

# Bailey Review on the Commercialisation and Sexualisation of Childhood (Industry and Wider Stakeholder Version)

## Consultation Response Form

The closing date for this consultation is: 18 March  
2011

Your comments must reach us by that date.

Department for  
**Education**

**THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online response facility available on the Department for Education e-consultation website (<http://www.education.gov.uk/consultations>).**

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If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

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The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

**Please tick if you want us to keep your response confidential.**

Reason for confidentiality:

Name	Lucinda Fell
Organisation (if applicable)	Childnet International
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If your enquiry is related to the policy content of the call for evidence you can telephone: 0370 000 2288 or e-mail: [bailey.review@education.gsi.gov.uk](mailto:bailey.review@education.gsi.gov.uk)

If you have a query relating to the consultation process you can contact the Consultation Unit by telephone: 0370 000 2288 or e-mail: [consultation.unit@education.gsi.gov.uk](mailto:consultation.unit@education.gsi.gov.uk)

Please select ONE box that best describes you as a respondent:

**PLEASE NOTE, IF YOU ARE RESPONDING AS A PARENT, THERE IS A SEPARATE CALL FOR EVIDENCE. YOU CAN ACCESS THIS FROM THE DEPARTMENT'S e-CONSULTATION WEBSITE:**

**<http://www.education.gov.uk/consultations/>**

<input type="checkbox"/> Manufacturer	<input type="checkbox"/> Retailer	<input type="checkbox"/> Broadcaster
<input type="checkbox"/> Internet/Telecoms Provider	<input type="checkbox"/> Advertising/Marketing Company	<input type="checkbox"/> Industry Regulator/Body
<input type="checkbox"/> Professional/Trade Association	<input type="checkbox"/> Parenting Organisation	<input checked="" type="checkbox"/> Children and Young People's Organisation
<input type="checkbox"/> Education Sector	<input type="checkbox"/> Government Sector	<input type="checkbox"/> Other (please specify)

Childnet International is a UK-based charity working domestically and internationally to help make the Internet a great and safe place for children and young people, alongside enabling them to use interactive technologies safely and responsibly.

Childnet focuses on education, awareness and policy. Alongside promoting the opportunities that the Internet and new technologies offer, Childnet is active in carrying out research and engaging in key policy fora alongside the Internet industry and government.

Since January 2011 Childnet has been one of the partners in the UK's new Safer Internet Centre and forms the Awareness Centre within this, focussing on raising awareness amongst parents, carers, teachers, children and young people in staying safe online, and achieving this in a number of ways, including through working with stakeholders, developing resources and organising Safer Internet Day in the UK.

## SECTION 1: FOR INDUSTRY STAKEHOLDERS ONLY

### Questions about your business or industry

1 To what extent do you think parents are concerned about how your business, and your industry more widely, impacts on children and young people?

Comments:

We know from our experience of working in schools and with children and young people that they are affected by sexual and commercial content online. We also know that there are parental concerns in this area.

The internet and the new technologies which can access it have become embedded in children and young people's lives. Research tells us that children and young people (9-16 year-olds) spend on average 102 minutes per day, (see p7.

[www2.lse.ac.uk/media@lse/research/EUKidsOnline/EUKidsII%20\(2009-11\)/ParticipatingCountries/UKReport.pdf](http://www2.lse.ac.uk/media@lse/research/EUKidsOnline/EUKidsII%20(2009-11)/ParticipatingCountries/UKReport.pdf)), which is higher than the European average. This time is spent on a range of activities, also recorded in the EU Kids Online II survey, with school work, gaming, social networking and watching video clips as the most popular.

Ofcom's 2010 children's media literacy audit revealed that 93% of 9-16 year olds questioned went online at least weekly, with 60% going online everyday or almost every day. It is significant, particularly in the context of the role of the parent in supervision, that 57% of the children in the EU Kids Online II survey in the UK access the internet in their bedroom or a private room), and also half access the internet through a mobile device.

Professor Tanya Byron, author of the Byron Review flagged up parental concern in 2008. "When talking to parents I have found that their top digital safety concern is easy access to pornography and inappropriate adult content. Accidental or involuntary exposure to pornography can be disturbing for a child and the viewing of pornography by children and young people has been associated with the reinforcement of sexist or violent attitudes and behaviours." (*Do we have safer children in a digital world? A review of progress since the 2008 Byron Review*)

Pornography remains a concern for parents today, and yet there is a disparity with parental knowledge on the other types of content that their children and young people may be accessing online. For example, many parents may be aware that depending on their child's age and stage there is sexually inappropriate content online that they may be able to access. However, this type of content may also be present in online games, but although many of

these are clearly rated, Childnet see that more work needs to be done to encourage parents and carers to be aware of and respect the ratings on many games. It is important that we make it clear to parents that the ratings are not difficulty ratings, but are age ratings.

