

Consultation at a glance: our proposals and who they apply to

- 1.1 This document summarises the proposals we are making in our Fraudulent Advertising Consultation (the Consultation) and outlines which services they relate to. It sets out:
 - The measures we are proposing to recommend for Category 1 services;
 - The measures we are proposing to recommend for Category 2A services.
- 1.2 The names of Category 1 and Category 2A services are set out in [Ofcom's 2026 register of categorised services](#). Full definitions (including relevant exemptions) are set out in the Online Safety Act (the "Act").
- 1.3 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).

Measures applied to Category 1 and Category 2A services

- 1.4 Table 1 below sets out the measures we are proposing to recommend for providers of Category 1 services and Category 2A services.¹ Each of the rows in the tables represents a different proposed measure. The proposed measures are in the same order as they appear in the draft Codes themselves.
- 1.5 The different columns show how the proposed measure applies in relation to Category 1 and Category 2A services, and whether the proposed intermediaries measure applies to each proposed measure. Any additional scope considerations are also highlighted.
- 1.6 For completeness, we also note:
 - If a measure is proposed to be recommended for all the providers in a given group of services, this is highlighted in amber (and includes the word 'Applies').
 - If a measure is not proposed to be recommended for any of the providers in a given group of services, this is left blank.
 - We are not proposing to recommend any measures for only some of the providers in a given group.

Table 1: Proposed measures for Category 1 and Category 2A services

Measure number	Name of the measure	Category 1 services	Category 2A services	Does the proposed intermediaries measure ² apply?
Governance and accountability				

¹ These measures only apply to Category 1 services on which UK users can encounter paid-for advertisements that are not regulated user-generated content in relation to the service, and/or Category 2A services on which UK users can encounter paid-for advertisements in or via search results of the service.

² 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

Measure number	Name of the measure	Category 1 services	Category 2A services	Does the proposed intermediaries measure ² apply?
A1	Annual review of compliance activities	Applies	Applies	
A2	Individual accountable for fraudulent advertising	Applies	Applies	
A3	Written statements of responsibilities	Applies	Applies	
A4	Internal monitoring and assurance	Applies	Applies	
A5	Code of conduct regarding preventing individuals from encountering fraudulent advertising	Applies	Applies	
A6	Compliance training	Applies	Applies	
Fraud Indicator Assessment				
B1	Carrying out a fraud indicator assessment	Applies	Applies	Applies
Advertising moderation				
C1	Having an advertising moderation function to review and assess suspected fraudulent advertisements	Applies	Applies	Applies
C2	Having an advertising moderation function that allows for the swift take down of fraudulent advertisements	Applies	Applies	Applies
C3	Setting internal advertising policies	Applies	Applies	Applies
C4	Performance targets	Applies	Applies	Applies
C5	Prioritisation	Applies	Applies	Applies
C6	Resourcing	Applies	Applies	Applies
C7	Provision of training and materials to individuals working in advertising moderation	Applies	Applies	Applies
Reporting and complaints				

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.

Measure number	Name of the measure	Category 1 services	Category 2A services	Does the proposed intermediaries measure ² apply?
D1	Enabling complaints	Applies	Applies	Applies
D2	Having easy to find, easy to access and easy to use advertising complaints systems and processes	Applies	Applies	Applies
D3	Appropriate action for advertising complaints about suspected fraudulent advertising	Applies	Applies	Applies
D4	Appropriate action for advertising complaints which are advertising appeals – determination	Applies	Applies	Applies
D5	Appropriate action for advertising complaints which are advertising appeals – action following determination	Applies	Applies	Applies
D6	Exception: manifestly unfounded advertising complaints	Applies	Applies	Applies
D7	Dedicated reporting channel for trusted flaggers to report suspected fraudulent advertisements	Applies	Applies	Applies
Advertising Libraries				
E1	Advertising Libraries	Applies	Applies	Applies
Testing				
F1	Testing advertisement generation tools	Applies (where the service has an advertisement generation tool)	Applies (where the service has an advertisement generation tool)	
Terms of Service				
G1	Terms of service: substance	Applies	Applies	
G2	Terms of service: clarity and accessibility	Applies	Applies	
Account Integrity				
H1	Account checks	Applies	Applies	Applies

Measure number	Name of the measure	Category 1 services	Category 2A services	Does the proposed intermediaries measure ² apply?
H2	Financial services verification	Applies	Applies	Applies
H3	Account security	Applies	Applies	Applies
H4	Account takeover and reporting	Applies	Applies	Applies
H5	Advertiser Bans	Applies	Applies	Applies
Account Appeals				
J1	Enabling account appeals	Applies	Applies	Applies
J2	Having easy to find, easy to access and easy to use account appeals systems and processes	Applies	Applies	Applies
J3	Appropriate action – determination	Applies	Applies	Applies
J4	Appropriate action – action following determination	Applies	Applies	Applies