



The 100 Children Report

Monitoring age-restricted ads served to children on social media and online

Follow-up Report on Engagement with Advertisers, Agencies and Platforms

1. Summary

- 1.1 This report meets the ASA's public commitment to follow-up on some key findings of ['The 100 Children Report'](#) ('the Report'), which we published in November 2022. The Report provided real-world insights into children's exposure, via mobile phone and tablet devices, to ads for alcohol, gambling and other age-restricted ads online.
- 1.2 The Report called into question anecdotal views that children are being "bombarded" with age-restricted ads online. For example, whilst the figures are not directly comparable owing to significant differences in methodology, the Report found that, on average, each child on our panel (aged 11-17) was served 3.7 online ads for alcohol and gambling over the monitored week, compared to 3.0 TV ads (the average weekly exposure for children aged 4-15) for the same products.
- 1.3 However, in line with the ASA's legitimate regulatory objective to appropriately limit children's exposure to these ads and reduce exposure wherever practicable, and our zero tolerance to age-restricted ads appearing in children's media, we committed to exploring further with advertisers, agencies and platforms the steps taken to serve these ads to adult audiences and away from child audiences. In particular, we were concerned to know whether CAP Guidance on Targeting Age-restricted Ads Online¹ had been followed by advertisers and agencies. The Guidance sets out steps prior to, during and post ad campaigns to ensure marketers are doing everything they can to limit children's exposure to these ads.
- 1.4 This report reflects positively on our post-Report engagement with advertisers, agencies and platforms and the purposeful steps that marketers are taking to help limit children's exposure to these ads. It also invites ASA reflections on the research and questions whether aspects of the research might be undertaken differently in any subsequent and related research we commission. And, this report clarifies why, on this occasion, we consider it is not appropriate to highlight the identity of advertisers whose ads were

¹ <https://www.asa.org.uk/news/new-guidance-on-targeting-age-restricted-ads-online.html>

identified in The 100 Children Report as, on the face of it, being in breach of the UK Advertising Code².

- 1.5 The findings of The 100 Children Report³ and the Technical Report⁴ detailing the methodology used can be found on the ASA website.

2. **Background**

- 2.1 In November 2022, the ASA published 'The 100 Children Report', which provides real-world insights into UK children's mobile phone and tablet use, the platforms and sites they visit and, of particular importance to this report, the ads they are exposed to.
- 2.2 Of the 11,424 online ads that the 97 children in our study were exposed to over the course of the monitored week, 435 (3.8%)⁵ related to ads for alcohol, gambling and other age-restricted ads.
- 2.3 Depending on their media placement and audience targeting, age-restricted ads can be subject to a ban under the UK Advertising Code⁶. The legitimate aim of the ban is to appropriately limit children's exposure to ads for products that they cannot legally purchase or, in the case of ads for high fat, salt or sugar food and drink products, have the potential to adversely influence their dietary preferences. The ban is not absolute and allows advertisers to target age-restricted ads to adults in media where they comprise 75% or more of the audience.
- 2.4 On publication of the report, we undertook to bring to advertisers', agencies', and platforms' attention the occasions when age-restricted ads were delivered to children participating in the study. This included when the child was registered on the social media account with a date of birth that signified they were of a child's age (13-17) or, clearly falsely, of an adult's age (18+). Our objective was to form a better understanding of marketers' practices in limiting children's exposure to these ads and the extent to which CAP Guidance on Targeting Age-restricted Ads Online is being followed. This report now meets

² The UK Code of Non-broadcast Advertising, and Direct & Promotional Marketing:

<https://www.asa.org.uk/codes-and-rulings/advertising-codes.html>

³ ASA: The 100 Children Report (2022): <https://www.asa.org.uk/static/afd01271-2865-41b7-ab2dbe3c92d46200/The-100-Children-Report.pdf>

⁴ ASA/Kantar: The 100 Children Report – Technical Report (2022): <https://www.asa.org.uk/static/a728af74-e7cd-4092-bcaf5852bc5216e8/The-100-Children-Report-Kantar-Technical-Report.pdf>

⁵ Ad exposure data is based on our panel of 97 children and should not be interpreted as representative of all children.

