Protecting Children in Mixed-age Online Media

Targeting Age-restricted Ads Away from Children

An ASA Monitoring and Enforcement Report

Contents

Summary

This monitoring and enforcement project breaks new ground through its twin focus on **dynamically served age-restricted ads** and non-logged-in **mixed-age media**, where adults comprise 75%-90% of the overall audience.[1]

These are technically safe media environments in which to place age-restricted ads (for gambling, alcohol, HFSS etc.) given their heavily-weighted adult audience. However, to support the regulatory objective to minimise children's exposure to these ads, advertisers are advised to use audience targeting tools to dynamically serve their age-restricted ads away from the minority child audience.

This project makes world-leading use of Avatar technology to assess whether, in line with CAP Guidance on Age-restricted Ads Online[2], marketers of age-restricted ads are successfully targeting their dynamically-served ads away from Child Avatars. The Avatars act as laboratory proxies for their respective online audiences, although their automated actions during the monitoring are obviously not indicative of real-world online behaviour.[3]

Over a three week period in 2020, the ASA identified 248 Gambling ad impressions and 182 HFSS ad impressions served to our six Avatars. (Extraordinarily, we identified no alcohol ads over the monitoring period.)

The numbers are too small to extrapolate wider advertiser behaviour, but they provide a valuable time-bound snapshot of ad targeting approaches used and ad delivery outcomes observed against the provisions of CAP Guidance.

Although the focus of the project was on Mixed-Age Media, the monitoring sample also included a small number of Children's and Adult media sites for control purposes. In terms of **media targeting**, we found that HFSS and Gambling advertisers were mostly successful in targeting their dynamically-served ads away from children's media, to sites heavily weighted to adults (where adults comprise 75% or more of the audience).

However, in terms of **audience targeting**, we found that HFSS and Gambling ads were generally distributed evenly to Adult and Child Avatars within these environments. The distribution of dynamically-served ads did not obviously skew towards Adult Avatars and away from the Child Avatars as envisaged by CAP Guidance.

The ads served to Child Avatars in Mixed-Age Media (where 75%-90% of the audience are adults) do not represent clear breaches of the current CAP Code rules. Ads served to Child Avatars may not be representative of real-world ad exposures to children, though individual instances could be indicative of wider issues with the audience targeting approaches used by advertisers. The broadly even distribution of age-restricted ads to Adult and Child Avatars is arguably at variance with the regulatory objective to minimise children's exposure to age restricted ads, including in environments heavily weighted to adults.

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[1] All audience figures in the report are based on data from ComScore which, throughout 2020, was the provider of UKOM-endorsed industry standard online audience measurement data in the UK.
[2] *Age-restricted ads online*; Advertising guidance; 19 Jan 2021
https://www.asa.org.uk/resource/children-age-restricted-ads-online.html
[3] Detailed information on the Avatar approach is provided in Appendix 1: Monitoring Methodology.

The Report concludes by calling on marketers to make better use of **audience and media targeting tools** to minimise children's exposure to dynamically served age-restricted ads. And, it calls on third parties involved in the distribution of these ads to ensure the data and modelling on which these tools rely are as accurate and effective as they can be.

It is anticipated the report may trigger the exploration of more prescriptive regulatory measures relating to dynamically-served age-restricted ads with the aim to further limit children's exposure to such ads in online media.

N.B. Since the monitoring was conducted, the UK Government announced plans to introduce new restrictions on the advertising of HFSS products online and on television, due to take effect in 2023.[4] The new HFSS policy does not alter the context of CAP's expectations regarding targeting of online ads for other restricted products – alcohol, gambling etc. – and it should be noted that HFSS advertisers exempt from certain aspects of the planned policy[5] will still need to give consideration to CAP's guidance in this area.

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[4] *New advertising rules to help tackle childhood obesity*; 24 June 2021
https://www.gov.uk/government/news/new-advertising-rules-to-help-tackle-childhood-obesity
[5] The government announcement in June 2021 indicates small and medium sized businesses (those with less than 250 employees) will not be subject to the restrictions on advertising HFSS products in online media.
https://www.gov.uk/government/news/new-advertising-rules-to-help-tackle-childhood-obesity

Project Purpose and Key Findings

This monitoring and enforcement project is different, in two main ways, to the project we reported on in June 2019.[6] That report looked at age-restricted ads in non-logged-in 'children's media', where children make up 25% or more of the overall audience. Age-restricted ads appearing in children's media are clear breaches of the CAP Code.

The monitoring underpinning this project was principally focused on:

- Non-logged-in **Mixed-Age Online Media** comprising websites and YouTube channels that attract a proportionally high adult audience (75%-90% of the total audience), but include a significant audience of under-18s (10-25% of the sites' audience); and
- **Dynamically served age-restricted ads**, which enable advertisers to target subsets of the sites' audience based on data known or inferred about them e.g. their age, location, online browsing interests etc.

'All audience' age-restricted ads in mixed-age online media

Serving an ad for an age-restricted product to a child profile on a Mixed-Age site is not a definitive breach of the CAP Code. Under the Code, age-restricted ads for alcohol, gambling etc. directed at all of an online audience are allowed to be served in media where adults comprise 75% or more of the overall audience.[7] The ASA has extensive experience applying such restrictions, banning ads where the advertiser is unable to provide robust evidence that adults comprise at least 75% of a site's audience.

This policy of allowing 'all audience' age-restricted ads to be served in media attracting a heavily-weighted adult audience is not unique to online environments. It extends to all broadcast and non-broadcast advertising media, including TV, radio, cinema, outdoor media, print and other 'one-to-many' media.

Dynamically-served age-restricted ads in mixed-age online media

A range of online ad tools enable advertisers to 'dynamically' target subsets of an audience based on data known or inferred about them e.g. age, location, online browsing interests etc. These are sometimes referred to as 'addressable' ads.

The regulatory status of addressable ads in online media where adults comprise 75% or more of the audience is less well developed. Whilst the advertiser is placing their age-restricted ad in a technically safe environment (i.e. one heavily weighted to adults) audience targeting tools could allow the advertiser to dynamically serve those ads *away* from the limited child audience, minimising children's exposure to these ads.

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[6] *ASA monitoring report on HFSS ads appearing around children's media* 06 Jun 2019
 https://www.asa.org.uk/resource/asa-monitoring-report-on-hfss-ads-appearing-around-children-s-media.html
[7] The ads are additionally subject to strict rules that ensure the creative content of the ads does not engage people under 16/18 or others who are particularly vulnerable to the underlying product.

Whilst the Avatar profiles mimic those of internet users of different ages, including child internet users, the monitoring exercise, which involved each Avatar visiting 250 web pages on both desktop and mobile devices, twice a day, is obviously <u>not</u> reflective of children's actual day-to-day browsing behaviour.[8]

CAP's guidance on Age-restricted Ads Online[9], clarifies that marketers of dynamically served age-restricted ads should:

- use media- and audience-targeting tools to target their ads *away* from groups aged under 16/18 (depending on the nature of the product advertised); and
- exercise special care where no data is available regarding the age of a user.

To date, however, the ASA has relatively little experience applying these restrictions in Mixed-Age Online Media, where 75% or more of the audience are adult. This report signals a step change in regulation of dynamically served age-restricted ads in such environments.

The Report

This Report assesses whether ads for gambling and high fat, salt, or sugar (HFSS) products, identified in the monitoring, were targeted in line with CAP Guidance on Age-restricted Ads Online. It focuses on non-logged-in Mixed-Age online spaces, where 75%-90% of the overall audience are adults and 10%-25% are children.

Specifically, we monitored whether the ads were being delivered:

- **AWAY** from Child and Neutral Avatars, which are respectively created as proxies for audiences younger than 16/18 and audiences where insufficient data is available to establish the user's likely age; and.
- **TO** Adult Avatars, which are created as proxies for adult audiences aged 18+.

We did not expect the data to show (and existing guidance does not require) age-restricted ads being served <u>only</u> to Adult Avatars and <u>never</u> to Child and Neutral Avatars. This is the result of a range of factors, including potential deficiencies in advertisers' and agencies' knowledge and application of audience and media targeting tools; and, potential imperfections in the data and modelling underlying those tools.

However, the ASA did expect to see a marked contrast in the proportion and number of age-restricted ads served to these Avatars, with a demonstrable skew towards the Adult Avatars and away from the Child and Neutral Avatars, as envisaged by CAP's Guidance. In many cases, however, that contrast was not sufficiently evident.

It is worth reiterating that, as the Avatars are not intended to replicate the behaviour of specific age groups, individual instances of restricted ads served to Child Avatars cannot be treated as clear indicators of wider exposure to real-world users.

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[8] This information is provided to allow the reader to understand the figures presented in this report in context and explains why it is not reasonable to extrapolate daily, weekly, monthly etc. advertising exposure levels from the data. Detailed information on the methodology is provided in Appendix 1.
[9] *Age-restricted ads online*; Advertising guidance; 19 Jan 2021
https://www.asa.org.uk/resource/children-age-restricted-ads-online.html

This report may provide the basis for the exploration of a more clearly defined and prescriptive regulatory regime relating to dynamically-served age-restricted ads to further limit children's exposure in online media.

The ASA calls on marketers of age-restricted products to make better use of audience and media targeting tools to minimise children's exposure to dynamically-served age-restricted ads in all environments where such technology is available. We also call on third parties in the online advertising sector to ensure the data and modelling on which these tools rely are as accurate and effective as they can be to support advertisers in minimising children's exposure to age-restricted ads online.

Sample Size

- The numbers of ad impressions for high fat, salt, or sugar (HFSS) food products (182) and gambling products (248) identified over the monitoring period is relatively small; too small to extrapolate wider Gambling and HFSS advertising trends.

- The data does however allow us to assess the ad targeting approaches used by 9 HFSS and 11 Gambling brands who served ads to Child Avatars in Mixed-Age environments against the provisions of the CAP Guidance on Age-restricted Ads Online.

Media Selection

- The findings indicate HFSS and Gambling advertisers were largely successful in targeting their ads away from children's sites, to sites heavily weighted to adults (where adults comprise 75% or more of the audience).

- Two HFSS advertisers and two Gambling advertisers, however, served ads to sites where considerably more than 25% of the audience are under 16/18; a straightforward breach of the CAP Code.

Audience Selection

- The HFSS and Gambling ads were distributed in broadly similar proportions to Adult and Child Avatars on sites where adults comprise 75% of more of the audience. The distribution of dynamically-served ads did not obviously skew to Adult Avatars and away from the Child Avatars as envisaged by CAP Guidance.

- HFSS and Gambling ads were also served to the Neutral Avatar; a proxy for online audience members who cannot be accurately identified as child or adult in age.

- Discernibly more HFSS ads were served to the Neutral Avatar than the Child and Adult Avatars whilst discernibly fewer Gambling ads were served to the Neutral Avatar. This may indicate a conscious attempt on the part of gambling advertisers to avoid this 'age-unknown' audience subset.

- These outcomes appear to be at variance with CAP Guidance on Age-restricted Ads Online, which advises how advertisers can target dynamically served age-restricted ads away from child audiences.

Introduction: the basics

The Regulator

The Advertising Standards Authority (the ASA) is the UK's independent advertising regulator. We have administered The UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (written and maintained by the Committee of Advertising Practice) for 59 years and The UK Code of Broadcast Advertising (written and maintained by the Broadcast Committee of Advertising Practice) for 17 years. We are responsible for ensuring that advertising is legal, decent, honest and truthful.

The Advertising Codes

The Advertising Codes establish rules to prevent ads from misleading, harming or seriously offending their audience. They include rules to protect people who are vulnerable because of their particular circumstances and/or because, like children, they share certain characteristics – age, credulity etc. The Codes define children as those aged 15 and under and young people as those aged 16 and 17. Code rules on scheduling and placement of ads aim to ensure children and young people's exposure to certain ad categories – Alcohol; Gambling; foods and soft drinks high in fat, salt, or sugar (HFSS) – is appropriately limited.

Foods and soft drinks high in fat, salt, or sugar (HFSS)

The rules ban ads for HFSS products in children's media (where 25% or more of the audience are children). Where HFFS ads legitimately appear in media targeting a general audience, the creative content of the ads cannot: condone poor nutritional habits or an unhealthy lifestyle in children; promote pester power; or mislead as to the nutritional or health benefits of the products. Additional creative content restrictions apply to HFSS ads directed through their content at children under 12.

Alcohol and Gambling

Ads for Alcohol and Gambling products are subject to similar restrictions. Such ads cannot appear in media which appeals particularly to under-18s (where 25% or more of the audience are aged 17 or younger). Where they legitimately appear in media predominantly targeting over-18s, the creative content of the ad is subject to a range of restrictions relating to socially responsible consumption of, or engagement with, the products featured, and any persons playing a significant role in such ads must not appeal to under-18s.

