Call for evidence: Video-sharing platform regulation

24 September 2020

We welcome the expansion of the AVMSD's scope to include Video-Sharing Platforms, in particular the requirement to protect children from harmful content and data collection practices. We further support the decision—in respect of advertising—to appoint Ofcom and the ASA as co-regulators. The ASA and the CAP have been effective in developing and enforcing rules that underpin a safe, age-appropriate and commercially viable environment for kids' content funded by advertising.

In fact, we believe that the CAP's 2017 advertising guidance on the Recognition of Marketing Communication[1]—to which we contributed views and evidence—has been effective in improving the recognisability of advertising aimed at young people, and can, in our view, serve as a practical roadmap for the AVMSD as well.

For the current consultation, we submit below evidence related to our work in two specific areas that have proven challenging in relation to children—**influencer marketing** and **content moderation**. In addition, we're happy to share some primary research with children on the **recognisability of advertising**, and their attitudes to certain VSPs.

As SuperAwesome, we have extensive experience developing technology solutions to enable a safer internet for kids and compliant engagement for content developers and brands. We would like to share with Ofcom some guiding practical principles that may be of use as it fleshes out its own guidance:

1. **Content determines the audience**. In the absence of a universal, privacy-compliant method of identifying children online, the only viable proxy is to consider all viewers of kids' content to be children. Whilst subjective and not always easy to define, it remains the only proven effective method to determine when kids' safety rules should apply. Content owners know who their intended audience is and should be held to account, as per the Age Appropriate Design Code.

2. **Platforms own the tools**. Whilst VSPs may have limited responsibility for the content itself, they must provide content owners with easy-to-use tools to ensure compliance with the AVMSD and other rules to protect children, including mechanisms for content tagging and moderation; self-reporting; switching off the collection of personal data, including persistent identifiers; and enabling ad labels and/or privacy notices as appropriate.

SuperAwesome Background

SuperAwesome is the leading provider of kidtech, technology and services used by companies worldwide to enable safe, compliant (COPPA, GDPR) digital engagement with

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[1] https://www.asa.org.uk/resource/recognition-of-advertising-online-marketing-to-children-under-12.html

children. Over 300 of the world's biggest kids companies use our technology across industries including toy, film, entertainment and video games. From our London headquarters, our team of 200 employees (a larger dedicated kidtech team than any other major technology platform) are developing and rolling out Privacy by Design technology focused on the needs of the childrens' digital media ecosystem worldwide.

Our technology is used by content owners (websites, apps), brands and agencies to comply with children's data privacy rules and appropriate content standards in each territory.

Our kid-safe **advertising platform** is connected to online services that serve an aggregate of 90M children and teenagers across the EU. Every advertisement delivered by our technology is watermarked with our *SafeAd* logo, which signifies that the ad (1) is not collecting any personal data (including persistent identifiers), and (2) has been reviewed by a human for age appropriateness.

Our parental **consent management platform**, Kids Web Services, is used by leading mobile games developers to implement the verified parental consent requirement of COPPA and GDPR's Article 8, and to ensure parents have full control over the digital distribution of their kids' personal data.

Finally, we are actively involved in working with the market and regulators in developing and implementing digital child safety policies, including:

- As board director of Mediasmart, which designs and distributes media literacy materials in schools.
- Contributing actively to earlier revisions of the CAP Code, in particular the April 2017 guidance on labelling and disclosure of native advertising aimed at children; and submitting comments to Working Party 29 consultation on Profiling and Automated Processing, Transparency and Consent, and to the ICO consultation on Children and the GDPR.
- Developing and promoting the Kidtech Standard, a common set of principles for responsible developers and brands who wish to engage with kids online.
- Operating Kidaware, an education and training programme that teaches digital professionals how to comply with kids' data privacy laws and to design kid-safe experiences.

Our nearly 7 years of experience in building technology platforms for compliance gives us a unique insight into practical, technology-based solutions to the most difficult challenges, including content moderation, privacy-first advertising, age verification and parental consent.

Our Evidence Submission

We wish to submit evidence on two topics—working with influencers, and platform moderation and reporting—by sharing best practices from two of our market offerings: SA Creators and PopJam. Additionally, we have included some of our primary research into kids

and teens' attitudes to influencer marketing, and their understanding and recognition of advertising, and their opinions about the most popular VSPs.

SECTION 1: WORKING WITH INFLUENCERS

Principle: appropriate content and advertising from influencers starts with informed relationships with specific influencers and brands (and their respective agents). Influencers and brands should be informed on how to advertise correctly, understand the impact of their presentation and be given clear guidelines that are easy to follow.

SuperAwesome Creators (SA Creators)[2] helps brands safely connect with under-16s and families using influencer marketing. The Creators team ensures that campaigns reach their desired audience on appropriate channels with age appropriate content.

SA Creators sets high standards to ensure that the right creators are funded to create safe content across all platforms. This helps build an active and creative market, with safer, trusted influencers.

To support the education of creators and improve standards and safety in the market, SA Creators operates the **SafeFam[3]** pledge and training program. SafeFam trains creators to develop appropriate content for families, and to apply current regulations and best practices, including in relation to labelling of commercial intent and safe working practices. Influencers that have been trained can display the SafeFam badge to show they are committed to providing appropriate content for families. This enables brands to quickly identify which talent is appropriate to work with for kid and family marketing.

