CHILDREN AND MARKETING LITERATURE

Final Report

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CONTENTS

EXECUTIVE SUMMARY

Introduction

This report was commissioned to examine the overarching question of how the Marketing and Advertising Industries are targeting and engaging children and how this has been changing over time.

We think of childhood as the space where children discover their skills and capacities and learn to be responsible consumers and active citizens without exploitation, or undue exposure, to situations with which they are unable to cope. These aims require both the effective regulation of advertising to children and support for spaces free from commercial promotion and committed to the provision of resources for the cultivation of citizenship. In the past, these goals were secured by clearly separating advertising from content, by the relative exclusion of advertising from schools, and by the provision of a range of publicly funded cultural resources, from play areas to public libraries. The amount and forms of advertising available on television, the major domestic medium enjoyed by children, have been strongly regulated and the BBC has provided children's and school's programming without advertising.

The last decade has seen two major shifts. Firstly, the public spaces used by children have seen an increase in commercial activity. What we are seeing is the extension and reach of **commercial decisions** that shape the environments outside the home that are central to children's development. Secondly, within households we are also seeing the take-up of advertising-supported multi-channel television services, the use of internet in homes and the growth of mobile phone usage among children of all ages. These developments are increasing the volume of the **commercial messages** these groups are exposed to. This report explores these developments.

Key Findings

Chapter 1 Changing Landscapes Of Childhood

- **Historically, childhood has not been a static concept. This has impacted on how marketing and advertising understand and target children.**

Over time, its meaning and definition has changed as a result of major social and political shifts. We have seen the emergence of new 'stages' such as 'teenager', and 'toddlers'. Marketing and advertising have seen these as valid and reliable categories and have developed strategies over time that target these 'new' sub groups. This has seen the emergence of different marketing and advertising strategies for different groups of children.

- **There are potential tensions between encouraging children to be consumers and preparing them for their role as citizens.**

Historically, the expansion of marketing to children in their role as consumers has been accompanied by the development of public cultural resources oriented to

i

inducting young people into their roles as citizens with responsibilities for the overall quality of communal life. The relationship between the 'consumer' and citizenship can create tensions over what role consumption should take in helping children become future citizens.

- **New digital media offer new ways for markets to reach and connect with children.**

In recent years the expansion of new digital media has created new ways for marketing and advertising to access children. It is also the case that the established boundaries drawn between advertising and content are becoming increasingly blurred. In some cases it becomes difficult to separate out what is advertising and marketing and what is entertainment.

Chapter 2 The Privatisation of Public Space

- **Commercial organisations are becoming more involved in schooling through both top-down and bottom-up initiatives.**

Children are encountering both endogenous (top-down) and exogenous (bottom-up) forms of commercialism in public spaces such as schools. Education has seen the importing of private sector techniques to the management and delivery of many of its services (top-down). Evidence also exists that shows schools are engaging more with the commercial sector day to day (bottom-up) through developing new ways of using sponsorship in schools, placing advertising within the school or providing goods and services directly. How far this practice takes place in the UK remains unknown as there are gaps in the available evidence on the extent of schools' involvement across the full range of these areas.

- **There has been a change in the types of play children engage in, which creates new opportunities for marketers and advertisers to connect with children.**

A widening range of play options involving the commercial sector is opening up more spaces for advertisers and marketers to access children. We have also started to see an increased usage of branded leisure locations and events, which provides another avenue for advertisers and marketers to promote their products to children.

Chapter 3 Media Exposure and Expenditure

- **Children now have an expanded choice in their media usage.**

Children have increased access to multi-channel TV and the internet and are increasingly likely to own mobile phones and games consoles. While each media platform individually offers children enhanced choice, with more TV channels and internet sites aimed specifically at children, there has also been an increase in content moving across and between different media platforms. Children can now watch TV via the internet, access the Internet via their mobile phone or go online on their games consoles.

- **Children now have more unsupervised time using new media.**

Children also have much more choice about how they use the media available to them within their home. With many children now having their own TV, games console or computer, they are able to make their own decisions about what they wish to watch, play and access. The question for policy is how best to encourage children to take advantage of this expanded choice while protecting them from harm.

Chapter 4 Integrating Promotion, Cultivating Engagement

- **Recent developments in digital media have facilitated new forms of marketing and advertising.**

The increasing take up of the Internet, mobile phones, and games consoles among children and young people is expanding opportunities to integrate commercial messages into entertainment formats, stimulating the development of new techniques for engaging children and enlisting them in promoting products, and facilitating the development of promotional campaigns that move across and between media platforms.

- **Established marketing techniques remain important.**

The well established techniques of product placement, branding and sponsorship remain major components of advertising and marketing strategies. Commercial sponsorship has expanded especially in relation to sport, bringing commercial messages into the everyday lives of children in a variety of ways.

- **New media offers new opportunities for covert marketing.**

Covert techniques such as using bloggers to promote products and offering advergames on company websites raise regulatory issues around transparency, privacy, and intellectual property.

Chapter 5 Regulation and Responsibility

- **There are gaps in the current regulatory framework.**

While a current co-regulatory system administered by the Advertising Standards Authority has been successful in maintaining compliance in a number of areas, its tendency to rely on complaints to monitor promotional activity means that breaches of the rules may slip through the net.

- **Within the current regulation framework there is confusion over the age banding. Problems also exist in the definition of what constitutes 'children's programming'.**

Within the current regulation framework there is confusion over the age banding with organisations defining childhood differently. Problems also exist in the definition of what constitutes a 'child's programme' with some of the major programmes watched by the young not coming under the regulation framework for children's TV. While

there is a framework for monitoring the quality and quantity of children's TV, maintaining a diversity of original UK production in a competitive commercial environment presents major challenges.

- **Much of the current regulation framework is focused on traditional media.**

Important developments on the internet, such as companies' own web sites, which are a major source of advergames, are not covered by current regulation. In this age of media stacking and interconnection, these developments suggest that the existing regulation framework needs to be expanded to meet challenges ahead.

- **There is limited regulation of sponsorship.**

There is no evidence of a regulation framework for sponsorship. Given that children are avid watchers of sport and other such events, this opens them to a wide range of adverts that may well not be appropriate for their age group. **Concluding Remarks.**

The developments outlined in this report, such as the growth of digital media usage and of diverse methods of targeting children to promote commercial messages indicate that marketing and advertising is becoming both **ubiquitous** in children's lives and more **normalised**. The extent to which this is the case remains unclear, as the detailed evidence is not always available, but it does require us to ask major questions about the society we want to build for the future.

- **How are we going to manage Digital Dynamics?**

The last half-decade has seen major innovations in digital media. This process will continue and may well accelerate. Deciding how best to promote responsible commercial opportunity within this emerging space, while also supporting public cultural institutions in developing and extending services to children which help them to develop fully as citizens, will be a major challenge.

- **A balance needs to be found between Choice and Regulation.**

Today's children are growing up in a media environment that offers them new opportunities for self development, creativity, and contact across geographical borders. The question for policy is how best to encourage children to take advantage of this expanded choice while also protecting them from harm and exposure to material they are not able to cope with adequately.

- **What is the Future of Citizenship?**

Today's children and young people are growing up in a cultural environment in which promotional messages focussed on personal consumption are now ubiquitous. We need to ask whether this has consequences for education in citizenship, designed to encourage a rising generation to think of themselves as members of a moral and political community and to see their future as inextricably linked to the quality of public life.

CHILDREN AND MARKETING LITERATURE

INTRODUCTION

This report was commissioned by the Department of Children Schools and Families as a part of its review into: *The Impact of the Commercial World on Children's Well-Being*. Its core objective has been to review the literature on marketing and advertising while also exploring how children are encountering the commercial world in their everyday lives. The research has been framed by the following questions:

Overarching question

How are the Marketing and Advertising Industries targeting and engaging children and how has this been changing over time?

Key research questions

•   how do children fit into the profile of the marketing and advertising world?
•   what mechanisms and strategies do the Marketing and Advertising Industries use to target children?
•   how are the Marketing and Advertising Industries regulated-what gaps exist and what issues does this raise?

This research explores how these trends have been changing over time and what impact they may be having on children's encounters with the commercial sector. The research focuses on 0-19 year olds. Where evidence is available and in the discussions that follow we use the term children to refer to this age group unless the focus is specifically on older children then we will define them as young people. The report locates the discussion in its historical context although the core discussion draws upon research from 2000 to 2008.

A changing environment?

We think of childhood as a space where children can learn about the world and discover their capacities at a pace adapted to their intellectual and emotional development, and in contexts where they are protected from exploitation and shielded from premature exposure to aspects of the adult world they are not ready to cope with. It involves children becoming aware of their potential and responsibilities as both consumers and citizens. Tensions exist between children as consumers, which foregrounds personal possession and immediate satisfaction, and children as citizens, with an emphasis on shared responsibility for the long term quality of collective social life. We believe that the evidence in this report starts to show that over the last two decades this balance has shifted significantly as a result of three major developments:

- the increasing privatisation of the public spaces at the heart of children's development-schools and play areas-and the growing importance of commercial decisions in shaping these environments;
- the growing centrality of commercial media in the domestic lives of children with the rapid growth and take-up of advertising-supported multi-channel television services and Internet sites; and
- the development of marketing strategies that integrate promotional material into games and other media enjoyed by children and into the flow of their everyday conversation and contact.

These shifts in the media landscape present new challenges to regulatory systems designed to ensure that marketing to children is appropriate and ethical and 'helps create aware consumers rather than exploiting their naivety about the commercial world' (Huntington, 2005:3).

Outline of Report

The report is structured around meeting the key objectives above. It aims to review the evidence on the commercialism that children encounter across a wide range of environments. Our focus is on exploring the existing knowledge about how commercialism and commercial messages are being constructed, produced and then encountered by children in a diverse of settings.

In Chapter 1, we provide the historical context to our discussion, by examining the roots of many of the contemporary developments of commercialism, setting out a brief contextual history of childhood and its relationship over time with commercial activity, and, in particular, with the Marketing and Advertising Industries. In Chapter 2, we start our discussion of contemporary trends by focusing on developments in the public spaces most often used by children. We examine the commercial decisions being made around education and leisure environments and examine the evidence on the ways children are encountering commercialism and commercial messages in schools and play spaces. We then turn our attention to ways children are encountering commercial activity and messages in the private spaces of the home. Chapter 3, focuses on the evidence concerning the growth of children's involvement in multi-channel television, digital media, the Internet and mobile phones. In this discussion we highlight how choice for children has expanded in a variety of ways while, at the same time, increasing their exposure to commercial promotion. In Chapter 4, we examine how marketers and advertisers are drawing on advances in media to develop more flexible strategies for marketing to children. In this discussion, we look at the growing integration of promotion and content, the cultivation of engagement and the development of campaigns that move across and between media. In Chapter 5, we turn our attention to the implications of the shifts we have identified in the media landscape for the current system for regulating advertising to children. In the conclusion, we return to our key objectives to reflect upon the core questions we were asked to consider in this review.

1   CHANGING LANDSCAPES OF CHILDHOOD

1.1   Introduction

In this first chapter we set out a brief historical review of the relationship between childhood and the commercial world, identifying the roots of present trends and practices. In the second part of the chapter we turn our attention to outlining recent developments and identifying the key shifts that are reshaping the media and cultural landscapes in which children encounter the commercial world, drawing attention to the simultaneous privatisation of public space and the rapid growth of commercial media. The chapters that follow examine these developments in detail.

1.2   Childhood, Consumption and Marketing: A brief history

Childhood was institutionalised in Britain as a universal right when the 1878 Factory and Workshops Act removed children under ten from employment and the 1880 Education Act required all children aged 5-10 to attend school, the agency given the central role in teaching basic skills and nurturing children's abilities (Hendrick, 1990). In practice, however, not all children were able to take full advantage of this entitlement as paid employment or care responsibilities essential to the household economies of poorer families interrupted their schooling (Hendrick, 1990). The generalisation of childhood coincided with two major social transformations, the development of a consumer system based on branded goods and display advertising, and the eventual cementation of full adult citizenship based on the universal right to vote.

Schooling was charged with cultivating citizenship, supported and supplemented by a series of other publicly funded institutions that offered children information, experience, and stimulation free of advertising. There were children's rooms in public libraries, children's playgrounds in public parks, dedicated displays in museums, and children's programming as an integral part of public service broadcasting. These initiatives were rooted in an ethos of citizenship that promised universal access to the diversity of cultural resources that children needed to realise their personal potential and contribute actively to public life.

From the outset, children were also very much part of the modern consumer system. They provided a ready market for toys, games and publications designed to fire their imagination and cultivate skills. Boys were offered Meccano sets (first launched in 1901), girls were given mass produced dolls. Public education viewed children as innocents, blank sheets waiting to be written upon by the champions of rationality and sobriety and, therefore, in need of protection from the emotional seductions of street life, popular entertainment and commercial promotion. Marketers, in contrast, saw children less as adults-in-the-making and more as 'inhabitants of a distinctive children's world' that could be shaped and directed (Zelizer, 2002:377).

With their removal from work, children's economic utility was rapidly translated into emotional value (Zelizer, 1985). They offered parents a chance to recapture a sense of wonder and spontaneity beyond the dictates of work, routine, and calculation. This space of desire was 'increasingly filled with the images and values of an emerging consumer culture' and 'childhood wonder and spending on kids became

the same thing' (Cross, 2004:13). Toys, games and publications designed to fire children's imagination proliferated.

In Britain, the arrival of a fully developed consumer society was held back by the Depression, the Second World War and the years of austerity that followed. Arguably, it is not until the mid 1950s with the final end of war-time rationing, rising real incomes, and the introduction of commercial television that it came within the reach of poorer families and children became a genuine mass market. However, the early children's market was substantial enough, particularly in the United States, where much of the thinking driving marketing originated, to provide a basis for increasing segmentation as advertisers and manufacturers tailored products to developmental stages (Hilton, 2003).

From the 1920s onwards marketing and advertising to children grew. Hoardings and walls were covered in posters. Shop window displays invested goods with glamour. Brand names blazed from neon and electric signs. Manufacturers gave away toys and collectibles (such as cigarette cards) with their products. Hollywood child actors followed Shirley Temple in endorsing products and launching their own clothing lines (Cook, 2000:122). The pre-school years emerged as a specialised market in the late 1930's with the invention of the 'toddler' (Cook, 2000) supported by theories of child-centred development which urged parents to respond to the child's own desires (Seiter, 1993). Commercial culture aimed at older children increasingly appealed to their desire for autonomy. From *Just William* to the *Bash Street Kids* it presented social worlds that adults could not enter, populated by rebellious, street-wise, children.

This image of a separate culture was cemented by the discovery of the 'teenager' in the late 1940s. A year after the 1944 Education Act made secondary education mandatory, the American marketer Eugene Gilbert established his Teen Age Services agency in London, to advise firms on the emerging market (Murdock and McCron, 1976:15). Teenagerhood, in turn, generated a 'subteen' market of children, particularly girls, who aspired to emulate teenagers' independence and personhood through consumption (Cook and Kaiser, 2004). Originally focused on girls between 10 and 13, by the late 1980s it had expanded to include eight to 14 year olds and been rebranded as the 'tween' market. Marketers argue that 'tweens' 'have the situation under control [are] well aware of advertisers' intentions [and] very sceptical' (Lindstrom and Seybold, 2003:6). Critics disagree, claiming that research evidence suggests that this age group is still open to undue influence. This division of opinion dominates current debate on appropriate regulatory responses. Advertisers present children as empowered, knowing, and self directed. Critics see them as 'not-yet competent' and exploitable (Cook, 2005:156). Richard Huntington, Director of Strategy for Saatchi and Saatchi in the UK has dramatised this opposition as a struggle between the communications libertarians within the marketing industry and their abolitionist critics in academia and public interest groups:

'The communication libertarians…see children as mini-consumers…their naivety about the commercial world that surrounds them a positive advantage. On the other hand the abolitionists sit in ivory towers…pouring scorn on us…For them children are an extremely vulnerable special interest group whose innocence is being robbed by the marketing community and who must be protected from our manipulation.'

(Huntington, 2005:1-2)

This division is exaggerated here for rhetorical effect, but versions of these positions are frequently articulated in current debate. One side talk of children and young people as 'targets' to be identified, their critics talk of exploitation and deception. For Amy Henry, from the youth marketing consultancy The Geppetto Group, creating a 'buzz' around brands 'can be a great way to…create a connection with young consumers "but" requires a deep understanding of your target' (Henry, 2003:10). For Kathryn Montgomery and Jeff Chester, co-founders of the Centre for Media Education in Washington DC, many of the techniques marketers now use with children and young people 'are exploitative and unfair [and] some may well be deceptive' (Montgomery and Chester, 2007:189).

Beyond their role as a market in their own right children were assigned two additional economic roles by marketers. As the American advertising trade magazine, *Printer's Ink,* pointed out in 1923,

'(they) can have a definite if indirect influence on the sale of products for adult use [and] the child of today becomes the big buyer of tomorrow.'

(quoted in Cook, 2004:73)

These tripartite roles as a *direct* market, an *influence* market, and a *future* market continue to define the scope of children's relations to marketing. Consequently, the question is not simply how marketing promotes products specifically aimed at children but its sheer volume and centrality in cultural life and the role it plays at the centre of children's experience.

Historically, there have been consistent attempts to establish clear boundaries between advertising and editorial matter and programming on the principle that audiences in general and children in particular, needed to know if they were reading or watching something produced solely for information, education or entertainment, or with an intent to sell. To this end, promotional material in newspapers and magazines has been labelled as an 'advertising feature'. Advertising in cinemas has been confined to compilations shown before the main feature. Advertising on commercial television has been restricted to 'natural breaks' before, after and during programmes. These 'Chinese Walls' have not always held firm, however, and marketers have consistently pushed for more opportunities to integrate promotional messages into cultural products rather than being confined to advertising around or alongside them. Product placement has been common practice in Hollywood films, and later television programmes, for decades (Segrave, 2004). Nor has Britain been entirely insulated from this pressure. The early years of ITV saw the production of programme length 'shoppers guides'. Some were advertising features promoting the products of a single company, like Marks and Spencer. Others were advertising

magazines, 'ad mags', incorporating promotion for a range of products, often using popular entertainment formats. This allowed their proponents to argue that they were entertainment rather than advertising, and it was only after a long and bitter debate that they were finally banned in 1962 (Murdock, 1992). In addition, some children's programmes could be classified as 'long form' commercials in the sense that they acted as shop windows for the spin-off merchandise based on the characters, stories and settings.

1.3   Childhood, Consumption and Marketing in Changing Times

Despite these continuities there is no doubt that children are growing up now in an environment that is being substantially altered by a series of shifts that are transforming **what** forms of commercial promotion children encounter, and **how** and **where** they experience and relate to them. Major changes are taking place in media and marketing that are impacting on children's lives.

Firstly, as we will see in the next Chapter, the public institutions outside the home that play a central role in children's development-schools and play areas-which were previously relatively advertising free, are increasingly being privatised and becoming sites for commercial promotion and marketing. Secondly, within the home, the simultaneous expansion of commercial multi-channel television services and advertising-supported internet sites, and their rapid take-up in households with children, has substantially increased the amount of advertising which these groups may see. (see Chapter 3). This volume is increased further still by marketers' increasing interest in mobilising the promotional opportunities offered by the two other major digital technologies children have access to-games consoles and mobile phones.

Yet, the boundaries separating advertising and content have also been under pressure since the early days of modern audio-visual media, but recent years have seen a step change with promotional material becoming increasingly integrated into both cultural products and the flow of everyday interaction (see Chapter 3). UK television has seen a steady relaxation of the rules relating to programme sponsorship, an increase in instances of product placement (despite the continuing regulatory ban), and a substantial expansion of merchandising around children's programmes. Promotional activity has also become a more salient aspect of children's everyday experience and interaction with the rise of branded events and experiences and the expansion of viral marketing (see Chapter 4). While all of these strategies continue to operate within and around established children's media, their centrality and reach has increased as a result of growing the take-up, in recent years, of new digital media, particularly the Internet (see Chapter 3).

Summarising their recent detailed ethnographic research on how young people in the United States are using the Internet, Mizuko Ito and her colleagues stress the technology's potential for self development, creativity and education, arguing that;

'The digital world is creating new opportunities for youth to grapple with social norms, explore interests, develop technical skills, and experiment with new forms of self-expression. These activities have captured teens' attention because they provide avenues for extending social worlds, self-directed learning, and independence.'

(Digital Youth Project 2008)

They point, particularly, to the importance of friendships and outside interests in driving young people's on-line involvement. Opportunities to pursue both have expanded rapidly in recent years.

The first phase of Internet development relied on desk top computers operating over relatively slow dial-up connections with limited capacity, and was dominated by the emergence of the major search engines, Yahoo and Google, and experiments with adapting display advertising. The launch of the second phase (Web 2.0) based on high capacity lap tops, broadband connections, enhanced mobility through Wi-Fi, and the increasing migration of internet capability to mobile phones and digital television, offers marketers new options as applications related to young people's friendships and interests have expanded with the growth of social networking sites and peer-to-peer exchange.

The visibility and centrality of the Internet has led many commentators to nominate it as the defining feature of the emerging promotional environment. The youth market analyst, Martin Lindstrom said, '…living in an interactive world involves children in a whole new way of seeing and thinking' (Lindstrom and Seybold, 2003:3). The distinguished academic researcher, Kathryn Montgomery, sees today's children as 'Generation Digital' (Montgomery, 2007) operating in a 'new digital marketing ecosystem' (Montgomery and Chester, 2007). Marketers see the current 16-24 age group as the first generation of 'digital natives' 'because they've grown up with the Internet and do not view it as a new medium at all' (Whitehead, 2008:5). Three aspects of this new ecosystem are playing an important role in the new marketing strategies being developed for children:

- the increased range and versatility of the interactions and exchanges between producers and consumers;
- the rapid expansion of peer-to-peer (P2P) networks. These include file sharing networks such a YouTube, social networking sites such as FaceBook and Bebo, and synthetic environments or virtual worlds such as Second Life and Habbo;
- 'Unlike television, there are no restrictions on the levels of children's exposure to marketing messages on the Internet. Children are free to visit commercially sponsored web sites [and] spend unlimited time there' (Moore and Rideout, 2007:210).

