



AI-assisted collective ad regulation

The ASA's
2024-2028 strategy

Legal, decent, honest and truthful



AI-assisted, collective ad regulation

Our strategy at a glance

Who we are

We are the UK's independent frontline regulator of ads by legitimate businesses and other organisations in all media, including online. We are authoritative and influential on ad regulation; the centre of expertise.

Our purpose and ambition

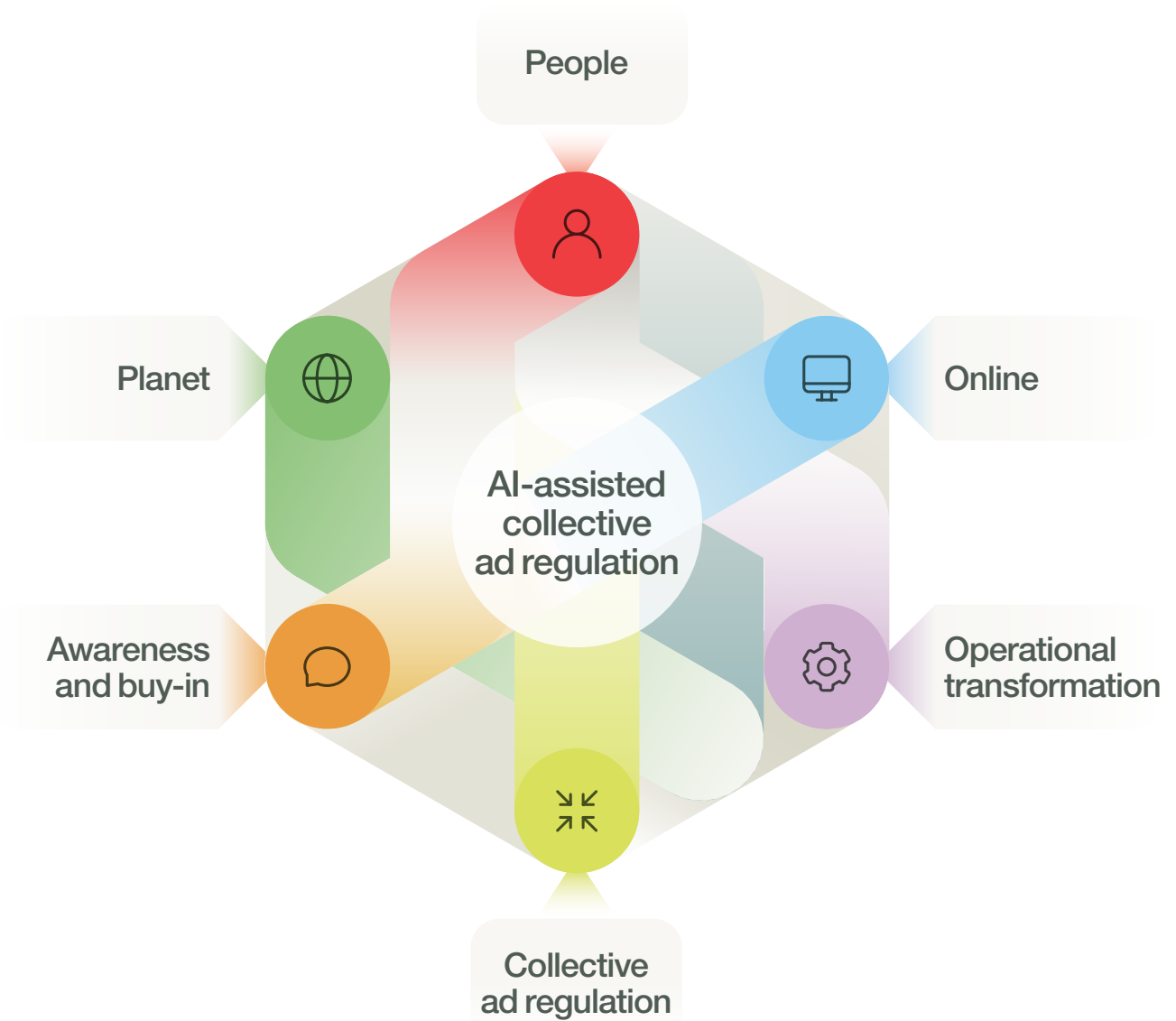
Our purpose is to make sure ads are responsible.
Our ambition is to make sure every UK ad is a responsible ad.