Points to consider when working with influencers

Below are our standard recommendations[4] to brands who wish to work with influencers in the kids and family market:

1 Find the right creators

- Research the creators that you wish to work with. Look at past content on all platforms. It's important that there is no harmful content or any risk to a brand's reputation.
- Examine the thumbnails (the promotional images that the creators uses to promote their video content). Most are exaggerated for comic or shock effect, but this is a good place to assess if they are reliant on inappropriate content, such as blood, violence or harmful actions.They may be 'clickbait', but what is the tone, style and feel?

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[2] See https://www.superawesome.com/superawesome-creators/
[3] See https://www.superawesome.com/safefam/
[4] For a summary see https://content.superawesome.com/hubfs/E-books/SACreators_7_Best_Practices_Ebook.pdf

- On YouTube, look at the About page and read the channel description to gain full understanding of the type of content the talent is making and posting. Also, you can get further information on who may be running the channel, the creators or a parent. They may also have management or belong to a particular agency.
- Look at the most popular videos the creator has released, as the most recent videos will not always be fully reflective of the channel and its content as a whole.
- If the channel is managed by the creator's parents, talk to them and learn how they operate the channel. You will need to enquire about their filming schedule and make sure that they are following all appropriate guidelines regarding filming hours and schooling.

2 Disclose paid and gifted relationships

A failure to comply with FTC or ASA guidelines for not disclosing a material relationship or incorrectly featuring branded content can risk fines and damage both talent and brands' reputations. It's important to disclose this clearly, and it must be visible as soon as the content is viewable.

Use language that is easily understandable for a younger audience, such as #ad or #advertisement. Do not use labels such as #Spons #Sponsored or "in collaboration with", as these are not easily understood by children.

Disclosures will look different depending on the format of your sponsored content or the platform you choose. With longer form content, for example, we recommend including disclosures such as:
- #ad on the thumbnail or title of the video
- Disclosure at the beginning of the description box
- Verbal and visual disclosure at the beginning and end of the video
- Visual on-screen disclosure every 5 min throughout the video

Evidence
Examples of clearly labelled influencer marketing by Super Sienna on YouTube, featuring 'AD' on the thumbnail, disclosure at the start of the video and clear disclosure of 'ad' in the video description.

HIDE & SEEK PET RESCUE!!!

107K views • 1 month ago

#scruffaluvs #scruffsurprise
HIDE & SEEK PET RESCUE!!!

107,333 views • Aug 7, 2020   907   15   → SHARE   ⬇ SAVE   ...

Super Sienna
250K subscribers   SUBSCRIBE

HIDE & SEEK PET RESCUE!!! This is an ad for Little Live Scruff Surprise Vet Rescue from Moose
Toys. Rescue, reveal and heal! Check out whole new world of Scruff Surprise on
https://moosetoys.club/3h8NiLd

For static posts on social platforms, such as Facebook, Instagram, and TikTok, disclosures should be clear and call out #ad at the very beginning of the caption. For content such as Facebook and Instagram Stories, #ad should be clearly visible and present throughout all frames of the story.

Evidence

In September 2019, IPSOS produced a useful report: Research on the Labelling of Influencer Advertising, for the ASA:
https://www.asa.org.uk/uploads/assets/uploaded/8cde72e8-796b-430f-9d2d228038286b4e.pdf

3 Brand giveaways must be compliant

Social giveaways are a popular way for influencers to promote branded goods and content, but when working with a younger audience it's especially important to remain compliant. Asking children to send their addresses for prizes, for example, requires processing and

collecting personal data for under-16s. Under both COPPA and GDPR, collecting this type of data requires verified parental consent.

It's important to get legal advice and to ensure you're working with experts to ensure that competitions are compliant with data privacy laws and rules governing competitions and sweepstakes, where appropriate.

This is an example of a kid-safe competition:

4 Set clear content guidelines

Ensure that clear content rules are available for the creators you work with. In line with guidelines provided by the Children's Online Review Unit (CARU) for the US market, here are some basic rules to follow when developing influencer content for kids:

- Do not show kids coming to any physical, mental or moral harm
- Do not show kids in dangerous situations except to promote safety
- Do not encourage bad behavior
- Do not encourage sharing of any personal information
- Do not include swearing, nudity, violence, weapons, cigarettes, alcohol or drugs, blood etc.

Evidence

A good example of simple influencer guidelines is the ASA's 'Love Island cheat sheet for reality TV Stars', which covers a number of important points, presented clearly and in an attractive way: https://www.asa.org.uk/resource/abc-cheatsheet-for-love-island.html.

Creators who join the SafeFam program sign up to the SafeFam pledge, which commits them to minimum standards when working with brands:

SafeFam Conduct Pledge

I confirm that:
1. **I am a family-friendly creator and my content is appropriate for kids of all ages;**
2. **I have read and understood the SafeFam safety guidelines, and**
3. **I have signed and will abide by the Conduct Pledge below.**

The Conduct Pledge

I represent, warrant and undertake that, in the course of making the Content, I will:
1. encourage positive, truthful messaging appropriate to children;
2. demonstrate respect for others' differences, and monitor our content and any related open forums for hate speech of any kind;
3. always clearly identify any video/post that endorses or promotes a product for which I have been paid in accordance with this Agreement, eg #AD;
4. ensure a parent, guardian or agent is present during the production at all times;
5. ensure that anyone under 16 in my video can participate without undue disruption of their normal life, including school;
6. limit the participation of under-16s to single-session durations of no more than 3 hours, and only between the hours of 7am to 8pm;
7. confirm with each participant their understanding of digital permanence, eg that their videos may be visible to the public forever.

