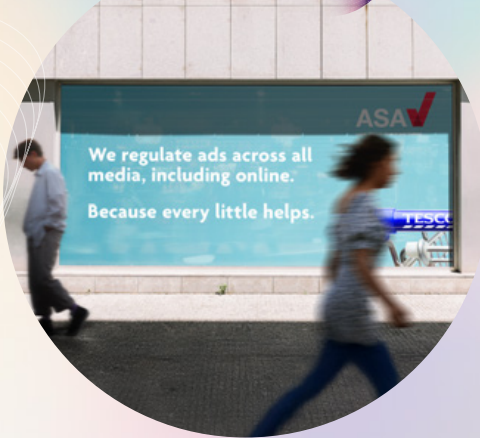
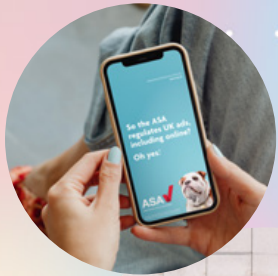


2025  
ASA & CAP  
Annual Report





# The ASA and CAP work together to make ads responsible.

We do this by taking action against misleading, harmful or offensive advertising and ensuring compliance across all sectors.



## The Advertising Standards Authority

is the UK's independent regulator of advertising across all media.



## The Committees of Advertising Practice

write the UK Advertising Codes and provide authoritative guidance on the rules.

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A WORD FROM THE ASA CHAIR

# Self- and co-regulation in an era of rising expectations

2025 marked my first full year as ASA Chair, and it offered many opportunities for me to see our regulatory system fully in action.

We operate in a landscape where calls to 'ban' or 'regulate' advertising continue to grow. Whether these calls come from Parliament, Government or the public, our response is to consider whether and how such regulation might work in practice.

## RIISING EXPECTATIONS IN ONLINE REGULATION

Harmful online content continues to be a significant focus. CAP's rules on avoiding sexual objectification and harmful gender stereotypes are clear, but we now see these rules being challenged, for example, by in-app adverts that are often easily accessible to children. The advertising of weight-loss prescription-only medicines is another issue that has escalated dramatically as the use of such medicines becomes more common.

## THE STRENGTH OF THE UK'S REGULATORY MODEL

So, having a self- and co-regulatory system that is agile, able to address emerging harms, and capable of working effectively with other regulators is critical if we want people to be protected and ads to be trusted. At the same time, we recognise that advertising revenue underpins the financial stability of much of our media and many other businesses, so ensuring our approach is proportionate, transparent and focused is vital.

## RECOGNISING THOSE WHO UPHOLD THE SYSTEM

I would like to thank my fellow ASA Council members for their diligence and determination in fulfilling their regulatory and governance roles.

We were saddened to learn of the death of our long-serving Independent Reviewer, Sir Hayden Phillips, whose 15 years of service made a lasting contribution to the integrity and independence of the ASA's regulatory system. We were grateful to our Interim Independent Reviewer, Rachel Childs, for her thoughtful approach during the period after Sir Hayden's retirement. We now welcome our new Independent Reviewer, Sarah Munby, and look forward to working with her.

Finally, I would like to thank the whole ASA team, under the engaged and effective leadership of Guy Parker, for their work in ensuring that both the advertising referred to us, as well as the advertisements we proactively monitored, are legal, decent, honest and truthful.

In a year of rising public expectations, agile and joined-up regulation has never mattered more.



**Nicky Morgan**  
The Rt Hon the Baroness  
Morgan of Cotes  
ASA Chair



# Keeping ads responsible

In 2025, 22,383 ads were amended or removed as a result of our work.

## Proactive

Nearly  
**60 million**  
online ads were scanned by our Active Ad Monitoring system ...

... providing insights into  
**36**  
proactive regulatory projects

## Reactive

We resolved over  
**40,000**  
advertising complaints  
*(overwhelmingly from the public)*

about  
**25,397** ads

## Outcome

The amendment or removal of  
**22,383** ads



A WORD FROM THE CAP CHAIR

# Trust is what makes advertising work

What is advertising if it's not trusted? Just noise. Distracting, probably unwelcome, and of little value to audience or advertiser.

## SAFEGUARDING STANDARDS IN ADVERTISING

The reason CAP exists, why the UK advertising industry created it in 1961, and with it the ASA as its judiciary and police force, is to ensure that our advertising can be trusted. That ads are trustworthy messengers carrying trustworthy messages. Based on a Code that constrains ads to be legal (of course), decent (by the standards of the day), honest and truthful (the critical qualities for trustworthiness).

