

# Fraudulent Advertising Codes Consultation

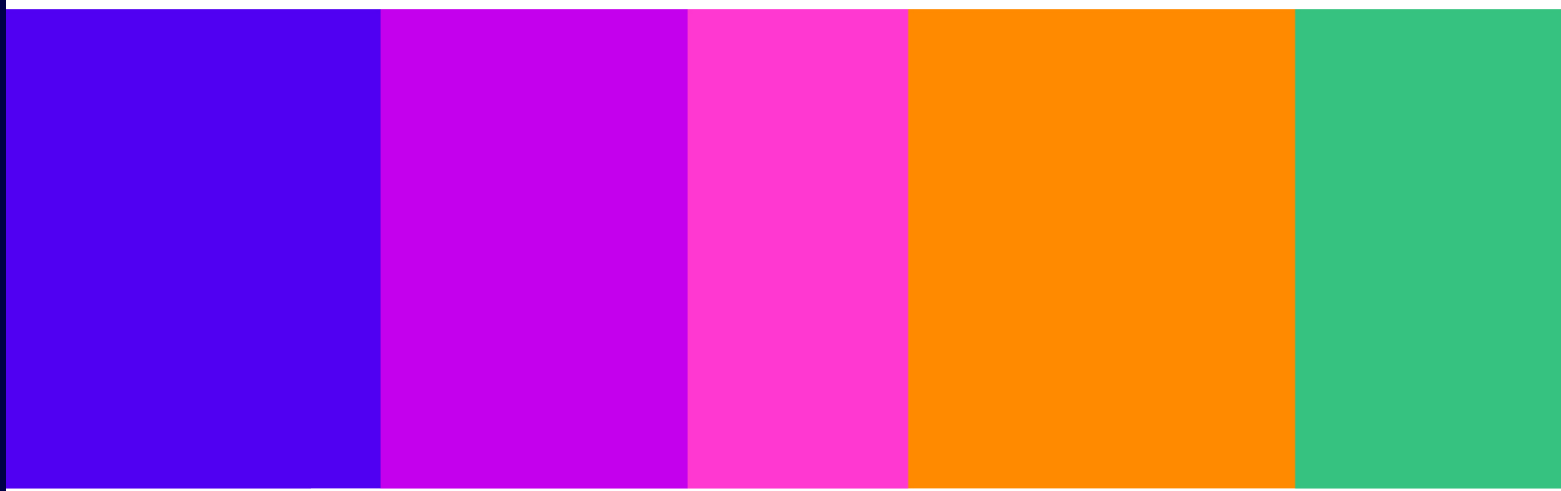
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Annex 7: Glossary

## Consultation

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# A7. Glossary

This glossary sets out definitions of terms used throughout the Consultation. It is intended to help readers understand our proposals. However, in this glossary we have simplified the definitions of some terms used in our proposed codes of practice appearing at Annexes 4 and 5 or in the Online Safety Act 2023. Readers should refer to the proposed codes or to the Act for the more fulsome definitions and the definitions used in the proposed codes or the Act take precedence in the event of inconsistency.

Term	Definition
<b>2023 Illegal Harms Consultation</b>	'Consultation: Protecting people from illegal harms online', published by Ofcom on 9 November 2023, available at <a href="#">Consultation: Protecting people from illegal harms online</a> .
<b>2024 Call for Evidence</b>	'Call for evidence: Third phase of online safety regulation', published by Ofcom on 25 March 2024, available at <a href="#">Call for evidence: Third phase of online safety regulation</a> .
<b>2024 Protection of Children Consultation</b>	'Consultation: Protecting children from harms online', published by Ofcom on 8 May 2024, available at <a href="#">Consultation: Protecting children from harms online</a> .
<b>the Act</b>	The Online Safety Act 2023.
<b>Account appeals</b>	A complaint by an <b>advertising account holder</b> who has attempted to set up, is using, or has previously used, an advertising account in relation to any of the following decisions: <ul style="list-style-type: none"><li>a) failing an account check or where a restriction is placed on the advertising account, in accordance with the provider's account checks and action policy</li><li>b) failing a financial services check or where <b>financial services advertising</b> is not permitted</li><li>c) where a ban has been applied to an incorrect advertising account holder in response to <b>fraudulent advertising</b> or <b>fraudulent advertising proxy</b> being determined.</li></ul> See also ' <b>advertising appeals</b> '

