

Online Supply Pathway of Age-restricted Ads



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At a glance

The Study

- Through this study, the ASA found relatively few numbers of online ads for alcohol, gambling and other age-restricted ads mistargeted, in breach of the advertising rules, to websites and YouTube channels disproportionately popular with people aged 17 or younger.
- Working with cyber safety consultancy, White Bullet, we identified the advertisers, publishers and ad supply intermediaries ('the parties') that had a role in the online distribution of these ads.
- This report uniquely presents the perspectives of the parties on specific cases of ad mistargeting discovered by our proactive, automated monitoring. In doing so, the report delivers insights that should help to reduce still further children's exposure to age-restricted ads online.
- Whilst there are inherent limitations in any study of this type, our findings suggest that there was no common reason to account for the identified cases of mistargeting. Each one involved discrete case-specific factors (as opposed to systematic causes) that can be addressed by one or more of the parties and, by doing so, should help to avoid age-restricted ads from ending up on sites disproportionately popular with children.
- The relatively few breaches of the advertising targeting rules were certainly not assessed to be deliberate or, in the main part, resulting from an undue lack of care. Indeed, we saw across the range of responses from the parties that various and substantial processes were in place, and steps had been taken, to target age-restricted ads away from children in line with [CAP Guidance on Age-restricted Ads Online](#).

Monitoring

- The ASA monitored for a period of three months ads served to child, adult and neutral avatars (constructed online profiles) on 55 websites and 20 YouTube channels disproportionately popular with people aged 17 or younger.
- As the avatars visited each site multiple times a day, their 'browsing behaviours' were neither designed to be, or are, reflective of people's normal online behaviours. The avatars therefore captured many more instances of ads than would have been served, in real life, to children and adults visiting these sites. The figures that follow must be understood in that context and any extrapolation to children's and adult's exposure levels to ads generally, or age-restricted ads in particular, must be avoided.
- Over the three-month monitoring period, there were 82,657 instances when ads were served to these avatars. 133 instances only - or 0.16% of the total - related to ads for alcohol, gambling or other age-restricted ads mistargeted to a child or neutral

avatar, in breach of the advertising rules. Of these, just 50, relating to 12 advertisers, were mistargeted to a child online profile.

- Readers of the report may wish to consider these findings against the ASA's '100 Children Report'¹ and its follow-up stakeholder engagement report², which cast serious doubt on anecdotal views that children are being "bombarded" with age-restricted ads in websites and YouTube channels disproportionately popular with children.
- By researching and publishing the actual or likely level of children's exposure to ads for alcohol, gambling and high fat, salt or sugar food and drink products (including on television³) and other age-restricted ads, the ASA seeks to better inform debate about the effectiveness and the proportionality of the rules that restrict their advertising.

¹ <https://www.asa.org.uk/news/the-100-children-report.html>

² <https://www.asa.org.uk/static/e98170d5-ba0e-414e-9fb3ddb32e82537a/The-100-Children-Report-Enforcement-Final-180723.pdf>

³ <https://www.asa.org.uk/search.html?q=exposure+reports>

Introduction

The ASA's [CCTV-style quarterly monitoring](#), conducted in 2020-21, identified ads for gambling, alcohol and other age-restricted ads which were delivered, in breach of the UK Advertising Code ('the CAP Code') to **websites and YouTube channels disproportionately popular with children**. At the time, we followed up with the advertiser (the party held by the CAP Code to be primarily responsible for complying with the advertising rules), but we did not explore the roles that intermediary companies, the websites or the YouTube channels may have played in any mistargeting of the ads. For example, we did not identify and engage with demand side platforms or supply side platforms or other intermediary companies involved in the delivery pathway of the ads.

Through this study, we worked with cyber safety consultancy, White Bullet, to proactively monitor and identify, for the first time, parties other than the advertiser that have played a part in the online distribution of age-restricted ads, which were ultimately placed in breach of the CAP Code's targeting restrictions. This report features case studies which invited these parties to give their perspectives on why and how ads for gambling, alcohol etc. came to appear on websites and YouTube channels disproportionately popular with children. The insights provided at the end of this report are drawn from, and are faithful to, the responses we received following the monitoring period and, again, prior to the report's publication; the ASA did not further interrogate the accuracy of the responses, for example, by further exchanges of correspondence with the parties, or by inviting the parties to comment on each other's responses.

This study was conceived and has been delivered in the spirit of open enquiry. While the CAP Code holds advertisers primarily responsible for complying with the rules and clarifies that others involved in preparing or publishing ads also accept an obligation to abide by them, we did not set out to point a finger of blame at the parties identified in the featured case studies. Instead, our main objective was to shine a spotlight on an ad supply pathway that many stakeholders are unfamiliar with and consider to be opaque, with the principal aim of generating insights to help reduce the relatively few incidents when age-restricted ads are mistargeted to online media disproportionately popular with children.

The study also supports the ASA system's ongoing initiatives around transparency and accountability in online advertising. This report delivers insights, which we will use to support the ASA system's work in appropriately limiting children's exposure to age-restricted ads online, most obviously with a view to potentially updating the [CAP Guidance on Age-restricted Ads Online](#). The Guidance principally helps advertisers to demonstrate that they have taken adequate steps to appropriately limit under-18s' exposure to age-restricted ads in compliance with the relevant rules, for example by using a multi-layered approach using age-, topic-, keyword-, publisher content- or other demographic-based targeting controls. The Guidance is also a useful resource for digital media companies and ad technology providers which offer tools and audience information to help advertisers meet their targeting obligations under the Code.

The insights generated may also support wider discussion with the online ad industry, regulators and other interested parties to help refine regulatory policy and practice in this important area of our work.

We commissioned White Bullet to conduct the monitoring on our behalf. We worked with them to determine the websites and YouTube channels to monitor based on:

- **Audience profile:** We used data sourced from Comscore⁴. The CAP Code requires that no medium should carry age-restricted ads if more than 25% of its audience is under-16/18, depending on the category of advertised product. In this case, we selected sites/channels where the audience profile was reported as being 30% or more for people aged 6-17; we chose a percentage audience share five percentage points higher than the maximum threshold allowed by the rule (25%) to help minimise the potential for dispute with the parties we contacted. We also identified a number of additional websites based on information from White Bullet's own research into websites/YouTube channels popular with under-18s
- **Website/YouTube channel content:** We took additional steps to review the creative content of these sites to check that the content was also likely to appeal to under-18s. We reviewed the sites' style, presentation and content e.g. content containing animation, gaming and themes popular with younger children, etc.

The list of sites/channels can be found in the methodology section in Annex 2.

Findings



With our technology partner, White Bullet, the ASA monitored for a period of three months ads served to child, adult and neutral avatars (constructed online profiles) on 55 websites and 20 YouTube channels disproportionately popular with people aged 17 or younger.

As the avatars visited each site multiple times a day, their 'browsing behaviours' were neither designed to be, or are, reflective of people's normal online behaviours. The avatars therefore captured many more instances of ads than would have been served, in real life, to children and adults visiting these sites. The figures that follow must be understood in that context and any extrapolation to children's and adult's exposure levels to ads generally, or age-restricted ads in particular, must be avoided.

