

Review of More Impact Online table

The table below contains a small number of changes to our More Impact Online Strategy following Council discussion at the July Strategy Session and September Council meeting. We will communicate the changes to staff, CAP, BCAP and (B)asbof and then publish our updated Strategy on our website, with minimal fanfare given the changes do not fundamentally change our strategic direction of travel.

Item	Change	Rationale	Status
Title			
Corporate Strategy 2019-2023: More Impact Online	Change to “The ASA’s 2019-2023 strategy: More Impact Online”	We don’t use the word “corporate” anymore	Approved
Strategy on a page			
Purpose and ambition: Our purpose is to make advertisements responsible and our ambition is to make every UK ad a responsible ad	No change		Approved
What we do is important: We’re passionate about what we do because responsible advertisements are good for people, society and businesses	No change		Approved
How we regulate: We regulate ads wherever they appear. It’s right for us to focus on online ads because businesses increasingly advertise online, people are spending more time online and the pace of change online contributes to concerns, but we won’t take our eye off the important task of making sure ads are responsible in other media too. Resolving complaints will continue to be vital to our work, but so will continuing our proactive regulation	No change		Approved

<p>1. People: We will put people first, which means everyone not just people who complain to us. We'll be open to listening in new ways and we'll continue to improve our engagement with the UK nations and regions</p>	<p>Change to "1. People and the planet: We will put people first. People means everyone, not just those who complain to us. We'll explore the role advertising regulation can play in responding to the climate emergency. We'll be open to listening and collaborating in new ways. And we'll continue to improve our engagement with the UK nations and regions"</p>	<p>Strategy needs to cover the environment Better home for engagement with supra-national bodies point Convey crisis/emergency Convey collaboration</p>	<p>Approved</p>
<p>2. Online: We will improve our regulation of online advertising. We'll continue to focus on misleading content and inappropriate targeting, but we'll also be open to thinking beyond that, for example seeking to work more closely with the large online platforms so we help each other to protect people from irresponsible ads. We'll develop our thought-leadership in online ad regulation</p>	<p>Change to "...for example working more closely both with the large online platforms so we help each other to protect people from irresponsible ads and with the government and Ofcom, both on Video Sharing Platform advertising regulation and to address any gaps in online advertising regulation, including potentially via co-regulation. We'll raise awareness of, and develop our thought-leadership in, online ad regulation"</p>	<p>Strategy needs to acknowledge more specifically VSP and possibly other online advertising co-regulation More emphasis on raising awareness of online ad regulation</p>	<p>Approved</p>
<p>3. Effectiveness: We will deliver high quality, proactive regulatory projects on ads that cause the most detriment to people. We'll prioritise better, explore using machine learning to improve our regulation, look to act more nimbly and simplify our regulation where we can</p>	<p>Change to: "...We'll prioritise better, explore use machine learning to improve our regulation, look to act more nimbly, simplify and make more efficient our regulation where we can ..."</p>	<p>We are already using machine learning Strategy needs to cover efficiency</p>	<p>Approved</p>
<p>4. Buy-in: We'll seek greater buy-in from online-only advertisers, retailers, brands, micro- and SME businesses and the social influencer community, by highlighting the benefits of our regulation and being open to regulating differently</p>	<p>Change to: "Buy-in: We will work closely with key stakeholders to put our funding on a sustainable basis. We'll see greater buy-in from..."</p>	<p>More emphasis on responding to our funding challenge</p>	<p>Approved</p>