It is important not to fall into the trap of seeing change as entirely driven by technology. The Internet certainly opens up new possibilities for marketing (as will be discussed in Chapter 4) but a number of current strategies (such as the mobilisation of word-of-mouth recommendation) adapt techniques that pre-date the Web and continue in non-digital forms. To take advantage of this, marketers are increasingly aiming to combine diverse promotional sites (or 'platforms'), both on and

off line, into integrated campaigns. As Jimmy Maymann, Chief Executive of the GoViral agency, an advocate of 360 degree, all round, marketing, argues;

> *'It doesn't matter if something goes in a website, or a social networking site or if it goes on TV. We just need to engage people.'*
>
> (Edwards, 2008:4)

This approach also blurs the traditional marketing distinction between 'above the line' promotion aimed at cultivating brand awareness and considering a purchase (though advertising) and 'below the line' activity designed to cement a sale (through coupons or in-store displays for example) or to reward customer loyalty (by awarding points that can be converted to goods). 'Online marketing increasingly aims for awareness, consideration, preference and loyalty all at once' (The Economist 2008:73).

The Internet is caught up in a more general process of media commercialisation which has seen it increasingly dominated by sites funded primarily by advertising revenues (Murdock, 2007). Almost all children's sites allow advertising and it is estimated to be the main revenue source for two thirds of them (Moore, 2004). This pattern is repeated across the entire spectrum of cultural services that children engage with. As the evidence presented in Chapter 3 confirms, with the exception of the BBC's Freeview package the rapid expansion of multi-channel television has been dominated by the growth of commercial channels. The growth of 'smart' video recorders allows favourite programming to be automatically recorded, stored, and watched repeatedly it also allows conventional spot advertising to be skipped, (Ofcom, 2008a:67) which is one of the forces driving the increasing marketing interest in integrated advertising.

There is also greater integration of media and we are currently seeing the increasing hybridisation of entertainment, marketing and advertising (again see Chapters 3 and 4). There is also a breaking down of barriers or a 'blurring' of boundaries, a trend that one American commentator has characterised as 'murketing' (Walker, 2008:xvii). Product promotion is being incorporated into the flow of everyday interaction among children through the co-option of talk and communication among friends and peers (see Chapter 4). Finally, developments aim to create greater engagement of children in these processes. To stand out amidst the increasing commercial clutter and sidestep the perceived distrust of young consumers, marketers are placing increasing emphasis on building loyalty to brands by offering experiences that are exciting and fun and encouraging consumers to become co-producers (see Chapter 4). As one marketer recently noted 'it is time to stop marketing to them and instead market with them' (Needham, 2008:61).

These developments in the media most used by children combined with the increasing commercialisation of public spaces which were previously advertising-free zones, are intensifying and generalising advertising and marketing to children. These shifts have led some marketers to characterise today's three to eleven year olds as 'kidsumers', arguing that they are 'growing up in an adult world of consumerism' to an extent that sets 'them apart from previous generations' (Wiener, 2004). The chapters that follow expand on these points showing, through a range of examples and evidence, how these changes are increasing the ways in which children encounter the commercial world.

1.4 Summary

The meanings and definitions of childhood have changed over time with the successive emergence of new 'stages' and market niches such as 'toddlers', 'teenagers', and 'tweens'.

Historically, the expansion of marketing to children in their role as consumers has been accompanied by the development of public cultural resources oriented to inducting young people into their roles as citizens with responsibilities for the overall quality of communal life.

In recent years the increased privatisation of public space coupled with the expansion of commercial channels on multi-channel television systems and advertising on the Internet has expanded the volume and forms of commercial messages children encounter.

The established boundaries drawn between advertising and content are becoming increasingly blurred and it now becomes difficult to separate out what is advertising and marketing and what is entertainment.

2 THE PRIVATISATION OF PUBLIC SPACE

2.1 Introduction

In this chapter we turn our attention to the ways that children are encountering the commercial world in those spaces and places defined as public. While the evidence of how extensive this development is remains problematic there is a growing recognition in the literature that changes are taking place that bring commercialism and commercial activity into spaces traditionally thought of as commercial free. The first part of the chapter examines developments in schooling and education. This is followed by a discussion of the growing involvement of commercial activity in children's play environments and spaces and an examination of how new developments are reshaping retail environments and dedicated leisure spaces.

2.1.1 The Commercialisation of Schooling and Education

Schooling and education, in general, is an area where children seem to be increasingly encountering the commercial world (Kenway and Bullen, 2001; Molnar et al., 2008). However, there remains limited research evidence on the extent of the commercialisation of education, or the impact it may have on the lives and perceptions of children. Understanding what role commercialisation plays in the education system is not straightforward, although a useful starting point is the distinction between 'endogeneous' and 'exogeneous' approaches to privatisation (Ball, 2007).

While there is substantial overlap between them, **endogeneous strategies** involve **importing private sector techniques** and ideas, in order to create more 'business-like' environments within the public sector. It is strongly associated with policy driven initiatives and approaches that shape not only how schools operate in the locality but how education is managed by Local Authorities and how funding is raised and distributed (Ball and Youdell, 2008). Issues like the creation of quasi-markets and competition between schools, changes in how schools are managed or funded and the introduction of 'choice' are all driven by wider policy initiatives. An example of this would be the Privet Finance Initiative which is at the heart of the government school building programme. This initiative aims to draw private finance into the re-structuring or building of schools. Recent evidence suggests it is attracting funding from a wide range of global sources such as companies in Sweden (Skanska) and Japan (Kajima) (Ball and Youdell, 2008).

Ball also suggests that **exogenous** privatisation has expanded in the UK (Ball and Youdell, 2008). This involves the expansion of **commercial messages** in the educational environment. Examples include the growth of direct marketing and advertising in schools and the use of sponsorship programmes This theme will be explored further below.

Both these developments are 'commercial' and while sometimes less visible, they contextualise education as an environment where businesses, marketers, and advertisers are welcome and can play a role in improving the educational environment. This is, then, a trend where opportunities for the private sector to make profits within the public sector has increased (Molnar et al., 2008). How far

these changes have impacted on how schools engage with commercial messages remains unknown and how positive or negative this activity is remains unclear. No research exists that shows the extent of this activity or its impact. Yet, as Ball (2007) suggests, in the UK these developments are substantially rebalancing the relationships between 'markets and the state' in an effort to compete in a globalised 'knowledge economy'.

In terms of the **exogenous** privatisation experience that schools and children, in particular, have of commercialism, Molnar et al., (2008) provides a useful typology of the different forms of commercial activity that schools engage in. It is difficult to determine the extent to which these different types of activities are applicable to the UK context, but there is certainly evidence of all the types of commercialism listed below occurring in other Western countries. The two main areas that seem to have greatest influence in the UK are as follows.

2.1.2   Sponsorship of school events and activities and incentive schemes

Sponsorship involves corporations paying for or subsidizing school events or activities in return for the right to have their name associated with them. This offers opportunities for corporations to show that they are socially responsible and to often encourage children to take part in positive activities, whist also helping build brand loyalty amongst parents and children. For example, Walkers Crisps run a programme called *Walkers Football Fund* that offers branded kits to schools and sports clubs to encourage children to do more sport. Kellogg's have their *Breakfast Clubs Plus* initiative which encourages children to eat breakfast before school (their products) and Coca Cola sponsor school sport events (see Schools 7s in Scotland http://www.coca-cola7s.co.uk/ and their minute maid cup). (www.presscentre.cocacola.co.uk/viewnews/mm_schools_cup_semi_finalists_2007)

The distinction between sponsorship and incentive schemes is not always clear. Both involve corporations promoting themselves as socially responsible and encouraging children to engage in positive activities, whilst simultaneously increasing brand loyalty. Under incentive programmes, corporate organisations provide money, goods, or services when children or parents engage in a particular activity. This approach has a long history going back to Campbell's 'Labels for Education' programme where free educational equipment was provided in return for the purchase of Campbell products. More recent programmes include Cadbury's *'Get Active'* campaign offering children opportunities to get sports equipment by collecting tokens from chocolate bars; Tesco's *'Computers for schools'* scheme; Sainsbury's *'Active Kids'* programme; and more recently Morrison's *'Let's Grow'* initiative, which is aimed at helping children to understand where food comes from. Tesco's also undertake a wide range of other similar programmes such as *Tesco's Sports for Schools, 'Tesco Young Chef'* and *Carbon Control: Tune into Change* programme aimed at encouraging responsibility towards the climate. Tesco's and Walker's Crisps both run schemes offering money off vouchers for Merlin Entertainment Group attractions (including Alton Towers and Legoland Windsor). These money off programmes allow children and their parents to visit such attractions at a lower price than normal, something which they may not normally get the chance to do. These incentive schemes play a part in promoting responsible citizenship, through encouraging children to help their schools, to become more aware of the world around them and also to engage in healthy activities. However,

some concerns have been raised about how many of these sponsorship and incentive programmes promote a healthy lifestyle while selling products that contribute to the problems of obesity (Molnar et al., 2008). Cadbury's campaign, for example, required children to consume over 1.25 million calories in order to purchase just one item on offer. Evidence from a number of studies also shows that to collect enough tokens children and parents have to spend enormous amounts of money and time (Molnar et al., 2008). The amount of money children and parents have to spend to get 'rewarded' in programmes set up by organisations such as Tesco's is high. For example, to secure a scanner worth £80, vouchers to a value of £220,000 are needed. More recent developments have started to see corporations providing free goods as a way of rewarding positive behaviour. For example, a US programme aimed at rewarding academic performance, associated with Samsung and other brands, who gave free points on pupil's mobile phones which then converts to 'talk time' (Molnar et al., 2008).

2.1.3 Sponsored teaching materials, lesson plans and publishing material aimed at supporting parents and children with their learning

There has been a growth of materials supplied and developed by corporations and trade associations that aim to help with instruction and the implementation of the curriculum. Much of this material is targeted directly at schools. In the UK all the major energy companies produce sponsored educational material while British Nuclear Fuels has its own website that aims to support teachers develop their teaching materials. These materials can be helpful to teachers, but it is important that pupils are aware of the links the teaching materials have to major companies. To this end, the Advertising Association also provides resources to help children to understand advertising, and to be critical of it. (http://www.mediasmart.org.uk/)

A wide range of agencies are also emerging to act as 'brokers' for industries creating new resources to help teachers in their lesson planning, which are directly influenced by brands. For example, MBA and the Rapport Group provide ways that companies can market their products through and for the educational sector. *Nestlé, Procter & Gamble* and *Corus* have all had material produced this way to help schools deliver the science curriculum. Such materials can help pupils to understand the real-life applications of the science curriculum. More recently we have seen large corporations such as McDonalds, FlyBe and Network Rail offer to become more involved in the new diplomas.

The *National Schools Partnership* (http://www.schoolpartnershipmarketing.co.uk) actively campaigns for greater co-operation between the private sector and schools. They provide a range of services for companies to help create working partnerships with schools that will enhance the sales of their products as well as benefiting schools. This includes brokering sponsorship arrangements, helping to market existing or new brands and also undertaking market research for companies. Examples include *'Tales from the Glove box'* which was a promotion of different reading material for primary aged children. This aimed to increase children's active engagement in reading while also increasing children's and parents' awareness of the Renault Scenic car and the Renault brand in general. According to their website, over 37 per cent of users became more aware of the Renault Scenic and 52 per cent believed that the Renault stood out above other cars. (http://www.schoolpartnershipmarketing.co.uk/children-advertising-case-

studies/renault.html) Another example, was the marketing of the High School Musical CD for Disney. This was linked to promotion of a PE dance that engaged children in active sport while also promoting the sale of the CD. Over 2,500 schools were involved, with over 500,000 pupils taking part. Disney saw its sales increase and the CD became one of the top sellers of 2007. (http://www.schoolpartnershipmarketing.co.uk/children-advertising-case-studies/high-school-musical.html). The practice of engaging schools in these types of activities is extensive and appears to be expanding. It is, therefore, important that independent research is undertaken to the extent of this practice, and also into the benefits and possible downsides of such activities.

The marketing of resources directly to children and parents is also becoming more prevalent. As Buckingham (2008) highlights, the markets in Home Tutoring, magazines, CD-ROMs, websites, revision guides and educational books have all expanded over the previous ten years. As parents have become more concerned about their children managing the 'exam culture' of schools a wide range of businesses have moved into the market place and developed support material.

There are other methods used by marketers and advertises but these seem to be more common in the US. These are:

2.1.4 Use of school space for advertising and marketing i.e. logos, banners and advertising hoardings
This involves corporations having allocated space within schools in areas such as notice boards, walls, and other sites. Issues of naming rights of capital projects, such as naming schools after sponsors or key individuals, can also be included. In the UK, the organisation TenNine (http://www.tennine.co.uk) operates a scheme with schools where they are provided with posters. Schools agree to locate these in high traffic areas of the school for a fee. This can bring in revenue of approximately a £1,000 a year. Schools can also become involved in other fundraising activities such as leaflet and postcard distribution. Research by TenNine suggests that this scheme is highly popular with schools and pupils, with over 95 per cent saying it enhances the environment of the school (See their submission to the Review). In the UKs no independent research exists and, therefore, little is known about the extent of this practice. However, in the US there is a growing trend for corporate industry to promote their goods in educational environments.

2.1.5 Exclusive agreements with companies for the provision of goods and services
Corporations are interested in establishing exclusive rights to sell and promote their goods and services in schools. In return schools tend to receive a percentage of the resulting profits. This is most relevant in relation to the soft drinks industry and the use of vending machines. While there has been a shift in the types of drinks being sold in schools (as a result of voluntary agreements) evidence in America suggests that a large number of schools have exclusive deals to sell certain products. For example, 75 per cent of high schools have such arrangements. Little is known about how schools engage in this practice in the UK as no independent research exists.

2.1.6 Electronic marketing by providing access to television and computers in exchange for the right to advertise

This involves the provision of equipment, usually for the production of own radio or TV programmes, in return for schools allowing the funder to advertise to pupils. The most well know example is Channel One in the US which has over six million teenagers in 270,000 classrooms as an audience. In the UK up until now, the provision of broadcasting to schools has been dominated by public service channels and has been free of advertising. The BBC has for many years run a Schools Radio in which primary schools can link into curriculum information (http://www.bbc.co.uk/schools). More recently other BBC programmes have been developed on Radio Three (Making Tracks) and Radio 4's Go For it. The BBC also has a long tradition in the provision of schools television and web-based educational materials linked to the curriculum.

Commercial interests are, however, able to reach children and teenagers through the growing number of private radio stations run by or for young people. These tend to be local (and not providing national coverage) and can be run either within individual schools or based outside and aimed at a wider community. In many cases they are developed as a creative activity for the young people themselves. For a range of examples see http://www.childrenandradio.org.uk. One good example is *'Take Over Radio'* which is based in Leicester and has broadcasts to over 280,000 children and adults (http://www.takeoverradio.co.uk/. It is not school-based but targets children and young people aged from under five to 35 years old although its main audience is 13 to 19 year olds. It allows children and young people to experience broadcasting first hand, and in some cases to present their own shows. It operates on a commercial basis and companies such as Asda, Golden Wonder Crisps and Dominoes Toys all advertise on this medium, although these companies will be subject to normal advertising regulations (See chapter five). There is little evidence of how many children are involved in these activities nationwide.

2.1.7 Fundraising–commercial programmes of packages to assist schools in their fundraising activities

This involves commercial organisations in helping schools raise funds. This can range from local businesses providing prizes for a competition to international corporations such as McDonald's sponsoring fundraising events in the locality. Some of these practices may be quite common in the UK but there is no recent independent research evidence showing how many schools may be engaging with commercial organisations around fundraising or how extensive it may be.

While the evidence base remains thin what is available tends to point to the expanding involvement of the commercial sector in education and the opening up of new ways for the Advertising and Marketing Industries to access children. Schools are becoming commercialised from both the top down (PFI) and the bottom up (incentive schemes). (But it is important to acknowledge when operating budgets are under pressure these developments may provide a welcome relief for education authorities, especially if companies are willing to provide free resources which help with teaching). As discussed above, our knowledge about the extent of commercialism in schools and further education remains limited, especially in the UK context. Policy is also unclear about how far schools should limit this type of activity. There is encouragement for the private sector to take a more active role in education

through initiatives such as Enterprise in Schools (www.enterpriseinschools.org.uk) yet there is no clear definition of the outer boundaries to the extent and types of commercial involvement. Government provides best practice guidelines to schools (see Department for Children, Schools and Families Working With Schools Best Practice Principles, 2008) but at present there is no clear evidence of whether these guidelines are being followed.

2.2   The Commercialisation of Children's Play

A recent survey for Play England asked children aged 7-12 where they experienced adventurous and challenging play. Almost half (48 per cent) said at home and almost as many, 44 per cent, mentioned theme parks. Only 24 per cent mentioned their local streets and 29 per cent outdoor natural spaces. When their parents were asked the same question, 70 per cent mentioned outdoor spaces and 45 per cent their local streets but only 27 per cent chose home and 16 per cent theme parks (Playday, 2008). These figures point to a shift in children's activities outside school. Not only is the private space of the home becoming a more important location for leisure and play, but when children do go out it is more likely to be to public spaces such as theme parks or shopping malls, in which advertising and marketing play a prominent role, rather than unstructured spaces in the immediate neighbourhood. There are multiple reasons for this shift, ranging from increased car ownership and fear for children's safety outside the home to the convenience of commercial leisure destinations, but the outcome is to increase children's exposure to promotional material

It is well recognised today that play is an important experience for the development of children's creativity, social skills and overall well being (DCSF, 2008; Sutton, 2008) but as the Play England findings suggest 'unsupervised play' outdoors has been reduced while the home has become more important as a centre of activity. And within the home, the nature of play has changed. Relatively inexpensive play involving basic toys, board games, dressing up and fantasy has been increasingly displaced by multi-channel television, computers and games consoles such as Playstation, X Box and Wii (See chapter 3). At one level these innovations extend children's range of experience. The new WiiFit for example allows children to engage in a wide range of different activities via their computer screen, including things that perhaps they would not get to do in real life, such as skiing and snowboarding. Other computer games have a similarly active element which is likely to appeal to children especially if they are unable or unwilling to spend time being active outside. New games such as Guitar Hero, Singstar and Dance Mat allow children to interact with the game and, again, engage in activities which they perhaps would not get to do in real life, such as playing the guitar. Added to which all these games have multi-player modes, so they can be played with other children or with parents. WiiFit, for example, has been marketed as a fun activity to keep children fit, in which parents can also join. Equally, Guitar Hero is attractive as an activity that parents can share with their children. On the other hand, as the evidence reviewed in Chapter 4 shows very clearly, these new media spaces also increase the volume of marketing and advertising which reaches children, as well as immersing them in branded spaces.

The growing commercialisation of leisure space is also evident outside the home. One contemporary development, that is especially relevant to younger children, has been the expansion of commercialised play spaces such as Play Centres that provide *'Ball Parks', 'soft play areas', climbing frames and 'safe surfaces'* (McKendrick et al., 2000). While there is limited research on their extent and growth it is an important area of development. The growth of commercialised play space has been stimulated by an awareness in the private sector of the successes of the voluntary programmes in generating rich and sensory play spaces. Economic re-structuring in built-up areas and changes in the licensing trade have also created new opportunities. Corporate providers such as *Alphabet Zoo, Charlie Chalks, and Wacky Warehouses* have been quick to recognise the emerging opportunities to engage children in more challenging forms of play, but in a safe environment. This commodification of the everyday experience of play for a profit is an important 'new' space where commercial enterprise can access children and either sell them products or advertise and market to them (McKendrick et al., 2000).

Research suggests that a key element in fostering participation in many of the new forms of commercialised play centres is their attractiveness to parents (McKendrick, 2000). Soft-play areas linked to public houses, or coffee-mornings where parents can meet each other while their children play in the soft play area, provide value for parents as well as children. Marketing strategies designed to mobilise parents and children around a consensus can also be seen in the film industry where children's cartoon films are designed to appeal to adults as well as children. Parents are more willing to take their children to see the films *Ratatouille* or *Shrek* because there are 'knowing nods' to the adults. Although it is recognised as an important area for policy development (DCSF, 2008), given how little is known about these processes it may be appropriate for further research to be undertaken in this area.

2.3   Branded Locations and Events

As the Play England study demonstrates, Theme Parks, the successors to amusement parks, are now a major leisure destination for families with children. Since 1955 when Disneyland opened its first theme park, with entertainment and fairground rides built entirely around the company's products, corporations are increasingly creating dedicated branded spaces that combine pleasure with promotion. Disneyland Florida now has over 17 million visitors a year (Themed Entertainment Association, 2007). It has since expanded internationally to included Disneyland Paris (12 million visitors in 2007), Disneyland Tokyo (13.9 million visitors in 2007) and Disneyland Hong Kong (4.1 million visitors in 2007). In the UK the largest Theme Parks are Blackpool Pleasure Beach (5.5 million visitors in 2007), Alton Towers (2.4 million visitors in 2007) and Thorpe Park (1.7 million visitors in 2007).[1] Two of the best known branded theme parks in Britain are Legoland (Windsor) and Cadbury World (Birmingham). Other brands have secured spaces within larger theme park complexes by sponsoring popular rides and locations.

The combination of entertainment and retailing is also characteristic of major shopping malls. As the website for the largest complex in the south east of England notes, 'Bluewater is so much more than just a shopping destination'

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[1]   All figures are from Themed Entertainment Association, 2007.

