

# Children's exposure to age-restricted TV ads



## Contents

|  |    |
|--|----|
| Summary .....  | 3  |
| Limiting children’s exposure to age-restricted ads on TV .....   | 5  |
| How we analyse BARB data in this report .....  | 8  |
| Annual exposure to all TV ads.....   | 10 |
| Exposure to TV ads for alcohol products.....   | 12 |
| Exposure to TV ads for gambling products.....  | 17 |
| Exposure to TV ads for food and soft drinks high in fat, salt or sugar (HFSS products)<br>.....  | 23 |
| Children’s exposure to TV ads: comparison with TV ads for toys.....  | 34 |
| Q&A.....   | 35 |
| Contact us .....   | 37 |
| Annex A: Rules restricting the content of TV ads for alcohol, gambling and HFSS<br>products.....                                       | 38 |
| Annex B: Rules restricting the placement of age-restricted ads in non-broadcast media:<br>a summary.....                               | 43 |
| Annex C: Process and methodology to generate data on TV ads for food and soft drink<br>high in fat, salt or sugar (HFSS products)..... | 45 |

## 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 56 years and The UK Code of Broadcast Advertising (written and maintained by the Broadcast Committee of Advertising Practice) for 14 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 under 18's exposure to particular categories of advertisements, for example alcohol and gambling, is appropriately limited: the rules ban these ads in children's and young people's media, and, where they appear in media targeting a predominantly adult audience, the content is restricted to ensure they cannot appeal particularly to under 18s.

**This report looks at children's exposure, over a number of years, to TV ads for alcohol, gambling and food and soft drink products high in fat, salt or sugar (HFSS products); products that attract public policy considerations, including because of the products' potential impact on children and young people.**

2008 represents the first full year in which the gambling advertising rules were implemented and the year in which the rules on HFSS product ads were introduced. The choice of this starting point has implications for the patterns of audience exposure that are identified in this report; it is important to interpret their significance within the context of the parameters selected.

The data indicates, however, that children's exposure to TV ads for alcohol, gambling and food and soft drink products is trending downward in recent years. The available data on children's exposure to TV ads for HFSS products (a sub-set of TV ads for food and soft drink products) is much more limited, but for reasons presented in this report, exposure rates to this category of ads also appear to be trending downwards in recent years.

Some of the key findings are:

- **Alcohol ads:** Between 2008 and 2017, children's exposure to alcohol advertising has decreased by 65% from an average of 2.8 ads per week in 2008 to one ad per week in 2017. In 2010, children's exposure to alcohol ads peaked at an average of 3.2 ads per week, and it decreased by 69.2% to one ad per week in 2017.
- **Gambling ads:** Between 2008 and 2017, children's exposure to gambling ads increased by 25% from an average in 2008 of 2.2 ads per week (the first full year in which ads for gaming and betting were allowed on TV) to 2.8 ads per week in 2017. In 2013, children's exposure to gambling ads peaked at an average of 4.4 ads per week, and it decreased by 37.3% to 2.8 ads per week in 2017.

- **Food and soft drinks ads:** Between 2008 and 2017, children’s exposure to all TV ads for food and soft drink decreased by 46.4% from an average of 35.5 ads per week in 2008 to 19 ads per week in 2017.
- **HFSS food and drink product ads:** In 2016, children saw an average of 12.4 TV ads for HFSS products per week. In 2017, that figure was 9.6 ads, a reduction of 22.9%.
- **All TV ads:** Between 2008 and 2017, children’s exposure to all TV ads decreased by 26.6% from 219.5 ads per week in 2008 to 161.2 ads per week in 2017.
- Children’s exposure to all TV ads reduced by 29.7% from a peak in 2013 of 229.3 ads per week to a low of 161.2 ads per week in 2017. Over the same period, children’s exposure to:
  - TV ads for alcohol decreased by 62.5%;
  - TV ads for gambling decreased by 37.3%;
  - TV ads for food and soft drink decreased by 45.4%.
- Children’s exposure to all TV ads reduced by 15.6% between 2016 and 2017, whereas children’s exposure to TV ads for HFSS products, during the same period, reduced by 22.9%.
- This suggests that the decline in children’s exposure to all TV ads might account for less than a half of the reduction in children’s exposure to TV ads for alcohol between 2013 and 2017; less than a quarter of the reduction in children’s exposure to TV ads for gambling between 2013 and 2017; and about two thirds of the reduction in children’s exposure to TV ads for HFSS products between 2016 and 2017.

The figures reflect the average number of ads seen by children each week over the periods specified. As such, some children see more ads and some see fewer.

The report bears out the downward trend in overall TV viewing among children, and examines whether children’s reduced exposure to these categories of TV ads in recent years merely reflects the impact of their changing media habits towards greater use of online media. In each case, however, the data shows that reductions in children’s exposure to TV ads for alcohol, gambling and HFSS products are greater than the downward trend in overall TV viewing among children. As the scheduling rules have not changed over the years covered by the report, other factors e.g. changes in marketing spend and behaviour, are likely to account for this outcome. The rules continue to help limit children’s exposure, however, to the extent that they ban these ads in significant parts of the broadcast schedule e.g. in or adjacent to programmes of particular appeal to children.

By setting out the actual level of children’s exposure to TV ads for alcohol, gambling and 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. We intend to publish an exposure report annually, including information on children’s exposure to age-restricted ads in online media, which we are currently in the course of gathering.

## Limiting children's exposure to age-restricted ads on TV

### Policy objectives

The UK Code of Broadcast Advertising (the BCAP Code) includes rules to protect children and others whose circumstances seem to put them in need of special protection, while maintaining an environment in which responsible broadcast advertising can flourish. In line with better regulation principles, the rules must be transparent, accountable, proportionate, consistent, and targeted only where regulation is needed.

Under contract with Ofcom, BCAP and the Advertising Standards Authority (ASA) undertake to satisfy section 319 of the Communications Act 2003, which requires, among other things, "(h) that the inclusion of advertising which may be misleading, harmful or offensive in television and radio services is prevented". In addition, section 322 empowers Ofcom to require TV broadcasters to exclude advertisements "from a specified part of a licensed service", and section 335 states that the regulatory regime for TV will include "the conditions that OFCOM consider appropriate for securing that the relevant international obligations of the United Kingdom are complied with". One such international obligation is to enforce restrictions on TV advertising contained in the Audio Visual Media Services Directive 2010 (Directive 2010/13/EU), Article 9 of which includes requirements that "audiovisual commercial communications for alcoholic beverages shall not be aimed specifically at minors" (Article 9, 1. (e)) and "Member States and the Commission shall encourage media service providers to develop codes of conduct regarding inappropriate audiovisual commercial communications, accompanying or included in children's programmes, of foods and beverages containing nutrients and substances with a nutritional or physiological effect, in particular those such as fat, trans-fatty acids, salt/sodium and sugars, excessive intakes of which in the overall diet are not recommended" (Article 9, 2.).

To help achieve its policy objectives and delegated statutory duties, BCAP's scheduling rules ensure that the exposure of children (which the Code defines as those aged 15 and under) and young people (those aged 16 and 17) to particular categories of TV ads is appropriately limited by prohibiting them from being advertised in or adjacent to programmes commissioned for, principally directed at or likely to appeal particularly to audiences below the age of 18 or 16 (depending on the advertised product). Where the ads appear in or adjacent to programmes targeting a predominantly adult audience, the rules restrict the content of the ads to ensure they cannot appeal particularly to under 18s or exploit people who are otherwise vulnerable. Annex A at the end of this document lists the content rules for product ads with age restrictions.

This report focuses on children's exposure to TV ads for alcohol, gambling, and HFSS products. Ads for alcohol and gambling are subject to scheduling restrictions chiefly because legislation explicitly requires or otherwise has the effect of ensuring they are not targeted at under 18s. Against a background of concern about high child obesity rates, Ofcom introduced scheduling restrictions on TV ads for HFSS products "as a means of reducing opportunities to persuade children to demand and consume HFSS products"; the restrictions sought to balance Ofcom's duties to protect children while acknowledging Ofcom's obligations to secure programmes from broadcasters upon whom these restrictions would have a commercial impact.

The BCAP Code also includes scheduling restrictions for a wider range of products and services, including, for example, films and video games with 15+ age ratings, medicines, and

slimming products. Furthermore, there are general restrictions that require advertisers and broadcasters to ensure an ad for any product that features potentially inappropriate content is scheduled appropriately.

The full list of scheduling restrictions can be found in [Section 32 \(Scheduling\)](#) of the BCAP Code.

### Scheduling rules: determining 'particular appeal' of programmes

Broadcasters are required to exclude age-restricted ads from being advertised in or adjacent to programmes commissioned for, principally directed at or likely to appeal particularly to audiences below the age of 18 or 16 (depending on the advertised product)

It is usually straightforward for broadcasters to identify a programme commissioned for or principally directed at children by considering the intended audience of the programme at commissioning or acquisition stage. A clear example of this is programming included on a dedicated children's channel.

For most TV channels operating under an Ofcom licence the likelihood of a programme appealing particularly to children is determined by a process of 'audience indexing', which involves the use of Broadcast Audience Research Board (BARB) data. Audience indexing helps to determine how likely a programme is to reach viewers in a particular age category, relative to the whole audience. The process allows these TV channels to identify a programme (or programme part in the case of long-form programming), before it is broadcast, that appeal disproportionately to children by reference to an age category index score for each programme.

If an age group e.g. 4-15s, has an audience index of 100, it means that that group is proportionally represented in the programme audience in relation to its share of the total TV audience. An index of 120 means it is over-represented by 20%, which BCAP considers to be a sufficiently significant share of the audience to indicate that the programme is likely to have particular appeal to that age group. Therefore, TV channels that have access to BARB data are required to exclude age-restricted ads that achieve an index of 120 or above for the relevant age group.

For TV channels that do not use BARB data or where the audience size is likely to be too small to produce reliable audience composition forecasts, BCAP invites broadcasters to adopt a cautionary approach and draw on other data that is reasonably available to them to them. This is further explained in [BCAP guidance](#) on scheduling and audience indexing.

### References to 'children' and 'adults' in this report

The primary purpose of this report is to focus on children's exposure to TV ads for alcohol, gambling and food and soft drink products high in fat, salt or sugar (HFSS products). Where this report refers to 'children' generally, this captures the BARB age category of 4-15, unless specified otherwise, for example where the analysis further examines the exposure levels for younger children aged between 4-9 and older children aged between 10-15. References to 'adults' in this report cover BARB age categories of 16 years old and above.

## Restricting the placement of age-restricted ads in other media

The ASA intends to publish an exposure report annually, including information on children's exposure to age-restricted ads in online media, which we are currently in the course of gathering. Annex B at the end of this document summarises the rules that are in place to restrict the placement of age-restricted ads in non-broadcast media, including online.

## How we analyse BARB data in this report

### How the data is calculated and presented

This report calculates exposure to TV ads for alcohol and gambling on an average weekly basis for each year from 2008 to 2017, giving a picture of trends over the last decade. The section on HFSS gives an overview of exposure levels for all food and soft drinks advertising, on an average weekly basis per year, from 2008 to 2017, as well as a further analysis into exposure levels for HFSS ads in 2016 and 2017 (for reasons set out on page 23) on both an average weekly and average monthly basis.

2008 was the first full year when all gambling services could legally be advertised on television. Before then, TV ads for sports betting and online casino were prohibited. 2008 was also the year when Ofcom introduced into the BCAP Code scheduling restrictions for HFSS product ads. Alcohol advertising has been subject to a scheduling restriction since the audience indexing approach was adopted by the Independent Television Commission (ITC), a forerunner of Ofcom, in the mid-1990s.

BARB data measures exposure in terms of ‘impacts’ for the audience as a whole and groups within it, e.g. by age category, region or socio-economic status. An impact is an instance of advertising in a chosen category (alcohol, gambling or HFSS) being viewed by the average member of a group, e.g. children aged 4 to 15.

As the number of impacts reflects the number of views, 300 impacts could be one ad viewed 300 times, or 300 ads viewed once each. The statistics for adults’ and children’s exposure in the sections that follow are the number of impacts divided by the number of adults or children in the UK at that point in time, averaged across the year.

This is an important measure as it tells us, on average, how many times per week an average child is exposed to TV ads for the chosen category, for each year. For ease of comparability, we have used this metric as the basis for all the data analysis in this report.

We are mindful that concern about children’s exposure to age-restricted advertising relates both to the ads they receive (and the discrete messages those ads include) and the amount of time those ads (and the messages they include) take up in the schedule: to be as transparent as possible in our account of children’s exposure to these categories of advertising, we report on the number of ads viewed and the length of time over which exposure took place. Readers will note that, at various points in the individual product category sections of the report, these two measures may fluctuate at different rates – the number of messages may go down while the amount of time goes up, or vice versa. The variance is generally modest in scale. The average number of impacts remains the principal metric used in this report, and the values denoting the number of seconds are indicative of the likely length of exposure.

Other measures used in this report include:



- **Total ad impacts** – This measure indicates the number of times that all ads are viewed. The number of total ad impacts in this report relates to children aged between four to 15 years and is presented as a weekly average per year.
- **Children’s exposure as a percentage of adults’ exposure** – The BCAP scheduling rules result in advertising being targeted away from children’s channels or programming and other programming where they are proportionally over-represented in the audience. This measure provides an insight into the efficiency of restrictions intended to appropriately limit children’s exposure to ads for certain product categories. For example, if children’s exposure as a percentage of adults’ exposure to an ad for a particular product is 25%, it means that children see around one of those ads for every four seen by adults.
- **Children’s exposure as a percentage of exposure to all TV ads** – This measure shows how much of all the TV ads seen by children are made up of ads for alcohol, gambling or HFSS, expressed as a percentage.

The youngest BARB age categories are 4-9, 10-15 and 4-15. The older BARB age categories are 16-24, 25-34 and 35+. Where this report refers to ‘children’ generally, this captures the BARB age category of 4-15, unless specified otherwise, for example where the analysis further examines the exposure levels for younger children aged between 4-9 and older children aged between 10-15. References to ‘adults’ in this report cover BARB age categories of 16 years old and above.

Exposure figures presented within this report have been rounded to one decimal place, unless set out otherwise. Any percentages set out related to increases and decreases in exposure levels in a given period are calculated based on unrounded impact figures, and those percentages are then rounded to one decimal place when presented in the report. As such, readers may find a variance if calculating percentage increases or decreases using the rounded figures within this report.



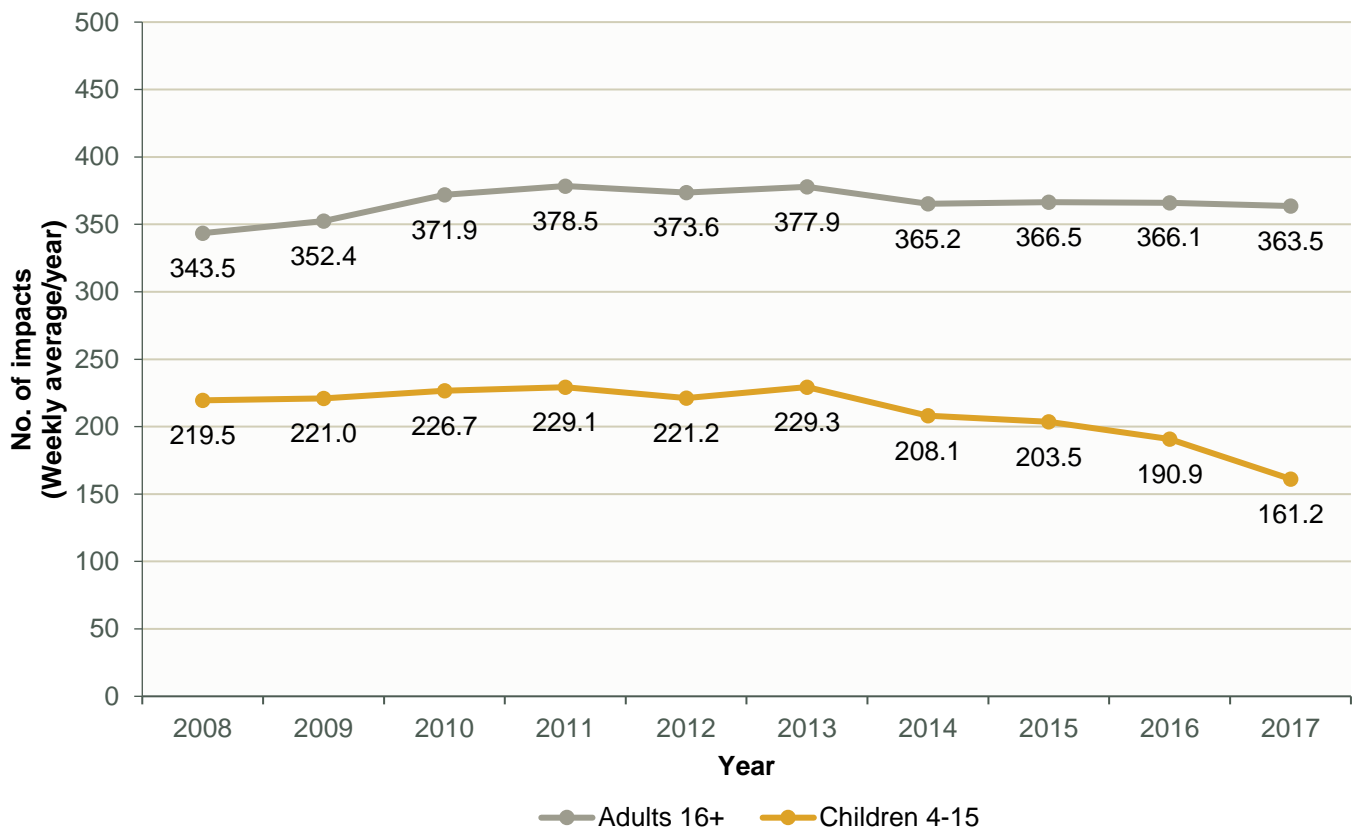
## Annual exposure to all TV ads

This data is intended to provide important contextual information to the category-specific data presented in the following sections of the report.

