



More **impact** online

Advertising Standards Authority
Committees of Advertising Practice
Annual Report 2018



ASA ✓ **CAP** ✓

Legal, decent, honest and truthful

This **online report** contains the following additional information:



Independent Reviewer's report

Sir Hayden Phillips, the Independent Reviewer of ASA Council Rulings, reports on cases he reviewed in 2018.

Advertising Advisory Committee report

The Advertising Advisory Committee (AAC) advises the Broadcast Committee of Advertising Practice (BCAP) on the consumer and citizen issues arising from key aspects of the TV and radio broadcast rules. Stephen Locke, AAC Chair, reports on the Committee's activity for 2018.

Industry Advisory Panel report

The Industry Advisory Panel (IAP) provides industry insight and guidance on non-broadcast and broadcast matters. Tim Duffy, IAP Chair, shares some of the areas on which the panel advised CAP and the ASA during 2018.

Promotional Marketing and Direct Response Panel report

The Promotional Marketing and Direct Response Panel advises CAP and the ASA on promotional and direct marketing matters. Chair Catherine Shuttleworth highlights some advice it provided during 2018.

Financial report

Find out more about how we are funded and our expenditure.

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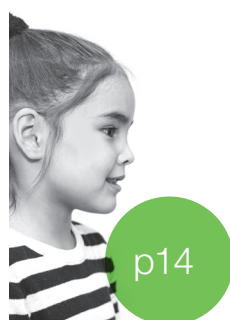
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Highlights



More impact online

Read about the evolution of our new strategy



Protecting children and vulnerable people

Learn how recent rule changes provide greater protections



Keeping up with the pace of digital change

Find out how we are making online ads more responsible



Getting a fair deal for consumers

Find out how we are tackling misleading advertising through our projects

About the **ASA** and **CAP**



ASA ✓

The Advertising Standards Authority (ASA) is the UK's independent regulator of advertising across all media

Together, we work to make ads responsible. We do this by taking action against misleading, harmful or offensive advertising and ensuring compliance across all sectors.

We believe responsible ads are good for people, society and businesses. Our ambition is to make every UK ad a responsible ad.

CAP ✓

The Committees of Advertising Practice (CAP) write the UK Advertising Codes and provide authoritative guidance on the rules



A word from **David Currie** ASA Chairman

Protecting the public online is one of the great challenges of the day.

The vast, diverse and unruly nature of the internet demands that regulators of all stripes redouble their capabilities to keep up with fast-moving content. The ASA set out our own ambition to have 'more impact online' in our five-year strategy, which we've now begun to implement.

We're building on solid foundations. We've published a collection of tough rulings against online ads for gambling and foods that are high in fat, sugar or salt (HFSS), because advertisers hadn't done enough to direct them away from children. And we started work on innovative research using child avatars to assess the level of children's exposure to age-restricted ads online.

We recognise that parents and policy-makers want reassurance on this important matter, which is why we're working proactively rather than waiting for complaints.

Research has continued to play an enlarged part in our regulation. And when we check in with people about whether they're being misled, harmed or offended by certain forms of advertising, we do so across the four nations of the UK. This year, I've been pleased to oversee the extension of our engagement work to Northern Ireland, building on the contact we've had in Scotland and Wales.

The ASA model is unique; as a form of "collective regulation" – neither statutory nor purely self-regulatory – our system relies on the active participation of a range of legal backstops, from Trading Standards and Ofcom, to the Gambling Commission and the Information Commissioner's Office. At the front-line, we use our convening power to bring together the ad industry and media owners to set, maintain and police high standards.

We welcome scrutiny of our work because we recognise that government and all its agencies share our interest in responsible advertising.

As always, advertising regulation depends on the commitment and contribution of our hard-working employees and I thank them for the work detailed in this report.



Lord Currie of Marylebone
ASA Chairman

90% of the **10,850** ads or campaigns we secured the amendment or removal of in 2018 appeared **online**, either in whole or in part



In **2018...**

The ASA resolved
33,727 complaints

98% of which were
from the public

Relating to
25,259 ads

72% of which
concerned
potentially
misleading ads

In addition
we resolved
27,014
own-initiative
compliance
cases

Resulting in
10,850
ads being amended
or withdrawn



53% more
than in 2017



A word from **James Best** CAP Chairman

A simple enough brief: 12 months of CAP and BCAP in 300 words.

That's 300 words to describe 12 months of work by the code-responsible Committees – all well-attended by representatives of our ever-wider advertising industry; by our expert advisory panels – one consumer-focused, two of practitioners in advertising, promotional marketing and direct response; by the 15 working groups convened to develop policy on the issues under consideration during the year; and by the executive teams in Regulatory Policy, Compliance and Advice & Training.

It's 300 words to sum up 12 months of discussion, research and analysis, recommendations, decisions and communication on advertising's role and responsibilities in areas of life as diverse as children's food preferences, data protection, gender stereotyping, parcel deliveries, online gambling and e-cigarettes.

In short, then, it's 300 words to express my gratitude to an impressive number and range of people from advertisers, agencies, media owners and well beyond the business in civil society, Whitehall, our co-regulators, the devolved regions, voluntary bodies and individuals, as well as to our own executives.

All have contributed over the 12 months to ensuring that the UK's advertising regulations remain world-leading in protecting citizens young and old – and especially those made vulnerable by life-stage or circumstance – while allowing responsible advertisers the opportunity to promote their products and services fairly.

This they have done at a time of widespread distraction over the country's future, of much-publicised technology-enabled challenges to established authority, and of considerable political interest in – and frequent misunderstanding of – advertising regulation, especially online.

Yes, a simple enough brief. But sadly beyond me. I shall just say 'thank you' to all who have made the 12 months under review so purposeful and productive. To get the full story, you will have to read the rest of this report.



James Best
CAP Chairman

In areas like gambling and obesity we've put the needs of children and vulnerable people first



In **2018...**

CAP delivered

535,478

pieces of advice and training to businesses

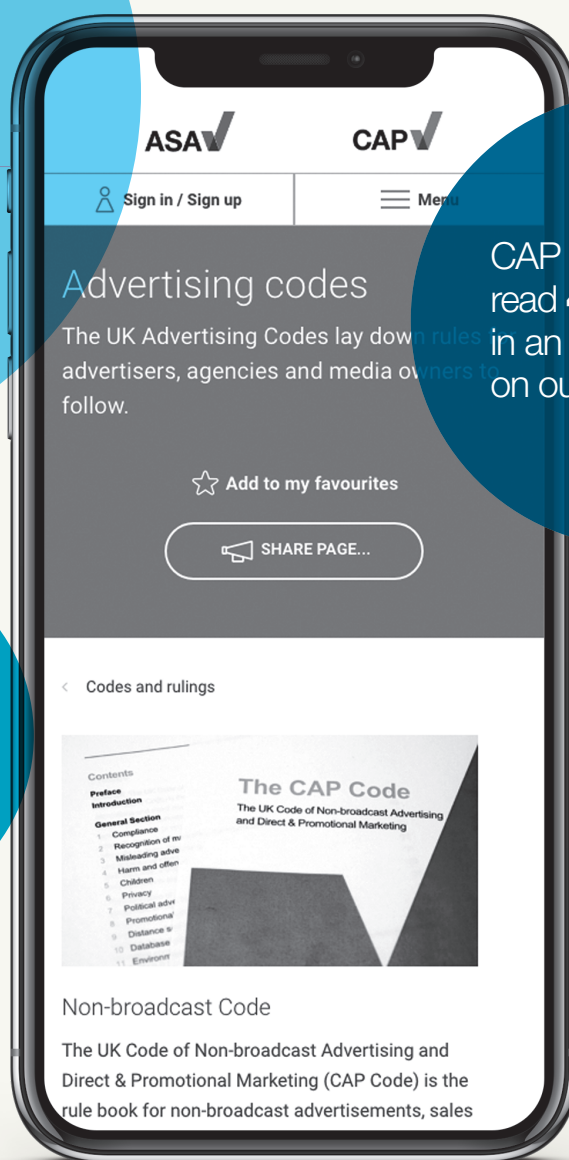


38% more than the previous year

Our Copy Advice service answered **6,258** queries from businesses

67,312 people:

- attended a workshop or industry presentation
- watched a webinar
- listened to a podcast; or
- took online training on the advertising rules



CAP guidance was read **461,908** times in an e-newsletter or on our website

Reflections from Guy Parker

From present...

