



The Conscious Advertising Network, Policy Roadmap 2026

Summary: Regulate Platform & AI Business Models to Protect Information Integrity & Children's Rights

The platform and generative AI business models of monetising attention at any cost are harming individuals; degrading information integrity at an alarming rate and destroying the trust in the industry, which is essential to effective advertising.

Digital advertising is the [\\$1tn industry](#) that underpins the economic model for our information environment and the financial incentives that define what is produced, distributed and amplified online. When combined with the incentives of revenue chasing generative AI companies and social media platforms, it is contributing to the monetisation of attention in ways which are causing harm and cannot be ignored.

Driving transparency through this vast financial market is essential for the commercial success of British and European businesses, including leadership in AI; the maintenance of information integrity and the safety of children on platforms and AI tools.

Context:

Despite prolonged attempts by the advertising industry and platforms, self-regulation of digital advertising and platforms has failed.

Regulating this complex system requires taking on three characteristics: Scale, Opacity and Attention.

- **Scale:** The scale at which attention is monetised is staggering. In 2025, the global advertising spend was an estimated [\\$1.14 trillion](#) and accounts for the majority of platform revenue. Simply put, advertising is the core business of digital technology companies.
- **Opacity:** The digital advertising system is hugely opaque, with large numbers of intermediaries. Independent regulation and legislation to drive transparency through media buying will be key in rewiring the incentive structures for harmful and illegal content, reducing the [\\$114 billion ad fraud](#) losses, and allowing businesses access to the data they need to ensure effective advertising placement.



- **Attention:** Digital platforms act as distribution systems for content and in return, users are shown ads. The larger the number of ads that can be shown, the more profit made by the platform. Consequently, the architecture of these platforms is engineered to maximise screen time at all costs. The platforms themselves describe this as a '[topic agnostic](#)' approach to monetising attention which means that suicide and self-harm content is often treated the same as cat videos by their algorithms. This must be stopped.

Why regulate?

The patterns described above have created serious harm. For example:

- 'Made for advertising' sites and the [Southport riots](#)
- Monetised climate disinformation and the economic impact of the [Valencia floods](#)
- [Suicide content](#) aimed at under 16s, and monetisation, as well as [AI chatbots](#) driving children to suicide
- [Child sexual abuse material](#) monetised by major brands
- [Scams](#) becoming a [significant proportion](#) of revenue for platforms

The result is a degradation of the quality of our information systems. As the UN points out:

"Information integrity is foundational to functioning democracies, stable economies, and effective responses to global challenges from climate change to public health crises. The integrity of the global information ecosystem is at a crisis point and Artificial Intelligence (AI) is accelerating the breakdown." Charlotte Scaddan, Senior Adviser on Information Integrity, United Nations

The rapid uptake of artificial intelligence tools by business and the advertising industry is exacerbating these issues and displaying a worrying number of the same patterns. From the sharp fall in advertising revenue available to reputable news sources caused by generative AI and AI search summaries, to the democratisation of the production of deepfakes, to AI being implicated in the suicides of children and young people.

Advertisers who demand transparency in media placement report strong improvements in [return on ad spend](#) and fraud reduction, essential to ensuring the competitiveness of UK and European businesses in the medium term.

We need new legislation now to join the dots and drive transparency through the digital advertising system. Existing legislation and regulation contains loopholes that



technology companies are able to exploit, which harms advertisers and society. We must address the root cause of these problems: the business model of the platforms, and now the AI companies which grab our attention in order to monetise it in the future.

