Countique
CONSULTING

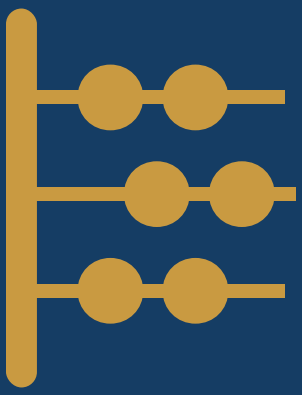
MICRO WHITE PAPER · DIGITAL PRESENCE AND MARKETING

# The Website Is Your First Client Meeting

For a growing share of Australian clients, the first meeting with an adviser now happens on a screen.

The Evidence in Numbers · Australian Law Online · The Thirty-Second Test · A 90-Day Plan

First impressions | Advertising | Online disclosure | Privacy | Accessibility | Testimonials




IN THIS PAPER

Most new clients still come by referral. Yet the website is often where a prospect first meets the practice. Research shows visitors judge a site within seconds. This paper sets out what Australian law already asks of an adviser website. It covers restricted titles, online disclosure, privacy, accessibility and testimonials. It gives practices a thirty-second test for the home page, a traffic light check and a 90-day plan.



Johann Maree, Director · October 2026

IN BRIEF

# Why the website is now the first meeting

Most new clients still reach an Australian advice practice by referral. More of them now find or check a practice online, so the website is often the first meeting (1)(2).

The Australian Securities and Investments Commission asked 2,545 Australians what mattered when choosing an adviser. Some 41 per cent named experience, 38 per cent named reputation and 29 per cent named qualifications. People said quality was almost impossible to judge before they got advice. One said they would check an adviser's background on the firm's website. Another, asked how to find an adviser, said: "Google? I really have no idea." (3).

Practices tell the same story. In 2025, 81 per cent named existing clients as a referral source and 45 per cent named accountants. Social media, find-an-adviser sites and online marketing brought new clients to 25 per cent of practices, up from 16 per cent (1). Investment Trends reports that digital tools are changing how Australians first seek advice (2).

A referral sends a prospect to the practice. The website often decides whether they call. In one study, people rated web pages they saw for 50 milliseconds. Their ratings closely matched those made after a longer look of half a second (4). In a study of 2,684 people, the look of a site was the feature they mentioned most when judging trust (5). Many visitors leave a page within 10 to 20 seconds. A site has about 10 seconds to show its value (6). Consumers also know what to check. Moneysmart tells Australians to look up an adviser on the **Financial Advisers Register**. It also tells them to ask for the Financial Services Guide if it is not on the adviser's website (7).

| Metric | Finding | Source |
|---|---|---|
| **Australians naming experience as a top factor in choosing an adviser** | 41 per cent | Australian Securities and Investments Commission, 2019 (3) |
| **Practices citing existing clients as a referral source** | 81 per cent | Adviser Ratings, 2025 (1) |
| **Practices gaining clients through digital channels** | 25 per cent, up from 16 per cent | Adviser Ratings, 2025 (1) |
| **Time needed to judge a web page's visual appeal** | 50 milliseconds | Lindgaard and colleagues, 2006 (4) |
| **Trust comments that mentioned a site's look** | 46.1 per cent | Fogg and colleagues, 2003 (5) |

*Table 1: The evidence in numbers (Australian and international sources).*

**Regulatory note: the website is advertising and disclosure**

The Australian Securities and Investments Commission reissued its advertising guide in June 2026. It covers the promotion of advice services online and on social media (8). Under the *Corporations Act 2001*, only relevant providers may call themselves a financial adviser or financial planner (section 923C). The words independent, impartial and unbiased are also restricted (section 923A) (9)(10). A practice may now publish its Financial Services Guide content on its website instead of handing over the guide (11). Every page is a compliance document as well as a marketing one.