What we do is important

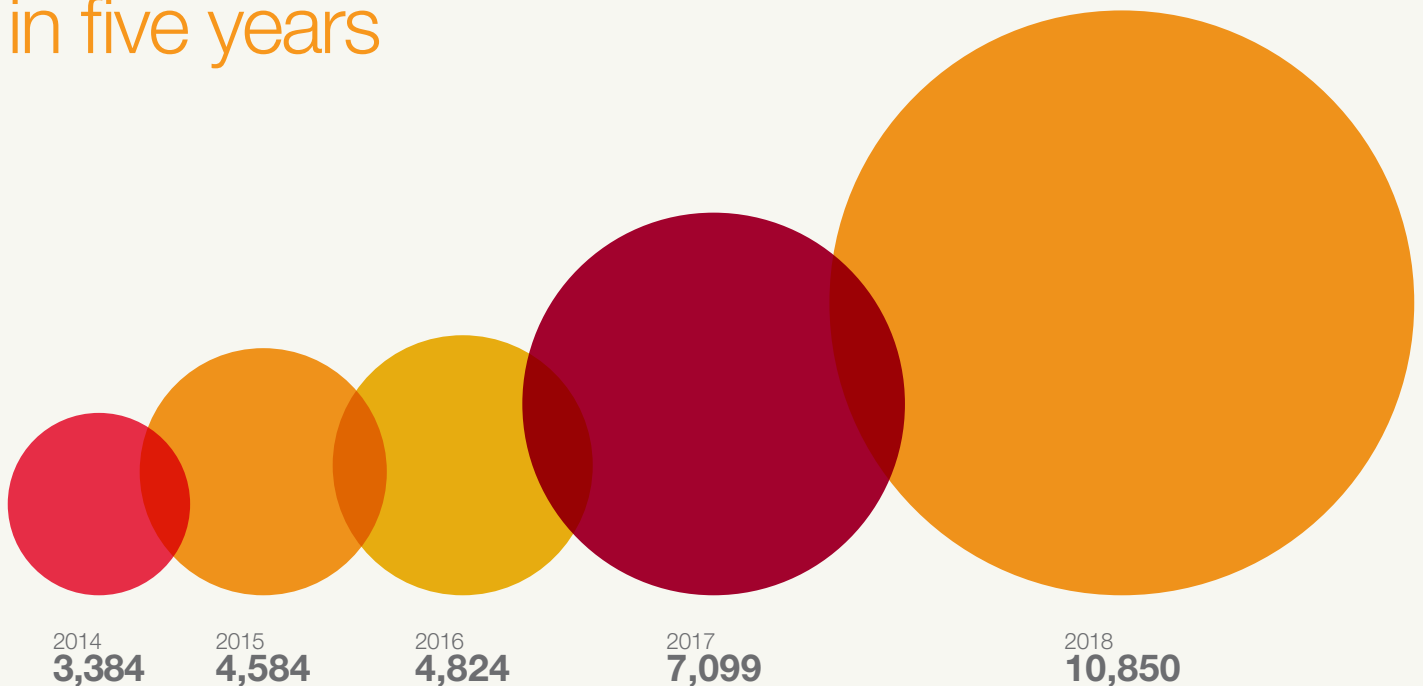
We're passionate about what we do because responsible advertisements are good for people, society and businesses

During 2018, we completed our 2014 – 2018 strategy: *Having More Impact; Being More Proactive*. We removed or had amended 10,850 ads last year, up from 3,384 in 2014. And we delivered over 535,000 pieces of advice and training to businesses, up from 194,200. More irresponsible ads removed from UK society; more help for businesses to get their ads right in the first place.

One of our top priorities is protecting children and vulnerable people from irresponsible advertising. We took tough action against influencers and ads for HFSS foods, gambling and cosmetic surgery, because they were irresponsibly targeted or harmful in their content. We protected the financially vulnerable through important projects on reference pricing, secondary tickets and parcel delivery charges, and introduced tougher standards around gambling ads.

More ads amended or withdrawn:

221% increase in five years



We're a more proactive regulator as a result of the work we've done in the last five years.

Read on to find out how we're going to have more impact regulating online advertising with our new strategy for the next five years.

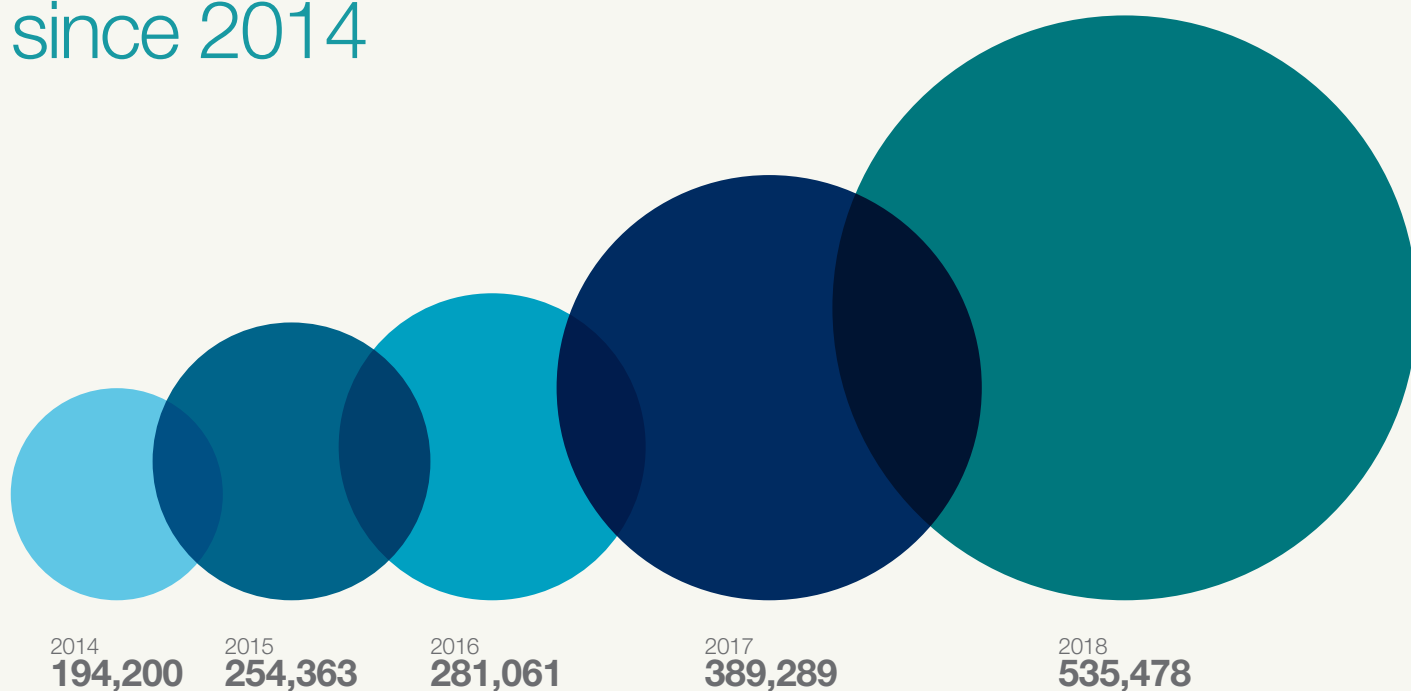
Guy Parker

ASA Chief Executive



**More pieces of
advice and training:**

176% growth
since 2014



Reflections from Guy Parker ...to future

The media landscape has **changed vividly** since 2014.

People are spending more time online, businesses are increasingly advertising online and the pace of technological change online is contributing to societal concerns. The ASA system is already regulating online advertising effectively, including companies' own claims on their websites and social media spaces. But we're not complacent: we know we need to be even more effective and that's the focus of our new 2019 – 2023 strategy: *More impact online.*

Our purpose remains the same: we're here to make ads responsible. Our ambition too: we want to make every UK ad a responsible ad.

