

Children's exposure to age-restricted TV ads: 2019 update



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Introduction

The Advertising Standards Authority (ASA) is the UK's independent advertising regulator. We have been administering The UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (written and maintained by the Committee of Advertising Practice) for 58 years and the UK Code of Broadcast Advertising (written and maintained by the Broadcast Committee of Advertising Practice) for 16 years. We are responsible for ensuring that advertising is legal, decent, honest and truthful.

The Advertising Codes include rules to protect people who are vulnerable, including children (which the Codes define as those aged 15 and under) and young people (those aged 16 and 17). They include rules on the scheduling and placement of ads to ensure that under 18's exposure to advertisements for certain product categories, such as alcohol and gambling, is appropriately limited. The rules prohibit these ads from appearing in children's and young people's media and, where they appear in media targeting a predominantly adult audience, the content is restricted to ensure that they cannot appeal particularly to those under the age of 18.

This report provides an update on children's exposure to alcohol and gambling advertising on TV in 2019. Unlike the [first ASA exposure report](#) and the [2018 update](#), this report will not include an analysis on children's exposure to TV advertising for foods and soft drinks high in fat, salt and sugar (HFSS). Exposure data analysis in this area has been put on hold in view of the Government's consultation on advertising restrictions for HFSS advertising on TV and the greater complexity involved in collecting exposure data for HFSS advertising. This also allows for a timely publication of the report that includes an update on the most recent figures for children's exposure to TV advertising for alcohol and gambling.

Some of the key findings are:

- **Alcohol ads:** Between 2008 and 2019, children's exposure to alcohol advertising on TV has decreased by two thirds, from an average of 2.8 ads per week in 2008 to 0.9 ads per week in 2019. The average number of alcohol ads children saw on TV in 2019 was the lowest in the 12-year period covered, and remained at similar levels to those observed in the four previous years.
- **Gambling ads:** In 2019, children's exposure to gambling advertising on TV has returned to similar levels observed at the beginning of the analysis period. Children saw, on average, 2.2 and 2.7 gambling ads on TV per week in 2008 and 2009, respectively; in 2019, children saw a weekly average of 2.5 gambling ads on TV. Children's exposure to gambling advertising on TV has remained at similar levels during the last six years, notwithstanding that exposure levels rose slightly in 2018.
- **All TV ads:** Between 2008 and 2019, children's exposure to all TV ads nearly halved, falling by 47.2%, from 219.5 ads per week in 2008 to 115.9 ads per week in 2019. Children's exposure to all TV ads decreased from an average of 141.9 ads per week in 2018 to 115.9 ads per week in 2019. The downward trend has continued at a steady rate since the peak in children's exposure in 2013.
- The number of TV ads seen by children aged 4-15 years has continued to decline markedly since the peak in 2013, at an average of 229.3 ads per week, halving to an average of 115.9 ads per week in 2019.

- Over the same period, children’s exposure to:
 - TV alcohol ads decreased by two thirds;
 - TV gambling ads decreased by just under half.
- This suggests that children’s exposure to TV ads for alcohol is falling at a faster rate than their exposure to all TV ads. While the rate of decline in children’s exposure to gambling ads on TV is marginally lower than the rate of decrease in exposure to all TV ads, children’s exposure to gambling ads has remained at a lower level since the 2013 peak.

The objective of the ASA’s reporting in this area is to look at children’s exposure, over a number of years, to TV ads for products that attract public policy considerations, including the products’ potential impact on children and young people. In this 2019 update report, the analysis will focus on children’s exposure to alcohol and gambling advertising on TV.

2008 represents the first full year in which the gambling advertising rules were implemented. The choice of this starting point has implications for the patterns of audience exposure that are identified in this report; it is important to interpret their significance within the context of the parameters selected. The data indicates, however, that children’s exposure to TV ads for alcohol and gambling continues to trend downward or has remained stable in recent years.

Scheduling rules: determining ‘particular appeal’ of programmes

Broadcasters are required to exclude age-restricted ads from being advertised in or adjacent to programmes commissioned for, principally directed at or likely to appeal particularly to audiences below the age of 18 or 16 (depending on the advertised product). It is usually straightforward for broadcasters to identify a programme commissioned for or principally directed at children by considering the intended audience of the programme at commissioning or acquisition stage. A clear example of this is programming included on a dedicated children’s channel.

For most TV channels operating under an Ofcom licence, the likelihood of a programme appealing particularly to children is determined by a process of ‘audience indexing’, which involves the use of Broadcasters’ Audience Research Board (BARB) data. Audience indexing helps to determine how likely a programme is to reach viewers in a particular age category, relative to the whole audience. The process allows these TV channels to identify a programme (or programme part in the case of long-form programming) that appeal disproportionately to children by reference to an age category index score for each programme, before it is broadcast. If an age group, for example 4-15s, has an audience index of 100, it means that that group is proportionally represented in the programme audience in relation to its share of the total TV audience. An index of 120 means it is over-represented by 20%, which BCAP considers to be a sufficiently significant share of the audience to indicate that the programme is likely to have particular appeal to that age group. Therefore, TV channels that have access to BARB data are required to exclude age-restricted ads that achieve an index of 120 or above for the relevant age group.

For TV channels that do not use BARB data or where the audience size is likely to be too small to produce reliable audience composition forecasts, BCAP invites broadcasters to adopt a cautionary approach and draw on other data that is reasonably available to them to them. This is further explained in [BCAP guidance on scheduling and audience indexing](#).

References to 'children' and 'adults' in this report

The primary purpose of this report is to focus on children's exposure to TV ads for alcohol and gambling. Where this report refers to 'children' generally, this captures the BARB age category of 4-15, unless specified otherwise, for example where the analysis further examines the exposure levels for younger children aged between 4-9 and older children aged between 10-15. References to 'adults' in this report cover BARB age categories of 16 years old and above.

How BARB data is analysed and presented in this report

This report calculates exposure to TV ads for alcohol and gambling on an average weekly basis for each year from 2008 to 2019, giving a picture of trends over the last decade.

2008 was the first full year when all gambling services could legally be advertised on television. Before then, TV ads for sports betting and online casino were prohibited. Alcohol advertising has been subject to a scheduling restriction since the audience indexing approach was adopted by the Independent Television Commission (ITC), a forerunner of Ofcom, in the mid-1990s.

BARB data measures exposure in terms of 'impacts' for the audience as a whole and groups within it, for example by age category, region or socio-economic status. An impact is an instance of advertising in a chosen category (in this case, alcohol or gambling) being viewed by a member of a demographic group, for example children aged 4-15.

As the number of impacts reflects the number of views, 300 impacts could be one ad viewed 300 times, or 300 ads viewed once each, or any similar combination. The statistics for adults' and children's exposure in the sections that follow are the number of impacts divided by the number of adults or children in the UK at that point in time, averaged across the year, to calculate a weekly average per individual.

This is an important measure as it tells us, on average, how many times per week an average child is exposed to TV ads for the chosen category, for each year. For ease of comparability, we have used this metric as the basis for all the data analysis in this report.

We are mindful that concern about children's exposure to age-restricted advertising relates both to the ads they receive (and the discrete messages those ads include) and the amount of time those ads (and the messages they include) take up in the schedule: to be as transparent as possible in our account of children's exposure to these categories of advertising, we report on the number of impacts and the length of time over which exposure took place. Readers will note that, at various points in the individual product category sections of the report, these two measures may fluctuate at different rates – the number of messages may go down while the amount of time goes up, or vice versa. The variance is generally modest in scale. The average number of impacts (based on unweighted impacts) remains the principal metric used in this report; the values denoting the number of seconds (calculated based on duration weighted impacts) are indicative of the likely length of exposure and are provided for context only.

