

ASA Monitoring Report on Online HFSS Ads



Executive Summary

The Advertising Standards Authority (the ASA) is the UK's independent advertising regulator. We have been administering The UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (written and maintained by the Committee of Advertising Practice) for 57 years and The UK Code of Broadcast Advertising (written and maintained by the Broadcast Committee of Advertising Practice) for 15 years. We are responsible for ensuring that advertising is legal, decent, honest and truthful.

The Advertising Codes include rules to protect people who are vulnerable, including children (which the Codes define as those aged 15 and under) and young people (those aged 16 and 17). They include rules on the scheduling and placement of ads to ensure that children and young people's exposure to particular categories of advertisements, Alcohol, Gambling, and foods soft drinks which are high in fat, salt or sugar (HFSS), is appropriately limited. The rules ban ads for HFSS products in children's media, and, where they appear in media targeting a general audience, the content cannot condone poor nutritional habits or an unhealthy lifestyle in children, promote peer power or mislead as to the nutritional or health benefit of the product as a whole. Additional restrictions apply to HFSS ads directed through their content at children under 12.

This report provides an overview of online display advertising of food and soft drinks which are high in fat, salt, or sugar (HFSS) and an insight into the targeting / delivery of HFSS ads to different internet users. The report provides indicative information on levels of compliance with the CAP Code rules on advertising of HFSS products but does not provide insight into exposure levels of specific audiences.

This report represents the ASA's first comprehensive survey of online display advertising conducted using automated data capture technology and online profiles which mimic those of internet users of different ages – Avatars. As a result there is no comparative data over time. In addition, the monitoring exercise was not intended to replicate the online behavior of children, so it is not reasonable to extrapolate exposure levels from the data.

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, twice a day, is obviously not reflective of children's actual day-to-day browsing behaviour.¹ 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 exposure levels from the data.

The monitoring exercise did not identify any clear evidence of HFSS advertisers actively targeting child profile Avatars, or serving ads which were directed, through their content, at children under 12 through use of celebrities or licensed characters popular with children or promotions.

¹ The full list of the URLs in the Media Universe can be found in Appendix 1

Some key findings were:

All Ads

- 2.4% of all ads served across the monitoring period were for HFSS products.
- The 2,312 ads for HFSS products represented 69.9% of the 3,306 food ads served during the monitoring period.
- 4.6% of all ads served were for Gambling products and 0.1% were for Alcohol.

Ads Served to Child Avatars²

- 2.3% (947) of all ads served to Child Avatars were for HFSS products.
- More than two-thirds of the HFSS ads served to Child Avatars (647) were for products likely to be of little interest to children e.g. supermarkets, high-end cheese, condiments.

Ads Served on Children's Websites:

- 26 of the 39 websites in the monitoring exercise which were clearly aimed at children did not serve a single ad for an HFSS product.
- 43 ads for HFSS products were served on 13 websites clearly aimed at children.
- The 43 HFSS ads represented 0.5% of all ads served on those 13 children's websites and 1.3% of all food ads served during the monitoring exercise.

Ads Served on Children's YouTube Channels:

- Ads for HFSS products appeared on 20 of the 21 YouTube channels included in the initial monitoring sample, which were clearly aimed at children.
- As the Avatars viewed related videos on these channels (often appearing on other YouTube channels), the monitoring exercise identified a total of 490 ads for HFSS products served alongside videos on 55 YouTube channels aimed at children.
- The 490 HFSS ads represented 2.3% of all ads served on children's YouTube channels for which we have data, and 91.9% of all HFSS ads served in children's media during the monitoring exercise.

² The monitoring exercise included three Avatars which could be considered Child Avatars and thus inappropriate for dynamically-targeted HFSS Ads – Child A; Child B; and Teenager.

The Avatar monitoring exercise does not include information on ads served on social media. In conjunction with the Avatar monitoring the ASA monitored the websites and publicly-available social media content of 50 major food brands. This monitoring exercise did not include ads served to logged-in users on social media.

The Social Media Monitoring found that the brands generally complied with the requirements of the CAP Code regarding promotions and content which may appeal to children, for example by not using licensed characters or celebrities popular with children. The monitoring exercise did identify some issues with games and downloadable activities which could appeal to children on the websites of four advertisers, but only one of these was considered likely to have breached the CAP Code Rules.

By providing an overview of the current context of online advertising of HFSS products, the ASA seeks to better inform the debate about the effectiveness and the proportionality of the rules that currently restrict their advertising. The ASA welcomes feedback on the report.

Introduction

In July 2017 the Committee of Advertising Practice (CAP) introduced a new targeting rule for non-broadcast HFSS food and soft drink advertising (HFSS ads).³

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.

This monitoring exercise forms part of the ASA's 12-month review of the impact of the non-broadcast HFSS ad rules, predominantly Rule 15.18.

The monitoring exercise represented a first step by the ASA in using data capture technology to support monitoring work and advertising regulation. In order to support effective future monitoring of trends and patterns in non-broadcast advertising, this monitoring exercise is intended to provide an insight into the targeting/delivery of HFSS ads to different internet users. It is not intended to provide a representation of the level of exposure to HFSS online display ads to specific age-groups. The monitoring exercise also collected information on online display advertising of other age-restricted advertising categories (alcohol and gambling).⁴

Online display ads can be served dynamically and are often targeted to audience groups using the browsing history of individual users. The online marketplace is broad and varied; marketing communications targeted at UK consumers appearing on a vast range of different websites could fall within the ASA's remit and be subject to the CAP Code's rules on age-restricted ads. As a result, monitoring ads on a suitably representative sample of websites through manual data capture methods would be exceptionally difficult. Therefore the ASA considered that a technology-assisted approach would be necessary to effectively monitor online display ads.

The ASA commissioned Advertising Intelligence Ltd, a subsidiary of global marketing and media analytics company Nielsen, to monitor online display ads served to UK consumers. This monitoring exercise used 'Avatars', constructed online profiles which closely mimic the online profiles of an internet user of a particular age profile.

³ *Tougher new food and drink rules come into effect in children's media* CAP News 30 Jun 2017 <https://www.asa.org.uk/news/tougher-new-food-and-drink-rules-come-into-effect-in-children-s-media.html>

⁴ The ASA published the initial outcomes of their enforcement work involving gambling ads on children's websites in April 2019. Additional findings relating to gambling and alcohol will be published at a later date. www.asa.org.uk/news/harnessing-new-technology-gambling-ads-children.html

The seven 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
Teenager⁵	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	Control profile with no cookies at all to indicate a specific age profile
Retargeting	This profile was not designed to replicate a specific age profile but visited the websites of 50 major food, alcohol, and gambling Brands to establish whether they were delivering targeted ads to internet users who had previously visited their websites ⁶

The seven Avatars visited a Media Universe of 250 URLs (addresses of a World Wide Web page) selected from the most popular websites for UK consumers on both desktop and mobile twice a day.⁷ 105 URLs were characterised as being of appeal to a ‘general audience’, 105 had ‘youth interest’ and 40 YouTube channels, primarily ‘youth interest’ with some ‘general audience’. On each visit the Avatars viewed the main URL and one additional associated page/video on the site/channel.

The findings provide a snapshot of the current context of online display age-restricted ads to UK consumers. The monitoring does not include all forms of online marketing which may fall under the remit of the CAP Code, for example, Influencer Marketing, ads in Apps, Audio Streaming Ads.

The Avatar monitoring exercise captured information on ads served to non-logged-in users. Future Avatar monitoring will look to extend this work to logged-in environments, especially logged-in social media platforms.

Although we did not collect data on ads served to logged-in social media users, much of the non-paid content posted on social media by brands is visible to non-logged-in users and falls within the ASA’s remit.⁸ Conventional manual data-capture monitoring was therefore conducted into the marketing content on the websites and publicly-accessible social media accounts of 50 major UK food and drink brands popular with younger consumers, in order to assess compliance with the HFSS targeting and creative content rules.

⁵ The Teenager profile includes some websites which may be of interest to older teenagers but the balance of categories mean that the Teenager Avatar should be identified as under-16 and so will be considered a Child Avatar in the report alongside Child A and Child B.

⁶ The full list of Brand websites used to compile the Retargeting Avatar profile can be found in Appendix 1A

⁷ The full list of the URLs in the Media Universe can be found in Appendix 1

⁸ Specific information about non-paid-for content on social media under the ASA’s remit can be found in the Advice Online Article – *Remit: Social Media* (<https://www.asa.org.uk/advice-online/remit-social-media.html>)

Monitoring Approach

The Avatar monitoring was conducted between Monday 26 November and Sunday 9 December, 2018. The seven Avatars made a total of 196,000 website visits during the monitoring period and were served 95,665 ads across all sectors on these visits.

During the same period the ASA monitored openly-available online content from a selection of 50 top UK food and soft drink brands. The monitoring covered content posted on the brands' official websites and social media accounts visible to non-logged-in users. It did not include paid advertising on the social media platforms or information available only to logged-in users.

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, twice a day, is obviously not reflective of children's actual day-to-day browsing behaviour.⁹ 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 exposure levels from the data.

The monitoring exercise was instead intended to provide a snapshot of the current context of online advertising of restricted products and the types of ads seen by different users across the internet. In order to provide an accurate snapshot across the most popular websites in the UK the Media Universe of 210 websites and 40 YouTube channels was compiled from a range of sources.

The list of 210 websites was chosen from the following sources:

- Advertising Intelligence Ltd's own monitoring list (over 800 sites);
- ComScore lists of the top websites for audiences aged 6-12 and 13-17 (over 300 sites);
- A list of categorised websites appealing to 6-17 year olds from Alexa, Amazon's online audience analytics tool (c200 sites).

The Media Universe was constructed to include a selection of high-ranking websites likely to be of interest to adults; to general internet users; and those which would be of interest to younger internet users. The URLs were selected to cover a range of interests which would appeal to all users and to children in particular, for example, music, films, celebrities, TV, gaming, sport, fashion, beauty, humour, health and fitness, education, news and technology.

The monitoring exercise was focused on ads directed to UK consumers. High-ranking websites on the monitoring lists which are specifically directed at consumers in other countries, for example <http://Bom.gov.au> (the Australian government weather website) and <http://Fafsa.ed.gov> (the US student loan website) were excluded from the sample. However, in instances where a UK-specific version of a site existed – for example www.nick.com or www.buzzfeed.com – then the UK-focused URL was included (www.nick.co.uk and www.buzzfeed.co.uk).

⁹ The full list of the URLs in the Media Universe can be found in Appendix 1

Each website selected for the Media Universe was reviewed to ensure ads were served either on the front page or within internal pages. Websites which did not clearly serve ads under these criteria were excluded. This led to the exclusion of several high-profile and highly-ranked websites from the ComScore and Alexa lists which did not, at the time of inspection, appear to serve display ads, such as bbc.co.uk; itv.com; Netflix.co.uk; xbox.com; lego.com; starwars.com.

The monitoring exercise used recently developed technology to capture detailed information on ads served before and during videos on YouTube channels. YouTube channels tend to serve ads based on the location of the user rather than the location of the channel, so many of the ads served to YouTube users in the UK fall under the ASA's remit. As a result a wide range of YouTube channels based outside the UK were eligible for monitoring.

The list of YouTube channels was compiled from Advertising Intelligence's own monitoring list of YouTube channels appealing to 6-17 year olds and a selection from YouTube channels with the highest numbers of subscribers which were likely to appeal to younger viewers.

The final Media Universe of 250 URLs contained 105 websites with general appeal from Advertising Intelligence's monitoring list; 105 websites which appeared on the ComScore and Alexa lists of websites appealing to children; and 40 YouTube channels likely to be of interest to younger viewers.¹⁰

To develop the age profile of each Avatar, Advertising Intelligence used their pre-existing model to create a selection of 20-25 age-specific sites for each Avatar to visit in order to receive cookies. Advertisers could then use the profile of the Avatar, including the age inferred by the profile, as a basis for serving targeted ads.

The Retargeting Avatar visited a selection of 50 websites for brands selling products that are restricted by age in terms of their advertising and, generally, their sale¹¹ in order to establish whether these brands were serving retargeted ads based on the Avatar's interest in these products.¹² The Brand websites were chosen from a selection of research into food and soft drink brands popular with young people in the UK¹³; information from BARB on brands with high TV advertising spends; and brands which had, in the past, fallen foul of food and soft drink rules designed to protect children from irresponsible marketing, including through HFSS marketing 'advergames'.¹⁴

Advertising Intelligence collected information regarding banner ads, in-line ads, video ads on webpages, and pre-roll ads on YouTube videos. Every ad which was captured was categorised using Advertising Intelligence's database to establish the brand and the nature of the product being advertised.