<p>5. Enforcement: We will improve how we proactively identify and remove irresponsible ads (particularly online) and our sanctioning of non-compliant advertisers</p>	<p>No change</p>		<p>Approved</p>
<p>6. Independence: We will continue to regulate without fear or favour, taking account of the evidence-base at all times. We'll continue to demonstrate the effectiveness of our regulation – including in response to challenges to TV and online ad regulation – through our actions and our communication, and we'll be open-minded to change that strengthens the ASA system</p>	<p>No change</p>		<p>Approved</p>
<p>1. People</p>	<p>Change to “People and the planet”</p>	<p>Strategy needs to cover the environment</p>	<p>Approved</p>
<p>Key drivers</p>			
<p>1.1 In common with the general decline of trust in public institutions, people’s trust in and favourability towards advertising are low. Their expectations of businesses and regulators are rising</p>	<p>No change</p>		<p>Approved</p>
<p>1.2 There have always been differences in society, but what divides us seems starker than before: urban v rural; nations and regions v London and the South East; social liberals v social conservatives; state-controlled v free market; Brexiters v Remainers</p>	<p>No change</p>		<p>Approved</p>
	<p>Introduce new key driver: “1.3 Increasing concerns about the climate change emergency and the human impact on the environment have led the UK government to commit to net</p>	<p>Strategy needs to cover the environment Convey crisis/emergency Refer to Scottish target</p>	<p>Approved</p>

	zero by 2050 and the Scottish government by 2045”		
	Introduce new key driver based on old 3.8 below: “1.4 The UK is set to has left the EU while the world is still responding to the coronavirus pandemic, but globalisation will continue despite the increase in protectionist policies”	Better home for Brexit (and coronavirus) key driver Change tense	Approved
	Introduce new key driver based on old 3.1: “1.5 Our own people, our committed employees, are our most valuable asset. Their skills and experience are essential to working towards our ambition. And being a diverse and inclusive organisation is an important way of ensuring we reflect and represent the people of the UK”	Better home for staff-related key driver	Approved
Strategic decisions			
1.3 We will put people first, which means everyone and not just people who complain to us. Consumers and citizens; city and countryside dwellers; all nations and regions; children and, in particular, the vulnerable	Renumber 1.6		Approved
1.4 We will continue to pay close attention to the public we hear from every day, but we’ll be open to listening in new ways, including using research, data-driven intelligence gathering and machine learning – our own or that of others – to find out what advertising-related issues are the most important for us to tackle. But with growing divisions in society, we won’t be able to please everyone, or protect	Renumber 1.7. Change to: “...but we’ll be open to listening and collaborating in new ways, including using research, data-driven intelligence gathering and machine learning – our own or that of others – to find out what advertising-related issues are the most important for us to tackle. But With growing divisions in society we won’t be able	Strategy to reference explicitly protecting those with protected characteristics from harm Add reference to collaboration	Approved

<p>people from ever being offended. Our greater engagement across Scotland, Wales and Northern Ireland has been well-received. We will deepen it further to ensure we understand and value the views of all UK people</p>	<p>to please everyone, or protect people from ever being offended, but we will strive in particular to keep those with protected characteristics from harm. Our greater...”</p>		
	<p>Introduce new strategic decision: “1.8 We will explore the role that advertising regulation can play in responding to the climate change emergency and environmental challenge, and we will set and report on targets to reduce our own carbon footprint”</p>	<p>Strategy needs to cover the environment Convey emergency/crisis</p>	<p>Approved</p>
	<p>Introduce new strategic decision based on old 3.15 below: “1.9 To get better at solving cross-border issues, we will continue our engagement with supranational organisations and institutions, including through our membership of the European Advertising Standards Alliance (EASA) and the International Council for Ad Self-regulation (ICAS)”</p>	<p>Better home for Brexit (and coronavirus) strategic decision</p>	<p>Approved</p>
	<p>Introduce new strategic decision based on old 3.9: “1.10 We will make sure we recruit and retain the best people, which includes people from diverse backgrounds, so we can reflect and represent the people of the UK. We will ensure their skills and experience are supported by our better use of technology”</p>	<p>Better home for staff-related strategic decision</p>	<p>Approved</p>
<p>2. Online</p>			
<p>Key drivers</p>			