And I will not:
1. show content that includes profanity, nudity, sexual innuendo, violence or threats of violence, alcohol or tobacco or drug use, illegal or immoral activities, or language that denigrates any person or groups of people;
2. show kids coming to any physical, mental or moral harm;
3. show kids in dangerous situations or behaving dangerously except to promote safety;
4. encourage the viewer to copy practices that may be unsafe for a child;
5. make children feel inferior or unpopular for not using/buying the product;
6. exaggerate what is attainable by an ordinary child using the product;
7. encourage children to make a nuisance of themselves to parents, or seek to undermine parental authority;
8. allow children to share any personal information in the course of creating the content;
9. include any profane language, or violent or suggestive content that would be inappropriate for an under-13 audience;
10. buy or artificially inflate my follower count or engagement through paid-for or 'like-for-like' means;

Signed:

_____
Name:

5 Ensure the safety and wellbeing of young (minor) creators

If the creator you're engaging with is a minor, it is important to ensure that they and their parents understand how to balance life between social platforms, their education, and extracurricular activities. Keep these points in mind:

- Make sure an adult is present during filming, and that they control the content/direction of filming. This will ensure that the content filmed and posted will be safe and that the kids will have direction while filming.
- Have a parent/adult monitor the comments being posted on social platforms.
- Ensure that anyone under the age of 16 can participate without disruption of their normal life (e.g. not missing school or filming late at night to meet deadlines).
- Take regular breaks during filming.
- Ensure education is not interrupted for filming/extracurricular activities.
- Do not have more than 5 hours of filming a day (New Jersey child actor laws).

6 Pick the right Call to Action

When advertising to adults, calls to action (CTAs) such as 'Buy' or 'Get' are commonly used. Best practice based on the CARU guidelines in the US and the CAP Code in the UK requires that CTAs should be neutral and shouldn't exhort kids to buy or get products. As such, you should avoid using words such as 'buy it now' as they create a sense of urgency that increases "pester power" with parents.

As children are more vulnerable than adults to persuasive messages, it is crucial to tailor your messaging to this age segment not only to ensure compliance with guidelines and regulations, but also to ensure the young audiences' wellbeing.

SECTION 2: PLATFORM MODERATION AND REPORTING

Principle: apps and websites should be designed with children's real-world behaviour in mind, to ensure kids can engage and interact with appropriate content in a safe and responsible way. Users should clearly understand how to block and report content. Using PopJam, we can demonstrate the effectiveness of an approach that combines moderation technology with human oversight and active community management.

Our PopJam platform[5] for creative expression and sharing is now used by companies to safely engage with over 2 million kids monthly in the UK, Ireland, the US, Canada and Australia. The app enables children (typically 6-11 years old) to create art with drawing tools, stickers, GIFs and photos (we don't allow selfies), take quizzes, watch videos and view, heart, share and comment on posts and create posts that others can view, heart, share and comment on. PopJammers can also add and follow friends and take daily creative challenges. PopJammers cannot upload any video onto PopJam. They can only create posts with text, stickers, GIFs, photos or drawing.

PopJam was designed from the ground up to provide a safe, moderated experience for children within a nurturing online community, whilst collecting the absolute minimum of data. It is certified as compliant with the Children's Online Privacy Protection Act (COPPA) in the US[6], and delivers an engaging experience without collecting any personal data as defined under the GDPR.

Furthermore, the PopJam platform embodies what we call 'Responsibility by Design', a series of functional design concepts to ensure a healthy environment for children. As we believe many of these concepts are universally applicable to kids' digital experiences and will be of interest to anyone looking for design guidance, we illustrate some of them below:

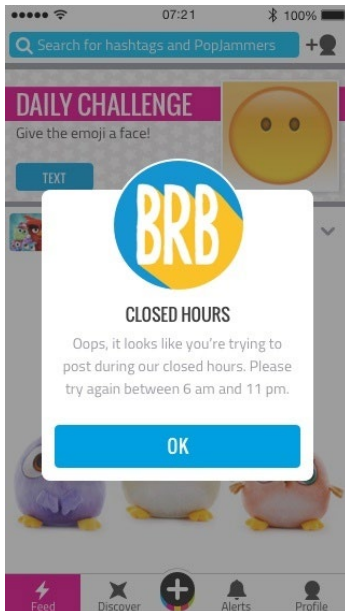### Closing hours

The PopJam platform implements a digital curfew between 11pm and 6am. Kids can still access PopJam communities but they cannot post or comment on posts.

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[5] https://www.popjam.com/
[6] https://www.esrb.org/EPCConfirm/933/

Our definition of closed is to keep kids away from any social elements. We know it is very unlikely that children are with their parents or supervised at this time, and our experience (see below) shows that after-hours social activity tends to contribute little that is positive to the community. This is a popular feature with parents, teachers, as well as charities and safeguarding groups.

The benefits of closing hours are:
- Reduction in naughty behaviour and reduced need for human moderation
- Improved safety for children, less likely to be exposed to predators
- Aligns with parents' offline bedtime restrictions
- Contributes to better health due to reduced exposure to screens late at night

Evidence

Rebecca Newton, SuperAwesome's Head of Community and Trust:

"We did see naughty posts late at night. It's sort of a no brainer in that kids who are up late are normally unsupervised and therefore assume we won't supervise them either—hence, naughtier behavior at night. Also professionally I can say that predators look for kids who are not supervised—kids who are up late and online. They know the risk of being caught is much lower when they find kids who are policing themselves online."

Research has shown that use of technology in the evening has a negative effect on sleep, especially when it comes to children.[7]

Clearly, government regulation has long ago recognised the need to align media consumption rules for children with bedtime, as exemplified by Ofcom's broadcasting rules

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[7] Bedtime Use of Technology and Associated Sleep Problems in Children (*Global Pediatric Health*, 27 Oct 2017)

and the watershed in particular.[8] This suggests children are accustomed to offline media restrictions, so extending these into the digital realm is a logical evolution.

