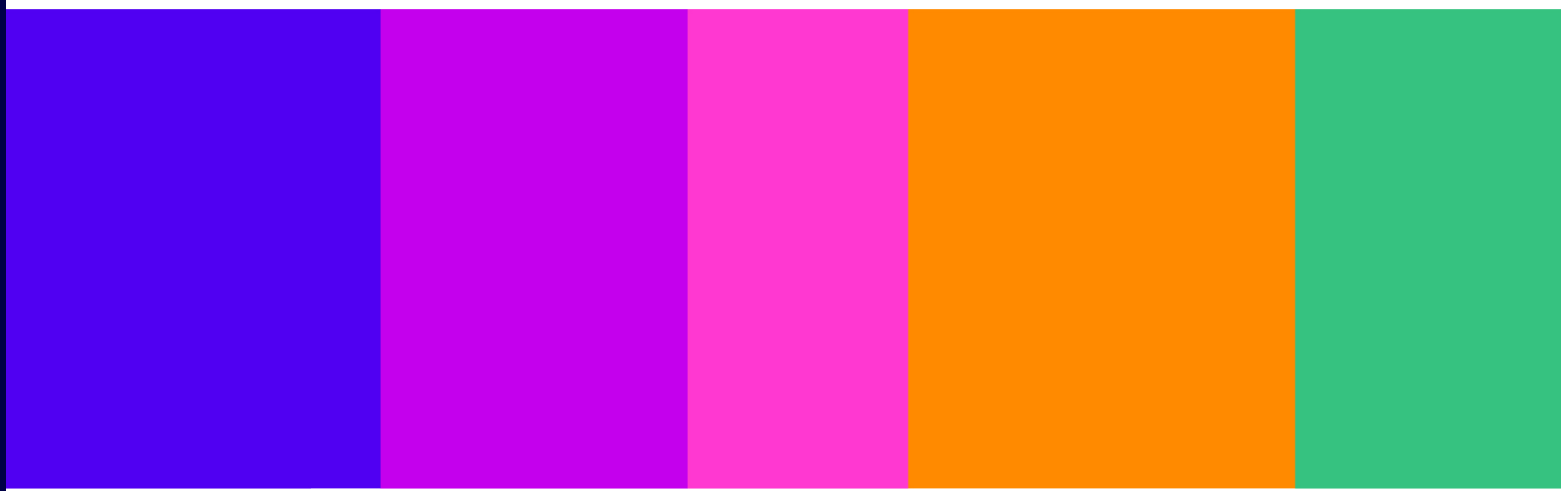


Fraudulent Advertising Codes Consultation

Summary of each section

Consultation

Published 10 July 2026



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Overview

This document sets out a high-level summary of each section of our Fraudulent Advertising Codes Consultation (Consultation) to help stakeholders navigate and engage with our Consultation document. The full detail of our proposals and the underlying rationale are set out in the full document. Nothing in this document should be taken to affect what is set out in the Consultation (in the event of any inconsistency, the Consultation prevails).

We are consulting publicly on the proposals set out in full in this Consultation document. We welcome comments from stakeholders in response to our proposals, including any further evidence and supporting information to inform our final decisions. You can find out more about how to respond in Annex 1, 'Stakeholder responses annex'.

The Consultation closes on 2 October 2026.

Volume 1: Context

Introduction

What is this section of the consultation about?

This section provides a high-level introduction to our Fraudulent Advertising Codes Consultation. It outlines the statutory basis of Ofcom's role, our specific duties in relation to online safety and fraudulent advertising and explains how to navigate this document. To help improve the accessibility of this document we have included suggestions for which parts of our consultation different types of stakeholders might find most useful.

Online advertising ecosystem

What is this section about?

This section presents a generalised understanding of the online advertising ecosystem, and the ways providers can place paid-for advertisements on Category 1 and 2A services.

Online advertising uses data and technology to facilitate personalised advertising. Both search and display advertising use bidding and auction infrastructure: search advertising is traded through a keyword-based auction, while display advertising is placed on services via technological systems and functions known as 'adtech'. The functions involved in these systems form part of the 'advertising supply chain', which we refer to as an 'advertising pathway'. An advertisement will travel through a particular advertising pathway to get from the advertiser (or media agency) to the service it is to be placed on.