We also know that the Internet is a highly commercial environment, both for marketing activities and advertising, and for buying and selling. In 2007 Childnet co-authored the 'fair game?' (<http://www.childnet.com/downloads/fair-game-final.pdf>) report with the National Consumer Council (now Consumer Focus) assessing commercial activity on children's favourite websites and online environments.

The 'fair game?' report investigated 40 sites regularly used by children and young people. It found that 95% of these sites had some sort of commercial activity on them including various forms of marketing and paid-for advertising to the sale of goods and services. The report looked at the nature of this commercialism on these sites, and considered issues around the clarity of information, the age appropriateness of the commercialism and privacy.

Children and young people spending time online can potentially be exposed to advertising and advertisements for a great length of time, greater than for other forms of media where the time exposure is limited. In our study, we found the children and young people considered some advertising to be an obstacle to their online experience, and they found pop ups particularly intrusive (and some were concerned by these, fearing computer problems and getting into trouble with parents). We also found that young people had developed strategies for navigating this environment, by just ignoring the ads, or identifying advertising as advertising on the basis that it moved.

The 'fair game?' report found that children found some forms of advertising difficult to recognise with almost a quarter of adverts considered integrated into content pages rather than being on a separate part of the web page. The study also found that techniques are often employed online in the form of advertisements and commercial messages that cannot be easily identified by children. Furthermore, a quarter of the adverts considered on sites that were popular with children and young people were for services prohibited for children under 16 in the UK, including gambling and dating.

These findings still hold true, but we also know that the advent of new technologies has created new commercial concerns and education is vitally important in this area, particularly with the increase of internet access through mobile phones which often occurs away from parental supervision.

*"I tell you what does disturb me and that's the internet on the mobile phones. Yeah, because you really haven't got a clue and that's open to everything. I look at the internet on my mobile phone just 'cos it was like a novelty and its all*

*like [advertising] hot babes and girls girls girls stuff. Loads of sex stuff.”*  
(Mothers of 11 – 16 year olds questioned as part of the ‘fair game’? report)

Much of the Internet’s business model is based upon advertising. Our organisation recognises that we need to equip children and young people with this understanding as well as the skills to navigate this commercial environment.

2 If you think that parents are concerned, what do you think their key concerns are in respect of your business and industry?

Comments:

We know that commercial content on websites, when ranked against the other internet risks for children, is not a top priority for parents, and rather they focus on other areas of safety online such as bullying and the potential for grooming by paedophiles (supported by Professor Byron’s observations noted in response to question 1).

Although commercialism is not a top priority for parents, given the extent of exposure to commercial activity we see that it is vital to give parents, children and young people the tools to deal with commercial pressures online as part of our approach to help them navigate the internet safely.

3 How does your business and/or industry seek to understand further parents’ concerns? Please give specific examples of work you have done, or are doing, in this area.

Comments:

We regularly work with parents in our work in schools, listening and responding to their concerns.

We seek to address concerns in our parent's presentation, introducing areas of risk, but providing parents with tips, tools and strategies to help make the internet safer for their children and young people.

Childnet has created a number of resources for parents to address their concerns including the Know IT All for Parents CD Rom resource, distributed to over 2 million parents in the UK since 2007. ([www.childnet.com/kia/parents/CD/](http://www.childnet.com/kia/parents/CD/)).

Additionally, our policy work is shaped and informed by the work that we do in schools, including work with parents, but also work with educators and school staff as well as children and young people.

The 'fair game?' research, see <http://www.childnet.com/downloads/fair-game-final.pdf>, captured in qualitative research, the views of parents and carers (as well as children and young people) on online commercialism and their experiences and perceptions of this.

4 Currently, how does your business and/or industry respond to the concerns of parents, children and young people? Please provide specific examples where possible.

Comments:

We recognise at Childnet that there is a need to inform and educate parents on all aspects of the safe and responsible use of the internet by children, and we have been working running parents seminars, school visits, and participating in policy fora, such as the UK Council for Child Internet Safety.

Furthermore, we place the real-life concerns that we hear from users of the internet, including parents, children, young people at the heart of our work. Their voice is included in our policy work, and it is their experiences that we address in our range of resources providing clear information and positive tips to empower parents to support their children and young people in engaging with the online environment.

