



# Behavioural Audit of Services with Advertising Functionality

## Key Findings Report



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# Executive Summary

This report details research conducted by Ofcom's Behavioural Insight Hub to examine how platform design within advertising functionalities influences user (including advertiser) behaviour and the risks associated with fraudulent advertising through a behavioural audit.

This research was undertaken to support the development of regulatory codes of practice under the UK Online Safety Act (OSA), specifically focusing on duties relating to fraudulent advertising.

By systematically mapping the user/advertiser journey, we found the following:

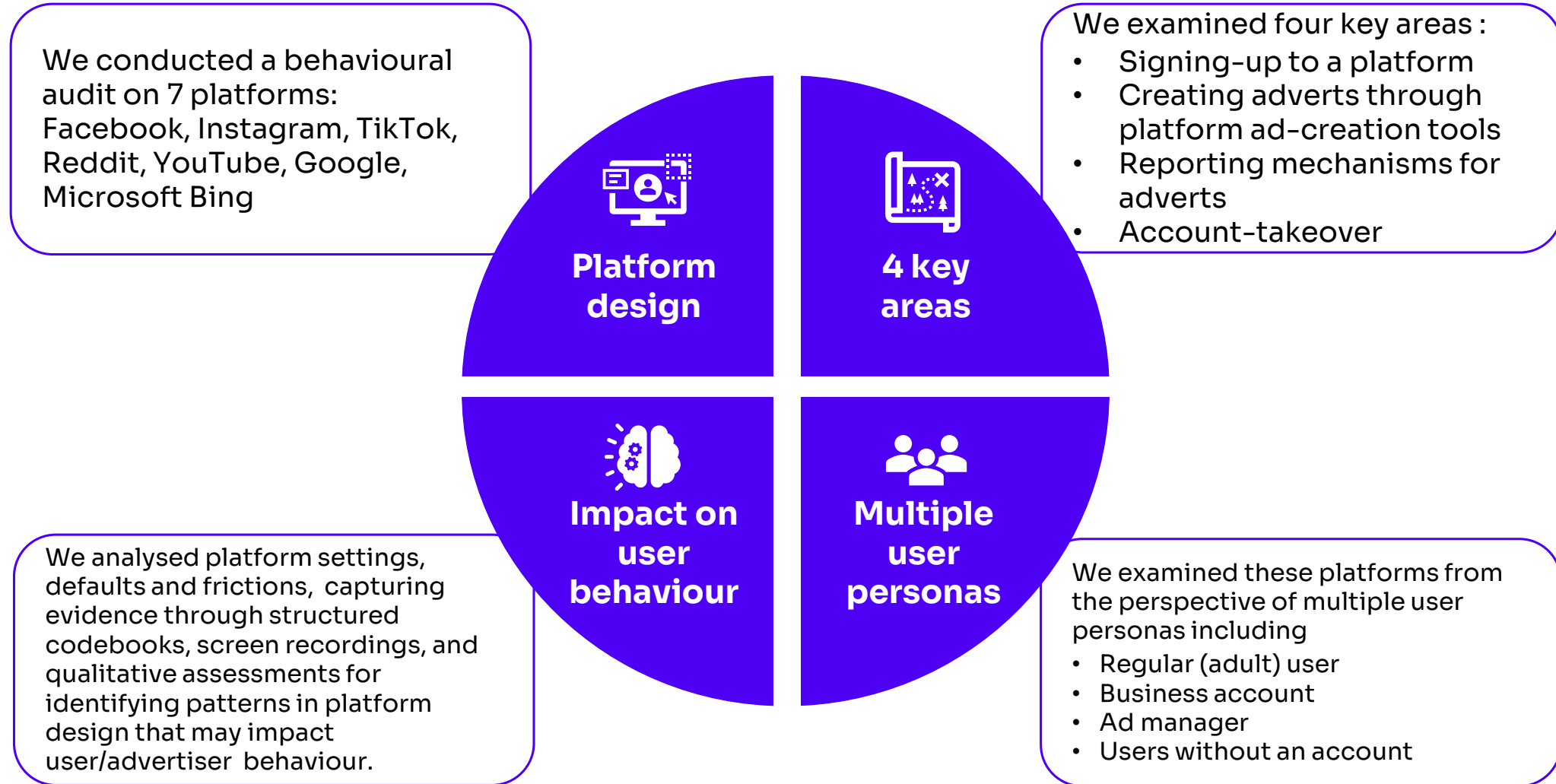
- Across the sign-up process, systems and processes seemed to prioritise speed and ease of use, often at the expense of verification, transparency, and early risk mitigation.
- Ad creation workflows appeared to be designed to increase reach, spend, and performance while safeguards and policies are less prominent at key decision points.
- Reporting mechanisms for adverts and advertisers were available but were sometimes complex and provided limited feedback.
- Account security was generally weak, with weak default protections and unclear escalation routes.

While this research delivers important insights into platforms' design features, it only provides a snapshot of platform design and practices at a specific point in time and across a limited set of services and user journeys.<sup>1</sup> Findings therefore illustrate systemic design patterns rather than offering an exhaustive or definitive assessment of all platform practices.

<sup>1</sup> We do not identify any platform in any of the published findings. All findings are anonymous, and where necessary platform names are redacted.

# Executive Summary – Overall approach


*We examined how platform design within advertising functionalities influence user behaviour and online safety*



# Executive Summary - Methodology

This research uses a behavioural audit designed and conducted by Ofcom's Behavioural Insight Hub to inform our understanding of how fraudulent advertising may occur on major online platforms. The research supports the development of regulatory codes of practice under the UK Online Safety Act (OSA), specifically focusing on duties relating to fraudulent advertising.

Using researcher-created accounts with structured, screen-recorded journeys across several platforms, the study systematically maps platform design features, sign-up processes, advertising workflows, reporting mechanisms, and account security features. It builds on previous behavioural audits and offers comparative insights into how platform design and Online Choice Architecture influence user journeys and risk exposure.

 Note: All information reflects the platform features and settings available between October and November 2025. Subsequent updates or changes by platforms or cached-versions may mean that some details have changed.

# Executive Summary - Results

Platform design choices across the advertising lifecycle tend to prioritise helping advertisers create accounts, upload and post ads quickly while maximising reach. Some design elements may not be effective at deterring bad actors, particularly where safeguards are less prominent or introduced later in the process.

## Sign-up & verification

- Verification requirements are often deferred, allowing advertisers to run ads before meaningful checks are completed.
- Policies that describe the advertising rules of the platform (Advertising Policies) are not always clearly surfaced at sign-up and are often located within broader terms or linked pages.

## Creating an advert

- Ad-creation tools frequently present default options that favour wider reach or higher spend, which may influence advertiser decision-making.
- Links to the external websites (external links) appear to receive limited upfront review, meaning ads may go live before all elements are fully assessed.

## Reporting mechanisms

- Reporting tools for adverts are available but are sometimes within menus and require several steps to navigate.
- Feedback on reporting outcomes is generally limited, with few platforms providing updates on outcome.

## Account takeovers

- Process for reporting account takeover in an advertising context are not always clearly signposted and may be located within general help flows.
- Default security protections vary across platforms, and many services require users to actively enable additional measures.

These results are useful for how platform design may contribute to the emergence and persistence of fraudulent advertisements.

# Policy Context

## Statutory background - Fraudulent Advertising Duties

- Under the OSA, Category 1 and Category 2A services must use proportionate systems and processes designed to prevent individuals encountering fraudulent advertisements, limit how long such content is present on the service and swiftly take down such content once aware of it or notified of it.
- On Category 1 services, fraudulent advertisements are defined as paid-for advertisements that amount to prescribed fraud or financial offences under the Act. These are not regulated user-generated content.<sup>1</sup>
- On Category 2A services, fraudulent advertisements are defined as paid-for advertisements that amount to prescribed fraud or financial offences under the Act.
- On Category 2A services, this duty applies only to paid-for advertisements encountered in or via search results. Paid-for advertisements are regulated separately and excluded from the definition of “search content.”

## Need for an evidence base

- Ofcom must prepare and issue a code of practice setting out recommended measures for the purpose of compliance with the fraudulent advertising duties for providers of Category 1 and 2A services.
- This research supports Ofcom in developing the fraudulent advertising code of practice.

<sup>1</sup> The Act treats content as user generated content if it is content that is generated directly or indirectly by a user of the service, and that may be encountered on the service, including content that is shared, uploaded or created by users. RUGC is UGC except for specific content which is excluded by s55(2) of the OSA.

# Purpose of this research

This research addresses key evidence gaps by examining platform design and processes relevant to:

- User and advertiser sign-up and checks,
- Creating and configuring adverts through platform ad-creation tools,
- Reporting mechanisms for adverts, and
- Account takeover.

By systematically mapping these processes across multiple services, the research identifies where risks may arise and where regulatory measures are likely to be most effective.

The findings have been used to inform Ofcom's policy proposals for the fraudulent advertising codes and gather insights about current platform advertising practices.



# Methodology







A behavioural audit can be used to **systematically map online design practices** and **evaluate** their potential impact on **user behaviour and outcomes.**



# Background

Four key areas of interest were identified:

Research questions

 <b>Signing up to an online service</b>	 <b>Process of creating an advert</b>	 <b>Reporting mechanism</b>	 <b>Account takeover</b>
<ul style="list-style-type: none"> <li>• What information is collected upfront from users who intend to advertise? How do platforms ask users if they are a business?</li> <li>• Is there any verification and how are the verification steps presented?</li> <li>• What forms of verification are required during sign-up?</li> <li>• Are Advertising Policies presented to the users?</li> </ul>	<ul style="list-style-type: none"> <li>• How is the ad creation interface structured?</li> <li>• Are external links allowed, and are they vetted during ad setup?</li> <li>• How granular is audience targeting, and can it be used to exploit vulnerable groups?</li> <li>• Are there any prompts or nudges that encourage broad or aggressive targeting?</li> </ul>	<ul style="list-style-type: none"> <li>• Does a reporting function for adverts exist? How is it presented to users?</li> <li>• How can a user report an ad that they think might be fraudulent?</li> <li>• What instant feedback is provided to a user about a report?</li> </ul>	<ul style="list-style-type: none"> <li>• Are there mechanisms to detect sudden changes in login behaviour (e.g. location, device type, activity)?</li> <li>• Are account holders notified of changes to key security settings (e.g. password, contact info)?</li> <li>• Can the account owner and/or other users report an account takeover?</li> </ul>



## Help Centre

Is there a Help Centre for advertisement related issues available? Is there support available within a Help Centre to help users with this feature?



