

Online food and drink marketing to children

CAP's response to the 2014 literature review by Family Kids & Youth

February 2015



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About CAP

The Committees of Advertising Practice (CAP) write and maintain the UK Advertising Codes, which are administered by the Advertising Standards Authority.

Membership of the Committees comprises representatives from the advertising and media industries. To ensure compliance with the rules, we also offer the industry authoritative advice and guidance on how to create ads that comply with the rules.

The Advertising Codes and related advice and guidance can be accessed at www.cap.org.uk.

Background to the review

Protecting children is at the heart of our work. At CAP we do this by creating rules that apply across media and are based on the best available evidence of advertising's impact.

The debates about food advertising to children, or more specifically ads for less healthy products, are inextricably linked with wider societal concerns about childhood obesity. As such, various campaign groups and health bodies are actively calling for tighter restrictions around this type of advertising, believing it to have a negative impact on children's health.

As the body that writes the food and soft drink advertising rules, it's our responsibility to make sure we maintain a balanced approach in line with better regulation principles. This means basing our rules and guidance on evidence. It also means recognising the role advertising plays in the obesity debate, relative to other prominent factors such as parental or guardian choices and physical exercise. By taking this balanced approach, we guard against ineffective regulation that might nonetheless have unintended consequences, including for the media we read, watch and listen to.

Like advertising in other media such as billboards, magazines and newspapers, food and soft drink marketing online is subject to strictly enforced rules designed to ensure that ads don't encourage irresponsible consumption or poor nutritional habits. Ads that directly encourage children to buy a product or encourage peer power are banned, as are promotional offers and the use of licensed characters targeting younger children. Since 2011 these rules have applied to ads appearing on company websites and in social media¹.

Nonetheless, online advertising of food and soft drink is one area where concerns about the impact of advertising on children are most keenly voiced.

Consequently, and in line with our commitment to evidence-based regulation, in 2014 we commissioned an academic review of the latest literature on children, young people and online marketing communications for food and soft drinks.

We commissioned the review – which has been published alongside this statement - to gain an up-to-date picture of the evidence and to help us answer questions such as:

- Is there a causal link between online food and soft drink advertising and consumption?
- Does exposure to online marketing increase the likelihood of becoming overweight or obese?

¹ The full rules can be viewed at www.cap.org.uk.

- How do children interact and respond to online marketing of food and soft drink products (e.g. via ‘advergames’), compared to ads in more ‘traditional’ media?

Summary of findings

The literature provides us with important insights into the questions posed above. It confirms the need for proportionate and robust advertising rules for online food and soft drink ads. Taking into account our approach to regulation outlined above, it also tells us that the rules that currently apply to those ads are in the right place.

However, the findings demonstrate why it’s important that we keep an active watch over the online space, where the pace of innovation is rapid. Whilst there was an absence of evidence to suggest that there is a problem with the rules that apply to food and drink ads online, the literature also raised important, wider questions about the ease with which children can recognise the commercial intent of online advertising, and not just for food and soft drinks.

We believe this issue – of children’s critical understanding of ads in the online world – highlighted by the literature requires action to ensure that our rules and guidance continue to meet the challenges of the online space.

Our full response and next steps are detailed below.

The literature review – key findings

Background

In 2014 we commissioned the independent research consultancy Family Kids & Youth to carry out a review of academic and other literature relating to online marketing of food and drinks to children. Our goal was to understand better the underlying evidence about the scope and impact of this marketing, to help us determine whether the existing advertising rules and guidance remain appropriate given our commitment to protect children from harm.

The review highlighted key findings in three areas: the impact of online food and soft drink advertising on children; the potential moderating effects of media literacy and; concerns over children's potential lack of critical understanding of immersive marketing content.

1. The impact of advertising on children

The review found that the extent and quality of the evidence base around the impact of online food and soft drink marketing to children is limited.

A significant proportion of the available evidence is based on content analysis which measures the number and types of online content. The studies identified show that products considered to be less healthy are being advertised through online channels, including social networks and mobile apps. There are, consequently, concerns that children might now be being exposed to more advertising for less healthy products.

Whilst this type of analysis provides useful contextual insights, it reveals little about how much of this advertising is actually seen by children, and says nothing about the impact of that exposure on behaviour or consumption levels.

Some studies suggest online marketing can influence children's brand awareness and their short-term food preferences. There are indications that advergames have this effect, making children more likely to choose an advertised unhealthy snack over a healthier alternative directly after playing a game. By contrast, similar studies with advergames for healthy eating provided inconclusive results.