Providers can use different types of advertising pathways (either exclusively or in combination) to place advertisements on their service:

- a) They can use a system where the supply chain is 'owned and operated' by or integrated with the service (sometimes described as a 'walled garden').
- b) They can use the open-display market, where advertisements, ad slots and ad impressions are sold and bought using a range of advertising intermediaries.
- c) We also note that providers can engage in 'direct deals' (either within an owned-and-operated supply chain or through the open-display market), where the provider enters into a direct agreement with an advertiser to place advertisements from their business on its service(s).

Advertising pathways or supply chains are complex and dynamic, often varying between services. An owned-and-operated supply chain is a complex **centralised** system. An open-display supply chain is a complex and dynamic **decentralised** system.

The pathway a provider uses to place advertisements on its service – and the level of integration of parts of the supply chain within the service – has an impact on decisions providers make related to the placement of advertisements on a service, and any mitigations against fraudulent advertising.

Consultation question

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

Causes and impacts of fraudulent advertising

What is this section about?

Fraud is the most common crime in the UK, with an estimated 4.4 million incidents taking place in 2025. The Home Office estimated that in 2023 to 2024¹ the total economic and social cost of fraud against individuals was £9.2 billion. Advertising is the second most common way fraudsters reach victims online, and they are increasingly using paid-for advertisements to target users at scale.

The impact of fraudulent advertising can be severe. Victims not only lose money, but often suffer emotional distress, erosion of trust, and lasting effects on their lives. There are also wider societal and business impacts, as proceeds can fund organised crime and the loss of trust in advertisements undermines legitimate businesses. These impacts can damage communities, distort markets and disproportionately affect smaller firms.

Fraudulent advertising is a highly adversarial harm type, with perpetrators continuously adapting and evolving their tactics to evade detection. Perpetrators use any method they can to defraud users, meaning that fraudulent advertising manifests in diverse and complex ways and across a range of advertisement types – including fraudulent investment, retail, and medical advertisements.

Fraudsters exploit new technology such as artificial intelligence (AI), take advantage of social trends, and leverage the credibility of public figures and trusted brands to deceive users. They often operate through large-scale, coordinated networks and deploy tactics such as impersonation and account takeover to evade detection and increase the reach of their campaigns.

These diverse manifestations and adversarial methods give rise to a range of risky characteristics within both advertisement content and advertising accounts. While such characteristics may also appear in legitimate advertising, certain patterns can indicate that a paid-for advertisement is fraudulent. The characteristics we set out include the impersonation of public figures and brands, cloaked landing pages and unusual URLs, the use of generative AI and ‘deepfakes’, and suspicious account behaviours.

Anyone can be a victim of fraudulent advertising; evidence suggests that no one group is the most vulnerable, but rather that individuals may fall victim based on their circumstances, with some users being more likely to be targeted by or fall victim to specific types of fraudulent advertising.

Consultation questions

- 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

The Online Safety Act places additional duties on providers of Category 1 and 2A services under sections 38 and 39 of the Act in relation to fraudulent advertising.

¹ Note that this relates to the year ending March 2024.

Codes of Practice are an important policy tool which Ofcom uses to get providers to take steps to tackle fraudulent advertising. Our proposed measures aim to promote this change in three key ways:

- **stop fraudsters posting fraudulent advertisements in the first place;**
- **improve the speed at which fraudulent advertisements are detected; and**
- **ensure swift action, once detected, to remove fraudulent advertisements.**

This section gives an overview of how we have approached developing our draft Codes. It also addresses how we have approached a number of specific considerations relevant to the fraudulent advertising context.

1. We have taken a layered approach to designing the draft Codes.

We consider there is no single intervention that can ensure UK users are adequately protected from fraudulent advertising. This is due to the scale of fraudulent advertising on in-scope services, and the way fraudsters continually adapt their tactics to evade detection.

