

Age-restricted ads online

Advertising Guidance
(non-broadcast)

Legal, decent, honest and truthful



Foreword

The Committee of Advertising Practice (CAP) offers guidance on the interpretation of the UK Code of Advertising (the CAP Code) in relation to non-broadcast marketing communications.

The Broadcast Committee of Advertising Practice (BCAP) offers guidance on the interpretation of the UK Code of Broadcast Advertising (the BCAP Code) in relation to broadcast marketing communications.

Advertising Guidance is intended to guide advertisers, agencies and media owners how to interpret the Codes but is not a substitute for those Codes. Advertising Guidance reflects CAP's and/or BCAP's intended effect of the Codes but neither constitutes new rules nor binds the ASA Councils in the event of a complaint about an advertisement that follows it.

For pre-publication advice on specific non-broadcast advertisements, consult the CAP Copy Advice team by telephone on 020 7492 2100, by fax on 020 7404 3404 or you can log a written enquiry via our [online request form](#).

For advice on specific radio advertisements, consult the [Radio Advertising Clearance Centre \(RACC\)](#), and for TV advertisements, [Clearcast](#).

For the full list of Advertising Guidance, please [visit our website](#).

Fundamentals of responsible targeting

This guidance helps marketers, agencies, media owners, and other parties ensure age-restricted online ads are targeted responsibly in line with the CAP Code. It outlines how to avoid directing such ads at children (under-16s) or young people (under-18s), depending on the product.

Products with Age-Based Targeting Restrictions

- **Must not target under-18s:** Alcohol, gambling (most types), cosmetic interventions, National Lottery, weight loss services, tobacco, e-cigarettes.
- **Must not target under-16s:** HFSS foods, some forms of gaming, medicines, society lotteries.

ASA Enforcement Approach

- Marketers must demonstrate appropriate targeting decisions and are strongly advised to retain records of the decisions they have taken.
- The ASA will assess the context of where ads appear (e.g. platform, channel, influencer followers).
- Failure to use targeting tools and to exclude media disproportionately popular with children can result in a Code breach.

Planning a Responsible Campaign

Media Choice

- Avoid content/media clearly directed at children.
- 25% Rule: Ads must not appear where over 25% of the audience is within the protected age group.
- Use inclusion lists of suitable content or exclusion lists of known unsuitable content as well as audience data.
- Steer clear of uncategorised or unclassified media.

Age-Based Targeting

- Don't rely solely on age data – use verified customer data where possible.
- Supplement age-based targeting filters with behavioural and interest-based targeting.

Interest & Behavioural Targeting

- Target adult interests (e.g. insurance, business, travel).
- Avoid youth interests/trends (e.g. toy brands, teen influencers).
- Combine behavioural data (e.g. purchase intent) with declared interests.

Performance Monitoring

- Monitor live campaigns for audience profile.
- Adjust in real time and apply learnings to future campaigns.
- Consider post-campaign audits.

Organic & Influencer Content

- Age-restricted posts on owned or influencer social media accounts must also comply.
- Assess platform/user age profiles.
- Use audience restriction settings (e.g. logged-in adults only).
- Avoid creators with strong youth appeal or unverified audience demographics.

Practical Steps

- Use layered targeting: age, interest, behaviour, exclusions.
- Keep records to demonstrate compliance.
- Collaborate with platforms/partners who provide age-assurance tools.

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1. Background

The popularity of digital media, including social media and video-sharing platforms, and the specificity of the data available from their use, make them an obvious medium for marketers looking to reach particular audiences at scale. This includes marketers of ads that are subject to the CAP Code's media placement restrictions (referred to in this guidance as "age-restricted marketing communications").

CAP's media placement restrictions apply to particular categories of product irrespective of the content of a marketing communication. The restrictions require that age-restricted marketing communications are not directed at children (under-16s) and young people (aged 16 and 17) – depending on the products advertised – and do not appear alongside media where children and/or young people form more than 25% of the audience (**the 25% rule**).

Marketers are required to appropriately limit children's exposure to age-restricted ads by demonstrating that they have taken proactive and reasonable steps to ensure their ads are, in general terms, targeted at an adult audience, and away from a child audience. This might include selecting media placements where the 25% rule has been met (meaning adults comprise 75% or more of the ad's overall audience) and using available targeting tools to reach adult audiences, and limit still further the number of children who would see the ad. The standard is not absolute exclusion but a demonstrable, proportionate effort to appropriately limit children's exposure.