<p>2.1 People think online is a wild west, including advertising online. That contributes heavily to the undermining of trust in and favourability towards advertising and, potentially, our regulation</p>	<p>Change to: “2.1 People think online is a wild west, including advertising online. That contributes heavily to the undermining of trust in and favourability towards advertising and, potentially, our regulation. New audio-visual media law and possible other new UK law will change the way audio-visual media are online advertising is regulated”</p>	<p>Strategy needs to acknowledge more specifically VSP and possibly other online advertising co-regulation</p>	<p>Approved</p>
<p>2.2 Regulating online better means being, and being seen to be, at the forefront of and thought-leaders in online ad regulation</p>	<p>No change</p>		<p>Approved</p>
<p>2.3 Many people don’t know we regulate online advertising, in particular companies’ and organisations’ own advertising claims on their own websites and social media spaces (online ‘advertiser-owned’ advertising)</p>	<p>Change to: “...in particular companies’ and organisations’ own advertising claims on their own websites and social media spaces (online ‘advertiser-owned’ advertising website advertising claims)</p>	<p>We don’t use the term “online ‘advertiser-owned’ advertising” anymore</p>	<p>Approved</p>
<p>2.4 In the coming years, data and privacy will move even further out of the shadows and into the light of what matters to people, even if many people continue to be careless with their personal data despite professing concern</p>	<p>No change</p>		<p>Approved</p>
<p>Strategic decisions</p>			
<p>2.5 We will further strengthen our online regulation to play our part in addressing well-founded concerns about internet content. We will continue to focus on inappropriate targeting and misleading content (including time-pressure tactics, dynamic pricing, clickbait/tabloid cloaking, fake celebrity endorsements and inadequate labelling of native/ influencer/affiliate advertising). But we will</p>	<p>Change to: “...We will continue to focus on inappropriate targeting and misleading content (including time-pressure tactics, dynamic pricing, clickbait/tabloid cloaking, fake celebrity endorsements, and inadequate labelling of native/ influencer/affiliate advertising and other newly emerging technologies/techniques). But we will</p>	<p>We are working with the platforms Strategy needs to acknowledge more specifically VSP and possibly other online advertising co-regulation Allude to other newly emerging technologies</p>	<p>Approved</p>

also be open to thinking beyond that, for example seeking to work more closely with the large online platforms, so we help each other protect people from irresponsible ads (see 4) and monitoring social media chatter about irresponsible ads	also be open to thinking beyond that. For example: seeking to working more closely with the large online platforms, including holding them to greater account for the part they play in helping to deliver socially responsible advertising; and working with the government and Ofcom, both on Video Sharing Platform advertising regulation and to address any gaps in online advertising regulation, including potentially via co-regulation”		
2.6 We will develop our thought-leadership in online ad regulation, including on advertising content and targeting issues relating to areas like voice, facial recognition, machine-generated personalised content and biometrics	No change		Approved
2.7 We will raise awareness of our online regulation, to the public, politicians, the media, opinion-formers, the ad industry and micro- and SME businesses (where we will seek the help of the large online platforms to reach their advertisers)	No change		Approved
2.8 Working with others, in particular the Information Commissioner’s Office, we will play a meaningful part in the regulation of the use of data for data-driven marketing	No change		Approved
3. Effectiveness			
Key drivers			
3.1 Our own people, our committed employees, are our most valuable asset. Their skills and experience are essential to working towards our ambition. And being a diverse and inclusive organisation is an	Move to new 1.5	Better fix with People and the planet strand	Approved

important way of ensuring we reflect and represent the people of the UK			
3.2 Our greater proactivity under our 2014-18 strategy has had an impact, has been well received and is necessary for us to keep up with the range of regulatory issues people and businesses face. But we can't keep adding to our workload: our new strategy needs to help us allocate our scarce resources, acknowledging that not all demands are equal	Change to: "3.2 Our greater proactivity under our 2014-18 strategy has had an impact, has been well received and is necessary for us to keep up with the range of regulatory issues people and businesses face. But we can't keep adding to our workload: our new strategy needs to help us allocate our scarce resources, acknowledging that not all demands are equal "	Superfluous reference to old strategy "Our new strategy needs to..." gets into strategic decision territory, and is covered in new 3.9 below	Approved
3.3 Complaint case levels will continue to be unpredictable and our awareness-raising work, particularly of our role regulating online, will continue to contribute to more cases	No change		Approved
3.4 Technology, including machine learning, can help us become more effective and efficient	No change		Approved
3.5 People expect us to consider their complaints, but often feel less strongly about how we should then act; they don't always expect an investigation, particularly if they're in the habit of using 'reporting' functionality on social media platforms	No change		Approved
3.6 Resolving cases – including competitor complaint cases – quicker is important for protecting people, for maintaining a level playing-field and for the confidence of the advertisers who fund us	No change		Approved
3.7 Media convergence and new EU law will continue to challenge the way audio-visual media are regulated	Move to 2.1	Better fit with first key driver in Online	Approved

