Agnes Nairn

was a market research practitioner for many years before becoming an academic researcher and writer. She is based in the UK but is affiliate Marketing Professor at EM Lyon Business School and Visiting Marketing Professor at RSM Erasmus University in the Netherlands. Her research focuses on issues relating to children's marketing and she has published in a wide range of international journals.

Alexander Dew worked on this paper as part of his dissertation, while studying for a Masters degree at the University of Bath. Having achieved this he is now a Foundation Professional and works for IBM in sales and marketing.

Keywords: children, advertising, online, ethics, adver-games, regulation

Agnes Nairn
UPR Marches et Innovation
EM Lyon Business School
23 Avenue Guy de Collongue
Ecully 69132, France
Tel: +44 7796 585449
E-mail: Nairn@EM-Lyon.com

Pop-ups, pop-unders, banners and buttons: The ethics of online advertising to primary school children

Agnes Nairn and Alexander Dew

Received: 1 May 2007

Abstract

The growth in children's access to the internet has led to the development of thousands of child-oriented websites, many of them heavily laden with commercial promotion. This has led interest groups, parents and lobbyists to question the ethics of targeting children through this new medium and some have even called for it to be banned. This paper examines the evidence behind these concerns, gives an overview of the codes currently in place to regulate online advertising to children and presents a review of the commercial practice on some of the websites currently popular with UK primary school children aged 9–11. Most of the sites accessed by today's children are not specifically targeted at them. This means that advertising tends to be for products not used by children. While most of these adverts are irrelevant rather than harmful, the fast-evolving interactive formats of online advertising, however, give cause for concern. In particular, half of adverts (particularly adver-games) are not clearly labelled as such; signposting from host sites to an advertiser's site is poor; and there is significant use of popular children's characters to incite sales. All of these practices are potentially deceptive for children below senior school age who may find it hard to distinguish persuasive intent from entertaining content in the current online environment. There is thus a strong case for site owners, advertisers and self-regulatory bodies to work together to ensure that sites are aware of the audience they are attracting and that they make it easy for children to understand quite clearly the difference between what is designed to entertain and what is designed to persuade.

Journal of Direct, Data and Digital Marketing Practice (2007) **9**, 30–46.
doi:10.1057/palgrave.dddmp.4350076

Background

The growth in children's access to the internet has led to the development of thousands of child-oriented websites that 'offer novel opportunities to target this young audience'.¹ Many sites are thus heavily laden with commercial promotion² and estimates suggest that

**Definition of
'inappropriate'
advertising**

two-thirds of websites designed for children rely on advertising for their primary revenue.¹ Indeed, Neuborne (p. 108)³ estimates that only 2 per cent of children's websites carry no advertising content. In response, lobbyists have voiced concerns over the ethical implications of internet marketing strategies aimed at children.^{4,5} The level of discontent from campaigners and parents alike⁶ is so great that many critics argue that the use of advertising on the internet targeting children is 'exploitative' and should therefore be banned.⁴

There is much debate surrounding the definition of 'inappropriate' children's advertising. Davidson⁷ cites children's exposure to 'sin' products, such as gambling, alcohol or pornography as 'inappropriate' and his assertion is backed by legislation from the Advertising Standards Authority (ASA).⁸ Few would disagree. There is also general censure for adverts showing children in potentially hazardous situations or in provocative sexual poses. The case for harm is, however, much less clear cut when arguments are put forward on the grounds of cognitive psychology. It is argued that at least some advertising techniques can also be defined as 'inappropriate' if children are not capable of understanding their persuasive intent,⁴ or of differentiating entertaining content from marketing, especially 'where content and advertising are seamlessly integrated'.⁶ From this perspective, the fundamental issue of what is 'appropriate' for children is a highly emotive topic and one that is currently ambiguously defined. It is therefore worth briefly reviewing some of the evidence.