### Key findings:

- Between 2008 and 2017, children’s exposure to all TV ads decreased by 26.6%, from 219.5 ads per week in 2008 to 161.2 ads per week in 2017.
- In 2017, children saw on average 161.2 TV ads per week, a reduction of 29.7% from a peak of 229.3 ads per week in 2013.
- In 2017, adults saw on average 363.5 TV ads per week, a reduction of 3.9% from a peak of 378.5 ads per week in 2011.
- Children’s ad exposure, relative to adults, has fallen from a peak of 63.9% in 2008 to 44.3% in 2017. That means children see, on average, less than one ad for every two seen by adults in 2017.

### Exposure levels to all TV ads – age groups



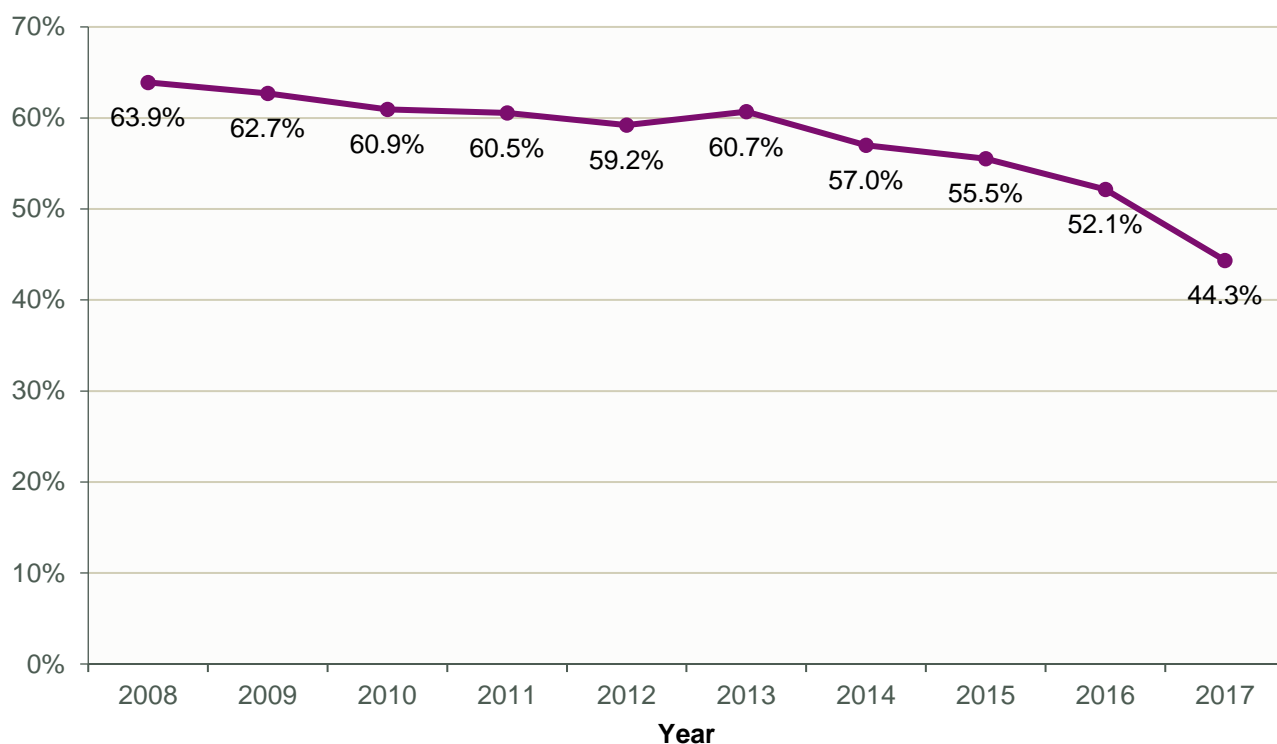
In 2017, the average adult saw a total of 363.5 TV ads per week, while children saw, on average, 161.2 ads per week. In the same year, children between the ages of 4-9 years saw

slightly more ads, an average of 175.1 ads per week, while children aged 10-15 saw slightly fewer, an average of 145.5 ads per week.

Children's increasing use of online media is the main driver behind the decline in their exposure to TV ads in recent years. Although most age groups are spending more time online, the average weekly ad exposure for adults has remained reasonably stable over the last decade. It rose by 10.2% between 2008 and 2011 (from 343.5 ads to a period high of 378.5 ads per week) and then declined by 3.8% between 2013 and 2017 (from 377.9 ads in 2013 to 363.5 ads per week).

Children are watching less live, scheduled television and consuming more on-demand and online video content. Between 2010 and 2017, scheduled television viewing dropped by 40% for children aged 4-9 and by 47% for children aged 10-15<sup>1</sup>. Although children's overall average weekly exposure to TV advertising over the period declined by 26.6% (from 219.5 ads to 161.2 ads per week), children's TV ad exposure has followed that of adults in falling only after 2013. The trend has been much marked, however, with a reduction of 29.7% from a peak of 229.3 ads per week in 2013.

### Exposure to all TV ads – children's exposure as a percentage of adults' exposure



Children's ad exposure, relative to adults, has fallen from a peak of 63.9% in 2008 to 44.3% in 2017. That means children see, on average, less than one ad for every two seen by adults in 2017.

<sup>1</sup> [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0023/116519/childrens-content-review-update.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0023/116519/childrens-content-review-update.pdf) p1



## Exposure to TV ads for alcohol products

The BCAP Code states:

**32.2** *[The following products] may not be advertised in or adjacent to programmes commissioned for, principally directed at or likely to appeal particularly to audiences below the age of 18:*

**32.2.1** *alcoholic drinks containing 1.2% alcohol or more by volume*

**32.4** *[The following products] may not be advertised in or adjacent to programmes commissioned for, principally directed at or likely to appeal particularly to persons below the age of 16:*

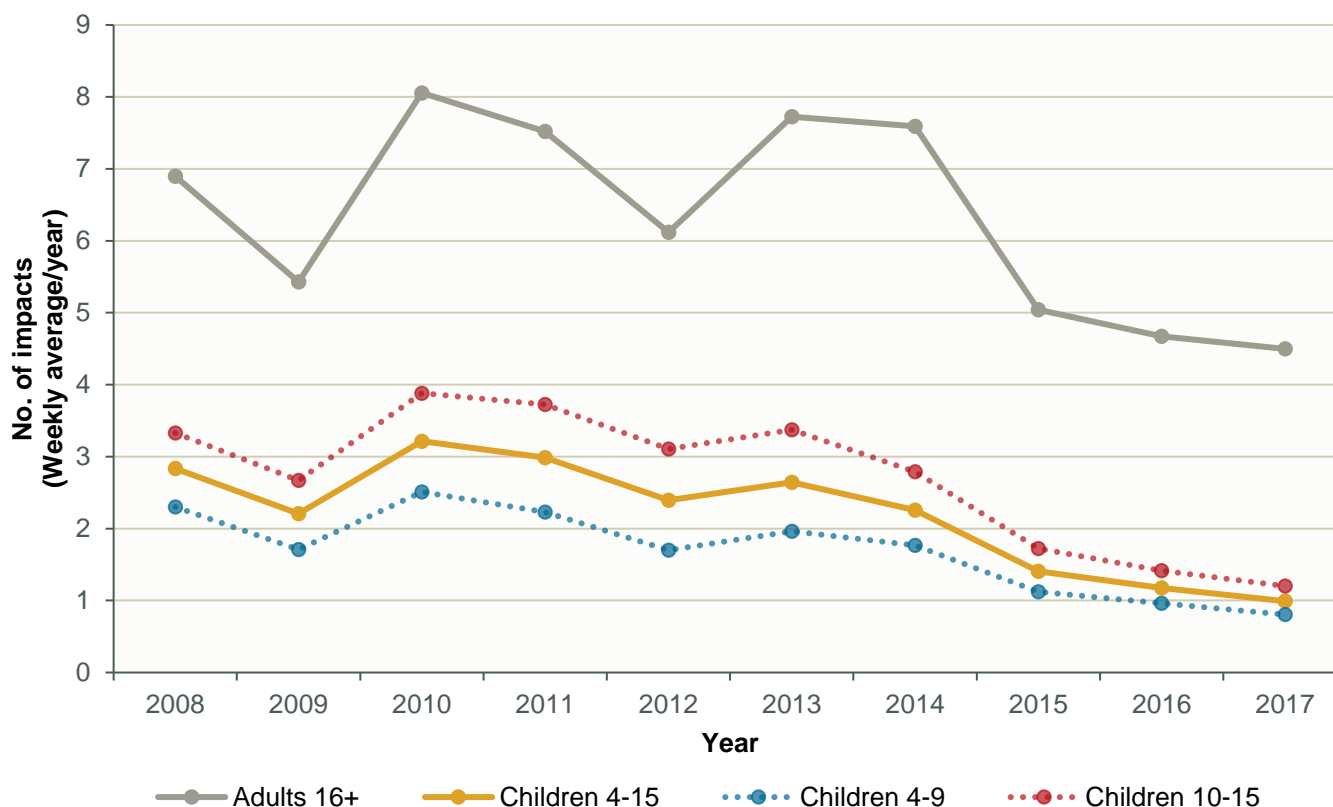
**32.4.7** *drinks containing less than 1.2% alcohol by volume when presented as low-alcohol or no-alcohol versions of an alcoholic drink*

### Key findings

- Between 2008 and 2017, children's exposure to alcohol advertising on TV has decreased by 65% from an average of 2.8 ads per week in 2008 to one ad per week in 2017.
- In 2010, children's exposure to alcohol ads peaked at an average of 3.2 ads per week.
- Children's exposure to alcohol ads, relative to adults, has fallen from a peak of 41.1% in 2008 to 22% in 2017. That means children see, on average, about one TV ad for alcohol for every four or five seen by adults in 2017.
- Alcohol ads made up less than 1.5% of all TV ads seen by children annually over the decade.
- The majority of TV ads for alcohol that children see are ads for beer, cider or perry. In 2011, children saw, on average, a peak of 1.7 ads per week for beer, cider or perry, decreasing to a low of 0.5 ads per week in 2017.
- Children's exposure to all TV ads reduced by 29.7% from a peak of 229.3 ads in 2013 to a low of 161.2 ads in 2017. Over the same period, children's exposure to alcohol ads decreased by 62.5%. This suggests that the decline in children's exposure to all TV ads might account for less than a half of the reduction in children's exposure to TV ads for alcohol.

## ANALYSIS

### Average weekly exposure per year – age groups



In 2008, children’s exposure to alcohol ads decreased from an average of 2.8 ads per week (approx. 75.5 seconds) to 2.2 ads per week (approx. 54.5 seconds) in 2009. This was followed by an increase in 2010 to a peak of 3.2 ads per week (approx. 80.1 seconds). In 2012, exposure levels then fell gradually to 2.4 ads per week (approx. 61.8 seconds), with a slight increment at 2.6 ads per week (approx. 62.6 seconds) in 2013, and then dropped to 2.3 ads per week (approx. 53 seconds) in 2014, at similar levels to 2009. In 2017, there was a further decline in exposure levels down to one ad per week (approx. 22.1 seconds), the lowest in the period between 2008 and 2017.

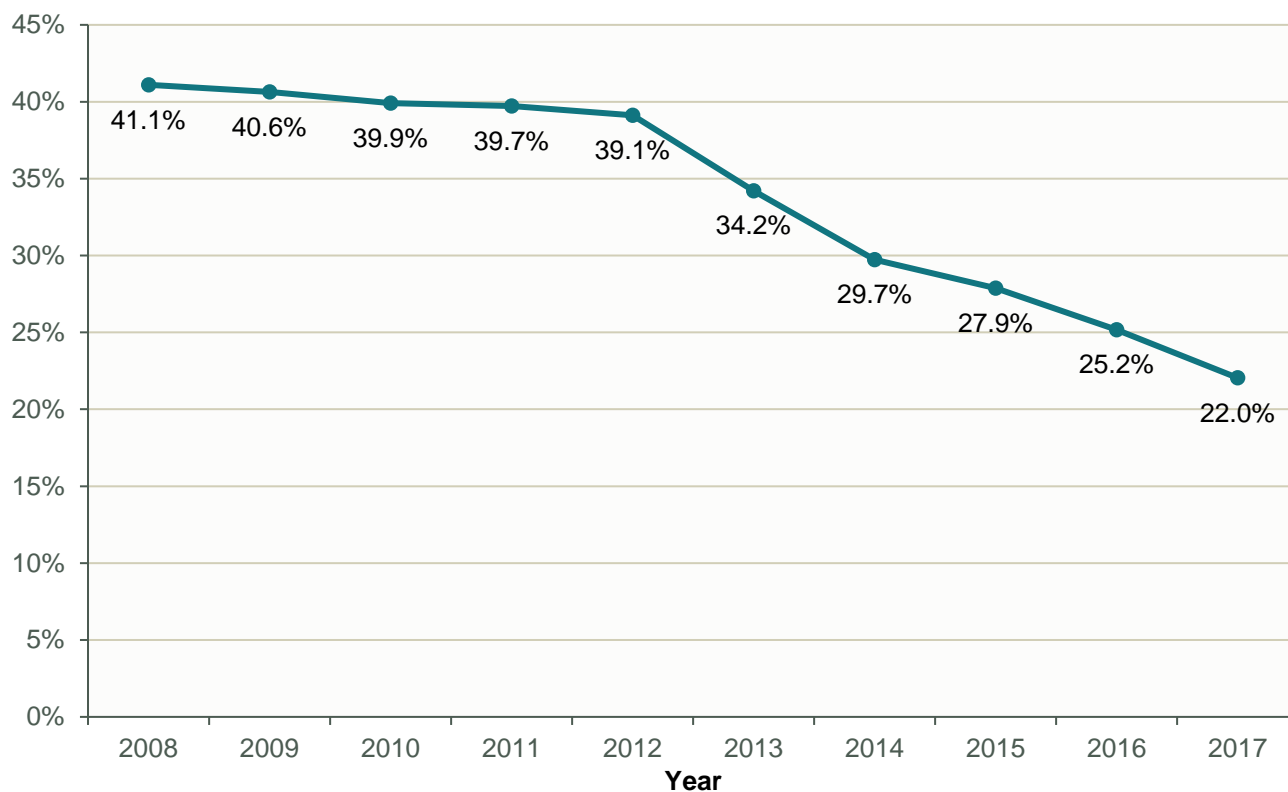
Over the period from 2010 (when alcohol ad exposure was at its highest) to 2017, children’s average weekly impacts were reduced by 69.2%. In 2008, younger children aged between 4 and 9, on average, saw 2.3 alcohol ads per week, 2.5 ads per week during the peak in 2010, and, at the lowest, 0.8 ads per week in 2017. The average number of ads seen by older children between 10 to 15 years old increased in 2008 from 3.3 ads per week to 3.9 ads per week during the 2010 peak. There was a second peak in 2013 at 3.4 ads per week and then exposure dropped to 1.2 ads per week in 2017. The difference between the number of impacts seen by younger children and older children grew smaller as the years progressed.

By comparison, the peaks and troughs in the levels of adults’ exposure to alcohol ad over the 10-year period have been significantly more pronounced. In 2008, the average number of alcohol ads seen each week by adults was 6.9 ads, and dipped to 5.4 ads in 2009. This was followed by a sharp increase in 2010 to 8.1 ads per week and then a drop in 2012 to 6.1 ads. Exposure levels then increased again in 2013 to 7.7 ads per week. This was subsequently

followed by significant reduction in 2014 at 7.6 ads per week to 5 ads per week in 2015 and a slow decrease to 4.5 ads per week in 2017, the lowest level within the 10-year period.

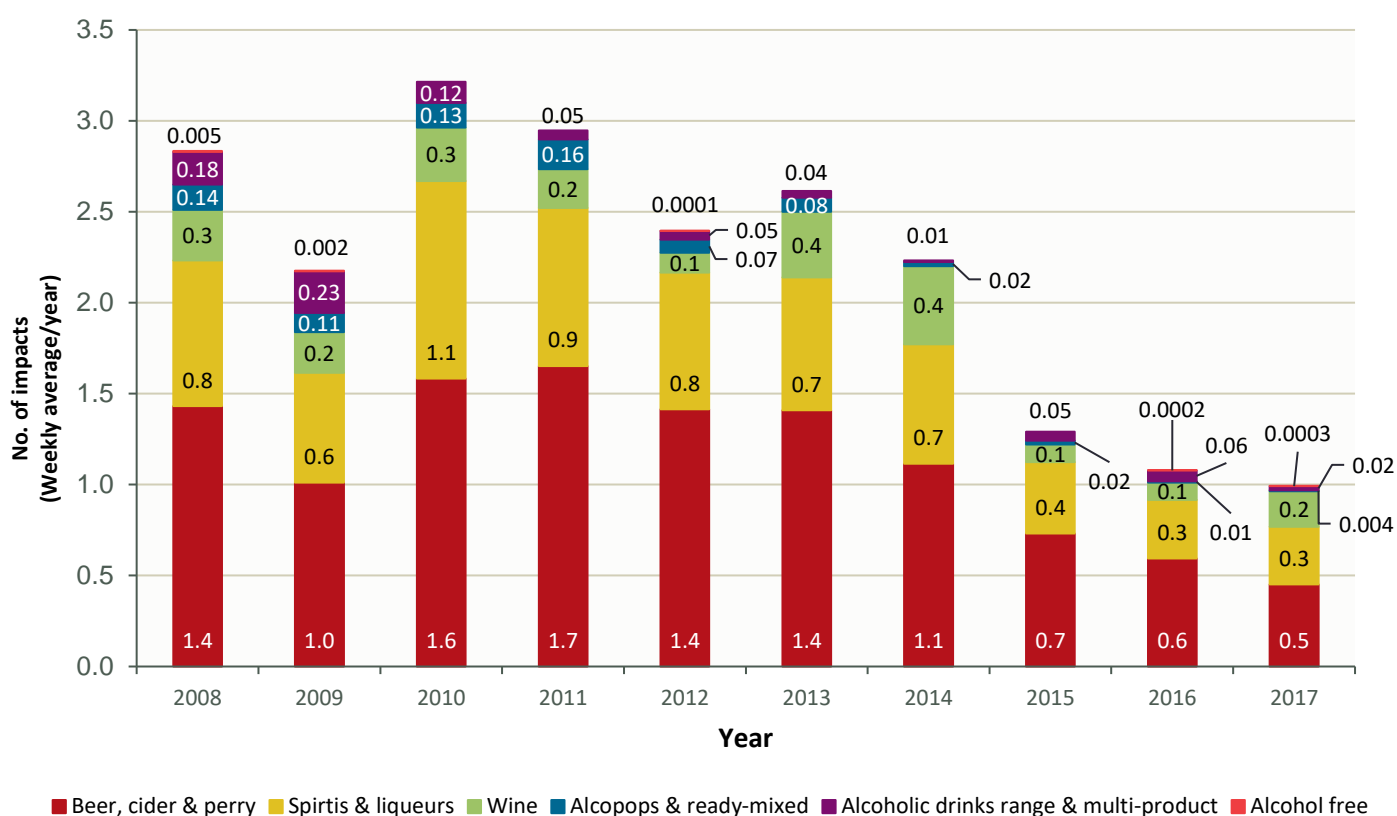
It is notable that, although the trend in children's exposure to TV ads for alcohol products tends to follow that of adults, the fluctuations in adults' exposure between 2009 and 2014 are considerably more pronounced than those for children's exposure.

