

Claim Support Model - Guidelines

Guidelines to Advertisers for the preparation of Copy Support Dossiers and data based claim support

Background:

1.1 The overall aim is to improve the efficiency of the copy clearance process for Advertisers. The advertiser's ultimate aim is to put copy on air and promote their products. Therefore, it is not unreasonable for the Advertiser to expect a fast and efficient process from Clearcast that will allow them to meet commercial timings and promote their products. Consequently, it is important that the Advertiser and Clearcast work together to increase the efficiency of the clearance process.

1.2 All copy material proposed for broadcast advertising must be submitted to Clearcast for pre-clearance. The Copy and its accompanying information, forms the Copy Support Dossier.

1.3 The preferable method of submission is electronically via [CopyCentral](#), Clearcast's online system. This instantly places the copy dossier into the electronic processing system and obviates the need for an additional, manual, input step.

1.4 All claims made within the copy must be substantiated. The information and/or data proposed as substantiation for claims should be submitted as a component of the Copy Support Dossier.

1.5 Certain statements or claims may not need additional data to substantiate the claim. The claims must be listed along with a simple statement defining why no data is required to support the claim.

1.6 The advertisers should comply with the advertising code and use the code to obtain definitions and descriptors of the support required for certain statements e.g. new or unique.

1.7 Advertisers are expected to provide clear, unequivocal evidence of claim substantiation thus allowing Clearcast to make prompt decisions on the acceptability of the proposed copy for broadcast.

1.8 The submission of highly complex and lengthy copy support dossiers containing large amounts of information or data requires detailed, and time consuming interrogation often leading to substantial clarification and re-work.

1.9 The copy clearance process can be significantly aided by Advertisers identifying and presenting the essential data and information supporting specific claim in a clear and concise format.

1.10 To improve the clarity of Copy Support Dossiers, we will introduce a standard Dossier Template to guide Advertiser submissions. This will encompass both the copy submission and claims substantiation.

2.1a The aim of the new **Dossier Template** is for Advertisers to present both the Copy and the Copy substantiation in a clear and concise format to Clearcast and its associated staff. This document comprises the **Copy Support Dossier**.

2.1b Working to a common format ensures that all copy elements are included and claims are clearly identified. Omissions from the dossier are identified early in the process.

2.1c Evidence to substantiate claims is provided in a clear and concise way and relates to each specific claim.

2.1d All Advertisers will use the same format thereby placing the emphasis on a) adherence to advertising codes and b) the quality of the information submitted for claim substantiation.

2.1e Emphasis is placed on, though not limited to, the Advertiser identifying and presenting the principal data supporting a claim and not on the complexity or volume of material supplied.

3. The new **Dossier Template** is composed of **4** main sections as follows:-

1. **Administration**
2. **Copy script and identification of claims**
3. **Substantiation of Claims**
4. **Appendices**

- ***It is anticipated that the advertiser will cover items 1-3 in less than 5 pages***

Each item is detailed below:



Administration - Page 1

Page 1 - Administrative details for the copy submission in table format:

| | |
|-----------------------------------|--|
| Advertiser: | |
| Agency: | |
| Product: | |
| Copy Title: | |
| Advertiser Copy number /reference | |

Advertisers should use an internal reference code that includes the revision number of the copy. Many advertisers will have several scripts for a particular product or brand's advertising campaign. Similarly, a single piece of copy may undergo a number of iterations or complete title changes during the copy clearance procedure. It is important to avoid confusion when scripts are submitted to Clearcast, especially as there may be several copy executions from the same Advertiser or Brand with Clearcast at any one time. Clearcast will continue to allocate all scripts a specific identification and edit number for reference on [CopyCentral](#).

Copy script and identification of claims - Page 2 – (see Appendix 1)

Page 2 lays out all of the copy elements including major visuals, descriptions of visuals, superimpositions, claims, and voice-overs, demonstrations of product action or efficacy etc.