2. Age-restricted marketing communications

Age-restricted marketing communications are those for products subject to legal restrictions on their sale to people of a specified age (under-16/18) or where there is another policy basis (e.g. public health, nature of the marketing communication content) for limiting the protected age group's exposure.

Ads for the following products or services must not be directed at people under **18** through the selection of media or the context in which they appear. No medium should be used to advertise these products or services if more than 25% of its audience (the 25% rule) is under **18** years of age:

- Alcohol (rule [18.15](#))
- Cosmetic interventions (rule [12.25](#))

- Gambling (excluding products specified in the next section) (rule [16.3.13](#))
- National Lottery (rule [17.14](#))
- Rolling papers or filters (rule [21.5](#))
- Weight-reduction regimes or establishments (rule [13.3](#))
- Alcohol alternatives (rule [18.23](#))

Ads for the following products or services must not be directed at people under **16** through the selection of media or the context in which they appear. No medium should be used to advertise these products or services if more than 25% of its audience (the 25% rule) is under **16** years of age:

- Food and soft drink high in fat, salt or sugar (rule [15.18](#))
- Football pools, equal-chance gaming (under a prize gaming permit or at a licensed family entertainment centre), prize gaming (at a non-licensed family entertainment centre or at a travelling fair) or Category D gaming machines. (rule [16.3.13](#))
- Medicines (rule [12.16](#))
- Society lotteries (rule [17.14](#))

Ads appearing in third party paid-for space for these products are not permitted:

- E-Cigarettes and e-cigarette refill containers
- Infant formula
- Prescription-only medicines
- Tobacco

Whilst some other products such as knives or nicotine pouches do not attract an explicit age-targeting restriction under the CAP Code, the ASA would expect marketers of those products to avoid directing their ads at audiences under the age of 18 on the basis of social responsibility. The same expectation would apply to ads unsuitable for under-18s because of the creative content of the ad; for example, because it is sexually explicit, depicts or suggests especially violent acts etc.

3. Who should use this guidance?

This guidance is principally for marketers using programmatic advertising in open online environments, advertising on social platforms, or using other paid advertising and organic content in online media subject to the CAP Code. It should also be used by [affiliates](#), agencies and other third parties acting on a marketer's behalf in targeting ads

(for example, influencers and content creators).

It supports all parties in helping them demonstrate they have taken adequate steps when targeting age-restricted marketing communications to appropriately limit children and young people's exposure to those marketing communications, and to satisfy the ASA they have complied with the relevant restrictions in the CAP Code.

However, parts of this guidance may also be useful to others involved in targeting of non-broadcast marketing communications in digital media; for instance:

- digital media companies and ad technology providers seeking to offer tools and audience information to help marketers satisfy the targeting requirements of the Code;
- marketers of non-age-restricted products seeking to ensure marketing communications with age-sensitive content or themes are appropriately targeted; or
- marketers of other products (e.g. adult-oriented media such as video games and films) that may be inappropriate for certain audience age categories.

Where marketers process personal data to support appropriate targeting of advertising, they must comply with all legislation governing such processing.

4. Additional factors marketers should consider

There are dependencies in the online advertising demand and supply chain which can determine whether age-restricted ads ultimately appear in the types of media, publications, channels etc. targeted by the marketer. Marketers and their agencies should try to work with parties that appropriately lessen the chances of age-restricted ads appearing in contexts disproportionately popular with children.

Publishers:

- Classifying their sites correctly (for example, a website aimed at GCSE and A-level students ensuring it was not classified broadly as “reference and directory”, but specifically for child education purposes, or a Youtube channel correctly classified as ‘Made for Kids’ or child-directed).
- Ensuring affiliate partners are acting appropriately and complying with the Code.
- Actively monitoring audience profiles on an ongoing basis, ensuring they

correctly categorise themselves if data shows their sites regularly attract a disproportionate amount of under-18s in the audience.

Platforms and intermediaries:

- Placing few limitations on the availability of targeting tools, ensuring marketers can exclude with confidence sites attracting a disproportionate audience of under-18s.
- Ensuring better characterising, categorising, or filtering of age-restricted ads.