## Discrepancies among types of accounts

Are there differences between the experiences of business account, ad manager account and regular user account on the platform?

# Background

*The audit used researcher accounts to examine differences in platform design and user experience.*

The team created four account types to reflect different user roles and access levels. These accounts were used to observe how platforms present features, tools, and advertising functionalities across user types:

- Regular user account – simulated a standard user who do not intend to advertise.
- Business account – used to access business-related features.
- Ad manager account – used to explore advertising tools and campaign workflows.
- User without an account – used to assess what is visible and accessible without logging in.

Journeys were undertaken on iPhone apps for regular and business accounts, and via web browsers for ad manager accounts and unauthenticated access. This supported systematic comparison of platform behaviour across different user types.

# Background

The audit reviewed online choice architecture of seven online services with advertisement functionality.

<b>Platform</b>	<b>Feeds selected</b>
<b>Facebook</b>	Facebook Home, Facebook Reels
<b>Instagram</b>	Instagram Personal Feed, Instagram Reels, Instagram Search and Explore page
<b>Google</b>	Google Search, Google Shopping
<b>YouTube</b>	YouTube Home, YouTube Search, YouTube Shorts
<b>Reddit</b>	Reddit Homepage, Reddit Search
<b>Bing</b>	Bing Search
<b>TikTok</b>	TikTok Explore, TikTok For you

# Methodology

To develop the taxonomy of Online Choice Architecture (OCA) practices, the researchers reviewed the available evidence on OCA on online platforms.<sup>1,2</sup> The main paper informing this taxonomy consists of a discussion paper produced by the Competitions & Markets Authority on OCA.<sup>3</sup>

Ofcom's A-Sparc model was used to go through the potential steps involved in exploring each key area.<sup>4</sup> Based on this, we produced a long list of OCA practices, which we then combined to eliminate duplication or very similar practices.

More details on the Methodology can be found [here](#).

<sup>1</sup> Ofcom (2025). [Behavioural Audit of Online Services](#).

<sup>2</sup> Ofcom. (2024). [Understanding Online Choices, Preferences, and Welfare](#).

<sup>3</sup> Competition & Market Authority. (2022). *Online Choice Architecture. How digital design can harm competition and consumers*. [Available here](#)

<sup>4</sup> Ofcom. (2021). *The A-SPARC model of online platforms*. [Available here](#)

# Limitations

**Snapshot in time:** The audit presents a snapshot of platform features and functionalities as they existed during October and November 2025. Platforms frequently update their services or cached content, so some details described may no longer be current.

**Accounts created for research purposes :** The use of newly created accounts may not fully reflect the experiences of long-standing or typical users, as platform algorithms and risk signals may engage differently over time.

**Scope of assessment:** This audit did not measure the prevalence of fraudulent advertising but instead focused on examining system design and operational processes during the period of study.

**No advertising:** The audit did not involve publishing adverts or running advertising campaigns over time. This was for ethical and safeguarding reasons. As a result, researcher accounts may not have triggered certain automated checks, escalations, or bespoke checks processes that could be activated following sustained advertising activity, higher spend, or exposure to a wider range of products or services.

# Findings: Sign-up



## Insight #1

Sign-up processes were designed to enable users to progress quickly through the onboarding flow



# Low friction environment during sign-up

Sign-up flows were designed to maximise completion and minimise friction, often using click-wrap agreements and forced outcomes. \*

Platforms linked advertising accounts and tools with existing user accounts (e.g., [✕], [✕]), encouraging users to remain within the platform's ecosystem.

Advertising policies were rarely made clear at sign-up, often hidden in terms or billing pages.

**7/7** platforms had Terms and Services (T&S), other policies were hyperlinked with passive agreement and bundled together at sign-up.

**1/7** platforms displayed its Anti-Discriminatory advertisement policy upfront.

\* Click-wrap agreements are user agreements where users must click an "agree" or "accept" button, often seeing only a brief summary of the terms. Forced actions/outcomes are changes to the outcome without giving consumers a choice. For more definitions of the Online Choice Architectures referred to in this report please see the Annex.

# Limited transparency in how and when users can advertise

Platforms varied significantly in how they presented checks and additional requirements. While some ([X], [X]) made ‘verification\*’ mandatory to continue running ads, others ([X], [X], [X]) allowed advertisers to proceed without completing checks.

Platforms did not transparently explain if users needed to go through verification before advertising.

On most platforms, advertisers could run ads before checks were fully completed.

Information about checks was sometimes located within secondary menus, which may make it less visible and clear at earlier stages of the advertiser journey.

**3/7**

**platforms had mandatory ‘verification’ with a deadline.**

\* The term ‘verification’ was used by the platforms themselves, where they required advertisers to provide information to verify the authenticity of the business via legal documents, business address, VAT information, etc.

# Information collected about potential advertisers

Platforms collected different types and amounts of information from advertisers at sign-up.

Some platforms ([X] and [X]) requested basic details, such as a phone number, business name, and stated purpose of the account.

Other platforms required additional information, including billing details, business location, website URL, currency, time zone, and intended use of the account.

**On 4/7**

**platforms, advertisers were able to progress to running ads after providing a phone number, email address and/or payment method, without visible confirmation of further checks at that point in the journey.**

Account details Step 8 of 10

Legal business name

Phone number

**Business location** ✕

**Business** What it is: This is the country or region where you conduct your business activities.

**Why it's important:** Business location affects tax requirements and eligibility for certain programs.

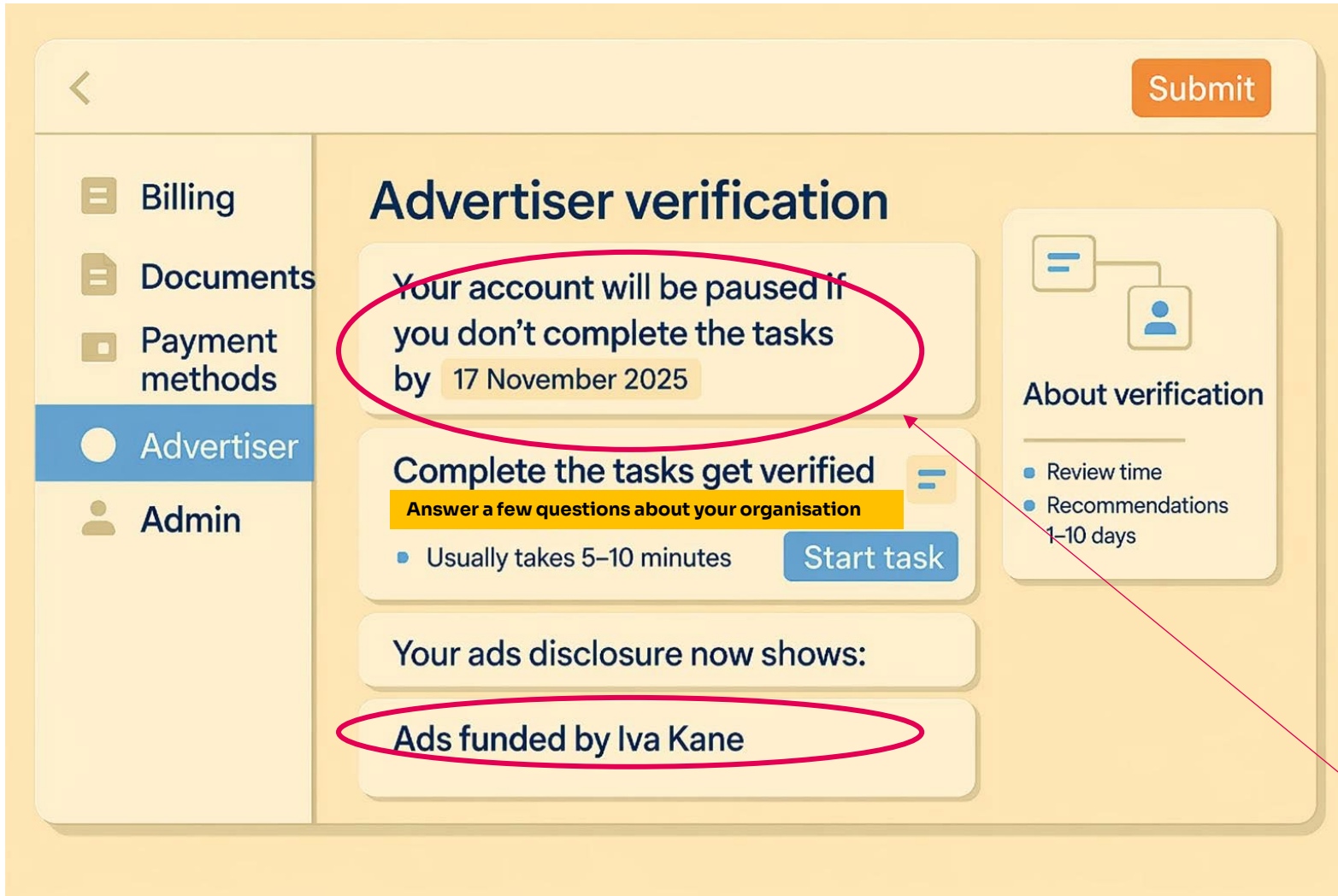
**Address** What you need to know:

- Monthly invoice customers should contact Support before updating business location.
- Changing business location may not be allowed in some countries.