The Report

This report focuses on paid-for, dynamically-served online display ads for HFSS and Gambling products in Mixed-Age Online Media, spaces which attract both child and adult audiences. (Alcohol advertising was included in the scope of the project, but, extraordinarily, no ads for alcohol products were identified in the monitoring). It provides an insight into the targeting of, and exposure to, these ads for different age groups of internet users. The report provides indicative information on levels of compliance with CAP Code rules on restricted products but does not provide insight into daily, weekly, monthly etc. levels of exposure for specific audiences.

The ASA places high expectations on marketers of age-restricted products to comply with targeting restrictions designed to limit children's exposure to such ads. Given the scale of the online ad marketplace; the range of delivery mechanisms available; children's use of internet-connected devices; and the relative freedoms many children enjoy online, the ASA would anticipate some anomalies and inadvertent exposures despite the best efforts of advertisers and the third parties that provide data and modelling underlying media and audience targeting tools. The relatively small size of the monitoring sample, in particular when broken down by individual brands and campaigns, means it is not possible to make meaningful inferences regarding the scale of the potential compliance issues identified.

The principal purpose of this project was to gather data about the use of age-related targeting tools in age-restricted addressable ads. This data was then used to identify HFSS and gambling brands (and ad tech companies and platforms on which the ads were served) whose dynamically-targeted ads were found to have been served to Avatars mimicking the online profiles of children. It was hoped engagement with these brands would improve the ASA's understanding of the online display ad market enabling us to better understand and address incidences when age-restricted ads are dynamically served to child audiences.

For the avoidance of doubt, whilst the Avatars mimic the online *profiles* of internet users of different ages, including child internet users, the automated monitoring, which involved each Avatar visiting 250 web pages on both desktop and mobile devices, twice a day, is obviously <u>not</u> reflective of children's or adult's actual day-to-day browsing behaviour.[10] This is important information, which allows the reader to understand the figures presented in this report in context and explains why it is <u>not</u> reasonable to extrapolate exposure levels from the data.

This report follows on from the ASA's first survey of online display ads using Avatars – online profiles which mimic those of internet users of different ages – and automated data capture technology, published in June 2019, based on monitoring conducted in late 2018.[11]

Changes in the methodology for 2020 (underpinning the objectives of this report) and the unique context of the monitoring period (during the first Covid-19 lockdown in the UK) mean it is not appropriate to make direct comparisons with the 2018 data.

The monitoring exercise did not identify clear evidence of HFSS or Gambling advertisers intentionally and actively targeting Child Avatars over other profiles, or serving ads with content which, through use of celebrities or characters popular with children, was directed at children.

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[10] The full list of the URLs in the Media Universe can be found in Appendix 4

[11] *ASA monitoring report on HFSS ads appearing around children's media* 06 Jun 2019
 https://www.asa.org.uk/resource/asa-monitoring-report-on-hfss-ads-appearing-around-children-s-media.html

Advertising of HFSS and Gambling

The UK Code of Non-broadcast Advertising and Direct & Promotional Marketing states:

> *15.18 HFSS product advertisements must not be directed at people under 16 through the selection of media or the context in which they appear. No medium should be used to advertise HFSS products if more than 25% of its audience is under 16 years of age.*

> *16.3.13 [Marketing communications for gambling must not]…be directed at those aged below 18 years (or 16 years for football pools, equal-chance gaming [under a prize gaming permit or at a licensed family entertainment centre], prize gaming [at a non-licensed family entertainment centre or at a travelling fair] or Category D gaming machines) through the selection of media or context in which they appear.*

Use and Purpose of Avatars for Monitoring

Following on from the monitoring conducted in 2018, the ASA again commissioned Advertising Intelligence Ltd, a subsidiary of global marketing and media analytics company Nielsen, to monitor online display ads served to UK consumers. The monitoring exercise used 'Avatars': constructed online profiles which closely mimic the profiles of an internet user in a particular age category.

The six Avatar Profiles were:

Child A (6-7)	Child of 6 or 7 years old
Child B (8-12)	Child between 8 and 12 years old
Teenager[12]	A teenager between 13 and 16 years old
Shared Child & Adult	Profile based on an internet browser used by a parent and a child aged 12 or below
Adult	Profile based on the interests of someone over 18
Neutral	No specific age profile; a 'control' profile

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[12] The Teenager profile includes websites which may interest older teenagers but the balance of sites means the Teenager Avatar should be identified as under-16 and so be considered a Child Avatar in alongside Child A and Child B.

To develop the online age profile of each Avatar, Advertising Intelligence used pre-existing models to create a selection of 20-25 age-specific sites for each Avatar to visit. These sites (for example, sites targeted at or disproportionally popular with teenagers aged 13 to 16) would 'drop cookies' on the respective desktop or mobile browsers of the Avatar, building up an online profile indicative of a younger teenager attracted to such sites.

The six Avatars then visited an online Media Universe of 250 URLs (i.e. online addresses), selected from the most popular sites in the UK, on both desktop and mobile devices twice a day.[13] On each visit the Avatars viewed the main URL and one additional associated page/video on the site/channel.

Though based on a similar approach to the study carried out in 2018, changes in the methodology, intent, and context of the 2020 Avatar monitoring mean direct comparisons with the previous Avatar monitoring would not be appropriate.

The report provides indicative information on compliance with CAP Code rules on advertising of restricted products, but the methodology means the findings cannot be used to extrapolate specific audience exposure levels to these types of ads.

The monitoring does not include all forms of online marketing which may fall under the remit of the CAP Code. For example, Influencer Marketing; Audio Streaming Ads; ads in Apps, and on Social Media, were not considered as part of this report.[14]

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[13] 150 URLs were websites, and 100 were YouTube channels. The full list of the URLs in the Media Universe can be found in Appendix 4

[14] Throughout 2020 the ASA and CAP conducted a number of projects monitoring advertising on Social Media, including a substantial project identifying and removing problem Botox ads on Instagram https://www.asa.org.uk/news/we-re-using-new-technology-to-enforce-botox-ad-ban.html

Overview of Monitoring Findings

Key Findings[15]

Ad Categories

- Gambling and Food and Soft Drinks ads (both HFSS and non-HFSS) made up a significantly smaller proportion of all ads served compared to the 2018 monitoring – 3.0% vs 8.2%. These differences should be considered with regard to variations in both the methodology and context of the 2020 monitoring and so may not be representative of a broader change in the online ad market.

- HFSS ads made up just 31.7% of all Food and Soft Drinks ads identified in the monitoring period.

- No online display ads for Alcohol were identified in the monitoring

Media Selection

- Gambling ads appeared only on websites and not on YouTube channels. However, a significant proportion of the Gambling ads identified (25.8%) were served on websites in the Children's Media category.

- The majority of HFSS ads appeared on YouTube (74.7%), though Adult-oriented websites were also a common location for HFSS ads. 98.4% of HFSS ad impressions appeared in media where adults represented at least 75% of the audience.

Audience Selection

- The small sample size means detailed comparisons between individual Avatars are unlikely to be statistically significant.

- However, it is notable that HFSS ads, which appeared primarily on YouTube, were served considerably more frequently to the Neutral Avatar (which had no indicative age data) than to Avatars with an age profile (whether child or adult), which were served broadly similar numbers of HFSS ads.

- Conversely, Gambling ads, which appeared exclusively on websites, were served in broadly similar numbers to the Avatars with age profiles, but the Neutral Avatar, which had no indicative age data, was served noticeably fewer Gambling ads.

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[15] The findings and wider report must be considered in the context of the methodology underpinning our monitoring exercise. The detailed methodology is provided in Appendix 1.

It is worth repeating that the monitoring exercise was not intended to replicate the online behaviour of adults, children or an 'age unknown' profile. It was simply intended to identify age-restricted ads were delivered to Avatars acting as proxies for such profiles.

The monitoring data represents indicative real-world ad impacts, but the monitoring activity – such as visiting Mumsnet.com multiple times a day, every day, for three weeks – does not replicate the normal online behaviour of a seven-year-old child, for example. As such, the findings cannot be used to extrapolate specific audience exposure levels to such ads.

Of the 27,395 ad impressions recorded against the six Avatars during the monitoring, 3.0% (823) were in the Food & Soft Drinks and Gambling categories. Extraordinarily, the monitoring exercise did not identify any ads for Alcohol products.

248 ads (0.9% of all ads served) were for Gambling products and of the 575 Food & Soft Drink ads, 182 (0.7% of all ads served) were for products High in Fat, Salt, or Sugar (HFSS). It should be reiterated that the period under which the 2020 Avatar monitoring was conducted was not representative, occurring during the early days of the Covid-19 pandemic with a knock-on impact on ad spending and the nature of products advertised.
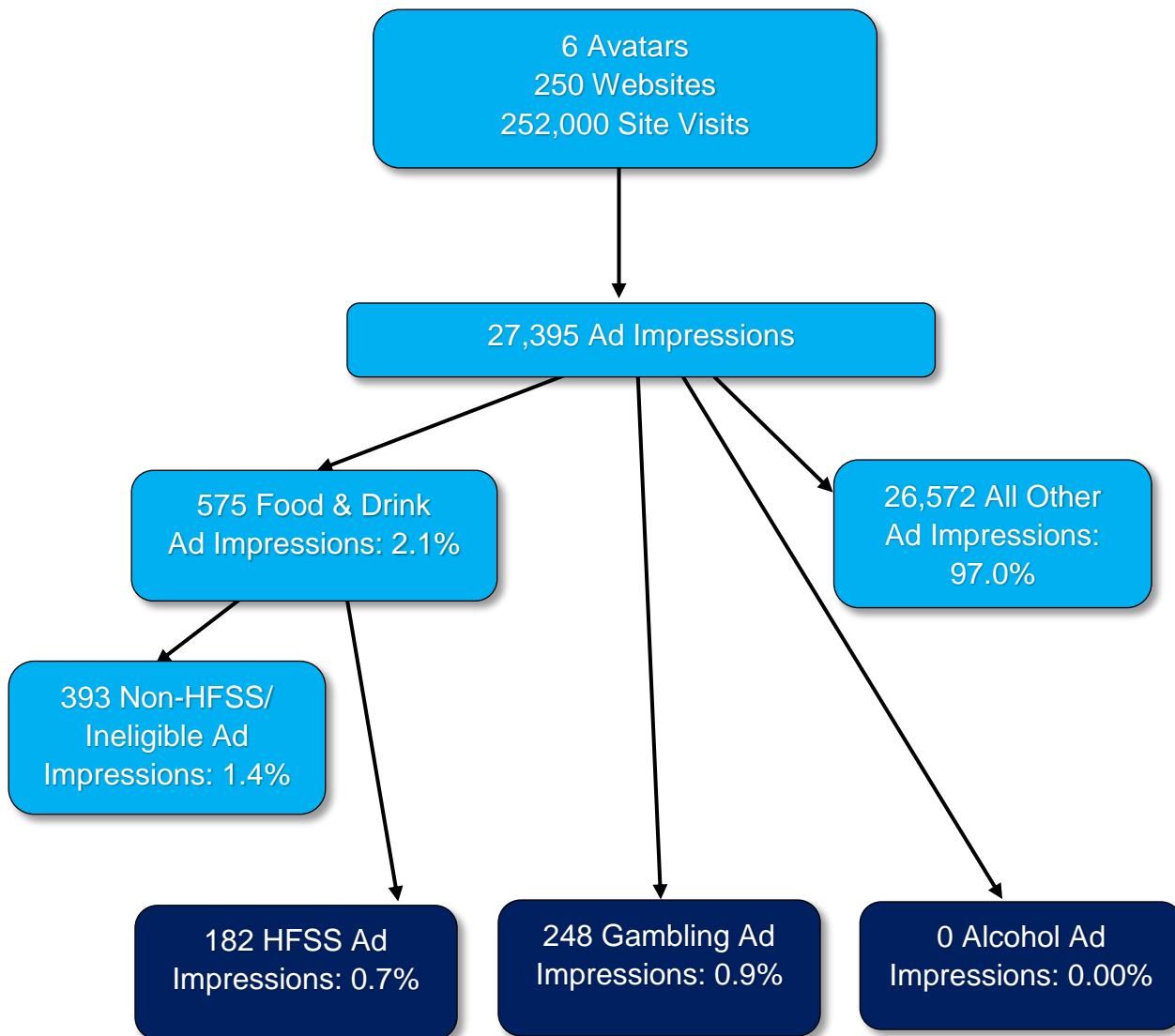
Although the 2020 Avatar monitoring focused on Mixed-Age Online Media, the presence of primarily Child- and Adult-focused websites for control purposes presented some examples of ads for restricted products being served on Children's websites (where more than 25% of the audience are children) representing direct breaches of the CAP Code.