¹⁰ The full list of URLs included in the final Media Universe can be found in Appendix 1. During preliminary research Advertising Intelligence established that 8 of the 250 URLs in the original Media Universe were not serving ads to the Avatars – these were replaced with equivalent websites from the lists.

¹¹ The full list of Brand websites used to compile the Retargeting Avatar profile can be found in Appendix 1A

¹² The Retargeting Brands List was weighted towards Gambling and HFSS Brands with only a small number of Alcohol brands as most UK-based Alcohol Brand websites had age-restrictions in place which prevented users under 18 from viewing the websites. The Retargeting Avatar was not programmed to insert dummy categories to bypass such restrictions in order to receive cookies.

¹³ Headstream: *Social Brands 100* and *Social Brands 100 FMCG* (both 2014); Voxburner: *Youth 100* (2014); Harris Interactive *Kids 100 Index* (2011).

¹⁴ *Advergames* CAP News 17 May 2012 <https://www.asa.org.uk/news/advergames.html>

Every ad which fell into the indexed categories for monitoring – Food; Soft Drinks; Food Retail; Gambling; Alcohol – was individually logged and saved alongside details of:

- Date and Time Served
- URL of the Page/Video visited (and a screenshot of the ad in context)
- URL of the landing page resulting from clicking on the ad
- Whether the ad was seen on Mobile or Desktop
- The positioning of the ad (e.g. banner; mid-page; wrap-around; pre-roll video)

Only the ads which fell into the above categories were logged, saved, and made available to the ASA. The categories were chosen to give the broadest sample of ads which were most likely to feature restricted products. The Food Retail category included restaurants – which were likely to feature food in their ads – and supermarkets, many of which advertise ranges such as clothing and homewares in addition to food and drinks.

Each individual ad captured in the Avatar monitoring was viewed on a case-by-case basis to establish whether it featured restricted products, including an HFSS food or soft drink, as opposed to a non-HFSS food or soft drink. As a result the Avatar monitoring focused only on those sectors where restricted products were most likely to appear in ads. The ASA's research, *Children's Exposure to Age-Restricted TV Ads* (2018), included, for example, ads for Theme Parks, Cinemas, Gyms and Leisure Activities. The creative content of ads in these categories may contain HFSS products but they were not included in the Avatar monitoring.¹⁵

¹⁵ The TV advertising research used some data which had been pre-validated by BARB 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.

Avatar Monitoring Findings

Some key findings are:

- 3.5% of all Ads served were for Food or Soft Drinks
- 'Clear and Likely HFSS Ads'¹⁶ represented 2.4% of all Ads served and 69.9% of all Food and Soft Drinks Ads
- Gambling Ads represented 4.6% of all Ads served
- Alcohol Ads represented less than 0.1% of all Ads served

Again, the Avatar monitoring exercise was not intended to replicate the actual online browsing behaviour of children. The exercise was intended to monitor compliance with the CAP Code rules on advertising of HFSS products. The data captured in the monitoring exercise represents real world ad impacts, but the monitoring activity, such as visiting the Financial Times website multiple times a day, every day, for a fortnight, does not replicate the normal internet browsing behaviour of a seven-year-old child.

Of the 95,665 ads served to the seven Avatars during the monitoring exercise, around 10% (9,612) were in the categories of Food, Soft Drinks, Food Retail, Alcohol, and Gambling.¹⁷

4,420 ads (4.6%) were for Gambling products. The monitoring exercise allowed the ASA to quickly identify and take immediate enforcement action against five gambling operators who had clearly breached the CAP Code by serving ads to Child Avatars on websites aimed at children¹⁸.

Just 73 of the 95,665 ads were for Alcohol products (less than 0.1%). The monitoring did not identify any instances where Alcohol ads were served to Child Avatars on websites clearly intended for children. The individual ads were assessed and their content considered unlikely to appeal to children. 43 of the ads were served were for a supermarket Christmas drinks offers. 24 ads were for two whisky brands, the remaining six ads were for an online alcohol delivery service.

Ads for Food Retail brands (including supermarkets) were served 3,485 times (3.6% of all ads served) and Food and Soft Drinks ads were served 1,532 times (1.6% of the total).

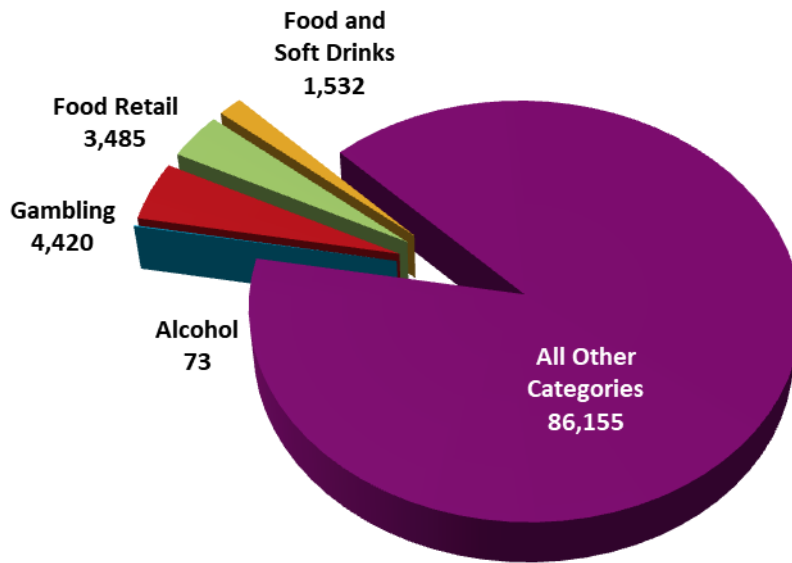
The chart below shows the spread of categories across the 95,665 ads served during the monitoring exercise.

¹⁶ A 'Clear or Likely HFSS Ad' is one which advertises products which can clearly be identified as HFSS, promotes a brand which is inherently linked with HFSS products, or advertises products where a clear nutrient profile cannot be established but which, based on similar products, is likely to be HFSS.

¹⁷ The 9,612 figure includes instances of brands which sell food but are advertising other products in specific ads (e.g. supermarkets with clothing or homeware brands).

¹⁸ The monitoring data identified 151 instances where gambling operators had served ads to Child Avatars on websites clearly intended for children. The ASA contacted these operators who all provided assurances that the ads would not appear on those websites again and that they had revised their ad serving policies to prevent future breaches of this kind. This outcome from the Avatar monitoring exercise was published in April 2019: www.asa.org.uk/news/harnessing-new-technology-gambling-ads-children.html

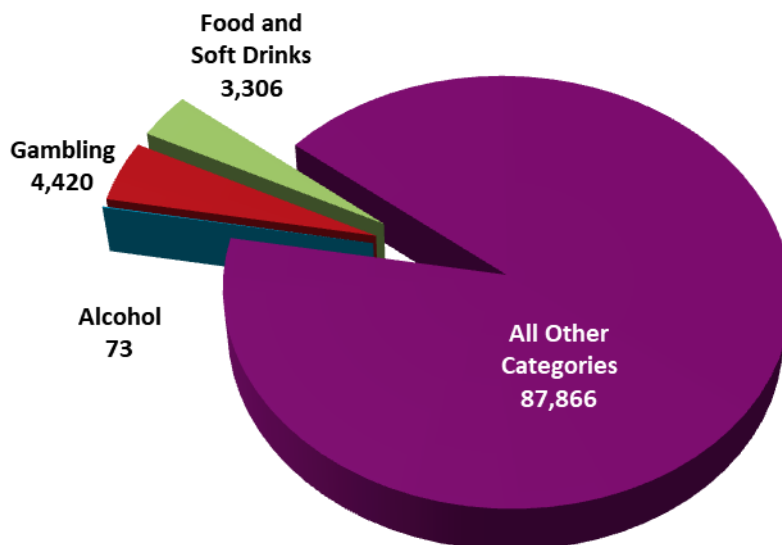
Number of Ads Served by Category



Of the 5,017 ads for Foods, Soft Drinks, and Food Retail brands which could be accurately categorised, 1,711 ads were not related to food products (for example promoting a supermarket's clothing or homeware range). This meant that of the 95,665 ads captured in the monitoring exercise 3,306 (3.5%) were ads for Food and Soft Drinks.

The following chart shows the consolidated numbers for Food and Soft Drinks; Gambling; and Alcohol compare with the other ad categories.

Number of Ads Served in Consolidated Categories

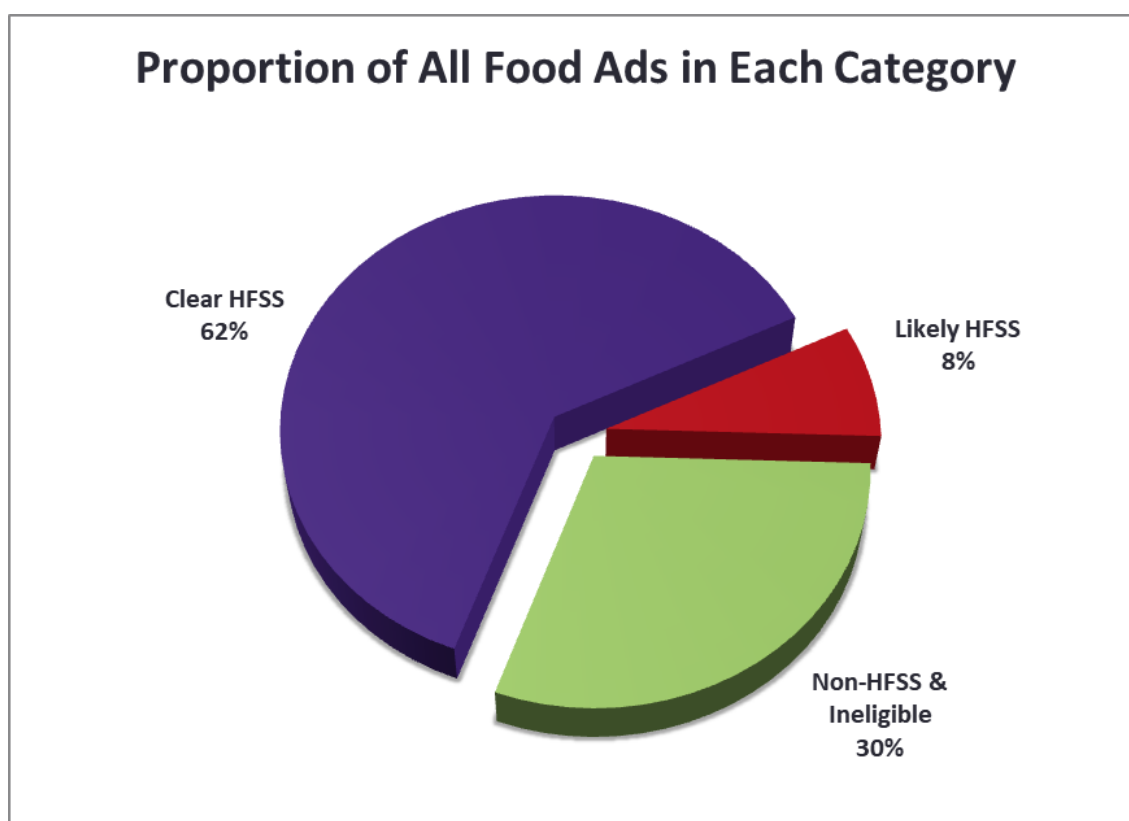


462 unique Food and Soft Drinks ads were served a total of 3,306 times during the monitoring exercise. Each of the 462 ads was assessed to establish whether it featured products or brands which were subject to the HFSS restrictions. The Department of Health and Social Care [Nutrient Profiling Model](#) (NPM) established in January 2011 was used to determine whether the 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.¹⁹

Ads for products that are ineligible to be profiled against the NPM – baking ingredients, meal kits, cooking oil, tea and coffee etc. – were served 432 times. Ads featuring only foods which were clearly not HFSS or brands which were not inherently associated with HFSS products were served 463 times. Ads for Recipe and Meal Plans were served on 99 occasions.

