APMA Compliance Reporting Portal

v.1 June 2026

Reporting and Inclusion Policy

1. Purpose and Role of the APMA

The APMA Compliance Reporting Portal exists to facilitate the sharing of credible information relating to serious misconduct that may undermine trust, transparency and consumer confidence within affiliate and partner marketing.

The APMA's role is limited to receiving reports, reviewing supporting information and determining whether, based on the information available, there are reasonable grounds to share the report with APMA members for awareness and risk management purposes.

The APMA does not:

- Regulate the affiliate and partner marketing industry.
- Undertake formal investigations.
- Determine liability or guilt.
- Establish findings of fact.
- Adjudicate disputes.
- Act as an arbitrator or mediator.
- Compel remedial action.
- Impose sanctions.

The APMA is not a court, regulator, law enforcement body or dispute resolution service.

Publication within the register should not be interpreted as proof that wrongdoing has occurred. Inclusion indicates only that the APMA reasonably believes that sufficient credible information has been provided to justify sharing the matter with members.

The APMA's role is therefore one of facilitation rather than investigation, regulation or adjudication.

2. Scope

The APMA will only consider reports relating to affiliate, publisher or partner marketing businesses where there is credible evidence of serious misconduct.

Examples may include:

- Fraudulent activity.
- Criminal conduct.
- Deliberate consumer deception.
- Large-scale affiliate fraud.
- Cookie stuffing.
- Click injection or forced clicks.
- Malware or unauthorised software installations.
- Deliberate impersonation or brand spoofing.
- Systematic use of fake discount codes intended to mislead consumers.
- Deliberate circumvention of programme terms where there is evidence of repeated or systematic abuse.
- Serious breaches of applicable law or regulation.

3. Matters Outside Scope

The APMA will not generally accept reports relating to:

- Commercial disagreements.
- Contract disputes.
- Payment disputes.
- Commission disputes.
- Programme removals.
- Attribution disagreements.
- Brand bidding disputes.
- Network enforcement decisions.
- Isolated compliance breaches.
- Differences of interpretation regarding programme terms.
- General complaints regarding business practices.
- Allegations unsupported by evidence.
- Matters already subject to litigation.

The APMA will not act as an intermediary between parties, seek to negotiate settlements or otherwise become involved in the resolution of disputes between businesses.

The APMA reserves the right to reject reports where it believes the matter would be more appropriately resolved directly between the parties.

4. Threshold for Inclusion

For an entry to be included within the register:

1. The reporter must genuinely believe that the information provided is accurate.
2. The reporter must confirm that the report is not being submitted maliciously, vexatiously or for anti-competitive purposes.
3. The report must be supported by evidence.
4. The APMA must reasonably believe that there are credible grounds for publication.

The APMA is not required to establish wrongdoing beyond doubt.

The APMA will not seek to determine whether allegations are ultimately true or false. Rather, it will assess whether sufficient credible information has been provided such that it is reasonable to share the matter with members.

The APMA's assessment should not be interpreted as an endorsement of allegations or a finding that misconduct has occurred.

5. Evidence Requirements

Reports should, where possible, include:

- Screenshots.
- URLs.
- Dates and timestamps.
- Technical logs.
- Tracking evidence.
- Copies of relevant communications.
- Network or platform correspondence.
- Consumer complaints.
- Other supporting documentation.

The APMA may request additional information or clarification before considering publication.

Anonymous reports may be considered but will generally be afforded less weight.

6. Review and Moderation Process

All reports will be reviewed by the APMA before publication.

The APMA may:

- Request additional evidence.

- Seek clarification from the reporting party.
- Decline to publish a report.
- Amend wording for clarity, consistency or legal reasons.
- Remove information that cannot be substantiated.
- Seek additional information from relevant networks, platforms or other affected parties.

The APMA reserves absolute discretion regarding publication.

Where appropriate, the APMA may seek advice or technical input from independent third-party specialists, including legal advisers, compliance professionals, networks, platforms or other subject matter experts.

Such consultation may be undertaken solely to assist the APMA in determining whether there are reasonable grounds to share information with members.

The APMA does not undertake formal investigations and does not determine liability, guilt or wrongdoing.

7. Compliance Reporting Process and Indicative Timeframes

The APMA will endeavour to process reports in a timely and consistent manner.

Stage 1: Submission and Initial Assessment

- Reports will normally be acknowledged within five working days.
- The APMA will undertake an initial assessment to determine whether the matter falls within scope and whether sufficient information has been provided.

Stage 2: Evidence Review

- The APMA may request further information from the reporting party.
- Reports lacking sufficient evidence may be rejected or deferred pending additional information.

Stage 3: Publication Decision

- Where sufficient information has been provided, the APMA will ordinarily seek to determine whether publication is appropriate within twenty working days of receiving all relevant information.
- Complex matters may take longer.

Stage 4: Right to Respond

- Where appropriate, the APMA may notify the organisation concerned and invite a response before publication.
- Organisations will ordinarily be given ten working days to provide a response or supporting evidence.

Failure to respond shall not prevent publication where the APMA reasonably believes publication to be justified.

Stage 5: Ongoing Review

- Published entries will remain under periodic review.
- The APMA reserves the right to amend, suspend or remove entries should new information become available.

8. Personal Data, Confidentiality and Data Storage

The APMA Compliance Reporting Portal is intended to facilitate the reporting of businesses, websites and corporate entities rather than individuals.

Reporters should not include personal data relating to the organisation or business being reported unless such information is strictly necessary to understand the nature of the concern.

The APMA does not routinely collect, publish or disclose personal information relating to the subject of a report.

The APMA collects contact details from reporting parties solely for the purposes of:

- Verifying the authenticity of reports.
- Requesting additional information or evidence.
- Preventing malicious or anti-competitive reporting.
- Maintaining an audit trail.
- Managing subsequent reviews.

The identity of the reporting party will be treated as confidential and will not normally be disclosed without the reporter's consent unless required by law.

Where personal information is inadvertently supplied, the APMA reserves the right to redact, anonymise or remove such information prior to publication.

Supporting evidence, correspondence and associated records may be retained by the APMA for evidential, governance and audit purposes in accordance with applicable data protection legislation and the APMA Privacy Policy.

9. Right to Respond, Review and Removal Requests

Any organisation named within the register may:

- Correct factual inaccuracies.
- Submit additional evidence or context.
- Provide a statement in response.

- Notify the APMA that the matter has been resolved.
- Request that an entry be reviewed.

Requests should be submitted in writing together with supporting evidence.

Upon receipt, the APMA may:

- Seek additional information from the reporting party.
- Consult independent third-party specialists.
- Amend the published entry.
- Update the status of the report.
- Temporarily suspend publication whilst further information is considered.
- Remove the entry.

The APMA will endeavour to acknowledge review requests within ten working days and, where reasonably practicable, complete its review within thirty working days of receiving all relevant information.

The APMA's decision following review shall be final.

The APMA reserves the right to remove entries at any time.