We monitored the sites and channels from February-April 2024. In total, we processed 10,420 ad impressions⁵ (instances) on monitored YouTube channels, and 72,237 ad impressions on monitored websites ads, and assessed them to determine which were for age-restricted products.

A total of 345 impressions - 0.4% of total number of impressions monitored - related to ads for gambling, high fat, salt or sugar food and drink (HFSS), alcohol, e-cigarettes and weight-loss products. 83 of these impressions were served to the Neutral profile, 31 to the under-

⁴ Taken from Comscore data, September 2023.

⁵ Ad impressions provide a measure of the number of times an ad is served.

18 Young Female profile and 19 to the under-18 Young Male profile. The remaining majority, 212, related to the adult profiles.

Of the 345 impressions, 133 or 0.16% of the total were for age-restricted ads received by a child or neutral profile; this would indicate that the related ads had not been sufficiently targeted away from children as advised by [CAP Guidance on Age-restricted Ads Online](#). These 133 impressions related to age-restricted ads from 38 advertisers: 20 for HFSS, 10 for gambling, 4 for weight-loss, 2 for alcohol and 2 for e-cigarette products. We did not find any ads for cosmetic surgery, a category of ads that the CAP Code also places targeting restrictions on.

Breaking this down further, the 50 impressions served to a child profile over the three-month period accounted for just 0.06% of the total number of impressions. These 50 impressions related to age-restricted ads from 12 advertisers: 2 for HFSS, 6 for gambling, 2 for weight-loss, 0 for alcohol and 2 for e-cigarette products. While the number of age-restricted ads mistargeted at the child or neutral profile were relatively small, we intend learnings from this exercise to help reduce children's exposure to these ads still further.

Readers of the report may wish to consider these findings against the ASA's '100 Children Report'⁶ and its follow-up stakeholder engagement report⁷, which cast serious doubt on anecdotal views that children are being "bombarded" with age-restricted ads in websites and YouTube channels disproportionately popular with children. By researching and publishing the actual or likely level of children's exposure to ads for alcohol, gambling and high fat, salt or sugar food and drink products (including on television⁸) and other age-restricted ads, the ASA seeks to better inform debate about the effectiveness and the proportionality of the rules that restrict their advertising.

This study does not provide commentary on the outstanding 99.6% of ad impressions monitored over the three months period other than to confirm they did not relate to advertisements for products that incur a targeting restriction under the CAP Code. The ads may have related to, for example, household goods, travel services, insurance products, telecoms services or other categories of advertisements that do not contain risk factors meriting targeting restrictions under the CAP Code. While the ASA's experience is that the overwhelming majority of ads comply with the UK advertising codes, this study provides no commentary on the conformity of the ads, responsible for the 99.6% of ad impressions, with the CAP Code.

The following case studies relate to ads that had been served to a child or neutral avatar audience profile, and therefore seemingly not targeted away from children. We contacted all the parties identified as having played a role in the delivery and publication of the ad, and the case studies provide a summary of what we found in each example. Again, the primary purpose is not to point a finger of blame at the parties featured, but to explore examples that would provide us with valuable insights into the ad supply pathway of mistargeted age-

⁶ <https://www.asa.org.uk/news/the-100-children-report.html>

⁷ <https://www.asa.org.uk/static/e98170d5-ba0e-414e-9fb3ddb32e82537a/The-100-Children-Report-Enforcement-Final-180723.pdf>

⁸ <https://www.asa.org.uk/search.html?q=exposure+reports>

restricted ads. The co-operation of the named parties has allowed us to gain a unique insight into this process, and the responses of all the parties should be taken in the spirit of their commitment to minimising children’s exposure to age-restricted ads.

The ASA will be contacting all of the advertisers that we identified as having served an ad to the child or neutral avatars on the back of this report.

Avatar profiles explained

The ASA used **5** Avatars representing the online profiles of...



Female Child
(DOB: 2009)

Profile generated by visiting the top websites for under-18 females in the UK across multiple days.



Male Child
(DOB: 2010)

Profile generated by visiting the top websites for under-18 males in the UK across multiple days.



Neutral Profile
(Cookie-less)

Profile used for the collection of non-targeted ads, to give the monitoring exercise a neutral benchmark. Profile was not logged in.



Adult Female
(DOB: 1982)

Profile generated by visiting the top websites for females aged 18 or over in the UK across multiple days.



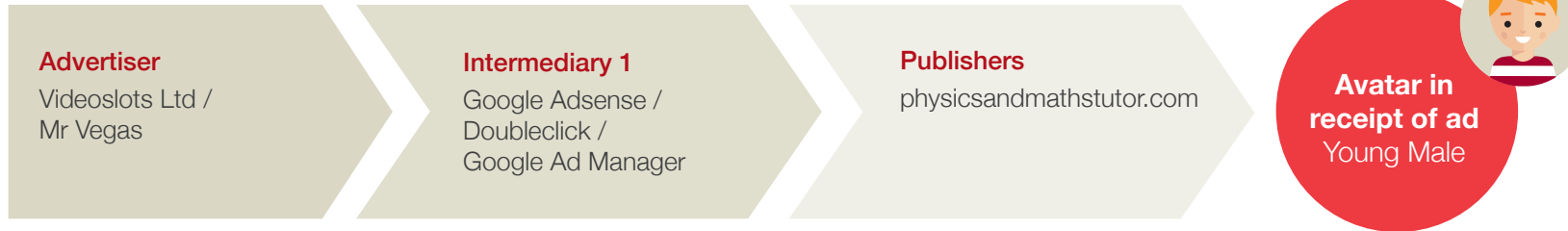
Adult Male
(DOB: 1983)

Profile generated by visiting the top websites for males aged 18 or over in the UK across multiple days.

Case study 1: Mr Vegas (gambling ad)

The ASA identified an ad for Mr Vegas' gambling services appearing on Physicsandmathstutor.com, a website aimed at GCSE and A-Level students. We were able to detect three parties in the supply pathway of this ad and asked each one for their perspective.

Ad pathway:



Advertiser, intermediary and publisher responses:

Videoslots Ltd t/a Mr Vegas

Videoslots explained that the campaign was managed by their programmatic partner N365, which used a pre-vetted 'allow list' of 394 domains, stringent category exclusions, and a smart bidding strategy designed to avoid targeting underage audiences.

After further investigation it was determined that physicsandmathstutor.com was inadvertently included due to an alleged misclassification on the publisher's end as "Reference and directory", which did not reflect it being a children's site. The correct classification should have been "IAB5 Education".

Videoslots explained that they have consistently utilised a range of measures to comply with the CAP Code, including daily monitoring processes, a pre-vetted list of domains, stringent category exclusions, and a smart bidding strategy designed to avoid targeting underage audiences. They have further intensified their daily monitoring processes to ensure even more rigorous scrutiny of media placements for Mr Vegas ads.

Google

Google explained that its involvement in this process was restricted to Google Ad Manager being the Supply Side Platform used by the publisher, Physicsandmathstutor.com to automate the selling of the ad space on its website.

Physicsandmathstutor.com

The website explained that most of the ads it hosted came through Google. They provided evidence that 'Alcohol' and 'Gambling & Betting' categories were selected as 'blocked' on the service.

Looking through the other categories available they noticed that 'Social Casino Games' were not blocked, so this was likely the source, and they had now blocked this.