This left 2,312 instances (2.4% of all ads served) in which the ads served were:

- Clearly for or featured HFSS products;
- Linked to brands likely to be synonymous or very strongly associated with HFSS; or
- For products likely to be HFSS but for which a clear nutrient profile could not be established.



¹⁹ 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
And McCance and Widdowson here: www.gov.uk/government/publications/composition-of-foods-integrated-dataset-cofid

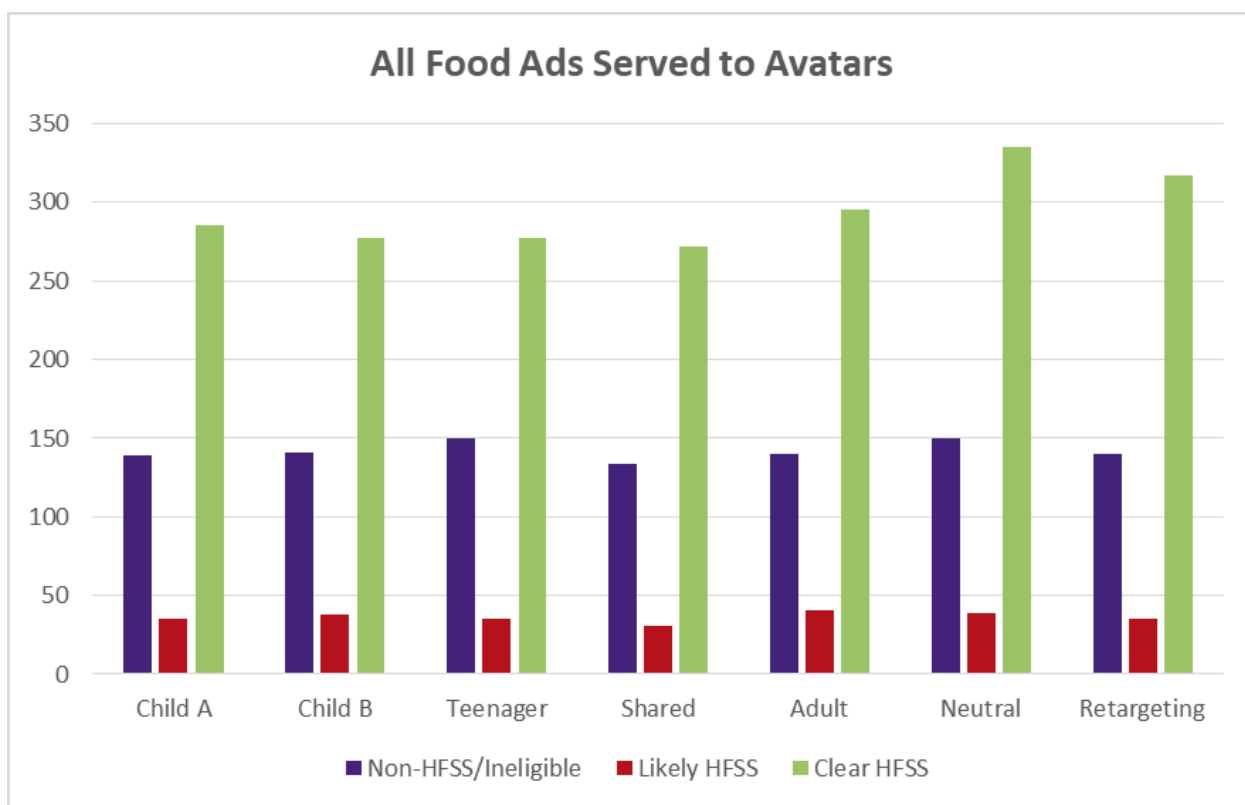
Distribution of Ads across Avatars

Key findings:

- Child Avatars were served fewer HFSS Ads than Adult Avatars
- The Neutral Avatar was served the most HFSS Ads across all audience-type websites and YouTube channels

When the ads had been categorised it was possible to establish the particular distribution of the food and soft drinks ads in each category to each of the Avatars.

The chart below shows the distribution of these ad categories across the seven Avatars.



Avatar	Food Ad Category			Total
	Non-HFSS/ Ineligible	Likely HFSS	Clear HFSS	
Child A	139	35	285	459
Child B	141	38	277	456
Teenager	150	35	277	462
Shared	134	31	272	437
Adult	140	41	295	476
Neutral	150	39	335	524
Retargeting	140	35	317	492

The Neutral Avatar, which had no browser cookies to indicate an age profile, received the most food ads across each category. Conversely, the Shared Avatar, which replicated the browsing behaviour of an adult and a child sharing a device, was served the fewest food ads in every category. The Neutral Avatar was served more food ads than even the Retargeting Avatar, which had cookies from 28 food and soft drink brands in its browsing history.

Serving an HFSS ad on a general interest website to a user with no browsing history to indicate an inferred age – as is the case with the Neutral Avatar – may not be a clear breach of the CAP Code. However, this could be an indicator that advertisers are not applying all available mechanisms to limit exposure to age-restricted ads.²⁰

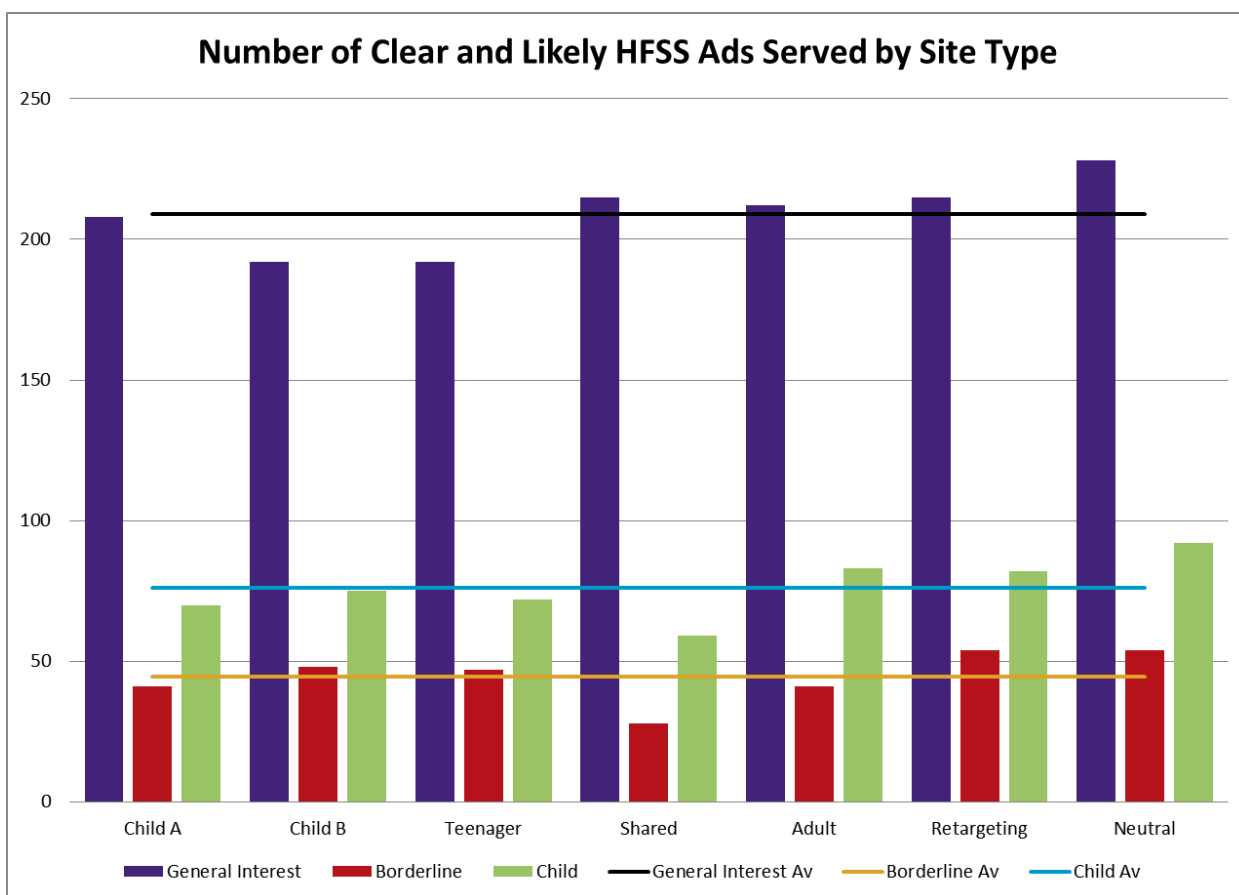
The Neutral, Retargeting, and Adult Avatars were served the most food ads overall and the most 'Clear or Likely HFSS Ads' during the monitoring exercise. This would appear to indicate that HFSS Brands used some targeting mechanisms to avoid serving ads to the Child Avatars (Child A; Child B; Teenager).

²⁰ Without access to information about ads outside of the indexed categories it is not possible to establish what ads were served to the Shared Avatar when the Neutral Avatar was served HFSS ads. It would seem unlikely that HFSS Brands actively targeted users with a blank cookie history (the Neutral Avatar) but the difference could be a result of greater competition to serve ads to users where useful demographic information is available. The mixture of cookies linked to the Shared Avatar could lead ad tech to infer that the user is a parent – a key market for a range of products, not just HFSS foods – which may have led to the Shared Avatar being served ads for a wider variety of products.

The monitoring exercise also provided information about the websites on which ads were served to each Avatar. The 250 URLs in the Media Universe were evaluated and categorised as either:

Child Sites	39 websites and 21 YouTube channels with content clearly intended for under-16s.
Borderline Sites	24 websites and 15 YouTube channels likely to have a significant audience of under-16s which could exceed 25% of the total and so make the site subject to the HFSS Ad placement restrictions in the CAP Code.
General Interest Sites	147 websites and 4 YouTube channels which do not have particular appeal to children and where under-16s are unlikely to represent more than 25% of the audience. ²¹

The chart below shows the categories of websites and YouTube channels on which each Avatar was served 'Clear or Likely HFSS Ads'.



²¹ The full Media Universe include audience age categorisations can be found in Appendix 1

Adult, Neutral and Retargeting Avatars all saw a higher than average number of Clear or Likely HFSS Ads on General Interest Sites and Child Sites. This may be a further indication that ads for HFSS products were not actively targeting Child Avatars.

As the Child Avatars visited the same General Interest websites as the other Avatars it is possible a significant proportion of the Clear or Likely HFSS ads appearing on these websites were served to all visitors and not dynamically-targeted. The monitoring data did not identify any clear indications of active targeting of Child Avatars with 'Clear or Likely HFSS Ads' which would merit intervention or further investigation.²² The section below on Targeting looks at broader trends which can be identified within the data regarding how 'Clear or Likely HFSS Ads' for individual brands were served.

²² The monitoring exercise data did not contain detailed information on each of the 95,665 ads served. Only the 9,612 ads in the indexed categories – Food; Soft Drinks; Food Retail; Gambling; Alcohol – were logged in detail. Therefore it is not possible to establish which ads beyond these categories were served to each Avatar which visited a website at a particular time. Without this information it is not possible to clearly demonstrate whether individual HFSS ads were targeted at certain Avatars and not at others. Information from the monitoring data alone cannot be taken in isolation as a clear indication of inappropriate use of dynamic targeting. Any concerns about potentially inappropriate dynamic targeting would require contacting individual advertisers to establish the targeting and filtering mechanisms they had in place on their campaigns. Although ads for some brands were found to have been served disproportionately to certain Child Avatars further investigation on an ad-by-ad and site-by-site basis found that these patterns were less pronounced and likely not sufficient to launch proactive investigative work.

Ad Content

Key findings:

- The monitoring exercise did not identify any HFSS Ads directly targeted at children through their content or use of licensed characters.
- Several advertisers, particularly supermarkets, included Christmas imagery in their HFSS Ads but this was not targeted at children.

The CAP Code includes prohibitions on the use licensed characters and celebrities popular with children in HFSS Ads.

15.15 *Licensed characters and celebrities popular with children must be used with a due sense of responsibility. HFSS product advertisements that are targeted directly at pre-school or primary school children through their content must not include licensed characters or celebrities popular with children. For the avoidance of doubt, that prohibition applies to food or drink advertisements only.*

The prohibition does not apply to advertiser-created equity brand characters (puppets, persons or characters), which may be used by advertisers to sell the products they were designed to sell.

Licensed characters and celebrities popular with children may present factual and relevant generic statements about nutrition, safety, education or similar.