We have therefore sought to tackle fraudulent advertising at different layers. We have placed significant emphasis on **account level interventions**, to stop fraudsters advertising from the outset and to address the scale and speed at which fraudulent advertising happens. We have then proposed further measures, in particular on moderation and reporting, to ensure that those fraudulent advertisements that make it through, are **detected and removed**.

2. We have prioritised safety by design when designing the draft Codes.

We consider effective **safety by design**, the practice of embedding protections into service features, systems and governance from the outset, is central to providers' actions to comply with their duties under the Act.

Our package of proposals emphasises how important this is, with our proposed **governance measures** (to ensure sufficient oversight and accountability for efforts to tackle fraudulent advertising risks), **fraud indicator assessment** (so providers understand how harm manifests, the material risks associated with content and accounts, and use these insights to better apply other mitigations), **strengthening account integrity** (to prevent fraudulent actors accessing advertising systems), and the robust **testing of AI advertisement generation tools** (to identify and address vulnerabilities they identify).

3. We have carefully designed measures that are proportionate for the range of service providers in scope.

We have carefully designed our proposed measures, to ensure they are appropriate for in-scope service providers. In doing so, we have considered a range of important factors.

We have considered, for example, both the severity of harm posed by fraudulent advertising and the degree of control providers have over the placement of advertisements. Our understanding of the scale and impact of fraudulent advertising in the UK underpins our approach to designing measures, ensuring that the benefits of proposed measures are appropriately balanced against their potential costs and impacts. We also recognise that while most providers of Category 1 and 2A services are likely to have substantial control over the placement of advertisements, particularly where they operate owned and operated advertising supply chains, there may be more complex scenarios

involving third-party intermediaries where control is reduced. Our proposed advertising intermediaries measure² accounts for this by providing an alternative pathway to compliance.

Fraudulent advertising is a particularly adversarial space, and technology and best practice evolve at pace. As such, we have taken a balanced approach to measure design, setting enough detail for providers to be clear on the actions they need to take, and adding enough flexibility where it is needed to help ensure that our proposals are sufficiently future proofed.

We will continue our iterative approach to designing Codes we have set out in previous consultations and statements. This means proposing a package of measures we consider will give us a strong foundation on which to build over time.

Consultation question

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

Combined impact assessment

What is this section about?

We have assessed the individual impact of each of the proposed measures in Volumes 2 to 4. As set out there, we consider each of the proposed measures to be effective and significantly beneficial in their own right.

Here we have considered the cumulative impact of our proposals. We consider that this proposed package of measures would be effective in combatting fraudulent advertising. Collectively, we consider the proposed package would have even more significant benefits as the proposed measures are mutually reinforcing, interlocking and not duplicative.

Though the costs of the proposed measures could be significant for some providers, we consider it to be proportionate to the scale of harm fraudulent advertising causes. On balance, our provisional view is that the package of proposed measures set out in this consultation would be proportionate. This conclusion is further supported by the fact that there are a number of factors which would likely mean that in practice the costs of the proposed measures would likely tend to be lower than the headline estimates set out in this document.

Consultation question

- 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.

² See Volume 2, Section 2, 'Advertising intermediaries'.

Volume 2: Risk, governance and control

Advertising intermediaries

What is this section about?

Where providers use advertising intermediaries to place paid-for advertisements on their service, the degree of control providers have over decisions around the placement of advertisements and the application of safety measures may vary. In some circumstances, providers that use advertising intermediaries in an open-display supply chain may have insufficient control to apply a proposed measure.

This section explains our proposed measure for how providers can apply safety measures and comply with their fraudulent advertising duties in circumstances where advertising intermediaries play a role in the placement of paid-for advertisements.

Our proposal

Number in our Codes	Proposed measure <i>Applicable to providers of Category 1 and 2A services that have insufficient control in relation to the placement of paid-for advertisements on their service to apply a measure in the draft Fraudulent Advertising Codes</i>
FAU K1 and FAS K1	Where a provider cannot implement a measure recommended in the draft Fraudulent Advertising Codes, in whole or in part, due to the degree of control it has in relation to the placement of paid-for advertisements on the categorised service, that provider should use all reasonable endeavours to implement a version of the measure(s) , or the relevant part of it, that is as similar to the measure as possible.