[Learn more](#)

Stylised version of the sign-up information requirements page

# On most platforms, users could run ads without completed checks



Platforms varied significantly in how they presented ‘verification’ requirements and what they asked for.

Some platforms put accounts on a temporary probation/pause until the ‘verification’ processes were completed.

Stylised version showing how the process offers more clarity, social accountability and urgency with a deadline.










# Additional checks for different types of adverts

**On 3/7** platforms, additional checks or authorisation options were required for different types of adverts or accounts.

Additional checks were sometimes required for different types of ads. For example, on one service ([X]), different 'verification' and authorisation requirements became visible only when advertisers actively searched for them. These included a range of verification requirements depending on what was being advertised (e.g. CBD products or addiction treatment services) and the advertiser's location (e.g. Singapore, India, Taiwan).

These requirements were not always visible at earlier stages of the advertiser journey and may appear only when advertisers actively navigated settings or attempted to advertise specific content.

## Additional verification requirements

-  You need to request authorisation for each account that advertise addiction treatment centres.
-  To deliver ads in Singapore, you will need to declare a verified beneficiary and payer for the ad.
-  You need to request authorisation for each account that will advertise CBD.
-  You may need to verify your identity to run ads in Singapore.
-  To become authorised to advertise online gambling and gaming, you'll need to provide information about where and what you'll advertise, your business and your website or app.
-  Verify a phone number for each account that you want to use.
-  You need to request authorisation for each account that will advertise prescription drugs.
-  To run ads in Taiwan, you need to provide additional information about who is benefiting from and paying for the ad. You can provide the authorisation for that person or organization.
-  To run ads about financial services and delivered to Australia, you need to provide additional information about who is benefiting from and paying for the ad and provide the financial service license number' for that person or organization.

## Insight #2

Advertising policies were not always prominent during the advertiser journey



# Advertising policies were not consistently signposted

Advertising policies were not always prominently signposted during sign-up.

Many platforms used click-wrap agreements\*, with policies typically accessible through Terms of Service or after navigating to billing-related pages.

Consequences for violating Terms of Service (e.g., account suspension) were typically mentioned at later stages and only after any policy breaches occurred.

\* Please refer to the appendix for definitions of the Online Choice Architectures referred to in this report.

Step 3/3

## Almost done

Just a few more things

First name \*  Last name \*

Business website

Business industry

I work with an advertising agency

By clicking Finish, I agree to the terms and conditions

**New! Find all business products here.**

Easily discover and toggle between business products with our new consolidated menu.

U user8784673334924

I have reviewed and will abide by the Anti-Discrimination Ad Policy and all applicable laws.

I will not use Advertising for any wrongfully discriminatory practices.

By clicking Accept, I agree to the terms and conditions.

Stylised version: Ad policies use click-wrap agreements and defaults

## Insight #3

Switching to professional/business mode was necessary to run ads and was easy to do

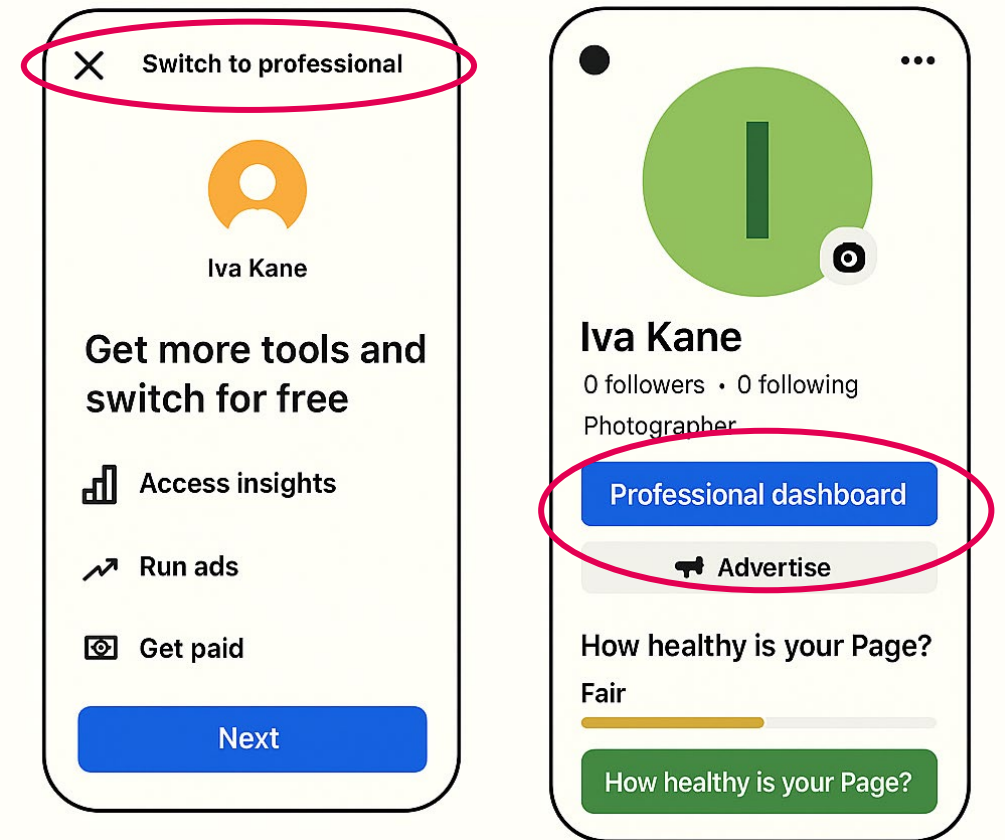


# Essential to switch to business/professional mode

## Business accounts/details were required to use advertisement

**tools:** All platforms required business accounts/professional modes to create and run ads. They often asked for more detailed information (e.g., company name, website, VAT details), and sometimes involved further checks, though the nature and consistency of these verifications varied across services.

Personal accounts usually required only basic details (such as name, email, or phone number). However, several platforms allowed personal accounts to begin advertising after making minimal changes—for example, switching to professional mode or adding a business-related URL.



*Stylised version of platforms: While [X] required a [X] page with Professional Mode, [X] just required switching to the professional mode for advertising.*

# Clear differences in business/professional modes across platforms

Business account features and functionalities varied across platforms, with some relying more heavily on forced actions/outcomes. For example:

- *One platform ([X]) provided temporary “registered” status without requiring formal verification.*
- *One platform ([X]) had a forced delay of 24 hour before allowing a page under professional mode to run ads.*
- *One platform ([X]) required a mandatory channel to run video ads.*
- *Two platforms ([X] and [X]) required a mandatory business URL link alongside the ad. (Note: whether the external link undergoes any additional checks or not was out of the scope of this audit.)*

## Tell us about your business

Provide information to help create effective ads

Business name (optional)

Where should people go after clicking your ad?

**External link**

This can be a web page or social media page

Back

Next

Stylised version of the platform asking for business information

## Insight #4

Security settings were often weak or turned off by default



# Strong security settings required manual activation

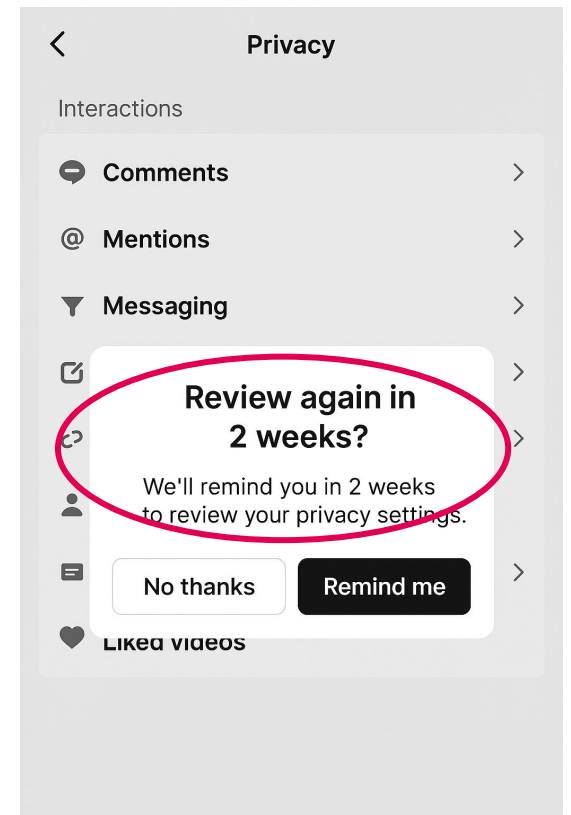
Security defaults: Multi-factor authentication (MFA) and CAPTCHA were not widely used. Where available, MFA was typically off by default and prompts to enable additional security appeared infrequently. Most security features required users to locate and activate them manually.

**7/7** platforms had MFA and additional security settings defaulted off.

**1/7** platforms had CAPTCHA prompts ([X]).

**2/7** platforms had occasional reminders to review the security settings ([X] and [X]).

Stylised version of settings: The onus is on the users to change settings, review, and undergo security checks including activating MFA by turning on reminders and alerts.



# Security review with changes in account activity

Weak security defaults: Changes in log-in locations and password changes only alerted researchers through emails on some platforms ([X<] and [X<]). Across all platforms, using a VPN did not trigger any additional security reviews or safeguarding measures for the users. \*

*\*More on this is discussed in Account takeover (slide 57)*

## Iva, you have 180 days to take action.

Hi Iva,

Your account has been suspended. This is because your account, or activity on it, doesn't follow the service's Community Standards on account integrity.

If you believe your account was suspended by mistake, you have 180 days to appeal the decision. If you do not submit an appeal within this timeframe, your account will be permanently disabled.



