
- 5) verification by telephone call or SMS;
- 6) verification of identification by Single Sign-On (SSO);
- 7) verification of identification by geolocation or IP address;
- 8) verification by the review administrator that the review author's email address is valid prior to publishing a first review; and
- 9) verification by using a single user per email address; and verification using the captcha system.

NOTE — Any additional method for verification that is reasonable for establishing the identity as per the prevalent practice may also be used.

### **5.5.2** *Verification of Consumer Experience*

The review administrator shall have a process in place to increase the certainty that the consumer experience was genuine by:

- a) monitoring the content of reviews to ensure that they meet the criteria detailed in the terms and conditions; and
- b) responding to any feedback or complaints about the content of reviews.

The review administrator, if on analysis of the information obtained concerning the review author, discovers elements giving them reason to believe that an item of information is untrue or incorrect, should assess the review internally.

## **5.6** **Minimizing Biased and Fraudulent Reviews**

### **5.6.1** *Purchase of Reviews*

The review administrator shall not knowingly publish reviews that have been purchased and/or written by individuals employed for that purpose by the supplier/seller, or by a third party.

### **5.6.2** *Reviews Collected with Reward*

The review administrator may offer the review author a reward for their review of a product or service, whether this review is unsolicited or solicited. Where the review has been verified then the following shall apply.

- a) The reward shall not depend on the content of the review submitted (e.g. a reward should be given whether the review was positive or negative);
- b) The review administrator shall specify the nature of the opportunity to receive a reward in the terms and conditions;
- c) Rewards can be given before or after a review is submitted; and
- d) The review administrator shall clearly display a “mark” alongside the review to make readers aware that a reward was offered for the review.

#### NOTES

**1** An example of a reward programme could be the “New product tester programme” e.g. some consumers are given or lent new products and provide a review after a period of use.

**2** A reward can take the form of cash or products, or a prize in a competition such as a lottery style draw.

**3** In case of reviews collected with reward, the beneficiaries have to be selected through a non-discriminatory

procedure and in an un-biased manner.

### **5.6.3 Reliability of Collection Process**

The review administrator shall ensure that the following are put in place to ensure collection reliability:

- a) development of filtering and control tools and algorithms;
- b) a verification and control process; and
- c) a process for measuring the reliability of review collection.

## **5.7 Review Questionnaire/Collection Form**

### **5.7.1 General**

The review administrator can, at its discretion, structure an online questionnaire/collection form, or any other mechanism by which it obtains reviews, using the features outlined in [5.3](#).

### **5.7.2 Questionnaire/Collection form Structure**

The review administrator can:

- a) draw up a list of questions on any subject it wishes and is not obliged to restrict itself to a minimum or maximum number of questions or subjects;
- b) structure the questions with multiple choice answers or in plain text; and
- c) provide an opportunity for suppliers/sellers to comment on the questionnaire/collection form.

### **5.7.3 Total Rating of the Product or Service**

The total rating for a product or service should be given by the review author and not be recalculated or modified in any way by the review administrator.

## **6 THE MODERATION PROCESS**

### **6.1 General**

The review administrator shall moderate all submitted consumer reviews against a predetermined, published set of criteria to decide whether they are suitable for publication.

The process (see Fig. 2) allows review administrators to reject or remove reviews if the review fails to meet the terms and conditions.

Moderation can take place before and/or after publication of a consumer review. Moderation may be automatic, manual, or a combination of both.