### Children's exposure as percentage of adults' exposure



Children's exposure to alcohol ads, relative to adults, saw a negligible decrease from 41.1% in 2008 to 39.7% in 2011. The rate of reduction became greater in 2012 from 39.1% to 27.9% in 2015, and then to 22% in 2017, the lowest over the 10-year period. That means children see, on average, about one alcohol ad for every four or five seen by adults in 2017.

## Children's exposure to alcohol ads – Proportion of product types



The majority of TV ads for alcohol that children see are ads for beer, cider or perry. Over the last decade, the highest number of ad impacts for these products was in 2011 at, on average, 1.7 ads per week (56% of all alcohol ads seen by children that year), and the lowest was in 2017 at 0.5 ads per week (45.5% of all alcohol ads seen by children that year). In terms of proportion, beer, cider and perry ads make up of around half of all alcohol ads seen by children over the ten years.

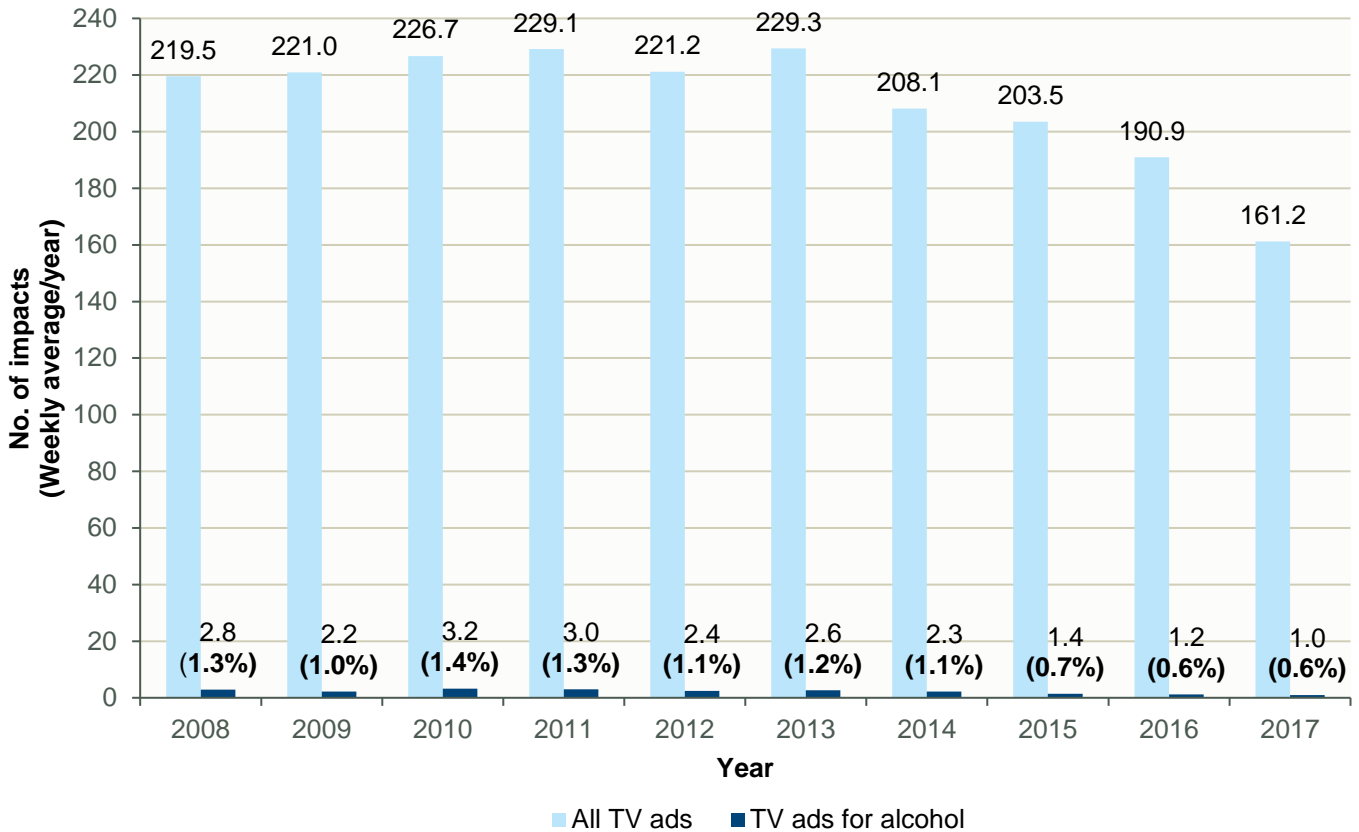
Spirits and liqueurs constitute the second largest proportion of all alcohol ads seen by children. The highest number of ad impacts was in 2010, the year when children's exposure to alcohol ads was at its peak, at an average of 1.1 ads per week (33.8% of all alcohol ads seen by children that year), and the lowest was in 2016 and 2017 at 0.3 ads per week (29.9% and 31.9% respectively of all alcohol ads seen by children over those years). For wine, children's exposure to TV ads for those products was at its highest in 2014 at, on average, 0.4 ads per week (19.3% of all alcohol ads they saw that year) and the lowest was in 2012, 2015 and 2016, at 0.1 ads per week (4.5%, 7.6% and 9% of all alcohol ads they saw in those years respectively).

By contrast, in 2011, the weekly average exposure levels for ads for alcopops and ready-mixed drinks was 0.2 ads (5.5% of all alcohol ads seen by children); this was the highest rate of exposure for these alcohol products in the years covered by the report. The lowest level of exposure to this category was in 2017, at an average of 0.004 ads per week (0.4% of all alcohol ads seen by children that year).

Ads for a range of alcoholic drinks and ads for multi-product alcohol ads e.g. supermarket ads featuring promotional offers on alcohol, ranged between 0.4% and 10.5% of all alcohol

ads seen by children over the decade. Children’s exposure to ads for ‘alcohol free’ drinks (0.05% ABV or less) over the same period is mostly negligible.

### Children’s exposure to alcohol ads as a percentage of exposure to all TV ads



The number of TV ads for alcohol seen by children has stayed below 1.5% of all the ads they saw each week between 2008 and 2017. The highest level was in 2010, in which 1.4% of all ads seen by children were alcohol ads. This then slowly decreased to below the 1% level for the last three years over the 10-year period. In 2017, only 0.6% of all ads seen by children on TV were alcohol ads. Children’s increasing use of online media is likely to have contributed to noticeable changes in overall ad exposure, particularly after 2013 when children’s exposure to all TV ads declined by 29.7% in the average number of ads seen per week. However, over the same period, children’s exposure to alcohol ads has declined by 62.5% over the same period. This suggests that the decline in children’s exposure to all TV ads might account for less than a half of the reduction in children’s exposure to TV ads for alcohol.

As the TV scheduling rules for alcohol ads have not changed over the years covered by the report, other factors e.g. changes in marketing spend and behaviour, are likely to account for this outcome. The rules continue to help limit children’s exposure, however, to the extent that they ban alcohol ads in significant parts of the broadcast schedule.





## Exposure to TV ads for gambling products

The BCAP Code rules state:

**32.2** *[The following products] may not be advertised in or adjacent to programmes commissioned for, principally directed at or likely to appeal particularly to audiences below the age of 18:*

**32.2.2** *gambling except lotteries, football pools, equal-chance gaming (under a prize gaming permit or at a licensed family entertainment centre), prize gaming (at a non-licensed family entertainment centre or at a travelling fair) or Category D gaming machines*

**32.4** *[The following products] may not be advertised in or adjacent to programmes commissioned for, principally directed at or likely to appeal particularly to persons below the age of 16:*

**32.4.1** *lotteries*

**32.4.2** *football pools*

**32.4.3** *equal-chance gaming (under a prize gaming permit or at a licensed family entertainment centre)*

**32.4.4** *prize gaming (at a non-licensed family entertainment centre or at a travelling fair)*

**32.4.5** *Category D gaming machines*

### Key findings

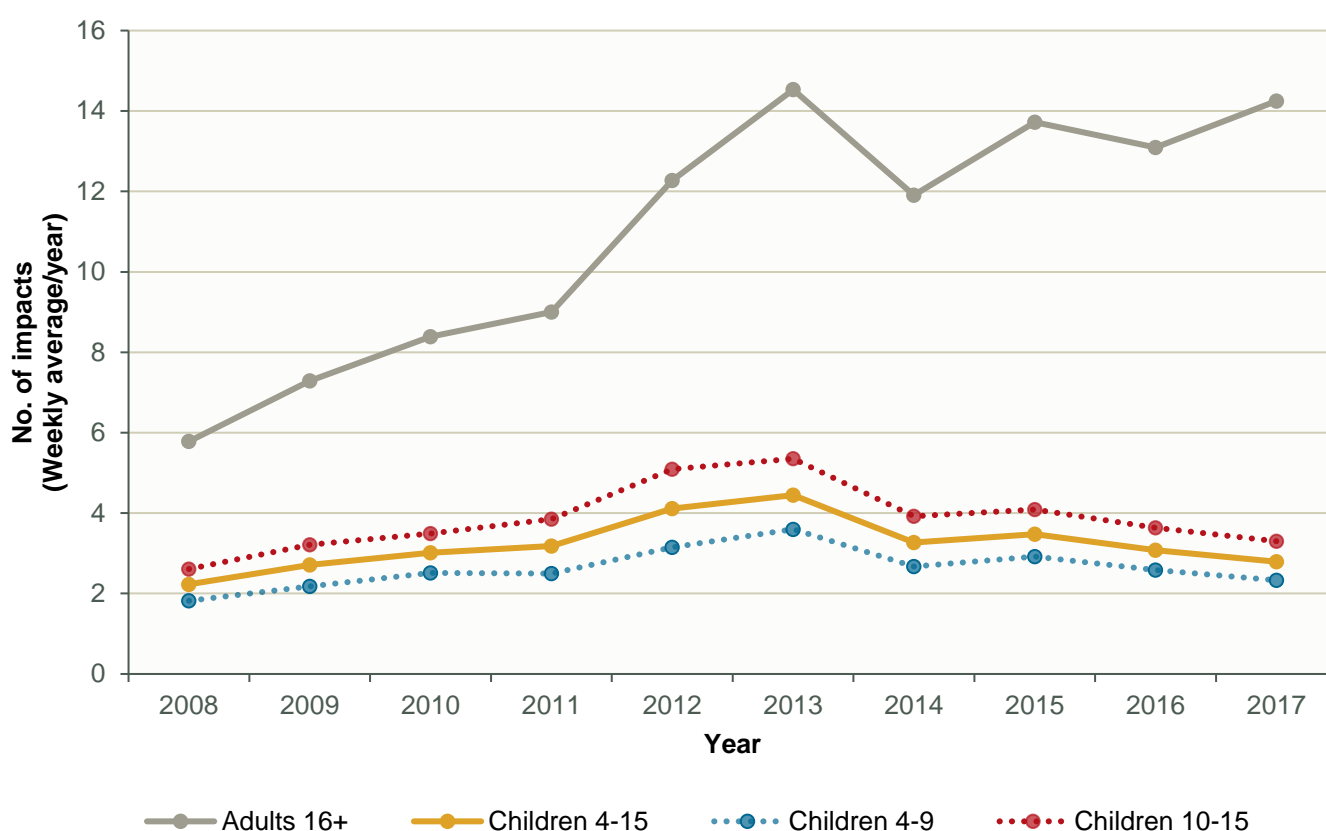
- Between 2008 and 2017, children's exposure to gambling ads increased by 25% from an average in 2008 of 2.2 ads per week (the first full year in which ads for gaming and betting were allowed on TV) to 2.8 ads per week in 2017.
- In 2013, children's exposure to gambling ads peaked at an average of 4.4 ads per week.
- Children's exposure to gambling ads, relative to adults', has fallen year-on-year from 38.6% in 2008 to 19.6% in 2017. That means children see, on average, about one TV ad for gambling for every five seen by adults in 2017.
- Gambling ads made up less than 2% of all the TV ads that children saw on average every year between 2008 and 2017.
- The majority of TV ads for gambling that children have seen since 2011 (the first year when we can be confident about product breakdown information for gambling ads) are ads for bingo, lottery and scratchcards. Children saw, on average, a peak of 1.9 ads

per week for bingo in 2013, decreasing to 0.8 ads per week in 2017, and a peak of 1.3 ads per week for lottery and scratchcards in 2012, decreasing to 0.9 ads per week in 2017. Children’s exposure to ads for sports-betting has decreased from an average of one ad per week in 2011 to 0.4 ads per week in 2017.

- Children’s exposure to all TV ads reduced by 29.7% from a peak of 229.3 ads per week in 2013 to a low of 161.2 ads in 2017. Over the same period, children’s exposure to gambling ads decreased by 37.3%. This suggests that the decline in children’s exposure to all TV ads might account for over three-quarters of the reduction in children’s exposure to TV ads for gambling products.

## ANALYSIS

### Average weekly exposure per year – age groups



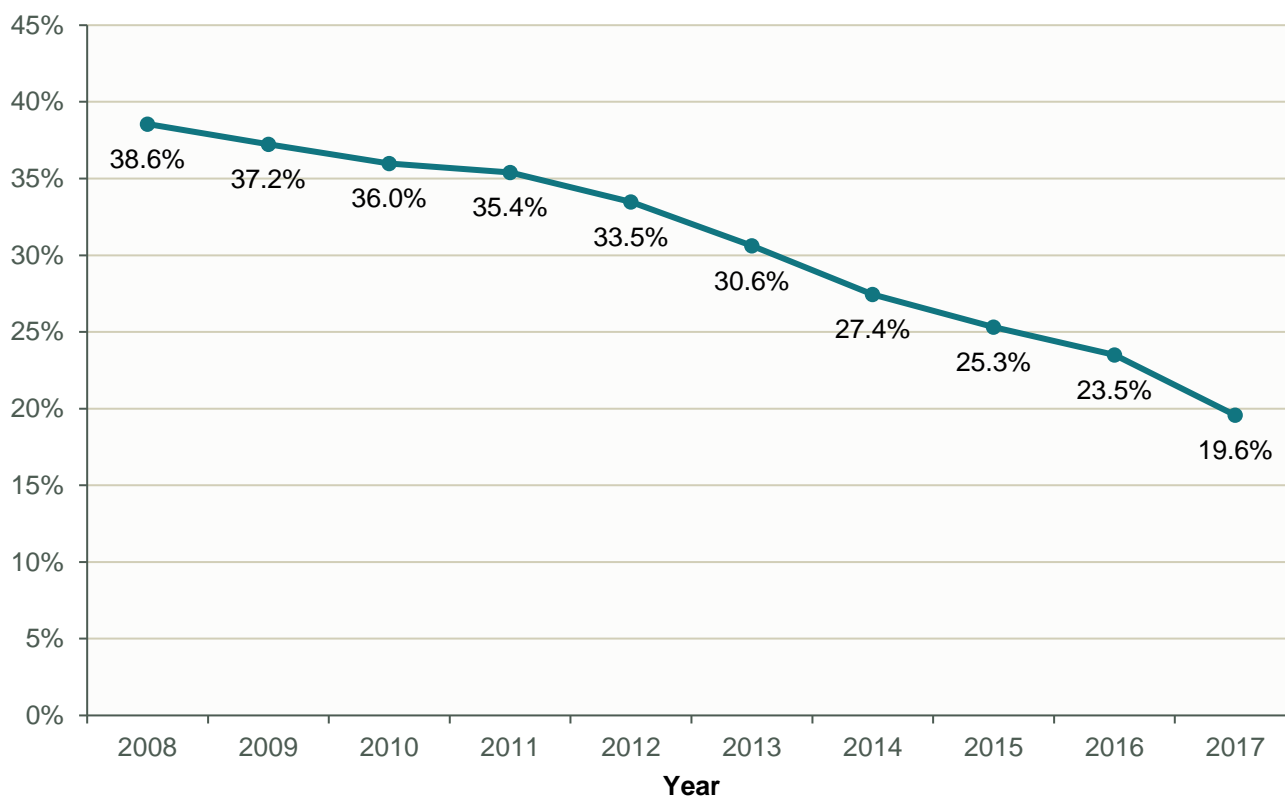
In 2008, children saw, on average, 2.2 gambling ads per week (approx. 48 seconds). In 2011, children’s exposure increased incrementally to 3.2 ads per week (approx. 73.4 seconds) and then further rose to a peak of 4.4 ads per week (approx. 108.9 seconds) in 2013. In 2017, exposure then decreased again to 2.8 ads per week (approx. 65.2 seconds), at levels similar to children’s exposure in 2009, at 2.7 ads per week (approx. 57.9 seconds). Compared to 2013, when gambling ad exposure levels were at their highest at 4.4 ads per week, children saw 37.3% fewer gambling ads per week (2.8 ads) in 2017. For children aged 4-9, the level of exposure was, on average, 1.8 gambling ads per week in 2008, which then slowly increased to 3.6 ads per week in 2013 and then a steady decline to 2.3 ads per week

in 2017. For older children aged 10-15, the level of exposure in 2008 was 2.6 ads per week, which then climbed to 5.4 ads per week in 2013, and fell steadily to 3.3 ads per week in 2017.

By contrast, adults' exposure to gambling ads increased at a faster rate from 2008, at an average of 5.8 ads per week, to 9 ads per week in 2011, and then rose considerably to a peak in 2013, at 14.5 ads per week. The level of adults' exposure then dropped to an average of 11.9 ads per week in 2014 and steadily increased again in 2017 to 14.2 ads per week, which was just below the exposure level in 2013. The liberalisation of advertising controls resulting from the Gambling Act 2005, which came into effect in 2007 (2008 was the first full calendar year of implementation), makes it unsurprising that exposure increased markedly after 2007: before then, only lottery, football pools and bingo products could be advertised on TV. 2007 and the years immediately following are likely to have constituted a period of considerable market development and change. Both adults' and children's exposure levels saw a peak in 2013, the year before additional legislation was introduced that required gambling operators outside the UK to hold a UK operating licence and to pay tax on revenue generated within the UK.

