Letting Children be Children

Report of an Independent Review of the Commercialisation and Sexualisation of Childhood by **Reg Bailey**

Department for Education

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Contents

Appendices
(published separately at www.education.gov.uk)

1.   Parents' Voice Qualitative Research: executive summary

2.   Results from TNS Omnibus Survey of parents and children and young people

3.   Parents' Call for Evidence summary and questions

4.   Questions for industry and wider stakeholder Call for Evidence

Foreword by Reg Bailey

"I don't know why grown-ups find it so difficult, it's really very simple. There should be another button on the remote control like the red button so that if you see something that isn't right on television then you can press it to tell them you don't like it. And if more than a thousand people press it then the programme is automatically cut off". So said the enthusiastic 10-year-old at a research presentation from a group of children to the Review team. "It's really very simple."

When Sarah Teather MP, the Minister of State for Children and Families, approached me to lead an Independent Review of the Commercialisation and Sexualisation of Childhood I was delighted to be asked, but I was under no illusions that it was likely to be very simple.

Previous reviews of these issues have been led by eminent academics and practitioners. I am neither, but took on this task as someone who is passionately interested in supporting family life, not only through my job as Chief Executive of Mothers' Union, a charity supporting parents and children in 83 countries of the world, but also as a parent and grandparent.

We live in a society that is changing at what is, for many, a bewildering rate. Increased levels of wealth have created strong commercial pressures on every one of us, whether or not we have participated in that affluence. Society also seems to have become more openly sexualised; the rapidly changing technological environment has its benefits in so many ways but has also made the seamier side of humanity inescapable.

If adults need to be emotionally and otherwise well adjusted to deal with this environment; so much more so do children.

I wanted to understand the nature of these pressures on our children and young people. I wanted to understand, too, why so many parents seem to lack confidence in their ability to help their children navigate this commercial and sexualised world. Most of all I wanted to bring forward some clear and straightforward suggestions to address these issues and ensure we provide the right sort of support for parents and children alike.

So what would be a good outcome from this Review?

Firstly, that parents feel that I have listened to their concerns and that they will be taken seriously. Parents recognise that they should be the ones to set the standards that their children live by, but in some things they need more support. In particular, parents need businesses and others to work with them and not against them.

However, parents also need to accept the challenge to them and recognise that for children to be children, parents need to be parents.

Secondly, whilst many businesses and broadcasters are doing a good job in working with parents and only selling things for and to children that are appropriate for them, there are those who are not. I hope that they would recognise that they need to step up and be as good as the best, and they need to be more proactive in encouraging feedback and complaints. When it comes to inappropriate advertising and marketing, I want all businesses to play fair when selling to children and not take advantage of gaps in the regulation, especially regarding new media. It seems to me that there is enough goodwill for this to happen without legislation.

Thirdly, I hope that our regulators will work consistently to connect with parents, and recognise that parents should have a much larger say in what is appropriate or desirable for their children to see and hear.

In this Review, I make a series of recommendations; they take a largely consensual approach to the issues raised. To me, it is obvious that this is the best course. Nevertheless, I recognise it is also the most difficult.

And consensus comes most easily when a mature and constructive debate takes place to achieve a holistic approach to the issues raised by the Review; it is not enhanced by the prurient approach that has sometimes characterised the wide media coverage of these issues. By contrast, I have appreciated the maturity of the arguments put forward by the contributors to the Review. I believe my faith in those contributors to deliver on the recommendations will not be misplaced.

It may be that there will be those who argue that greater regulation and legislation is needed to deal with the issues raised. In my view, that would further disempower parents from taking the responsibility for their children upon themselves.

Finally, whilst it seems that the recommendations place responsibility for our children and young people on parents, businesses, broadcasters, other media, regulators and government; I believe it does not absolve any of us as responsible adults from creating the right sort of environment that allows our nation's children to be children. That way we all create and own a better society.

I want to take this opportunity to acknowledge the very real contribution made by previous reviewers: Professor David Buckingham and his team, Professor Tanya Byron, and Dr Linda Papadopoulos. It is upon their foundations that much of this present Review is based; and their constructive comments to me have been invaluable.

Patrick Barwise, James Best, Agnes Nairn, Sue Palmer, and Stewart Purvis have been the best of critical friends, fearless in their questioning, yet supportive and challenging. I thank them for all their efforts in this task. I have also greatly valued the support and encouragement of Rachel Aston, Laura Bedwell, Fleur Dorrell, and Fiona Thomas.

Thanks are due to the excellent team at the Department for Education: Louisa Ellisdon, John Hubbard, Joanna Leavesley, Gillian Machin, Catherine May, Helen Ralphson and Victoria Saunders, under the able leadership of Henry Watson, for their great commitment and energy. I have taken a team approach to conducting the Review, and this report is written from the perspective of us as a team.

Finally, I want to thank all those who contributed to the Review and, in particular, all those parents and children who have been so thoughtful and constructive in providing evidence. The children and young people who carried out research on their own initiative through the Office of the Children's Commissioner for England were especially impressive, and show so clearly that if we as parents can create the right environment in which our children can thrive, the future of all of us will be the better for it.

They make me believe it really is simple!

Introduction

Background

1. Nearly nine out of 10 parents surveyed for this Review agreed with the statement that 'these days children are under pressure to grow up too quickly' (TNS Omnibus survey, 2011). This confirms what many parents[1], politicians, academics and commentators have suspected for some time, that this is a widely held concern of parents that needs to be taken seriously.

2. This pressure on children to grow up takes two different but related forms: the pressure to take part in a sexualised life before they are ready to do so; and the commercial pressure to consume the vast range of goods and services that are available to children and young people of all ages.

3. The origins of this Review lie in the commitments made to deal with the commercialisation and sexualisation of childhood by both the Conservative and Liberal Democrat parties in their 2010 Election Manifestos, which became a commitment of the Coalition Agreement:

   "… strong and stable families of all kinds are the bedrock of a strong and stable society. That is why we need to make our society more family-friendly, and to take action to protect children from excessive commercialisation and premature sexualisation… We will crack down on irresponsible advertising and marketing, especially to children. We will also take steps to tackle the commercialisation and sexualisation of childhood."

   HM Government, 2010

4. In order to fulfil this commitment, Reg Bailey was appointed by the Secretary of State for Education on 6 December 2010 to lead an independent Review. The remit for the Review (see Annex A) was deliberately wide, giving him the freedom to focus on the aspects of concern he would identify through his research and discussions with parents and others. The Government wanted the Review to assess how children in this country are being pressured to grow up too quickly, and to make recommendations on how to address public concern about this. The Review acknowledges and builds on the previous work by the assessment panel led by Professor David Buckingham on the commercialisation of childhood (DCSF/DCMS, 2009), and the reviews by Dr Linda Papadopoulos on the sexualisation of young people (Papadopoulos, 2010), and Professor Tanya Byron on child internet safety (Byron, 2008 and Byron, 2010).

5. Commercialisation and sexualisation are issues where, to date, the media have often been leading the debate. Academics, including through the recent government reviews, have collected the evidence, investigated the complex issues and presented the range of views in a considered way. However, as the assessment led by Professor David Buckingham

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[1] The term 'parent' includes anyone with parental responsibility or who has care for a child, including for example some grandparents.

(DCSF/DCMS, 2009) made clear, this is an area where the evidence of harm is not conclusive and views are polarised.

6. The Review recognises that there is a rich and growing, if still inconclusive, body of research into these issues. However, we believe that the voices of parents should be heard more loudly in the debate and so we have had a clear and deliberate focus on enabling as many parents as possible to take part. Similarly, children themselves need to have their voices heard, and this Review has therefore tried to use what children and young people have told us to enable them to have a more direct voice.

7. We have set out in this Review to be honest about the problems. The vast majority of parents want their children to grow up happy, healthy and safe. Worries about the commercialisation and sexualisation of childhood are not likely to be their most immediate priority as they bring up their children. However, it is clear that when asked, many parents believe that their children do face these pressures. They are also concerned about some of the things they and their children see and have to deal with. Parents are happy to take responsibility for their children's upbringing, but they expect and want businesses and others to support them and to deal fairly and responsibly with children.

8. We have arrived at some practical actions that can be taken to make a difference to parents and children. We believe there is a good deal of willingness to embrace change voluntarily and without the need to resort immediately to new laws or statutory regulations. Nevertheless, the Government has made clear to us that, if satisfactory progress cannot be made on a voluntary basis, it will consider further legislation. Central to the task for businesses and regulators will be to make sure that parents' voices (and, wherever possible, those of children and young people themselves) are heard more strongly and heeded more often. Parents are the principal guardians of their children's happiness and healthy development, and we believe that their views have a special status beyond that of other groups.

9. The previous reviewers, and many contributors to this Review, have suggested that further research, particularly longitudinal research, should be undertaken to investigate whether there is any evidence of harm to children from commercialisation and sexualisation and how this harm occurs. No doubt more research will be helpful, but we should not wait for this before acting: insufficient evidence to prove conclusively there is harm to children does not mean that no harm exists. If parents are concerned that their children are exposed to potential harm from commercialisation and sexualisation, it is their common sense and their sense of what is right for their family that tells them this. We should use that same common sense and those same values to take a precautionary approach and say that there are actions we can and should take now to make our society a more family-friendly place. This Review was conducted with this principle firmly in mind.

10. This Review was asked to consider outlining some principles and definitions of excessive commercialisation and premature sexualisation, which could be used to help shape practice and regulation. We discussed this in detail with contributors, and considered the work already done by academics and experts to develop such definitions. The previous reviews of this area (Byron, 2008 and 2010; Papadopoulos, 2010; DCSF/DCMS, 2009) provide a comprehensive exposition of this work. The conclusion of this Review is that parents are the experts in deciding whether something is appropriate for their child and in discussing this with their children as they grow up. The most effective way to ensure that broadcasting, advertising, goods and services are appropriate for children is to pay closer attention to parents' views rather than develop complicated, and contested, definitions of commercialisation and sexualisation.

Who we involved

11. This Review has taken as its starting point the recent assessment led by Professor David Buckingham, the reviews led by Professor Tanya Byron and by Dr Linda Papadopoulos and an update by Professor Ann Phoenix commissioned for this Review (Phoenix, 2011). However, it also addresses the issue from the perspective of parents. We have had a huge response to the Review from parents and members of the public, and have heard from a large number of businesses and charities (Figure 1).

Figure 1: Contributors to this Review

> Nearly 1,000 parents completed our online Call for Evidence.

> Another 1,025 parents of 5-16 year-olds and 520 children and young people aged 7-16 took part in a face-to-face nationally representative omnibus survey.

> 70 parents took part in qualitative research, including interviews and focus groups.

> 552 children and young people took part in a survey organised by the Office for the Children's Commissioner for England and Amplify, their Children and Young People Advisory Group.

> Facilitated by the National Children's Bureau, the Children and Youth Board of the Department for Education held a session to discuss the Review, and submitted their conclusions to Reg Bailey.

> 120 organisations and businesses provided written submissions to our Call for Evidence.

> Over 40 organisations and experts had individual meetings with Reg Bailey.

> Numerous members of the public rang, e-mailed and wrote to the team to share their views.

12.	Further details are in Annexes B, C, and D. A summary of the TNS Omnibus survey, the Call for Evidence from parents, the parent qualitative research conducted by Define Research & Insight, and the question sets for both Calls for Evidence are published separately to this report (www.education.gov.uk). The rapid review of most recent academic evidence (Phoenix, 2011) and an analysis of the regulatory systems of other countries (Statham, Mooney and Phoenix, 2011), both of which we commissioned from the Childhood Wellbeing Research Centre (CWRC), are published on the CWRC website (http://www.cwrc.ac.uk/projects.html).

The themes

13.	As the Review progressed we identified four key themes that particularly concerned parents and the wider public, which we explore further in this report.

Theme 1 – the 'wallpaper' of children's lives

14.	We are all living in an increasingly sexual and sexualised culture, although it is far from clear how we arrived at this point. Many parents feel that this culture is often inappropriate for their children. They want more power to say 'no'. Some parts of the business world and sections of the media seem to have lost their connection to parents and this is compounded in some new media where there is limited regulation. Where regulation does exist, regulators need to connect better with parents and encourage businesses to comply with the 'spirit of the regulation'. Where regulation does not exist, businesses need to behave more responsibly.

Theme 2 – clothing, products and services for children

15.	Sexualised and gender-stereotyped clothing, products and services for children are the biggest areas of concern for parents and many non-commercial organisations contributing to the Review, with interest fanned by a sometimes prurient press. The issues are rarely clear-cut, with a fine balance on a number of points – taste, preference, choice, affordability, fashion and gender preferences. Retailers are aware of the issues and sensitivities, and they are responding. They need to be explicitly and systematically family friendly, from design and buying through to display and marketing.

Theme 3 – children as consumers

16.	We all live in a commercial world and children are under pressure from a range of sources to act as consumers. We do not want to cut children off from the commercial world completely as we believe that it brings benefits and parents tell us that they want to manage the issue themselves, supported by proportionate regulation and responsible businesses. While adults may understand that companies might look to 'push the boundaries' when advertising to them, children are especially vulnerable and need to be given special consideration. Special measures already exist in advertising and marketing

regulations to protect children but some gaps exist. Regulators cannot realistically be expected to anticipate detailed developments in the new media. However, an absence of regulation does not absolve businesses from acting responsibly by themselves.

Theme 4 – making parents' voices heard

17. Parents have told us that they feel they cannot make their voices heard, and that they often lack the confidence to speak out on sexualisation and commercialisation issues for fear of being labelled a prude or out of touch. Business and industry sectors and their regulators need to make clear that they welcome, and take seriously, feedback on these subjects. Given the technology available, regulators and businesses should be able to find more effective ways to encourage parents to tell them what they think, quickly and easily, and to be transparent in telling parents how they are responding to that feedback. Once parents know that their views are being taken seriously, we would expect them to respond positively towards companies that listen to their concerns.

What is our answer?

18. The Review has encountered two very different approaches towards helping children deal with the pressures to grow up too quickly. The first approach seems to suggest that we can try to keep children wholly innocent and unknowing until they are adults. The world is a nasty place and children should be unsullied by it until they are mature enough to deal with it. This is a view that finds its expression in outrage, for example, that childrenswear departments stock clothes for young children that appear to be merely scaled-down versions of clothes with an adult sexuality, such as padded bras. It depends on an underlying assumption that children can be easily led astray, so that even glimpses of the adult world will hurry them into adulthood. Worse still, this approach argues, what children wear or do or say could make them vulnerable to predators or paedophiles.

19. The second approach is that we should accept the world for what it is and simply give children the tools to understand it and navigate their way through it better. Unlike the first approach, this is coupled with an assumption that children are not passive receivers of these messages or simple imitators of adults; rather they willingly interact with the commercial and sexualised world and consume what it has to offer. This is a view that says to do anything more than raise the ability of children to understand the commercial and sexual world around them, and especially their view of it through the various media, is to create a moral panic. The argument suggests that we would infantilise adults if we make the world more benign for children, so we should 'adultify' children.

20. This Review concludes that neither approach, although each is understandable, can be effective on its own. We recognise that the issues raised by the commercialisation and sexualisation of childhood are rooted in the character of our wider adult culture and that children need both protection from a range of harms, and knowledge of different kinds, appropriate to their age, understanding and experience. Parents have the primary role here

but others have a responsibility to play an active part too, including businesses, the media and their regulators. Above all, however, we believe that a truly family-friendly society would not need to erect barriers between age groups to shield the young: it would, instead, uphold and reinforce healthy norms for adults and children alike, so that excess is recognised for what it is and there is transparency about its consequences. The creation of a truly family-friendly society is the aspiration: in the meantime, we need a different approach.

21. This approach means both putting the brakes on an unthinking drift towards ever greater commercialisation and sexualisation, while also helping children understand and resist the potential harms they face.

22. For us to let children be children, we need parents to be parents. Parents are clear that they have the main responsibility to raise their children, and to help them deal with the pressures of growing up. What parents have said, however, is that they need help to do so, and that businesses and broadcasters have a part to play in creating a more family-friendly world. We also want it to be more socially acceptable for parents and others to say that they are not happy about aspects of sexualisation and commercialisation, without fearing ridicule or appearing out of touch. Because of the responsibilities that parents have for their children, we believe that their views need to be given extra consideration in this regard, more than perhaps any other section of society. We consider that businesses, the media and regulators all have a role to play in signalling that such feedback is welcome and indeed normal. Those channels by-and-large already exist but in many cases they are neither as effective nor as transparent as they should be. The recommendations of this Review provide practical actions to help support and give a voice to parents in this way, but it is then for parents to make the most of these tools and avenues.

23. This approach also requires parents to acknowledge their own ambivalence towards some aspects of commercialisation and sexualisation. By not using parental internet controls, by buying an 18-rated game for a younger child, by wanting their children to have the latest technology and most fashionable clothes, parents can themselves be complicit in adding to the pressures.

What next?

24. This report sets out some of the things that businesses and their regulators, as well as Government, can do to minimise the commercialisation and sexualisation of childhood. There are more detailed recommendations in each chapter of the report. Concerns about these issues have been with us for a long time, however, and this Review, as others before it, certainly cannot provide a single solution. The debate will continue, but must do so in a constructive and balanced way, with the media as well as campaigning groups keeping a healthy debate alive.

25. There is no doubt that some businesses across the various sectors are doing a good job in working with parents and only providing goods and services for and to children that are appropriate for them. But those who are not need to step up and be as good as the best. Businesses of all kinds need to be more proactive in encouraging feedback from parents and, when necessary, complaints. We think there is enough goodwill in the sector for this to happen without legislation. In relation to inappropriate advertising and marketing, parents want businesses to play fair when selling to children and not to take advantage of any gaps in the regulatory framework, especially regarding new media.

26. Some may object that changing business practices in the ways recommended and being more responsive to the needs of their customers and consumers has a cost implication. Our argument is that doing things a little differently benefits not just children and parents but businesses too, through helping them develop and provide the kinds of goods and services that children and parents really want and are more likely to buy, and also by increasing customer confidence in the business.

27. We know that the ambitions of this Review, to reduce the pressures of the commercial world on children and of premature sexualisation to a minimum, cannot be achieved overnight. Nor should we accept a timid approach when there is obvious goodwill to draw on and concrete examples from different business sectors and regulators of changes that are already being made. We therefore propose that, if it accepts the recommendations in this report, the Government should take stock of progress 18 months from now. The Government may at that point feel the need to bring in further regulation to complete the task. But, for now, there is good reason to believe that the business community, supported by engaged and responsible parents, can show that it is capable of playing its part in putting the brakes on the unthinking drift towards an increasingly commercialised and sexualised world for children.

Summary
of Report and
Recommendations

Theme 1 – The 'Wallpaper' of Children's Lives

Overview

> We are all living in an increasingly sexual and sexualised culture, although it is far from clear how we arrived at this point.

> Many parents feel that this culture is often inappropriate for their children and they want more power to say 'no'.

> Some parts of the business world and sections of the media seem to have lost their connection to parents and this is compounded in some new media where there is limited regulation.

> Where regulation does exist, regulators need to connect better with parents and encourage businesses to comply with the 'spirit of the regulation'. Where regulation does not exist, businesses need to behave more responsibly.

What we would like to see

That sexualised images used in public places and on television, the internet, music videos, magazines, newspapers and other places are more in line with what parents find acceptable, and that public space becomes more family-friendly.

Recommendations

1. **Ensuring that magazines and newspapers with sexualised images on their covers are not in easy sight of children.** Retail associations in the news industry should do more to encourage observance of the voluntary code of practice on the display of magazines and newspapers with sexualised images on their covers. Publishers and distributors should provide such magazines in modesty sleeves, or make modesty boards available, to all outlets they supply and strongly encourage the appropriate display of their publications. Retailers should be open and transparent to show that they welcome and will act on customer feedback regarding magazine displays. *ACTION: Publishers, distributors, retailers and retail associations in the news industry, including the National Federation of Retail Newsagents and the Association of News Retailing*

2. **Reducing the amount of on-street advertising containing sexualised imagery in locations where children are likely to see it.** The advertising industry should take into account the social responsibility clause of the Committee of Advertising Practice (CAP) code when considering placement of advertisements with sexualised imagery near schools, in the same way as they already do for alcohol advertisements. The Advertising Standards Authority (ASA) should place stronger emphasis on the location of an advertisement, and the number of children likely to be exposed to it, when considering whether an on-street advertisement is compliant with the CAP code. The testing of standards that the ASA

undertakes with parents (see Recommendation 7) should also cover parental views on location of advertising in public spaces. *ACTION: Advertisers, advertising industry bodies, and the ASA*

3. **Ensuring the content of pre-watershed television programming better meets parents' expectations.** There are concerns among parents about the content of certain programmes shown before the watershed. The watershed was introduced to protect children, and pre-watershed programming should therefore be developed and regulated with a greater weight towards the attitudes and views of parents, rather than 'viewers' as a whole. In addition, broadcasters should involve parents on an ongoing basis in testing the standards by which family viewing on television is assessed and the Office of Communications (Ofcom) should extend its existing research into the views of parents on the watershed. Broadcasters and Ofcom should report annually on how they have specifically engaged parents over the previous year, what they have learnt and what they are doing differently as a result. *ACTION: Ofcom, broadcasters*

4. **Introducing Age Rating for Music Videos.** Government should consult as a matter of priority on whether music videos should continue to be treated differently from other genres, and whether the exemption from the Video Recordings Act 1984 and 2010, which allows them to be sold without a rating or certificate, should be removed. As well as ensuring hard copy sales are only made on an age-appropriate basis, removal of the exemption would assist broadcasters and internet companies in ensuring that the content is made available responsibly. *ACTION: Government*

5. **Making it easier for parents to block adult and age-restricted material from the internet**: To provide a consistent level of protection across all media, as a matter of urgency, the internet industry should ensure that customers must make an active choice over what sort of content they want to allow their children to access. To facilitate this, the internet industry must act decisively to develop and introduce effective parental controls, with Government regulation if voluntary action is not forthcoming within a reasonable timescale. In addition, those providing content which is age-restricted, whether by law or company policy, should seek robust means of age verification as well as making it easy for parents to block underage access. *ACTION: Internet industry and providers of age-restricted content, through the UK Council for Child Internet Safety (UKCCIS)*

Theme 2 – Clothing, Products and Services for Children

Overview

> Sexualised and gender-stereotyped clothing, products and services for children are the biggest areas of concern for parents and many non-commercial organisations contributing to the Review, with interest fanned by a sometimes prurient press.