They noted that they used other networks who had similar blocking capabilities, and from conversations with these networks they understood that it was challenging to block all ads accurately due to reliance on advertiser classifications and multiple intermediaries.

ASA summary

On the basis of the information provided, the ASA considered the instance may have been averted if one or more of the following steps had been taken:

- The site had been correctly categorised as 'Education'.
- All possible gambling-related options, such as casino games, were blocked by the publisher on the Google Ad network list
- The advertiser, including through parties directly or indirectly contracted by it, periodically carried out monitoring checks of site content and did not rely solely on the publisher's classification.

Case study 2: Archers (Alcohol ad)

The ASA identified an ad for Archers Peach, an alcohol product appearing on the SmallAnt YouTube channel, where over 30%⁹ of the audience was under 18 years of age. We were able to detect three parties in the supply pathway of this ad and asked each one for their perspective.

Ad pathway:



Advertiser, intermediary and publisher responses:

De Kuyper Royal Distillers

De Kuyper explained that the ad was set exclusively to deliver to people aged 25-34. They noted that YouTube labels content as suitable for different audiences, but classifications are broad, and you can only exclude from their inventory.

They noted YouTube does not allow “not suitable” for a specific audience, they say “Children”, “Families” and “Adults”. They advised that, in their view, settings are not foolproof in preventing individual targeting.

They advised that their ad content has the flag “alcohol” with YouTube and they always flag accordingly. They noted that, in their opinion, YouTube does not currently offer a foolproof way to completely exclude delivery on channels with high proportion of under-18s.

De Kuyper noted that they take their responsibility of responsible advertising for its brands and products very seriously. As a company they find it very important to ensure that their brands and products are enjoyed responsibly, and they therefore confirmed that they will take further actions to closer monitor and identify audiences, including undefined age profiles.

Google

Google confirmed it offered advertisers a one-click option that allows them to opt out of Made for Kids or child-directed content on YouTube and publishers using AdSense. Similarly, publishers who use AdSense to monetise their content, have the ability to notify them that their content should be designated as child-directed. Where content is designated as Made for Kids or child-directed, they will apply controls on the type of ads that will be served against that content. This includes preventing ads in sensitive categories.

They also offered default controls within the system which prevent the targeting of under-18s, specifically the absence of targeting options for:

- under-18s (across any content they may be viewing); or
- for Made for Kids content (regardless of the viewer).

Further controls could also be used to define specific groups an advertiser wants to avoid, such as demographic, content, keywords and topics and selecting ads being ineligible for Made for Kids content.

SmallAnt

SmallAnt did not respond to the ASA's enquiries.

ASA summary

On the basis of the information provided, the ASA considered the instance may have been averted if one or more of the following steps had been taken:

- The advertiser, including through any parties directly or indirectly contracted by it, had periodically reviewed the audience composition of the publisher channel.
- Blocklists were updated when audience data indicated channels with a disproportionate proportion of under-18s in the audience.
- The channel was correctly categorised as ‘Made for Kids’ or designated as child-directed.

⁹ Taken from Comscore data, September 2023.

Case study 3: Skybet (gambling ad)

The ASA identified an ad for Skybet gambling services appearing on Rolimons.com, a Roblox website where over 30%¹⁰ of the audience was under 18 years of age. We were able to detect three parties in the supply pathway of this ad and asked each one for their perspective.

Ad pathway:



Advertiser, intermediary and publisher responses:

Bonne Terre Ltd t/a Skybet

Sky Bet explained that this ad was published by an 'affiliate partner'. Sky Bet do not permit third party partners to conduct any in-app or display activity on Sky Bet's behalf and affiliates must abide by its comprehensive guidelines.

Sky Bet reassured the ASA that it is committed to compliance with the Advertising Codes, and it took prompt action to terminate its relationship with the affiliate partner in question upon receipt of the ASA's letter.

Additionally, Sky Bet reminded all affiliate partners of their obligation to comply with its guidelines at all times. They assured us that they operated extensive controls for in-house display ads and are not solely reliant on third party controls. Ads are only served on websites which are listed on a pre-vetted inclusion list. Additionally, they:

- Used Comscore data to vet audience demographics before adding a website to this list, which is also manually reviewed by their Compliance team.
- They worked to a 20% under-18 threshold rather than 25%.

Kayzen

Kayzen did not respond to the ASA's enquiries.

Rolimons.com

Rolimons explained that they have had the gambling ads category disabled for years in Google Ads Manager, and that they block gambling ads via the IAB category through Geoedge and Confiant as a category. They were therefore unsure how a gambling ad had appeared on their site.

ASA summary

On the basis of the information provided, the ASA considered the instance may have been averted if the affiliate party had not operated outside of its agreement with the advertiser.

¹⁰ Taken from Comscore data, September 2023.

Case study 4: Space Sweets (Ad for food product high in fat, salt or sugar)

The ASA identified an ad for Space Sweets, a freeze-dried sweet company whose products were HFSS (High in Fat, Salt or Sugar) appearing on Fuelthebrain.com, a website for educational games the content of which is primarily aimed at, or commissioned for, an under-16 audience. We were able to detect three parties in the supply pathway of this ad and asked each one for their perspective.

Ad pathway:



Advertiser, intermediary and publisher responses:

Space Sweets Ltd

Space Sweets investigated this incident with its media agency. They noted that it was a Google display ad and that they were unable to control the specific websites Google serves to.

They had reviewed their settings and ensured they had opted out from serving ads with content “suitable for families” and “teen and older audience”. They hoped this would prevent any further issues.

Google

Google referenced their policy for ads for food and soft drink high in fat, salt or sugar (HFSS) which outlines the requirement that advertisers must self-declare that they are using an account to run HFSS campaigns. Google confirmed that they had taken enforcement action on this advertiser in line with this policy.

Fuelthebrain.com

Fuelthebrain.com did not respond to the ASA's enquiries.

ASA summary

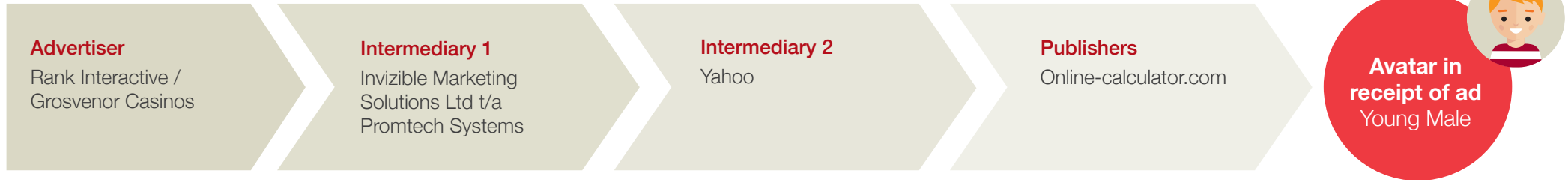
On the basis of the information provided, the ASA considered the instance may have been averted if one or more of the following steps had been taken:

- The advertiser had self-declared that they are using an account to run HFSS campaigns
- The advertiser ensured it had opted out from all relevant child-directed sites to ensure age-restricted ads were kept away from children.
- The site was correctly classified by the publisher as ‘Education’.