Iva Kane

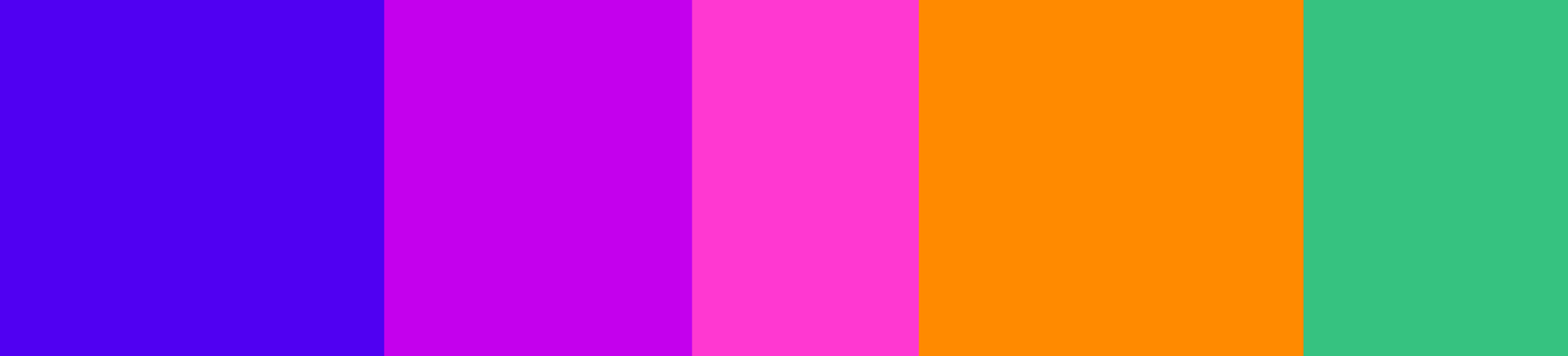
Appeal

Stylised version of the email alert received.

# Sign-up insights: Why these matter?

Insights	Potential Behavioural Impacts
<p>Sign-up processes were designed to help users move quickly through onboarding.</p>	<p>Fast, low-friction onboarding may encourage users to accept terms without reading them, increasing sign-ups.</p> <p>This can reduce informed consent and awareness of obligations and settings. As well as, reducing frictions for fraudulent advertisers to sign-up.</p>
<p>Advertising policies were not always visible during the advertiser journey.</p>	<p>When ad policies are hidden behind click-wrap terms and only highlighted after a breach, advertisers may not fully understand the rules, requirements, or potential consequences. As a result, compliance may only become clear once a rule is broken.</p> <p>This can increase accidental policy breaches and reduce deterrence of fraudulent activity where consequences are not clearly or timely communicated.</p>
<p>Switching to professional/business mode was necessary to run ads and was easy to do.</p>	<p>Allowing users to switch easily into business mode through minimal account updates, may reduce advertiser accountability, as users might be less likely to recognise their responsibilities or be aware of relevant advertiser terms.</p>
<p>Security settings were often weak and turned off by default.</p>	<p>Additional security settings being defaulted off might lead them to remain turned off, especially if users are not reminded by services.</p> <p>This can increase vulnerability to account takeovers, allowing hijackers to run fraudulent ads, change payment details, and exploit trust in established accounts.</p>

# Findings: Creating an Ad



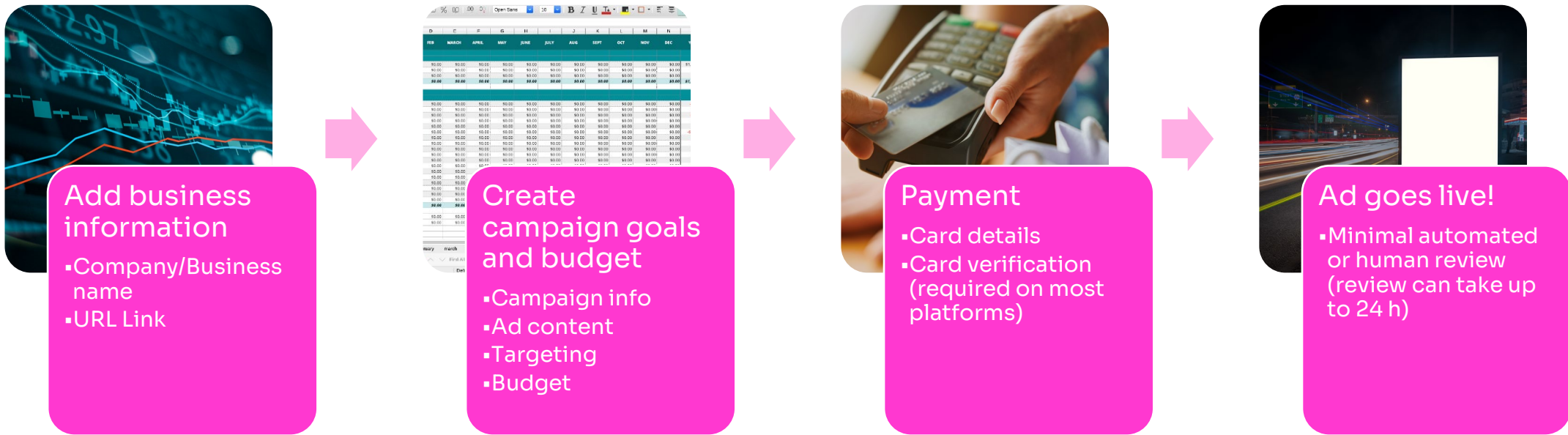
## Insight #1

Ad Manager workflow was fairly standardised across platforms, but interfaces were complex



# Standardisation in ad creation flow

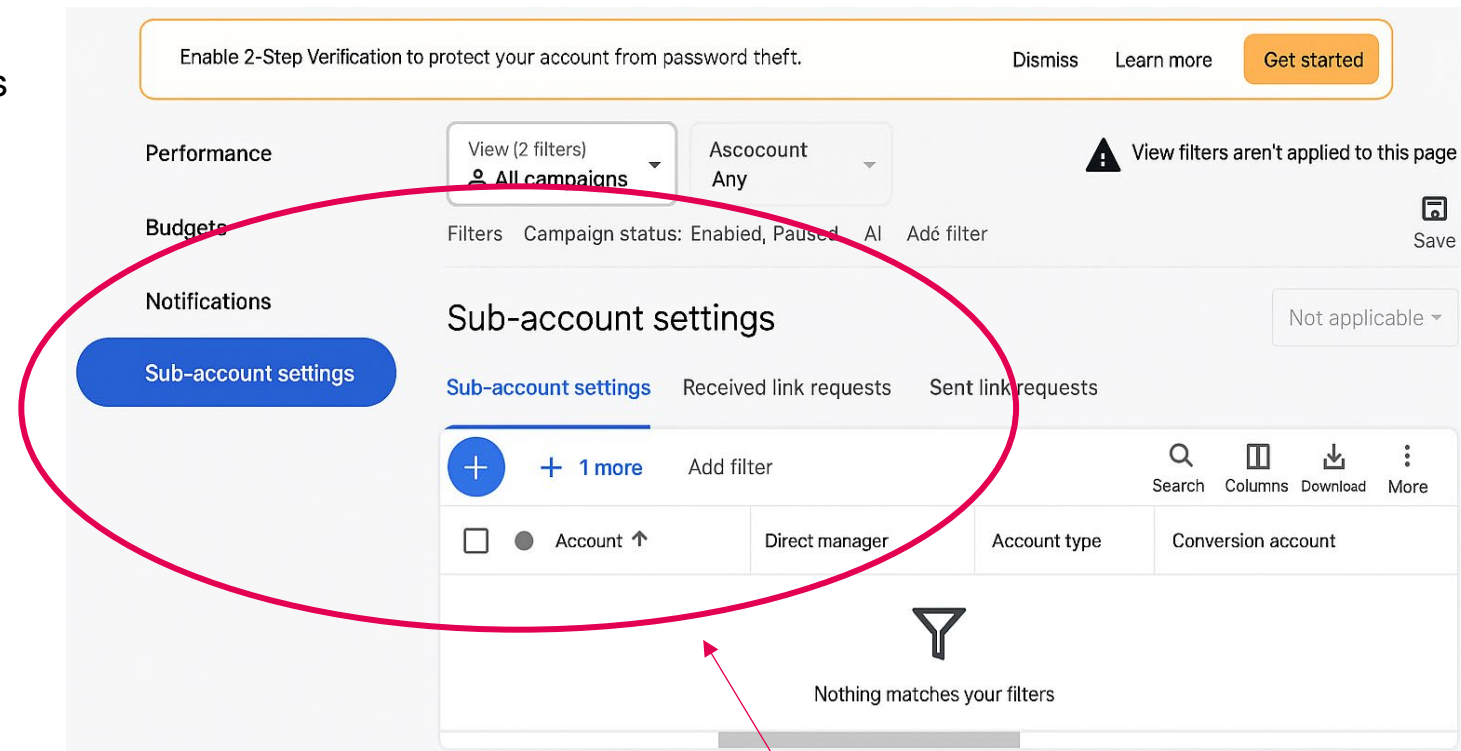
There was a standard flow across platforms in the ad-creation process after the sign-up for business accounts/professional modes. This is shown in the chart below:



# However, complex interfaces and workflows on Ad Manager

Ad Manager settings had more complex interfaces and workflows than Business accounts settings (e.g., [X] and [X]).

Information or controls were distributed across multiple sections, which may make advertisers more likely to rely on default options, particularly if they are unfamiliar with the platform.



Stylised version of Ad manager - Accessing various tools and settings on the [X] Ad Manager involved a high volume of options and information. Navigating multiple dashboards, dense settings, and inconsistent workflows made it harder to efficiently set up, manage, and optimise campaigns as a first-time user.