3.8 The UK is set to leave the EU, but globalisation will continue despite the increase in protectionist policies	Move to new 1.4	Better fit with People and the planet strand	Approved
Strategic decisions			
3.9 We will make sure we recruit and retain the best people, which includes people from diverse backgrounds, so we can reflect and represent the people of the UK. We will ensure their skills and experience are supported by our better use of technology	Move to new 1.10	Better fix with People and the planet strand	Approved
3.10 We will deliver the highest quality proactive regulatory projects on ads that cause the most detriment to people, including focusing on protecting particularly vulnerable people and on appropriately limiting children and young people's exposure to age-restricted ads in sectors like food, gambling and alcohol. Our intelligence-gathering, our own primary research and our expert analysis will be key to determining where and how we should act	Renumber 3.7		Approved
3.11 We will prioritise better, even if it means pivoting away from some issues and reinterpreting our current "we'll always do something" principle	Renumber 3.8 Change to: "3.8 We will prioritise our scarce resources better, even if it means pivoting away from some issues and reinterpreting our current "we'll always do something" principle acknowledging that not all demands are equal. We will continue to deliver efficiencies"	Simplify and refer explicitly to delivering efficiencies	Approved
3.12 We will explore using machine learning to improve our regulation	Renumber 3.9 Change to: "3.9 Investing in in-house data science capability will be critical	We are already using machine learning	Approved

	to us using machine learning to improve our regulation”	Strengthen reference to investing in data science	
3.13 We will explore lighter-touch ways of allowing people to let us know what they think, adding to our intelligence and helping us to listen better	Renumber 3.10		Approved
3.14 We will explore whether our decision-making processes and governance always allow us to act nimbly, in line with people’s expectations of regulating an increasingly digital advertising world. We will learn from other advertising regulatory bodies to improve our processes, including our competitor complaint process. And we will aim to simplify our regulation where possible	Renumber 3.11		Approved
3.15 To get better at solving cross-border issues, we will continue our engagement with supranational organisations and institutions, including through our membership of the European Advertising Standards Alliance (EASA) and the International Council for Ad Self-regulation (ICAS)	Move to new 1.8	Better fit with People and Planet strand	Approved
4. Buy-in			
Key drivers			
	New key driver: “4.1 The movement of ad budgets from easier to levy media to harder/impossible to levy media and platforms, coupled with public and societal demand for the ASA to tackle website and social media advertising which is not subject to the levy, has put pressure on our	Strategy needs to refer explicitly to funding challenge Move to number 1 in section and other wording changes	Approved

	<p>funding. That pressure has increased because of uncertainty around the impact of both Brexit and the coronavirus crisis. For the ASA to continue to deliver effective regulation, an amended model must put our funding on a sustainable basis”</p>		
<p>4.1 The Internet relies on flat hierarchies and networks. If we reflect that by working more closely with the large online platforms, so we help each other protect people from irresponsible ads (see 2), we will get better buy-in from them and improve our online ad regulation</p>	<p>Renumber 4.2</p>		<p>Approved</p>
<p>4.2 Although the industry continues to support the ASA system, some online-only advertisers don't buy-in to the ASA system, which they see as part of the establishment they're disrupting. Some retailers think our online remit is overly wide, has insufficient regard for the existing regulatory settlement between them and statutory regulators, is insufficiently formal and joined-up with other enforcement bodies and contains processes that are overly narrow and paper-based. Some big brands no longer see the system as theirs. The long-tail (micro- and SME businesses) often don't know us and might not see their websites and social media spaces as advertising</p>	<p>Renumber 4.3</p>		<p>Approved</p>
<p>4.3 Too many involved in social influencer advertising don't know or don't care about playing by the rules, in particular by making it clear when content is advertising</p>	<p>Renumber 4.4</p>		<p>Approved</p>