Case study 5: Grosvenor Casinos (gambling ad)

The ASA identified an ad for Grosvenor Casinos gambling services appearing on Online-calculator.com, a website where over 30%¹¹ of the audience was under 18. We were able to detect four parties listed below in the supply pathway of this ad and asked each one for their perspective.

Ad pathway:



Advertiser, intermediaries and publisher responses:

Rank Interactive / Grosvenor Casinos

Rank Interactive confirmed that they had suspended Online-calculator.com from its marketing, and explained that they used the buying platform, and other third-party data providers, to verify user demographics and ensure ads are only shown to users who meet the required age thresholds. Additionally, audience compositions were regularly analysed using tools like Similarweb to ensure compliance with age restrictions. Further steps taken included:

- Use of exclusion lists: Websites identified as having significant underage audiences are blocklisted to prevent ads from being served.
- Continuous monitoring and reviewing to ensure compliance with all relevant regulations. Any anomalies or breaches are promptly investigated, and corrective actions are taken immediately.

Rank Interactive noted that there may be rare scenarios where systems may not fully prevent underage exposure (e.g., multiple age groups using the same device or users misreporting their age). When these cases are identified, immediate action is taken by the agency to prevent future occurrences.

They explained that they placed the ad through Invizible Marketing Solutions Ltd, their media buying partner. They understood Promtech Systems was a trading company of Invizible. They understood that Invizible buy inventory from 50+ exchanges available to buy inventory via Yahoo, DV360 and most other Demand Side Platforms.

Yahoo

Yahoo explained that it no longer has a business relationship with Promtech Systems Limited, the Demand Side Platform (DSP) seat holder that booked the ad. Yahoo promptly blocked the publisher site online-calculator for any advertising booked through the Yahoo DSP.

Yahoo operates a global blocklist where it directs programmatic ads in high-risk categories away from sites that are known to attract younger audiences, so that regardless of whether the DSP seat holder is correctly targeting only an 18+ audience, their ad should not appear on youth-focused sites. However, the publisher site in question online-calculator.com was not obviously directed at under-18s and therefore was not picked up by this process. Yahoo committed to investigate whether similar sites of this nature should be added to the blocklist.

Invizible Marketing Solutions Ltd t/a Promtech Systems

Promtech Systems contacted the ASA expressing a commitment to the Code and working with the ASA to ensure any issues were resolved.

Online-calculator.com

The website noted that they don't directly deal with advertisers, but they can control categories and provided screenshots of Alcohol and Gambling being set to "blocked". They stated that a large number of users are under 18 so they advise they don't allow ads of this nature on their site.

They assured the ASA that they would continue to work with their Ad Agency controls to stop future ads.

ASA summary

On the basis of the information provided, the ASA considered the instance may have been averted if one or more of the following steps had been taken:

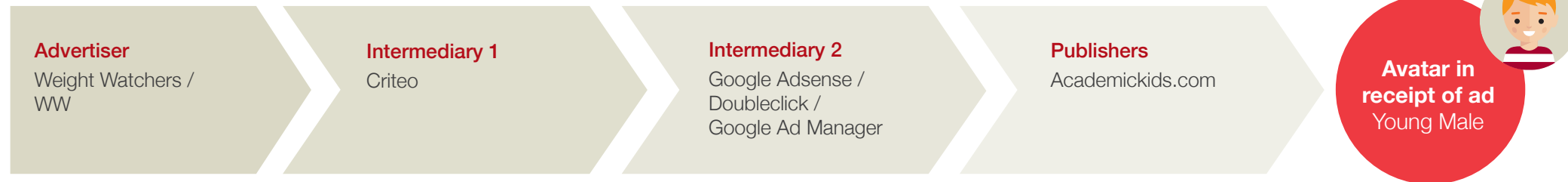
- The advertiser, including through any parties contracted by it, had periodically reviewed the audience composition of the publisher site.
- The advertiser, including through any parties contracted directly or indirectly by it, added to publisher blocklists when audience data showed sites with a disproportionate audience share of under-18s.

¹¹ Taken from Comscore data, September 2023.

Case study 6: Weight Watchers (Slimming, weight loss ad)

The ASA identified an ad for Weight Watchers services appearing on Academickids.com, an educational website aimed at an under-18 audience. We were able to detect four parties in the supply pathway of this ad and asked each one for their perspective. Criteo were identified to us after contacting the advertiser.

Ad pathway:



Advertiser, intermediaries and publisher responses:

Weight Watchers

Weight Watchers expressed its commitment to the Code and explained that UK banner ads go through The Trade Desk, Taboola and Criteo – all are given a target audience of male/female aged 25-54.

They identified that this ad was served through Criteo, who did not have the direct capability to restrict advertising to individuals under-18 and could only limit sites using a blocklist.

Criteo

Criteo noted it was committed to ensure a trusted and safe advertising experience to all its partners, marketers and media owners alike. They highlighted their [supply partner guidelines](#), which all Criteo partners must adhere to and they take any breach of its policies very seriously. They noted that the website Academickids.com was raised to their attention earlier this year, and following review, it was found in breach of their policies and more specifically against Section 1.3 *Children's Sites*, and was globally blocked across all their technologies. Criteo has not displayed ads on this site since then.

Criteo noted that its direct supply partners are vetted before launch. Such a website should not have passed its review for their direct supply, but in this case, Criteo accessed this inventory through a global platform partners (Supply Side Platforms (SSP)) where their processes and controls are different due to the nature of such partners. Criteo noted it relies on its SSP partners to adhere to its guidelines and work closely with them to administer their global inventory controls (lists of domains and apps found in breach of our guidelines and blocked across platforms). Criteo noted it has systems in place to monitor its supply and ensure that it is aligned to its standards, but children directed domains are complex to detect and, in this case, the SSP partner in question did not meet their policies and should have ensured Criteo did not access this domain.

Google

Google explained that its involvement in this process was restricted to Google Ad Manager being the SSP used by the publisher Academickids.com to automate the selling of the ad space on its website.

Academickids.com

Academickids.com did not respond to the ASA's enquiries.

ASA summary

On the basis of the information provided, the ASA considered this instance may have been averted if one or more of the following steps had been taken:

- The advertiser, including any parties directly or indirectly contracted by it, had periodically reviewed the audience composition of the publisher site.
- Blocklists were updated when audience data showed sites showing a disproportionate audience share of under-18s.
- SSPs and the publisher itself had correctly classified the site as 'Education'.

Case study 7: McDonald's (Ad for food product high in fat, salt or sugar)

The ASA identified an ad for McDonald's McSpicy, a product which was HFSS (High in Fat, Salt or Sugar) appearing on the Anna McNulty YouTube channel, where over 30%¹² of the audience was under 18 years of age and where we assessed the content of the channel to be mainly directed at persons under 18 years of age. We were able to detect three parties in the supply pathway of this ad and asked each one for their perspective.

Ad pathway:



Advertiser, intermediary and publisher responses:

McDonald's

McDonald's explained that they take compliance with the Code extremely seriously and noted that the Anna McNulty YouTube channel was classed as 'Lifestyle and Fitness' not children's content.