720 unique Food, Soft Drink, and Food Retail ads were captured during the monitoring. These ads were assessed to establish whether they contained food or soft drinks products subject to the restrictions of Section 15 of the CAP Code

Ads Served to All Avatars		
Category	Number of Unique Ads	Total Ad Impressions
Not an Ad for Food	258	1711
Ineligible Food Product	127	531
Non-HFSS Food or Drink	50	463
Likely HFSS	30	254
Clear HFSS	255	2058

All 258 Unique Ads in the 'Not an Ad for Food' category promoted the non-food ranges of supermarkets, such as homewares, clothing, and Christmas decorations. Marks & Spencer were responsible for 1,674 (97.8%) of the 1,711 occasions on which such ads were served to the Avatars.

155 of the 'Clear or Likely HFSS' ads were not served to any of the Child Avatars. The remaining 130 of the 285 'Clear or Likely HFSS' ads were served to the Child Avatars on 947 occasions by a total of 38 brands. These 130 ads were assessed in further detail to establish whether they contained a promotional offer, or a licenced character or celebrity popular with children, and whether they were targeted directly at pre-school or primary school children through their content.

Reflecting the time of year when the monitoring exercise was conducted, several ads, particularly those for supermarkets, contained Christmas imagery. However, none of the 130 ads contained content which explicitly appealed to children; had they, they would not have fallen foul of the rules unless they included celebrities or licensed characters popular with children or promotional offers.²³ There were no ads amongst the 130 served to Child Avatars which featured licensed characters, equity brand characters, or celebrities popular with under-16s.²⁴ The absence of licensed and equity brand characters (which are permitted to be used in HFSS ads, the content of which is directed at children) in the 'Clear or Likely HFSS ads' served to Child Avatars might be taken to indicate that brands are exercising caution in their online advertising.

²³ One Marks & Spencer YouTube ad featured an 11-year-old child receiving a surprise of Christmas-themed macaroons, but the content was not directed at children and so the ad was not considered likely to breach the CAP Code Rules relating to ads featuring children.

A short YouTube ad for Nutella featured a child eating Nutella on Christmas-tree shaped toast in a family kitchen. The content of the ad, including the voiceover "...spread some extra happiness at breakfast...", was not targeted at children and the ad did not contain a licensed character or celebrity popular with children.

²⁴ A series of Marks & Spencer YouTube ads *What's New at M&S Food* featured the celebrities Emma Willis, Rochelle Humes, Amanda Holden, Paddy McGuinness, and Keith Lemon. Although these celebrities would be known to children they were not considered to be particularly popular with under-16s and the content of the ad – informal reviews of party food – was not directed at children.

Product Types

Some key findings were:

- The five brands with the most HFSS ads in the monitoring exercise advertised products unlikely to appeal to children. However, fast food and snack food brands appeared amongst the top ten.
- Supermarkets were responsible for over half of the HFSS Ads served to Child Avatars in the sample.
- 0.8% of all HFSS ads served to Child Avatars were for HFSS Soft Drinks

The monitoring exercise also provided an insight into the types of products featured in the 'Clear or Likely HFSS Ads' served during the study. The table below shows the ten brands who served 'Clear or Likely HFSS Ads' the most times during the monitoring exercise.

Clear and Likely HFSS Ads Served to All Avatars								
	Child A	Child B	Teenager	Shared	Adult	Neutral	Retargeting	Total
Marks & Spencer	81	64	81	70	76	89	71	532
Grana Padano	35	46	46	50	45	50	38	310
Asda	25	18	36	21	35	36	39	210
Lidl	29	22	27	23	21	30	25	177
SuperValu	21	20	24	20	23	21	24	153
McDonald's	18	25	16	15	19	19	19	131
Kellogg's	15	21	12	20	17	19	17	121
Mod Pizza	10	10	10	10	10	8	10	68
Pringles	11	15	7	10	5	8	4	60
Papa John's							54	54

As the table shows, four of the top five brands which served the most 'Clear or Likely HFSS Ads' were supermarkets (the fifth, Grana Padano, is a cheese manufacturer). These top five brands were associated with products unlikely to appeal directly to children.

Marks & Spencer present a good example of a brand which served a large number of ‘Clear or Likely HFSS Ads’ for products which were unlikely to appeal to children. One of the most common Marks & Spencer display ads promoted ‘Christmas & New Year Food to Order’ and featured a photograph of a Beef Wellington – an HFSS product. Neither the presentation of the ad, nor the featured product are likely to be of particular interest to under-16s.

The next five brands on the list include fast food and snack foods which may be of interest to under-16s. Although the products may have been familiar to younger consumers the content of the ads was unlikely to particularly appeal to children.

The following table shows the breakdown of product types in the Clear or Likely HFSS Ads which were served to Child Avatars.

Clear or Likely HFSS Ads Served to Child Avatars		
Product Type	Total Ad Impressions	% of Ad Impressions
Supermarket	493	52.1%
Restaurant/Takeaway	140	14.8%
Cheese	133	14.1%
Snack Food (inc Sweetened Cereals)	115	12.1%
Confectionary (inc Ice Cream & Sweet Spreads)	37	3.9%
Condiments	21	2.2%
Soft Drinks	8	0.8%

Over 50% of the ‘Clear or Likely HFSS Ads’ served to Child Avatars were for Supermarket food products. Many of the Supermarket ads promoted Christmas food ranges which included deserts and party foods. These may be of interest to children but are unlikely to be purchased by under-16s.

The next highest category, Restaurant/Takeaway, represented roughly one in seven of the ‘Clear or Likely HFSS Ads’ served to Child Avatars. This category included several prominent high street brands such as McDonald’s, KFC, and Subway, which would be familiar to children, as well as home delivery services such as Just Eat.

Grana Padano – a product unlikely to appeal to or be purchased directly by children – was responsible for 127 of the 133 Cheese ads served to Child Avatars. The Grana Padano ads were primarily display ads with no content likely to have particular appeal to under-16s.

The two Snack Foods Brands which served the most ads to Child Avatars were Kellogg’s Crunchy Nut and Pringles, both of which may appeal to children. Other products included in the Snack Food section were salted nuts and crackers.

The most common Confectionary Brands were higher-end boxed chocolates and home delivery artisan marshmallows, but this category included some ads for two chocolate brands popular with children and an ice cream company likely to be familiar to children.

The Condiments featured were mayonnaise and mustard, unlikely to be of particular interest to or purchased directly by children.

All the 'Clear or Likely HFSS Ads' for Soft Drinks served to Child Avatars were for mixed coffee products/coffee shops and so unlikely to be of particular interest to or purchased directly by children. Major Soft Drinks brands, including Coca Cola and Pepsi, served ads to the Avatars during the monitoring exercise but only promoted their non-HFSS sugar free ranges.

More than two-thirds of the Clear or Likely HFSS Ads served to Child Avatars were for foods outside of World Health Organisation's 'Big Five'²⁵ categories of foods most commonly advertised to children (soft drinks, pre-sugared cereals, confectionery, snacks, and fast food restaurants).

²⁵ The Restaurant/Takeaway category includes some ads for establishments which may not be considered "fast food" under the WHO criteria, but the three categories clearly outside these criteria (Supermarkets, Cheese, and Condiments) represent 68.32% of all Clear or Likely HFSS Ads served to Child Avatars. Cairns G, Angus K, Hastings G. *The extent, nature and effects of food promotion to children: a review of the evidence to December 2008*. World Health Organization, WHO Press; 2009
www.who.int/dietphysicalactivity/Evidence_Update_2009.pdf

Targeting

Some key findings were:

- The monitoring data did not identify any clear evidence of active targeting of Child Avatars with ads for HFSS products.
- Three brands served a higher than average number of HFSS ads to at least one Child Avatar but the data did not suggest clear inappropriate targeting.

CAP's guidance on advertising age-restricted products online (including HFSS)²⁶ requires that advertisers must not serve dynamically-targeted HFSS ads to audience groups whose age can be inferred as under 16; no HFSS ad must be served to internet users where their submitted date of birth, where relevant, makes them 15 years old or younger. Advertisers may however serve HFSS ads which do not use interest-based targeting in media where under-16s represent less than 25% of the audience.

An HFSS ad which does not contain a promotional offer or a licensed character or celebrity popular with under-16s, served to a Child Avatar on a General Interest website is unlikely to breach the CAP Code if it was untargeted and served to all visitors to that site. However, it is not possible from the current monitoring data to accurately differentiate between ads which were dynamically-targeted and those which were not served using interest-based targeting mechanisms, such as ads served to every visitor to a particular website.

The monitoring data did not include detailed information on ads for products outside the indexed categories (Food; Soft Drinks; Food Retail; Gambling; Alcohol). As a result it was not possible to cross-reference all ads served on a particular site and establish whether one particular Avatar was served 'Clear or Likely HFSS Ads' while others visiting the same site at the same time were served non-indexed ads. Without this information it is difficult to establish from the indexed data alone which individual ads may have been dynamically-targeted and potentially served inappropriately to particular Avatars.

Every instance where a dynamically-targeted age-restricted ad is served to a Child Avatar could indicate that the advertiser is not using appropriate mechanisms to limit exposure to under-16s. However, each instance of a dynamically-targeted ad being served to a Child Avatar is not prima facie evidence that an advertiser has inappropriately targeted children and breached the CAP Code restrictions on HFSS Advertising to under-16s. The monitoring data *can* indicate where brands may have served their ads disproportionately to particular Avatars but without detailed investigation of individual campaigns it is not possible to establish whether this is a result of inappropriate use of restrictions on ad campaigns to limit exposure or even intentional targeting.

²⁶ Advertising Guidance (non-broadcast): Children and age-restricted ads online
www.asa.org.uk/resource/children-age-restricted-ads-online.html

The monitoring data did not identify a clear pattern of ads for brands in the top ten²⁷ being actively targeted at the Child Avatars. One brand in the top ten, Papa John's, served ads only to the Retargeting Avatar, which had visited and received cookies from the Papa John's website and did not serve a single ad to a Child Avatar. This would seem to indicate that Papa John's was successfully using targeting mechanisms to serve ads to specific interested groups and avoid others.

However, the monitoring exercise did identify three brands who served a disproportionate number of 'Clear or Likely HFSS Ads' to specific Child Avatars. In isolation this may not be an indication that those three brands actively targeted the Child Avatars.

Further analysis of the three brands established that the 'Clear or Likely HFSS Ads' were only served to Child Avatars on YouTube channels rather than websites. On an ad-by-ad level there was no clear pattern of 'Clear or Likely HFSS Ads' being served disproportionately to Child Avatars visiting specific YouTube channels. In every instance where a 'Clear or Likely HFSS Ad' was served more than once to a Child Avatar on a particular YouTube channel the ad was also served to an Adult Avatar on the same YouTube channel during the monitoring period.

As a result of these factors it was not possible from the monitoring data alone to identify a clear pattern of inappropriate active targeting of under-16s. However, the analysis of "Clear or Likely HFSS Ads" served disproportionately to Child Avatars highlighted a potential issue with how these ads were served to non-logged-in users on YouTube, which merited further investigation into the media alongside which Clear or Likely HFSS Ads were served.

²⁷ Beyond the Top Ten Brands, comparisons across the seven Avatars are less meaningful as each Brand served fewer than 50 Clear or Likely HFSS Ads in total.

Media Choice

Some key findings were

- Nine out of every ten HFSS ads served on Child Sites during the monitoring exercise appeared on Child YouTube Channels (91.9%).
- 94.5% of the HFSS ads served to Child Avatars on Child Sites during the monitoring period were served on Child YouTube Channels.
- HFSS Ads on Youth Websites represented 0.2% of all ads served to Child Avatars on Youth Websites during the monitoring exercise.

HFSS ads served on Child or Borderline Sites risk breaching Rule 15.18 of the CAP Code, which 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.

The websites and YouTube Channels from the Media Universe categorised as Child Sites are likely to fall into the “...more than 25% of its audience is under 16 years of age.” aspect of this rule. Websites and YouTube channels in the Borderline Sites category may also fall into this category and so be unsuitable for HFSS ads.

The three brands which disproportionately served ‘Clear or Likely HFSS Ads’ to Child Avatars were also found to have served a disproportionate amount of these ads on Child or Borderline Sites. Every ‘Clear or Likely HFSS Ad’ served by these three brands to a Child Avatar on a Child or Borderline Site was served on YouTube.