Time limits

We do not operate or enable individual time limits on PopJam. This is currently a topic of active discussion in the industry, and a number of initiatives are underway including Apple unveiling screen time controls, independent apps launching (such as Goozby), and Facebook and Instagram introducing time limit features.

But these approaches are fairly blunt instruments, place a significant burden on parents to proactively manage their children's exposure to screens. For these and other reasons, opinion among researchers remains divided on whether they are an effective tool.[9]

Rather than enabling screen time controls (and inviting parents to get more involved), PopJam's focus is on ensuring time spent in the app is 'quality time'—engaging in creative activities, within a positive community, in a safe environment. For us, responsible design means encouraging positive behaviours and avoiding features whose primary purpose is to extend screen time or encourage frequent returns to the app.

No private chat

It is our firm policy that there is no means of private communication in PopJam—all communications are public.

Private chat in children's digital services creates numerous problems. Because children assume it is fully 'private' (including out of sight of moderators), it encourages inappropriate behaviour that can easily degenerate into bullying. The very presence of a private chat feature may attract predators and enable a channel for grooming.[10] Any chat functions in kids' services must be moderated in real-time, which is a logistical and financial challenge that even the largest social media platforms have not been able to address.[11]

The benefits of not allowing private chat are:
- Improved safety for children, less likely to be exposed to predators
- Better behaviour from users, who know that all their communications are visible to the community
- It engenders an early understanding among children that there is no real privacy online
- It's very popular with parents and teachers

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[8] What is the Watershed? (*Ofcom*, 10 May 2013)
[9] See Sonia Livingstone: The Trouble with screen time rules (*LSE Blog*, 8 Jun 2017); Why the very ideas of 'screen time' is muddled and misguided (*LSE Blog*, 28 Feb 2018)
[10] Roblox: What parents must know about this dangerous game for kids (*Family Zone*, 24 Feb 2017); Fortnite game craze is putting children at risk from online paedophiles, NCA warns (*The Telegraph*, 5 Apr 2018)
[11] Facebook tops list of sites used for online grooming (*NSPCC*, 16 Apr 2018)

Evidence

Rebecca Newton, SuperAwesome's Head of Community and Trust:

"When exploring private chat at Mind Candy, I pulled all the content from private chats for a month or so and found the following "Hi" "Bye" "What's up" "later" was the majority of the private chat. The more lengthy and in depth private chats always led to troubled behavior including cybersex and solicitations for cybersex. Once I presented the team with the evidence, we shut down private chat immediately. We KNOW via data that nothing good comes out of private chat for under 13s."

If digital services choose to enable private chat, we recommend a number of responsible design elements:
- All chat should be moderated in real-time or near-real-time using both technology and human moderation
- Private chat channels should come with block and report functions that are clear and easy to use for kids
- Users should be informed very clearly (and reminded) of the difference between the public and private sections of the experience, and their risks

Promoting good behaviour

Promoting good behaviour is a key part of our content cycle, and an approach that we believe would be good practice for any child-directed app where users engage with each other.

An effort needs to be made to provide regular content to keep kids busy, leading to signposted activities and things to do everyday. Positive in-house content, from Safer Internet Day to regular themed weeks, promotes a positive and enabled community.

Developers should be aware of the power of reward and recognition. For example, PopJam awards Neon Stars (a badge that appears on the player's profile) and shares Daily Challenge winners and runners-up.

Staff interact with active members and acknowledge good behaviour in posts and comments by hearting or commenting. Most behaviours are fine, and kids will naturally take small chances and risks to test new experiences. See below for some examples of in-house content promoting kindness and good digital citizenship in the app:
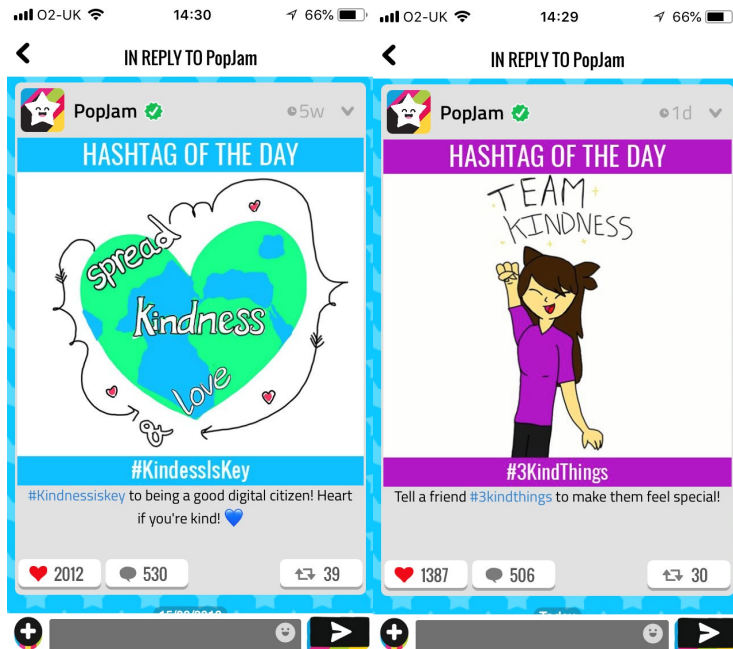
Community and self-moderation

Effective moderation of user-generated content on kids' services has been a huge challenge for the industry for many years. At PopJam we have developed an approach that we believe to be extremely effective. Key to its success is the amalgamation of three approaches into a cohesive whole: AI-based technology, experienced human moderation, and community self-moderation based on trust.