⁶ The UK Code of Non-broadcast Advertising, and Direct & Promotional Marketing: <https://www.asa.org.uk/codes-and-rulings/advertising-codes.html>

our public commitment to communicate the follow-up enquiries we made, the information we received in response, the lessons we learned to support our future monitoring online and the enforcement decisions we made.

3. Post-publication Action

Category One

- 3.1 We prioritised engagement with 30 advertisers, in some cases their agencies, and YouTube and Meta about the 73 occasions when an age-restricted ad was delivered to children in apparent clearcut breaches of the Code. These apparent clearcut breaches included age-restricted ads being delivered to the social media accounts of nine children on our panel who *reported* their registered age as 17 or younger (giving them a child age account profile). The Code and the ASA has a zero-tolerance approach to age-restricted ads being delivered to such accounts.
- 3.2 These cases amounted to 0.6% of the total number of occasions when an ad was delivered to the 97 children on our panel.
- 3.3 The majority of these ads were for gambling companies (37 ads relating to 10 advertisers) and alcohol products (31 ads relating to 16 advertisers).
- 3.4 We wrote to the advertisers highlighting their particular ad, the date on which it was identified by our monitoring and the circumstances in which we considered the ad was likely to have breached the Code. In the face of the apparent clearcut breach, we required (and received in every case) a written assurance that the advertiser would review their processes and procedures, including with relevant third parties, to ensure their ads were not being served to the social media accounts of children whose registered date of birth identify them as being 17 or younger. We also asked for an explanation as to how they considered the apparent clearcut breach may have occurred and the steps they took to appropriately target the ad.

Category Two

- 3.5 We also followed up with 65 advertisers about the 261 occasions when an age-restricted ad was served to children on our panel, including via the social media accounts of the 25 children who *reported* their age as 18+ (falsely giving them an adult age account profile).

- 3.6 On the face it, these 261 occasions, comprising 2.3% of the total number of ads delivered to the panel, do not amount to a breach of the Code because the ad has been served to someone who is nominally of adult age. However, even in these circumstances, the ASA still expects advertisers to use a range of audience and media targeting tools to limit children's exposure to these ads, for example, by using 'interest' based selections to target ads to audiences with interests typically associated with adults (e.g. golf or gardening) and away from audiences with interests typically associated with children (e.g. fashion or music that is directed at and/or is likely to be of particular appeal to them).
- 3.7 Given this expectation, we wrote to the 65 advertisers highlighting their particular ad and the date on which it was identified by our monitoring. We noted that, whilst, on the face of it, the ad was unlikely to have breached the targeting rules, the ASA expects advertisers and their agencies to use available targeting tools to help serve their age-restricted ads to adults and away from these nominally adult social media accounts. CAP Guidance on Targeting Age-restricted Ads Online⁷ stipulates that, owing to social media users' false age registrations, advertisers cannot rely entirely on age data alone to exclude children from the audience. We advised Category One and Category Two advertisers to adhere to the Guidance and to view a [webinar](#)⁸ that we created to further support compliance with the Code's relevant restrictions on media placement and audience targeting for age-restricted ads online.
- 3.8 A notable finding of The 100 Children Report, which we consider of value to repeat again here, is that - as a likely consequence of registering with false dates of birth on social media - children who reported they were registered as 18 or older were exposed to 47% of all the age-restricted ads captured in our study, almost two-thirds *more* than children who reported they were registered as 17 or younger (29%). For this and other reasons, the ASA supports industry and regulatory efforts to design proportionate and effective age verification systems and, separately, adult and child media literacy programmes to better socialise the risks of false age registration.

Meta and YouTube

- 3.9 We engaged Meta and YouTube about both categories of age-restricted ads, with a heavy focus on Category One ads. These ads were delivered to nine logged-in social media accounts (five on YouTube and four on Meta), which, as reported by the child account holders, were registered with a date of birth that signified they were 17 or younger (giving them a child age account profile). We asked for an explanation as to how the platforms considered these apparent clearcut breaches of the UK Advertising Code had occurred

⁷ <https://www.asa.org.uk/resource/advertising-guidance-age-restricted-ads-online.html>

⁸ <https://www.youtube.com/watch?v=DkcrwpiPUv4>

given the reasonable expectation that age-restricted ads should not, under any circumstances, be delivered to the social media accounts of children registered with a child's age profile.