5. ASA approach to enforcement

Following a complaint or evidence from monitoring activity regarding inappropriate targeting of a marketing communication, the ASA will assess the marketer's placement and targeting decisions in relation to the selection of media or the context in which the ad appeared.

Marketers should be able to demonstrate to the ASA they have taken into account the requirements of the relevant media placement restriction for each part of their campaign and have acted accordingly through their placement and targeting decisions to limit the exposure of a protected age group.

The ASA will assess targeting cases with consideration of the context in which web users are likely to have seen an ad. For example:

- a paid-for ad served to users on a video sharing platform will be assessed based on audience data for the specific video and/or the specific channel it appeared in or around; and
- a paid-for social media post by an influencer will be assessed based on that account's followers and/or subscribers.

Marketers should have a record of or otherwise be able to account for where ads appeared and their likely audience. Even if the targeting approach or online environment chosen does not provide an exact record of the audience being shown an ad, marketers should be able to demonstrate how the steps they have taken served to appropriately limit the likelihood of the protected age group seeing the ad.

Marketers of age-restricted products should consider the suitability of all tools available to target their campaigns. CAP cautions marketers of age-restricted products that failure to show the ASA they have considered the likely audience of a medium or piece of online content and/or the need to employ available targeting tools appropriately is highly likely to represent a breach of the Code.

Some approaches attract lower risk and so may not require utilisation of the full range of targeting tools. An ad for a high-end whisky targeted at older adults using interests that naturally exclude children and young people – e.g. ‘home insurance’, ‘family holidays’, readership of particular publications – will have a lower risk of being seen by the protected age group than an ad for a gambling product targeted around interest in popular Premier League footballers.

CAP advises marketers to incorporate understanding of the Code’s requirements into their compliance processes and campaign planning. They should also ensure other parties involved in developing and publishing a campaign – for instance, agencies, influencers and affiliates – are aware of and follow the requirements of the relevant media placement restrictions.

Highlighted sections throughout this document provide scenario-specific guidance on complying with the ASA’s requirements for responsibly targeting age-restricted ads in a variety of contexts online.

Developing a Responsible Age-Restricted Ad Campaign

Marketers have ultimate responsibility for ensuring age-restricted campaigns are targeted appropriately. Marketers should make their own internal targeting policies clear to all parties involved in delivering a campaign and ensure those parties are familiar with the targeting and content restrictions of the CAP Code. Marketers should implement policies internally and with their partners to retain headline details of targeting approaches to provide supporting evidence in the result of an ASA investigation.

Whether working with a partner or using self-service tools, marketers should consider the following key issues to ensure their chosen approach supports compliance with the CAP Code by actively targeting appropriate audiences and avoiding the protected age category:

Media Choice:

- ☐ What steps can you take to ensure ads are not served alongside media commissioned for the protected age group, or with a disproportionately large audience in the protected age group i.e., [the 25% rule](#)?
- ☐ How can you avoid serving ads alongside media which has not yet been appropriately categorised?
- ☐ Can data from other sources be incorporated to ensure specific media are avoided, for example a blocklist of inappropriate websites?
- ☐ How can the approach ensure ads are only served in known media environments – for example by using inclusion lists of suitable content or exclusion lists of known unsuitable content?

N.B. Some ad technology providers can provide these functions as part of a larger “brand safety” offering primarily intended to prevent ads appearing alongside extreme, controversial, or otherwise inappropriate content.

Age-Based Targeting:

- ☐ How can you use the available technology to ensure ads are targeted away from the protected age category and towards users in the appropriate category?
- ☐ Is the approach used to categorise users by age suitably robust?
- ☐ Can age-based targeting be enhanced with supplementary layers of age categorisation data from another source or data from verified customers?
- ☐ Can behavioural and/or interest-based targeting techniques further limit the protected age group’s exposure?
- ☐ Does the platform/media owner/technology partner have their own policies regarding age-based targeting which could support you in developing a responsible campaign?

Performance Monitoring:

- ☐ What monitoring tools are available during and after the campaign to support appropriately limiting exposure of the protected age group?
- ☐ How can findings from monitoring and/or data provided by third parties be applied to improve the targeting of future campaigns?

