

What do you think?

**Summary of the responses received from
children and young people
to the Phase Two consultation**

Introduction

The child friendly consultation document - *Children's Advertising - What do you think?* – was written to ensure that children and young people were given the opportunity to give their views on the children's advertising code. This was the first time that the BCI had proactively sought to engage children and young people in consultation and the first time that it had produced documentation specifically targeting children. The BCI decided to undertake this work in keeping with goal one of the National Children's Strategy, which advocates that children and young people should be consulted in matters of policy which will impact on them.

The document asked children for their views on the same range of issues as presented to adults in the adult consultation document. This was regarded as important, in order to ensure that meaningful comparisons could be made between the responses given by adults and those given by children. It was also done in order to ensure the instrumentality of the children's consultation, that is, that rather than asking children for their generalised views about advertising, questions were focused to ensure that children's responses could be used to formulate the new children's advertising code. While the same range of issues was presented to adults and children, they are, in many cases, framed differently in order to be accessible for a younger audience.

Over 260 children and young people responded to the consultation, via the BCI website (specifically designed for the consultation) and in written form. Some replied as individuals; some as part of a class project in school. Based on details provided in submissions regarding age, children between the ages of 10 and 17 responded to the consultation.

This document is a summary of the views expressed in the 260 submissions received. Individual children are not identified in this document as a matter of principle, and, indeed, children were not required to give their contact details on the website, in keeping with best practice guidelines in this area. Those who replied in written form have supplied their names and contact details. However, for consistency and privacy reasons, any quotes included in this document are not attributed to any particular child. All the submissions received from children are available for viewing in the Broadcasting Commission of Ireland's offices.

This document is structured into 16 sections, corresponding to the 16 questions posed in the consultation document. Each section of this document outlines the question posed and the responses received. In the introduction to each question, a brief explanation of the issues to be considered is given - firstly as these issues are presented in the adult document and then as they are subsequently framed and presented in the children's document. This is done in order to enable direct comparisons between the responses from adults and those from children and young people. Each section is titled as the question was presented in the children's consultation document.

1. Should there be a rule about the way people behave in children's advertising?

The first issue that was considered was whether the code should make reference to social values in children's advertising. In the adult document, there are two questions, namely whether it's appropriate to include reference to social values in the code and, secondly, if so, whether they should be referred to in principle or outlined specifically.

In framing this issue for children, the question concentrated on the 'behaviour' of people in advertising as the tangible expression of these social values. It was felt that the term 'social values' is quite a complex concept that would not lend itself to easy interpretation by children.

Children were asked to consider whether there should be a rule about the way people behave in children's advertising. In posing this question children were also asked to consider whether they believed children try to copy the behaviour exhibited in children's advertising, as this impacts on the perceived need for a rule.

The overwhelming majority felt that children do copy what they see in advertising. Responses made reference to this as being particularly true of younger children. However, some respondents also said that older children imitate behaviour from advertising also. A small number of respondents said that it depends on the child and the advert, or that it is only an issue for younger children.

The reasons as perceived by respondents as to why children copy what they see in advertising can be summarised as follows:

- If older people or adults are behaving that way, then children believe it must be okay to behave that way.
- If adults are doing it, then it's a grown-up thing to do and, therefore, a good thing.
- Children may not realise that the advertisement is make believe and that people are acting
- If bad behaviour is glorified or seen as a cool thing, then children will copy it.

In their responses, the children focused primarily on the portrayal of 'bad' behaviour that should be avoided in advertising rather than focusing on 'good' behaviour that should be proscribed in advertising.

Children expressed concern over a number of particular behaviours, namely bullying, being mean, being rude, stealing, using bad language, violence, smoking and drunkenness. They felt that these behaviours, in particular, should not be in children's advertising. Or if they are, that they are shown within the advert to be undesirable and a bad thing.

In summary, children were emphatic in their belief that the code should have a rule about the way people behave in children's advertising.