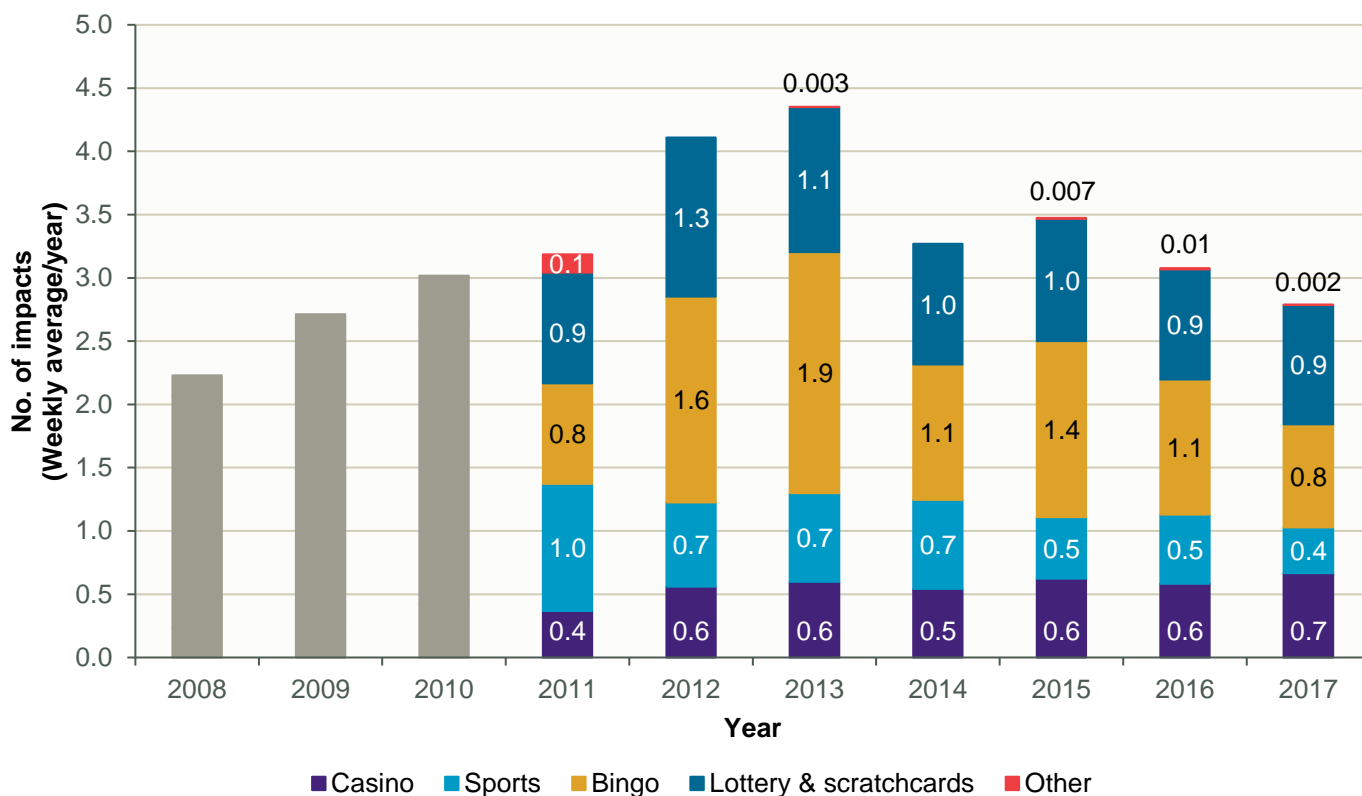
Adults' exposure to gambling ads has followed a marked upward trend over the period covered in this report. On the other hand, children's exposure levels over the same period did not follow a similar pattern of increase and levels in recent years have returned from a slight peak in 2013 to similar levels as at the beginning of the ten year period with less pronounced peaks and troughs. It is important to note, however, that 2008 was the first full year when the liberalised regime for gambling advertising on TV came into effect.

### Children's exposure as a percentage of adults' exposure



The rate of children’s exposure as a percentage of adults’ exposure has declined continuously at a steady rate. In 2008, children’s exposure to gambling ads, relative to adults’, was 38.6%. In 2013, the year that saw a peak in both adults’ and children’s exposure levels, children’s exposure to gambling ads, relative to adults’, was 30.6%. This continued to decrease to 19.6% in 2017, which was the lowest over the 10-year period.

### Children’s exposure to gambling ads – proportion of product types



The product classification data from 2008 to 2010 does not permit a breakdown of children’s exposure to TV ads for bingo, lottery or scratchcards, so the detailed product breakdown in the above chart begins in 2011. However, we are confident that the total number of ad impacts for the gambling category as a whole is accurate for the period 2008-2010.

In 2011, ads for sports-related gambling made up the largest proportion of all gambling ads that children were exposed to, at an average of one ad per week, which constituted 31.5% of all gambling ads seen by children that year. The levels of children’s exposure to sports related gambling ads continued to decrease from then to an average of 0.4 ads per week (13% of all gambling ads seen by children) in 2017, which was the lowest level of exposure over the ten year period.

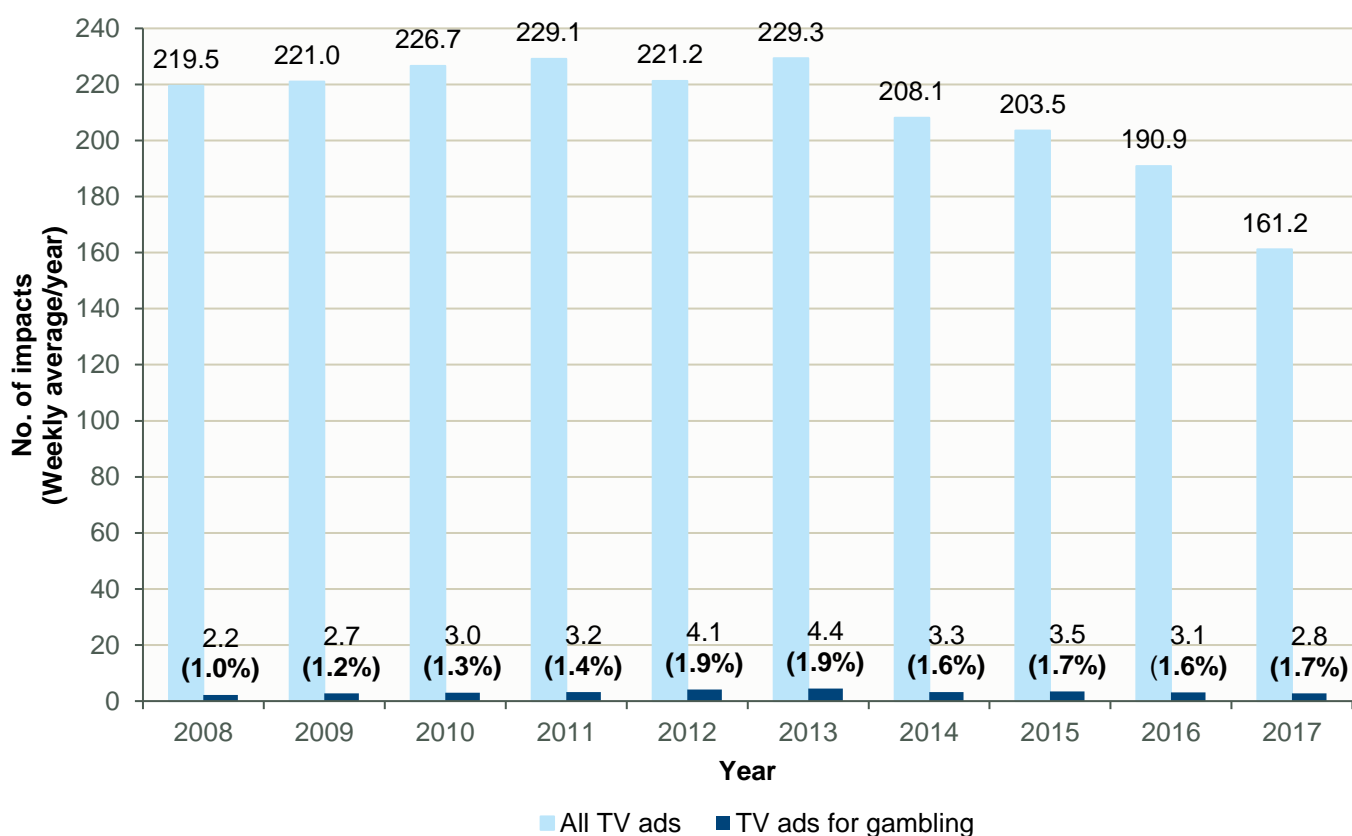
Children’s exposure to bingo ads in 2011 was, on average, 0.8 ads per week (25% of all gambling ads seen by children). This further rose to a peak at 1.9 ads per week (43.7% of all gambling ads children saw) in 2013, the year in which levels of children’s exposure to

gambling ads were at its highest. It was followed by a gradual decrease, with a slight increment in 2015 at 1.4 ads per week (40%), to 0.8 ads per week (29.2%) in 2017. Bingo ads made up the majority of gambling ads seen by children between 2012 and 2016.

Exposure levels for lottery and scratchcards ads followed a broadly similar pattern. In 2011, children saw an average of 0.9 ads for those products per week (27.5% of all gambling ads they saw). In 2012, this increased to 1.3 ads per week (30.6% of all gambling ads seen by children) and then decreased slowly to 0.9 ads per week (33.8%) in 2017. Bingo, lottery and scratchcards ads combined made up most of the gambling ads that children were exposed to between 2011 and 2017.

Children’s exposure to casino ads has increased incrementally over the 7-year period, from an average of 0.4 ads per week (11.6% of all gambling ads seen by them) in 2011 to 0.7 ads per week in 2017 (23.9%). In relation to ads for other types of gambling products, such as spread betting, racecourses, tipsters, children’s exposure levels to those ads were, on average, 0.1 ads per week (4.5% of all gambling ads seen by children) in 2011. Exposure to those types of ads then decreased from 2012 to near negligible levels.

### Children’s exposure as a percentage of exposure to all TV ads



Gambling ads have remained at or below 2% of all TV ads seen by children over the 10-year period. In 2008, children’s exposure to gambling ads constituted 1% of all TV ads they saw. This rose incrementally to a peak of 1.9% in 2013, and then decreased to 1.7% in 2017.

Children's exposure to all TV ads reduced by 29.7% from a peak of 229.3 ads in 2013 to a low of 161.2 ads in 2017. Over the same period, children's exposure to gambling ads decreased by 37.3%. This suggests that the decline in children's exposure to all TV ads might account for over three-quarters of the reduction in children's exposure to TV ads for gambling products. Adults' exposure levels have not declined appreciably, however, remaining at an average of 14.2 ads per week. This suggests that the overall increase in gambling advertising is being directed away from children considerably and toward adult audiences.

As the TV scheduling rules for gambling ads and the voluntary industry initiatives<sup>2</sup> related to TV scheduling have not changed over the years covered by the report, other factors e.g. changes in marketing spend and behaviour, are likely to account for the reduction in children's exposure to TV ads for gambling, over and above their reduced exposure to TV ads in general. The rules and the voluntary initiatives continue to help limit children's exposure, however, to the extent that they ban gambling ads in significant parts of the broadcast schedule.

---

<sup>2</sup> See the [IGRG Code on responsible advertising](#) pages 8-9



## Exposure to TV ads for food and soft drinks high in fat, salt or sugar (HFSS products)

The BCAP Code rules state:

**32.5** *[The following products] may not be advertised in or adjacent to programmes commissioned for, principally directed at or likely to appeal particularly to audiences below the age of 16:*

**32.5.1** *food or drink products that are assessed as high in fat, salt or sugar (HFSS) in accordance with the nutrient profiling scheme published by the Food Standards Agency (FSA) on 6 December 2005. Information on the nutrient profiling scheme is now available on the Department of Health website.*

At present, commercial databases that produce TV advertisement impact data do not, to the standards set out in the report, differentiate HFSS products ads from ads for non-HFSS food and drinks. Therefore, in order to generate this data to support our analysis of audience exposure to TV ads for HFSS products, the ASA commissioned an expert third party, TRP Research, (a BARB audience bureau), and consulted with Ofcom on the methodology of the analysis. The data produced is limited to 2016 and 2017 because of inherent time and cost restraints associated with gathering data, as set out in Annex C.

However, similar to data for other key product categories presented in the report, we have calculated exposure figures for all food and soft drink advertising on an average weekly basis per year, given that such data is available for the period from 2008 to 2017.

### Key findings

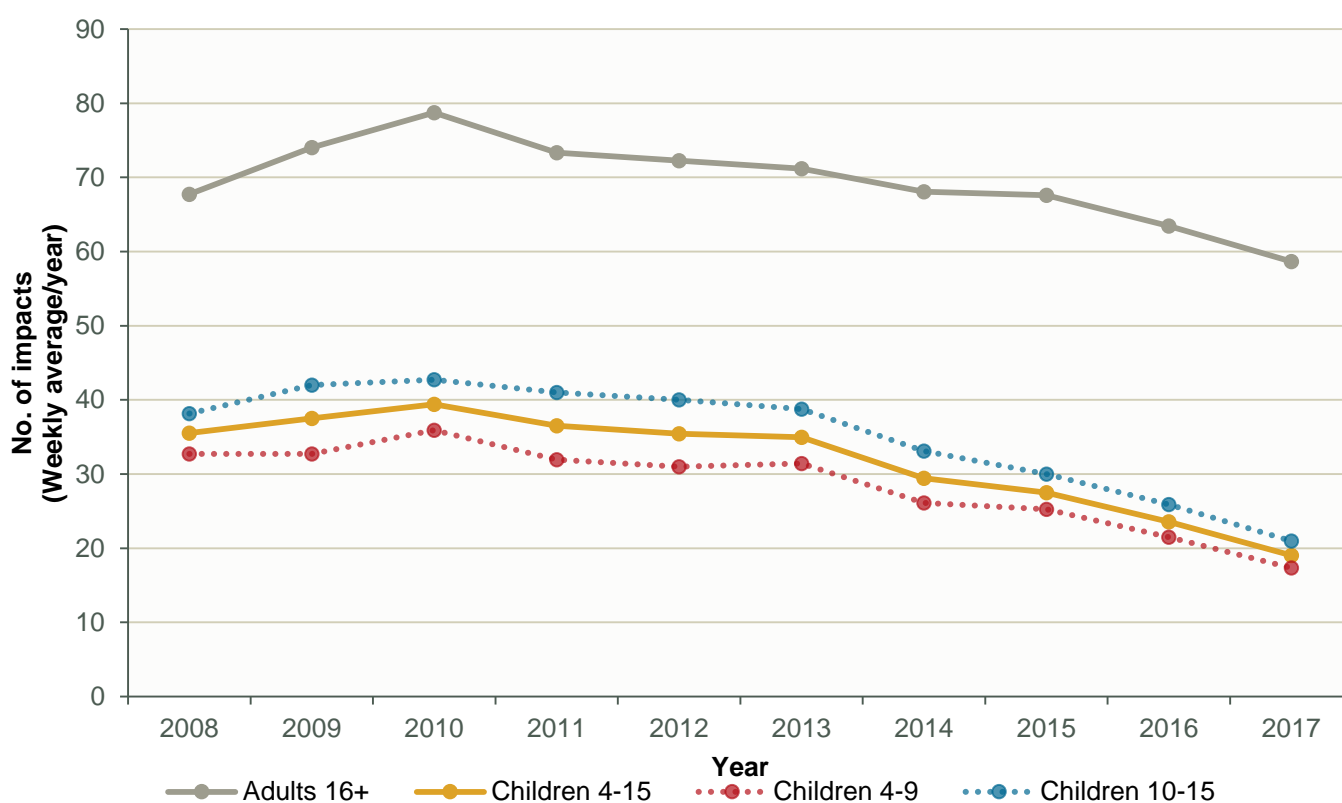
- Between 2008 and 2017, children's exposure to all TV ads for food and soft drink decreased by 46.4% from an average of 35.5 ads per week in 2008 to 19 ads per week in 2017.
- Children's exposure to all TV ads reduced by 29.7% from a peak of 229.3 ads per week in 2013 to a low of 161.2 ads in 2017. Over the same period, children's exposure to TV ads for food and soft drink decreased by 45.5% (from 35 ads to 19 ads). This suggests that, during this period, the decline in children's exposure to all TV ads might account for just over three-fifths of the reduction in children's exposure to TV ads for food and soft drink products.
- In 2016, children saw an average of 12.4 TV ads for HFSS products per week. In 2017, that figure was 9.6 ads; a reduction of 22.9%. Over the same period, children's exposure to all TV ads reduced by 15.6% from an average of 190.9 ads per week to 161.2. This suggests that the decline in children's exposure to all TV ads might account for about two-thirds of the reduction in children's exposure to TV ads for HFSS products over this two year period.
- In 2016, children saw, on average, 1.4 more ads per week for HFSS products than for non-HFSS products (12.4 ads and 11.1 ads, respectively). In 2017, children saw, on

average, 0.2 more TV ads per week for HFSS products than for non-HFSS products (9.6 ads and 9.4 ads respectively).

- Children’s exposure to TV ads for HFSS products, relative to adults’, was 29.6% in 2016 and 25.7% in 2017. That means children saw, on average, in 2017, about one TV ad for HFSS products for every four seen by adults.
- In 2016, HFSS product ads made up of 6.5% of all TV ads seen by children and 6% in 2017.

## ANALYSIS

### Exposure levels to all food and soft drink ads – age groups



This section begins with some contextual information relating to trends in audience exposure to TV ads for food and soft drink<sup>3</sup>, which includes ads that have the effect of promoting a food

<sup>3</sup> Where this report comments on the levels of exposure to TV ads for food and soft drinks covering the period between 2008 and 2017, the data for 2016 and 2017 were based on the sum of exposure figures for non-HFSS product ads, HFSS product ads and ads in which no product had been identified for NPM scoring, as validated by TRP. For 2008 to 2015, the report relies on publicly available data for BARB categories that fall within the definition of Food and Drink. It should be noted that during the validation process, it was found that some ads in 2016 and 2017, which were identified as having the effect of promoting HFSS, did not fit within BARB categories that sought to capture Food or Drink products (exposure figures for these ads are included in the overall HFSS product ad exposure figures for 2016 and 2017).



