

Protecting Children Online

Monitoring ad targeting breaches on children's websites and YouTube channels April 2020 – March 2021

Executive Summary

For twelve months, between 1 April 2020 and 31 March 2021, the ASA undertook a new proactive approach to monitoring and tackling instances where, in breach of the rules, age-restricted ads appeared on children's websites and YouTube channels.

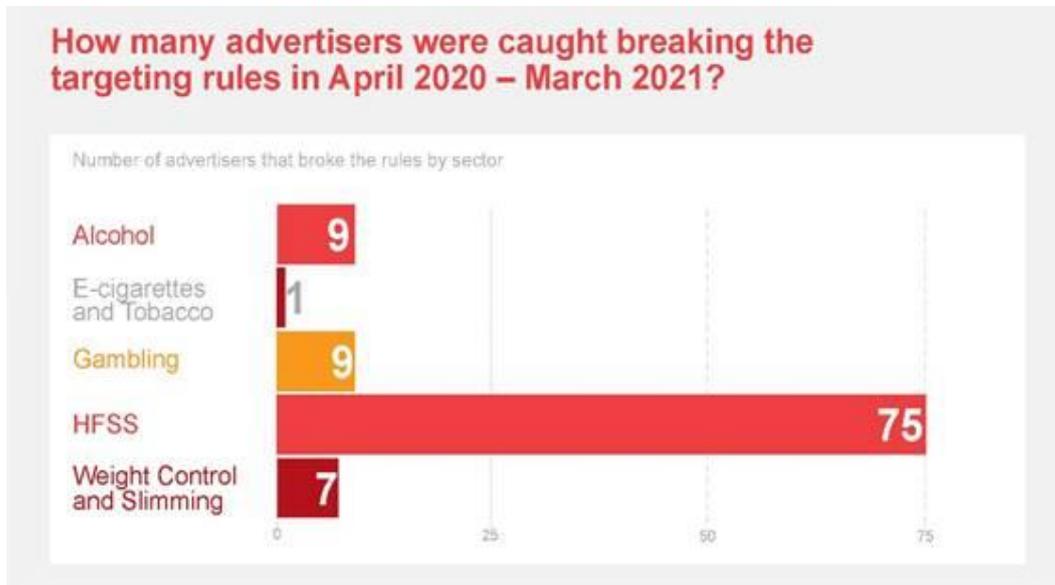
We ran quarterly monitoring exercises across approximately 60 different sites and we reported publicly on the findings, sharing our reports with regulatory stakeholders and relevant industry groups. For each incidence of non-compliance we identified, we contacted the advertiser to ensure their ad (for alcohol, gambling, high fat, salt or sugar products etc.) was removed. We also advised them to review their online targeting processes to ensure their ads would not be published again on these or other children's sites.

The breaches we identified are regrettable and avoidable, but they do not reflect the overwhelming majority of ads, online and offline, which are targeted in compliance with the UK Advertising Codes. Future online monitoring projects will consider how we might better contextualize such incidences of non-compliance against an overall compliance rate.

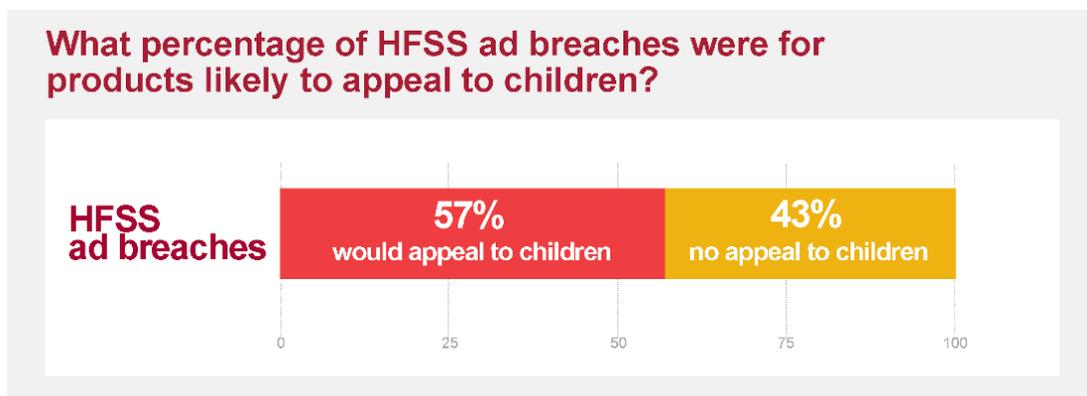
Through this and others proactive approaches the ASA is seeking to build a culture of zero tolerance for age-restricted ads appearing in children's online environments. This report reflects on the trends we saw throughout the twelve months and reports the outcome of compliance actions taken against advertisers.

Findings

Over twelve months we identified 101 advertisers whose ads breached the targeting rules.



The overwhelming majority of the breaches related to ads for foods and soft drinks high in fat, salt or sugar. Of these ads, we considered 43 (57%) promoted HFSS products likely to appeal to kids (i.e., sweets and biscuits) and 32 (43%) promoted HFSS products that we considered are not likely to appeal to kids (i.e., olive oil and cooking sauces).