As the Safer Internet Centre, we work to engage with stakeholders to help work together to support opportunities like Safer Internet Day, and have a greater impact on the audiences – see [www.saferinternet.org.uk](http://www.saferinternet.org.uk).

We also work with stakeholders on specific projects. One such example, which is relevant to the commercialism discussion, is the assistance we gave to ICSTIS, now PhonePayPlus, in the development of their Phone Brain website, see [www.phonebrain.org.uk](http://www.phonebrain.org.uk), a site where young people can find out about premium rate services.

5 Is there more that either your business or your industry more widely could do to respond to the concerns of parents, children and young people in relation to your industry?

Comments:

6 Is there more that anyone else (Government, other industry groups, regulators, educators, parents etc) could do to respond to parental concerns in relation to your industry?

Comments:

7 Do you have any examples of good practice in terms of how your business and/or industry is responding to the concerns of parents and children? Please give details.

Comments:

Childnet carry out a range of activities, including school visits where we talk to children, parents and carers, and school staff, and we also develop resources for these audiences.

Childnet's award-winning Know IT All for Parents ([www.childnet.com/kia/parents](http://www.childnet.com/kia/parents)) resource is a good example of how we have responded to the concerns of parents seeking to equip with the knowledge they need to empower their children in their online engagement.

Know IT All for Parents (KIAfP) is an interactive, innovative and up-to-date resource available in different formats and languages, designed to empower varied user groups in understanding how the Internet works and how it can be used positively.

KIAfP was originally commissioned by the Department for Education and Skills as part of the 'computers for pupils' initiative which aimed to make a positive difference in helping to overcome the digital divide and to give pupils from socially disadvantaged homes the same opportunities as their peers. Since that point Childnet has further developed the resource so that it now provides key information for both primary and secondary age groups as well as for parents, and includes content in several languages, and has been made available with

support from Becta and the UK Council for Child Internet Safety.

In developing KIAfP, Childnet recognised the different and varied end users and their different learning styles. The resource offers a variety of means of accessing e-safety information allowing users to access the information in the way most meaningful to them. The resource enables user flexibility and KIAfP can be viewed by parents but also shown to children and young people to educate them and encourage dialogue on key areas of internet safety. This can act to encourage continued engagement on key internet-safety topics which may have been introduced in the school setting but which can be followed up at home. For example, primary age children are able to listen to a talk from a primary age presenter about the SMART rules and the internet applications of direct relevance to them.

The resource gives clear guidance how potentially abusive material can be reported and who it should be reported to, highlighting the 'Think you know' website, as well as sign-posting other resources for parents and giving advice on reporting other online incidences such as cyberbullying.

Know IT All for Parents is practical and accessible and addresses the fear that many parents have of the Internet (lack of knowledge) and the anxiety many face about the risks to their children (internet safety). It does this in a balanced, educative and positive "tone" with the overriding message that parents can indeed "Know IT All".

In producing KIA, Childnet consulted with a range of parents who highlighted the need for Internet Safety material in their primary language. For this reason KIA uses video and interactive elements, contains a New to Computers section, a whole area about the positive and safe ways in which the Internet can be used to help with everyday life (including a child's education) and is available in 8 different languages as well as English and British Sign Language, namely Welsh, Punjabi, Gujarati, Arabic, Polish, Mandarin, Urdu, and Bengali.

As well as being an integral part of the Home Access programme – it was pre-installed on all the hardware on offer – over 2 million copies of this resource has been requested and sent out.

## **SECTION 2: FOR ALL STAKEHOLDERS**

### **General**

8 a) The following factors are sometimes said to put pressure on children to grow up too quickly. Which factors do you think have the most influence on children, if any? (tick all that apply)

<input type="checkbox"/> Sexual images (e.g. TV, films and advertising)	<input type="checkbox"/> Advertising and marketing aimed at children	<input type="checkbox"/> Peer pressure
<input type="checkbox"/> Seeing inappropriate things on the internet	<input type="checkbox"/> The things that celebrities like pop stars and actors do	<input type="checkbox"/> Other (please specify)
<input type="checkbox"/> None of these		

Comments:

**Gender**

8 b) Do you think these pressures...