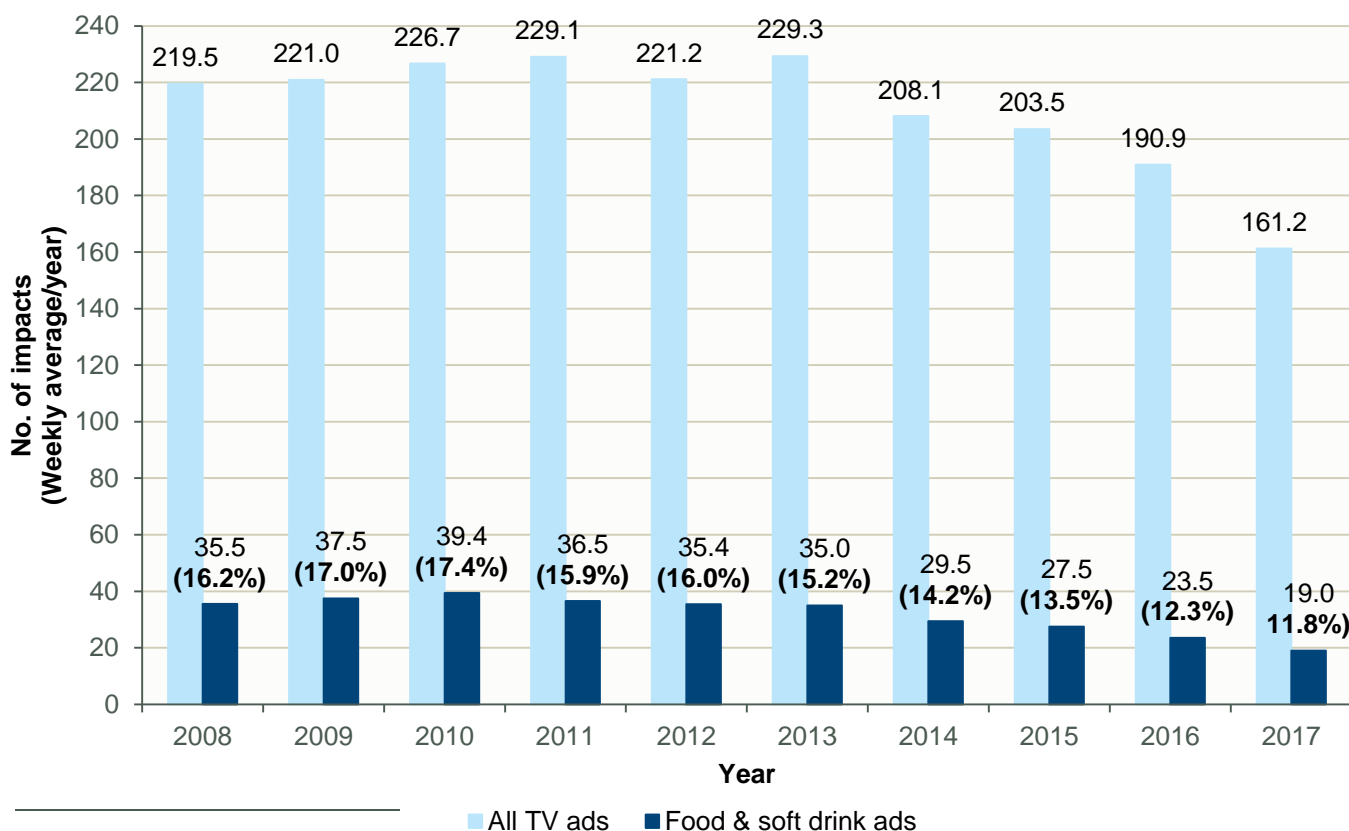
or soft drink e.g. an ad that also promotes a restaurant, a supermarket, a food brand, etc. At this stage, the analysis provides no commentary on the proportion of these ads that may promote an HFSS product or a non-HFSS product. Further analysis and commentary on exposure levels for HFSS product ads and the relative proportion of HFSS product ads and non-HFSS product ads are set out from page 26 of this report.

In 2008, children saw an average of 35.5 TV ads for food and soft drink per week (approx. 847.3 seconds), followed by an increase to a peak in 2010 of 39.4 ads per week (approx. 949.1 seconds). (It should be noted that in its final review of the restrictions on TV ads for HFSS products, Ofcom estimated that between 2005 to 2009, children saw around 37% less ads for HFSS products.<sup>4</sup>) In 2017, exposure levels then fell steadily to 19 ads per week (approx. 428.2 seconds), which constitute a 51.7% reduction over the eight years.

Adults' exposure to TV ads for food and soft drink increased from an average of 67.7 ads per week in 2008 to a peak of 78.7 ads per week in 2010, the highest level in the period between 2008 and 2017. It then gradually decreased from 2010 to an average of 58.7 ads per week in 2017, which constitutes a 25.5% reduction over eight years.

From 2010, the peak level of audience exposure to TV ads for food and soft drink, to 2017, the lowest level of exposure, children's exposure has declined by 51.7% and adults' exposure has declined by 25.5%. Over the same period, children's exposure to all TV ads declined by 28.9% (from 226.7 to 161.2 ads per week), and adults' exposure declined by 2.2% (from 371.9 to 363.5 ads per week).

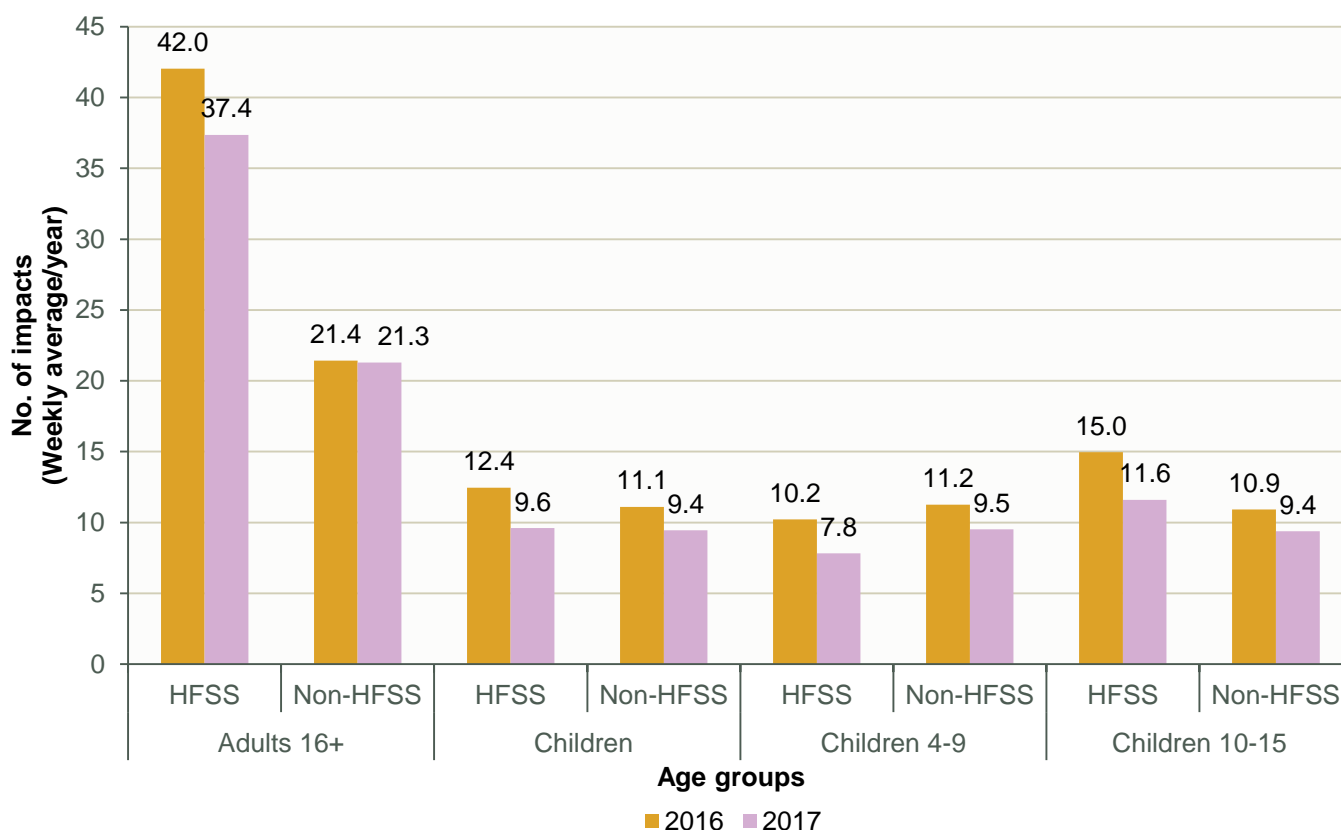
### Children's exposure as a percentage of exposure to all TV ads – all food and soft drink ads



<sup>4</sup> [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0024/31857/hfss-review-final.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0024/31857/hfss-review-final.pdf) p. 3

The number of food and soft drink ads seen by children remained below 18% of all of the ads seen by them over the 10-year period. In 2008, 16.2% of all ads seen by children were food and soft drink ads. This increased to a peak of 17.4% in 2010 and fell to 11.8% in 2017, the lowest within the 10-year period.

### Exposure to HFSS product ads vs non-HFSS product ads in 2016 – 2017 – age groups

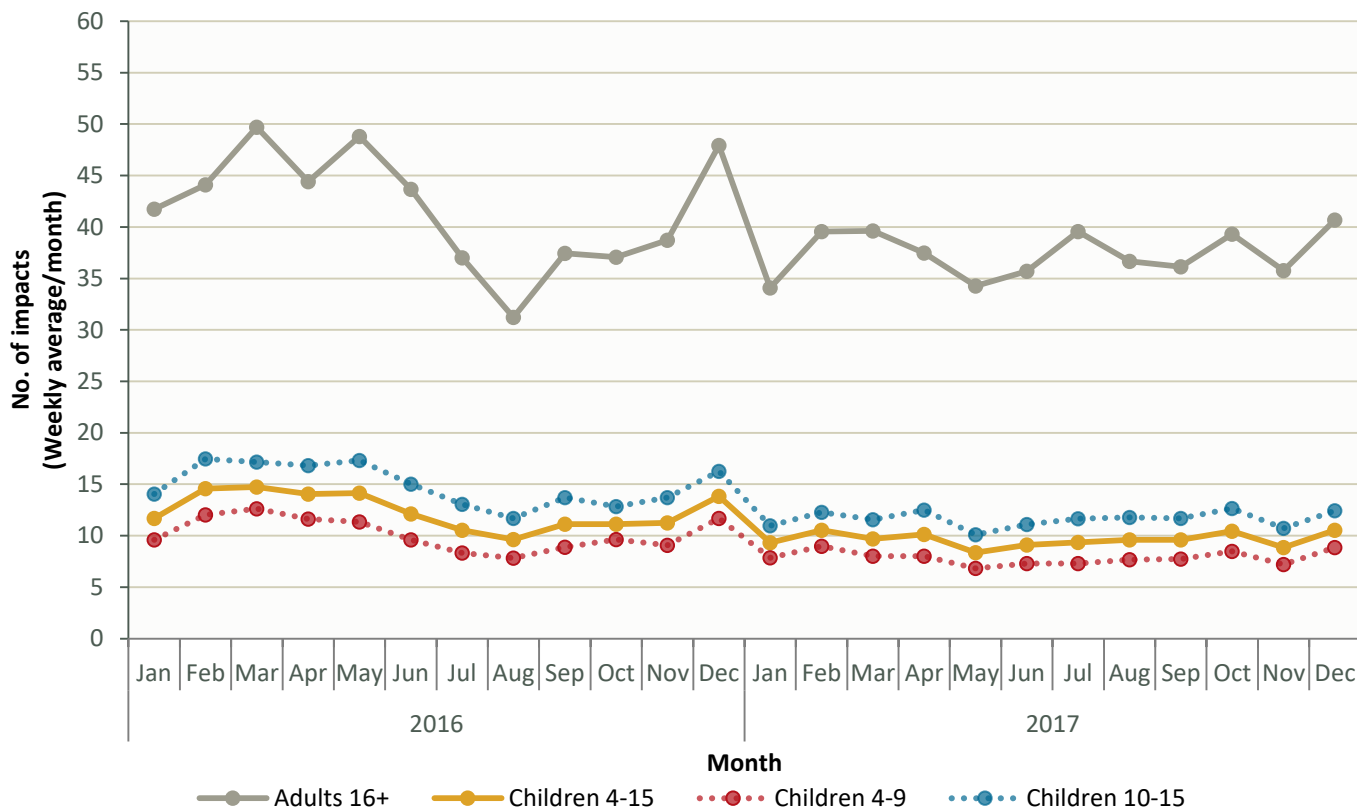


In 2016, children saw, on average, 12.4 TV ads for HFSS products (approx. 288.7 seconds) per week<sup>5</sup>, which declined to 9.6 ads (approx. 212.6 seconds) in 2017. In relation to non-HFSS food and drink ads, they saw 11.1 ads (approx. 266.2 seconds) per week in 2016 and 9.4 ads (approx. 215.6 seconds) in 2017.

For adults, they saw, on average, 42 TV ads for HFSS products per week in 2016, which declined to 37.4 ads in 2017. They saw 21.4 non-HFSS food and drink TV ads per week in 2016 and practically the same amount in 2017: 21.3 ads per week.

<sup>5</sup> The overall exposure figures for HFSS product ads for the years 2016 and 2017 includes overall exposure figures for ads in which no product could be identified for NPM scoring by TRP. These ads are treated as HFSS product ads for the purpose of the report.

## Average weekly exposure to HFSS product ads per month – age groups



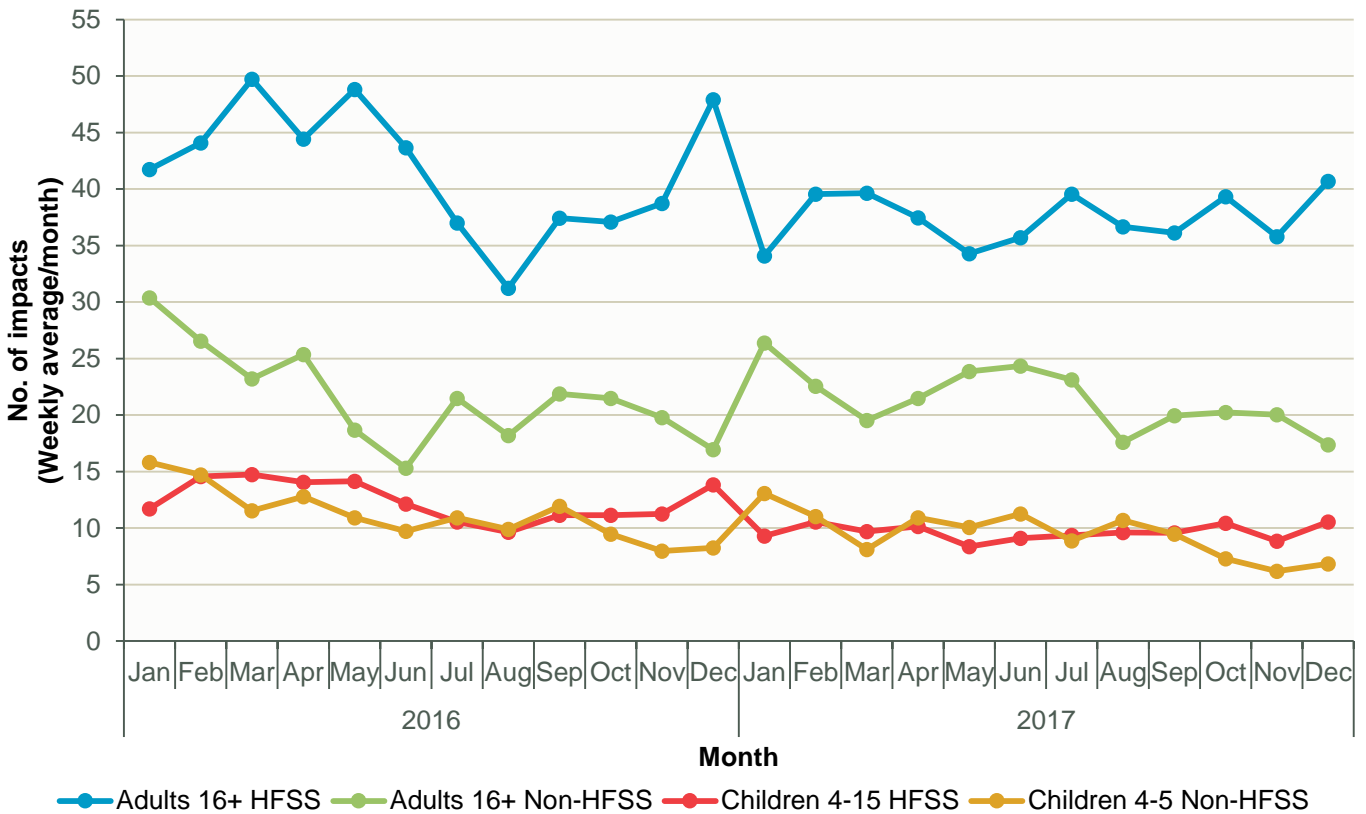
The monthly exposure levels to TV ads for HFSS products indicate that in 2016, children’s exposure to HFSS product ads in January was, on average, 11.7 ads per week (approx. 269.7 seconds). Exposure levels in the months of February to May remained above at or 14 ads per week, with a peak in March of 14.7 ads per week (approx. 344.0 seconds), which was also the highest level in 2016. This was followed by a steady decline towards the summer months to 9.6 ads (approx. 220.7 seconds) per week in August, the lowest point in the year. Levels then gradually increased during the autumn months to 13.8 ads per week (approx. 314.3 seconds) in December.

