



ADVERTISING STANDARDS AUTHORITY
Online Supply Pathway of Age-restricted Ads
METHODOLOGY

Online Supply Pathway of Age-restricted Ads

The ASA identified the following objectives for this project:

- To collect data to facilitate the ASA's ability to identify age-restricted ads (including those for: alcohol; gambling; foods high in fat, salt or sugar (HFSS); cosmetic intervention/weight loss products and services, etc.) served to websites and YouTube channels of particular interest to under-18s.
- To identify the intermediaries that have facilitated the distribution of those ads.

The methodologies applied in this project were selected to facilitate ASA's goal to identify instances of breaches of the Advertising Code, for further discussion with the advertiser, intermediary/intermediaries and publisher involved.

While this project included websites and YouTube channels, two distinct methodologies were used. For the websites – part of the open internet – White Bullet used its proprietary Ad Monitoring System as described below. As YouTube is a closed environment (also known as a walled garden) using Google's ad technology, a separate methodology was created.

For both parts, the ASA provided candidate websites and YouTube channels to be used for the project, and the data was collected for three months. Resulting data was shared with the ASA team via Excel spreadsheets.

1. Websites

ASA initially provided a candidate list of 93 websites that were known to be popular with 6-17-year-olds in the United Kingdom (UK), based on Comscore data.¹ From this list, 27 domains were found to be active with advertising in January 2024. These domains were supplemented with 28 additional domains from the White Bullet Made for Kids risk segment.² The final list of 55 domains (active with advertising) agreed with ASA were tracked daily in desktop and mobile ecosystems from 29 January 2024 to 29 April 2024, from the UK, using White Bullet's proprietary Ad Monitoring System.

Ad Monitoring System:

- Visits websites from local internet protocol addresses (IP addresses) to track locally served ads,
- Captures images of ads in the context of the web page,
- Uses White Bullet's proprietary technology to identify brands and advertising sectors (e.g. food, gambling, financial, fashion, travel, technology), and
- Identifies adtech intermediaries engaged in the placement of advertising (Ad Intermediaries), by analysing data on all intermediaries involved in the process of targeting, placement and delivery of ads.

¹ Comscore, Media Metrix – UK, 6-17-year-olds, September 2023

² The White Bullet Made for Kids risk segment includes domains that have content aimed at under-18s and is provided as both an exclusion list to advertisers as well as used in ad tracking for brand compliance.

Five URLs were set up for each domain, each with a different user profile described below, and all URLs were visited multiple times each day. As a result, the Ad Monitoring System automatically collected data for five profiles from each domain from both desktop and mobile daily throughout the three months, multiple times a day.

User Profiles

- *Neutral (cookieless) profile*: for collection of non-targeted ads. This gave the monitoring exercise a neutral benchmark. It was also an important stand-alone category as many consumers of digital IP-infringing content use anonymisation technology – such as VPNs and proxies – to protect their privacy and, therefore, do not visit websites with any attributable cookie profiles.
- *Female child user profile*: profile generated by visiting the top websites for under-18 females in the UK across multiple days. These websites included some from the Comscore list, some from the White Bullet Made for Kids risk segment, and others identified through research undertaken by the White Bullet team.
- *Female adult user profile*: profile generated by visiting the top websites for females aged 18 or over in the UK across multiple days. These websites were identified through research undertaken by the White Bullet team.
- *Male child user profile*: profile generated by visiting the top websites for under-18 males in the UK across multiple days. These websites included some from the Comscore list, some from the White Bullet Made for Kids risk segment, and others identified through research conducted by the White Bullet team.
- *Male adult user profile*: profile generated by visiting the top websites for males aged 18 or over in the UK across multiple days. These websites were identified through research conducted by the White Bullet team.

Web data was delivered to the ASA in Excel spreadsheet format including the following columns to facilitate the ASA with their analysis:

- Datetime – date and time that the ad was collected
- Brand – name of brand identified for the ad.
- Sector Classification – three tiers of sectors identifying the industry sector where the brand operates
- Ecosystem – whether the ad was captured in desktop or mobile web
- URL – identifies the URL on which the ad was captured
- Profile – the profile active when the ad was captured
- Ad chain – link to a file identifying domains involved in the placement of the ad
- Ad path – link to file with network calls found to be involved in the placement of the ad
- Ad creative – link to image of the ad creative captured during the visit
- Full-page screenshot – link to image of full-page screenshot where the ad was found during the visit
- Ad ID – White Bullet's internal ID for the ad
- Link ID – White Bullet's internal ID for the visit

Note that website data capture included display ads and pop-under ads.³

A total of 72,237 ads were captured from websites in the project during the three months. The ASA team used the Excel spreadsheet to narrow their focus to age-restricted ads that might be of interest for review for this project by filtering on the sector classification. They were then able to review the ad creative and full-page screenshot to evaluate whether age-restricted advertising was delivered to an under-18 user profile or to the neutral profile that might represent under-18 users. Upon request, White Bullet also assisted the ASA team in interpretation of intermediary ad path data analysis.

2. Youtube Channels

ASA initially provided a list of 156 YouTube channels that were known to be popular with persons aged 6-17 in the UK based on Comscore data for possible use in the monitoring.⁴ From this list, 20 YouTube channels with advertising were agreed for the project and tracked from 29 January 2024 to 29 April 2024 from the UK. Ad trainers logged into the YouTube channels as one of four Google ID user profiles created for the project (described below) or a neutral profile and interacted with the videos on the channels using custom scripts developed for the project. These scripts enabled them to capture the videos and automatically identify advertisers and sectors. As only Google can identify intermediaries involved in ad placement within the YouTube platform, White Bullet provided supplemental data for each visit and ad to assist ASA in any further discussions with YouTube regarding intermediaries.