They queried the audience data provided and stated their data suggested the make-up of the channel was 77% adult. They advised that the figure of 77% being 18 years old or above came from the Google / YouTube forecasting tool called 'Inventory Availability' and understood from their media agency that this was the only tool available to them to provide a quantifiable breakdown.

An agency used by McDonald's had seen data from Tagger showing an under-18 audience of 19%. They had therefore placed this ad in good faith taking into account the information available.

McDonald's had stopped ads on this channel as a gesture of goodwill.

Google

Google offered advertisers a one-click option that allows them to opt out of Made for Kids or child-directed content on YouTube and publishers using AdSense. Similarly, publishers who use AdSense to monetise their content, have the ability to notify them that their content should be designated as child-directed. Where content is designated as Made for Kids or child-directed, they will apply controls on the type of ads that will be served against that content. This includes preventing ads in sensitive categories.

They also offered default controls within the system which prevent the targeting of under-18s, specifically the absence of targeting options for:

- under-18s (across any content they may be viewing); or
- for Made for Kids content (regardless of the viewer).

Further controls can be used to define specific groups an advertiser wants to avoid, such as demographic, content, keywords and topics and selecting ads being ineligible for Made for Kids content.

Anna McNulty

Anna McNulty did not respond to the ASA's enquiries.

ASA summary

On the basis of the information provided, the ASA considered this instance may have been averted if one or more of the following steps had been taken:

- The channel was correctly classified by Anna McNulty as 'Made for Kids' or child-directed.
- The advertiser, including parties directly or indirectly contracted by it, had periodically reviewed the audience composition of the publisher channel and the content of the site.

¹² Taken from Comscore data, September 2023.

Case study 8: 888casino (gambling ad)

The ASA identified an ad for 888casino, a gambling product which appeared on the Ben Azelart YouTube channel, where over 30%¹³ of the audience was under 18 years of age. We were able to detect three parties in the supply pathway of this ad and asked each one for their perspective.



Ad pathway:



ASA summary

On the basis of the information provided, the ASA considered this instance may have been averted if one or more of the following steps had been taken:

- The advertiser, including parties directly or indirectly contracted by it, had periodically reviewed the audience composition of the publisher channel.
- Blocklists were updated when audience data showed sites showing a disproportionate share of under-18s in the audience.
- The channel was correctly classified as ‘Made for Kids’ or child-directed.

Advertiser, intermediary and publisher responses:

888 Holdings Ltd

888 Holdings explained that its YouTube ads were uploaded via the Google Ads process. They advised Google Ads to ensure the ads appear where they are supposed to and on channels where gambling ads have been accepted.

They explained that they undertook a multi-layered approach to ensure responsible advertising, which included:

- **User-Centric Targeting:** described as the cornerstone of their advertising strategy on YouTube. Ads are targeted to specific users, not channels. This means that even if a channel had a predominantly younger audience (e.g. Ben Azelart), those viewers should not see their ads unless they individually meet their strict targeting criteria; an approach based on the user's profile rather than the channel's overall demographic.
- **Age Verification:** Their ads should only be shown to logged-in users who have confirmed they are over 25 years old. (888 Holdings Ltd provided screen-grab information to this end, and has sought a fuller understanding of the methodology underlying the ASA ‘young female avatar’ in receipt of the ad.)
- **Content Exclusions:** In addition to age verification, their ads should only be visible on channels that have actively selected to accept gambling ads and are not classified as having appeal to family and kids.
- **Real-time Bidding:** The ad serving process happens in real-time, based on the individual user's profile, independent of the channel's overall audience demographics.
- **Demographic Data:** Their data for the period that the ad was seen demonstrated that no one under the age of 25 viewed their ads.
- **Additional Precautions:** They have taken further steps to exclude their ads from the specific channels mentioned in the report.

Google

Google offered advertisers a one-click option that allows them to opt out of Made for Kids or child-directed content on YouTube and publishers using AdSense. Similarly, publishers who use AdSense to monetise their content, have the ability to notify them that their content should be designated as child-directed. Where content is designated as Made for Kids or child-directed, they will apply controls on the type of ads that will be served against that content. This includes preventing ads in sensitive categories.

They also offered default controls within the system which prevent the targeting of under-18s, specifically the absence of targeting options for:

- under-18s (across any content they may be viewing); or
- for Made for Kids content (regardless of the viewer).

Further controls can be used to define specific groups an advertiser wants to avoid, such as demographic, content, keywords and topics and selecting ads being ineligible for Made for Kids content.

Ben Azelart

Ben Azelart's representatives explained that he had no control over the ads on his YouTube channel.

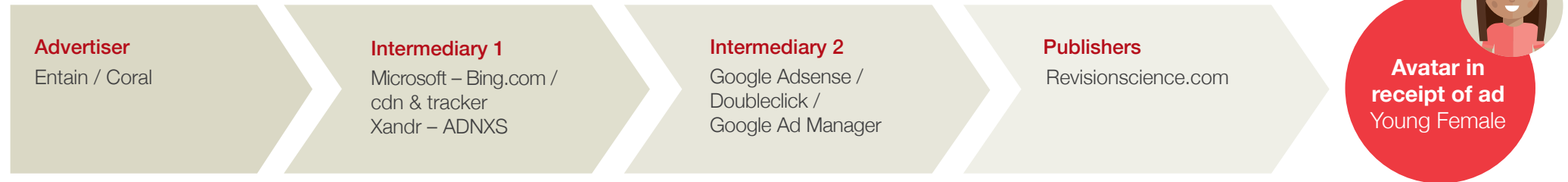
However, they noted that he had no gambling ads enabled on his channel, so were unable to advise on how this ad might have appeared.

¹³ Taken from Comscore data, September 2023.

Case study 9: Coral (gambling ad)

The ASA identified an ad for Coral's gambling services appearing on Revisionscience.com, a website aimed at GCSE and A-Level students. We detected four parties in the supply pathway of this ad and reached out to each one for their perspective.

Ad pathway:



Advertiser, intermediaries and publisher responses:

Entain t/a Coral

Entain explained that they took compliance with the Code extremely seriously, and after conducting their own internal monitoring they had also identified instances where their ads had appeared on sites where children made up a high proportion of the audience. They proactively notified the Committee of Advertising Practice (sister body of the ASA) and informed us that they had likewise notified the Gambling Commission of their findings in April, 2024. They noted the issues came from their programmatic ad partnership with Microsoft.

Circa 99% of their ads with Microsoft were served on Outlook without issue as Outlook's targeting ensures ads are served on only logged-in age verified 18+ accounts. With the remaining Microsoft inventory outside Outlook (c. 1%) they updated a blacklist weekly to help ensure ads were only served on desired sites. Their investigation established that it was with this inventory outside Outlook that the ad on Revisionscience.com was served. As a result, they had:

- Suspended activity with Microsoft until such time as they had developed a whitelist functionality for any inventory served outside Outlook.
- Used Outlook targeting (an ad-supported product that uses a variety of factors to target ads to users) to ensure they reached only logged-in age-verified 18+ accounts.
- Specifically aimed campaigns at users aged 25+ through Audience Targeting Precision.
- Continued to use Entain's 'Customer Data Platform' which can exclude individuals and groups (e.g. self-excluded or opt-out individuals) from the target audience.