Our new strategy is all about strengthening further our regulation of online advertising. But that doesn't mean the end of proactivity and prioritisation. It's more important than ever that we're proactive and put our resource where it's best placed to tackle the most serious mischief.

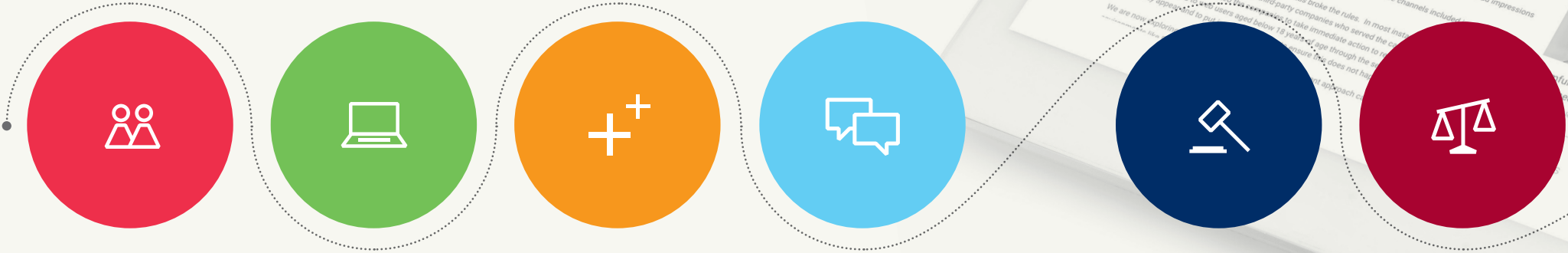
Achieving the goals outlined in our strategy depends on the commitment and goodwill of our supporters and stakeholders. This section of our report sets out the next stage in that conversation.



Guy Parker
ASA Chief Executive



The six strands of our **More impact online** strategy:



People

We will put people first, which means everyone not just people who complain to us. We'll be open to listening in new ways and we'll continue to improve our engagement with the UK nations and regions.

Online

We will improve our regulation of online advertising. We'll continue to focus on misleading content and inappropriate targeting, but we'll also be open to thinking beyond that, for example seeking to work more closely with the large online platforms so we help each other to protect people from irresponsible ads. We'll develop our thought-leadership in online ad regulation.

Effectiveness

We will deliver high-quality, proactive regulatory projects on ads that cause the most detriment to people. We'll prioritise better, explore using machine learning to improve our regulation, look to act more nimbly and simplify our regulation where we can.

Buy-in

We'll seek greater buy-in from online-only advertisers, retailers, brands, micro and SME businesses and the social influencer community, by highlighting the benefits of our regulation and being open to regulating differently.

Enforcement











We will improve how we proactively identify and remove irresponsible ads (particularly online) and our sanctioning of non-compliant advertisers.

Independence

We will continue to regulate without fear or favour, taking account of the evidence-base at all times. We'll continue to demonstrate the effectiveness of our regulation – including in response to challenges to TV and online ad regulation – through our actions and our communication, and we'll be open-minded to change that strengthens the ASA system.

Making
every UK ad
a responsible ad

Performance against our objectives

Objectives	Key activities				
 Overarching objective	We will continue implementing our strategy in pursuit of our ambition to make every UK ad a responsible ad, protect people and help them, society and business to feel more able to trust advertising	Irresponsible ads tackled and support provided to make ads responsible	Protected children through cases involving influencers and irresponsible targeting of HFSS product and gambling ads; launched call for evidence on TV ads for HFSS products; conducted research into children's exposure to age-restricted TV ads; began our avatar monitoring project exploring children's exposure to age-restricted online ads; drafted new gambling advertising guidance, <i>Protecting Children and Young People</i>	Protected the financially vulnerable by completing projects on Reference Pricing, Secondary Tickets and Delivery Charges; and made progress on swifter take-down of online scam ads	Engaged heavily with government on gambling and HFSS and, in particular, demonstrating effective regulation of online ads
 Maintaining our reactive/proactive balance	We will refine our use of research/ other intelligence and improve the effectiveness of our project work	Conducted, analysed and followed-up on our Formal Intelligence Gathering	Projects completed: Reference Pricing, Secondary Tickets, Superimposed Text in TV Ads, Children's Exposure to Age-restricted TV Ads, Content Discovery Networks and Delivery Charges	Progress underway on: Online Labelling of Ads and Children's Exposure to Age-restricted Online Ads	
 Increasing advice and training	We will implement the findings of our review of our CAP advice and training services, helping us to increase our advice and training Touchpoints to 400,000	Delivered a 37% increase in advice and training Touchpoints, including a 30% increase in online advice	Obtained CPD Certification for our Advice:am seminars and eLearning modules	Launched a programme of webinars and podcasts	
 Ensuring joined-up and consistent regulation	We will continue to increase our understanding of and collaboration with other stakeholders to provide joined-up, consistent and effective regulation	Completed our review of independent review and appeal processes in the UK and overseas and published our findings	Offered to play an informal supporting regulator role for Primary Authorities, providing free advice in support of their assured advice to clients		
 Delivering public research	We will deliver our public research commitments, including undertaking two to four pieces of research into the views of the public about ads, and continue to ensure the ASA takes into account the views of those who live in different nations and regions of the UK	Consumer research conducted on: Online Labelling of Ads, Superimposed Text in TV Ads and Children's Exposure to Age-restricted TV Ads			
 Increasing awareness	We will further reinforce efforts to build awareness of the ASA system, so people are aware of and have confidence in advertising regulation, including launching the second phase of our new public awareness campaign	Busiest year on record for media coverage: £31.1m worth of coverage (AVE) v £17.8m in 2017	Over £4m donated by media owners to the ASA ad campaign, resulting in 86% reach and a frequency rating of 18 by end Q4, exceeding targets		
 Increasing engagement	We will extend our engagement programme in the nations and regions	Delivered two engagement days with politicians, regulators and other stakeholders in Northern Ireland	Agreed refreshed Scottish engagement plan, delivered consistent presence in Holyrood and maintained higher press coverage in Scotland	Exhibited at the Welsh Assembly on the role of the ASA and CAP	Launched the new strategy at our <i>Future of Advertising Regulation</i> conference in Manchester
 Enhancing skills and capabilities	We will make sure we have the skills, capabilities and IT training to undertake our work and deliver our strategy, including improving our understanding of emerging technologies	Established a team of digital specialists	Delivered digital, GDPR and Equality, Diversity and Inclusion training to 109 staff		
 Necessary technology	We will make sure we have the necessary technology to deliver our strategy, in particular by launching our new case/contact management system	First phase of implementing our new case/contact management system went live in January. Second phase is on budget, but will be implemented in May 2019	Complied with GDPR, which included establishing our lawful bases for processing data and ensuring we had applied an appropriate consent framework		
 Refreshing our strategy	We will review and refresh our strategy, including exploring the impact of artificial intelligence on: product/ service design, development and delivery; the advertising ecosystem; and the way we regulate	Produced <i>More impact online</i> strategy after consultation, and successfully launched it on 1 November			

Key performance indicators (KPIs)

	10,850 ads amended or withdrawn	✓
	535,478 pieces of advice and training delivered	✓
	Meet customer satisfaction targets <ul style="list-style-type: none">• No Additional Investigation cases 52% – against a target of 50%• Informal cases 80% – against a target of 75%• Formal cases 71% – against a target of 75%	—
	76% for advertisers against a target of 75%	✓
	98% of Formal Investigation cases enforced – against a target of 97%	✓
	5 out of 6 case types closed within target timescales*	—
	Maintain casework productivity <ul style="list-style-type: none">• Cost per No Additional Investigation case £59.31 (10% better than 2017)• Cost per Informal Investigation case £174 (25% better than 2017)• Cost per Formal Investigation case £644 (8% worse than 2017)	—
	Maintained balance of reactive complaints casework and proactive regulatory project resourcing: 59% v 19% against a target of 55% v 20%	✓
	Exceeded our target for the number of high-priority and other projects in 2018	✓
	535,478 pieces of advice and training – against a target of 400,000	✓
	Responded to 97% of standard Copy Advice enquiries within 24 hours – against a target of 90%	✓
	90% satisfaction with Copy Advice service – against a target of 90%	✓
	Improved cost per piece of advice and training by 20% (from £1.20 to £0.96)	✓
	90% of respondents more confident of complying with the Advertising Codes after an Advice:am event – against a target of 90%	✓
	Conducted three major pieces of research	✓
	Ensured fieldwork took place in devolved nations	✓
	Prompted awareness 57% v 60% in 2017 (within margin of error)	—

Key to KPI progress:
✓ On-target — Requires action ✗ Off-target

* Jul–Dec. See our Mid-year progress report for Jan–Jun performance when different targets applied.