<input type="checkbox"/> Affect boys and girls equally?	<input type="checkbox"/> Affect girls more?	<input type="checkbox"/> Affect boys more?
<input type="checkbox"/> None of these		

Comments:

### Corporate Social Responsibility

9 In general, do you think that businesses (e.g. retailers, manufacturers, broadcasters, advertisers, internet providers etc.) are responsive to and responsible with regard to the concerns of parents and children? Please give examples.

Yes

No

Not Sure

Comments:

There has been a lot of work by service providers to provide parents with tools to help protect children. These include parental controls, often provided free with products and services such as games consoles, mobile phones, i-player and similar services, and even web browsers. Service providers are also making available safety advice for parents.

A range of different activities are important to raise awareness about protecting children online and the safe and responsible use of technology and the tools available for this. There are opportunities to do this, at point of sale, in store, at timely moments such as these, and also in other ways. At Childnet, as well as developing resources for parents and children for themselves and others to use, we run seminars for parents in schools and in the workplace, and we know parents value the face-to-face contact in addition to this, to help get these messages across, including making awareness of the tools provided by service providers. We receive some support for this work, but we would encourage more support for this kind of work. Reaching parents via schools is also, as research tells us, the desired route for parents to receive information about internet safety (see EU Kids Online II, [http://www2.lse.ac.uk/media@lse/research/EUKidsOnline/EUKidsII%20\(2009-11\)/ParticipatingCountries/UKReport.pdf](http://www2.lse.ac.uk/media@lse/research/EUKidsOnline/EUKidsII%20(2009-11)/ParticipatingCountries/UKReport.pdf)).

### Public Space - Physical Environment

10 Thinking about the public space (streets, public transport, shopping and leisure areas), do you think that children are exposed inappropriately to things of a too commercial or sexual nature? If you answered yes, please explain why giving specific examples where possible.

Yes

No

Not Sure

Comments:

On sexualisation, parents and carers are concerned to protect their children from exposure to inappropriate content, and pornographic content is the concern here. A recent study by Sonia Livingstone at the LSE found that 24% of 9-16 year olds in the UK had seen sexual images, but 11% had seen them online (p26-27, [http://www2.lse.ac.uk/media@lse/research/EUKidsOnline/EUKidsII%20\(2009-11\)/ParticipatingCountries/UKReport.pdf](http://www2.lse.ac.uk/media@lse/research/EUKidsOnline/EUKidsII%20(2009-11)/ParticipatingCountries/UKReport.pdf)).

This makes the point that the internet is not the only source that we need to be looking at here, but it also makes the point that it is nearly the route for half of such exposure. An earlier LSE study, UK Children go online, found that over half of children that had come across pornographic content online had done so accidentally. One can imagine that accidental exposure to such content could be likely to have a potentially higher impact, and likely again to be higher for younger children. And the more recent EU Kids Online study looked at the harm of exposure to such content. 19% of those children who had seen such content were bothered by it (p33, [http://www2.lse.ac.uk/media@lse/research/EUKidsOnline/EUKidsII%20\(2009-11\)/ParticipatingCountries/UKReport.pdf](http://www2.lse.ac.uk/media@lse/research/EUKidsOnline/EUKidsII%20(2009-11)/ParticipatingCountries/UKReport.pdf)) and younger children (11-12 year-olds) were more likely to be bothered by this. This is still a significant number of children, given the number of children online, and given the trend of more younger children with access to internet technology, there is a clear policy need to reduce the likelihood of this exposure.

### Public Space - Virtual Environment

11 Thinking about broadcasting and the internet, do you think that current measures to protect children from exposure to inappropriately commercialised or sexualised content and advertising are effective and sufficient? If no, please give specific examples of where you think there are weaknesses.

Yes No Not Sure

Comments:

The move towards a more portable technology to access the net, with smart phones, laptops, mobile devices pose serious challenges here for parental supervision. The Mobile Operators in the UK provide free of charge filtering for mobile phones for internet access going through their networks. This level of protection is being challenged by the advent of phones that can access wireless networks, and bypass the MOs network, and there needs to be some work done to maintain the effectiveness of this response to protecting children from inappropriate content.

Filtering software can help to block inappropriate material and is an important tool to help keep children safe online. It is important for parents and carers to be aware of these tools, which are often provided free of charge by their service providers, but it is equally important to be aware that filters are not always 100% effective and aren't a substitute for parental involvement. It is important for parents to know that these tools are there to help them, but at the same time we would encourage them to be familiar with internet-safety tips and the types of sites their children are using, so they can empower them to deal with inappropriate content if they do come across it.

