Alcohol Ads in Social Media

Regulatory Insight from Platform-submitted Data

An ASA report

ASA

Contents

Executive Summary

Background

- The Advertising Standards Authority (ASA) independently administers the UK Advertising Codes, which are authored by the Committees of Advertising Practice (CAP), ensuring advertising remains responsible and benefits people, business and society in general.

- The ASA's 'More Impact Online' strategy[1] commits it to proactively police online environments to ensure, among other things, that age-restricted ads (for example, ads for gambling, alcohol etc.) are not directed at children in breach of Code rules.

- The ASA holds advertisers primarily responsible for complying with the Code rules because they exercise primary control over the creative content, media placement and audience targeting of their ads. Online platforms and other parties involved in preparing or publishing ads also accept an obligation to abide by the Code.

Targeting age-restricted ads away from children

- In the light of wider developments, for example the Age Appropriate Design Code[2], it is now more important than ever for online service providers to be confident about which of their users are children in order to help protect them from harm. The ASA welcomes the development of online technologies designed for this purpose.

- For advertising targeting technologies that rely to a greater or lesser extent on the known or inferred browsing interests of online users, the ASA encourages developments to enhance their effectiveness and raise advertisers' awareness of them. These technologies can support advertisers of age-restricted products to narrow their target audience through the selection of audience interests with the important objective of excluding children falsely registered, or otherwise incorrectly inferred to be, 18+ years of age.

- Through CAP Guidance[3] advertisers are advised to make good use of online targeting tools to ensure age-restricted ads are targeted away from children, with the regulatory objective of appropriately limiting children's exposure to these ads. Where children do see ads for alcohol, gambling etc., strict rules on their creative content ensure they do not unduly appeal to or exploit the vulnerabilities of children or young people.

- Options available to advertisers include targeting online audiences on the basis of their registered or inferred age, location and, of particular relevance to this report, their online browsing interests; in other words, users' interests in, for example, fashion, cars, gardening, financial planning etc.

- Making good use of audience interest data is important because it can help advertisers to target age-restricted ads away from the social media accounts of children who are

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[1] https://www.asa.org.uk/resource/more-impact-online.html
[2] https://ico.org.uk/for-organisations/guide-to-data-protection/ico-codes-of-practice/age-appropriate-design-code/
[3] https://www.asa.org.uk/resource/children-age-restricted-ads-online.html

registered as, or incorrectly inferred to be, 18+ years old. Unless corrective action is taken to address this age inaccuracy, child account holders may subsequently be exposed to age-restricted ads for alcohol, gambling etc, on the basis that they are registered or inferred to be adult. (Depending on the circumstances, corrective action might be undertaken by the account holder, platform or advertiser).

- In 2013, the ASA monitored the social media use of 24 children aged between 11 and 15[4]. Ten had falsely registered on social media platforms with the effect that, in 2013, their age was indicated as being 18 or older. During the monitored period, each of those children received at least one age-restricted ad to their personal social media accounts. None of the children who had registered with their correct date of birth (identifying them as a child) received an age-restricted ad to their accounts.

  As part of its ongoing commitment to proactively police online environments, the ASA undertook this project on alcohol ads in social media. The project focuses on audience 'interest' options selected by alcohol brands when targeting their ads in logged-in social media and it assesses whether the selections made are in keeping with the letter and spirit of the Code's targeting restriction and, specifically, CAP Guidance on Children and Age Restricted Ads Online.

ASA information request to social media platforms

- Through a landmark information request[5] to the seven social media platforms most popular with children in the UK[6], the ASA requested audience interest data selected by alcohol brands to inform the targeting of their ads on the platforms.

- Platforms are in the unique position of holding reasonably comprehensive, sector-specific data of this type, which has considerable regulatory value to the ASA in protecting consumers online.

- Five platforms held and submitted the data covering the requested period (1 February to 31 March, 2020). Two platforms reported that they did not carry alcohol ads over this period.

Overview of data submitted

- Facebook, Instagram, Snapchat, Twitter and YouTube submitted anonymised data relating, in total, to over 2,000 alcohol campaigns carried by these platforms over the monitoring period.

- TikTok reported that advertising of alcohol products was (and remains) prohibited on their platform. Twitch reported that there were no alcohol brand ads served on their platform during the monitoring period.

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[4] https://www.asa.org.uk/asset/FA34B8D3-2E1B-4A14-892FCECFD09938EB/
[5] ASA Information request appended to this report
[6] Facebook; Instagram; Snapchat; TikTok; Twitch; Twitter; and YouTube

Key findings

- The report presents the key findings against the requirements of CAP Guidance on Age-restricted Ads Online[7]. It identifies examples of good practice, but finds that some alcohol campaigns appear to be falling short in minimising the possibility of children who are falsely registered, or incorrectly inferred to be, 18+ from being exposed to paid-for alcohol ads through their social media accounts.

- The evidence supporting these findings is set out in Section 3 and the findings are set out in Section 4.

Next steps

- The ASA will draw the findings to the attention of the alcohol industry and other relevant industries, calling on them to more strictly observe the requirements of CAP's guidance.

- Importantly, this report does *not* identify if alcohol ads referenced in Section 3 were, ultimately, delivered to children's social media accounts, whether or not those children were falsely registered as, or incorrectly inferred to be, 18+. That will be the focus of the ASA's follow-up monitoring and enforcement project, which is scheduled to begin later in 2021.

- The follow-up project plans to involve a nationally representative panel of children and the use of specialist smartphone software to monitor and identify age-restricted ads distributed to the children's social media accounts. It will allow the ASA to determine targeting breaches, if any, of the UK Advertising Code and take follow-up action against non-compliant advertisers.

Developments in platform policies and tools

- At points, this report references the policies set by social media platforms to restrict alcohol marketing on their sites and the tools they provide to support marketers to reach their target audience (and exclude their non-target audience). The policies and tools reflect those in place over the period covered by the report (1 February 2020 to 31 March 2020 inclusive).

- The reader is advised that these policies and tools are subject to change and the ASA is aware that some social media platforms have updated them prior to the publication of this report.

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[7] https://www.asa.org.uk/resource/children-age-restricted-ads-online.html

Section 1: Introduction

1.1 Background

The ASA strategy, *More Impact Online*[8], commits us to proactively regulate the types of advertising that cause the most detriment to people. This includes focusing on appropriately limiting children and young people's exposure to age-restricted ads for products like gambling, alcohol and foods high in fat, salt or sugar (HFSS). We've set about this task in a number of ways.

In 2019, we published the results of the ASA's inaugural avatar work[9], which identified through tech-assisted monitoring incidences of when age-restricted ads were served in non-logged-in children's websites and children's YouTube channels in breach of the UK Advertising Code. In July, 2021 we used the same technology to assess the extent to which marketers of age-restricted products were targeting their ads to adult audiences and away from child audiences on mixed-age websites and YouTube channels[10].

In August 2020[11], November 2020[12], February 2021[13] and July 2021[14], the ASA published the findings of quarterly CCTV-style monitoring sweeps of websites disproportionately popular with children to identify and tackle age-restricted ads.

The ASA recognises that tech-assisted monitoring and the aggregation and analysis of large amounts of data will often be the most effective way to meet the challenge of regulating advertising in the online space. This is in part because the scale of the internet and advertisers' ability to micro-target audiences demands such an approach, but also because, when it comes to the regulation of age-restricted ads, the ASA does not assume that children will report these ads if they see them or that they will bring them to the attention of a parent / guardian so that they might do so.