## KEEPING PACE WITH CHANGE

65 years later, that remains true. CAP and BCAP's work in 2025 covered its usual gamut of categories and issues, from food to fertility clinics, e-cigarettes to eco-claims, seeking to help advertisers, agencies and media owners make advertising that is clear, honest and responsible.

Sometimes this work is driven by changes to the law, as with the less healthy food rules and guidance, or results from the Digital Markets, Competition and Consumers Act. Sometimes it is in harness with the statutory regulators who backstop the ASA's role, like the Gambling Commission or Medicines and Healthcare products Regulatory Agency. Sometimes it is in response to market developments, such as our consideration of the impact of AI on advertising – an emerging picture.

## TRUSTED ADVERTISING BENEFITS EVERYONE

But in all cases, whether expressed as rules, guidance, copy advice or insight articles, CAP's goal is to enable the industry that backs it to produce trustworthy advertising. The benefits to consumers are evident: ads whose claims and promises can be relied upon; price and product information that can be acted upon with confidence. The benefits to responsible advertisers are equally potent: a fair competitive environment and confidence that audiences will trust, and therefore respond to, advertising that appeals to them.

Those direct commercial benefits mean that the industry remains committed to rules that it is collectively responsible for and will abide by and enforce the ASA's administration of those rules. This review shows how many challenges our self-regulatory system faced in 2025; that it has emerged so strongly is thanks to the skill of its people and to the need for trust in advertising that gives CAP its role and the ASA its foundations.

Trust is vital for advertising; CAP is vital to ensuring that trust.



James Best, CBE  
CAP Chair



# Helping businesses get their ads right first time

In 2025, CAP delivered 596,039 pieces of advice and training to businesses across the UK.

Most accessed our online guidance, covering everything from alcohol to weight loss claims.

There were also:

**58,264**

reads of CAP Insight newsletters

**4,729**

people attended CAP training and other events

**4,343**

bespoke queries answered by our Copy Advice team



A WORD FROM THE ASA CHIEF EXECUTIVE

## Leading the next era of ad regulation

The ASA system is a lean and effective regulator of ads in all UK media, particularly online. We have transformed in recent years to become a primarily proactive and preventative regulator.

In 2012, we spent 5% of our regulatory resource on proactive work and 67% on reactive complaints casework. By the end of 2025, that had shifted to 45% on proactive work and 38% on reactive complaints casework. There is room for further rebalancing, but our reactive complaints casework remains vital for various reasons; we must not cut too far or too fast.

### USING AI AT SCALE TO TARGET HARMFUL ADVERTISING

We are the global leader among ad regulators in using AI to deliver our regulation, in 2025 scanning 60 million online ads through our AI-driven Active Ad Monitoring system. Almost all our proactive regulatory projects used the system last year, as well as drawing on human experts across the ASA system to target ad-related issues, mostly online, that can cause significant detriment to people, particularly children and other vulnerable groups. Think issues like alcohol ads, gambling ads, medical claims, unauthorised investment claims, influencer disclosure, weight-loss injections and other prescription-only medicine ads, cosmetic surgery ads, pricing in ads and green claims.

### STRENGTHENING ACCOUNTABILITY THROUGH PLATFORMS

The intensive legal, policy and stakeholder work around less healthy food advertising was a major priority for us in 2025. With the industry, we continued our pioneering work developing the Intermediary and Platform Principles framework, engaging a wider group of social media and demand-side platforms in the promotion and enforcement of our Code. In 2026, we anticipate formalising the framework delivering even greater transparency and accountability to online ad regulation.

### SECURING A SUSTAINABLE FUNDING MODEL

With the pace of technological and societal change, our transformation will continue throughout the next three years of our *AI-assisted, collective ad regulation* strategy, and beyond. Asbof, our funding board, is focused on future-proofing our funding model in light of the major changes in the advertising ecosystem in recent years.

The ad industry, including the platforms, cannot take for granted their stake in their own regulation through the self- and co-regulatory ASA system. In 2026, we are uniting to solve this funding challenge.

## The future of ad regulation depends on innovation, accountability and sustainable funding.



**Guy Parker**  
ASA Chief Executive



# AI and the ads we regulate

AI continued to be a key focus for the ASA system in 2025 – our adoption continues to grow, and it is also changing the advertising landscape we regulate.