- 3.10 The advertisers, agencies and social media platforms all engaged constructively with our enquiries.

4. Information from Advertisers and their Agencies

- 4.1 We were encouraged to see that all of the advertisers were able to provide us with detailed information indicating that they and/or their agencies had taken a range of measures, generally in line with the CAP guidance⁹, to limit children's exposure to their age-restricted ads. This included taking measures to exclude their ads from the social media accounts of children, whether or not the children are age-registered with a child's age or, falsely, with an adult's age. They also highlighted measures taken to exclude children's exposure to open display age-restricted ads outside of social media platforms. In line with CAP's guidance, these measures were generally put in place prior to, during and post the running of the ad campaign.
- 4.2 The evidence we received from advertisers indicated that they were employing multiple preventative and corrective measures including, but not restricted to:
- 4.3 Age restrictions: social media accounts of people under the age of 18 were expressly excluded from being targeted as part of ad campaigns; some advertisers widened the scope to also exclude people aged 18-24. Gambling operators informed us that, by virtue of being officially categorised on the platforms as a provider of gambling services, their advertising account configurations and campaign settings do not enable them to target users registered as 17 or younger.
- 4.4 Negative keywords: advertisers assign negative keywords (typically associated with topics popular with children) to their age-restricted ad campaigns to prevent their ads from being shown to children who use those keywords as 'search' terms. When someone searches under those negative keywords, the age-restricted ad should be automatically prevented from being shown to the search user.
- 4.5 Proactive exclusion of topics: in addition to the use of negative keyword exclusion lists, some advertisers also employ extensive audience profiling

⁹ <https://www.asa.org.uk/resource/advertising-guidance-age-restricted-ads-online.html>

(which include a combination of strategies, such as Audience, Contextual and Lookalike modelling based on converted users to the site, and also creating audience lists from non-converted users to deliver their retargeting campaigns), and seek to proactively exclude certain topics which might result in their ads being misdirected towards an under-age audience. For instance, some advertisers exclude advertising from content suitable for families, limiting their advertising to “standard content” that is less likely to be viewed by children.

- 4.6 Use of automated scripts: some advertisers use ‘scripts’ to automate actions in their advertising accounts in order to check the real-time configuration of their campaigns; in particular, to automatically identify if a campaign has been incorrectly configured without the appropriate age restrictions in place. If any such instances are uncovered, a campaign will be immediately and automatically paused, and the advertiser prompted to review and take any remedial action before any adverts are served.
- 4.7 Periodic reviews: some advertisers undertake weekly or monthly reviews of their search term reports, which indicate those search terms which resulted in particular ads being shown. The aim of such exercises is to identify any additional search terms which may have been keyed in by users which could potentially be associated with children and other vulnerable audiences. Where any such terms are identified, they are added to the advertisers’ negative keyword exclusion lists.
- 4.8 Maintaining detailed record keeping: the vast majority of advertisers keep thorough records of all their advertising campaigns including configuration settings and reach by age ranges.
- 4.9 We understood from our engagements that the vast majority of advertisers, or their agencies, had subsequently followed up with Meta or YouTube to better understand the factors that may have led to their age-restricted ads being delivered to the social media accounts of children who reported their age as 17 or younger.

5. Information from Meta and YouTube

- 5.1 Both Meta and YouTube highlighted the policies they have in place and the means available to advertisers and their agencies to support compliance with the Advertising Code’s media placement and audience targeting restrictions. Annex A includes related submissions from each platform and, additionally, the broad steps they take to identify and correct false age-registration, in part to help mitigate the risks of children’s exposure to age-restricted ads (amongst other risks associated with false age registration).