N.B. Monitoring live ad data during a campaign and amending the approach in response to concerning trends is possible in certain contexts and generally requires activation by the marketers/buyer, however this option is not always available or viable. Setting up a campaign to include post-campaign audits can support compliance and help marketers identify how approaches could be amended to support appropriately limiting exposure to the protected age group in future campaigns. Responding to information from monitoring allows marketers to mitigate the risk of repeated inappropriate targeting of age-restricted ads.

Given the regular changes and developments in online environments and associated ad technology, marketers should exercise caution when creating an age-restricted ad campaign. If an online environment or ad tech partner cannot offer appropriate provisions to support reliable ad placement based on age, interests, and media, it is unlikely to be suitable for responsible and effective age-based targeting.

6. Media placement restrictions

The appropriate approach to complying with CAP's media placement restrictions varies according to the:

- type of online media used;
- targeting tools available in different online environments; and
- contextual circumstances of a particular ad placement.

However, the rules controlling the placement of age-restricted marketing communications are all based on common requirements. The CAP Code's rules require that age-restricted marketing communications should not be targeted at the protected age category (under-16s or under-18s dependent on the specific product) "through the selection of media or the context in which they appear".

The Code rules have three key implications for different approaches to ad placement:

- No age-restricted ads should appear in or around media obviously directed at the protected age category irrespective of the method of targeting.
- For untargeted advertising, [the 25% rule](#) applies.
- Where marketing communications are directed at audiences based on data held by the marketer, media owner and/or other third party, targeting measures must be utilised to appropriately limit the likelihood of those in the protected age category from receiving them.

Although online environments can allow for more sophisticated methods of identifying and delivering ads to audiences, the core standards are consistent across all non-broadcast media. Marketers are encouraged to read this guidance in conjunction with CAP's general [guidance on media placement](#).

While this guidance is focused on ads which are age-restricted because of the nature of the advertised product, the principles may also be of use to marketers wishing to restrict the reach of an ad which contains content unsuitable for particular age groups (e.g. sexualized or potentially distressing content).

When considering complaints about targeting of age-restricted ads, the ASA will first assess whether the media alongside which the ad was served was inappropriate before considering further aspects of how the ad was targeted. To make this assessment, the ASA will consider whether content in the online environment is dynamic/user generated – for instance live news feeds or content streams – which can result in ads appearing in

different contexts tailored to individual user's interests and behaviour. In these environments marketers have little control over the content around which their ads appear, and the nature of the content is not used as a basis on which to target ads away from or towards individuals. In this context, isolated instances of ads appearing alongside inappropriate media are unlikely to represent a clear breach of the Code.

In most cases, inappropriate media can be identified through assessment of the primary themes or an overt indication of the intended audience, for instance:

- a video-sharing platform channel with content clearly and primarily for children or children and young people (e.g. fairy tales, school-age learning resources);
- a creator or social media influencer with an obvious editorial orientation toward child audiences (e.g. toy reviews); or
- a website offering content explicitly for children (e.g. children's games or stories).

These examples can be contrasted with media of broader audience appeal, such as family viewing or content aimed at young adults. The audiences for those types of media are likely to include children and young people but are not obviously directed at the protected age categories and are unlikely to fall foul of [the 25% rule](#).

To avoid breaching the Code's requirements on media for children or children and young people, marketers are strongly advised to:

- identify categories targeted at, or commissioned for the protected age group within the chosen online environment;
- exclude such media from their ad placements when they have direct control over where ads appear; and/or
- use the available ad tech tools to ensure age-restricted ads are not placed alongside media intended for the protected age group.

The ASA is likely to find marketers who cannot demonstrate they have satisfied these requirements to have breached the CAP Code.

Effective Media Choice for Age-Restricted Ads

The first step in responsible age-restricted advertising is ensuring ads are not served in or alongside content intended for, or particularly popular with, the protected group.