> The issues are rarely clear-cut, with a fine balance on a number of points – taste, preference, choice, affordability, fashion and gender preferences.

> Retailers are aware of the issues and sensitivities and are responding. They need to be explicitly and systematically family friendly, from design and buying through to display and marketing.

What we would like to see

That retailers do not sell or market inappropriate clothing, products or services for children.

Recommendations

6. **Developing a retail code of good practice on retailing to children.** Retailers, alongside their trade associations, should develop and comply with a voluntary code of good practice for all aspects of retailing to children. The British Retail Consortium (BRC) should continue its work in this area as a matter of urgency and encourage non-BRC members to sign up to its code. *ACTION: Retailers and retail associations, including the BRC*

Theme 3 – Children as Consumers

Overview

> We all live in a commercial world and children are under pressure from a range of sources to act as consumers.

> We do not want to cut children off from the commercial world completely as we believe that it brings benefits and parents tell us that they want to manage the issue themselves, supported by proportionate regulation and responsible businesses.

> While adults may understand that companies might look to 'push the boundaries' when advertising to them, children are especially vulnerable and need to be given special consideration.

> Special measures already exist in advertising and marketing regulations to protect children but some gaps exist.

> Regulators cannot realistically be expected to anticipate detailed developments in the new media. However, an absence of regulation does not absolve businesses from acting responsibly by themselves.

What we would like to see

That the regulations protecting children from excessive commercial pressures are comprehensive and effective across all media and in line with parental expectations.

That marketers do not exploit any gaps in advertising regulation in order to unduly influence the choices children make as consumers.

That parents and children have a sound awareness and understanding of marketing techniques and regulation.

Recommendations

7.   **Ensuring that the regulation of advertising reflects more closely parents' and children's views.** The Advertising Standards Authority (ASA) should conduct research with parents and children on a regular basis in order to gauge their views on the ASA's approach to regulation and on the ASA's decisions, publishing the results and subsequent action taken in their annual report. *ACTION: ASA*

8.   **Prohibiting the employment of children as brand ambassadors and in peer-to-peer marketing.** The Committee of Advertising Practice and other advertising and marketing bodies should urgently explore whether, as many parents believe, the advertising self-regulatory codes should prohibit the employment of children under the age of 16 as brand ambassadors or in peer-to-peer marketing – where people are paid, or paid in kind, to promote products, brands or services. *ACTION: Committee of Advertising Practice, the Advertising Association and relevant regulators*

9.   **Defining a child as under the age of 16 in all types of advertising regulation.** The ASA should conduct research with parents, children and young people to determine whether the ASA should always define a child as a person under the age of 16, in line with the Committee of Advertising Practice and Broadcast Committee of Advertising Practice codes. *ACTION: ASA*

10.   **Raising parental awareness of marketing and advertising techniques.** Industry and regulators should work together to improve parental awareness of marketing and advertising techniques and of advertising regulation and complaints processes and to promote industry best practice. *ACTION: Advertising and marketing industry, with the ASA and the Advertising Association*

11.   **Quality assurance for media and commercial literacy resources and education for children.** These resources should always include education to help children develop their emotional resilience to the commercial and sexual pressures that today's world places on them. Providers should commission independent evaluation of their provision, not solely measuring take-up but, crucially, to assess its effectiveness. Those bodies with responsibilities for promoting media literacy, including Ofcom and the BBC, should encourage the development of minimum standards guidance for the content of media and commercial literacy education and resources to children. *ACTION: Media and commercial literacy providers, with Ofcom and the BBC*

Theme 4 – Making Parents' Voices Heard

Overview

> Parents have told us that they feel they cannot make their voices heard, and that they often lack the confidence to speak out on sexualisation and commercialisation issues for fear of being labelled a prude or out of touch.

> Business and industry sectors and their regulators need to make clear that they welcome, and take seriously, feedback on these subjects.

> Given the technology available, regulators and businesses should be able to find more effective ways to encourage parents to tell them what they think, quickly and easily, and to be transparent in telling parents how they are responding to that feedback.

> Once parents know that their views are being taken seriously, we would expect them to respond positively towards companies that listen to their concerns.

What we would like to see

That parents find it easier to voice their concerns, are listened to more readily when they do, and have their concerns visibly acted on by businesses and regulators.

Recommendations

12. **Ensuring greater transparency in the regulatory framework by creating a single website for regulators.** There is a variety of co-, self- and statutory regulators across the media, communications and retail industries. Regulators should work together to create a single website to act as an interface between themselves and parents. This will set out simply and clearly what parents can do if they feel a programme, advertisement, product or service is inappropriate for their children; explain the legislation in simple terms; and provide links to quick and easy complaints forms on regulators' own individual websites. This single website could also provide a way for parents to provide informal feedback and comments, with an option to do so anonymously, which regulators can use as an extra gauge of parental views. Results of regulators' decisions, and their reactions to any informal feedback, should be published regularly on the single site. *ACTION: Regulators*

13. **Making it easier for parents to express their views to businesses about goods and services.** All businesses that market goods or services to children should have a one-click link to their complaints service from their home page, clearly labelled 'complaints'. Information provided as part of the complaints and feedback process should state explicitly that the business welcomes comments and complaints from parents about issues affecting children. Businesses should also provide timely feedback to customers in reaction to customer comment. For retail businesses this should form part of their code of good practice (see Theme 2, Recommendation 6), and should also cover how to make it

easier and more parent-friendly for complaints to be made in store. *ACTION: Businesses, supported by trade associations*

Conclusion

Overview

> The Government should monitor implementation and formally review progress in 18 months' time.

> A stocktake, to include an independent assessment of progress, should report on the success or otherwise of business, regulators and Government in adopting the recommendations of this Review.

> If the stocktake reaches the conclusion that insufficient progress has been made, our view is that the Government would be fully entitled to bring forward appropriate statutory measures to ensure action is taken.

What we want to see

That the actions recommended in the report are implemented by broadcasters, advertisers, retailers, other businesses and regulators within a reasonable timescale.

Recommendation

14. **Ensuring that businesses and others take action on these recommendations**. Government should take stock of progress against the recommendations of this review in 18 months' time. This stocktake should report on the success or otherwise of businesses and others in adopting these recommendations. If it concludes that insufficient progress has been made, the Government should consider taking the most effective action available, including regulating through legislation if necessary, to achieve the recommended outcome. *ACTION: Government*

The 'Wallpaper' of Children's Lives

> "I feel that today's society encourages children to grow up too quickly, we do not allow them to be children. The media, technology, celebrities, advertising all contribute towards this.

Parent, Call for Evidence response

Overview

> We are all living in an increasingly sexual and sexualised culture, although it is far from clear how we arrived at this point.

> Many parents feel that this culture is often inappropriate for their children and they want more power to say 'no'.

> Some parts of the business world and sections of the media seem to have lost their connection to parents and this is compounded in some new media where there is limited regulation.

> Where regulation does exist, regulators need to connect better with parents and encourage businesses to comply with the 'spirit of the regulation'. Where regulation does not exist, businesses need to behave more responsibly.

WHAT WE WOULD LIKE TO SEE

That sexualised images used in public places and on television, the internet, music videos, magazines, newspapers and other places are more in line with what parents find acceptable, and that the public space becomes more family friendly.

RECOMMENDATIONS

1. **Ensuring that magazines and newspapers with sexualised images on their covers are not in easy sight of children.** Retail associations in the news industry should do more to encourage observance of the voluntary code of practice on the display of magazines and newspapers with sexualised images on their covers. Publishers and distributors should provide such magazines in modesty sleeves, or make modesty boards available, to all outlets they supply and strongly encourage the appropriate display of their publications. Retailers should be open and transparent to show that they welcome and will act on customer feedback regarding magazine displays. *ACTION: Publishers, distributors, retailers and retail associations in the news industry, including the National Federation of Retail Newsagents and the Association of News Retailing*

2. **Reducing the amount of on-street advertising containing sexualised imagery in locations where children are likely to see it.** The advertising industry should take into account the social responsibility clause of the Committee of Advertising Practice (CAP) code when considering placement of advertisements with sexualised imagery near schools, in the same way as they already do for alcohol advertisements. The Advertising Standards Authority (ASA) should place stronger emphasis on the

location of an advertisement, and the number of children likely to be exposed to it, when considering whether an on-street advertisement is compliant with the CAP code. The testing of standards that the ASA undertakes with parents (see Recommendation 7) should also cover parental views on location of advertising in public spaces. *ACTION: Advertisers, advertising industry bodies, and the ASA*

3. **Ensuring the content of pre-watershed television programming better meets parents' expectations.** There are concerns among parents about the content of certain programmes shown before the watershed. The watershed was introduced to protect children, and pre-watershed programming should therefore be developed and regulated with a greater weight towards the attitudes and views of parents, rather than 'viewers' as a whole. In addition, broadcasters should involve parents on an ongoing basis in testing the standards by which family viewing on television is assessed and the Office of Communications (Ofcom) should extend its existing research into the views of parents on the watershed. Broadcasters and Ofcom should report annually on how they have specifically engaged parents over the previous year, what they have learnt and what they are doing differently as a result. *ACTION: Ofcom, broadcasters*

4. **Introducing Age Rating for Music Videos.** Government should consult as a matter of priority on whether music videos should continue to be treated differently from other genres, and whether the exemption from the Video Recordings Act 1984 and 2010, which allows them to be sold without a rating or certificate, should be removed. As well as ensuring hard copy sales are only made on an age-appropriate basis, removal of the exemption would assist broadcasters and internet companies in ensuring that the content is made available responsibly. *ACTION: Government*

5. **Making it easier for parents to block adult and age-restricted material from the internet.** To provide a consistent level of protection across all media, as a matter of urgency, the internet industry should ensure that customers must make an active choice over what sort of content they want to allow their children to access. To facilitate this, the internet industry must act decisively to develop and introduce effective parental controls, with Government regulation if voluntary action is not forthcoming within a reasonable timescale. In addition, those providing content which is age-restricted, whether by law or company policy, should seek robust means of age verification as well as making it easy for parents to block underage access. *ACTION: Internet industry and providers of age-restricted content, through the UK Council for Child Internet Safety (UKCCIS)*

Introduction

1. Sexualised imagery is now a mainstream part of children's lives, forming the 'wallpaper' or backdrop to their everyday activities whether in public places through billboards and shop windows, or in the home through television and other media (National Federation of Retail Newsagents, 2011; Scottish Parliament, February 2011).

2. There is evidence that our society is becoming more sexualised (Attwood, 2009; Nikunen et al, 2007) and the increasing number of media channels through which we receive these messages mean that we are under ever-increasing exposure to sexualised content and imagery. Sadly, some parent contributors even felt that there is 'no escape' and, for children, no 'clear space' where they can simply be themselves. And the nature of this imagery is becoming increasingly explicit (Attwood, 2009) – commentators have referred to the 'pornification' of society – with the blurring of boundaries between pornography and the mainstream (Nikunen et al, 2007).

3. These images are being used not only in the editorial content of television programmes, music videos, websites, magazines and newspapers, but also by the commercial world through advertising and marketing.

4. We have heard a particular concern that the television programmes that people have traditionally watched as family viewing, such as talent shows and soaps, are starting to push the boundaries of acceptability by including increasingly sexualised content.

5. Some contributors to the Review are of the opinion that the 'genie is out of the bottle' and that this is simply 'how things are'. Individual parents feel particularly powerless as lone voices – and this is a good reason why those with the power to change things should start to do so.

> *I think that it's crept up on us gradually and this makes it difficult to take a stand against it.*
>
> *Unfortunately, we have all become so used to the ubiquity of these images and messages that we no longer always register them consciously. This is worrying.*
>
> **Parents, Call for Evidence response**

6. Finally, serious concerns have been voiced to the Review about the ease of access to age-restricted and adult-only material on the internet and through video-on-demand and via mobile phones, and the inconsistent, and in some cases non-existent, controls on accessing such material by children and young people.

Volume and nature of sexualised images – magazine displays

7. There is a widespread and specific concern, expressed both through our parental Call for Evidence and through the public campaigns in this area, about the display of magazines and tabloid newspapers with sexualised front covers or front pages on shelves where young children can see them. Although the content of such 'lads' mags' and newspapers is not pornography in the accepted sense (that is, not strong enough to be considered as 'top shelf' magazines), they trade on their sexualised content and many parents think retailers should treat them in the same way as they treat pornography.

> *Parents can control lots of things in the home. But when you are outside the home it's tricky… magazine covers are really difficult.*
>
> *I think inappropriate sexualised images on the front cover of magazines such as ['lads' mags'] are the worst. These are not classed as top shelf magazines and so are on shelving where children are able to view them easily.*
>
> **Parents, Call for Evidence response**

8. There is a voluntary code of practice for newsagents, developed by the National Federation of Retail Newsagents (NFRN), approved by the Professional Publishers Association and endorsed by the Department for Culture, Media and Sport (DCMS), the Home Office, the British Retail Consortium (BRC) and the Association News Retailers through the Association of Convenience Stores. This voluntary code advises retailers to be sensitive to consumer concerns, to display these magazines above children's eye level and away from children's comics (National Federation of Retail Newsagents, 2011). Where space restraints mean that this advice cannot be followed, newsagents are advised to partially cover the titles in question. We note that larger retailers now often put boards with the magazine logo or branding in front of each of the magazine titles on display (known as 'modesty boards') so that the front covers of these magazines are hidden but customers are aware that the magazines are in stock.

9. The NFRN has made clear to the Review that while the major retailers may find this code of practice relatively easy to follow, smaller businesses may not. Nor do they think it likely there will be full compliance across thousands of sites (the NFRN alone represents 16,000 retailers). This view is supported to an extent by research carried out for the Scottish Parliament earlier this year (Scottish Parliament, 2011). However, businesses which are often in the heart of communities and widely used by families for small purchases need to be conscious of their relationship to all their customers, not just the purchasers of the magazines. The NFRN code of practice makes clear that:

"Making your customers aware that you adopt a 'family-friendly' policy on display, you may find that parents with children are much happier to shop in your store."

National Federation of Retail Newsagents, 2011

10. Following a campaign led by Mumsnet (Mumsnet (1)), a number of major retailers including supermarkets and petrol stations have agreed to take measures to ensure that 'lads' mags' are displayed out of the view of children. This is a very welcome development, but should be adopted across the whole of the news retail industry.

RECOMMENDATION

1. **Ensuring that magazines and newspapers with sexualised images on their covers are not in easy sight of children.** Retail associations in the news industry should do more to encourage observance of the voluntary code of practice on the display of magazines and newspapers with sexualised images on their covers. Publishers and distributors should provide such magazines in modesty sleeves, or make modesty boards available, to all outlets they supply and strongly encourage the appropriate display of their publications. Retailers should be open and transparent to show that they welcome and will act on customer feedback regarding magazine displays.
    ACTION: Publishers, distributors, retailers and retail associations in the news industry, including the National Federation of Retail Newsagents and the Association of News Retailing

Volume and nature of sexualised images – in advertising

11. In our Call for Evidence from parents we asked whether, when they had been out and about with their children in the last few weeks, they had seen any images aimed at adults that they thought were inappropriate for their children to see. A majority (576) of the 846 respondents who answered this question said they had. These parents who had seen things they thought were inappropriate were then asked to give details of what they had seen, and of those:

> 134 mentioned shop displays with the majority concerned about the display of 'lads' mags' in newsagents, supermarkets and petrol stations.

> 113 respondents were unhappy with on-street advertising such as billboards and posters in bus shelters.

> 63 respondents specifically mentioned the sexual imagery in advertisements for perfume and lingerie.

12. Similarly, 40 per cent of parents in the omnibus survey for the Review said they had seen things in public places (e.g. shop window displays, advertising hoardings) that they felt were unsuitable or inappropriate for children to see because of their sexual content in the three months since November 2010 (this included images other than in advertisements).

13. These figures show that a significant minority of parents feel negative effects from some images displayed, including advertising, in the public space. Unlike advertisements on television or radio, there is no option to 'switch off' on-street advertisements – there is no choice but to be exposed to them on, for example, billboards, bus shelters and public transport.

14. Advertisements for perfumes on posters and in magazines, mentioned by a few parents in our Call for Evidence, were also singled out by parenting, education, women's and children and young people's organisations. These contributors expressed a perception that the men and women in these advertisements are often portrayed in highly sexualised ways and shown in stereotyped gender roles. It was felt that this put particular pressure on children and young people – both girls and boys – to conform both to certain body shapes and 'looks', and to particular gender roles.

15. Parents in our qualitative research (Define, 2011), when shown copies of posters used in advertising campaigns for clothing, made a distinction between images where the posing of the models glamourised or portrayed sexual availability and those where a clear message about the garment (for example, its quality and cost) was used. The former were more objectionable than the latter, even if the latter used models that were less covered-up by the clothes.

> *Advertising for perfumes is almost always of a sexual nature.*
>
> *Perfume adverts are particularly inappropriate as they often include semi-naked women or couples.*
>
> **Parents, Call for Evidence response**

16. Advertising is regulated by the Advertising Standards Authority (ASA), through the application of the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) codes. This regulatory system appears to be working well in general, but we consider that an element of added caution is warranted in the consideration of content and placement of advertising in public places. A significant minority of parents told us they were affected by on-street advertising, and the fact that members of the public, including children, cannot control their exposure to such advertisements does, we believe, place an element of added responsibility on advertisers.

17. Contributors to the Review drew our attention to the tighter, albeit voluntary, restrictions on the locating of alcohol advertising close to schools. The voluntary code of practice

for members of the Outdoor Media Centre, the trade body for outdoor media owners, states that:

"In the interests of responsible advertising to protect minors from undue exposure to alcohol advertising, Outdoor Media Centre members shall commit to not displaying alcohol advertising on static panels located within a 100 metre radius of school gates."

Outdoor Media Centre, 2011

18. These restrictions, voluntarily adopted by the industry, are an encouraging example of responsible marketing practice, and we believe that similar measures should be adopted with respect to advertisements containing sexualised imagery. The ASA already takes location into account as part of the overall context when considering the compliance of advertisements to the CAP code, but we believe that stronger emphasis should be placed on location. In addition, parental views on the location of advertising in public spaces should also be sought (see more on the seeking of parental views in Theme 3).

RECOMMENDATION

2. Reducing the amount of on-street advertising containing sexualised imagery in locations where children are likely to see it. The advertising industry should take into account the social responsibility clause of the Committee of Advertising Practice (CAP) code when considering placement of advertisements with sexualised imagery near schools, in the same way as they already do for alcohol advertisements. The Advertising Standards Authority (ASA) should place stronger emphasis on the location of an advertisement, and the number of children likely to be exposed to it, when considering whether an on-street advertisement is compliant with the CAP code. The testing of standards that the ASA undertakes with parents (see Recommendation 7) should also cover parental views on location of advertising in public spaces. *ACTION: Advertisers, advertising industry bodies, and the ASA*

Volume and nature of sexualised content – on television

19. As noted at the beginning of this chapter, sexualised culture is now mainstream in children's lives, and there is evidence that sexualised imagery and content have become more explicit in its nature, with a perception that its volume is expanding due to the increasing number of media channels available to adults and children.

20. Parents contributing to the Review objected to behaviour that diminishes their own ability to manage these pressures, typically by putting the parent in a position of having to deal with something at a time or place they did not choose or by being excluded altogether.

21. A primary concern was the issue of sexual material in family viewing programmes on television, for example in talent shows and soaps. Numerous examples were submitted of pre-watershed, and cross-watershed programmes where parents felt that programme makers were pushing the boundaries unnecessarily. In the omnibus survey for this Review, 41 per cent of parents said that during the last three months they had seen programmes or advertisements on television before 9pm that they felt were unsuitable or inappropriate for children to see because of sexual content. This was echoed by parents in our Call for Evidence.

> *It is unfortunate that the lazy, uninventive 'sex sells' attitude of the media which plasters sexual images and articles everywhere, causes parents to have to address the topic with their children a lot sooner than many would like, before they are at an age where they are emotionally equipped to understand it.*
>
> **Parent, Call for Evidence response**

> *There is too much sexual (and violent) content before the watershed, particularly in soaps... The other problem is often programmes are repeated on digital channels at different hours of the day.*
>
> *I find that many of the TV programmes e.g. [evening soap opera] are inappropriate for the time of day they are shown (even the advertisements for many of the programmes are inappropriate).*
>
> **Parent, Call for Evidence response**

22. Parents focused particularly on the storylines of soaps and the sexualised content and imagery of reality and talent shows. A particular issue was highlighted around music performances in entertainment and talent shows during family viewing hours. There was a perception that such performances were heavily influenced by the sexualised and gender-stereotyped content of music videos, and that they were more 'raunchy' than was appropriate for that type of viewing.

23. We believe that there is a strong sense that broadcasters are at times actively working against parents, and some parents have expressed a good degree of disappointment that the traditionally trusted control of the television 'watershed' appears to be less strictly observed than in the past. Some parents even questioned whether the watershed still exists.

> 66 *The 9pm watershed does not seem to exist anymore. Either that or things that are now deemed acceptable viewing content for children are not what I consider to be appropriate.* 99

> 66 *What happened to the TV watershed? Does it exist anymore? If so does it apply to all TV channels?* 99

Parent, Call for Evidence response

24. Broadcasters argue that the watershed is still an effective control and well understood by parents:

    "We believe television generally is trusted by parents. Conventions such as the watershed make clear what sort of programming is available at what time."

    "The television watershed is an industry standard and is well known and understood by the audience… In all but exceptional circumstances, programmes before 9pm are suitable for general audiences including children."

    Broadcasters, Call for Evidence response

25. The Office of Communications (Ofcom), the broadcast regulator, conducts regular research in this area, including its Media Literacy Audit, research on attitudes towards sexual material on television (Opinion Leader, 2009) and its Media Tracker, which monitors the general public's attitudes to television content and the watershed. This data shows good levels of awareness of the watershed amongst respondents with children in the household (Figure 2).