What we do is important

We are passionate about what we do because responsible ads are good for people, good for society and good for business.

How we regulate

We put people first and particularly focus on online ads. We use technology, including AI, to enhance our effectiveness and efficiency. We work with the advertising industry and other regulators too, delivering collective ad regulation.



The six strands of our strategy

1 > People

We will put people first and prioritise protecting vulnerable people. On matters of offence, we will prioritise only the most serious cases. We will take account of prevailing societal trends and beliefs to inform our regulation and ensure we represent everyone. And we will make sure we have the best people, recruiting, retaining and exploring more flexible working practices for people from both diverse backgrounds and a wider geographical area.

2 > Planet

We will run our *Climate change and the environment* project throughout the strategy period, as well as continuing to implement our own Net Zero plan.

3 > Online

We will continue to regulate all forms of online advertising that we cover, using our AI-based Active Ad Monitoring system to identify and swiftly act against irresponsible online ads, as well as provide more comprehensive reporting on compliance levels. We will champion how we think the regulatory framework should develop to help meet the challenges we face regulating online ads, bringing greater transparency and broader accountability. We will work closely with other statutory regulators whose remits overlap with ours and play our part in tackling fraud involving online ads. And we will be authoritative and influential in online ad regulation.

4 > Awareness and buy-in

We will be ambitious in increasing public and opinion-former awareness of, and trust in, the nature and extent of our ad regulation in all media. We will continue to make the case for collective ad regulation to the ad industry. And we will continue to invest in our data science capability, more people to address over-leanness in some areas and more people to act on data science insights.

5 > Collective ad regulation

We will continue to work with governments and statutory regulators, including to explore and as necessary address any material gaps in ad regulation. And we will, through our membership of EASA and ICAS, continue our engagement with supranational organisations and institutions.

6 > Operational transformation

We will prioritise proactive regulatory projects that adopt a 'whole system' approach on ad-related issues that cause the most detriment to people. We will resolve investigations quicker. And we will fully exploit data science, deploying mature capability and securing access to more ads and better data about them.

Who we are, our purpose and how we regulate

The ASA

We are the UK's independent frontline regulator of ads by legitimate businesses and other organisations in all media, including online. We are authoritative and influential on ad regulation; the centre of expertise.

The rules we administer and enforce are contained in the UK Advertising Codes, written by the industry Committees of Advertising Practice (CAP). To help maintain our independence from the industry that funds us, we are primarily funded at arm's length by the Advertising Standards Boards of Finance (Asbof).

Together, the ASA, CAP and Asbof make up the ASA system.

Our purpose, ambition and values

Our purpose is to make sure ads are responsible.

Our ambition is to make sure every UK ad is a responsible ad.

Our values are to be proactive, collaborative, accountable, transparent and decisive. We want external stakeholders to find us to be: independent in administering the Codes; evidence-based, proportionate, targeted and consistent; and reflective of society, not a social engineer.

What we do is important

We are passionate about what we do because responsible ads are good for people, good for society and good for business. They entertain and inform us, helping us to choose products and services. They fund the media, sport and culture we all enjoy. They can be a force for social good, encouraging us to contribute to good causes, make more responsible choices and stay safe. And they help deliver competition and power the economy.

By making sure ads are responsible, we protect people from being misled, harmed or offended, helping them feel more confident in the ads they see and hear.

How we regulate

We put people first. Protecting them from irresponsible ads sits at the heart of what we do.

We mainly focus on online ads. That is because: people, particularly children, spend so much time online; businesses advertise online more than anywhere else; our experience of regulating ads in all media tells us there are relatively more problems with online ads; and the online environment is vast, diverse, often subject to few or no media gatekeepers and is subject to rapid innovation. But we do not take our eye off the important task of making sure ads are responsible in other media too.

We use technology, particularly AI, to enhance our effectiveness and efficiency and we invest as much in preventative and proactive regulation as we do in reactive regulation. However, knowing what ads the public and others complain to us about remains important, as does acting on complaints that identify breaches of the Codes.

