

Children and age-restricted ads online

Advertising Guidance
(non-broadcast)

Legal, decent, honest and truthful



Foreword

The Committee of Advertising Practice (CAP) offers guidance on the interpretation of the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (the CAP Code) in relation to non-broadcast marketing communications.

The Broadcast Committee of Advertising Practice (BCAP) offers guidance on the interpretation of the UK Code of Broadcast Advertising (the BCAP Code) in relation to broadcast marketing communications.

Advertising Guidance is intended to guide advertisers, agencies and media owners about how to interpret the Codes but is not a substitute for those Codes. Advertising Guidance reflects CAP's and/or BCAP's intended effect of the Codes but neither constitutes new rules nor binds the ASA Councils in the event of a complaint about an advertisement that follows it.

For pre-publication advice on specific non-broadcast advertisements, consult the CAP Copy Advice team by telephone on 020 7492 2100, by fax on 020 7404 3404 or you can log a written enquiry via our [online request form](#).

For advice on specific radio advertisements, consult [Radiocentre](#) and for TV advertisements, [Clearcast](#).

For the full list of Advertising Guidance, please [visit our website](#).

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Background

Children using digital media, including social media, is now commonplace in the UK. Almost 9 in 10 children aged 5-15 go online and, of these, a large proportion has a social media profile.¹

The popularity of digital media, including social media, with children and adults alike and the specificity of the data that is available from their use, make them an obvious media channel for marketers looking to reach particular audiences. This includes marketers of ads that, under the CAP Code, attract a media placement restriction; henceforth referred to as 'age-restricted ads'. Such ads must not be placed in media directed at children or in media where children make up a significant proportion of the audience. Ads may be age-restricted because of the nature of the product being advertised e.g. ads for alcohol and gambling (age 18 and over) or ads for foods high in fat, salt or sugar (age 16 or over – new rules, effective 1 July 2017).

This guidance is intended to support marketers in demonstrating that they have taken reasonable steps to target age-restricted ads appropriately so as to minimise children's exposure to such ads online, including on social media.

While this guidance is focused on ads which are age-restricted because of the nature of the advertised product, the principles are likely to be of use to any marketer wishing to restrict the reach of their ad because its content is not suitable for particular age groups.

Advertising data

Marketers can use sophisticated tools provided by digital media companies, i.e. online publishers, advertising technology companies and social media platforms, when defining their target audience for a digital campaign. The data that underpins the delivery of these campaigns can come from a variety of sources. In some cases, it is actively provided by users, e.g. in social media or other 'logged in' environments. In others, it is inferred from certain user behaviours or based on information collected from a user's device. Sometimes it is a combination of all of these. This wealth of data allows advertisers to serve an ad that, for example, is only targeted at a group of individuals falling within a specific age range, residing in a set location and having specific interests. Audiences might also be excluded from a campaign using specified criteria in the same way.

Marketers should use age data to inform their choice of online media or of specific audiences within a particular medium. Whilst age targeting provides a robust tool to

¹ [Children and parents: media use and attitudes report, Ofcom](#), November 2016

reach a specific audience, marketers can take reasonable steps to further lessen the likelihood of children being inadvertently exposed to age-inappropriate ads.

Despite the many steps digital media companies put in place to ensure the integrity of their data, it is inevitable that some incorrect information may be submitted or inaccurately inferred, e.g. by younger users misreporting their age or different people sharing the same device. Selecting or deselecting interest-based factors, such as what users are interested in, share on social media or the accounts with which they interact, can – in combination with age-targeting tools – help remove certain demographics, including children, from a target audience. For example, a child who misreports their age is still very likely to remain interested in content designed for their real age and less likely to be interacting with much content designed for adults.

These interest-based factors can be used as a tool to reduce children's exposure to advertising intended for and targeted at an adult audience. For example, an advertising campaign could target ads at a group of users over a certain age that have shown an interest in products or themes typically of interest to adults while excluding those that have shown an interest in content that is directed at or appeals particularly to a youth audience.

Where children do see age-restricted ads, CAP's strict content rules ensure that the content must not appeal particularly to them.

The Guidance

Marketers using interest-based factors to place age-restricted ads should be able to demonstrate that they have taken reasonable steps to exclude the relevant audience e.g. under 16s or under 18s.

Marketers placing such ads online are therefore advised to make good use of targeting options to help ensure that their ads are directed at adult audiences and to reduce the chances of their ads being seen by children; ultimately, the profile of interest-based factors selected or deselected should clearly favour adults over the excluded age group.

- Advertisers should take reasonable steps to ensure that ads that attract a media placement restriction are not placed in media directed at or of particular appeal to those under 16/18.
- Given that some children may have inaccurately reported their ages on social media or other platforms that require or request this information, marketers placing age-restricted ads should take special care to ensure, where possible, that they support their choice of demographic data with behavioural data that similarly biases the target audience, and excludes interests and behaviours very strongly associated with people in the restricted age category.

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- The closer the age profile of the audience targeted by the advertiser is to the age at which CAP's media placement restriction is set, the more care marketers should take to select appropriate targeting information that minimises the chances of the ad being presented in media directed at or of particular appeal to the relevant child audience. For example, an advertiser who is actively choosing to target an age profile of 18-23 year olds for alcohol ads (which must not target those aged 17 or younger) will likely need to exercise more care about their other targeting choices than would an advertiser targeting a 25-plus age profile.
 - In the event that the ASA receives a complaint that an age-restricted ad has been delivered to media directed at or of particular appeal to children, the ASA is likely to expect to see that the marketer has chosen interests that are likely to favour an audience of those older than the restricted age group or, which would, taken in the round, reasonably be said to exclude the restricted age group from its audience.
 - Therefore marketers of age-restricted ads should not select (and should actively deselect) interest information very strongly associated with those who fall into a restricted age demographic. For example marketers might choose to actively deselect interest information relating to a clothing brand of particular appeal to teenagers or a music festival aimed specifically at teenagers.
 - If a marketer wishes to target an ad on the basis of an interest that has a potentially broad age appeal but may also strongly appeal to people under the relevant age, they should combine this with additional interest factors that are likely to have the effect of excluding the restricted age group from the audience. For example, by targeting an ad at only those over 18s within a potential audience group who are interested in both football **and** house-buying.
 - Some ads will attract a low risk. For example, a marketer of an expensive whisky or financial market spread-betting product might target their ad at an age-group of much older adults and choose interest factors which naturally exclude children, e.g. insurance products, family holidays or readers of particular publications.