Further analysis of the YouTube data established that the related video viewed by Avatars during each visit frequently came from a channel outside the original Media Universe. Advertising Intelligence Ltd determined this to be a result of a difference in the presentation of the recommendations engine in the mobile and desktop versions of YouTube. The desktop site primarily displayed recommended videos on the channel currently being watched while the mobile site often displayed recommendations from similar channels not necessarily directly connected to the video currently being viewed.

This meant that several of the 784 instances where ‘Clear or Likely HFSS Ads’ were served to the Avatars on YouTube occurred on channels outside the original Media Universe. As a result the YouTube aspect of the Avatar monitoring incorporated a wider sample than anticipated.

The original Media Universe involved 40 YouTube channels, of which 21 were clearly aimed at children. By following links to related videos, the Avatars collected details of ads in the indexed categories being served alongside 523 videos across 87 General Interest, Borderline and Child YouTube channels during the monitoring exercise. However, because of this anomaly between mobile and desktop it is not possible to provide accurate statistics on the proportion of 'Clear or Likely HFSS Ads' served on individual YouTube Channels.²⁸

The chart below shows the distribution of 'Clear or Likely HFSS Ads' served to all Avatars on Youth Websites and Youth YouTube Channels. 'Youth Sites' encompass Child Sites – those websites and YouTube Channels with content clearly intended for under-16s – and Borderline Sites – those with youth-focused content likely to appeal to under-16s, but for which thorough categorisation would require analysis of proprietary audience data.

Number of Clear or Likely Ads Served by Profile (Youth Sites Only)			
	Websites	YouTube Channels	Grand Total
Child A	8	103	111
Child B	5	118	123
Teenager	4	115	119
Shared	4	83	87
Adult	9	115	124
Retargeting	31	105	136
Neutral	1	145	146

As the chart shows, significantly more 'Clear or Likely HFSS Ads' were served to all Avatars on Youth YouTube Channels than Youth Websites. Of the 846 'Clear or Likely HFSS Ads' were served across all Youth Sites, 784 (92.7%) were on Youth YouTube Channels.

The Youth Website on which the most 'Clear or Likely HFSS Ads' were served to all Avatars was *supercoloring.com* with 13 of such ads. 24 Youth YouTube Channels served 13 or more 'Clear or Likely HFSS Ads'.

²⁸ The monitoring exercise only retained information on ads served in the indexed categories (food, soft drinks, food retail, gambling, alcohol) so aggregate numbers of ads served on YouTube only relate to ads served on the original Media Universe channels and ads served in indexed categories on related channels. It is highly likely that the Avatars visited related channels which did not serve any ads in the indexed categories but this information was not retained as part of the monitoring data.

The 846 'Clear or Likely HFSS Ads' appeared on 20 Youth Websites and 75 Youth YouTube Channels and related to 30 brands. Of the 30 brands, ads for Clear or Likely HFSS products from 28 were served to Child Avatars on 'Youth Sites'. As 'Youth Sites' includes Borderline Sites which cannot be definitively categorised as inappropriate for HFSS ads, not every instance of a 'Clear or Likely HFSS Ad' served on a 'Youth Site' represents a clear breach of CAP Code rules on advertising HFSS products to under-16s.

Just 17 Clear or Likely HFSS Ads were served to Child Avatars on Youth Websites. This represents 0.2% of the 8,862 ads served on the 39 Youth Websites for which we have total ads served data.

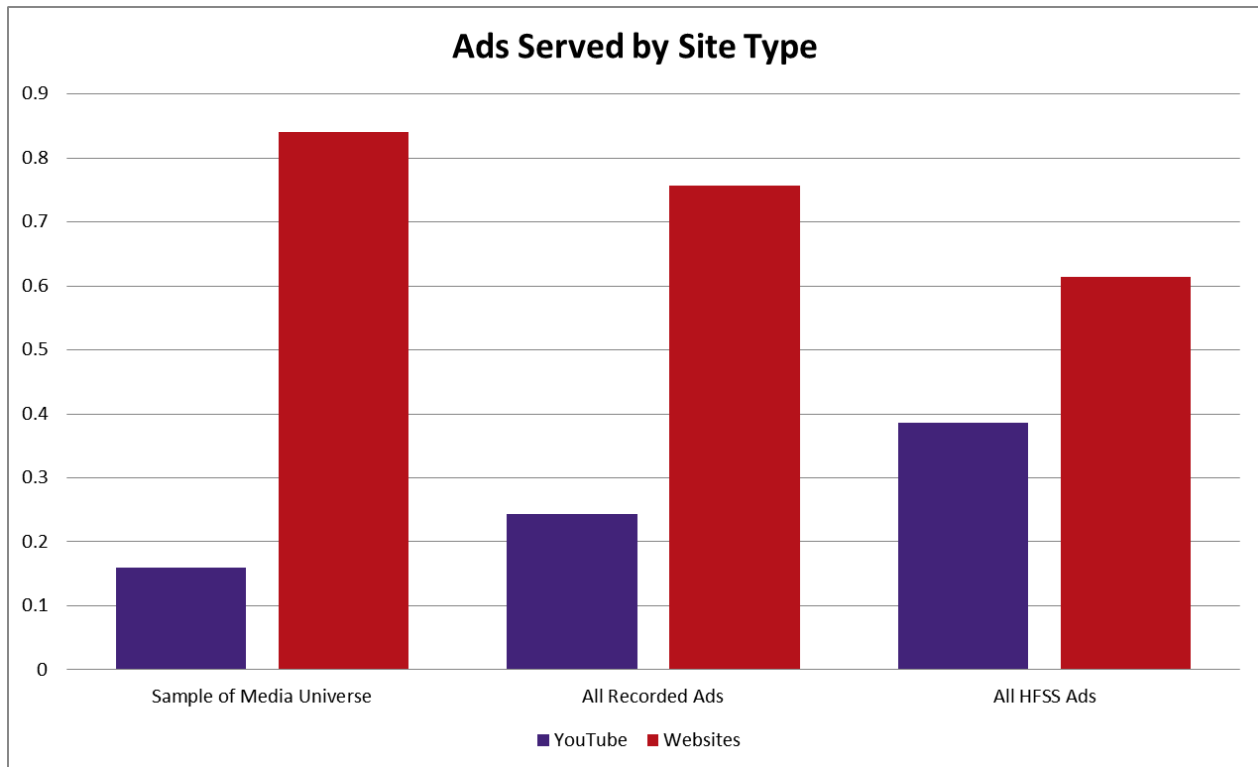
The next chart shows the breakdown of 'Clear or Likely HFSS Ads' served on Child Websites and YouTube Channels only – those which are likely to represent breaches of CAP Code Rule 15.18.

Number of Clear or Likely Ads Served by Profile (Child Sites Only)			
	Websites	YouTube Channels	Grand Total
Child A	6	64	70
Child B	2	73	75
Teenager	4	68	72
Shared	2	57	59
Adult	8	75	83
Retargeting	20	62	82
Neutral	1	91	92

As the chart shows, significantly more 'Clear or Likely HFSS Ads' were served on Children's YouTube Channels than on Children's websites. Of the 533 'Clear or Likely HFSS Ads' identified on Child Sites during the monitoring exercise, 490 were on YouTube (91.9%).

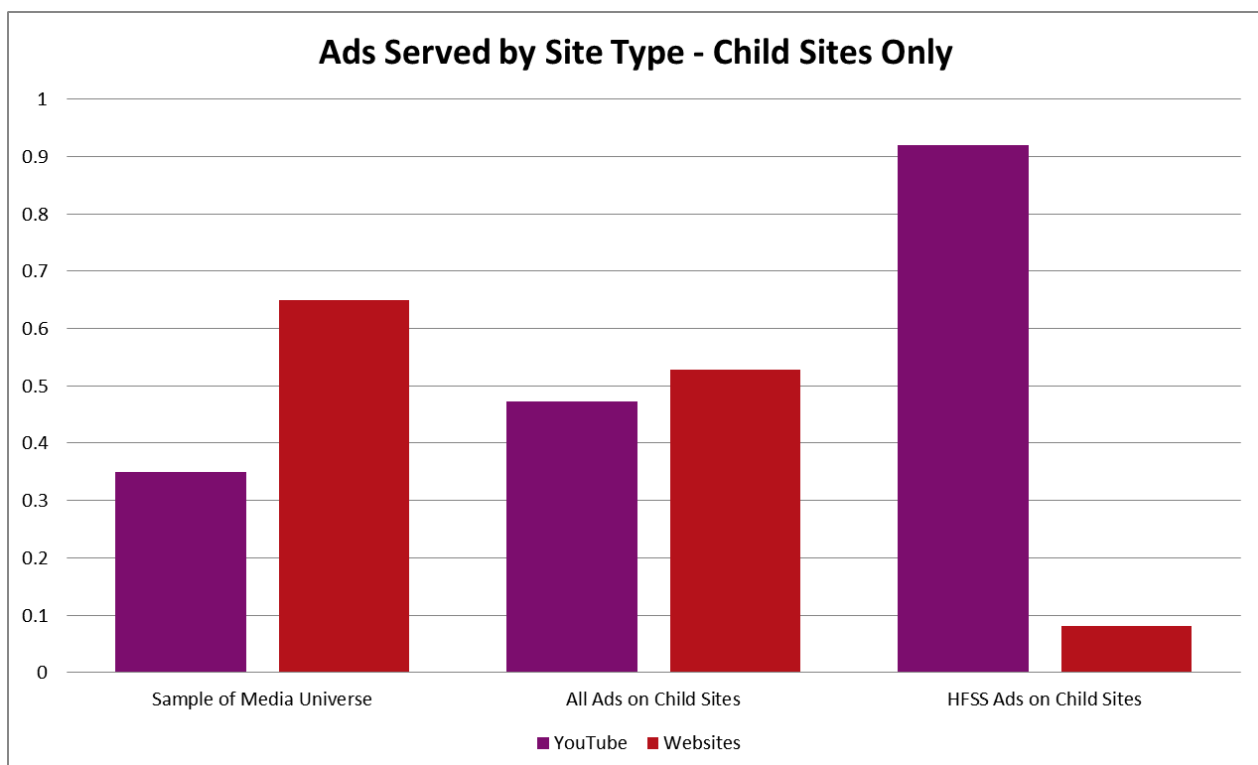
The 490 'Clear or Likely HFSS Ads' on YouTube were served across 20 children's YouTube channels from the original Media Universe and a further 35 related children's channels visited during the monitoring exercise. 43 'Clear or Likely HFSS Ads' were served on 13 of the 39 Children's websites from the original Media Universe. The remaining 26 Children's websites in the original Media Universe did not serve any HFSS ads.

The chart below shows the distribution of ads by site type across the monitoring exercise.



As the chart shows, YouTube channels represented 16% of the original Media Universe. Around one quarter of all ads recorded in the monitoring exercise were served on YouTube (24.3%). More than one in three of the 'Clear or Likely HFSS Ads' recorded during the exercise were served on YouTube (38.6%).

The next chart shows the distribution of ads served on Child Sites only.



As the chart shows, although YouTube channels represented 35% of the original Media Universe sample of Child Sites, almost half of all ads on Child Sites were served on YouTube (47.2%). Nine out of ten 'Clear or Likely HFSS Ads' recorded on Children's Sites during the monitoring exercise were served on YouTube (91.9%).

The pattern of HFSS ads served on clearly child-focused YouTube Channels identified in the monitoring exercise appeared to indicate an underlying issue resulting in multiple breaches of the CAP Code. To address this issue the CAP Compliance Team contacted eight brands who served the most 'Clear or Likely HFSS Ads' to Child Avatars on YouTube. The correspondence focused on the most explicitly problematic findings of the monitoring exercise – instances where 'Clear or Likely HFSS Ads' were served to Child Avatars on Child YouTube Channels.²⁹

²⁹ Details of the CAP Compliance Team's work can be found below in the Monitoring Outcomes section.

Social Media and Brand-Controlled Media Monitoring

Methodology

The Avatar monitoring exercise provided an overview of the current context of online display advertising by food and soft drink brands in the UK but it did not monitor ads posted on social media platforms. Future Avatar monitoring will look to extend this work to logged-in environments, especially logged-in social media platforms. However, it is possible to monitor the publicly-available information on brands' websites and social media accounts with conventional manual data capture techniques.