The ASA is committed to policing age-restricted ads in online environments popular with children, whether in open-access or logged-in environments. This report uses data provided by social media platforms to gain regulatory insight into whether alcohol brands are taking action to minimise the possibility of children falsely registered as, or incorrectly inferred to be, 18+ years old, being exposed to their ads.

1.2 Regulation and interest-based targeting

To meet the regulatory objective of appropriately limiting children's exposure to age-restricted ads, it is important for advertisers to have confidence in the age-demographic of the audience likely to receive their ads, including in social media platforms.

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[8] https://www.asa.org.uk/about-asa-and-cap/about-regulation/our-purpose-and-strategy.html

[9] https://www.asa.org.uk/news/harnessing-new-technology-gambling-ads-children.html

[10] https://www.asa.org.uk/news/calling-on-advertisers-to-make-better-use-of-online-targeting-tools-to-minimise-children-s-exposure-to-age-restricted-ads.html

[11] https://www.asa.org.uk/news/protecting-children-online.html

[12] https://www.asa.org.uk/news/our-latest-monitoring-sweep-to-tackle-age-restricted-ads-on-children-s-websites-and-youtube-channels.html

[13] https://www.asa.org.uk/news/protecting-children-online-our-online-monitoring-results-for-q4-2020.html

[14] https://www.asa.org.uk/news/protecting-children-online-our-q1-2021-monitoring-results.html

Where platforms require their users to submit date of birth information for account registration purposes, advertisers may place weight, but cannot rely entirely, on this information to ensure their age-restricted ads are targeted at adult accounts only. Uncertainty arises because some children register on social media platforms with a false date of birth which can – at the time of registration or in later years - indicate they are adult i.e. 18 years of age or older (18+) when they are not.

Latest research by Ofcom[15] suggests that more than half of children in the UK have a social media profile *by* the age of 13 (the minimum age of registration on most of the major social media platforms). This suggests that a significant minority of children are registered on social media *before* their thirteenth birthday and, at least initially therefore, are registered with a false date of birth on platforms that require date of birth information. It is possible that some of these children may correct their date of birth details at some point before their actual 18th birthday, but those that do not will be falsely indicated as 18 before they reach that age and, potentially, are liable to receive age-restricted ads e.g. ads for alcohol, gambling etc. through their accounts.

In 2013, the ASA monitored the social media use of 24 children aged between 11 and 15[16]. Ten had falsely registered as being 18+ and each of those children received at least one ad for a gambling, alcohol or slimming product (all age-restricted ads) to their personal social media accounts.

To help advertisers address these circumstances CAP first published in 2017, and then updated in 2021, Advertising Guidance[17] ("the Guidance") which, in effect, requires advertisers to go further than relying only on age-targeting categories provided by platforms. In particular, the Guidance advises advertisers to also target audiences on the basis of their online browsing interests ("interest-based targeting" or "IBT") to lessen the likelihood of age-restricted ads being served to children falsely registered, or otherwise incorrectly inferred to be, 18+. The ASA understands there are a number of ways in which an individual's social media account may be paired with an IBT category. Whilst it is unlikely that a significant proportion of under 18s will seek out and 'like', 'follow' etc. an alcohol brand, gambling operator etc. they may take a browsing interest in sponsored events (e.g. music festivals, sports events) or recreational activities (e.g. bars, nightclubs) etc. associated with those brands and products with the possible effect that their account is paired with these 'interests'.

The Guidance advises advertisers to target ads by including and, where the functionality exists, positively excluding[18] particular IBT categories provided by platforms with the result that an age-restricted ad is more likely to reach adult account holders, rather than under 18 account holders. For example, this could be achieved by positively including an IBT category relating to DIY (an activity of almost exclusive interest to adults) and, where the functionality exists, positively excluding an IBT category relating to teenage fashion (of interest to children and other groups e.g. parents of teenagers).

Our report touches on the unique range and variety of targeting tools provided by participating platforms, which may be used by advertisers to target their age-restricted ads to adult account holders. These tools go beyond just "interests". For example, advertisers may be able to

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[15] Ofcom, Children and parents: Media use and attitudes report 2019 (2019), https://www.ofcom.org.uk/__data/assets/pdf_file/0023/190616/children-media-use-attitudes-2019-report.pdf
[16] https://www.asa.org.uk/asset/FA34B8D3-2E1B-4A14-892FCECFD09938EB/
[17] https://www.asa.org.uk/resource/children-age-restricted-ads-online.html
[18] "Positively excluding" is used in this document to describe situations in which an advertiser has made a targeting choice such that users who have particular interests are excluded from the audience for their ad.

target their ads to account holders who have previously posted or interacted with particular keywords. They may use content-category targeting (choosing the kind of <u>content</u> an advertiser wants its ad to be placed next to or excluded from) or, where available, choose to target their ads to account holders following particular social media accounts and / or followers who are deemed by the platform to be similar to other identified account holders. In some cases, but not all, platforms allow account holders to be excluded from the audience of an ad by these same means. For the purposes of this document and ease of reading all of these targeting options are referred to as interest-based targeting or IBT.

Section 2: Data request to platforms

Through a landmark information request to the seven social media platforms most popular with children in the UK[19], the ASA requested audience interest data selected by alcohol brands to inform the targeting of their ads on the platforms. Platforms are in a unique position of holding reasonably comprehensive, sector-specific data of this type, which has considerable regulatory value to the ASA.

The request sought anonymised data about the targeting choices that alcohol brands used in relation to alcohol advertising targeted at UK logged-in account holders between 1 February 2020 and 31 March 2020 inclusive.

The ASA request was limited to alcohol ads (and not other categories of age-restricted ads) in recognition of the novel nature of the request; a concern to minimise undue burden on the platforms' resources; and, in the expectation that lessons from this exercise would facilitate a broader data request in the future. The focus on ads by alcohol brands again recognised the need to confine the request to an easily identifiable category of advertising. This had the effect of excluding ads featuring alcohol placed by supermarkets and restaurants, for example.

In recognition of the variation in platforms' advertising targeting tools and associated terminology, the ASA requested data on targeting choices made under the following categories:

- Age and other demographic targeting choices[20]
- Interest-based / audience targeting
- Content category targeting
- Any other targeting options provided by the platform (e.g. digital content labelling)

The ASA requested the data to be presented in an Excel spreadsheet and a template spreadsheet for platforms was provided to this end. The request also set out how the ASA proposed to use the data and the likely composition of the final report (this document). A copy of the final letter and template, as sent to platforms, is included in the Annex to this report.

The request was sent to the seven social media platforms most popular with children in the UK. In alphabetical order, they are:

- Facebook
- Instagram
- Snapchat
- TikTok
- Twitch
- Twitter
- YouTube

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[19] Facebook; Instagram; Snapchat; TikTok; Twitch; Twitter; and, YouTube.
[20] Some platforms use interest-based factors with the objective of modelling the actual age of the user.

Section 3: Analysis of data responses by platform

3.1 Summary of responses

In total the ASA received responses from all seven platforms and targeting data from five of them. The data relates to over 2,000 alcohol ad campaigns that ran between 1 February 2020 and 31 March 2020 inclusive.

