Fraudulent Advertising Codes Consultation

Annex 1: Stakeholder responses annex

Consultation

Published 10 July 2026
Closing date for responses: 02 October 2026

Responding to this consultation

How to respond

A1.1 Ofcom would like to receive views and comments on the issues raised in this consultation, by 5pm on Friday 2 October 2026.

A1.2 You can view the online response form here.

A1.3 Alternatively, you can return this by email or post to the address provided in the response form. If your response is a large file, or has supporting charts, tables or other data, please email it to FraudulentAdvertisingConsultation@ofcom.org.uk as an attachment, together with the cover sheet. This email address is for this consultation only and will not be valid after 2 October 2026.

A1.4 Responses may be posted to the address below, marked with the title of the consultation:

Ofcom Online Safety Team

Ofcom

Riverside House

2A Southwark Bridge Road

London

SE1 9HA

A1.5 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:

- send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files; or
- upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.

A1.6 We will publish a transcript of any audio or video responses we receive (unless your response is confidential).

A1.7 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt of a response submitted to us by email.

A1.8 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.

A1.9 It would be helpful if your response could include direct answers to the questions asked in the consultation document. The questions are listed in the 'Consultation questions' subsection below. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.

A1.10 If you want to discuss the issues and questions raised in this consultation, please email to FraudulentAdvertisingConsultation@ofcom.org.uk.

Confidentiality

A1.11 Consultations are more effective if we publish the responses before the consultation period closes. This can help people and organisations with limited resources or familiarity with the

issues to respond in a more informed way. In the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish responses on the Ofcom website at regular intervals during and after the consultation period.

A1.12 If you think your response should be kept confidential, please specify which part(s) this applies to and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.

A1.13 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it, either by not publishing the response at all, or by only publishing the bits that are not confidential. Sometimes we might think it is important to disclose parts of a response that have been marked as confidential for reasons of transparency, but we will consult you before we do. Occasionally we might have a legal obligation to publish information or disclose it in court, but again, as far as possible, we will let you know.

A1.14 Even if your response is not marked as confidential, we might still decide not to publish all or part of it in certain circumstances. For example, if we have concerns about the impact on your privacy or the privacy of others, that the content of the response might facilitate the commission of crime, or about the sensitive nature of the content more generally. If we decide not to publish all or part of your response, we will still take it into account in our consideration of the matter.

A1.15 To fulfil our pre-disclosure duty, we may share a copy of your response with the relevant government department before we publish it on our website.

A1.16 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further in our Terms of Use.

Next steps

A1.17 Following this consultation period, Ofcom plans to publish a statement by mid-2027 at the latest.

A1.18 If you wish, you can register to receive email updates alerting you to new Ofcom publications.

Ofcom's consultation process

A1.19 Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles below.

A1.20 If you have any comments or suggestions on how we manage our consultations, please email us at consult@ofcom.org.uk. We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and individual users, who are less likely to give their opinions through a formal consultation.

A1.21 If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact the corporation secretary:

Corporation Secretary

Ofcom

Riverside House

2a Southwark Bridge Road

London

SE1 9HA

Email: corporationsecretary@ofcom.org.uk

Ofcom's consultation principles

A1.22 Ofcom has seven principles that it follows for every public written consultation:

Before the consultation

A1.23 Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

During the consultation

A1.24 We will be clear about whom we are consulting, why, on what questions and for how long.

A1.25 We will make the consultation document as short and simple as possible, with an overview of no more than two pages. We will try to make it as easy as possible for people to give us a written response.

A1.26 When setting the length of the consultation period, we will consider the nature of our proposals and their potential impact. We will always make clear the closing date for responses. A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.

A1.27 If we are not able to follow any of these seven principles, we will explain why.

After the consultation

A1.28 We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish the responses on our website at regular intervals during and after the consultation period.

A1.29 After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

Consultation coversheet

Basic details

Consultation title: Fraudulent Advertising Codes Consultation

To (Ofcom contact):

Name of respondent: [redacted]

Representing (self or organisation/s): National Trading Standards

Address (if not received by email):

Confidentiality

Please tick below what part of your response you consider is confidential, giving your reasons why

- Nothing [redacted]
- Name/contact details/job title ☐
- Whole response ☐
- Organisation ☐
- Part of the response ☐

If you selected 'Part of the response', please specify which parts:

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

Yes

Declaration

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom aims to publish responses at regular intervals during and after the consultation period. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name [redacted] Signed (if hard copy)

Consultation questions

Please tell us how you came across this consultation.