The brands were selected from a combination of sources, including data from BARB on food brands with the highest spend on TV advertising and existing research into brands which were ranked highly by children and young people.³⁰ A sample of 50 brands across different sectors (soft drinks, confectionary, restaurants etc.) was selected based on their rankings in the lists and their likely appeal to young people. The sample also included brands where problematic online content had been identified in the past, in particular through the use of 'advergames' targeted at children.³¹ Brands which ranked highly under these criteria but which had very limited or no brand-specific UK-focused online content were excluded from the list.

The Brand Controlled Media monitoring looked at the content on the brands' websites, and recent or prominent content on their social media accounts which would be under the remit of the CAP Code.³² The websites and social media accounts were monitored on two separate occasions alongside the Avatar monitoring in the period 26 November 2018 – 9 December 2018. The monitoring involved brand-specific websites and accounts on Twitter, Facebook, Instagram, and YouTube where they existed. Other social networking sites that were only available to logged-in users were not included in the monitoring.

The monitoring exercise focused on online media which was openly visible to all casual users. As none of this content was served through dynamic targeting mechanisms it would not be appropriate to consider it under the HFSS ad placement restrictions of the CAP Code. The primary focus was on whether the online content contained promotional offers, or featured celebrities or licensed characters popular with children.

³⁰ Headstream: *Social Brands 100* and *Social Brands 100 FMCG* (both 2014); Voxburner: *Youth 100* (2014); Harris Interactive *Kids 100 Index* (2011).

³¹ *Advergames* CAP News 17 May 2012: <https://www.asa.org.uk/news/advergames.html>

³² Specific information about non-paid-for content on social media under the ASA's remit can be found in the Advice Online Article – *Remit: Social Media*: <https://www.asa.org.uk/advice-online/remit-social-media.html>

Findings

Key findings:

- Six of the 50 Brands monitored applied age restrictions or required users to log-in to access aspects of their online content
- 20 of the 50 Brands had accounts on one or more Social Media platform with limited recent engagement
- Three brands included branded downloadable resources for children on their website
- One of these brands also included an ‘advergame’ for children on their website.

The 50 brands’ website and social media content did not generally appear to be actively directed at under-12s. Two of the 50 brand websites included an age-gate intended to limit children’s access to the content. Four of the 48 brands with Facebook pages restricted access to logged-in users.

Licensed characters appeared in some form on 11 brands’ current social media or websites but these were either characters unlikely to be popular with children or the content was not directed at children. For example, Cathedral City promoted SpongeBob Square Pants- and Paw Patrol-branded products on their Facebook feed but the posts were aimed at parents, with text such as “*Let us know which character your little one loves most!*” or “*...a perfect lunchbox filler for your kids!*”. The Kinder Facebook feed showed licensed toys such as Barbie and Hot Wheels but the content such as “*Move your kid’s imagination...*” and “*Your little ones can be anything with...*” was directed at parents.

Although several brands included content relating to musicians, sports stars, and video games, which may be of interest to children as well as young adults, there were no instances where this content was specifically directed at under-12s through its presentation.

Many brands used social media platforms primarily to publicise current ad campaigns and promote their products through recipes and lifestyle content targeted at adults.

Websites

All 50 of the brands monitored had a UK-focused website. Two of the 50 websites (Kinder and Twix) had age-gates in place which required users to submit a date of birth to confirm they were over 16 before entering the site.

32 of the 50 websites appeared to have no dedicated child-specific section or youth-focused content. Of the 18 websites with child-specific or youth-focused content, four simply included a section listing their products aimed at children, for example a Kids' Menu at a fast food restaurant – this was primarily informational and likely intended for parents and so unlikely to be considered advertising directed at children. 12 websites contained content – including imagery featuring children – which could interest children but in most cases the context of the website on which the imagery appeared was not considered likely to appeal to children. Just four of these 12 websites contained content intended for children.³³

Twitter

49 of the 50 brands had a brand-specific Twitter account. 10 of the 49 Twitter accounts (Twix, Pom Bear, Snickers, Skittles, M&Ms, Hula Hoops, Fanta, Dr Pepper, Dairy Lea, Chewits) did not have any posts or retweets during the monitoring period or three months prior. These accounts were essentially inactive and the historic content was not considered eligible for the monitoring project. Friij Milkshakes had a brand-specific Twitter account (@FRijj) but in April 2018 this merged with the wider corporate site @MullerUKandI, which had also been included in the monitoring sample.

On the 38 active Twitter feeds the content of the posts was generally adult-focused, in line with the nature of the platform. Some Twitter content included posts and retweets involving licensed characters which may interest children – particularly in relation to Roald Dahl Day, which occurred on 13 September which meant posts relating to the event were in remit at the time of the survey. However, the Twitter posts featuring characters or celebrities who may be of interest to children were not targeted at children through their content and therefore were unlikely to breach the CAP Code in that regard.³⁴

Facebook

48 of the 50 brands had a brand-specific Facebook page. Four of these (Doritos, Pringles, Walkers, and Rowntree) could only be accessed by logged-in Facebook users. This meant that the content on these pages was not eligible for monitoring and may have been a measure through which the advertisers were attempting to limit exposure to children.

³³ Three of these four websites – Pom Bear, Swizzels Matlow, and Nestle Cereals – are included in the Monitoring Outcomes section. The fourth – Cadbury's – is in the Brand-Controlled Content Requiring No Additional Action section below.

³⁴ Some examples include: Oreos tweets featured promotional packaging celebrating 90 years of Mickey Mouse, but the content was not directed at children and the products may not have been available in the UK; Kellogg's retweeted a post from @UNILAD_Grub featuring a Mickey Mouse branded box of Multigrain Shapes – a non-HFSS product; Krispy Kreme shared images of adults licensed character costumes for MCM ComicCon

Nine of the 48 Facebook pages (Cheestrings, Chewits, Dairylea, Dr Pepper, Friij, Hula Hoops, Haribo, Ribena, Skittles) did not have any posts or shared content from within three months of the monitoring period, meaning these pages were essentially inactive and the non-paid-for content outside the remit of the CAP Code.

The content of the Facebook posts was generally adult-focused. Several brands shared posts featuring children but the content was not specifically directed at children.³⁵

Instagram

39 of the 50 brands had a brand-specific Instagram account of which four (Chewits, Friij, M&Ms, Pom Bear) did not have any posts from within three months of the monitoring period, meaning the accounts were essentially inactive and the historic content was not considered eligible for the monitoring project. Five of the 39 brands' English-language Instagram accounts were primarily aimed at US consumers (Dr Pepper; Maltesers; Snickers; Monster Energy; Oreos) and so all posts may not fall under the remit of the CAP Code.

The content of the Instagram posts was primarily images of products with some posts shared from other accounts showing Instagram users interacting with the products. Licensed characters were the least common on Instagram of all the media monitored. The posts including licensed characters which may be popular with children were not directed at children through their content.³⁶

YouTube

38 of the 50 brands had a brand-specific YouTube channel. The featured videos on these channels were viewed to assess the content. Videos more than three months old on a brand's YouTube channel were not assessed unless they had been specifically promoted on the channel.

Many of the brands' YouTube channels contained archived recent ad campaigns. There were no examples of prominent ad campaigns with content clearly directed at children.³⁷ Several YouTube channels included older videos containing content or licensed characters which may appeal to children.³⁸ These videos were all over three months old and not otherwise promoted on the channels and so could be considered outside the remit of the CAP Code and ineligible for the monitoring exercise.

³⁵ Burger King shared a Facebook post showing the children of a family YouTube channel; Cathedral City included posts about packages featuring licensed characters such as SpongeBob SquarePants and Paw Patrol, but these were targeted at parents rather than children.

³⁶ One Ben and Jerry's Instagram post featured a stuffed Moomin toy.

³⁷ Without access to proprietary audience data it is not possible to establish whether under-16s represented more than 25% of the audience for these YouTube channels, however, the tone and content of the videos on the channels –ad campaigns, recipes, short videos on suppliers – is unlikely to appeal to under-16s.

³⁸ Some examples include Nestle Cereals' tie-ins with *Jurassic World: Fallen Kingdom* and *Star Wars: The Last Jedi*; a Cheestrings tie-in with *The Emoji Movie*; a Pizza Hut ad from 2017 featuring characters from the children's programme *Rainbow*; a McDonald's video from 2016 showing Little Mix surprising a fan on her birthday; a Greggs video from 2016 showing children performing a taste test on their kids' range of products.

Brand-Controlled Content Requiring No Additional Action

The monitoring exercise identified no clear breaches of the CAP Code rules regarding promotion of HFSS products to children in the 50 brands' social media content. As a result no action was required involving the social media content viewed during the monitoring period.

Content from three brands' websites was passed to the ASA Investigations team for consideration (see Monitoring Outcomes section). In addition, content was identified on the following brands' websites which required further analysis. Upon analysis it was established that there was no call for additional proactive work regarding this content.

Cadbury's

The Cadbury's website (www.cadbury.co.uk) included promotion of a dedicated Cadbury World sub-site (www.cadburyworld.co.uk/en) containing information on events and attractions for children. The equity brand character Freddo appeared prominently in the Cadbury World sub-site and elsewhere in Cadbury's social media content.

During the Social Media Monitoring period the ASA was conducting an investigation into Cadbury's use of the Freddo character and in particular the e-book *Freddo and the Missing Hop*. As the outcome of the ongoing investigation would clarify the ASA's position on whether the use of the Freddo character in isolation promoted the HFSS Cadbury Freddo product, it was not considered necessary to launch additional formal action.³⁹

Ribena

At the start of the monitoring period Ribena's website (www.ribena.co.uk) contained information and resources relating to colouring books, including a *Doodle Your World* app, as part of The Colouring Café campaign from July 2016. The content was assessed and considered to be primarily aimed at the adult colouring book audience and so was not directed at children through the selection of media or context in which it appeared.

The Colouring Café content was promoted within the World of Ribena section of the website which became less prominent after the monitoring period. Currently the Ribena website contains only brief information on The Colouring Café (www.ribena.co.uk/blog/campaigns/the-colouring-caf-by-ribena/5451/) and the resources are no longer directly available. The Colouring Café did not clearly appeal to children and did not appear to form part of Ribena's current advertising campaigns and so was not considered suitable for proactive investigative work. In addition, as their range includes a number of reformulated and reduced sugar products, it is unclear whether Ribena would be considered an HFSS brand subject to the ad placement restrictions on HFSS products.

³⁹ The investigation was published on 6 March 2019 (<https://www.asa.org.uk/rulings/mondelez-uk-ltd-a18-459126.html>) and found that a poster featuring the Freddo character and online content relating the *Freddo and the Missing Hop* comic and audio book were directed at children in breach of the CAP Code.

McDonald's

McDonald's online content included promotion of an interactive e-Book *The Greedy Reindeer* which was clearly aimed at children. However, the e-Book was housed on an independent site (www.reindeerready.co.uk) with no overt McDonald's branding. The book promoted McDonald's Christmas-themed 'Reindeer Snacks' (carrot sticks) – a non-HFSS product – and contained no images of McDonald's HFSS products. The ad was not likely to be subject to the HFSS advertising restrictions as it was part of the McDonald's Happy Readers brand, linked to McDonald's Happy Meals – a non-HFSS brand – and not the larger McDonald's brand.

Monitoring Outcomes

Action from Avatar Monitoring

The Avatar monitoring did not identify any ads for HFSS products which clearly breached the CAP Code rules on appealing to children through content, or use of licensed characters or celebrities popular with under-16s.

The monitoring exercise did identify a potential issue with ads for HFSS products being served inappropriately on YouTube Channels directed at children in 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.

The CAP Compliance Team took proactive action to contact the eight brands which served the highest number of Clear or Likely HFSS Ads on Children's YouTube Channels. The brands were required to take immediate steps to ensure the ads identified would no longer appear on the highlighted channels, and asked to provide information on the mechanisms they had in place to ensure their ads were not served inappropriately.

The eight brands contacted were:

Asda

Asda served two unique ads for HFSS Christmas foods (mince pies and desserts) on a variety of children's YouTube channels, including nursery rhymes; toy and play videos featuring children; and pre-school programmes.

Kellogg's

Kellogg's served three unique ads for HFSS products in the Crunchy Nut range on a variety of children's YouTube channels, including nursery rhymes; toy and play videos featuring children; pre-school programmes; and child-focused gaming videos.