2. Do we need a rule to make sure that children and young people understand what is really being advertised?

The adult document posed questions regarding a child's inexperience and credulity and how the code could best ensure that advertising does not take unfair advantage of children. This can refer to the expectations that a child may have of a product based on the advertisement, and, in particular, that it does not exaggerate the characteristics of a product through the use of special effects, imagery, language or unclear demarcations as to what is included in the product at the time of purchase.

In framing this question for children, they were asked whether we need a rule to make sure that children and young people understand what is really being advertised. Reference was made in the consultation document to the example of a toy and the way this can be advertised.

This question was one of the four questions that attracted most comment from children and young people. Many children made reference to their own experience of products that they had purchased or received that did not live up to the expectations engendered by the advertisement for that product. Reference was made to younger children as being particularly likely to believe what they see - hence the need for advertising to be clearer in its description of the product being advertised.

The overwhelming majority of children responded that a rule was needed to make sure that children understand what is being advertised. In response to what that rule should say, the following issues were identified and discussed by children in their responses. In each case, the rationale for the existence of the rule is given and a suggested rule supplied, as articulated by the children in their responses.

Issue	Why?	Rule
Size of product	Products are made to look bigger than they are in reality	Advertising should give an indication of the real size of the product
Range of products or accessories included	Children think that they will get all the accessories and pieces that they can see in the ad and are disappointed when they receive the product and it is only one piece with everything else costing extra	Advertising should let children know what they get when they buy the product and what they have to pay extra for

Batteries	Children do not realise that the toy needs batteries	Advertising should indicate clearly when batteries are needed
Has to be assembled	Children think the toy comes assembled and are disappointed when they realise it doesn't. Or they don't realise that they need to be older to build it	Advertising should indicate clearly when a toy has to be built and what age you need to be to be able to make the toy
Language	If an advertisement says that something is magic, then younger children might believe this.	Advertising should not use language that could confuse younger children and make them think that the product can do something it can't
Use of special effects	It makes the product look better and bigger than it is and young children may not understand the difference between what the special effects are doing and what the product can do on its own. They might think it has special powers.	Advertising should not use special effects to make a thing look like it can do things that it can't.

In their responses children showed an awareness that the purpose of advertising is to present the product in an attractive manner that will encourage them to buy it. They made references to the use of special effects, of exaggerated backgrounds and particularly the inclusion in the advert of accessories that are not included with the product when they buy it.

'This can be a clever approach used to sell products but it deceives the child who buys the product expecting to get exactly what they saw in the advertisement. To an adult it might be clear from the ad that the toy is small or needs to be assembled but to children it is not. Things need to be made obvious to children so they know exactly what the product is, what size it is and whether it needs to be assembled or not.'

Children also showed an awareness of the practice of advertisers of including ‘small print’ notices on television advertising that say when batteries are needed or the fact that the product has to be assembled and is suitable for only certain age groups.

They equally had much to say as to the manner in which this is done and many made reference to the need for rules about the way advertisers present this information to children. With regard to small print, the overriding recommendation was that this should be ‘big print’ and stay on the screen for longer, or as some suggested, it should be voiced on the ad for children who can’t read.

‘Most small print is in the corner, but most children wouldn’t be able to or bother to read, I think they should say it.’

With regard to special effects, the majority of responses received can be summarised in this quote:

‘Yes we need a rule, little children don’t understand that the ad might have special effects and that it doesn’t really work by itself or that you might have to build it or it might need batteries. But I think that if the toy is good enough it should not need special effects. No special effects while showing children’s toys. Show exactly what size the toy is, and if its part of a set include that too.’

In summary, children felt very strongly that the code should contain rules regarding factual presentation in children’s advertising and the proposed rules as outlined above as a way their concerns could be addressed.

3. Pester Power – Do we need a rule to make sure children’s advertising doesn’t put children, young people and parents under pressure?