Other measures used in this report include:

- **Total ad impacts** – This measure indicates the number of times that all ads are viewed. The number of total ad impacts in this report relates to children aged between 4-15 years, unless otherwise specified, and is presented as a weekly average per year.

• **Children’s exposure as a percentage of adults’ exposure** – The BCAP scheduling rules result in advertising being targeted away from children’s channels or programming and other programming where they are proportionally over-represented in the audience. This measure provides an insight into the efficiency of restrictions intended to appropriately limit children’s exposure to ads for certain product categories. For example, if children’s exposure as a percentage of adults’ exposure to an ad for a particular product is 25%, it means that children see around one of those ads for every four seen by adults.

• **Children’s exposure as a percentage of exposure to all TV ads** – This measure shows how much of all the TV ads seen by children are made up of ads for alcohol or gambling, expressed as a percentage.

Exposure figures presented within this report have been rounded to one decimal place, unless set out otherwise. Any percentages set out related to increases and decreases in exposure levels, as well as total figures, in a given period are calculated based on unrounded impact figures for accuracy, and those percentages are then rounded to one decimal place when presented in the report. As such, readers may find a variance if calculating using the rounded figures within this report.

BARB data is continuously consolidated and finessed, and this may account for some minor discrepancies in some of the figures presented in this report and in previous reports.

When considering the data presented in this report, readers should also refer to important contextual information set out in [our first exposure report](#), in particular the following:

- BCAP’s policy objectives and delegated statutory duties (page 5)
- Q&A (page 35)

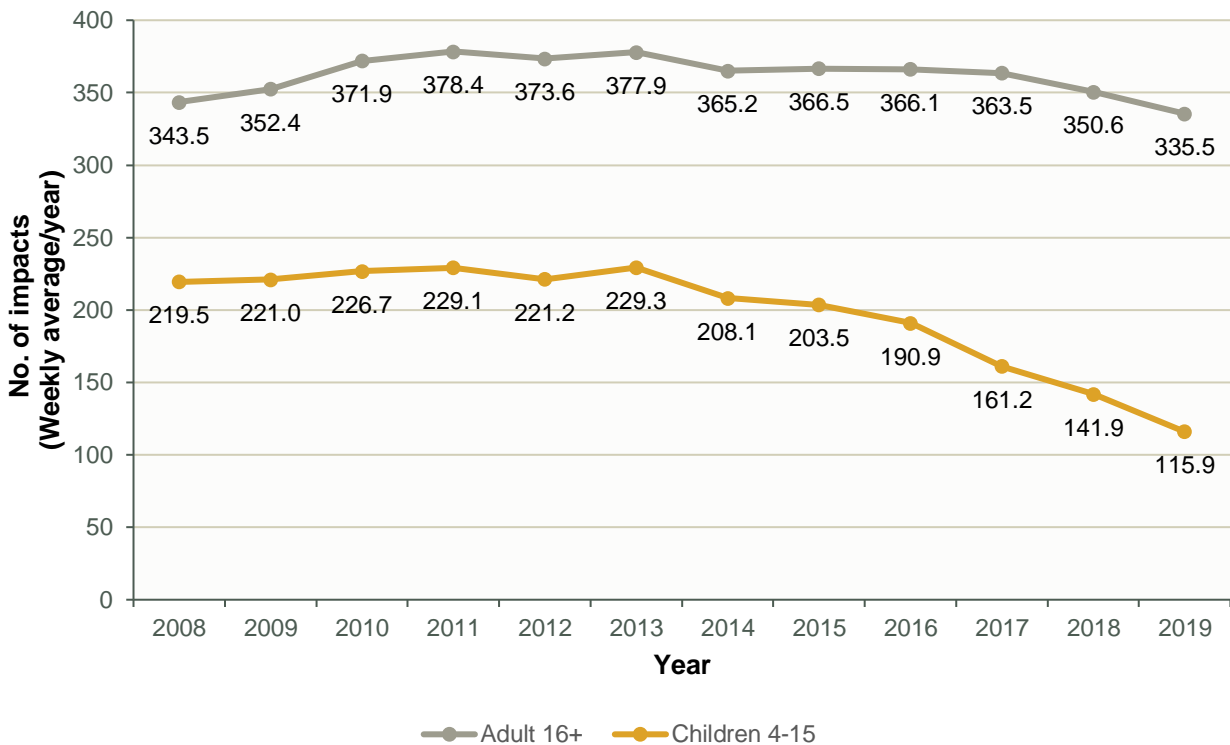
Annual exposure to all TV ads

This data is intended to provide important contextual information to the product category-specific exposure data presented in the following sections of the report.

Key findings:

- Between 2008 and 2019, children’s exposure to all TV ads decreased by 47.2%, from 219.5 ads per week in 2008 to 115.9 ads per week in 2019. Children’s exposure to all TV ads decreased from an average of 141.9 ads per week in 2018 to 115.9 ads per week in 2019. The downward trend has continued at a steady rate since the peak in children’s exposure in 2013.
- In 2019, children saw an average of 115.9 ads per week, a reduction of 49.4% from a peak of 229.3 ads per week in 2013.
- In 2019, adults saw, on average, 335.5 TV ads per week, a reduction of 11.4% from a peak of 378.4 ads per week in 2011.
- Children’s total TV ad exposure, relative to adults’, has fallen from a peak of 63.9% in 2008 to 34.6% in 2019. That means children saw, on average, just over one ad for every three TV ads seen by adults in 2019.

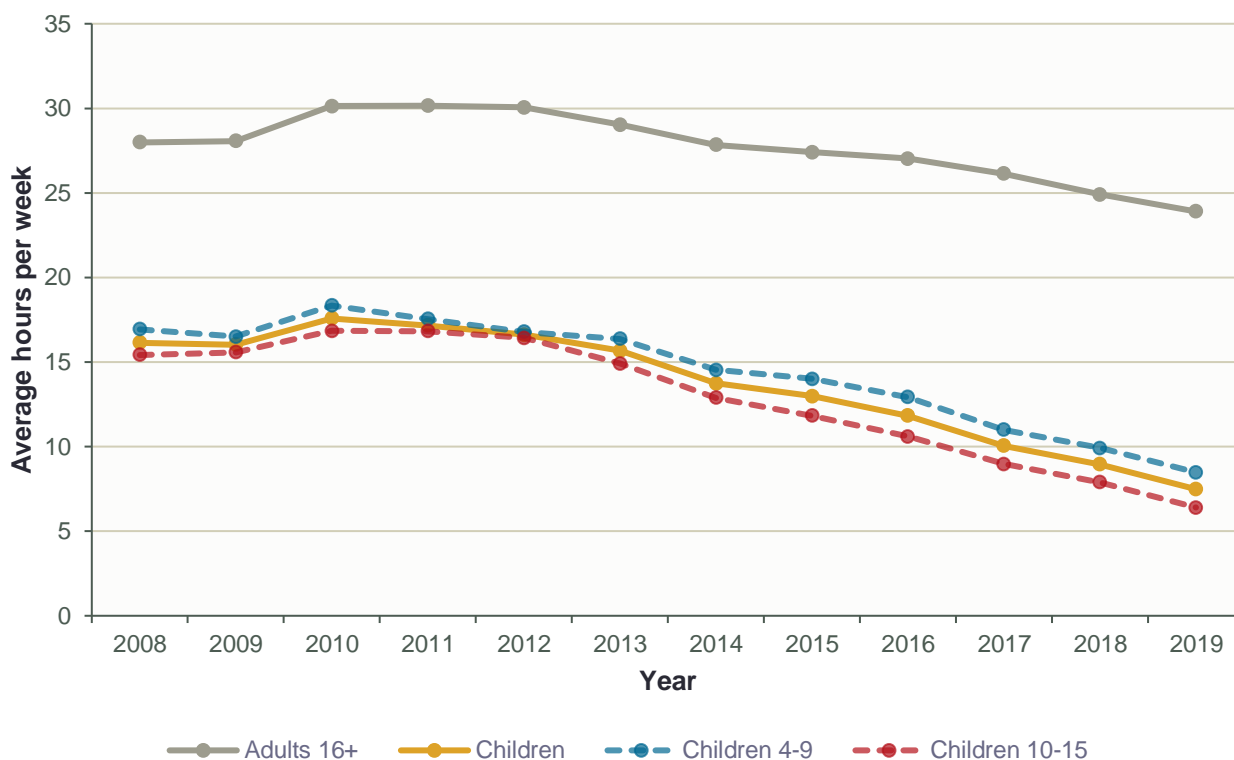
Exposure levels to all TV ads – age groups



