

# IAB UK response to DCMS Review of the Gambling Act 2005 Call for Evidence

25 March 2021

## Background

IAB UK is the trade association for digital advertising, made up of over 1,200 of the UK's leading media owners, advertising technology providers, agencies and brands. We have a [Board](#) comprised of 25 leading businesses in the sector. Our purpose is to build a sustainable future for digital advertising, a market that was worth £15.69bn in the UK in 2019.

The IAB is actively engaged in working towards the optimal policy and regulatory environment to support a sustainable future for digital advertising. We also develop and promote good practice to ensure a responsible medium.

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The questions in the Government's call for evidence do not relate specifically to digital advertising. However, following direct engagement with DCMS officials, the IAB is aware that Government is keen to receive any information relating to gambling advertising online. Much of the data sought – on campaign impressions, audience exposure or specific ad tech used in gambling ad campaigns – may be able to be obtained from the advertisers themselves (in this case the gambling operators), with the help of the agencies they use to plan and manage their ad campaigns, and/or third-party service providers who specialise in advertising measurement. While the IAB holds no specific data on digital gambling advertising, we are keen to provide any relevant information we have available to us and are therefore submitting the general evidence below by way of response.

## **Q15: Is there any additional evidence in this area the government should consider, including in relation to particularly vulnerable groups?**

### **How compliance is managed in online advertising**

Advertisers have a range of tools available to them when running campaigns online, which utilise data, insights and age targeting or inference tools to direct their advertising towards their targeted audiences and away from other audiences, including children or other vulnerable groups.

Methods used include creating detailed target groups; using content verification providers to exclude content sites and keywords that appeal to children or other vulnerable groups; using inclusion and exclusion lists; using data verification providers such as ComScore DCE or Nielsen DAR to cross-reference targets against audience profiles; delivering campaigns to logged-in users only; and carrying out verification (of where ads are being shown) during and after campaigns.

Brands running campaigns for age-restricted advertising (including gambling ads) may opt to advertise via direct relationships with publishers and other media owners, or only advertise in logged-in environments to ensure the requisite controls are in place.

There is no single safety net online for ensuring age-restricted ads are targeted away from children or other vulnerable groups; instead, a multifaceted approach is in place whereby processes and checks, both technological and human, are available at every stage of the digital advertising supply chain to target these ads towards the chosen audience – and away from children or other vulnerable groups.

All organisations involved in the digital advertising supply chain have every financial incentive for the targeting techniques being used to be as effective as possible. While no method, in any media, can achieve 100% efficacy in terms of ensuring ads are only seen by their targeted audience, the combined use of the tools and controls provided to manage ad placement online is an effective and reliable way to exclude children or other vulnerable groups from seeing age-restricted ads with a high degree of confidence, and has involved significant investment across the value chain.

In their [joint response](#) to the Government's recent consultation on plans to introduce a total ban of online HFSS advertising, IAB UK, ISBA and the IPA included the following information as Appendix D which sets out a summary of the available methods of targeting digital adverts away from children that exist at each stage of the digital advertising supply chain. While this summary relates to targeting ad campaigns away from children specifically, it may be useful in providing an overview of the multifaceted approach that exists for digital advertisers to target away from any audience segment they wish to minimise their ads being exposed to.

***Available methods of targeting digital adverts away from children, at each stage of the digital advertising supply chain***

*Advertisers are keen to comply with existing advertising regulations, fully aware that they will be held ultimately liable for any non-compliance by the regulator. They are therefore clear in highlighting any age-restricted ad campaign must be targeted away from children when dealing with their agencies, trade desks or directly with publishers or platforms. Regular advertisers of age-restricted products will often approach agencies with their own recommendations for how to best reach their target audience and how to avoid their ads being served to children.*

*Agencies and trade desks work closely with Demand Side Platforms (DSPs) to ensure ad campaigns are targeted effectively to reach their desired audience. Agencies gain a thorough understanding of their clients' needs and products being advertised, including whether or not age-restricted advertising is required to target the product away from children. Agencies routinely highlight available options to target away from children using DSPs or content verification tools, and recommend or require the use of these options when setting up an age-restricted campaign for their clients. These options typically err on the side of caution; targeting users aged 18 or above when regulations require avoiding users under the age of 16, for instance.*

*Agencies also offer inclusion lists to their advertiser clients, made up of publishers that have been specifically categorised as not containing content intended for child audiences. These lists are collated using data from content verification tools, but are subject to ongoing optimisation, with the publishers on the list being constantly updated.*

**Demand side platforms (DSPs)** provide advertisers the ability to target specific audience segments when setting up an ad campaign, and a campaign can be set up to either specifically target or exclude these audience segments.

DSPs have processes and tools in place for brands/agencies/trading desks to follow if/when they are setting up campaigns with age-restricted ads. Additionally, the DSPs have account managers who provide human support to aid advertisers' compliance with advertising rules.

The data DSPs use for targeting can be drawn from first party data (collected directly by publishers or advertisers themselves, including things like a user's purchase history or logged-in data), or third party data supplied by a Data Management Platform (or 'DMP' which collects and aggregates user data from multiple websites, and makes it available for targeting through DSPs). This can include using industry standard data sources such as Comscore CVE or Nielsen DAR. Advertisers are also able to supplement this with whitelists and blocklists to select supply that also helps direct HFSS ads away from children.

DSPs integrate **content verification tools** to help determine the subject matter of website content, allowing advertisers to avoid serving their ads next to inappropriate content. This process enables advertisers with age-restricted adverts to avoid serving them on websites that can be identified as appealing to children. As part of this process, the content verification providers can identify websites that are carrying content aimed at children, categorise them as such, and provide inclusion lists which exclude them to DSPs that the content verification providers are integrating with. This allows the advertiser, through the DSP, to only bid for advertising impressions on websites that have not been identified as appealing to children. Publishers can choose to block either specific brands, or categories of brands (e.g. 'alcohol'), from advertising on their websites. A publisher that hosts content appealing primarily to children might thereby choose to block all alcohol advertising, for example. Publishers routinely use these capabilities to prevent adverts for competitor publishers appearing on their sites.

**Owned and operated media** environments operate very differently, with different platforms having different processes for targeting away from children, and most operating with logged-in users that have declared their age when signing up. However, most provide clear guidance on which settings to select in order to avoid targeting children through their platforms. For instance, Facebook provides free online learning tools called [Blueprint](#), where marketers and agencies can learn how to select audiences and target their advertising etc (including specific guidance for [alcohol ads](#)), and Google provides clear [guidance for advertisers](#) on content exclusions and site category options in its ad management Help Centre. **Content verification tools** that specialise in analysing owned and operated media are also available on the market, providing advertisers with additional checks that their advertising is not being placed alongside content that appeals to children.