To avoid serving ads in inappropriate media, marketers can, where applicable:

- ☐ Use inclusion lists to direct ads to content that is clearly appropriate for age-restricted ads.
- ☐ Use exclusion lists to avoid particular media or media categories which are intended for the protected group e.g., children's entertainment; school-age educational content etc.
- ☐ Where possible, such as on large news sites, actively include subsections of sites primarily intended for the appropriate age group – e.g. parenting, finance, motoring – and exclude sub sections with content intended for the protected age category – e.g. children's cartoons and activities.
- ☐ Use relevant and recent audience data – via third-party providers or directly from media owners/platforms – to exclude content where the protected group is over-represented i.e., [the 25% rule](#).
- ☐ Use supplementary tools to focus on an approved list of suitable and very similar media which is clearly appropriate for age-restricted ads.
- ☐ Avoid uncategorised media or media for which audience data is not yet available.
- ☐ Exclude key words and topics likely to be popular with the protected age group e.g., celebrities and media particularly popular with younger audiences. Content analysis tools can support identification and exclusion of topics and phrases likely to be specifically popular with the protected age group.

Many of the above media choice solutions can be performed in conjunction with one another, though this may not always be necessary. The most thorough approach will involve using specific inclusion lists in the first instance then applying additional functions – CAP recognises this can unduly limit the scale of a campaign and so is not always suitable. Supplementary tools such as those intended to support brand safety can help marketers identify and avoid inappropriate and inaccurately categorised content.

7. Targeting ads online

Online environments offer marketers a range of placement and targeting approaches. Programmatic advertising is commonly used across a range of online media including on websites and within specific environments such as apps and games. Programmatic advertising allows marketers to serve relevant ads to audiences based on users meeting a pre-determined set of criteria (e.g. a combination of factors known or inferred about groups of users). In many environments marketers can also use pre-determined criteria to exclude certain audiences, such as those in a protected age category and include or exclude specific content categories or even individual sites/channels.

Advertising placement and targeting can be managed using tools provided by platforms, publishers, media owners, intermediaries, and other ad tech companies. Such tools vary in sophistication and the data underpinning these tools can come from a variety of sources. In some instances, the data is actively provided by users, for example when they create an account or profile. In others, it is inferred from certain user behaviours or based on information collected from a user's device. Sometimes it is a combination of all of these.

This wealth of data allows marketers to serve ads that, for example, are only targeted at a group of individuals falling within a particular age range, residing in a set location, and having specific interests. This guidance is based around the premise that marketers can exclude certain audiences from a campaign in the same fashion to comply with CAP's media and audience placement restrictions.

Placement and targeting of online marketing present a variety of compliance challenges. Despite the many steps taken across online environments to ensure the integrity of data, it is inevitable that some incorrect information may be submitted or inaccurately inferred. Reasons for this may include:

- younger users misreporting their age;
- multiple users sharing a single device; or
- issues with the accuracy of inferred age data.

On some platforms, non-logged-in users can access content and be exposed to ads. Inherently, platforms have access to fewer data points relating to the non-logged-in users in an audience than they do for logged-in users. Marketers placing age-restricted ads in environments where ads are served to non-logged-in users (i.e. where no given data is available from a user account) should therefore exercise additional caution.

Though age-verification technologies continue to develop and may become more rigorous in the future, concerns persist about users falsely declaring their age and sharing devices. As a result, targeting solely on the basis of age data – selecting a specific adult demographic and/or excluding younger age groups – is unlikely to satisfy the requirements of CAP’s media placement restrictions.

A child who misreports their age is likely to remain interested in content designed for their actual age and less interested in content designed for adults. Marketers should seek to reinforce their use of demographic data with interest and behavioural data to ensure age-restricted ads are directed at audiences with adult interests and limit exposure of the protected age group. Overall, the profile of interest-based factors selected or deselected should clearly favour adults over the protected age group.

Where children and young people do see age-restricted ads, CAP’s strict content rules for gambling, alcohol etc. ensure the creative content of the ads does not appeal unduly to children or young people and does not condone or encourage irresponsible behaviour in relation to the products.

Key Points for Responsible Targeting of Age-Restricted Ads

To appropriately limit children and young people's exposure to age-restricted ads, marketers should use the appropriate tools within a particular online environment.

These tools include but are not limited to:

- **Age-based Targeting:**

Where such tools are available, the first step should be to actively exclude the protected group or, where appropriate, use age-based targeting tools. Marketers should, where possible, exclude users whose age cannot be accurately established – this may include users accessing a platform without logging in.