# Comparison of Business and Ad manager Accounts

Ad creation steps were broadly similar across business accounts and Ad Manager tools, with platforms typically requiring the same core information (e.g. campaign objectives, targeting, budget, payment details) before ads could be published. The differences related primarily to interface complexity, usage, and navigation, rather than the presence of stronger safeguards.

- Business accounts: Enabled access to additional features (e.g. analytics, shops) but did not consistently introduce strong safeguards at early stages of the ad creation journey. Advertising policies, verification signals, and integrity-related information were not always made more salient compared to other account types.
- Ad Manager interfaces: Offered more advanced controls, sharing of ownership and access, and configuration options, but were often more complex and fragmented, with settings distributed across multiple dashboards. This complexity might increase advertisers' reliance on defaults, particularly for targeting, placements, and budget settings.

Overall, differences between business accounts and Ad Manager tools reflected how options were presented and navigated, rather than substantive differences in verification, review processes, or protections against fraudulent advertising.

## Insight #2

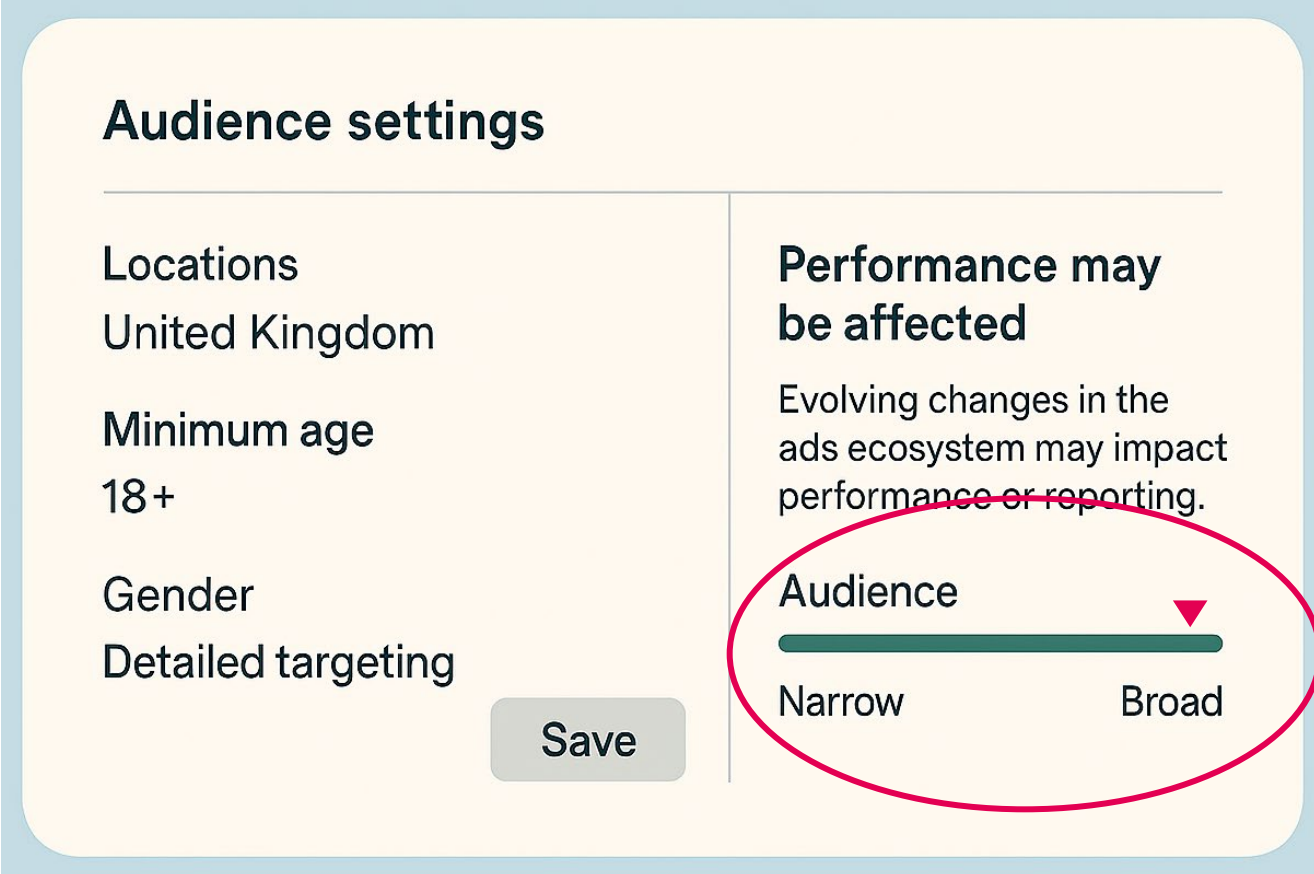
Ad creation interfaces were structured to prioritise reach and continued spend



# Audience reach was defaulted to broad

Ad creation interfaces were designed to get advertisers to reach as many people as possible. Most platforms presented an interface that appeared intuitive but had embedded defaults designed to maximise exposure.

These included pre-selected options for broad targeting and automatic placements, which might reduce advertiser control and increase the risk of fraudulent ads targeting a large number of users.



**Audience settings**

Locations  
United Kingdom

Minimum age  
18+

Gender  
Detailed targeting

Save

**Performance may be affected**

Evolving changes in the ads ecosystem may impact performance or reporting.

**Audience**

Narrow  Broad

The image shows a stylized representation of an ad targeting interface. It is divided into two main sections. The left section, titled 'Audience settings', lists four categories: 'Locations' (United Kingdom), 'Minimum age' (18+), 'Gender' (Detailed targeting), and a 'Save' button. The right section, titled 'Performance may be affected', contains a warning about evolving changes in the ads ecosystem. Below this is a section for 'Audience' targeting, which features a horizontal slider between 'Narrow' and 'Broad'. The 'Broad' option is selected, indicated by a red triangle and a red oval around the entire section.

Stylised version of the ad targeting options

# Audience targeting was granular and designed to maximise engagement

Audience targeting options were highly granular and could be used to reach vulnerable groups. Platforms allowed advertisers to target by age, location, interests, and behaviours, often suggesting “recommended” audiences that expand reach.

These recommendations/suggestions were primarily optimised for maximising impressions and views.

**Select the gender, age and parental status of your customers**

Gender	Age	Parental status
<input checked="" type="checkbox"/> Female	<input checked="" type="checkbox"/> 18-24	<input checked="" type="checkbox"/> Not a parent
<input checked="" type="checkbox"/> Male	<input checked="" type="checkbox"/> 25-34	<input checked="" type="checkbox"/> Parent
<input checked="" type="checkbox"/> Unknown	<input checked="" type="checkbox"/> 35-44	<input checked="" type="checkbox"/> Unknown
	<input checked="" type="checkbox"/> 45-54	
	<input checked="" type="checkbox"/> 55-64	
	<input checked="" type="checkbox"/> 65+	
	<input checked="" type="checkbox"/> Unknown	

Your ads can show to a specific set of potential customers who are likely to be within a particular age range, gender or parental status.

**Estimated weekly performance**

**49K – 150K Impressions**  
An impression is counted each time your ad is shown. The amount of impressions won't affect your cost.

**28K – 77K Views**  
A view is counted when someone shows interest and watches 30 seconds of your video ad (or the duration if it's shorter than 30 seconds) or interacts with the ad.

**Who should see your ad?**

**Special requirements**  
Review these if your ad is about financial products and services, employment, housing, social issues, elections or politics. ✓

**Suggested audience**  
Targets this ad to people similar to your followers

Locations: United Kingdom  
Gender: All  
Ages: 18+  
Interests: Optimized based on goals

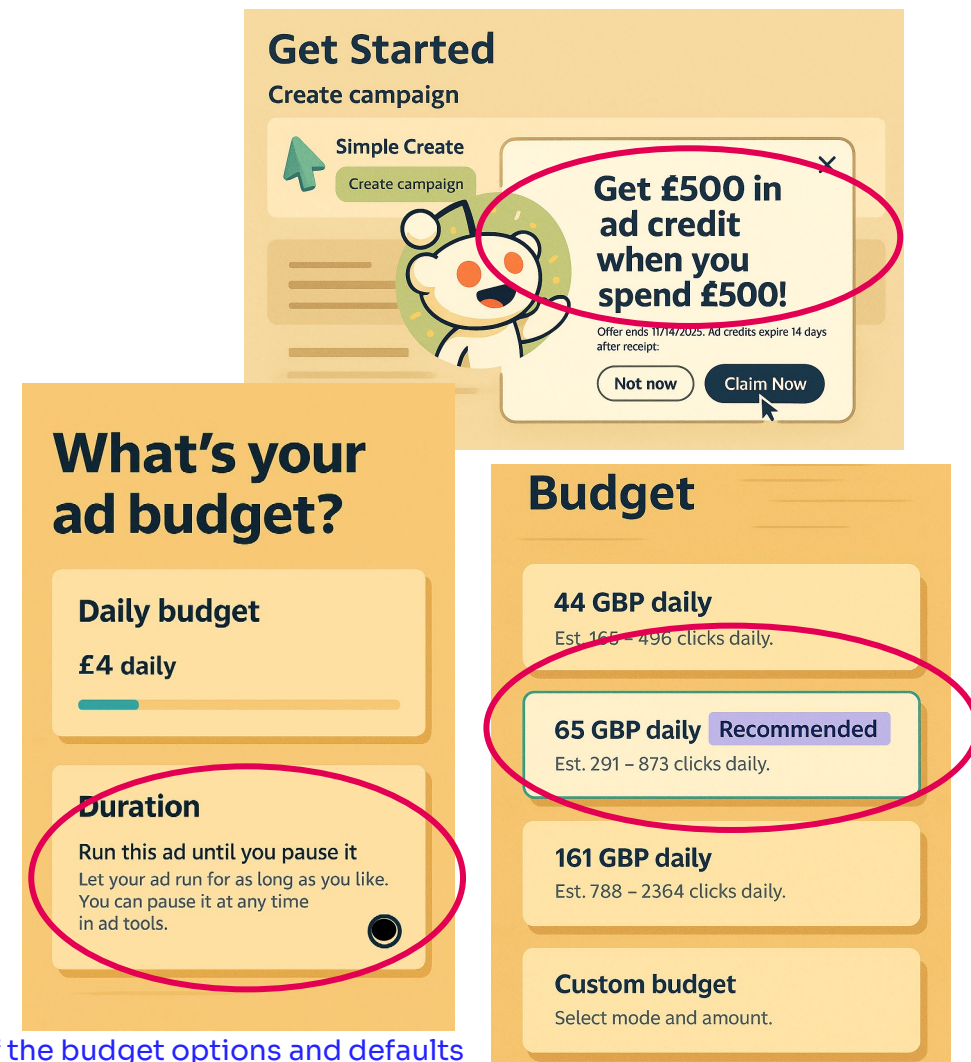
**Create your own**  
Enter your targeting options manually >

Stylised versions of the ad targeting options

# Defaults to spend higher and for longer

Budgets were pre-filled at particular levels. Defaults such as £25/day on [🔗] or £65/day on [🔗], alongside features such as “recommended budgets”, long durations, and ad credit offers, contributed to anchoring effects. While different options were available, these were less prominent. Such interface elements can influence advertisers’ spend choices.