- 5.2 Using information provided in The 100 Children Report and additional information, requested from and provided by the ASA, both platforms undertook internal investigations to explore the circumstances that might have led to age-restricted ads being delivered to the social media accounts of children who reported a registered age of 17 or younger.
- 5.3 In the ASA's view, both platforms engaged, and continue to engage, constructively with our line of regulatory enquiry. However, without being able to locate the actual Category One social media accounts monitored by Kantar, the independent research agency commissioned by the ASA to undertake the monitoring, the platforms' investigations are understandably constrained. The ASA itself has no means of locating these accounts and does not have knowledge of account holders, beyond knowing the anonymised children's actual age and their *reported* registered age on their social media accounts; information provided to the ASA by Kantar.
- 5.4 Both platforms have clarified that in circumstances where social media accounts are, in fact, registered with a date of birth that signifies the account holder is 17 or younger, the platforms' policies and technology would, in all conceivable circumstances, prevent an age-restricted ad from being delivered to these accounts. Not unreasonably, both platforms highlighted the possibility that, notwithstanding the multiple steps that Kantar had taken to ensure the children's self-reported registered age was accurate¹⁰, there remained the possibility that the information provided by the nine children was inaccurate and the relevant Meta and YouTube accounts were, in fact, age-registered as 18 or older. Annex B sets out information that helps to substantiate our confidence in the accuracy of the account registration ages that were reported to us by children participating in the study.

6. ASA Reflections, Enforcement Decisions and Next Steps

- 6.1 The information provided to the ASA by advertisers, agencies and platforms demonstrate the seriousness, care and multiple ways in which each realise their responsibility to appropriately limit children's exposure to age-restricted ads. For the avoidance of doubt, the Codes do not require, and the ASA does not expect that children should not see *any* age-restricted ads online, on TV, via outdoor advertising or any other media where adults comprise at least 75% of the audience.

¹⁰ See p.8 (*Getting to the Truth*) and p.25-26 (*Appendix D*): <https://www.asa.org.uk/static/a728af74-e7cd-4092-bcaf5852bc5216e8/The-100-Children-Report-Kantar-Technical-Report.pdf>
See p.87 (*How did you collect registered date of birth details?*):
<https://www.asa.org.uk/static/afd01271-2865-41b7-ab2dbe3c92d46200/The-100-Children-Report.pdf>

- 6.2 In all cases, the stakeholders were supportive of the proactive approach being taken by the ASA and its legitimate regulatory objective to appropriately limit children's exposure to age-restricted ads, to reduce exposure wherever practicable, and to pursue a zero-tolerance approach to age-restricted ads appearing in children's media.

ASA Reflections

- 6.3 In terms of the bigger picture, the findings of The 100 Children Report found that ads for alcohol, gambling and other age-restricted ads made up a relatively small percentage (3.8%)¹¹ of the ads seen by the 97 children on our monitoring panel.
- 6.4 Measuring exposure: The ASA welcomes the steps being taken by advertisers and their agencies, and social media platforms, to limit and reduce further children's exposure to age-restricted ads online, including by addressing the challenges posed by false age registrations (giving children an adult age profile on social media).
- 6.5 We consider that these steps, which are multiple and material, are having an effect on limiting children's exposure to these ads i.e. without such steps, children's exposure to age-restricted ads online would very likely be significantly greater. But, without having the data sets to compare adults' exposure to age-restricted ads over the same monitored week, we cannot comment with authority on the extent to which children's exposure has been limited by the preventative steps being taken by marketers.
- 6.6 As set out in this [article](#)¹² in 2022, while we are able to use industry-standard data to regularly measure children's exposure (audience exposure) to ads on TV, there is no comparative, industry-standard data for children's exposure (audience exposure) to ads online. In the absence of robust, industry-standard online audience data for under-15s, the ASA has focused instead on contracting with third party providers, employing the software and technology they provide, to proactively identify age-restricted ads that, in breach of the advertising rules, are placed in children's media online, including being served to children's social media accounts. The 100 Children Report does provide valuable insights into children's exposure to online advertising within social media and on websites more generally. But the costs, limitations and practicalities of running such exposure monitoring reporting on a repeated and long-term basis are currently prohibitive. The ASA therefore maintains an active interest in ongoing efforts to provide cross-industry-standard data to measure audience exposure to online ads.

¹¹ Ad exposure data is based on our panel of 97 children and should not be interpreted as representative of all children.

¹² <https://www.asa.org.uk/news/measuring-exposure-a-research-perspective.html>

- 6.7 Children's privacy and safety: In all fields of research involving people, especially children, it is necessary to have the highest regard for privacy and safety issues. As data collection underpinning the 100 Children Report involved the use of metering software downloaded to the mobile devices of children in order to capture ads served to them through their own logged-in social media accounts, we and our research partner, Kantar, were correctly concerned to strictly uphold the privacy and safety of the children participating in the research. We will not compromise on our responsibilities to these ends.
- 6.8 The ASA and Kantar continue to have confidence in the general integrity and accuracy of the account age-registration details reported to us by the children on our panel (see Annex B). However, we cannot be *absolutely* confident that the ages (13-17) submitted for each of the nine social media accounts relating to Category One are accurate. We cannot, therefore, be *absolutely* confident that the Category One ads amount to indisputable, clearcut breaches of the Code. This reflection has obvious implications for our enforcement decisions and, potentially, future research methodology.