In the following table and the analysis that follows we quote a number range for the amount of anonymised alcohol brand advertisers and ad campaigns submitted by each platform. We do this for two main reasons:

Firstly, the principal objective of this project is to get an insight into alcohol brand advertisers' use of interest-based targeting tools to minimise their ads' exposure to children who are falsely registered as, or incorrectly inferred to be, 18+ years of age. Whilst it is instructive to know our analysis was based on an assessment of over 2000 ad campaigns, it is not necessary, nor was it an objective of the report, to detail the specific breakdown of those numbers by platform. Secondly, we recognise the potentially commercially-sensitive nature of this data: sensitive for platforms and advertisers alike. On that basis we use a number range approach and, later in the analysis, make reference to percentages, where we feel their use is based on a sufficient amount of source data in order for those percentages to be meaningful.

Platform	Number of alcohol brand advertisers	Number of ad campaigns
Facebook*	[Between 10-20]*	[More than 500]*
Instagram*	[Between 10-20]*	[More than 500]*
Snapchat	[Fewer than 10]	[Fewer than 50]
Twitter	[Between 10-20]	[Between 100-500]
YouTube	[Fewer than 10]	[Fewer than 50]
TikTok	Reported that advertising of alcohol products were prohibited at the time, and over the period, of the request.	
Twitch	Reported that alcohol ads were not served during the period of the request.	

* Instagram is owned by Facebook and the platforms share an ad management tool. Advertisers can choose for their ad campaign to run on one or both platforms. While the number range of ad campaigns are reported separately in the table above, there is significant duplication of ad campaigns and, therefore, brands' targeting decisions in their data.
Additionally, the figures provided for Facebook and Instagram relate to creatives (potentially counting multiple versions of the same ad) which is likely to be a factor in the relatively larger number of "campaigns" reported. Where data from more than one platform is referred to collectively in this report the term "campaigns" is used for ease of reading.

3.2 General observations

- Each platform makes available ad targeting options, which differ from those offered by other platforms, although the options work to the same broad principle and seek to fulfil the same basic purpose i.e. to define the intended target audience.

- For example, some platforms provided data which show that they make available to advertisers and their agencies additional targeting options which relate to their platform users' interests and, if used purposefully, would likely assist advertisers to target age-restricted ads away from children who are falsely registered as, or incorrectly inferred to be, 18+ years old. Specifically:

  o Facebook / Instagram make available to advertisers the ability to use interests in a way that can broaden or narrow the audience pool. By default, every interest category added will expand the audience. Facebook and Instagram also allow advertisers the option of targeting only the overlap of selected interests, or to exclude audience members on the basis of their interests. As with other platforms, regardless of the interest targeting combinations used, delivery of the ad respects the demographic targeting selected by the advertiser.

    Snapchat makes available to advertisers the functionality to target their ads to users that the platform has inferred have an interest in any of its 122 interest-based lifestyle factors ("Lifestyle Categories"). Users are, themselves, also able to select their Lifestyle Categories in-app. This is in addition to the interest-based targeting Snapchat uses as part of its age targeting. Additionally, Snapchat factors in Lifestyle Categories data in addition to users' self-declared date of birth, to infer users' likely actual ages.

  o Twitter makes available to advertisers the functionality to target their ads to users who have posted keywords or interacted with variations on particular keywords ('broadmatch keywords') and those who are 'followers of', or 'similar to followers of', particular Twitter accounts.

  o YouTube makes digital content labels available to advertisers which allow them to show ads against certain types of content e.g. content suitable only for mature audiences.

- In terms of the quality and presentation of the data submitted by the platforms, there were differences between the individual platforms, with some providing concise data as set out in the template provided and some providing very detailed, additional information around IBT as well as other types of targeting techniques used by advertisers (e.g. whether the advertisers had used URL exclusion lists).

3.3 CAP Guidance: Managing risk in the targeting of age-restricted ads

- CAP Guidance on 'Children and age-restricted ads online'[21] advises about the relative risks of targeting age-restricted ads to different audience age profiles. The closer the age profile of the target audience is to the age at which CAP's media placement

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[21] https://www.asa.org.uk/resource/children-age-restricted-ads-online.html

restriction is set (i.e. to exclude u16s or u18s from the audience) the more care advertisers should take when targeting age-restricted ads. For example, an alcohol advertiser that is actively choosing to target an age profile of 18–23-year-olds will need to exercise considerably more care when selecting additional targeting choices than would an advertiser targeting a 25+ age profile.

- If an advertiser using IBT wishes to target an ad on the basis of an interest (e.g. football) that, whilst having a broad age appeal, is also likely to strongly appeal to people under the protected age (e.g. 17 and younger), they should (where the functionality is available) combine this with the selection of additional interest factors (e.g. house-buying) that are likely to have the effect of excluding the protected age group from the audience.

- The guidance acknowledges that some age-restricted ads will, by nature of the product, be targeted at an older adult audience and, therefore, attract a lower risk of exposure to the protected audience. For example, an ad for of an expensive whisky is likely to be targeted at an age-group of adults more senior in age. Here, advertisers may naturally choose interest factors e.g. insurance products, family holidays or readers of broadsheet newspapers, which would have the effect of excluding children from the audience who are falsely registered as, or incorrectly inferred to be, 18+.

3.4 Platform functionality for interest-based targeting

- In the first instance, CAP guidance requires - where the functionality exists - advertisers to apply an appropriate age-target (e.g. 16+, 18+) to their age-restricted ads; this is the minimum targeting requirement. (In terms of their creative content, those ads must also not appeal particularly to children or use techniques that exploit their credulity, inexperience etc.)

- From our assessment of the information submitted, it was not always apparent whether platforms made available, and advertisers used, functionality to offset the advertisers' selection of 'broad interests' (relevant to adult and child users) with interests relating to adults only. Where this functionality is available, CAP Guidance advises advertisers that select a broad audience interest (e.g. football) to lessen the chances of children being exposed to an age-restricted ad by selecting an interest likely to relate to adults only (e.g. gardening). Such functionality would, in theory, allow only audience members with an interest in football and gardening to be targeted (effectively excluding children), as opposed to football or gardening (potentially capturing children who have an interest in football).

- We subsequently understood that Facebook and Instagram, for example, provided such functionality i.e. allowing advertisers to broaden or narrow the audience pool depending on the IBT configuration the advertiser has chosen and Snapchat plans to allow advertisers to exclude audiences on the basis of interest categories in 2021.

- Where such 'interest-offsetting' functionality is not available, marketers of age-restricted ads are more reliant on platforms' provision of age-category data (e.g. 18+) to offset their selection of broad audience interests (e.g. football). We also understood that platforms offer additional functionality to assist advertisers to minimise the chances of children (who are falsely registered as, or incorrectly inferred to be, 18+ years of age) from being exposed to age-restricted ads in logged-in social media. For

example, some platforms allow advertisers to positively exclude audiences by interest category e.g. excluding those with an interest in teenage fashion.

- In the light of wider legislative developments and the growing demands of brands and publishers alike, it is now more important than ever for online service providers to be more confident about which of their users are children in order to protect them from harm. The ASA welcomes the development of platform-specific and other provider technologies designed to protect children online.

- For advertising targeting technologies that rely to a greater or lesser extent on the known or inferred interests of online users, the ASA encourages developments to enhance their effectiveness and raise advertisers' awareness of them.   These technologies can support advertisers of age-restricted products to narrow their target audience through the selection of audience interests with the important objective of excluding children falsely registered, or otherwise incorrectly inferred to be, 18+ years of age.