User Profiles

White Bullet created multiple Google IDs for research purposes, with Google's knowledge, and then created user profiles for each of the Google IDs as outlined below. In addition, a neutral profile was used.

- *Neutral (cookieless) profile*: For collection of non-targeted ads, the ad trainers logged out of any Google ID. This gave the ad collection exercise a neutral benchmark. It was also an important stand-alone category as some consumers actively protect their privacy and, therefore, may not always use their known Google IDs with any attributable cookie profiles.
- *Female youth user profile*: Google ID female profile created with a specific date of birth in 2009, used to visit YouTube channels appropriate for the age, along with Snapchat, Instagram and TikTok videos.
- *Female adult user profile*: Google ID female profile created with a specific date of birth in 1982, used to visit YouTube channels with recipes, music and humour videos; email and auction websites; as well as home and hobby interest apps and Pinterest.
- *Male youth user profile*: Google ID male profile created with a specific date of birth in 2010, used to visit some YouTube channels appropriate for the age along with Snapchat, Instagram and TikTok videos.

³ Any video ads would appear as a display ad, as full video capture was not included in the website data component.

⁴ Comscore, Video Metrix - UK, 6-17-year-olds, September 2023

- *Male adult user profile:* Google ID male profile created with a specific date of birth in 1983, used to visit YouTube channels with football, music and humour videos; news and streaming video websites; as well as sports and other television streaming apps.

Data was provided to the ASA team in Excel format and included the following:

- Video ID – internal id for the Video captured by the system
- Ad ID – White Bullet’s internal ID for the ad served on the YouTube video
- Date – Date of the capture of the visit to the YouTube video
- Time – Time of capture of the visit to the YouTube video
- Profile – the profile active during the visit when the ad was captured
- Channel – YouTube channel where the video was captured
- Content Title – title of the YouTube video
- Ad URL – YouTube URL for the ad found on the YouTube video to allow the ASA team to review entire add if not fully captured (note that each ad running on YT videos also has its own YT URL)
- Advertiser – name of the brand identified in the ad
- Sector Classification – three tiers of sectors identifying the industry sector where the brand operates
- Ad Title – Title of the ad a submitted by the advertiser to YouTube

In addition to the Excel spreadsheet, the following supplemental data was provided to the ASA team:

- Video files: videos of the ads captured in context of the streaming video used by the ASA team in their review.
- HAR files: the HTTP Archive Format files captured the HTTP requests and responses during the interaction of the ad generation and may contain details of network calls of use to YouTube.
- Debug files: includes all information about the ads collected during visits that YouTube uses for debugging videos with various parameters that may be relevant to YouTube’s analysis of the results.

A total of 10,420 ads were captured from YouTube channels in the project during the three months. The ASA team used the Excel spreadsheet to narrow their focus to ads that might be of interest for review by filtering on the sector classification. They were then able to locate and watch the specific Video file relating to the ad to evaluate whether age-restricted advertising was delivered to an under-18 user profile or to the neutral profile that might represent under-18 users.

DOMAINS MONITORED:

- 1 quotev.com
- 2 picrew.me
- 3 online-calculator.com
- 4 neal.fun
- 5 y8.com
- 6 typingtest.com
- 7 theclashify.com
- 8 rolimons.com
- 9 photopea.com
- 10 minecraftservers.org
- 11 mathway.com
- 12 apkpac.com
- 13 sporcle.com
- 14 custom-cursor.com
- 15 mathsgenie.co.uk
- 16 userstyles.org
- 17 fortnitracker.com
- 18 songsterr.com
- 19 getrevising.co.uk
- 20 symbolab.com
- 21 calculatorsoup.com
- 22 traderie.com
- 23 coolmathgames.com
- 24 poki.com
- 25 billboard.com
- 26 physicsandmathstutor.com
- 27 ranker.com
- 28 funology.com
- 29 kidstoyyoutube.wordpress.com
- 30 kidzshowz.wordpress.com
- 31 lil-fingers.com
- 32 seventeen.com
- 33 spacemonsterskidz.wordpress.com
- 34 mariosonicgames.com
- 35 comonkids.wordpress.com
- 36 freestoriesforkids.com
- 37 sciencekids.co.nz
- 38 kidstoysgamessite.wordpress.com
- 39 mathchimp.com
- 40 bestkidswebsites.com
- 41 netart.us
- 42 fuelthebrain.com
- 43 mathplayground.com
- 44 skatinggames.org
- 45 virtualworldsforteens.com

46	math.com
47	primarygames.com
48	academickids.com
49	revisionscience.com
50	igirlgames.com
51	sesamestreet.org
52	factmonster.com
53	nickjr.co.uk
54	poptropica.com
55	cartoonnetwork.co.uk

YOUTUBE CHANNELS MONITORED

1. KickFlix
2. Smallant1
3. PrestonReacts
4. corbettmaths
5. The GCSE Maths Tutor
6. Anna McNulty
7. AliSpags
8. Ben Azelart
9. Maddie Dean
10. Modest Pelican Gaming
11. JT Casey
12. Haminations
13. Atarah Mayhew Beauty
14. Benji Krol
15. PointCrow
16. Matt Randon
17. Mr.Beast
18. Cosmic Kids Yoga
19. Ryan's World
20. Pink Fong