Term	Definition
<b>Account security mechanism</b>	A mechanism, applicable to an advertising account, designed to secure the account from unauthorised access, as set out in FAU H3 and FAS H3.
<b>Ad library</b>	A repository that contains certain data specified in FAU E1 and FAS E1 in relation to <b>paid-for advertisements</b> , including the <b>content</b> of the advertisement and the name of the <b>advertising account</b> that <b>posted</b> the advertisement.
<b>Advertiser(s)</b>	Those who are <b>posting</b> the <b>paid-for advertisement</b> , including <b>advertising account holders</b> and the individual or firm whose products or services are being advertised.
<b>Advertising account</b>	An account which is able to <b>post paid-for advertising</b> on the <b>service</b> .
<b>Advertising account holder</b>	<p>Any persons using an <b>advertising account</b> who are able to <b>post paid-for advertising</b>. This would cover both corporate and manager accounts, as well as individual accounts, including those with different levels of permissions.</p> <p>See Volume 1, Section 3 ‘Online advertising ecosystems’ for a discussion about the different types of persons who may use an <b>advertising account</b>.</p>
<b>Advertising appeals</b>	<p>A complaint by an <b>advertising account holder</b> about any of the following actions, if the action has been taken by the <b>provider</b> on the basis that a <b>paid-for advertisement</b>, posted by the <b>advertising account holder</b> is <b>fraudulent advertising</b> or <b>fraudulent advertising proxy</b>:</p> <ul style="list-style-type: none"> <li>a) the <b>paid-for advertisement</b> being taken down;</li> <li>b) that person becoming a <b>banned person</b>.</li> </ul> <p>See also ‘<b>account appeals</b>’</p>

Term	Definition
<b>Advertising ban</b>	<p>A ban means to prevent an <b>advertising account holder</b> who a <b>provider</b> determines to be responsible for <b>posting a paid-for advertisement(s)</b> that is able to be <b>encountered</b> by United Kingdom <b>users</b> on a <b>Category 1</b> or <b>Category 2A service</b> the <b>provider</b> provides, by taking the following actions:</p> <ul style="list-style-type: none"> <li>a) preventing the <b>advertising account</b> that was used to <b>post the fraudulent advertisement</b> or <b>fraudulent advertising proxy</b> from being able to be used to <b>post paid-for advertisements</b>; and</li> <li>b) taking reasonable steps to prevent the <b>banned person</b> from creating and using new <b>advertising accounts</b> or using existing <b>advertising accounts</b> to <b>post paid-for advertisements</b>.</li> </ul>
<b>Advertising complaints</b>	<p>The following kinds of complaint:</p> <ul style="list-style-type: none"> <li>a) complaints (including <b>advertising reports</b>) by <b>prospective advertising complainants</b> about <b>paid for advertisements</b> present on a <b>service</b> which they consider to be <b>fraudulent advertisements</b>; and</li> <li>b) <b>advertising appeals</b>.</li> </ul>
<b>Advertising contracts</b>	<p>For the purpose of our advertising moderation measures (see FAU C1, FAS C2, FAS C1 and FAS C2), advertising contracts refers to the contracts the <b>provider</b> has in place with other parties regarding the placement of <b>paid-for advertisements</b> on the <b>service</b>.</p> <p>A contractual arrangement may be created in a variety of ways, including through the acceptance of <b>terms of service</b> or equivalent provisions.</p>
<b>Advertising intermediary / Third-party advertising intermediary</b>	<p>An actor within the online <b>advertising supply chain</b> (usually in an open display supply chain) that is involved in the automatic buying, selling and serving of online advertisements, operating between <b>advertisers</b> and <b>providers</b> selling advertising space on a <b>service</b>. A third-party advertising intermediary refers to an intermediary that is separate to the <b>service provider</b>.</p>