We have always worked with the wider advertising industry, which depends on trust in advertising. We strive to make sure advertisers play by the same rules, helping to create trusted media environments in which their responsible ads can flourish. We rely on their arm's-length funding, and the support, buy-in and, in some cases, funding of all parties involved in the preparation and publication of ads. We attach great importance to the benefits of working with a world class UK advertising industry, which supports the self-/co regulation independently administered by the ASA.

But that support is coupled with our robust and independent decision-making to ensure we deliver the best outcomes for people, who remain our priority. We are independent of the businesses who pay for what we do, independent of government and independent of special interest groups.

Our partnering with other regulators is crucial too. Our frontline ad regulation often complements their activities, or even frees them up entirely to concentrate on their other duties. And they are sometimes able to tackle ad-related problems that we cannot.

We call our model of partnering with businesses and other regulators 'collective ad regulation'. Our independence and the buy-in and support we receive through collective ad regulation delivers faster, more flexible, more joined-up and proportionate regulation.

AI-assisted, collective ad regulation



1 > People

Key drivers

1. People in the UK value the creativity, entertainment, social contribution and information provided by ads. But many of them also distrust ads, driven in particular by feeling bombarded and concerns about vulnerable groups, data privacy and misleading (including fraudulent) advertising. They have a broad definition of advertising, little sympathy for remit boundaries between regulators and high expectations that their problems should be resolved.
2. People are more likely to share similar views on the importance of tackling misleading and scam advertising, and protecting children and vulnerable people, than they are on more subjective (and sometimes socially divisive) issues like harm and offence.
3. People in the different nations and regions of the UK share many perspectives on ads, but their experiences, and the ads they see, hear and are influenced by, are not always the same.
4. Our own people, our employees, are our key asset. By recruiting and retaining talented and engaged people, equipping and treating them well, and by being an inclusive and diverse organisation, including in thought and protected characteristics, we will regulate better.

Strategic decisions

1. We will put people first. (And people potentially means anyone, not just those who complain to us.) Given people have little sympathy for remit boundaries between regulators and high expectations that their problems should be resolved, we will be their first port of call. The frontline regulator of UK ads, authoritative and influential on ad regulation and the centre of expertise.
2. We will prioritise protecting vulnerable people¹. Those will include children and financially vulnerable people, but we will also identify, and develop our understanding of other vulnerable groups, and people who are situationally vulnerable, who we will need to prioritise protecting, including by taking into account variations between the nations and regions. We will use various intelligence-gathering methods, including desk research, increased investment in public research and AI-assisted monitoring, to find out what ad-related issues are the most important for us to tackle and which vulnerable people need protecting. And we will identify additional robust external indicators of our positive impact.
3. With growing divisions in society, we will not be able to please everyone, for example on matters of harm and offence. We will review the thresholds for intervening against ads on grounds of offence, prioritising the most serious cases.
4. We will make sure we have the best people, which includes recruiting and retaining people, including our ASA Council members, from diverse backgrounds. We will pursue the highest levels of staff engagement and wellbeing and provide people with the skills, tools and support to succeed. We will explore how best to invite fresh input and insights, and take account of prevailing societal trends and beliefs, to inform our regulation and ensure we represent everyone. We will further improve our engagement with the UK nations and regions, for example through taking advantage of recruitment and flexible working practices to widen the geographical distribution of our workforce. And while our own use of technology will include looking for efficiencies, our focus will be on how better to enable our people to do their jobs well.

1. Vulnerability can derive both from membership of a particular group sharing certain characteristics (for example, children) or as a result of particular circumstances (for example, a recent bereavement or financial problem).



2 > Planet

Key drivers

1. Increasing concerns about the climate change emergency and the human impact on the environment have led the UK, Welsh and Northern Irish Governments to commit to net zero by 2050², with 78% of that reduction achieved by 2035, and the Scottish Government by 2045. Instead of UK advertising just being seen as part of the problem, it must be part of the solution to the UK achieving those targets.
2. When it comes to reducing greenhouse gas emissions, we must keep our own house in order.

Strategic decisions

1. We will run our *Climate change and the environment* project throughout the strategy period, including in partnership with the other regulators. We will continue to focus on misleading green claims, for example in advertising related to greener homes, given the potential for people to be misled as the UK transitions to net zero. We will deliver our regulation to support the rapid and lasting change towards more sustainable business needed, concentrating on the content and targeting of ads, given it is for Parliament to consider the arguments of those who campaign for sector-specific advertising bans.
2. We will continue to implement our own Net Zero plan, reducing our greenhouse gas emissions so we are net zero by 2030 at the latest. We will do that according to the necessarily high standards that we anticipate the UK and/or international expert bodies will develop in the coming years.