Keeping up with the pace of digital change



Conor Gibson
Compliance Executive,
CAP

Using avatar monitoring technology to our advantage

We regularly undertake monitoring projects which examine advertisers' websites in a specific sector to establish whether they're sticking to the Advertising Codes. However, because display ads are served dynamically and in huge numbers, it's been difficult to perform similar work with other aspects of online advertising.

That's why in November 2018 we commissioned innovative research using avatars – programmes designed to exhibit the characteristics of specific types of internet users (a child, a teenager, an adult, a child and an adult sharing a device etc.).

Over a two-week period our seven avatars made 196,000 visits to 250 popular websites and YouTube channels, capturing details of over 95,000 banner, display and video ads served to them.

As a result of this research, the ASA has already taken action to ban ads from five gambling operators which were served to child avatars on children's websites – including colouring-in and dress-up game sites.

23 different gambling ads were seen **151** times by the child avatars...

Our analysis showed that 23 gambling ads were seen by the child avatars 151 times on children's websites – 1.4% of the 10,754 ads they saw on those sites.

The five operators agreed to take immediate action to review their online ads to ensure that they were not served to web users below 18 years of age.

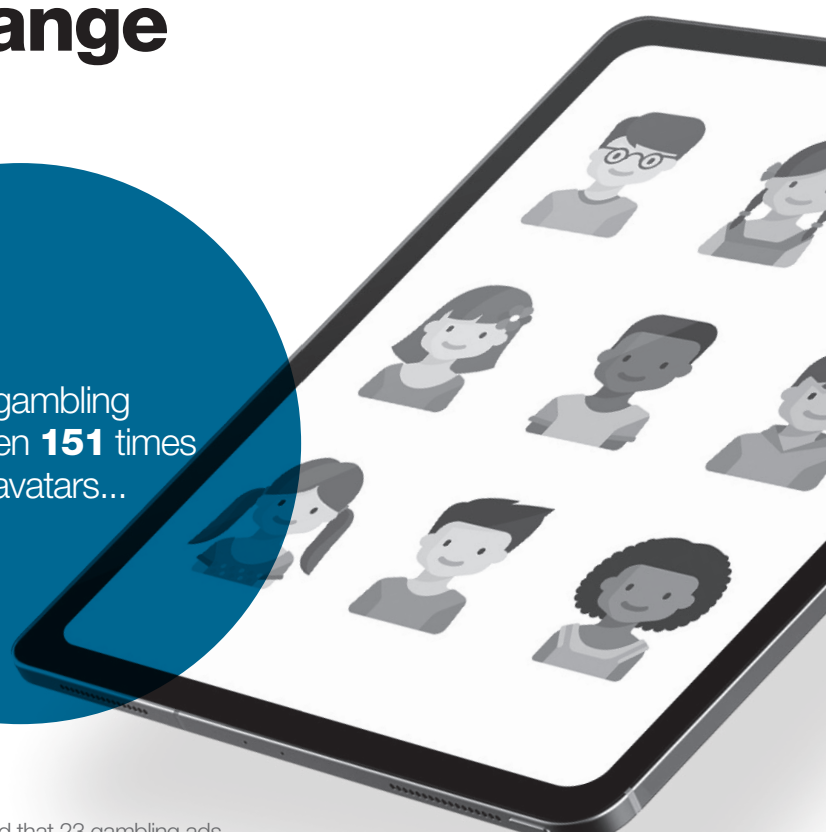
We're conducting further work on the ads served to our avatars, focusing on age-restricted ads for alcohol, and HFSS food and drinks. The avatar monitoring is our first step into using new technology to monitor online advertising and identify breaches of the Advertising Codes. As part of our new strategy, we plan to expand and develop such tools to strengthen further our regulation of online advertising.



...making up **1.4%** of the total **10,754** ad impressions they saw



This is an important new capability in monitoring the ads children are exposed to online. We're already looking at expanding our avatar work, as well as exploring how other new technologies can help us protect the public



Increasing transparency in online advertising:



Rob Morrison
Operations Manager –
Investigations,
ASA

Helping consumers to recognise ads online

Our rules require that it be obvious to people when content is intended to promote a product or brand, as opposed to being a publication's normal editorial content or an influencer's genuine independent post.

In practice, this usually means that advertisers need to include a label on their content (more on that on the right).

In 2018, we launched a project to explore what sorts of labels help people understand when posts by influencers or articles in online news sites are actually ads. This has involved a call for evidence, a literature review and the commissioning of our own research into public understanding. We'll publish the results of this work in 2019.



Emma Smith
Operations Manager –
Copy Advice,
CAP

How do
I make it
clear that
ads are ads?



Legal, decent, honest and truthful

CAP CMA

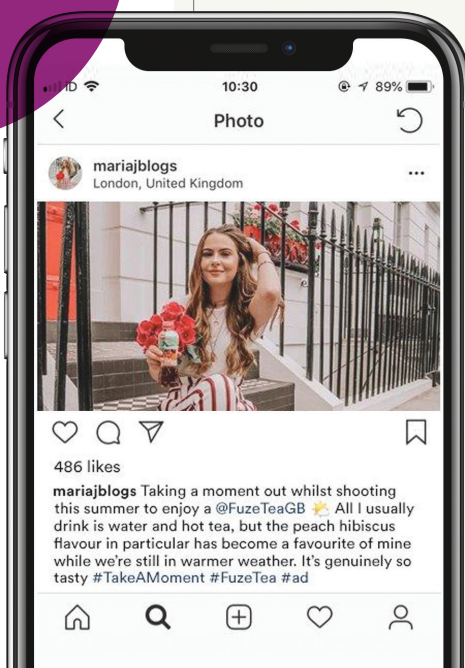
Ensuring brands and influencers know when to label their ads

In a bid to encourage influencers and brands to be more transparent in the disclosure of their ads, we published *An influencer's guide to making clear that ads are ads* in collaboration with the CMA.

This digital resource presented a summary of the rules and set out our expectations of the industry in a more accessible format. An easy-to-use flow chart helps users to work out whether a post needs to be labelled.

CAP launched the guidance on our social media channels and shared it directly with around 70 talent, PR, social media and influencer agencies, along with other interested parties. To date, it has been downloaded over 12,000 times. We'll continue to work with the industry to get their ads right, including through incorporating the findings of the ASA's online labelling research.

Our research tested posts like this one to see how social media users interpreted different labels



Protecting children and vulnerable people



Carrie Speer
Senior Investigations Executive,
ASA

New food advertising rules in action

In July 2017, we introduced new tougher rules banning ads for foods and drinks high in fat, salt or sugar (HFSS) in children's non-broadcast media. 2018 saw the first ASA investigations under these new rules.