Trust. On PopJam, children post art creations and comments in public channels. Each new user starts out with a low 'trust score', which means that all their posts are pre-moderated (checked before posting). Once a user has demonstrated that they are generally well-behaved, their trust score increases and their posts start to be post-moderated. Any single post that breaches the community guidelines will lower their trust score and return them to pre-moderation.

Technology. PopJam uses software tools for Optical Character Recognition (OCR), image recognition, and textual analysis to filter out posts that need to be reviewed by a human moderator. These tools not only look for inappropriate words and behaviour, but also for potential personal information being shared, such as phone numbers, or photos showing school uniforms.

People. Thanks to these technology and 'trust' filters, our experienced human moderators can focus specifically on those posts or users that have been escalated to them by the system. Their response tends to be constructive and community-focused, eg they will engage with users who misbehave and encourage them to reword their post, or reconsider their actions, ie giving that user an opportunity to repair their trust score. This approach has significant positive side effects within the community, generally raising the standard of behaviour throughout.

In addition, PopJam provides a number of tools for users to self-moderate, which should be part of any age-appropriate design code in relation to apps that allow user-generated content and interaction between users, such as:

- Kids can block others (they understand how to do it and what it means)
- Kids can report others (they understand how to do it and what it means)
- Kids can unfollow content they previously followed
- Kids can delete content they have created
- Kids can delete comments they have written
- Kids can delete comments or stickers under their comments

Evidence

Lynn Snyder, SuperAwesome's Community Technology and BI Task Leader, PopJam:

"The overall rejection percentage of image content is around 5%. Rejection percentages of pre-moderated content is higher, as much as 11% for pre-moderated profile pictures. This shows we are catching attempted selfies before they are posted. The vast majority of deleted content is simply inappropriate (not dangerous)."

Example: Images from PopJam's in-house channel, PJHacks. This channel shows PopJammers how to use the features of the app. Here we have a GIF reminding users how to report content:
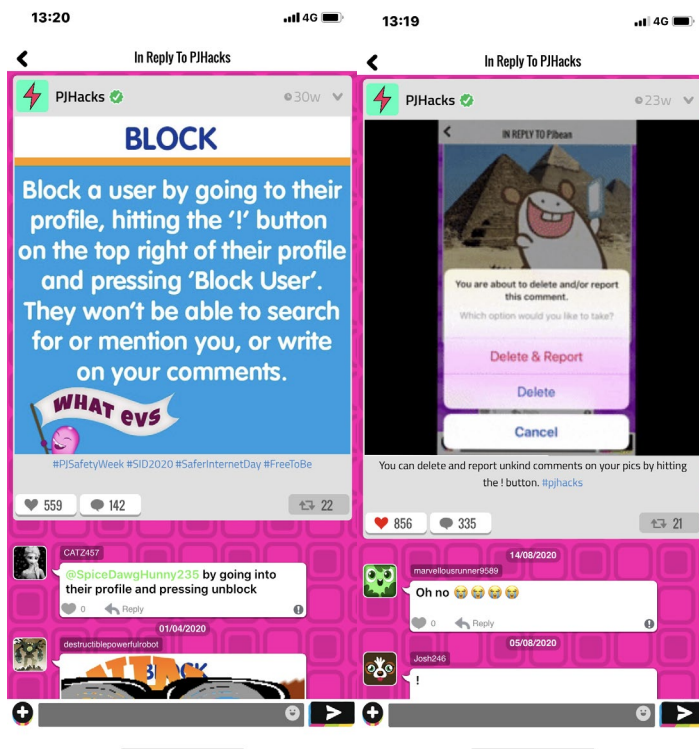
Example: attempted negative language in our moderation tool, and how users self-corrected. Red text was caught by the AI and not featured on PopJam. The user saw their comment continually disappearing, so self edited until the suitable statement is accepted.

We constantly remind kids how to report and block users. Our PJHacks channel reminds kids about good community behaviour, fun tips for the platform, safety messaging and practical tips, such as how to block and report.

SECTION 3: PRIMARY RESEARCH

PopJammers' thoughts on Influencers and Advertising - August 2020

The below PopJam Kids Insights Report was generated internally by asking the PopJam community four specific questions. For this report we collected 100 responses to each question, from global PopJammers in August 2020.

How do influencers or vloggers try to get you to buy stuff?

- They say how good something is (14 mentions)
- Ads (9)
- Merch (merchandise) (7)
- Charities/ donations (5)
- Sponsors (5)
- They don't (I don't buy it/ they don't do it?) (4)
- They talk about it (4)
- No (3)

- Other mentions: Persuasion, make you feel left out for not buying their stuff, discounts and ask us.
- There is a real focus on 'merch' – the products that influencers create and sell themselves, with their logo and catchphrases on.
- Interesting comments: they use capital letters, they put ads in their apology videos, they wear it and it makes you want to buy it and making things look amazing or life-changing.
- Interesting mentions about charities and donations. Are influencers offering a percentage of money from their merch to specific charities? Homeless and poor people mentioned.

What do you think about influencers trying to get you to buy stuff?

- I don't mind/ it's fine (11 mentions)
- I don't care (4)
- Bad (4)
- IDK (3)
- Annoying (3)

- Weird (2)

- Rude (2)

- Okay (2)

- Awful (2)

- Amazing (2)

- Other mentions: I don't mind and it's fine, often followed by 'as long as it's not on every video' or 'okay if not too much.'