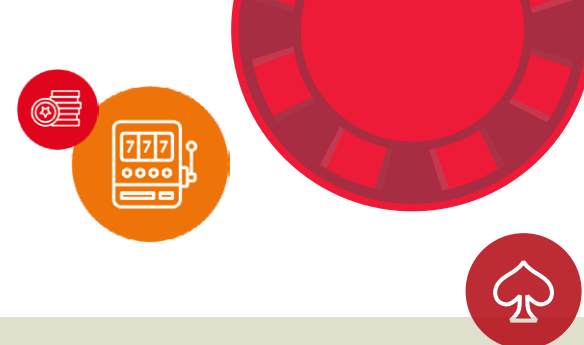
Microsoft Bing (inc. Xander – ADNXS)

Microsoft explained that the Microsoft Ad Tech Platform provides ad buyers and sellers with a variety of features, which include the following:

- Categorisation features for inventory sellers (i.e. sellers of ad space on digital media) to identify (and, as appropriate, exclude) child-directed sites and apps; and categorisation features for advertisers to designate ads by their content category, and
- Audit controls that provide an independent assessment of both ads and inventory.
- A Children's Privacy Policy that requires inventory sellers to "identify child-directed sites and apps using the existing categorisation functionality" as a signal to ad buyers. Buyers are aware of this designation when they purchase inventory through the platform.
- Ad Quality Profile Settings, allows inventory sellers to set up brand and category blocks for sensitive content such as gambling, in line with their legal or regulatory requirements.
- Prohibition on the targeting of users under-18. Where age determination is not available, the platform offers the above controls to avoid inappropriate ad delivery.

continued...

Case study 9: Coral (gambling ad)



Advertiser, intermediaries and publisher responses:

Google

Google explained that its involvement in this process was restricted to Google Ad Manager being the Supply Side Platform used by the publisher, Revisionscience.com to automate the selling of the ad space on its website.

Revisionscience.com

The website explained that all programmatic advertising carried by them comes from Google AdSense and that they have no way of knowing what ads got served on their platform.

They noted that they always blocked restricted ad categories in their AdSense account and so gambling ads should have been restricted. They were unhappy that a gambling ad had been served on their site and would be working with Google AdSense to ensure this didn't happen again.

ASA summary

We were encouraged by Entain's proactive approach to monitoring the reach of its advertising and noted that they had contacted the ASA and, reportedly, the Gambling Commission prior to receiving our correspondence to let us know the findings of their own enquiry and the actions resulting from them.

On the basis of the information provided by the parties, the ASA considered that this instance may have been averted if one or more of the following steps had been taken:

- The advertiser had, including through parties directly or indirectly contracted by it, periodically reviewed the audience composition of the publisher site.
- Blocklists had been updated when audience data identified sites disproportionately popular with under-18s.
- The site, Revisionscience.com, had been correctly categorised as 'Education'.

Insights

The Study

- Through this study, the ASA found relatively few numbers of online ads for alcohol, gambling and other age-restricted ads mistargeted, in breach of the advertising rules, to websites and YouTube channels disproportionately popular with people aged 17 or younger.
- Working with cyber safety consultancy, White Bullet, we identified the advertisers, publishers and ad supply intermediaries ('the parties') that had a role in the online distribution of these ads.
- This report uniquely presents the perspectives of the parties on specific cases of ad mistargeting discovered by our proactive, automated monitoring. In doing so, the report delivers insights that should help to reduce still further children's exposure to age-restricted ads online.
- Whilst there are inherent limitations in any study of this type, our findings suggest that there was no common reason to account for the identified cases of mistargeting. Each one involved discrete case-specific factors (as opposed to systematic causes) that can be addressed by one or more of the parties and, by doing so, should help to avoid age-restricted ads from ending up sites disproportionately popular with children.
- The relatively few breaches of the advertising targeting rules were certainly not assessed to be deliberate or resulting from an undue lack of care. Indeed, we saw across the range of responses from the parties that various and substantial processes were in place, and steps had been taken, to target age-restricted ads away from children in line with [CAP Guidance on Age-restricted Ads Online](#).

Monitoring

- The ASA monitored for a period of three months ads served to child, adult and neutral avatars (constructed online profiles) on 55 websites and 20 YouTube channels disproportionately popular with people aged 17 or younger.
- As the avatars visited each site multiple times a day, their 'browsing behaviours' were neither designed to be, or are, reflective of people's normal online behaviours. The avatars therefore captured many more instances of ads than would have been served, in real life, to children and adults visiting these sites. The figures that follow must be understood in that context and any extrapolation to children's and adult's exposure levels to ads generally, or age-restricted ads in particular, must be avoided.
- Over the three month monitoring period, there were 82,657 instances when ads were served to these avatars. 133 instances only - or 0.16% of the total - related to ads for alcohol, gambling or other age-restricted ads mistargeted to a child or neutral

avatar, in breach of the advertising rules. Of these, just 50, relating to 12 advertisers, were mistargeted to a child online profile.

- Readers of the report may wish to consider these findings against the ASA's '100 Children Report'¹⁴ and its follow-up stakeholder engagement report¹⁵, which cast serious doubt on anecdotal views that children are being “bombarded” with age-restricted ads in websites and YouTube channels disproportionately popular with children.
- By researching and publishing the actual or likely level of children’s exposure to ads for alcohol, gambling and high fat, salt or sugar food and drink products (including on television¹⁶) and other age-restricted ads, the ASA seeks to better inform debate about the effectiveness and the proportionality of the rules that restrict their advertising.

Whilst there are inherent limitations in any study of this type, the findings from our monitoring exercise would suggest that there was no common reason for the identified cases of mistargeting. Each one involved discrete case-specific factors (as opposed to systematic causes) that can be addressed by one or more of the parties and, by doing so, should help to avoid age-restricted ads from ending up on sites disproportionately popular with children. The case studies indicate that in most cases, advertisers and others involved had taken steps to prevent such outcomes and any breaches of the Code were certainly not assessed to be deliberate or resulting from an undue lack of care.

Encouragingly we saw across the range of responses we received that various and substantial processes were in place, and steps had been taken by advertisers, intermediaries and publishers to target age-restricted ads away from children and children’s media in line with [CAP Guidance on Age-restricted Ads Online](#).

However, some themes emerged from the case studies that help to explain why, in those cases, age-restricted ads were mistargeted to sites disproportionately popular with children and delivered to a child or neutral profile. These included mis-categorisation or otherwise inadequate categorisation of the age-restricted ad by the advertiser, its agency or other parties contracted directly or indirectly by them (which, if categorised correctly, would have signified the age-restricted nature of the ad); omitting to include, on the basis of regular monitoring or other means, sites disproportionately popular with children in suitably comprehensive blocklists; and, mis-categorisation or otherwise inadequate categorisation by the publisher or other parties contracted by it of the audience profile and/or the audience-directed content of the sites (which, if categorised or content-assessed correctly, would have signified the site was not an appropriate destination for an age-restricted ad). On the latter theme, we understood the difficulty faced by channels/websites that had *not* originally set out to appeal particularly to children, but had in the course of time attracted an

¹⁴ <https://www.asa.org.uk/news/the-100-children-report.html>

¹⁵ <https://www.asa.org.uk/static/e98170d5-ba0e-414e-9fb3ddb32e82537a/The-100-Children-Report-Enforcement-Final-180723.pdf>

¹⁶ <https://www.asa.org.uk/search.html?q=exposure+reports>

audience disproportionately composed of children. This is where it was especially important to ensure that channels and websites were actively monitoring their audience profiles on an ongoing basis, and making sure that they categorised themselves as 'Made for Kids', having child-directed content or equivalent if data showed their sites regularly attracted a disproportionate amount of under-18's in the audience.