The default spend per day ranged from **£25 to £65.**



Stylised versions of the budget options and defaults

# Use of GenAI to create ads

Generative AI was used/signposted in some platforms ([&#x2708] and [&#x2709]).

For example, [&#x2708] used it to automatically generate ad headlines, descriptions, and creative variations based on user intent, keywords, and historical performance data. It made the process much simpler and quicker to create ad assets and publish them.

The screenshot shows a web-based interface for creating ads. On the left, there's a form titled "Add images from your website" with fields for "Add images from your website" (with a URL input), "Headline" (with a placeholder "Write a compelling headline"), "Call to Action" (with a dropdown menu), "Destination URL" (with a URL input), and a "Resume" button. On the right, there's a preview of a mobile ad for "willExample Promoted" with the headline "Write a compelling headline" and the main text "Welcome to my blog!". A red oval highlights a signpost that says "Smart headlines powered by AI" with a subtext "AI-generated from your website. Advertisers are responsible for their ad." and a "Generate" button.

## Asset generation ✨

Let AI help you generate assets ✨

Where will people go when they click your ad?

Final URL

<https://www.example.com/user/MzkliiZYjM0vOJZ89>

What products or services are you advertising in this campaign?

Photo & Image Sharing

Social Networks & Online Communities

Online Photo &

Video Sharing

What makes your products or services unique?

Get ready to follow Julia on her amazing new journey! Be among the first to see the world through her lens. A vibrant visual diary is about to unfold.

Stylised versions of asset generation  
using AI tools

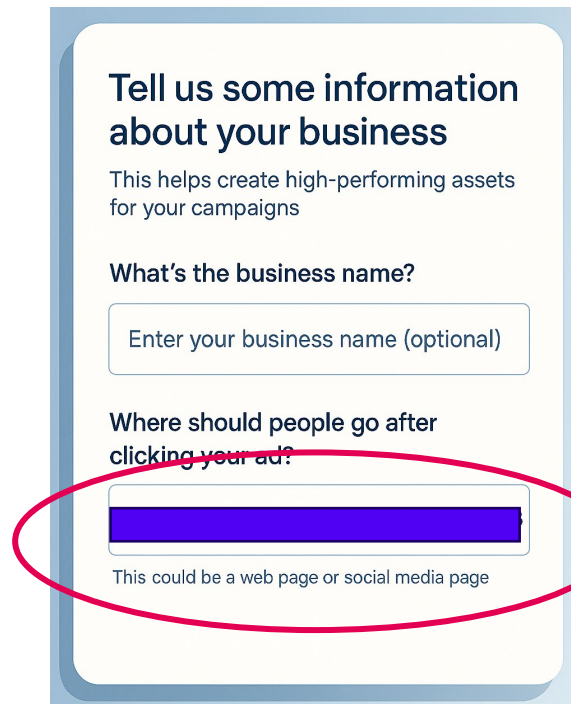
## Insight #3

Checks were limited, and external links were not vetted pre-publication



# Checks were limited in scope

The current ad creation workflow prioritised creative and campaign setup speed, with limited pre-publication review of external website links. There seemed to be no consistent or documented control to check the security, appropriateness, or ongoing validity of URLs prior to publication.



**Tell us some information about your business**

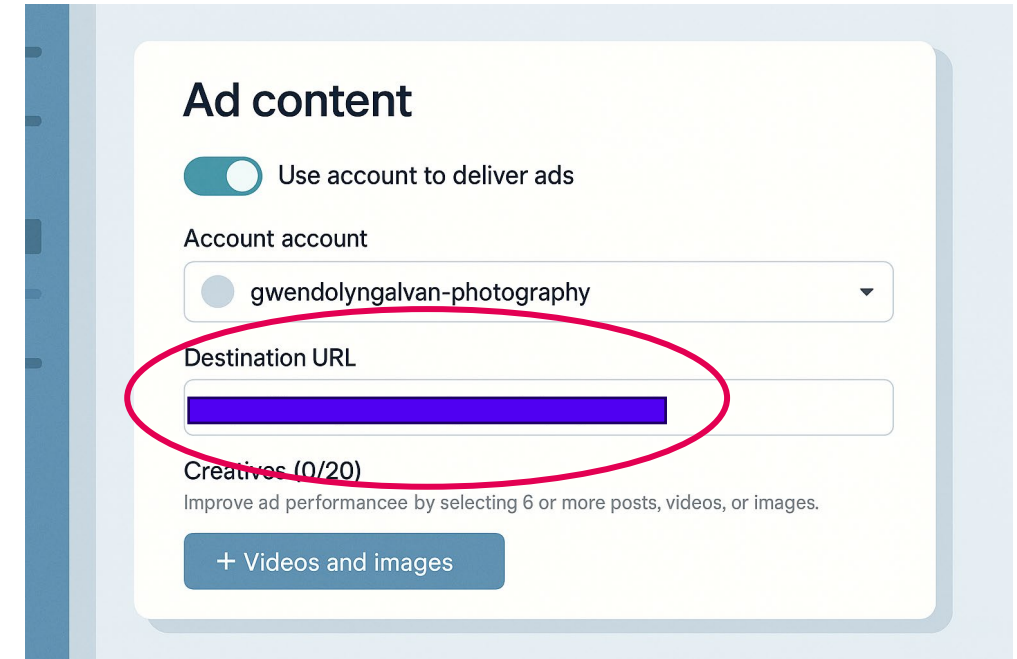
This helps create high-performing assets for your campaigns

What's the business name?

Enter your business name (optional)

Where should people go after clicking your ad?

This could be a web page or social media page



**Ad content**

Use account to deliver ads

Account account

gwendolyngalvan-photography

Destination URL

Creatives (0/20)

Improve ad performance by selecting 6 or more posts, videos, or images.

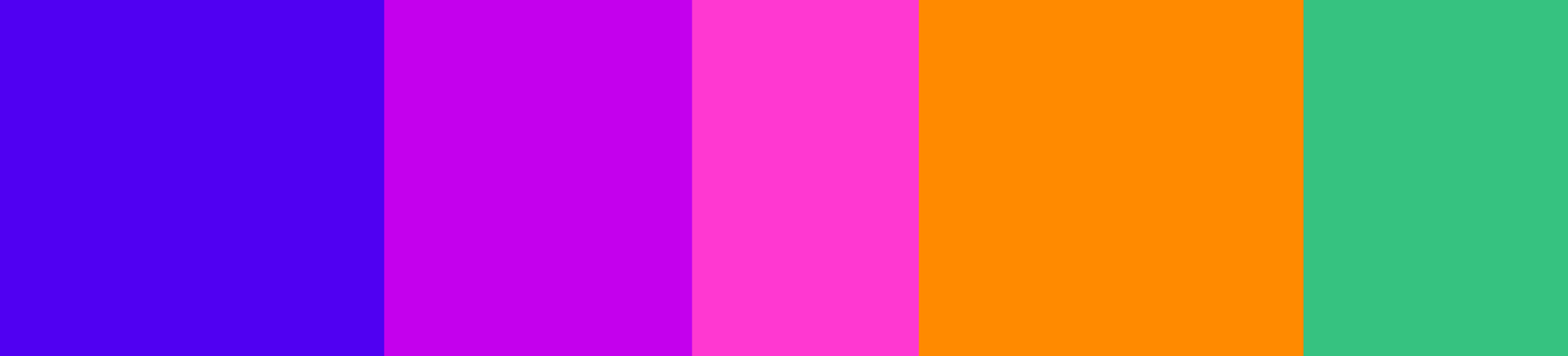
+ Videos and images

Stylised versions showing the 'external link option' when creating an ad

# Creating an Ad - Insights: Why these matter?

Insights	Potential Behavioural Impacts
<p>Ad Manager workflow was fairly standardised across platforms, but interfaces were complex.</p>	<p>Complex, visually dense workflows might increase cognitive load, so advertisers may rely more on defaults and recommendations, and miss safety checks.</p> <p>This can make it challenging for them to identify safeguards to secure their accounts, customise their settings, and locate advertising policies during the campaign setup process.</p>
<p>Ad creation interfaces were structured to prioritise reach and continued spend.</p>	<p>Recommended spend and personalised recommendations can steer advertisers toward higher reach/spend and longer campaigns, even when returns are unclear.</p> <p>This can amplify harmful or fraudulent ads quickly, especially where granular targeting can be used to reach vulnerable groups.</p>
<p>Checks were limited, and external links were not vetted pre-publication.</p>	<p>Limited checks and weak URL vetting might reduce deterrence of posting fraudulent advertising, as well as allowing advertisers to quickly upload and test ads.</p> <p>Bad-faith advertisers can start advertising without verifying their business and post suspicious links faster, raising user exposure to scam landing pages.</p>

# Findings: Reporting Mechanisms



# Insight #1

Length and complexity of the reporting process for ads varied across platforms



# Visibility and workflow complexity of reporting

Reporting tools for advertisements were typically located next to adverts. The majority of platforms ([X], [X], [X], and [X]) integrated reporting buttons behind icons (three dots or arrow), making them accessible and easy-to-use.