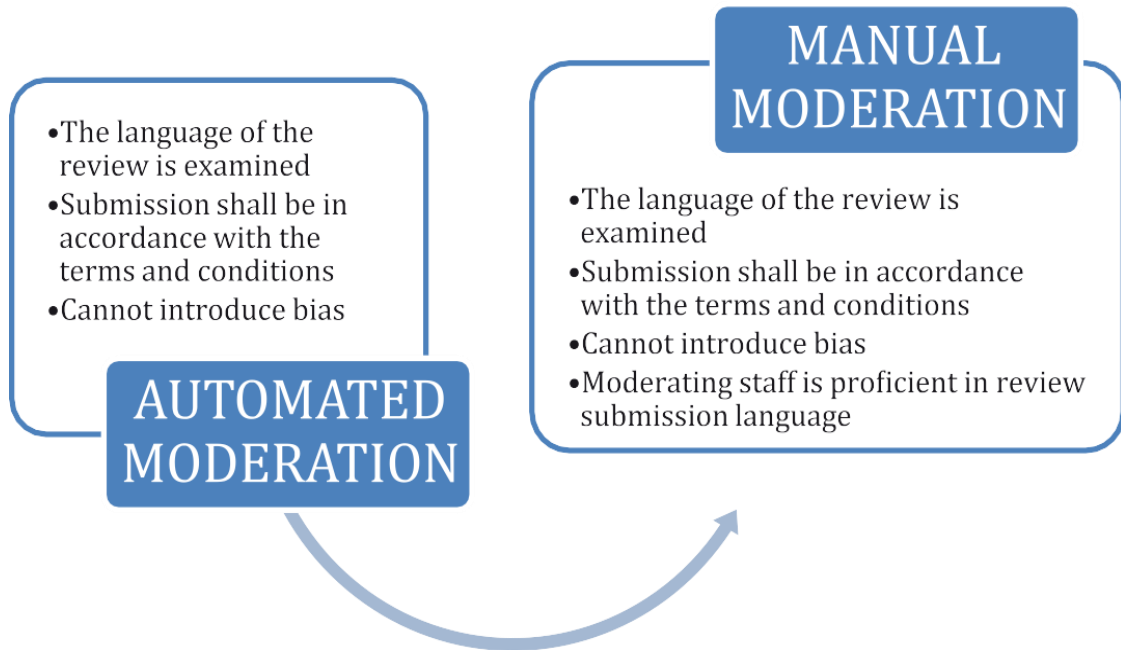


FIG. 2 MODERATION PROCESS

## 6.2 Conditions

The conditions relating to moderation should include, but are not limited to, the following.

- Compliance: ensuring compliance of the collected content with the site's terms and conditions regarding the publishing, rejecting, or removing of content;
- Review author's identity and content: once the review author is identified as a real person, moderating all content submitted;
- Volume of reviews: having in place moderation methods corresponding with the volume of reviews;
- Tracking reviews: ensuring all those involved and their actions connected with moderation are identified and traceable;
- Time limits: applying the same moderation time limit to all reviews;
- Training and support: ensuring staff performing moderation are trained and competent in their role;
- Approach: all reviews receive equal treatment regardless of content; and
- Language: the language of the review is examined.

## 6.3 Staff Moderating Consumer Reviews

### 6.3.1 Staff's Role

Staff assess the content of a consumer review to decide whether it will be published, rejected, or removed.

NOTE — These staff are responsible for following the organization's code of practice and applying the rules within the terms and conditions governing the review author, when moderating consumer reviews.

### 6.3.2 Staff Competencies and Resources

Staff shall have the following competencies and resources:

- proficiency in the language in which the review was written;

- b) access to all the content of the consumer review collected; and
- c) a means to contact the review author if necessary for verification.

NOTE — Notification of this potential contact with the review author can be published in the terms and conditions pursuant to data protection, privacy legislation, and the obligation of those responsible for processing personal information to inform the review author about the purpose of the processing of such data.

Furthermore, staff should have access to:

- 1) all information relating to the history of the review submission (e.g. number of submissions of the same review);
- 2) the history of information relating to the review author (number of reviews published, subject of previous reviews);
- 3) a record keeping system allowing the moderation of a consumer review to be passed to another staff member; and
- 4) all historical reviews ever submitted on a product or service, whether they are accepted or rejected.

#### **6.4 Moderation Characteristics**

Moderation shall be independent of the review content and should only be performed in accordance with the organization's terms and conditions.

The review administrator should indicate in the terms and conditions:

- a) The processing method chosen and applied;
- b) The rules in place within the moderation process; and
- c) The rules that apply to all consumer reviews collected.