Relying solely on inferred or declared age data is unlikely to be fully effective in appropriately limiting exposure of the protected group as some in the protected group may have falsely declared themselves to be in or inaccurately been categorised into a higher age group.

Marketers should exercise additional caution when targeting a group close to the protected age – e.g. 18-24-year-olds for alcohol advertising. Using segmented age categories to target older groups e.g. 25+; 35-49, lowers the risk of users in the protected group being exposed to an ad as they are less likely to be inferred to be in a higher segmented age category than a broader 18+ category.

- **Interest-based Targeting:**

Interest-based targeting relates to the browsing and content consumption habits of users online. Inclusion of interests strongly linked to adult age groups – such as home insurance or business travel – alongside the primary interests targeted by a campaign will support the exclusion of users whose age has been incorrectly categorised, as those users are likely to have behaviours and interests which align with their actual age. This is particularly relevant when running a campaign linked to an interest with wide appeal across age groups, such as an international sporting event.

Marketers should adjust their approach based on whether the interest-based targeting tools are exclusionary or inclusionary. Some online environments may only offer the option to serve ads to users who are interested in either home insurance or The Olympics, rather than exclusively to users interested in both home insurance and The Olympics. An “or” rather than “and” interest-based approach will not be effective in appropriately limiting exposure to users in the protected age category.

Where possible excluding interests strongly associated with the protected age group, for example a clothing brand or media property aimed at young people, can help appropriately limit the exposure of the protected group to an age-restricted ad.

- **Behavioural Targeting:**

Where available, behavioural data enables marketers to target people based on actions in online environments, such as purchase behaviour, intent, and device usage. For example, a user who has been downloading specifications for various electric cars would be considered to have an intent to purchase an electric car. This data can be used to retarget appropriate users.

Where available, behavioural data – for example relating to the activity of past customers or verified age-appropriate users – can be combined with interest-based targeting to further support appropriately limiting children and young people’s exposure to age-restricted ads, and ensure they are targeted towards the appropriate age category.

User actions can be monitored through tracking tools provided by platforms and ad technology companies. Tools such as tracking pixels on a marketer or publisher’s page, or within the ad itself can support targeting decisions for future campaigns.

- **Use of Additional Data:**

Where such technology is available, data from other sources can be incorporated into ad targeting to supplement age-based targeting and provide additional means of limiting the risk of users in the protected age category being served age-restricted ads. This data could come from a variety of sources, including suitably validated age data from a tech partner, or data on existing customers who have completed robust age checks or offered reliable indicators they are outside the protected age category e.g., providing credit card details.

N.B. The ASA does not endorse or validate specific approaches to age assurance and there is not currently a widely recognised standard methodology. Marketers should consider the appropriateness and reliability of any age assurance approach available to them, or which they choose to incorporate.

In environments where multiple targeting data sources can be layered, marketers can use “and”, “or”, and “not” criteria to ensure responsible targeting without unnecessarily restricting the scope of their campaigns. For example, by targeting users at a high level based on profiles, such as “Sports Enthusiast” and excluding interest categories strongly linked to the protected age group, e.g., “fan of Cartoon Network”, a marketer can limit the exposure of children interested in sports whilst also delivering their campaign at scale.

8. Limiting exposure to organic marketing communications

Organic ads generally fall into two categories:

- those published by marketers themselves in their own online spaces (e.g. their website or social media page); or
- paid-organic content published by third party users of a network or platform on behalf of a marketer (e.g. affiliates, [influencers and content creators](#)).

Such communications are generally untargeted, and marketers are required to demonstrate to the ASA – primarily through the audience data they hold – that [the 25% rule](#) has been met.

CAP acknowledges the extent, nature (e.g. first vs third party data) and precision of audience data available to marketers varies between media. Marketers are nevertheless strongly encouraged to make best use of the data available to them – either directly, through the publisher or media owner, or a third party – to develop as clear a picture as possible of the likely audience of a medium, content creator, or a specific piece of content.

Identifying the likely audience of a medium may involve using data:

- direct from the accounts of specific content creators;
- related to the audience of significantly similar content (e.g. where an influencer uses multiple social media and/or video sharing platforms, follower or subscriber data will often be cross-applicable); or
- drawn from logged-in users where marketers can satisfy the ASA this is likely to reflect the wider audience in media that can also be accessed without logging in.