The EU Kids Online II study found in the UK found that 46% of parents “block or filter websites”

([http://www2.lse.ac.uk/media@lse/research/EUKidsOnline/EUKidsII%20\(2009-11\)/ParticipatingCountries/UKReport.pdf](http://www2.lse.ac.uk/media@lse/research/EUKidsOnline/EUKidsII%20(2009-11)/ParticipatingCountries/UKReport.pdf)), a much higher average percentage than in Europe generally. Despite this comparatively higher figure for the UK, in our work with parents we recognise either some obstacles to either parents being aware of filtering and parental control tools and their availability, (sometimes even the need for such tools as there is a lack of awareness that some products include internet capability) or a need for encouragement/inducement to apply them or to keep them applied. There are a range of tools offered, many are free, but there is work to be done to help make parents aware that for example there are parental controls available.

### **Clothing and Products**

12 Thinking about the retail sector, do you think clothing and products for children are sufficiently age-appropriate and gender-appropriate (including non-gendered)? If not, please provide specific examples.

 Yes No Not Sure

Comments:

### Children as Consumers

13 Parents and children sometimes report that they feel under pressure to buy things they would prefer not to. Who do you think should be responsible for helping parents and children deal with such pressures? (tick as many as apply)

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> Manufacturers          | <input type="checkbox"/> Retailers          | <input type="checkbox"/> Government             |
| <input type="checkbox"/> Regulators             | <input type="checkbox"/> Advertisers        | <input type="checkbox"/> Marketing Companies    |
| <input type="checkbox"/> Broadcasters           | <input type="checkbox"/> Internet Providers | <input type="checkbox"/> Educators              |
| <input type="checkbox"/> Consumer Organisations | <input type="checkbox"/> Parents            | <input type="checkbox"/> Other (please specify) |

Comments:

14 Companies use a range of marketing and advertising techniques when promoting products towards children. Are there any you think are inappropriate for children? If yes, please provide details.

Yes

No

Not Sure

Comments:

It is important to note, and this was found in the 'fair game?' report ( p33, <http://www.childnet-int.org/downloads/fair-game-final.pdf>), that some own-brand websites encourage children to use 'pester power' by creating wish lists that can be emailed to friends and family. This is not seen as good practice.

### Consumer Voice

15 Do you think that complaints processes for parents to raise concerns about inappropriately commercialised or sexualised products/images/material are sufficiently accessible? If no, please give details of what could be improved and by whom.

Yes

No

Not Sure

Comments:

There is a Code managed by the ASA, and a procedure for making complaints, and this covers children and online advertising, including the issues discussed in this consultation, and this has recently been extended to cover more forms of online marketing which is much welcomed, and included the recommendations made in the 'fair game?' report (p3) in 2007.

It would be valuable to hear how effective this has been, and the proportion of complaints the ASA receives about online marketing, and the level of awareness amongst parents and children about what these rules are and where and how to make a complaint. It would be worthwhile ascertaining the proportion of complaints about online advertising that are made about UK

originating sites, and how many complaints are made about sites outside of the ASA's jurisdiction. The ASA does have cross national cooperation with other bodies, and it would be useful to be aware of the effectiveness of this to help to increase confidence in this complaints procedure.

### **General Comments**

16 Is there anything else you want to say about the commercialisation and sexualisation of childhood?

Comments:

17 Finally, please let us have your views on responding to this call for evidence (e.g. the number and type of questions, was it easy to find, understand, complete etc.)

Comments:

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

**Please acknowledge this reply**

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

Yes

No

All DfE public consultations are required to conform to the following criteria within the Government Code of Practice on Consultation:

Criterion 1: Formal consultation should take place at a stage when there is scope to influence the policy outcome.

Criterion 2: Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.

Criterion 3: Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.

Criterion 4: Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.

Criterion 5: Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.

Criterion 6: Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.

Criterion 7: Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

If you have any comments on how DfE consultations are conducted, please contact Donna Harrison, DfE Consultation Co-ordinator, tel: 01928 738212 / email: [donna.harrison@education.gsi.gov.uk](mailto:donna.harrison@education.gsi.gov.uk)

**Thank you for taking time to respond to this consultation.**

Completed questionnaires and other responses should be sent to the address shown below by 18 March 2011

Send by post to: Reg Bailey, Review of Commercialisation and Sexualisation of Childhood, Department for Education, Ground Floor, Sanctuary Buildings, 20 Great Smith Street, London SW1P 3BT

Send by e-mail to: [bailey.review@education.gsi.gov.uk](mailto:bailey.review@education.gsi.gov.uk)