64 Ad impressions were served by 9 Gambling brands on 4 websites in the Children's Media category. The Gambling operators were contacted as part of the project and agreed to take action to ensure ads in future campaigns would no longer appear on such sites.

Problematic serving of HFSS ads to Child Avatars on Children's YouTube channels was a significant finding of the 2018 project, so it is notable that the 2020 monitoring activity found just three clear instances of ads for HFSS products served on YouTube channels with a significant child audience, compared with 490 such ad impressions in the 2018 monitoring. (Again, differences in methodology and context between the two surveys make like-for-like comparisons problematic, but this insight appears encouraging.) The two brands responsible for the three ad impressions were contacted by the Project Team and agreed to amend their advertising approaches in response.[16]

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[16] The two HFSS brands who served ads on YouTube channels in the Children's Media category also served ads in Mixed Age Media and so were informed of the issue and asked to take steps to address the matter within that correspondence.

The chart below show the spread of categories across the 27,395 ad impressions captured during the monitoring exercise:

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                    ┌─────────────────────┐
                    │      6 Avatars      │
                    │    250 Websites     │
                    │  252,000 Site Visits│
                    └──────────┬──────────┘
                               │
                    ┌──────────▼──────────┐
                    │ 27,395 Ad Impressions│
                    └─────────────────────┘
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6 Avatars
250 Websites
252,000 Site Visits

27,395 Ad Impressions

575 Food & Drink Ad Impressions: 2.1%

26,572 All Other Ad Impressions: 97.0%

393 Non-HFSS/ Ineligible Ad Impressions: 1.4%

182 HFSS Ad Impressions: 0.7%

248 Gambling Ad Impressions: 0.9%

0 Alcohol Ad Impressions: 0.00%

NB: The report focuses primarily on ad impressions to gain insights into differences in the volume of ads served to each Avatar. However, at times, specific insights are obtained from analysing the spread of ad impressions for a single unique ad. For example, a unique ad served ten times to the Adult Avatar and once to a Child Avatar may indicate broadly effective age-based targeting with a single anomalous impression to a Child Avatar. However, given the scale and complexity of online advertising, a single inappropriate ad impression served to an Avatar in the monitoring could indicate of a wider pattern which merits further investigation, as outlined in the Enforcement Outcomes section of this report.

HFSS Ad Data

Distribution of HFSS ads served by Media Type and Avatar

Key Findings

Media Selection

- Of the 182 HFSS ad impressions identified in the monitoring, 179 (98.4%) were served on sites where more than 75% of the audience are adults.

- Two of the 29 unique HFSS ads were served a total of three times on YouTube channels where more than 25% of the audience are children; a straightforward breach of the CAP Code.

- It's important to note the monitoring focused on Mixed-Age media (98 websites and 78 YouTube channels), including – as controls – Children's media (13 websites and 13 YouTube channels) and Adult media (32 websites and 16 YouTube channels)

Audience Selection

- Within Mixed-Age audience sites (where 75%-90% of the audience are adult and 10%-25% are children) we would expect advertisers to use audience targeting tools to direct dynamically-served HFSS ads away from children and towards adults.

- There was little evidence of the HFSS ads identified being targeted away from Child Avatars, as required by CAP's Guidance on Age-restricted Ads Online.

- We did not see a marked contrast in the distribution of HFSS ads delivered to the Avatars with indicative age profiles. The HFSS ads were relatively evenly distributed across the Child and Adult Avatars, at variance with CAP guidance.

- The Neutral Avatar – which had no indicative age data i.e. there is no way of knowing if the proxy user is adult or child – was served more HFSS ads than any other Avatar.

The table below shows the distribution of HFSS ads served to Avatars across media types.

		Profile						
		Child A (aged 6-7)	**Child B** (aged 8-12)	**Teenager** (aged 13-16)	**Shared** (child & adult)	**Adult** (aged 18+)	**Neutral** (no specific age profile)	**Total**
Media Type	**Child**	2	0	1	0	0	0	3
	Mixed	15	15	21	14	25	42	132
	Adult	10	5	8	11	3	10	47
	Total	**27**	**20**	**30**	**25**	**28**	**52**	**182**

The numbers of HFSS ads in the monitoring sample (182 impressions of 29 unique ads) is too small to make meaningful extrapolations from the data. The significant differences between the Media Universes and the overall context of the monitoring period mean comparisons with the data from the 2018 monitoring would also not be meaningful.

Media Selection

Two Child Avatars (6-7 years old and 13-16 years old) were served HFSS ads on three occasions on children's YouTube channels, representing 1.6% of the total 182 HFSS ad impressions during the monitoring period. These ad placements represented breaches of CAP Code Rule 15.18. The two advertisers concerned were contacted to address this issue. More details can be found in the Enforcement Outcomes section of the report.

The low proportion of HFSS ad impressions in Children's Media is emphasised by the fact that 12.1% of all ad impressions across the monitoring period appeared in Children's Media. These figures suggest that media restrictions used by advertisers to ensure HFSS ads did not appear on sites with a large child audience were largely successful.

Audience Selection

On Mixed-Age and Adult-orientated sites there was little differentiation in the distribution of HFSS ad impressions between the Avatars with child or adult age profiles. However, across media types, the Neutral Avatar, which had no age profile, was served the most HFSS ads.

Although a lower proportion of HFSS ad impressions were seen in this monitoring period, the high number of ads served to a Neutral Avatar mirrors findings in the 2018 data. A Neutral Avatar has no browsing history to indicate an age profile, either over-16 or under-16. HFSS ad impressions for the Neutral Avatar may suggest advertisers did not use dynamic targeting tools appropriately to ensure HFSS ads were directed away from 'age unknown' users. This might also or alternatively suggest that data and modelling underlying audience targeting tools made available by third parties were not as effective as they could be in minimising 'age unknown' users' exposure to age-restricted ads.

The Shared Avatar, which replicated the browsing behaviour of an adult and child sharing a device, was served only three fewer HFSS ads than the Adult Avatar. Neither the Shared Avatar nor the Adult Avatar were served ads on a Children's website.

Whilst the number of HFSS ad impressions is too low to provide a statistically robust analysis, our monitoring indicated Child Avatars were served HFSS ads in similar numbers to the Shared and Adult avatars, implying limited active targeting on the basis of age profile.

Distribution of HFSS ads by Site Type

Key Findings

Media Selection

- 74.7% of all HFSS ad impressions identified in the monitoring period were served on YouTube, almost exclusively on Mixed-Age YouTube sites (where 75%-90% of the audience are adult and 10%-25% are children)

- 97.8% of the HFSS ad impressions on websites were in the Adult Media category, which attract a negligible child audience.

Audience Selection

- Within Mixed Age audience sites we would expect advertisers to use audience targeting tools to direct dynamically-served HFSS ads away from children and to adults.

- On Mixed-Age YouTube channels, the three Child Avatars were served an average of c17 HFSS ads, while the Neutral Avatar, which has no browsing history to indicate an age profile, was served 42 HFSS ads. These outcomes present evidence of advertisers failing to direct HFSS away from child audiences and potential limitations in attempts to prevent such ads being served to audiences whose age cannot be determined as 16+.

The table below shows how the 182 HFSS ad impressions served were distributed across website and YouTube channels to each Avatar.

| | Profile | | | | | | |
	Child A (aged 6-7)	**Child B** (aged 8-12)	**Teenager** (aged 13-16)	**Shared** (child & adult)	**Adult** (aged 18+)	**Neutral** (no specific age profile)	**Total**
Children's Websites	0	0	0	0	0	0	**0**
Children's YouTube	2	0	1	0	0	0	**3**
Mixed-age Website	1	0	0	0	0	0	**1**
Mixed-age YouTube	14	15	21	14	25	42	**131**
Adult Website	10	5	8	11	3	8	**45**
Adult YouTube	0	0	0	0	0	2	**2**
Total	**27**	**20**	**30**	**25**	**28**	**52**	**182**

Media selection

The clear majority of HFSS ad impressions (136 out of 182) were served on YouTube channels with 131 of these on Mixed-Age YouTube Channels – channels with an under-18 audience of 10-25%. Just one HFSS ad, registering a single impression to the Child A Avatar, was served on a website in the Mixed-Age category.

After Mixed-Age YouTube Channels, Adult-orientated Websites had the highest amount of HFSS ads during the study. 42 of the 45 HFSS ad impressions on Adult Websites were part of a single brand's campaign on the website Mumsnet.com.

Audience selection

On Mixed-Age YouTube channels, Avatars with indicative age data were served broadly similar numbers of HFSS ads. However the Neutral Avatar, which had no browsing history to indicate an age, was served significantly more HFSS ads – 42 in total.

Serving an HFSS ad to a child on a Mixed-Age site is not a definitive breach of the CAP Code, and the sample size of this monitoring project was small. However the higher number of HFSS ads served to the Neutral Avatar suggests that targeting tools used by advertisers were not fully effective in minimising HFSS ad exposure to 'age unknown' audience groups on the YouTube channels monitored.

This might also or alternatively suggest that data and modelling underlying audience targeting tools made available by YouTube were not as effective as they could be in minimising 'age unknown' users' exposure to age-restricted ads.

Distribution of HFSS ads by Category and Avatar

Key Findings

HFSS Product Category

- 89.6% of HFSS ad impressions related to products in categories with potential interest to children – Savoury Snacks and Confectionery & Ice Cream.

- Supermarket ads accounted for less than 3% of all HFSS ad impressions

Audience Selection

- Ads for two brands of Savoury Snack product were responsible for the majority of HFSS ad impressions. There were no significant variations in how these ads were served to Avatars based on age profiles.

- HFSS ads for Confectionery & Ice Cream were most frequently served to the Neutral Avatars, which had no age profile, meaning the recipient could not be clearly identified as an adult or a child.

- These outcomes would appear to be at variance with CAP Guidance, which requires HFSS ads to be targeted away from child audiences.

The table below shows the distribution of HFSS ads served by product category.

	Profile						
	Child A (aged 6-7)	**Child B** (aged 8-12)	**Teenager** (aged 13-16)	**Shared** (child & adult)	**Adult** (aged 18+)	**Neutral** (no specific age profile)	**Total**
Savoury Snacks (products of potential appeal to children)	21	12	26	22	17	21	119
Confectionery & Ice Cream (products of potential appeal to children)	0	7	1	1	8	27	44
Meat (canned or dried)	2	0	1	2	1	1	7
Caffeinated drinks	2	0	1	0	1	2	6
Supermarkets	2	1	1	0	0	0	4
Food delivery service	0	0	0	0	1	1	2
Total	**27**	**20**	**30**	**25**	**28**	**52**	**182**

HFSS Products

The monitoring exercise found 29 unique HFSS product ads which were served 182 times. Most of the HFSS ad impressions (119) were for two brands of Savoury Snack product and appear to have been served to all profiles of Avatar in broadly similar numbers.

HFSS ads for Confectionery & Ice Cream were served more often to the Neutral Avatar, which has no age profile. This suggests the targeting tools used by advertisers were not fully effective in minimising HFSS ad exposure to 'age unknown' audience groups.

HFSS & Non-HFSS balance

Noting public policy concerns to change the nature and balance of food and soft drink ads (from HFSS to non-HFSS) six HFSS ads for caffeinated drinks were served by two brands, compared with eight non-HFSS ads for caffeinated drink from four brands.

Of 136 ad impressions in the Food Delivery Service category, only two were identified as HFSS ads. The majority of the Non-HFSS ads focused on the nature of the service rather than specific foods or were for shopping list applications linked to grocery delivery sites.

Supermarket advertising

Unlike in the 2018 monitoring, when Supermarkets were a major source of HFSS ads, in 2020, only four of the 182 HFSS ad impressions were for Supermarkets. In addition to the four HFSS Supermarket ad impressions, 80 non-HFSS Supermarket ad impressions were identified in the monitoring.

Of the 84 total Supermarket ad impressions, 56 were for ads detailing the response to the Covid-19 pandemic and lockdown across the UK, and would not be considered a normal reflection of the range of ads served in the Supermarket category.

Gambling Ad Data

Distribution of Gambling Ads Served by Media Type and Avatar

Key Findings

Media Selection

- Of the 248 gambling ad impressions, 184 (74.2%) occurred on sites where more than 75% of the audience are adults.

- However, 64 gambling ad impressions (25.8%) from 9 gambling brands were recorded on 4 Children's sites – where more than 25% of the audience are children – a clear breach of the CAP Code. In total, ads in the Children's Media category represented 12.1% of all ads recorded in the monitoring exercise, indicating Gambling ads were in fact more common in Children's Media than in other media categories in the monitoring.

- It's important to note the monitoring focused on Mixed-Age media (98 websites and 78 YouTube channels), including – as controls – Children's media (13 websites and 13 YouTube channels) and Adult media (32 websites and 16 YouTube channels)

Audience Selection

- Within Mixed-Age media (where 75%-90% of the audience are adult and 10%-25% are children) we would expect advertisers to use audience targeting tools to target dynamically-served Gambling ads away from children and towards adults.