Adults’ exposure to all TV advertising continues to remain relatively stable over the period observed. There is a marginal decrease of 2.3% from an average of 343.5 ads per week in 2008 to 335.5 ads per week in 2019. The level of adults’ exposure to all TV ads in 2019 was the lowest within the 12-year period. Since the peak in 2011 (an average of 378.4 ads per week), adults’ exposure to all TV advertising decreased by 11.4%.

Exposure levels for children to all advertising on TV have nearly halved, falling by 47.2%, between 2008 (an average of 219.5 ads per week) and 2019 (115.9 ads per week). Children’s exposure to TV ads continues to decline at a steady rate from the peak in 2013 (229.3 ads per week) and has halved, falling by 49.4%, between 2013 and 2019. The average number of TV ads seen by children in 2019 is also the lowest within the 12-year period observed, following a more marked decline in the last three years from 2016.

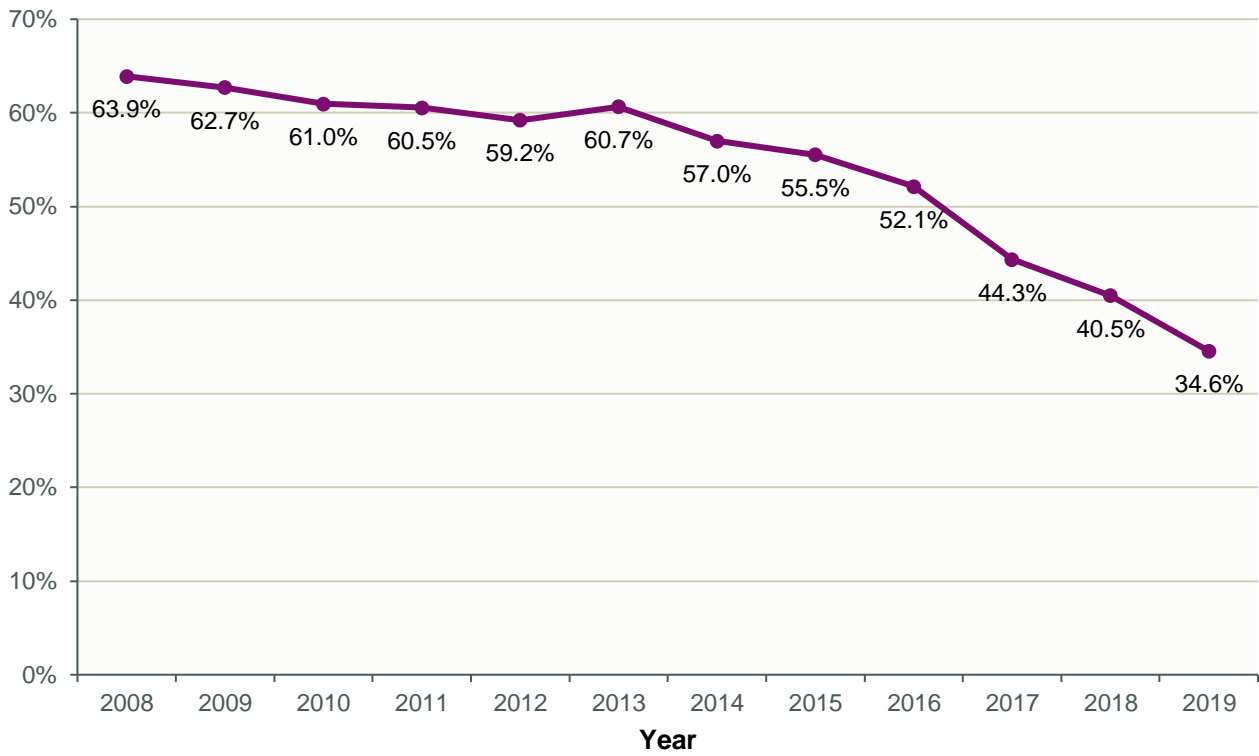
Average hours of television viewing – 2008-2019



The continuation of the downward trend in children’s exposure to TV ads is, in the main, likely to be driven by their increasing consumption of online media, such as on-demand and online video use, as well as social media engagement. An analysis of BARB viewing data indicates that the amount of time children spent watching broadcast television continues to decrease. In 2019, children aged 4-15 watched, on average, 7.5 hours of television per week, down by 1.5 hours from 2018 and less than half the viewing levels in 2010 (an average of 17.6 hours per week)¹. Viewing levels for older children aged 10-15 continue to be lower than those for younger children aged 4-9.

¹ In 2010, a new BARB audience panel was introduced and, as a result, data comparisons pre and post 2010 should be made with caution.

Exposure to all TV ads – children’s exposure as a percentage of adults’ exposure



Children’s exposure to all TV ads, relative to adults’, continued to steadily decrease from a peak of 63.9% in 2008 to 34.6% in 2019. This means that, in 2019, children saw, on average, one TV ad for every three seen by adults in 2019.

Exposure to TV ads for alcohol products

The BCAP Code states:

32.2 *[The following products] may not be advertised in or adjacent to programmes commissioned for, principally directed at or likely to appeal particularly to audiences below the age of 18:*