THE AUSTRALIAN CONTEXT

## Australian law already reaches the home page

The June 2026 update to Regulatory Guide 234 dropped the words good practice guidance from its title. It also says a person should review and approve advertising made with artificial intelligence before it goes out (12). Testimonials must be authentic and name the person who gave them. Warnings must be easy to see. A link or a scannable code will not fix a misleading headline (8). The restricted words carry strict conditions. A practice may use them only if it takes no commissions unless they are fully rebated. It must take no gifts or benefits that could sway advice. It must also be free of product limits and conflicts of interest (10).

Disclosure has moved online too. Under the Delivering Better Financial Outcomes reforms, a practice can use **website disclosure information** in place of handing over a Financial Services Guide. The website version must hold everything the guide would. It must be easy to reach, kept up to date and dated. Content behind a password does not count as easy to reach (11). General advice on the site still needs a general advice warning. The warning must be given at the same time and in the same way as the advice (10).

Every enquiry form collects personal information. Australian Privacy Principle 1 calls for a clear and current privacy policy. The Office of the Australian Information Commissioner expects it to be on the website. From 10 December 2026 the policy must also explain decisions made or largely made by computer programs that could seriously affect people (13). A collection notice belongs at or before the point of collection. Less obvious methods, such as cookies, should be disclosed (14). Businesses with turnover of $3 million or less are usually exempt unless an exception applies. Check the position with the licensee (15). Clients care: 84 per cent of Australians wanted more control over how their personal information is collected and used (16).

Accessibility is a legal issue too. Section 24 of the *Disability Discrimination Act 1992* covers the supply of services (17). The Australian Human Rights Commission treats online services as covered. Its advisory notes point to the Web Content Accessibility Guidelines. The Commission said in 2024 that those notes are being updated (18). The current version of the guidelines is 2.2 (19). In 2022, 5.5 million Australians had disability, or 21.4 per cent of the population (20). Complaint handling must also be easy to use, including for people with disability (21).

| Australian law or guidance | Key requirement | Website implication |
|---|---|---|
| **Section 923C** | Restricted titles for relevant providers only | Check every biography and profile |
| **Section 923A** | Independent and similar words restricted | Remove unless every condition holds |
| **Website disclosure information** | Full guide content, easy to reach, current and dated | Publish outside any login |
| **Section 949A** | Warning given in the same way as the advice | Place warnings with articles and tools |
| ***Privacy Act 1988*** | Privacy policy and collection notices | Link the policy; add notices to forms |
| ***Disability Discrimination Act 1992*** | No discrimination in providing services | Build and test to the accessibility guidelines |

*Table 2: Australian legislation and guidance mapped to the adviser website (9)(11)(13)(17).*

THE THIRTY-SECOND TEST

## Five questions the home page must answer

Nielsen Norman Group names four drivers of trust online. The first is design quality. The second is upfront disclosure of costs and policies. The third is content that is complete, correct and current. The fourth is a visible presence on review sites, social media and news (22). The Stanford guidelines for web credibility, drawn from research with more than 4,500 people, add simple rules. Show that a real organisation stands behind the site. Make contact details easy to find. Update content often (23). Assume a visitor gives the home page about 30 seconds. Pages that hold attention for that long often keep visitors for two minutes or more (6).

Australians choose advisers on experience and qualifications, yet find quality hard to judge (3). So give them facts. Link each adviser profile to the Financial Advisers Register (7). Where an article or calculator is general advice, put the warning on the same page (10).

| Question | What to show | Australian link |
|---|---|---|
| 1 **Who do you help?** | A defined client group, such as retirees or business owners | Clear and not misleading (8) |
| 2 **What problems do you solve?** | The real concerns clients bring, in plain language | Clear, concise and effective (11) |
| 3 **How does it work?** | The steps from first meeting to written advice | Best interests duty (9) |
| 4 **What does it cost?** | How fees are set and what is included | Remuneration disclosure (11) |
| 5 **Why trust you?** | Qualifications, register link and complaints details | Easy to use complaints (21) |

*Table 3: The thirty-second test: five questions and what to show.*

> **Practice tip: run the thirty-second test**
>
> Ask someone outside the practice to view the home page on a phone for 30 seconds. Then close it. Ask them who you help, what you do, what it might cost and what to do next. If they cannot answer, the key messages sit too far down the page. Repeat the test using only a keyboard to find accessibility gaps (19).