(www.Bluewater.co.uk, 2008). It also contains a multiplex cinema, numerous restaurants and eating places together with play areas specifically designed for children, including a climbing wall. The integration of shopping and play is often repeated in stores stocking children's products. The Lego brand stores for example, are expressly designed to 'provide a stimulating platform for experiencing the brand and its core values [and to provide] a starting point for play, dovetailing with the brand's strapline "PlayOn" '(Wiener, 2004:50). This same logic also stretches across other public spaces as with Electronic Arts' provision of video games for bored children waiting with parents in airport lounges (Stokes, 2008).

The restoration of free entry has secured six of the major museums in London places in the UK's top ten visitor attractions in 2007, meaning that children now have greater access to such cultural sites (Association of Leading Visitor Attractions, 2008). Major exhibitions and attractions at these locations may require sponsorship from companies and brands, meaning that these sites are not insulated from commercial promotion.

Events aimed at children have also become increasingly branded as marketers seek to 'make people remark' and recommend by giving them 'a remarkable experience' (Richey, 2008:5). The Beck's Beer Fusions events are a case in point. In addition to staging a series of live rock concerts the campaign offers limited edition bottles bearing work by well known contemporary artists, and a competition to submit and select the artworks that will appear at the concerts. Although users logging onto the site are required to declare that they are of legal drinking age, there is no check on the truthfulness of replies. This multidimensional strategy, designed to foster 'ownership' of the brand, extends to the brands' entry on Wikipedia, the online encyclopaedia, which invites users 'to be part of who we are' by writing additional material adding 'milestones, accolades or any other fodder we don't even know about' (www.Becks.co.uk, 2008). The rise of branded public locations and events is part of the wider trend towards marketing based on integration and engagement which we will examine in Chapter 4, but to provide context we first need to chart the major trends in children's media consumption.

2.4   Summary

Children are encountering more both endogenous (top down) and exogenous (bottom up) forms of commercialism. These include the commercial sector helping them with fundraising, sponsoring local events and providing teaching materials. There is also evidence of the commercial sector placing advertising within the school or providing goods and services directly. How far this practice takes place in the UK remains unknown. There are gaps in the available evidence on the extent of schools' involvement across the full range of these areas although there are indications that such practices are now becoming more widespread.

There has also been a change in the types of play children engage in, with the widening range of play open to children also opening up more spaces for advertisers and marketers. The shift from play in the streets to play in the home that involves new media is a major development that provides a range of new opportunities for commercial promotion. There has also been a rise in the range of branded locations

and events, which opens up another avenue for marketing and advertising to communicate their messages to children.

3 MEDIA EXPOSURE AND EXPENDITURE

3.1 Introduction

Moving from public to domestic space, this chapter outlines the major trends in children's media usage over the last eight years. The major sources we use to summarise these trends are Ofcom's 2008 Communications Market report and the annual monitoring exercises conducted by the market research agency Childwise from 2000-01 and 2007-08. We have also drawn on data from the British Household Panel Survey Youth Panel (BHPS) for 2003 and 2006. Figures mainly relate to children aged between five and 16 year olds although Ofcom does report on the two to 17 year olds. Patterns of media use in these reports highlight gender difference but they do not provide analysis by social class or ethnicity making reliable statements on national trends in differential access and social exclusion difficult.

3.2 Television

Between 2002 and 2007 the number of channels available in the UK doubled from 236 to 470 (Ofcom, 2008a, p127). By 2008 87 per cent of households had access to various multichannel combinations over and above the five established terrestrial channels (BBC1 and BBC2, ITV1, Channel 4 and Channel 5) (Ofcom, 2008a, p210).

As Figure 3.1 shows, the growth of multi-channel television has seen a proliferation of channels aimed at younger age groups, with 21 channels now listed as 'children's channels' (Childwise, 2008, 4:11). Among those 5-16 year olds asked what channels they watched in the week before being interviewed, several of the new channels launched by the BBC, ITV and Channel 4 were frequently mentioned. CBBC, CBeebies and CITV are particularly popular amongst 5-10 year olds, (Childwise, 2008, 4.11) whilst channels such as E4 and ITV2 are more popular amongst teenagers (Childwise, 2008, 4.19).

As Figure 3.1 also shows, with the exception of the BBC's two channels (Cbeebies and CBBC) the new child and youth oriented services offered by multi-channel systems are commercial channels. Figures from the British Household Panel Survey's Youth Panel for 2003 and 2006 indicate that the number of 11 to 15 year olds watching four or more hours of television on a school night has fallen from 23 per cent in 2003 to 19 per cent in 2006/2007 (author's analysis). Childwise trend data from 2000 to 2007 also reveal a decline in television viewing among five to 16 year olds, although this was somewhat reversed in 2008 (Childwise, 2008, 4.3). Girls are more likely than boys to watch more than four hours of TV a day (BHPS, 2006) with the Childwise survey suggesting that in the last year the number of hours of TV watched by girls has risen from 2.2 hours to 2.6 hours (Childwise, 2008, 4.3). Several reasons can be suggested for this, including the stricter parental controls imposed on girls going out or the increasing number of programmes such as Tracey Beaker and Hannah Montana, aimed at younger girls, and teen soaps such as Hollyoaks, which is popular with older girls (Childwise, 2008, 4.25).

Figure 3.1   Multi-Channel TV Channels Watched in the Last Week (5 to 16 year olds)
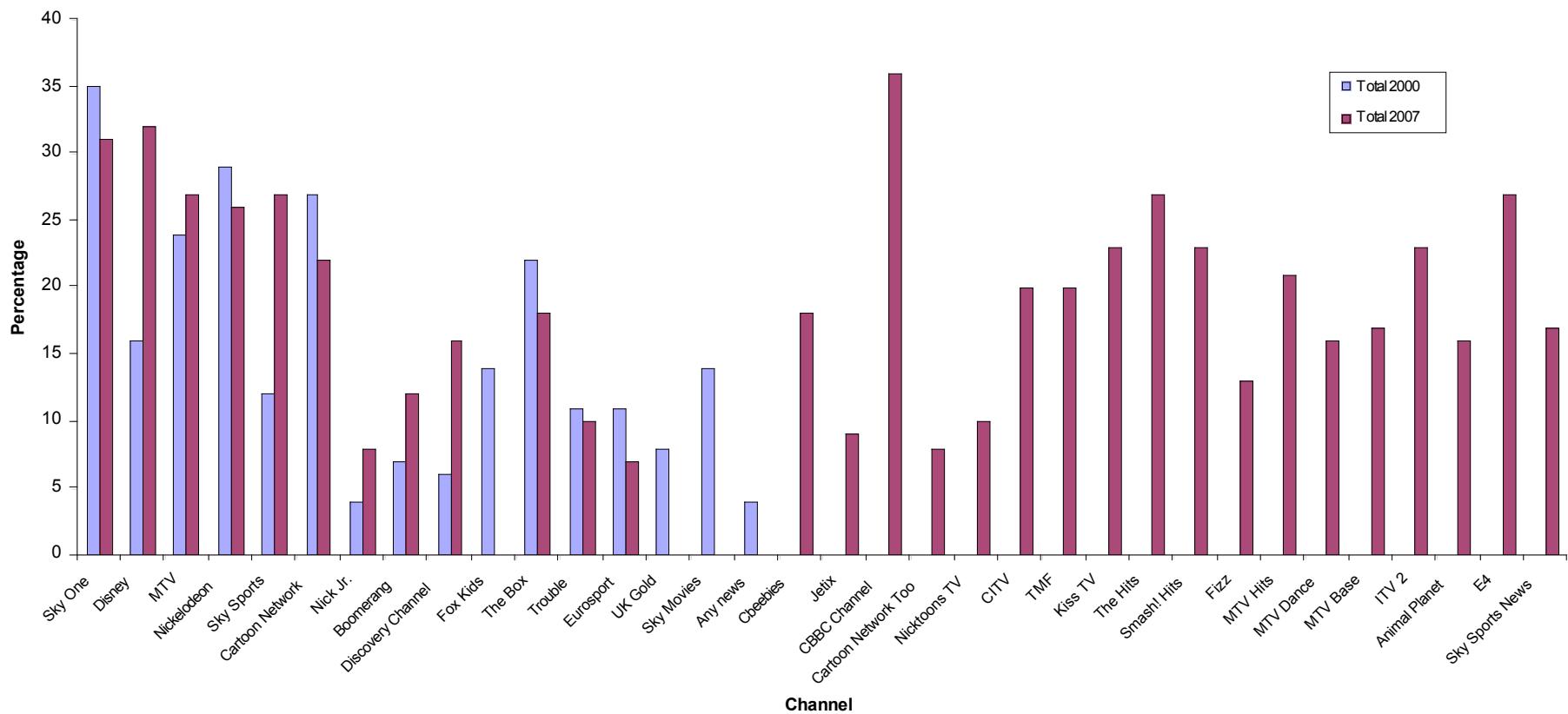

Source: Childwise, 2000, 2.22 ;Childwise, 2008, 4.11.

This trend is part of a wider movement towards greater market segmentation that has seen channels targeted at specific age groups, such as CBeebies for pre-school children, E4 for teenagers, or even the newly launched 'Dave' channel which is aimed at the older, male, teenage market (Ofcom, 2008a, p153). While increased access to multi-channel TV allows children a much wider choice of channels, it also highlights some of the challenges for the advertising regulatory framework. From the data in Figure 3.1 we can see that a number of the channels which are popular with children, such as Sky Sports, MTV and E4, are not children's channels and are, therefore, allowed to carry adverts which may not be appropriate for those under 16.

There are issues around the types of TV programmes which are popular with young people. Figure 3.2 shows the Childwise data on the favourite types of TV programme for girls and boys under 16 in 2007. Whilst the most popular programme types are those aimed at children, such as cartoons, a significant proportion of girls list soaps, teen soaps (such as Hollyoaks) and reality TV programmes as their favourites. Because these programmes are not classified as children's programmes, the advertising regulations designed for children's programming do not apply to them. A recent Which? Report found that programmes such as Coronation Street, Emmerdale, and Beat the Star were all exempt from the restrictions regarding junk food advertising, despite the fact that they had more child viewers than programmes such as Spongebob Squarepants and Scooby Doo, which are deemed to be children's programmes (http://www.which.co.uk/about-which/press/campaign-press-releases/food/2008/09/government-must-switch-on-to-tv-ad-failings.jsp). For boys, sports programmes are extremely popular among all age ranges, but as they are also watched by a high proportion of adults, adverts for products which would not normally be suitable for children, such as those for gambling companies, can be shown around them.

Figure 3.2   Favourite Programme Types (5-16 year olds)
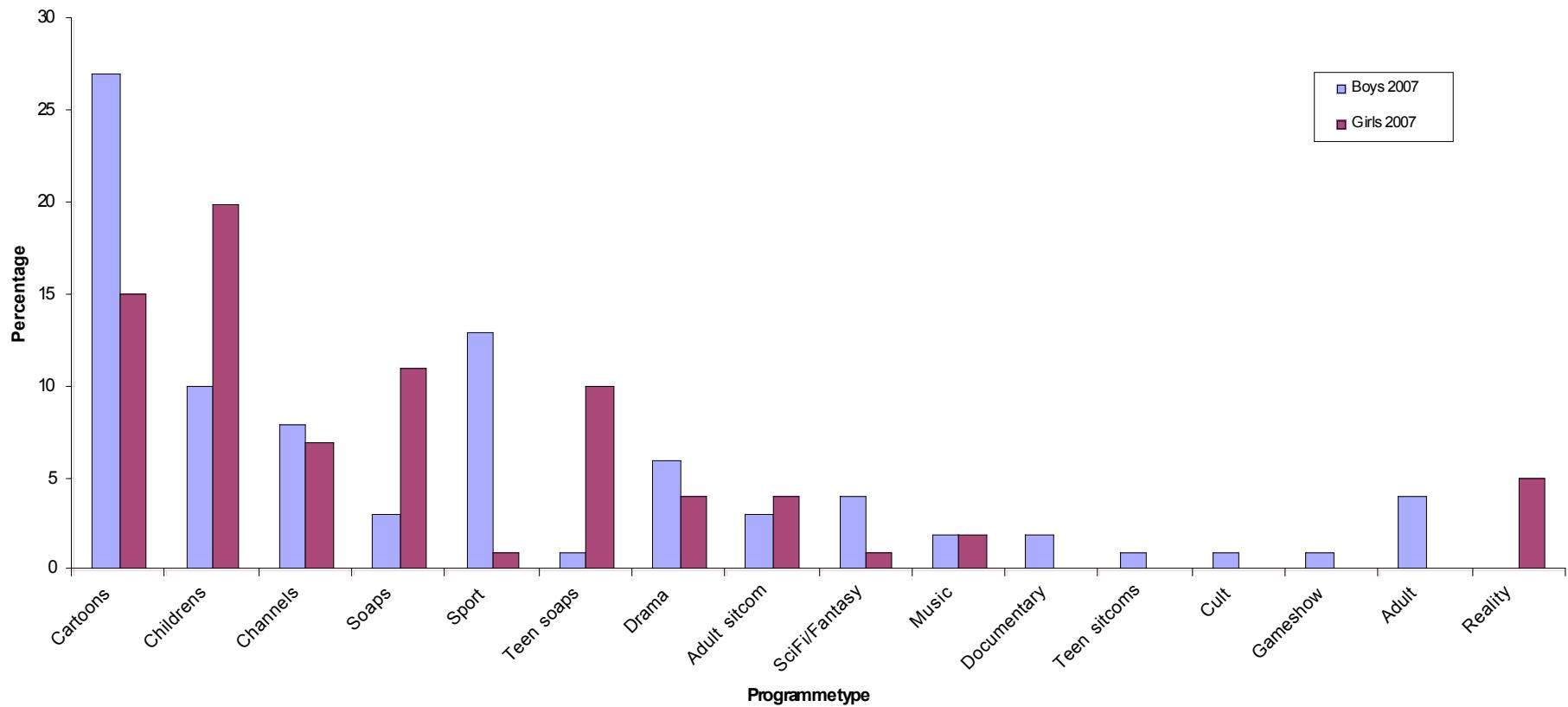
Source: Childwise, 2008, 4.23.

1. Please note, in the above graph, 'children's' refers to children's programmes, whereas 'channels' refer to channels which specifically cater for children.

Figure 3.3   Children with TV in Own Room (2007-2008)
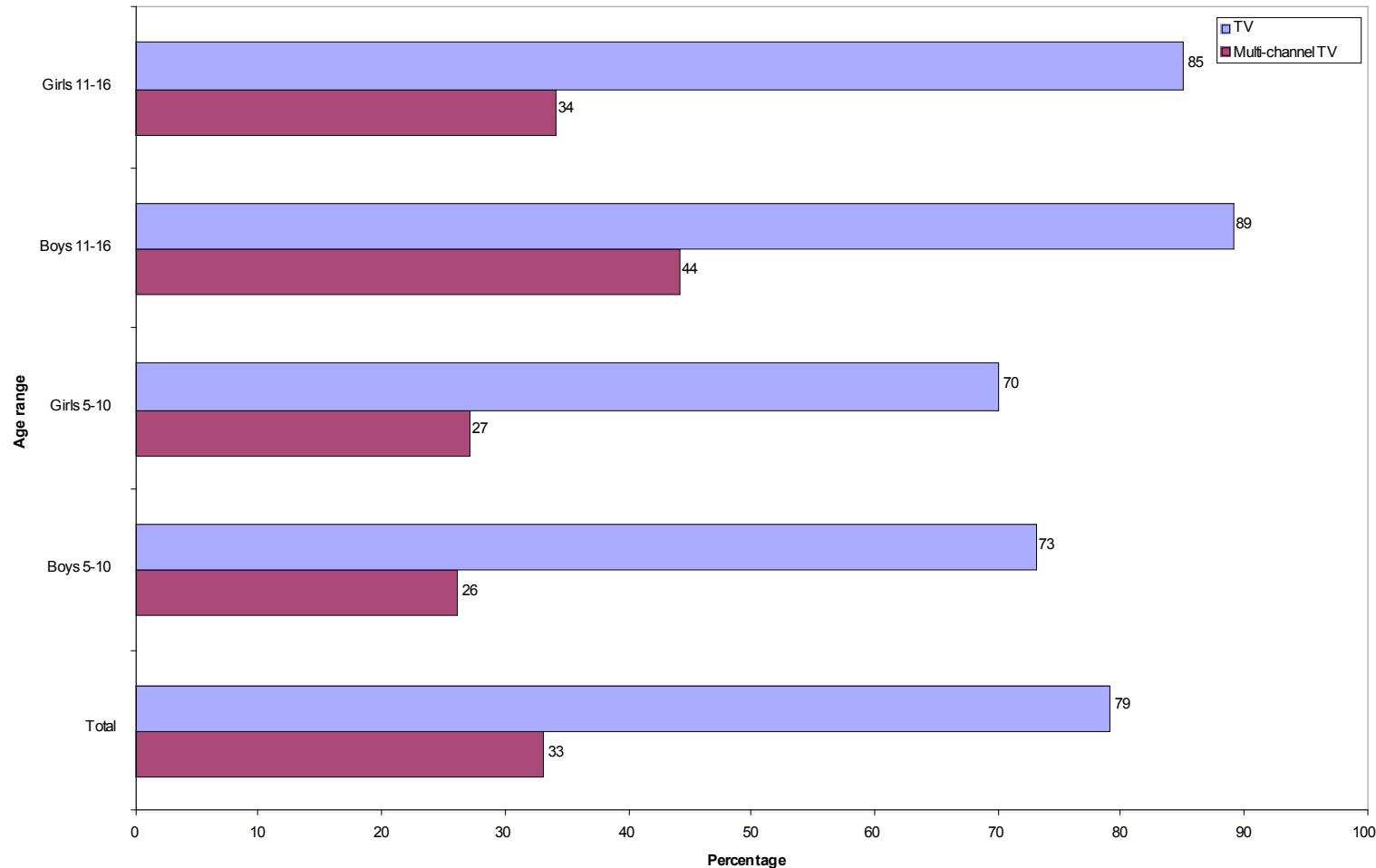
Source: Childwise, 2008, 4.20.

Figure 3.4   TV Viewing in Bed Before Going to Sleep (2007-2008)

Legend:
- Regularly
- Occasionally

Categories (top to bottom): 15-16, 13-14, 11-12, 9-10, 7-8, 5-6, Girls, Boys, Total

X-axis: % (0 to 80)
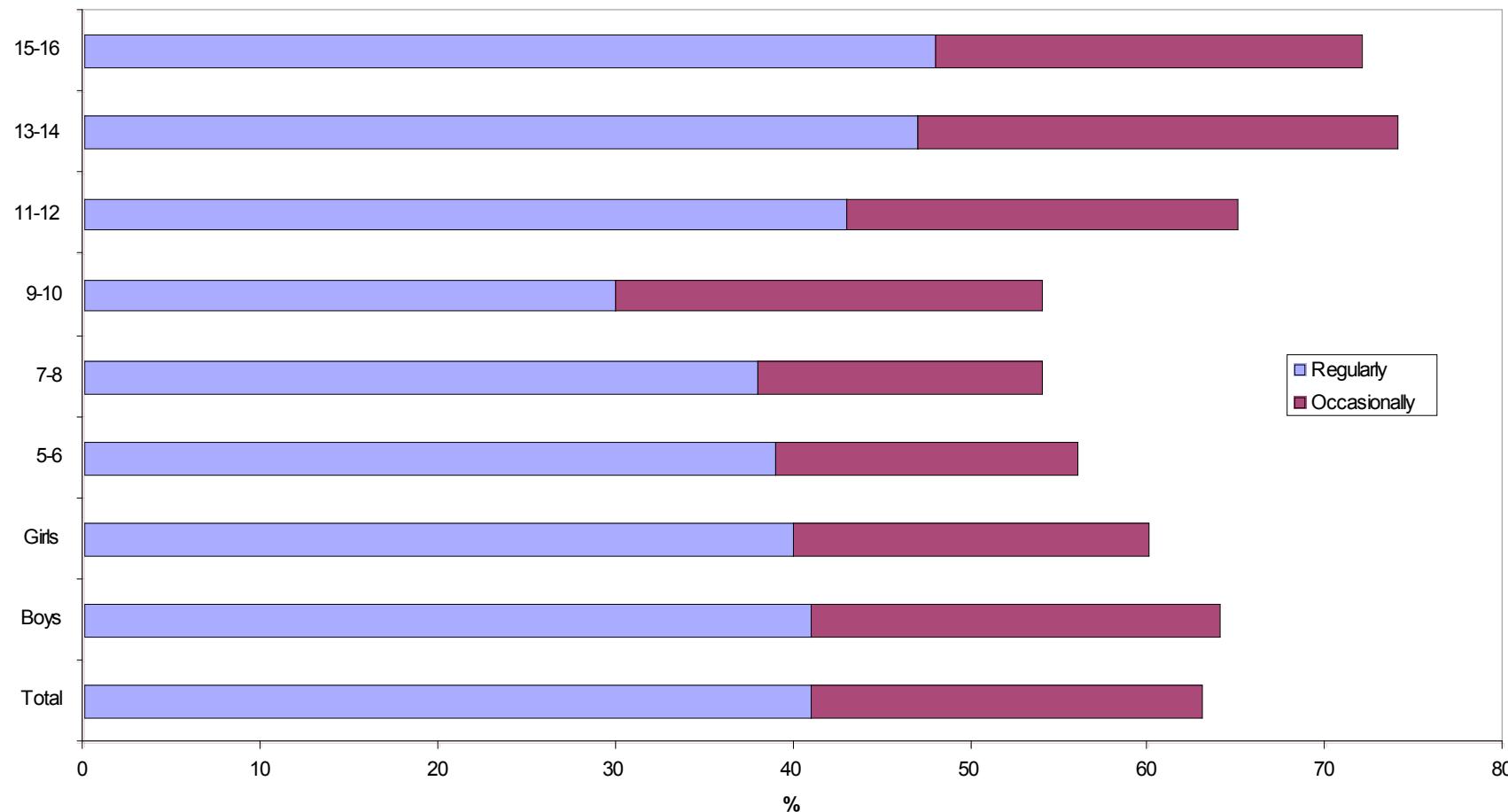
Source: Childwise, 2008, 4.29.