3.5 Facebook

Submission overview

- Facebook (and Instagram) provided data on alcohol brands' use of location, gender and age targeting, and details of interest-based targeting categories that alcohol brands had selected to include or exclude user groups to refine their target audience.

- Their submission did not provide, and we did not request, a full list of possible interest-based targeting categories as the vast and changing nature of potential interest selections on Facebook make this impractical.

- Facebook provides age-targeting capability to exclude minors in the relevant country, for example, under-18s in the UK. Furthermore, Facebook (and Instagram) provide functionality which can be used by advertisers to positively exclude children falsely registered as, or incorrectly inferred to be, 18+ years of age, using interest categories likely to favour an adult audience, as advised by CAP Guidance.

- By default, every interest category added will expand the audience. Facebook also allows advertisers the option of targeting only the overlap of selected interests, or to exclude user groups from their target audience according to their interests. However, the data provided did not readily indicate whether the selected "included interests" in each case were used to expand the audience or to restrict it via the overlapping of selected interests. Given the default described at the beginning of this paragraph, we have therefore analysed the data on the assumption that it was used to expand the audience in each case.

Observations on the data

- The anonymised data submitted by Facebook (and Instagram) relates to individual ad creatives rather than the broader individual campaigns. Some advertisers will use multiple versions of an ad (for example, different formats or sizes) as part of a particular campaign and may choose to either keep the targeting the same across all, or differentiate between the creatives. As a result, the number of ad "campaigns"

(individual ad creatives, more precisely) reported by Facebook and Instagram were comparatively higher than the ad campaigns reported by other platforms.

- The data covers activity of between 10-20 alcohol brands placing more than 500 individual alcohol ads over February and March, 2020. Of those ad campaigns, 58% made use of IBT and 42% did not.

- Use of IBT was, in fact, less common in those campaigns which targeted users with a minimum age of 18. 49% of campaigns were targeted to those with a minimum age of 18 and, of those, 27% only used IBT. This is a significant finding given the weight the Guidance attaches to supplementing age-category targeting with interests that are likely to favour an adult audience, especially where the age category targeted (18+) abuts the protected age group (17 years old and younger).

- All of the ad campaigns were targeted using 18+ age-demographic data which would, all other factors being equal, have the effect of excluding u18s who are registered with correct ages.

- 48% of ad campaigns were targeted to users registered as being 25+ (with 88% of them using IBT). The choice of 25+ is seven years older than the minimum age (18) of the audience to which an alcohol ad may be targeted. By choosing 25+, the advertiser would automatically exclude children falsely registered or inferred to be 18-24, whereas by choosing 18+ those children would not be automatically excluded. Some campaigns were targeted at audiences aged 35+ or 40+, which would exclude children falsely registered or wrongly inferred to be 18-34 and 18-39, respectively. It stands to reason that targeting an audience aged 40+ is likely to exclude more children falsely age-registered as, or incorrectly inferred to be, 18+ than targeting an audience aged 18+.

- We noted, from the IBT selections provided, that prominent rugby and horseracing events took place during the monitoring period. These events, which are traditionally associated with spectators drinking alcohol, appeared in the data.

Interest-based targeting (IBT) approaches in the data

IBT: Inclusion vs exclusion

- From our assessment of the information submitted, Facebook and Instagram appear to be the only platforms which made available during the monitoring period functionality to allow advertisers to positively exclude users from an audience on the basis of their interests. However, of the ad campaigns assessed on those platforms, less than less than 5% clearly and actively excluded audiences by interest. This is a potentially significant finding given the weight the Guidance attaches to supplementing age-category targeting by including interests that are likely to favour an adult audience.

- See also 'Use of positive exclusions' later in this section.

IBT likely to favour an adult audience

- A number of ad campaigns were targeted to older age groups e.g. 25+, and were supplemented with IBT, which, in general terms, are likely to favour an adult audience. For example:

- o one campaign predominantly targeted those aged 40+ and included the interests: *blended whiskey, Scotch whisky and whisky*.
- o one campaign targeted those aged 35+ with the interests: *Japanese whisky / scotch whisky / single malt Scotch / single malt whisky*.
- o one campaign targeted those aged 25+ with the interests: *Ascot Racecourse / At the Races / Cheltenham Festival / Cheltenham Gold Cup / Cheltenham Racecourse / Grand National / Racing UK*.

In instances where an older age group is targeted and interests are selected that are likely to favour an older age group, the need to exclude user groups from the target audience on the basis of interest categories is likely to be less of an issue. None of these campaigns positively excluded any interests.

IBT likely to favour a younger audience

- CAP's Guidance emphasises that the closer the age profile of the target audience is to the age at which CAP's media placement restriction is set i.e. to exclude u16s or u18s, the more care advertisers should take when targeting age-restricted ads.

- We observed that 36% of ad campaigns were targeted (legitimately) to those with a minimum age of 18+, but in these cases no IBT was used. These campaigns appear, therefore, to have been more reliant on platforms' provision of age-category options than advised by the CAP Guidance. (Note: the data reviewed does not show whether the targeting of the ads, referred to in the report, benefit additionally from the use of proprietary brand data e.g. first party data from the brands' owned media or customer data (which may help to better determine or infer age), further reducing the risk of exposure to children who are falsely registered as, or incorrectly inferred to be, 18+.)

- There are also some more problematic examples where the IBT interests selected by alcohol brands are, individually and in combination, likely to map to the interests of a significant number of children falsely registered as, or incorrectly inferred to be, 18+:

  - o one campaign targeted its alcohol ads to those aged 18+ and selected the interests: *hip hop music*, *pop music* and, in some cases, *fashion design*. The campaign did not positively exclude audience members through the selection of interests, which may have reduced the possibility of children falsely registered as, or incorrectly inferred to be, 18+ years old from receiving the ads.

IBT approaches which include older audience and wider audience interests

- A campaign was targeted using interests that would appear to favour a more adult audience

  - o those aged 25+ with the interests: *contemporary art / cultural heritage / gin / gin and tonic / horticulture / vodka*

The inclusion of "contemporary art", "cultural heritage" and "horticulture" are more likely to relate to adult interests. It should be noted, however, that irrespective of

whether or not users share the aforementioned other interests, the ad would also be delivered to a target audience of users ages 25+ with an interest in vodka,

The ASA understands that there are a number of ways in which an individual's social media account may be paired with an 'interest category'. Whilst it is unlikely that a significant proportion of under 18s will seek out and 'like', 'follow' etc. an alcohol brand, they may take a browsing interest in sponsored events (e.g. music festivals, sports events), recreational activities (e.g. bars, nightclubs) etc. associated with an alcohol brand with the possible effect that their account is paired with these 'interests'. It is arguably more incumbent, therefore, on certain alcohol categories and brands to take more care in using age targeting tools to minimise the risk of their ads being delivered to the social media accounts of these children. It is fair to say that targeting an alcohol ad to users aged 25+, as opposed to 18+, is likely to assist in reducing these children's exposure to alcohol ads.

- It is worth considering this example also:

  o two campaigns targeted those aged 25+ with a selection of interests focused on *whisky, business travel* and a wide selection of luxury car brands*.*

  Again, the overall *impression* is a selection of interests that, in aggregate, are likely to favour an adult audience. However, the ad will reach everyone with a reported age of 25+ and an interest in 'alcoholic beverages', which, because of factors set out above, may be be paired with the accounts of children falsely registered as, or incorrectly inferred to be, 18+ years of age. Again, targeting an age profile of 25+, as opposed to 18+, is likely to minimise further the possibility of these children receiving the ad.