- ☐ Email from Ofcom
- ☐ Saw it on social media
- [redacted] Found it on Ofcom's website
- ☐ Found it on another website
- ☐ Heard about it on TV or radio
- ☐ Read about it in a newspaper or magazine
- ☐ Heard about it at an event
- ☐ Somebody told me or shared it with me
- ☐ Other (please specify)

Volume 1: Context

Online advertising ecosystem

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

  The overall detail provided in Volume One matches our understanding of the paid-for online advertising ecosystem. In particular, the points regarding the concentration of the market being limited to a small number of services, in particular Google and Meta, reflects our experience. However, we agree that accurately assessing the scale of the issue remains a significant challenge (para 4.13), save for limited instances where we are able to rely on evidential material as part of a criminal investigation (see our response to 'Causes and impacts of fraudulent advertising'). Data available to Trading Standards from consumers reporting their experiences, whether through official reporting channels or through consumer review platforms (e.g. Trustpilot), often does not contain sufficient detail to identify the origin of the issue (i.e. did the consumer begin their journey by clicking a paid-for advertisement). However, our assessment of data in relation to a currently active investigation, where the origin of the suspected fraud could be identified, 93% of consumers reported as having conducted a Google search. Of those reports, 39% reported as having clicked on what they believed to be a paid-for advertisement. Bearing in mind the analysis and other evidence contained in this consultation regarding the proportion of consumers who may not successfully identify a paid-for advertisement (paras 4.4 – 4.6), it is highly likely that whilst this 39% figure is a significant proportion, it underrepresents the true scale of the role fraudulent advertising plays in consumer harm.

Causes and impacts of fraudulent advertising

- **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.**

  The detail provided in Volume One matches our experience in both prosecuting and disrupting harms caused by fraudulent and misleading online advertising. Almost all our cases involve fraudulent actors routinely making use of the scale and reach of online search and social media advertising (para 4.19). In a criminal investigation context, such is the 'return on investment', spends of tens of thousands of pounds per week on search

and social media advertising are not uncommon. Total consumer victims per case commonly run into the thousands and sometimes tens of thousands. Similarly, total losses per case often run to multi millions of pounds. Although more limited in terms of the total likely number of fraud victims, the data in relation to our criminal cases can be particularly helpful as we are relying on evidential material rather than anecdotal reports.

We acknowledge it is also helpful in this context, as set out in para 4.3, to consider online fraud more generally in helping to build an overall understanding of the scale and impact of fraudulent advertising. In that context, a recent desktop exercise undertaken by National Trading Standards identified over 120,000 items of social media content directly linked to fraudulent vehicle sales.

As set out in para 4.17 (and elsewhere in the consultation documents), consumer reporting remains a significant challenge. This is particularly the case where a consumer doesn't realise they have been defrauded until some time after the event, or simply doesn't appreciate that have been defrauded at all. The latter is particularly pertinent, highlighted by the remarks of a learned judge during sentencing in one of our cases. The judge remarked that even though only a small percentage of consumers had reported the fraud, every one of the thousands of 'customers' of the fraudulent business was a fraud victim.

A further point in para 4.17 is also significant. Victims who have lost (relatively) low sums of money will often not realise they are a victim of fraud. In one example we prosecuted, individual victims lost on average £5. However, at the height of the fraud there were an average of 1,000 victims per day. This was driven entirely by fraudulent search engine advertising.

Detailed analysis as to the reasons why consumers don't report are not directly within scope of this consultation. However, we believe it is helpful to highlight that statements given by online fraud victims as part of our investigations support many of the points set out in paras 4.17, 4.18 and further in paras 4.46-4.50 ('Impacts on individuals')

The current active investigation referred to in our response to 'Online advertising ecosystem' also supports the point made in para 1.7 (and elsewhere in the consultation) regarding the impact of fraudulent advertising, in particular in distorting markets and the disproportionate effect on smaller firms. In this example we have data from a trade association that states some of their members have had to exit the market they serve as they are unable to compete with fraudulent advertisements offering the same service but with an artificially lower advertised 'special price'.

We particularly support the view set out in para 4.51 that there is no single profile for victims of fraud. Whilst specific vulnerability characteristics can be a factor, increasingly situational vulnerability is an element that fraudsters will exploit. Two of our current pieces of work highlight this, namely

consumers locked out of their homes and consumers involved in car accidents. Both instances can leave a consumer situationally vulnerable and in both instances we have seen evidence of fraudulent search engine advertising.