2. 2050 target = 100% reduction in greenhouse gas emissions compared to 1990. 2035 target = 78% reduction.



3 > Online

Key drivers

1. Online advertising is diverse. Not only are there differences in how paid ads are served on closed platforms that offer an integrated ad buying service and the open internet, but there are differences between paid ads and other categories of online advertising, particularly influencer advertising and businesses' own advertising claims on their own websites, apps and social media accounts. And the pace of innovation is fast.
2. People spend a lot of time online and businesses have followed them there, advertising online far more than anywhere else. While those businesses are primarily responsible for making sure their ads are responsible, UK society increasingly expects the platforms, intermediaries and publishers that make up the online advertising supply chain to play a greater role in helping to uphold the rules.
3. Our collective ad regulation approach is key to regulating online ads better. We cannot do it alone. Close partnerships with other regulators, with platforms and intermediaries, and with industry initiatives are key.
4. Fraud is the largest crime type, levels have grown in recent years and many frauds are now perpetrated, or facilitated in part, online, with texts, calls, emails and online social media platforms being among the most common forms of contact by fraudsters. The Government now acknowledges fraud as a national security threat.
5. Online advertising is evolving rapidly. The widescale adoption of connected TVs enables addressable advertising, which offers advertisers the ability to show different ads to different households. Such data-driven targeting is available, or expected soon, in other media too. Technological developments like generative AI promise great opportunities for society, but also carry great risks, including risks around advertising.
6. Concerns about data and privacy are driving action by data protection authorities. And the online advertising market is changing with the phasing out of the use of third-party cookies for targeting online ads, an issue that matters to some people, but which is of central importance to the online advertising supply chain.

Strategic decisions

1. We will continue to regulate all forms of online advertising that we cover. We will use our Active Ad Monitoring system to help us identify and swiftly act against irresponsible online ads, prioritising high priority areas that cause the most detriment, including influencer ads and inappropriate targeting. From that deployment of our AI capability, we will provide more comprehensive reporting on compliance levels in those areas and significantly increase the number of irresponsible online ads amended or withdrawn. And we will use, as appropriate, the full range of our industry sanctions and partnerships with statutory regulators to drive compliance.
2. We will complement that by championing, on the back of our world-first Intermediary and Platform Principles Pilot, how we think the regulatory framework should develop to help meet the challenges we face in regulating online ads, bringing greater transparency and broader accountability to that important area.
3. We will work closely with other statutory regulators whose remit overlap with ours to improve outcomes for people.
4. Acknowledging that fraudulent ads cause significant harm to people and adversely affect their perception of both advertising and the effectiveness of the regulatory system, we will continue to play our part in supporting appropriate enforcement authorities and businesses in the online advertising supply chain to tackle consumer fraud involving online ads. We will encourage businesses to adopt effective industry self-regulatory initiatives, for example those that seek to prevent fraudsters entering the online advertising supply chain.
5. We will be authoritative and influential in online ad regulation, including in relation to data-driven advertising and the opportunities and risks presented by generative AI.
6. We will work closely with the UK's data protection authority, the ICO, in areas where its regulation of data intersects with our regulation of advertising. And we will explore whether and how we can support data and privacy-related ad industry initiatives.



4 > Awareness and buy-in

Key drivers

1. Many people still do not know us or, if they do, do not know the nature and extent of our online ad regulation.
2. Many in the industry who should be familiar with us do not know us well enough, do not feel part of the ASA system in which they have a stake and do not use our advice and training services.
3. Although the UK ad industry continues to support and fund us, and our short-to-mid-term funding is secure, the percentage of our funding coming from online advertising must, in the long-term, broadly match the percentage of UK advertising spent online.