#### **6.5 Analysing Review Content**

The review administrator shall have in place processes to analyse and confirm the content collected to ensure its compliance with the terms and conditions.

These processes can combine automated tools and/or manual verification processes.

##### **6.5.1 *Performing the Analysis***

The analysis performed should be based on:

- a) whether the review author is verified as a real person;
- b) review author behaviour (frequency of writing reviews, history of contributions, location, etc.); and
- c) examination of the language used in the review.

##### **6.5.2 *Outcomes of the Analysis***

On the basis of the analysis carried out in [6.5.1](#), the review shall be either:

- a) identified as not containing problematic content; or
- b) identified as fraudulent or containing potentially problematic content (e.g. language) in contravention of the terms and conditions.

NOTE — Reviews reporting the consumer's dissatisfaction with a product or service can be considered but are not deemed as potentially problematic content.

### 6.5.3 Automated Moderation

The review administrator should use dedicated IT programs for analysis within the computer systems used to moderate content:

- a) for the purpose of verifying its appropriate, relevant and impartial character by automated means;
- b) with the creation of tools for data analysis to process any problems as quickly as possible; and
- c) within the computer systems used to monitor content.

#### NOTES

- 1 The moderation process can be partially automated (by a computer program) in particular for:
  - a) filtering (e.g. a specific moderation process or adding an alert flagged to a moderator);
  - b) rejecting consumer reviews containing illicit content or content not meeting the terms and conditions.
- 2 Content types that can be subject to automated moderation are in particular, but not limited to:
  - a) content containing profanity in the text box;
  - b) content containing elements relating to the review author's identity; and
  - c) unintelligible content (e.g. sequence of symbols or characters without meaning, sequence of non-existent words).
- 3 A consumer review can be published without an automated moderation before publication only if a manual moderation has been performed.

### 6.5.4 Manual Moderation

Manual moderation shall be performed by staff competent to moderate the content of the consumer review in order to be able to review and decide on its publication or rejection.

NOTE — A consumer review can be published without a manual moderation only if an automated moderation has been performed.

### 6.5.5 Consumer Review Moderation Time Limit

The organization should aim to complete the moderation process within the time limit stated in the terms and conditions available to the public.

#### NOTES

- 1 The moderation time limit cannot be different depending on its content (positive or negative). It can, however, vary depending on its attributes, e.g. text, form, video, audio, or images.
- 2 The review administrator can inform the review author that their review has been published.

## 6.6 Rejection of a Consumer Review

The review administrator shall reject a consumer review, prior to publication, if:

- a) it is discovered to be fraudulent; and
- b) it does not meet the terms and conditions for publication determined by the review administrator.

## 6.7 Removal of Reviews

### 6.7.1 By the Review Author

If requested by the review author the review administrator shall remove the review.

The review administrator, under the terms and conditions, may place a marker where the review was posted with an explanation, e.g. "This review has been removed by the review author" and



include the date and user identifier.

### **6.7.2** *By the Review Administrator*

The review administrator shall reject and remove a previously approved and published review, if there is information provided that the review author and content did not meet its terms and conditions.

The review administrator, under the terms and conditions, may leave a marker where the review was posted with an explanation, e.g. “This entry did not meet specific review criteria” and include the date and user identifier.

### **6.7.3** *Informing the Review Author*

Where the review submitted is identified as being intended to artificially construct or cause bias in the evaluation of products or services (for example, mass sending of reviews by an online reputation company), the review administrator should inform the review author of its rejection but is not obliged to specify the reasons in order to preserve the effectiveness of its anti-fraud mechanisms.

## **6.8 Editing the Review Content**

The review administrator shall not be permitted to edit consumer reviews at any time. It may allow review authors to edit their own reviews. If so, it shall be done only under the following conditions.