Why are we proposing this?

Our expectations for safety mitigations against fraudulent advertising for providers of Category 1 and 2A services are high. The pathway a provider uses to place paid-for advertisements on its service(s) may affect the degree of control the provider has over the placement of paid-for advertisements and the application of safety measures. We are aware that providers might use multiple pathways to place paid-for advertisements on a single service. However, the pathway(s) that a provider uses to place paid-for advertisements on a service should not result in different safety outcomes; providers need to take steps to protect users from fraudulent advertisements.

Consultation questions

- 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

What is this section about?

Fraudulent advertising is a diverse and adversarial harm. Ensuring safety measures are effective and tailored to address fraudster tactics requires a sophisticated understanding of what these tactics are and how they are evolving.

In this section we set out our proposed measure on how service providers should assess relevant evidence to understand how fraudulent advertising manifests, or is likely to manifest, on their service. This assessment should be used to more effectively and proportionately apply mitigations aimed at tackling fraudulent advertising.

Our proposal

Number in our Codes	Proposed measure applicable to providers of Category 1 and 2A services
FAU B1 and FAS B1	The provider should carry out a fraud indicator assessment to identify characteristics that indicate , either alone or in combination, a material risk of fraudulent advertising . The provider should review and update its assessment at least every 12 months or whenever the provider makes a significant change in relation to paid-for advertisements. The provider should track characteristics and groups of characteristics for the purpose of identifying any new potential fraud indicators and then assess, as soon as practicable, whether they indicate a material risk of fraudulent advertising.

Why are we proposing this?

The fraud indicator assessment will help service providers establish what indicators suggest there is a material risk that a paid-for advertisement on their service is fraudulent. Similarly, it will help service providers establish which indicators suggest there is a material risk of an advertising account posting fraudulent advertisements.

Service providers that have undertaken a fraud indicator assessment will therefore be better able to identify advertisements and advertising accounts that pose a material risk, and subject them to additional scrutiny. It will enable them to more effectively and proportionately apply a number of other proposed measures to address fraudulent advertising, and comply with their duties under the Act.

By extension, they will detect and remove more fraudulent advertisements than they would have done without undertaking this assessment. Given the scale and impact of fraudulent advertising, we consider the benefits of this proposed measure are likely to be significant.

Consultation questions

- 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

What is this section about?

Strong governance arrangements, including clear leadership, effective oversight and accountability structures, help ensure that legal and regulatory obligations are understood, appropriately prioritised and consistently met across an organisation.

In this section, we set out our proposed governance measures, and why we are proposing to recommend them.

Our proposals

Number in our Codes	Proposed measure applicable to providers of Category 1 and 2A services
FAU A1 and FAS A1	The most senior governance body in relation to the service should carry out and record an annual review of the measures the provider has taken to comply with the fraudulent advertising duties.
FAU A2 and FAS A2	The provider should name an individual accountable to the most senior governance body for compliance with the fraudulent advertising duties.
FAU A3 and FAS A3	The provider should have written statements of responsibilities for senior managers who make decisions relating to compliance with the fraudulent advertising duties.
FAU A4 and FAS A4	The provider should have an internal monitoring and assurance function to provide independent assurance that measures taken to comply with the fraudulent advertising duties are effective on an ongoing basis.
FAU A5 and FAS A5	Have a code of conduct that sets out the standards and expectations for individuals working for the provider around preventing individuals from encountering fraudulent advertising.
FAU A6 and FAS A6	The provider should secure that that individuals working for the provider who are involved in the paid-for advertising function of the service are trained in the service's approach to compliance with the fraudulent advertising duties sufficiently to give effect to them.

Why are we proposing this?

Robust governance arrangements are likely to enable providers to more effectively implement and manage the systems and processes that protect users from fraudulent advertising on their service. Our proposed measures reflect established practice in sectors with mature governance frameworks and clear senior accountability. We expect service providers to embed principles such as accountability, effective oversight, independence, and clear standards of conduct supported by appropriate compliance training for employees. These proposed measures should support effective decision-making and ensure clear responsibility for preventing and responding to fraudulent advertising, leading to a reduction in the amount of fraudulent advertising that can be encountered by UK users on the service.