More specifically our study drew out the following points from advertisers, intermediaries and publishers:

Advertisers referred to:

- A deficiency or a specific accountability on the part of their programmatic ad partners e.g. an agency; demand side platform; ad exchange etc.
- A publisher failing to classify their site correctly e.g. classifying a site as "reference and directory", when classification as "IAB5 Education", for example, would have better reflected the content of the site and likely prevented an age-restricted ad from being served on the site.
- An administrative error e.g. unintentionally ticking 'partner network' box, when that network included digital media assets (for example, websites) disproportionately popular with children and therefore unsuitable to 'target' with age-restricted ads.
- One or more limitations on intermediaries' targeting tools, making it difficult to exclude with confidence sites attracting a disproportionate audience of under-18s. For example, a reliance on third party blocklisting in the absence of more nuanced, robust audience age data.
- An affiliate partner breaking contract terms.
- A reliance on the 'buying' platform, data providers and audience composition assessors to exclude younger audiences
- An emphasis on the importance of continual improvement: recognising that occasional mistargeting will occur from time-to-time, prompting a need to update processes accordingly, for example adding a site to a blocklist.
- A reliance on an intermediary audience composition forecasting tool, for example, predicting an under-18 audience composition at clear odds with data such as that provided by Comscore or comparable providers.

Intermediaries referred to:

- Consistent messaging that tools are available to, and accountability policies fall on, advertisers, their agencies and publishers: when tools are used properly and policies are adhered to, mistargeting of age-restricted ads is unlikely to occur.
- Publishers either not self-classifying or inadequately self-classifying the audience composition or content-directed nature of their sites as being made for or popular with children.
- Use of audit controls to provide independent assessment of ads and inventory to support advertisers and publishers to avoid inappropriate targeting.
- The fact that, occasionally, it is not obvious to an intermediary body, from the style, content, presentation etc of a site, that the site is disproportionately popular with children: when identified, such sites are added to a global blocklist, which ensures age-restricted ads are directed away from children.

- Failure of upstream intermediaries to better characterise, categorise or filter age-restricted ads.

Publishers referred to:

- A deficiency or a specific accountability on the part of their programmatic ad partners; for example, ineffective blocking of categories of age-restricted ads.
- A deficiency on the part of advertiser or agency classifications of ads and advertisers' known or inadvertent use of multiple intermediaries, causing difficulties for the publisher to block ads.
- Overlooking the blocking of relevant, specific ad categories, for example 'social casino games', owing to relying on broader classifications, for example 'gambling', to block a broad range of age-restricted ads.
- Some puzzlement as to why policies and intermediary tools (for example, deselecting gambling ads) to prevent age-restricted product ads from appearing on the publisher's site, had – ultimately - proved ineffective leading to a pledge to work further with ad partners to stop future ads.

The ASA was encouraged by the positive engagements from the various intermediaries throughout this process. With the ASA's continued objective of building a culture of zero tolerance for age-restricted ads appearing in children's online environments, we will continue to undertake similar monitoring exercises in the future.

Annex 1: Example letter sent to intermediary

Dear X

Ads for gambling directed to people under 18 – action required

We are writing to let you know that we have identified a non-compliant ad, which we understand your company was involved in the delivery of. We need a response from you to help us address this issue. All the information you need to provide a response is set out below.

The ad listed below breaches the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing ('the Code'), which bans ads for certain product categories¹ from being directed at people under 18 through the selection of media or the context in which they appear. No medium should be used to advertise gambling products if more than 25% of its audience is under 18 years of age. As the content of these websites is primarily aimed at an under 18 audience, the media placement of the ads is in breach of the Code.

Who we are

We are the Advertising Standards Authority (ASA), the UK's independent advertising regulator. The ASA makes sure ads across UK media comply with the UK Advertising Codes. The Committee of Advertising Practice (CAP) is the sister organisation of the ASA and is responsible for writing the Codes and guidance to help marketers comply with them.

The ASA responds to complaints and proactively monitors ads to police compliance with the Code. You can read more about the UK advertising regulatory system on the ASA [website](#).

Project context

We identified the ad [in the course](#) of a monitoring project that is seeking to better understand the circumstances in which age-restricted ads appear in online media where more than 25% of the audience is under 18 years of age. We published an [article](#) in March 2024 communicating the purpose of our project.

We are working with a specialist consultancy to help us to identify the key parties involved in the supply pathway of online age-restricted ads found to have breached the Code's targeting restrictions.

With regard to the ad, we have identified the following:

Advertiser	Intermediary 1	Intermediary 2	Intermediary 3	Publishers	Avatar in receipt of ad
Gambling Operator	X	X	X	Kidswebsite.com	Neutral

Whilst the Code places primary responsibility on advertisers to comply with its rules, it also states that others involved in preparing or publishing marketing communications accept an obligation to abide by the Code. We are therefore writing to the companies referenced above to ask them for their perspective on how this ad came to be advertised on a site aimed at an under 18 audience.

We intend to publish in due course a report on the outcomes of our project, which we will share with you prior to its publication.

Action required

- i. Review your systems and processes to ensure age-restricted advertisements are not directed at people under 18 through the selection of media or context in which they appear, including by avoiding media where more than 25% of the target audience is under 18 years of age. We ask you to have regard to [CAP Guidance on Age-restricted ads online](#) and update your procedures as appropriate. Please tell us what actions you have taken to address this.
- ii. Support us to better understand how this ad came to be served on websites aimed at audiences of under 18 years of age.
- iii. Provide us with information about the role your company plays to facilitate the placement of age-restricted ads online.
- iv. Please let us know of any other intermediary service providers not already listed above that played a significant role in the distribution of this ad, whose perspective may be important to our enquiries.

Your response deadline

Please provide us with the above information – and any other information you feel is relevant to our enquiries – by **[7 working days]**. If you have any questions, please feel free to get in touch with me.

Yours sincerely

Advertising Standards Authority

ASA
Legal, decent, honest and truthful

Annex 2: Project methodology

Project objective

The objective of this study was to pursue a new angle to our monitoring work to look at the **supplier pathway of ads** that are in breach of the CAP Code. We sought to monitor for and, as relevant, identify age-restricted ads served to websites and YouTube channels of particular interest to under-18s and, in each case, identify the intermediaries that have facilitated their distribution. We then selected a number of case studies, where the data indicated the ads had not been directed away from an under-18 audience and invited the input of those intermediaries – in addition to that of the advertiser, their agency (as relevant) and the publisher - as to how the breach had occurred.

Methodology

We commissioned cyber safety consultancy, White Bullet, to conduct the monitoring of websites and YouTube channels on our behalf. We worked with them to determine the websites and YouTube channels to monitor based on the following:

- Audience profile: We used data sourced from Comscore¹⁷ MMX (for websites) and Video Metrix (for YouTube channels), for the September 2023 data period, to help establish a list of websites and YouTube channels to monitor as part of this study. Comscore's MMX and Video Metrix data provides online desktop and laptop audience measurement data for individuals aged six or over and reports on the proportion of all visitors to a website or YouTube channel, via a desktop or laptop, that are aged between 6-17¹⁸ years of age.