Strategic decisions

1. We will be ambitious in increasing public and opinion-former awareness of, and trust in, the nature and extent of our ad regulation in all media. We will do that through our day-to-day communications, through promoting the impact of our Active Ad Monitoring system in reporting on compliance levels and significantly increasing the number of irresponsible online ads amended or withdrawn, and by running our ASA ad campaign regularly throughout the strategy period. We will position ourselves as the frontline regulator of UK ads, influential on ad regulation and the centre of expertise. Our messaging will be more confident and authoritative, but more personal and relatable too.
2. We will increase industry awareness of, and trust in, our work, which helps maintain a level playing field by striving to make sure advertisers play by the same rules. We will position ourselves as above, but we will also stress the importance of (well-earned) trust in advertising and the vital role media owners can play by donating ad inventory to our ad campaign. We will better promote our advice and training services. We will prioritise the industry audiences we target, because it will be impractical to target them all, and we will explore charging or charging more for our events and training.
3. We will continue to make the case for effective collective ad regulation to the ad industry to support Asbof in putting our funding on a long-term sustainable basis, including working with Asbof to consider and find new channels of funding.



5 > Collective ad regulation

Key drivers

1. Governments and parliaments across the UK are increasingly willing to legislate in areas covered by us, in particular Less Healthy Food (LHF) ads and online paid ads.
2. Legislation from outside the UK, particularly from the EU, will continue to affect businesses operating in the UK and may therefore have implications for our regulation.

Strategic decisions

1. We will continue to make the case for effective collective ad regulation to politicians and officials, including through raising awareness of, and trust in, our role regulating online advertising, with our use of data science central to our strategy. We will position ourselves as the frontline regulator of UK ads, authoritative and influential, the centre of expertise and providing clear leadership on ad regulation matters.
2. We will continue to work with governments and statutory regulators to explore and as necessary address any material gaps in ad regulation, including potentially via co-regulation, stressing the importance of targeted and proportionate regulation that allows responsible advertising to thrive. We will work closely with Ofcom on ad regulation it contracts out or designates to us and provide expert insight on any advertising-related issues that fall under the Online Safety regime. We will continue to engage with the UK Government on its consideration of extending legislation to strengthen the regulation of online paid ads.
3. To help solve cross-border issues, share learning and stay close to the development of overseas regulation that might impact our regulation of ads by businesses and other organisations operating in the UK, we will, through our membership of EASA and ICAS, continue our engagement with supranational organisations and institutions. We will champion how we think the regulatory framework should develop to help meet the challenges ad regulators face in regulating ads online.



6 > Operational transformation

Key drivers

1. Proactive regulatory projects are often best for tackling sectoral or thematic ad compliance problems. Those projects increasingly adopt a 'whole-system' approach, where we: use a broad array of intelligence to prioritise ad-related issues, sometimes in partnership with other regulators and industry; use data science to identify candidate ads for investigation; publish rulings following those investigations to generate awareness of the issues and to help draw the line between what is, and is not, acceptable; produce guidance and/or circulate Enforcement Notices to the industry to further raise awareness of the issues; and use our Active Ad Monitoring system to check for compliance and enable follow-up enforcement.
2. Resolving investigations quicker, and preventing or removing obviously irresponsible ads, are important for protecting people and for maintaining a level playing field for advertisers.
3. Our ongoing digital transformation is key to keeping up with the range of regulatory issues people and businesses face. AI technology in particular is essential to us having visibility of the ads that people see and hear, enhancing our compliance activities and delivering efficiencies. If we are unable to source data and ads ourselves, getting data and ads from external providers, including as appropriate from platforms, will be central to that.
4. Our current and forecasted above-inflation investments in more people and new capabilities are key to our broader organisational transformation.

Strategic decisions

1. We will prioritise proactive regulatory projects, adopting a 'whole system' approach, on ad-related issues that cause the most detriment to people, focusing on protecting vulnerable people, on age-restricted ads in sectors like food, gambling and alcohol and on issues that are more specific to people in the nations and regions. We will ensure we invest more in our preventative/proactive work than our reactive complaints casework.
2. We will resolve investigations quicker. We will focus on preventing irresponsible ads appearing in the first place, where appropriate with the support of agencies, media owners, online ad supply businesses and others, and reporting on our success at that. We will deliver ongoing, agile and visible enforcement, in particular by removing irresponsible online ads quicker, including through enforcement mechanisms developed with platforms and intermediaries. We will explore how we use the ASA Council as efficiently as possible, focusing on the most important issues.
3. We will fully exploit data science, deploying mature in-house data science capability that gives us the confidence and the capacity to take on large strategic projects. We will have access to data and ads through our own systems and external providers, including as appropriate from platforms. Our external reputation as regulatory leaders in using data science will facilitate more partnerships with industry and other regulators.
4. We will continue to invest in: our data science capability; more people to address over-leanness in some areas and act on data science insights; and new capabilities, including any that come about from our championing how the regulatory framework should develop to help meet the challenges we face in regulating online ads. But we cannot rely on above-inflation funding every year: our strategy will help us allocate our finite resources, looking for efficiencies wherever we can.
5. We will aim to simplify our regulation where appropriate to deliver consistent and effective regulation across all media, including encouraging CAP to explore with stakeholders the strengths and weaknesses of maintaining the separate broadcast and non-broadcast UK Advertising Codes.