Term	Definition
<b>Advertising pathway</b>	<p>An online <b>paid-for advertisement</b> travels through a particular advertising pathway to get from the <b>advertiser</b> (or media agency) to the service it is to be placed on.</p> <p>See also ‘<b>advertising supply chain</b>’</p>
<b>Advertising report</b>	<p>Complaint by a <b>prospective advertising complainant</b> about a <b>paid-for advertisement</b> present on a <b>service</b> which they consider to be a <b>fraudulent advertisement</b>, made using a reporting tool or function provided by the <b>service</b>. This includes complaints made directly from an <b>ad library</b> about <b>paid-for advertisements</b> that can be <b>encountered</b> on the <b>service</b>.</p>
<b>Advertising supply chain</b>	<p>The advertising supply chain consists of the tools, companies, and processes that connect <b>advertisers</b> with audiences, enabling the automated buying, selling, serving, and measurement of ad inventory across digital channels. There are several types of advertising supply chain, including open display supply chain (which typically sits outside of a <b>service</b> the advertisement is to be served on) and owned and operated supply chain (which is generally integrated with the <b>service</b> the advertisement is to be served on).</p>
<b>Affected person</b>	<p>An individual or entity, other than an <b>advertising account holder</b>, who is in the United Kingdom and who, in relation to a <b>relevant paid-for advertisement</b>:</p> <ul style="list-style-type: none"> <li>a) appears or is referred to in the advertisement;</li> <li>b) is a member of a class or group of people with a certain characteristic targeted by the advertisement;</li> <li>c) is a parent of, or other adult with responsibility for, a child who appears in the advertisement; or</li> <li>d) is an adult providing assistance in using the <b>service</b> to another adult who requires such assistance, where that other adult appears in the advertisement.</li> </ul>

Term	Definition
<b>Agent</b>	A business (or individual) that plans, creates and, or in the alternative, manages digital marketing campaigns across online services. An <b>advertiser</b> , such as an individual or company with a product or service to promote, may engage an agent to submit advertisements to relevant online services.
<b>April 2025 Statement on Protecting Children from Harms Online</b>	‘Statement: Protecting children from harms online’, published by Ofcom on 24 April 2025, available at <a href="#">Statement: Protecting children from harms online</a> .
<b>Banned person</b>	A <b>person</b> banned in accordance with Recommendation FAU H5 and FAS H5.
<b>Category 1 service</b>	Regulated <b>user-to-user services</b> operating in the United Kingdom which have met the following threshold conditions: in respect of the user-to-user part of that <b>service</b> , it has an average number of monthly active United Kingdom <b>users</b> that exceeds 34 million and uses a content recommender system, or has an average number of monthly active United Kingdom users that exceeds 7 million, uses a content recommender system, and provides a functionality for users to forward or share regulated <b>user-generated content</b> on the <b>service</b> with other users of that <b>service</b> . <sup>1</sup>

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<sup>1</sup> The Online Safety Act 2023 (Category 1, Category 2A and Category 2B Threshold Conditions) Regulations 2025, Regulation 3.

Term	Definition
<p><b>Category 2A service</b></p>	<p>Regulated search or combined <b>services</b> operating in the United Kingdom which have met the following threshold conditions:</p> <ul style="list-style-type: none"> <li>a) it has an average number of monthly active United Kingdom <b>users</b> that exceeds 7 million and</li> <li>b) is not a search engine which: <ul style="list-style-type: none"> <li>i) only enables a <b>user</b> to search selected websites or databases in relation to a specific topic, theme or genre of <b>search content</b>, and</li> <li>ii) is facilitated by means of an arrangement between the <b>provider</b> of a regulated <b>search service</b> or combined service with one or more entities, which relies on an application programming interface or other technical means to present <b>search results</b> to users.<sup>2</sup></li> </ul> </li> </ul>
<p><b>Codes of practice (Codes)</b></p>	<p>The set of measures recommended for compliance with the <b>fraudulent advertising duties</b> that Ofcom is required to prepare under section 41(4) of the <b>Act</b>. The draft codes on which we are consulting can be found under Annex 4 and 5 of this document (respectively).</p> <p>The term '<b>Fraudulent Advertising Codes</b>' is to be read accordingly.</p>
<p><b>Content</b></p>	<p>Anything communicated by means of an internet service, whether publicly or privately, including written material or messages, oral communications, photographs, videos, visual images, music and data of any description.</p> <p>See section 236(1) of the <b>Act</b>.</p>
<p><b>December 2024 Statement on Protecting People from Illegal Harms Online</b></p>	<p>'Statement: Protecting people from illegal harms online', published by Ofcom on 16 December 2024, available at <a href="#">Statement: Protecting people from illegal harms online</a>.</p>

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<sup>2</sup> The Online Safety Act 2023 (Category 1, Category 2A and Category 2B Threshold Conditions) Regulations 2025, Regulation 4.