The Copy is presented in a standardised table format using the following headings:-

| Pictures | Visual Description | Audio Script | “Supers” | Claims |
|--|--|--|--|------------------------------|
| Principal or example images from storyboards or completed film. Pictures of product comparisons or test methods etc. | Description of image flow sufficient to understand the image and its context. Where images are not available for column 1, describe to a level sufficient for 3 rd party to visualise | Detail of the script / text accompanying the image. All punctuation must be included | Exact wording of super imposed text and its relation to the accompanying images. | Claims individually numbered |

Substantiation of Claims - Pages 3-5 – (see Appendix 2)

- Pages 3-5 provide the principal information supporting all claims within the copy submission. The aim is to present the most important and relevant information in a clear and concise way to aid Clearcast and its consultants.
- All claims will be assessed against the current advertising codes by Clearcast.
- All claims and data must be appropriate and sufficient, respectively, to withstand 3rd party challenge e.g. competitive advertisers, related experts, and the general public.
- Claim substantiation data may be sent to a Clearcast consultant for an expert opinion on its quality and acceptability. The consultant will view this, in conjunction with the appendices, with a number of questions in mind including, but not limited to, the following:-
 - Has the correct information / data been provided?
 - Has the methodology to collect the data been validated?
 - Do the data and / or methodology agree with current science?
 - Do the data support the claim?
 - Will the data withstand challenge by other experts?
- Advertisers are not prevented from submitting information and documentation to substantiate claims. The intent is to focus on the important information without the need, unless required, to read every item attached to the Copy Support Dossier.
- Claim substantiation must be presented for claims in the order they appear in the copy.
- All claims statements must be identified including those often termed as “puffery” or “not requiring data”. The judgement of sufficient data is at the discretion of Clearcast.
- All claims will require a data based rationale as support OR sufficient explanation why data is not presented as support. Data is used in the broadest sense and may be numerical, text, pictorial etc.
- Each numbered claim from page 2 forms a new section or paragraph on pages 3-5. Where the same material is used to substantiate more than one claim the material need not be repeated but should be clearly referenced.
- Only the information or data specific to substantiating the claim is presented in this section. Where necessary, a brief description of how these data were obtained may also be included. A clear difference is drawn between the data produced by a clinical trial and the detailed methodology of the trial. The data represents substantiation for the claim whereas the methodology demonstrates how the data is collected. Where product efficacy has been confirmed via a clinical or consumer trial only a brief outline of the trial is required followed by relevant data substantiating efficacy. **The full details of the trial should be included. as an appendix for reference.**
- Similarly, where data has been obtained via a new technique only a brief outline of the method is required in this section. **The full details of the method should be included as an appendix for reference.**
- Include numerical data with base sizes and statistical evaluation, noting the statistical method used and the level of significance obtained.

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- In either this section or a referenced appendix the advertiser should demonstrate at least the following aspects of their data:-
 - Justification of sample set e.g. skin type, laundry stains, age groups, in-vitro substrates etc.
 - Justify sample sizes
 - Product choice
 - Demonstrate the relevance of methods used to collect the data
 - Define methodologies, especially clinical or consumer trials, in vitro experiments etc. sufficient for a 3rd party to understand and interrogate the method.
 - Demonstrate the validity of data presented for support e.g. compiling data from multiple studies conducted at different sites or times; the use of percentage change on non-linear data; combining products with significant formulation differences into one data set etc.
 - Reports from third parties should be explained and contain details of method or clinical validation.
 - The statistical methods used
- Include product comparisons and rationale for the choice of comparative products. Include additional detail (in an appendix) as required to justify the appropriateness of the product choices.
- Include details of product demonstrations sufficient for a 3rd party to understand and full details of the test procedure in accompanying documentation.
- Statements of “claim previously accepted” or similar must be supported with a clear reference, such as clock number, of the previously approved claim. The context of the claim should be outlined. The previously submitted Claim Support Dossier should be made available if requested.
- A reference to an appendix must be clear and numbered.

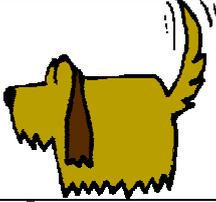
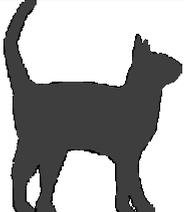
Appendices - page 6 onwards

No limit is set on the amount of additional information provided by the advertiser. However, it should be relevant and provide further support to the claim substantiation already presented in the dossier.