In total, we investigated **11 cases**, ruling against five advertisers, and setting clear precedents on interpretation of the strict standards. Where we need to act to protect children, we'll enforce the rules robustly



Our rulings showed that:



Kellogg's Coco Pops Granola

Not upheld



A brand with a mainly HFSS range, like Coco Pops, can promote a non-HFSS product, like Coco Pops Granola, in children's media if it is sufficiently clear that the ad relates specifically to that non-HFSS product rather than more generally to the mainly HFSS range of products



Cadbury and Kinder

Upheld



HFSS brands mustn't create branded content for children such as websites, educational apps or activity books



McDonald's Happy Meals

Not upheld



This ad provided a test case for product ranges. We ruled that this video on demand (VOD) ad wasn't an HFSS product ad because it didn't feature any specific HFSS foods, and because the range of foods and drinks that can be bought as part of a Happy Meal is mainly non-HFSS

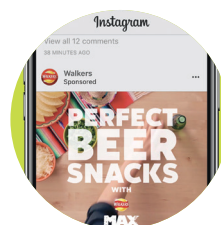


Chewits

Upheld



When posting content on social media, advertisers should use the targeting tools available to prevent the posts from being 'pushed out' to children



Walkers

Not upheld



By appropriately targeting paid-for ads using independently verified age data, or age and interest-based criteria, it's possible to advertise HFSS products on social media and other platforms responsibly



Various

Upheld



We upheld complaints against posters for HFSS products placed near schools because the audiences would be significantly skewed towards children



Andy Taylor
Regulatory Policy Executive,
CAP

Boosting gambling protections for under-18s

We published new guidance on gambling advertising in February to make it even clearer what advertisers need to do to target their ads responsibly and to protect under-18s from content likely to appeal particularly to them, including animations and child-like cartoon characters.

The new guidance on children and young people pays particular attention to the protections in the online space. Ad restrictions for gambling products (as with all products) apply equally online as well as off. CAP will continue to monitor the sector to ensure compliance.



Ella Smillie
Regulatory Policy Executive,
CAP

Preventing harmful gender stereotypes in ads

In December, we announced that ads will no longer be able to depict harmful gender stereotypes. The new rule, which is the result of a lengthy public consultation, will apply to both broadcast and non-broadcast media. CAP also published detailed guidance with scenarios to help advertisers understand what will be prohibited by the new rule, which will be enforced from 14 June 2019.

Nicola Sturgeon, First Minister of Scotland, described this as "a good example of the media using self-regulation to respond to public concern" at the National Advisory Council on Women and Girls event this year.



Cherie Leung
Regulatory Policy Executive,
CAP

What ads do children see on TV?

We published a report which set out data on children's exposure to age-restricted TV ads, namely ads for alcohol, gambling and HFSS food and soft drinks.

Ads for HFSS food and drink products aren't allowed to be targeted at children regardless of the media. This is an important area, so we keep children's exposure to these ads under continuous review.

We'll publish an exposure report annually as part of our ongoing monitoring and to help inform policy-makers.



TV audience data from 2013 to 2017 showed:

-37.3%

decrease in children's exposure to TV ads for gambling

-62.5%

decrease in children's exposure to TV ads for alcohol



-45.5%

decrease in children's exposure to TV ads for all food and soft drinks

Children's exposure to all TV ads peaked in 2013 to 229.3 ads per week, and declined, year-on-year to 161.2 ads per week in 2017

Of the

161.2

TV ads children saw, on average, in 2017

1 was for an alcohol product

2.8 were for gambling products

9.6 were for HFSS products



Getting a fair deal for consumers



Sam Falk & Wura Sanusi
Investigations Executives,
ASA

Clamping down on misleading pricing practices by secondary ticketing providers

In March 2018, the ASA ruled against GetMeIn!, Seatwave, StubHub and viagogo, four of the main operators in the secondary ticketing sector, for misleading pricing claims on their websites.

Our rules require that quoted prices include non-optional taxes and fees which apply to all or most buyers. Advertisers should also state any applicable delivery fees. In breach of these rules, people lured in by attractive initial prices presented by these operators were being hit with big fees towards the end of the customer journey.

These rulings put the sector on notice that their practices needed to change. Operators were given a deadline of 29 May to remove the misleading price claims from their websites – or otherwise face referral to National Trading Standards for legal action.

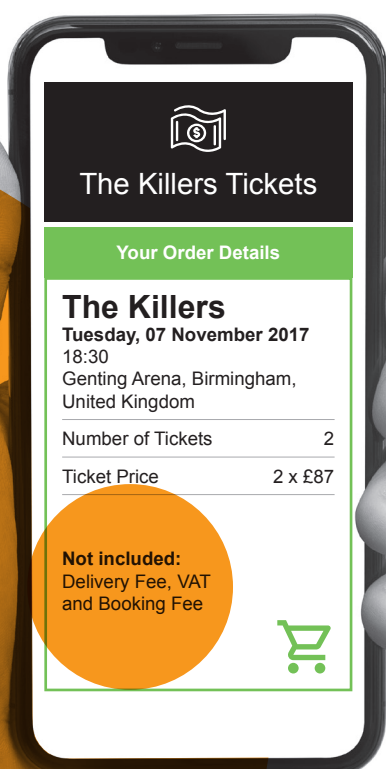
Shortly after the rulings, three of the companies changed their advertising to make it compliant.

Further enforcement action was taken against viagogo, through ASA sanctions and ultimately a referral to National Trading Standards for legal action to be taken against the company. Facing the prospect of prosecution, viagogo came into compliance with our rules by September.

The effect is that prices in this important market are now being advertised transparently.

viagogo

The ASA ruled that ads like this were misleading as additional fees, like booking fees and delivery charges, should have been made clear as soon as the ticket price was quoted. They also had to remove the “100% Guarantee” and “Official Site” claims from their site



Anthony McGarry
Senior Investigations Executive,
ASA

Interrogating consumer understanding of reference prices

We conducted research into people's understanding of reference price claims in ads to see whether consumers' expectations had changed over time.

We found that our standards are broadly in the right place, although the public's understanding of such claims is limited.

As these pricing practices have the potential to mislead if they don't reflect the assumptions people make, we used this opportunity to remind advertisers of our reference pricing guidance available.

i Retail ads often compare the current price of a product to a higher price, known as a 'reference price', which can be the price at which the product was previously sold, a price recommended by a manufacturer or a competitor's price.





Gemma Rosenblatt
Research Specialist,
ASA

Taking a closer look at the small print in TV ads

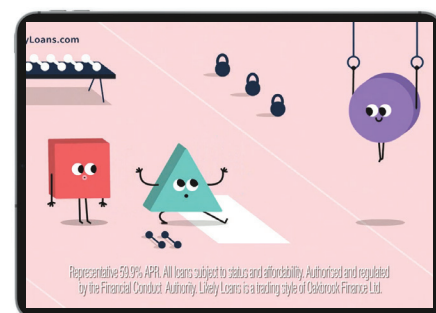
We conducted research into whether TV viewers can read and understand the superimposed text, commonly known as supers, that is laid onto many TV ads to qualify a claim.

Following a literature review, call for evidence and qualitative research with TV viewers, we identified various factors that affect the legibility and comprehension of supers.

The research showed that poor contrast between the background and text, as well as issues with text size, the spacing of letters, the amount of text and time on screen, were some of the factors that impeded viewers' ability to read qualifying supers in a TV ad.

As a result, CAP toughened the standards we require for supers, while the ASA announced it will take a stricter approach to ensure qualifications are presented clearly.

We used a range of ads in a real-life setting to test whether the supers could be read – such as the example below



Jim Tebbett
Senior Compliance Executive,
CAP

Tackling unfair delivery charges

Misleading delivery claims proved to be one of the big consumer issues of the year, particularly in Scotland and Northern Ireland. Informed by consumer research from Citizens Advice Scotland and Ofcom, and using intelligence from a range of sources, including campaigning parliamentarians, we published our *Enforcement Notice: Advertised Delivery Restrictions and Surcharges* in April 2018.

Its effect is clear: UK consumers should expect a definitive claim about "UK delivery" to apply to them wherever they live, including Northern Ireland and the highlands and islands of Scotland. If there are delivery restrictions or exclusions, these need to be clear from the outset.

Taking action

We sent 299 Enforcement Notices to retailers across the UK.

Our enforcement work resulted in
97% compliance



Delivery claims

The Enforcement Notice included guidance on the different delivery terms retailers can use to stick to the rules

'UK delivery'



'GB delivery'



'Mainland UK delivery'



Further clarification needed e.g. named postcodes



Complaints and cases in context

Resolving complaints and cases

Our action on misleading, harmful or offensive ads

There are three types of action the ASA can take as a result of an investigation.