Term	Definition
<b>Digital Services Act</b>	Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC.
<b>ECHR</b>	The European Convention on Human Rights (incorporated into domestic law by the Human Rights Act 1998).
<b>Encounter</b>	In relation to <b>content</b> , means read, view, hear or otherwise experience <b>content</b> .  The terms ‘encountered’ and ‘encounterable’ are to be read accordingly.  See section 236(1) of the <b>Act</b> .
<b>Financial services advertising</b>	Any <b>paid-for advertising</b> that promotes, or is capable of promoting, financial products or services. This includes advertising for common types of financial services and products, including, but not limited to, investments, credit and loans, insurance, pensions, debt advice, and qualifying cryptoassets.  The term ‘financial services advertisements’ is to be read accordingly.
<b>Fraudulent advertisement(s)/ Fraudulent advertising</b>	A fraudulent advertisement is a <b>paid-for advertisement</b> that amounts to one or more of the fraud offences specified in section 40 of the <b>Act</b> ( <b>‘the Specified Fraud Offences’</b> ). <b>User-generated content</b> is exempt from the definition of a <b>fraudulent advertisement</b> in relation to <b>Category 1 Services</b> , but not <b>Category 2A Services</b> . See sections 38(3) and 39(3) of the <b>Act</b> in relation to <b>Category 1</b> and <b>2A services</b> , respectively. <sup>3</sup>
<b>Fraudulent advertising duties</b>	The duties set out within sections 38 and 39 of the <b>Act</b> .
<b>Fraudulent advertising judgement</b>	A judgement about whether a <b>paid-for advertisement</b> is a <b>fraudulent advertisement</b> , made in accordance with section 192(2) and section 192(4) to (7) of the <b>Act</b> .

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<sup>3</sup> Please note that a fraudulent advertisement(s)/advertising is a different concept than what is often referred to as “ad fraud”, namely the practice of misrepresenting traffic, clicks, impressions, conversions or other data events to advertisers.

Term	Definition
<b>Fraudulent advertising proxy</b>	<p><b>Paid-for advertisements</b> that a <b>provider</b> determines to be in breach of its <b>terms of service, advertising contracts</b> or a combination of these when read together, where:</p> <ul style="list-style-type: none"> <li>a) The <b>provider</b> has reason to suspect that the advertisement may be a <b>fraudulent advertisement</b>; and</li> <li>b) The <b>provider</b> is satisfied that <b>its terms of service, advertising contracts</b> (where all of the <b>provider’s advertising contracts</b> contain similar prohibitions in relation to <b>fraudulent advertisements</b>) or a combination of these when read together prohibit the type of <b>fraudulent advertisement</b> which it has reason to suspect exists.</li> </ul>
<b>Fraud indicator assessment</b>	An assessment to identify characteristics or groups of characteristics that indicate a material risk of an advertisement being fraudulent or an <b>advertising account</b> be used to post <b>fraudulent advertisements</b> as set out in FAU B1 and FAS B1.
<b>Generative artificial intelligence (GenAI)</b>	A form of artificial intelligence models that can create or alter text, images, audio and videos, typically in response to a user prompt.
<b>ICJG</b>	Illegal Content Judgements Guidance published by Ofcom. See Annexes 9 to 11 for our proposals to amend the ICJG.
<b>Internal advertising policies</b>	More detailed versions of external policies which may set out rules, standards, or guidelines (including around which advertisements are allowed and which are not) as well as providing a framework for how policies should be operationalised and enforced.
<b>June 2025 Additional Safety Measures Consultation</b>	‘Consultation: Online Safety - Additional Safety Measures’, published by Ofcom on 30 June 2025, available at <a href="#">Consultation: Online Safety - Additional Safety Measures</a> .
<b>Online Fraud Charter</b>	A voluntary agreement between the Government and certain <b>providers</b> to take action to reduce fraud signed in 2023.  Available at <a href="#">Online Fraud Charter</a> .