ASA Enforcement Decisions

- 6.9 In circumstances where the ASA suspects, but does not have indisputable evidence that an advertiser has breached the Advertising Code, we can reverse the burden of proof, inviting advertisers and, in some cases, the parties they contract with, to demonstrate how they have complied with the Code's relevant restrictions.
- 6.10 Given the information presented in the sub-section above, we cannot be absolutely confident that age-restricted ads (identified in the Category One sub-section of this report) were, in fact, sent to social media accounts of children registered with a child's age profile (17 or younger). As the registered-age profile of the account holder is, therefore, disputable and there are no means for the advertiser, agency or platform to locate the nine social media accounts in question, we cannot fairly reverse the burden of proof on this occasion. The ASA has therefore taken the decision to not publish the identities of the 30 advertisers behind the age-restricted ads that were sent to these accounts.

Next Steps

- 6.11 The ASA has a continuing commitment to use in-house data science and contracts with tech providers and research companies to proactively monitor online advertising, to gather intelligence about compliance with the UK Advertising Code and take regulatory actions as necessary. Whilst complaints submitted to the ASA remain an important source of intelligence to inform our

regulation, the ASA considers self-initiated, proactive projects such as The 100 Children Report best enable us, and our sister digital regulators, to effectively identify and tackle detriment online.

- 6.12 The ASA considers The 100 Children Report provided a ground-breaking, real-world insight into children's exposure to age-restricted ads online accessed via children's mobile and tablet devices. Our post-Report engagement with advertisers, their agencies and platforms, together with our own reflections on the methodology, invite us to consider what changes we might make should we commission a follow-up or related piece of research.
- 6.13 For example, how might the ASA better assess the effectiveness of the multiple and material steps taken by advertisers and their agencies to appropriately limit children's exposure to age-restricted ads online, especially when compared to the exposure of a legitimate adult audience?
- 6.14 And, how – within the constraints of the privacy and safety imperatives we are committed to upholding – might the ASA help itself, advertisers, agencies and platforms to fully investigate findings, if any, that strongly indicate an age-restricted ad has, in fact, been sent to the social media account of children who are registered with a child's age (17 or younger) in breach of the UK Advertising Code?
- 6.15 Finally, the ASA is committed to contributing our insights, including from The 100 Children Report, to support ongoing child safety initiatives around age-verification measures, especially given the Report's finding that – as a likely consequence of registering with false dates of birth on social media – children registered as 18 or older were exposed to 47% of all the age-restricted ads captured in our study, almost two-thirds *more* than children registered as 17 or younger (29%). We recognise there is more work to do on effective age-verification measures, and the ASA will continue to work with advertisers, agencies and platforms to ensure children are protected online.

Annex A Platform Submissions

The ASA requested and received the following submissions from Meta and Google outlining the policies they have in place and the means they make available to advertisers and their agencies to support compliance with the Advertising Codes' media placement and audience targeting restrictions. This includes the broad steps each platform takes to identify and correct false age-registration, in part to help mitigate the risks of children's exposure to age-restricted ads (amongst other risks associated with false age registration).

Submission from Meta:

How Meta approaches age assurance

Providing [age-appropriate](#) experiences for the billions of people who use our services around the world is an important element of what we do. Understanding how old someone is underpins these efforts, but it's not an easy task. Finding new and better ways to understand people's ages online is an industry wide challenge. We believe an effective way of addressing this problem is for devices or app stores to provide apps with people's ages, allowing teens to be placed in age-appropriate experiences across all the apps they use. In the absence of industry standards or regulation on how to effectively verify age online, we've invested in a combination of technologies that are more equitable, provide more options to verify age and that protect the privacy of people using our technologies.

For large-scale companies like Meta, with billions of people around the world using our services, we need a scalable way to understand what it looks like when the age someone provides us doesn't match their actual age.

