

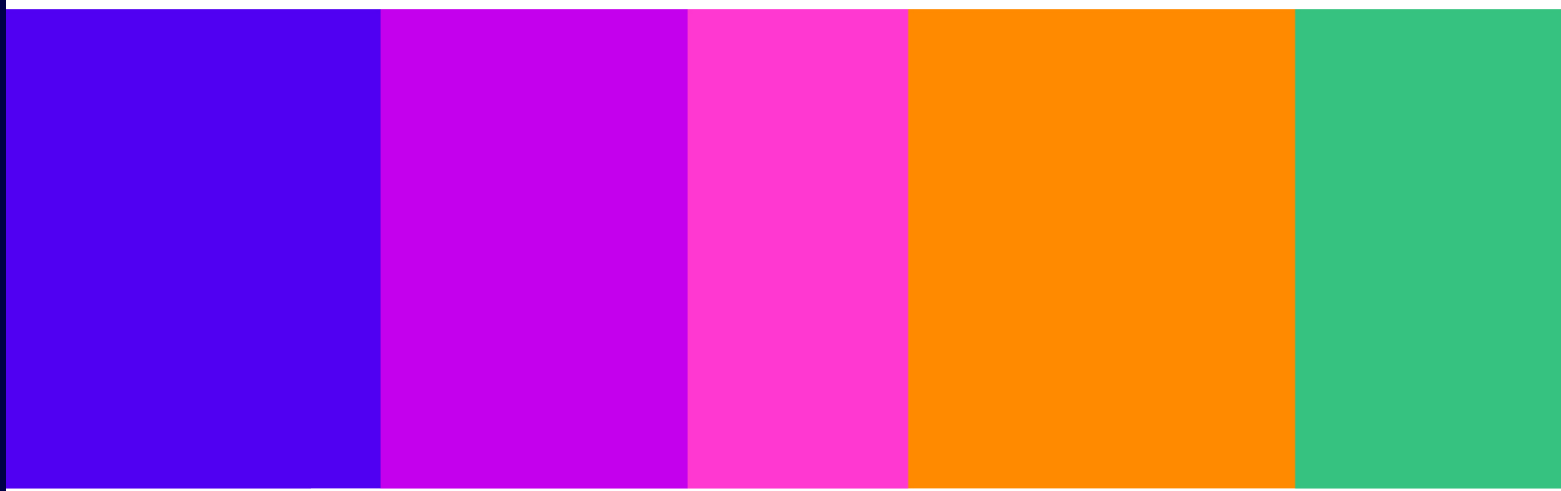
Fraudulent Advertising Codes Consultation

Annex 1: Stakeholder responses annex

Consultation

Published 10 July 2026

Closing date for responses: 02 October 2026



Responding to this consultation

How to respond

- A1.1 Ofcom would like to receive views and comments on the issues raised in this consultation, by 5pm on Friday 2 October 2026.
- A1.2 You can view the online response form [here](#).
- A1.3 Alternatively, you can return this by email or post to the address provided in the response form. If your response is a large file, or has supporting charts, tables or other data, please email it to FraudulentAdvertisingConsultation@ofcom.org.uk as an attachment, together with the cover sheet. This email address is for this consultation only and will not be valid after 2 October 2026.
- A1.4 Responses may be posted to the address below, marked with the title of the consultation:
Ofcom Online Safety Team
Ofcom
Riverside House
2A Southwark Bridge Road
London
SE1 9HA
- A1.5 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:
- send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files; or
 - upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.
- A1.6 We will publish a transcript of any audio or video responses we receive (unless your response is confidential).
- A1.7 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt of a response submitted to us by email.
- A1.8 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.
- A1.9 It would be helpful if your response could include direct answers to the questions asked in the consultation document. The questions are listed in the 'Consultation questions' subsection below. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.
- A1.10 If you want to discuss the issues and questions raised in this consultation, please email to FraudulentAdvertisingConsultation@ofcom.org.uk.

Confidentiality

- A1.11 Consultations are more effective if we publish the responses before the consultation period closes. This can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. In the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is

interested in an issue can see other respondents' views, we usually publish responses on the Ofcom website at regular intervals during and after the consultation period.

- A1.12 If you think your response should be kept confidential, please specify which part(s) this applies to and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.
- A1.13 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it, either by not publishing the response at all, or by only publishing the bits that are not confidential. Sometimes we might think it is important to disclose parts of a response that have been marked as confidential for reasons of transparency, but we will consult you before we do. Occasionally we might have a legal obligation to publish information or disclose it in court, but again, as far as possible, we will let you know.
- A1.14 Even if your response is not marked as confidential, we might still decide not to publish all or part of it in certain circumstances. For example, if we have concerns about the impact on your privacy or the privacy of others, that the content of the response might facilitate the commission of crime, or about the sensitive nature of the content more generally. If we decide not to publish all or part of your response, we will still take it into account in our consideration of the matter.
- A1.15 To fulfil our pre-disclosure duty, we may share a copy of your response with the relevant government department before we publish it on our website.
- A1.16 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further in our Terms of Use.

Next steps

- A1.17 Following this consultation period, Ofcom plans to publish a statement by mid-2027 at the latest.
- A1.18 If you wish, you can register to receive email updates alerting you to new Ofcom publications.