TRUST AND PROOF

## Proof that builds trust without creating risk

Reviews and testimonials pass trust from current clients to new ones. They also carry risk. Regulatory Guide 234 expects testimonials to be real and named. Ratings and awards must be explained (8). The Australian Competition and Consumer Commission's 2026 guidance on online reviews is a useful benchmark. Fake reviews are against the law. Removing a genuine bad review may mislead. Any reward for a review must apply to good and bad reviews alike and be disclosed (24).

Social media extends the website. The same rules follow it. In the United Kingdom, the Financial Conduct Authority says each social media promotion must comply on its own. Firms are responsible for every promotion they cause to be made (25). Privacy matters here too. A client's name, photo and story are personal information. Most Australians want more control over theirs (16). Record **written consent** before any of them appears online.

| Proof element | Main risk | Safer approach |
|---|---|---|
| **Testimonials** | Not real or not named (8) | Real, named statements with consent |
| **Online reviews** | Removed bad reviews or hidden rewards (24) | Publish a review policy; respond calmly |
| **Awards and ratings** | Grantor or meaning not explained (8) | Name the grantor and any relationship |
| **Social media posts** | Each post must stand alone (25) | Use the website approval process |

*Table 4: Online proof: risks and safer approaches.*

**Practice tip: consent before content**

Before any testimonial, photo or case study goes live, file a signed consent. It should say where the item will appear, for how long and how the client can withdraw it. Keep the original wording with the approval date. If the practice uses a review platform, check that its rules on editing and removing reviews are clearly shown (24).

WARNING SIGNS AND THE PLAN

## Signs the website is losing prospects and a 90-day fix

Most practices cannot see the prospects they lose online. Referred prospects arrive knowing little about the practice. Enquiry forms go quiet. The disclosure material is out of date or behind a login. Nobody can say who approved the home page or when. Digital channels now bring clients to one practice in four (1), so these gaps carry a growing cost. The fix does not need a rebuild. Remove the legal risks first. Then refresh the disclosure and privacy material. Then rewrite the home page and test it. Involve the licensee early and keep a dated register of every approved page.

| Indicator | Green | Amber | Red |
|---|---|---|---|
| **Last compliance review of the website** | Within 3 months | 3 to 12 months | Over 12 months |
| **Website disclosure information online** | Current and dated | Undated | Missing or behind login |
| **Testimonials with recorded consent** | All | Most | Not known |
| **Testers passing the thirty-second test** | 4 of 4 | 2 or 3 of 4 | 1 or none |

*Table 5: Website traffic light model. Thresholds are illustrative and should be set by each practice.*

| Timeline | Action | Legal link |
|---|---|---|
| **Day 1 to 14** | Audit pages for restricted words, titles and testimonials | Sections 923A and 923C |
| **Day 15 to 30** | Publish dated disclosure; add general advice warnings | Part 7.7, section 949A |
| **Day 31 to 45** | Update the privacy policy and form notices | *Privacy Act 1988* |
| **Day 46 to 60** | Rewrite the home page around the five questions | Regulatory Guide 234 |
| **Day 61 to 75** | Test against the accessibility guidelines; publish a complaints page | *Disability Discrimination Act 1992* |
| **Day 76 to 90** | Start a compliance register and quarterly review | Section 912A |

*Table 6: 90-day website action plan (9)(13).*

**The bottom line**

Prospects now meet the website before they meet the adviser. Make that first meeting clear and accurate. Then review it as carefully as any Statement of Advice.