- Appendices allow the advertiser to submit any additional information required for claim substantiation.
- Appendices allow Clearcast and its consultants to understand methods, clinical and consumer trials and scientific explanations.
- Principal data from the appendices should be extracted and presented on pages 3-5 as claim substantiation.
- Where possible, large trial reports should also contain a summary report. Conversely, summary reports without important details of the trial are not sufficient.
- Details of trials used to demonstrate product performance including clinical, consumer, in vitro etc. Reports should include methodologies, recruitment criteria, base sizes, statistical analyses etc.
- Where reports contain coded formulations that are relevant to the claims the codes should be deciphered and linked directly to the product(s) in the script.
- Referenced scientific literature as appropriate. This should include the published article and not simply a journal reference.

Appendix 1

Example of Copy script and identification of claims - Page 2

| Pictures | Description | Script | “Supers” | Claims |
|--|---|--|------------------------------------|--|
|  | Dog rubbing backside on floor with concerned owner looking on | Unique, sensitive, “BoCare” for dogs | | 1. Unique 2. sensitive |
|  | Dog being treated by owner showing product applied as a cream | Relieves those problem days for mans’ best friend | “Voted No.1” by “Dog Day” magazine | 3. Relieves those problem days 4. For man’s best friend. 5. “Voted No.1” by “Dog Day” magazine |
|  | Happy dog wagging tail and greeting owner | No other product is proven to give your dog healthier life | | 6. No other product is proven to give your dog a healthier life |
|  | Cat stroll into room and sidles up to owner | ...and it’s safe for cats too... | | 7. and it’s safe for cats too. “Implied” efficacy on cats as well as dogs. |

Example claim support data:-

Claim 1 “Unique.....”

Data: a) demonstrate that “BoCare” is a unique brand, a unique product in the line, or is a unique formulation for the expected consumer group.

Claim 2 “sensitive...”

Data: the inference for the claim is one of not irritating or not causing discomfort to the animal. The expected support data would include a trial showing the application of the product to dogs with both normal and compromised skin and tested on the appropriate skin area.

The trial would need to cover a range of breeds including those typically pre-disposed to the identified problem. It should also include any breeds known to have more sensitive skin.

The technique used to measure “sensitive” must be validated and capable of showing differences between products designed for sensitive skin and normal products.

Statements indicating that the ingredients are non-irritating in other areas etc. would not be acceptable but could be used as additional evidence

Claim 3 “Relieves those problem days...”

Data: a) a definition of “problem days” and a description of what the product is designed to relieve.
b) A trial providing proof that the symptoms leading to problem days have been removed. A trial demonstrating cure or removal of the cause of the symptoms is not sufficient.
c) the trial, or other data, should show that when the symptoms have been removed the dog no longer exhibits the behaviour (as expected by the owner).

Claim 4 “For man’s best friend”

Data: A statement to say this is accepted terminology or phrasing. It is unlikely that additional data would be required.

Claim 5 “voted No.1” by “Dog Day” magazine

Data: a) A referenced document from the magazine showing the test used.
b) A description of the test to show that the product was tested for efficacy and relief of the symptoms described in the advertisement.
c) Details of other products tested showing that all major competition (value or volume shares) had been compared.

Claim 6 “No other product is proven to give your dog a healthy life”

Data: a) Trial data showing measurable changes of “healthier” in the dogs e.g. activity periods, tail wagging, metabolic measures, on a range of breeds.
b) All products designed to target the symptoms and generally available to the public, even though not advertised on TV, must be tested in the trials outlined above.

Claim 7 “..and it’s safe for cats too” (Implied efficacy on cats)

Data: a) safety data for application to cats as well as dogs

b) details of symptoms experienced by cats and trial data, as outlined above, to show efficacy on a range of cat breeds

Appendix 2

Claims, numbered in order as they appear in the copy script. Each claim forms the heading of a new section:

Example:

Claim 1 “Product X is superior to all other products in the category”

Support: (Ref: Appendix I)

- Brief background if needed
- The category contains the following products
- We have tested against ONLY the following products because.....
- Using these tests
- The data shown in the table below shows....

| Product | Base size | Test result | Significance (stats test used) |
|---------|-----------|-------------|-----------------------------------|
| A | | | |
| B | | | |
| C | | | |
| D | | | |

- Conclusion.

Claim 2 The product was rated product of the year for 2009

Support: (Ref: Appendix II)

- Independent data to show product rating
- Tested on relevant consumer base for this advertising
- Number of people tested.
- Endorsement

Claim 3 The product wipes away all stains.....

Support: (Ref: Appendix III)

- How is the demonstration achieved and why is it a fair demonstration?
- Tested in context and reasonable consumer situation.