Equally challenging for regulators is the rising number of children with potentially unsupervised access to a TV set. As Figure 3.3 shows, 79 per cent of the under 16s surveyed by Childwise have a TV in their room, and 33 per cent have a multi-channel TV (Childwise, 2008). Although this gives them access to a wider range of programming it also means that they may view programmes or channels which are not suitable for their age group or watch programmes after the watershed, when advertising restrictions are relaxed further. Figure 3.4 shows that a high proportion of children watch TV in bed before going to sleep (Childwise, 2008). It is worth noting that bedtimes will vary for different age groups, and some children's channels have programmes specifically for children's bedtimes, such as the 'Bedtime Hour' on CBeebies. However, as this viewing is likely to be 'private viewing' (Childwise, 2008) it is difficult to know what younger viewers are watching, and whether they are regularly viewing adverts which are not suitable for their age group.

3.3   The Internet

Over the last five years there has been a gradual increase in spending on internet advertising. Figure 3.5 shows the rise in both the amount spent and the share which internet advertising commands of total advertising spend (Ofcom, 2008a). Figure 3.6 shows the distribution and growth of spend across the three main established types of internet advertising, paid-for-search, where advertising is shown alongside search listings; display advertising, in the form of banners or sponsorship; and classified adverts, which are similar to newspaper classifieds (Ofcom, 2008a, p55).

Figure 3.5   Advertising Spend–Internet
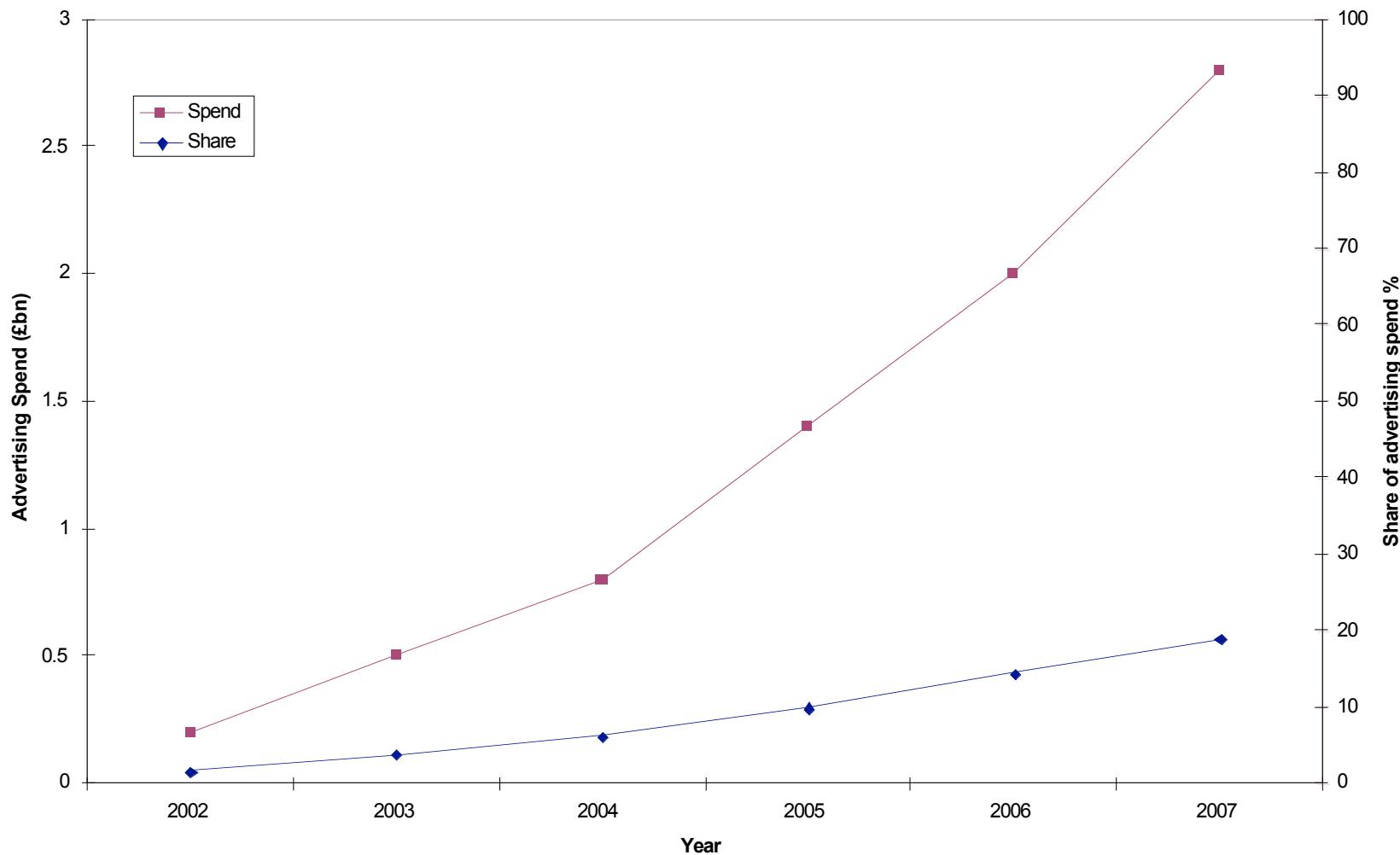
Source: Ofcom, 2008, pp90-97.

Figure 3.6   Internet Advertising Revenue, by Category
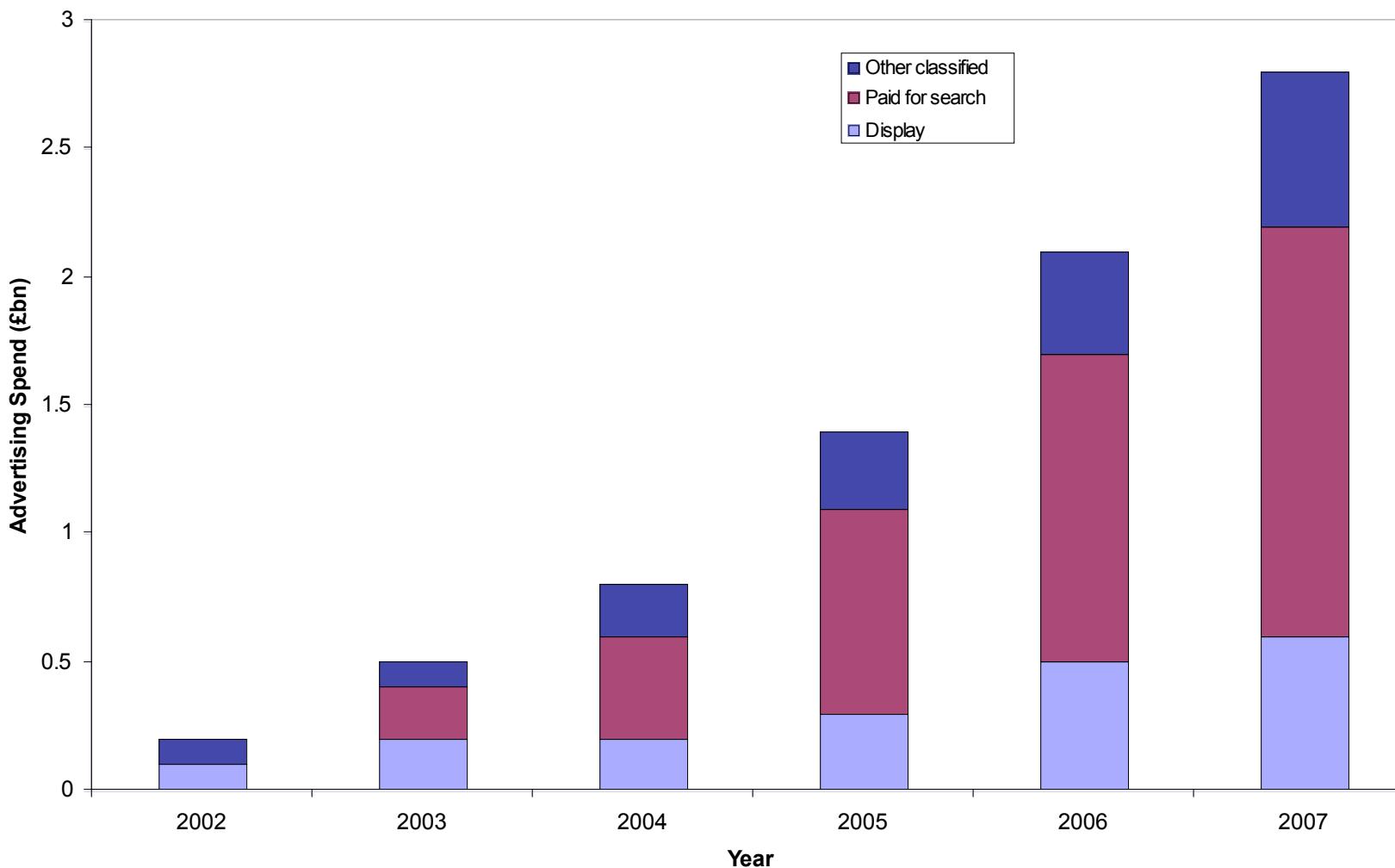
Source: Ofcom, 2008, p97.

We can see that paid-for-search advertising is currently the most popular type of advertising on the Internet. Display advertising is currently the smallest component, although it is likely to become more significant due to internet users' reluctance to pay a subscription to access a website (Ofcom, 2008a, p54). As a consequence users will be faced with advertising on those sites which need revenue to operate, such as Friends Reunited which recently changed from being a subscription service to placing display adverts on the site (Ofcom, 2008a, p98).

The increasing importance of the internet as a medium for advertising and marketing is mainly driven by the ever-increasing online audience which has made the Internet the second most consumed medium after TV (Internet Advertising Bureau, 2007). This is particularly the case for young people, with 41 per cent of 11-15 year olds going online everyday in 2006, as compared to only 18 per cent in 2003 (BHPS, 2006). The Childwise survey suggests that this rising use is also seen in the younger age groups. (See Figure 3.7).

Figure 3.7   Percentage Who Go Online/Have Accessed the Internet (2007-2008)
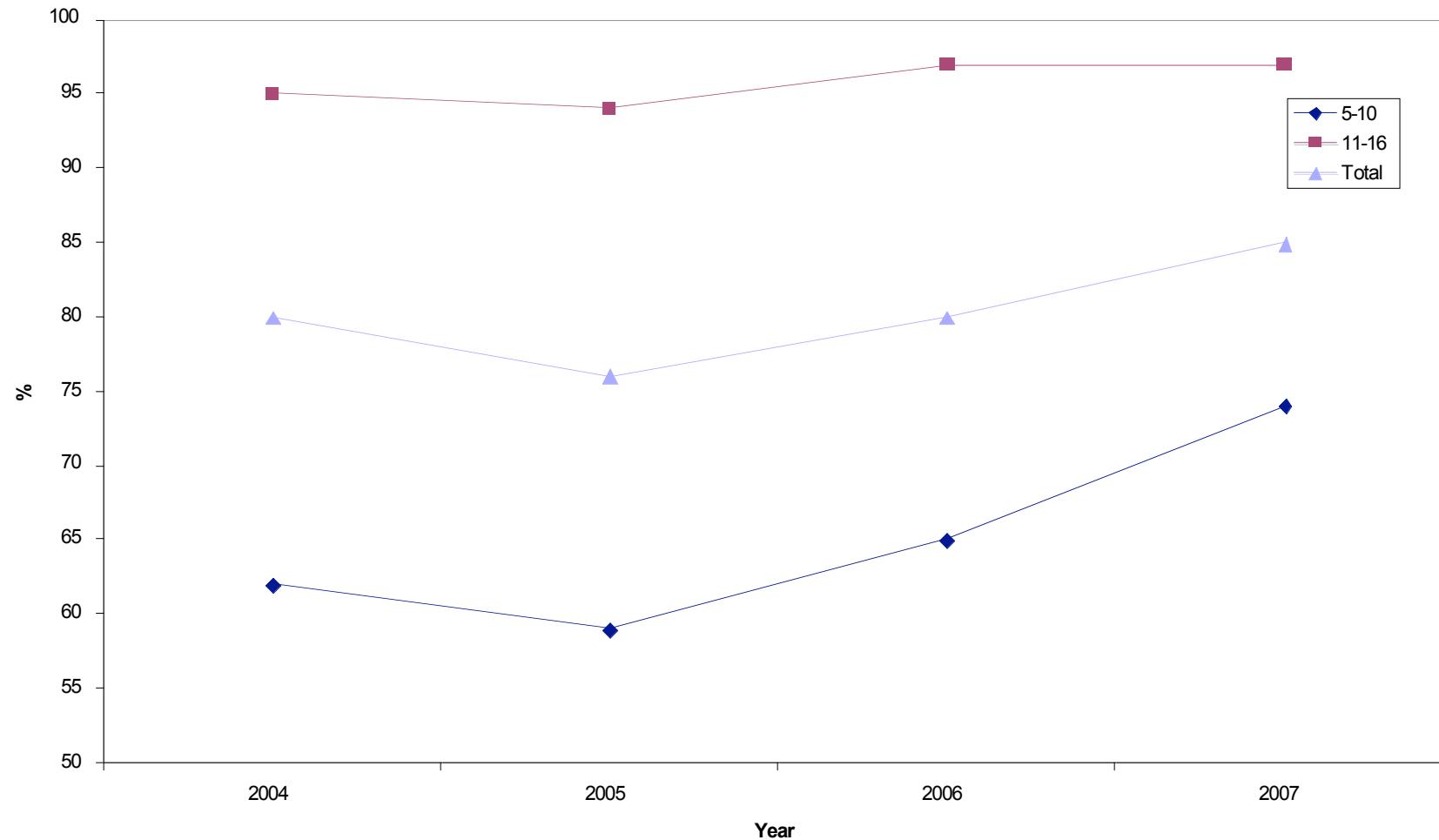
Source: Childwise, 2008, 1.7.

Figure 3.8   Computers at Home and Own Computer (2007-2008)
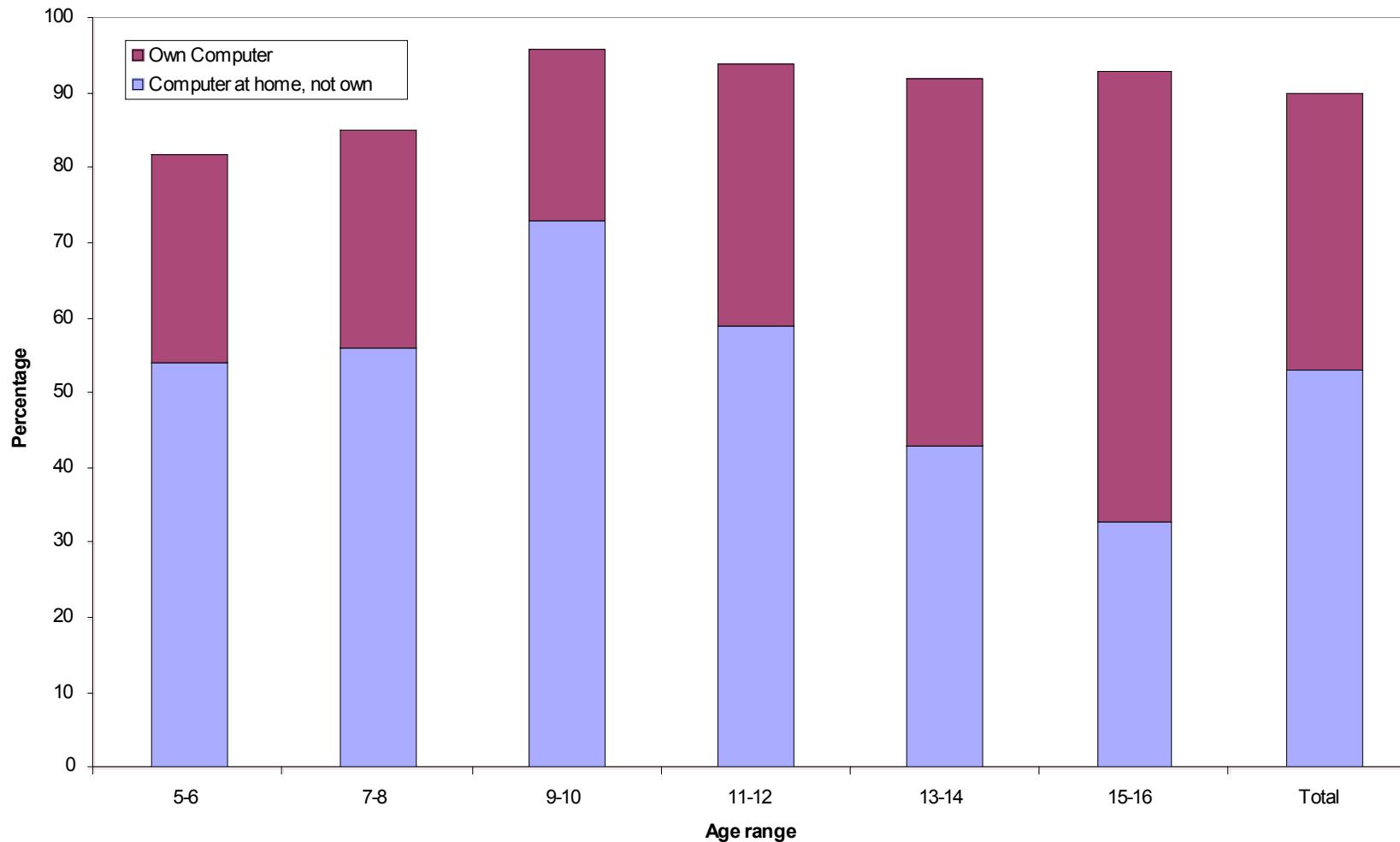
Source: Childwise, 2008, 1.2.

Figure 3.8 shows that 90 per cent of the children aged 5-16 surveyed by Childwise have access to a computer in their own home, with 37 per cent owning their own computer, 23 per cent having an internet connection in their own room, and nine per cent having access to a WiFi laptop (Childwise, 2008, 1.8). The Childwise survey data (shown in Figure 3.9) indicates that almost all young people go online while other recent research suggests that among 11-15 year olds only 17 per cent never use a PC for the internet or e-mail (BHPS, 2006).

Having home access to a computer means that young people are able to explore the Internet and enjoy the new opportunities that Web 2.0 affords. They can explore their hobbies and interests, access the websites of their favourite TV programmes, interact with others online via social networking sites and make use of the educational materials provided by sites such as the BBC GCSE Bitesize, a resource for revision and learning (Ofcom, 2008a, p345). According to the Childwise survey, communication is still the main reason why young people use the Internet, with 33 per cent using it for instant messaging, and 19 per cent using social networking sites (See Figure 3.10). Games are also popular, with Runescape a particular favourite for boys, whereas 'tween' girls name sites such as Habbo and Neopets as among their favourites (Childwise, 2008, 1.19-20).

As with children's multi-channel television preferences, noted earlier, the great majority of the web sites nominated as favourites are commercial and generate revenues through advertising. Commercial sites popular with younger children, such as Club Penguin, Bratz and Cartoon Network, may also include games linked to product promotion (Childwise, 2008, 1.20). The growth of 'advergames' on sites aimed at young people will be examined in Chapter 4 together with current marketing strategies in relation to social networking sites. As Figure 3.11 shows, a high percentage of the young people surveyed for Childwise, have visited a social network site, with over 50 per cent having a profile on one of these sites.

Figure 3.9   Percentage of Children Who Go Online (2007-2008)

Age range	Percentage
Total	85
15-16	97
13-14	97
11-12	96
9-10	91
7-8	77
5-6	50
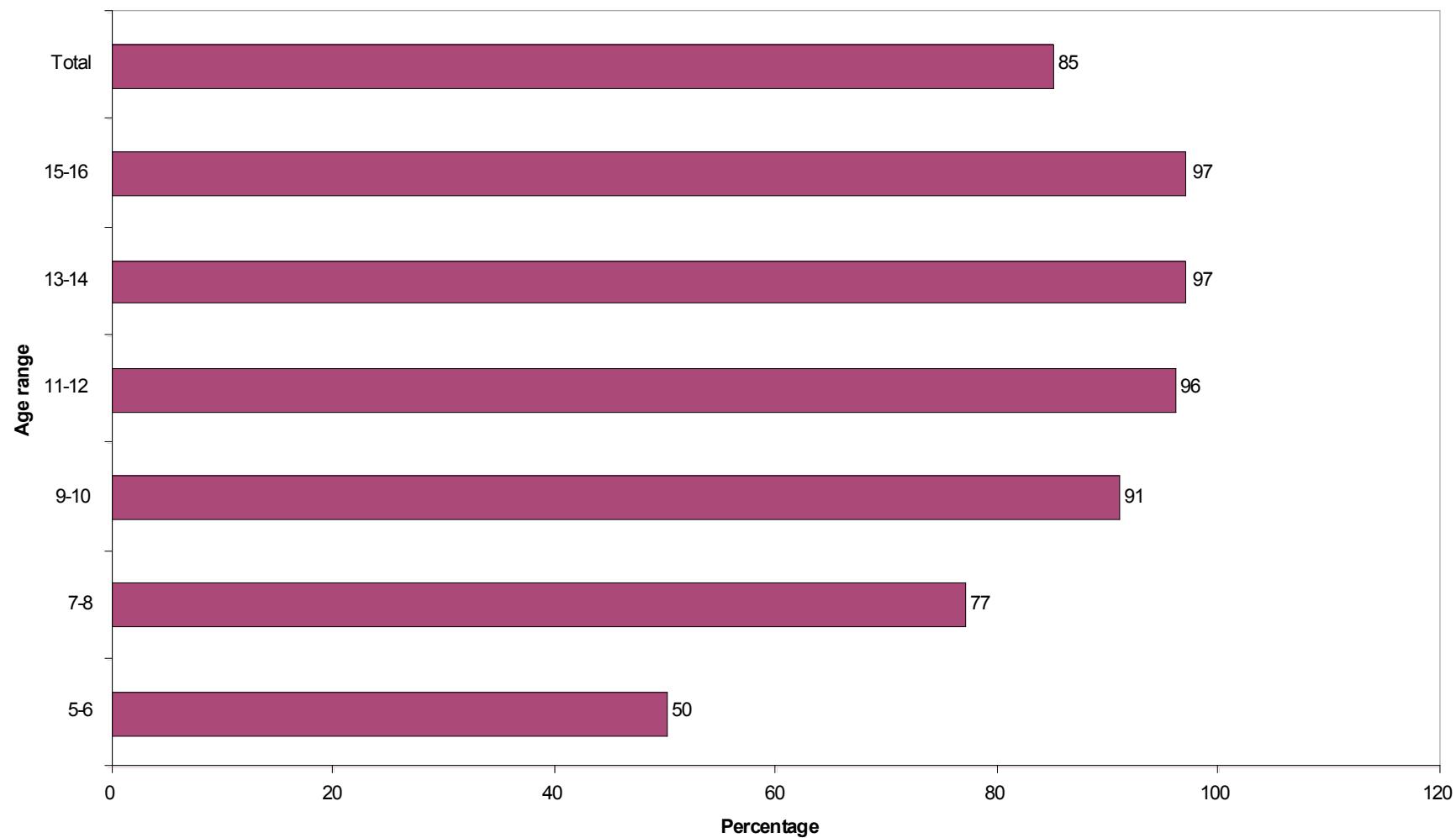
Source: Childwise, 2008, 1.6.