Term	Definition
<p><b>Paid-for advertisement/Paid-for advertising</b></p>	<p>An advertisement is a “paid-for advertisement” in relation to an internet service if—</p> <ul style="list-style-type: none"> <li>a) the <b>provider</b> of the <b>service</b> receives any consideration (monetary or non-monetary) for the advertisement (whether directly from the <b>advertiser</b> or indirectly from another person), and</li> <li>b) the <b>placement</b> of the advertisement is determined by systems or processes that are agreed between the parties entering into the contract relating to the advertisement.</li> </ul> <p>The term ‘paid-for financial services advertising’ is to be read accordingly.</p> <p>See section 236(1) of the <b>Act</b>.</p>
<p><b>Placement of advertisement(s)</b></p>	<p>The placement of advertisements refers to the decision-making process around the placing of <b>paid-for advertisements</b> that can be <b>encountered</b> by United Kingdom users.</p> <p>For <b>paid-for-advertisements</b>, the placement of advertisements is determined by systems and processes that are agreed between the parties entering into the contract relating to the advertising.</p> <p>See section 236(1) of the <b>Act</b>.</p>
<p><b>Post or posting an advertisement(s)</b></p>	<p>An <b>advertising account holder</b>, taking the steps necessary to make <b>paid-for advertising encounterable</b> by United Kingdom <b>users</b>.</p>
<p><b>Proactive technology</b></p>	<p>Consisting of three types of technology: content identification technology, user profiling technology, and behaviour identification technology (subject to certain exceptions) as defined in section 231 of the <b>Act</b>.</p>
<p><b>Prospective advertising complainants</b></p>	<p>The following persons:</p> <ul style="list-style-type: none"> <li>(a) <b>United Kingdom users</b>;</li> <li>(b) persons using an <b>advertising account</b>;</li> <li>(c) users of the <b>ad library</b>; and</li> <li>(d) <b>affected persons</b>.</li> </ul> <p>In relation to <b>Category 2A services</b> only, in addition to those listed above, interested persons (as defined in section 227(7) of the <b>Act</b>).</p>

Term	Definition
<b>Provider of a regulated service or Provider</b>	<p>This is the entity, and that entity alone, who:</p> <ul style="list-style-type: none"> <li>a) For regulated <b>user-to-user services</b>, has control over who can use the user to-user part of the <b>service</b>; or</li> <li>b) For regulated <b>search services</b>, has control over the operations of the search engine; or</li> </ul> <p>Where no such entity exists, the provider will be the individual or individuals with this control.</p> <p>See section 226 of the <b>Act</b>.</p>
<b>Publicly Available Statement</b>	<p>The statement that <b>providers of Category 2A services</b> are required to make available to members of the public in the United Kingdom pursuant to section 39(2) of the <b>Act</b>.</p>
<b>Recommended trusted flagger</b>	<p>The persons that are recommended by Ofcom as trusted flaggers in relation to fraudulent advertising (see FAU D7 and FAS D7).</p>
<b>Search content</b>	<p><b>Content</b> that may be <b>encountered</b> in or via <b>search results</b> of a <b>search service</b>. It does not include <b>paid-for advertisements</b> (and see other exclusions in section 57(2) of the <b>Act</b>).</p>
<b>Search results</b>	<p><b>Content</b> presented to a <b>user</b> of a <b>search service</b> by operation of the search engine in response to a search request made by the <b>user</b>.</p> <p>Where <b>advertisers</b> have paid to ensure that certain search results are presented on the first page of any search result ('sponsored results') this is to be considered <b>paid-for advertising</b>.</p>
<b>Search service</b>	<p>An internet service that is, or includes, a search engine.</p>
<b>Service</b>	<p>A regulated <b>user-to-user</b> or <b>search service</b>, i.e. only the U2U or search part of the service.</p>