Consultation question

- 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

What is this section about?

Service providers increasingly offer advertising account holders artificial intelligence (AI) tools (advertisement generation tools) that can create text, image, audio and video advertisements. Where advertisement generation tools have vulnerabilities or lack effective safeguards, they can be exploited by bad actors to create fraudulent advertisements.

In this section, we set out our proposed measure for testing advertisement generation tools (testing measure) and why we are proposing to recommend it.

Our proposal

Number in our Codes	Proposed measure applicable to providers of Category 1 and 2A services where a provider makes an advertisement generation tool available to advertising account holders (regardless of whether the tool is made available on or off the service).
FAU F1 and FAS F1	The provider should ensure that an advertisement generation tool is tested to identify whether and, if so, how the tool could be used to create fraudulent advertisements or fraudulent advertising proxy.

Why are we proposing this?

Our proposed measure should ensure service providers adopt effective testing of their advertisement generation tools which will help them identify key risks of these tools being used to produce fraudulent advertisements. This would enable them to better mitigate these risks, preventing users from encountering this harmful content.

Consultation question

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

Volume 3: Ensuring account integrity

Account checks and actions

What is this section about?

Checks on advertising accounts help service providers understand whether there are risks they are operated by bad actors. Providers can then take action against these accounts. This should enhance the preventative steps providers take to protect users from encountering fraudulent advertising.

In this section we set out our proposed measure about account checks and actions, and why we are proposing to recommend them.

Our proposal

Number in our Codes	Proposed measure applicable to providers of Category 1 and 2A services
FAU H1 and FAS H1	Providers should have and consistently apply an account checks and actions policy . It should set out how they: verify account holders work for, or on behalf of, the individual or organisation they advertise; carry out checks to prevent banned advertising account holders returning; and find accounts with risks they will post fraudulent advertising to apply restrictions to them. Providers should publish a summary of this policy and review and update their policy at least every 12 months.

Why are we proposing this?

We provisionally consider that robust account checks and taking effective account-level action are essential to prevent users encountering fraudulent advertising, in accordance with providers' duties under the Act.

We are proposing specific checks that we think can be particularly effective to prevent impersonation fraud and prevent banned advertising account holders returning. We are also proposing checks and restrictions that service providers should apply to advertising accounts to assess and mitigate risks. Additionally, we consider that checks should take place to verify if accounts advertising financial services can lawfully do so (these proposals are described separately in Volume 3, Section 3, 'Preventing fraudulent financial services advertising'). This package of steps is designed to make it harder for fraudsters to access service providers' advertising platforms in the first place.

Consultation questions

- 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

What is this section about?

This section sets out the steps we propose service providers should take to ensure that individuals and firms can only advertise financial services products where they have the relevant legal permissions to do so.

It sets out our proposed measure on financial services verification for service providers, and why we are recommending it.

Our proposal

Number in our Codes	Proposed measure applicable to providers of Category 1 and 2A services
FAU H2 and FAS H2	<p>Providers should have and consistently apply a financial services verification policy. It should set out: the types of financial services advertising allowed as well as prohibited on the service; how the provider will find financial services advertisements and those posting them; and how the provider will verify that individuals and firms posting financial services advertising have the appropriate legal permissions before advertisements are able to be encountered by UK users. Providers should also publish a summary of this policy and review and update their policy at least every 12 months.</p>

Why are we proposing this?

Fraudulent financial services advertising causes significant harm. In the UK, financial services advertising targeting UK consumers can only be issued or approved by individuals or firms authorised by the Financial Conduct Authority, unless an exemption applies. We are proposing that service providers check that any individual or firm wishing to advertise financial products and services is legally permitted to do so. The available evidence suggests that this will significantly reduce the amount of fraudulent advertisements for financial services products that users are exposed to.

Consultation question

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

Countering account takeover

What is this section about?