Figure 3.10 Type of Activity When Last Online

Activity	Percentage
Online auctions	2
Buying products/services	2
Checking sports results	3
Receiving e-mails	4
Sending e-mails	4
Search	4
Watching video clips	5
Listening to music	5
Downloading music	5
Look up leisure information	11
Social networking	19
Look up info for schoolwork	20
Play games	29
Instant messaging	33
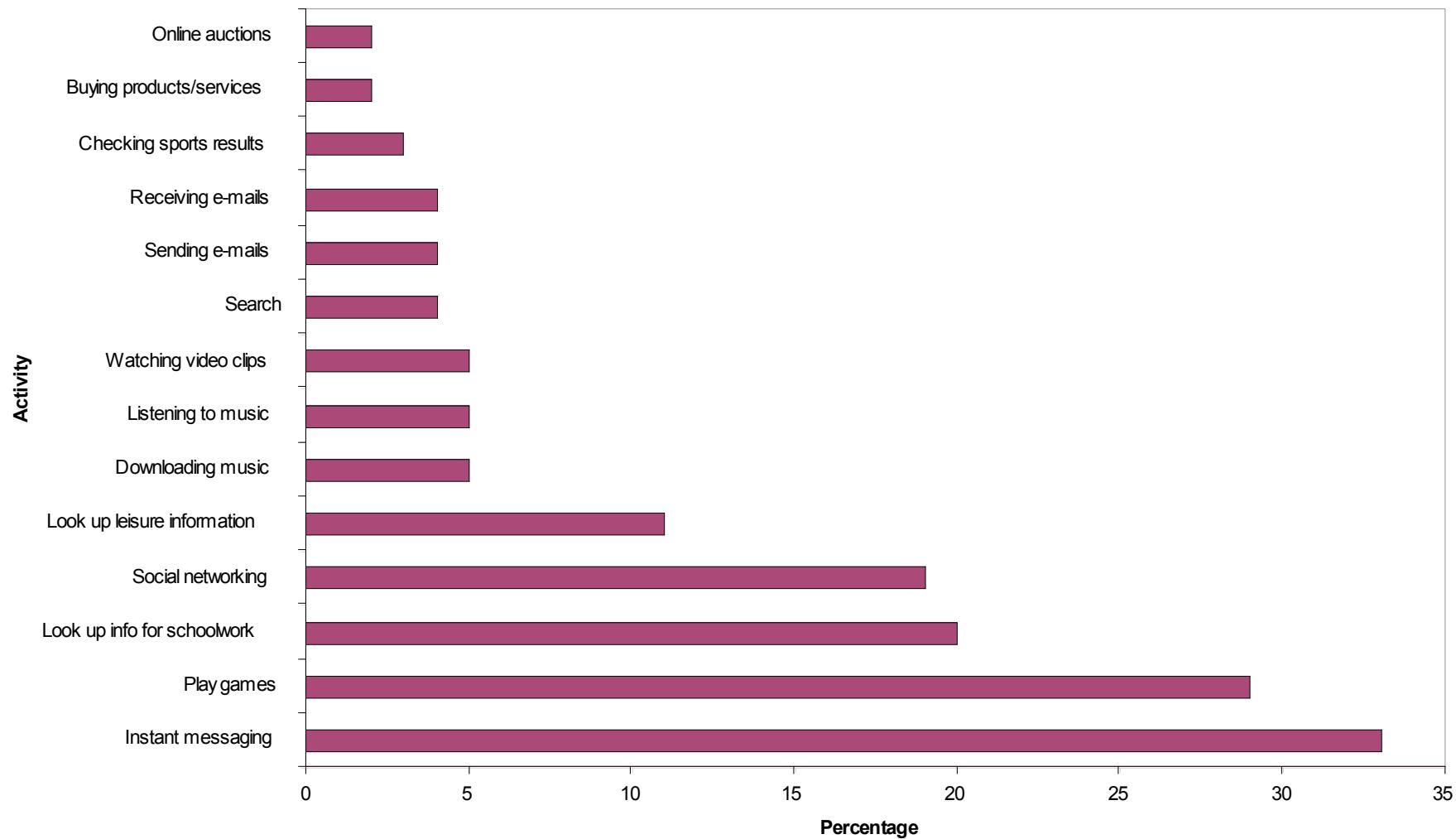
Source: Childwise, 2008, 1.13.

Figure 3.11 Social Networking Sites Visited (7-16 year olds who use the Internet)
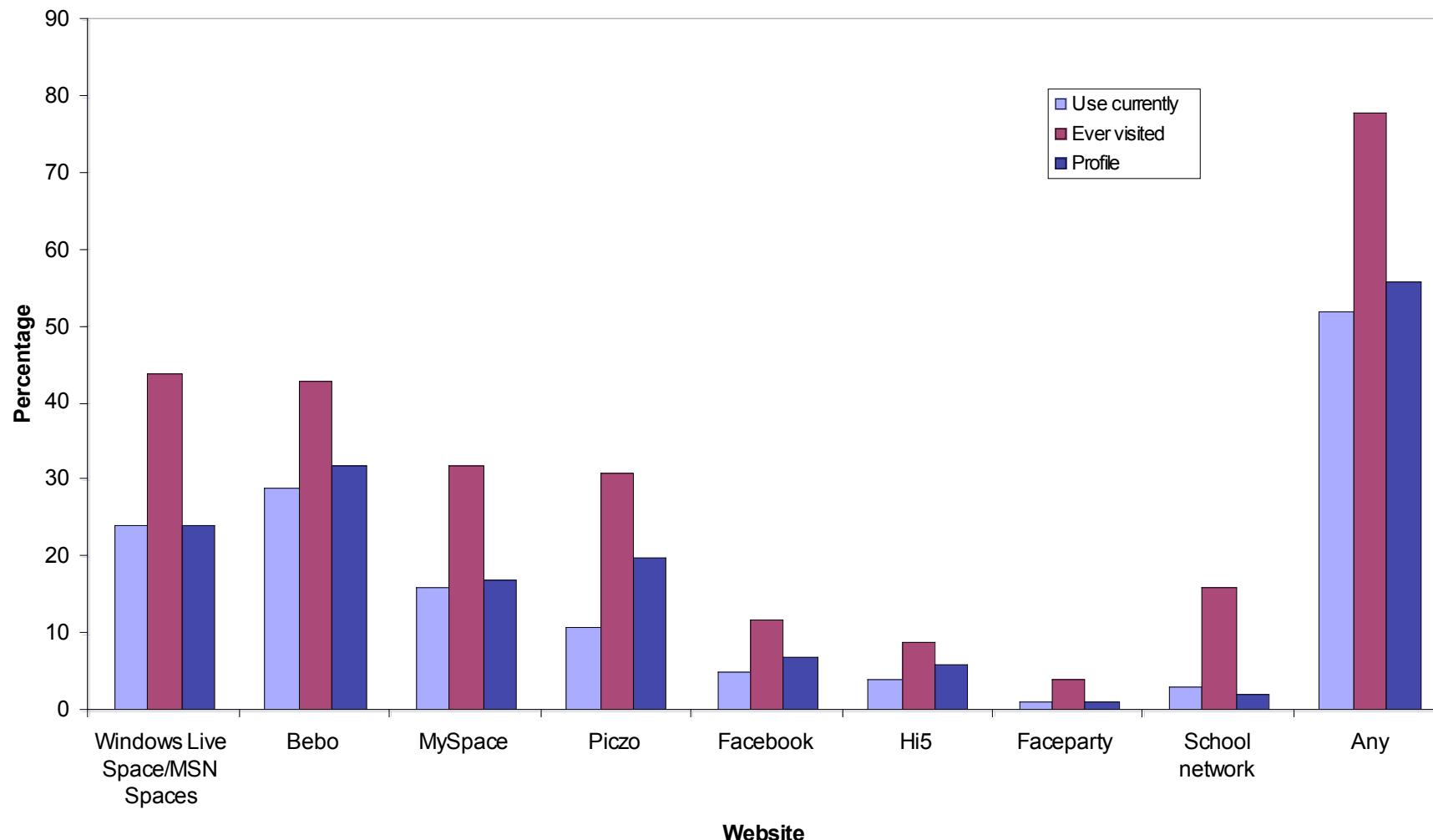
However, it is worth mentioning that children seem to have a relatively low recall of internet adverts, with only a quarter able to remember seeing any sort of advertising on the Internet (Childwise, 2008, 10.7-8). This figure could be taken as indicating web advertising's relative ineffectiveness. Alternatively, it could suggest that as advertising becomes more integrated into the general content of websites it is increasingly taken for granted as part of the overall array and flow of materials and activities. Among those who remembered seeing advertising, six per cent recalled seeing gambling adverts (Childwise, 2008, 10.7). Although this is not a high percentage, it highlights some of the challenges facing the regulatory bodies. Many children use the Internet to check sports results for example, and sports websites often include adverts for gambling.

3.4   Games Consoles

According to the Childwise data, by 2000 three-quarters (76 per cent) of 5-16 year olds owned a games console. By 2007 that figure had risen to 87 per cent (See Figure 3.12).

Figure 3.12   Games Console Ownership at Home
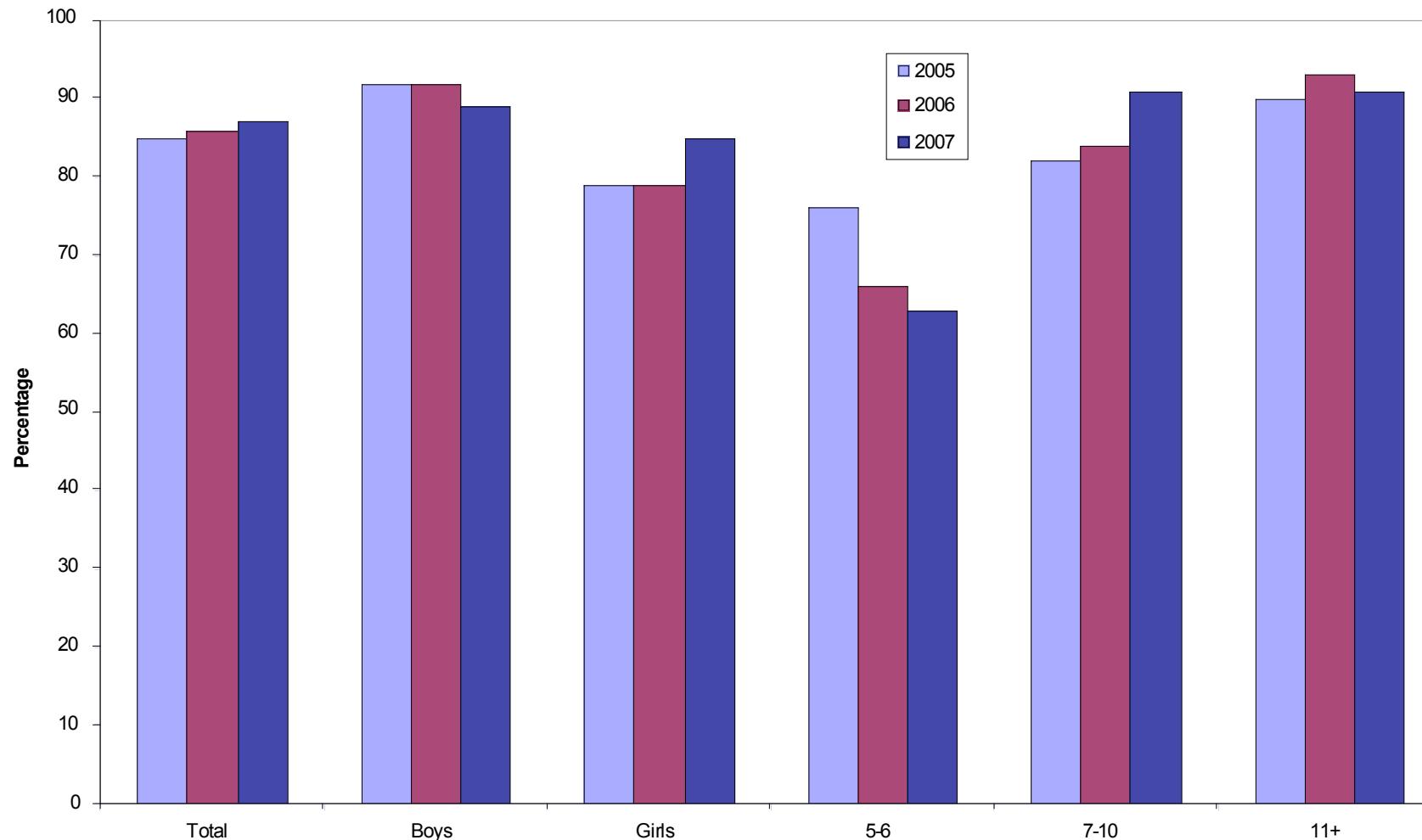
According to the Childwise data, console ownership is higher among children in households connected to the Internet at home, 90 per cent as against 77 per cent in unconnected homes, reflecting the growing popularity of online games, such as Halo 3 (Childwise, 2008, 2.2). Over the last three years, however, the number of 5-6 year olds with a games console at home does appear to have decreased (Childwise, 2008) coinciding with the increased percentage of the youngest age group going online, suggesting, perhaps, a move away from playing games on consoles to playing games online, including the 'advergames' provided on company websites.

As Figure 3.13 shows boys are much more likely to own their own console, a cause and an effect of the majority of console games being aimed at boys (Internet Advertising Bureau, 2007). With the increase in games consoles ownership and the growing size of the gaming audience, estimated at nearly half a billion people globally (Internet Advertising Bureau, 2007) ad spending on in-game advertising is likely to increase, with some commentators suggesting that the market will be worth $1.2 billion by 2010 (Internet Advertising Bureau, 2007, p27). As a consequence, young people are increasingly likely to encounter advertising when playing games on consoles and online. Recent industry evidence suggests that as long as advertising is not intrusive, this will not be an issue with most gamers who tend to see in-game advertising improving their enjoyment of the game by making synthetic environments more realistic (Internet Advertising Bureau, 2007, p21). Gamers also welcome the revenue advertisements bring in for game development and reducing the cost of buying games (Internet Advertising Bureau, 2007, p21, 23).

Figure 3.13 Games Consoles at Home, and Own Consoles (2007-2008)
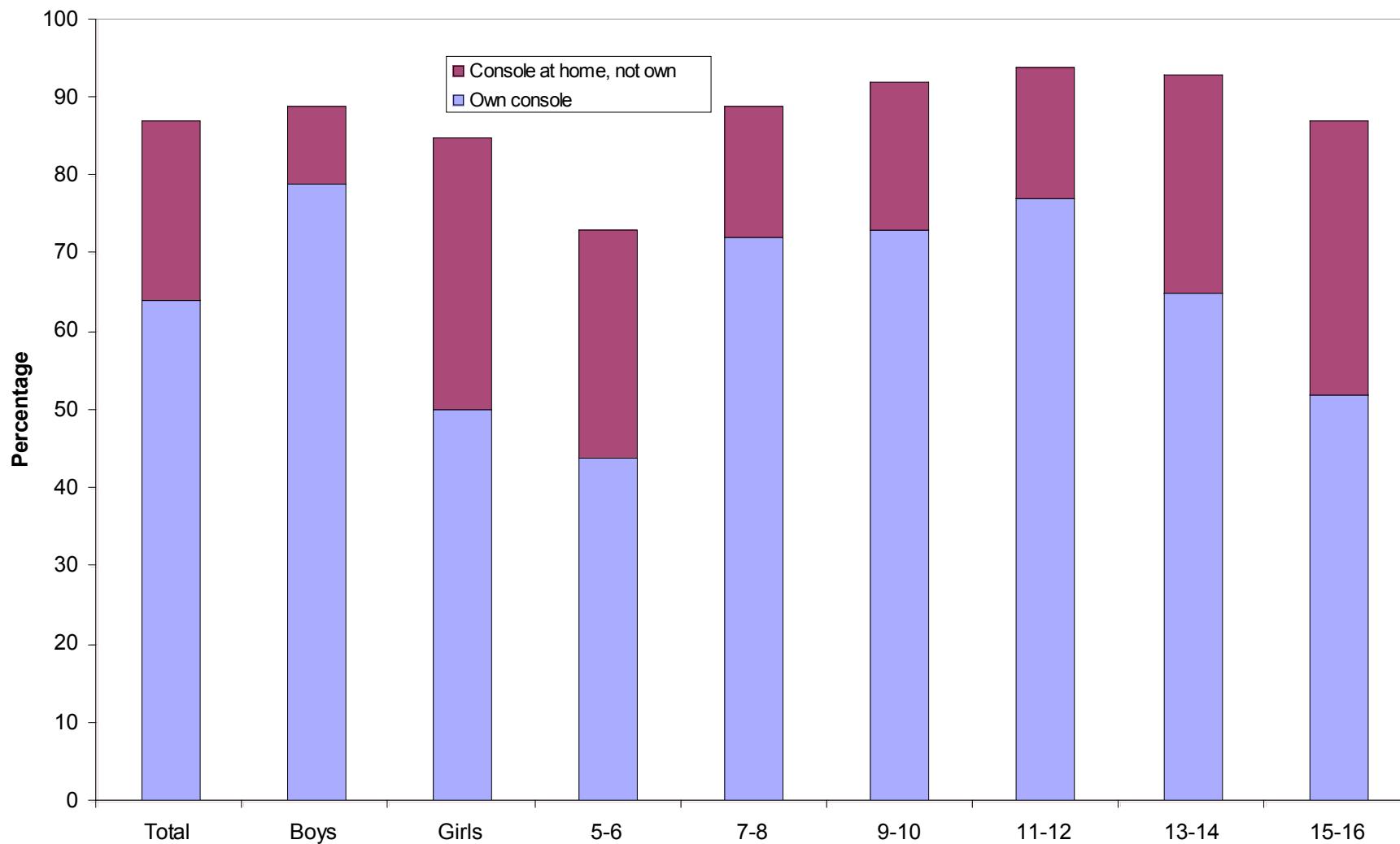
Source: Childwise, 2008, 2.2.

3.5   Mobile Phones

Mobile phone ownership among 11-15 year olds has increased from 70 per cent in 2003 to 88 per cent in 2006 (BHPS, 2003/2006) with almost universal coverage (92 per cent) among 13-15 year olds (BHPS, 2006) and substantial ownership (40 per cent) among 5-10 year olds (see Figure 3.14). Ofcom data suggests that among 5-7 year olds 13 per cent of boys and 22 per cent of girls own or have access to a mobile phone, with four per cent of all children in this age group using a mobile phone every day (Ofcom, 2008a, p345). This data points to a generation growing up increasingly comfortable using mobile technology. As the Mobile Broadband Group suggests, being always contactable by parents may allow young people greater freedom to roam further from home and restore some childhood freedoms (Mobile Broadband Group submission to DCSF, 2008).

