

ASA System briefing note on advertising to children

A note for policymakers



Background

The protection of children sits at the heart of our work and our rules. Our regulation recognises that children lack experience, are more credulous and are at greater risk of potential advertising related harm. Our focus is on ensuring no advertising contains anything that is likely to result in their physical, mental or moral harm.

For the purpose of the Advertising Codes, children are defined as those under 16 years old. However, the way in which children perceive and react to ads is influenced by their age, experience and the context in which the message is delivered. Ads should never assume that ‘children’ are a homogenous group as ads that are acceptable for young teenagers will not necessarily be acceptable for younger children.

Children begin to develop the ability to recognise advertising at a very young age. They have reasonably well-developed levels of critical understanding from the age of 8, and by the age of 12, children approach adult levels of critical understanding. All advertising needs to be obviously identifiable, so that when a child sees an ad, it should be obvious they’re looking at one. This can sometimes pose a challenge for advertisers when it comes to younger children, whose cognitive development is in its early stages. When ads are directed at under-12s, through the selection of media and/or the content, enhanced disclosure and ad labelling is **generally** required.

In an increasingly digital world, children are becoming more internet savvy at a younger age and we are seeing many children spending more time online. Although the opportunity for advertisers to engage with them is huge, so is the possibility to get it wrong. Children are unlikely to complain to the ASA about advertisements that they see online, which is why it is paramount that advertisers act responsibly and abide by the dedicated rules on children in the Advertising Code.

There is growing public concern about the potential mental and moral risks associated with children spending more time online. We know that increased online exposure raises the likelihood of encountering harmful content. For this reason, the Code includes strict rules designed to prevent advertising related harms linked to issues such as body image, eating disorders, cosmetic surgery abroad, and sexualisation—broader societal challenges to which children are particularly vulnerable.

Advertising rules

The advertising rules are designed to protect children from being misled, exploited or harmed. Read the rules on advertising to children [here](#).

In summary the rules state:

- Ads, especially those addressed to or depicting a child, must not condone or encourage an unsafe practice. Children must also not be shown in hazardous situations or behaving dangerously except to promote safety.
- Ads should be prepared responsibly and avoid containing content that is irresponsible and likely to cause distress to children or otherwise be offensive or unsuitable for them to see or hear.
- Ads addressed to, targeted directly at or featuring children must not exploit their credulity, loyalty, vulnerability or lack of experience.
- Ads must not portray or represent anyone who is, or seems to be, under 18 in a sexual way, unless the principal function of the ad is to promote the welfare of under-18s or to prevent harm (for example, in ads to promote safe sex).
- The CAP Code also protects children (under 16) and young people (16-17 years) through media placement restrictions for certain age restricted products. This includes:
 - Cosmetic interventions
 - Weight-reduction regimes or establishments
 - HFSS products
 - Gambling products, with some exceptions that are restricted to children under 16 only, as below
 - National Lottery products
 - Alcohol*
 - Alcohol alternatives*
 - Rolling papers or filters*
 - Electronic cigarettes*

Those marked with an asterisk (*) explicitly state that no medium may be used to advertise the relevant product if more than 25% of its audience is, or is likely to be, under 18.

Monitoring and enforcement

As part of our commitment to protecting children and young people from potential harms, we conduct regular monitoring of ads across media.

We've been using innovative techniques to proactively identify ads for age-restricted products that, against the advertising rules, are placed in children's media online, or served to children's social media accounts. Our studies include working with social media platforms popular with children and using avatars which act as proxies for their respective online audiences. See the annex for more information on CCTV style monitoring and child avatars.

We're harnessing tech, including using our in-house [Active Ad Monitoring system](#), an AI-based tool, to carry out world leading regulation in identifying at scale and speed potential problem ads for age-restricted products targeted at children or inadvertently placed in children's media against our rules.



We also report on children's exposure to age-restricted TV ads, such as ads for alcohol and gambling products, at the UK level with data going back to 2010. We use the reporting to help identify trends and ensure our tough scheduling restrictions are working to limit children's exposure to them.

Key rulings

Diesel (London) Ltd (2021): Two online display ads [for](#) the clothing retailer Diesel were banned for including overtly sexual imagery in an untargeted medium where they could be seen by children.