Term	Definition
<p><b>Specified fraud offences</b></p>	<p>This refers to the following offences:</p> <ul style="list-style-type: none"> <li>a) An offence under any of the following provisions of the Financial Services and Markets Act 2000— <ul style="list-style-type: none"> <li>i) section 23 (contravention of prohibition on carrying on regulated activity unless authorised or exempt);</li> <li>ii) section 24 (false claims to be authorised or exempt);</li> <li>iii) section 25 (contravention of restrictions on financial promotion).</li> </ul> </li> <li>b) An offence under any of the following provisions of the Fraud Act 2006— <ul style="list-style-type: none"> <li>i) section 2 (fraud by false representation);</li> <li>ii) section 4 (fraud by abuse of position);</li> <li>iii) section 7 (making or supplying articles for use in frauds);</li> <li>iv) section 9 (participating in fraudulent business carried on by sole trader etc).</li> </ul> </li> <li>c) An offence under any of the following provisions of the Financial Services Act 2012— <ul style="list-style-type: none"> <li>i) section 89 (misleading statements);</li> <li>ii) section 90 (misleading impressions).</li> </ul> </li> <li>d) An offence of attempting or conspiring to commit an offence specified in paragraphs (a), (b) or (c).</li> <li>e) An offence under Part 2 of the Serious Crime Act 2007 (encouraging or assisting) in relation to an offence specified in paragraphs (a), (b) or (c) or (in Scotland) inciting a person to commit such an offence.</li> <li>f) An offence of aiding, abetting, counselling or procuring the commission of an offence specified in paragraphs (a), (b) or (c), or (in Scotland) being involved art and part in the commission of such an offence.</li> </ul>
<p><b>Terms of Service</b></p>	<p>In relation to a <b>user-to-user service</b>, all documents comprising the contract for use of the service (or of part of it) by United Kingdom <b>users</b>.</p> <p>See section 236(1) of the <b>Act</b>.</p>

Term	Definition
<b>Trusted flagger</b>	<p>An entity which is a <b>recommended trusted flagger</b> and any other person:</p> <ul style="list-style-type: none"> <li>a) whom the <b>provider</b> has reasonably determined has expertise in <b>fraudulent advertisements</b>; and</li> <li>b) for whom the <b>provider</b> has established a dedicated reporting channel.</li> </ul>
<b>URL (Uniform Resource Locator)</b>	<p>A “uniform resource locator”, which is a reference that specifies the location of a resource accessible by means of the internet.</p>
<b>User</b>	<p><b>The Act</b> does not define ‘user’ but provides that a user of a regulated <b>service</b> does not need to be registered to use that <b>service</b>, however a user cannot be someone acting in the course of the <b>provider’s</b> business, such as:</p> <ul style="list-style-type: none"> <li>a) where the <b>provider</b> of the <b>service</b> is an individual or individuals, that individual or those individuals;</li> <li>b) where the <b>provider</b> is an entity, officers of the entity;</li> <li>c) persons who work for the <b>providers</b> (including as employees or volunteers);</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>d) any other person providing a business service to the <b>provider</b> such as a contractor, consultant or auditor.</li> </ul> <p>See section 227 of the <b>Act</b>.</p>
<b>User-generated content (UGC)</b>	<p>User-generated content in relation to a <b>user-to-user service</b>, means <b>content</b></p> <ul style="list-style-type: none"> <li>a) that is: <ul style="list-style-type: none"> <li>i) generated directly on the <b>service</b> by a <b>user</b> of the <b>service</b>, or</li> <li>ii) uploaded to or shared on the <b>service</b> by a <b>user</b> of the <b>service</b>, and</li> </ul> </li> <li>b) which may be <b>encountered</b> by another <b>user</b>, or other <b>users</b>, of the <b>service</b> by means of the <b>service</b>.</li> </ul> <p>See section 55(3) of the <b>Act</b>.</p> <p>For regulated user-generated content, see section 55(2) of the <b>Act</b>.</p>

Term	Definition
<b>User-to-user service (U2U)</b>	An internet service by means of which content that is generated directly on the <b>service</b> by a <b>user</b> of the <b>service</b> , or uploaded to or shared on the <b>service</b> by a <b>user</b> of the <b>service</b> , may be <b>encountered</b> by another <b>user</b> , or other <b>users</b> , of the <b>service</b> .