**Most psychological
work on advertising
to children has been
conducted in the
context of television
advertising**

The cognitive and social development of children

Most of the psychological work on advertising to children, has, of course, been conducted in the context of television advertising. It has been argued for decades that both ability to distinguish advertising from programme content and the skills required to understand persuasive intent are primarily driven by age-related cognitive function. These assumptions rest firmly on the work of developmental psychologist Jean Piaget⁹ who proposed that children's cognitive capacity evolves biologically through a series of pre-determined stages from birth to adulthood. In the social psychology field, Selman¹⁰ has argued that 'social perspective taking' and 'impression formation' are the two most important aspects in understanding children's social development, which are also important in understanding how children process advertising. Social perspective taking (the ability to see perspectives beyond one's own) is strongly related to purchase influence and negotiation. Impression formation (the construction of social comparisons) is also strongly related to understanding the social aspects of products and consumption. In the marketing field, Deborah Roedder John's¹¹ highly influential review of a 25-year body of literature on the 'consumer socialisation of children' has more recently consolidated the ideas of Piaget and writers such as Selman in proposing a three-stage process through which children mature, evolve and become socialised into a consumer world: the 'perceptual' stage (age 3–7), the 'analytical' stage (age 7–11) and the 'reflective' stage

‘Cued processors’

**At what age is it ‘fair’
to direct television
advertising to
children?**

(age 11–16). In the first stage children understand their universe in terms of what is readily observable and tend to focus on a single dimension at a time. Children of this age have difficulty in thinking about their own perspective and that of another person simultaneously (John, p. 187).¹¹ The analytical stage (7–11) is a period of huge change for children’s development during which they begin to appreciate more abstract concepts such as value for money and start to develop understanding of advertisers’ intentions. Children of this age are also called ‘cued processors’¹² as, although they may possess abstract knowledge about, for example, the role of advertising in society, they need cues (such as clearly labelled adverts) in order to be able to retrieve this information. After the age of 11, children’s processing capabilities become much more strategic and they begin to understand another person’s perspective as it relates to the social group or system to which that other person belongs.¹⁰ After entering senior school most children start to appreciate complex notions of a market economy, the social significance of brands and can also start to develop some scepticism towards claims made by advertisers (eg appreciate that a celebrity is being paid to endorse a product).

The pioneering work on understanding the ethical implications of television advertising to children was conducted in the 1970s and 1980s (eg Rossiter and Robertson,¹³ Blatt *et al.*,¹⁴ Roberts¹⁵ and Macklin¹⁶). Indeed, Wright *et al.*¹⁷ note that the vast majority of studies on children and marketing were carried out during a 15-year period from the early 1970s to the late 1980s; an observation supported by Moore¹⁸ who notes that significantly less research has been carried out in the area since the late 1980s. In line with Piagetian assumptions, the major concern of these researchers was to establish an age at which it is ‘fair’ to direct television advertising to children. The line of argument employed is that if children do not fully understand the persuasive intent of advertising then they are unable to mount a cognitive defence and are therefore at risk of unethical manipulation by advertisers. Research in this field has shown that between the ages of four and five children are capable of distinguishing a television advert from a programme (eg Blatt *et al.* and Levin *et al.*¹⁹). They can tell that adverts are shorter than programmes and contain particular characters or songs. They may, however, not be able to tell at this stage that the actual content of the advert is materially different from the show within which it is embedded — it may all just be seen as entertainment.²⁰ It is generally agreed that some eight-year olds are cogniscent of selling intent in adverts^{16,21} but there is some dispute over whether understanding intent automatically implies scepticism towards that intent and a number of researchers believe that it is not until around the age of 12 that children develop a scepticism *vis à vis* persuasive content.²² Moreover, Brucks *et al.*²³ have noted that having the ability to be sceptical does not necessarily mean that such abilities will be engaged, a notion backed up more recently by Moses and Baldwin²⁴ who state that ‘merely having the concepts in some latent form does

Children's exposure to advertising online can be prolonged and continuous

little if anything to prevent children from being led astray by advertising' (p. 197).

So while there is a general consensus that below the age of 12 children's cognitive abilities are really not well-enough developed for them to make unaided assessments about what is designed to entertain and what is designed to persuade, there is still debate over whether even after this age knowledge about the role of advertising in society is enough to engage a child's critical faculties. This evidence is based largely on the context of television advertising. When we apply these psychological concepts to the fast-moving world of internet advertising, it becomes apparent that children have even less psychological protection from potentially deceptive practice, for the online environment is fundamentally different from television. Children's exposure to advertising online can be prolonged and continuous rather than episodic and confined to the commercial break, and it can be interactive, engaging and exciting. The intention behind online advertising can also be fundamentally different from that of television adverts. Viral marketing implicates the child in becoming an active advocate for a product; adver-games create a bond with the brand based on emotions of winning and losing; and the time gap between viewing an advert and purchasing the product can be seconds or minutes online compared with days or weeks with television advertising.