In 2017, levels of children’s exposure to HFSS product ads over the 12 months were much steadier in comparison to 2016. In January, children saw, on average, 9.3 ads for HFSS products per week (approx. 191.1 seconds). In February, this increased to 10.5 ads per week (approx. 227.6 seconds), the highest level in 2017. There was a decrease in April from 10.1 ads (approx. 227.4 seconds) to 8.4 ads (approx. 186.3 seconds) per week in May. Exposure levels between June and September remained between 9.1 ads (approx. 200.5 seconds) and 9.6 ads (approx. 199.7 seconds) per week, before an increase back to the highest level of 10.5 ads per week (approx. 266.6 seconds) in December.

Older children aged 10 to 15 years are seeing slightly more HFSS product ads than younger children between the ages of 4 to 9.

In contrast, adults’ exposure to HFSS product ads fluctuated more acutely than children’s exposure, particularly during 2016, with a notable drop from May, at 48.8 ads per week to August, at 31.2 ads per week. There was also a significant spike in December 2016, to 47.9 ads per week.

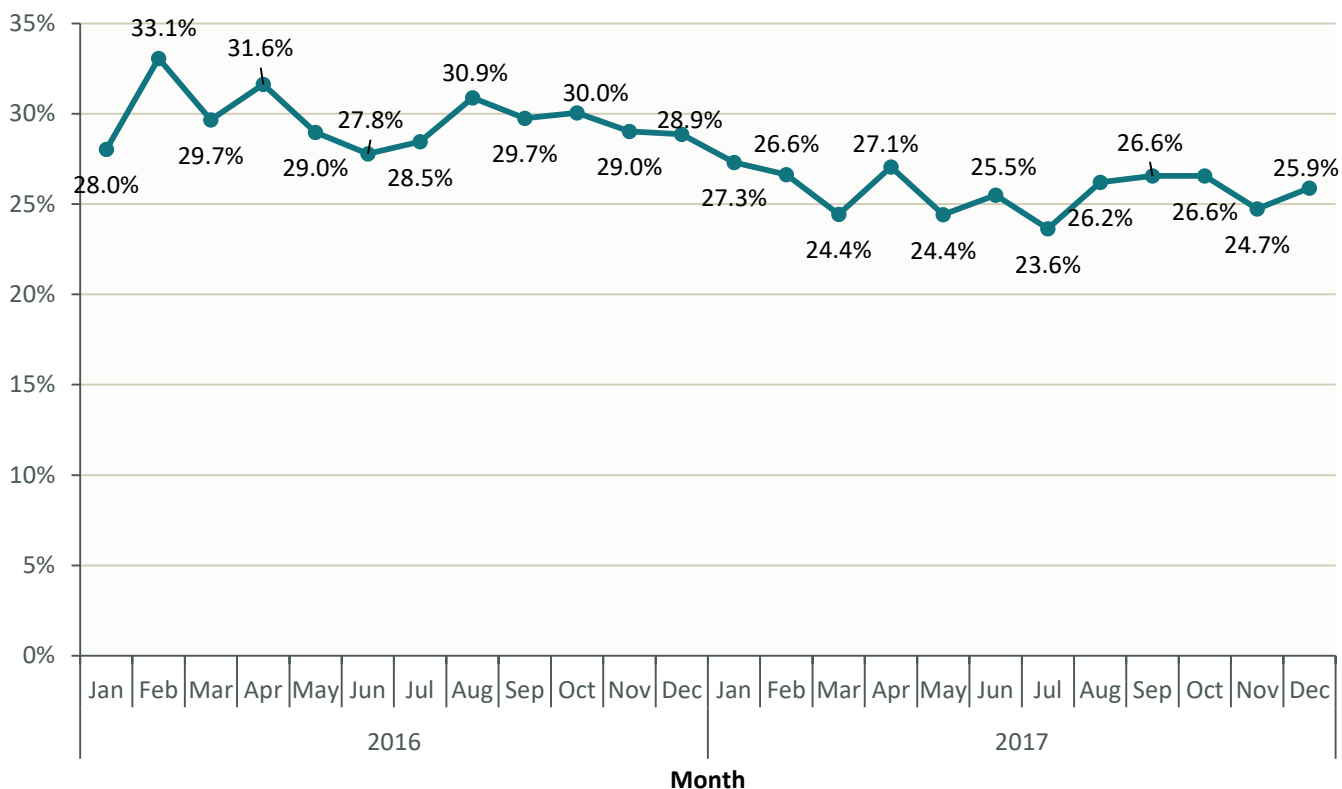
### Adults' and children's exposure to both HFSS and non-HFSS food and drink ads



The 24-month breakdown for the years 2016 and 2017 shows that children sometimes see more ads for HFSS products than ads for non-HFSS products, and sometimes they see fewer ads for HFSS products than ads for non-HFSS products. Over the last quarter of 2016 and 2017, which includes the run up to Christmas, children saw, on average, more ads for HFSS products than ads for non-HFSS products; the opposite is the case for January of each year.

By contrast, adults consistently see more ads for HFSS products than ads for non-HFSS products.

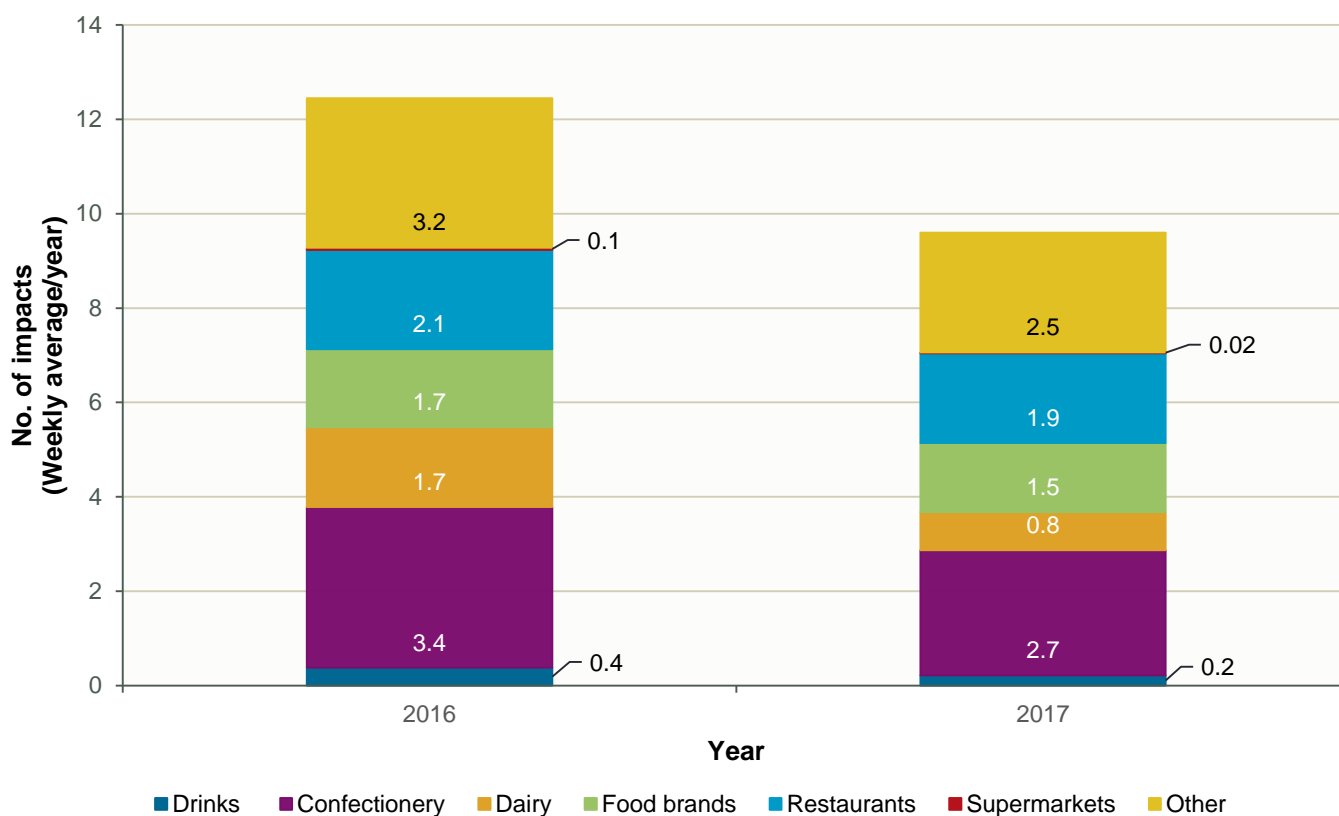
## Children’s exposure as a percentage of adults’ exposure – HFSS product ads



Children’s exposure to TV ads for HFSS products, relative to adults’, was 29.6% in 2016 and 25.7% in 2017. That means children saw, on average, in 2017, about one TV ad for HFSS products for every four seen by adults.

Over the 12-month period in 2016, children’s exposure to TV ads for HFSS products, relative to adults’, was at its highest at 33.1% in February and lowest at 27.8% in June. In 2017, children’s exposure to HFSS product ads, relative to adults’, was at a peak of 27.3% in January, and at a low of 23.6% in July.

## Children’s exposure to HFSS product ads – proportion of product types



HFSS products have in common high fat, salt or sugar content, but they constitute a wide range of food and soft drinks, which at a product and/or a category level, may appeal more to some age demographics and less or not at all to others. For example, certain HFSS confectionary products may have more appeal to children than to adults and categories of HFSS dairy, HFSS bakery and HFSS ready meal products may have minimal appeal to children.

In 2016, children saw, on average, 3.4 HFSS confectionary ads per week (27.4% of all HFSS product ads seen by children), which declined to 2.7 ads (27.6% of all HFSS product ads seen by children) in 2017. Confectionary HFSS ads made up the largest proportion of HFSS product ads seen by children over the two years.

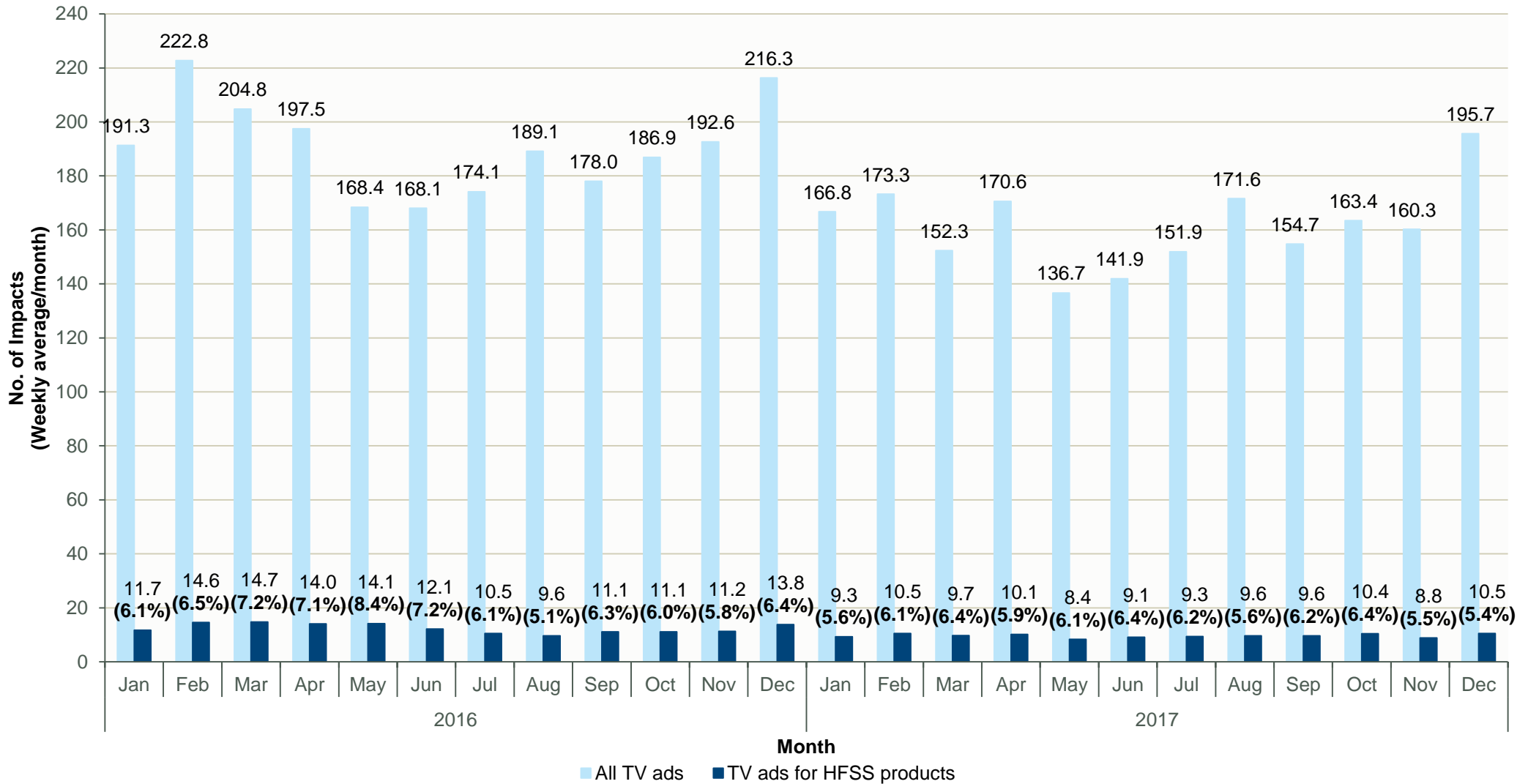
The second largest proportion of HFSS product ads seen by children combine HFSS groceries, fish, ready meals, deli, frozen, ‘free from’ foods, bakery, etc.<sup>6</sup>; they are represented as ‘other’ in the graph. In 2016, children saw, on average, 3.2 other HFSS ads per week (25.4% of all HFSS product ads seen by children) and 2.5 ads per week (26.5% of all HFSS product ads seen by children) in 2017.

<sup>6</sup> The ‘Other’ category consists of ads for bakery; deli; fish; groceries; ‘free from’ products; frozen; meat; ready meals; vegetables; fruit; ads which were identified as HFSS by TRP but fell within BARB categories that are not within the definition of food or drink; and ads in which no products were identified for NPM scoring but are treated as HFSS product ads for the purpose of the report (see footnote 4 on page 26).

The third largest proportion of HFSS product ads seen by children are ads for restaurants (including takeaways) that have the effect of promoting an HFSS product, with an average exposure of 2.1 ads per week (16.9% of all HFSS product ads seen by children) in 2016 and 1.9 ads per week (19.8% of all HFSS product ads seen by children) in 2017.

Ads for HFSS drinks (including soft/sports/energy/health drinks) and supermarkets ads that have the effect of promoting an HFSS product make up the smallest proportions of HFSS ads seen by children. The level of children's exposure to HFSS drinks ads was, on average, 0.4 ads per week (3% of all HFSS product ads seen by children) in 2016 and 0.2 ads per week (2.2% of all HFSS product ads seen by children) in 2017. Children saw an average of 0.1 supermarket ads that have the effect of promoting an HFSS product per week (0.4% of all HFSS product ads children saw) in 2016 and 0.02 ad per week (0.2% of all HFSS product ads seen by children) in 2017.

### Children's exposure as a percentage of exposure to all TV ads – HFSS product ads





In 2016, TV ads for HFSS products constituted, on average, 6.5% of all TV ads seen by children; that figure was 6% in 2017. The monthly breakdown indicates that the number of HFSS ads children seen by children ranged between 5.1% – 8.4% of all TV ads seen by them over the 12 months in 2016, and between 5.4% - 6.4% in the 12 months in 2017.

### **Indicators of longer term rates of exposure to TV ads for HFSS products**

The data on HFSS product ads presented in this report is limited to 2016 and 2017 because of inherent time and cost restraints associated with gathering data from previous years. This is arguably insufficient data to predict, with any degree of certainty, whether the decline in children's exposure to HFSS product ads, from an average of 12.4 ads per week in 2016 to 9.6 ads per week in 2017 will carry through to a further decline in 2018 (which we intend to report on in 2019).

However, between 2013 and 2017 children's exposure to all TV ads has declined, on average, by 8.3% each year (the lowest reduction was 2.2% from 2014-2015 and the highest reduction was 15.6% from 2016-2017). Children now see about three-quarters of the number of TV ads in the average week that they saw a decade ago (219.5 in 2008 vs 161.2 in 2017).

Over the same period (2013-2017), children's exposure to TV ads for all food and soft drinks has declined, on average, by 14% each year (the lowest reduction was 6.6% from 2014-2015 and the highest reduction was 19.1% from 2016-2017). Children now see half the number of food and soft drink ads in the average week that they saw a decade ago (36 in 2008 vs 19 in 2017).

In 2010, in its final review of the then, recently implemented, restrictions on TV ads for HFSS products, Ofcom provided some indications about the relative proportion of TV ads for HFSS and non-HFSS products<sup>7</sup>. It should be emphasised that Ofcom's review used a different methodology than that used in this report to classify HFSS products. However, it provides relevant contextual information to better understand the level of audience exposure to TV ads for HFSS products prior to 2016.

The findings of the review suggested that 58.9% of child impacts for TV ads for food and soft drink were for HFSS products and 41.1% for non-HFSS products. Exposure data from 2016 and 2017, presented in this report, suggests that gap has narrowed to 51.8% (HFSS) v 48.2% (non-HFSS).