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

  We broadly agree with the risky characteristics set out in Volume One. In support of some of the examples set out in para 4.37, we have both prosecuted and disrupted frauds that impersonate brands, public bodies, technology companies and insurance providers. We have also seen recent examples of 'cloaking' (para 4.43) where consumers are redirected to a landing page with content that is entirely different than that which a consumer would encounter if browsing the site from the home page. In several examples, the adverts direct to various pages containing 'offers' for popular consumer electronics (e.g. air fryers, home dehumidifiers) yet the home page for the domain, along with any directly browsable other pages, appears to relate to an entirely different subject matter.

Approach to Codes

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

  We broadly agree with the proposed layered approach to tackling fraudulent advertising.

  As outlined in the consultation, no single intervention can adequately address fraudulent advertising. Account-level controls, effective moderation, reporting mechanisms, governance and transparency are mutually reinforcing. However, the framework should more explicitly recognise that the relevant unit of harm will often be a fraudulent campaign or network rather than an individual advertisement.

  A campaign may involve multiple advertisements, accounts, domains, landing pages and identities. Criminals may alter creative content, move between accounts or services, or impersonate legitimate businesses to circumvent controls. Ofcom itself recognises the role of coordinated networks, impersonation and account takeover.

  As set out in our response to 'Advertising moderation' we recommend an overarching principle that where information indicates that a fraudulent advertisement forms part of wider fraudulent activity, providers should take proportionate steps to identify and disrupt associated accounts,

advertisements and campaigns rather than limiting action to the individual advertisement detected or reported.

More broadly, we strongly believe the final framework should connect all proposed measures into an intelligence-led disruption approach. Removing a fraudulent advertisement is necessary, but it should not always mark the end of the intervention.

National Trading Standards would welcome continued engagement with Ofcom and relevant service providers on practical implementation, particularly trusted-flagger arrangements, fraud-intelligence exchange and advertising-library functionality.

Combined impact assessment

- **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.**

  We agree that the proposed measures are proportionate. As outlined in our response to the 'Protecting people from illegal harms online' consultation (Feb 2024), we acknowledge that any measures sufficient to have a material impact in tackling online fraud are likely to be costly to implement. However, the body of evidence widely available, including the examples we have provided in this response, clearly demonstrates the speed and scale at which fraudulent advertising can reach consumers. As such the measures proposed, and being designed as they are to apply to Category 1 and 2A services, are proportionate to overall level of harm that is likely to relate to such services.

Volume 2: Risk, Governance and Control

Advertising intermediaries

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

  Whilst we agree with the proposal, it is with some reservations. In particular the possible outcome that those seeking to place fraudulent advertising may migrate to advertising intermediaries that do not have regard to these proposals, as noted in para 2.38. Whilst we do not have any specific evidence to support this in the context of fraudulent advertising, we can draw parallels with third-party domain resellers and web hosting providers. In our experience, there are some overseas third-party domain resellers, and

web hosting providers, who are unwilling to cooperate with UK authorities. It is perhaps not surprising that we find these resellers and hosts are the provider of choice for many actors looking to commit fraud against UK consumers. Furthermore, there is also the risk that fraudulent activity could be displaced to user generated content as a consequence. As is highlighted elsewhere in the consultation, this makes it important that measures to tackle fraudulent advertising are consider in conjunction with the providers broader responsibilities in relation to the 'Illegal content safety rules'.

Overall, we feel it is particularly important that, if implemented, the proposals regarding 'all reasonable endeavours', and providers ensuring the advertising intermediaries they work with implement appropriate measures themselves, are robustly applied.

- **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.**

  The examples provided serve as a helpful demonstration as to how 'all reasonable endeavours' should be implemented; setting clear expectations of both the provider and the intermediary. We provide this comment in the context of the important points raised in our answer to 'Advertising intermediaries'.

Fraud indicator assessment

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

  We strongly agree with the proposal and welcome the argument that increased weight should be applied by providers to reports of fraudulent advertising received from 'trusted flaggers'. However, as set out in our response to 'Advertising complaints', we firmly believe Ofcom should consider adding further consumer bodies, and specifically Trading Standards, to the list of 'trusted flaggers'.

  In our view, the proposed annual review should be regarded as a minimum governance requirement rather than an operational review cycle. Where credible intelligence identifies a new mode of fraud, providers should be capable of incorporating relevant indicators and adjusting controls promptly.

We also strongly agree that connected content should form an important part of any assessments. We repeatedly see evidence where phone numbers, business addresses, contact e-mail addresses and the like are used across multiple fraudulent domains.

- **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?**

  We feel the suggested sources reflect a sufficiently broad range of sources that, if implemented by providers, should support a robust range of evidence to support their assessments of likely fraudulent activity.