While we still know relatively little about the nature and effects of advertising to children in emerging media environments such as the internet,¹ two types of online advertising have been highlighted as particularly likely to confuse children: adver-games and the use of popular children's characters.

Adver-games

'Adver-games'

'Adver-gaming' is a technique that embeds marketing content into games, so that the game can act as a marketing tool for corporate websites,⁴ typically featuring brands and product placement.²⁵ Adver-games are advertiser-sponsored games that embed brand messages in colourful, fun and fast-paced games,¹ as shown in Figure 1.

Children's understanding of 'adver-gaming' has significant implications in the debate surrounding appropriateness. Most children think that these product-centred games are just games, not mainly advertisements, failing to understand their persuasive intent.¹ The extent to which children can interpret and assess commercial messages in this environment is questionable (*ibid.*). Furthermore, as illustrated by Figure 1, many such games fail to explicitly mark product placement with notices such as 'ADVERTISEMENT' or 'Hey Kids, This is Advertising', which is cited as best practice.⁵ Evidence shows that children are more likely to watch unannounced advertisements than clearly delineated ads.²⁶ This may indicate that they are unable to distinguish commercials from content. As a result, they may be more vulnerable to deception and the case for complying with best practice regulations is strengthened.

Figure 1: Ritz Bits Soccer Shoot Out adver-game

Popular characters

There is evidence to suggest that children understand neither the purpose of product spokespersons or characters that are used to develop personal relationships with them, nor that these characters often provide 'hotlinks' directly to commercial sites.⁶ Children's Advertising Review Unit (CARU,²⁷ p. 8) gives the following guidance in the context of television advertising that:

'Program personalities, live or animated, should not be used to sell products, premiums or services in or adjacent to programs primarily directed to children in which the same personality or character appears.'

'Loyalty' can be exploited

Children can develop strong attachments to characters they encounter on television (eg The Teletubbies), in comics and magazines (eg Dennis the Menace), in books (eg Harry Potter), in movies (eg The Incredibles) and even through pure merchandising (eg Barbie). As children are less able to distinguish fantasy from reality their 'loyalty' to a favourite character can be exploited if that character is endorsing a product. Figure 2 shows Barbie endorsing skates. This endorsement is labelled as advertising, but the label is very hard to spot.

Family and peers

In addition to these potentially confusing advertising formats, campaigners and regulators have also highlighted the responsibility of advertisers not to exploit children's relationships with their parents and peers for commercial ends. Since children may view as many as 40,000 commercials a year,⁶ it is impossible for parents to satisfy every demand for advertised products or brands. In consequence, parental refusals to children's purchase-influence attempts can lead to family conflicts²⁸ and place a strain on family relationships. CARU²⁷ states 'Advertising should not urge children to ask parents or others to buy products. It should not suggest that a parent or adult who purchases a

Figure 2: Barbie endorses her skates

product or service for a child is better, more intelligent or more generous than one who does not' (p. 2c). CCFC⁶ asserts that marketers often 'use children's desire to fit in with their peers and tendency to rebel against authority figures'. In some circumstances this can be considered inappropriate as it exploits developmental and social vulnerabilities, especially in cases where marketers encourage a sense of inferiority in children who do not own the product.⁸

The research highlighted above has all contributed to the formulation of regulations on advertising to children. Most of these regulations have been implemented in the context of television advertising including cases such as Sweden where the research of Bjurström²² led directly to the banning of television advertising to the under 12s. We turn now to the current regulatory environment for online advertising to children.

Current regulation of online advertising to children

Regulatory environment

In line with worldwide efforts to make the internet a safe place for children, the marketing industry has made some moves to provide guidelines to companies targeting children online. Advertising on the internet (as in other media) is currently self-regulated and a number of national and international codes now exist to guide responsible practice. Acting to ensure that existing codes are understood and implemented in a uniform manner across Europe, The European Association of Communications Agencies (EACA)²⁹ provides comprehensive ethical guidelines for advertising to children, while the major UK provisions appear in Section 47 of the ASA's⁸ CAP Code; and Sections 8.11–8.23 and 19.25–19.34 of the Direct Marketing Association's (DMA)³⁰ code. In the USA, the CARU²⁷ provides a thorough self-regulatory programme for advertising to children in any medium. The International Chamber of Commerce (ICC)³¹ oversees codes across the world.