32.2.1 *alcoholic drinks containing 1.2% alcohol or more by volume*

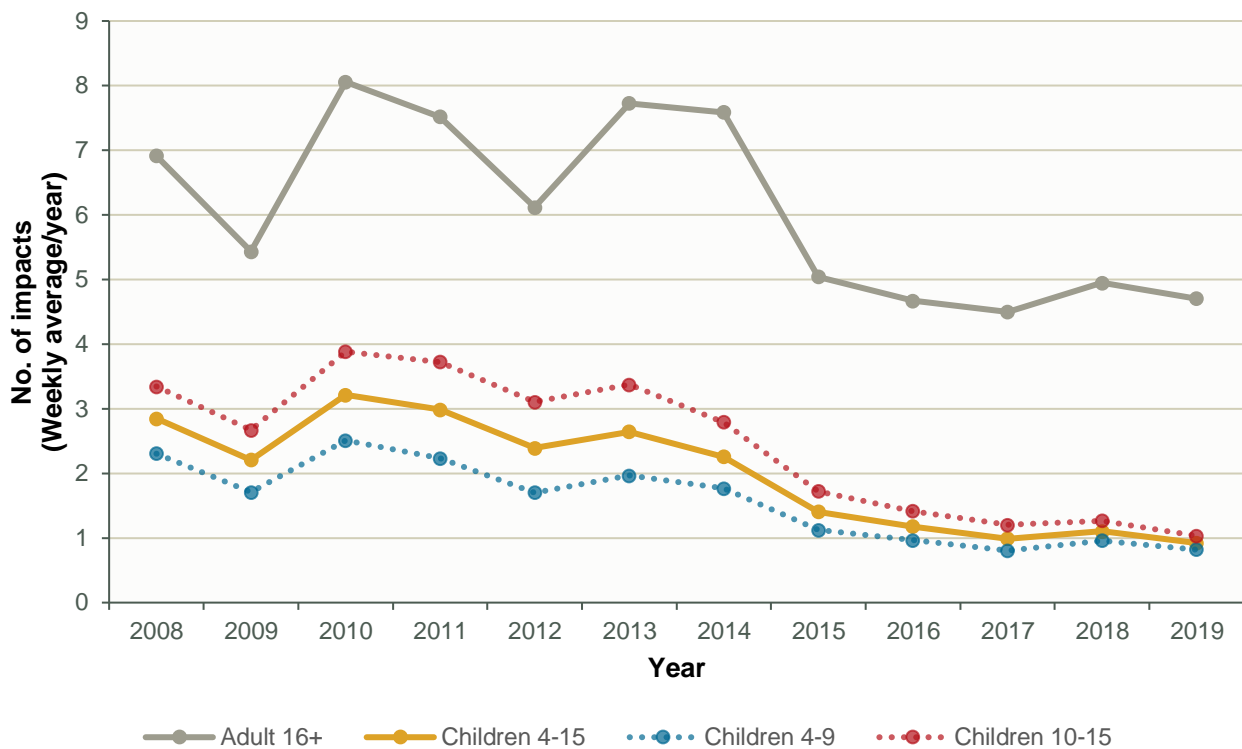
32.4 *[The following products] may not be advertised in or adjacent to programmes commissioned for, principally directed at or likely to appeal particularly to persons below the age of 16:*

32.4.7 *drinks containing less than 1.2% alcohol by volume when presented as low-alcohol or no-alcohol versions of an alcoholic drink*

Key findings:

- Between 2008 and 2019, children's exposure to alcohol advertising on TV has decreased by two thirds, from an average of 2.8 ads per week in 2008 to 0.9 ads per week in 2019. The average number of alcohol ads children saw on TV in 2019 was the lowest in the 12-year period covered, and remained at similar levels to those observed in the four previous years.
- Children's exposure to alcohol ads on TV, relative to adults', continues to fall from the peak of 41.1% in 2008 to 19.6% in 2019. This means that in 2019, children saw, on average, around one alcohol ad for every five seen by adults, compared to 2008 in which children saw, on average, around two alcohol ads for every five seen by adults.
- The majority of TV ads for alcohol products that children see continues to be ads for beer, cider or perry, followed by ads for spirits or liqueurs.
- Alcohol ads continue to make up less than 1.5% of all TV ads seen by children each year between 2008 and 2019. In 2019, 0.8% of all TV ads seen by children were alcohol ads. This percentage has remained below 1% since 2015.
- Children's exposure to all TV ads halved, from a peak of, on average, 229.3 ads per week in 2013 to a low of 115.9 ads per week in 2019. Over the same period, levels of children's exposure to alcohol ads on TV have fallen by two thirds. This suggests that children's exposure to alcohol ads continues to fall at a faster rate than their exposure to all TV advertising.

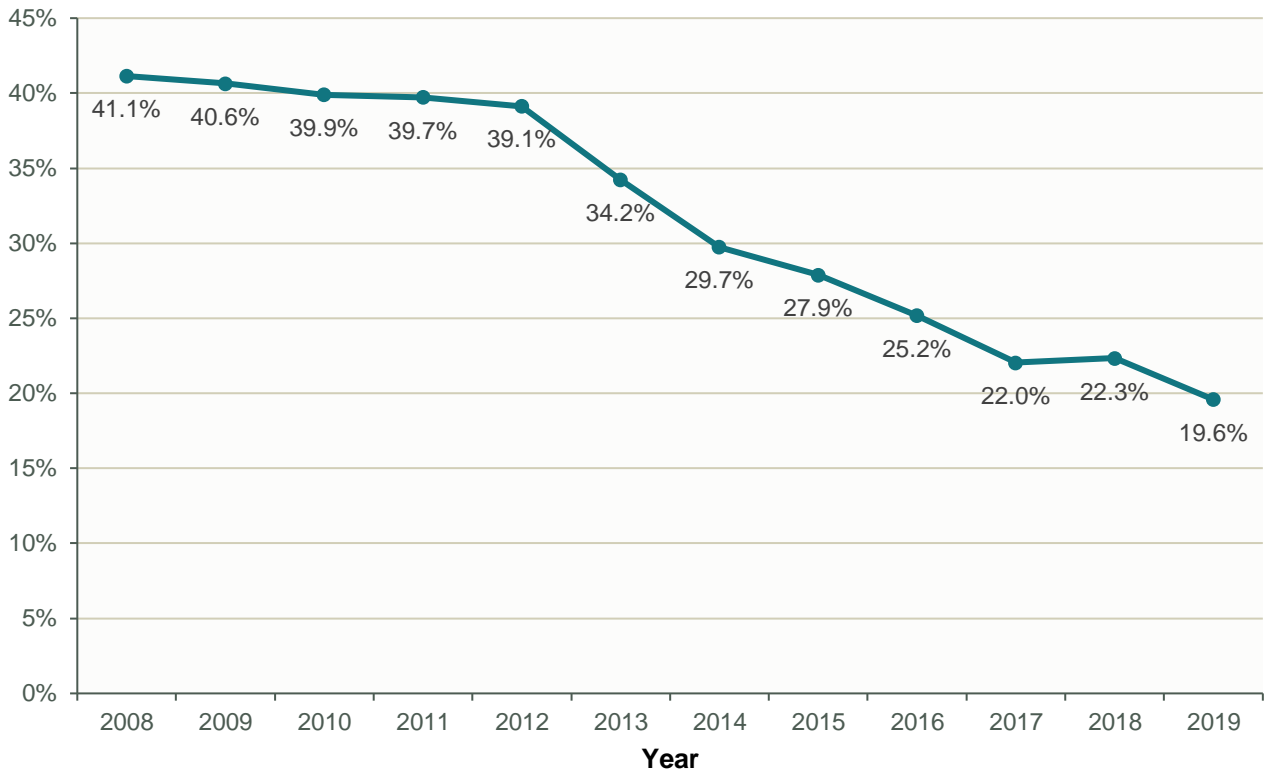
Average weekly exposure per year – age groups



In 2008, children aged 4-15 saw, on average, 2.8 alcohol ads on TV per weeks (approx. 75.8 seconds). In 2019, children in that age group saw, on average, 0.9 alcohol ads per week (approx. 20.2 seconds). This indicates a reduction in children’s exposure to alcohol ads on TV by two thirds during the 12-year period observed. Since the peak in 2010 when children saw, on average, 3.2 alcohol ads on TV per week (approx. 80.1 seconds), exposure levels have fallen by nearly three quarters to 0.9 alcohol ads per week. The average number of alcohol ads seen by this age group per week in 2019 remain at similar levels to those observed during the four previous years.