Figure 3.14 Mobile Phone Ownership
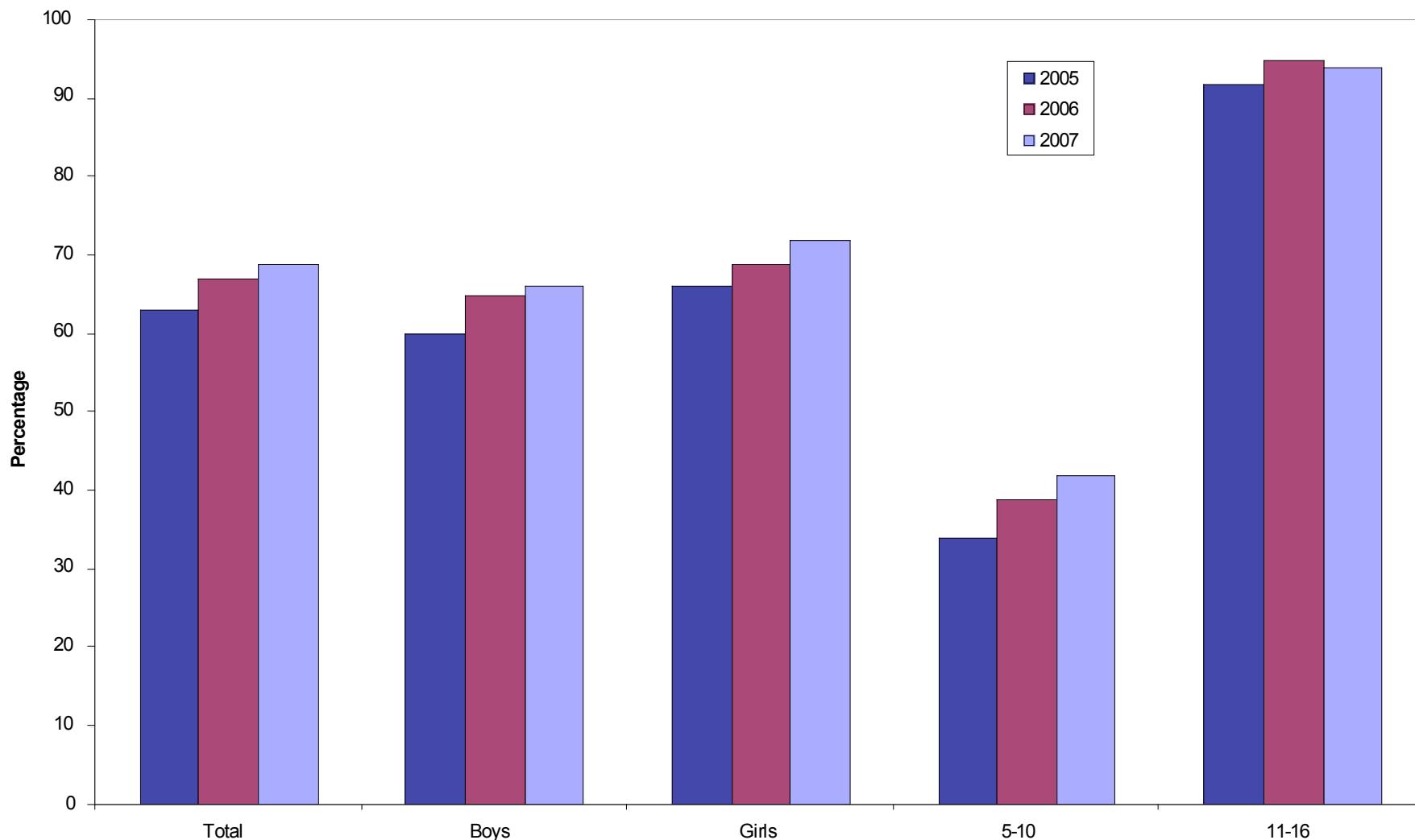
Source: Childwise, 2008, 3.2.

Figure 3.15 Activities Carried Out on Mobiles
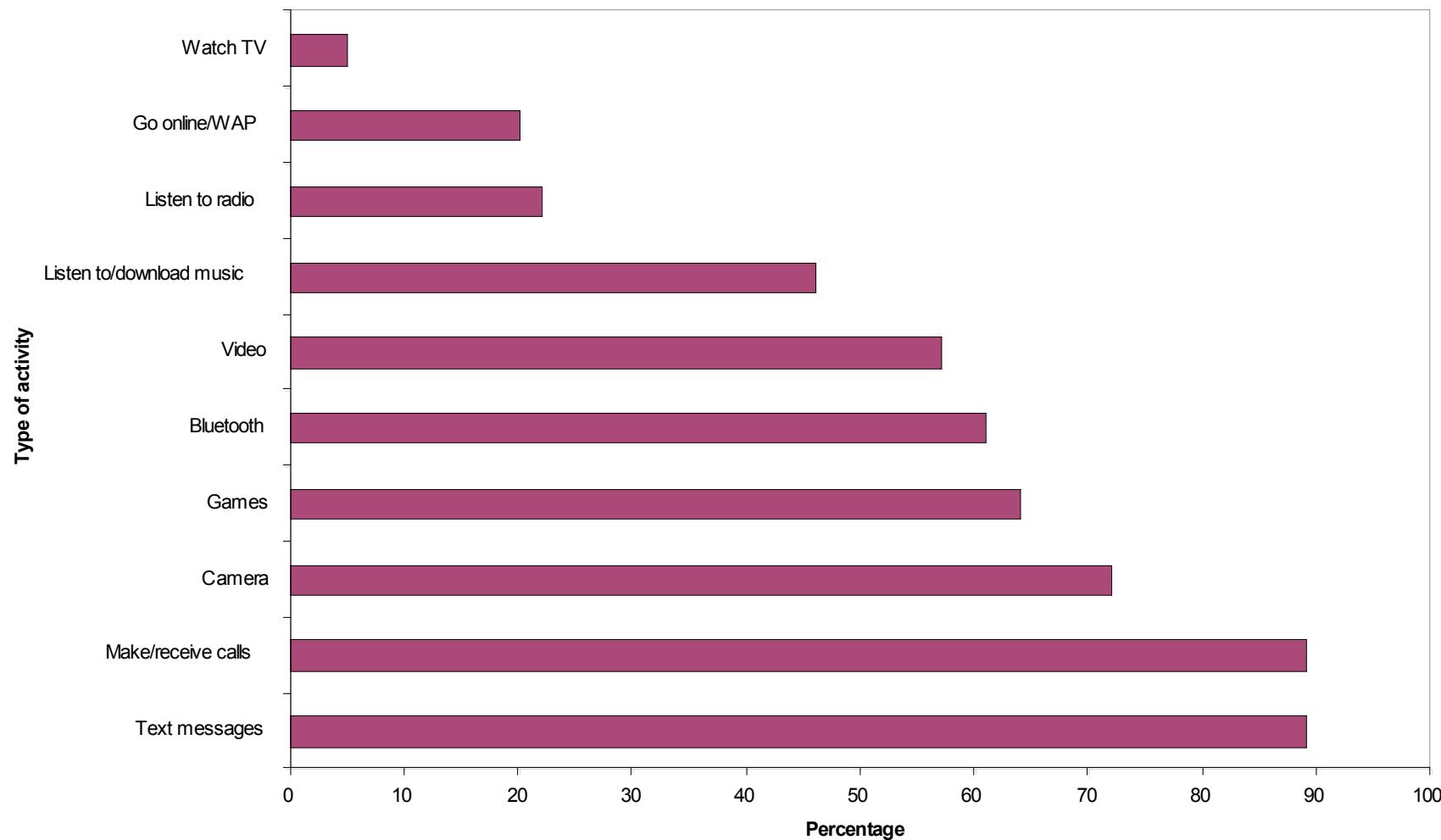
Source: Childwise, 2008, 3.3.

As we can see from Figure 3.15, although making calls and sending texts remain the most frequently used functions, young people are using their mobiles for a wide range of additional activities, some of which provide platforms for purchasing. Downloading music for example, allows children to engage in low-level commerce by charging the cost to their mobile account (Mobile Broadband Group submission to DCSF, 2008). We will examine the ways mobile phones are being used as a marketing tool in Chapter 4. The ASA has jurisdiction over text message advertising which is, therefore, subject to the same guidelines as other non-broadcast advertising. The ASA issued its first ruling on a text advert in 2001, since then the number of complaints has increased, with a sharp rise from 41 in 2006 to 257 in 2007 (Advertising Standards Authority, 2007a).

3.6   Media Stacking

One final but very important point to note about children and young people's media usage is that there is a growing trend for them to consume several media simultaneously; a phenomenon known as media stacking. Of the 5-15 year-olds in a recent Ofcom study, 60 per cent said they used another media device while watching TV or while using the Internet, although this was more likely to be the case with older age groups. Among 8-15 year-olds 38 per cent used the Internet while watching TV, 41 per cent used their mobile while watching TV, and 35 per cent used their mobile at the same time as using the Internet (Ofcom, 2008a). These figures suggest that young people have the ability to instantly jump between media platforms, so that a television viewer seeing a product advertised on TV, will be able to access the Internet to find more information, or even to purchase it (Internet Advertising Bureau, 2008). This new mobility offers enhanced opportunities for advertisers to develop integrated campaigns that engage with young people across a variety of media platforms.

3.7   Summary

With increases in children's access to multi-channel TV and the Internet and in mobile phone and games console ownership, it is clear that young people now have an expanded choice in their media usage. While each media platform individually offers children much more choice, with more TV channels and internet sites aimed specifically at children, there has also been an increase in content moving across and between different media platforms. Children can now watch TV via the Internet, access the internet via their mobile phone or go online on their games consoles. Children also have much more choice about how they wish to use the media available to them within their home. With many children now having their own TV, games console or computer, they are able to make their own decisions about what they wish to watch, play and access. Equally, it is arguable that with more children now owning a mobile phone, they are likely to have more freedom and independence because they are easily contactable. The question for regulation is how best to allow children to take advantage of this expanded choice while protecting them from harm and offence. Children now have more unsupervised time using new media, meaning that adults may be unaware of whether their children are viewing adverts that are unsuitable for them. Children's increasing ability to multi-task and move between different media platforms also poses new issues for regulation and it is, therefore, important that regulation takes accounts of these

developments in technology. For example, although the ASA has powers to regulate text message advertising on mobile phones, it has no jurisdiction over the company websites the message might direct users to. However, regulation must also ensure that children's choice is not seriously curtailed. Chapter 5 discusses issues of regulation in more detail.

4 INTEGRATING PROMOTION, CULTIVATING ENGAGEMENT

4.1 Introduction

In this chapter we turn our attention to the ways contemporary marketing and advertising are using established and emerging media to target children and engage them actively in the processes of promotion. Although a number of techniques have an established history (as outlined in Chapter 1) the rapid expansion and convergence of new digital technologies is also creating new ways to reach and actively engage children as partners in marketing and advertising. We also explore developments in sponsorship and how its expansion into a wide range of areas is intensifying children's exposure to commercial messages. Finally we note that a number of emerging areas of promotional activity fall outside the scope of the current regulatory system.

4.2 Branding

For marketers, the value or equity of a brand is based on everything it evokes in minds of consumers including experiences, images and associations (Nairn and Fine, 2008:7). Linking brands to enjoyable experiences, valued personalities, and positive feelings is, therefore, central to contemporary marketing. These connections are cemented if promotion can create a 'buzz' around the product, getting it talked about by users and commentators (Marsden, 2006a: xvii). Integrating advertising into locations, events, and media forms that are already popular is one major way to achieve these goals.

Some associations between brands and events and entertainments are clearly announced, as with the sponsorship of television programmes. Others, such as the orchestrated placement of products in films and television programmes are more covert. Others again, such as paying teenagers to talk up brands among their friends, are expressly 'designed to communicate a marketing message while purposely concealing the source of that message' (Martin and Smith, 2008:46). These techniques of 'surreptitious' or 'stealth' marketing aim 'to get their brands noticed in a crowded marketplace by flying below the consumer radar and catching people at their most vulnerable by identifying the weak spot in their defensive shields' (Kaikati and Kaikati, 2004:6). The fact that they depend on deception and often involve the exploitation of friendships, are clear breaches of the well established principle that advertising should announce itself so that consumers can grant or withhold their informed consent. As discussed in chapter 1 this is a particular problem in relation to children where the research evidence on when they are able to fully understand commercial intent remains in dispute. Even overt forms of integrated marketing pose questions when used with younger children.

4.3 Branded Content

Branded content is content which is clearly linked to a brand, either a particular product or a company. These connections may be relatively visible, as with using fictional characters that children identify with to endorse a product or linking product promotion in with the release of a film. Alternatively, they may be more covert, as with integrating promotional material into games.

4.1.1 Character endorsement

Nairn and Dew argue that the strong attachments and loyalties that children can develop to '…characters they encounter on television, in comics and magazines, in books, in movies, and even through pure merchandising can be exploited if that character is endorsing a product'. They offer the example of the best selling girls' doll, Barbie, endorsing skates and note that although the '…endorsement is labelled as advertising, the label is very hard to spot' (Nairn and Dew, 2007: 34). When the makers of the traditional soft drink Lucozade wanted to rebrand it as a sports energy drink and promote it to older teenagers they turned to Lara Croft the heroine of the best selling action-adventure computer game, *Tomb Raider.* Television advertisement of Lara drinking Lucozade were accompanied by in-store displays of life sized Lara, opportunities to win *Tomb Raider* experiences, and labels on the bottle, renaming the drink 'Larazade' (Farrand et al., 2006).

4.1.2 Media tie-ins and merchandising

Although this promotion was deliberately approached as a celebrity endorsement it has clear affinities with the technique of tying brands in to high profile media products. Coca Cola's 'Zero' brand, aimed primarily at young men, for example, will be relaunched as Zero Zero 7, as part of a global tie-up with the new James Bond film *Quantum of Solace* (Bokaie, 2008). When *Revenge of the Sith,* the latest instalment in the highly successful *Star Wars* series of films, was released, the confectionary firm Mars used its tie-in with the producers to create a Chocolate Mpire on its M&Ms site and offer *Star Wars*' screensavers and downloadable themed toys (Moore and Rideout, 2007:215).

The tie-ins between media programmes and brands can also be more direct. Viewers of the popular teen oriented drama, *Gossip Girl,* on the CW television channel, for example, can go to the show's website and click to order the clothes and music featured in the latest episodes. The express intention is to cultivate impulse buying. As the CW Head of Marketing, Rick Haskins, explains, 'The people we aim our shows at are what I would call the Now Generation. They see something or they hear something on a show and they want it now and that's what we're giving them' (Hughes, 2008:3). This kind of direct buying is only open to young people with a credit card or access to a parental card, but acquisitiveness is cultivated among younger children by the increasing range of merchandise spun off from toys and favourite television characters. Alongside its main rival, Barbie, the doll brand, Bratz, marketed under the slogan 'Girls with a passion for fashion', supports an ever increasing range of playsets, clothing, and accessories. 'Licensed products number into the hundreds, with new fashions, characters and themes being introduced regularly' (McAllister, 2007:248).

Looking after a household pet has long been part of many children's experience. The online community, Neopets (owned by the media major Viacom) encourages children to create or adopt a virtual pet and to care for it. Members are encouraged to earn NeoPoints to buy it food and sustenance and to participate in the Neopia community which offers opportunities to shop for a range of items in a variety of virtual locations. The majority of site members are under 18 and 39 per cent are below the age of 12 (Grimes and Shade, 2005:183).

4.1.3 Sponsorship, product placement and advertising generated content

Sponsorship is a major feature of the media most used by children and young people, films, television and the Internet. The aim is to transfer the positive feelings generated by the movie, programme or video game to the brand by establishing a clear association. The chewing gum maker Wrigley currently sponsors the popular teen oriented soap opera, *Hollyoaks,* in return for which each episode ends with a brief vignette showing the mouth deodorising qualities of the product helping teenagers to get close to each other and having fun with groups of friends. Children watching ITV's digital children's channel, CiTV, are invited to upload their paintings and drawings to a 'Create It' area sponsored by the toy company Flair, a link reinforced by advertisements for Flair on the channel's web site. Although direct programme sponsorship is not permitted for BBC productions the Corporation frequently broadcasts sponsored events. The party in the Mall, celebrating London hosting the 2012 Olympics, was sponsored by Visa, and broadcast on both BBC1 and BBC Radio.

A less overt technique for cementing associations between brands and the characters and settings shown in films and television programmes is through product placement. There are currently no barriers to firms paying to have their products or services featured in films made in Britain. Eurostar for example, funded *Somers Town,* Shane Meadow's film of the friendship between two young boys, set in and around St Pancras, the Eurostar terminus. It ends with a trip on the Eurostar to Paris and a boy showing his ticket to the camera. Although it was widely reported in the media, the film's marketing omits to mention Eurostar's financial involvement. At the moment, paid-for placement is banned in British television programmes, though this is currently under review following a European directive to allow the practice. Children's programmes would be excluded from this arrangement but this would not protect young people entirely. British screens are already filled with product placements both in imported American films and programmes and in British productions where brands have been placed by the prop houses who dress the sets. The prop house, Prop Portfolio, for example, claims to have placed the Audi driven by the lead character in a past series of *Silent Witness* and a Zanussi dishwasher with a prominently displayed brand logo in the hit comedy *Absolutely Fabulous.* With repeat showings on digital channels and release on DVD these placements achieve exposure that extends well beyond their initial broadcast (Nuki and Hellen 1999).

Companies wanting more creative control over the programming they are associated with are increasingly originating their own content. The fashion chain Tommy Hilfiger, for example, is producing a comedy show on the Paramount Comedy channel promoting its range of watches. They are also launching their own branded web TV channel, tommytv.com, featuring content from the company's branded music events.

4.1.4 Computer games

Computer games, played on both dedicated gaming consoles and online, are another major growth area in marketing to children. Games now feature prominently in the mix of spin-off merchandise generated by popular movies and television shows. As Table 4.1 shows many of the favourite games mentioned by children in a recent survey, such as The Simpsons or Harry Potter, were tie-ins, (Childwise, 2008,

2.6) whilst the 'Lego' series of games provides a merchandising opportunity for two products-Lego and popular movies, such as Star Wars.

Table 4.1   Favourite Computer Game

	Total	Boys 5-10 years	Boys 11-16 years	Girls 5-10 years	Girls 11-16 years
10%+			Fifa Soccer		The Sims
5%+	Fifa Soccer The Sims	Fifa Soccer	Halo Grand Theft Auto	Nintendogs Bratz	
3%+	Halo	Grand Theft Auto Need for Speed	Need for Speed Pro Evolution Soccer	The Sims Mario Animal Crossing	Mario
2%+	Grand Theft Auto Nintendogs Mario Need for Speed Bratz	Halo Mario Harry Potter The Simpsons Spongebob Rayman Lego Star Wars	The Sims Wii Sports Football Manager	SpongeBob	Nintendogs Animal Crossing Pro Evolution Soccer Singstar

Static in-game advertising has been employed for a number of years, especially in sports and racing games where brand signage is common-place (Internet Advertising Bureau, 2007) and where 'the cars are fully branded and shown in accurate detail' (Dahl et al., 2007:3). Active engagement with brands is also a feature of other types of games. In 2002, Electronic Arts, producers of one of the most successful games of recent years, *The Sims,* where players control virtual characters as they go about their daily lives, signed a deal with McDonalds to allow users of *The Sims Online* to buy a McDonald's kiosk and sell the company's products to other players (Kaikati and Kaikati , 2004:14).

Opportunities for in-game promotion have been further extended with the rise of the latest generation of games consoles allowing users to play online, such as the Xbox360. The introduction of dynamic in-game advertising (DIGA) allows adverts to be monitored when users are online providing the basis for campaigns that can be geographically localised and continuously updated (Internet Advertising Bureau, 2007). The main attraction of in-game advertising for marketers is that it represents an opportunity for marketers to get their key messages to the traditionally hard to reach young males who spend the majority of their free time playing video games (Internet Advertising Bureau, 2007). There are, though, other advantages to in-game advertising. Firstly, they have a captive audience. Players cannot move away from the game when they see adverts, as they can with a TV, as it is likely that their character will die (Internet Advertising Bureau, 2007). Secondly, they are returned to numerous times, with one estimate claiming that children may play the same game up to 100 or more times (Gunn, 2001). Thirdly, they engage children's attention and associate brands with fun and excitement.

A number of companies have gone a step further and created their own advertising-sponsored games for children to play on their company websites. These 'advergames' are embedded in 'branded environments' that are colourful, animated and filled with corporate logos, brand characters and product packages (Moore and Rideout, 2007:205). They are designed to 'build brand awareness and create favourable views of brands in a context that is designed to be fun and unlikely to trigger a child's developing but immature advertising defenses' (op cit, p 208). In their US Based study of the major food advertisers' web sites in 2005, Moore and Rideout found 546 games designed specifically for children with food items being promoted through brand characters and resonant visual images, such as a chocolate waterfall. A similar study by Dahl and his colleagues, of the major British food advertisers whose products have significant appeal to children found '13 that offered 'fun sections' clearly targeted at children' all of which included at least one advergame (Dahl et al., 2007:10). Of these, ten gave no indication that the main objective was to sell or advertise their products and even in the cases where the site's commercial purpose was mentioned, the information was not easily visible. Children logging onto Kraft's Postopia site for example, needed to scroll down to the bottom of the page to find the warning that the 'games and other activities on this website include messages about the products Kraft sells'. Since no other pages required scrolling most were likely to miss this message. Dahl also found that ten of the sites surveyed asked visitors to send e-cards to friends or to invite friends to visit the site. These techniques were also employed in the sites Moore and Rideout studied leading them to argue that because the e-mails children sent contained news, activities and entertainment favourable to the brand they turned

communications between friends 'into a type of advocacy or endorsement' and raised the question of 'whether it is fair to encourage children to use their social networks to promote a brand, perhaps without their understanding' (Moore and Rideout, 2007:210). These e-mails however are only one aspect of a much larger and rapidly growing marketing strategy based around promotionally driven exchanges between peers.

4.1.5 Sports: sponsorship, brands and endorsements

Sport plays a significant role in children's lives in the UK. According to the Childwise survey, 75 per cent of 5-16 year olds play sport out of school (Childwise, 2008). Large numbers of children watch a sport on television, eighty nine per cent for boys and seventy three per cent for girls, and more than half of all children go to live sporting events (Childwise, 2008). By far the most popular sport is football, with 50 per cent of young people playing it at school; 41 per cent playing it outside of school; 64 per cent watching it on TV and 43 per cent watching it live. Other popular spectator sports named in the survey included rugby, motor racing, cricket and tennis (Childwise, 2008). Advertisers can target young people, especially boys, through sport in two ways: sponsorship of events, teams or players; or endorsements for products from top sports stars.