## AI-ENABLED REGULATION, HUMAN-LED JUDGEMENT

We continued to develop our Active Ad Monitoring system (AAMs), which uses AI to proactively monitor online ads. Last year, the system processed nearly 60 million ads and generated vital intelligence on key topics including climate claims, weight-loss injections and cosmetic surgery. The scope and complexity of our proactive monitoring continue to expand, strengthening the effectiveness of our regulation – as illustrated in Nicky Baker’s article on alcohol advertising.

We are also using AI more widely to assist our work. These tools now help speed up the formal investigation process, and further trials are planned in 2026. AI tools cannot replace many of the subtle and subjective judgements our teams have to make, but we believe they can help our experts spend their time where it’s most valuable.

## SETTING CLEAR EXPECTATIONS FOR RESPONSIBLE USE OF AI IN ADS

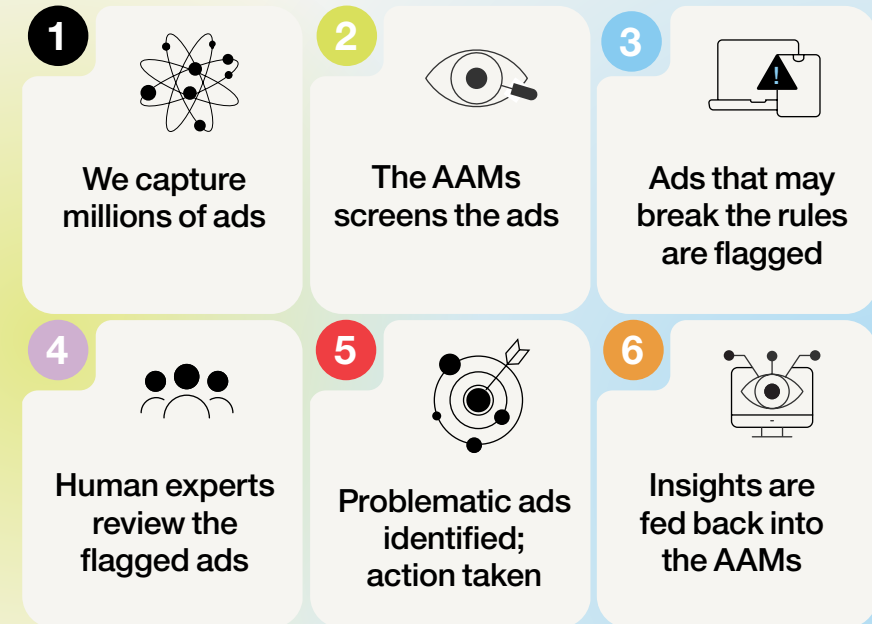
AI is also driving rapid change in advertising. Generative AI is making content creation more efficient, enabling greater volumes of increasingly personalised ads. CAP continues to support the responsible use of AI in ads, including through our media-neutral rules that hold all ads to the same high standards. The ASA also assessed a growing number of complaints involving AI-generated advertising content in 2025.

## APPLYING THE CODES TO EMERGING AI PRODUCTS

Finally, AI is enabling new types of consumer products, and we are considering how consumers interpret claims about the capabilities of AI in advertising, and whether there is potential for harm in some cases.

AI will continue to develop and be adopted rapidly in 2026. As well as taking advantage of new technology in our regulatory work, the ASA system will continue to apply the Codes fully to all ads in the UK, including ads made with AI, ads for AI and ads placed in AI-based products.

## HOW THE ACTIVE AD MONITORING SYSTEM WORKS



**Adam Davison**  
Director of Data Science, ASA



# The Alcohol Pulse Report: AI-assisted monitoring in practice

Alcohol advertising is a highly sensitive sector, attracting sustained public and policy scrutiny. The Alcohol Pulse Report is a practical application of the ASA's targeted monitoring, showing how we use AI to strengthen the regulation of online advertising in areas that matter to the public.

The report sets out the findings of an ambitious ASA trial using large language models to assess online alcohol ads against all the alcohol rules.

## HOW WE MONITORED THE ALCOHOL ADS

Using the ASA's Active Ad Monitoring system, we collected nearly 6,000 paid-for ads, all the alcohol ads the system could capture, shown to UK consumers in early 2025. These ads appeared across social media, search and display advertising, and included promotions for alcoholic drinks, alcohol-free alternatives, and alcohol-related products and venues.