---

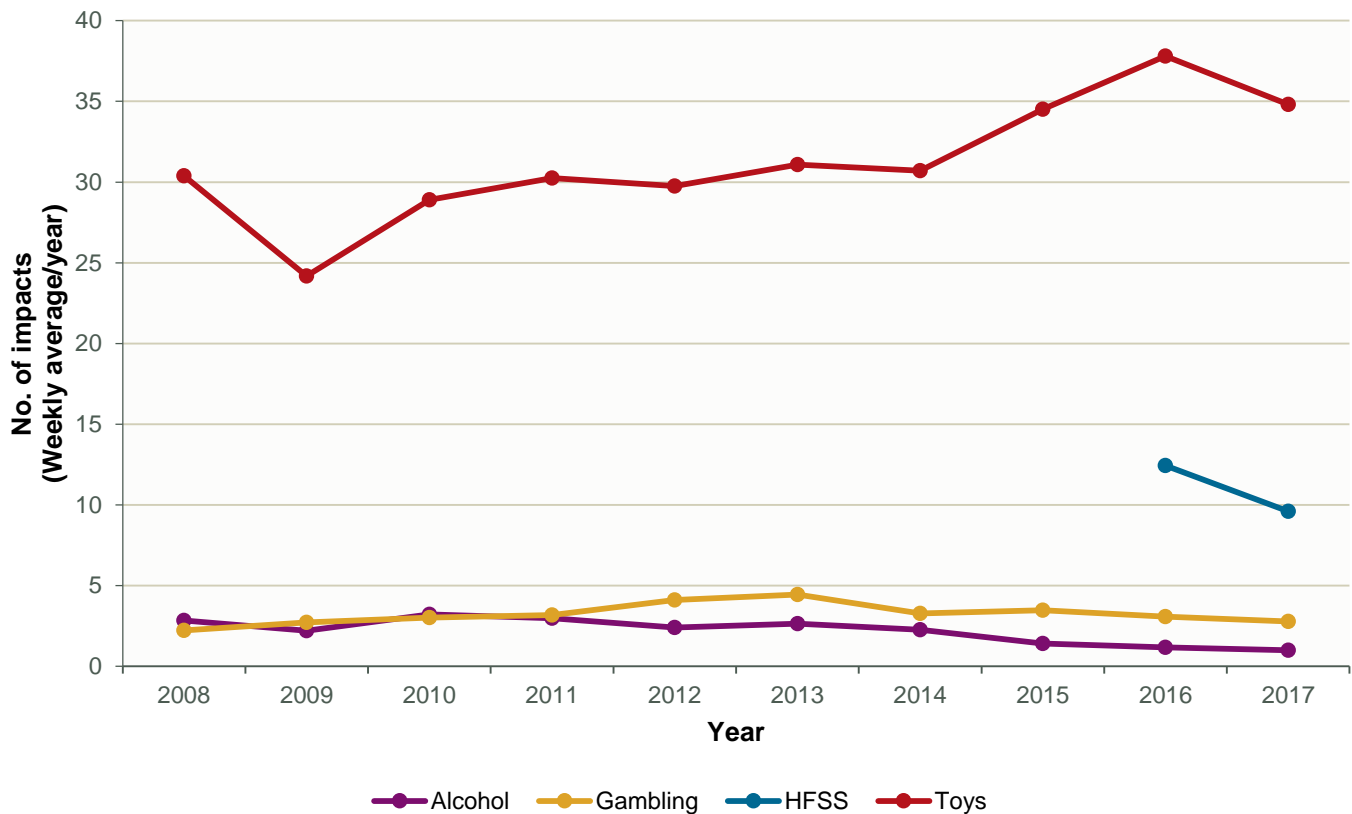
<sup>7</sup> [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0024/31857/hfss-review-final.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0024/31857/hfss-review-final.pdf) p. 32



## Children's exposure to TV ads: comparison with TV ads for toys

The following chart contrasts children's exposure to TV ads for toys with the categories of ads that are the subject of this report, and is provided for context.

Unlike TV ads for alcohol, gambling and HFSS products, TV ads for toys can be scheduled in or adjacent to children's programmes and programmes of particular appeal to them, in compliance with the rules in the UK Code of Broadcast Advertising.



Children's exposure to toy ads is significantly higher than their exposure to alcohol, gambling and HFSS product ads. This provides an indication of the high exposure levels that can be achieved when advertisers can legitimately and specifically target children.

## Q&A

### Why does BCAP think it appropriate for children to be exposed at all to ads for age-restricted products?

It must be recognised that age-restricted products, such as alcohol and gambling, are legally available and capable of being used and marketed responsibly, and are not legally prohibited from being advertised. Seeking to limit exposure absolutely is inherently premised on the notion that any exposure to an age-restricted ad, of itself, causes harm. To adopt the perspective that exposure equates to harm disregards the fact that these products are legally available in the consumer market and is contrary to the notion that content restrictions, which prohibit inappropriate / irresponsible appeal to children and young people, or encourage irresponsible use of such products, can form an effective part of the regulatory framework. BCAP does not consider that such a position is proportionate.

### Are there restrictions on the content of advertising?

As well as general rules about harm, offence, and misleadingness that apply to all advertising, the BCAP Code has additional content rules for many specific product sectors, including age-restricted products.

The content restrictions seek to ensure that, where children and young people are exposed to age-restricted advertising, the content of the ads does not promote irresponsible use. These rules mean that, although children and young people may see a limited number of age-restricted ads, the products are presented responsibly and do not appeal particularly to them.

Annex A at the end of this document lists the content rules for age-restricted products.

### What is the 120 Index and why is it set at this level?

If a particular age group has an audience index of 100, it means they are proportionally represented in relation to their share of the total TV audience; an index of 120 means they are over-represented by 20%. Programmes for which child audiences index at or above 120 are considered to have 'particular appeal' to that age group because a significantly higher proportion of the audience is made up of children.

The 120 index gives broadcasters the capacity to determine programmes likely to be of particular appeal to an audience of children and young people at any time of day and exclude age-restricted advertising from those programmes. BCAP considers that the 120 index describes an appropriate and proportionate limit because it represents a degree of age-based appeal that is robust enough to rely on as meaningful.

### Do BCAP and the ASA ever use time restrictions?

In some cases, BCAP and the ASA restrict certain ads (for any product, not just age-restricted ones) from appearing at specific times; this arises from the broader content of the ads, as opposed to their product category. For example, sexually suggestive advertising or ads containing violent or scary scenes may be prohibited from being shown before a certain time to prevent harm to children. In some instances, BCAP and the ASA take the view that the

content of an ad is sufficiently strong and its potential to distress younger children or otherwise harm them is sufficiently high to outweigh the right of adults to view the ad before a certain time.

### Is the scheduling policy open to change?

BCAP is committed to evidence-based policy making<sup>8</sup> and, where robust and objective evidence exists to suggest that a point of policy should be changed, will review the evidence and policy accordingly. This may include calls for evidence and public consultations, where appropriate. Like any policy, the position on scheduling is therefore open to change. Currently, we have not seen evidence to suggest that the combination of index-based scheduling and robust content rules, and the subsequent levels of exposure, are producing harmful outcomes or that a different approach would be more effective.

### Why does the report not use advertising spot data as a measure?

Advertising spots, as a measure, indicates the total number of individual ads. However, the number of spots does not necessarily correlate with the level of exposure. This is because advertisers or agencies buy ad space on TV based on the number of audience they wish to target, and the optimal number of times that they would like the target audience to see the ad. The broadcasters will then undertake to deliver the required audience performance through appropriate scheduling, whilst taking into account the requirements of the BCAP scheduling rules to ensure compliance. In most cases, the advertiser or agency is not directly involved in the placement of the TV ad within the schedule. Spots also do not fully account for regional transmissions (for example, the same ad broadcast in different regions) or transmissions on +1 or HD channels (the same ad is shown again on those channels in addition to the parent channel). In addition, one spot could be seen by, for example, 300,000 children, whereas 100 spots could be seen by none, depending on the channel, time of day and a number of other factors.

For those reasons, spots as a measure do not provide an indication of the advertisers' intent or the consequent audience exposure. Therefore, this report uses impacts as the preferred measure in looking at audience exposure to TV ads.

---

<sup>8</sup> <https://www.asa.org.uk/resource/evidence-based-policy-making.html>

## Contact us

Advertising Standards Authority  
Mid City Place, 71 High Holborn  
London WC1V 6QT

Telephone: 020 7492 2222

Textphone: 020 7242 8159

[www.asa.org.uk](http://www.asa.org.uk)

 Follow us: @ASA\_UK

## **Annex A: Rules restricting the content of TV ads for alcohol, gambling and HFSS products**

### **Alcohol**

19.2 Advertisements must not feature, imply, condone or encourage irresponsible or immoderate drinking. That applies to both the amount of drink and the way drinking is portrayed.

References to, or suggestions of, buying repeat rounds of alcoholic drinks are not acceptable. That does not prevent, for example, someone buying a drink for each member of a group. It does, however, prevent any suggestion that other members of the group will buy a round.

19.3 Advertisements must neither imply that alcohol can contribute to an individual's popularity or confidence nor imply that alcohol can enhance personal qualities.

19.4 Advertisements must not imply that drinking alcohol is a key component of social success or acceptance or that refusal is a sign of weakness. Advertisements must not imply that the success of a social occasion depends on the presence or consumption of alcohol.

19.5 Advertisements must not link alcohol with daring, toughness, aggression or unruly, irresponsible or antisocial behaviour.

19.6 Advertisements must not link alcohol with sexual activity, sexual success or seduction or imply that alcohol can enhance attractiveness. That does not preclude linking alcohol with romance or flirtation.

19.7 Advertisements must not portray alcohol as indispensable or as taking priority in life. Advertisements must not imply that drinking can overcome problems or that regular solitary drinking is acceptable.

19.8 Advertisements must not imply that alcohol has therapeutic qualities. Alcohol must not be portrayed as capable of changing mood, physical condition or behaviour or as a source of nourishment. Although they may refer to refreshment, advertisements must not imply that alcohol can improve any type of performance.

19.9 Advertisements must not link alcohol to illicit drugs.

19.10 Advertisements may give factual information about the alcoholic strength of a drink. They may also make a factual alcohol strength comparison with another product, but only when the comparison is with a higher-strength product of a similar beverage.

Advertisements must not imply that a drink may be preferred because of its alcohol content or intoxicating effect. There is an exception for low-alcohol drinks, which may be presented as preferable because of their low alcoholic strength.

In the case of a drink with relatively high alcoholic strength in relation to its category, the factual information should not be given undue emphasis.

19.11 Advertisements may include alcohol promotions but must not imply, condone or encourage immoderate drinking.

19.12 Advertisements must not feature alcohol being handled or served irresponsibly.

19.13 Advertisements must not link alcohol with the use of potentially dangerous machinery or driving.

Advertisements may feature sporting and other physical activities (subject to other rules in this section) but must not imply that those activities have been undertaken after the consumption of alcohol.

19.14 Advertisements must not normally show alcohol being drunk by anyone in their working environment.

19.15 Television only - Alcohol advertisements must not:

19.15.1 be likely to appeal strongly to people under 18, especially by reflecting or being associated with youth culture or showing adolescent or juvenile behaviour

19.15.2 include a person or character whose example is likely to be followed by those aged under 18 years or who has a strong appeal to those aged under 18.

19.17 Alcohol advertisements must not feature in a significant role anyone who is, or seems to be, under 25 and must not feature children.

An exception is made for advertisements that feature families socialising responsibly. Here, children may be included but they should have an incidental role only and anyone who seems to be under the age of 25 must be obviously not drinking alcohol.

19.18 Advertisements for alcoholic drinks may give factual statements about product contents, including comparisons, but must not make any health claims, which include fitness or weight-control claims.

The only permitted nutrition claims are "low alcohol", "reduced alcohol" and "reduced energy" and any claim likely to have the same meaning for the audience.

## **Gambling**

17.3 Advertisements must not:

17.3.1 portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm

17.3.2 suggest that gambling can provide an escape from personal, professional or educational problems such as loneliness or depression

17.3.3 suggest that gambling can be a solution to financial concerns, an alternative to employment or a way to achieve financial security

17.3.4 portray gambling as indispensable or as taking priority in life; for example, over family, friends or professional or educational commitments

17.3.5 suggest peer pressure to gamble or disparage abstention

17.3.6 suggest that gambling can enhance personal qualities; for example, that it can improve self-image or self-esteem, or is a way to gain control, superiority, recognition or admiration

17.3.7 link gambling to seduction, sexual success or enhanced attractiveness

17.3.8 portray gambling in a context of toughness or link it to resilience or recklessness

17.3.9 suggest gambling is a rite of passage

17.3.10 suggest that solitary gambling is preferable to social gambling.

17.4 Advertisements for gambling must not:

17.4.1 exploit cultural beliefs or traditions about gambling or luck

17.4.2 condone or encourage criminal or anti-social behaviour

17.4.3 condone or feature gambling in a working environment (an exception exists for licensed gambling premises)

17.4.4 exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of under-18s or other vulnerable persons

17.4.5 be likely to be of particular appeal to under-18s, especially by reflecting or being associated with youth culture

17.4.6 feature anyone who is, or seems to be, under 25 years old gambling or playing a significant role. No-one may behave in an adolescent, juvenile or loutish way.

17.5 Advertisements for family entertainment centres, travelling fairs, horse racecourses and dog racetracks, and for non-gambling leisure facilities that incidentally refer to separate gambling facilities as part of a list of facilities on, for example, a cruise ship, may include under-18s provided they are accompanied by an adult and are socialising responsibly in areas that the Gambling Act 2005 (as amended) does not restrict by age.

## **HFSS products**

13.9 Television only - Promotional offers must be used with a due sense of responsibility. They may not be used in HFSS product advertisements targeted directly at pre-school or primary school children.

13.9.1 Advertisements featuring a promotional offer linked to a food product of interest to children must avoid creating a sense of urgency or encouraging the purchase of an excessive quantity for irresponsible consumption



13.9.2 Advertisements must not seem to encourage children to eat or drink a product only to take advantage of a promotional offer: the product should be offered on its merits, with the offer as an added incentive. Advertisements featuring a promotional offer should ensure a significant presence for the product

13.9.3 Advertisements for collection-based promotions must not seem to urge children or their parents to buy excessive quantities of food. They must not directly encourage children only to collect promotional items, emphasise the number of items to be collected or create a sense of urgency. If a promotional offer can also be bought, that must be made clear. Closing dates for collection-based promotions must enable the whole set to be collected without having to buy excessive or irresponsible quantities of the product in a short time

13.9.4 Advertisements must not encourage children to eat more than they otherwise would.

The notion of excessive or irresponsible consumption relates to the frequency of consumption as well as the amount consumed.

13.10 Television only - Licensed characters and celebrities popular with children must be used with a due sense of responsibility. They may not be used in HFSS product advertisements targeted directly at pre-school or primary school children.

That 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.

13.11 Television only - No nutrition or health claim may be used in HFSS product advertisements targeted directly at pre-school or primary school children. For the avoidance of doubt, claims referring to children's development or health are acceptable in non-HFSS product advertisements, if those claims are authorised by the European Commission.

13.12 Television only - Although children might be expected to exercise some preference over the food they eat or drink, advertisements must be prepared with a due sense of responsibility and must not directly advise or ask children to buy or to ask their parents or other adults to make enquiries or purchases for them. (Please see rule 5.9 in Section 5: Children).

13.12.1 Nothing in an advertisement may seem to encourage children to pester or make a nuisance of themselves

13.12.2 Advertisements must not imply that children will be inferior to others, disloyal or will have let someone down, if they or their family do not buy, consume or use a product or service

13.12.3 Advertisements must neither try to sell to children by appealing to emotions such as pity, fear, loyalty or self-confidence nor suggest that having the advertised product somehow confers superiority, for example, making a child more confident, clever, popular or successful

13.12.4 Advertisements addressed to children must not urge children to buy or persuade others to buy and must avoid high-pressure or hard-sell techniques. Neither the words used nor the tone of the advertisement should suggest that young viewers could be bullied, cajoled or otherwise put under pressure to acquire the advertised item

13.12.5 If an advertisement for a children's product contains a price, the price must not be minimised by the use of words such as "only" or "just".

## **Annex B: Rules restricting the placement of age-restricted ads in non-broadcast media: a summary**

The UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (The CAP Code) prohibits age-restricted ads from being targeted at children and/or young people, including through the selection of the medium in which the ad appears. This includes a prohibition on such ads being placed in media that is aimed at these age groups (such as children's magazines) and any media where children and/or young people make up 25% or more of the audience.

To enforce this in practice, the ASA considers the characteristics of the specific medium in determining whether the placement of an ad is likely to breach this rule, for instance:

### **Online advertising and social media**

Most ads online, including in social media, are targeted at audience groups using known data (e.g. date of birth) and/or inferred data (e.g. web-browsing interests). Where this data obviously identifies members of the audience as children (aged 15 or younger) or a young person (aged 16 or 17), the CAP Code straightforwardly bans the targeting of ads for alcohol, gambling, HFSS and other age-restricted ads at them. CAP has produced a [guidance note](#) to help advertisers comply with this requirement.

For advertising appearing untargeted on a website, the measure of child audience share is generally considered to be that of the site itself. On a brand's social media channels, the share will be down to the age split of the brand channel, not the social media site as a whole. Where an ad can be targeted at a defined set of users, the relevant test under the Code is whether the ad was directed at people under 18; marketers should be able to demonstrate that they have taken reasonable steps to ensure that ads were directed at an audience that was aged 18 and over so as to minimise children's exposure to them.

For online ads that continue to be contextually targeted in much the same way as ads are contextually targeted in hard copy magazines, for example, the 25% test applies. The advertiser must consider the totality of information about the audience to demonstrate that no more than 25% of the audience are children and/or young people. This restriction applies to contextually placed age-restricted ads in advergames, social influencer videos, online apps, native ads and other online ad formats.

### **Outdoor media**

The CAP Code generally permits outdoor media to display ads for alcohol, gambling and HFSS product ads, subject to compliance with the strict content restrictions that prevent, for example, the content of the ad from appealing particularly to children and/or young persons. (Under 18s make up less than 25% of the population). In locations close to venues where children and young people are likely to be over-represented (such as schools), the ASA has ruled the placement of such ads to be in breach of the CAP Code.

### **Magazines and newspapers**

For publications, readership data is used where possible to determine whether more than 25% of readers are in the relevant age category. In general, however, many general interest

and news publications are unlikely to have a readership that is over-representative of children and young people.

### **Cinema advertising**

The majority of work in appropriate placement of cinema ads is undertaken by the Cinema Advertising Association, which pre-clears cinema ads. Using audience data from previous films, it advises on upcoming films likely to have a child audience share of more than 25% and before which age-restricted ads should therefore not appear.

## **Annex C: Process and methodology to generate data on TV ads for food and soft drink high in fat, salt or sugar (HFSS products)**

This annex, *Classification of High Fat, Sugar and Salt Food and Drink Advertisements: Methodology*, is published as a separate document on our website and can be accessed in our resources section.



# Classification of High Fat, Sugar, and Salt Food and Drink Advertisements: Methodology

October 2018



## Summary

TRP Research carried out a process of identifying and classifying all food and soft drink ads aired on any channel from 1 January 2016 to 31 December 2017. All ad spots in this period were identified, and non-food/drink advertisements were excluded by category and/or advertiser. The resultant list of food/drink spots were classed as potential HFSS advertising.

Where possible, the BARB advertiser and brand information was used to identify the product advertised. Where this was not possible, video logs were checked to verify both on-screen and audio product identification.