Our four quarterly reports can be found [here](#).

Repeated cases of non-compliance

For each incidence of non-compliance, we contacted the advertiser and sought written assurances that they would amend their processes to ensure that their ads would not be published again on these or other children's sites. Of these 101 advertisers, 90 (90%) were not found to have breached the rules again in subsequent monitoring periods, but 12 advertisers (10%) were found to have done

so¹. We have since worked further with these advertisers to satisfy ourselves that robust measures have been put in place to ensure compliance. All of the advertisers gave assurances that they had subsequently put in place site-specific block lists or inclusion lists and the majority of them evidenced closer working with their marketing agencies to help ensure their ads were targeted appropriately. As a result of the actions taken we do not feel further action is necessary at this time, but we informed them that the ASA and CAP reserved the discretion to take more punitive action in cases of repeated incidences of non-compliance.

Aldi Stores Ltd
Arla Foods Ltd
Costcutter Supermarkets Group Ltd
ElectraWorks Ltd
INCX Ventures Inc
Link Snacks Inc

Mars Ltd
Mondelez UK Ltd
Naked Wines plc
Noble Desserts Holdings Ltd
Papa John's (GB) Ltd
Walkers Snacks Ltd

In all but two cases (Naked Wines plc & ElectraWorks Ltd), the listing of these advertisers relate to ads for food or soft drinks high in fat, salt or sugar.

Methodology

Our reports were based on data collated by research agency, Nielsen, and reported via its media monitoring tools.

We monitored the same 49 websites across the four reports. Our first two reports also looked at seven YouTube channels. For subsequent reports, we were able to add a further five children's YouTube channels to our monitoring sample.

In order to determine which websites and YouTube channels to monitor, we reviewed their content and used online audience measurement data from October 2019. Further details of our methodology can be found [here](#).

While the audience data we reviewed was from 2019, we did not see evidence from advertisers to suggest that audience profiles had changed significantly, or had consistently been below 25% for children, prior to placing their ads. However, for future monitoring exercises it would be optimal to continually access this data to track any changes in audience profiles.

Round Up

The vast majority of advertisers, often working with marketing intermediaries, were able to demonstrate to the ASA that they had used targeting tools designed to target their ads away from child audiences online, for example by targeting their ads to internet users with self-declared or inferred age profiles that suggested they were adult in age. However, the ASA observed from the breaches identified that insufficient attention had been given to ensuring that age-restricted ads were not

¹ As monitoring ran over consecutive quarters, the collation and assessment of monitoring outputs could not be completed until the following quarter, when advertisers were informed about their breaches and required to avoid further breaches in subsequent monitoring quarters. 11 advertisers were found to have breached the rules again in these subsequent quarters.

ultimately placed in children's media, for example through the adoption of site-specific block lists or inclusion lists.

The ASA advises advertisers of all age-restricted products to ensure that they (and any third-party intermediaries they work with) use the latest audience data available to ensure that they are targeting their ads away from websites and YouTube channels where children comprise a disproportionately large percentage of the child audience. We advise as best practice that advertisers and agencies draw up a list of approved online sites, using the latest industry audience data. The Committee of Advertising Practice provides Guidance on Media Placement Restrictions, to support marketers of age-restricted ads in meeting their related regulatory responsibilities².

In October 2020, YouTube introduced a new policy to restrict the serving of ads for high fat, salt or sugar (HFSS) food and drink products to those aged under 18 in the UK and the EU³. While YouTube comprised 20% of the media monitored; 35 (47%) of the 74 advertisers found to have targeted HFSS ads in breach of the Code did so on YouTube channels only, with 16 advertisers recording a breach after YouTube introduced its new policy to restrict HFSS ads.

As well as contacting the advertisers, we also alerted YouTube to the 16 advertisers whose HFSS ads had appeared on a children's YouTube channel after its new policy was introduced with the mutual aim of ensuring the enforcement of its policy is suitably robust. The ASA understood, for example, that YouTube's policy required advertisers to self-declare that they were using an account to run HFSS food and soft drink ad campaigns, with all the ads distributed from that account being subject to the stated restriction. (Self-declaration recognises that advertisers are best placed to know the nutrient profile of their products and to determine whether they are high in fat, salt or sugar.) Some advertisers explained to the ASA that the self-declaration form was not obvious, which may have accounted for some of the breaches identified. We have provided this information to YouTube.

Overall we found that most advertisers responded well to this proactive, advice-based approach, and the ASA will undertake similar monitoring exercises in the future in pursuit of its objective to build a culture of zero tolerance for age-restricted ads appearing in children's online environments.

² <https://www.asa.org.uk/asset/2DED3F6A-9932-4369-AFE72131059E6B8D.D31EF8F7-1CD4-45D4-A547C3418DEE3569/>

³ <https://support.google.com/adspolicy/answer/9919030?hl=en-GB>