The system scanned and categorised the ads quickly and consistently. ASA experts then reviewed any ads flagged as potentially problematic. This approach allowed us to look beyond individual complaints and see what consumers are actually being shown online, including ads that may not trigger complaints but still raise potential concerns.

## FINDINGS

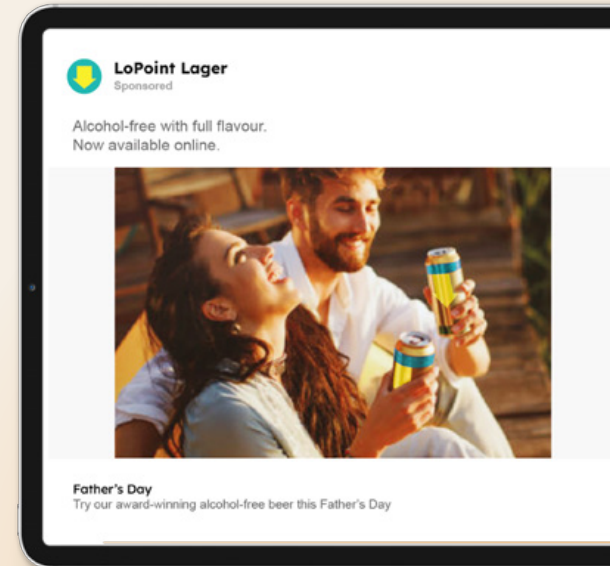
Overall compliance was high: 96% of ads appeared to comply with the rules on alcohol advertising.

Only a small number of potential issues were identified. These were usually specific and limited, such as how clearly some alcohol-free products were labelled, allowing the ASA to take targeted and proportionate follow-up action.

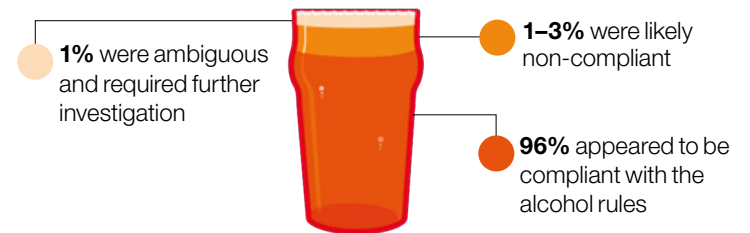
## WHAT HAPPENS NEXT

The Alcohol Pulse Report marks an important step in how the ASA uses AI to support its regulatory work. The ASA will continue to invest in proactive, AI-assisted monitoring and plans to run similar studies in other areas of public and policy interest, including gambling and less healthy food advertising.

The report found that 48% of alcohol-free ads assessed raised potential compliance issues. As this mocked-up ad shows, many didn't include clear ABV information – important for consumers who want to avoid alcohol.



## ALCOHOL AD COMPLIANCE RATE FINDINGS



**Nicky Baker**  
Regulatory Projects Manager,  
ASA



# Insight, action and protections for vulnerable people

Protecting vulnerable people has always been central to the ASA's work. We ensure ads do not mislead, harm or offend, and recognise that vulnerability can arise from belonging to a group that shares certain characteristics, such as children, or from personal circumstances including bereavement, health issues or financial pressures.

## CHALLENGING HOW OLDER PEOPLE ARE PORTRAYED

In 2025, we deepened our understanding of vulnerability by commissioning research into how older people are portrayed in advertising. The findings revealed a clear gap between older people's lived experiences and how they are represented in ads and wider media. We shared these insights with industry and continue to apply the learnings when assessing ads featuring older people.

## STRENGTHENING PROTECTIONS THROUGH REGULATION

We also strengthened protections through updates to the Advertising Codes, aligning them with the Digital Markets, Competition and Consumers Act 2024. While the changes benefit all consumers, they provide important additional safeguards for people who may be financially vulnerable, have limited digital literacy, live with disabilities, or are more susceptible to pressure or harm.