IBT: general targeting

From our assessment, we observed that, often, the interest-based targeting approaches used by alcohol brands in many of the ad campaigns cannot neatly be categorised as likely to favour particular audience age demographics:

o one campaign targeted those aged 21+ with the interests: *Marathons / Running.*

o one campaign targeted those aged 18+ with the interests: *Unique Gifts / Whisky.*

o one campaign targeted those aged 18+ with the interests: *Saint Patrick's Day / St. Patrick's Day Countdown*

o one campaign targeted those aged 18+ together with a broad range of interests related to sport, sports channels and rugby.

o one campaign targeted those aged 25 and over with the interests: *Adventure travel / Alcohol / Art exhibition / Art museum / Artist / Bars / Brunch / Cocktail / Contemporary art / Drinking/Eating / Environmentalism / Ethical consumerism / Exploration / Food festival / Foodie / Gin / Gin and tonic / Local food / Modern art / Nightclubs / Nightlife / Parties / Performing arts / Secret Cinema / Secret London / Street food / Sustainability / Theatre / Time Out (magazine) / Vacations.*

o one campaign targeted those aged 28 and over with the interests *Alcohol / Alcoholic beverages / Art film / Cocktail / Drinking / Expensive / Expensive Taste / Luxury / Luxury goods / Movies / Music / Nightclubs / Nightlife / Photography / Rum / Shopping / Visual arts / Wine & Spirit.*

Use of positive exclusions

- As noted above there appears to be very little use of positive exclusions in the data. The notable example is the two different campaigns, by the same advertiser, below:

  a. In the first set the advertiser targeted those aged 18+ with the interests *BBC Sport*, *BT*, *Sky Sport* and numerous and other interest categories focused only on rugby.

  b. In the second set, targeted at those aged 18+, the advertiser positively excluded the interests listed in the point above and included the following interests: *Bars / Drinking / Nightlife / Online gambling / Parties / Sports betting.*

- The targeting described in (a) features interests that are likely to have a general appeal, rather than an appeal specifically to younger audiences.

- The positive exclusions used in (b) seem designed to clearly differentiate the audience from that of (a) rather than to restrict the ads to older users. The use of interests likely to appeal strongly to some people under 18 (nightlife / bars etc.) particularly in combination with the lowest allowable age restriction (18+), increases the risk that the ads will have been served to children falsely registered as, or incorrectly inferred to be, 18+.

3.6 Instagram

- The data submitted by Instagram covers activity by between 10-20 alcohol brands who placed more than 500 ad campaigns over the monitoring period. IBT was used in 58% of cases and not used in 42% of cases. A quarter of the advertisers did not use any IBT across any of their campaigns.

- As with Facebook, IBT is less often used with alcohol ads targeted at a minimum age of 18+, which again appears more reliant on the platform's provision of age-category data than strictly advised by the CAP Guidance. Of the campaigns assessed, 51% were targeted to those aged 18+. Of that subset 30% used IBT and 70% did not.

- 46% of campaigns were restricted to those aged 25+, excluding any children falsely registered as being 18-24 over the period of the monitoring. 86% of these campaigns used IBT while 14% did not.

- However, with many of the same ad campaigns running on both Facebook and Instagram, the data for Instagram largely duplicates that of Facebook, and is for that reason mostly discussed in the 'Facebook' section above. There were two notable campaigns which appeared on Instagram alone:

  o One advertiser which targeted individuals aged 24-44 with the interest *Love Island [2015 series]*. The age profile, at 24+ is fractionally younger than the 25+

restriction seen elsewhere but excludes children falsely registered to be, wrongly inferred as, 18-23. However, subject to any other audience limitations imposed by the advertisers, this particular ad may have been delivered to these children with an interest in TV show, Love Island (a programme popular with older children and teenagers).

  o The same advertiser targeted individuals aged 25+ with the interests *BBC Radio 1 / Cheltenham Racecourse.* Clearly the use of the 25+ age restriction and the interest "Cheltenham Racecourse" are likely to be helpful in refining the audience away from children falsely registered or wrongly inferred to be 18+. However, it also targets those with an interest in Radio 1 whose target listeners are likely to be those in the 15-29 age bracket. There is therefore some risk that this ad could be served to u18s who were falsely registered as, or wrongly inferred to be, 25+, whose accounts have been paired with the interest 'Radio 1'.

3.7 Snapchat

Submission overview

- Snapchat submitted age, gender and location-based targeting data with details of interest-based targeting categories that alcohol brands had selected to refine their target audience. Snapchat does not permit age targeting solely based on a user's declared age. The age targeting for the data submitted was based on inferred age and excluded users with a declared age below the age of 18.

- Snapchat explained that it used a number of factors, in addition to self-declared date of birth, to infer users' likely actual ages. This includes consideration of users age profile against 122 interest-based lifestyle factors ("Lifestyle Categories"), as well as other interest-based factors. It was those inferred ages that dictated which age brackets they were placed in for the purposes of being served ads. In addition to Lifestyle Categories forming part of Snapchat's inferred age targeting, advertisers can select lifestyle categories to target users that have an interest in one or more of those categories.

- We understood that it was possible for advertisers to target users on Snapchat through positive inclusion of these categories. At the time of submission, it was not possible for them to positively exclude audiences on the basis of these categories. We understood that Snapchat plans to make this functionality available in 2021.

- The submission also provided information about whether Custom Audiences (for example, targeting based on proprietary data provided by the advertiser such as email lists or device IDs) had been used. Snapchat does not have visibility of the detail of this data.

Observations on the data

- The data submitted showed that fewer than 10 alcohol brands placed a total of fewer than 50 ad campaigns on Snapchat during the monitoring period.

- From the data submitted, we observed that all the alcohol campaigns excluded u18s from their targeting, which we understood from Snapchat also included those whose

age was categorised as 'unknown' (because the users' age could not be modelled by Snapchat with an appropriate degree of confidence).

- All of the campaigns were targeted to those aged 18+ with only a minority making use of specified IBT, indicating the alcohol brands were – in most cases – more reliant on the platforms' provision of age-category data than advised by the CAP Guidance.

- CAP's guidance effectively requires that IBT is used in addition to age-based targeting and advises that the closer the age profile of the target audience is to the age at which CAP's media placement restriction is set i.e. to exclude u16s or u18s, the more care advertisers should take when targeting age-restricted ads.

- In the campaigns where advertisers opted to layer additional targeting towards users that had an interest in specific Lifestyle Categories, we assessed it was done so in a very limited way with each campaign including one category only. In one case, the interest chosen was *burger lovers*; an interest likely to be shared by subsets of adults and children on Snapchat. Subject to any other audience limitations imposed by the advertiser, this particular approach is likely to be at variance with CAP Guidance.

- In other cases, the interests chosen were *liquor and spirits drinkers* and, separately, *beer drinkers*.

- About a third of campaigns used the Custom Audiences option; as noted above, Snapchat does not have visibility of advertisers' Custom Audiences data. We understand this option may involve data collated by the brands themselves e.g. customer data, which, when used for targeting purposes, may reduce further the risk of exposure to children who are falsely registered as, or incorrectly inferred to be, 18+.

3.8 Twitter

Submission overview

- Twitter submitted anonymised data covering activity by between 10-20 alcohol brands which, between them, placed more than 100 ad campaigns.