- There were lots of varying single responses to this question. A lot of single negative responses.

- Some think it's fine; 'they're just people trying to make an honest living off the internet' and 'it gets annoying but I know they need the money'.

- Some do not like it: 'I think they're scamming people out of their money and selling out', 'it's annoying and bad to advertise to kids' and 'sneaky'.

- Some think it's important that the influencer likes and uses the product they advertise; 'they use us for money if they don't already use the product'.

Before you buy something online, how do you check it's real?

- Reviews (29 mentions)
- I don't buy stuff online(8)
- Check website (7)
- Ratings (4)
- Ask my parents (4)
- Search online (3)
- Research it (3)
- Check price (3)
- Look at pictures (3)
- IDK (3)
- Just go to a store (3)

- Other mentions: Kids rely heavily on reviews, and ratings. A few think it's important that the ratings are high. One mentions that reviews could be fake.

- Checking that websites are official is important, and two PopJammers mention ™ symbol.

- Some said they would ask their parents to check and that their parents would make online purchases (we are minors we don't buy stuff!).

- Photos are important, and reviews with photos, One mentions that photos can be photoshopped.

- Watching videos of the product gets two mentions, but reviews possibly includes influencer video reviews.

What is good about watching influencers or vloggers?

- Inspirational (17 mentions)

- Entertaining (10)

- I learn from them (9)

- They're fun (9)

- They give me ideas (7)

- They're funny (5)

- Nothing (4)

- IDK (3)

- Other mentions: You know what to expect, you can discover new games, they make you want to be you, they make you feel loved and you get a glimpse into their life.

- We know from PopJam that kids love inspiration and for ideas (nothing is worse than being bored). They like tips, challenges and life hacks.

- One PopJammer states they prefer challenges over vloggers – vlogging more associated with 'lifestyle' content.

- Two PopJammers mentioned that influencers and vloggers have made quarantine less boring.

RECOGNITION OF ONLINE ADVERTISING

Below is an excerpt from research conducted and delivered for the CAP's Call for Evidence in late 2019 regarding children's ability to recognise commercial intent in advertising.

Slide 8

Children have a wide range of cues to recognise marketing

1

Spontaneously, interruption to desired content is one of the biggest indicators of online marketing across the age groups

Evident even in the youngest children in the parent pass-back

2

Children also recognise advertising from clear labelling, as well as an encouragement to buy

- Posts show ad / #ad
- pricing/ discover more

3

Being able to opt out (skip ad, 'x') is another key signal. The skip ad sign is considered a label by many

Even the very young are able to self select out of advertising should they choose

Strictly Confidential | © SuperAwesome Ltd 2019

Slide 17

Children have a wide range of cues to recognise marketing

1

Large Logos/brand names

The size and placement of logos and brand names help to signal marketing across all ages

2

Recognisable ad formats (especially older children) banners, interstitials

Children have learnt how to recognise marketing from much used formats

3

When present, the SafeAd mark is a powerful indicator for kids 5 - 11

Less so, but not unimportant, for parents of younger kids, for whom interruption and logos are key

4

Labelling is a key cue, be that 'find out/discover more', hashtags or overt call outs

This most transparent route is particularly clear for older kids

5

Influencer & embedded content (especially when not labelled) is ambiguous

Extra care is needed around this kind of content to ensure that it is clearly labelled as advertising

6

The older the child the more adept at interpreting advertising

Children acquire recognition skills as they get older

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Slide 20

## Less clarity for social and YouTube marketing

Some recognise hashtags and language

However there is much less certainty.

Social and YouTube unless very clearly labl ed have much more scope for misinterpretation of advertising content

Clear need for more transparency with this kind of marketing content for children

NOTE the way the question worked in the survey means that blank spaces are areas of obvious no advertising are when they don't think there is any advertising on the page
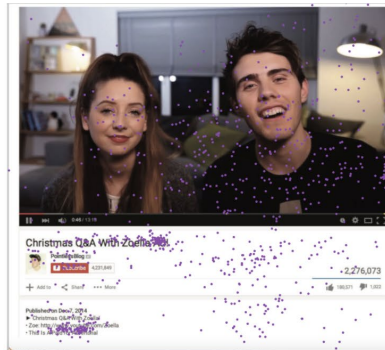
Slide 24

Most likely location of online advertising - 5-11 y.o.

Where have you come across ads online?

The power of interruption / pop ups

'Pop ups' are the most recognised type of ad by 5-11 y.o.s (especially amongst older 8-11 y.o.'s)

Interruptions and banners are also highly recognisable
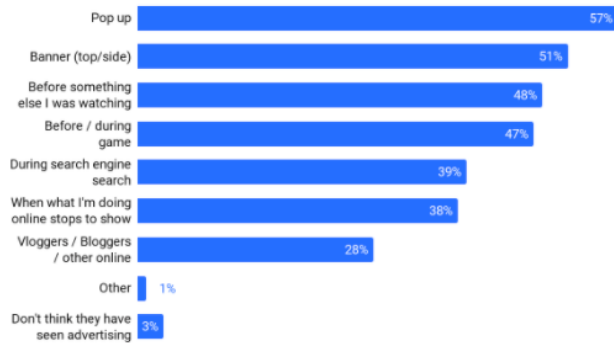
Pop up	57%
Banner (top/side)	51%
Before something else I was watching	48%
Before / during game	47%
During search engine search	39%
When what I'm doing online stops to show	38%
Vloggers / Bloggers / other online	28%
Other	1%
Don't think they have seen advertising	3%

Base: Children aged 5-11 y.o. (n=531)

Signposting ads to young children is important

What would be the best way of making sure that your child understands something is marketing / advertising online?