**6/7** platforms had a reporting function integrated into their system.

The number of reporting categories and subcategories ranged from **6-33.**

The number of clicks required to submit a report ranged from **3-6.**

**All** platforms, for which we were able to find and report an ad, had a category related to fraud, scams or misleading\*.

\* One platform ([X]) did not serve any ads during the audit.

## Insight #2

There was limited feedback on reporting outcomes



# Feedback, response timelines and Help Centre guidance

Immediate in-app acknowledgement of reports was common, but email confirmation and follow-ups occurred on only 3 of the selected platforms.

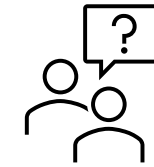
Response times were rarely disclosed upfront. They are only disclosed by the 3 platforms which followed up with an email.

**3-7**

**was the number of days platforms said “it would take them on average X days to review the report” when a timeline was disclosed.**

**7/7**

**platforms relied on automated processes with no direct human contact during the reporting workflow.**

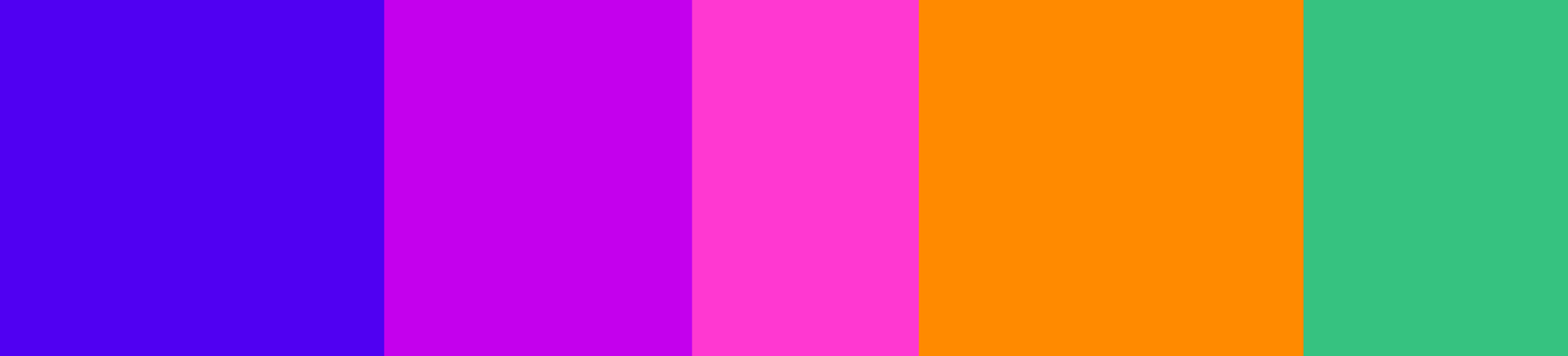


Help Centre guidance varied across platforms; some platforms offered guidance in reporting or how to detect fraudulent adverts, and some also offered information about platforms specific programmes (such as trusted flaggers). These articles were usually quite dense and time-consuming to read.

# Reporting Insights: Why these matter?

Insights	Potential Behavioural Impacts
<p>Length and complexity of the reporting process for ads varied across platforms.</p>	<p>Short reporting flows with clear categories may reduce frictions and choice overload.</p> <p>In the case of long, multi-step reporting flows, users may delay, abandon, or misclassify reports, leading to less user feedback and potentially allowing fraudulent ads to persist on the service longer.</p>
<p>There was limited feedback on reporting outcomes. Help Centre guidance for fraudulent advertisement existed in some services.</p>	<p>Lack of acknowledgement/feedback after report being submitted might undermine users' confidence that reporting leads to action. Over time, users may disengage from safety tools like reporting, meaning fewer potential issues are reported or fed back to services.</p> <p>Inconsistent, lengthy and ambiguous guidance about reporting or fraudulent activity might increase users' confusion and misinterpretation. They may follow incorrect steps or give up.</p>

# Findings: Account Takeover



## Insight #1

Reporting an account takeover involved multiple steps and was not consistently signposted



# Reporting an account takeover was complicated

The design of the platforms made it difficult for users to understand how to report both their own account takeover and an account takeover of someone else's account.

Reporting an account takeover was poorly signposted and was often hidden behind generic “Report a problem” flows. Users and advertisers needed to navigate Help Centres (often involving multiple steps) or complete a detailed form.

**7/7**

**platforms used a generic report or form to report own account takeover. These were often buried in the settings or Help Centre.**

**6/7**

**platforms used the same reporting mechanism for reporting another user's account takeover as for reporting adverts.**

## Insight #2

There was limited feedback on reporting outcomes for account takeovers



# Post-report actions for account takeover lacked consistency and transparency

Users and account holders did not consistently receive clear information confirming the successful submission of account takeover reports. While all platforms displayed confirmation messages at the point of submission, follow-up information varied. In some cases, no further updates were provided, timelines for review were unclear or not stated, and information on whether action had been taken was not always available.

Some platforms did not include additional links or signposting to relevant Help Centre resources.

All the platforms Help Centres provided guidance on how to identify account changes, report an account takeover, and secure user accounts. The guidance generally covered relevant topics and was presented in clear, straightforward language.

**7/7**

**platforms displayed confirmation messages upon account takeover report submission.**

**2/7**

**platforms mentioned timelines for resolution in their confirmation.**

## Insight #3

Safety features were inconsistently applied and required manual activation



# Key security changes and unusual login behaviour

Changes to key security settings were poorly flagged. Platforms rarely automatically notified account holders when passwords or contact details were changed. This means users need to manually turn on notifications (in-app or email) for changes to key security settings. This means any changes could be easily missed.

Similarly, the detection of unusual login behaviour was inconsistent. Visibility of information on recent login activity varied and was often buried under multiple layers in the settings. \*

**4/7**

**platforms prompted stronger security interventions when key security settings were changed.**

**The same platforms sent proactive alerts and prompts via email or in-app when there was a new login.**

\* This was performed by logging in from a different device, as well as using a VPN.

## Account takeover - Insights: Why these matter?

Insights	Potential Behavioural Impacts
<p>Reporting an account takeover involved multiple steps and was not consistently signposted.</p>	<p>Hidden, multi-step takeover reporting might increase friction at a high-stress moment, potentially resulting in inaction.</p> <p>This might lead to reduced timely reporting, longer activity time from the attacker, and possibly higher financial loss to the original account holder from ongoing ad spend.</p>
<p>There was limited feedback on reporting outcomes.</p>	<p>A lack of updates might create uncertainty and low perceived control, reducing persistence and follow-through.</p> <p>Users may stop pursuing account recovery, repeat actions inefficiently, or disengage from future reporting, allowing harms from account takeover, such as fraudulent ads, to continue.</p>
<p>Safety features were inconsistently applied and required manual activation.</p>	<p>Additional security settings were often off by default and required manual activation, with limited prompting or guidance.</p> <p>If users are not aware of weak default security settings, they may be less likely to notice early signs of account compromise or prioritise security. It might increase both the likelihood of undetected fraud and the risk of account takeover.</p>

# Summary of Key Audit Insights

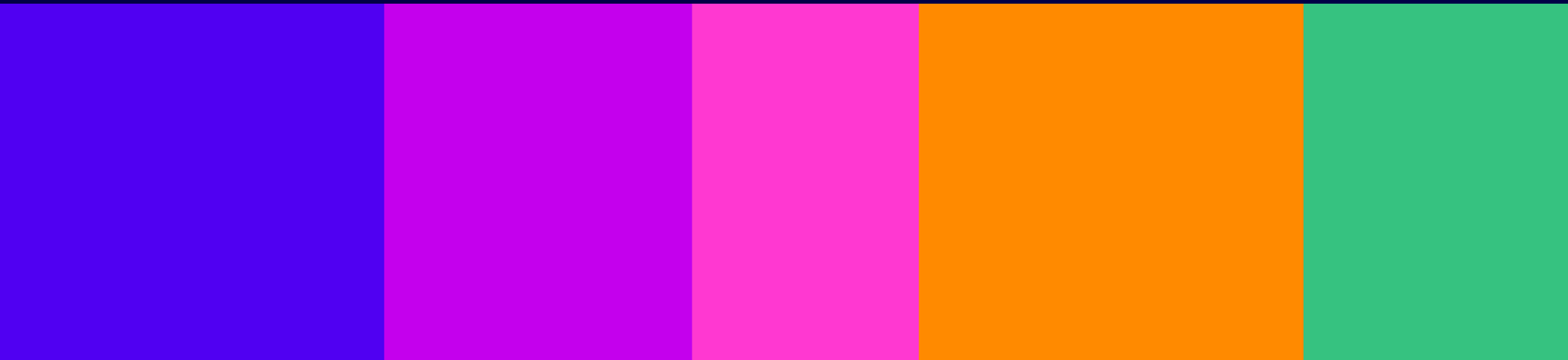
This research showed that platform design choices across the advertising lifecycle tend to prioritise helping advertisers upload and post ads efficiently with as wide a reach as possible. At the same time, some design elements may not be effective at preventing fraudulent advertising, particularly where safeguards are less prominent or introduced later in the process.