- Information on location, gender and age-based targeting was provided. The submission also provided details of interest categories used by alcohol brands in targeting the ads. Like Snapchat – over the monitoring period - such categories can only be used on Twitter to positively *include* target audiences, not positively *exclude* groups of users from the target audience. The submission did not set out a full list of possible interest-based target groups.

- Twitter makes available to advertisers a keyword exclusion tool as well as a custom audiences' exclusion tool. We also understood the platform operates its own age-gating system for age-restricted ads separate to the use of interest-based targeting by advertisers.

- Of note, we observed that in addition to location, gender and age-based targeting options, strict interest categories are not the only, or even the primary, targeting option used by alcohol advertisers on Twitter. The data shows the existence and extensive use of other targeting options such as broadmatch keywords (where ads are targeted

to users who have engaged with words identical or similar to a particular keyword). It also shows the use "followers of" and "similar to followers of" options, whereby advertisers can identify a target audience that is identical or similar to those that follow another Twitter account.

- 96% of campaigns used at least one type of interest, keyword or follower targeting options. Of those 39% did not make use of interest category targeting specifically but did make use of the other targeting methods.

- Sometimes actual account names (Twitter 'handles') are included as broadmatch keywords instead, or as well as, in the (similar to) followers of categories.

- To the best of our knowledge, use of these more extensive targeting options can support the advertiser in reducing the likelihood of children falsely registered as, or incorrectly inferred to be, 18+ from being exposed to alcohol ads. Like the use of interests, these options can shape the overall targeting picture to favour an audience that is more likely to be comprised of adults.

- The effectively unlimited number of targeting options provided by the use of keywords, 'followers of' and 'similar to followers of' creates a limitless number of targeting option combinations, which do not lend themselves to easy summary or assessment against the targeting advice presented in CAP Guidance.

- As with the Facebook and Instagram data, targeting choices included many references to international rugby and horseracing events (events traditionally associated with spectators drinking alcohol) that were due to occur during or soon after the monitoring period.

Observations on the data

- 9% of campaigns run by just under a half of the alcohol brands did not appear to specify any demographic age targeting at all, which is of considerable concern. From our assessment, these brands would appear to have placed undue weight on factors not limited to the general audience age profile on Twitter, any age-gate placed by Twitter or them on their account and, where used, the use of interest categories and other targeting options to ensure alcohol ads are not being delivered to users aged 17 or younger.

- The extent to which other targeting types were used in these campaigns varied. Six campaigns used no targeting at all apart from specifying the UK or one of its nations in their geographic targeting. Others made use of one or more of the broadmatch keywords and "Similar to followers of…" functions to variously reach those interested in particular alcoholic drinks and a Scottish Premiership football club. Fundamentally, though, selecting adult age categories should be regarded as an essential starting point in all instances of serving age-restricted ads. Without doing so, the use of other targeting methods have to work incredibly hard to mitigate the possibility of ads being served to u18s.

- The remaining 91% of alcohol campaigns, all specified age targeting to adults. Of those:

- About a third were targeted to those aged 18+ and about two thirds were targeted to those aged 25 or over. Alcohol brands' use of audience targeting options, and the extent of the targeting variables selected in each case vary widely depending on the campaign. A very small number of campaigns were age-targeted to audiences from an age between 19 to 24:

- Of the third of campaigns targeted at those aged 18+:
  - About one tenth used IBT categories <u>and</u> some form of other targeting options (e.g. keywords / 'similar to followers of' etc.)
  - The remainder used targeting options other than IBT categories (e.g. keywords and similar to followers of).

- The extent to which targeting options were used varies significantly. For example:

  - one advertiser ran a campaign targeted at those aged 18-49 in Scotland and selected no interest-based targeting. They selected the keywords *light lager* and *lager* and appeared to use no other targeting criteria.

  - one advertiser ran a campaign targeted at those aged 21+ and selected no interests, but targeted the keywords *pubs / training / hospitality / [real ale brand] / hospitality training* and, under the "similar to followers of" option, identified a variety of pub chains and real ale accounts.

  - one advertiser ran a campaign targeted to those aged 35+ with no interest category targeting but with 95 broadmatch keyword selections and a further 92 accounts listed in "similar to followers of" option; all of these were focused on fine wine.

  - one advertiser had as many as 379 accounts listed in the 'similar to followers of' targeting option which illustrates the extent to which this particular functionality can be used and the obvious reach it affords as a result.

  - One campaign was targeted at those aged 18-49 and only to the alcohol brand's own followers[22]. It did not select any IBT, but selected the broadmatch keywords: #Glasgow / lager and hashtags identifying a prominent superhero character. Subject to any other audience limitations imposed by the advertiser, this particular ad may have been delivered to children falsely registered as, or wrongly inferred to be, aged 18-49 with an interest in the superhero character (a character popular with children and older teenagers). This targeting approach is at variance with the CAP Guidance.

3.9 YouTube

Submission overview

- Based on the data submitted, we understood YouTube provides advertisers with the functionality to target ads based on demographic targeting data relating to age, gender and parental status. We understood that advertisers could exclude audience members on the basis of their demographics and we observed from the data that users

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[22] We understood advertisers on Twitter can prohibit under-age users from following their account (age being determined by the birth date listed on the profile).

whose age is "unknown" to YouTube (because insufficient information was available to YouTube to know or infer their age) were excluded from the audience of the alcohol campaigns.

- Like Facebook and Instagram, YouTube's submission did not include a full list of possible IBT categories; the number of those categories and the fact they are often auto-generated by the platform may make providing a full list unrealistic.

- YouTube informed us that it **permits alcohol ads to be delivered only to signed-in users with a declared age of 18+ and not in or around content labelled as being made for kids or suitable for general audiences.** We understood that advertisers could select further content categories exclusions to support the audience targeting of their ads. Additionally, we understood YouTube functionality allows advertisers to use placement, topic and keyword exclusions to support advertisers in their targeting of ads.

Observations on the data and targeting approaches

- The data provided relate to fewer than 50 campaigns by fewer than 10 advertisers. The campaigns were targeted to those aged 18+ and, separately, some others to those aged 25+. Significant observations from that data follow below:

  o Two campaigns were targeted to all adult age groups (i.e. signed-in users registered as, or otherwise inferred to be, 18+ years old) and included the IBT category: '*Media & Entertainment – Movie Lovers'*. One of these campaigns made further use of content targeting options by positively excluding the ad from being placed around content labelled as '*Children's Literature'*. We understood that this would have the effect of excluding from the audience of the ad, users who have an interest in 'children's literature', some of which may be children falsely registered / wrongly inferred as 18+ years old. Neither of the campaigns made use of other placement or keyword exclusion lists.

  o One campaign was targeted only to those in the 25-34 and 34-44 age brackets; another was targeted to all adult age groups (i.e. 18+ years of age). Neither campaign used IBT categories, content category topic targeting, placement or keyword exclusion lists to reduce the likelihood of users incorrectly registered as, or inferred to be, adult in age from being exposed to the alcohol campaign. From our assessment, the approach used for this campaign by the alcohol brand appears to be more reliant on platforms' provision of age-category data than advised by the CAP Guidance.

3.10 Data limitations

- While the information submitted by five social media platforms provides some useful insights into the use of IBT across alcohol ad campaigns during the analysis period, there are limitations to this data and the conclusions that can be drawn from it.