Recommendations:

The Conscious Advertising Network's recommendations for policy makers have 4 central pillars:

Enshrine protection of information integrity in law	Align with the recommendations in The UN Global Principles on Information Integrity and the Global Declaration on Information Integrity on Climate Change. Define and recognise information integrity within digital regulation frameworks, and require platforms, advertising systems, and AI services to identify, assess, and mitigate systemic risks arising from the monetisation and amplification of harmful or misleading content-while upholding freedom of expression. This includes ensuring transparency and accountability for how advertising and AI systems shape information environments.
Drive transparency through the digital advertising ecosystem	Ensure end-to-end transparency and accountability across the digital advertising supply chain, enabling advertisers to verify where their ads are placed, what content they fund, and how media-buying decisions are made. Platforms and intermediaries should be required to provide object-level transparency - at the level of individual content placements - and clear disclosure of the systems, including AI-driven tools, that determine ad delivery. This is necessary to enable informed decision-making, safeguard information integrity, and ensure that advertising spend does not inadvertently fund illegal or harmful content.
Stronger accountability mechanisms	Establish enforceable accountability mechanisms that ensure platforms and intermediaries are



	financially and operationally accountable for the monetisation of harmful or illegal content, including proportionate penalties tied to harm and revenue.
Ensure business models rewards citizens and business	Align platform and advertising business models with societal interests by reducing incentives to monetise harmful content, enforcing data minimisation in targeting, and ensuring fair value distribution across the digital ecosystem.

The Conscious Advertising Network

[The Conscious Advertising Network](#) has been operating since 2017. We have over 200 members from the advertising and NGO communities who welcome regulation that helps them to ensure that effective advertising works for everyone.

This document has been designed to be used in conjunction with others, such as policy asks from [Check My Ads](#), [Climate Action Against Disinformation](#), and [The Molly Rose Foundation](#). We leverage our unique position as a membership organisation to complement and enrich existing policy directions through partnerships.

The asks in detail

1. Enshrine protection of information integrity in law:

The ask	Align with the recommendations in The UN Global Principles on Information Integrity and the Global Declaration on Information Integrity on Climate Change. Define and recognise information integrity digital regulation frameworks, and require platforms, advertising systems, and AI services to identify, assess, and mitigate systemic risks arising from the monetisation and amplification of harmful or misleading content-while upholding freedom of expression.
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	This includes ensuring transparency and accountability for how advertising and AI systems shape information environments.
In the UK	The UK should adopt a definition of information integrity as defined by the UN in its Principles to Practice issue brief by amending Schedule 7 of the OSA to add a new category: "algorithmic amplification of content that degrades information integrity." This must be consulted on to ensure it is appropriate and protects freedom of expression, but should contain the key elements outlined in this document. We agree with the findings of the UK House of Commons' Social media, misinformation and harmful algorithms report. <i>"The government should establish comprehensive guidelines for all actors within the digital advertising ecosystem and supply chain. These should be informed by the UN's 2024 Guiding Principles for Information Integrity and developed in consultation with civil society, academics, experts, industry and policymakers. It should be designed to remove incentives for algorithmic acceleration of harmful or misleading content whilst upholding freedom of expression; ensure advertisers can avoid harmful content; and ensure transparency in technologies with public safety implications, such as digital advertising."</i> Expand Ofcom's risk assessment guidance to explicitly include: "risks to information integrity" monetisation-driven amplification dynamics. Ofcom should update its Codes of Practice to introduce a cross-cutting "information integrity" risk category and require platforms to: • Assess how ad systems and recommender systems amplify harmful content • Implement mitigation measures Ofcom, the Advertising Standards Authority and the ICO should work together to establish comprehensive guidelines for all actors within the digital advertising ecosystem and supply chain. These should be developed in consultation with civil society, academics, experts, industry and policymakers. Guidance should be designed to explain:

	• Information integrity and the roles that each of the actors identified by the UN play in ensuring its protection. • How each actor is expected to tackle incentives for algorithmic acceleration of harmful or misleading content whilst upholding freedom of expression. • Why transparency in technologies with public safety implications, such as digital advertising and AI, is vital. Ofcom should also update guidance to include climate disinformation and fossil fuel misrepresentation as an explicit example of systemic risk in Ofcom guidance, linking it to public safety and civic process harms. Deceptive AI-ads should not be able to masquerade as human created, in order to curb the spread of disinformation. We propose extending upcoming UK AI regulatory frameworks to adopt a labelling duty for UK platforms.
In the EU	The EU should adopt the statutory definition of information integrity as defined by the UN in its Principles to Practice issue brief under the EU's DSA systemic risk assessment & mitigation, embed via interpretation and enforcement priorities and follow the recommendations above. The DSA should also recognise climate disinformation and fossil fuel related misrepresentation as systemic risks arising from the dissemination and monetisation of verifiably misleading environmental claims, given its documented impact on public policy, disaster response, and public understanding of scientific consensus. Update the DSA's existing ad transparency obligations to add a requirement that disclosures include whether the ad's creative was AI-generated.

2. Drive transparency through the digital advertising ecosystem:



The ask	Ensure end-to-end transparency and accountability across the digital advertising supply chain, enabling advertisers to verify where their ads are placed, what content they fund, and how media-buying decisions are made. Platforms and intermediaries should be required to provide object-level transparency - at the level of individual content placements - and clear disclosure of the systems, including AI-driven tools, that determine ad delivery. This is necessary to enable informed decision-making, safeguard information integrity, and ensure that advertising spend does not inadvertently fund illegal or harmful content.
In the UK	We agree with the findings of the UK House of Commons' Social media, misinformation and harmful algorithms report: <i>“The internet, and social media, could not operate without digital advertising. There needs to be heightened transparency in the market processes of online advertising. Given its implications for public safety... Government should mandate ‘Know Your Customer’ checks for participants in the programmatic advertising supply chain, as exists in other large markets. The government should also ensure that platforms disclose full ad campaign data, and allow independent third-party audits and vetting of ad exchange supply partners.”</i> Transparency should be thought of as a tool to allow advertisers to control their spend, rather than a reporting tool. If an impression cannot be traced to a specific post, feed, creator, or AI response, it should not be legal to monetise it. To achieve this, transparency must operate at object level. The OSA and Data Use and Access Bills should be updated in order to: • Require platforms and intermediaries (via Ofcom codes) to: ○ Provide meaningful ad placement transparency ○ Demonstrate how monetisation interacts with harmful content risk Under DMCCA 2024: • Use SMS (Strategic Market Status) powers to:



	○ mandate fair and transparent ad supply chain practices ○ Require data access for advertisers ○ Conduct Competition & Markets Authority (CMA) market investigations into AdTech opacity Under financial regulations, the DMCCA, the OSA: • Mandate ‘Know Your Customer’ checks for participants in the programmatic advertising supply chain, to bring it in line with other large markets, as recommended by Check My Ads, and in order to protect against scams and trafficking as outlined by the UN report on the trafficking of scam workers. • Introduce Best Interests Duty for all AdTech intermediaries and verification vendors who work on behalf of advertiser and publisher clients and advertiser clients must be entitled to refunds when vendors fail to meet agreed-upon standards, as recommended by Check My Ads. • With the rise of autonomous agents making media buys, advertisers must have access to meaningful data logs for every decision, not just the final placement. Industry definition of ‘meaningful transparency’: Platforms disclose full ad campaign data. Every monetised impression must resolve to a discrete, auditable object. Deterministic placement logs are essential. Sampling, proxies, or post hoc summaries are insufficient. Advertisers must be able to reconcile spend directly to the exact posts, feeds, creators, and AI outputs that carried their ads. At a minimum, advertisers should receive, for each impression: • A unique object identifier for the post, share, video, short, feed unit, group placement, hashtag instance, or AI generated response. • Clear declaration of object type, whether human generated, creator assisted, AI generated, or AI summarised. • A canonical reference or URL enabling independent verification.
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	• The surface on which the ad appeared, such as feed, reel, group, search, or AI answer. • The beneficiary of monetisation, whether creator, publisher, group owner, platform, or AI system. • Timestamp, geography, advertiser ID, and campaign ID. • Full supply path disclosure. For every unit of spend, there should be a clear accounting of how value is distributed across the platform, auction mechanics, intermediaries, creators, groups, and AI systems. This must be provided at impression level, not as aggregated or modelled averages. • Reach, attention, viewability and credible uplift signals. Newsfeeds require special attention and methods to ensure user privacy is protected. Online platforms must offer users of its services the option to choose a feed which is not based on profiling. Data on where ads are served on personalised feeds should be available to advertisers showing: • The specific content objects ads appeared next to (post ID, creator ID, hashtag, monetised status). • Whether that content generated revenue for the creator or platform. • Aggregated audience data (age band, region, etc.) AI surfaces require explicit treatment. Any monetised AI aided or AI generated output must disclose: • What the response was, including all elements, from text to image, sound or video generation. • Whether the response was monetised. • Which advertisers funded it. • Whether paid content influenced ranking, summarisation, or generation. • Provenance of the content: who/what created it, whether it's been altered, and whether it passed the platform's own safety thresholds. • Contextual snapshots at the moment the ad served: showing the exact AI output the ad sat beside while also protecting user privacy.
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	• Audit trails so brands can reconstruct incidents quickly if something goes wrong. Transparency of risks of advertising on platforms: The UK's Online Safety Act should be updated to increase the level of responsibility of platforms for the content on their platforms, protect advertiser freedoms to make informed decisions about cost and tackle the business model of the attention economy by: • Flagging Made for Advertising (MFA) status clearly before buys take place. • Publishing their risk profiles to advertisers and regulators in line with and exceeding the EU's DSA transparency requirements, including: ○ Analysis of systemic risks the platform poses. ○ Specific measures taken to mitigate these identified risks and the success rate of those measures. ○ Use or otherwise of privacy respecting age verification technology and number of incidences where underage children are found to be circumventing these measures. ○ Content Moderation Data including: ■ Numbers of content removals, account suspensions, and other enforcement actions. ■ Breakdown by content categories (hate speech, disinformation, etc.) ■ Response times for handling reports. ■ Appeals data and outcomes. ○ Monetisation Data including: ■ Clear criteria on how monetisation decisions are made and associated risks. ■ Prevalence of monetised harmful content found and effectiveness of brand safety tools. ■ How much money is being made by creators and how much of ad spend by individual companies is going to each creator.
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	■ Algorithmic systems information including: • High-level descriptions of main algorithmic systems used for content recommendation and ranking, such as AI driven search functions. • How these systems might contribute to systemic risks. • Measures to increase algorithmic transparency. • Data on Recommender Systems including: ○ Information about how content recommendation algorithms work. ○ Options provided to users for algorithmic choice. ○ Parameters users can modify. • Advertising Placement Transparency: ○ Transparency data of log and placement as described above. ○ Data on targeted advertising practices. ○ Information about political advertising (if applicable). ○ Ad repository and targeting criteria. ○ Prevalence of advertising appearing in high risk¹ and low transparency environments such as newsfeeds. ○ Crisis Response Measures ■ Actions taken during crisis situations that might affect public security or health. ■ External Auditing. ○ Results from independent audits of risk assessments and mitigation measures.
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¹ High risk defined similarly to in the EU AI Act. Severity of potential harm: Could exposure to harmful content in these spaces cause substantial physical, psychological, or economic damage?

Impact on fundamental rights: Is there a high incidence of discrimination, or privacy violation in this digital environment?

Vulnerable populations: Does it affect children, marginalised groups, or people in precarious situations?