- There was little evidence of the Gambling ads identified in our monitoring being dynamically targeted away from Child Avatars, as required by CAP's Guidance.

- We did not see a marked contrast in the distribution of Gambling ads served to Child Avatars and Adult Avatars. Gambling ads were relatively evenly distributed across Avatars; the distribution did not demonstrably skew towards the Adult Avatars and away from Child Avatars as envisaged by CAP's guidance.

- However, the Neutral Avatar, which had no indicative age data i.e. there is no way of knowing if the proxy user is adult or child, was served fewer Gambling ads than any other Avatar. This indicates at least some of the advertisers were successful in minimising Gambling ad exposure to age unknown users.

The table below shows the media categories on which Gambling ads were served:

		Profile						
		Child A (aged 6-7)	**Child B** (aged 8-12)	**Teenager** (aged 13-16)	**Shared** (child & adult)	**Adult** (aged 18+)	**Neutral** (no specific age profile)	**Total**
Media Type	**Child**	13	9	16	12	5	9	**64**
	Mixed	25	25	19	20	31	10	**130**
	Adult	9	5	11	10	10	9	**54**
	Total	**47**	**39**	**46**	**42**	**46**	**28**	**248**

Media Selection

Under the CAP Code, websites and YouTube channels in the Mixed-Age Media category (where 75%-90% of the audience are adult and 10-25% are children) are suitable for 'all audience' Gambling ads; those served to all visitors to the site.

However, given the proportion (and sometimes high volume) of child audience members in the Mixed-Age Media category, Gambling operators are expected to exercise caution to ensure their dynamically-targeted ads are served away from under-18s on these sites.

It should be noted that all the ad impressions in the above table were dynamically-targeted display ads appearing on websites. The monitoring data did not identify any instances of Gambling ads served on YouTube.

The numbers of Gambling ad impressions in the monitoring sample is too small to make meaningful extrapolations. In addition, significant differences between the Media Universes and the overall context of the monitoring period mean comparisons with data from the 2018 monitoring would also not be meaningful.

However, it is concerning that the monitoring identified 64 instances (relating to 47 unique ads, by nine gambling brands) of Gambling ads being served on four Children's websites, representing clear breaches of CAP Code Rule 16.3.13.

The nine Gambling operators who served these ads on Children's websites were contacted by the CAP Compliance Team and agreed to take action to ensure their ads no longer appeared on these sites. The findings were also shared with the Gambling Commission.

As the use of audience data to classify a Children's website was a new and untested approach for the ASA, the CAP Compliance Team sought further detail on this issue with only the two Gambling brands which had served ads on sites where the audience data suggested a substantial under-18 audience – in both cases, quizdiva.net, where the Comscore data indicated over 50% of users were under-18.[17]

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[17] Details of the CAP Compliance Team's work can be found below in the Enforcement Outcomes section.

The 64 Gambling ad impressions on Children's websites represent 25.8% of all Gambling ad impressions in the monitoring. Just 12.1% of ad impressions across the monitoring period appeared in Children's Media, meaning Gambling ads were in fact proportionally <u>more</u> common in Children's Media than in Mixed-Age or Adult media. The figures suggest media restrictions were not used successfully by these advertisers to ensure Gambling ads did not appear on sites with large child audiences. This is a concerning finding.

The inappropriate serving of Gambling ads on these Children's sites could be a result of a range of factors, including:

- Basing media-buying decisions solely on target audience or self-categorisation by a site, rather than incorporating data on actual audience composition;
- Insufficient implementation of the targeting tools available;
- The extent to which, if any, brands or their agencies made use of verification tools to assess the efficacy of a chosen targeting approach

Overall the data provides an indicative picture of the shape of Gambling ad targeting online in the UK, which would seem to show that some gambling operators, and/or the third parties they engage, have more work to do in targeting 18+ audiences only, thereby minimising under-18s' exposure to gambling ads.

Of the 24 individual Gambling brands with ads identified during the monitoring, none appeared to serve ads only on sites in the Children's media category, or only to Child Avatars. However, just seven brands were able to limit their ads entirely to sites in the Adult Media category. This would seem to indicate the cautious use of effective brand safety tools by these seven operators to ensure appropriate media choice.

A further eight Gambling brands served ads only on Mixed Age or Adult Media, meaning they were able to prevent their ads appearing on sites in the Children's Media category, thus avoiding any prima facie breaches of CAP Code Rule 16.3.13.

Audience Selection

Of the 248 Gambling ad impressions identified in the monitoring, a total of 132 were served to Child Avatars. By examining the numbers of ads served to each Avatar it is possible to identify several indicators of systemic or operational inconsistencies with age-based targeting of website users, these include:

- Child A, which represented the profile of a primary school child, was served the most Gambling ads with 47. However nine of those were in Adult Media and 25 on Mixed-Age Media, sites unlikely to attract primary school aged children in real life.
- With the exception of Mixed Age Sites, where the Adult Avatar was served a higher number of Gambling ads, Child Avatars tended to be served a similar or greater number of Gambling ads to the Adult and Neutral Avatars.
- The Neutral Avatar, which had no browsing history to indicate an age profile, was served the fewest Gambling ads overall. This would appear to indicate several Gambling operators used targeting tools effectively in order to minimise gambling ad exposure to 'unknown' age category audience groups.

- Gambling ads were served on 130 occasions to all Avatars on Mixed Age Media by 16 Gambling brands. Of those 16 brands, three were able to avoid serving any ads to the Child Avatars. This seems to indicate advertisers <u>are</u> able to exercise some effective restrictions on ads being served to users who may be known or inferred to be under 18.
- However, all of the 16 brands referenced above served a dynamically-targeted ad to the Neutral Avatar, which had no data indicating the user was clearly over 18. This may suggest the available tools were not used effectively to target only users who could be identified as over 18 and thus minimise under-18s' exposure to gambling ads.

Serving a Gambling ad on a general interest website to an 'age unknown' user does not represent a clear breach of the CAP Code. Similarly, each instance where a Child Avatar is served a dynamically-targeted Gambling ad does not definitively breach current provisions of the CAP Code – the impressions would need to be examined on a case-by-case basis.

However, the monitoring data presents indicators advertisers may be failing to apply all available mechanisms to limit exposure to age-restricted ads in the manner advised by CAP's Guidance.[18] This might also or alternatively suggest that data and modelling underlying audience targeting tools made available by third parties may not be as effective as they could be in minimising the exposure of under-18 users to age-restricted ads.

Just five of the 24 Gambling brands did not serve a single Gambling ad to a Child Avatar across the monitoring period. However, one of these five brands served ads to the Shared Avatar in Children's media, representing a clear breach of the CAP Code.

It is once again worth noting the relatively small sample in these circumstances (the brands which successfully limited their whole ad campaigns to non-Child Avatars served between one and four ads each during the monitoring period). Across all sites, 179 Gambling ads were served by 24 brands on 248 occasions. Many of the 179 unique ads were served just once during the monitoring period. A significant proportion of the unique ads served during the monitoring period (75 out of 179) were not served to a single Child Avatar. As a result of the context in which the data was captured, it would not be reasonable to make detailed extrapolations on the online advertising of gambling based on these results. However, the above findings appear to indicate that brands had varying degrees of success in avoiding targeting under-18s on a campaign-by-campaign basis.

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[18] *Age-restricted ads online*; Advertising guidance; 19 Jan 2021
https://www.asa.org.uk/resource/children-age-restricted-ads-online.html

Distribution of Gambling Ads by Category and Avatar

Key Findings

Gambling Category

- Online Casino gaming ads accounted for by far the most impressions, representing 77.8% of all Gambling ads impressions identified in the monitoring period.

- Ads for Sport and Events gambling accounted for just 6.9% of all Gambling ads captured during the monitoring period, likely a reflection of the suspension of professional sport during the first 2020 Covid-19 Lockdown in the UK.

Audience Selection

- Casino gaming ad impressions were distributed fairly evenly across the Avatars with age data. There was no discernible skew to adult audiences and away from child audiences, at variance with CAP Guidance on Age-restricted Ads online.

The monitoring exercise also provided an insight into the types of products featured in the Gambling ads served during the study, as shown in the table below.

<table>
<tr><td colspan="2" rowspan="2"></td><td colspan="6">Profile</td><td rowspan="2">Total</td></tr>
<tr><td>Child A
(aged 6-7)</td><td>Child B
(aged 8-12)</td><td>Teenager
(aged 13-16)</td><td>Shared
(child &
adult)</td><td>Adult
(aged 18+)</td><td>Neutral
(no specific
age profile)</td></tr>
<tr><td rowspan="5">Gambling Product Type</td><td>Casino</td><td>41</td><td>32</td><td>35</td><td>31</td><td>34</td><td>20</td><td>193</td></tr>
<tr><td>Sport/Event Betting</td><td>1</td><td>0</td><td>5</td><td>2</td><td>4</td><td>5</td><td>17</td></tr>
<tr><td>Gaming Range</td><td>2</td><td>4</td><td>3</td><td>3</td><td>3</td><td>1</td><td>16</td></tr>
<tr><td>Lottery</td><td>1</td><td>3</td><td>2</td><td>4</td><td>3</td><td>0</td><td>13</td></tr>
<tr><td>Bingo</td><td>2</td><td>0</td><td>1</td><td>2</td><td>2</td><td>2</td><td>9</td></tr>
<tr><td></td><td>Total</td><td>47</td><td>39</td><td>46</td><td>42</td><td>46</td><td>28</td><td>248</td></tr>
</table>

Gambling Category

As the table shows, remote gaming in the form of online casinos was the most common product category (193 impressions) representing 77.8% of all gambling ad impressions. Many ads in the "Gaming Range" and "Bingo" sectors were likely to also relate to or include remote online gaming.

Sports/Event Betting (17 ad impressions) represent a small proportion (6.9%) of the 248 overall gambling ad impressions. This is likely a result of the monitoring taking place during the strictest periods of the first 2020 Lockdown, when most elite sport was suspended, thus removing much of the market for sports betting.

Media Selection

Ads for Lottery products are subject to restrictions under rule 17.14 of the CAP Code, which imposes an age targeting threshold of 16+, rather than 18+. Although not evident from the table above, the monitoring exercise did not identify any instances of Lottery ads appearing on Children's websites and the total number of Lottery ad impressions (13) is too small to draw meaningful conclusions regarding the proportion of ads served to each Avatar.

Audience Selection

Casino gaming ads, the only category of gambling ads resulting in a sufficient number of impressions to allow for meaningful analysis, were distributed fairly evenly across our age-defined Avatars. There was no discernible skew to adult audiences and away from child audiences. The Neutral Avatar did, however, record comparatively fewer impressions, which suggest advertisers may have had some success in targeting their casino gaming ads away from users who cannot be accurately identified by age.

Enforcement Outcomes

HFSS Action arising from Avatar Monitoring

HFSS Ads served in Children's Media (25%+ child audience)

The monitoring identified three ad impressions for two HFSS products served on YouTube Channels where children represent a large proportion of the audience (more than 25% of the total) representing a breach of CAP Code Rule 15.18, which states:

> *HFSS product advertisements must not be directed at people under 16 through the selection of media or the context in which they appear. No medium should be used to advertise HFSS products, if more than 25% of its audience is under 16 years of age.*

To address this issue, the Project Team contacted the two brands which served these HFSS ads, requesting they take immediate steps to ensure the ads identified would no longer appear on the highlighted channels and provide information on the mechanisms they had in place to ensure their ads were not served inappropriately.

The two brands contacted were:

Kellogg's

Kellogg's served one unique ad for Pringles, on two occasions on the YouTube channel VSauce, which, although not commissioned or directly targeted at children, featured educational videos and had an under-18 audience of over 35% based on Comscore data.

Kellogg's explained that they worked with their agency to draw up a comprehensive list of approved sites; apply age targeting to their placements; exclude users in the "age unknown" category; and exclude family or child-oriented content.

Following our correspondence, Kellogg's removed VSauce from their list of approved sites and continue to work with their agency to strengthen restrictions on their HFSS advertising.

Red Bull

An ad for Red Bull was served on one occasion on the YouTube channel My Story Animated, which features animated stories submitted by teenagers and adults and had an under-18 audience of over 50% based on Comscore data.

Red Bull explained their media agency takes steps to ensure all their ads are targeted at 18+ demographics and they applied additional filters to ensure children were not targeted, including removing child-related topics and excluding users in the "age unknown" category from their placements.

When approached by the ASA, Red Bull took immediate steps to ensure ads no longer appear on the My Story Animated channel. They also stated they had already begun work with a third party to create a list of suitable YouTube channels for ages 18+.