We've made a number of design changes across our services to make it more challenging for people to give us an inaccurate age at sign up. For instance, we don't have a default age at or above the minimum required age to access our services. We've added additional barriers to the registration flow that prevent minors from editing the initial birth date that they enter. Users are also prevented from attempting to register more than twice in a single session, whereby those two attempts will lead to a waiting period before they can try again.

For many years now we have also provided tools to report underage users. Reporting can be done anonymously and regardless of whether you are on Facebook or not. We have broadened our efforts so that, regardless of why an account has been reported to us, if we find that user is under age we will remove them; and, our advertising tools build on these foundational steps.

[Artificial intelligence \(AI\)](#) is one of the best tools we have to help us tackle these types of challenges at scale. We invest heavily in research and technology to better understand people's ages across our platforms and have developed an adult classifier — an AI model we've developed to help detect whether someone is a teen or an adult.

The job of our adult classifier is to help determine whether someone is an adult (18 and over) or a teen (13–17). When people first sign up to use our services, we ask them to enter their birth date. But people aren't always accurate (or honest), and we've seen in practice that misrepresenting age is a common problem across the industry.

To develop our adult classifier, we first train an AI model on signals such as profile information, like when a person's account was created and interactions with other profiles and content. For example, people in the same age group tend to interact similarly with certain types of content. From those signals, the model learns to make calculations about whether someone is an adult or a teen.

Our adult classifier has significantly improved our ability to provide age-appropriate experiences to the people who use our services, but there is room to improve on this work. We are continuously testing new types of signals that might improve our ability to detect whether someone is a teen or adult. For example, we are testing AI models that use natural language processing to help determine whether a user is an adult or a teen based on writing styles common to adults or teens.

Last year we also began testing [new options for people on Instagram to verify their age](#). In partnership with Yoti, a company that specialises in online age verification, we have been offering users the ability to upload their ID or record a video selfie to prove their age. Our goal is to expand the use of this technology more widely.

Understanding someone's age online is a complex, industry-wide challenge. We want to work with others in our industry, and with governments, to set clear standards for age verification online. Many people, such as teens, don't always have access to the forms of ID that make age verification clear and simple. As an industry, we have to explore novel ways to approach the dilemma of verifying someone's age when they don't have an ID.

Submission from Google:

YouTube Ads

A vast network of ad policies work together to prevent age sensitive ad categories from serving to young users on YouTube. These include:

- The Google Ads Policies (including the [Alcohol](#), [Gambling](#) and [Sexual content](#) policies), applicable to all advertisers. These require advertisers to comply with local law and regulation and control where ads for these categories are displayed.
- YouTube's [kids ads policies](#). These restrict certain types of advertising from being shown to YouTube supervised experience accounts, accounts self-declared as under 18, users our systems indicate may be under 18, and alongside content declared by a creator as "made for kids" content.

- The [YouTube Kids app ads policy](#), applicable in the YouTube Kids app, which prohibits sensitive categories of ads for a young audience.
- The [Default Ads Treatment policy](#), which prohibits sensitive ad categories (including adult content, alcohol, gambling) from serving to users that aren't signed in.

Google - advertiser targeting controls for video campaigns

Google provides advertisers with a lot of control over the audiences they reach, which includes the ability to avoid showing ads in specific circumstances. In addition there are default controls within the system which prevent the targeting of under 18s, specifically the absence of targeting options for under-18s or for Made for Kids content.

The following controls can be used to define specific groups an advertiser wants to avoid.

- Demographic controls: advertisers can choose to disable targeting of users whose age is unknown and target only users who fall into one of the available age categories: 18 - 24, 25 - 34, 35 - 44, 45 - 54, 55 - 64, 65+.
- Interests: advertisers can exclude users with defined interests or intentions (as estimated by Google) from the audience of their ads.
- Content: advertisers can specify which websites, apps, YouTube channels, YouTube videos and app categories they want to avoid.
- Keywords and topics: advertisers can list keywords and topics they want to avoid.
- Advertisers can identify their ads as ineligible to show alongside Made for Kids content.