Where audience data is unavailable or is to a significant extent unreliable, marketers are cautioned the ASA will rely on other factors to assess likely appeal and therefore likely audience composition. Principally, this will involve an assessment of the media content in or around the post on the marketer's account – including themes, imagery and the like – and the context in which it appeared. If the ASA considers there is a reasonable risk that a significant proportion of the audience was comprised of children and young people, the marketer is likely to be found in breach of the Code.

In general, the ASA will assess an organic marketing communication on the basis it is available to the whole audience for the social media account or video sharing channel in question. However, the ASA will consider if the post was made publicly available or if the marketer utilised available tools to restrict access, such as preventing users who are not logged-in from viewing the post. Where non-logged-in users can access content, the audience is likely to be wider than logged-in users.

Marketers are encouraged to use the available tools to appropriately limit the extent to which logged-in and non-logged-in users in the protected age group can view and interact with organic content. Marketers are also encouraged to work with social media accounts/content creators that have applied available age-gating settings to prevent users in protected age groups from accessing and/or interacting with their content.

Age-Restricted Campaigns on Owned Social Media

Organic age-restricted ads on social media are subject to the same prohibitions regarding content and placement as other age-restricted marketing communications.

Depending on the context and platform, marketers may consider the following approaches to limit exposure of the protected age group to posts marketing age-restricted products:

- ☐ Place restrictions on who can see a post e.g. only existing followers or logged-in users in the appropriate age category. Review subscriber/follower information on your account to ensure users in the protected category are not seeing age-restricted posts.
- ☐ If information on user/audience age profiles is not available directly from a platform, third party sources can provide indicative data about what age groups use the platform and the types of content they favour.
- ☐ Analyse the performance and engagement of similar campaigns on your chosen platform – and other platforms if necessary – to avoid including themes particularly popular with the protected age category.
- ☐ Where possible monitor engagement with posts and take steps to address indicators they are receiving disproportionate engagement from the protected age group.
- ☐ If a platform includes an automated recommendations engine or mechanism through which posts are promoted to wider users, marketers should make use of tools and account settings to limit which users the post will be recommended to or consider removing the post from the recommendation system. This process can be supported by ensuring posts are fully and accurately categorised using tools available within the platform – for example tagging a post to indicate it contains promotion of alcohol or content related to gambling.

Working with Content Creators and Social Media Partners

When working with content creators or social media influencers, primary responsibility for ensuring age-restricted marketing communications are served appropriately remains with marketers. However, influencers and other parties involved in preparing or publishing a marketing communication must also accept an obligation to abide by the Code.

Organic posts cannot usually be targeted at specific subsets of users, but various steps can help marketers limit exposure of the protected age group to age-restricted posts:

- ☐ Review the creator account's data or use suitable third-party monitoring partners to establish whether they have a significant audience in the protected age category. If the creator has accounts across several platforms, it may be appropriate to review demographic data from these platforms as well, or to assess reliable third-party data where available.

N.B. If a creator account is on a platform with limited age checks, or where content is commonly accessed by non-logged-in users, marketers should exercise additional caution when running age-restricted ads.
- ☐ If age analytics are not available for individual creator accounts, consider using third party data and insights to establish whether the platform as a whole is disproportionately popular with the protected age group.
- ☐ Consider placing restrictions on which users can see the post containing the age-restricted ad e.g. logged-in users only; only users in the appropriate age category.
- ☐ Where data and targeting choices are available avoid using themes and trends which have previously been particularly popular with users in the protected age category on that platform.
- ☐ Where possible review the levels of engagement with the post or uptake of an affiliate link/promotion code. Respond to indicators of inappropriate levels of engagement by the protected group, making adjustments to ensure subsequent campaigns can appropriately limit such engagement.

Working with content creators who are unable to provide suitable demographic data or comply with appropriate steps to appropriately limit the exposure of the protected group represents a risk on the part of the marketer that the campaign will breach the CAP Code.

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Advice on specific non-broadcast marketing communications is available from the Copy Advice team via the [online request form](#).

The [Advice and resources](#) section of the CAP website contains a full list of Advertising Guidance notes as well as access to the full AdviceOnline database, which links through to relevant Code rules and ASA rulings.

Committee of Advertising Practice

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