Countering account takeover involves preventing bad actors from gaining access to legitimate advertisers' existing advertising accounts and using the accounts to post fraudulent advertisements. It also involves providing a way for legitimate account holders to report when one of their accounts has been taken over by a bad actor.

In this section, we set out our proposed measures for countering account takeover, and why we are proposing to recommend them.

Our proposals

Number in our Codes	Proposed measure applicable to providers of Category 1 and 2A services
FAU H3 and FAS H3	Providers should implement an account security mechanism on all advertising accounts.
FAU H4 and FAS H4	Providers should make available an account takeover reporting mechanism that is easy to find, easy to access and easy to use . This includes considering the accessibility of the reporting mechanism.

Why are we proposing this?

One technique fraudsters use is taking over legitimate advertising accounts and using them to post fraudulent advertisements. Fraudsters will be less able to do this where service providers have an effective security mechanism. Similarly, where account takeover does occur, having a reporting mechanism helps ensure providers are informed and can act swiftly to prevent further dissemination of fraudulent advertisements. As a result, we consider that having these systems and processes in place will be effective at assisting providers to comply with their duties under the Act to protect individuals in the UK from fraudulent advertising.

Consultation questions

- 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

What is this section about?

Advertising bans involve preventing advertising account holders that are found to have posted fraudulent advertisements from posting paid-for advertisements to UK users on the service, and taking reasonable steps to prevent banned advertising account holders from returning to the service.

In this section we set out our proposed measure for advertising bans, and why we are proposing to recommend it.

Our proposal

Number in our Codes	Proposed measure applicable to providers of Category 1 and 2A services
FAU H5 and FAS H5	Providers should ban advertising account holders that post fraudulent advertisements or fraudulent advertising proxy, and take reasonable steps to prevent them from returning to the service .

Why are we proposing this?

Our proposed measure should ensure that the advertising account holders responsible for posting fraudulent advertisements are no longer able to post paid-for advertisements to UK users. This should have the benefit of reducing overall levels of fraudulent advertising, and assist providers to comply with their duties under the Act.

Consultation questions

- 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

What is this section about?

Account appeals systems and processes provide a means for advertising account holders to challenge decisions taken by Category 1 and 2A providers about the account or an account-level restriction. These proposed measures are intended to ensure that advertising account holders can seek a review of decisions affecting their account and provide relevant information where they believe action has been taken in error or without sufficient context.

In this section, we set out our proposed measures for account appeals and why we are proposing to recommend them.

Our proposals

Number in our Codes	Proposed measure applicable to providers of Category 1 and 2A services
FAU J1 and FAS J1	Providers should have account appeals systems and processes which enable advertising account holders to make account appeals in a way which will secure that the provider will take appropriate action in relation to them.
FAU J2 and FAS J2	The systems and processes should be operated to ensure that the processes for making account appeals are easy to find, easy to access and easy to use while considering the likely accessibility needs of advertising account holders.
FAU J3 and FAS J3	The provider should determine account appeals promptly.
FAU J4 and FAS J4	Where the provider upholds an account appeal , the provider should, as far as possible reverse the action taken as a result of that decision with the purpose of restoring the complainant or the position of the relevant paid-for advertisement (or both) to what it would have been had the decision not been made.

Why are we proposing this?

Effective account appeals systems and processes are essential to enable advertising account holders to promptly inform providers of potential errors in decision making. This will ensure decisions can be reviewed, and where appropriate, reversed in a timely and proportionate manner. We set out the detailed rationale for why we consider our proposed measures are an effective approach to enabling account appeals and addressing disputes arising from account-level restrictions and other account integrity Code measures.

Consultation question

- 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

What is this section about?

Advertising moderation is the process by which service providers review a paid-for advertisement, and where relevant, take appropriate moderation action in relation to it. Service providers use advertising moderation to enforce their rules on which types of paid-for advertisements are permitted on their service. Advertising moderation can be carried out by humans, via automated technology or using a combination of the two.

In this section we set out our proposed advertising moderation measures and why we are proposing to recommend them.