- a) *Before publication* —The review administrator should give the review author the opportunity to edit and resubmit their rejected review if the review administrator believes that the review author has unintentionally breached the terms and conditions.
- b) *After publication* — The review administrator should give the review author the opportunity to resubmit their review even after publication. In this case, the review author.
  - 1) asks for the content to be removed and can then choose to submit a new review in its place,  
or
  - 2) updates the review with a second, amended review that is posted under the original review,  
or
  - 3) edits the already live content (the only content visible after the edit is the new edited content).

The review administrator shall leave a marker where the review is posted with an explanation, e.g. “The review has been edited by the author” and include the date and the user identified.

## **6.9 Assessing the Moderation Process**

### **6.9.1** *Continual Improvement of the Moderation Process*

The review administrator shall have measureable processes in place to assess the ongoing effectiveness of the moderation process. This may include the use of sampling, test reviews or surveys of review authors.

### **6.9.2** *Sampling*

A check should be performed on a statistically representative sample of reviews at least once a year in accordance with the organization’s code of practice and any developed guidelines.

### **6.9.3** *Test Reviews*

To test the quality of the moderation process, and ensure continual improvement, the review administrator should put in place a system of test reviews wherein a pretend review – one that conflicts with at least one of the collection criteria stated in the organization’s terms and conditions – is sent to the moderation process.

The review administrator should put in place a process to ensure that test reviews are removed from the site when the collection and moderation process identifies them as non-compliant.

NOTE — If it is found that test reviews are not flagged at the moderation stage the review administrator can identify, advise and provide retraining to those who failed to flag the test reviews.

#### 6.9.4 *Survey of Review Authors*

The organization should have a process in place for random sampling of a volume of reviews.

##### NOTES

**1** The review administrator might need to contact a random sample of review authors to check their contact details and that their consumer experience occurred.

**2** The review author might be asked to verify their experience by interview with a moderator or by completing a survey.

#### 6.9.5 *Removal of Non-compliant Reviews*

The review administrator shall remove reviews identified as non-compliant.

NOTE — Reviews for which the review authors (contacted during the survey for verification purposes) have not responded to the survey might be subject to monitoring that could result in their removal from the site.

## 7 THE PUBLICATION PROCESS

### 7.1 General

#### 7.1.1 *Considerations for the Review Administrator*

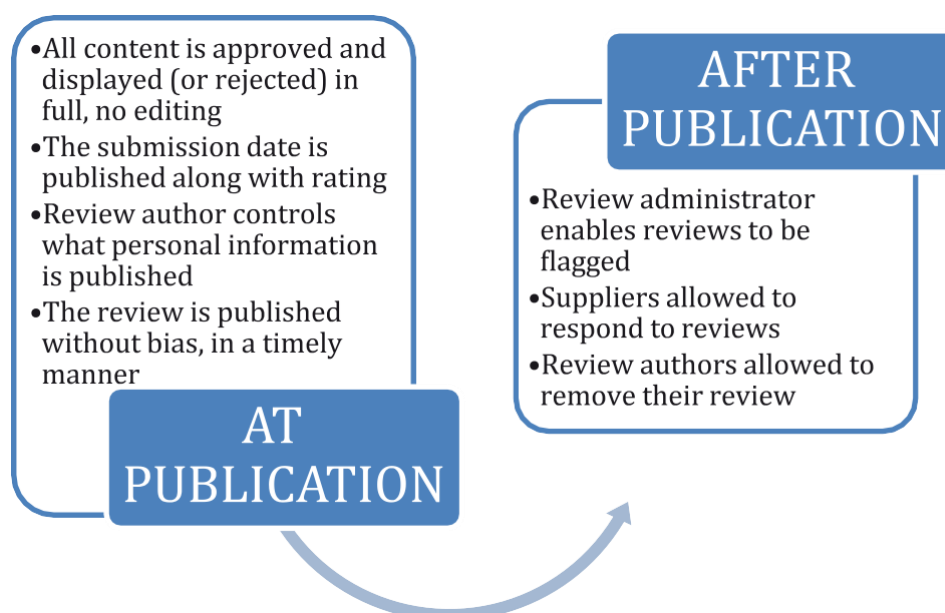


FIG. 3 PUBLICATION PROCESS

The review administrator, in publishing any reviews, should consider the following.