**IMPORTANT INFORMATION**

This micro white paper is published by Countique Consulting for general information and professional development purposes only. It is not financial product advice, legal advice, tax advice or a recommendation. It does not take into account the objectives, financial situation or needs of any person. It refers to Australian law including the *Corporations Act 2001* (Cth), the *Privacy Act 1988* (Cth) and the *Disability Discrimination Act 1992* (Cth). Regulatory positions are stated as at October 2026 and may change. Figures drawn from third-party research reflect the markets, samples and periods studied and may not apply to any particular practice. The traffic light thresholds and action plan are illustrative only. Practices should obtain their own legal and compliance advice and consult their Australian financial services licensee before publishing or changing website content. Reference titles are reproduced as published and all online sources were accessed on 16 October 2026.

© Countique Consulting 2026. All rights reserved. The Countique name and abacus logo are trade marks of Countique Consulting. No part of this publication may be reproduced, stored or distributed in any form without prior written permission.

SOURCES

# References


(1) Adviser Ratings (2025) *2025 Australian Financial Advice Landscape*. Adviser Ratings Pty Ltd, Chart 3.6, p. 59. Available at: https://pro.adviserratings.com.au/docs/2025-Australian-Financial-Advice-Landscape.pdf

(2) Investment Trends (2025) 'Advice confidence rebounds, but nearly 16 million Australians still miss out: Investment Trends 2025 Financial Advice Report', *Adviser Voice*, 28 November. Available at: https://www.adviservoice.com.au/2025/11/investment-trends-2025-financial-advice-report

(3) Australian Securities and Investments Commission (2019) *Financial advice: what consumers really think*. Report 627. Sydney: Australian Securities and Investments Commission. Available at: https://download.asic.gov.au/media/5243978/rep627-published-26-august-2019.pdf

(4) Lindgaard, G., Fernandes, G., Dudek, C. and Brown, J. (2006) 'Attention web designers: you have 50 milliseconds to make a good first impression!', *Behaviour and Information Technology*, 25(2), pp. 115–126. Available at: https://doi.org/10.1080/01449290500330448

(5) Fogg, B.J., Soohoo, C., Danielson, D.R., Marable, L., Stanford, J. and Tauber, E.R. (2003) 'How do users evaluate the credibility of Web sites? A study with over 2,500 participants', in *Proceedings of the 2003 Conference on Designing for User Experiences*. New York: Association for Computing Machinery, pp. 1–15. Available at: https://doi.org/10.1145/997078.997097

(6) Nielsen, J. (2011) *How long do users stay on web pages?* Fremont, California: Nielsen Norman Group. Available at: https://www.nngroup.com/articles/how-long-do-users-stay-on-web-pages/

(7) Australian Securities and Investments Commission (2026) *Choosing a financial adviser*. Moneysmart. Sydney: Australian Securities and Investments Commission. Available at: https://moneysmart.gov.au/financial-advice/choosing-a-financial-adviser

(8) Australian Securities and Investments Commission (2026) *Advertising financial products and services (including credit)*. Regulatory Guide 234, June. Sydney: Australian Securities and Investments Commission. Available at: https://download.asic.gov.au/media/cvcjdpy5/rg234-published-09-june-2026.pdf

(9) Commonwealth of Australia (2001) *Corporations Act 2001* (Cth), sections 912A, 923A, 923C, 949A and 961B and Parts 7.7 and 7.7A. Canberra: Federal Register of Legislation. Available at: https://www.legislation.gov.au/C2004A00818/latest

(10) Australian Securities and Investments Commission (2024) *AFS licensing: Financial product advisers: Conduct and disclosure*. Regulatory Guide 175, November. Sydney: Australian Securities and Investments Commission. Available at: https://download.asic.gov.au/media/xdyfri0z/rg175-published-21-november-2024.pdf