Figure 2: Audience awareness of the television watershed

> 93 per cent of respondents are aware of the watershed.

> 74 per cent of respondents think the time of the watershed is about right (up from 72 per cent last year).

> The proportion of people who think the watershed should be earlier has remained steady over the last decade at 9 per cent.

> 72 per cent think the overall level of regulation for television programmes is about right.

Source: Ofcom, 2010

26. However, the fact that some parents report otherwise should cause broadcasters concern. BBC audience research (BBC, 2009) shows that the views of the general audience (not just parents) are often offended by programming too (Figure 3).

Figure 3: BBC audience views on taste and standards

> 46 per cent of the viewing audience surveyed thought that morality, values or standards of behaviour in TV programmes have been getting worse in recent years.

> Issues of top concern were strong language, violence and sexual content on TV.

> 50 per cent said they 'personally see or hear things on television which you find offensive'.

> 40 per cent of the audience reported they had seen or heard something on TV in the last 12 months that they felt should not have been broadcast.

Source: BBC, 2009

27. What is more, the broadcasters we spoke to accept that, to a certain extent, the watershed really only serves to protect younger children, typically those of primary school age, and that once children are old enough to be able to choose the programmes they watch, then they are also mature enough to enjoy stronger content in the later part of the pre-watershed period and just after it:

"There are variations in how the watershed is used to regulate children's television viewing. The watershed plays a crucial role for parents with children aged 5-8, and the trust in pre-watershed programming, particularly that leading up to 7.30pm, forms an essential part of parents' regulation and control of children's viewing. However, by the time children reach their teens, parents believe that 'they know it already' and that it is no longer appropriate to protect them too much. While violence was the type of content identified by viewers as the type of content which caused most concern, they were most likely to nominate programmes with sex and swearing as those they did not want their children to watch."

Broadcaster, Call for Evidence response

28. The broadcasters contributing to the Review also reported that parents often welcome the opportunities to talk to their children that arise from the storylines in popular dramas: they can discuss the difficult social or moral issues raised by the plots and characterisations with their children but without having to make the discussion personal. There was also a view that the audience 'understood' that if a programme was broadcast on a particular channel, or had a certain kind of presenter or guests, they would expect a certain 'edginess' and would be prepared accordingly. Broadcasters also shared the view that, since they do not want viewers to change channel or switch off their television if they see something they do not like, there is no incentive to produce offensive material.

29. Clearly television cannot be indifferent to popular culture or turn its back on pop music, comedy or other popular entertainments. Nor are we suggesting that pre-watershed dramas should not deal with difficult issues. Yet it appears to be the case that many parents are concerned about the content of certain programmes shown before the watershed and that pre-watershed programming can be unexpectedly difficult for parents. We believe that parents do not accept, for example, that if a variety show features a pop musician with a reputation for delivering highly sexualised performances that the broadcaster has licence to sail as close to the edge of compliance with the Broadcasting Code as possible. It appears from a recent ruling that Ofcom agrees with this: in response to over 2,800 complaints from viewers about the live performances of Rihanna and Christina Aguilera on the X Factor final show of 11 December 2010, Ofcom found that while the content of the programme did not breach the Broadcasting Code:

"Ofcom will shortly be issuing new guidance about the acceptability of material in pre-watershed programmes that attract large family viewing audiences. We will also be requesting that broadcasters who transmit such programming attend a meeting at Ofcom to discuss the compliance of such material."

Ofcom, 2011(1)

30. We think that this is a helpful decision. It is clear that all broadcasters want, for a variety of reasons, to show programmes that have a mass appeal. Often, generating that appeal means developing programmes which whole families can watch together. With that desire to build a mass audience comes a responsibility to those who commission, make, broadcast and regulate television to ensure that their concept of what constitutes family viewing aligns closely with the values and concerns of the families watching. However, it appears that the broadcasting industry needs to do more to connect with families whose attention they want to hold. Further, we do not believe they should simply rely on audiences 'voting with their remote controls' to determine what audiences would find acceptable: the onus is on broadcasters to show acceptable content in the first place, not to react to audience complaints after the event.

31. We fully respect the editorial independence of broadcasters. We also know and welcome the fact that they undertake research with their audiences, including parents, some more formally than others, but would like to see this becoming a regular and routine activity across the whole industry. The industry needs to act on that research and other feedback from parents, and in the case of pre-watershed family viewing, take a slightly more cautious approach than is currently the case. Building the confidence of parents will mean broadcasters not only listening to their concerns but being seen to have listened and to have acted on what they heard. Connecting with parents and earning their trust will mean broadcasters not only complying with the letter of the Broadcasting Code, but also working proactively within its spirit.

> ## RECOMMENDATION
>
> **3.** **Ensuring the content of pre-watershed television programming better meets parents' expectations.** There are concerns among parents about the content of certain programmes shown before the watershed. The watershed was introduced to protect children, and pre-watershed programming should therefore be developed and regulated with a greater weight towards the attitudes and views of parents, rather than 'viewers' as a whole. In addition, broadcasters should involve parents on an ongoing basis in testing the standards by which family viewing on linear television is assessed and the Office of Communications (Ofcom) should extend its existing research into the views of parents on the watershed. Broadcasters and Ofcom should report annually on how they have specifically engaged parents over the previous year, what they have learnt and what they are doing differently as a result.
> *ACTION: Ofcom, broadcasters*

Sexualised content of music videos and music performances

32. Music videos were singled out by contributors to the Review for strong criticism, an issue that was also highlighted previously in the Papadopoulos report (Papadopoulos, 2010). Concerns focused on the sexual and violent nature of song lyrics; highly sexualised, verging on explicit, dance routines; and the stereotyped gender roles portrayed. Music videos were highlighted by some parents of boys who responded to our Call for Evidence: they expressed concern that these videos were influencing their sons' behaviour towards and perceptions of women and girls in a negative way.

"Whenever I have seen music videos lately I have been completely disheartened by the relentless portrayal of women as sex objects. More often than not they show young women in hardly any clothes ... basically simulating sex... For a lot of acts that are popular with young people, the music video has become a way of pushing boundaries to see how much they can get away with."

"Pop videos can be particularly difficult when children like the music, but the accompanying video is far too sexual."

Parents, Call for Evidence response

66 *With music videos... I have a battle on my hands with raising my son when it comes to respecting women and not to see them as sexual objects. He seems obsessed with how they look as opposed to their talents or abilities and this causes me concern.* 99

Parents, Call for Evidence response

66 *A disturbing thing for me is my daughter – she sees stuff on telly and thinks she has to look like that! It's the music videos for her... they're half naked – do they really need to do that to sell a song?* 99

66 *The music videos that children can watch are extremely explicit – from the clothes they wear to the words and actions. Some songs my 13 year old sings back are shocking.* 99

66 *Lots of songs contain inappropriate words and lots of sexual innuendo. My little girl loves listening to music and will copy the songs and moves without really understanding... with her friends she will often do shows for us and although usually sweet and funny, they sometimes worry me because they will be doing 'sexy dancing'... and I have to try and explain why I don't think it's OK.* 99

Parents, Review qualitative research

33. Music videos are currently exempt from classification under the Video Recordings Act 1984 and 2010 (VRA) which means that, unlike films, there is no restriction on children purchasing any but the most explicit of music videos. There are also no restrictions on children downloading music videos of any nature. As the British Board of Film Classification (BBFC) explains:

"*Under the [Video Recordings Act 1984 and 2010] certain video works are exempt from classification because back in 1984 they were considered to be unlikely to be harmful. These are video works concerned with sport, religion or music, or designed to inform, educate or instruct. The content of these exempt works has changed beyond recognition since 1984. This has meant that inappropriate and potentially harmful content in such works, including sexual content, is exempt from statutory classification, allowing it to be legally supplied to children ... [In our research (Goldstone & Slesenger, 2010)], 100 per cent of adults surveyed felt that potentially harmful content in videos, including music videos, which are presently exempt from classification, ought to be classified, and the classification decision enforced. Content*

freely availably to children and shown to respondents included topless lap dancing; strip tease routines; other sexualised breast nudity; and sexualised violence."

BBFC, Call for Evidence response

34. Although the VRA only applies to video works sold in hard copy, our view is that rating music videos in hard copy will have a beneficial knock-on effect to *all* methods of distributing music videos. We believe that once music videos are age rated in hard copy, media providers will be able to use that rating, in addition to the existing Broadcasting Code, to decide how and when to broadcast music videos or carry them on a website. It will also enable companies who display age guidance warnings and advice to reflect age-appropriateness of music videos in a way they cannot currently do. In addition, such age rating information may also help to ensure that parental controls on televisions, computers, phones and other devices start to filter music videos more effectively than at present.

RECOMMENDATION

4. **Introducing Age Rating for Music Videos.** Government should consult as a matter of priority on whether music videos should continue to be treated differently from other genres, and whether the exemption from the Video Recordings Act 1984 and 2010, which allows them to be sold without a rating or certificate, should be removed. As well as ensuring hard copy sales are only made on an age-appropriate basis, removal of the exemption would assist broadcasters and internet companies in ensuring that the content is made available responsibly. *ACTION: Government*

User-generated content on the internet

35. Generating their own content is one way that children and young people express themselves online. For example, Ofcom's 2011 UK Children's Media Literacy report (Ofcom, 2011(2)) showed that 80 per cent of the 12-15 year olds surveyed have set up a profile on a social networking site, and 61 per cent have uploaded photos to a website. However, others have expressed concern that user-generated content such as video clips can be uploaded to a video-sharing website by anyone and viewed by anyone (for example NSPCC, 2011). And some children are clearly unaware of the possible consequences of what they are doing when they create and upload their own content, and of the need to take privacy and issues of reputation seriously.

36. Whilst underage and inappropriate use of these services is against the terms and conditions of most sites, the sheer volume of content uploaded each day, and the fact that it is 'owned' by the user, means that many organisations are either reluctant to commit to removing it or do not have the resources to do so. Compared with text, it is much harder to filter video and audio automatically and this presents additional difficulties.

37. Prominent internet companies are working towards better self-regulation in this area as part of the work of the UK Council for Child Internet Safety (UKCCIS) and we hope that commitment to make serious change will soon be forthcoming. We understand that discussions at European level this summer will determine the direction that this work will take and we await developments with interest.

38. In addition, we believe that the role of education for children and young people around this issue is crucial. Schools, parenting organisations and some private sector organisations are already active here – both individually and collectively through UKCCIS – and there are some excellent programmes by, for example, the Child Exploitation and Online Protection Centre and Childnet, which teach children to think carefully about what they say and do online and to use a provider's privacy settings. We would like to see more support and advice for children in this area.

Access by children to age-restricted and adult material – through the internet and video-on-demand services

39. Serious concerns have been raised with us about what is seen as the ease of access to age-restricted and adult material on the internet and through video-on-demand services, some of which allow unchallenged free access to pornography. This is in line with Professor Tanya Byron's 2010 report which found that parents' "top digital concern is easy access to pornography and inappropriate adult content" (Byron, 2010).

40. The Review noted that there is some (but not nearly enough) good practice in place. For example, some television-on-demand sites age rate their content and offer a facility to block access to adult programmes.

Video-on-demand (VOD) is a system which allows users to select and watch programmes at any time the viewer wants through televisions, personal computers and internet-enabled devices. Depending on the VOD service they access, viewers can watch previously broadcast television programmes, films, or video works of any kind.

> 66*The internet and on-demand TV is my main concern, with children watching in their bedrooms. What is needed is a default setting for pornography, so that parents cannot leave it accessible by mistake.*99
>
> 66*I think it's far too easy to become exposed to unsuitable material on the internet.*99
>
> 66*My biggest concern is the internet which is also invading young people's mobile phones.*99
>
> **Parents, Call for Evidence response**

41. We believe that parents are aware of the need to mediate their children's usage of the internet, but they continue to be concerned that their children are particularly vulnerable when online (Figures 4 and 5).

Figure 4: Parental supervision of children's internet use

> One in eight internet users aged 5-7 (12 per cent) mostly use the internet on their own, rising to three in ten aged 8-11 (29 per cent) and over half of those aged 12-15 (56 per cent).
>
> Nearly one quarter (23 per cent) of 12-15s say they go online via a mobile phone. However, only one in five (21 per cent) of parents of 12-15s with such phones say that access to over-18 online material has been restricted.
>
> Just 37 per cent of parents of children who use the internet at home have any controls set or any software loaded to stop their child viewing certain types of website; 30 per cent say they use safe search settings.
>
> The majority of parents of children aged 5-15 (78 per cent) have rules in place about their child's internet use. Half of all parents of an 8-11 year old child (52 per cent) regularly check what their child is doing, but only 36 per cent of parents of a 5-7 year old and 34 per cent of parents of 12-15s.
>
> Around one in four parents of 5-15s (26 per cent) are concerned about the content of the websites their child visits.
>
> 23 per cent of parents think it likely that their child will experience something that bothers them online in the next six months.
>
> Source: Ofcom, 2011(2)

Figure 5: Children encountering sexual images online

> **>** 22 per cent of girls and 26 per cent of boys aged 9 – 16 report having encountered sexual images online or offline in the past 12 months.
>
> **>** 8 per cent of 11 – 16 year olds report that they have seen online sexual images including nudity.
>
> **>** 6 per cent have seen images of someone having sex.
>
> **>** 6 per cent have seen someone's genitals online.
>
> **>** 2 per cent say they have seen violent sexual images.
>
> **>** Among children who have seen online sexual images, 41 per cent of parents say their child has not seen such images, while 30 per cent recognise they have and 29 per cent say they don't know.
>
> Source: Livingstone, Haddon, Görzig and Ólafsson, 2010

42. Parents are, with schools, a key source of information on digital safety (Ofcom 2011(2)). The UKCCIS Click Clever, Click Safe code (Directgov (1)) was set up to be an effective and popular way for both parents and children to remember a set of simple online behaviours – "Zip It, Block It, Flag It" – to help avoid common risks online. It is to be hoped that funding will continue to be found to support and promote this excellent initiative.

43. Opinions are divided about the robustness of existing academic evidence that exposure of children to pornography directly causes harm, although Papadopoulos is strongly of the view that it is detrimental to young people's development (Papadopoulos, 2010; see also Flood, 2009). However, many contributors to the Review, including child protection organisations, schools, local authorities, child psychologists, youth workers, agony aunts, women's organisations and internet safety organisations amongst others, provided compelling examples to illustrate their concern that pornography has a negative impact on children and young people. For example, children became convinced that they had to behave and look like the on-screen participants in order to have 'proper' sex; which generally meant sex without any basis in love or display of affection or equality; and to conform physically to some very narrow gender stereotypes. And since research does show that people convicted of serious crimes of violence and sexual violence often have a history of using pornography (Papadopoulos, 2010), many respondents advocate a common sense approach to accept the potential for real harm to be caused to children by the ready access to such material. We accept this as a persuasive argument for strong measures to be taken.

44.   Parental controls that might restrict children's access to adult content already exist on many internet-enabled devices. But whilst many provide a reasonable level of protection, they cannot be completely effective and in many instances can be bypassed relatively easily. However, industry experts we spoke to during this Review told us they believe parental controls are an effective way to prevent accidental access to harmful content and consider that the better products on the market can withstand reasonable attempts at disabling them.

45.   Following concerns that there was variation in the quality of parental controls, the BSI PAS74 Kitemark scheme was set up to identify those products that performed to the required safety standard. Despite endorsement by Professor Tanya Byron of this initiative (Byron, 2008), to date there is only one product that has achieved accreditation: we would like to see greater adoption of this scheme by industry.

46.   We see filters as a hugely important tool and we would like to see manufacturers, retailers, internet service providers (ISPs) and others adopt an approach that is much more supportive of parents. Industry already does much to help educate parents about parental controls, age-restriction and content filters. Such initiatives are extremely worthwhile, and should continue. However, it is not acceptable to expect parents to be solely responsible for what their children see online, and industry must take greater responsibility for controlling access to adult material online in the same way as they do when providing this sort of content through other channels, such as cinema, television, DVDs or adult magazines. We believe that there is no logical reason for not bringing internet-enabled devices into line with other platforms in order to protect children from inappropriate material.

47.   There has been much discussion about whether or not filters should be activated by default, with users only being able to access adult material if they take the trouble to remove the filters. We note, however, that Professor Tanya Byron concluded that this "could lull some parents into a false sense of security…[as they would] need do nothing more to help their children go online safely" (Byron, 2008). But we are also aware that Professor Byron recommended that the Government should consider a requirement for content filters on new home computers to be switched on by default if other approaches were failing to have an impact on the number and frequency of children coming across harmful or inappropriate content.

48.   We believe that it is now time for a new approach. Specifically, we would like to see industry agreeing across the board that when a new device or service is purchased or contract entered into, customers would be asked to make an active choice about whether filters should be switched off or on: they would be given the opportunity to choose to activate the solution immediately, whether it be network-level filtering by an ISP or pre-installed software on a new laptop. We believe that this will substantially increase the take-up and awareness of these tools and, consequently, reduce the amount of online adult material accessed by children.

49. However, given that filters are not completely effective, we would still want parents to be actively responsible for the safety of their children and take an ongoing interest in their use of the internet.

50. Age verification online is an allied issue. We know that current online age-verification methods offer scant control or protection. The fact that we do not have a national identity system in the UK is sometimes offered as a reason why age verification cannot be improved. However, we note that age verification has to be in place in non-internet environments by law (for example, the sale of pornography on DVD) and if we as a society are saying that the supply of adult material needs control, then that control should operate across all outlets, irrespective of the ease of checking the buyer's age.

51. Some internet companies are already tightening their own age control systems voluntarily and we feel strongly that the industry has the wherewithal to find a solution. The work being initiated by UKCCIS on both age verification and parental controls is positive. This work should proceed without delay, and must involve parents to ensure a proper understanding of the issues and to develop an optimal solution. However, if voluntary action is not forthcoming quickly then Government should consider regulation (for example, as part of the planned Communications Bill), however problematic that might be.

RECOMMENDATION

5. **Making it easier for parents to block adult and age-restricted material from the internet.** To provide a consistent level of protection across all media, as a matter of urgency, the internet industry should ensure that customers must make an active choice over what sort of content they want to allow their children to access. To facilitate this, the internet industry must act decisively to develop and introduce effective parental controls, with Government regulation if voluntary action is not forthcoming within a reasonable timescale. In addition, those providing content which is age-restricted, whether by law or company policy, should seek robust means of age verification as well as making it easy for parents to block underage access. *ACTION: Internet industry and providers of age-restricted content, through the UK Council for Child Internet Safety (UKCCIS)*

Clothing, Products and Services for Children

> **Designers and providers need to be challenged to consider what they are doing to children. Sex is an easy sell.**
>
> Parent, Call for Evidence response

Overview

> Sexualised and gender-stereotyped clothing, products and services for children are the biggest areas of concern for parents and many non-commercial organisations contributing to the Review, with interest fanned by a sometimes prurient press.

> The issues are rarely clear-cut, with a fine balance on a number of points – taste, preference, choice, affordability, fashion and gender preferences.

> Retailers are aware of the issues and sensitivities and are responding. They need to be explicitly and systematically family friendly, from design and buying through to display and marketing.

WHAT WE WOULD LIKE TO SEE

That retailers do not sell or market inappropriate clothing, products or services for children.

RECOMMENDATION

6. **Developing a retail code of good practice on retailing to children.** Retailers, alongside their trade associations, should develop and comply with a voluntary code of good practice for all aspects of retailing to children. The British Retail Consortium (BRC) should continue its work in this area as a matter of urgency and encourage non-BRC members to sign up to its code. *ACTION: Retailers and retail associations, including the BRC*

Introduction

1. As set out in Theme 1, we all (adults and children, parents and non-parents) live in a world that has become increasingly sexualised. Sexual images form a wallpaper to our lives, all-pervasive but hardly noticed. This background affects adults as well as children and is everywhere in society.

2. Since the commercial world is not immune from, and indeed often invests in, the notion that 'sex sells', it is perhaps not surprising to find research evidence that parents, including those who took part in the qualitative research for this Review and our Call for Evidence, see a reflection of this sexualisation in some children's clothes, toys and games and other services for children.

3.	Among the parents who voiced concerns about the commercialisation and sexualisation of childhood when they responded to our Call for Evidence, the sexualisation of clothes and products for children was a big concern. We recognise this is a highly subjective issue, intimately bound up with notions such as good and bad taste, personal preferences and the ability to exercise choice, the enjoyment by parents and children of fashion, and the expression of innate or learned gender differences. We also recognise that children's clothes, products and services are bought mainly by parents, and that what some parents find appropriate, others find distasteful or even offensive.

4.	Manufacturers and retailers therefore have to tread a difficult path in deciding where the line of public taste and approval lies. But retailers cannot be passive reflectors in children's products of adult fashion, or simply adopt an attitude of 'if customers don't like something they won't buy it'. They want to build the trust of customers so that they can maintain a long-lasting relationship with them. Retailers are aware of parents' concerns and do respond to them but what we heard from retailers suggests they could be more systematic in their approach. As with other business sectors, retailers need to be helping to build a family-friendly public space throughout their business practices, from the design and sourcing of goods through displays and marketing and in the way they listen and respond to customer feedback.

5.	The concerns that parents expressed about the sexualisation of products for children when they responded to our Call for Evidence fall into two broad areas.

6.	The first area of concern was about products that are seen to depend on, or to promote, the idea that children at quite a young age are more sexually mature than their chronological age suggests. That maturity might be physical, emotional or psychological, and the child may be aware or unaware of it. Girls' clothes and accessories are the most frequently cited examples: bras (padded or not), bikinis, short skirts, high-heeled shoes, garments with suggestive slogans, or the use of fabrics and designs that have connotations of adult sexuality.

7.	The second area of concern was about the use of gender stereotypes. The commercial world is seen to offer only very narrow concepts of what it means to be a boy or a girl and what kind of accessories boys and girls need in order to fulfil those gender roles. This is demonstrated through colour (pink, for girls, blue or camouflage for boys), clothes ranges (ultra-feminine clothes for girls, sportswear for boys), and toys and games (dolls, cuddly animals, make-up kits, fashion accessories for girls; cars, action figures, guns for boys).

8.	To inform this debate, it is important to understand the normal physical and sexual development of children and young people, which we explore below.