- Across the sign-up process, systems and processes seemed to prioritise speed and ease of use, often at the expense of verification, transparency, and early risk mitigation.
- Ad creation workflows seemed to be designed to increase reach, spend, and performance while making safeguards, policies, and content and credibility of ads less salient at key decision points.
- Advertisement reporting mechanisms, while present, were sometimes complex, and provided limited feedback.
- Account security and takeover responses relied heavily on user initiative, with weak default protections and unclear escalation routes.

These findings are useful for understanding the risks associated with advertising functionalities, particularly how platform design may contribute to the emergence and persistence of fraudulent advertisements. However, they only provide a snapshot of platform design and practices at a specific point in time and across a limited set of services and user journeys.

Findings therefore illustrate systemic design patterns rather than offering an exhaustive or definitive assessment of all platform practices.

# Annex



# List of OCA practices<sup>1</sup>

## Choice structure

- Defaults
- Ranking
- Partitioned pricing
- Bundling
- Choice overload and decoys
- Sludge
- Dark nudge
- Trick wording
- Visual interference
- Irreversibility
- Cooling off period
- Click-wrap agreements
- Comprehensive acceptance
- Sensory manipulation
- Forced action/outcomes
- Hidden options
- Tiered responses
- Nagging
- Asymmetric options
- Disguised ads

## Choice information

- Drip pricing
- Framing
- Prompts to reconsider
- Sneaking
- Comparison prevention
- Tool transparency
- Limited feedback
- Private feedback
- Intervention prompts
- Overwhelming options
- Lengthy text
- Complex text
- Ambiguous language
- Unclear repercussions
- Positively framed restrictions
- Ad labelling

## Choice pressure

- Commitment
- Prompts and reminders
- Notifications
- Fake scarcity
- Fake social proof
- Social accountability
- Social proof cues
- Countdown timers
- Fake urgency
- Personalisation
- Subscription traps

<sup>1</sup> Competition & Markets Authority. (2022). *Online Choice Architecture How digital design can harm competition and consumers*. [Available here](#)

# Online Choice Architecture (OCA): Choice structure

Platform's choice design	Definition	Behavioural biases involved
<b>Defaults</b>	A pre-defined setting that the consumer must take active steps to change.	Ease, Endorsement, Endowment
<b>Ranking</b>	Refers to the order of options in a particular way.	Ease, Endorsement, Saliency
<b>Partitioned pricing</b>	Sharing of the price components without sharing the total or estimated total costs with the consumer.	Complexity, Anchoring
<b>Bundling</b>	Groups two or more products and/or services in a single 'package' at a special price.	Complexity, Framing
<b>Choice overload or decoys</b>	Too many options are presented; additional option is added to make other option look less attractive.	Complexity, Saliency, Arousing emotions
<b>Sludge</b>	Excessive or unjustified friction that makes it difficult for consumers to get what they want or to do as they wish.	Present Bias, Complexity, Loss aversion, Friction Cost
<b>Dark nudge</b>	Removing friction for consumers to make inadvertent or ill-considered decisions.	Present Bias, Complexity, Loss aversion, Friction Cost, Arousing emotions, Ease

# Online Choice Architecture (OCA): Choice structure

Platform's choice design	Definition	Behavioural biases involved
<b>Trick wording</b>	The user is misled into taking an action, due to the presentation of confusing or misleading language.	Complexity, Framing
<b>Visual interference</b>	Information is hidden, obscure or disguised on the platform.	Complexity
<b>Irreversibility</b>	Irreversibility refers to actions that, once taken, are difficult or impossible to undo.	Empathy gap, Arousing emotions
<b>Cooling off period</b>	Intentional delays imposed before allowing users to undertake certain actions.	Empathy gap
<b>Click-wrap agreements</b>	Click-wrap agreements are user agreements where users must click an "agree" or "accept" button, often seeing only a brief summary of the terms.	Ease, Status quo bias, Saliency
<b>Comprehensive acceptance</b>	Designed to ensure that users view all necessary information before agreeing to terms.	Concretisation, Framing
<b>Sensory manipulation</b>	Employing visual, aural, and tactile features to steer consumers towards certain options.	Complexity, Saliency
<b>Forced actions/outcomes</b>	Changes the outcome without giving consumers a choice.	Ease, Commitment, Action bias

# Online Choice Architecture (OCA): Choice structure

Platform's choice design	Definition	Behavioural biases involved
<b>Hidden options</b>	Refer to choices or settings that are deliberately placed deeper within a user interface, making them less visible or more difficult to access compared to other options.	Complexity, Framing
<b>Tiered responses</b>	A structured set of options that allow users to respond to content, accounts, or conversations at varying levels of intensity.	Complexity, Framing, Endorsement
<b>Nagging</b>	Nagging is a form of adversarial resource depletion. The user tries to do something, but they are persistently interrupted by requests to do something else that may not be in their best interests, where they eventually might give in.	Empathy gap, Loss aversion, Present bias, Arousing emotions
<b>Asymmetric options</b>	Choice is presented in a manner that is unbalanced in options or information provided. For example, offering the options "Yes" and "Learn More" instead of "Yes" and "No" puts the burden on the customer to take extra steps to decline.	Complexity, Framing, Endorsement
<b>Disguised ads</b>	Deliberately blurring the line between actual content and advertising, increasing clickthrough rates.	Framing, Saliency, Cognitive overload

# Online Choice Architecture (OCA): Choice information

Platform's choice design	Definition	Behavioural biases involved
<b>Drip pricing</b>	Shows only part of the price and reveals the full price of the product or service at later stages of the consumer journey.	Loss aversion, Saliency, Anchoring, Endowment
<b>Framing</b>	The choice architect decides how any decision-related information is described or presented to a consumer.	Complexity/Ease
<b>Prompts to reconsider</b>	Encourage users to consider different behaviours or choices than the one they initially intended to make.	Empathy gap, Present bias, Arousing emotions, Social norms
<b>Sneaking</b>	The user is drawn into a transaction on false pretences, because pertinent information is hidden or delayed from being presented to them.	Complexity, Loss aversion, Endorsement
<b>Comparison prevention</b>	The user struggles to compare products because features and prices are combined in a complex manner.	Complexity, loss aversion, Present Bias
<b>Tool transparency</b>	Refers to how clearly a platform communicates the availability, functionality, and expected outcomes of its tools and features.	Saliency, Ambiguity aversion, Ease
<b>Limited feedback</b>	Refers to the absence of acknowledgment or follow-up information provided to users after they take certain actions on a platform.	Complexity, Endowment

# Online Choice Architecture (OCA): Choice information

Platform's choice design	Definition	Behavioural biases involved
<b>Private feedback</b>	Refers to actions taken by users that are visible to them but remain hidden from others on the platform.	Endowment effect, Commitment, Arousing emotions, Ego bias
<b>Intervention prompts</b>	Notifications or messages that encourage users to pause and reflect before proceeding with certain behaviours.	Empathy gap, Present bias, Social norms, Saliency
<b>Overwhelming options</b>	Large number of choices, each with subtle variations in functionality may be presented to users.	Complexity, Saliency
<b>Lengthy text</b>	Extensive written content without prioritising user comprehension.	Complexity, Present bias, Saliency
<b>Complex text</b>	Complicated language or technical terms may be hard for the average user to understand.	Complexity, Present bias, Saliency
<b>Ambiguous language</b>	Ambiguous language lacks clarity or precision, and can have multiple interpretations.	Complexity, Framing
<b>Unclear repercussions</b>	An insufficient explanation of the outcomes of specific user actions or behaviors.	Complexity, Friction cost
<b>Positively framed restrictions</b>	A strategic presentation of rules or limitations in a way that emphasises their benefits and underlying rationale.	Empathy gap, Concretisation, Social norms
<b>Ad labelling</b>	The failure to label paid-for search results as such, and “disguising” ads as something else to induce consumers to click on them.	Complexity, Framing

# Online Choice Architecture (OCA): Choice pressure

Platform's choice design	Definition	Behavioural biases involved
<b>Commitment</b>	Facilitates commitment by users to a particular behaviour in the future.	Anchoring, Arousing emotions, Social norms, Present bias, Endowment
<b>Prompts and reminders</b>	Contacts the user to induce an action and/or follow up on a previous interaction.	Present bias, Saliency
<b>Notifications</b>	An alert (typically a pop-up or other message) generated to notify users of something which has happened on the platform.	Present bias, Saliency, action bias
<b>Fake scarcity</b>	The user is pressured into completing an action because they are presented with a fake indication of limited supply or popularity.	Complexity, Loss aversion
<b>Fake social proof</b>	The user is misled into believing a product is more popular or credible than it really is, because they were shown fake reviews, testimonials, or activity messages.	Complexity, Social Norms, Loss aversion
<b>Social accountability</b>	Refers to the practice of reminding users of the visibility of, or possible impact of their actions on their social network.	Social Norms, Arousing emotions
<b>Social proof cues</b>	Signals that indicate the popularity or widespread acceptance of certain actions or content.	Social Norms

# Online Choice Architecture (OCA): Choice pressure

Platform's choice design	Definition	Behavioural biases involved
<b>Countdown timers</b>	Time-limited prompts that restrict the amount of time a user has to complete a specific action.	Present bias, Loss aversion, Saliency
<b>Fake urgency</b>	The user is pressured into completing an action because they are presented with a fake time limitation.	Present bias, Loss aversion, Social norms
<b>Personalisation</b>	The choice architect uses data to personalise offers.	Endowment, Anchoring, Mere Exposure effect, Saliency
<b>Subscription traps</b>	The choice architect designs significant conditions likely to affect a consumer's decision to participate in the promotion. Those are likely to include: whether a paid subscription starts automatically (after the trial) unless cancelled; the extent of the financial commitment if the subscription is not cancelled (during the trial).	Present bias, Loss aversion, Complexity