HFSS Ads in Mixed-Age media (75-90% adult audience; 10-25% child audience)

Nine brands – including the two listed in the above section on ads in Children's Media – were found to have served 13 unique HFSS ads on 51 occasions to a Child Avatar on a Mixed-Age site. Of these 51 ads impressions, all but one was served on a Mixed-Age YouTube channel.

Whilst these incidences do not represent clear breaches of the CAP Code, given the ASA's concern to minimise children's exposure to such ads, we chose to contact the advertisers in order to better understand the approaches and challenges when targeting age-restricted ads across non-logged-in web platforms.

Responses from Brands

The monitoring data identified ads for nine HFSS brands served to Child Avatars in Mixed-Age Media sites on 51 occasions. One of the nine brands served a single ad to a Child Avatar on a website in the Mixed-Age Media category, all other ads appeared on YouTube.

The one brand which served an HFSS ad on a website informed the Project Team they had used a proprietary campaign management tool to target their campaign to over-18s and that this tool did not permit active targeting of under-18s, which may indicate the single instance identified was anomalous.

Ads from the eight remaining HFSS brands, responsible for 50 of the 51 impressions to Child Avatars in Mixed-Age Media, were all served on YouTube. Pre-roll ads on YouTube are served through the Google Display Network and subject to the targeting mechanisms available on that platform.

The brands contacted sought clarity on our rationale for investigating the placement of HFSS ads on websites and YouTube channels attracting an audience of which less than 25% are under 16 years of age. In many cases, they highlighted audience data showing these channels at the lower end of the 10-25% under-18s Mixed-Age categorisation or that the channels were unlikely to appeal to younger age groups represented by our Avatars.

The eight HFSS brands stated they actively targeted their campaigns away from under-18s, particularly as younger viewers were less likely to purchase many of the products advertised, which included raw and canned meat products, and sweetened coffee. In all cases the brands provided information which confirmed age targeting alongside additional layers of interest-based restrictions to further limit under-18s being served the ads.

Common approaches by the brands to avoid serving HFSS ads to under-16s included:

- Restricting ads to over-18s (two HFSS brands used 25+ and 35+ categories).
- Preventing ads being served to users in the Age Unknown category.
- Applying content filters to prevent ads appearing adjacent to content likely to be of interest to children.
- Implementing safelists of content alongside which their HFSS ads can appear.
- Excluding uncategorised content.

One advertiser expressed concerns that age appeared to be the sole demographic targeting tool available on the platform. Several brands indicated they had enlisted third-party monitoring companies and brand safety tools to review their campaigns and ensure their HFSS ads were not served inappropriately. Some brands indicated that data provided to them by third parties suggested no under-18 impressions of the ad were identified, even though the ads had been delivered to our Child Avatars.

The HFSS brands considered these rigorous measures should have been sufficient to prevent ads for their products being served to the Child Avatars with profiles clearly indicative of under-16s. Some brands indicated their campaigns had excluded Age Unknown users but were still found to have served HFSS ads to the Neutral Avatar which had no indicative information in its profile in order to be identified as over- or under-16.

Creative content

The Avatar monitoring did not identify any ads for HFSS products which clearly breached the CAP Code rules on appealing to children through their creative content, or use of licensed characters or celebrities popular with under-16s. The work involved in assessing the creative content of the relevant HFSS ads is outlined in Appendix 2.

Gambling Ads served in Children's Media (25%+ child audience)

The monitoring exercise identified 64 instances where nine Gambling brands served ads on websites in the Children's Media category. These instances represented clear breaches of CAP Code Rule 16.3.13 and merited action to prevent continued serving of gambling ads on such websites.

The CAP Compliance Team took proactive action to contact the two brands which served Gambling ads on the websites with the most substantial child audiences (40% or more based on Comscore data) representing the clearest breaches of the CAP Code.

The brands were required to take immediate steps to ensure the ads identified would no longer appear on the sites in question, and were asked to provide information on the mechanisms they had in place to ensure their ads were not served inappropriately.

The two brands contacted regarding ads appearing on websites with the most substantial child audiences were:

PlayOJO

The monitoring exercise identified two ads for PlayOJO appearing on the website quizdiva.net which, although not commissioned for or directly targeted at children, had an under-18 audience of over 50% based on Comscore data.

PlayOJO explained they maintain a comprehensive list of approved websites to prevent their ads appearing in media intended for/popular with children. Quizdiva.net was not part of their list but had been included as part of their "prospecting" approach – running trial ads on websites before deciding whether or not to include the sites on an approved list.

PlayOJO indicated their existing brand safety approach had not highlighted quizdiva.net as a site popular with under-18s and so it had not been considered a potential risk. Following correspondence from the CAP Compliance Team, PlayOJO revised their approach to strengthen the restrictions on sites included in prospecting.

Slots Baby

The monitoring exercise identified one ad for Slots Baby, also appearing on quizdiva.net, a site on which, based on Comscore data, over 50% of the audience was under-18.

Following correspondence with the CAP Compliance Team, Slots Baby took immediate steps to address the issue. Slots Baby identified a specific third-party media buyer as the source of the inappropriate choice of media. Slots Baby then contacted all their ad partners and affiliates to reiterate the requirements of the CAP Code and ensure the error would not be replicated in the future.

Gambling Ads in Mixed Age Media (75-90% adult audience; 10-25% child audience)

The monitoring data identified 11 Gambling brands which served ads to Child Avatars on 69 occasions in Mixed-Age Media sites. The 11 Gambling brands were represented by a total of seven Gambling operators, as some brands were linked to larger parent organisations.

The data from Ad Intelligence showed all the Gambling ads were served dynamically, and many of the ads were only served to certain Avatars visiting the Mixed-Age sites, which seems to indicate the ads were targeted based on the user profile data of the Avatars.

The Project Team contacted the seven Gambling operators to establish what mechanisms they had in place to target their ads to a demonstrably adult audience and away from any under-18 audience segments, thereby minimising children's exposure to ads for gambling products.

The operators which served ads to Child Avatars were mostly smaller in size, which may indicate larger operators, perhaps as a result of greater legal and regulatory compliance resources, are more effective in minimising under-18s' exposure to gambling ads.

Responses from Brands

Many Gambling operators' initial responses highlighted their evident concern to address, as a matter of priority, the specific problem ad impressions identified e.g. undertaking to place the sites in question on blocklists and outlining how they currently strive to ensure they do not serve ads in Children's Media.

It is the ASA's view that well researched and comprehensive blocklisting of sites is an effective tool in removing websites and YouTube channels from advertisers' media-buying lists. However, it is arguably a disproportionate measure in the case of Mixed-Age Media sites (where adults comprise 75%-90% of the audience) where gambling brands and other age-restricted advertisers can legitimately target the adult audience of such sites, while also take steps to appropriately limit under-18s' exposure to their dynamically-served ads.

As a result, the Project Team engaged further with the Gambling operators and their ad partners to establish why these specific ads were served to Child Avatars in Mixed-Age Media. The operators and their ad partners outlined a variety of approaches and offered a range of possible explanations for the ads identified.

The more detailed information did not present any clear patterns relating to the role of platforms on which the ads were served, or the tools and targeting mechanisms used. The most common factor was that operators had used platforms' default 18+ targeting functionality, yet their ads were delivered to our Child Avatars, with browsing histories clearly representative of under-18s, and the Neutral Avatar, which, with no previous browsing history, could not be reliably categorised as 18+.

This information might suggest that data and modelling underlying audience targeting tools made available by platforms and other third parties were not as effective as they could be in minimising the exposure of children and 'age unknown' users to age-restricted ads.

Some Gambling operators expressed the view that ad networks are unlikely to have access to reliable data on the browsing history for the majority of non-logged-in internet users, and thus an 18+ targeting functionality cannot reliably form the primary basis of effective age targeting. As a result, one operator considered, Gambling brands and their ad partners rely on a range of contextual segments (i.e. providing insight on the likely age demographic attracted to particular online content) which cannot offer complete and thorough exclusions of under-18s; therefore brands must focus on directing their ads towards media and interest segments likely to be representative of 18+ users.

Several operators indicated they exclusively used first-party audience data from their own website users for retargeting and/or look-a-like targeting. However, as none of our Avatars visited Gambling websites when building their profiles, the retargeting ads should not have been served to any Avatars, child, adult, or otherwise. Unless the look-a-like profiles were poorly designed or unduly broad – for example interest in sport, music, and gaming (including non-gambling computer gaming) – then none of the Child Avatars should have had interests or behaviours which aligned with the look-a-like profile of users who have visited and interacted with a gambling website.

The ongoing conversations with Gambling brands and their ad partners elicited a range of perspectives and possible explanations for the continued problem serving of age-restricted ads to Child Avatars despite the use of multiple mechanisms to minimise such occurrences.

The potential explanations included:

- One operator believed accurately identifying users as under 18 would be potentially problematic under GDPR and posited this may explain issues with age-based targeting. However, other ad industry and regulatory bodies contacted during the project indicated this supposition was inaccurate.
- Some operators considered focusing on accurately targeting over-18s only, in order to exclude all other users who cannot confidently be categorised as over-18, would not be possible as a result of limitations in third-party age data. One operator provided proprietary data from a Demand Side Platform which purported to show that less than 1% of non-logged-in online users could be definitively identified as over-18.

The engagement with Gambling operators and their ad tech partners showed that a range of complex issues are at play in contributing to the monitoring project identifying multiple problematic instances of ads being served to Child Avatars. This is despite the fact the monitoring was conducted at a time when general advertising activity was significantly reduced as a result of the first Covid-19 lockdown in the UK.

Creative content

The Avatar monitoring did not identify any Gambling ads which clearly breached the CAP Code rules on appealing particularly to children through their creative content, or through use of licensed characters or celebrities popular with under-18s. The work involved in assessing the creative content of the relevant Gambling ads is outlined in Appendix 3.

Conclusions and next steps

The ASA must be proportionate in its regulation, balancing evidence of harm arising from advertising with marketers' freedom of expression. In this context, it and predecessor regulators of broadcast advertising have long accepted as proportionate permitting marketers of age-restricted products to serve ads in media attracting an overwhelmingly adult audience, subject to compliance with rules on the creative content of ads, which ensure children (and adults vulnerable to the underlying product) are not inappropriately appealed to or otherwise exploited by ads for alcohol, gambling etc.

Technology now enables online marketers of age-restricted ads to go further: to direct their ads away from the minority child audiences in media where at least 75% of the audience are adults. This audience-addressable technology is well established in and inherent to online advertising, and equivalent technology is fast emerging in other forms of media, including TV and outdoor media.

In pursuit of a legitimate regulatory objective to minimise children's exposure to age-restricted ads, the ASA considers it is proportionate to encourage advertisers to make use of this technology, where available, to further target their dynamically-served ads away from child and age-unknown audience.

The findings of this Report suggest marketers of age-restricted products and third parties which play a part in distributing these ads online, could do more to demonstrably skew these ads away from child and age-unknown audiences, in line with CAP Guidance on Age-restricted Ads Online.

The ASA already uses its investigatory and enforcement powers to adjudicate against advertisers who have, in clear breach of the CAP Code, targeted ads in online media where 25% or more of the audience are children. It is theoretically able to do the same in circumstances where it feels advertisers and the third parties they engage have not done enough to direct dynamically-served age-restricted ads away from child audiences in online media where 75% or more of the audience is adult.

In line with better regulation practices, however, the ASA will ask CAP to review this report alongside existing CAP Guidance to consider whether a more prescriptive approach is merited for regulating dynamically-served age-restricted ads.

The ASA and CAP are aware that technologies currently integral to the dynamic-targeting of display ads (primarily, Third-Party Cookies) will soon become less commonplace within online infrastructure.[19] However the core principle of using available media- and audience-selection tools to direct age-restricted ads towards appropriate audiences and away from children online, will remain applicable to any new approaches which emerge to replace existing technologies. The ASA and CAP encourage advertisers to engage with their ad partners and technology providers to ensure these emerging technologies can support sufficient rigour in the application of online targeting tools in order to minimise children's exposure to ads for age-restricted products.

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[19] VCCP London; *THE END OF THE TRACK FOR TRACKING;* 19/03/2021
https://www.vccp.com/collaborative/2021/mar/the-end-of-the-track-for-tracking

Appendices

Appendix 1: Monitoring Methodology

The Avatar monitoring was conducted between Monday 20 April and Sunday 10 May 2020. The six Avatars made a total of 252,000 website visits during the monitoring period and were served 27,395 ads across all sectors on these visits.

For the avoidance of doubt, whilst the Avatar online profiles mimic those of internet users of different ages, including child internet users, the monitoring exercise, which involved each Avatar visiting 250 web pages on both desktop and mobile devices, twice a day, is obviously not reflective of children's actual day-to-day browsing behaviour. This is important information, which allows the reader to understand the figures presented in this report in context and explains why it is not reasonable to extrapolate daily, weekly, monthly etc. advertising exposure levels from the data.