9.	We also examine the role of retailers in bringing products to market and their handling of sexualised and gendered products. We acknowledge the view of Professor Buckingham and his colleagues in their assessment that:

"Marketers clearly do not create gender role differences: the question is whether they respond to these differences in ways that, on balance, reinforce them."

DCSF/DCMS, 2009

Child development and sexual maturity

10. The parents who contributed to the Review clearly wanted their own children to have the space and time to grow and develop mentally, physically and emotionally as individuals, learning how to navigate the world at their own pace and in their own unique way. We found a commonly-held view among respondents that sexualisation accelerates that process in a way that parents do not like, and that some parents worry could be harmful.

It's gonna make her grow up too fast, walking around thinking she's a little teenager. She ain't, she's a little girl and I want her to dress like a little girl.

There's a concern about them knowing too much at their age. You want to protect their innocence.

She wants to wear make-up and short skirts because she wants to look like [a celebrity] but it's too much. It's not innocent – well it is, but it might look provoking to the wrong people.

Parents, Review qualitative research

I think it [sexualisation] has a massive influence on how they grow up… It's quite disturbing.

Parent, Call for Evidence response

11. These are certainly not new concerns on the part of parents and it is important to view this aspect of the debate in a wider social and historical context. The report of the independent assessment led by Professor Buckingham offers a comprehensive analysis of this wider context, and particularly highlights the role that nostalgia plays in parental and societal views of childhood:

"There is a very dominant strain of nostalgia here – a looking back to a 'golden age' when childhood and family life were apparently harmonious, stable and well adjusted. But it is often far from clear when that time was, or the social groups to whom this description applies; and the basis on which historical comparisons are being made is frequently unclear. Historical studies of childhood certainly give good grounds for questioning whether such a 'golden age' has ever existed."

DCSF/DCMS, 2009

12. Since most attention is paid to the sexualisation of clothes for girls, it is important to be especially aware of girls' physical development. Girls are, on average, reaching puberty at an earlier age now than ever before. In the UK, girls can now expect to reach puberty, defined as the development of breast buds, around their tenth birthday, and, on average, girls have developed more evident breasts by 11.6 years of age. That means that today these developmental stages are reached a year to 18 months sooner than at any time over the past 60 years (Rubin et al, 2009).

13. We need to see concerns about the premature sexualisation of children through inappropriate clothing and other products against this backdrop. Professor David Buckingham, in a book to be published in 2011, considers the issue of whether, as well as society being increasingly sexualised, this lowering of the age at which children reach physical and sexual maturity provides a biological driver towards them seeing their potential as sexual beings at a younger age (Phoenix, 2011).

Sexualised products

14. Parents responding to our Call for Evidence told us that they felt that retailers could do more to offer age-appropriate ranges of clothes. They said that they preferred children's clothes to be clearly age-appropriate and not simply scaled-down versions of adult fashion. Figure 6 shows findings from the omnibus survey about views on clothes for children.

Figure 6: Views on clothing styles for children

> 55 per cent of parents surveyed thought that adult style clothes for children in shops encourage children to act older than they are.

> 45 per cent of parents surveyed thought that adult-style clothes for children put pressure on children to conform to a particular body shape and size.

> 48 per cent of the children surveyed agreed with the statement 'It's difficult to find clothes in the shops that I like and that my parents would allow me to wear'.

Source: TNS Omnibus Survey, 2011

15. Objections by parents in the Call for Evidence to the scaling down of adult styles often related to elements of design with close associations to adult sexuality, such as short skirts, shoes with heels, the use of suggestive slogans, 'adult' or sex industry branding, black lace, diamanté, animal prints and low necklines. We can see how such design details could be found inappropriate. All the retailers we spoke to during the course of the Review were aware of such sensitivities and usually very deliberately steered away from including such details in their own ranges.

16. Throughout the Review, by far the most contentious issue where clothing is concerned has been the availability of bras and bikini-style swimwear for under 16s. This issue has been taken up by the media, and there have been a number of newspaper articles in recent months criticising such products (for example Lazzeri and Spanton, 2011; Hamilton, 2010). In some cases, it is aspects of design that have been criticised, but sometimes the issue of design has been conflated with a question around whether such products should exist at all. These stories often sensationalise the issue, fanning a prurient interest in cases where a sexual dimension can be put into a headline.

> *In many high street shops clothes for young girls are merely mini versions of adult clothes. Almost everything is pink and glittery or has inappropriate slogans such as 'WAG in the making', 'Gorgeous', 'Princess' etc.*

> *I find it strange when children's clothes are so 'grown-up' and in many shops I could buy items for my daughter that I could wear myself!*

Parents, Call for Evidence response

17. We would prefer to see a more measured approach. Common sense tells us that under 16s are bound to need swimwear and bras at some stage during their childhood. As the Department for Education's Children and Youth Board sensibly commented in their response to our Call for Evidence:

"The Board felt that bikinis for children wasn't the problem, but that bikinis have become sexualised by the media, e.g. models posing in newspapers in bikinis."

Department for Education's Children and Youth Board

18. We, therefore, have some sympathy with manufacturers and retailers of such clothing items as they are often in a difficult situation: they want to supply the perfectly normal and reasonable demand of parents and young people for such products, but in so doing risk often unreasonable criticism.

19. During the Review, we spent a lot of time talking with retailers about the sale of bras and swimwear for children, and were reassured that businesses are generally applying common sense when designing and selling these items.

CASE STUDY: THE DESIGN AND RETAIL OF FIRST AND TRAINER BRAS

Children develop at different ages and rates. In the UK, girls can now expect to reach puberty around their tenth birthday, and there are some who will need a first bra before then.

Shops selling first and trainer bras may locate these either in the childrenswear section or in the lingerie section, depending on factors such as shop size and layout and customer preference. First and trainer bras can be labelled in two ways – either according to age or using the chest and cup sizing used for adult bras.

The design of first and trainer bras is usually quite plain, for example bras are often white or in plain cotton fabrics, perhaps lightly decorated. First and trainer bras may well have lightly moulded foam cups. Newspaper coverage has sometimes described this as 'padding' but it is not designed to enhance the wearer's bust: customer feedback shows that young wearers feel more comfortable with a bra that offers support and modesty.

Source: Clothing retailers who contributed to our Call for Evidence

20. The retailers of children's clothes we spoke to all have some form of checking process in place to 'edit out' suggestions of sexualisation from children's clothing. Some companies have written guidelines for buyers, others provide induction and training in company values. All the companies we spoke to depend, to a greater or lesser extent, on the fact that many of their designers, buyers and managers are themselves parents who bring their own 'family values' to bear in design and retailing judgements, and all claimed to pay relentless attention to the feedback they get from customers.

CASE STUDY: GEORGE DESIGN – PARROT T-SHIRT

"George at Asda created an original design for a girls t-shirt with a parrot theme. This initially featured a drawing of a parrot and the wording of the familiar phrase 'who's a pretty girl?' However, in the internal George process of reviewing designs it was decided that the wording could perhaps be misconstrued by some people. To ensure that the product was completely appropriate, the product was redesigned. The final product for customers features the drawing of a parrot but notthe wording. This is example of how George uses its internal design and feedback process, from colleagues and customer focus groups, to refine products so that they are just right for the wearer."

Source: George at Asda

CASE STUDY: STYLE OF PHOTOGRAPHY

"Following feedback from our customers that the girl models used in our promotional photography looked too grown up and sophisticated, we reviewed and made changes to our internal guidelines for the styling and photography of our childrenswear. These changes included reducing the age of the girl models from 12 years old to 10 years old; moving away from posed studio shots to more fun, lifestyle shots in a natural environment and changing what could be perceived as grown up 'sultry' expressions to happy smiling children."

Source: High street retailer contributing to the Review

21. As a result, we found that the retailers contributing to the Review are careful to avoid stocking children's garments with suggestive slogans. If an adult fashion trend was seen as sexualised, such as the use of sheer materials or lace, when the trend was translated into children's clothes it is often done through designs that nod towards the adult fashion rather than by simply scaling down the clothes into children's sizes. For example, one retailer translated the adult fashion for lace leggings into opaque leggings with a lacy pattern printed on to them for their children's range. Some respondents to the Call for Evidence thought that retailers had responded in this way because of previous negative publicity.

22. We have been surprised, however, by how few retailers seem to have formal, structured processes in place for checking or challenging their own design and purchasing decisions or for capturing the views of parents in a systematic way. The majority rely on the taste and experience of their buyers and managers and invoke a company ethos of knowing that they need to focus on what their customers want. We would, however, like to see a more thorough and transparent 'best practice' approach to this issue, which retailers can publicly adopt. We believe that this would not only help businesses to avoid selling inappropriate items but also would demonstrate that businesses take parents' concerns seriously and were taking steps to address them.

Shop window and in-store displays

23. Some parents have raised concerns about sexualised imagery in window displays, such as displays of lingerie and explicitly sexualised clothing, the use of mannequins posed in sexually suggestive ways, or sexualised photography or images used as the backdrop to a window display. Parents have also been concerned about the display of children's goods alongside adult goods. Most often this concerns girls' underwear or swimwear (Buckingham, Willett, Bragg and Russell, 2010). Here there is an implied sexualisation

by association: if the garment is 'sexy' for an adult then the similar garments nearby must be being marketed as sexy for children.

24. The retailers we spoke to, without exception, have a policy for locating childrenswear in wholly separate areas from womenswear. In some instances the policy would put the two sections on separate floors of the building if that is possible. Many companies provide store managers with pictures of ideal displays and floor layouts that they can adapt to local circumstances.

> *The problem is that when you are 'out and about' with kids, things aren't neatly compartmentalised – so clothes shops, music shops, games shops etc sell things aimed at say 9-12 year olds alongside adult products.*
>
> **Parents, Call for Evidence response**

25. However, retailers accepted that, given the vagaries of building design and the human judgement involved, they could not guarantee this on every occasion. There are also policy differences between retailers on what customers find most helpful when looking for first bras: some take the view that bras, regardless of the age of the wearer, should always be displayed in the womenswear section, while others place first bras for younger girls in childrenswear and first bras for slightly built teenagers in womenswear.

Gender stereotyping

26. Some parents contributing to the Review expressed concern at the highly gendered nature of products other than clothes for girls and boys. There is often an overlap between the toys of a highly gendered nature and, especially for girls, a sexualised content (for example, certain fashion dolls). Girls' products are predominantly pink, while there is a broader palate of colour for boys' clothes and toys. We have heard concern from some parents about the sale of make-up kits for young children, although it is not clear whether the concern stems from worries about sexualisation or gender stereotyping from an early age.

27. In fact, the previous assessment of the impact of the commercial world on children (DCSF/DCMS, 2009) found no strong evidence that gender stereotyping in marketing or products influences children's behaviour significantly, relative to other factors. That report also noted that concerns regarding gender stereotyping in the marketing and design of products for young children beg the question of whether gender stereotypes formed in early age are lasting, and in fact whether they might be developmentally necessary at that particular stage. The assessment goes on to highlight sociological research that suggests that the

relationship between gender and consumer culture is more complex, and less easily understood in terms of simple 'cause and effect'.

28. The Review heard from retailers that the market for children's toys is a global one and that there is not a wide range of products for retailers to choose between. They suggested that they had little alternative other than to stock what will sell well, and that, indeed, customers looked for clear signals as to whether an item was intended for a boy or a girl. The Review heard consistently that retailers stocked pink items because they knew there was demand for them, and that if other colours were popular they would stock items in those colours too. But we also note that the 'pink for girls' approach can have a positive side (see Case Study).

CASE STUDY: PRODUCT PACKAGING

"In 2006, we used to sell our 'Bath Bomb' product in blue packaging, thinking that would give it a unisex appeal, and so increase our market potential. We were selling at a rate of 15,000 sets per annum. The product is legally defined as a 'chemical experimentation set' but, unfortunately, 'science' still appeals to boys more than girls. Once we changed to predominantly pink packaging and marketed it as a craft activity, we were shocked to see consistent sales of 80,000 to 120,000 sets per annum ever since! Experience has taught us that the success or otherwise of a toy depends largely on the pack design communicating quickly to the consumer whether a toy is best suited to boys or to girls."

Source: Bob Paton, Interplay UK, Toy Manufacturer

29. There is a popularly held view that girls and boys play with stereotypical toys because they learn to see this as appropriate for their sex. This is contested territory: others argue there is greater evidence now of there being innate gender differences so that a desire to play with one kind of toy over another is at least as much about biological drivers as with socialisation and has to do with a normal, healthy development of gender identity (Buckingham, Willett, Bragg and Russell, 2010). What is not in doubt is that the commercial world provides plenty of reinforcement of gender stereotypes and is likely to do so for as long as there is customer demand.

What is already happening

30. As well as talking to individual companies in the course of this Review we also spoke to the British Retail Consortium (BRC), a leading trade association for the retail sector. BRC members account for around three quarters of the UK retail market by sales. The BRC has shown a welcome appreciation of the concerns of parents and of how responsible retailers could respond.

31. The BRC is now working with its members to produce a set of good practice guidelines on the responsible retailing of children's clothes. We consider this to be a significant move in the right direction and a clear example of how industry can respond positively and voluntarily to public feeling, and we would like to see this published as soon as possible.

32. Whilst these guidelines have been created by and for BRC members we would like to see other retailers, including well known high street fashion chains, make a similar commitment.
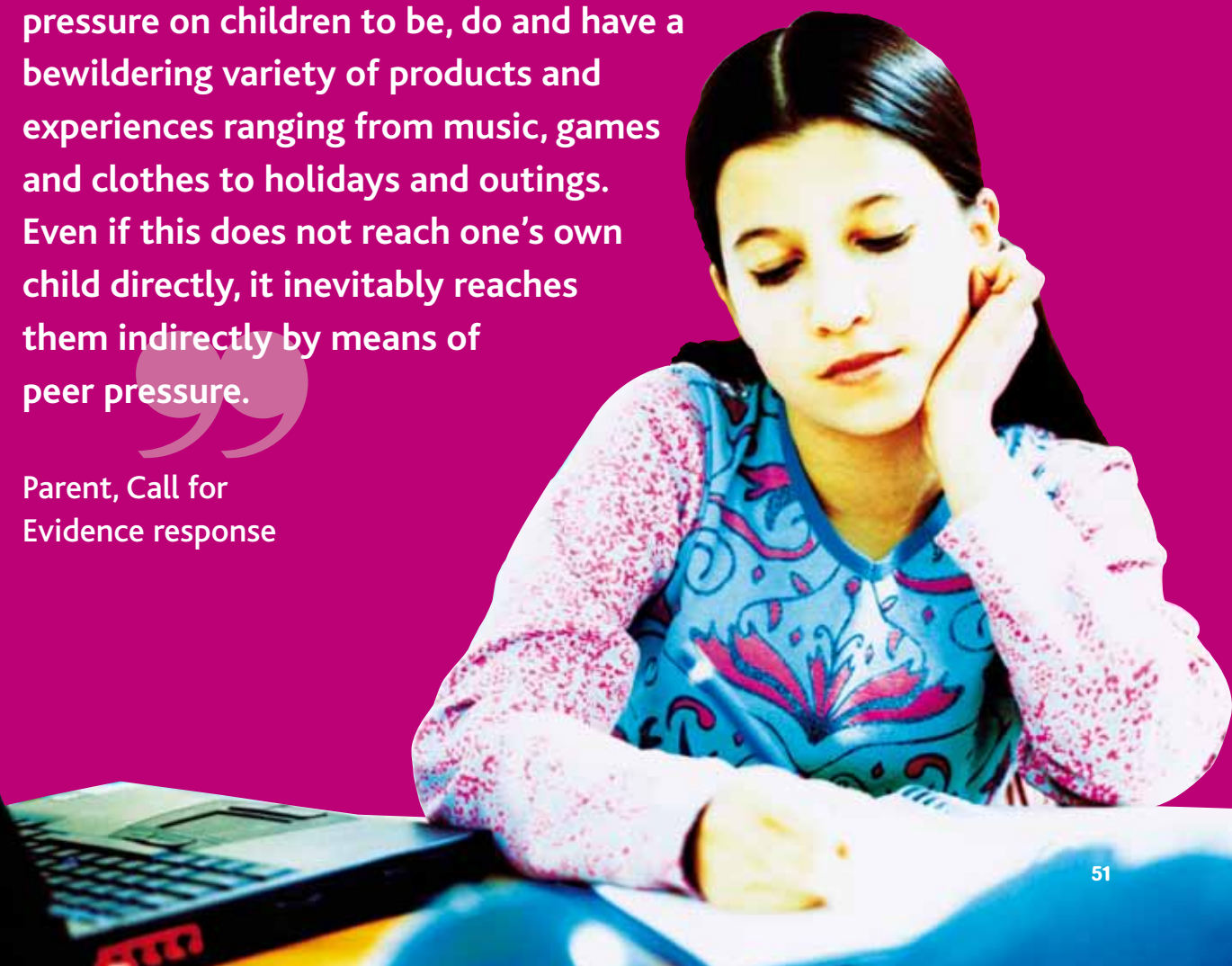
> ## RECOMMENDATION
>
> **6.** **Developing a retail code of good practice on retailing to children.** Retailers, alongside their trade associations, should develop and comply with a voluntary code of good practice for all aspects of retailing to children. The British Retail Consortium (BRC) should continue its work in this area as a matter of urgency and encourage non-BRC members to sign up to its code. *ACTION: Retailers and retail associations, including the BRC*

Children as Consumers

> " ... a parent's job is made considerably more difficult by the constant bombardment of advertising and the pressure on children to be, do and have a bewildering variety of products and experiences ranging from music, games and clothes to holidays and outings. Even if this does not reach one's own child directly, it inevitably reaches them indirectly by means of peer pressure. "

Parent, Call for Evidence response

Overview

> We all live in a commercial world and children are under pressure from a range of sources to act as consumers.

> We do not want to cut children off from the commercial world completely as we believe that it brings benefits and parents tell us that they want to manage the issue themselves, supported by proportionate regulation and responsible businesses.

> While adults may understand that companies might look to 'push the boundaries' when advertising to them, children are especially vulnerable and need to be given special consideration.

> Special measures already exist in advertising and marketing regulations to protect children but some gaps exist.

> Regulators cannot realistically be expected to anticipate detailed developments in the new media. However, an absence of regulation does not absolve businesses from acting responsibly by themselves.

WHAT WE WOULD LIKE TO SEE

That the regulations protecting children from excessive commercial pressures are comprehensive, effective across all media and in line with parental expectations.

That marketers do not attempt to exploit any gaps in advertising regulation in order to unduly influence the choices children make as consumers.

That parents and children have a sound awareness and understanding of marketing techniques and regulation.

RECOMMENDATIONS

7. **Ensuring that the regulation of advertising reflects more closely parents' and children's views.** The Advertising Standards Authority (ASA) should conduct research with parents and children on a regular basis in order to gauge their views on the ASA's approach to regulation and on the ASA's decisions, publishing the results and subsequent action taken in their annual report. *ACTION: ASA*

8. **Prohibiting the employment of children as brand ambassadors and in peer-to-peer marketing.** The Committee of Advertising Practice and other advertising and marketing bodies should urgently explore whether, as many parents believe, the advertising self-regulatory codes should prohibit the employment of children under the age of 16 as brand ambassadors or in peer-to-peer marketing – where people are paid, or paid in kind, to promote products, brands or services. *ACTION: Committee of Advertising Practice, the Advertising Association and relevant regulators*

9. **Defining a child as under the age of 16 in all types of advertising regulation.** The ASA should conduct research with parents, children and young people to determine whether the ASA should always define a child as a person under the age of 16, in line with the Committee of Advertising Practice and Broadcast Committee of Advertising Practice codes. *ACTION: ASA*

10. **Raising parental awareness of marketing and advertising techniques.** Industry and regulators should work together to improve parental awareness of marketing and advertising techniques and of advertising regulation and complaints processes and to promote industry best practice. *ACTION: Advertising and marketing industry, with the ASA and the Advertising Association*

11. **Quality assurance for media and commercial literacy resources and education for children.** These resources should always include education to help children develop their emotional resilience to the commercial and sexual pressures that today's world places on them. Providers should commission independent evaluation of their provision, not solely measuring take-up but, crucially, to assess its effectiveness. Those bodies with responsibilities for promoting media literacy, including Ofcom and the BBC, should encourage the development of minimum standards guidance for the content of media and commercial literacy education and resources to children. *ACTION: Media and commercial literacy providers, with Ofcom and the BBC*

Introduction

1. The commercial world is an inextricable part of our lives and our society. The complexity of the relationship between that world and childhood is well documented in the 2009 assessment for Government of the impact of the commercial world on children's wellbeing. The commercial world is valued for the benefits and opportunities it offers, but parents and parenting organisations express concerns regarding the pressure it is seen to exert (DCSF/DCMS, 2009; Phoenix, 2011).

2. There is evidence that society is becoming increasingly commercialised (DCSF/DCMS, 2009; Phoenix, 2011). The market for goods and services for children is large and growing – estimated to be in the order of £100 billion a year if childcare and education is included – and there is some evidence that children's influence on family spending is increasing, as well as their own spending power (DCSF/DCMS, 2009). It is not surprising then if companies choose to appeal directly to children as consumers (Marketing magazine, 2011).

3. From an early age, children are able to recognise the names of familiar people and objects as part of their normal development. It is therefore to be expected that if they repeatedly see a brand logo or hear its name they will be able to recognise and name it, especially the brands of companies popular with their family. Research in the Netherlands showed that 2 and 3 year-olds could recognise eight out of the 12 brands shown to them (Valkenburg and Buijzen, 2005). This means that even companies not overtly marketing to children can benefit from having their brands prominently displayed and easily recognised by the potential customers of the future.

4. Children are also living increasingly 'media-saturated' lives, inevitably being exposed to an increasing volume of advertising and marketing as they watch television, go online, use mobile phones and smart phones, or play video games (see Figure 7).