Numerous events are sponsored by major companies, with football tournaments a prime example. Within the UK, the Premier League is sponsored by Barclays Bank; the Football league by Coca-Cola; the FA Cup by the energy supplier E.ON and the League Cup by Carling. What is notable about this sponsorship is that, according to the advertising codes, some of these sponsors, such as Carling and Coca-Cola, are not able to advertise to under 16s via conventional means. Other events are also sponsored by companies who are not allowed to advertise to younger viewers. The sponsors of the recent Euro 2008 tournament included Carlsberg, Coca-Cola and McDonalds. Coca-Cola sponsored the Official UEFA Euro 2008 Online Album, which offered 'stickers' of various players to collect and to 'trade with your friends' via msn messenger (http://www.euro2008.uefa.com/fanzone/cocacolapanini/index.html). McDonalds, sponsored the online Fantasy football game on the Euro 2008 website (http://en.fantasy.euro2008.uefa.com/). As these sites are not aimed at children, there are no restrictions on advertising or sponsorship. The Olympics games in 2012 is likely to attract a wide range of sponsors, with companies such as McDonalds, Coca-Cola and Cadbury's already official sponsors (http://www.london2012.com/).

Teams also have sponsorship deals. Manchester United is effectively a brand in itself, with products ranging from a TV channel (MUTV), to a mobile phone, to the basic replica kits. However, it also has a number of sponsorship deals, with all of its kit being made by Nike. Nike's major rival, the clothing company Adidas, also sponsor English teams, such as Liverpool and Chelsea. This type of sponsorship seems to feed into the branding of goods in that, when asked in the Childwise survey, 78 per cent of young people recognised the Nike brand, and 71 per cent recognised the Adidas brand (Childwise, 2008).

It is not just football teams that are sponsored. The English rugby team is sponsored by Nike, the English cricket team by Vodafone and Adidas, and the majority of motor racing teams enjoy a multitude of sponsorship deals. Some teams are sponsored by

products which under the advertising codes are not allowed to advertise to under 16s, such as alcohol companies. Liverpool football club, for example, is sponsored by Carlsberg and Everton by Chang Beer. Many clubs also have betting partners with Manchester United sponsored by BetFred and Liverpool by Paddy Power. In 2007 the drinks industry agreed voluntarily to remove alcohol branding on children's replica shirts. Whilst this is a positive step, many children still visit club websites and watch football on television. As football club websites are not deemed to be aimed at children, gambling and alcohol logos are featured prominently, and football matches are not classed as children's programmes, therefore not all advertising restrictions apply.

As well as team sponsorship, individuals can also be sponsored, and this takes place across a wide range of sports. For example, top golfer Tiger Woods is sponsored by Nike in a deal which is the most lucrative athlete endorsement in the world. Former British tennis number one, Tim Henman, was sponsored by Robinsons soft drinks-which was already sponsoring Wimbledon tennis tournament. The sponsorship of individuals is encouraged by UK Sport, and is, in some cases, the only way in which some sports' people, especially in minority sports, can fund their training and competition (http://sponsorship.uksport.gov.uk/). However, sponsorship deals can also be made with big name stars, as a way to increase brand recognition. For example, top Portuguese and Manchester United footballer Christiano Ronaldo is sponsored by, among others, Nike. Sponsoring an individual may be a risk, however, the good publicity which arises from a spectacular achievement may be worth the risk, as Speedo discovered after pledging to give American swimming star Michael Phelps $1 million if he won more than seven gold medals in the Beijing Olympics. When he won eight gold medal, breaking seven world records in the process, much of it was put down to Speedo's new swimsuit, garnering them unprecedented publicity (http://www.speedo.com/webapp/wcs/stores/servlet/FSContent_10151_10202_-1_//content/explorespeedo/news/latestnews/latestnews-966.html). This is a good way for advertisers to reach children, who may follow the exploits of their favourite sports' stars for years and years and create a loyal customer base.

Finally, as has been mentioned elsewhere, celebrity endorsements are a good way to reach a wide audience. For example, Pepsi regularly pay top international football stars, such as David Beckham, Thierry Henry and Ronaldinho, to appear in their adverts. Other past and present sports' stars promote various products, with Gary Linekar famously advertising Walker's Crisps, David Beckham is the face of Armani clothing company, Wayne Rooney advertises Coca Cola, and after the 2004 World Cup rugby player Johnny Wilkinson signed up to promote travel company Travelex. Such sponsorship deals often involve these celebrities appearing in adverts for these products. This does mean, though, that they are subject to the advertising regulation, unlike sponsorship of teams events or individuals.

4.1.6 Branded relations
Marketers have long understood that personal recommendations from trusted friends are a particularly valuable and effective form of product endorsement. Given the centrality of peer group relations in the social lives of children, mobilising contact networks in the service of selling is an obvious promotional strategy to pursue. This is the basis of viral marketing, so called because it spreads promotional messages

from person to person like a virus or, as it is also called, connected marketing, because it capitalises on the social connections between people (Kirby and Marsden, 2006). Connections can be activated either through personal contact and word-of-mouth, or through communication over the internet, 'word of mouse'.

4.1.7 Talking brands

In 2001, Procter & Gamble, the food and cosmetics major, began recruiting children to a new network, Tremor. Applicants were carefully screened to identify opinion leaders with only one in ten being successful. Members participate in developing promotional strategies of a range of products, from recommending which fashion model to use in a Pantene commercial to selecting the backing music for a Pringles advert. In return they are given exclusive previews and samples of new products. 'By giving opinion-leading teens a voice in how new products are commercialised, the Tremor panel creates a sense of ownership and involvement...and transforms panel members into loyal adopters and vocal word of mouth advocates' (Marsden, 2006b:13). The panel's website promises companies that 'your brand's 'talkable' message is amplified through waves of communication to your target consumers by an advocate' (P&G, 2008). These young brand ambassadors are not obliged to declare that they are working for Tremor when talking to friends.

A similar site, Headbox, was launched in the UK in 2008 by the Face Group as 'a research and seeding community for 30,000 15-25 year olds who share their thoughts, their opinions and their ideas and get rewarded for it' (Needham, 2008:62). In addition to cash payments for sharing ideas, members are offered a sense of being 'in the know' and valued through, 'the chance to get your hands on free products before anyone else' and 'the opportunity to express your views (via our partners) on TV, Radio or in the press' (Headbox, 2008). Headbox members make extensive use of their pages on social networking sites to share their experiences. The 18 members who took part in a Unilever product design seminar talked animatedly about it for days on their Facebook personal pages, reaching over 10,000 users with one member reaching over 1,500 friends on their site. Traffic also flows the other way with an estimated 17 per cent of 16-25 year old including brands among the 'friends' listed on the social network profile pages (Needham, 2008:61). These interchanges are part of much wider pattern of communication.

4.1.8 Branded connections

The rapid growth of social media sites is one of the defining features of the general growth of the second generation Internet. Web logs (blogs) and social networking sites are attracting particular attention from marketers.

Most blogs are written by individuals as vehicles for their individual experiences and opinions. This offers marketers an opportunity to disguise promotional material as personalised communication. This can be achieved either by companies writing their own blogs (known as 'flogs') or encouraging bloggers to write on their behalf. To generate interest in their new video game Sega's advertising agency created an imaginary blogger Beta Seven who posted a review on his blog claiming that the game triggered blackouts and should be banned, thereby increasing the buzz around the product (Corcoran et al., 2006:152). In 2003, the soft drink manufacturer Dr Pepper invited a group of young bloggers (in their late teens and early 20's) to talk up its new milk based line, Raging Cow, which came in a range of flavours including

'Chocolate Insanity'. The bloggers, and their parents were flown to the firm's headquarters for a week's briefing. They were invited to link their blog to the company site but instructed not to declare that they were working on its behalf. When news of the deception leaked out, however, it led to calls for boycotts of the product in the blogging community. This incident illustrates that social networks can amplify unfavourable publicity as well as positive endorsements. One way to avoid negative reactions is to incorporate blogs into entertainment formats, emphasising shared experience rather than product recommendations. Analysis by Hitwise, revealed that 'Facebook' was the most searched for term on the Internet in the UK in May 2008, with two other social networking sites, Bebo and MySpace, also featuring in the top ten (UTalkmarketing, 2008a).

In 2008, as part of their launch for their new teen oriented film, *Angus Thongs and Perfect Snogging,* Paramount arranged for the lead character, Georgia, to post a video blog on the personal profile site it had arranged around her on the popular teen social networking site Bebo. The site combined promotional material for the film, including wallpaper and a screensaver, with invitations to users to join as friends. The audience for the blog was further amplified when it was watched by the lead character in *Sophia's Diary,* the popular drama shown exclusively on Bebo.

This link is part of wider series of brand inclusions designed to create a network of interlocking connections between products and users. *Sophia's Diary* is sponsored by Pearl Drops Instant White. One of the characters, a make-up artist for a fashion magazine played by real life make-up artist, Rachel Wood, not only demonstrates the product in the show but has her own Bebo profile, which girls can join as friends, offering beauty tips (UTalk Marketing com, 2008b). The other major social networking site, Facebook is pursuing a similar personalised strategy, through its 'engagement advertisements'. This involves users inviting friends to become fans of a brand, sending them their comments on advertisements they have viewed, and cementing loyalty through dedicated advertiser-created gifts. The aim is to get 'brands to interact with consumers in the same kind of way consumers interact with each other' (Brand Republic, 2008).

In pursuit of this aim advertisers are exploring a range of ways of using social networking sites, a development that has generated a 72 per cent rise in ad-spend in this area globally in the last year (Sweeney, *The Guardian*, 2008). A number of companies have teamed up with social networking websites to launch products, such as Xbox360 launching Halo 3 on MySpace (Internet Advertising Bureau, 2007). Online retailers, including Nike and Amazon, have developed profiles on various social networking websites with the aim of cementing connections with potential consumers (e-marketer, 2008).

Social networking sites also offer new opportunities for identifying individual consumers and personalising promotional appeals. Contextual advertising employs automated systems to display user-specific content but can provoke negative publicity and reaction. Software which published details on Facebook about users' activities elsewhere on the Internet, was eventually obliged to become 'opt-in only' after more than 50,000 users protested against the invasion of privacy (Johnson, *The Guardian*, 2007). However, Facebook has launched 'Social Ads' a software package which tailors display advertising to the users' specific interests.

As we noted earlier, alongside Internet use, mobile phone ownership is also growing rapidly among children under 10 and is almost universal among those over 12. Not surprisingly, finding ways to employ this taken-for-granted activity for promotional purposes is attracting growing interest among marketers with 'drive to purchase' messages sitting alongside content designed to attract users attention, as in the following text message sent to members of the mobile database linked to the teen magazine, *Bliss*;

> *'Go buy nu Bliss wiv FrE Pineapple flip-flops! Exclusiv Rachel Stevens interview, 368 style tips & Discova ur summa luv destiny Tip: buy a kaftan!'*
> (Jenkins, 2006:60)

Other companies are using the additional functions on mobile phones, particularly built in cameras, to build more interactive relations between brands and young consumers. In November 2008 Pepsi launched a campaign inviting users to take a photo of the quick response code carried on its cans and bottles with their mobile phone and be automatically directed to a site offering a variety of free mobile content, from ringtones, to racing games, and personal advice. As Pepsi UKs marketing manger explained the company aimed 'to connect with, and engage, consumers in a new and exciting way wherever they are' (Lovell 2008).

These instances are part of a growing trend. A recent survey of mobile phone advertising found the most successful campaigns are 'mainly targeted at youth audiences' arguing that young people are more receptive than older consumers (Park, Shenoy and Salvendy 2008:369). This point is confirmed by a 2007 survey of UK 11-20 year olds by Q Research that found that 71 per cent were willing to accept advertisements on their mobile phones providing they were relevant to their interests. A small minority (53 per cent) stated a preference for video material as opposed to simple text, although many said they would be deterred by the costs of receiving visual advertisements (Leggatt, 2007). This barrier has been addressed by Blyk which offers young people between the ages of 16 and 24, 43 free minutes of calls and 217 free texts each month, on any UK mobile network, plus privileged access to news on a range of popular brands, in return for receiving advertising from their clients. By October 2008, a year after its initial launch, Blyk claimed to have 200,000 members (Blyk UK Blog 2008:1) and had hosted promotional campaigns for brands in a range of markets, from Lucozade Energy to L'Oreal Studio Line hair styling products, and the weekly magazine 'Heat'. Postings on the company's website suggest that it has succeeded in becoming a virtual 'friend' to a number of its users.

> *'Efficient and faithful…I love you blyk becoz u love me.'*
> (Natalie,Rainham)

> *'The best thing so far, has been blyks personal touch to their network messages, it almost feels like blyk is a person.'*
> (Muhammad, London) (Blyk Blog 2008:2)

Cultivating the 'personal touch' can also raise issues of privacy, however. It is possible to use the navigation function of a mobile phone to identify users' locations

and to install software that would search their messages for key words designed to tailor advertisements to their particular interests. As Motorola's chief marketing officer noted, 'You figure out if the person is going out for dinner or shopping and trying to find a particular retail outlet for example' (Judge 2007:1). Whether this form of collection and use of personal data should be allowed is a matter of debate.

4.1.9 Cultivating engagement

The opportunities for enhanced interaction between producers and consumers is one of the major features of digital communication, particularly over the Internet, and one that marketers have been quick to capitalise on. Building active participation into promotional web sites is now standard practice. In 2000 the New Zealand branch of the major ad agency, Saatchi and Saatchi, devised a dedicated video game, 'Beat Rugby' to promote Adidas's sponsorship of the All Blacks rugby team. Aimed at 12-20 year old sports fans, it invited players to participate in a virtual rugby tournament with the eventual winners being flown to New Zealand to meet the actual team. The competition was embedded in a branded sporting cybercommunity that offered users a range of other ways to engage with Adidas (Scherer, 2007: 475).

The next step in cultivating young people's engagement is to offer them the opportunity to become 'co-creators' of promotional material (Zwick, Bonsu and Darmody, 2008). Doritos corn chips, which are aimed specifically at 16-24 year olds, successfully revived interest in the product by inviting consumers to devise new advertisements for the product and to vote for their favourites when the entries were posted on the social sites most used by teenagers, including Facebook and Youtube. The finalists canvassed votes by creating their own Doritos blogs and dedicated Facebook pages. The competition was hugely successful, attracting 1,300 entries (over six times more than the original target of 200), 12,000 fans on Facebook, and 890,000 views on Youtube, making it the site's second most viewed sponsor channel (www.UtalkMarketing.com, 20008c). These initiatives pose obvious issues of intellectual property, but beyond that their increasingly immersive quality raises wider issues of regulation in a situation where current rules are lagging some way behind developments on the Internet and where campaigns are increasingly moving between multiple promotional sites and across geographical borders. Traditional regulatory arrangements are still based mainly on an analogue model, taking account of each medium's separate national history, capacities and perceived influence. How far this is adequate to a landscape characterised by increasing convergence is open to debate.

4.2   Summary

While recent developments in digital media have facilitated new forms of marketing, with integrated promotion becoming more popular with advertisers, traditional techniques remain important. Product placement and branding are still major components of advertising and marketing strategies although new technologies allow marketers and advertises to be more flexible in how they make these approaches work for them. We also see the growth of commercial sponsorship. This has expanded into a wide range of areas, especially related to sport, bringing commercial messages into the everyday lives of children in a variety of ways. We have also started to see an increase in other more covert or 'stealth' marketing techniques, such as using bloggers to promote products, and advergames. Finally it is worth

highlighting (although it is discussed further in the next chapter) that much of this new advertising to children is not covered by the current advertising regulations, and raises questions around wider issues such as intellectual property rights and privacy.

5   REGULATION AND RESPONSIBILITY

5.1   Introduction

In this chapter we turn our attention to the regulation framework for marketing and advertising. It outlines the main structures and processes in place showing how the system is presently meant to work to protect children. In the final part of the chapter we explore what the challenges are of the changing environment of digital media for the existing regulatory framework and identifying gaps and weaknesses that may need to be addressed.

5.2   Self Regulation

The regulatory regime is the outcome of the balances struck between the requirements of marketers and advertisers, the policy and spending priorities of government, the pressure exerted by lobby groups concerned with children's welfare, and the media coverage of contentious issues such as childhood obesity and teenage binge drinking. Marketers currently feel they are under undue pressure, unfairly blamed for social issues that have multiple causes and faced by demands for increased regulation based on incomplete or inaccurate information. This has prompted vigorous rebuttals of the cases made by critics, as with The Advertising Association's report on changes to food advertising (Advertising Association Food Advertising Unit, 2007).

Faced with criticism, marketers are concerned not simply to demonstrate their commitment to avoiding doing harm but to display their positive commitment to improving children's health and welfare as with the Advertising Association's initiative, 'Get Fit for 2021'. These demonstrations of corporate responsibility are supported by a range of self regulatory systems and voluntary codes which enable the advertising industry to self-regulate without additional government intervention. Some codes of practice are operated by individual companies, others are promoted by industry wide bodies operating in particular sectors such as The Portman Group which represents the drinks industry (Portman Group, 2008). But there are limits to their reach. Not all major drinks suppliers are members of The Portman Group for example. These gaps are addressed by government regulation. The current co-regulation model is the outcome of the general regulatory shift towards 'lighter touch' systems, delegating the day-to-day business of enforcing codes of practice to industry bodies.

5.3   Co-Regulation

The Committee of Advertising Practice (CAP), made up of members drawn from the advertising agencies, media owners and the advertisers themselves, draw up a Code of Advertising, Sales Promotion and Direct Marketing (The Committee of Advertising Practice, 2005). Advertisers are expected to abide by both the spirit and the letter of the Code. This requirement is enforced by the Advertising Standards Authority (ASA). This was established in 1962 to act as an independent regulatory body for the advertising industry. It is funded by the industry through levies on the cost of advertising space, which are collected by two separate agencies (Advertising Standards Board of Finance and Broadcasting Advertising Standards Board of

Finance) to preserve the independence of the ASA.[2] The CAP Copy Advice Team can advise advertisers, before they place adverts, on whether they are in line with the Code. Getting advice does not preclude the possibility of an investigation by the ASA, but complaints are much less likely to be upheld (The Committee of Advertising Practice, 2005).

Since 2004, the Office of Communications (Ofcom) has contracted out the responsibility for broadcast (TV and radio) advertising to the ASA system in a co-regulatory partnership. The Broadcast Committee of Advertising Practice (BCAP) which includes broadcasters and advertisers, compiles the TV Advertising Standards Code (The Broadcast Committee of Advertising Practice, 2004a), the Radio Advertising Standards Code (The Broadcast Committee of Advertising Practice, 2004b) and the Rules on the Scheduling of Television Advertisements (The Broadcast Committee of Advertising Practice, 2004c). The ASA is responsible for ensuring that adverts comply with these Codes, and since 2004 has become a 'one-stop shop' for advertising complaints (Advertising Standards Authority, 2006). Broadcast advertising has a clearance centre, Clearcast, which checks adverts before they are aired to ensure that they abide by the Codes (Clearcast, 2007). Though the codes are, in some cases, backed by legislation (Her Majesty's Stationery Office 1988, HMSO, 2003) there is no legal requirement to abide by them. However, in recent years the authority of the ASA has been upheld by the High Court (Advertising Standards Authority, 2005). Thus, the system of self-regulation and co-regulation has become the accepted means of controlling the advertising industry.

The Codes of Practice have specific sections on children. The rules state that no advert which is aimed at or features children should:

•   contain anything that is likely to result in their physical, mental or moral harm;
•   exploit their credulity, loyalty, vulnerability or lack of experience;
•   make them feel inferior or unpopular for not buying the advertised product;
•   encourage children to pester their parents to buy the product; and
•   not be presented in a sexually provocative or sexualised manner
(Advertising Standards Authority, 2008a).

Adverts which are deemed inappropriate for children can be subject to restrictions on when or where they can be shown. There are certain products which cannot be advertised to children at all, including alcoholic drinks, medicines, slimming products and anything related to gambling (The Committee of Advertising Practice, 2005).

New rules have been introduced concerning the restriction of advertising of foods which are high in fat, salt or sugar (High in Fat Sugar and Salt) to under 16's. Adverts must avoid anything likely to encourage poor nutritional habits or an unhealthy lifestyle in children (The Broadcast Committee of Advertising Practice, 2004c). Promotional offers may not be used in HFSS product advertisements targeted directly at pre-school or primary school children, and promotional offers should not encourage children to eat or drink a product only to take advantage of a

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[2]   0.1 per cent on all advertising space and 0.2 per cent on direct mailing-giving the ASA an income of approximately £8 million a year.

promotional offer (The Broadcast Committee of Advertising Practice, 2004c).
Licensed characters and celebrities popular with children may not be used in HFSS
product advertisements targeted directly at pre-school or primary school children
(The Broadcast Committee of Advertising Practice, 2004c). In non-broadcast
advertising these rules apply to adverts for all food and drink products except fresh
fruit and vegetables (The Committee of Advertising Practice, 2005). In broadcast
advertising no advert for HFSS products may be shown during programmes which
are likely to have particular appeal to children up to the age of 16, defined as
programmes which are watched by 20 per cent more children than the actual
proportion of children in society (Advertising Standards Authority, 2008b).

5.4   The Effectiveness of Regulation

If the ASA rules that an advert breaches any of the Codes, they have a number of
options available.

1. Often the bad publicity from having a complaint upheld is seen as enough to
   ensure that advertisers comply with the rules in future.
2. The ASA can request that an advert does not run again in its current form,
   media are warned not to carry the advert and the ASA compliance team
   monitors whether this is adhered to.
3. An Ad Alert can be issued which informs the media about a problem advertiser
   and asks that the Copy Advice team be consulted before any media outlet
   accepts advertisements from that advertiser.
4. Further sanctions can be applied, with advertisers required to have all adverts
   pre-vetted by either the Copy Advice team or Clearcast for a set period of time.
5. If advertisers still persist in running misleading or offensive adverts, then they
   can be referred to either the Office of Fair Trading or Ofcom for further legal
   action.[3]

The regulatory framework for advertising is complex, with a number of bodies
responsible for different aspects. In 2004 the ASA became the 'one-stop shop' for
complaints, meaning that all complaints for TV, print, radio, Internet display
advertising and text messages could be made to the ASA. The ASA has also started
publishing all of its adjudications online, on a weekly basis, which helps to promote
its work (http://www.asa.org.uk/asa/). However, of the total number of complaints in
2007, 76 per cent were not investigated, meaning that the issues raised by the
complainant are not covered by the advertising codes (Advertising Standards
Authority, 2007a). This suggests a lack of understanding on the part of the public
about what the advertising codes cover. The ASA's own research suggests that
there is a general satisfaction with the complaints procedure, although there is no
independent evidential base showing whether the general public know about the
ASA, or what they think of the system for regulating advertising in the UK. This

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[3] Ofcom can threaten to revoke a broadcaster's license if they insist on running an advert (this is
especially useful for shopping channels). OFT can only deal with adverts that are misleading rather
than those which just break other aspects of the Code (unless they contravene any other laws e.g.
Obscene Publications). They can obtain injunctions against the company responsible to prevent the
advert from running again. If the company breaks the injunction then they can end up in court and are
'liable to be penalised accordingly' (The Committee of Advertising Practice 2005).

seems to be a major gap in our current understanding of the effectiveness of the existing system.