Ofcom's consultation process

- A1.19 Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles below.
- A1.20 If you have any comments or suggestions on how we manage our consultations, please email us at consult@ofcom.org.uk. We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and individual users, who are less likely to give their opinions through a formal consultation.
- A1.21 If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact the corporation secretary:

Corporation Secretary

Ofcom

Riverside House

2a Southwark Bridge Road

London

SE1 9HA

Email: corporationsecretary@ofcom.org.uk

Ofcom's consultation principles

A1.22 Ofcom has seven principles that it follows for every public written consultation:

Before the consultation

A1.23 Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

During the consultation

A1.24 We will be clear about whom we are consulting, why, on what questions and for how long.

A1.25 We will make the consultation document as short and simple as possible, with an overview of no more than two pages. We will try to make it as easy as possible for people to give us a written response.

A1.26 When setting the length of the consultation period, we will consider the nature of our proposals and their potential impact. We will always make clear the closing date for responses. A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.

A1.27 If we are not able to follow any of these seven principles, we will explain why.

After the consultation

A1.28 We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish the responses on our website at regular intervals during and after the consultation period.

A1.29 After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

Consultation coversheet

Basic details

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

Confidentiality

Please tick below what part of your response you consider is confidential, giving your reasons why

- > Nothing
- > Name/contact details/job title
- > Whole response
- > Organisation
- > Part of the response

If you selected 'Part of the response', please specify which parts:

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

Yes No

Declaration

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom aims to publish responses at regular intervals during and after the consultation period. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

Consultation questions

Please tell us how you came across this consultation.

- Email from Ofcom
- Saw it on social media
- Found it on Ofcom's website
- Found it on another website
- Heard about it on TV or radio
- Read about it in a newspaper or magazine
- Heard about it at an event
- Somebody told me or shared it with me
- Other (please specify)

Volume 1: Context

Online advertising ecosystem

- Is there any information or evidence you hold that could enhance our understanding of the online advertising ecosystem?

Causes and impacts of fraudulent advertising

- Do you have any comments on Ofcom's assessment of the causes and impacts of fraudulent advertising? Do you think we have missed anything important in our analysis? Please provide evidence to support your answer.
- Do you agree with the examples of risky characteristics we have provided? Please provide any arguments and supporting evidence.

Approach to Codes

- Do you agree with our proposed approach? Please provide any arguments and supporting evidence.

Combined impact assessment

- Do you consider the overall burden on the service providers in scope of our proposed measures to be proportionate? Please provide any arguments and supporting evidence.

Volume 2: Risk, Governance and Control

Advertising intermediaries

- Do you agree with our proposal? Please provide any arguments and supporting evidence.

- We have included two illustrative examples of when and how this measure may be applied, and what ‘all reasonable endeavours’ might look like. Do you have any comments on these examples, and do you have any additional examples of how providers could work with or require intermediaries to implement safety measures in circumstances where they have insufficient control? Please provide any arguments and supporting evidence.

Fraud indicator assessment

- Do you agree with our proposal? Please provide any arguments and supporting evidence.
- Do you think there are other information sources providers should consider in order to understand how fraudulent advertising manifests on their service? If so, what information and why would they need to consider it?

Governance and accountability

- Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

Testing advertisement generation tools

- Do you agree with our proposal? Please provide any arguments and supporting evidence.

Volume 3: Ensuring account integrity

Account checks and actions

- Do you agree with our proposal? Please provide any arguments and supporting evidence. Where your feedback relates to a specific check we are proposing providers should carry out, please make this clear. These are:
 - a. verification that advertising account holders work for, or on behalf of, the individual or organisation they are advertising;
 - b. checks and actions to prevent banned advertising account holders returning; and
 - c. checks for accounts with indicators that there is a material risk they will post fraudulent advertising so that restrictions can be applied to them.
 - d. repeat checks where there are relevant changes identified on an account.

- Are you aware of any other account checks and actions providers could do to protect users from fraudulent advertising? Please provide any arguments and supporting evidence.

Preventing fraudulent financial services advertising

- Do you agree with our proposal? Please provide any arguments and supporting evidence.

Countering account takeover

- Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.
- Do you have any evidence about account takeover that could inform our assessment, including how frequently it occurs or its impact?

Advertising bans

- Do you agree with our proposal? Please provide any arguments and supporting evidence.
- Are you aware of any additional exceptional circumstances in which it may be proportionate for providers to reverse advertising bans?

Account appeals

- Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

Volume 4: Moderation

Advertising moderation

- Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

Terms of service and publicly available statements

- Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

Advertising complaints

- Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

Ad libraries

- Do you agree with our proposal? Please provide any arguments and supporting evidence.
- Do you agree with the principles, functionalities and information categories which we have included in the proposed measure? Please explain your reasoning and, if possible, provide supporting evidence.
- Do you have any evidence or insights on the process of building an ad library from scratch or adjusting an ad library to align with the proposed measure, and how long that process would take?

Annexes

Equality Impact Assessment and Welsh language assessment

- Do you agree with our Equality Impact Assessment? Please provide any arguments and supporting evidence.
- Do you agree with our Welsh language assessment? Please provide any arguments and supporting evidence.

Guidance on making fraudulent advertising judgements: updates to the Illegal Content Judgements Guidance

- Do you agree with our proposals? Please provide any arguments and supporting evidence.