### **7.1.2 Accuracy of the Review**

To ensure transparency and accuracy, the review shall be displayed and published in full with no editing of content by the review administrator.

If an extract from a review is used, it shall include a link to the full review.

If the review is translated to another language, it shall be marked. There shall be a link to the review in the original language.

Where a review author submits a review non-electronically, which is then entered by a review administrator, content shall be marked as transcribed.

### **7.1.3 The default Display**

The review administrator should ensure that the default display of reviews consists of a submission date, so there is a chronological display from the most recent to the oldest based on the submission date.

If a review administrator does not default to a chronological display, they shall clearly indicate what filtering methods are being used for display and make chronological display an option for site users.

NOTE — Overall rating can be included in the default display to show the average of all reviews with a specification of how administrators can display the average rating.

### **7.1.4 The Review Submission and Consumer Experience Date**

The review submission date as collected by the review administrator shall appear next to each review.

The consumer experience date and purchase date, if collected for public display by the review administrator, should also appear in the review.

If a proof of the consumer experience date has been provided by the review author, the review should be marked accordingly. If so, the review administrator should allow the user to filter for proof of the consumer experience date of the reviews.

### **7.1.5 The Profile Information**

The review administrator should separate the profile information (which could be visible by the public) from other information provided by the review author on registration with the review administrator's site. Any personal information should only be accessible to the review administrator and the review author concerned; and

- a) the review author should have control over dissemination of their personal information; and
- b) the default settings should protect the review author's privacy.

## **7.2 Overall Ratings**

The review administrator should combine the total ratings given by individual review authors to create one overall rating for each specific product or service allowing consumers to make easy comparisons between different products or services.

The review administrator shall ensure the following:

- a) calculate the overall rating on the basis of principles of mathematical objectivity;

- b) clearly inform consumers what methods have been used to calculate the overall rating;
- c) the overall rating is continually updated as new reviews are published;
- d) the “user” flagging mechanism does not impact the overall rating calculation until the review in question is removed;
- e) the overall rating for an evaluated product or service is accompanied by the total number of reviews;
- f) reviews collected with rewards are not taken into account while calculating the overall rating of reviews that are without rewards; and
- g) publish a separate overall rating for reviews collected by giving rewards.

### 7.3 Time Limits for Ratings

The overall rating for an evaluated product or service should only take into account ratings in reviews submitted within a specific time period defined by the review administrator.

The review administrator should ensure transparency of the calculation principles for aggregation of ratings:

- a) the review administrator should define the maximum time limit for taking into account ratings for the overall rating calculation if it is shorter than the expiry limit; and
- b) if the expiry limit differs from the time limits for taking into account ratings in the overall rating calculation, these should be clearly stated and be accessible in the terms and conditions.

### 7.4 Ensuring Transparency of the Review Publication Process

The review administrator shall make available on the review site in legible and accessible form, the review publication process (see Figure 3) and any aggregation and weighting methods used.

### 7.5 Conditions and Procedures

In accordance with 7.2, the review administrator shall display, within the terms and conditions, the general conditions and procedures for:

- a) review publication (maximum moderation time limit before publication, review expiry limits, review rejection criteria, etc.);
- b) aggregation of ratings; and
- c) weighting of ratings (e.g. higher weighting for more recent reviews).

### 7.6 Publication Time

Reviews, irrespective of whether they are positive or negative, should be published as quickly as reasonably possible to eliminate bias in the overall view of a product or service through late publication.

The following should also be taken into consideration:

- a) reviews should be published within 72 h in case of meeting the laid terms and conditions but no longer than one month after submitting; and
- b) publication should not be suspended due to any communication with the supplier/seller of the product or service evaluated.