KFC

KFC served one unique Christmas-themed ad promoting the HFSS KFC brand on a variety of children's YouTube channels, including child-focused gaming videos; and toy and play videos featuring children.

KP Snacks

KP served three unique Christmas-themed ads for HFSS salted peanuts on a variety of children's YouTube channels, including toy and play videos featuring children; and nursery rhymes.

Lidl

Lidl served two unique ads promoting HFSS Christmas desserts and party foods on a variety of children's YouTube channels, including nursery rhymes; toy and play videos featuring children; and child-focused gaming videos.

Marks & Spencer

Marks & Spencer served two ads promoting HFSS Christmas and New Year food on a variety of children's YouTube channels, including nursery rhymes; toy and play videos featuring children; pre-school programmes; and child-focused gaming videos. In addition Marks & Spencer served an ad for their Dine-In range, which featured HFSS products and alcohol, on children's YouTube channels, including the channel for a pre-school programme.

McDonald's

McDonald's served one ad for the HFSS product, Big Tasty with Bacon, and another ad for the McDonald's brand in general on children's YouTube channels, including child-focused gaming videos.

Pringles

Pringles served two ads featuring their HFSS products, on a variety of children's YouTube channels, including nursery rhymes; toy and play videos featuring children; pre-school programmes; and child-focused gaming videos. One ad was based around a Christmas party; the other featured a 'Free Prize with Every Can' promotion. The content of the ad for the free prize promotion was not aimed at pre-school or primary school children, and therefore this ad was not considered likely to breach Rule 15.14 of the CAP Code.

Response from Brands

The brands did not contest the findings of the Avatar monitoring exercise but many believed that the ads had run in error as they considered they had taken all relevant steps to prevent their ads being served to YouTube users aged under 16.

Several brands, in particular supermarkets, explained it was not in their interests to serve ads for their products to children who are unlikely to directly purchase the products shown.

All eight brands took steps to ensure that their HFSS ads would no longer appear on the channels identified. The brands began working with their advertising partners to improve their targeting approach and develop safelists and blocklists to ensure that their HFSS ads would not appear alongside other inappropriate media.

Actions from Social Media Monitoring

The monitoring exercise found that the 50 brands' current social media was generally compliant with the requirements of the CAP Code regarding content appealing to under-16s. However, a small number of brands were found to have problematic content within their websites, particularly games and resources intended for use by children.

Content on three brands' websites was passed to the ASA Investigations team:

Pom Bear

The Pom Bear website (www.pom-bear.co.uk) included a Family Fun section containing games and activities which could be played online or downloaded for offline use. The site and downloadable resources included the Pom Bear mascot and images of the Pom Bear product, which is HFSS. The activities appeared to be directly targeted at children as they included instructions such as "*Make sure there is an adult present while using scissors...*".

The examples were passed to the ASA Investigations team to consider a proactive investigation into whether the content breached the CAP Code by promoting HFSS products to children. The content identified was removed from the Pom Bear website following contact from the ASA.

Nestle Cereals

The Nesquik cereal section of the Nestle Cereals website (www.nestle-cereals.com/uk/en/products-promotions/brands/nesquik-brand) included downloadable placemats intended for children. The placemats included an image of the Nesquik bunny character and contained text such as: "*Today it's _____'s birthday. So Mummy decided to make a birthday cake with some _____ and a lot of _____. She put the cake in the oven and ding!!!*". Although Nesquik cereal is a non-HFSS product, it is possible that the use of the Nesquik bunny character promotes the Nesquik range as a whole, which includes the HFSS Nesquik drinks.

The examples were passed to the ASA investigations team to consider a proactive investigation into whether the content breached the CAP Code by indirectly promoting HFSS products to children.

The ASA reviewed the content and identified that the Nesquik bunny character appeared on the placemats as part of the logo for *Nesquik A-Z*. *Nesquik A-Z* is a non-HFSS alphabet-themed cereal and the placemats were based around this theme, using lettering similar in appearance to the cereal and encouraging children to fill in the blanks on the placemats. The placemats were explicitly based around the non-HFSS *Nesquik A-Z* product and found on a section of the Nestle Cereals website dedicated to non-HFSS Nesquik cereal products. As a result the appearance of the Nesquik bunny within the logo on the placemats was not considered likely to indirectly promote HFSS products and the content was therefore not subject to the HFSS advertising restrictions.

Swizzels Mattlow

The Swizzels Mattlow website (<https://swizzels.com/>) included a number of simplistic promotions and competitions, but all appeared to be restricted to participants over the age of 16. However, the site also included seasonal content and activities, which during the course of the monitoring involved Halloween and Christmas. The Halloween content included imagery of children and a Trick or Treat Tips section which appeared to contain advice for both children and adults. The Christmas content included downloadable spot-the-difference and colouring activities which appeared to be aimed at children and included multiple prominent images of Swizzels' HFSS products.

The examples were passed to the ASA Investigations team to consider a proactive investigation into whether the content breached the CAP Code by promoting HFSS products to children. When the Swizzels Mattlow website was reviewed by the ASA the content was found to have been removed. The ASA Investigations team reviewed the current content on the website and considered that this was not likely to breach the CAP Code rules on directing HFSS advertising to children and so did not pursue further action.

Appendices

Appendix 1: List of Websites in Avatar Monitoring Media Universe

Category	Websites	
General Interest	accuweather.com	allaboutbirds.org
General Interest	answers.com	aol.co.uk
General Interest	autoexpress.co.uk	bbcgoodfood.com
General Interest	belfasttelegraph.co.uk	birminghammail.co.uk
General Interest	bristolpost.co.uk	Britannica.com
General Interest	buzzfeed.com	cheezburger.com
General Interest	citationmachine.net	cosmopolitan.com
General Interest	cracked.com	dailyfeed.co.uk
General Interest	dailymail.co.uk	dailymotion.com
General Interest	dailyrecord.co.uk	dailystar.co.uk
General Interest	dayoutwiththekids.co.uk	deliciousmagazine.co.uk
General Interest	deviantart.com	dictionary.com
General Interest	diplify.com	drugs.com
General Interest	dummies.com	easybib.com
General Interest	economist.com	elle.com
General Interest	empireonline.com	encyclopedia.com
General Interest	entertainmentdaily.co.uk	espn.co.uk
General Interest	espncricinfo.com	eurogamer.net
General Interest	eurosport.co.uk	expedia.co.uk
General Interest	expertreviews.co.uk	express.co.uk
General Interest	familiesonline.co.uk	flightaware.com

Category	Websites	
General Interest	fontsquirel.com	foodnetwork.co.uk
General Interest	gamesradar.com	genius.com
General Interest	givemesport.com	gizmodo.co.uk
General Interest	glamourmagazine.co.uk	goal.com
General Interest	goodhousekeeping.co.uk	goodtoknow.co.uk
General Interest	gumtree.com	health.com
General Interest	heart.co.uk	hellomagazine.com
General Interest	heraldscotland.com	holiday-weather.com
General Interest	horseandhound.co.uk	howstuffworks.com
General Interest	howtogeek.com	huffingtonpost.co.uk
General Interest	iflscience.com	imdb.com
General Interest	independent.co.uk	inews.co.uk
General Interest	Innerbody.com	Insidehoops.com
General Interest	kentonline.co.uk	lancashiretelegraph.co.uk
General Interest	leicestermercury.co.uk	lifehacker.com
General Interest	literarydevices.net	liverpoolecho.co.uk
General Interest	lolcounter.com	look.co.uk
General Interest	lowpriceshopper.co.uk	macworld.co.uk
General Interest	manchestereveningnews.co.uk	mashable.com
General Interest	meaww.com	menshealth.co.uk
General Interest	metoffice.gov.uk	metro.co.uk
General Interest	mirror.co.uk	mumsnet.com
General Interest	nationalrail.co.uk	netdoctor.co.uk

Category	Websites	
General Interest	newsnow.co.uk	nme.com
General Interest	ok.co.uk	Onelook.com
General Interest	pets4homes.co.uk	pinknews.co.uk
General Interest	pistonheads.com	planetradio.co.uk
General Interest	popsugar.co.uk	preloved.co.uk
General Interest	radiotimes.com	ranker.com
General Interest	reddit.com	Refdesk.com
General Interest	reverso.net	Rhymezone.com
General Interest	rottentomatoes.com	sciencedaily.com
General Interest	skysports.com	slate.com
General Interest	space.com	sporcle.com
General Interest	Sportsfeelgoodstories.com	standard.co.uk
General Interest	stylecraze.com	stylist.co.uk
General Interest	techadvisor.co.uk	ted.com
General Interest	telegraph.co.uk	tfl.gov.uk
General Interest	theanswerbank.co.uk	theboltonnews.co.uk
General Interest	thedailymash.co.uk	thedodo.com
General Interest	thenorthernecho.co.uk	thesaurus.com
General Interest	thescottishsun.co.uk	thetelegraphandargus.co.uk
General Interest	thetimes.co.uk	ticketmaster.co.uk
General Interest	timeanddate.com	timeout.com
General Interest	tmz.com	tomshardware.co.uk
General Interest	transfermarkt.co.uk	tripadvisor.co.uk

Category	Websites	
General Interest	tv.com	tvguide.co.uk
General Interest	uk.yahoo.com	urbandictionary.com
General Interest	vice.com	visitlondon.com
General Interest	vitalfootball.co.uk	walesonline.co.uk
General Interest	weather-whenever.co.uk	whatsontv.co.uk
General Interest	wikihow.com	wired.co.uk
General Interest	Wordplays.com	YouTube - Britain's Got Talent
General Interest	YouTube - Soul Pancake	YouTube - TED Ed
General Interest	YouTube - The X Factor UK	

Category	Websites	
Child	4coloring.com	algebra.com
Child	bedtime.com	cartoonito.co.uk
Child	cartoonnetwork.co.uk	coloringpagefans.com
Child	Coloringpages24.com	coloringpages4u.com
Child	coloringpaintinggames.com	cool-coloring-pages.com
Child	dressupgames.com	Emperorsnewsuit.com
Child	free.kinderwebgames.com	Freecoloring.org
Child	friendship-bracelets.net	funology.com
Child	Giraffian.com	girlsgogames.com
Child	Girlslife.com	gurl.com ⁴⁰
Child	hellokids.com	Homeworkspot.com
Child	Inklesstales.com	Keacoloringbook.com
Child	kidzworld.com	Kizclub.com
Child	mathsisfun.com	mazes.org.uk
Child	nick.co.uk	Nurie.main.jp
Child	primarygames.com	primaryresources.co.uk
Child	Seventeen.com	smart-central.com
Child	supercoloring.com	Teenidols4you.com
Child	Teenvogue.com	Theideabox.com
Child	tinypop.com	YouTube - Ethan Gamer
Child	YouTube - Brat	YouTube - Its JoJo Siwa
Child	YouTube - Ryan ToysReview	YouTube - Kids Diana Show

⁴⁰ Since the monitoring period gurl.com has merged with the website seventeen.com and no longer operates as a discrete entity. The ads captured during the monitoring exercise were served prior to this change.