Overt signposting and interruptions are considered the best way to indicate advertising to young children by parents.
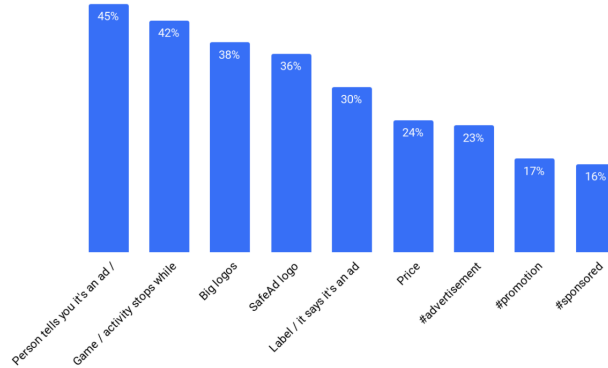
A third of parents consider the SafeAd logo as the best way of making sure their young 2-6 y.o. children understand something is an ad.

Bar chart:
- Person tells you it's an ad /: 45%
- Game / activity stops while: 42%
- Big logos: 38%
- SafeAd logo: 36%
- Label / It says it's an ad: 30%
- Price: 24%
- #advertisement: 23%
- #promotion: 17%
- #sponsored: 16%

Base: Parents of 2-6 y.o.s (n=216)

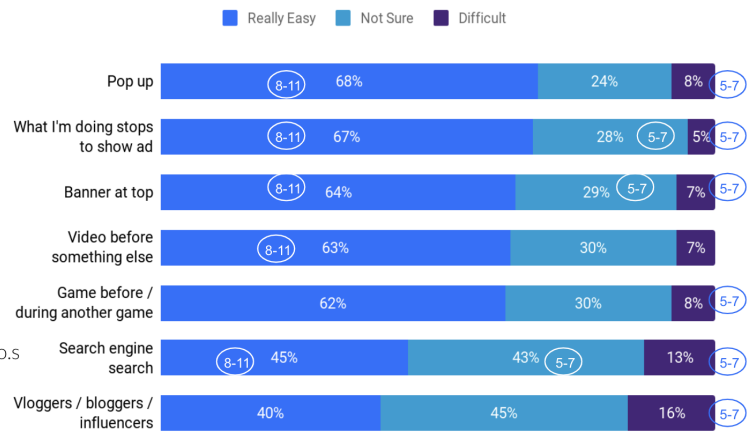## 5 - 11 y.o.s can confidently recognise online marketing

How easy is it to tell when something is an ad?

Around 2/3s can confidently recognise most online marketing

Least confidence in influencer marketing

The easiest to identify as ads by 5-11 y.o.'s

Most are easier to identify for the older, 8-11 y.o.s

Legend: Really Easy | Not Sure | Difficult

	Really Easy	Not Sure	Difficult
Pop up	68% (8-11)	24%	8% (5-7)
What I'm doing stops to show ad	67% (8-11)	28% (5-7)	5% (5-7)
Banner at top	64% (8-11)	29% (5-7)	7% (5-7)
Video before something else	63% (8-11)	30%	7%
Game before / during another game	62%	30%	8% (5-7)
Search engine search	45% (8-11)	43% (5-7)	13% (5-7)
Vloggers / bloggers / influencers	40%	45%	16% (5-7)

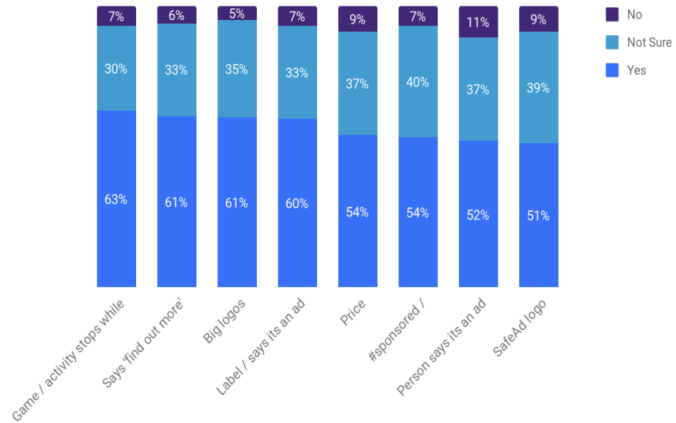Base: Children aged 5-11 y.o. (n=531)

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SafeAd labelling provides clear signposting for older kids

If something is an ad, which of these would you expect to see / hear / happen?

SafeAd logo is expected by many (half) of 5-11 y.o.'s

But many other elements are expected more - such as interruptions, 'find out more', big logos and labels

Legend: No / Not Sure / Yes

	Game / activity stops while	Says 'find out more'	Big logos	Label / says its an ad	Price	#sponsored /	Person says its an ad	SafeAd logo
No	7%	6%	5%	7%	9%	7%	11%	9%
Not Sure	30%	33%	35%	33%	37%	40%	37%	39%
Yes	63%	61%	61%	60%	54%	54%	52%	51%

Base: Children aged 5-11 y.o. (n=531)

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SafeAd does what it says
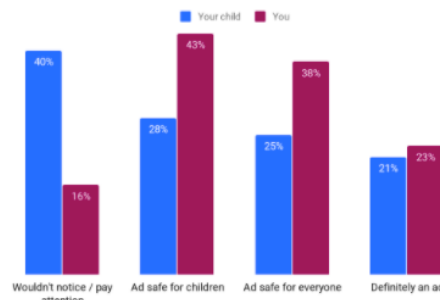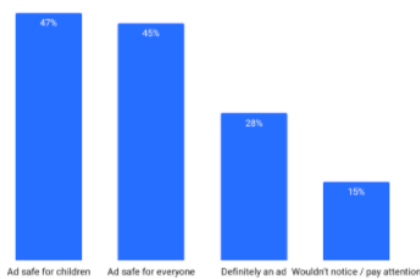
What do you think it means when an ad has the SafeAd logo on it?