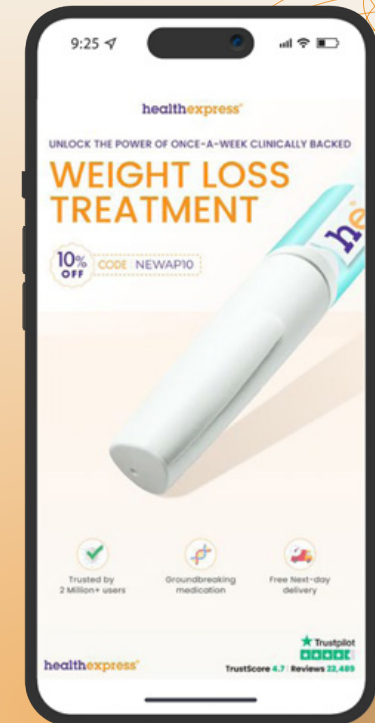
## TARGETED ACTION IN HIGH-RISK AREAS

We took decisive action to protect vulnerable audiences from harmful ads for prescription-only weight-loss medicines (POMs). Using intelligence from our Active Ad Monitoring system, we launched proactive investigations, delivered precedent-setting rulings and worked with healthcare regulators to ensure compliance. These rulings clarified that all injectable weight-loss treatments are POMs and cannot be advertised to the public, even where the product is not named. They also established that phrases such as "weight-loss injections" and imagery of injection devices can constitute references to POMs.

We further addressed financial vulnerability through investigations into accident-management ads, seasonal credit promotions that risked encouraging irresponsible spending and group-action compensation schemes linked to data breaches and diesel emissions.

## LOOKING AHEAD

Looking ahead to 2026, we will continue to proactively protect vulnerable people and respond to new and emerging risks in the advertising landscape.



We banned this HealthExpress.co.uk ad in July 2025 as part of precedent-setting rulings on prescription-only weight-loss medicines. The partial image of an injection pen, references to a "once-a-week" treatment and a 10% discount promoted a POM to the public.



**Jo Poots**  
Head of Complaints and  
Investigations, ASA

# From Instagram to TikTok: Tracking progress in influencer ad disclosure

In May 2025, we published our second Influencer Ad Disclosure report. Building on the findings of our 2021 study, the report expanded its scope beyond Instagram to include TikTok.

## MONITORING INFLUENCER COMPLIANCE

Using our Active Ad Monitoring system, we captured 50,000 pieces of content from 509 UK-based accounts representing 390 individual influencers during the monitoring period. Our expert team checked a sample of the flagged ads and assessed compliance with the ad rules.

## EVIDENCE OF PROGRESS BUT FURTHER ACTION IS NEEDED

Approximately 57% of influencer advertisements complied with the disclosure rules – a clear improvement on the 35% compliance we recorded in 2021. A further 9% of the content included some form of disclosure but used unclear labels. However, 34% of reviewed posts included no disclosure at all, showing that influencers, brands, agencies and platforms have more work to do to ensure all the ads users see on social media are clearly labelled.

More than half of all the ads promoted products and services within the travel and fashion sectors, where rates of non-compliance were higher. This intelligence helped inform our decision to conduct a shorter, more focused piece of work on ad disclosure among travel influencers in 2026.

## GAINING ADDITIONAL INSIGHT WITH NEW CONSUMER RESEARCH

Recognising how rapidly social media platforms and influencer marketing have evolved since our first labelling research in 2019, we commissioned new consumer research in 2025 to better understand how easily users identify influencer advertising.

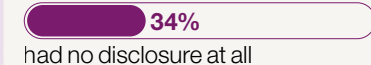
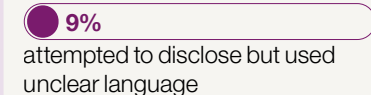
The findings echoed our earlier results, reinforcing that clear, upfront labels – such as “Ad” – and the use of platform-specific disclosure tools remain the most effective ways for signalling commercial content.

These insights show that our rules and guidance remain appropriate for the current digital landscape. They inform the ASA and CAP’s ongoing engagement with influencers, brands, agencies and platforms, ensuring that our existing rules and guidance continue to be applied and communicated effectively as advertising practices, digital platforms and consumer behaviour evolve.

We analysed over 50,000 pieces of content across Instagram and TikTok.



## Of the influencer ads we saw



**Victoria Bugler**  
Operations Manager –  
Compliance, CAP



# The space between greenwashing and greenhushing is bigger than you think

In 2025, our work continued to cover a broad range of interventions on green claims. This included working with the Competition and Markets Authority on areas of mutual interest, such as claims for greener home technologies (for example, solar power) and sustainability claims in the fashion sector.