While there are some variations in the detail of the regulation, the thrust of all codes is based on the Piagetian assumption that children's cognitive capacity and social experience are generally more limited than most adults' and they proceed on the premises that it is therefore the duty of commercial companies not to take advantage of children's vulnerabilities in terms of limited understanding of either message content or the social implications of a purchase. Codes cover two broad

Clear distinction between advertising and programme/ editorial content

areas: advertising content and advertising labelling. In terms of content, guidelines generally agree that adverts should not deceive children in terms of what the product can deliver, should not show dangerous situations that could be copied, should not contain inappropriate sexuality or violence, should not damage children's relationships with their parents or their peers and should not make children feel bad about themselves for not purchasing the advertised product or service. In terms of labelling, codes state that adverts should be clearly labelled as such; links from the host site to an advertiser's site should be well signposted; characters (celebrities or cartoon characters) should not provide links to commercial sites; and the words 'only' or 'now' should not be used to imply artificial scarcity or urgency to hasten a purchase. Perhaps the most important feature of the codes is their specification that there should be a very clear distinction between advertising and programme or editorial content. As we have seen above, this is a particularly important issue on the internet where there is no standard or easily discernible time slot for commercial breaks as there is on television.

The key features of content and labelling guidelines are summarised in Tables 1 and 2.

While these guidelines do exist, we have very little idea of how effective they are or even how widely they are implemented. We currently only have a very sketchy knowledge of the frequency with which children are exposed to different forms of commercial online activity and little research has so far been conducted to assess which formats children of different ages can and cannot distinguish from content. Likewise little is known about whether children understand online persuasive intent. We are particularly lacking in research on children during that crucial 'analytical' phase between the ages of seven and 11.

Study purpose and design

The research presented below was designed to make a preliminary assessment of the scope of advertising formats encountered by UK junior school children (7–11) and to ascertain compliance with current codes. A list of 50 websites popular with children in this age group

Table 1: Guidelines for content of on-line advertising to children

On-line advertising to children. Guidelines for <i>Content</i> .	
1.	Do not show situations which are hazardous or could result in physical, mental or moral harm to children.
2.	Do not show inappropriate sexual or violent material in advertising to children.
3.	Do not advertise products which are illegal for children.
4.	Do not drive a wedge between children and their parents by encouraging pester power.
5.	Do not imply that a product will result in greater acceptance by peers by conferring qualities of bravery, loyalty or superiority.

Source: Advertising Standards Authority (ASA), Direct Marketing Association (DMA), Children's Advertising Review Unit (CARU), European Association of Communications Agencies (EACA) and International Chamber of Commerce (ICC).

Table 2: Guidelines for labelling of on-line advertising to children

On-line advertising to children. Guidelines for <i>Labelling</i> .	
1.	Advertising should be distinct from content.
2.	Advertising should be labelled as such.
3.	Links from host site to advertiser's site should be clearly signposted.
4.	Adverts should not imply artificial scarcity or urgency using labels such as 'now' or 'only'.
5.	Programme characters or celebrities should not signpost links to commercial sites.
6.	Characters should not endorse product where they are part of adjacent entertainment.

Source: Advertising Standards Authority (ASA), Direct Marketing Association (DMA), Children's Advertising Review Unit (CARU), European Association of Communications Agencies (EACA) and International Chamber of Commerce (ICC).

Table 3: Top 50 websites by use of children aged 9–11 (UK survey)

Rank order	URL	Rank order	URL
1	www.bbc.co.uk	26	www.cheatplanet.com
2	www.miniclip.com	27	www.newgrounds.com
3	www.runescape.com	28	www.popcap.com
4	www.google.com	29	www.mousebreaker.com
5	www.teagames.com	30	www.dressupgames.com
6	www.freewebs.com	31	www.bebo.com
7	www.disney.co.uk/disneychannel	32	www.mary-kateandashley.com
8	www.msn.com	33	www.warhammeronline.com
9	www.ebay.com	34	www.thesimpsons.com
10	www.yahoo.co.uk	35	www.swapitshop.com
11	www.piczo.com	36	www.storymaker.com
12	www.smashinggames.com	37	www.southparkstudios.com
13	www.habbohotel.co.uk	38	www.shockwave.com
14	www.myscene.com	39	www.rspb.org.uk
15	www.cartoonnetwork.com	40	www.leukespellen.be
16	www.123spill.no	41	www.gameworkshops.com
17	www.nick.com	42	www.funnygames.co.nz
18	www.totallytracybeaker.com	43	www.bratz.com
19	www.neopets.com	44	www.beanotown.com
20	www.diddl.com	45	www.battleon.com
21	www.albinoblacksheep.com	46	www.barbie.com
22	www.citv.co.uk/	47	www.smile.com
23	www.Streaming-Clips.com	48	www.hotmail.com
24	www.puffgames.com	49	www.harrypotter.com
25	www.bearfactory.com	50	www.stardoll.com