When the monitoring commenced on Monday 20 April, the number of ads captured by the Avatars was initially significantly lower than expected. It was not possible to establish whether this was simply reflective of a slowdown in the online ad market during the first Covid-19 lockdown in the UK, or the result of a technical issue. Therefore the monitoring period was prolonged to capture an additional week's worth of data, extending to Sunday 10 May. As the project was not intended to provide a representative sample of ad exposure to the different Avatars, monitoring data which had been successfully captured from the first week, 20-26 April, was included in the final dataset.

Comparison of 2018 and 2020 Monitoring Projects

The 2020 Avatar monitoring project was not intended to replicate the 2018 project and took place in the early stages of the Covid-19 pandemic; exceptional circumstances generally and for the UK and international ad market. The objective of the 2020 monitoring project was to identify patterns of problematic targeting of programmatic ads for restricted products in "Mixed-Age Media". The ideal output would show a marked contrast in the proportion and number of age restricted ads being delivered to our Avatars, with a demonstrable skew towards the Adult Avatars. The 2018 monitoring project primarily focused on instances of age-restricted ads appearing in Children's Media (a prima facie breach of the UK Advertising Code) regardless of the profile of the recipient.

Despite the extended monitoring period in 2020, the Avatars were served substantially fewer ads than in 2018, likely in large part due to a slow-down in the UK ad market during the early stages of the first Covid-19 lockdown in the UK.

A total of 27,395 ads were captured by 6 Avatars with 252,000 page visits in 2020, compared with 95,665 ads captured by 7 Avatars with 196,000 page visits in 2018. 823 'restricted category' ads (e.g. for HFSS, Gambling etc.) were served in 2020, compared with a total of 7,799 ads in 2018.[20]

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[20] The categories included in the 2020 Monitoring were more precise than those used in 2018. The total of 7,799 ads for 2018 is reached by removing the ads in the Food Retail category which included supermarket homewares and clothing ranges, from the 2018 total number of categorised ads 9,612.

Differences in context and methodology of the 2018 and 2020 projects mean it is not reasonable to draw conclusions from the significant reduction in the volume and proportion of ads for restricted products in 2020. Furthermore, the small sample size means detailed comparisons of Avatars using the 2020 data are unlikely to be statistically relevant.

Development of Media Universe

The 2020 monitoring exercise focused on ads served in Mixed-Age Media, so websites and YouTube channels in this category formed the majority of the Media Universe.

For the purposes of this project, Mixed-Age Media is represented by websites and YouTube channels which attract a significant audience of under-18s but are not specifically commissioned for or targeted at under-18s (content in *that* category would be considered "Children's Media"). However, websites and YouTube channels outside of the Mixed-Age Media category (i.e. child orientated or adult orientated media) were included in order to provide comparative data on display ads for restricted products across the internet.

The 250 websites and YouTube channels in the monitored Media Universe were separated into the following categories:

- **Mixed-Age Media**
  98 Websites and 78 YouTube channels with content which may interest under-18s, but which is not commissioned for or directly targeted at under-18s. The benchmark for Mixed-Age Media was set at 10-25% under-18 audience share (based on Comscore data). Examples include music and pop culture websites and YouTube channels.

- **Children's Media**
  13 Websites and 13 YouTube channels with content commissioned for or targeted at under-18s, and/or which have an under-18 audience share of over 25%. Examples include homework sites, teen lifestyle content and certain video game content.

- **Adult Media**
  32 Websites and 16 YouTube channels with content which is likely to be of limited interest to under-18s and where under-18s make up a small proportion of the audience (less than 10%). Examples include newspaper, finance and motoring sites.

As the content of Mixed-Age Media is not specifically commissioned for or targeted at under-18s and adults comprise 75%-90% of the audience, there is no prohibition on advertisers running untargeted 'all audience' ads for restricted products on such sites.

However, because technology allows advertisers to dynamically display personalised ads based on audience groups' online behavioural data, CAP's Guidance on Age-restricted Ads Online[21] requires advertisers to take steps to minimise the risk of audience members known or inferred to be under-18 being served age-restricted ads in Mixed-Age environments.

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[21] *Age-restricted ads online*; Advertising guidance; 19 Jan 2021
 https://www.asa.org.uk/resource/children-age-restricted-ads-online.html

For example, an alcohol brand wishing to target their ads at adults and exclude, as far as possible, under-18s from the audience may take a number of steps not restricted to those set out in CAP's Guidance. Companies with access to proprietary first-party customer data, such as Gambling operators, may also be able to integrate this data into their targeting approaches to actively target users they can reliably determine to be over 18.

The Media Universe was chosen from a list of the 2,000 most popular web domains and top 100 YouTube properties for UK internet users in October 2019 as provided by Comscore.[22] The Comscore data indicated the number of unique visitors in specific age categories (6-12; 13-14; 15-17)[23] as well as data on the total number of unique visitors, which made it possible to extrapolate the proportion of the audience on each site which was under 18. Any sites with insufficient data for each age category to reasonably establish the overall under-18 audience were excluded from the sample.

Note: The ASA chose to use Comscore because, to the end of 2020, it was the provider of UKOM-endorsed industry standard online audience measurement data in the UK. This should not be taken as an indication the ASA considers Comscore the only appropriate mechanism for online audience measurement or monitoring. A range of online audience demographic tools are available to advertisers. Provided these tools are suitably rigorous, they are likely to be considered appropriate by the ASA for regulatory purposes e.g. in assisting an advertiser to provide evidence of how they have met CAP's advertising targeting restrictions.

The ASA chose to take enforcement action only against the clearest instances where ads for restricted products were served on sites in the Children's Media category (sites either clearly targeted at children or where under-18 represented significantly more than 25% of the audience).

To identify websites and YouTube channels for the Media Universe, the Project Team reviewed the 1,100 most popular websites across age groups to ensure they served UK-focused display ads to first-time casual (non-logged-in) users on the front page or a linked page, mimicking the automated behaviour patterns of the Avatars.

Sites which did not serve display ads under these criteria were removed from consideration. Sites containing extreme, pornographic, or offensive content were also excluded from the sample. Advertisers may use brand safety tools to prevent their ads appearing alongside such inappropriate content, but that broader issue was outside the remit of the project.

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[22] Comscore MMX data, approved by UKOM, provides online desktop and laptop audience measurement data for individuals aged six or over. It uses a hybrid approach to its methodology, combining a metered panel with data from websites, applications and video tags. Panellists provide demographic information on themselves and their household and software tracks visits on their device(s) to websites and apps.
Comscore also collects audience measurement data on smartphone and tablet usage (Comscore Media Matrix Multi-Platform data) but this provides full data only for those aged 18 and over, partial data for those aged 13 and over, and no data on those aged under 13. Because our focus is on those aged up to 18 years old, we considered this data was not sufficiently relevant for the purposes of our monitoring exercise.
[23] Many of the 100 YouTube properties in the Comscore data contained multiple channels within each "property" For example, the VEVO property contained over 400 Vevo-related YouTube channels with audience data for 13-14 year olds alone. As a result the Project Team chose the 100 channels for the Media Universe from a total sample of over 6,000 unique YouTube channels.
This was also the case for many of the websites in the 2,000 most popular domains list across general audiences and all child audience. As a result the Comscore data contained a total of over 3,500 unique URLs.

Following these exclusions, the 150 websites and 100 YouTube channels in the Media Universe were selected to mirror the respective spread of categories in the larger Comscore lists for all eligible sites.

Categories of Age-restricted Ads

Advertising Intelligence collected information regarding banner ads; in-line ads (an ad typically within the main body column of a page); video ads on webpages; and pre-roll and mid-roll ads on YouTube videos.

Every ad captured was categorised using Advertising Intelligence's database to establish the brand and nature of the product being advertised. Each ad which fell into the indexed categories (Alcohol, Gambling, Food and Soft Drink) was individually logged and saved. Based on findings from the 2018 Avatar monitoring, the range of subcategories was expanded to capture the broadest sample of ads for restricted products. In addition, subcategories which had produced a high number of irrelevant results in 2018 (for example, Supermarket clothing ranges) were excluded.

Ads in the following headline categories and subcategories were indexed in detail and the data retained during the monitoring:

- Alcoholic drinks (including Mail Order, Off Licence Stores, Supermarkets)
- Gambling (including Bingo Halls)
- Food (including Soft Drinks, Fast Food, Restaurants, Supermarkets, Mail Order)

The following details were saved for each indexed ad:

- Date and Time Served
- URL of the Page/Video visited (and a screenshot of the ad in context)
- URL of the landing page hyperlinked within the ad body
- Whether the ad was seen on a Mobile or Desktop device
- The positioning of the ad (e.g. banner; mid-page; wrap-around; pre-roll video)
- Information on how the ad was delivered (ad delivery chain string, estimated buy type)

The inclusion of information on the method of ad delivery was a vital element which allowed the 2020 monitoring project to focus on dynamically-targeted ads. Under the CAP Code, 'all audience' untargeted ads for restricted products are allowed to appear in media which is not commissioned for or targeted at children and where children make up less than 25% of the audience. Therefore untargeted ads for restricted products are unlikely to be a problem in Mixed-Age Media, where 75%-90% of the audience is composed of adults.

Importantly, the 2020 monitoring found indicative data of Avatars representing the online profiles of under-18s being served dynamically-targeted ads for Gambling and HFSS products. This outcome could be representative of a failure (on the part of the advertiser, agency, ad tech provider, user data holder or aggregator etc.) to avoid serving these ads to audience groups, known or inferred to be, under 18 years of age.

Each ad indexed was investigated to establish whether it featured restricted products, for example an HFSS soft drink, as opposed to a non-HFSS equivalent. To limit the number of unsuitable ads captured the Avatar monitoring focused only on those sectors where restricted products were most likely to appear in ads.

Previous ASA's research, such as, *Children's Exposure to Age-Restricted TV Ads* (2018), included ads for Theme Parks, Cinemas, Gyms and Leisure Activities in their assessment of HFSS exposure.[24] The ASA's ongoing 'CCTV online monitoring project' includes ads for Theme Parks, Cinemas, Nightclubs & Discotheques and Casinos, in its sample categories to identify ads for restricted products.[25] The creative content of ads in these categories may contain restricted products but as the majority of these brick-and-mortar businesses were not operating in the period when the monitoring took place (during the first Covid-19 lockdown in the UK) they were not included in the project.

Classification of Products Featured in Ads

The monitoring identified 209 unique ads in Ad Intelligence's Gambling category. 30 of these ads were found to relate to online casino-type games where it was not possible for players to stake money, and so they were excluded from further analysis. The remaining 179 unique ads were for Gambling products from operators registered with the UK Gambling Commission and authorised to receive paid wagers.

The monitoring did not identify any ad impressions at all in the Alcohol categories, nor any Food & Soft Drinks ads prominently featuring alcoholic products, so it was not necessary to consider any ads under the Alcohol rules in Section 18 of the CAP Code.

However, a more involved approach was necessary to establish which Food & Soft Drinks ads identified during the monitoring featured HFSS products and thus were subject to the restrictions under Section 15 of the CAP Code.

102 unique Food & Soft Drinks ads were served a total of 575 times during the monitoring exercise.[26] Each of the 102 ads was assessed to establish whether they featured products or brands which were subject to the HFSS restrictions.

The Department of Health and Social Care Nutrient Profiling Model (NPM) established in January 2011, was used to determine whether foods and drinks featured in the ads fell into the HFSS category. Where detailed nutritional information was not available for the products featured in the ads a similar product was identified in McCance and Widdowson's *Composition of Foods Integrated Dataset (CoFID)* to produce an indicative nutritional composition for categorisation.[27]

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[24] The TV advertising research used some data which had been pre-validated to establish whether specific ads contained HFSS products. There is no equivalent commercial database of online ads which would allow for similar cross-referencing of the data from the Avatar monitoring.
[25] *Protecting children online: our online monitoring results for Q4 2020* ASA News 11 Feb 2021 www.asa.org.uk/news/protecting-children-online-our-online-monitoring-results-for-q4-2020.html
[26] 2 unique ads responsible for 5 of the Food ad impressions were determined not to have been served dynamically. Both of these ads were for Ineligible food products, so they are not included in later calculations involving HFSS ads only. Every ad for an HFSS product was determined to have been served dynamically.
[27] Documentation relating to The Department of Health and Social Care's Nutrient Profiling Model can be found here: www.gov.uk/government/publications/the-nutrient-profiling-model

The NPM applies to all foods, and non-nutritive condiments and foods, such as spices and coffee products. Each unique ad was viewed and the content assessed to identify any product or brand which could be considered to fall into the HFSS category.