Our proposals

Number in our Codes	Proposed measure applicable to providers of Category 1 services
FAU C1	Providers should have systems and processes designed to review and assess paid-for advertisements the provider has reason to suspect may be fraudulent.
FAU C2	Providers should have systems and processes designed to swiftly take down fraudulent advertisements (or fraudulent advertising proxy) which may be encountered by means of the service and of which they are aware.
FAU C3	Providers should set and record internal advertising policies .
FAU C4	Providers should set and record performance targets for their advertising moderation function.
FAU C5	Providers should prepare and apply a policy in respect of the prioritisation of suspected fraudulent advertisements for review .
FAU C6	Providers should resource their advertising moderation function , to give effect to measures FAU C3 and FAU C4.
FAU C7	Providers should ensure individuals working in advertising moderation receive training and materials that enable them to fulfil their role in moderating paid-for advertisements, including in relation to measures FAU C1, FAU C2 and FAU C3.
Number in our Codes	Proposed measure applicable to providers of Category 2A services
FAS C1	Providers should have systems and processes designed to review and assess advertisements the provider has reason to suspect may be fraudulent.
FAS C2	Providers should have systems and processes designed to swiftly ensure that individuals are no longer able to encounter fraudulent advertisements (or fraudulent advertising proxy) in or via search results of the service and of which they are aware.
FAS C3	Providers should set and record internal advertising policies .
FAS C4	Providers should set and record performance targets for their advertising moderation function.

FAS C5	Providers should prepare and apply a policy in respect of the prioritisation of suspected fraudulent advertisements for review .
FAS C6	Providers should resource their advertising moderation function , to give effect to measures FAS C3 and FAS C4.
FAS C7	Providers should ensure individuals working in advertising moderation receive training and materials that enable them to fulfil their role in moderating paid-for advertisements, including in relation to measures FAS C1, FAS C2 and FAS C3.

Why are we proposing this?

We provisionally consider that having an effective advertising moderation function is essential for service providers to be able to identify and take swift action in response to fraudulent advertisements on their service, and therefore, comply with their duties under the Act to protect individuals in the UK from such content. We set out under each measure the detailed rationale for why we provisionally consider our proposed measures together make up effective advertising moderation systems and processes.

Consultation question

- 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

What is this section about?

Terms of service and publicly available statements typically lay out the rights and responsibilities that a service provider and the users of their service have towards one another.

In this section, we set out our proposed terms of services measures, and why we are proposing to recommend them.

Our proposals

Number in our Codes	Proposed measure applicable to providers of Category 1 and 2A services
FAU G1 and FAS G1	Providers should ensure that their terms and statements include provisions giving information about any proactive technology used by the service for the purpose of compliance with the fraudulent advertising duties (including the kind of technology, when it is used and how it works), as mandated by the Act.
FAU G2 and FAS G2	Providers should ensure that the relevant provisions (the provisions included in terms and statements in accordance with proposed measure FAU G1/FAS G1) are clear and accessible .

Why are we proposing this?

As set out in the Act, service providers must include clear and accessible provisions in their terms of service or publicly available statements giving information about any proactive technology used by the service for the purpose of compliance with the fraudulent advertising duties (including the kind of technology, when it is used and how it works).

The proposed measures set out in this section are intended to secure compliance with the duties in the Act relating to the substance and clarity and accessibility of the relevant provisions.

Consultation question

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

Advertising complaints

What is this section about?

Advertising complaints systems and processes refer to both the mechanisms that enable the submission of advertising complaints and the internal workflows that handle those advertising complaints. A dedicated reporting channel is a specialised reporting route used by organisations acting as trusted flaggers, who have expertise in identifying fraudulent advertisements.

In this section, we set out our proposed measures on advertising complaints and dedicated reporting channels and why we are proposing to recommend them.