was derived from a question asking children to list their favourite websites, which was placed in a larger survey.³² The total survey sample was over 500 children aged 9–13 from six very different schools based in Bath, Bristol and South Wales. From this, a list of the top 50 sites from the primary school children only (250 children from three schools) was compiled. Children of this age were selected because they are at an important stage of their cognitive development and because their socialisation as consumers is not yet complete,¹¹ they are less likely to understand persuasive intent and are more susceptible to advertising³³ than older children. The sites are listed in Table 3. Given the fast evolution of sites, this top 50 could well have changed in the months since the survey was completed, but such is the nature of

Survey

Table 4: Types of site popular with 9–11 year olds

Type of site	Names	%
For children	Disney, Nickelodeon, Stardoll, CartoonNetwork, Barbie, MyScene, Diddl, Tracy Beaker, Mary-Kate and Ashley, Bearfactory, BeanoTown, Bratz, Swapitshop, Harry Potter, Habbo Hotel, Neopets	32
Online games	Miniclip, Runescape, Teagames, Mousebreaker, Smashinggames, Funnygames, Dressupgames, Gameworkshop, Popcap, Puffgames, 123Spill, Shockwave, Battleon	26
Entertainment	Funnyjunk, Newsgrounds, Cheatplanet, The Sims, StreamingClips, Msndollz, AlbinoBlackSheep	14
Social networks, messaging	Bebo, Piczo, Freewebs, MSN, Hotmail	10
Other	EBay, RSPCA, Warhammer, Leukespellen, Smile	10
General audience TV	BBC, ITV, The Simpsons, South Park	8

research on the internet. It is also possible that children in other parts of the country may have listed different sites. Research from ChildWise,³⁴ however, indicates that the viewing habits of our sample are not significantly different from the national population as a whole and we are thus satisfied that these sites are accessed by very large numbers of children across the UK.

The list of sites was sorted into groups according to purpose, content and target audience (Table 4). Just under a third are sites specifically aimed at children. Of these almost all are related to popular characters from television, comics, books or toys. The exceptions are the two virtual world children's sites, Habbo Hotel and NeoPets. This means that two-thirds of the sites accessed regularly by primary school children are also intended for an adult audience. The most popular of these are the online gaming sites such as Miniclip and Mousebreaker and the entertainment sites such as Funnyjunk. It is likely that You Tube will now be among the favourites. Social network sites are also mentioned although these have a minimum age of 13, and a number of foreign games search sites such as Smile and Leukespellen also appeared.

Analysis

Analysing all advertising activity on all 50 sites was a task beyond the scope of this paper. Ten sites were selected to represent a cross-section of types of site identified in Table 4. The ten selected were: Miniclip, Teagames, Bebo, South Park, Cartoon Network, Beano Town, Barbie, My Scene, Cheat Planet and Mary-Kate and Ashley. The research took the form of a 'structured observation' of the advertising activity on these sites. The questions used to guide the observation are shown in Appendix A and relate to the summary of guidelines shown in Tables 1 and 2. The first ten adverts encountered on each site were analysed. A few of the surveyed websites used dynamically rotating banner advertisements.³⁵ These advertise a different banner to each viewer by randomly selecting an advertisement from a database pool of advertisements, changing each time the page is refreshed. Where this was the case, the page was refreshed enough times to get ten different

adverts. Some sites contained fewer than ten adverts. In all, 91 adverts were analysed.