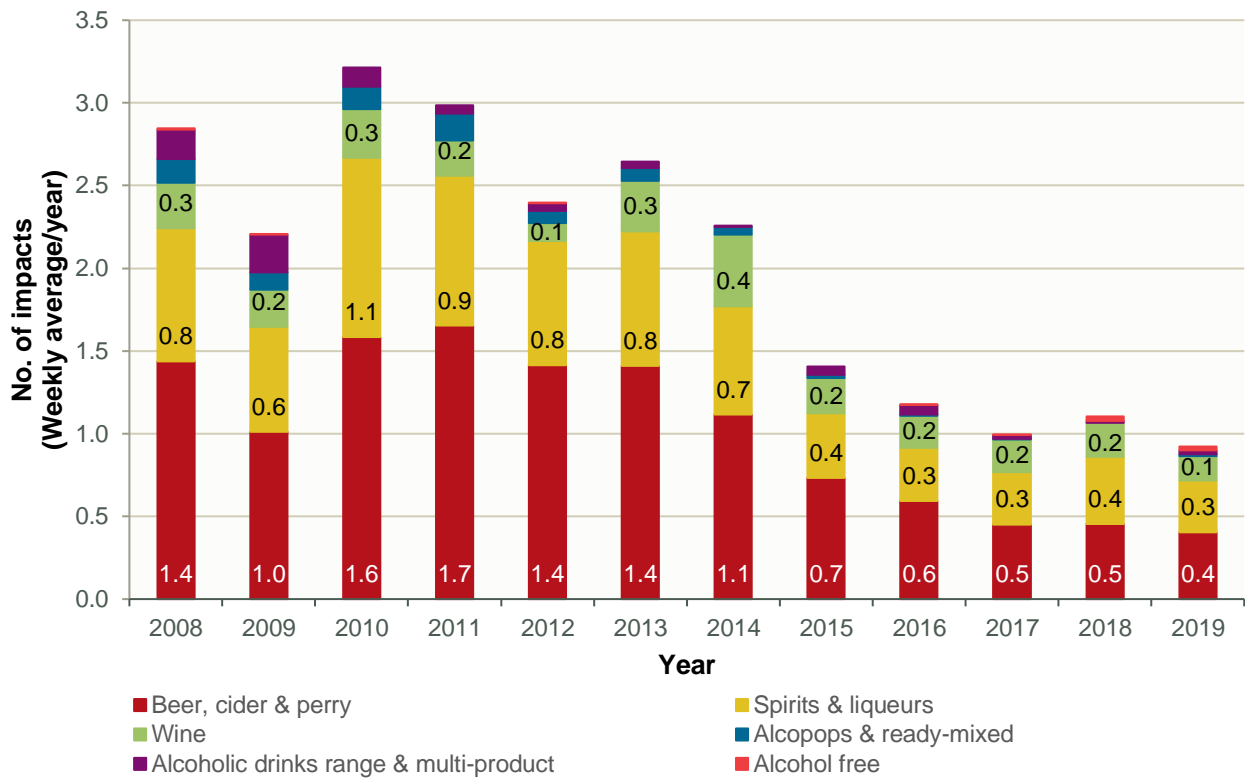
In 2019, younger children aged between 4-9 saw, on average, 0.8 alcohol ads on TV; older children aged between 10-15 saw, on average, 1.0 alcohol ad per week. Adults’ exposure to alcohol ads stood at an average of 4.7 ads per week, and have remained at similar levels since 2016.

Children's exposure as a percentage of adults' exposure



Since the marginal increase from 2017 to 2018, children's exposure to alcohol ads, relative to adults', has fallen to 19.6% in 2019. This percentage is also the lowest since the peak in 2008. This means that, in 2019, children saw, on average, around one alcohol ad for every five seen by adults; in 2008, which was the start of the period observed, children saw around two alcohol ads for every five seen by adults.

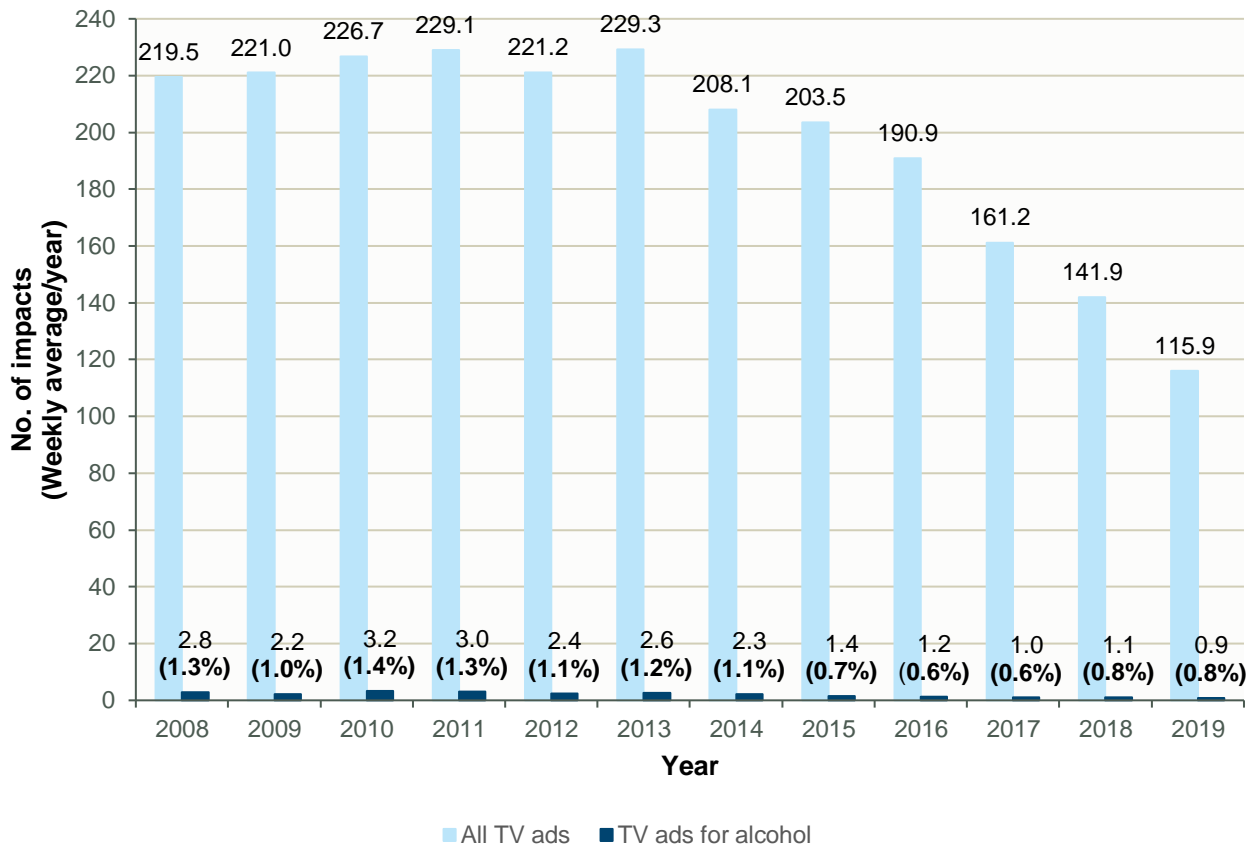
Children’s exposure to alcohol ads – proportion of product types



Ads for beer, cider or perry continue to make up the majority of alcohol ads seen by children over the 12-year period. In 2019, children saw an average of 0.4 TV ads for those products per week. Proportionally, beer, cider or perry ads continue to make up of around half of all alcohol ads on TV seen during the period from 2008 to 2019.