### 7.7 Flagging a Review Containing Illicit or Inappropriate Content

### *7.7.1 Access to Flagging*

The review administrator shall enable review authors, users, as well as the supplier/seller of the product or service evaluated, to flag with reasons any reviews:

- a) containing illicit content, or inappropriate content (not relating to the objective characteristics of the service or product or service evaluated);
- b) clearly demonstrating recognized intent to harm the reputation of the product or service evaluated with the purpose of obtaining a financial or other reward; and
- c) contravening the site's terms and conditions.

### *7.7.2 Manual Moderation of a Flagged Review*

The reviews shall be subject to further manual moderation in order to verify their compliance with the terms and conditions. During this further moderation period, flagging:

- a) may lead to the provisional removal of the publication of the review concerned; and
- b) should provide a reasoned response to the person or organization flagging the review.

The review administrator shall, in the case of a review flagged and recognized as illicit or inappropriate after moderation, remove the review.

## **7.8 Right of Response by the Suppliers/Sellers Reviewed**

### *7.8.1 General*

The review administrator should allow suppliers/sellers the right to respond to consumer reviews published on the site for the purpose of:

- a) giving their version of events (with the opportunity to submit supporting documents);
- b) thanking the review author for their contribution; and
- c) indicating any changes made to the product or service since the review was written.

The review administrator ensures a process is in place to check that the response author is an authorized representative of the supplier/seller.

### *7.8.2 Moderating the Supplier's Response*

The supplier's/seller's response should be moderated by the review administrator under the same processes and criteria as for consumer reviews, in accordance with the terms and conditions.

### *7.8.3 Publishing the Supplier's/Seller's Response*

The supplier's/seller's response should be published under the review concerned without undue delay. The right of response should be granted free of charge to the supplier/seller for as long as the review is online. The responses should be flagged and removed in the same way as a review.

## **7.9 Criteria for Removal of Reviews After Publication**

### *7.9.1 General*

The principles and rules for removal of reviews, see also [6.7](#), shall be clearly stated in the terms and conditions.

### **7.9.2** *Request by a Review Author*

The review administrator shall allow a review author the opportunity to remove their review from the site at their request.

The review administrator should retain personal information for a period not exceeding the time necessary for the purposes for which it was collected in accordance with the terms and conditions.

The review administrator should take into account the statutory obligations regarding removal linked to the maximum retention time for files containing personal data.

### **7.9.3** *Time Limits Related to Removal*

#### **7.9.3.1** *General*

The review administrator shall specify the expiry limit at which time the review will be removed from publication.

NOTE — This time limit can vary depending on categories of products and services.

#### **7.9.3.2** *Expiry limits*

The expiry limits defined by the review administrator shall be clearly explained and accessible via the terms and conditions.

#### **7.9.3.3** *Minimum period*

There is a minimum period of one year within which a review cannot be removed from publication on the initiative of the review administrator.

The review author may withdraw their review during this period when products or services are being taken off the market during the year.

### **7.9.4** *Retention of Records*

The review administrator shall keep a record of all reviews and all documents attached to the reviews that have been removed from the site, as well as the reason for their removal, for a period of at least one year from the removal date.

## **7.10** **Loss of the Right to Submit Reviews**

If illicit comments, contrary to the terms and conditions, are detected, the review administrator shall remove the review. Previous reviews from the review author should be examined to determine whether removal is warranted.

The review author's user account profile can also be removed from the site.

## **7.11** **Fraudulent Reviews**

If a review about a product or service is proven to be fraudulent, the review administrator shall take timely and appropriate action to:

- a) remove the review from the site;

NOTE — The review administrator can mark where the review was (keeping the user name and date) with a reason why the review was removed, e.g. suspicious review.

- b) review internal anti-fraud mechanisms and make any necessary improvements;
- c) review internal moderation processes and make any necessary improvements; and

- d) prevent the review author from having future reviews published if the review administrator determines doing so is appropriate under the circumstances.

#### **7.12 Publication of Reviews from Another Review Site**

In the event that a review administrator publishes reviews from another review site that complies with the requirements of its terms and conditions, it can clearly distinguish the reviews coming from the other review site.

For all reviews, the review administrator follows all the requirements regarding the display of a review, including those for reviews coming from another review website.