While we should be concerned about this gap in our current knowledge there are strengths to the self-regulatory system. It can respond quickly to current issues, for example, the ASA has been able to take the public's concern about violent images in the media into account when making judgements (Advertising Standards Authority, 2007b). The ASA is also able to ensure that advertisers abide by both the 'spirit' and the 'letter' of the Codes, whereas a legalistic system would be likely to have less flexibility (Advertising Standards Authority, 2008b). Also, because the codes of the self-regulatory system are written by the industry and media themselves, they claim to be more willing to abide by them. A government-driven system is less likely to be viewed favourably by the industry. Similarly, the industry accepts the need to comply with the self-regulatory system in order to avoid any move to a more rigidly enforced government set of legislations (Advertising Standards Authority, 2007a).

The sanctions which the ASA applies are generally successful. In 2007, the ASA received 24,192 complaints about 14,080 adverts and resolved 23,953 complaints about 14,009 adverts. While 76.9 per cent of these complaints were not investigated,16.1 per cent were formally investigated and seven per cent pursued informally. Of those formally investigated, two-thirds were upheld. (Advertising Standards Authority, 2007a) Media owners are on the whole receptive to ASA requests, and in total, 2458 adverts were changed or withdrawn following ASA action. The ASA can refer any broadcast advert which is in breach of the Code to Ofcom, and any non-broadcast advert which is deemed misleading to the OFT. In 2006, the last year for which information was available at the time of writing the ASA compliance team ensured that 388 problem adverts did not re-appear, with sanctions-such as an Ad Alert-applied on 42 occasions (Advertising Standards Authority, 2006). However, such referrals do tend to be very rare, and often the bad publicity of the ASA upholding a complaint is thought to be enough to force an advertiser to withdraw the adverts. There are cases where these sanctions do not have the desired effect however. In January 2008 the ASA upheld complaints against a Ryanair advert which showed a model in schoolgirl clothes and a headline 'hottest back to school fares'. It was deemed by the ASA that the advert was 'irresponsible' and appeared to link teenage girls with sexually provocative behaviour (Advertising Standards Authority, 2008c). Ryanair refused to withdraw the advert arguing that;

> *'…this isn't advertising regulation, it is simply censorship. This bunch of unelected self-appointed dimwits are clearly incapable of fairly and impartially ruling on advertising.'*
>
> (BBC News, 2008)

Thus Ryanair sought to reverse the bad publicity from the judgement and argued against the effectiveness of the ASA. Two points are relevant here: firstly, despite the Ryanair protestations, the media agreed not to run the advert again, which suggests that the self-regulatory system was effective; secondly, this type of reaction to a judgement is rare since, as noted earlier, the advertising industry supports the self-regulatory system and realises that any stringent opposition to the ASA may result in government regulation (Advertising Standards Authority, 2007a).

5.4.1 The regulation of TV programming

Whilst the ASA and CAP regulate advertising, Ofcom has responsibility for the regulation of programme content. It has the task of ensuring that it is unlikely to 'seriously impair the physical, mental or moral development of people under 18' (Ofcom, 2008b). Broadcasters must also protect children through programme scheduling, including abiding by the watershed and not scheduling programmes that are unsuitable for children before 2100 or after 0530 hrs. These general rules, known as Tier 1 regulation, (Ofcom, 2008c) are designed to ensure that children are not exposed to programming content which is deemed unsuitable.

Tier 2 regulation involves Ofcom setting quotas for certain types of output, including original productions, independent productions, national and international news and current affairs (Ofcom, 2008a, p194). Ofcom does not, however, set quotas limiting the amounts of repeats broadcast. CBeebies and CBBC broadcast a large proportion of repeats, with 95 per cent of programmes shown on Cbeebies being a repeat (Ofcom, 2008a, p204). However, children's and schools' programmes are designed to be repeated often, since as Ofcom states, 'as children grow up, new generations take their place and are able to watch these programmes which will be new to them' (Ofcom, 2008c, p204).

There is a commitment from BBC One and BBC Two to broadcast 1500 hours of children's programmes every year (http://www.bbc.co.uk/info/statements2008/television/bbcone.shtml). Ofcom considers whether commercial terrestrial channels include a 'suitable quantity and range of high-quality and original programmes for children and young people' but does not set quotas for the amount of children's programming broadcast (Ofcom, 2008c). For example, in response to falling advertising revenues, partly as a result of the restrictions on food advertising to children, ITV1 put forward proposals to reduce the amount of children's programmes to be broadcast in 2008 from four hours per week (plus an hour per week of children's films) to two hours per week (plus an hour per week of films). In response to Ofcom's view that such a substantial reduction the hours of children's programming was inappropriate, ITV compromised and settled on 2.5 hours per week, with a reduction in children's films but Ofcom was 'unable to take any further action' to ensure that children had access to a substantial amount of original and high-quality programming (Ofcom, 2008c).

Despite the squeeze on production in the terrestrial commercial channels, overall, with the rapid expansion of multi-channel television (detailed in Chapter 3) children have never had so much dedicated programming available to them with total broadcasting hours increasing from 20,000 in 1998 to 113,000 in 2006. The total hours of original UK children's programmes has remained stable since 1998 with the increase in hours broadcast by the BBC offsetting the decline in provision by the main commercial terrestrial channels (Ofcom, 2007a). While parents value the BBC's output, not least for the absence of advertising, questions are raised about whether it is in the audience's long-term interests to rely so heavily on the Corporation for high-quality children's programming made in the UK, as parents also value programming from 'a range of different voices' (Ofcom, 2007a).

Children are watching other channels but many of these are commercial services provided by non-UK operators. In multi-channel homes in 2006 82 per cent of children's viewing went to dedicated children's channels with only 18 per cent going to the main terrestrial channels (Ofcom,2007a). The popularity of children's channels, such as The Disney Channel and Nickelodeon, points to the increasing proportion of children's programming which originate from outside of the UK. In 2006 just 17 per cent of programmes broadcast for children were from the UK, while programming made in the UK and broadcast for the first time on a UK channel accounted for only one per cent of total hours (Ofcom, 2007a).

5.5   Age, Advertising and Marketing

When deciding whether the codes designed to protect children are broken, the ASA is necessarily involved in making judgements on what constitutes and causes harm. In making these decisions they must negotiate contending views of what is appropriate for what ages. An example of this is a 2005 advert for KFC Zinger Crunch salad which drew over 1500 complaints. It showed people speaking with their mouths full, which was claimed to encourage bad manners in children. The ASA took the view that '…teaching children not to speak with their mouths full is a continual process needing frequent reminders; this advert was unlikely to have an adverse effect on their behaviour ...'and, therefore, chose to not uphold the complaints (Advertising Standards Authority, 2005).

Expert opinion on when children start to differentiate between advertising and programming and when they are able to critically appraise advertising plays a crucial role in regulation. Research used by the industry suggests that children can begin to distinguish between adverts and programmes at around age four. By the time children reach about 12 they can understand the meaning and purpose of adverts and begin to critically appraise them (Livingstone, 2004). It is, therefore, thought that children may be vulnerable to advertising certainly up to the age of eight, perhaps even to the age of 12 (Livingstone, 2004). In line with this understanding, some scheduling restrictions apply specifically to advertising in programs aimed at children up to the age of eight (an ex-kids restriction) or those attending pre-school or primary school, particularly for HFSS food promotions (Advertising Standards Authority, 2008b).

Beyond eight years however, there is variation across agencies in who is defined as a 'child'. For example, whilst the Broadcast Committee of Advertising Practice (BCAP) and Committee of Advertising Practice codes (CAP) define children as under 16, Ofcom define children as 'people under the age of 15 years' but also issues guidance on protecting the Under-18's from harm and offence (Ofcom, 2007b). HFSS food adverts may not be shown around programmes aimed at under 16's (The BCAP, 2004a). There are also other products which cannot be advertised to under 16's, such as the lottery and others, again, such as slimming products, diet regimes, dating services and alcoholic drinks, that cannot be advertised to under 18's (Ofcom, 2007b). These national variations are compounded by international differences. In the US for example, children are defined as those under the age of 13. As a consequences websites originating in different countries operate on different assumption making global agreements on regulation difficult to achieve (Nairn and Fine, 2008).

The current HFSS restrictions on television food advertising are also problematic. At present only four out of the 20 programmes with the largest under 16 audience are covered. This is because the rules only apply to programmes watched by 20 per cent more children than the proportion of four to 16-year olds in the population as a whole but exclude general programmes such as *Emmerdale* which command numerically higher audiences among children (Which?, 2008). Thus, children are still exposed to adverts for foods which are unhealthy. It is also worth noting that the CAP Code applies rules regarding advertising food to children to all foods except fresh fruit and vegetables (The CAP, 2005). However, the BCAP rules only apply to foods which are HFSS, as determined by the Food Standards Agency's (FSA) nutrient profile (The BCAP, 2004c). It is possible, however, for there to be borderline cases. Coca-Cola for example, use top footballer Wayne Rooney to promote Coke, despite the restrictions on using celebrities who may have particular appeal to pre-school and primary school children to promote HFSS products (Which?, 2008). Coca-Cola argue, though, that Rooney has more appeal to teenagers and young adults than children (Coca-Cola Great Britain, 2008).

What does seem to be missing from much of the discussion about regulation and the framework are the views and perspectives of children themselves. While the media industry actively engages in promoting critical thinking on advertising and marketing for children[4] these efforts are not matched by the ASA. While it undertakes a customer satisfaction survey twice a year there is no sustained engagement with what children themselves know and think of the service it provides.

5.6   The Challenges to Regulation

The current regulation framework revolves heavily around traditional media such as television, radio and print media. The rapid take-up of the Internet, mobile phones, and games consoles among children poses major new challenges. For example, the ASA cannot control the advertising which appears on company websites, nor can it control whether these sites target children. Some of Nestlé's websites, for example, such as those for Nesquik and Smarties, are aimed at children through their use of games and activities (Which?, 2008). Similarly, as we saw earlier, companies are now finding new ways of marketing to children, such as branded spaces online, online games and social networking websites (Moore, 2003; Scherer, 2007; Book, 2004). None of these new promotional forms can currently be regulated by the ASA, which only has responsibility for Internet banners and pop-ups, (Advertising Standards Authority, 2002) although recent evidence suggests that digital media advertising generally complies with the existing codes (Advertising Standards Authority, 2008d). Advergames frequently breach current codes by embedding promotional content within the game without making it clear that it is advertising material and as Nairn's recent work demonstrates, other instances, while not blatantly breaching current guidelines do encourage pester power. For example:

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[4] See for example mediasmart, which is run by the ad industry to help young people critically appraise advertising http://www.mediasmart.org.uk/

'Two of the sites investigated are essentially entertaining shop fronts for children's brands: Barbie and Diddl. Both of these sites constantly offer children the opportunity to create wish lists which can be quickly and easily e-mailed to parents and other adults. Whilst technically the sites do not use the words 'tell your mum to get it'

(EU, 2006) the spirit behind the email wish list is the same (Nairn, forthcoming).

Another recent study by Garlik for example, estimated that up to three-quarters of a million children aged eight to 12 were evading the age restrictions placed on entry to social networking sites such as Facebook and Bebo (Carvel, 2008). Membership also raises major problems of privacy as more and more information on users is collected, using new tracking and data mining techniques, and deployed to target promotion more effectively. Whilst encouraging children to contribute their own creative work or promotional ideas to companies stimulates their active participation in marketing initiatives, it may raise questions about intellectual property rights. Taken together, the emerging ways of marketing to children on the Internet pose a major challenge for the self-regulatory system in the future.

One important and final point to mention is the increase in 'media stacking', discussed earlier in Chapter 3, where children are using a range of media at the same time. The growth of websites, mobile texts and TV adverts that encourage impulse buying is increasing the risk of future debt. For example, many mobile phones allow purchase using existing credit and many websites accept cards such as Solo which can be owned by an 11 year old (Nairn, forthcoming).

Even traditional forms of advertising can pose challenges for the ASA. For example it has no control over the sponsorship of sports events or sports teams and individuals. This is an area of particular relevance to marketing to children, as sport can appeal to all ages. Efforts are being made, however, to try to address some of these problems. The new Children's Web Watchdog, for example, aims to promote safe use, to teach children about web dangers, to target harmful net content, and establish a code of conduct for sites featuring material uploaded by users. It has as a core function a strategy to try and reduce the risks of Internet abuse by corporations (http://news.bbc.co.uk/1/hi/education/7638492.stm). But these issues can be difficult to address in an increasingly globalised world, where advertisers are choosing to market across national borders. Direct mailings which originate outside of the UK are outside of the ASA's jurisdiction for example.

In response, efforts are being made to establish cross border agreements. The European Advertising Standards Alliance (EASA) which is underpinned by European Union legislation on Unfair Commercial Practices brings together self-regulatory bodies from European countries. Similarly the International Chamber of Commerce (ICC) is responsible for overseeing advertising codes across the world.

As movement across borders becomes easier however, tracking advertising distributors is likely to become more challenging. It is these new challenges that the self-regulatory and co-regulatory systems of the UK need to look toward. There are examples where this has been done. For example, US Company Health Laboratories of North America sent out a misleading advert, via a Dutch fulfilment

house. Usual sanctions did not work because none of the members of the CAP, Royal Mail or the Direct Marketing Association were involved with the mailings, which were hand addressed. The company could not be referred to the Office of Fair Trading (OFT) because it was American based. The compliance team, therefore, used the SRC, the Dutch equivalent of the ASA, to apply pressure. They also advised the OFT who alerted the US Federal Trade Commission (Advertising Standards Authority, 2001).

5.7   Summary

The current regulatory framework is complex and focused primarily on established media platforms such as TV, radio and print. While the ASA has been successful in maintaining compliance in a number of areas, and monitors adverts itself, it often has to rely on complaints to monitor promotional activity. As there are often complaints to the ASA which do not fall under the CAP or BCAP Codes, it appears that the general public is still not clear on what issues the ASA can adjudicate. Within the current regulation framework there is confusion over the age banding with organisations defining childhood differently. Problems also exist in the definition of what constitutes a 'child programme' with some of the major programmes watched by the young not coming under the regulation framework for children's TV. While there is a framework for monitoring the quality and quantity of Children's TV, maintaining a diversity of original UK production in a competitive commercial environment presents major challenges. It is critical to remember that there is no regulation framework for sponsorship and given that children are avid watchers of sport this opens them to a wide range of adverts that may well not be appropriate for their age group. This is a fundamental gap in the regulation framework.

It is also important to remember that much of the regulation framework is focused on traditional media. Important developments on the internet, such as companies' own web sites, which are a major source of advergames, are not covered by current regulation. In this age of media stacking and interconnection these gaps suggest that the existing regulation framework needs to be expanded to meet challenges ahead.

6 CONCLUSION

This report has identified a number of key changes that are taking place in the lives of children and young people that are creating increased opportunities for marketing and advertising. In this final chapter we return to our key objectives and draw out the main conclusions of the report.

1 How do Children fit into the Profile of the Marketing and Advertising World?

Historically, childhood has changed and over time different age bands have emerged that redefine what it means to be a child. We start to see a fragmentation of childhood that is related to a series of social and political processes. Categories such as 'teenager', 'toddler' and 'tweenie' become popularised terms that attract the attention of the marketing and advertising industry and provide a basis for targeting media and marketing resources at specific age bands. In recent times we see a changing landscape around commercial activity. Firstly, public spaces and places which have been traditionally free from advertising and marketing start to engage with the commercial sector in a variety of ways. **Commercial decisions** begin to reshape the environments outside the home that are central to children's development. Schools and play areas for younger children are increasingly being opened to commercial activity. While the exact extent of this shift has not yet been comprehensively researched the general trend toward greater commercialisation is clear. This is further enhanced by the increased use of retail environments and theme parks as family leisure destinations. Again we see sites that attract thousands of children every year, being shaped by a variety of commercial activities so that children increasingly encounter, advertising and marketing as a taken-for-granted backdrop to activity.

Children's lives are also being dramatically changed by the new landscape of digital technology. Not only is the expansion of new media and digital technologies reshaping forms of play and social relationships it is also facilitating a shift towards more integrated forms of promotion. In this context, not only is marketing and advertising enjoying increasing opportunities to expand the number of **commercial messages** aimed at children it is increasingly incorporating them into popular cultural forms, such as games, rather than clearly demarcating them as advertising. It is also able to connect with children's everyday talk and relations with friends as they are co-opted to act as 'brand ambassadors'.

Taking these two developments together, we can start to see that marketing and advertising is becoming both **ubiquitous** in children's lives and **normalised**.

2 What Mechanisms and Strategies do the Marketing and Advertising Industries use to Target Children?

Many of the strategies and techniques used by the Marketing and Advertising Industries, such as product placement, have a long history. We see the continuity and expansion of these approaches in contemporary times with new media creating new ways of using them. But we also see new mechanisms emerging that are unique to the ways that digital technologies have been developing with the

expansion of new media in children's lives creating new opportunities for marketers and advertises to engage them as possible *present* and *future* consumers. We also start to see the emergence of stealth marketing or covert advertising techniques such as viral marketing.

Marketers are also finding new ways of working with schools, and with pupils and of targeting particular groups of children and young people, especially some of those who were traditionally hard to reach, through computer games and sport sponsorship.

We suggest that various shifts are constructing a marketing environment that is becoming more:

- **Integrated** with advertising and commercial promotion being incorporated into favourite films, television programmes, games, web sites and events rather than being clearly marked and separated off.
- **Personalised** through access mediated by computers, television sets and home computers children and young people control themselves, rather than share with other family members.
- **Convergent,** with campaigns combining activities across a number of different sites or 'platforms'.
- **Involving**, inviting children and young people to actively contribute to developing campaigns and selling products to their peers.

3 How are the Marketing and Advertising Industries Regulated, what Gaps Exist and what Issues does it Raise?

The industry regulates itself through a range of agencies, from industry-based organisations (such as the Portman group), up to the CAP and ASA. A system of co-regulation exists between Ofcom and the ASA for broadcasting advertising. The industry accepts self regulation in order to avoid more government regulation or legislation. Much current regulation is focused on the traditional advertising platforms of television, radio and print media, although the ASA now has jurisdiction over texts and display advertising on the Internet.

Gaps and weaknesses in the present infrastructure exist. Not only is the system complex and confusing to most lay consumers, but many of the newer ways of targeting children and young people, such as company websites, sports sponsorship, advergames, in-game advertising, blogging, and virals, fall outside the ASA's current remit. As much as the ASA and CAP tries to ensure that children view suitable adverts, it is not always possible for them to prevent children seeing adverts which may not be appropriate, especially if children have unsupervised access to new media, or are watching programmes which are not covered by regulations (e.g. sports). The challenge ahead for regulation is therefore to:

- **Bring key emerging areas** that children and young people engage with- notably companies' own websites and sports sponsorship-**into the regulatory framework.**
- **Move beyond segmented thinking**. The current regulatory system has its origins in an analogue media world where each industry had its own separate

characteristics. It has not yet fully adapted to a digital world characterised by increasing convergence between media and is not fully able to respond to the emergence of multi-platform promotional initiatives. Technological developments are consistently running ahead of regulatory responses.

- **Tackle globalisation** of media, particularly the Internet. This poses major problems for the development of comprehensive and effective regulation. International agreements are essential.
- **Move beyond media**. While effective media regulation is necessary it is not sufficient. Policy in this area also needs to take account of the other sites of marketing and promotion to children and young people, particularly commercial activity associated with schools and play spaces, and event sponsorship. There is an urgent need for joined-up thinking and policy.

Concluding remarks

The developments identified in this report require us to ask major questions about the society we want to build for the future. Firstly, how are we going to manage the **Digital Dynamics.** The last half decade have seen major innovations in digital media that have opened up a range of new opportunities for marketing and promotion. This process will continue and may well accelerate. Deciding how much freedom to grant commercial interests within this emerging space and how best to use these technologies to enable public cultural institutions-libraries, museums, universities, public broadcasting-to develop and extend advertising free services to children which help them to develop as citizens are both issues requiring urgent attention.

Also, with the expansion and growth of new digital media and the development of movement between and across media platforms it is clear that a balance will need to be found between **Choice and Regulation.** Children can now watch a wide range of television programmes and also access and communicate with others across the globe. They are growing up in an environment that has the potential to be creative, educational and allow them to 'push boundaries' and drive technological change and developments. Yet, as we have seen, these new developments also create opportunities for commercial companies to use this technology to their advantage. The question then for regulation is how best to allow children to take advantage of this expanded choice while also protecting them from harm and offence. Children now have more unsupervised time using new media, all of which is becoming increasingly commercialised, therefore it is important that regulation takes account of these developments in technology while at the same time ensuring that children's choice is not seriously curtailed.

Finally, **what is the Future of Citizenship.** Today's children and young people are growing up in a cultural environment which is becoming more saturated with promotional messages than ever before. They are persistently encouraged to think of themselves as consumers. We need to ask whether this has consequences for education in citizenship, designed to encourage a rising generation to think of themselves as members of a moral and political community and to see their future as inextricably linked to the quality of public life.

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