<p>4.4 Although we have raised awareness of the ASA, and CAP has radically increased the number of pieces of advice and training it has delivered, too many in the industry don't know us well enough and don't use our advice and training services</p>	<p>Renumber 4.5</p>		<p>Approved</p>
<p>Strategic decisions</p>			
	<p>New strategic decision: "4.6 We will work closely with the ad industry and other relevant stakeholders to help Asbof and Basbof put our funding on a sustainable basis. That will include making the case for effective advertising self- and co-regulation, including to online-only advertisers and 'the long tail'"</p>	<p>Strategy needs to refer explicitly to funding challenge</p>	<p>Approved</p>
<p>4.5 We will seek to work more closely with the large online platforms, invite their greater engagement in the ASA system and explore opportunities to engage in and improve their advertising compliance processes</p>	<p>Renumber 4.7 Change to: "We will seek to work more closely with..."</p>	<p>We are working with the platforms</p>	<p>Approved</p>
<p>4.6 We will seek to get online-only advertisers to engage more positively with the ASA system, by highlighting the benefits of our regulation and being open to regulating differently, for example by exercising more discretion over whether and how we take action. We will seek to improve buy-in from retailers by doing the same, showing them that we respect and cooperate with rather than compete with statutory regulators. We will remind brands who might drift away that the ASA system is their system. We will raise awareness of our regulation to 'the long-</p>	<p>Renumber 4.8</p>		<p>Approved</p>

tail', including by seeking to collaborate with platforms on which those businesses advertise			
4.7 We will further raise awareness of our regulation to influencers, celebrities, talent/social/PR agencies and the brands who use them	Renumber 4.9		Approved
4.8 We will invite greater engagement with and better promote our advice and training services to the industry	Renumber 4.10		Approved
5. Enforcement			
Key drivers			
5.1 People understand that online is difficult to regulate, but they think it's still too easy to come across irresponsible UK online advertising, for example through search. And some established brands think we're ill-equipped to tackle those online-only advertisers who regularly flout the Codes, but who give assurances to the ASA that they'll comply when we challenge them	No change		Approved
5.2 We're primarily able to deal with companies who want to play by the rules and we need to deal differently with those who don't, especially those we suspect of running fraudulent businesses. Working with statutory regulators will be important, but there will be gaps that no-one can fill	No change		Approved
Strategic decisions			
5.3 Through better cooperation, more technological tools (including machine learning) and more resources, we will improve our identification and removal of	No change		Approved

irresponsible ads (particularly online) and our sanctioning of non-compliant advertisers. We will seek to ensure there is always a proportionate cost to non-compliance			
5.4 We will recognise scams earlier, so we can refer scam traders to statutory regulators better placed to deal with them	Change to: “We will recognise scams earlier, so we can disrupt them by securing the removal of their ads and refer scam traders to statutory regulators better placed to deal with them”	Better reflects our Scam Ad Alert system	Approved
6. Independence			
Key drivers			
6.1 Governments across the UK are increasingly willing to legislate in areas covered by the ASA system, in particular advertising on TV and on social media platforms	No change		Approved
6.2 Some public figures don’t share our view of the independence and/or effectiveness of advertising self-/co-regulation	No change		Approved
Strategic decisions			
6.3 We will continue to regulate without fear or favour, taking account of the evidence-base at all times; continuing to exploit research insights will be a key part of demonstrating our impartiality. We will continue to demonstrate the effectiveness of our regulation – including in response to challenges to TV and online ad regulation – through our actions and our communication, but we’ll be open-minded	Change to: “...but we’ll be open-minded to change that strengthens the ASA system (see 2.1 and 2.5 above)”	Signpost to VSP and possibly other online advertising co-regulation	Approved

to change that strengthens the ASA system			
6.4 We will listen carefully to challenges that the ASA system is not sufficiently independent or effective, engaging constructively and, where necessary, making changes to improve our independence, openness, accountability and effectiveness	No change		Approved