The second largest proportion of all alcohol products ads continue to be ads for spirits or liqueurs; children’s exposure to ads for those products stood at an average of 0.3 ads per week in 2019.

Children’s exposure to alcohol ads as a percentage of exposure to all TV ads



In 2019, alcohol advertising on TV made up 0.8% of all TV advertising children saw on average each week. Since 2015, the proportion of alcohol advertising that made up TV advertising seen by children has remained at similar levels and below 1%.

As illustrated in the chart, children’s exposure to all TV advertising has continued to decline at a steady rate since the peak in 2013, driven by the decrease in TV viewing amongst children. Children’s exposure to all TV ads halved from a peak of, on average, 229.3 ads per week in 2013 to 115.9 ads per week in 2019. Over the same period, children’s exposure to alcohol advertising on TV has fallen by two thirds. This suggests that children’s exposure to alcohol ads on TV continues to fall at a faster rate than their exposure to all TV advertising.

On the basis that BCAP’s scheduling restrictions on alcohol advertising on TV have not changed over the 12-year period observed, other factors such as changes in marketing spend and behaviour are likely to account for this outcome. The most recent set of exposure data suggests that the scheduling restrictions continue to help appropriately limit children’s exposure to TV alcohol advertising to the extent that the rules prohibit those ads from appearing in significant parts of the broadcast schedule.

Exposure to TV ads for gambling products

The BCAP Code rules state:

32.2 *[The following products] may not be advertised in or adjacent to programmes commissioned for, principally directed at or likely to appeal particularly to audiences below the age of 18:*

32.2.2 *gambling except lotteries, 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*

32.4 *[The following products] may not be advertised in or adjacent to programmes commissioned for, principally directed at or likely to appeal particularly to persons below the age of 16:*

32.4.1 *lotteries*

32.4.2 *football pools*

32.4.3 *equal-chance gaming (under a prize gaming permit or at a licensed family entertainment centre)*

32.4.4 *prize gaming (at a non-licensed family entertainment centre or at a travelling fair)*

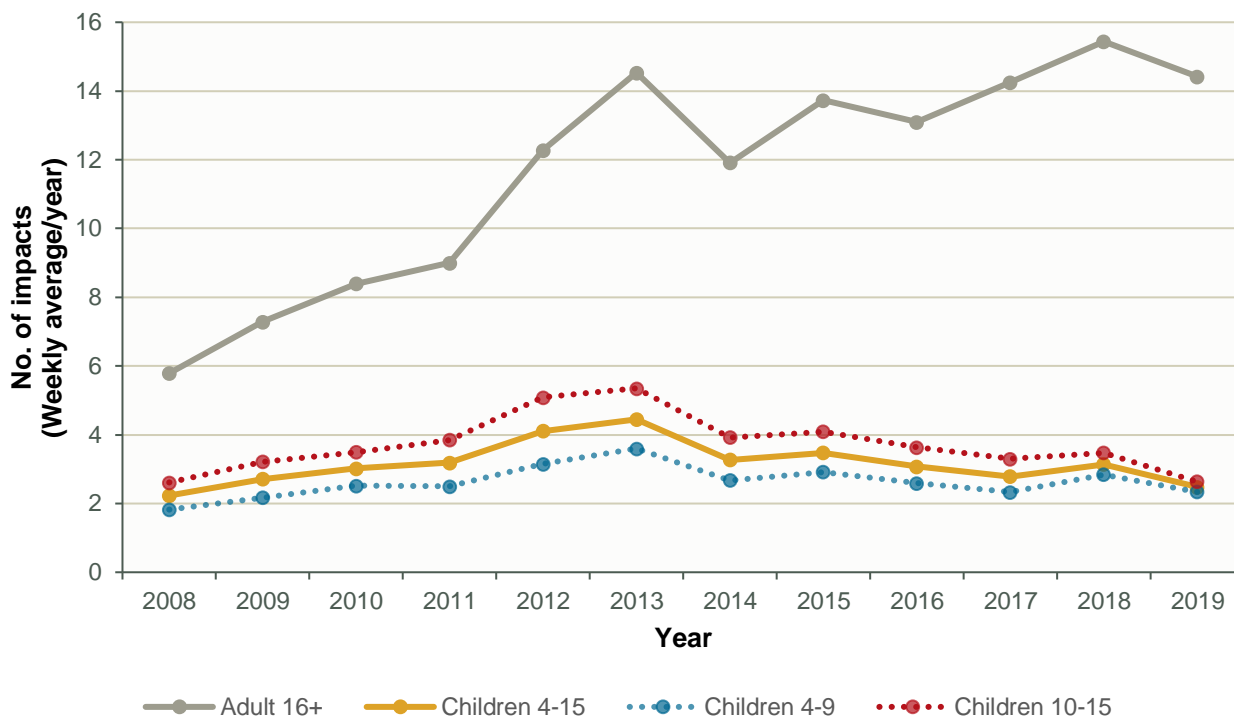
32.4.5 *Category D gaming machines*

Key findings:

- In 2019, children's exposure to gambling advertising on TV has returned to similar levels observed at the beginning of the analysis period. Children saw, on average, 2.2 and 2.7 gambling ads on TV per week in 2008 and 2009, respectively; in 2019, children saw a weekly average of 2.5 gambling ads on TV. Children's exposure to gambling advertising on TV has remained at similar levels during the last six years, notwithstanding that exposure levels rose slightly in 2018.
- Children's exposure to TV gambling ads, relative to adults', stood at 17.2% in 2019, the lowest in the 12-year period covered. This means that in 2019, children saw, on average, just under one gambling ad for every five seen by adults.
- Gambling ads made up less than 2% of all the TV ads that children saw, on average in a week every year between 2008 and 2017. This increased slightly to 2.2% in 2018 and remained at a similar level in 2019, at 2.1%.
- Since 2011 (the first year when we can be confident about product breakdown information for gambling products), ads for bingo, lottery and scratchcards have continued to make up the majority of gambling ads that children see on TV. This is followed by ads for casinos, and then ads for sports-related gambling.

- Children’s exposure to all TV ads halved, from a peak of, on average, 229.3 ads per week in 2013 to a low of 115.9 ads per week in 2019. Over the same period, children’s exposure to gambling ads on TV has fallen by just under half. While the rate of decline in children’s exposure to gambling ads on TV is marginally lower than the rate of decrease in exposure to all TV ads, children’s exposure to gambling ads has remained at a lower level since the 2013 peak.

