Consultation response

Field	Value
Responder	Check My Ads Institute
Responder Type	organisation
Org Type	Civil society

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?

'- Yes, please see the following items:
- our report, Advertiser Verification. This report analyses the differences in how platforms verify the identity of their advertiser clients, particularly as it relates to fraudulent advertisers or advertisers engaged in illegal harms.
- our paper, Restoring Fairness for Europe's News Publishers: A Proposal to Break AdTech's Stranglehold. This paper assesses the impacts of the online advertising ecosystem on publishers, including many participants that often go unnoticed, including advertising technology intermediaries, digital advertising agencies, and advertisement verification software.
- our visualisation, Real-Time Bidding Explained
- Links:
-https://checkmyads.org/report/advertiser-verification-report/-https://checkmyads.org/submission/check-my-ads-submits-paper-to-forum-on-information-and-democracy-outlining-solutions-for-a-fair-digital-ad-market/-https://checkmyads.org/rtb-explained/'

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.

Many fraudulent accounts are recidivist offenders that change their name or domain once banned. There should be consideration for improving the identification and analysis of recidivists.
Source:https://londonbusinessjournal.co.uk/2026/05/28/uk-social-media-financial-scams/

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

Yes, these are strong examples of risky characteristics.

5. Our approach to developing Codes measures

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

Yes, but there is a disproportionate focus on taking fraudulent advertising down, instead of prevention.

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.

Yes it is proportionate in a world where platforms like Meta have been found to have made up to 10% of their advertising revenues from fraudulent ads. Link:https://www.reuters.com/investigations/meta-is-earning-fortune-deluge-fraudulent-ads-documents-show-2025-11-06/

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 :

'- Yes. According to our recently published report on advertiser verification, there is no standard across platforms for advertiser verification. This lack of codified verification standards across platforms is one of the key reasons that pervasive ad fraud and scams exist in the digital advertising industry. The proposal calls on providers to create this standard across four mechanisms: (1) the mechanism by which platforms verify ad account holders; (2) the mechanism by which regular checks/audits are made on this verification; (3) and the mechanisms by which risks are flagged and restrictions are applied to the accounts that meet this risk benchmark; and (4) the mechanism fro transparency in which providers must publish a summary of this policy and review/update it every 12 months. Just as the financial industry is bound by know-your-customer (KYC) requirements, advertising platforms should be required to report this information to maintain transparency and fair market practice. "For meaningful transparency to exist within the digital advertising ecosystem, a substantive verification process must be a mandatory prerequisite." (Check My Ads Advertiser Verification Report, 2026, p. 12).
- (Link to advertiser verification report:https://checkmyads.org/report/advertiser-verification-report/)'

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.

We recommend making clear that these checks must come BEFORE advertising services are made available to the potential advertising entity. In other words, these checks must come before ads can be purchased, and not afterwards. These checks should also not be placed after an instance of misbehavior, or as a punitive measure instead of a preventative one. This should be a preventative standard applied across all advertisers before any advertising takes place as a consumer protection benchmark.

3. Preventing fraudulent financial services advertising

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

As know-your-customer (KYC) requirements are required across financial services operations in most jurisdictions to prevent illegal actions and prevent harm, it is more than appropriate to require these checks for financial services advertising as well. While we believe these rules should apply to all advertisers, these rules should especially apply to financial services advertisers because of the higher risk that the fraudulent

advertising of this industry can cause for consumers. In 2025, the Financial Conduct Authority found that more than 1,000 finance-related advertisements from unverified advertisers were identified only on the Meta platforms in one single week, and more than half of these advertisers had previously been flagged by the regulatory authority to the company (source:https://londonbusinessjournal.co.uk/2026/05/28/uk-social-media-financial-scams/). A report from early 2026 indicated that 1 in 4 UK adults have reported to have lost money to a scam advertisement, which is the equivalent of approximately 13.5 million people (source:https://www.publicfirst.co.uk/fraudulent-online-advertising). Without stringent KYC requirements, especially for the financial services industry, which are among the most common and costly online scams (source:https://www.citizensadvice.org.uk/about-us/media-centre/press-releases/millions-stung-by-scams-with-online-shopping-the-top-trap-says-citizens/), this practice will continue to be pervasive, ultimately costing consumers tens of millions per year. Check My Ads agrees with the proposal, and reiterates that while these requirements should be applied to all advertisers as a preventative measure, the financial services industry is a priority in this endeavor.

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.

Yes, we agree. Requiring platforms to mandate security checks for accounts such as two-factor authentication methods can help prevent impersonations and reduce turnaround.

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

No specific evidence.

5. Advertising bans

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

Yes, agreed with the proposal.

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

No, we are not aware of additional exceptional circumstances in which this would be proportionate.

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.

Yes, agreed with the proposal.

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.

Yes, agreed with the proposal.

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.

Yes, agreed with the proposal.

5. Ad libraries

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

Yes, agreed with the proposal.

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.

Yes, agreed with the proposal; however, the dates of which the ads ran should be included, and the amount of money spent on the advertisements, given in GBP currency, should also be given.

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 evidence to be given.

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