No additional investigation

We may decide there is no problem under the Advertising Codes and take no further action. In other cases, we are unable to investigate because the complaint or the advertising material falls outside of the ASA's remit.



Informal investigation

Where appropriate, the ASA will resolve issues informally. For example, where a minor or clear-cut breach of the Advertising Codes has been made, we may issue advice on how to comply with the Codes or seek assurance that an advertiser will change or withdraw their ad immediately.



Formal investigation

If the ad raises concerns under the Advertising Codes, we can conduct a thorough investigation in which all sides are given the opportunity to comment. Advertisers will be asked to provide their arguments and evidence to support their advertising claims and approach. Final rulings are made by the ASA Council, with complaints either upheld or not upheld. They are published in full on our website each week.

Complaints and cases resolved

30%

more cases were resolved than in 2017

Complaints resolved also increased **24%** in 2018



	Non-broadcast		Broadcast		Overall totals*	
	Complaints	Cases	Complaints	Cases	Complaints	Cases
Total not investigated	15,973	13,954	10,332	6,097	26,035	19,814
Total investigated	6,357	5,168	1,416	345	7,692	5,445
Informal investigation	5,068	4,622	352	204	5,387	4,796
Of which:						
– Action taken	4,844	4,426	292	170	5,109	4,571
– No action taken	224	196	60	34	278	225
Formal investigation	1,289	546	1,064	141	2,305	649
Of which:						
– Upheld/Upheld in part	974	341	253	66	1,202	387
– Not upheld	170	88	625	64	774	136
Withdrawn cases	145	117	186	11	329	126
Total complaints and cases resolved	22,330	19,122	11,748	6,442	33,727	25,259

* Both non-broadcast and broadcast figures include multimedia figures which appear only once in the "overall totals" column.

Ads amended or withdrawn

10,850

ads were amended
or withdrawn in 2018

A **53%**
increase
on 2017



Turnaround performance**

5 of 6
turnaround KPIs
were met

Turnaround performance Non-broadcast cases



Turnaround performance Broadcast cases



* Dependent on case type.

** These figures show our turnaround performance for the second half of 2018 as we updated our reporting midway through the year. To see turnaround performance figures for January – June 2018, please refer to our 2018 Mid-year progress report.

Complaints and cases in context

Trends

Complaints and cases resolved by media

+41%
increase
in online
complaints

Online cases
outnumbered
television cases
by almost **3:1**

+23%
increase in
television
cases

Media	2018				2017	
	Complaints		Cases		Complaints	Cases
	Number	% +/-	Number	% +/-	Number	Number
Online	16,059	41%	14,257	38%	11,361	10,310
Television	10,773	14%	5,748	23%	9,466	4,666
Email	1,224	27%	1,187	28%	964	924
Outdoor	1,346	66%	828	45%	810	571
Radio	1,028	20%	741	22%	854	609
Point of sale	859	62%	689	40%	529	493
National press	669	-6%	529	-3%	708	543
Leaflet	525	20%	466	18%	439	394
Other	408	71%	355	86%	239	191
Direct mail	387	16%	352	12%	333	315
Packaging	336	15%	330	16%	291	285
Brochure	311	4%	285	1%	299	281
Regional press	508	68%	284	10%	303	258
Magazine	310	9%	264	1%	285	262
Press general	215	109%	168	115%	103	78
Transport	228	-7%	143	-8%	245	155
Text message	116	18%	115	19%	98	97
Cinema	169	20%	99	16%	141	85
Catalogue	79	30%	79	32%	61	60
Circular	72	-16%	62	-15%	86	73
Mailing	59	-12%	53	-12%	67	60
Insert	40	-17%	35	-5%	48	37
Directory	19	6%	18	0%	18	18
Ambient	18	29%	17	31%	14	13
Fax	1	-50%	1	-50%	2	2
Voicemail	1	100%	1	100%	0	0

Online complaints and cases by online media

'Online advertiser-owned'

refers to online spaces within a company's or organisation's own control where they make advertising claims – such as websites or social media pages

78%
of online cases
were in online
advertiser-owned
spaces

22%
were in other
online media

	2018				2017	
	Complaints		Cases		Complaints	Cases
	Number	% +/-	Number	% +/-	Number	Number
Online media						
Online advertiser-owned	12,455	38%	11,073	35%	9,026	8,199
Internet (on own site)	9,465	35%	8,465	34%	7,004	6,328
Internet (social networking)	2,103	69%	1,779	58%	1,242	1,125
Internet (OM 3rd party)	451	7%	424	5%	422	403
In-game advertising	341	61%	314	55%	212	202
Internet (e-tailing)	91	-37%	87	-38%	145	140
Internet (social games)	4	300%	4	300%	1	1
Other online media total	3,604	54%	3,184	51%	2,335	2,111
Internet (display)	1,107	110%	998	105%	528	487
Internet (sales promotion)	984	11%	920	8%	889	848
Internet (search engine)	443	23%	405	35%	359	301
Video on demand (VOD)	397	129%	270	131%	173	117
Internet (online behavioural advertising)	253	126%	233	120%	112	106
Internet (video)	229	73%	175	54%	132	114
Internet (price comparison)	120	122%	114	111%	54	54
Internet (classified)	54	23%	52	18%	44	44
Mobile	17	-61%	17	-58%	44	40
Internet (viral)	0	0%	0	0%	0	0

Complaints and cases in context

Trends

Complaints and cases resolved by sector

+24%
increase in
leisure cases

+40%
increase in retail
complaints

+20%
increase in
holidays and
travel cases

+31%
increase in
health and beauty
complaints



Sector	2018				2017	
	Complaints		Cases		Complaints	Cases
	Number	% +/-	Number	% +/-	Number	Number
Retail	5,817	40%	4,409	29%	4,165	3,431
Leisure	5,083	16%	4,116	24%	4,371	3,327
Health and beauty	3,914	31%	2,670	44%	2,993	1,858
Business	2,892	36%	2,346	34%	2,131	1,746
Holidays and travel	2,091	8%	1,936	20%	1,934	1,614
Financial	2,264	-3%	1,728	29%	2,340	1,339
Food and drink	2,500	11%	1,678	34%	2,257	1,254
Computers and telecommunications	1,908	16%	1,352	21%	1,642	1,114
Non-commercial	2,251	36%	1,181	31%	1,651	899
Household	1,121	53%	860	80%	735	478
Property	975	28%	694	14%	762	610
Motoring	908	36%	534	24%	669	431
Publishing	374	-3%	341	-1%	387	346
Utilities	406	69%	333	57%	240	212
Unknown	305	37%	299	35%	222	221
Education	226	35%	220	37%	167	161
Alcohol	231	44%	196	44%	160	136
Clothing	201	57%	148	139%	128	62
Employment	167	36%	135	26%	123	107
Industrial and engineering	45	45%	44	91%	31	23
Tobacco	25	19%	21	0%	21	21
Agricultural	21	133%	16	100%	9	8
Electrical appliances	2	200%	2	200%	0	0

* Includes complaints about advertising in general.

Complaints and cases resolved by issue

Over **3/4** of Non-broadcast complaints concerned potentially misleading ads, compared with just over **1/3** of Broadcast complaints

	2018				2017			
	Non-broadcast		Broadcast		Non-broadcast		Broadcast	
	Complaints	Cases	Complaints	Cases	Complaints	Cases	Complaints	Cases
Misleading	17,849 (77%)	15,977 (82%)	4,393 (36%)	2,837 (42%)	13,135 (78%)	12,167 (83%)	3,840 (33%)	2,499 (46%)
Offensive	2,542 (11%)	1,423 (7%)	4,735 (38%)	2,165 (32%)	2,130 (13%)	1,250 (8%)	5,814 (51%)	1,931 (36%)
Harm	1,537 (7%)	1,110 (6%)	2,464 (20%)	1,247 (18%)	852 (5%)	606 (4%)	1,424 (12%)	696 (13%)
No issue	1,150 (5%)	1,083 (6%)	720 (6%)	496 (7%)	723 (4%)	689 (5%)	412 (4%)	294 (5%)

N.B. Numbers in brackets represent percentage totals of complaints and cases by issue.