What success will look like



1 > People

As the frontline regulator of UK ads, we will be an easily accessible first port of call for people's ad-related concerns.

Delivering a sophisticated approach to identifying vulnerable people that has appropriate regard to the approaches of our consumer protection partners, prioritising their protection from irresponsible ads/ad targeting and providing robust external indicators of our positive impact.

And we will be a flexible, diverse employer, embracing hybrid-working and with greater employee representation in the nations and regions.



2 > Planet

We will continue to be a global leader in tackling misleading green claims and otherwise environmentally irresponsible ads.

Our work will demonstrate that ad regulation is making a meaningful difference to how businesses promote their environmental credentials, supporting the delivery of the UK's net zero and other environmental targets.

As an organisation we will meet our published emission-reduction targets, as assessed by an independent, expert third party.



3 > Online

Through our regulation of online ads, data science capabilities, championing our insights as to how the regulatory framework should develop to help meet the challenges we face in regulating online ads and our partnerships with statutory regulators, we will identify and take swifter action against more irresponsible online ads.

That will involve us processing far more than three million ads/potential ads (2023 estimate) through our Active Ad Monitoring system to help us identify and swiftly act against irresponsible online ads. From that deployment of our AI capability, we will provide more comprehensive reporting on compliance levels in the areas we monitor and report on significantly greater numbers of irresponsible online ads amended or withdrawn.

We will play our part in supporting the significant reduction in fraud targeted in the Government's National Fraud Strategy, including through our championing of effective industry self-regulatory initiatives that seek to prevent fraudsters entering the online advertising supply chain in the first place.

We will be authoritative and influential in online ad regulation, including data-driven advertising and generative AI.

And a partner of the ICO in regulating ad-related data and privacy issues.



4 > Awareness and buy-in

We will be widely known publicly and in the industry as the frontline regulator of UK ads, authoritative and influential on ad regulation and the centre of expertise, whose messaging is confident, authoritative, personal and relatable. Prompted public awareness of the ASA will be $\geq 70\%$, unprompted/spontaneous awareness of the ASA will be $\geq 20\%$, trust in the ASA will be $\geq 60\%$ and distrust in the ASA will be $\leq 6\%$.

Delivering high quality, targeted advice and training to the industry audiences that need it most.

With our funding secured on a long-term basis, potentially including from new funding channels and more income from charging for our own advice and training services.



5 > Collective ad regulation

Independent surveys we have commissioned will show us to be widely known by parliamentarians as the frontline regulator of UK ads, authoritative and influential on ad regulation and the centre of expertise, working with both industry and other regulators.

UK partner regulators will publicly acknowledge us to be a trusted frontline partner, including in any new co-regulatory frameworks.

And international stakeholder organisations will consider us a trusted partner too, engaging with supranational organisations, solving cross-border issues and championing through our membership of EASA and ICAS how the regulatory framework should develop to help meet the challenges we face in regulating online ads.



6 > Operational transformation

We will be an organisation that prioritises advice and training and proactive regulatory projects, investing more in preventative/proactive work than reactive complaints casework.

Resolving investigations, and taking down obviously irresponsible ads, quicker.

Stakeholder organisations will consider us to be a global leader in using data science to regulate better, including through large strategic projects. Data science will be integrated deeply into our processes, providing greatly enhanced visibility of online advertising.

It will allow us to select investigations from a larger pool of candidates, understand compliance levels more accurately and comprehensively, and effectively act against irresponsible online ads at scale in high priority areas.

Industry will consider that we have simplified our regulation where appropriate.