Adults were asked to consider the heading ‘avoiding undue pressure’. This heading dealt with what is commonly known as *pester power*, when a child repeatedly asks his/her parents/guardians for a product or service. The heading also discussed the pressure or anxiety that children may feel to possess certain products or services and the implications that may arise for their self image.

In framing this for children, two questions were posed. Firstly, whether they believed that advertising makes children and young people ask their parents for things they have seen on television and secondly, whether there should be a rule in the code that ads can’t tell children to ask their parents to buy things.

This was one of the issues that attracted most comment from children. The overwhelming majority of respondents agreed that pester power does exist and children and young people ask their parents to buy them products and services. They agreed that parents can feel pressurised as a result. They cited two reasons

why parents feel pressurised. Firstly, due to monetary concerns, because they can't afford to buy the product but equally that they feel they have to buy the product or their child will be unpopular.

'Parents feel under pressure because they don't want their children to feel left out. The child is under pressure if everybody else has it and this is not the ads fault.'

While children agree that pester power exists, they questioned whether it can be wholly attributed to advertising. They agreed that advertising has an influence on them but argued that their peers exerted an equal, if not greater, influence than advertising on what they asked their parents/guardians for. So, while advertising was one influence, friends were also considered to be another strong influence.

'Other children have these things and that's why children ask for these things'

'Other children who have it make it pressurising for the kids that don't have it'

'Children have pressure because the children in class have toys and children are under pressure to get the same ones. Parents have pressure for money to get the toy especially dear ones'

While respondents talked about the pressure exerted on parents, they also spoke about the pressure on children themselves and made a particular link between the possession of a product and their popularity.

The acquisition of a product was portrayed as being important not just because of the value of the product itself for the child, but rather its perceived ability to attract friends and to ensure popularity. Many said that this is particularly the case with younger children.

'Stop trying to make things cool telling children and young people that if they get a certain toy they will have lots of friends'

Need to tell children you will not have everyone wanting to be your friend if you have a certain thing.

'Phrases 'you'll have loads of friends if you get this' or 'it's the toy you must have' should be banned'

Quite a number of respondents went on, however, to say that ultimately it is up to parents to make a decision as to whether they are going to purchase the product for the child and the majority of children made no reference to advertising being a bad thing per se. Indeed, a small number of respondents said that advertisers have to be allowed to show their products and that children are going to ask for products whether there is a rule or not.

'How else are toy companies supposed to advertise their merchandise if they aren't allowed to advertise on tv?'

‘Some children will put their parents under pressure to buy at the end of the day it is a parent’s decision whether to buy or not. Encouraging children to save towards an advertised item or buying it for a special occasion would be better. No rule could be enforced.’

‘Yes advertising makes children ask their parents for toys but there’s nothing to stop parents saying no is there? I know pester power can be annoying but parents should have enough control over the matter and if they don’t then it’s their fault. So just say no, no need for rule.’

Despite the fact that most children cited peers as an equal influence to advertising, the majority of children said that a rule about pester power was necessary in the advertising code.

A small number of children also made reference to the volume of advertising, especially in the Christmas period, suggesting that, if possible, this should be curtailed as it contributes to pester power.

In summary, when describing the type of rule that should be in the children’s advertising code, children focussed on two themes. The first that advertising should not tell or encourage children to ask their parents for products and secondly that advertising should not make children think that if they have the product they will be more popular and have more friends.

4. Responsibility of parents – whose job is it to protect children and young people?

Parents or legal guardians have the primary responsibility for the upbringing and development of the child. However, the existence of a children’s advertising code suggests that there is some responsibility on the part of advertisers and broadcasters for the well being of the child. The adult consultation document asked people to consider how the balance of responsibility between parents/guardians and advertisers/broadcasters should be expressed in the context of the children’s advertising code.

The children’s document asks “whose job is it to protect children and young people?” Is it up to parents/guardians or the television stations? In order to prompt thinking and express the concept of ‘responsibility’ tangibly, children were also asked whether they thought that children watch things that are unsuitable for them sometimes and who should make sure this doesn’t happen, the parents or the television station?