This process led to the exclusion of 73 unique ads, which showed only non-HFSS or Ineligible products and were served on 393 occasions. 28 of these ads were excluded on the basis they featured non-HFSS products or were not inherently associated with HFSS products. Examples of ads that were excluded by this process include:

- ads for a brand of spice and seasoning;
- ads from supermarkets featuring recipe ideas, or seasonal fruit and vegetables;
- ads for apps that could link food purchases to online recipes;
- ads for food ingredient boxes

Ads containing information on how supermarkets were responding to the pandemic – unsurprising during a period when a full national lockdown was in place and food shopping was one of few reasonable excuses to leave home – but which did not feature specific products, HFSS or otherwise, were also excluded from consideration at this stage.

Further ads were excluded as non-HFSS once their nutritional composition was confirmed through the Nutrient Profiling Model. Examples of ads which scored below the threshold to be considered an HFSS product on the NPM included:

- ads for a ready-to-eat vegetarian snack;
- ads for a yoghurt; and
- ads for a dehydrated convenience meal

In the case of two ads, the nutritional content of the products shown, a beef burger and a pork sausage, could not be clearly identified. The advertiser, a supermarket, was contacted to ascertain, and confirm that these were in fact HFSS product ads.

Once all non-HFSS ads and Ineligible products were excluded this left 29 unique ads which were served 182 times (0.7% of all ads served) and were:

- Clearly for or prominently featuring HFSS products;
- Linked to brands likely to be synonymous or very strongly associated with HFSS; or
- For products likely to be HFSS but where a clear nutrient profile could not be identified
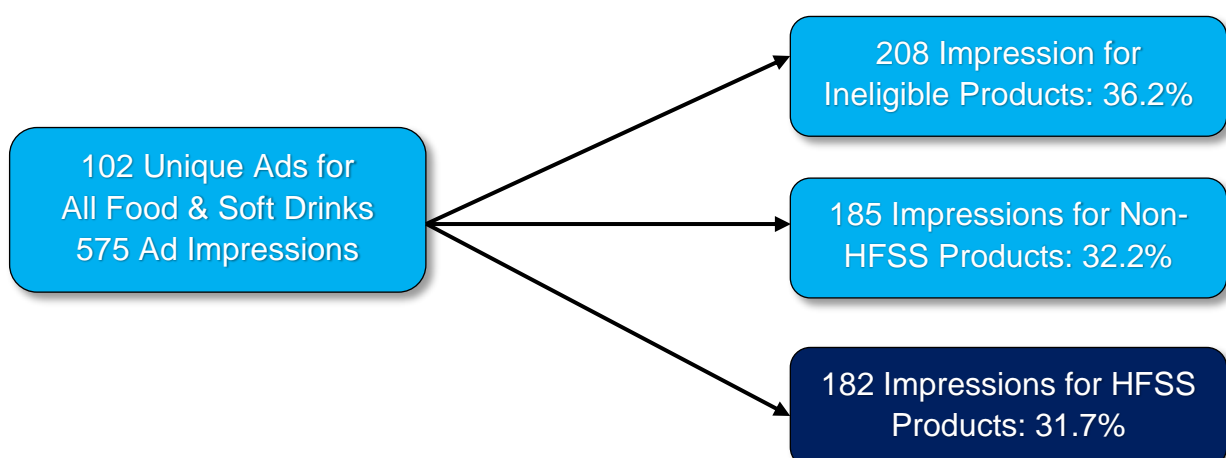
As the above chart shows, the 102 unique Food & Soft Drinks ads captured in the monitoring period were served to the Avatars 575 times in total. Of the 575 impressions, the distribution of ads across all three categories was fairly even, with 36.2% of ads categorised as Ineligible Products; 32.2% as non-HFSS; and 31.7% as Clear HFSS ads.

The 208 ad impressions for Ineligible products included:

- 55 impressions for food delivery services
- 57 impressions for a web app which adds recipe ingredients to supermarket deliveries
- 56 impressions for supermarkets which detailed their responses to Covid-19

Supermarket ads were less common in other categories. The monitoring identified 21 non-HFSS supermarket ad impressions compared with four in the HFSS category.

Amongst the 185 ad impressions in the non-HFSS category were:

- 87 ad impressions for spices
- 29 ad impressions for sugar-free gum

The table below shows the distribution of all food and soft drink ads served to each Avatar.

		Food Ad Category			
		Ineligible Product	Non-HFSS	Clear HFSS	Total
Profile	Child A (aged 6-7)	41	32	27	100
	Child B (aged 8-12)	39	31	20	90
	Teenager (aged 13-16)	35	20	30	85
	Shared (child & adult)	28	38	25	91
	Adult (aged 18+)	35	41	28	104
	Neutral (no specific age profile)	30	23	52	105
	Total	208	185	182	575

Given the small sample size (182 impressions of 29 unique ads) the number of ads served is often too small to allow for meaningful comparisons between Avatars. Across all Food & Soft Drink categories, ads were served in reasonably even proportions to each Avatar. However, the largest variation appears in the Clear HFSS category. The Neutral Avatar was served ads for HFSS products on 52 occasions (28% of all HFSS ad impressions) whilst Child B was served the fewest with just 20 HFSS ad impressions.

Appendix 2: HFSS Ads Creative Content

102 unique Food and Soft Drinks ads were served a total of 575 times during the monitoring exercise.[28] Each of the 102 ads was assessed to establish whether they featured products or brands which were subject to the HFSS restrictions.

Once all non-HFSS ads and Ineligible products were excluded this left 29 unique ads which were served 182 times (0.7% of all ads served) and were:

- Clearly for or prominently featuring HFSS products;
- Linked to brands likely to be synonymous or very strongly associated with HFSS; or
- For products likely to be HFSS but where a clear nutrient profile could not be identified.

29 Unique HFSS Ads

182 HFSS Ad Impressions

YouTube:
14 Unique Ads
136 Ad Impressions
(74.7%)

Websites:
15 Unique Ads
46 Ad Impressions
(25.3%)

Snack Foods:
14 Unique Ads
119 Ad Impressions (65.4%)

Confectionery & Ice Cream:
3 Unique Ads
44 Ad Impressions (24.2%)

Other Foods:
12 Unique Ads
19 Ad Impressions (10.4%)

0 HFSS Ads with Content Appealing to Children

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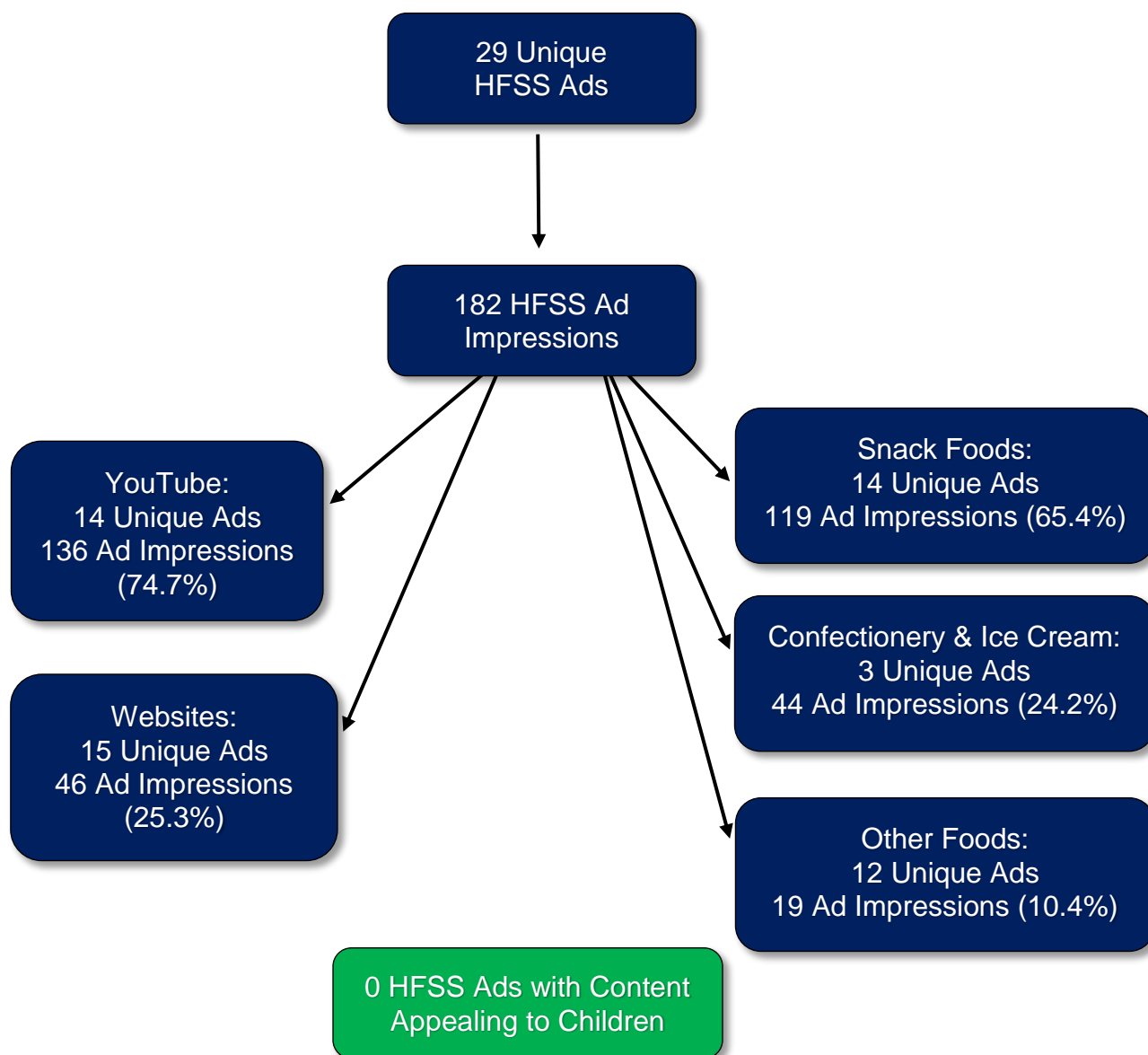
[28] 5 of the Food ad impressions and 2 unique ads were determined not to have been served dynamically. Both of these ads were for Ineligible food products, so they are not included in further calculations involving HFSS ads only. Every ad for an HFSS product was determined to have been served dynamically.

The 29 unique HFSS ads from 11 advertisers were served a total of 182 times during the monitoring exercise. The ads were assessed by ASA and CAP HFSS ad specialists to establish whether they featured creative content likely to breach the dedicated rules in Section 15 of the CAP Code.

The 29 ads were found, in compliance with the CAP Code, not to contain any creative content directly targeted at children: they did not include characters likely to specifically appeal to children, nor any licensed characters.

Of the 182 HFSS ad impression, 119 instances were for two brands of savoury snack (products of potential interest to children) but the creative content of the ads was unlikely to appeal to children. Ads from one of these brands highlighted the product's likely appeal to children, but the content was directed at parents and the ads only appeared on the parenting website Mumsnet, which was in the Adult Media category and so unlikely to be visited by children.

Two brands in the Confectionary & Ice Cream category (for products of potential interest to children) were responsible for 44 ad impressions. All ads from these brands appeared on YouTube but neither brand served ads in Children's Media (where more than 25% of the audience are children) and the content of the ads was, in compliance with the Code, not considered likely to appeal to children.

Of the 182 HFSS ads served, just 46 impressions (25.3%) were served on websites, and 42 of these impressions were for the above-referenced savoury snack campaign on Mumsnet. The 136 HFSS ad impressions served on YouTube represented 74.7% of all HFSS ad impressions recorded in the project.