	○ Independent third-party audits and vetting of ad exchange supply partners must be allowed. Transparency and usability of ad libraries: Ensure platform ad libraries are: • Transparent, accessible, searchable and fit for purpose. • Comprehensive across all adverts placed or shown. • Include ads with creators, including in content promotions. • Requirements should be extended to all AdTech vendors, not simply the largest. Transparency of AI decision making: Ensure the upcoming UK AI Regulation Bill has a clause around “Commercial Advertising Transparency: Providers of AI-driven advertising services shall, on request, furnish the advertiser with meaningful explanations of automated decision-making aligned with GDPR, unless exempted on grounds of trade-secret protection, in which case a summary of the logical steps must be supplied.”
In the EU	Extend the EU’s Digital Services Act articles in line with the above. Strengthen by requiring: • Standardisation of reporting formats. • Enforcement against insufficient granularity. • That it applies to AdTech platforms. Extend the EU’s Digital Markets Act pricing and performance transparency through Commission enforcement decisions in line with the above. Amend the AI Act to include explainability appropriate to risk.

3. Stronger accountability mechanisms:

The ask	Establish enforceable accountability mechanisms that ensure platforms and intermediaries are financially and operationally accountable for the monetisation of harmful or illegal content, including proportionate penalties tied to harm and revenue.
In the UK	We agree with the findings of the UK House of Commons' Social media, misinformation and harmful algorithms report: <i>“There are insufficient disincentives for bad practice in the digital advertising market. Bad actors can exploit the ecosystem, monetising harmful content through major platforms... Ofcom should be empowered to give penalty notices to platforms when they allow harmful content to be monetised through their services. These penalties should be based on a formula that considers: the severity of harm, the amount of revenue the publisher received, the amount of revenue the platform received, and the number of individuals that encountered the harmful content. The revenue generated from these penalties should be used to support victims of online harms.”</i> Ofcom should use its enforcement powers in the advertising sector and it should produce guidance to cover: • Monetised harm pathways through any digital means, rather than limiting itself to specific technologies or sectors. Penalty calibration should include: • Revenue generated from harmful content • Scale of exposure Expand scope via interpretation, to include AI-generated content services where they meet OSA “user-to-user” or “search” definitions. Ofcom, ICO, and CMA should negotiate a Digital Regulation Cooperation MOU with the European Commission, modelled on the UK-EU Trade and Cooperation Agreement's competition cooperation provisions. On the EU side, involve the EDPB, European Commission DG CNECT, national DSA competent authorities.
In the EU	As above.

	Extend the EU's Digital Services Act risk and fines in line with the above. Include monetisation of harmful content as a risk multiplier and enforcement priority Treat climate disinformation and fossil fuel misrepresentation as a persistent systemic risk, not limited to crisis mechanisms.
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4. Ensure business models respect citizens and reward business:

The ask	Align platform and advertising business models with societal interests by reducing incentives to monetise harmful content, enforcing data minimisation in targeting, and ensuring fair value distribution across the digital ecosystem.
In the UK	The OSA should be updated and extended. • Expand the definition of Platform to include AdTech, generative AI tools and AI search summaries. • Require transparent revenue sharing disclosures for AI generated search summaries and generative AI tools in line with the DMA. • Mandate the sharing of advertising revenue generated by AI aided search summaries and generative AI tools to the sources used to generate these summaries. Extend the OSA (emergency powers for crisis response) to: • Regulate social media monetisation of organic content during declared public-interest crises (e.g., natural disasters, pandemics) to prevent the monetisation of dangerous disinformation. • During declared public-interest crises (e.g., natural disasters, pandemics), enforce a 'no-monetisation of misinformation' rule: any ad campaign that references the crisis must pass a rapid-review by an independent fact-checking body before delivery. To prevent abuse, this should be:

	- o A formal Ofcom determination, not a government declaration. - o A defined list of qualifying crisis categories (public health emergencies under the Civil Contingencies Act, Level 3+ COBR activations). - o A 72-hour automatic sunset with renewable 7-day extensions, each requiring fresh Ofcom determination. - o A statutory right of platform challenge before the Competition Appeal Tribunal on fast-track. We agree with the findings of the UK House of Commons' Social media, misinformation and harmful algorithms report: <i>“We welcome Ofcom’s consultation on a ‘crisis response protocol’ for companies to follow in response to events such as the 2024 unrest. The protocol should directly address misinformation by including all online services at risk of contributing to the spread of false or harmful information, including large online social media, search and messaging services; those with smaller user numbers but high-risk profiles; and others, such as generative AI platforms. In establishing the mechanism, Ofcom should acknowledge the different ways in which different services operate. It should hold platforms responsible for: decelerating the spread of harmful misinformation without censoring lawful speech; ensuring substantial and continuous engagement with law enforcement and government bodies; giving users control over the content they see; and providing transparency around their actions.”</i> The GDPR and OSA already cover data-minimisation and transparency. We propose ICO issues sector-specific guidance for Platform, AdTech and AI to strengthen the consumer right to object. Stating that: - ‘For the purpose of targeted advertising, controllers shall process no more than the data elements strictly necessary to achieve the advertised outcome.’ - Defines permissible data categories, consent granularity, and audit requirements.
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	AI companies should pay for the IP they leverage to ensure the future of the creative industries and the UK's Copyright, Designs and Patents Act 1988 should be updated. Ensure that the UK leads the world in responsible AI. Currently, when companies replace workers with AI, the workers bear the entire cost. Introduce measures to support workers, such as a surcharge on the existing Finance Act 2020 DST for large-scale AI deployments. Ensuring that those who profit from automation pay their fair share to support the people they replace.
In the EU	As above. Data minimisation: • Enforced via General Data Protection Regulation • Complemented by: ○ ePrivacy Directive (and future regulation) Business model constraints: • Via Digital Services Act: ○ Systemic risk mitigation obligations Gatekeepers: • Via Digital Markets Act: ○ Fairness in ad markets ○ Transparency obligations AI and content value: • Via copyright framework Climate and reporting: • Via existing: ○ Corporate sustainability frameworks

Glossary



AdTech: Short for advertising technology, refers to the software, tools, and systems used by advertisers, publishers, and agencies to buy, sell, manage, and analyse digital advertising campaigns. It encompasses the entire ecosystem of technologies that facilitate programmatic advertising, including real-time bidding (RTB), audience targeting, ad serving, and performance measurement across channels like search, display, video, mobile, and social media.

Best Interests Duty: Requires financial advisors and mortgage brokers to act solely in the best interests of their retail clients when providing personal advice or credit assistance. This duty mandates that providers place the client's interests ahead of their own and resolve any conflicts of interest in the consumer's favour. [Check My Ads](#) have created advertising industry specific definitions and applications, contact them for more details.

Information Integrity: An information ecosystem in which reliable and accurate information is available to all, enabling people to engage meaningfully in public life, make informed decisions and exercise their rights. This ecosystem is shaped by the actions of a diverse range of actors, including governments, technology companies, media, civil society and individuals. Strengthening information integrity means protecting the right to freedom of expression and access to information, ensuring inclusive access to a range of information sources and enabling people to navigate information spaces safely, with privacy and freedom. It involves building resilient societies that foster trust, knowledge and public empowerment. Challenges to information integrity encompasses a spectrum of risks, such as disinformation, hate speech, restrictions on press freedom and the malicious use of technologies.

Know Your Customer: A mandatory set of procedures that financial institutions and regulated companies must implement to verify the identity of their clients and assess the risks associated with their business relationships. This process is a core component of Anti-Money Laundering and Counter-Financing of Terrorism regulations, designed to prevent fraud, money laundering, and other financial crimes. Key legal obligations under KYC include:

- Identity Verification: Collecting and authenticating official documents to confirm a client's identity and address.
- Beneficial Ownership: Identifying and verifying the natural persons who ultimately own or control a legal entity.
- Risk Assessment: Evaluating the risk level of the client.



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- Continuous Monitoring: Maintaining an ongoing review of customer activity to detect suspicious behaviour or changes in risk profiles.