Category	Websites	
Child	YouTube - AWESMR Kids	YouTube - Collins Key
Child	YouTube - FunToys Collector Disney Toys Review	YouTube - Disney Junior UK
Child	YouTube - Evan Tube HD	YouTube - iBallisticSquid
Child	YouTube - Its Okay to be Smart	YouTube - Little Baby Bum
Child	YouTube - Masha and The Bear	YouTube - Sesame Street
Child	YouTube - Seven Super Girls	YouTube - Simon's Cat
Child	YouTube - Stampy Long Head	YouTube - Chu Chu TV
Child	YouTube - Toy Pudding TV	YouTube - PBS Word World

Category	Websites	
Borderline	9gag.com	agame.com
Borderline	brainden.com	bulbagarden.net
Borderline	comicbook.com	explainthatstuff.com
Borderline	fictionpress.com	freetoplay.com
Borderline	games.co.uk	gocomics.com
Borderline	goodtricks.net	kotaku.co.uk
Borderline	metrolyrics.com	miniclip.com
Borderline	neopets.com	officialcharts.com
Borderline	Pokedream.com	Rinmarugames.com
Borderline	thecompleteuniversityguide.co.uk	thestudentroom.co.uk
Borderline	thetab.com	ucas.com
Borderline	unilad.co.uk	wildtangent.co.uk
Borderline	YouTube - Brooklyn and Bailey	YouTube - Dude Perfect
Borderline	YouTube - KSI	YouTube - Markiplier
Borderline	YouTube - Matty B Raps	YouTube - Merrell Twins
Borderline	YouTube - Niki and Gabi	YouTube - Pew Die Pie
Borderline	YouTube - Sci Show	YouTube - Amy Poehler's Smart Girls
Borderline	YouTube - The Smithsonian Channel	YouTube - The Brain Scoop
Borderline	YouTube - TDM	YouTube - Unisport
Borderline	YouTube - Zoella	

Appendix 1A: Websites visited for Retargeting Avatar

Brand	Website
888	www.888.com
32red Online Casino	www.32red.com
Beargroup Ltd	www.loveislandgames.com
Ben & Jerry's	www.benjerry.co.uk
Bet365	www.bet365.com/
Betfair	www.betfair.com/
Budweiser	https://budlightbeer.co.uk/
Burger King	www.burgerking.co.uk
Cadbury	www.cadbury.co.uk/
Camelot	www.national-lottery.co.uk
Captain Morgan's Rum	www.captainmorgan.com/en-gb/
Carlsberg	https://carlsberguk.co.uk/
Casumo Casino	www.casumo.com/en-gb/
Cheestrings	https://cheestrings.net/uk/
Chewits	https://chewits.co.uk/
Coca-Cola	www.coca-cola.co.uk
Domino's	www.dominos.co.uk
Ferrero Kinder	www.kinder.com/me/en/?promo
Foster's Lager	www.fosters.co.uk
Gala Bingo	www.galabingo.com/
Greggs	www.greggs.co.uk/

Brand	Website
Haribo	www.haribo.com/enGB/home.html
Health Lottery	www.healthlottery.co.uk/
Irn Bru	www.irn-bru.co.uk
Jackpotjoy.com	www.jackpotjoy.com
Kellogg's	www.kelloggs.co.uk/en_GB/brands/coco-pops-.html
KFC	www.kfc.co.uk/
KP Hula Hoops	www.hulahoops.com
Ladbrokes	http://ladbrokes.com/
Mars	www.mymms.co.uk/
McDonald's	www.mcdonalds.com/gb/en-gb.html
McVities	www.mcvities.co.uk/
Monster Energy	www.monsterenergy.com
Nestle Kit Kat	www.kitkat.co.uk
Oreos	www.oreo.co.uk
Paddy Power	www.paddypower.com/bet
Papa John's	www.papajohns.co.uk
Playojo Online Casino	www.playojo.com/
Pokerstars	www.pokerstars.uk/
Pom Bear	www.pom-bear.co.uk/home.html
Pringles	www.pringles.com/uk/products.html
Red Bull	www.redbull.com/gb-en/
Rowntree's	www.rowntrees.co.uk/
Sky Bet	www.skybet.com

Brand	Website
Smirnoff	www.smirnoff.com/en-gb/
Subway	www.subway.com
Swizzels Matlow	https://swizzels.com/
Tombola.co.uk	www.tombola.co.uk
Walkers	www.walkers.co.uk/
William Hill	sports.williamhill.com/bet/en-gb

Appendix 2: Social Media Monitoring Brands

Brand	Website	Twitter	Facebook	Instagram	YouTube
Ben & Jerry's	benjerry.co.uk	twitter.com/benandjerrysuk	facebook.com/benjerryuk	instagram.com/benandjerrysuk	youtube.com/user/BenandJerrysHomemade
Bendicks Knoppers	storck.co.uk/en/brands/knoppers	twitter.com/therealknoppers			
Burger King	burgerking.co.uk	twitter.com/BurgerKingUK	facebook.com/burgerkinguk	instagram.com/stories/burgerking.uk	youtube.com/user/tausteisking
Cadbury Dairy Milk	cadbury.co.uk/products/cadbury-dairy-milk-11294	twitter.com/CadburyUK	facebook.com/CadburyUK	instagram.com/cadburyuk	youtube.com/user/CadburyUK
Cathedral City Cheese	cathedralcity.co.uk	twitter.com/CathedralCity	facebook.com/CathedralCity		
Cheestrings	cheestrings.net/uk		facebook.com/cheestringsUK	instagram.com/kerryfoodsofficial	youtube.com/channel/UC4Ek0Vf9SDdtCpH3UHG_mA
Chewits	chewits.co.uk	twitter.com/Chewits	facebook.com/chewits	instagram.com/chewits	
Coca-Cola	coca-cola.co.uk	twitter.com/CocaCola_GB	facebook.com/cocacolaGB	instagram.com/cocacolaeu	youtube.com/user/cocacolacompanyuk
Dairylea	dairylea.co.uk	twitter.com/Dairylea	facebook.com/dairylea		
Domino's Pizza	dominos.co.uk	twitter.com/Dominos_UK	facebook.com/DominosPizza	instagram.com/dominos_uk	youtube.com/user/DominosUK1
Doritos	doritos.co.uk	twitter.com/doritosuk	facebook.com/doritosuk	instagram.com/doritosuk	youtube.com/user/Doritosuk
Dr Pepper	coca-cola.co.uk/drinks/dr-pepper	twitter.com/DrPepper_GB	facebook.com/drpepperuk		
Fanta	cocacola.co.uk/fanta/en/home	twitter.com/Fanta_GB	facebook.com/fantagreatbritain		youtube.com/fanta

Brand	Website	Twitter	Facebook	Instagram	YouTube
Frijj	muller.co.uk/nc/our-brands/mueller-milk-ingredients/muller-milk-and-ingredients/brands/all/filter/brand/30	twitter.com/FRijj	facebook.com/FRijj	instagram.com/frijj_uk	
Greggs	greggs.co.uk	twitter.com/greggsofficial	facebook.com/greggsofficial	instagram.com/greggs_official	youtube.com/user/GreggsFreshBaking
Haribo	haribo.com/enGB/home.html	twitter.com/officialharibo	facebook.com/HariboUK		youtube.com/user/UKHaribo
Hellmanns Mayonnaise	hellmanns.com/uk/home.html	twitter.com/HellmannsUK	facebook.com/hellmannsuk	instagram.com/hellmannsuk	youtube.com/user/HellmannsMayo
IRN-BRU	irn-bru.co.uk	twitter.com/irnbru	facebook.com/irnbru	instagram.com/irnbru	youtube.com/user/irnbru
Kellogg's Cereal	kelloggs.co.uk/en_GB/home.html	twitter.com/KelloggsUK	facebook.com/KelloggsUK&IRE	instagram.com/kelloggs.uk	youtube.com/channel/UC_lySF2so23n9CGl0SSqPrg
KFC	kfc.co.uk	twitter.com/KFC_UKI	facebook.com/KFC.uk	instagram.com/kfc	youtube.com/user/KFCRESTAURANTS
Kinder	kinder.com/uk/en	twitter.com/ferreroUK	facebook.com/kinder	instagram.com/buenoukirl	youtube.com/channel/UCerTrWkNSWsxskWbYhWY5g
KP Hula Hoops	hulahoops.com	twitter.com/hulahoopsuk	facebook.com/HulaHoopsUK		youtube.com/channel/UC5SrI_Bw7X5sRwEGTvi61wg
Krispy Kreme	krispykreme.co.uk	twitter.com/krispykremeUK	facebook.com/krispykremeUK	instagram.com/krispykremeuk	youtube.com/user/KrispykremeUK
Mars M&Ms	mymms.co.uk	twitter.com/mmsuk	facebook.com/mmsuk	instagram.com/mms_uk	youtube.com/channel/UCBPbFTz9GThomkxqr3WENvQ
Mars Maltesers	mars.com/uk/en	twitter.com/MaltesersUK	facebook.com/Maltesers	instagram.com/maltesers	youtube.com/channel/UCQGsibk3lplgFUy0D9D8Jg
Mars Skittles	skittles.co.uk	twitter.com/uk_skittles	facebook.com/UKSkittles		youtube.com/user/SkittlesbrandUK

Brand	Website	Twitter	Facebook	Instagram	YouTube
Mars Snickers	mars.com/uk/en/brands	twitter.com/snickersuk	facebook.com/snickersgetsnuts	instagram.com/snickers	youtube.com/channel/UCawSFzIEiQe7U2lv9Sp4ALw
McCoy's	mccoys.co.uk	twitter.com/McCoys	facebook.com/mccoyscrisps		
McDonald's	mcdonalds.com/gb/en-gb.html	twitter.com/McDonaldsUK	facebook.com/McDonalds	instagram.com/mcdonaldsuk	youtube.com/channel/UCRpqjPtyLWp51TRyi515RIg
McVities	mcvities.co.uk	twitter.com/mcvities	facebook.com/McVitiesOfficial	instagram.com/mcvitiesofficial	
Monster Energy	monsterenergy.com	twitter.com/MonsterEnergyUK	facebook.com/MonsterEnergy	instagram.com/monsterenergy	youtube.com/monsterenergy
Mr Kipling	mrkipling.co.uk	twitter.com/mrkiplingcake	facebook.com/mrkiplingcakes	instagram.com/mrkiplingcakes	youtube.com/channel/UC3GnC75AizIOGoRJcFKPpkA
Muller Corners	muller.co.uk	twitter.com/MullerUKandI	facebook.com/Muller/	instagram.com/mullerukandireland	youtube.com/user/Muller
Nando's	nandos.co.uk	twitter.com/nandosuk	facebook.com/Nandos.UnitedKingdom	instagram.com/nandosuk	youtube.com/channel/UCVgYYZS_7RE-Hh9dFVMo8Rw
Nestle Cereals	nestle-cereals.com/uk/en	twitter.com/NestleCerealsUK	facebook.com/NestleCerealsUK	instagram.com/nestlecerealsuk	youtube.com/channel/UCHsASr521u0FUj0gW1tq1qg
Nestle Kit Kat	kitkat.co.uk	twitter.com/KITKAT	facebook.com/kitkatuk	instagram.com/kitkat	youtube.com/user/kitkat
Oreos	oreo.co.uk	twitter.com/oreo	facebook.com/oreo	instagram.com/oreo	youtube.com/user/Oreo
Papa John's	papajohns.co.uk	twitter.com/papajohnsuk	facebook.com/papajohnsuk	instagram.com/papajohnsuk	youtube.com/user/PapaJohnsPizzaUK
Pizza Hut	pizzahut.co.uk	twitter.com/pizzahutuk	facebook.com/pizzahutuk	instagram.com/pizzahutuk	youtube.com/user/pizzahutdeliveryuk
Pom Bear	pom-bear.co.uk/home.html	twitter.com/pombearuk	facebook.com/PomBearUK	instagram.com/pombearuk	

Brand	Website	Twitter	Facebook	Instagram	YouTube
Pringles	pringles.com/uk/home.html	twitter.com/Pringles_UK	facebook.com/PringlesUK	instagram.com/pringles.uk	youtube.com/user/pringles
Red Bull	redbull.com/gb-en	twitter.com/RedBullUK	facebook.com/RedBull	instagram.com/redbulluk	youtube.com/user/redbull
Ribena	ribena.co.uk	twitter.com/ribenaUK	facebook.com/RibenaUK	instagram.com/ribenaUK	youtube.com/channel/UCwLQBdNGIBsPiAPX8XQXvgA
Rowntree's Randoms	rowntrees.co.uk	twitter.com/rowntrees	facebook.com/rowntrees		
Subway	subway.com/en-GB	twitter.com/SubwayUK	facebook.com/SubwayUK	instagram.com/subway_ukireland	youtube.com/user/SUBWAYUKIreland
Swizzels Matlow	swizzels.com	twitter.com/SwizzelsMatlow	facebook.com/SwizzelsMatlow	instagram.com/swizzels_sweets	youtube.com/channel/UCvZC0UNTF2ZBCSS5UDXpCVg
Twix	twix.co.uk	twitter.com/OfficialTwixUK			
Tyrrell's Crisps	tyrellscrisps.co.uk	tyrellscrisps.co.uk	facebook.com/TyrrellsOfficial	instagram.com/tyrellsofficial	
Walker's Crisps	walkers.co.uk	twitter.com/walkers_crisps	facebook.com/walkers	instagram.com/walkers_crisps	youtube.com/user/walkerscrisps
Walls Carte D'Or Ice Cream	wallsicecream.com/uk/our-brands/carte_d_or.html	twitter.com/walls	facebook.com/WallsUK	instagram.com/wallsicecream	youtube.com/channel/UC_XBlycV6xtpZ6UW75tU02A