Mondelez (2022): A video on demand ad for Dairy Lea [was](#) banned for encouraging children to eat while hanging upside down, which is unsafe behaviour that could be dangerous for children to emulate.

PrettyLittleThing.com (2022): Images on a fast-fashion retailer's website [featuring](#) Alabama Barker were socially irresponsible and likely to cause harm and offence by depicting an under 18 in a sexual manner.

Burger King (2024): Three email [ads](#) promoted meals with HFSS products and were directed at children through the selection of media or context in which they appeared.

Erdem Clinic (2024): Four [posts](#) on Millie Bracewell's TikTok account were not obviously identifiable as ads, trivialised the decision to undergo cosmetic surgery and were directed at under-18s through the context they appeared in.

Belle Baby Ltd (2025): An [ad](#) on the retailer's website portrayed the child wearing a swimsuit in a sexual way.

Zara (2025): Four product listings [on](#) the Zara website featured models who appeared unhealthily thin.

Pheon Inc (2025): An in-game [ad](#) and a paid-for social media ad for an AI Chat Bot, portrayed the character as under-18 and was likely to cause serious or widespread offence by stereotyping women as sexual objects.

Gorgeous Shard Puzzle Studio (2025): An in-game [ad](#) for the mobile game app Gorgeous Shard Puzzle Studio featured a sexualised and objectified woman, which was offensive and promoted a harmful gender stereotype.

Annex

Children's Exposure to Age Restricted TV Ads: 2024 Update

The [latest report](#) indicates that children's exposure to gambling and alcohol ads on TV continues to decrease, and provides figures for children's exposure to HFSS products for the first time [since 2019](#).

Key findings include:

- Between 2010 and 2023, children's exposure to alcohol advertising on TV decreased by four fifths

- Under-16s exposure to gambling ads on TV decreased by two fifths since 2010
- Exposure to HFSS product ads on TV decreased by two thirds since 2016

The findings of this report show that children are seeing fewer ads for gambling, alcohol, and HFSS products on TV, in a continuing downward trend, but it also highlights that children's exposure to all TV ads is also decreasing; between 2010 and 2023, children's exposure to all TV ads fell by three quarters.

Online Supply Pathway of Age-restricted Ads (2024)

We know, of course, that a lot of the continued decline in children's exposure to TV ads is down to changing media habits, which is why we are also continuing to conduct proactive project work looking at what ads they are seeing online.

The ASA [published](#) a report providing a unique insight into the online supply pathway of ads for alcohol, gambling and other age-restricted ads. The findings of this report shine a light on the several steps and procedures that the advertising industry follows to ensure age-restricted ads are directed away from children.

- Over the three-month monitoring period, there were 82,657 instances when ads were served to these avatars. 133 instances only - or 0.16% of the total - related to ads for alcohol, gambling or other age-restricted ads mistargeted to a child or neutral avatar, in breach of the advertising rules.
- Of these, just 50, relating to 12 advertisers (0.06%), were mistargeted to a child online profile. Two related to food products high in fat, salt or sugar; six for gambling; two for weight-loss products or treatments; two for e-cigarette products, and none for alcohol.

100 Children Report (2022)

The [ASA's 100 Children Report](#) provides a fascinating insight into UK children's real-world mobile phone and tablet use, the platforms and sites they visit and the ads they're exposed to over the course of one week. The ASA conducted ground breaking research into:

- The ads children and young people were served online and on social media
- The number of alcohol, gambling and other age restricted ads they were served
- If those registered as over 18 on social media were more likely to be exposed to age restricted ads

Key headlines from the report can be found [here](#).

Child Avatars

We [call](#) on advertisers to use media and audience targeting tools to direct their ads away from the minority child audience for age-restricted ads. To gain an insight into whether this is happening in practice, we use online avatars as proxies for child and adult audiences and monitor the ads they receive.

CCTV- style monitoring

We use CCTV-style monitoring to identify the small number of ads for alcohol, gambling and high fat, and salt or sugar foods that break the rules online. We train our cameras on 49 websites and 12 YouTube channels with a disproportionately high child/under 18 audience.