Governance and accountability

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

  We agree with the proposals. As has been evidenced in this consultation, and elsewhere, the scale and impacts of fraudulent advertising is significant. Having suitably senior accountability for providers, along with robust monitoring and assurance processes and associated training lends appropriate weight to the expected level of response providers should implement.

  We do however believe the Codes should provide greater clarity on the expectation of providers' senior governance bodies, including that they should have sufficient information to assess matters including:

  - prevalence and consumer exposure
  - speed of detection and removal
  - repeat offending and re-entry following bans
  - effectiveness of advertiser verification
  - performance of trusted-flagger routes
  - recurring fraud typologies.

  Independent assurance should test whether controls operate effectively rather than merely confirming that documented procedures exist.

Testing advertisement generation tools

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

We agree with the proposal. We have already seen evidence of what we strongly suspect are AI generated advertisements that divert consumers onto fraudulent web sites. We also strongly suspect the destination web sites are AI generated. The types of advertisements and associated web sites we have identified relate to a range of products including clothing, fashion items (handbags, jewellery etc.) and memorabilia being sold for supposed charitable causes. All fall loosely under the banner of 'online shopping fraud'. The associated web sites are generated at increasing scale and targeted at UK consumers from overseas. We believe it is highly likely the use of AI advertisement tools is an integral part of the fraud.

Volume 3: Ensuring account integrity

Account checks and actions

- **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 or, or on behalf of, the individual or organisation they are advertising;**

    b. **checks and actions to prevent banned advertising account holders returning;**

    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; and**

    d. **repeat checks where there are relevant changes identified on an account. N**

We strongly agree with the proposal and, as set out in our response to 'Approach to codes', acknowledge that no single measure can have a marked effect on the scale, sophistication and speed with which online fraud is perpetrated. In particular we firmly support the view that account checks must be ongoing rather than one-off verification processes. Similarly, NTS supports the proposed verification of advertisers of financial services, including checks that advertisers have appropriate legal permissions before relevant advertisements can be encountered by UK users.

On a broader point, and as we have stated elsewhere in this response, with all these measures it will be important to ensure that SMEs are not disproportionately affected. Although covered in a later section we feel it is important to emphasise here that any appeal that results from adverts being banned as part of these measures needs to balance the need of swift action with quickly being able to restore accounts that have been incorrectly banned.

In relation to points a and d, whilst we don't have evidence in relation to fraudulent advertising specifically, it is worth noting that instances of banned account holders returning is a tactic we regularly see used in other forms of online harm. This ranges from the sale of counterfeit and unsafe goods to other illicit products such as tobacco and vapes. As enforcers we are able to identify when there are links between banned and replacement accounts so checks to ensure this does not happen in relation to fraudulent advertising must be robust.

In relation to point c, example 2.11 highlighted in para 2.40 is a factor we observe regularly. The evidence we refer to in our response to 'Testing advertisement generation tools' is a clear demonstration of this. All the web sites we have identified that appear to be linked to AI generated advertisements claim to be for retail outlets based around the UK. However, the companies placing the adverts, and registering the domains for the destination URLs, are all based outside the UK.

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 are not aware of other account checks.

Preventing fraudulent financial services advertising

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

  Financial services advertising is not a core Trading Standards activity and our understanding is perhaps not as developed as other organisations who will be better placed to comment.

Countering account takeover

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

  We agree with the proposals.

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

  Although not related to fraudulent advertising specifically, account takeover is a tactic we observe regularly in relation to other forms of online harm, including fraud. As outlined in the consultation, a key factor is the element of trust. We often see instances where fraudulent actors will take over long established social media accounts. Having a realistic looking profile with a history of posts, friends and the like then enables the fraudsters to pose as a genuine person. The accounts are then used for a variety of fraudulent purposes, including acting a referrers for investment type frauds or advertising high value items for sale (e.g. motorhomes, cars etc.)

Advertising bans

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

  We agree with the proposals. We particularly support the comments in paras 5.47 to 5.49 in relation to bans versus escalating sanctions policies. In the context of regulation, applying a regulatory sanction to a determined fraudster has almost no impact. We regularly see this in relation to our work in suspending domains being used to target UK consumers. Although attempts to prevent the harm by other regulatory means can be used, in almost all instances a suspension of the domain (analogous to banning under these proposals) proves to be the only effective measure to stop the harm.

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

  We are not aware of any additional exceptional circumstances.

Account appeals

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

  We agree with the proposals. As highlighted in our response to 'Account checks and actions', an appeals process is particularly important in relation to SMEs. As outlined in the consultation, any appeals process must balance the need to take swift action to prevent fraudulent adverting with the needs of enabling misapplied bans to be overturned. The effect of a misapplied ban would likely have a disproportionate impact on an SME and therefore the appeals process needs to be designed accordingly.