Using the list of identified products, the nutrient values for each was determined. Where it was available, Nielsen Brandbank nutritional data was used. Where it was not, the nutritional data was gathered from the advertiser's website. If no such data was available, a similar product was identified in McCance and Widdowson's The Composition of Food to produce an indicative nutritional composition.

Nutritional data was used to calculate Nutrient Profiling Model scores. Where an ad promoted multiple products, the highest scoring product was used to score the entire ad creative. Using the regulatory thresholds of 1 for drinks and 4 for foods, classifications of 'HFSS' or 'Non-HFSS' were applied. A third category of 'other' was used to identify advertisements where no product could be identified for scoring purposes.

Classification was further split, with '(NC)' added to any ad creatives that did not have a Clearcast code and that were not outside the scope of the Clearcast data provided, such as those ads that first aired before 1 January 2016 and those that only appeared on self-cleared channels.

## Identification of Food and Drink Promoting Spots

BARB Spot Data for all channels was extracted from TechEdge’s AdvantEdge system for the date range 1 January 2016 to 31 December 2017. This produced a master list of all ad creatives aired during the period.

BARB Film Codes were matched to the Clearcast output supplied by BCAP using the film code. Removing the ‘/’ from the Clearcast Clock Number provides an exact match to BARB film code.

| Advertiser           | Brand (TVEye)                      | Film Code     | Clearcast Clock Number | Clearcast advertiser               | Clearcast Code |
|----------------------|------------------------------------|---------------|------------------------|------------------------------------|----------------|
| LACTALIS UK          | MCLELLAND SERIOUSLY STRONG CHEDDAR | AEDLASS004020 | AED/LASS004/020        | MCLELLAND SERIOUSLY STRONG CHEDDAR | FH             |
| LACTALIS UK          | MCLELLAND SERIOUSLY STRONG CHEDDAR | AEDLASS005010 | AED/LASS005/010        | MCLELLAND SERIOUSLY STRONG CHEDDAR | FH             |
| BIRDS EYE            | BIRDS EYE FROZEN PEAS              | GRYBEWL001030 | GRY/BEWL001/030        | BIRDS EYE FROZEN PEAS              | FL             |
| BIRDS EYE            | BIRDS EYE FROZEN PEAS              | GRYBEWL007090 | GRY/BEWL007/090        | BIRDS EYE FROZEN PEAS              | FL             |
| GROCERY DELIVERY E S | HELLOFRESH.CO.UK                   | HLFHFO002030  | HLF/HFJO002/030        | HELLOFRESH.CO.UK                   | FH             |
| H J HEINZ COMPANY    | HEINZ BAKED BEANS                  | HOGHZBE083030 | HOG/HZBE083/030        | HEINZ BAKED BEANS                  | FL             |

Any film code that had a Clearcast FH/FL coding were automatically included in our master list. Spots that were not matched to Clearcast codes were reviewed to determine whether they should be considered as potential food or soft drink advertisements. To ensure a thorough master list of spots, spots were only excluded where there was certainty that no food or soft drink products would be advertised.

In order to do this, BARB categories were reviewed. Within each category, the Advertiser and Brand (BARB and TVEye) were checked to ensure that miscategorised spots could be reviewed for possible food content.

| Channel   | Date       | Start time | End time | Dur sec | Film Code     | Advertiser | Brand (TVEye) | Brand (BARB) | Major category | Mid category | Minor category |
|-----------|------------|------------|----------|---------|---------------|------------|---------------|--------------|----------------|--------------|----------------|
| PRIME TV  | 14/02/2016 | 23:24:04   | 23:24:33 | 30      | AMVMCGX835030 | MARS UK    | MARS GALAXY   | MARS GALAXY  | RETAIL         | HOUSEHOLD    | DIY STORES     |
| PRIME TV  | 14/02/2016 | 22:34:00   | 22:34:29 | 30      | AMVMCGX835030 | MARS UK    | MARS GALAXY   | MARS GALAXY  | RETAIL         | HOUSEHOLD    | DIY STORES     |
| HOME      | 11/02/2016 | 24:09:50   | 24:10:19 | 30      | AMVMCGX835030 | MARS UK    | MARS GALAXY   | MARS GALAXY  | RETAIL         | HOUSEHOLD    | DIY STORES     |
| FILM4     | 11/02/2016 | 23:24:01   | 23:24:30 | 30      | AMVMCGX835030 | MARS UK    | MARS GALAXY   | MARS GALAXY  | RETAIL         | HOUSEHOLD    | DIY STORES     |
| HOME      | 11/02/2016 | 21:49:37   | 21:50:06 | 30      | AMVMCGX835030 | MARS UK    | MARS GALAXY   | MARS GALAXY  | RETAIL         | HOUSEHOLD    | DIY STORES     |
| EDEN      | 11/02/2016 | 12:15:17   | 12:15:46 | 30      | AMVMCGX835030 | MARS UK    | MARS GALAXY   | MARS GALAXY  | RETAIL         | HOUSEHOLD    | DIY STORES     |
| HOME      | 11/02/2016 | 11:51:13   | 11:51:42 | 30      | AMVMCGX835030 | MARS UK    | MARS GALAXY   | MARS GALAXY  | RETAIL         | HOUSEHOLD    | DIY STORES     |
| BRIT ASIA | 14/02/2016 | 18:39:51   | 18:40:20 | 30      | AMVMCGX835030 | MARS UK    | MARS GALAXY   | MARS GALAXY  | RETAIL         | HOUSEHOLD    | DIY STORES     |
| VENUS TV  | 20/02/2016 | 24:56:10   | 24:56:39 | 30      | AMVMCGX835030 | MARS UK    | MARS GALAXY   | MARS GALAXY  | RETAIL         | HOUSEHOLD    | DIY STORES     |
| VENUS TV  | 20/02/2016 | 22:57:30   | 22:57:59 | 30      | AMVMCGX835030 | MARS UK    | MARS GALAXY   | MARS GALAXY  | RETAIL         | HOUSEHOLD    | DIY STORES     |
| EDEN+1    | 18/02/2016 | 23:27:03   | 23:27:32 | 30      | AMVMCGX835030 | MARS UK    | MARS GALAXY   | MARS GALAXY  | RETAIL         | HOUSEHOLD    | DIY STORES     |

*Example: Mars Galaxy ads were found under Retail: Household: DIY Stores*

At this stage, a policy of inclusion was followed. If an advertiser might sell food, the spot was included. Only if category and advertiser/brand were both not food/drink related would a spot be removed from the list.



The initial spot list included food, drink, and restaurant advertisers, as well as theme parks, gyms, cinemas, certain branded appliances (such as Tassimo and Nespresso coffee pod machines), and food-related toys.

## Product Identification

Product identification was handled in two stages. First, BARB advertiser and Brand data were reviewed to find spots with clearly identified products. Where a product was not identifiable from the BARB data, the spot was added to a list for review.

Using the film codes, each ad creative that required review was matched back to a transmission for which a recording was available. Where multiple recordings were available, by default the latest transmission was reviewed. TRP’s coding reviewers watched the creative, recording primary product(s) advertised, as well as any background products visible in the ad.

| Film Code     | Clearcast code | Example Channel | Recent Date | Example start | PRIMARY Product advertised 1        | PRIMARY Product advertised 2         | PRIMARY Product advertised 3 | PRIMARY Product advertised 4 | Background Product advertised 5                      | Back ground Product advertised 6 | Back ground Product advertised 7 | Back ground Product advertised 8 | Advertiser (BARB)    | Major category          | Mid category        | Minor category               |
|---------------|----------------|-----------------|-------------|---------------|-------------------------------------|--------------------------------------|------------------------------|------------------------------|--|----------------------------------|----------------------------------|----------------------------------|----------------------|-------------------------|---------------------|------------------------------|
| MIFMORR327010 | FH             | ITV             | 30/09/2017  | 12:02:29      | PRICE CRUNCH - VARIOUS FOODS        | READY BREAK                          | HOVIS BREAD                  | WARBURTONS ROLLS             | DAIRYLEA DUNKERS                                     | YOGHURTS                         |                                  |                                  | WILLIAM MORRISON SUP | FOOD                    | BAKERY              | CAKES & TREATS               |
| MEZCOS703030  | FH             | ITV             | 28/10/2016  | 16:12:07      | MCVITIES CARAMEL DIGESTIVE TEACAKES | CHOCOLATE HOBNOBS TEACAKES           | MCVITIES DIGESTIVE NIBBLES   | OREOS VARIETIES              |  |                                  |                                  |                                  | COSTCUTTER SUPERMARK | FOOD                    | FOOD BRAND BUILDING | FOOD - MULTI PRODUCT         |
| WPPHHUK063020 |                | E4              | 24/06/2017  | 12:09:16      | VARIOUS TAKE AWAY MEALS             |                                      |                              |                              | ALCOHOL  | ONION RINGS                      | CHICKEN WINGS                    | FRIES                            | HUNGRYHOUSE.COM      | ENTERTAINMENT & LEISURE | LEISURE ACTIVITIES  | RESTRS/CAFES/BI STROS        |
| AMVSYGG310020 | FH             | SKY 1           | 24/12/2016  | 07:12:03      | SAINSBURYS CHRISTMAS                |                                      |                              |                              | mince pies   | ham                              | jelly                            | champagne                        | SAINSBURYS SUPERMARK | FOOD                    | FOOD BRAND BUILDING | FOOD & DRINK - MULTI PRODUCT |
| KARICELLS1010 | FL             | SKY 1           | 05/11/2017  | 19:59:03      | ICELAND SLIMMING WORLD              | ICELAND 6 PACK WHITE RICE STEAM BAGS |                              |                              | mince pies curry shown but not specificall mentioned |                                  |                                  |                                  | ICELAND FROZEN FOODS | FOOD                    | FROZEN FOOD         | FROZEN READY MEALS           |

If no product was visible in the ad, the advertiser’s brand was recorded, such as ‘MCDONALDS - BRAND’ with a note about the creative and any campaign it may be linked to. If a particular sub-brand was being advertised (i.e., ‘MCDONALDS - MCCAFFEE BRAND’ vs ‘MCDONALDS - HAPPY MEAL BRAND’) this was recorded to allow for potential nutrient differences between sub-brands of a single advertiser.

Where reviewers found that the spot was not shown in the slot, a different recorded transmission was checked and the same coding process followed.

Reviewers also noted where an ad creative showed a large number of products, such as supermarket basket comparison ads. Any prominent products were recorded, with a list of other visible products. In some cases, it was not possible to identify all products in a basket. In these cases, visible products were selected in order to provide a range of NPM scores. If any presumed HFSS product was visible (i.e., confectionary, ice cream, biscuits), this has been recorded.



Supermarket ‘comparison shop’ and other ‘brand building’ ads where no products or product ranges are highlighted and any products in the ad are in the background were identified as Brand ads.

*Example: Tesco Clubcard promotion does not promote a particular product but food is visible throughout.*

Where a product range is particularly extensive, it was confirmed whether the whole range or a subset of that range was advertised. If it was not possible to identify what part of a range is advertised, the full range was NPM scored to get an inclusive view of the HFSS categorisation for the range. In most cases, it was found that all products within a range fell into the same classification.

Advertisements for fresh fruit, fresh vegetables, and unprepared meats were recorded without any brand identification, unless expressly given in the ad creative.

Ad creatives that only advertised alcohol products, including supermarket alcohol offers, were marked for exclusion from the final data set. For ad creatives that included both food/soft drinks and an alcoholic beverage as primary advertised products, both products have been recorded. NPM scoring has been applied to the food and soft drink products, with additional notation regarding the inclusion of alcohol in the creative.



*Example: Asda Mother's Day ad (Prosecco and Lindt Lindor chocolates)*

Where ad creatives are predominantly for food but feature background alcohol, the coding and NPM scoring for the food has been used.

Ads for food-related appliances such as Tassimo and Nespresso were included in the final data set if the ad creative was selling both the machines and the associated food products. Where only the machine was on offer, the ad creative was excluded. Where a particular sub-brand was being promoted, this sub-range has been used for the HFSS classification. Where the ad serves to promote the full range of available products, the full range has been used for the classification, deferring to the highest score for classification.



*Example: Bosch Tassimo coffee maker; John Adams Sprinkle Stix toy*

Other food-related products, such as ActiFry appliances and Sprinkle Stix toys, were excluded at this stage. Although they required and/or produced foods, the products advertised were not also advertising a particular brand of food.

## Nutrient Profile Model Scoring

With the product list derived in the previous stage, advertised products were matched to Nielsen Brandbank data, where available. Brandbank contained nutritional information for the majority of

branded products, but did not have many supermarket own-brand products. For these products, where available, nutritional data was taken from the supermarket's own website.

For restaurants, nutritional data was gathered from the restaurants' websites. If nutritional data was available per 100g, NPM scoring was carried out. Where nutritional data was only supplied by serving, the ad creative has been referred to BCAP for review.

Using this nutritional data, Nutrient Profile Model scores were derived. Where multiple varieties of a product were available or a full range was advertised, at least two varieties were selected for scoring. If scoring within a range produced a mix of HFSS and non-HFSS scores and it was confirmed that both HFSS and non-HFSS products were advertised, the ad creative was classed as HFSS.

### *Calculation notes*

For Fibre calculations, Brandbank data has been assumed to be AOAC Fibre, following the guidance provided in 'The 2018 review of the UK nutrient profiling model'.<sup>1</sup>

For fresh fruit, fresh vegetables and unprepared meats, nutrient data can be derived from the McCance and Widdowson's Composition of Foods Integrated Dataset (CoFID), as published by Public Health England,<sup>2</sup> and as referenced in the 2011 Nutrient Profiling Technical Guidance. The nearest record to the product coded by reviewers has been used, with the Food Code noted as a reference.

For products where Brandbank data lacked a sodium value, the calculation of (Salt (g) x 400) was used to derive the Sodium (mg) value. Similarly, where energy in kJ was not provided, the calculation of (Energy (kcal) x 4.184) was used to derive the Energy (kJ) value.

It was found that where Sodium was provided by Brandbank, this was predominantly in g. This was converted to mg for calculation. A check was performed to find any values to find products where Brandbank's Sodium data was provided in mg (as was the case with Coca-Cola products).

---

1

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/694145/Annex\\_A\\_the\\_2018\\_review\\_of\\_the\\_UK\\_nutrient\\_profiling\\_model.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/694145/Annex_A_the_2018_review_of_the_UK_nutrient_profiling_model.pdf), page 91

<sup>2</sup> <https://www.gov.uk/government/publications/composition-of-foods-integrated-dataset-cofid>

Where possible, differences between ‘as sold’ and ‘as prepared’ nutritional values have been identified. The Nutrient Profiling Technical Guidance (2011) was followed for products requiring reconstitution. This states that products requiring reconstitution before consumption should be calculated using ‘as prepared’ values. All other products should be calculated using ‘as sold’ values. Where the only one type of nutritional data available, this has been used as a default.

Where nutritional values were only available per 100 ml, a density value has been determined using similar products on Aqua Calc (<https://www.aqua-calc.com>). The density value has been included in NPM calculation sheets for reference.



For all products, a calculation was run to see if Fruit, Vegetable, and Nut (FVN) points would potentially change the classification (either through these points or, where the A score was 11 or above, where the FVN score would also allow for the inclusion of Protein points in the C score). For these products, percentages provided in ingredients lists were used to determine the FVN score.

*Example: Graze.com snack boxes benefitted from FVN scoring, as varieties include high percentages for dried fruit and nuts*

Brandbank product categories were not sufficient for determining food vs drink classification. For application of the NPM score threshold of drinks, anything in the Brandbank ‘Drinks’ category was classed as a drink. Additional categories were identified for other products that should be classed as drinks under the NPM scoring guidance (including a differentiation of yogurt drinks and drinking yogurts).

Included products fell into: Dairy & Bread: Milk & Cream; Dairy & Bread: Yoghurts; Baby: Baby Milks & Juices; Grocery: Hot Beverages; and Off Licence: Spirits & Liqueurs.<sup>3</sup>

<sup>3</sup> As clarification, the latter category included an incorrectly classified variety of Barr’s Irn-Bru; as per the project specifications, no alcohol products have been included in the NPM scoring or HFSS classification.

## Classification and Quality Checking

With scores calculated, ad creatives were classified as either HFSS or non-HFSS. Initial classification also included a separate ‘brand’ category where no particular product was advertised. Where there was sufficient product nutritional information to produce an NPM score, the ad creative was referred to BCAP for review. The suggested classification for these ads was HFSS by default, following the same guidelines currently used by Clearcast.

For most products, it was found that the TRP classification was in line with Clearcast. For ad creatives cleared as FL, an additional check was run to confirm that the identified product is in keeping with this score. For advertisers and brands with a range of HFSS and non-HFSS products, a check was run to confirm whether a non-HFSS product was advertised for the FL-coded creatives.

In cases where TRP classification disagreed with Clearcast’s FL coding, the spot was highlighted to BCAP for review. These included ad creatives for Heinz ketchup, Philadelphia cream cheese, John West No-Drain Infusions, and Frijj chocolate milkshakes.



*Examples: Heinz ketchup; John West Infusions; Alpro range*

As anticipated, a number of ads coded as FH by Clearcast were found to be ad creatives promoting a non-HFSS product or product range.

Additionally, 745 ads without Clearcast codes were identified as promoting food products. This is expected to be due to several reasons: first, clearance before 2016 (214 ad creatives); second,

channels not cleared by Clearcast (222 ad creatives); third, due to advertiser category or missing data. This final set was identified in data by adding '(NC)' to the TRP classification.



The (NC) creatives included supermarket Christmas ads where the foods were not directly identified, as well as brand building ads around food quality. These ad creatives were sent to BCAP for review. Where the ad was found to be predominantly brand-building it was excluded from the final data set.

*Example: Waitrose Free Range Egg guarantee ad had no Clearcast code*

A further 'sense check' was carried out to look for any 'red flag' products (confectionary, ice cream, sausages, etc.) that had been classified as non-HFSS. Ad creatives that had been classified as non-HFSS were also checked against coded lists of background products to ensure that there was not an overwhelming presence of HFSS foods behind a non-HFSS main product.

Where NPM scoring was not possible but a Clearcast code was available, a conservative approach was used and classification was matched to Clearcast's FH code. Where no Clearcast code was available and a product could not be verified for NPM scoring, the creative was coded as 'Other', with the understanding that this classification was to be included with HFSS for any analysis.