SafeAd logo communicates safety to most 5-11 y.o.'s

Great levels of relevance with 85% cut through

Ad safe for children	Ad safe for everyone	Definitely an ad	Wouldn't notice / pay attention
47%	45%	28%	15%

Base: Children aged 5-11 y.o. (n=531)

Much lower projected levels of relevance amongst 2-6 y.o.s

Although the safety message penetrates for the parents.

Legend: Your child / You

	Wouldn't notice / pay attention	Ad safe for children	Ad safe for everyone	Definitely an ad
Your child	40%	28%	25%	21%
You	16%	43%	38%	23%

Base: Parents of 2-6 y.o.s (n=216)

OTHER BESPOKE RESEARCH

Kids & teens views on YouTube, Twitch, TikTok:

YouTube: an endless source of entertaining content

✓ Limitless content – always something or someone new to discover

✓ Maker of influencers

✓ Supports following **and** interacting

✓ Great for lovers of ALL content

✓ Recommends relevant content to users

✓ Language/content aimed at older users is aspirational to many younger users

✓ Facilitates live streaming uploads

✓ Facilitates full length videos

✗ Can get a bit lost in navigation

✗ Lots of content to sift through

✗ So many users and comments – low perceived chance of being noticed or responded to

✗ Commenting and response restrictions

✗ The ads

✗ No moderation of toxic behaviour

YouTube is great because you get to see the celebrities you like doing fun activities or challenges, for example, the eat or wear it challenge, or staying 24 hours in a tent (F, 13, Some interest in gamers)

I really like YouTube because you can watch people live at the moment and see what they where doing and ask them questions in chat and there is an incentive to watch for funny moment and bonding with YouTubers while maybe even playing with them.(M, 12, Some interest in gamers)

YouTube is fun and unique and is a great platform to find influencers. I like that YouTube recommends videos that they think you might like. This is how I find new influencers. (M, 11, Very interested in gamers)

YouTube is my favorite because you can make money off of it. also, once you reach a certain amount of subscribers (100,000 1,000,000 10,000,000 50,000,000) you will get a reward from the official YouTube Headquarters, a play button trophy. (M, 13, Very interested in gamers)

My least favorite steaming app I guess would be YouTube if I had to choose one. I don't use the other apps though so that's why I chose YouTube. Sometimes it's hard to search for the right video because there are so many videos on YouTube. (F, 10, Interested in gaming not gamers)

YouTube is not broken, it does a good job of providing endless entertaining content and fulfilling basic needs. The emotional reward for interacting with influencers is high (more exposure), but the *chances* of reward are low in comparison to other video apps

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Twitch: specifically for those who like streaming

✓ Watching live streams

✓ Meeting new people

✓ Chatting with other gamers

✓ Playing with other gamers

✓ Overcoming shyness

✓ Getting involved with charity live streams

✓ Accessing private servers to play exclusive games with influencers

✓ Opportunities to win free stuff

✗ Limited functionality: can't post videos – can only save your live streams

✗ Live streams are not top priority for gaming non-enthusiasts

✗ Can be harder to find fresh content from most-loved influencers as they don't post every day

✗ Perception that it is a paid for app

✗ Some reports of 'creepy' behaviour from other users

Twitch is kind of boring "sometimes " because the people that I like to watch don't stream every day and I'd like to see more of them. (M, 12, Very interested in gamers)

My least favorite app is Twitch because there is some creepy people on there. (F, 11, Very interested in gamers)

Twitch is kind of boring because there is not that much to do. (M, 12, Very interested in gamers)

Watching live streams is something that a lot of gamers enjoy, but it is a feature rather than a destination, so Twitch will almost always be used in addition to other apps like YouTube, which offer greater variety of content and functionality.

TikTok: for those who love sharing content

✓ Great for lovers of celebrity/influencer content

✓ Connecting with friends and sharing favourite influencer content amongst friendship groups

✓ Watching and supporting friends' content

✓ Comment/like function & editing features

✓ Suitable for all ages

✓ Large variety of inspirational content

✓ **Maker of influencers; leads kids to discovering their YT channel afterwards**

✗ No chat function like Discord

✗ Feels less personal; can't hear influencers' voices like on YouTube

✗ Live streams are not a top priority

✗ Perception that a lot of creators are banned from the app

TickTok and Youtube are both social medias that only contain videos for people to watch [...] Discord is an app that allows you to speak with friend through long distances over gaming. (M, 13, Social Gamer)

I like to use TikTok to see what my friends are doing and what celebrities are doing. (F, 13, Interested in gaming)

TikTok is just dancing and you don't really get to hear people's voices while in YouTube you hear the celebrities voices but through a screen. (F, 13, Interested in gaming)

You can watch other people's videos too and comment or like them. They have really cool dance ones and others that show you how to make stuff like slime or food. You can get lots of fun ideas. It's for kids ages 7-adults. There are so many people you can follow and do many cool types of videos. You get to create your own videos and edit them with all the features they offer. You can slow it down, speed it up, change your voice, makes them with friends. [...] I don't post everyday but when I get to hang out with my friends we always make TikToks. (F, 10, Content Consumer)