Findings

Advertising formats

Figure 3 shows the formats of advertising observed. Three quarters of the adverts were banners of some sort. Banner advertisements were introduced for the first time in 1996 and remain the most popular form of online advertising attracting to click-through to a particular website via a network of partner websites. According to Strauss and Frost,³⁶ banner advertising has been through three stages of evolution: the first stage featured banners that called out ‘click here’, ‘download’ and ‘free’ in vivid colours. In the second stage, Animation GIFs (Graphic Interchange Formats) allowed more mobile and vivid formats of the original banners. The current stage is the fully interactive banner that allows users to play games and select items from drop-down menus. It has long been recognised by marketers that banners and buttons are, however, becoming ineffective as many consumers just ignore them.³⁷ Whether children also ignore them is yet to be tested. The remaining quarter of adverts included less-obvious forms of advertising and those more likely to deceive children. HTML text, flash, video, adver-games, pop-ups, character sponsored and photo adverts were all used.

Products/services advertised

Table 5 shows the products being advertised on sites favoured by primary school children.

In line with the fact that most of the sites are for a general audience, a broad range of products and services are advertised: most not

Figure 3: Advertising formats found for 91 adverts on 10 websites popular with 9–11-year olds (UK survey)

Table 5: Products advertised on sites popular with 9–11 year olds

Product category	No. of ads
Clothing, jewellery, cosmetics	16
Financial services	12
Computer game	10
Toys	9
Telecoms	8
Movie	5
Travel	5
Broadband	4
Books	2
Car	2
Food and drink	2
Console	2
Dating service	2
Search engine	2
Charitable cause	1
Comics and magazines	2
Competition	1
Cosmetic surgery	1
Fax services	1
Home improvements	1
Medical	1
Stationary	1
TV	1

immediately useful to children (eg financial services, cars and many of the clothing, jewellery and cosmetics ads). While most of these adverts are irrelevant rather than harmful, those for credit cards, dating services and cosmetic surgery could be considered inappropriate for children.

Credit cards

Advertisements for credit cards were found on three websites: www.miniclip.com, www.southparkstudios.com and www.teagames.com, an example of which is shown in Figure 4. Bashford³⁸ asserts that advertisers for adult products such as credit cards are now selecting children as their new targets. There may be ethical implications of exposing children to credit card adverts that may foster materialistic attitudes, or increase ‘pester power’, both important issues in the current debate surrounding advertising and children.³⁹

Dating services

An advert for dating services was found on cheatplanet.com, as illustrated by Figure 5. Advertising dating services to children is considered outside acceptable social ‘norms’ and this dating service carried a minimum age limit of 18 years old (flirtomatic.com). Moreover this advertisement was not labelled as such and it did not warn the user before transferring them to the dating service.

Cosmetic surgery

An unlabelled advert for cosmetic surgery was also found on cheatplanet.com. Advertisements for cosmetic surgery may encourage children to become dissatisfied with their image⁴⁰ The advert in Figure 6 used an interactive banner format, which is significant since adverts of

Inappropriate advertising

Figure 4: Credit card advert

Figure 5: Dating advert

an interactive nature can be used to increase exposure time to the underlying message of the advert,⁸ thus increasing the potentially damaging effects. The ASA notes that exposure of children to unregulated interactive adverts containing adult content is one of consumers' greatest concerns (*ibid.*).

Figure 6: Cosmetic surgery advert

Table 6: Reasons for noncompliance with international guidelines

Reasons for noncompliance with international guidelines	%
Host site does not warn that user is leaving the site to go to an advertiser's site	54
Advert not labelled as such (eg 'Ad' or 'ADVERT')	49
Advertising an illegal or legally restricted product	30
Characters endorse products, where the character forms part of the adjacent entertainment.	25
Wording implies artificial scarcity/urgency to hasten a purchase (eg 'Now' or 'Only')	9
Characters provide direct links to commercial sites	5
Advert terminology implies that children will be superior, popular or brave if they buy the product (eg 'Be the best!')	2
Wording encourages pester power (eg 'Get your Mum to buy one!')	<1
Advert shows situations that are hazardous or could result in physical, mental or moral harm to children.	<1
Advert shows inappropriate sexual or violent material in advertising to children.	<1

Compliance with regulations

Table 6 shows the percentage of sites that did not follow each of the principles set down in the major international guidelines for online advertising to children.

In this sample, there were no incidences of adverts showing children in dangerous or compromising positions; no overt attempts to drive a wedge between children and their parents; and very few implications that purchasing a product or service would enhance a child's social position. This much is encouraging for it seems clear that advertisers on sites accessed by children (even if not primarily intended for children) are not jeopardising children's physical or moral well-being for commercial ends and are not using deliberate ploys that could damage children's relationships with their parents or peers. Two urgent issues, however, stand out from this small snapshot of advertising activity. First, current practice does not make it easy for children to tell the difference between advertising and content. Secondly, children are exposed to a significant amount of advertising for products that are illegal for them (financial service products, dating services and cosmetic surgery).