- There were material differences in the data submitted by the individual platforms, such as the submission of data relating to individual ad creatives versus data relating to ad campaigns (which are likely to comprise individual ad creatives).

- We did not seek any independent verification of the data collected.

- The data relates to alcohol brand advertisements served during a two-month period and therefore provides a sample of activity, which is likely to vary significantly at different times of the year. As such, this analysis provides a snapshot of activity during a short, specific period of time.

- Importantly, the data received on over 2,000 campaigns does not provide a measure of the volume of ads served across the analysis period nor does it provide a measure of audience exposure to the ads served.

Section 4: Key regulatory findings

Owing to the limitations of the evidence requested, the ASA cannot know if the targeting selections of alcohol brands, during the monitored period, resulted in their alcohol ads being delivered to the social media accounts of children, including those falsely registered as, or incorrectly inferred to be, 18+.

Notably, the evidence is limited to the brands' selection of audience targeting options known to and made available by the platforms; for example, options relating to age, location, interest-based targeting categories, audience matching, content targeting etc. The accuracy of the data and the effectiveness of the functionality underpinning these targeting options cannot be determined on the basis of the evidence assessed.

Moreover, the ASA does not know if any of the brands used other data e.g. first party data from the brands' owned media and proprietary customer data (which my help to better determine or infer age) to lessen the possibility of their ads being delivered to the accounts of children falsely registered as, or incorrectly inferred to be, 18+.

However, the ASA is able to assess whether alcohol brands' targeting selections (to the extent that they are held by platforms and have been shared anonymously with the ASA) meet the requirements of CAP Guidance on Age-restricted Ads Online[23]. Below, we present key elements of the guidance (general and specific); a summary evidence of relevance to each element; and, resulting ASA compliance advice for alcohol brands and, indeed, other marketers of age-restricted ads:

General elements of guidance:

CAP Guidance	**Select or deselect interest-based factors – in combination with age-targeting tools – to help remove children from a target audience.**
Evidence summary	Age demographic targeting is used in almost all campaigns. However, in the largest datasets this was combined with interest-based targeting in just over half of campaigns only. The actual targeting approaches seen vary significantly.
ASA Advice	While the observed use of interest-based targeting by alcohol marketers is encouraging, the evidence suggests that more alcohol marketers should be making use of it (and other targeting tools and techniques) to reduce the likelihood of their ads being seen by children incorrectly registered as, or wrongly inferred to be, 18+.

CAP Guidance	**Use as many audience data sources and/or targeting tools as are available for a given platform.**
Evidence	The evidence shows platforms have a variety of available targeting tools and techniques which can be used to refine the target audience in a way more likely to favour adults, as envisaged in the Guidance. Those methods differ between

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[23] https://www.asa.org.uk/resource/children-age-restricted-ads-online.html

	platforms and are not simply confined to a pre-determined list of interest-based targeting categories. For example: keyword matching, audience matching and content targeting are all widely available and may support the aim of excluding children from the target audience. Platforms generally also make available options to target based on proprietary data held by advertisers although the use of this was not assessed in this review.
ASA Advice	In the light of the evidence, marketers are advised to consider whether they can make use of additional targeting tools and data, beyond just audience interests, to help refine their target audience with the objective of lessening the possibility of children incorrectly registered as, or wrongly inferred to be, 18+ fseeing their ads.

Specific elements of guidance:

CAP Guidance	**Targeting on the basis of age data alone – selecting a specific adult demographic and/or excluding younger age groups – is unlikely to be sufficient.**
Evidence	A handful of ad campaigns did not appear to specify any demographic age targeting at all, which is of considerable concern. A significant proportion of campaigns were, at variance with the guidance, seemingly targeted on the basis of age data alone, with no other observed targeting methods employed to minimise the possibility of the alcohol ads being delivered to the accounts of children falsely registered as, or incorrectly inferred to be, 18+.
ASA Advice	Marketers must ensure they always use age demographic targeting in combination with additional targeting techniques and tools to lessen the possibility of children incorrectly registered as, or wrongly inferred to be, 18+ seeing their ads.

CAP Guidance	**The closer the age profile of the audience targeted by the advertiser is to the protected age group (e.g. u18s), the more care marketers should take.**
Evidence	The evidence shows that there are many instances where alcohol ads are restricted to older adult age segments. On Facebook almost half of campaigns were targeted at those aged 25+. However, at variance with the guidance, interest-based targeting is used far less often in the targeting of lower adult age segments (e.g. 18-25). That is of concern given the importance the Guidance places on the use of IBT when targeting the youngest adults. Of note, we observed that alcohol ads were, variously, targeted at different age groups e.g. 25+, 40+. It stands to reason that targeting an audience aged 40+ is likely to exclude from the recipient audience more children falsely registered as, or incorrectly inferred to be, 18+ than targeting an audience aged 18+.

ASA Advice	Marketers targeting those in the lowest adult age segments must place an increased focus on using interest-based factors and do so in a way that is likely to minimise the likelihood of their ads being served to those falsely registered or incorrectly inferred to be u18.

CAP Guidance	**Where a platform facilitates it, marketers should not select, and should actively deselect, interests very strongly associated with a protected age group.**
Evidence	Encouragingly, we saw very few instances of interests being selected that are likely to be very strongly associated with u18s. Where functionality is provided to allow advertisers to positively exclude audiences based on particular interests, we saw limited evidence of its use and, where it was, it was not done so in a way that was likely to exclude children falsely registered as, or incorrectly inferred to be, 18+.
ASA Advice	Marketers should give much more consideration to the use of positive exclusions of interests (or keywords) likely to be strongly associated with u18s than they do at present when they are placing ads on platforms where that functionality exists.

CAP Guidance	**Marketers should be cautious about targeting an ad on the basis of an interest that has a potentially broad age appeal…. They should use additional interest factors, where their use has effect of excluding the restricted age group from the audience; for example, by targeting those interested in both 'football' (an interest factor with a very broad age appeal) and 'house-buying' (an interest that is biased strongly to adults).**
Evidence	As a result of this review our understanding is that the selection of included factors is, in practice, generally additive in nature and each new interest adds more people to the audience. So, if an interest is associated with u18s (e.g. teenage fashion), platform functionality is, in many cases, not available or not used by advertisers with the result that that interest can be offset by including another interest (e.g. pension planning), which is likely to appeal to adults only. Because of that and because of the broad range of interests that are often selected in the same campaign, the data shows that the overwhelming majority of interest-based targeting choices, used by alcohol brands over the monitoring period, did not obviously favour an adult age group. For example, interest selections might include types of sport (e.g. football, rugby), and other broad interests like parties, nightlife and vacations or cultural events like St Patrick's Day, which are likely to be of interest to children who are falsely registered as, or incorrectly inferred to be, 18+ years of age. These campaigns are placing more reliance on the platforms' provision of age-category data to offset their selection of broad audience interests than envisaged by CAP's guidance.

ASA Advice	Marketers should ensure they do not select interests strongly associated with u18s and also use other targeting options that will have the effect of refining the audience e.g. through use of positive exclusions, custom audiences etc. By doing so, they will reduce the risk of their ads being delivered to children falsely registered as, or incorrectly inferred to be, 18+.