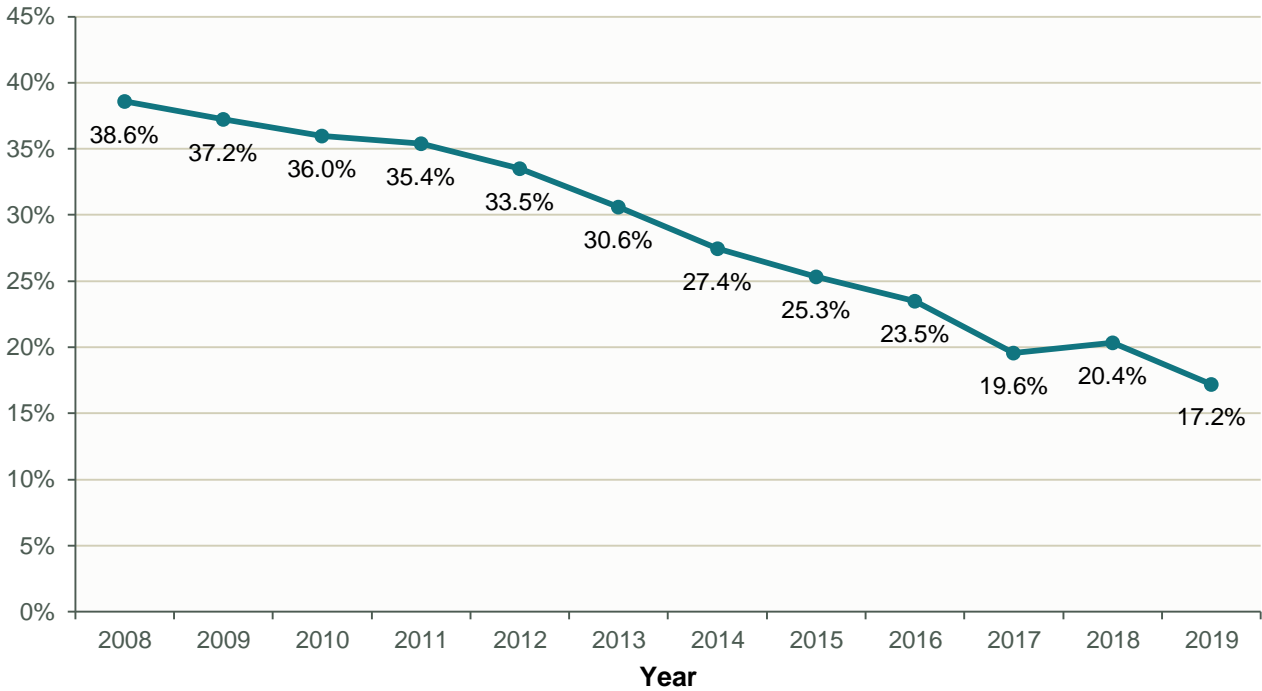
Average weekly exposure per year – age groups



2008 was the first full year in which all gambling products and services could be legally advertised on television. In that year, children aged 4-15 saw, on average, 2.2 gambling ads on TV per week (approx. 48.0 seconds). Exposure levels gradually increased and peaked in 2013, at an average of 4.4 ads per week (approx. 108.9 seconds), and have since declined slowly. In 2019, children saw an average of 2.5 gambling ads on TV per week (approx. 58.8 seconds), similar levels to 2008 (2.2 ads per week) and 2009 (2.7 ads per week).

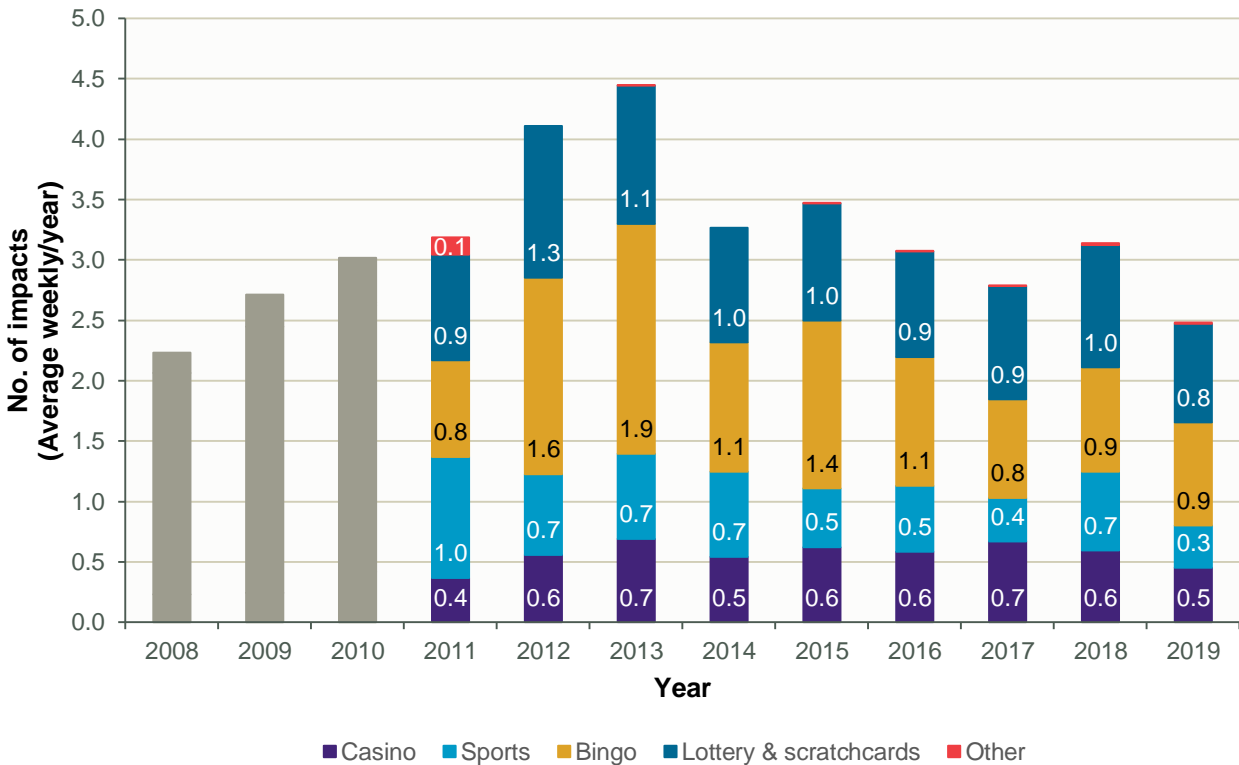
Gambling TV ad exposure for younger children aged 4-9 stood at an average of 2.3 ads per week in 2019; exposure for older children aged 10-15 stood at an average of 2.6 ads per week. For adults, exposure to gambling advertising decreased by 1.0 ad per week, from a peak of, on average, 15.4 ads per week in 2018 to 14.4 ads per week in 2019.

Children’s exposure as a percentage of adults’ exposure



Children’s exposure to gambling advertising on TV, relative to adults’, saw an uptick to 20.4% in 2018 from 19.6% in 2017, following a steady year-on-year decline since 2008. This fell to 17.2% in 2019, which meant that children saw, on average, just under one gambling ad on TV for every five seen by adults.

