Consultation response

Field	Value
Responder	Association of Digital Verification Professionals
Responder Type	organisation
Org Role	Liaison Officer
Org Type	Other
Other Type	Trade association
Where Did You Find Us Other	Industry and government communications monitoring

Volume 1: Context

3. Online advertising ecosystem

Q1: Is there any information or evidence you hold that could enhance our understanding of the online advertising ecosystem?

No response

4. Causes and impacts of fraudulent advertising

Q2: 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.

No response

Q3: Do you agree with the examples of risky characteristics we have provided? Please provide any arguments and supporting evidence.

No response

5. Our approach to developing Codes measures

Q4: Do you agree with our proposed approach? Please provide any arguments and supporting evidence.

No response

6. Combined impact assessment

Q5: 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.

No response

Volume 2: Risk, governance and control

2. Advertising intermediaries

Q6: Do you agree with our proposal? Please provide any arguments and supporting evidence.

No response

Q7: 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.

No response

3. Fraud indicator assessment

Q8: Do you agree with our proposal? Please provide any arguments and supporting evidence.

No response

Q9: 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?

No response

4. Governance and accountability

Q10: Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

No response

5. Testing advertisement generation tools

Q11: Do you agree with our proposal? Please provide any arguments and supporting evidence.

No response

Volume 3: Ensuring account integrity

2. Account checks and actions

Q12: 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 :

The Association of Digital Verification Professionals (ADVP) welcomes the proposed Fraudulent Advertising Codes of Practice. We support Ofcom's layered approach: preventing misuse of advertising accounts, assessing suspicious advertisements, securing legitimate accounts, and providing effective reporting, removal and appeals.

Our principal recommendation concerns the proposed account checks in Volume 3, particularly measure H1. The requirement to verify that an advertising account holder acts for the individual or organisation being advertised is an important safeguard against impersonation. To make it effective, platforms need to establish a chain of assurance covering:

the identity of the person operating the account;
the identity of the business or individual behind the advertisement;
the operator's current authority to act for that advertiser, including through an agency or other intermediary; and
the connection between that authority and the relevant advertising account.
Checking an identity document alone does not establish authority to advertise for a particular organisation. Equally, successful verification does not establish that an advertisement or offer is genuine. The account checks must work alongside Ofcom's proposed financial-services checks, account security, advertising moderation and continuing risk assessment.

We recommend that Ofcom explicitly recognise independently certified digital verification services (DVS) as one proportionate means of providing reusable evidence of identity and relevant attributes under H1. The UK Digital Verification Services Trust Framework provides a common, independently assured foundation that platforms and intermediaries can draw upon. Ofcom should explain this route in its accompanying guidance or examples, while retaining an outcome-based code that permits other effective methods.

Certification of a DVS service must not be presented as certification of an advertiser or endorsement of an advertisement.

In particular, ADVP asks Ofcom to clarify that platforms should:

verify agency or employee authority using evidence from an appropriately reliable source, and refresh that check when a mandate ends, account control changes, or other relevant circumstances call the original assurance into question;
bind verified authority to the account and protect access to it with appropriate authentication and controls over changes to administrators, payment details, domains and advertiser relationships;
use risk-based levels of evidence, with stronger checks where impersonation, regulated products or suspicious changes create greater risk;
permit suitable verified claims to be reused across services, reducing repeated collection of identity documents and the Friction, Effort, Risk and Cost of onboarding legitimate advertisers;
collect and disclose only the information necessary for each check, while retaining an auditable record of the result and its basis; and
provide accessible correction and appeal routes for legitimate advertisers, including sole traders and people who may struggle with conventional identity evidence.
These points also bear on Ofcom's questions about advertising intermediaries. Platforms may obtain assurance through agencies or other parties in the advertising chain, but should be able to establish what was checked, by whom, when, and whether the authority remains valid. Reliance on an intermediary should not leave a gap in the platform's own assessment of whether its measures are effective.

We support the proposed protections against account takeover. A sound onboarding check loses much of its value if a fraudster can subsequently gain control of a legitimate account. We also support proportionate ad-library information and dedicated channels for expert reports, which can help identify impersonation and emerging fraud patterns. Any public indication that an advertiser has been verified should state precisely what was verified; it should not suggest that every claim in an advertisement has been approved.

Finally, we encourage Ofcom to assess the combined effect of these measures on legitimate smaller advertisers as well as on fraud. A reusable, independently assured verification route could improve both protection and access, but its practical benefits should be tested and measured. The code should remain adaptable as assurance methods and fraud tactics change.

ADVP would welcome the opportunity to provide further technical input on the account-check and intermediary examples as Ofcom develops its final codes and guidance.

Q12.A: verification that advertising account holders work for, or on behalf of, the individual or organisation they are advertising

No response

Q12.B: checks and actions to prevent banned advertising account holders returning

No response

Q12.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

No response

Q12.D: repeat checks where there are relevant changes identified on an account.

No response

Q13: 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.

No response

3. Preventing fraudulent financial services advertising

Q14: Do you agree with our proposal? Please provide any arguments and supporting evidence.

No response

4. Countering account takeover

Q15: Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

No response

Q16: Do you have any evidence about account takeover that could inform our assessment, including how frequently it occurs or its impact?

No response

5. Advertising bans

Q17: Do you agree with our proposal? Please provide any arguments and supporting evidence.

No response

Q18: Are you aware of any additional exceptional circumstances in which it may be proportionate for providers to reverse advertising bans?

No response

6. Account appeals

Q19: Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

No response

Volume 4: Moderation

2. Advertising moderation

Q20: Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

No response

3. Terms of service and publicly available statements

Q21: Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

No response

4. Advertising complaints (including DRC for trusted flaggers)

Q22: Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

No response

5. Ad libraries

Q23: Do you agree with our proposal? Please provide any arguments and supporting evidence.

No response

Q24: 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.

No response

Q25: 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?

No response

Additional questions

Q26: Do you agree with our Equality Impact Assessment? Please provide any arguments and supporting evidence.

No response

Q27: Do you agree with our Welsh language assessment? Please provide any arguments and supporting evidence.

No response

Q28: Do you agree with our proposals? Please provide any arguments and supporting evidence.

No response