CAP Guidance	**Where a platform facilitates it, marketers are encouraged to also use external data to further reinforce targeting decisions. For example, data on whether an individual holds a store or credit card is likely to be considered a robust indicator of their age.**
Evidence	The data reviewed does not show whether the targeting of the ads, referred to in the report, benefit additionally from the use of brand proprietary data e.g. first party data from the brands' owned media and customer data, which would likely further reduce the risk of exposure to children who are falsely registered as 18+ years old.
ASA Advice	Marketers should consider what additional, proprietary data might assist them in ensure that their ads are targeted to those aged 18+.

CAP Guidance	**Some ad placements will attract a low risk. For example, a marketer of an expensive whisky or financial market spread-betting product might target an age-group of much older adults using interest factors that naturally exclude children and young people, e.g. 'insurance products', 'family holidays' etc.**
Evidence	We saw examples in the data of circumstances where the combination of age targeting and other targeting options are very likely to limit the alcohol ad to an older adult audience, reducing significantly the likelihood of children falsely registered as, or incorrectly inferred to be, 18+ from being in the target audience. For example, those targeted to older audiences with interests likely to be particular to that age group (e.g. *business travel*). To the best of our understanding, this is almost certainly because the brand is positioned for that market and excluding of children from the audience is likely to be a natural by-product of such targeting.
ASA Advice	Marketers should be aware that certain interest-based categories e.g. business travel, are – by their nature – unlikely to be paired with children's social media accounts. Use of such adult-centric interests, especially in combination with older adult age-targeting parameters are likely to reduce the possibility of alcohol ads being delivered to children falsely registered as, or incorrectly inferred to be, 18+.

Annex: Data request as sent to platforms

Dear [platform representative],

ASA monitoring project: Platform Data and the Protection of under-18s

The Advertising Standards Authority (ASA) is the UK's regulator of advertising across all media. We are writing to online platforms24 as part of an ongoing monitoring project to request specific, anonymised data relating to the use by alcohol brands of audience targeting tools provided on your platform.

This letter follows up on a paper submitted to, and action points arising from, a meeting of the ASA & CAP Online Forum on 3 March; we attach the paper and the action points for your convenience. The letter explains the background to the data request and how to respond.

Background

The ASA's Strategy commits it to delivering proactive regulation of online advertising; working with online platforms to secure socially responsible ads. This includes a focus on appropriately limiting under-18s' exposure to age-restricted ads in sectors like gambling and alcohol and under-16s' exposure to ads for foods high in fat, salt or sugar (HFSS).

Our data request is limited to alcohol ads in recognition of the novel nature of the request; a concern to minimise burden on your time; and in the expectation that lessons from this exercise may support more efficient collaboration, which would facilitate a broader data request in the future.

The ASA has previously used child avatars to assess, at scale, whether age-restricted ads were being served on open access children's websites. At the publication of that work we committed to conduct a related exercise in logged-in online environments.

When marketers of age-restricted ads use online platforms which provide, for audience targeting purposes, known data (e.g. age data submitted by user account holders) and inferred data (e.g. interests inferred as a result of account holders seeking out categories of content), the ASA requires marketers to do more than simply rely on age data to ensure the ads are targeted away from the youth audience. Specifically it requires marketers to select and actively exclude interest-based targeting options, provided by the platform, that are, on balance, more likely to result in their ad reaching an adult audience rather than one comprised of under 18s. This policy is described in more detail in CAP's "Children and Age-Restricted Ads Online" Advertising Guidance ("the Guidance").

Partnering with platforms to secure responsible advertising

The overwhelming majority of ads are responsible, but owing to the scale of online advertising, the range of online properties and the possibilities afforded to marketers to target audience segments, it's necessary for the ASA to partner with platforms and/or use third-party technology to tackle the minority of ads that break the rules. In logged-in environments, it's currently more straightforward for the ASA to work in partnership with platforms to achieve mutual objectives.

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24 Facebook, Instagram, YouTube, Tik-Tok, Snapchat, Twitter, Twitch.

We understand that participating platforms will want some reassurance as to what we intend to do with the requested data. At the time of writing and subject to the quality of data we receive, we are minded to publish a report, which:

- clarifies the rules and guidance to prevent alcohol and other age-restricted ads from being targeted at an under-18 audience.
- sets out how we have used technology to police compliance with these rules on open access websites and identify some of the issues that complicate the use of third party technology in logged-in environments.
- includes a small section on how the ASA has, for nearly 60 years, worked with UK media to tackle irresponsible ads and how we do so, today, with online platforms, citing here the support platforms provide in helping the ASA to sanction advertisers who will not comply with ASA rulings.
- summarises how legislation and developing public policy are seeking to hold online platforms to greater account, including through independent regulation, with a view to impressing on the reader how – through partnership working – the ASA and platforms are delivering on this growing expectation.
- includes a technical section relating to the many ways in which advertisers can use platform-specific and additional proprietary or third-party data and technology to support their ad targeting decisions.
- provides a general and platform-specific assessment of the data, with a view to making some observations as to whether alcohol advertisers are selecting and actively excluding targeting options with the result that their ads are more likely to reach adult account holders rather than under-18 account holders.
- highlights the limitations of the data and, therefore, the limitations of the observations.
- discusses learnings and next steps.

Because we are seeking anonymised data, this report could not result in enforcement action against alcohol brands, but there is potential for the report to observe where we see practices that are likely to be compliant or practices that might be problematic, including between different platforms.

In drafting the report we would look to engage platforms about sections relating directly to them before inviting the platforms to consider the report in its entirety. As an ASA Report, the ASA Council would ultimately be responsible for agreeing its content, including the decision to publish.

What we're asking you to do

We are now asking you to provide us with data.

Specifically we wish to see anonymised data about the targeting choices that UK alcohol brands used in relation to advertising which would be seen by logged-in account holders between 1 February 2020 and 31 March 2020 inclusive.

We understand that, depending on the platform and the ad, the selection of interest-based factors is not necessarily confined to logged-in account holders and may cover non-logged-in users also.

For clarity we are requesting data for alcohol brands only. For practical purposes we wish to exclude from scope the wider constituency of advertisers who might refer to alcohol such as supermarkets, restaurants and pubs; you need not provide data for those.

However where alcohol brands undertake other activities, for example alcohol brands which operate their own bars, you should include data for their advertising. Where there is ambiguity about the status of a particular advertiser please favour the inclusion of their data.

We recognise that there is variation in the advertising tools and terminology from platform-to-platform. However, in broad terms you should provide all targeting choices made under the following categories:

- Age and other demographic targeting
- Interest-based / audience targeting
- Content category targeting
- Any other targeting options which your platform provides (e.g. digital content labels)

In practice, please provide the data in an Excel spreadsheet which clearly sets out the different (anonymised) alcohol brand advertisers on each tab. Within each tab you should provide a complete list of available targeting options and then indicate whether each option was specifically included, actively excluded or not used. We would be grateful if you could use the attached template as a starting point.

We appreciate that interest-based targeting is not always used in isolation and may be used in conjunction with URL exclusion lists. You need not provide those lists but please use the option on the spreadsheet to indicate whether such a list was used.

How to respond

We welcome feedback by 5pm on Friday 26 June about any material impediments e.g. legal constraints, your platform might face in providing the ASA with the requested data. No such impediments were identified at or after the ASA & CAP Online Forum on 3 March. If you can foresee any technical issues about providing the data or have questions about how to do so in practice we would be grateful to receive them by that date also.

 In the absence of any such impediments, we would welcome receipt of the data, in the form advised, by no later than 5pm on Friday 10 July.

Questions and submissions should be sent to [ASA contact].

Contact us

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