The literature, however, urges caution about the confidence with which these advergame results can be translated to the real world. This is because they arise from lab-based research and not 'real world' environments, the latter taking into account children's wider behaviour online and moderating influences such as the role of parents. As Professor David Buckingham says, "an expressed preference for 'unhealthy' foods – let alone things like brand recognition or brand preference – among children cannot on its own be taken to result in (or be equated with) obesity".

Moreover, studies have tended to rely on children's self-reporting of product requests, rather than parental interviews or, crucially, longer-term monitoring of a child's actual preferences and consumption. There is an over-arching need for more and better evidence, including more long-term ethnographic and longitudinal research on the actual impact of online advertising on children's diets.

2. Debates over media literacy

Although the evidence is inconclusive, it suggests that children who, as a group, have largely grown up with online environments could have a greater understanding of online

marketing content, which might help to mitigate potential harms. The review highlighted industry initiatives, like Media Smart, that are already working to improve media literacy.

3. Questions over children's critical understanding

Notwithstanding the effects of media literacy, other studies indicate that children's mature understanding of the persuasive intent behind online marketing develops later than with traditional forms of advertising. This may be because the integrated nature of online marketing makes it more difficult for children to recognise persuasive intent, or may distract children from applying their critical faculties.

Other concerns were expressed in grey literature (e.g. press articles and opinion pieces, as opposed to qualitative or quantitative research) about the extent of children's understanding of targeted advertising and data collection.

Conclusion

Online marketing is currently subject to a broad range of restrictions designed to safeguard children against potential harms. Advergames, websites and social media are governed by the same rules on food and soft drink ads that have applied to non-broadcast media for many years. Both the broadcast and non-broadcast rules were significantly tightened in 2007 and have been kept under constant review.

The question for CAP today is whether our rules and guidance remain in the right place in light of the latest evidence and mindful both of our commitment to proportionate, effective regulation and the risk of unintended consequences.

On the concerns expressed in the grey literature around targeted advertising and data collection, in 2013 CAP introduced rules to ensure that online behavioural advertising (OBA) - a form of targeted advertising - was not targeted at children aged under 12. As highlighted by the review, our rules implement a pan-European, industry-wide initiative created to give consumers notification and choice over receiving OBA, for example via the 'Your Online Choices' website (supported by the internet advertising industry). We will continue to support advertisers to understand and follow our OBA and wider data collection rules, particularly in relation to children.

On the rules and guidance that apply specifically to food and soft drink advertising online, we are confident, based on the evidence and in accordance with our commitment to proportionate regulation, that the rules currently in place (and summarised above in the 'background' section of this document) are providing the right level of protection.

But this does not mean that no further action is required.

The issue of children's critical understanding of the persuasive intent of online ads is an area that we believe requires attention; and not just in relation to ads for food or soft drinks. We need to understand better how immersive online environments affect children's critical understanding of advertising, and ensure that the ads seen by children are obviously identifiable as such.

In response to these findings, we will carry out a number of initiatives to ensure that the advertising rules continue to provide effective protection for children online.

Next steps

The table below details the various initiatives that CAP will be undertaking in response to the findings of the literature review.

These focus on ensuring that children understand the commercial intent of online marketing – a key principle of the Advertising Codes. We will also be undertaking work to monitor online food advertising to ensure the rules are being followed, and will provide further advice and training for advertisers on the responsible use of targeted ads.

Issue	Action	Detail
Critical understanding of immersive online environments (e.g. advergames)	New guidance	<p>CAP will explore children’s critical understanding of commercial intent and recognition of marketing and will produce guidance for advertisers by Q3 2015.</p> <p>This guidance will be informed by separate work that will identify the various types, and prevalence, of immersive online marketing approaches.</p>
	Interim advice to marketers	<p>Prior to the new guidance being issued, if there is any doubt as to whether an online ad (e.g. an advergame) is recognisable to children as advertising, the marketing nature of the advergame should be made clear, for example, by labelling.</p> <p>This interim guidance will be published shortly via our Insight newsletter (which reaches over 12,500 advertisers) and included in our AdviceOnline database. Marketers affected are advised to consult this advice or the CAP Copy Advice service.</p>
	Training	<p>CAP will conduct focused industry training on the new guidance following its publication (by Q4 2015).</p>
Effectiveness of the present rules	Monitoring survey	<p>CAP will conduct a monitoring sweep of online food and soft drink marketing to check compliance with the rules.</p>
Targeted advertising	Industry advice	<p>CAP will provide further advice and training resources to the industry to reaffirm its understanding and compliance with the OBA rules that prohibit targeting children under 12 years of age.</p>

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