Children’s exposure to gambling ads – proportion of product types

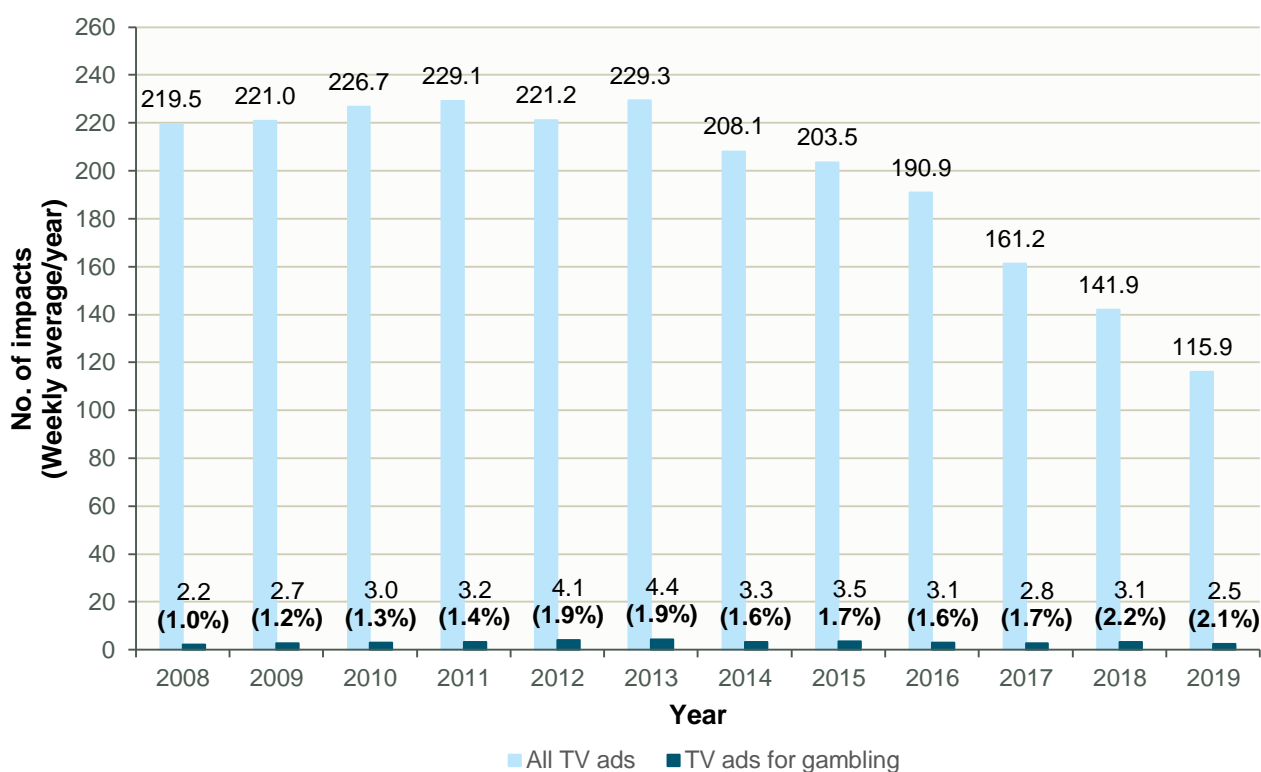


Reporting of exposure data for different gambling product categories starts from 2011. As noted in previous ASA exposure reports, product classification data from 2008 to 2010 does not permit a detailed breakdown of children’s exposure to TV ads for bingo, lottery or scratchcards; the overall weekly average impact figures for gambling advertising on TV during the period between 2008 and 2010 remain accurate.

TV ads for bingo, lottery and scratchcards combined remain the largest proportion of gambling ads that children have seen on TV since 2011. Between 2011 and 2019, excluding the peak in 2013, children saw, on average, around 1.0 TV ad for bingo and 1.0 TV ad for lottery and scratchcards each week.

Children’s exposure to sports-related gambling advertising on television has continued to remain lower than initial levels in 2011, at 1.0 ads, and has fallen to its lowest level of 0.3 ads in 2019.

Children’s exposure as a percentage of exposure to all TV ads



Between 2008 and 2017, gambling advertising stayed below 2% of all TV ads seen by children. This percentage rose to 2.2% in 2018 and stayed at a similar level in 2019, at 2.1%.

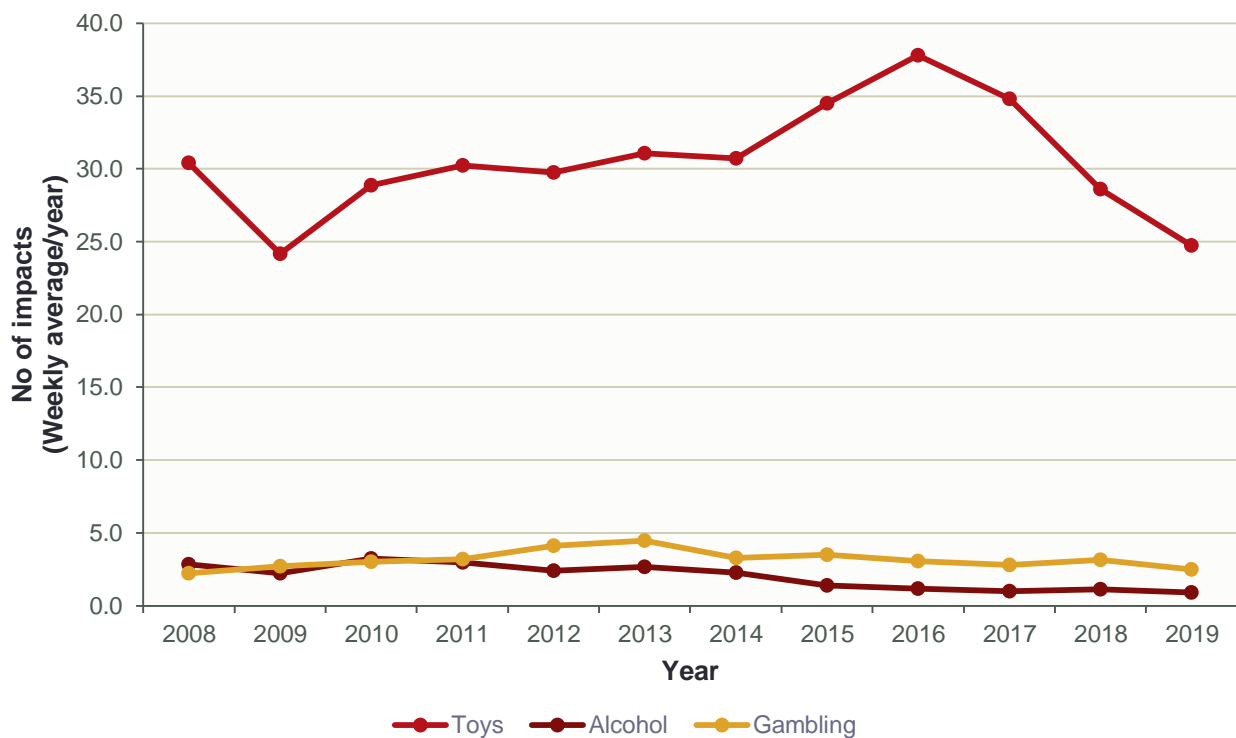
The level of children’s exposure to all TV advertising has decreased at a steady rate since the peak in 2013; between 2013 and 2019, the average number of TV ads seen by children each week has halved. Over the same period, children’s exposure to gambling advertising on television has reduced by just under half. The rate of decline in children’s exposure to all television advertising is still marginally greater than the rate of reduction in children’s exposure to gambling advertising on TV within the same period.

As noted in the previous exposure reports, the BCAP scheduling rules have not changed over the years observed in the report. Other factors, such as changes in marketing spend and behaviour, may have contributed to the changes to children’s exposure to TV ads between 2013 and 2017. But we remain confident that the scheduling rules continue to help

appropriately limit children's exposure to those ads to the extent that they ban gambling ads from appearing in children's programmes or programmes of particular to them. We will continue to closely monitor any marked changes, but in particular increases in levels, in children's exposure to gambling advertising on TV.

Children’s exposure to TV ads: comparison with TV ads for toys

The following chart contrasts children’s exposure to TV ads for toys with their exposure to TV ads for alcohol and gambling, which are the subject of this report, and is provided for context.



The chart serves to illustrate that high exposure levels can be achieved when advertisers can legitimately and specifically target their product advertising to child audiences. As illustrated above, children’s exposure to TV advertising for toys is significantly higher than their exposure to alcohol or gambling advertising on TV. The BCAP Code places restrictions on TV ads for alcohol and gambling products from being scheduled in or adjacent to children’s programmes, as well as programmes of particular appeal to them; no such scheduling restrictions are placed on TV advertising for toys.


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