(11) Australian Securities and Investments Commission (2025) *FAQs: FSGs and website disclosure information*. Information Sheet 291, updated December 2025. Sydney: Australian Securities and Investments Commission. Available at: https://asic.gov.au/regulatory-resources/financial-services/giving-financial-product-advice/faqs-fsgs-and-website-disclosure-information/

(12) Donaghue, E., Nutley, S., Meldrum, J. and Dart, K. (2026) 'ASIC tightens advertising guidance: what financial and credit service providers need to know', *Hall & Wilcox*, 27 August. Available at: https://hallandwilcox.com.au/news/asic-tightens-advertising-guidance-what-financial-and-credit-service-providers-need-to-know/

(13) Office of the Australian Information Commissioner (2026) *Chapter 1: APP 1 Open and transparent management of personal information*. Australian Privacy Principles guidelines, version 2.0. Sydney: Office of the Australian Information Commissioner. Available at: https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-guidelines/chapter-1-app-1-open-and-transparent-management-of-personal-information

(14) Office of the Australian Information Commissioner (2019) *Chapter 5: APP 5 Notification of the collection of personal information*. Australian Privacy Principles guidelines. Sydney: Office of the Australian Information Commissioner. Available at: https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-guidelines/chapter-5-app-5-notification-of-the-collection-of-personal-information

(15) Office of the Australian Information Commissioner (2023) *Small business*. Sydney: Office of the Australian Information Commissioner. Available at: https://www.oaic.gov.au/privacy/privacy-guidance-for-organisations-and-government-agencies/organisations/small-business

(16) Office of the Australian Information Commissioner (2023) *Australian Community Attitudes to Privacy Survey 2023*. Prepared by Lonergan Research. Sydney: Office of the Australian Information Commissioner. Available at: https://www.oaic.gov.au/engage-with-us/research-and-training-resources/research/australian-community-attitudes-to-privacy-survey/australian-community-attitudes-to-privacy-survey-2023

(17) Commonwealth of Australia (1992) *Disability Discrimination Act 1992* (Cth), section 24. Canberra: Federal Register of Legislation. Available at: https://www.legislation.gov.au/C2004A04426/latest

(18) Australian Human Rights Commission (2014) *World Wide Web Access: Disability Discrimination Act Advisory Notes*, version 4.1. Sydney: Australian Human Rights Commission. Available at: https://humanrights.gov.au/our-work/disability-rights/world-wide-web-access-disability-discrimination-act-advisory-notes-ver-41-2014

(19) World Wide Web Consortium (2024) *Web Content Accessibility Guidelines (WCAG) 2.2*. World Wide Web Consortium Recommendation, 12 December. Available at: https://www.w3.org/TR/WCAG22/

(20) Australian Bureau of Statistics (2024) *Disability, Ageing and Carers, Australia: Summary of Findings, 2022*. Canberra: Australian Bureau of Statistics. Available at: https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release

(21) Australian Securities and Investments Commission (2021) *Internal dispute resolution*. Regulatory Guide 271. Sydney: Australian Securities and Investments Commission. Available at: https://download.asic.gov.au/media/3olo5aq5/rg271-published-2-september-2021.pdf

(22) Harley, A. (2016) *Trustworthiness in web design: 4 credibility factors*. Fremont, California: Nielsen Norman Group. Available at: https://www.nngroup.com/articles/trustworthy-design/

(23) Fogg, B.J. (2002) *Stanford guidelines for web credibility*. Stanford, California: Stanford Persuasive Technology Lab. Available at: https://credibility.stanford.edu/guidelines/index.html

(24) Australian Competition and Consumer Commission (2026) *Online reviews for product and services*, 15 July. Canberra: Australian Competition and Consumer Commission. Available at: https://www.accc.gov.au/business/advertising-and-promotions/online-reviews-for-product-and-services

(25) Financial Conduct Authority (2024) *Finalised guidance on financial promotions on social media*. FG24/1, March. London: Financial Conduct Authority. Available at: https://www.fca.org.uk/publication/finalised-guidance/fg24-1.pdf