Appendix 3: Gambling Ads Creative Content

179 unique Gambling ads from 24 brands were served a total of 248 times during the monitoring exercise. 52 ads were found to have been served to Child Avatars in Mixed-Age Media and were assessed by ASA and CAP Gambling Specialists to establish whether they featured creative content likely to breach rules in Section 16 of the CAP Code.

```
                    ┌─────────────────────┐
                    │   179 Unique        │
                    │   Gambling Ads      │
                    └──────────┬──────────┘
                               │
                               ▼
                    ┌─────────────────────┐
                    │ 52 Unique Gambling  │
                    │ Ads Assessed for    │
                    │ Content             │
                    └──────────┬──────────┘
                               │
                               ▼
                    ┌─────────────────────┐
                    │ 12 Ads with         │
                    │ Potential Problem   │
                    │ Content             │
                    └──────────┬──────────┘
```

| 6 Missing Significant T&Cs | 3 Potential Appeal to under-18s | 2 Potential Misleading Claims | 1 Missing T&Cs + Potential Appeal to under-18s |
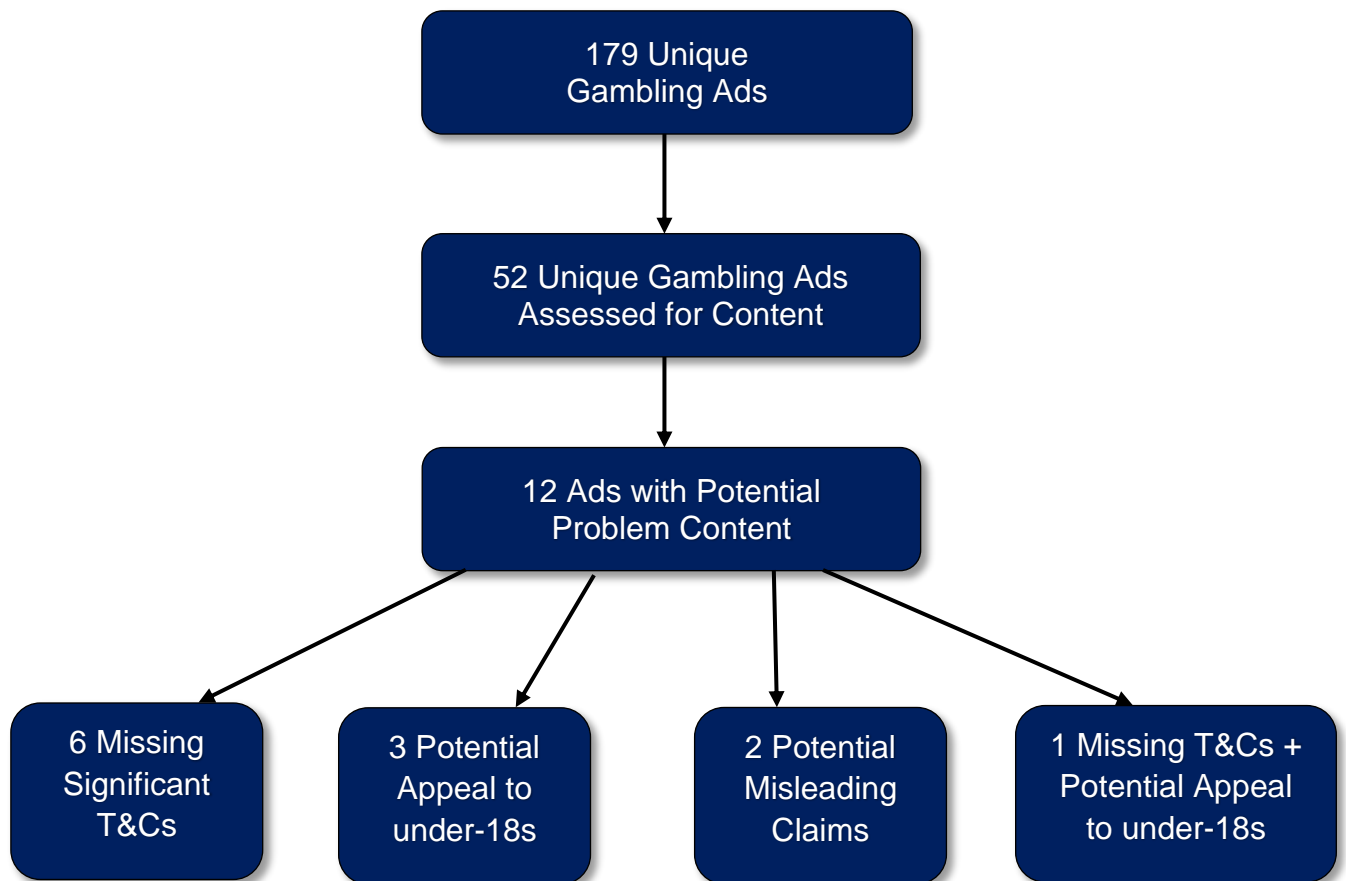
The Gambling Specialists found that 12 of the 52 ads served to Child Avatars in Mixed Age Media contained creative content which could be problematic under the CAP Code.

- This included 6 ads with potential issues around clarity of terms and conditions/wagering requirements.
- The other 6 ads presented less clear-cut issues which could not be verified through assessment of ad content alone. These included the use of a featured model who potentially appeared under 25 (reflecting a prohibition in the Code), and use of a "world's biggest" claim which would require robust substantiation under the Code.

The 7 Gambling operators who served these 12 ads were scheduled to be contacted regarding the serving of programmatic ads to Child Avatars in Mixed-Age Media as part of the monitoring follow-up. In addition, they were informed of potential creative content issues identified by ASA staff and given advice on how to amend their ads to address the issues.

All of the Gambling ad impressions were display ads appearing on websites. The monitoring data did not identify any instances of Gambling ads served on YouTube.

Appendix 4: List of Websites in Avatar Monitoring Media Universe

Category	Sites	
CHILD	AGAME.COM	Channel Frederator Network @ YouTube
CHILD	COOLMATHGAMES.COM	DreamWorksTV 9Abi-UXhePBFnag907k86w @ YouTube
CHILD	GAMES.CO.UK	FilmTheorists @ YouTube
CHILD	GIRLSGOGAMES.CO.UK	GeniunelyMoriah @ YouTube
CHILD	MINECRAFTSKINS.COM	MatthewPatrick13 @ YouTube
CHILD	MINICLIP.COM	MY STORY ANIMATED @ YouTube
CHILD	MMOSQUARE.COM	Norris Nuts Do Stuff @ YouTube
CHILD	PANZOID.COM	ThatMumboJumbo @ YouTube
CHILD	PLANETMINECRAFT.COM	theodd1sout comic @ YouTube
CHILD	QUIZDIVA.NET	Vsauce @ YouTube
CHILD	REVISIONSCIENCE.COM	
CHILD	SEVENTEEN.COM	
CHILD	SOURCEFORGE.NET	
CHILD	THEFAMOUSPEOPLE.COM	
CHILD	THESIMSRESOURCE.COM	
CHILD	WHEELDECIDE.COM	

Category		Sites
MIXED	4J.COM	AWAL Digital Limited @ YouTube
MIXED	ANSWERS.COM	Barcroft TV @ YouTube
MIXED	APKPURE.COM	Bebe Rexha @ YouTube
MIXED	AZLYRICS.COM	BecauseMusic @ YouTube
MIXED	BABYCENTRE.CO.UK	Believe @ YouTube
MIXED	BIOGRAPHY.COM	Binging with Babish @ YouTube
MIXED	BRITANNICA.COM	blndsundoll4mj @ YouTube
MIXED	BUZZFEED.COM	Britain's Got Talent Channel @ YouTube
MIXED	CAPITALFM.COM	Call Me Kevin @ YouTube
MIXED	CARTOONCRAZY.NET	CalvinHarrisVEVO @ YouTube
MIXED	CBR.COM	CamilaCabelloVEVO @ YouTube
MIXED	CLIFFSNOTES.COM	CD Baby @ YouTube
MIXED	CLIPART-LIBRARY.COM	Charlie Puth @ YouTube
MIXED	COLLIDER.COM	ChrisBrownVEVO Channel @ YouTube
MIXED	COMICBOOK.COM	Clean Bandit @ YouTube
MIXED	COMPUTERHOPE.COM	Complex Networks and affiliates @ YouTube
MIXED	CREATIVEBLOQ.COM	Complex Video @ YouTube
MIXED	DAFONT.COM	CONTENTbible @ YouTube
MIXED	DEFINITIONS.NET	Discovery International @ YouTube
MIXED	DENOFGEEK.COM	Dr. Phil @ YouTube
MIXED	DICTIONARY.COM	DRIVETRIBE @ YouTube
MIXED	DOCSHARE.TIPS	Ed Sheeran @ YouTube
MIXED	DOWNDETECTOR.CO.UK	Emergency Awesome @ YouTube
MIXED	ENGADGET.COM	EminemVEVO Channel @ YouTube
MIXED	EUROGAMER.NET	emma chamberlain @ YouTube
MIXED	FAMOUSBIRTHDAYS.COM	EMPIRE Distribution @ YouTube
MIXED	FANFICTION.NET	gameranx @ YouTube
MIXED	FLICKSMORE.COM	GQ Channel @ YouTube
MIXED	FOODNETWORK.COM	GRM Daily @ YouTube
MIXED	FREETOPLAY.COM	IGN @ YouTube
MIXED	FUTBIN.COM	ITV @ YouTube
MIXED	FUTHEAD.COM	JaackMaate @ YouTube
MIXED	FUTWIZ.COM	JennaMarbles+user @ YouTube

Category	Sites	
MIXED	GAMESPOT.COM	Jess Glynne @ YouTube
MIXED	GAMESRADAR.COM	KatyPerryVEVO @ YouTube
MIXED	GENIUS.COM	KhalidVEVO @ YouTube
MIXED	GETEMOJI.COM	Kin @ YouTube
MIXED	GETREVISING.CO.UK	Kylie Jenner @ YouTube
MIXED	HDOWNLOADMYINBOXHELPER.COM	LewisCapaldiVEVO @ YouTube
MIXED	HISTORYEXTRA.COM	Live Nation Video Network A&L @ YouTube
MIXED	IGN.COM	Made In Network CHSA @ YouTube
MIXED	INVERSE.COM	Marvel Entertainment @ YouTube
MIXED	KNOWYOURMEME.COM	MattDoesFitness I37iZ6NI66tLJNYxLBlfLw @ YouTube
MIXED	KOTAKU.COM	MollyMae @ YouTube
MIXED	LIVESCIENCE.COM	Movieclips @ YouTube
MIXED	MARKEDBYTEACHERS.COM	NBCUniversal @ YouTube
MIXED	MASHABLE.COM	NBCUniversal International @ YouTube
MIXED	MATHSGENIE.CO.UK	Nerdist Alliance @ YouTube
MIXED	MATHSISFUN.COM	NewMediaRockstars @ YouTube
MIXED	MENTALFLOSS.COM	pias @ YouTube
MIXED	METROLYRICS.COM	razbuten @ YouTube
MIXED	MOMJUNCTION.COM	Reel Truth Documentaries @ YouTube
MIXED	MYANIMELIST.NET	RoosterTeeth.com @ YouTube
MIXED	NAMEBERRY.COM	RouteNote @ YouTube
MIXED	NAME-GENERATOR.ORG.UK	SamSmithWorldVEVO @ YouTube
MIXED	NEXUSMODS.COM	Sky News @ YouTube
MIXED	PCGAMER.COM	Sky Sports @ YouTube
MIXED	PHYSICSANDMATHSTUTOR.COM	Smarter Every Day @ YouTube
MIXED	POLYGON.COM	SonyBMG @ YouTube
MIXED	PRIMARYFACTS.COM	Steel Banglez @ YouTube
MIXED	PRNT.SC	Stormzy @ YouTube
MIXED	PSYCHCENTRAL.COM	TaylorSwiftVEVO @ YouTube
MIXED	RAPIDTABLES.COM	TED Talks @ YouTube
MIXED	READERSDIGEST.COM	The Orchard @ YouTube
MIXED	REDDIT.COM	TheTelegraph @ YouTube
MIXED	REVISIONMATHS.COM	TravisScottVEVO @ YouTube

Category	Sites	
MIXED	REVISIONWORLD.COM	UMG @ YouTube
MIXED	ROCKPAPERSHOTGUN.COM	Vanity Fair @ YouTube
MIXED	SCREENRANT.COM	VEVO @ YouTube
MIXED	SELFBUTLER.COM	VICE YouTube Network @ YouTube
MIXED	SHEKNOWS.COM	Vox Media @ YouTube
MIXED	SLATE.COM	Warner Bros (The Ellen Show) @ YouTube
MIXED	SOCIALBLADE.COM	Warner Music @ YouTube
MIXED	SOFTONIC.COM	watchmojo @ YouTube
MIXED	SPACE.COM	Wendoverproductions @ YouTube
MIXED	SPINXO.COM	wocomo entertainment @ YouTube
MIXED	STREAMING-TIME.COM	Woven Digital Studios @ YouTube
MIXED	TECHCRUNCH.COM	WWE J5v_MCY6GNUBTO8-D3XoAg @ YouTube
MIXED	THESAURUS.COM	Young Thug Channel @ YouTube
MIXED	THESTUDENTROOM.CO.UK	
MIXED	THETOPTENS.COM	
MIXED	THOUGHTCATALOG.COM	
MIXED	THOUGHTCO.COM	
MIXED	TIGER-ALGEBRA.COM	
MIXED	TIME.COM	
MIXED	TOPMARKS.CO.UK	
MIXED	TWINFINITE.NET	
MIXED	UCAS.COM	
MIXED	URBANDICTIONARY.COM	
MIXED	VARIETY.COM	
MIXED	VG247.COM	
MIXED	VOGUE.CO.UK	
MIXED	WIKIHOW.COM	
MIXED	WORDHIPPO.COM	
MIXED	YAHOO.CO.UK	
MIXED	ZESTRADAR.COM	

Category	Sites	
ADULT	AOL.CO.UK	MUMSNET.COM
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