But alongside the enforcement activity for which we're well known, we also work hard to help businesses get their claims right first time.

## WHY GREENWASHING AND GREENHUSHING AREN'T THE ONLY OPTIONS

One of the key anxieties we heard is whether businesses face a Hobson's choice between "greenwashing" on the one hand or "greenhushing" on the other.

We've always been clear that the space between these two extremes is far wider than people assume. The choice has never been between making misleading green claims or simply saying nothing.

Instead, the choice is between accuracy and inaccuracy, between making hard-to-prove, absolute claims or safer, conditional claims and between having good evidence to back your claim up or insufficient evidence.

## HELPING BUSINESSES MAKE ACCURATE, EVIDENCE-BASED CLAIMS

Some of our decisions in 2025, such as those concerning Shell and Barclays, have shown that even if a business is involved in high-carbon activities or the financing of high-carbon business, there is space to make engaging, compliant claims as long as you follow key principles.

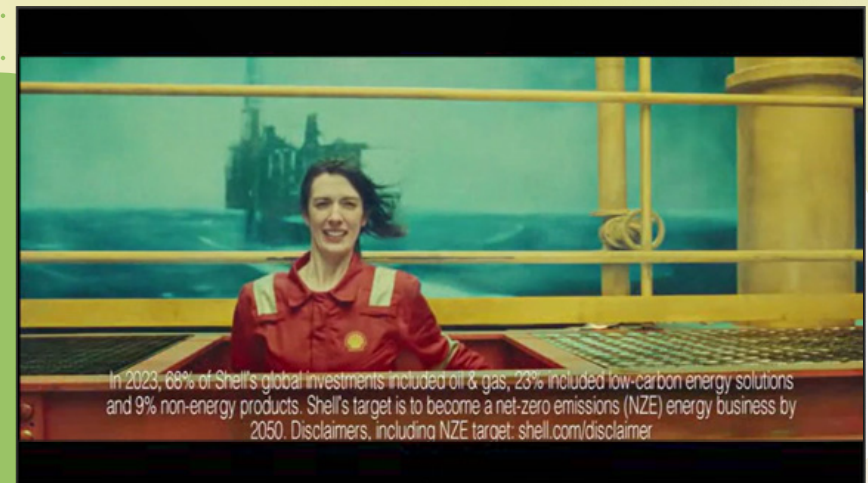
Whether you're a big or small business, and whatever your environmental footprint, we have a wealth of advice and training available to help you navigate green claims, including guidance, e-learning and bespoke copy advice services for non-broadcast claims. So, if you're in doubt, get the help you need.



**Miles Lockwood**  
Director of Complaints and Investigations, ASA



We did not uphold complaints because this ad was clearly a B2B ad for advisory services, not a claim about Barclays' wider carbon footprint.



We did not uphold complaints about this Shell UK ad, as it balanced references to lower carbon initiatives with clear context about continued oil and gas investment.

In 2023, 68% of Shell's global investments included oil & gas, 23% included low-carbon energy solutions and 9% non-energy products. Shell's target is to become a net-zero emissions (NZE) energy business by 2050. Disclaimers, including NZE target: [shell.com/disclaimer](https://shell.com/disclaimer)

# Implementing the less healthy food and drink advertising rules



**Shahriar Coupal**  
Director, Committees of Advertising Practice

## RESPONDING TO LEGAL AND POLICY COMPLEXITY

In 2025, the ASA and CAP’s work to implement new restrictions on less healthy food and drink ads took place against an unusually complex legal and policy backdrop. CAP had consulted on guidance to support the incoming rules but re-consulted early in the year after legal advice highlighted that the legislation did not clearly exempt brand advertising, as intended by successive governments. In the absence of legal certainty, CAP concluded that a more cautious regulatory approach was necessary.

## CLARIFYING SCOPE AND TIMING

Subsequent ministerial statements clarified the Government’s policy intention that brand advertising should fall outside the scope of the restrictions, alongside a commitment to legislate to remove ambiguity and a decision to delay the start of the regime until January 2026. CAP therefore paused its consultation, resuming work once the draft statutory instrument was published.

## PUBLISHING GUIDANCE AND SUPPORTING IMPLEMENTATION

Over the summer, CAP developed revised draft guidance at pace, consulting on and evaluating responses in a short timeframe. This required an exceptional collective effort across teams to ensure the final framework was legally robust, proportionate and practical for advertisers to apply.