Google - Age Assurance

Knowing an accurate age for a user can be an important element in providing age-appropriate experiences and protections. That said, determining age across multiple products and surfaces, while at the same time respecting user privacy and ensuring that our services remain accessible, is a complex technical challenge. For users in the UK, we employ a variety of age assurance methods:

- We require users to provide their date of birth during account creation, and apply protections when a user declares, or we otherwise determine, that they are under 18.
- Additionally, we don't allow children under the digital age of consent to create a standard YouTube account. Users identified as such are directed to our supervised experiences account creation flow where a parent or guardian can consent to create and supervise their child's account.
- We also utilize a model to help us infer if a user is over or under the age of 18 based on a variety of behavioral signals, such as the products they're using, the types of sites a user is searching for, the categories of videos that they have watched on YouTube, and the longevity of an account. Ads policies apply as indicated during and after inference.
- Users also have the option to [verify their age](#) using a government ID or a credit card.

When a user declares they are under 18 or if we determine the user to be under 18 using our age assurance methods, default protections will be applied to the account to help keep them safer online.

Annex B Confidence in the accuracy of account registration details

Full details of the methodology used in ‘The 100 Children Report’ can be found in our [research report](#) (including Annex 1: Monitoring Phase FAQs) and the accompanying [Technical Report](#).

Given the objectives of the study, forming a confident understanding of the registered dates of birth on participants’ social media accounts was a crucial element of the panel set-up. As part of the recruitment process, we asked panellists to provide details of the date of birth registered with each of the social media platforms (in alphabetical order: Facebook, Instagram, Twitter and YouTube¹³) they had their own accounts with.

Due to data privacy concerns around the collection of detailed personal data of under-18s, we did not seek to record any photographic evidence of profile pages to corroborate the information provided by the panellist. The data was ultimately self-reported and, as with any research study, we were reliant on participants providing truthful and accurate information.

Taking into consideration the privacy and safety of the research participants, we undertook a number of steps to ensure collection of robust account registration details.

- **Step-by-step instructions:** As set out in the Technical Report, rather than inviting the participants to rely on recall, we shared both written and visual instructions to take respondents through a step-by-step process, for each of the four social media platforms, to locate their registered date of birth information.
- **Clear assurances on anonymity:** To elicit accurate responses from participants, particularly those who may not have wished to admit they held accounts with a false date of birth, Kantar framed the survey questions in a way that was designed, and would be likely, to encourage open and honest responses. The following is an extract from the recruitment survey:

For our results to give us a true picture of the ads that children see online, we are asking you to be honest with us about the age you are registered as on each social media platform you use.

We know that platforms often have age restrictions in place, but lots of people give false ages to create an account. You won’t get into any trouble if you’ve said you’re older than you are (and remember all the data shared with the ASA will be anonymous), but it might just help us to understand why children are seeing the ads they’re seeing.

¹³ As set out in detail in our report, at the time of conducting the study, it was not possible to capture ads served in TikTok, Snapchat or Twitch using the available metering tool.

We explicitly reassured participants, throughout the recruitment process, that there would be no ramifications for telling us about incorrectly registered accounts and that all data was anonymised.

- **Response options:** Perhaps most importantly, the question capturing registered age data presented a number of alternative response options for those participants who may have been concerned about sharing details of an incorrectly registered account or if they did not want to follow the step-by-step guidance to locate their profile data. Participants were asked to enter the registered date of birth or presented with the following three options:
 - No date of birth is registered
 - Don't know
 - Prefer not to say

Eighty (38%) of the 208 social media accounts held by panellists, recorded one of these three options, meaning we did not have registered date of birth details for these accounts. This demonstrates that participants preferred to respond with one of these responses rather than *incorrectly* telling us they are registered as under-18 or with a false date of birth indicating that they are between 13-17 years old.

We collected details for a total of 208 social media accounts held by the 97 panellists, across the four monitored platforms. Based on responses given by the participants:

- 93 of the 208 accounts (45%) were registered as under-18 (either with the correct date of birth or an incorrect date of birth that indicates the child is under-18).
- 35 accounts were registered as over-18 - suggesting that, perhaps as a result of the steps taken, many of the panellists were unconcerned about informing us that they had registered a false date of birth on one or more accounts.
- Seven children provided registered age details that showed that they had one or more accounts registered with their correct date of birth and at least one account registered with a date of birth making them over-18.

These responses demonstrate the openness with which participants were willing to respond to this part of the recruitment process.