Figure 7: Commercial Media Clock of a school day, ages 5-16 (self-reported)
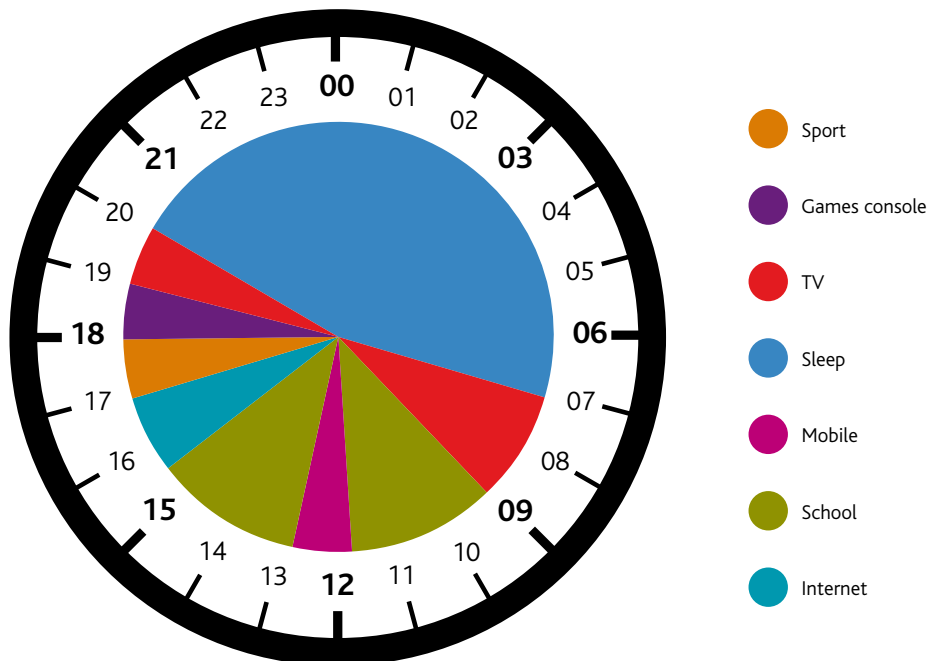
Source: Childwise

Source: Childwise, the Monitor Report 2010-11, Children's media use and purchasing. (Reproduced in Advertising Association, 2011)

5. Against this backdrop, the concerns of parents and others we heard from during this Review included:

    > social pressures on parents, peer pressure and 'pester power', as well as the volume of advertising and marketing;

    > the effectiveness of current advertising regulation;

    > inappropriate advertising aimed at (or seen by) children; and

    > 'new' marketing techniques (especially those that use new technology).

Pressure to consume: peers, 'pester power' and parents

6. Together with the marketing of brands as well as products, and the volume of merchandising accompanying popular television, film and book characters, parents are concerned that commercial practices contribute to a "layering" effect that can be overwhelming and which they fear is having a negative impact on family life.

7. Children are increasingly using the internet (Ofcom, 2011(2)) and in doing so are exposed to a significant volume of marketing messages as social networking sites and other sites popular with children become increasingly commercialised and companies spend more on online advertising. UK internet advertising grew 12.8 per cent in 2010, with the biggest gain being in display advertising, which grew by more than a quarter (27.5 per cent) to £945.1 million, including a nearly 200 per cent surge in display advertising in a social media environment (Internet Advertising Bureau, 2011).

> ❝*It is the cacophony of advertising messages everywhere that make it hard to escape.*❞
>
> **Parent, Call for Evidence response**

8. In addition, alongside the development of integrated marketing strategies across the range of media channels, advertising and marketing techniques are increasingly sophisticated and often hard to distinguish from content: even older children find it hard to say whether advergames, for example, are designed to entertain or to persuade (Fielder, Gardener, Nairn and Pitt, 2008).

9. It must be the case, then, that children are under more pressure from advertisers and marketers to consume than they have been in the past.

10. However, some of this pressure is felt by children and parents more indirectly in the form of social pressure to conform to certain norms. Alongside factors such as value for money, educational qualities, and the longer-term potential for enjoyment and use of particular products, previous research (Phoenix, 2011), our Call for Evidence and our qualitative

research suggest that key motivations for parents to buy non-essential items for their children are the desire to be seen by other parents as a good provider and for their children to have the same things and opportunities as their peers, or to prevent them from being teased or bullied.

> *I feel pressure from other parents, like – that parent's done it, why haven't I and should I do it?*

> *Sometimes if I'm at work and I'm feeling guilty because I'm at work… Then I might buy something. I'm guilty of purchasing things because of that.*

Parents, Review qualitative research

> *My eldest's school shoes and coat were bought out of us worrying that he may be bullied if it wasn't the right look.*

> *The problem is that parents sometimes feel the peer pressure too and often feel almost forced to buy certain products because other parents are. They feel like bad parents if they don't.*

Parents, Call for Evidence response

11. It is also clear that the persistence with which children ask for things is another influence (Phoenix, 2011). Children and young people freely acknowledge their use of 'pester power':

> Nearly a third (32 per cent) of children in the omnibus survey for the Review say that if they really want something and they know their parents do not want them to buy it, they will always keep on asking until their parents let them have it. More than half (52 per cent) say they sometimes do this and only 15 per cent said they never do (Figure 8).

> Over three quarters of children and young people who responded to a survey run by the Children and Young People's Advisory Group of the Office of the Children's Commissioner (Children's Commissioner and Amplify, 2011) thought that children and young people put pressure on their parents to buy things for them.

Figure 8: Children's use of 'pester power' (self-reported)

If you really want something and you know your parents don't want you to buy it, do you ever keep on asking for it until they let you have it?
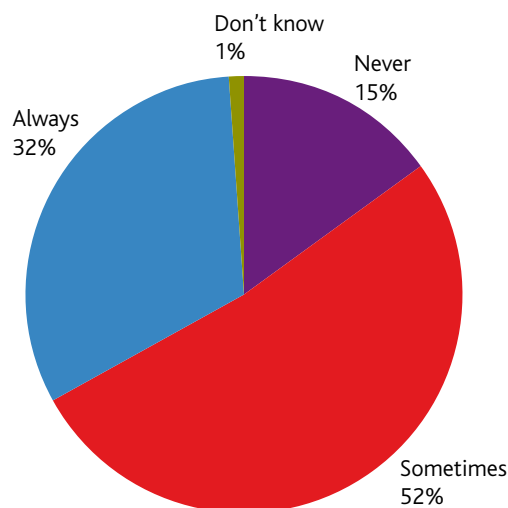
Source: TNS Omnibus Survey, 2011
Weighted base: 520 children aged 7-16 in Great Britain

12. Children in their turn are influenced by their friends and what is popular at school: the large majority of the children and young people in the Office of the Children's Commissioner for England's survey thought that children and young people are under pressure to own certain items. Most said that it was because they wanted to fit in, look cool, because of peer pressure or to not feel alone, and some said it was to avoid the risk of bullying or people making comments (Children's Commissioner and Amplify, 2011). In the omnibus survey for this Review, children ranked their friends having or liking something second only to price in a list of factors influencing their buying decisions. And 57 per cent of children surveyed said that they had bought or asked their parents to buy them something just so that they would be the same as their friends.

> *If you don't have something other young people will make fun out of you or you feel left out when everyone else is using it.*
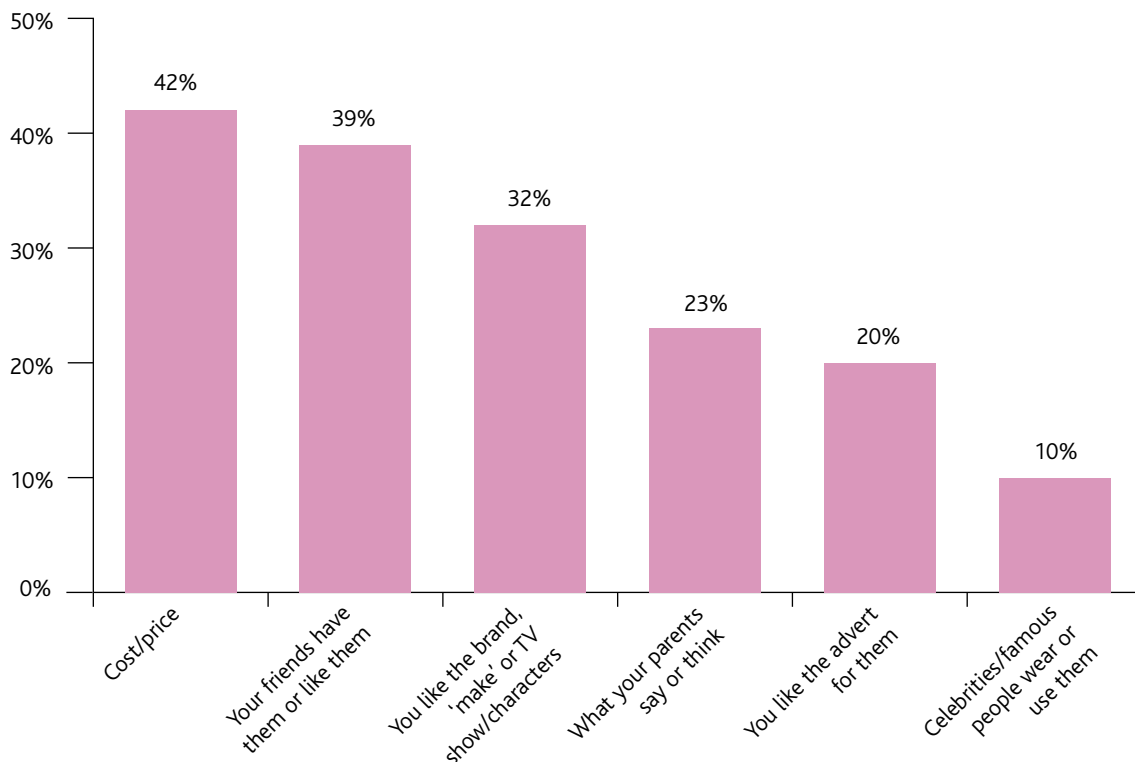
> *People want to fit in with their friends and don't want to feel left out.*

Young people, Office of the Children's Commissioner for England survey

Figure 9: Factors influencing children's choice of clothes, toys and gadgets

Thinking about when you go shopping for clothes, toys or gadgets, which of the following things help you decide which ones to choose?

Source: TNS Omnibus Survey, 2011
Weighted base: 520 children aged 7-16 in Great Britain

13. This echoes the views of children taking part in focus groups as part of the research for a report to the Scottish Parliament, who considered peer pressure to be much greater than pressure from stores or manufacturers or through images of celebrities:

"Both for boys and girls, having the 'right stuff' – in the form of branded goods, with labels and logos clearly displayed – was critically important in terms of self-image and peer group status."

Buckingham, Willett, Bragg, and Russell, 2010

14. So children are undoubtedly under a great deal of pressure to consume. But the parents we heard from clearly feel that it is up to them, with support from other parents, to resist, and to help their children resist, these sorts of pressures, and to say 'no'.

> 66 *Whilst talking about this to parents, many have said they buy things in order for their children not to feel left out. I feel that many parents would like to know what other parents do in these situations.* 99

> 66 *I do often check in with other parents as to what they are being asked for and what boundaries they are willing to enforce.* 99

> 66 *You have a choice as a parent, as an adult. If you don't like it, don't let them (have it).* 99

Parents, Call for Evidence response

15. However, they also feel that this would be easier if businesses were more responsible towards children and more parent-friendly to begin with. These feelings find an organised expression in campaigns such as the Bye Buy Childhood (Mothers' Union, 2010), Let Girls Be Girls (Mumsnet(2)) and others, but were also brought out by parents' evidence for this Review.

> 66 *I am still old fashioned enough to think that the primary responsibility for the actual purchases remains with the parents who can just say no. But others can make the pester power less powerful.* 99

Parent, Call for Evidence response

> 66 *The advertisers say they don't target children, but they do.* 99

Parents, Review qualitative research

> 66 *Parents do say no. They say no, you can't stay up late. No, you can't eat pudding before your main course. No, you can't have a dog. Setting boundaries is what parents do. It's tough sometimes… and I need to ask if the advertising industry are comfortable spending millions of pounds targeting children direct and then saying it's down to mum and dad to stand up to them?* 99

Parent, quoted in Keep, 2004

16. Research commissioned by Credos found that advertising and marketing was expressed as a concern by 43 per cent of parents, in the bottom third of a list of 14 issues, and that there is an assumption amongst parents that advertising to children is well-regulated, is fairly mild and reflects society (Advertising Association, 2011). Other Credos research also suggests that further information on regulatory protections and the benefits of advertising (for instance, that it funds many 'free-to-use' services such as social networking sites and commercial television programmes, and that children value the information on new products) tends to mitigate concerns (Credos, 2011).

17. Our qualitative research with parents also found that, on the whole, provided there are effective provisions in advertising regulation to protect children, as discussed below, the benefits of advertising and marketing to children outweigh perceived risks and harms (Define, 2011).

> "We know they have to work by certain standards and rules, [advertising] doesn't bother us too much – there won't be a kid with a cigarette in her hand. So knowing there are those rules and standards makes you worry less about it."
>
> **Parent, Review qualitative research**

Effectiveness of existing advertising regulation

18. The system of advertising regulation in the UK is widely seen to be effective. For instance, a review carried out for the European Commission in 2006 found that systems such as that in the UK, with a clear division of work between government and non-government regulators, seem to be highly effective. In its assessment of effectiveness, the review gave a strong rating to the UK system (Hans Bredow Institut, 2006). There are explicit provisions in the advertising codes regarding children, enforced by the Advertising Standards Authority and applying to advertising across all media.

19. The numbers of complaints to the ASA regarding children and advertising are relatively low. Over the course of 2008, 2009 and 2010, 1955 advertisements attracted 8139 complaints about their impact on, or portrayal of, children. To put these numbers into context, the ASA received 80,600 complaints about 42,600 advertisements in total during the same period. Just 4.6 per cent of the advertisements which received complaints overall did so on the grounds of their impact on children (drawing 10 per cent of the complaints) (Advertising Standards Authority, 2011(1)).

Some international approaches to protecting children through advertising regulation

In Australia the issues of commercialisation and sexualisation of children have been the subject of much debate in the last few years and in 2008, following consultation with industry and the public, the Code for Advertising and Marketing Communications for Children was revised, introducing a new code covering sexualisation. Another significant change to the Code was that adverts should not encourage children to pester their parents to buy a particular product – something already included in the UK Advertising Codes. In 2009 a practice guide was published to help advertisers across all media to ensure the protection of children and young people.

Canada is considered to have a highly developed system of codes and standards for responsible advertising to children. Two systems are in operation: one in French-speaking Quebec, where state regulation bans commercial advertising to children under 13 completely, and one covering the other five English-speaking provinces of Canada, where there is a strong system of self-regulation, including pre-clearance of all broadcast adverts aimed at children. However the ban in Quebec on directing commercial advertising to children under 13 years does not apply to signals originating from outside Quebec that are retransmitted by cable TV companies, such as advertising from the English-speaking provinces and the US, and there is limited evidence of the ban's effectiveness.

In Norway, the government has implemented a number of recommendations designed to reduce the commercial pressure on young people, and to equip children and their parents with the skills to help them understand commercial information and to withstand commercial pressures. As in Quebec, there is a ban on advertising to children under 13 years of age 'by wire or over the air' and advertising is not permitted in schools. A Consumer Ombudsman aims to initiate discussion with advertisers, media and others, promotes guidelines about appropriate advertising to children and acts as a point of contact for complaints about marketing to children as well as a watchdog for violations of the law.

Norway, too, however is finding it difficult to make national arrangements in a globalised arena. International channels and Norwegian channels broadcast from abroad (including the UK) are able to broadcast adverts to children in Norway. There is also commercial pressure through spin-off products related to popular programmes – for instance in the absence of advertising, some programme content for children now functions like extended commercials or TV character merchandise.

Source: Statham, Mooney and Phoenix, 2011

20. However, we know that many parents do not make complaints regarding things they do not like even when they feel they have cause to (see Themes 1 and 4). And while there is some evidence that the ASA enjoys a relatively high level of public awareness in comparison with other regulators (Advertising Standards Authority, 2008), recent research suggests that more could be done to increase public understanding of the ASA's role and of advertising regulation and complaints processes (Advertising Standards Authority, 2011(1)). We welcome the recent public awareness campaign to try to address this (the first for five years by the ASA). Together with the research on complaints cited elsewhere in this report, this suggests that there may be higher levels of concern than are represented by complaints figures.

21. We are heartened that the industry is already taking a number of steps to ensure advertising and marketing to children is within acceptable standards. We welcome, for example, the introduction of the Children's Ethical Communications Kit website (www.check.uk.com) by the Advertising Association which is designed to help advertisers and marketers understand their responsibilities towards children and how to comply with the CAP codes. We would urge anyone involved in advertising to children to use the website.

22. We also welcome the recommendations that the Advertising Association has made in its contribution to this Review (Advertising Association, 2011), in particular the proposal to create an industry panel to consider and take forward any issues relating to advertising and marketing to children that arise from this Review. We were also pleased to learn of the recent appointment of Rachel Childs, a former head teacher of a primary school, and Martin Narey, former Chief Executive of Barnardo's, to the independent ASA Council. They bring their extensive experience of working with children and families to the body that adjudicates on whether the Advertising Codes have been breached.

23. We do, however, think that there is scope for the advertising industry to go further. As well as ensuring that the ASA interpretation of the CAP codes reflects parental views, a responsible and ethical approach to marketing benefits both business and families and is an essential part of the relationship between commerce and children. Just as we think companies could do more to involve parents and children in responsible product development (Theme 2) and to ensure that parents' voices could be heard more (Theme 4) so we think advertisers and marketers and those who regulate them could be more sensitive to the concerns parents have about advertising. Consequently, we think that more should be done to be sure that advertising regulation is meeting the needs of parents.

24. As we have seen, children are exposed to an increasing volume of commercial messages (DCSF/DCMS, 2009), not least as they spend more time using the new media. As this area continues to develop at a rapid pace, advertisers and marketers need therefore to take care to continue to act responsibly when communicating to children.

> *It's natural. The companies have a responsibility to sell that product so they will sell it at the limit, almost crossing the line.*
>
> **Parent, Review qualitative research**

25. On the whole, however, parents accept that advertising is necessary for businesses to compete and that it has benefits for consumers, including children. Although parents tend to assume that advertisers will sometimes try to push boundaries, they accept this on the understanding that effective controls are in place.

RECOMMENDATION

7. **Ensuring that the regulation of advertising reflects more closely parents' and children's views.** The Advertising Standards Authority (ASA) should conduct research with parents and children on a regular basis in order to gauge their views on the ASA's approach to regulation and on the ASA's decisions, publishing the results and subsequent action taken in their annual report. *ACTION: ASA*

Inappropriate advertising

26. As well as the advertising and marketing messages that children receive for products intended for them, children are also exposed to a far greater volume of advertising and marketing not aimed at them (Advertising Association, 2011). Some parents responding to our Call for Evidence and taking part in our qualitative research were particularly concerned about age-restricted products and services, such as alcohol and gambling, particularly online. There are also concerns about the regulations and rules for restricting advertising of age-restricted products through other media. For example, large numbers of children see alcohol advertising around popular family television programmes and major sports events (Alcohol Concern, 2010).

27. Online exposure can be exacerbated by children lying about their age in order to register on sites with a minimum age limit, such as a social networking site. This is a practice that is widespread: one third (34 per cent) of 8-12 year-olds have a profile on sites that require users to register as being 13 or over, up from 25 per cent in 2009. Looking specifically at 10-12 year-old internet users, 47 per cent have such a profile, a rise from 35 per cent in 2009 (Ofcom 2011(2)). (See Theme 1 for our recommendation regarding age-restricted material.)

28. There is extensive guidance, in the Advertising Codes and the Internet Advertising Sales House members code of conduct, for example, and much good practice regarding advertising of age-restricted products online, but the industry acknowledges there is more to be done. We therefore welcome the commitment from the Advertising Association that it will do more to share best practice and explore what more can be done to limit children's exposure to inappropriate product advertising online and that it will continue to liaise with the UK Council for Child Internet Safety (UKCCIS) in developing solutions (Advertising Association, 2011).

'New' marketing techniques

29. By and large, then, we believe that existing regulatory provisions are in place and working well. However, where regulation has not kept up with developments in marketing communications, we believe that businesses must behave responsibly and not take advantage of those gaps to target children unfairly.

> 66*Technology is moving faster than our ability to regulate it. So we as businesses can't really wait for regulation before we do the right thing.*99
>
> **Business contributor to the Review**

30. While parents say that they are fairly confident in helping their children understand advertising and marketing when they see it in the 'traditional' media (television, radio, billboards, print), some parents taking part in our qualitative research were uneasy about some of the newer marketing techniques used in new digital media, such as advertising by phone or text, the use of 'Like' or 'Favourite' buttons on websites, or internet advertising generally. Awareness of such approaches may be lower, and when they hear about them some parents seem instinctively to consider techniques such as peer-to-peer marketing as not only unsuitable, but also unethical, for use with children (Define, 2011).

> 66*I think internet advertising is really the worst as it completely bypasses any parental supervision.*99
>
> **Parent, Call for Evidence response**

Newer advertising and marketing techniques

Peer-to-peer marketing

Peer-to-peer marketing is about incentivising people (through offering a reward of payment or 'free gifts' of goods or services) to market brands to their peers, rather than the advertisers talking directly to people. Marketers use 'peer-to-peer/word-of-mouth' techniques in traditional media as well as online, such as in 'tell a friend' promotions. Marketers also often seek to earn the endorsement of consumers without offering a reward.

Brand ambassadors

A brand ambassador is someone engaged by a brand or agency to promote or present a brand or product to others. This has traditionally involved celebrities or sportspeople acting as the public face of the brand, but a brand ambassador can be anyone being paid to promote a product to others, even for example their friends and family. The advertiser effectively employs the person as they would a traditional advertising medium like TV or Radio.

Advergames

Advergames broadly take the form of an interactive game, featuring a brand, product, good or service. They are hosted both on brands' own websites and external sites, as well as mobile phone applications and are subject to advertising regulations.

Online behavioural advertising (OBA)

Advertising on the internet is increasingly targeted and one of the ways this can be done is based upon user interests or behaviour. This is achieved when user interests are collected from web browsing activity over a period of time.