The Code's targeting rules require that age-restricted ads must not be directed at people under-16/18 through the selection of media or the context in which they appear. No medium should be used for age-restricted ads if more than 25% of its audience is under-16/18, depending on the advertised product. We assessed the profile of the websites and YouTube channels reported by Comscore and chose to take a cautious approach by considering them for monitoring in this project only if the audience profile was 30% or more for people aged 6-17. We also excluded websites and channels with under 20,000 unique users to ensure composition data was based on robust samples.

¹⁷ Comscore uses a hybrid approach to its methodology, combining a metered panel with data from websites, applications and video tags. Panellists provide demographic information about themselves and their household and a piece of software tracks visits on their device(s) to websites and apps. Comscore also collects audience measurement data in relation to smartphone and tablet usage (Comscore MMX Multi-Platform data) but this only reports full data for those aged 18 years and over, partial data for those aged 13 and over, and no data on those aged under 13 years. Because our focus is on those aged up to 18 years of age, we considered this data was not sufficiently relevant for the purposes of our monitoring exercise.

¹⁸ The CAP Code's targeting rules relating to ads for HFSS products, lotteries and some types of gambling ads prohibit the placement of ads in media directed at children (those aged under-16) rather than to young people (those aged 16 and 17). However, the Comscore audience profile data does not correlate exactly with the Code's definitions of children and young people. Our findings therefore may include a small number of ads in these product categories which appeared in media directed at 16- and 17-year-olds, or where the audience profile is marginally below 25% for those aged under-16.

In the absence of industry-standard online audience measurement data which reports on the online behaviours of children across *all* devices, we have used data reported by Comscore, for 6-17-year-olds based on desktop and laptop use. While this data is limited in its nature, we invited identified parties to share data/resources they may have used to inform their targeting decisions and considered it accordingly as part of our reviewing process.

We used data sourced from Comscore for the September 2023 period. Monitoring of identified sites/channels took place between February-April 2024. While there is a gap between the data period and monitoring period, it is reasonable that a study of this nature requires considerable preparation and set-up time. In addition, there is a lag between the end of the data period and availability of Comscore data which will inevitably lead to differences in the data period and monitoring period.

To mitigate against these points, and as detailed in the next point, we reviewed the content of the sites/channels identified to consider their appeal to under-18s.

- Website/YouTube channel content: As well as reviewing the content of the sites identified using Comscore data (above), we identified a number of additional websites based on input from White Bullet and based on research into websites/YouTube channels popular with under-18s. These were reviewed, taking into account their style, presentation and content. We looked for themes and content that were clearly designed to be engaged with by children and young people or highly likely to appeal, disproportionately, to under-18s compared with adults. This included, for example, bright cartoon-style imagery and content, games suitable for or of a skill-level appropriate for children and young people, and editorial content, stories and themes aimed at children and young people.

A list of the websites and YouTube channels we monitored can be found below. Details of White Bullet’s monitoring methodology can be found [here](#).

Domains and YouTube channels monitored

	Audience profile: 6-17-year-olds over 30% (Comscore MMX, Sept 2023)	Content aimed at under-18s
quotev.com	✓	
picrew.me	✓	
online-calculator.com	✓	
neal.fun	✓	

y8.com	✓	
typingtest.com	✓	
theclashify.com	✓	
rolimons.com	✓	✓
photopea.com	✓	
minecraftservers.org	✓	✓
mathway.com	✓	✓
apkpac.com	✓	
sporcle.com	✓	
custom-cursor.com	✓	✓
mathsgenie.co.uk	✓	✓
userstyles.org	✓	
fortnitetracker.com	✓	✓
songsterr.com	✓	
getrevising.co.uk	✓	✓
symbolab.com	✓	✓
calculatorsoup.com	✓	✓
traderie.com	✓	✓
coolmathgames.com	✓	✓
poki.com	✓	✓
billboard.com	✓	
physicsandmathstutor.com	✓	✓
ranker.com	✓	
funology.com		✓
kidstoyyoutube.wordpress.com		✓
kidzshowz.wordpress.com		✓
lil-fingers.com		✓
seventeen.com		✓
spacemonsterskidz.wordpress.com		✓
mariosonicgames.com		✓
comonkids.wordpress.com		✓
freestoriesforkids.com		✓
sciencekids.co.nz		✓
kidstoysgamessite.wordpress.com		✓
mathchimp.com		✓
bestkidswebsites.com		✓
netart.us		✓
fuelthebrain.com		✓
mathplayground.com		✓

skatinggames.org		✓
virtualworldsforteens.com		✓
math.com		✓
primarygames.com		✓
academickids.com		✓
revisionscience.com		✓
igirlgames.com		✓
sesamestreet.org		✓
factmonster.com		✓
nickjr.co.uk		✓
poptropica.com		✓
cartoonnetwork.co.uk		✓

YouTube channels we monitored

Channel	Audience profile: 6-17-year-olds over 30% (Comscore Video Metrix, Sept 2023)	Content aimed at under-18s
KickFlix @ YouTube https://www.youtube.com/@KickFlix	✓	
Smallant1 @ YouTube https://www.youtube.com/@Smallant	✓	✓
PrestonReacts @ YouTube https://www.youtube.com/@PrestonReacts	✓	✓

corbettmaths @ YouTube https://www.youtube.com/@corbettmaths	✓	✓
The GCSE Maths Tutor @ YouTube https://www.youtube.com/@TheGCSEMathsTutor	✓	✓
Anna McNulty @ YouTube https://www.youtube.com/@annamcnulty	✓	✓
AliSpags @ YouTube https://www.youtube.com/alispags	✓	
Ben Azelart @ YouTube https://www.youtube.com/c/BenAzelart	✓	✓
Maddie Dean @ YouTube https://www.youtube.com/channel/UCmYPY1ukN5mNzbweaWhBV_Pw	✓	
Modest Pelican Gaming @ YouTube https://www.youtube.com/@ModestPelican	✓	
JT Casey @ YouTube https://www.youtube.com/@jtcasey	✓	
Haminations @ YouTube https://www.youtube.com/@Haminations	✓	✓
Atarah Mayhew Beauty @ YouTube https://www.youtube.com/c/AtarahMayhew	✓	
Benji Krol @ YouTube https://www.youtube.com/@BenjiKrol	✓	✓
PointCrow @ YouTube	✓	

https://www.youtube.com/pointcrow		
Matt Randon @ YouTube https://www.youtube.com/@MattRandon	✓	
Mr.Beast @ YouTube https://www.youtube.com/channel/UCX6OQ3DkcsbYNE6H8uQQuVA	✓	
Cosmic Kids Yoga https://www.youtube.com/channel/UC5ulZ2KOZZeQDQo_Gsi_qbQ		✓
Ryan's World https://www.youtube.com/channel/UChGJGhZ9SOOhvBB0Y4DOO_w/featured		✓
Pink Fong https://www.youtube.com/@Pinkfong		✓

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