Our proposals

Number in our Codes	Proposed measure applicable to providers of Category 1 and 2A services
FAU D1 and FAS D1	Service providers should operate systems and processes which enable prospective advertising complainants to make advertising complaints , in a way which will secure that service providers will take appropriate action in relation to them.
FAU D2 and FAS D2	Service providers should design and operate advertising complaints systems and processes which are easy to find, easy to access and easy to use . This includes considering the accessibility of these systems and processes.
FAU D3 and FAS D3	When service providers receive a complaint about a paid-for advertisement which may be fraudulent, they should treat the complaint as a reason to suspect it may be a fraudulent advertisement, unless it is deemed manifestly unfounded . They should then use their advertising moderation systems and processes to review the advertising complaint.
FAU D4 and FAS D4	Service providers should determine an advertising appeal promptly .
FAU D5 and FAS D5	Where an advertising appeal is upheld and service providers reverse a decision that a paid-for advertisement was a fraudulent advertisement or fraudulent advertising proxy , the service providers should take the following actions (so far as appropriate and possible where relevant): reverse the action taken against the advertising account holder and paid-for advertisement, adjust any relevant internal advertising policies if appropriate to ensure accuracy, and take steps to ensure that the use of automated advertising moderation technology does not cause the same paid-for advertisement to be taken down³ again .

³ In respect of Category 1 services, “taken down” has the same meaning as “taking down” in s236(1) of the Act. In respect of Category 2A services, this is any action which results in UK users no longer being able to encounter paid-for advertisements in or via search results of the service.

FAU D6 and FAS D6	Service providers may only disregard an advertising complaint that is not an advertising appeal if they have a policy that sets out the information and attributes that indicate a manifestly unfounded advertising complaint . Service providers must make decisions in accordance with this policy and review the application of the policy annually.
FAU D7 and FAS D7	Service providers should establish and maintain a dedicated reporting channel for, at a minimum, the recommended trusted flaggers and relating to fraudulent advertising.

Why are we proposing this?

Complaints about paid-for advertisements are an important way for service providers to become aware of fraudulent advertisements that may have evaded other safety mechanisms, and to take action to protect users from them in accordance with their fraudulent advertising duties under the Act.

The availability of advertising appeals systems and processes acts as an important safeguard for freedom of expression and privacy rights, by providing a means to correct erroneous moderation judgements against legitimate paid-for advertisements and advertising account holders.

Dedicated reporting channels make it easier for expert organisations to submit complaints about paid-for advertisements to service providers to help improve the detection of fraudulent advertisements so that they can be taken down.

Consultation question

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

Ad libraries

What is this section about?

Ad libraries are public, digital repositories of paid-for advertisements displayed on a service. They typically include important information such as the content of an advertisement and the advertising account name as well as functionalities to allow users to interrogate it.

In this section, we set out a proposed measure on ad libraries and why we are proposing to recommend it.

Our proposal

Number in our Codes	Proposed measure applicable to providers of Category 1 and 2A services
FAU E1 and FAS E1	<p>Providers that display paid-for advertisements which are capable of being encountered by UK users on their service should set up and make publicly available an ad library containing all such advertisements while they are live on the service, and for a year after they were last live.</p> <p>The ad library should be publicly available, accurate and updated at least daily, and function reliably and consistently.</p>

It should have **robust search functionality** allowing **multi-criteria queries** including, at a minimum, search by keyword, search by exact phrase and search for specific advertising accounts. It should also have an **API**.

The ad library should contain the following information:

- advertising account name;
- advertiser name;
- the content of the advertisement, including advertising images or video, advertising text, and advertising links;
- target audience by demographic;
- target reach, or actual reach if service providers do not have access to the target reach;
- content keywords used to target users making searches;
- previous advertising account names; and
- advertisement status.

The provider should regularly consult with experts and take into account any recommendations from those experts to improve and update the ad library.

Why are we proposing this?

The proposed measure is designed to support experts in swiftly detecting and reporting suspected fraudulent advertising that is capable of being encountered by UK users. This, in turn, supports the objectives of the duty to prevent users from encountering fraudulent advertising and minimise the length of time any such content is present on a service.

In this section, we explain why we consider ad libraries to be a crucial part of a package of measures designed to tackle fraudulent advertising. We detail the minimum principles, functionalities and information categories we provisionally consider an ad library should include, explaining why we consider each proposed characteristic to be necessary for service providers to comply with their duties under the Act.

Consultation questions

- 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?