Behavioural advertising or interest-based advertising is intended to make display advertising that is more relevant to users' likely interests. Providers of behavioural advertising create audience segments based on web sites visited over a period of time with a particular browser. These audience segments are then used to provide relevant advertising to users within that segment. For example, a user may visit golf sites often and thus be categorised in the 'golf enthusiasts' segment. Some businesses now offer this in real time without the need to create a specific audience segment.

Sources: IAB (2), 2011; Advertising Association, 2011

31. Some of this concern arises because of the nature of marketing through websites, email, text messaging and other digital media. For example, the 'Like' or 'Favourite' buttons on social networking sites, although ostensibly market research tools, can clearly be used as marketing tools but are not classed as such. This adds to the impression of stealth-marketing techniques taking advantage of children's credulity and parents' relative inexperience online. Moreover, as these messages are delivered to the individual, parents are unlikely to know what advertising their children are exposed to at any given time. This combination of the unfamiliar and the unknown can make parents uneasy, as shown by the results of our omnibus survey (see Figure 10).

Figure 10: Parents' views of marketing and advertising tools

Do you think that any of these marketing and advertising tools should NOT be used when promoting products to children?
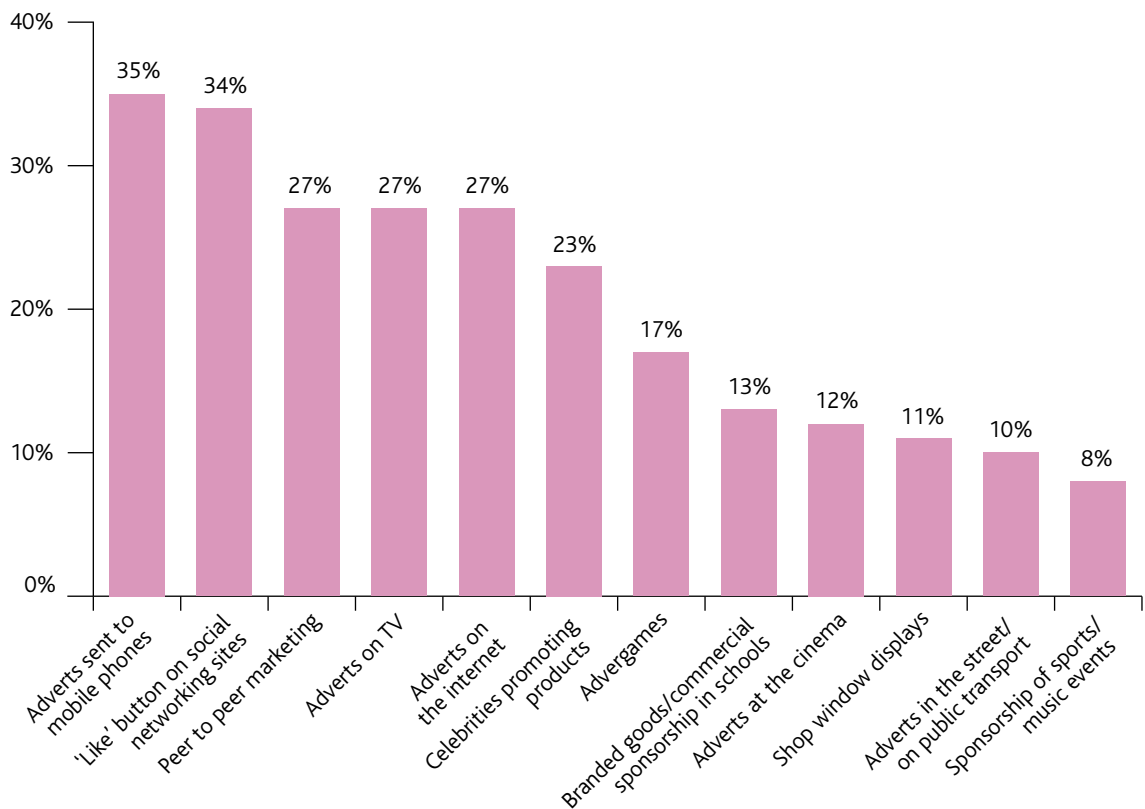
Source: TNS Omnibus Survey, 2011
Weighted base: 1199 parents in the UK

32. The key to helping children to distinguish between advertisements and content is clear and consistent labelling, and there are many examples of good practice, such as the clear separation of 'paid for' and 'non-paid for' search listings on most search engines. And while there is quite a lot of consensus over the age at which children understand television advertising (for example, see the work of Deborah Roedder John, 1999), how children use and understand newer marketing techniques is less certain, particularly as the lines between content and advertising can seem unclear to children, and the types of technique

used tend to be processed implicitly and without conscious awareness (Nairn and Fine, 2008).

33. In March this year, responding to the concerns of UK consumers, industry and policy makers, the ASA's online remit was extended significantly to cover marketing communications on companies' own websites and in other third party space under their control, such as social networking sites. The CAP Code will be applied in full to this new space.

34. It is also important that the line between market research (asking children anonymously what they think of a product) and marketing (encouraging them to buy a product) is drawn very firmly in the sand, and the current work of the Market Research Society to clarify this important distinction is to be welcomed (Market Research Society, 2010).

Peer-to-peer marketing and brand ambassadors

35. Another area of concern for parents is peer-to-peer and brand ambassador marketing, through which young people can receive a payment or payment in kind for promoting a particular product or brand to their friends.

36. Peer-to-peer marketing might be done online or face to face, and it draws on the long-recognised power of word of mouth to get a marketing message across. Word-of-mouth marketing amplifies and monetises the natural and spontaneous urge we have to tell our friends about the products and services we like. The Word of Mouth Marketing Association (WOMMA) describes it this way:

"Word of mouth is the most effective form of marketing in existence as it combines the newest strategies, tactics, and channels with the most basic human behaviour: people like to talk!"

Word of Mouth Marketing Association

37. Information about the size of the word-of-mouth industry in the UK is, however, hard to come by: available interim data from a current survey of industry activity indicates that some UK companies have used children under the age of 16 but not the extent of the practice (Advertising Association, 2011). And parents' attitudes towards it are mixed. The omnibus survey for this Review showed that more than a quarter of parents (27 per cent) thought peer-to-peer marketing should not be used to promote products to children, while research for the Advertising Association found that while some parents have concerns about the technique, others see some benefits, such as a source of pocket money (Advertising Association, 2011). However, alongside family organisations and consumer groups, many parents in our qualitative research expressed strong concerns about the ethics of paying children, or paying them in kind, to promote products personally to other children.

38. Whilst aspects of both the brand ambassador and peer-to-peer techniques are regulated, there are currently no regulations regarding the inclusion of children in peer-to-peer marketing campaigns or their employment as brand ambassadors. The WOMMA code stipulates that "A WOMMA member shall not include children under the age of 13 in any of its word of mouth marketing programs or campaigns" (Word of Mouth Marketing Association).

> *I don't like that peer-to-peer stuff or using my children.*
>
> *That peer-to-peer thing is extremely worrying, that is morally wrong isn't it...*
>
> **Parents, Review qualitative research**

39. It has been argued that such techniques can commercialise friendships and disrupt peer relationships for profit (Nairn, 2008). When specific provisions regarding children under the age of 16 are enshrined in the Advertising Codes and with evidence of the significant influence of peer pressure affecting children and parents and of use of 'pester power', we believe that it cannot be right for children to be rewarded for increasing that pressure (see our recommendation below).

Online behavioural advertising

40. Online behavioural advertising (OBA), a practice that allows brands to deliver adverts that aim to reflect the user's interests, has been at the centre of a privacy debate for the past few years since MEPs, Commissioners and national governments debated wording about 'cookies' (pieces of text sent from web servers and stored on your PC) in the ePrivacy directive adopted in 2009.

41. The European Advertising Standards Alliance (EASA) Best Practice Recommendation on Online Behavioural Advertising was released on 14 April 2011, and provides for an industry-wide self-regulatory standard for online behavioural advertising. It promotes the identification of OBA advertisements via a uniform European-wide icon, which clicks through to a website, www.youronlinechoices.com, providing information about OBA and a means for consumers to exercise their choice about whether they want to receive OBA advertisements. Consumers that want to complain about an OBA advertisement will be able to do so via the ASA, as for other advertising.

42. The Best Practice Recommendation will be rolled out over the next twelve months via national industry associations and self-regulatory organisations, such as the ASA, and by mid 2012 it is foreseen that 70 per cent of all member nations will have implemented it. The Best Practice Recommendation incorporates and complements the Internet Advertising Bureau Europe's 'icon' and consumer web tools.

43. We welcome this pan-European initiative, which can only improve parents' and children's understanding and awareness of Online Behavioural Advertising. However we have some concerns that the provisions relating to children apply only to children under 13, rather than all children under 16, when there have been calls, for instance from Consumer Focus (Pitt, 2010), to define a child as under 16 in all codes and provisions relating to children. There are also concerns that teens might be disproportionately targeted through this technique (Children's Charities' Coalition on Internet Safety, 2010).

44. Alongside the steps the advertising industry is taking towards ensuring ethical practice in the use of new techniques, the ASA remit is continually reviewed. As noted above, for example, following the receipt of thousands of complaints about online advertising and marketing, from 1 March 2011 the ASA's remit was extended to cover non-paid-for space online, such as branded content of social networking sites and brands' own websites.

45. We very much welcome this significant development in the ASA's role, but it is at a very early stage. There will inevitably be grey areas and occasions when it is difficult to distinguish editorial content from a marketing message, and the ASA will need sufficient resources to police this area. This makes it even more necessary for businesses to step up and ensure their marketing complies with the spirit of the regulation as much as the letter, for example by using the Advertising Association's CHECK website. Parents, too, need to identify areas of concern proactively to companies and the ASA.

46. However, in the longer term, marketing techniques such as word of mouth need to be brought within the ASA's remit, and the various voluntary codes and sets of guidance currently in development or use should be aligned with the Advertising Codes to give greater clarity and consistency across all aspects of marketing and advertising to children.

RECOMMENDATIONS

8. **Prohibiting the employment of children as brand ambassadors and in peer-to-peer marketing.** The Committee of Advertising Practice and other advertising and marketing bodies should urgently explore whether, as many parents believe, the advertising self-regulatory codes should prohibit the employment of children under the age of 16 as brand ambassadors or in peer-to-peer marketing – where people are paid, or paid in kind, to promote products, brands or services. *ACTION: Committee of Advertising Practice, the Advertising Association and relevant regulators*

9. **Defining a child as under the age of 16 in all types of advertising regulation.** The ASA should conduct research with parents, children and young people to determine whether the ASA should always define a child as a person under the age of 16, in line with the Committee of Advertising Practice and Broadcast Committee of Advertising Practice codes. *ACTION: ASA*

Media and commercial literacy

47. Alongside responsible marketing practices and effective regulation, parents and children should have a sound awareness and understanding of advertising and marketing techniques and regulation. The greater parents' awareness and understanding of marketing communications, the more they will be able to support their children in understanding and navigating the commercial world. Parents are increasingly 'digitally literate', but our qualitative research suggests that aspects of their media and commercial literacy, such as awareness and understanding of some of the newer advertising and marketing techniques, are relatively low. Parents in the qualitative research which informed this Review said they would appreciate more, and more easily accessible, information rather than specific support groups or classes.

48. While the ASA public awareness campaign and development of the CHECK website for the industry are to be welcomed, there is currently no guidance specifically designed for parents on advertising codes for children.

49. As the assessment by Professor David Buckingham and colleagues found (DCSF/DCMS, 2009), it is not possible to say unequivocally that children are, in all circumstances, either 'vulnerable' or 'savvy': how children respond to commercial messages depends on the context. The assessment concluded that children's consumer socialisation should be considered in terms of social as well as cognitive capabilities:

"Research on 'consumer socialisation' suggests that children gradually develop a range of skills and knowledge to do with the commercial world that help prepare them for adult life. They are neither the helpless victims imagined by some campaigners nor the autonomous 'media savvy' consumers celebrated by some marketing people. Their engagement with the commercial world is part of their everyday social experience and is very much mediated by other social relationships with family and friends."

DCSF/DCMS, 2009

50. As young people, parents and teachers become more aware of the ways in which e-commerce proliferates, children are likely to develop increased sophistication in relation to online advertising, as the evidence indicates they have done in relation to more traditional television advertising (Young, 2010).

51. However, we remain unconvinced that simply improving the media and commercial literacy skills of children provides a sufficient response or protection. Understanding why advertisers often use models who are tall, slim and beautiful, or that some advertisements want us to make an association between a brand and greater happiness or wellbeing, does not make it any more palatable to the child who does not conform to the stereotype of good looks or for whom the cost of a brand keeps it out of reach. Nor does it 'immunise' children from the influence of marketing.

52. Whilst a range of educational initiatives exist to support children in schools (DCSF/DCMS, 2009; Advertising Association, 2011), there is a need to evaluate further the effectiveness of child media and commercial literacy initiatives both inside and outside schools. There is also a need for an increased focus on improving parents' awareness and understanding of newer marketing techniques and advertising regulation as a whole, enabling them to support their children better in developing their emotional resilience to commercial pressures.

> *If I stand on a pin, the nerves in my foot send a message through my nervous system to tell my brain I am experiencing pain and to lift my foot. Knowing how the media works is like that. I understand how the system works, but it doesn't stop it hurting.*

15 year-old girl in conversation with Reg Bailey

CASE STUDY: IMPROVING PARENTS' MEDIA LITERACY IN ARGENTINA

In partnership with the media industry, Argentina's Ministry of Education has created a national media education programme. This is designed to increase the ability of children and young people to understand and interpret messages in the media, and to help parents guide their children's relationship with the media.

Booklets for parents have been produced and distributed as inserts in popular newspapers – all funded by industry. *'TV in the Family',* for instance, answered some frequent questions and concerns that parents have about children and television along with helpful advice to help parents discuss television with their children. *'Internet in the Family'* contained tips and recommendations for safer internet use, enabling parents to provide guidance to their children when surfing the internet. Both campaigns were funded by companies in the media and communication industries, and supported by television adverts, radio discussions and an online discussion forum.

Source: Ministry of Education, Argentina

RECOMMENDATIONS

10. **Raising parental awareness of marketing and advertising techniques.** Industry and regulators should work together to improve parental awareness of marketing and advertising techniques and of advertising regulation and complaints processes and to promote industry best practice. *ACTION: Advertising and marketing industry, with the ASA and the Advertising Association (AA)*

11. **Quality assurance for media and commercial literacy resources and education for children.** These resources should always include education to help children develop their emotional resilience to the commercial and sexual pressures that today's world places on them. Providers should commission independent evaluation of their provision, not solely measuring take-up but, crucially, to assess its effectiveness. Those bodies with responsibilities for promoting media literacy, including Ofcom and the BBC, should encourage the development of minimum standards guidance for the content of media and commercial literacy education and resources to children. *ACTION: Media and commercial literacy providers, with Ofcom and the BBC*

Making Parents' Voices Heard

" I think people need to know that they are not the only ones that feel strongly about unsuitable images for children and that it is a positive thing to express their views. "

Parent, Call for Evidence response

Overview

> Parents have told us that they feel they cannot make their voices heard, and that they often lack the confidence to speak out on sexualisation and commercialisation issues for fear of being labelled a prude or out of touch.

> Business and industry sectors and their regulators need to make clear that they welcome, and take seriously, feedback on these subjects.

> Given the technology available, regulators and businesses should be able to find more effective ways to encourage parents to tell them what they think, quickly and easily, and to be transparent in telling parents how they are responding to that feedback.

> Once parents know that their views are being taken seriously, we would expect them to respond positively towards companies that listen to their concerns.

WHAT WE WOULD LIKE TO SEE

That parents find it easier to voice their concerns, are listened to more readily when they do, and have their concerns visibly acted on by businesses and regulators.

RECOMMENDATIONS

12. **Ensuring greater transparency in the regulatory framework by creating a single website for regulators.** There is a variety of co-, self- and statutory regulators across the media, communications and retail industries. Regulators should work together to create a single website to act as an interface between themselves and parents. This will set out simply and clearly what parents can do if they feel a programme, advertisement, product or service is inappropriate for their children; explain the legislation in simple terms; and provide links to quick and easy complaints forms on regulators' own individual websites. This single website could also provide a way for parents to provide informal feedback and comments, with an option to do so anonymously, which regulators can use as an extra gauge of parental views. Results of regulators' decisions, and their reactions to any informal feedback, should be published regularly on the single site. *ACTION: Regulators*

13. **Making it easier for parents to express their views to businesses about goods and services.** All businesses that market goods or services to children should have a one-click link to their complaints service from their home page, clearly labelled 'complaints'. Information provided as part of the complaints and feedback process should state explicitly that the business welcomes comments and complaints from parents about issues affecting children. Businesses should also provide timely feedback to customers in reaction to customer comment. For retail businesses this should form part of their code of good practice (see Theme 2, Recommendation 6), and should also cover how to make it easier and more parent-friendly for complaints to be made in store. *ACTION: Businesses, supported by trade associations*

Introduction

1. We have been struck during the course of this Review by the apparent contradiction between the clear concern of many parents about the commercialisation and sexualisation of childhood, and the fact that regulators, broadcasters and businesses receive few complaints about such issues relative to other types of complaint.

Figure 11: Level of parents' complaints compared with the number of unsuitable images and products seen by parents

> The Review's omnibus survey showed that 40 per cent of parents had seen things in public places (for example, shop window displays or advertising hoardings), and 41 per cent had seen programmes or advertisements on TV, in the past 3 months that they felt were unsuitable or inappropriate for children to see because of their sexual content. However, only 8 per cent of parents had ever complained about such things.

> In the parental Call for Evidence, respondents were asked to think about when they had been out and about with their child/children over the last few weeks and if they had seen any images *aimed at children* that they felt were inappropriate for their child/children to see. Of the 846 people who answered this question, a substantial minority (330) said they had. When asked whether they had seen images *aimed at adults* they felt were inappropriate for their child/children to see, of the 874 people who answered the question, 576 said they had.

> > Respondents to the Call for Evidence were also asked about shopping for their child/children over the last year and whether they had come across clothes, toys, games, music videos or other products that were not appropriate for the age group they were aimed at. Of the 873 people who answered this question, 389 answered 'Often' and 388 answered 'Occasionally'.

> > Despite these concerns, when parents were asked whether they had made a complaint about something they felt was not appropriate for their child/ children to see, only 188 out of the 904 responding to the question said that they had.

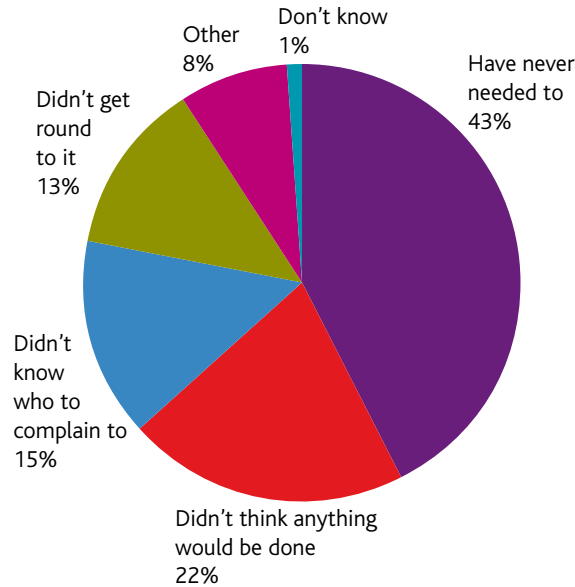> Source: TNS Omnibus Survey, 2011 and Review Call for Evidence

2. These relatively low rates of complaint may reflect the fact we have already observed (in the Introduction) that commercialisation and sexualisation issues are not the top-most priority for parents. Some business and industry contributors to this Review have certainly interpreted a low level of complaints as a sign of low concern. Yet we have also heard from parents and other contributors to the Review about the barriers – real or perceived – which prevent some parents from making their views known. In the face of these barriers, and since the true extent of parental concern is not currently reflected in complaints statistics, it is simply not good enough for businesses and industry to say there is no real issue.

3. Despite some good practice, notably from the Advertising Standards Authority (ASA), the consumer complaints landscape is complex, confusing and inconsistent and certainly does not encourage parents to voice their concerns or make complaints. Our omnibus survey showed that the majority of parents (92 per cent) have never complained about things (for example, products and adverts) whether in public places, on television, on the internet, in a newspaper or magazine that they felt were inappropriate for children because of sexual content. This was because they have never needed to (43 per cent), they didn't think anything would be done (22 per cent), didn't know who to complain to (15 per cent) or didn't get round to it (13 per cent) (Figure 12).

Figure 12: Reasons parents did not complain

Why have you not complained when you have seen things you felt were inappropriate for children because of sexual content?

Source: TNS Omnibus Survey, 2011
Weighted base: 1199 parents of children aged 5-16 in UK

4. Parents in our qualitative research and in the Call for Evidence also said that they thought the process would be difficult and time-consuming, or that complaining about these issues may make them look prudish, unreasonable or 'just making a fuss'. All of these factors contribute to a reduction in parents' confidence in the willingness of organisations to listen to them.

5. We found that there is definitely scope on the part of regulators and businesses to ensure that their own complaints mechanisms are easy to find and use, with information about what action is being taken as a result communicated in a timely fashion.

6. The general difficulty in registering complaints seems all the more contradictory in the face of the consistent view among business contributors to this Review that they take customer feedback and complaints seriously and act swiftly, particularly when children's interests are involved. It appears, however, that this message is not being communicated persuasively to parents.

7. Aside from actual complaints, there should be ways for parents' voices to be heard more generally on these issues and there is scope for businesses to capitalise on the power of instant feedback from their online activities. It is in all our interests, especially for businesses and regulators, to improve the ongoing dialogue with parents, to respond as meaningfully as possible to their views and to offer timely and transparent feedback, as a way of reassuring parents that it is legitimate to have concerns about such issues.

Knowing who to complain to – a complex complaints landscape

8. The regulatory landscape relating to commercialisation and sexualisation of childhood is complex, leading to an equally complex complaints process for the different media, business sectors and issues involved. As can be seen from Figure 13, it is not easy for a member of the public to determine to whom they should complain and, although the regulators do make efforts to inform the public about their services, it can be no surprise that the public are sometimes confused.