Volume 4: Moderation

Advertising moderation

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

  We agree with the proposals. However, the effectiveness of any moderation should ultimately be judged not simply by how quickly reported advertisements are removed, but by how effectively providers prevent fraudulent advertising reaching consumers and prevent perpetrators repeatedly accessing advertising systems. This is critical otherwise the approach becomes a simple whack-a-mole exercise rather than a one that builds in safety.

  We believe Ofcom should consider setting out more explicitly the kinds of measures that should be used to assess the impact of providers' advertising moderation, such as:

  - time from credible notification to review
  - time from confirmation of fraud to effective removal
  - reach or exposure before removal
  - recurrence of similar fraudulent advertisements.

  Critically, confirming that one advertisement is fraudulent should, where appropriate, trigger consideration of whether connected advertisements or accounts warrant investigation.

We particularly welcome the comments in para 2.16 in relation to linked fraudulent content and agree that providers should take steps in relation to their 'Illegal content safety duties' when such material is identified. Although the specific example of organic search content is referred to in the consultation, we also suggest this could equally be applied in relation to linked social media accounts. For example, we regularly observe that linked social media accounts will have large amounts of 'friends' or 'followers' accounts. A feature often observed with such accounts is they appear to be non-UK accounts, which would tend to indicate they are a deliberate attempt an air of authenticity to the content.

In relation to FAU C4, as referenced in para 2.109 we agree that any action to target fraudulent advertisements should balance the needs of speed and accuracy (see our comments on response to 'Account actions and checks' and 'Account appeals').

In relation to FAU C5 and para 2.126 we particularly emphasise the comments in relation to the likely reach of fraudulent advertisements. This is important in the context of comments in Volume One, para 5.46 which refer to the "nature, and severity, of potential harm to individuals". Whilst the risk of harm to an individual is undoubtedly a key factor, in our experience a significant number of frauds are what we would classify as 'high volume/low value'. In other words, the loss to an individual is relatively small. However, the reach of the advertisements is such that the total number of victims can be in the tens of thousands, thus the fraudsters will acquire millions of pounds. For these reasons we strongly agree that advertising reach is a significant factor and is arguably of equal importance to the potential individual loss to a consumer.

Terms of service and publicly available statements

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

  We agree with the proposals. For the same reasons as set out in our comments on 'Advertising complaints', we agree that the measures outlined in para 3.9 concerning accessibility are of particular importance.

Advertising complaints

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

  We agree with the proposals.

In relation to FAU D2 and FAS D2, we support the need to ensure reporting systems to be easy to find and use. It is widely acknowledged that key factors in the low level of fraud reporting more generally are being able to identify how (and where) to report the fraud and for any reporting mechanism to be designed to enable the report to be submitted with minimal friction. As noted in para 4.66 this includes the need for the reporting mechanism to take account of user vulnerability (including situational vulnerability) and neurodiversity.

In relation to FAU D7 and FAS D7, we welcome the continued emphasis on providers operating dedicated 'trusted flaggers' systems. We restate our comments in response to 'Protecting people from illegal harms online' consultation (Feb 2024), in that consideration should be given to adding Trading Standards to the list of expected 'trusted flaggers'. Trading Standards has significant experience in tackling fraud and scams, including online fraud and scams. We are already part of 'trusted flagger' programs on a voluntary basis which we believe demonstrates our suitability for inclusion in the designated 'trusted flaggers' on a formal basis.

Ad libraries

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

  We agree with the proposals.

- **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.**

  We highlight para 5.69 and the statement from the ASA and the importance of advertising reach. As noted in our comments on 'Advertising moderation', a significant factor in the online frauds we encounter is the sheer volume of victims. For this reason, the inclusion of 'target reach' as part of ad libraries would be welcomed.

  We further recommend that Ofcom consider whether information concerning confirmed fraudulent advertisements can appropriately remain accessible for longer than one year. Investigations and subsequent enforcement proceedings may substantially outlast the original campaign.

- **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?**

We have no comment to make on this point.

S5.69 TARGET REACH AGREE WITH ASA ASSESSMENT RE SCALE OF REACH (SEE RESPONSE TO ADVERTISING MODERATION).

Annexes

Equality Impact Assessment and Welsh language assessment

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

  We agree with Equality Impact assessment.

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

  We have no comment on this point.

Guidance on making fraudulent advertising judgements: updates to the Illegal Content Judgements Guidance

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

  We agree with the proposals. In particular we support the points made in A9.45 to A9.52 in the URL scanning technology should considered as "reasonably available information".