Entertainment versus persuasion

The format of a significant proportion of online advertising encountered by children makes it extremely difficult for them to distinguish between commercial and noncommercial content. In over half of cases, the site owner did not warn the user that they were leaving the host site to visit that of an advertiser; and almost half of the adverts were not labelled

as such. Moreover, a quarter of the adverts used characters that appeared in adjacent content to endorse products and 5 per cent used characters to link to an advertiser's site. As we have seen, children of primary school age are just beginning to develop the cognitive capacity to understand how and why commercial agents may be trying to persuade them to make purchases; and even into senior school years, we are uncertain whether children are able to use the knowledge they have to activate cognitive defence mechanisms. What we do know, however, is that children in the 7–11-year age group need cues to be able to activate the consumer socialisation skills they have acquired. In other words, they need to be told quite clearly when the words, pictures, sounds and images that appear on their screen are attempting to persuade them, sell to them or create an impression for commercial ends. Over half of the adverts in this sample fail to convey this vital information.

Advertising for 'sin' products

Legal age limit products and services

Almost a third of the adverts encountered on these popular children's websites are for products and services illegal for children. While none of these were for 'sin' products such as alcohol, cigarettes, pornography or firearms, many were for products with a legal age limit such as dating, cosmetic surgery and financial services. Current codes of practice do not generally provide guidance for advertising sites that attract both an adult and child audience. An exception to this is the provision set down in Section 54.4 of the ASA CAP code,⁸ which covers betting and gaming: 'No medium should be used to advertise betting and gaming if more than 25 per cent of its audience is under 18 years of age'. This '25 per cent' guideline could usefully be applied to the advertising of other categories of product and service such as dating, surgery, loans and credit cards.

Room for improvement

Conclusions and recommendations

Compliance with codes relating to 'sin' products and to the physical and moral protection of children appears to be good. Compliance with codes relating to the exploitation of children's developing cognitive defence mechanisms, however, appears to be very poor. Specifically, current advertising formats do not enable children to make an easy distinction between content designed to persuade and content designed to entertain. Advertisers are not uniformly labelling their adverts and site owners' are only sporadically signalling movement away from their site to that of an advertiser. The use of popular characters to endorse products and services on sites specifically targeted at children is widespread and contrary to best practice. New techniques such as adver-games, interactive banners and rich text formats are likely to exacerbate this problem by creating online contexts that integrate commercial messages with entertainment and information content ever more seamlessly. It is recommended that site owners, advertisers and regulators work together to address this issue. A uniform format for

labelling advertising might help. Just as in France, for example, all television advertising is preceded and concluded by the words 'PUB' accompanied by set music, internet advertising could be located on a specific part of the page and in a specific font size and colour. Likewise, the signing of a transition from a host site to a commercial partner site could use consistent wording, font size and colour. Owners of children's sites should also reconsider their policies on exploiting children's loyalty to popular characters to incite purchases.

A second issue highlighted by this research is that the majority of sites favoured by children are aimed at a wider, more adult audience. This has resulted in a high proportion of online advertising for products and services, which are not only irrelevant for children but which also carry a legal age limit. These findings present challenges for the industry. It is suggested that the '25 per cent' rule used by CAP on gambling might provide a starting point for thinking about regulation in this area. Sites whose audience is more than 25 per cent under 18 might be encouraged not to advertise products that with legal age limit of under 18.

Acknowledgments

This research is part of a larger ongoing Project with The National Consumer Council and Childnet International.

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Appendix A

Structured Observation Guide

1. Does the advert show situations which are hazardous or could result in physical, mental or moral harm to children?
2. Does the advert show inappropriate sexual or violent material in advertising to children?
3. Does the advert offer products which are illegal for children?
4. Does the advert attempt to drive a wedge between children and their parents by encouraging pester power?
5. Does the advert imply that the product will result in greater acceptance by peers by conferring qualities of bravery, loyalty or superiority?
6. Is the advertising clearly labelled as such?
7. Are links from host site to advertiser's site clearly signposted?
8. Does the advert imply artificial scarcity or urgency using labels such as 'now' or 'only'?
9. Do characters signpost links to commercial sites?
10. Do characters endorse products where they are part of adjacent entertainment?