Figure 13: Overview of the complaints landscape on taste and decency
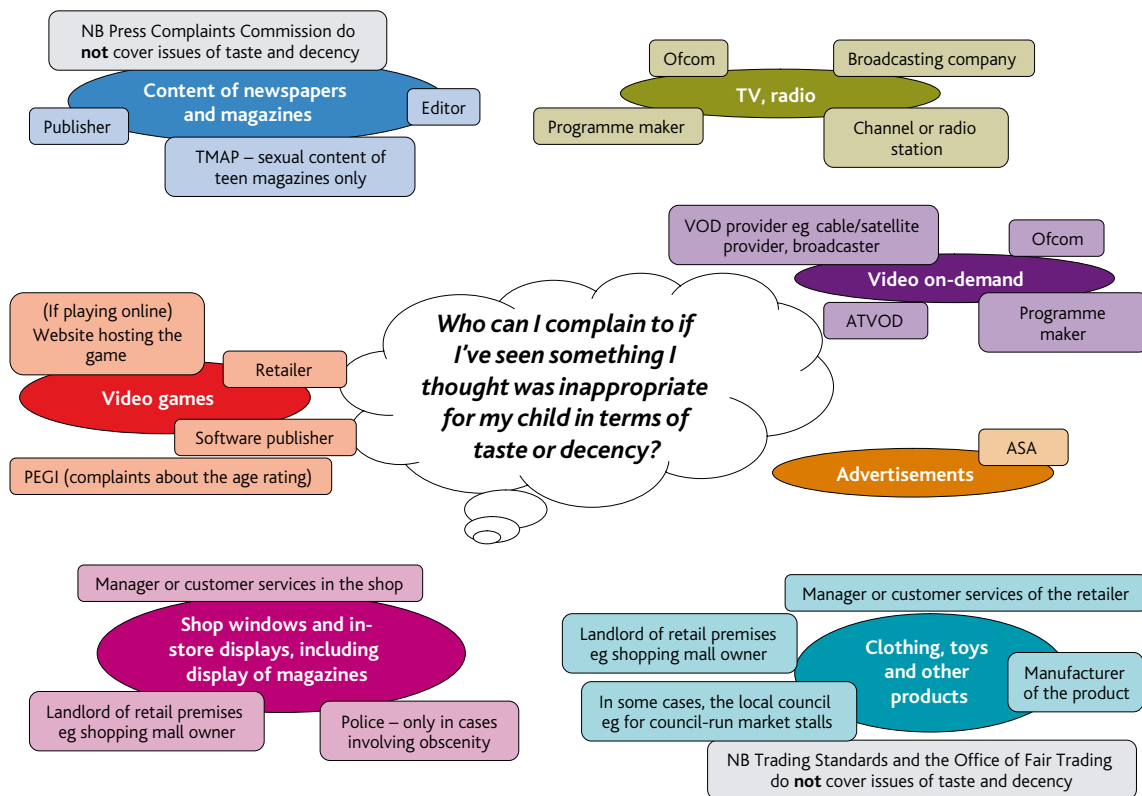
Sources: Websites of regulators, Directgov (2)

Advertising

9. Advertising regulation has perhaps the most straightforward system as the industry has a one-stop shop regulator in the form of the Advertising Standards Authority. The ASA regularly measures attitudes and awareness of its own brand and services, and its most recent survey in 2009 showed that nearly one in five people could spontaneously name the ASA and recognise its logo (Advertising Standards Authority, 2011(3)), while an online

Ipsos MORI survey in March 2008 found that the ASA was the best known media regulator (Advertising Standards Authority, 2008).

10. Despite this good public awareness, the ASA still receives complaints about issues which are not within its remit. For example, in 2010, of the 1,863 total complaints connected with children received, 115 (6.1%) were outside the remit of the ASA (Advertising Standards Authority, 2011(1)).

11. The ASA works hard to improve public understanding of its role and to help consumers navigate the complaints landscape. In our view, the ASA website was the most user-friendly of all the regulators' sites we looked at (Advertising Standards Authority, 2011(2)). In addition to promoting its own services, the ASA website offers a good range of information about the roles and responsibilities of other regulators. Indeed, we found that there was more information easily to hand on the ASA's website about issues outside its remit – for example what to do about a complaint about a shop window – than we could find on other regulators' websites. We are also aware that the ASA works proactively to forward complaints to the relevant regulator if they are not in the ASA's remit.

12. In contrast, we feel that the complaint mechanisms for other sectors are more opaque.

Broadcasting

13. Unlike the advertising industry, broadcasting does not have a one-stop location for complaints. Complaints can be made to a variety of bodies – for example, the programme maker or programme website, the channel or radio station, the broadcasting company or the broadcast regulator, the Office of Communications (Ofcom). In addition, for video-on-demand programming, complaints can also be made to the on-demand provider, the internet service provider or the regulator, the Authority for Television On Demand (ATVOD). Complaints methods, processes and timescales are different for all of these bodies. This also means that complaints about a particular programme or issue are not all in one place, making it difficult to assess accurately the size and nature of viewers' reactions.

Retail

14. There is no regulatory framework that covers taste and decency issues in retailing in the way that these are covered for the advertising and broadcasting industries. Legislation through the Consumer Protection from Unfair Trading Regulations 2008 covers only misleading or unfair trading so the Office of Fair Trading and Trading Standards Officers, the main retail regulators, cannot consider issues beyond this remit. In extreme cases concerning indecency, there may be a case for complaining to the police: for example if a shop window display was pornographic. But the kinds of retail products and displays complained of by parents in our Call for Evidence, such as inappropriate slogans on childrenswear, or overtly sexualised poses of mannequins in shop windows, can only be brought to the attention of the retailer in question.

15. The landlords of retail space, notably shopping mall owners, can also consider acting on customer complaints, and we are aware of one example of a shopping mall which insisted that a retailer change their window display as a result of customer complaints. However, we doubt that many parents would be aware of this as a possible avenue of complaint.

Print media

16. In terms of print media, as set out in Theme 1, the use of sexualised pictures on the front page or cover of tabloid newspapers and magazines (for example, the so-called 'lads' mags') has raised concerns. Some parents are also concerned about the pictures of models or celebrities that fuel anxieties in children about their bodies, that is, that they do not conform to some arbitrary standard of beauty.

> 66*With girls I think she sees the celebrities and she associates them with perfect... think that's how she's got to look. She's only 7 and she'll talk about someone being pretty and thin, and that's directly because of the magazines.*99
>
> **Parent, Review qualitative research**

17. Although, as a recent report for Demos (Darlington et al, 2011) points out, there is no clear evidence of a causal link between such images and harm to young people, it *is* clear that both parents and young people who contributed to the Review see such magazine coverage as contributing to issues such as low self-esteem and self-image. A number of the young people's and women's organisations who contributed to the Review also shared this view. Currently the only avenue of complaint on these issues is to the magazine itself or the retailer as this is not covered by the regulatory system for print media. The public campaigns currently running on both magazine display and airbrushing should help raise awareness of these issues. For example, Girlguiding UK's petition calling for labelling to distinguish between airbrushed and natural images received over 25,000 signatures.

18. In terms of the editorial content of the print media, parents contributing to the Review reported very little concern although there were a few comments made about the age-appropriateness of the content of some teenage magazines. The main regulatory body for the print media, the Press Complaints Commission, is responsible for complaints on the editorial content of newspapers, magazines and their websites but its remit expressly excludes matters of taste and decency (Press Complaints Commission,

> 66*When I was eleven I read a teenage magazine for the first time and that's when it kind of clicked, 'I should be like this'.*99
>
> **Young person (Girlguiding UK, 2008)**

2011). Matters of taste and decency in print can only be raised with the publication in question, although complaints specifically about the sexual content of teenage magazines can be directed to the Teenage Magazine Arbitration Panel (TMAP) but only after the complaints process of the magazine in question has been exhausted (Teenage Magazine Arbitration Panel, 2011). However, the panel has only ever ruled on three complaints, with its last adjudication in April 2005, and Sue Palmer, author of *Toxic Childhood*, has described TMAP as a "toothless watchdog".

Knowing how to complain – making it quick and easy to express a view

19. When we asked parents in our Call for Evidence what would make it easier for them to complain about things they thought were inappropriate for their children, it was obvious that the quickness and ease of making a complaint was a big factor (Figure 14).

Figure 14: Making it easier for parents to complain

What would make it easier for you to complain about things you think are inappropriate?

	Total*
Knowing someone would take my complaint seriously	763
Knowing a website I could use to make a complaint	604
Knowing there would be a quick complaints process – no need to fill in long forms etc	533
Knowing a telephone or text number to make a complaint	302
Knowing an address to write to make a complaint	201
Nothing – I probably wouldn't complain more than I do now even if it was easier	33
Other	18

*There were 968 responses to this question: figures do not total 968 as respondents could select more than one suggestion.
Source: Parental Call for Evidence

20. When the Review team looked at several broadcasters' and retailers' websites, however, quickness and ease were typically not what we found. Although there were often 'Help' and 'Contact Us' buttons somewhere on the homepage, it was not clear that these sections of the website also dealt with complaints. It was not unusual for it to take five or more clicks from the front page of a website before any reference to making a complaint appeared. There were some notable exceptions. For example, the BBC has a large font reference to 'Complaints' on its homepage, and this leads through to its complaints mini-site where clear and full information is available, not only on how to complain, but also with feedback on the number and types of complaint received and the action taken as a result.

21. New technology is making it increasingly easy for the public to provide, and businesses themselves to seek, feedback informally. In contrast to the formal complaints sections, these informal channels are usually very prominently placed on businesses' websites. Examples were submitted to the Review of the various interesting and exciting ways in which businesses and consumers are using avenues such as social networking sites, blogs, and message boards to share views on programmes, products and services. Clearly, businesses are being very creative in how they approach informal dialogue with their customers, and both parents and children contributing to the Review thought that such creativity could usefully improve ease of access to formal complaints systems.

Ideas for making complaining easier

> "Complaints details on till receipts."

> "Anonymous feedback forms in store."

> "Every advertising poster to have a freephone number for complaints."

> "Something like the "How's my driving?" stickers but for shop windows and posters."

> "Advisory messages before and after TV programmes with details for complaints, in the same way they sometimes give a phone number to call if you have been affected by an issue."

Source: Parents, children, young people and organisations, Call for Evidence responses and interviews

The feedback loop – demonstrating to parents that comments and complaints are taken seriously

22. Our parental Call for Evidence showed that a lack of faith in complaints being taken seriously was the most important factor in those parents deciding not to complain (Figure 14 above). In their comments, respondents referred to a variety of reasons why they felt this, but two stood out.

23. First, some parents who had previously made a complaint said that their experience of getting slow or unsatisfactory responses had put them off complaining again when they saw something inappropriate for their children. We understand that complainants are going to be disappointed if their complaint is rejected. But a timely and personalised response will make such disappointment easier to accept, and provide reassurance that someone has listened to one's views.

> "I felt that I was a small fish in a big ocean swimming against the tide. I would have no effect."
>
> "I have never felt it would make a difference if I did complain."
>
> "I have often complained but nothing comes of complaints except polite letters acknowledging them."
>
> "Even if the company agrees, they always cite policies, guidelines or rules from above preventing them from doing anything about it."

Parents, Call for Evidence response

24. As noted above, the complex complaints landscape means that regulators and businesses take very different approaches to the way and the timescales in which they respond to complainants. The ASA, for example, provides a personal reply to every complaint explaining its decision and reasoning and consistently exceeds its turnaround performance targets for all case types (Advertising Standards Authority, 2011(3)). In the case of Ofcom, most complainants will receive a standard response that refers them to the Ofcom website where all decisions are published. Only cases that Ofcom has taken forward for full investigation are published in the form of a detailed finding. Businesses could clearly reassure parents that they do indeed take these issues seriously, by continuing to find ways to improve the quality and timeliness of their response to complaints.

25. The second barrier that parents contributing to the Review specifically mentioned was that they either felt, or feared being made to feel, embarrassed if they complained about issues of taste and decency. Interestingly, although the regulators who responded to the Call for Evidence commented on issues concerning the complaints process (for example, ease of complaint, transparency in complaints processes

and so on), none picked up on the possibility that parents might fear ridicule or embarrassment. And while the retailers we spoke to for this Review clearly felt that a complaint direct to the store was the best avenue, some parents reported feeling intimidated or embarrassed by having to do this.

26. Regulators and businesses could build parental confidence in raising issues of sexualisation and commercialisation in an overtly non-judgmental and reassuring manner by, for example, having clear statements on their websites welcoming such comments, reporting on such issues separately in their annual reports, and regularly seeking informal feedback from parents in a more dynamic way than they do currently. Such measures would help to convey a clear message to parents that it is 'OK' to say what they think and that other parents feel the same way: they are not the odd ones out.

27. The Government's new consumer empowerment strategy 'Better Choices, Better Deals; Consumers Powering Growth' (Department for Business, Innovation and Skills and Cabinet Office, 2011) commits all government regulators to greater transparency, both in providing timely and clear feedback and data to consumers on complaints, and in supporting and nurturing greater customer feedback, including instant feedback through new technologies. It would be extremely encouraging if regulators would choose commercialisation and sexualisation of childhood as an area of particular focus when considering how to act on this new strategy, and this could be a very positive way of helping to overcome the barrier of feared social stigma that some parents clearly experience:

> *"I felt prudish!"*
>
> *"I feel that our society trivialises sex and treats people who complain about inappropriate imagery as prudish or old-fashioned. I don't feel that I would be taken seriously."*
>
> *"I was embarrassed to make a complaint!"*
>
> *"My daughter doesn't like it when I complain in shops! Also, I don't want to draw her attention to inappropriate clothes etc."*
>
> **Parents, Call for Evidence response**
>
> *"More people might complain... if you didn't have to speak to anyone."*
>
> **Parents, Review qualitative research**

"We know that not everybody is a confident consumer which is why 'Better Choices, Better Deals' is about helping to support [them] in becoming more confident. (…) We want regulators (…) and public service providers to publish more of their data, especially on complaints. And above all we want this strategy to stimulate feedback, enabling consumers to be stronger by acting together."

Edward Davey, Minister for Consumer Affairs quoted in 'Better Deals, Better Choices'

RECOMMENDATIONS

12. **Ensuring greater transparency in the regulatory framework by creating a single website for regulators.** There is a variety of co-, self- and statutory regulators across the media, communications and retail industries. Regulators should work together to create a single website to act as an interface between themselves and parents. This will set out simply and clearly what parents can do if they feel a programme, advertisement, product or service is inappropriate for their children; explain the legislation in simple terms; and provide links to quick and easy complaints forms on regulators' own individual websites. This single website could also provide a way for parents to provide informal feedback and comments, with an option to do so anonymously, which regulators can use as an extra gauge of parental views. Results of regulators' decisions, and their reactions to any informal feedback, should be published regularly on the single site. *ACTION: Regulators*

13. **Making it easier for parents to express their views to businesses about goods and services.** All businesses that market goods or services to children should have a one-click link to their complaints service from their home page, clearly labelled 'complaints'. Information provided as part of the complaints and feedback process should state explicitly that the business welcomes comments and complaints from parents about issues affecting children. Businesses should also provide timely feedback to customers in reaction to customer comment. For retail businesses this should form part of their code of good practice (see Theme 2, Recommendation 6), and should also cover how to make it easier and more parent-friendly for complaints to be made in store. *ACTION: Businesses, supported by trade associations*

Conclusion

1. The approach we have taken throughout this Review has been to listen to the concerns of parents about the pressures their children are under to grow up quicker than they think is right, and to consider what should and could be done in a practical way to alleviate these pressures. Although we conclude that these concerns are not at the forefront of most parents' minds, we do not consider that this is a reason for complacency. The number of parents and organisations contributing to this Review show that there is significant interest in these issues and the majority of parents taking part felt that aspects of commercialisation and sexualisation made their children's lives, and their own by extension, more difficult than they needed to be. This is reason enough to act.

2. Parents themselves have the primary responsibility for helping their children to grow up safely and healthily and at a pace that is right for the individual child. Children need their parents to help them navigate the world around them and to give them appropriate values as well as drawing reasonable boundaries that help minimise actual harm. But parents also want and expect businesses to support them in this. They want the commercial world to act responsibly towards children through, for example, helping to provide a family-friendly public space. Parents also want to be able to raise concerns when they think things are going wrong, to feel confident that they will be taken seriously, and that businesses will put things right when needed.

3. Most businesses, most of the time, understand and respect the need to behave responsibly when providing goods and services for children. In our view, the existing statutory regulatory provision, with the exception of the changes needed to the Video Recordings Act 1984 and 2010, taken with the voluntary, co- and self-regulatory framework established by Government, regulators and industry, is adequate for its purpose. It does not appear to us, as things currently stand, that there is a need for more statutory controls on business relating to the commercialisation and sexualisation of children. However, what is required is a change in the way that businesses operate within the existing framework. In particular, the opinions of parents should be given greater prominence by broadcasters, businesses and regulators when developing and providing services and goods for children and families.

4. We have certainly detected a willingness among companies to pay attention to the views of parents and to behave responsibly. That is why, in developing the recommendations in this report, we have sought to work with the direction of travel that responsible businesses have already taken. Businesses have an incentive to behave responsibly towards children and young people: they are likely to respond positively towards companies that listen to their concerns. Many businesses are already finding ways to do that and we have acknowledged the work that is being done by the British Retail Consortium, the Advertising Association and others to take account of the views of parents and young people.

5. Nevertheless we recognise that it can be difficult to bring about change and improvement in these matters voluntarily. It was made clear to us at the outset of this Review that the Government would, if necessary, introduce regulation in order to minimise the commercialisation of childhood and reduce the risk of premature sexualisation. We think that, if the voluntary measures set out in our recommendations are implemented, statutory measures will not be needed. However, this option needs to remain open if voluntary activity does not show progress.

6. While it is reasonable to allow industry and the regulators some time to act on the recommendations aimed at them in this report, we think that the Government should monitor implementation and formally review progress in 18 months' time. A stocktake, to include an independent assessment of progress, should report on the success or otherwise of businesses and others in adopting the recommendations of this Review. If the stocktake reaches the conclusion that insufficient progress has been made, our view is that the Government would be fully entitled to bring forward appropriate statutory measures. Parents would want no less.

7. However, that does not mean that Government, parenting groups and others (including parents themselves) need do nothing until then. Rather, we would like to see them redouble their efforts to hold to account those to whom our recommendations are addressed. Given the strength of feeling that we have heard expressed during this Review, we have no doubt that they will.

RECOMMENDATION

14. **Ensuring that businesses and others take action on these recommendations**. Government should take stock of progress against the recommendations of this review in 18 months' time. This stocktake should report on the success or otherwise of businesses and others in adopting these recommendations. If it concludes that insufficient progress has been made, the Government should consider taking the most effective action available, including regulating through legislation if necessary, to achieve the recommended outcome. ACTION: Government

Annexes

Annexes

Annex A

Review of Commercialisation and Sexualisation of Childhood: Terms of Reference

1. Parents express real concern about children being pressured into growing up too quickly. The Government has therefore made a commitment to take action to protect children from excessive commercialisation and premature sexualisation, as part of the work of the Task Force on Childhood and Families. The purpose of the independent Review will be to assess the evidence and provide Government with recommendations on how best to address public concern in this area. In doing so, it will need to consider the findings and recommendations set out in the recent policy reviews by Prof. Tanya Byron and Dr. Linda Papadopoulos, the evidence assessment on commercialisation by an expert panel chaired by Professor David Buckingham for DCSF and DCMS and his research on sexualised goods aimed at children for the Scottish Parliament, and other related assessments (see Note below).

2. The Review should take a wide-ranging and independent examination of the evidence and provide recommendations that are fit for purpose and meet public concerns. Recommendations should seek to identify measures that are more likely to result in businesses collectively and individually changing their behaviour and which empower consumers to voice their concerns more effectively. As such, the recommendations should be informed by the views of both consumers, particularly parents, and the business community; they should also draw on the expertise of existing regulators.

3. The Review should be structured according to the following four themes:

a. Risks of harm and barriers to parenting

Set out an assessment of the evidence base, including from existing reviews, to clarify what risks of harm are associated with excessive commercialisation and premature sexualisation. This should be in terms of harm to children (e.g. self-esteem, mental health, physical health) and creating barriers to parents exercising their parental responsibility in raising their children. In particular, the Review needs to establish the kind and scale of public concern in this area and review the extent to which they provide a barrier to parenting or a risk to children. The impact on both boys and girls should be considered equally.

b. Principles – defining and exemplifying boundaries

Define excessive commercialisation and premature sexualisation of children, by drawing on the evidence, including: from the previous reviews stated above, existing regulation, self-regulation and codes of practice, and the views of parents and young people. This

should include addressing issues on gender stereotyping and body image, and examine the full range of advertising, marketing (e.g. product placement, sponsorship) and commercial activity. This examination should cover activities directed at children and young people themselves, but also consider activities promoting goods and services not aimed at children (such as alcohol) but with which children are likely to have contact. These definitions will help inform a set of principles for regulation and practice which are age appropriate and draw on approaches used in the relevant business sectors as appropriate, easily understood by the public and in plain English. The principles should also be informed by and be illustrated through a full range of examples (preferably from the UK).

c. Consumer voice

Identify what systems are currently in place to allow consumers to voice their concern and complaints across sectors, and assess whether there are any barriers to consumers doing so (e.g. lack of awareness, complexity of the system from point of view of consumer, lack of confidence in the system, methods for complaining). Where barriers exist, particularly for parents and young people, the Review should examine what steps can be taken to address these. The Review should also consider the role of the Big Society – e.g. social networks, communities, youth groups – in influencing change.

d. Corporate social responsibility

Assess how businesses currently fulfil their corporate social responsibility in this area, through the full range of existing measures, and identify whether any changes need to be made to these measures. The Review will need to work with consumers, regulatory bodies and business representatives in identifying any possible changes. In particular, the Review should:

i)   Set out existing measures across relevant business sectors (e.g. advertising, marketing, press, broadcasting, digital services, trading standards and retail);

ii)   Assess whether these are adequate (sufficient or necessary) in minimising excessive commercialisation and premature sexualisation; and

iii)   Identify what further steps can be taken if existing measures are not adequate, including removing unnecessary measures as well as introducing more effective ones (exercising "one in one out" principle).