ASA Council

The ASA Council is the independent jury that decides whether an ad has broken the Advertising Codes.

Collectively, members offer a wide range of skills and experience from different perspectives. Two-thirds of the Council on each panel are independent of the advertising and media industries and the remaining members have a professional background in the advertising or media sectors.

The Council also operates as the Board of the ASA.

In 2018, we sadly said goodbye to Roisin Donnelly, Rachel Childs and Alan Bookbinder, who came to the end of their terms of service. We were delighted to welcome Nita Patel, Aaqil Ahmed and Zaid Al-Qassab.



In 2018, the Council reviewed cases in **62** online or face-to-face sessions

Resulting in **500** formal rulings

Of which **60%** were upheld or upheld in part

Chairman

Lord Currie of Marylebone

Chairman of the ASA;
former founding Chairman of Ofcom



Independent members

Aaqil Ahmed

Media Consultant, Aaqil Ahmed
Media Consultancy; former Head
of Religion and Ethics at BBC
and Channel 4



B N

Kate Bee

Freelance journalist;
Director, The Sober School



B N

Advertising industry members

Zaid Al-Qassab

Chief Brand & Marketing Officer,
BT Group



B N

Reg Bailey

Member, BBFC Advisory Panel
on Children's Viewing, Advertising
Association's Media Smart
Expert Panel



B N

Wesley Henderson

Past Director, Consumer Council for
Northern Ireland; Education Team
Leader Northern Ireland for Cats
Protection



B N

Suzanne McCarthy

Chairs, Depaul UK, Fire Standards
Board, Joint Audit Panel MOPAC
and MPS; Vice Chair, Valuation
Tribunal Service



B N

Tracey Follows

Founder of futures consultancy,
Futuremade; former CSO of
J Walter Thompson and APG Chair



B N

David Hepworth

Writer and broadcaster;
Director, Mixmag Media Ltd



N

Nita Patel

Director, CAYA;
Director, Planet Communications



B N

Shireen Peermohamed

Partner, Harbottle & Lewis LLP;
Video Standards Council, Member of
Appeals Panel



B N

Tess Alps

Chair of Thinkbox; former first
Chief Executive of Thinkbox



B

Neil Stevenson

Chief Executive of the Scottish Legal
Complaints Commission



B N

Sam Younger*

Chair, Voluntary Service Overseas;
Chair, CILEx Regulation



B N

Key

B Broadcast Council

N Non-broadcast Council

* The Senior Independent member
sits in place of the Chairman when
the Chairman is unable to attend the
meeting or has a declared interest
in the case being discussed.

What type of **regulator** are we?

With the Online Harms White Paper sounding the death knell for tech company “self-regulation”, we want to clarify what type of regulator we are.

Established and funded by the ad industry 57 years ago and with industry ensuring that the Advertising Codes reflect the law (and adding restrictions where there is no law), we undoubtedly have some “self-” in our regulatory system. And we value that because of the industry expertise and buy-in it brings with it.

But the ASA is independent. Our decision-making is separate from industry and government. Our funding is arm’s-length, so we’re not swayed by it. We’re recognised by the government, the courts (we’re subject to judicial review) and other regulators as being the established means of protecting people from irresponsible advertising.

Perhaps the best description is that we’re an example of successful collective regulation.

We co-regulate broadcast and video-on-demand ads with statutory regulator Ofcom and we work with numerous other bodies including Trading Standards, the Competition and Markets Authority, the Gambling Commission, the Financial Conduct Authority, the Convention of Scottish Local Authorities, Northern Ireland’s Department for the Economy, the Department for Health and Social Care, the Department for Environment, Food & Rural Affairs, the Food Standards Agency, Medicines and Healthcare products Regulatory Agency, the Information Commissioner’s Office, Citizens Advice and Citizens Advice Scotland.

Through collective regulation, we’re able to secure compliance in almost 100% of cases where we identify a breach of the Advertising Codes, including online. Between 2014 and 2018, we resolved around 72,000 complaint cases and 64,000 own-initiative cases involving allegedly misleading advertising. Of those,

around 30,000 resulted in us taking follow-up compliance action of some sort, including threatening referral to our appropriate legal backstop. That compliance action was overwhelmingly successful, resulting in us referring only 68 companies, all to Trading Standards, in those five years.

We recognise some people are suspicious about self-regulation, so to them we offer this reassurance: the ASA’s regulation is independent, effective and collective in approach, working closely with statutory agencies to protect people and responsible businesses from irresponsible ads wherever they appear, including online.

2014 – 2018:

72,000 complaints and **64,000** other cases of misleading ads resolved...

...leading to **30,000** follow-up compliance cases...

...resulting in only **68** referrals to legal backstops



Committees of Advertising Practice

Chaired by James Best, CAP and BCAP are responsible for writing and updating the UK Advertising Codes.

Committed to upholding the highest standards in non-broadcast and broadcast advertising, the Committees are made up of representatives of advertisers, agencies, media owners and other industry groups.

Committee of Advertising Practice (CAP)

Advertising Association
Cinema Advertising Association
Direct Marketing Association
Direct Selling Association
Incorporated Society of British Advertisers
Institute of Practitioners in Advertising
Institute of Promotional Marketing
Internet Advertising Bureau
Mobile UK
News Media Association
Outsmart Out of Home
Professional Publishers Association
Proprietary Association of Great Britain
Royal Mail
Scottish Newspaper Society
Television on Demand Industry Forum
Clearcast*
Radiocentre*

Broadcast Committee of Advertising Practice (BCAP)

Advertising Association
BT
Channel 4 Television Corporation
Channel 5 Broadcasting Ltd
Commercial Broadcasters Association (COBA)
Direct Marketing Association
Electronic Retailing Association UK
Incorporated Society of British Advertisers
Institute of Practitioners in Advertising
ITV plc
Sky UK Ltd
STV
Clearcast*
Radiocentre*
S4C*

* Clearcast, Radiocentre and S4C have observer status.

Independent Reviewer's report

An independent review of the rulings of the ASA Council enables consumers and advertisers to question whether those decisions are fair and reasonable.

As the Independent Reviewer, I deal with a very small proportion of cases considered by the ASA Council. In 2018, 500 rulings were published and, of the review requests I received, I recommended corrective action in only 14 cases. However, this represents 32% of all review requests and I think that suggests that the review process is not simply a rubber-stamping exercise. It is not only independent, but also has real and good consequences for advertisers and consumers.

I report on two cases from 2018, which I believe illustrate this.

The first was a TV ad for Kellogg's Coco Pops Granola, which the Council decided was too much like the original HFSS branding to make it a non-HFSS ad. This was an important issue which matters to consumers. There seemed to me two problems with the decision. First, the Council was not informed that Ofcom had accepted that two somewhat similar programme credits for the same product were not in breach of their rules. It therefore had to be seen again by the Council to correct that procedural flaw. Second, it seemed to me that the ad was predominantly about the non-HFSS Granola product and that a better conclusion would be to pass the ad, although I could not say that the original decision was indefensible. The Council decided to reverse their original decision.

The second was a direct mail ad from a pension services company about the risks of non-compliance with workplace pension requirements. The Council had concluded that the ad, quite fiercely worded, caused unjustified fear and distress. I thought there were three difficulties with this. First, the warnings in the mail were in line with those given by the Pensions Regulator itself. Second, most of the ad was not about dire warnings but about offers of help. Third, it seemed to me that, as the ad was a business to business communication, the recipients should be aware of their obligations and should not suffer fear or distress at being reminded of them. The Council reversed its decision.

Sir Hayden Phillips, GCB DL

Independent Reviewer of
ASA Adjudications



Review Cases 2017 – 2018

	Non-broadcast		Broadcast	
	2018	2017	2018	2017
Non-broadcast				
Total cases received of which:	45	43	11	11
Ineligible/withdrawn	8	19	1	0
In progress	0	0	0	0
Not referred to Council	26	15	7	8
Referred to Council of which:	11	9	3	3
Unchanged	0	0	0	0
Decision reversed	1	1	1	1
Wording changed	4	4	1	1
Re-opened investigation	6	4	1	1
In progress	0	0	0	0

Advertising Advisory Committee report

The Advertising Advisory Committee (AAC) advises the Broadcast Committee of Advertising Practice (BCAP) on the consumer and citizen issues arising from key aspects of the TV and radio broadcasting rules.