The work culminated in December 2025 with the publication of comprehensive advertising guidance, setting out how the ASA is likely to interpret and apply the new rules in practice. CAP and BCAP issued a regulatory statement, formally approved by the ASA and Ofcom, confirming post-consultation arrangements for administering the restrictions and signposting further “secondary advice” materials.

Alongside publication, the ASA and CAP delivered major presentations to industry, attracting well over a thousand participants, and ran multiple outreach events to support key stakeholders’ understanding of the rules. This extensive engagement reflects our commitment to effective implementation, regulatory certainty and helping advertisers prepare ahead of the January 2026 start date.

## LESS HEALTHY FOOD (LHF) RULES AT A GLANCE

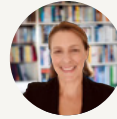
Visit our website for the [full guidance](#).

<div style="background-color: #f0f0f0; padding: 10px; border-radius: 15px;"> <p><b>1</b> <b>WHAT THE RULES COVER</b></p> <p>The new rules apply to ads for identifiable less healthy food and drink products – meaning products that are high in fat, salt or sugar (HFSS) that also fall within certain product categories set out in law.</p> </div>	<div style="background-color: #f0f0f0; padding: 10px; border-radius: 15px;"> <p><b>2</b> <b>WHAT COUNTS AS “IDENTIFIABLE”</b></p> <p>Where people in the UK can reasonably be expected to identify an ad as being for a less healthy product or products.</p> </div>	<div style="background-color: #f0f0f0; padding: 10px; border-radius: 15px;"> <p><b>3</b> <b>WHERE ADS ARE RESTRICTED</b></p> <ul style="list-style-type: none"> <li>– Online: Paid-for ads for identifiable LHF products are not allowed at all.</li> <li>– TV and on-demand services: Ads for identifiable LHF products cannot be shown between 5:30am and 9:00pm.</li> </ul> </div>	<div style="background-color: #f0f0f0; padding: 10px; border-radius: 15px;"> <p><b>4</b> <b>KEY EXEMPTIONS</b></p> <ul style="list-style-type: none"> <li>– Brand advertising: ads that do not depict a specific identifiable less healthy product are allowed.</li> <li>– Small and medium-sized businesses: ads for businesses with fewer than 250 employees are exempt.</li> </ul> </div>	<div style="background-color: #f0f0f0; padding: 10px; border-radius: 15px;"> <p><b>5</b> <b>OTHER RULES STILL APPLY</b></p> <p>Even where the new restrictions do not apply, ads for HFSS products must still follow existing advertising rules on content and placement, including HFSS-specific rules.</p> </div>
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## Find out more online

You can find the following information on our website by clicking the titles below.



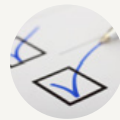
### INDEPENDENT REVIEWER'S REPORT

Rachel Childs, the interim Independent Reviewer of ASA Council Rulings, reports on cases she reviewed in 2025.



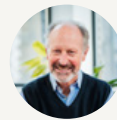
### ADVERTISING ADVISORY COMMITTEE REPORT

The Advertising Advisory Committee (AAC) advises from the consumer perspective on potential updates to UK advertising rules. Sam Younger, CBE, AAC Chair, reports on the Committee's 2025 activity.



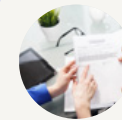
### PERFORMANCE AGAINST OUR 2025 OBJECTIVES

Information on the ASA's 2025 objectives and key performance indicators.



### CAP PANELS

Read about the Industry Advisory Panel and the Promotional Marketing and Direct Response Panel, and the advice they provided in 2025.



### 2025 COMPLAINTS AND CASES IN CONTEXT

Find out how complaints and cases break down by media, sector, issue, outcome and UK nation.



### ASA COUNCIL

Read about the Council members who decide whether an ad has broken the rules and operate as the ASA board.



### COMMITTEES OF ADVERTISING PRACTICE

Find out about the marketing industry trade bodies and other member organisations that make up the Committees of Advertising Practice.



### FINANCIAL REPORT

Read our 2025 Financial report, which includes information about our accounts and future plans. This will be available from 20 May, after our accounts are published.



**Advertising Standards Authority**

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37 – 45 Paul Street  
London EC2A 4LS

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



**Committees of Advertising Practice**

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London EC2A 4LS

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