4.   Though wide-ranging, the scope of the Review should not include areas that are either currently being progressed by Government or do not focus explicitly on issues of commercialisation or sexualisation. Thus, the Review should not focus on:

a)   The internet itself and safeguarding in general, as this is currently the focus of a programme of work being undertaken through the UK Council for Child Internet Safety (UKCCIS); though clearly some internet content is within scope.

b) Wider policies to reduce harm, such as reducing obesity or alcohol abuse, unless evidence emerges during the Review of children being exposed inappropriately to promotional activities for such products.

c) Child performance in the entertainment industry, which is subject to review separately later this year.

5. The Review is planned to take five months, starting in December and ending in May 2011 with a published report with recommendations. The independent Review lead will be appointed by the Minister of State for Children and Families, Sarah Teather MP, and will be expected to report interim findings to the Minister, Task Force and Task Force officials group during the Review.

Note:

The following are the key policy and evidence reviews:

> Prof David Buckingham, "The impact of the Commercial World on Children's Wellbeing", http://publications.education.gov.uk/default.aspx?PageFunction=productdetails&PageMode= publications&ProductId=DCSF-00669-2009

> Prof David Buckingham, report to Scottish Parliament Equal Opportunities Committee, SP Paper 374, "External research on sexualised goods aimed at children", http://www.scottish.parliament.uk/s3/committees/equal/reports-10/eor10-02.htm

> Dr Linda Papadopoulos, "Sexualisation of young people review" http://webarchive. nationalarchives.gov.uk/20100418065544/http://homeoffice.gov.uk/documents/ Sexualisation-of-young-people.html

> Prof Tanya Byron, "Safer Children in a Digital World: The report of the Byron Review 2008" and "Do we have safer children in a digital world? A review of progress since the 2008 Byron Review", both at http://www.dcsf.gov.uk/byronreview/

> Media Consumption and Viewing Behaviour of Children – unpublished research of DCSF

> Unpublished report by Consumer Focus on the regulation of the use of integrated marketing techniques and digital technology to market products to children

> Ofcom "Guidance Notes – Section One: Protecting the under 18s" (guidance on programme content), http://stakeholders.ofcom.org.uk/broadcasting/guidance/

> Ofcom "Social Networking – A quantitative and qualitative research report into attitudes, behaviours and use", http://stakeholders.ofcom.org.uk/market-data-research/media-literacy/ medlitpub/medlitpubrss/socialnetworking

Annex B

Review approach to process and engagement

1. Reg Bailey was appointed on 6 December 2010 by the Minister of State for Children and Families, Sarah Teather, to lead the Review and a team of officials from the Department for Education was set up to support him.

2. Reg Bailey was asked to take as his starting point the recent assessment led by Professor David Buckingham and the reviews led by Professor Tanya Byron and by Dr Linda Papadopoulos. He has also met and discussed the issues with all three during the course of the Review.

3. To update the evidence in this area since the work in paragraph 2 was undertaken, Reg Bailey commissioned from the Childhood Wellbeing Research Centre (CWRC) a rapid review of literature available since 2008 on the commercialisation and sexualisation of childhood and a summary of regulatory frameworks in four other countries. The findings are available on the CWRC website: http://www.cwrc.ac.uk/projects.html

4. The Review has sought to put the parents and children and young people at the heart of its work and to make sure that their opinions are reflected. This has been done in a number of ways:

    > An online Call for Evidence from parents, grandparents and carers which received 997 responses. The Call for Evidence ran from 11 February to 18 March 2011 and the results are published as an appendix to this report.

    > Qualitative research involving 70 parents was undertaken by Define Research and Insight Ltd. A summary is published as an appendix to this report.

    > A presentation by the Children's Commissioner for England's children and young people's advisory group, 'Amplify', sharing the findings from their online survey of over 500 children and young people across England and their weekend residential workshop focusing on commercialisation issues. Details of the questionnaire and findings are available on their website: http://www.childrenscommissioner.gov.uk/content/publications/content_493

    > A submission from the Department for Education's Children and Youth Board, summarising the findings of a workshop about commercialisation and sexualisation, held at their residential meeting and facilitated by the National Children's Bureau.

> A face-to-face omnibus survey, carried out with 1,025 parents of 5-16 year-olds in the UK and 520 children and young people aged 7-16 in Great Britain between 16 February and 13 March 2011 by TNS Omnibus, with data weighted to be nationally representative. A summary of the findings is published as an appendix to this report.

5. Gathering evidence and views from a diverse range of stakeholders has been a crucial element of the Review. Examples of the positive enagagement of so many to this Review include:

> Launching a Call for Evidence from industry and wider stakeholders, from 11 February to 18 March 2011 which received 120 responses. A list of respondents can be found at Annex D of this report.

> Holding meetings with over 40 stakeholders, (retail, advertising, manufacturers, broadcasters, internet service providers, regulators, academics, and parenting experts). A full list of organisations and individuals interviewed can be found at Annex C of this report.

6. Reg Bailey was supported by a group of critical friends: Professor Agnes Nairn, Professor Stewart Purvis, Professor Patrick Barwise, Sue Palmer and James Best who offered expertise and challenge, and acted as a sounding board for emerging ideas.

7. Professor Ann Phoenix, June Statham and colleagues at CWRC, together with members of the Research Strategy Team at the Department for Education, have provided ongoing assistance in evaluating research and evidence.

Annex C

Interviews for this Review

Advertising Association

Advertising Standards Association

Asda

Authority for Television on Demand

BBC

Box Music Ltd

British Retail Consortium

British Toy and Hobby Association

Brook

BSkyB

Channel 4

Channel 5

Children's Charities' Coalition on Internet Safety

Children's Society

Clearcast

Consumer Focus

Credos

Department for Education's Violence Against Women and Girls Advisory Group

Dubit Ltd

Facebook

Family and Parenting Institute

Family Lives

Golden Bear Toys

Dr Amanda Gummer

Sheena Horgan

Hornby

Internet Advertising Bureau

ITV

John Lewis Partnership

Marks & Spencer

Media Smart

MTV Europe

Mumsnet

Netmums

Next

Ofcom

Office of the Children's Commissioner for England

Teresa Orange

Outdoor Media Centre

Platform 51

Portman Group

Primark

Dr Rachel Russell

Shop Direct Group

Tesco

UK Council for Child Internet Safety, Executive Board

UK Interactive Entertainment

Annex D

Organisations that responded to the Call for Evidence

Advisory Group

Abbeywood Tots Day Nursery

Advertising Association

Advertising Standards Authority

All walks beyond the catwalk

Anti-bullying Alliance

Any-Body.org

'Amplify' – the Children's Commissioner for England's Children and Young People's Advisory Group

Arnold Middle School

Association of News Retailing

Association of Teachers and Lecturers

Barnardo's

BBC

Beat

Beatbullying

Bedfordshire Scouts

Bristol Fawcett

British Board of Film Classification

British Council of Shopping Centres

British Heart Foundation

British Humanist Society

British Psychological Society

British Retail Consortium

Broadheath Primary School

Brook

Campaign for Body Confidence

CARE

Catholic Education Service for England and Wales

Central Bedfordshire Council

Centre for Gender and Violence Research, University of Bristol

Channel 4

Channel 5 Broadcasting Ltd

Chapel Break Infants

Childnet International

Children in Scotland

Children's Commissioner for England

Children's Radio

Church of Scotland Guild

Consumer Focus

Dialdruglink

Dubit

Durham University

Educare

Educare Small School

Education Consultant

End Violence Against Women Coalition

Family and Parenting Institute

Family Education Trust

FPA

George at Asda

Girlguiding UK

Gorse Ride Junior School

Health Visitor, Leicestershire

Homecall UK

Imkaan

Incorporated Society of British Advertisers (ISBA)

Kent County Council

Kids Industries

Kings Norton Parochial Church Council

Lucy Faithfull Foundation

Mayor of London

Media Smart

Microsoft

Mothers' Union

National Board of Catholic Women

National Council of Women

National Schools Partnership

NHS Bristol

Nickelodeon UK

Nottinghamshire Domestic Violence Forum

NSPCC

OBJECT (endorsed by 15 other organisations)

Perthshire Rape Crisis

Pinkstinks

Platform 51

Play Wales

Portman Group

RadioCentre

Safermedia

Deirdre Saunders

Savana

School's Out

Scottish TUC

Scottish Women's Convention

Sex Education Forum

Sheffield Hallam University

South Essex Rape and Incest Crisis Centre

Stirling Women's Aid

Teen Boundaries UK

Templemoor Infant School

The Front Page Campaign

The King's School

The nia project

Trent CE Primary School

TUC

UK Council for Child Internet Safety Evidence Group

UKTV

Women's Aid

Women's Support Project

YWCA Scotland

Annex E

Bibliography

Advertising Association, 2011. *Parents, children and the commercial world: Facts, issues and solutions – The Advertising Association's contribution to the Bailey Review* [Online.] http://www.adassoc.org.uk/aa/index.cfm?LinkServID=D3F6B4F6-5056-9C00-4ED4503AB7BE42F9&showMeta=0 [Accessed on 17 May 2011]

Advertising Standards Authority, 2008. *ASA Annual Report 2008* [Online.] http://www.asa.org.uk/About-ASA/Annual-Report.aspx [Accessed on 11 May 2011]

Advertising Standards Authority, 2011 (1). *Children and Advertising – the work of the Advertising Standards Authority*. Unpublished paper submitted to the Bailey Review.

Advertising Standards Authority, 2011 (2). [Online.] http://www.asa.org.uk/ [Accessed on 11 May 2011]

Advertising Standards Authority, 2011 (3). *ASA Annual Report 2010*, [Online.] http://www.asa.org.uk/About-ASA/Annual-Report.aspx [Accessed on 17 May 2011]

Alcohol Concern, 2010. *Overexposed – Alcohol Marketing during the World Cup* [Online.] http://www.alcoholconcern.org.uk/publications/other-publications/overexposed [Accessed on 11 May 2011]

Attwood, F., ed., 2009. *Mainstreaming Sex: The Sexualization of Western Culture*, I.B Tauris

BBC, 2009. *Taste, Standards and the BBC: Public attitudes to morality, values and behaviour in UK broadcasting* [Online.] http://www.bbc.co.uk/aboutthebbc/reports/index.shtml [Accessed on 11 May 2011]

Buckingham, D.,Willett, R., Bragg, S., Russell, R., 2010. *External research on sexualised goods aimed at children*. Report to Scottish Parliament Equal Opportunities Committee, SP Paper 374

Byron, T., 2008. *Safer Children in a Digital World: The report of the Byron Review 2008*. DCSF

Byron, T., 2010. *Do we have safer children in a digital world? A review of progress since the 2008 Byron Review*. DCSF

CHECK: Children's Ethical Communications Kit website [Online.] www.check.uk.com

Child Exploitation and Online Protection Centre. [Online.] http://www.ceop.police.uk [Accessed on 11 May 2011]

Childnet International [Online.] http://www.childnet.com [Accessed on 11 May 2011]

Children and Youth Board Residential Report on Commercialisation and Sexualisation, DfE/NCB, February 2011. Unpublished paper submitted to the Bailey Review.

Children's Commissioner for England and Amplify – the Children's Commissioner's children and young people advisory group, 2011. *Children, young people and the commercial world*. Response to the Bailey review Call for Evidence. www.childrenscommissioner.gov.uk/content/publications

Children's Charities' Coalition on Internet Safety, 2010. Briefing on the internet, e-commerce, children and young people. [Online.] http://www.chis.org.uk/2010/11/08/briefing-on-the-internet-e-commerce-children-and-young-people [Accessed on 11 May 2011]

Credos, 2011. *Attitudes to Advertising, A survey of the public conducted by Comres on behalf of Credos*. http://www.credos.org.uk/index.php

Darlington, R., et al, 2011. *Through the Looking Glass*, Demos [Online.] http://www.demos.co.uk/publications/throughthelookingglass [Accessed on 13 May 2011]

DCSF/DCMS, 2009. *The Impact of the Commercial World on Children's Wellbeing: Report of an Independent Assessment for the Department for Children, Schools and Families and the Department for Culture, Media and Sport*. DCSF

Define Research & Insight Ltd, 2011. Parents' Voice Qualitative Research: executive summary. Published as an appendix to this report at www.education.gov.uk

Department for Business, Innovation and Skills and Cabinet Office, 2011. *Better Choices: Better Deals – Consumers Powering Growth*. BIS

Directgov (1). Click clever, click safe [Online.] http://clickcleverclicksafe.direct.gov.uk/index.html [Accessed 11 May 2011]

Directgov (2). Consumer rights [Online.] http://www.direct.gov.uk/en/Governmentcitizensandrights/Consumerrights/index.htm [Accessed on 11 May 2011]

Fielder, A., Gardner, W., Nairn, A. and Pitt, J., 2008. *Fair Game? Assessing commercial activity on children's favourite websites and online environments,* National Consumer Council

Flood, M., 2009. The Harms of Pornography Exposure among Children and Young People. *Child Abuse Review Vol. 18*. Published online in Wiley Science http://onlinelibrary.wiley.com/doi/10.1002/car.1092/abstract

Girlguiding UK, 2008. *Teenage mental health: Girls shout out! A research report by Girlguiding UK* [Online.] www.girlguiding.org.uk/pdf/GSO-TeenageMentalHealth.pdf

Goldstone, N. and Slesenger, D., 2010. *Discriminatory Language Research,* BBFC [Online.] www.bbfc.co.uk

Hamilton, J., 2010. Tesco micro school skirts for girls of 9. *The Sun* [Online.], 6 August 2010. http://www.thesun.co.uk/sol/homepage/news/3083850/Tesco-micro-school-skirts-for-girls-of-9.html [Accessed on 11 May 2011]

Hans Bredow Institut, 2006. *Final Report. Study on co-regulation measures in the media sector.* Study for the European Commission, Directorate Information Society and Media Unit A1 Audiovisual and Media Policies [Online.] http://ec.europa.eu/avpolicy/docs/library/studies/coregul/final_rep_en.pdf [Accessed on 11 May 2011]

HM Government, 2010. *The Coalition: our programme for government,* Cabinet Office

Internet Advertising Bureau (1), 2011. [Online.] http://www.iabuk.net/en/1/adspendbreaks4billionmilestone280311.mxs [Accessed on 11 May 2011]

Internet Advertising Bureau (2). [Online.] http://www.iabuk.net/en/1/onlinebehaviouraladvertisingexplained.html [Accessed on 11 May 2011]

John, D. R., 1999. Consumer Socialization of Children: A Retrospective Look at Twenty-Five Years of Research. *Journal of Consumer Research*, Vol 26, No 3

Keep, G., 2004. *Hard sell, soft targets? Parents talk about marketing to children.* Family and Parenting Institute

Keller Fay Group, 2011. *New UK Research on Online and Offline Word of Mouth,* presentation to Word of Mouth Marketing Association

Lazzeri, A. and Spanton, T., 2011. Store's padded bras for girls of 8. *The Sun* [Online.], 14 March 2011. http://www.thesun.co.uk/sol/homepage/news/3464822/Matalans-padded-bras-for-girls-of-8.html [Accessed on 11 May 2011]

Livingstone, S., Haddon, L., Görzig, A. and Ólafsson, K., 2010. *Risks and safety for children on the internet: the UK Report.* London School of Economics, London: EU Kids Online

Market Research Society, 2010. *MRS Regulations for Using Research Techniques for Non-Research Purposes* [Online.] http://www.mrs.org.uk/standards/downloads/2010-11-29%20Using%20research%20techniques%20for%20non%20research%20purposes.pdf [Accessed on 12 May 2011]

Marketing Magazine, 2011. *Marketing To Children Conference: Appeal To Kids & Sell To Parents. Delivering engaging & ethical marketing campaigns based on current buying & behavioural trends, media consumption habits & regulatory guidelines.* Haymarket Events, 22 June 2011

Mayo, E. and Nairn, A., 2009. *Consumer Kids: How Big Business Is Grooming Our Children for Profit,* Constable, London

Ministry of Education, Argentina. Media literacy materials for parents (*Material de capacitacion – internet en familia 1 & 2, la television en familia 1 & 2, los adolescentes y las redes sociales*) [Online.] www.me.gov.ar/escuelaymedios [Accessed on 13 May 2011]

Mothers' Union, 2010. [Online.] http://muenterprises.org/byebuychildhoodmu/ [Accessed on 11 May 2011]

Mumsnet (1). [Online.] http://www.mumsnet.com/campaigns/retailers-changing-lads-mags-displays [Accessed on 11 May 2011]

Mumsnet (2). [Online.] http://www.mumsnet.com/campaigns/let-girls-be-girls [Accessed on 11 May 2011]

Nairn, A., 2008. *Business Thinks Family,* Family and Parenting Institute

Nairn, A. and Fine, C., 2008. Who's Messing with My Mind? The Implications of Dual-Process Models for the Ethics of Advertising to Children. *International Journal of Advertising*, Volume 27, Number 3, pp.447-470

Nairn, A., Bottomley, P., and Ormrod, J., 2010. Those Who Have Less Want More: But Does it Make Them Sad? An Exploration of the Links Between Deprivation, Materialism and Wellbeing. In D Buckingham and V Tingstad, ed. 2010. *Childhood and Consumer Culture*, Palgrave Macmillan, Basingstoke

Nairn, A. and Ormrod, J., with Bottomley, P., July 2007. *Watching, Wanting and Wellbeing: exploring the links – a study of 9 to 13-year-olds,* National Consumer Council

National Federation of Retail Newsagents, 2011. *NFRN Advice on Magazine Display* [Online.] http://www.nfrnonline.com/download/1438/NFRN-Advice-on-Magazine-Display.doc [Accessed on 11 May 2011]

Nikunen, K., Saarenmaa, L., Paasonen, S., 2007. *Pornification: Sex and Sexuality in Media Culture*, Berg

NSPCC, 2011. *Premature sexualisation: understanding the risks. Outcomes of the NSPCC's expert seminar series* [Online.] http://www.nspcc.org.uk/Inform/policyandpublicaffairs/consultations/2011/premature_sexualisation_wda81597.html [Accessed on 23 May 2011]

Ofcom, 2010. Ofcom Media Tracker [Online.] http://stakeholders.ofcom.org.uk/market-data-research/statistics/ [Accessed on 11 May 2011]

Ofcom, 2011 (1). Ofcom Broadcast Bulletin, Issue 180 20 April 2011 [Online.] http://stakeholders.ofcom.org.uk/binaries/enforcement/broadcast-bulletins/obb180/obb180.pdf [Accessed on 11 May 2011]

Ofcom, 2011 (2). Ofcom UK Children's Media Literacy [Online.] http://stakeholders.ofcom.org.uk/binaries/research/media-literacy/media-lit11/childrens.pdf [Accessed on 11 May 2011]

Opinion Leader, 2009. *Attitudes towards sexual material on television: A qualitative research report for Ofcom* [Online.] http://stakeholders.ofcom.org.uk/binaries/consultations/bcode09/annexes/sextv.pdf [Accessed on 11 May 2011]

Outdoor Media Centre Limited, 2011. *Outdoor Media Centre Charter – Standard Of Best Practice 2011* [Online.] http://www.outdoormediacentre.org.uk/outdoor_media/policy/Charter__Standard_of_Best_Practice [Accessed on 11 May 2011]

Papadopoulos, L., 2010. *Sexualisation of young people review*, Crown Copyright

Phoenix, A., 2011. *Review of recent literature for the Bailey Review of Commercialisation and Sexualisation of Childhood*, Childhood Wellbeing Research Centre. http://www.cwrc.ac.uk/projects.html

Pitt, J., 2010. *A tangled web: Marketing to children*. Consumer Focus [Online.] http://www.consumerfocus.org.uk/files/2010/10/A-tangled-web-for-web.pdf [Accessed on 11 May 2011]

Press Complaints Commission, 2011. [Online.] http://www.pcc.org.uk/complaints/process.html [Accessed on 11 May 2011]

Reichert, T., sexinadvertising.com [Online.] http://sexinadvertising.com/ [Accessed on 11 May 2011]

Rubin, C. et al., 2009. Timing of maturation and predictors of menarche in girls enrolled in a contemporary British cohort, *Paediatric and Perinatal Epidemiology*, Volume 23, Issue 5, pp. 492–504

Russell, R. and Tyle, M., 2005. Branding and Bricolage: Gender, consumption and transition. *Childhood*, Vol 12 (2): pp.221–237

Scott, S. and Jackson, S., 2004. Sexual Antinomies in Late Modernity, *Sexualities*. 7.2, pp. 233-248

Scottish Parliament, 2011. *Compliance with guidelines on the display of sexually graphic magazines,* research paper [Online.] http://www.scottish.parliament.uk/s3/committees/petitions/petitionsubmissions/sub-08/Research_report_final.pdf [Accessed on 11 May 2011]

Statham, J., Mooney, A., Phoenix, A., 2011. *Commercialisation and premature sexualisation of children: regulatory frameworks in selected international countries,* Childhood Wellbeing Research Centre. http://www.cwrc.ac.uk/projects.html

Stecklow, S., 2010. On the Web, Children Face Intensive Tracking. *Wall Street Journal,* 17 September 2010 [Online.] http://online.wsj.com/article/SB10001424052748703904304575497903523187146.html [Accessed on 11 May 2011]

Teenage Magazine Arbitration Panel, 2011. [Online.] http://www.tmap.org.uk/ [Accessed on 11 May 2011]

TNS Omnibus Survey, 2011. Survey of parents of children aged 5-16 in the UK and of children and young people aged 7-16 in Great Britain for the Bailey Review [Online.] www.education.gov.uk

UK Council for Child Internet Safety [Online.] http://www.education.gov.uk/ukccis [Accessed on 11 May 2011]

Valkenburg, P. M., and Buijzen, M., 2005. Identifying determinants of young children's brand awareness: Television, parents and peers. *Journal of Applied Developmental Psychology*, Vol 26, Issue 24, pp.456-468

Word of Mouth Marketing Association. [Online.] http://www.wommauk.org/index.php/about.html [Accessed on 11 May 2011]

Young, B., 2010. Children and advertising. In Marshall, D., ed. *Understanding Children as Consumers*. Sage, London

Your Online Choice. [Online.] http://www.youronlinechoices.com/ [Accessed on 11 May 2011]

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