The six committee members, appointed by open competition, and Chair of BCAP, James Best, who attends as an observer, held six meetings in 2018. Much of our agenda is taken up with advising on key policy issues being considered by BCAP.

One milestone was the completion of a major project on gender stereotyping. This was based on substantial research into detriments from harmful gender-based depictions, and into relevant rules in other countries. We strongly supported the new rule and supporting guidance, and we were heartened by the strong consensus that the co-regulatory system has created.

The AAC has also taken a close interest in gambling advertising, and particularly its impact on problem gamblers and on children. This is an area that has faced strong (in our view justified) public scrutiny, and we advised on two separate pieces of guidance during the year.

A further area where the AAC has had significant ongoing concerns is superimposed text in TV ads, which is often hard to read and absorb, even though it may be critical to the viewer's understanding of what's on offer. We were pleased that, following our advice, a comprehensive review led to significant revisions of the detailed guidance in this area.

One suggestion made by the AAC and successfully followed up was the communication from CAP and BCAP on how to protect consumers in vulnerable situations, pulling together a range of Code and Guidance provisions. We had similar concerns about the slippery concept of 'normalisation' in relation to advertising regulation. Normalising good behaviour (such as exercise and healthy eating) is clearly positive, but normalising detrimental behaviour (such as dangerous driving and encouraging cigarette smoking) poses significant risks, even if it is only done incidentally. A CAP/BCAP document was published that helpfully clarifies the issues.

At the end of 2018, we welcomed Rachel Childs as a new member of the Committee, and said farewell to Claire Whyte, after seven years of distinguished service.

Stephen Locke

Chair, Advertising Advisory Committee



Members

James Best (Observer)

Rachel Childs

Robin Foster

Mike O'Connor

Adair Richards

Ruth Sawtell

Nabila Zulfiqar

Our panels

The advertising industry is central to the success of the self-regulatory system; as part of that, CAP and the ASA receive valuable support from three industry panels – the **Industry Advisory Panel, the Promotional Marketing and Direct Response Panel and the Online Publications Media Panel.**

The panels bring together advertisers, creatives, media planners and publishers who volunteer their time to give advice on marketing communications. The panels also provide a forum for the exchange of information and ideas between the industry, the ASA and CAP.

Industry Advisory Panel report

In 2018, the Panel provided expert advice across a range of topics, including complex pricing matters, delivery-time claims and the use of interest-based targeting for age-restricted products. Members also offered their valuable insight in some of the first cases to be considered under the newly introduced HFSS rules and guidance, and continued to provide their views on a large number of online, and offline, remit considerations. We welcomed some new members to ensure a continually diverse range of opinions, and to benefit from knowledge across different industry sectors and experience. As always, I would like to thank all Panel members, past and present, who volunteer their time and wisdom for the benefit of the self-regulatory system.

The Panel continued to provide a crucial industry perspective to a wide range of cases in 2018, including expert knowledge across the breadth of marketing techniques. By offering expertise on borderline cases, members play a valuable part in the ASA's ambition to make every UK ad a responsible ad.

Tim Duffy

Chairman



Members

Tim Duffy (Chairman)

Jonathan Allan

Sara Bennison

Lillian Betty

Jenny Biggam

Alexia Clifford

Ed Couchman

Shahriar Coupal (Secretary)

Matthew Dearden

Tim Evans

Peter Gatward

Steve Goodman

David Hepworth

Chris McLeod

Emma Smith (Assistant Secretary)

Charlie Snow

Michael Todd

Stephen Vowles

Mark Wallace

David Lloyd

Tanya Joseph

Promotional Marketing and Direct Response Panel report

The Promotional Marketing and Direct Response Panel (PMDRP) advises the ASA and CAP on promotional marketing and direct marketing matters.

In 2018, the PMDRP continued to provide an industry perspective and expert advice in the dynamic and innovative promotional marketing sector. The Panel provided insights into traditional promotional mechanics with discussions around availability of promotional items and “free gifts”, as well as helping to ensure that the ASA and CAP were kept informed about newer and developing practices such as “home raffles” and “live quiz” mobile apps.

“Last year the PMDRP tapped into the knowledge and expertise of senior promotional marketing experts in issues ranging from quiz apps to prosecco availability. Practical insights from marketing professionals are an essential tool to help make sure the ASA and CAP’s decision-making processes remain up to date and informed.”

Online Publications Media Panel report

The Online Publications Media Panel was established at the instigation of the Advertising Association Council, and with the endorsement of CAP, to advise CAP and the ASA on the proper distinction between editorial and advertising in online publications, in the event of any confusion.

The Panel has not been required to meet in 2018.

Catherine Shuttleworth

Chair, Promotional Marketing and Direct Response Panel



Members

Peter Batchelor
Mark Challinor
Paul Cope
Shahriar Coupal (Secretary)
Mark Dugdale
Michael Halstead
Nick Hudson (Assistant Secretary)
Wesley Henderson
Chris McCash
Catherine Shuttleworth (Chair)
Carey Trevill
James Wilkinson-Green

Members

Chairman, Advertising Standards Board of Finance
Chairman, The Regulatory Funding Group

Financial report

We are funded by advertisers through arm's-length levy arrangements that guarantee the ASA's independence. Collected by the Advertising Standards Board of Finance (Asbof) and the Broadcast Advertising Standards Board of Finance (Basbof), the 0.1% levy on the cost of buying advertising space and the 0.2% levy of the Royal Mail's Mailsort and Advertising Mail contracts ensures that the ASA is adequately funded without revealing to us which companies are contributing. We also receive a small income from charging for some seminars, the sale of eLearning materials and from the European

Interactive Digital Advertising Alliance for regulating online behavioural advertising.

Year to 31 December 2018

Audited income and expenditure figures for the combined non-broadcast and broadcast activity in 2018 (see table) are the total of the amounts recorded in the Audited Report and Financial Statements of our two operating companies, namely The Advertising Standards Authority Limited (ASA), and The Advertising Standards Authority (Broadcast) Limited (ASA(B)). These were adopted by the Non-broadcast and Broadcast Councils

at their respective Annual General Meetings held on 26 April 2019.

Income for the year

Compared with 2017, total income received from Asbof and Basbof increased by £298,000 (3%) to £9,200,000. Other income decreased by £14,000 (10%) to £113,000. Interest received increased by £6,000 (104%) to £11,000.

Expenditure for the year

Compared with 2017, total expenditure increased by £299,000 (3%) to £9,281,000. This total expenditure was less than the original budget for the year by £332,000 or 4%.

Profit for the year

The combined profit before tax of both non-broadcast and broadcast activity was £43,000. After tax, the combined profit was £36,000.

The Audited Report and Financial Statements for ASA and ASA(B) reflect a split of costs, determined by Asbof/Basbof, to reflect the workload between non-broadcast and broadcast activities, of 65% and 35% respectively, and applying them to the non-specific costs – overheads, general office costs and the like. Specifically identifiable costs were allocated in full to the relevant function.

Non-broadcast and Broadcast combined for the year ended 31 December 2018

	2018 £'000	2017 £'000
Income		
Funding received from:		
The Advertising Standards Board of Finance Ltd (Asbof)	5,895	5,675
The Broadcast Advertising Standards Board of Finance Ltd (Basbof)	3,305	3,227
Total income	9,200	8,902
Expenditure		
Salaries and direct staff costs	6,087	5,831
Office accommodation and general costs	1,556	1,509
Communications costs	502	597
Legal and professional fees	476	397
Information technology costs	435	370
Website development costs	–	55
Depreciation	143	134
Travel, subsistence and entertaining	82	89
Total expenditure	9,281	8,982
Operating loss	(81)	(80)
Interest receivable	11	5
Other income (i.e. seminars, advice and eLearning)	113	127
Profit on ordinary activities before tax	43	52



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