All children who responded agreed that children can and are watching unsuitable material. In general, however, the presumption expressed by respondents is that unsuitable material is broadcast in the evenings. Based on this presumption, no respondent felt it was solely the responsibility of broadcasters or advertisers to

protect children and young people. The majority of children responded that there is a shared responsibility between advertisers and parents, but that ultimately parents have the primary responsibility regarding their children viewing. The point was also made that children differ as to their maturity and parents are the best judge of how mature their child is and what material is suitable for him/her.

In describing the responsibility to be afforded to broadcasters, this was expressed very strongly in scheduling terms. There was a recognition and awareness among children that television stations use the time of day to determine when to put on material unsuitable for children. The station's responsibility then was to ensure that they did not schedule adult material at times that are known to be children's viewing times. Once past these times, respondents felt strongly that responsibility shifts to parents to ensure that children are protected from unsuitable material. However, they felt that parents '*can't be there all the time*' and so they should be able to trust the stations to be responsible during the daytime.

A number of times were suggested by respondents as to when parental responsibility takes over. These times ranged from 6pm to 9pm, with the majority of children showing an awareness of the 9pm watershed, as a time after which it is likely that material is intended for adults only.

'Yes children are watching unsuitable programmes, we all know this but I think it is up to parents because it is their choice whether they want their children to watch adult material or not. Children have their TV time during the day so I think adults should have their time from 6 onwards and it is their responsibility what their children watch after that.'

'It's the job of parents to stop children watching unsuitable programmes. What can television do anyway, they already put unsuitable programmes on late at night.'

'The television station can only do so much, they are unable to judge whether a programme is suitable or not as it depends on the maturity of the child. The parents are responsible for their children and it is only they who can judge fairly.'

'I think it's half and half, it's the television station's fault if they show an unsuitable ad during children's viewing. Then it's up to parents if they don't want children to see the ads to get them out of the room or turn off the television.'

'Yes I would say 50:50 on this one, because parents can't stop children watching unsuitable ads or programmes during the day but can make sure they don't if they are on at a certain time so if the parents don't allow children to watch after a certain time and TV stations don't put them on until later nobody can get blamed in the wrong.'

In summary, the responses suggest that children think that broadcasters should be required to schedule advertising responsibly and that parents should be able to rely on broadcasters to do so during children's traditional viewing times. The responses

also suggest, however, that during hours associated with adult viewing, parents hold primary responsibility for what advertising their children are watching.

5. Do we need rules about children who are in ads?

This section corresponds to the section in the adult document entitled ‘Special Protection for Children in Advertising’. While the code will aim to offer protection to children as viewers and listeners, this section was included because respondents to the first phase of consultation felt that rules are needed to give protection to the way children are *represented* or *portrayed* in advertising. A number of issues were identified including:

- The sexualisation of children
- The use of children to present products or services
- The use of adult actors to portray children
- The privacy of the child and his/her family

These issues were presented to children using the question ‘*Do we need rules about children who are in ads?*’ The document then specifically asked the following questions:

Adults pretending to be children – Do you think adults should be allowed to pretend they are children in ads? Why?

There was some dissent in the responses received to this question. Children who felt strongly that this should not be allowed, said that it was insulting when adults pretended to be children on advertising. They said that it ‘portrays children as idiots’ and that it shows a lack of respect for children.

‘No, I don’t think adults should be allowed dress up as children because we have to respect them so they should have to respect us.’

‘No, it is insulting to see an adult doing your job which is acting like a kid’

Some made reference to it being confusing for children to see adults pretending to be children and that it may lead children to dress older.

‘I think it is wrong when I see an ad where an adult is dressed up as a child and sending a message out that every child is an idiot. Maybe some children are a little immature but there are some adults that are not so perfect. The broadcasting company always pick outrageous ideas so their ads would be funny. If you looked at some of the ads you would find that today’s children don’t buy water guns to run

down the street to squirt strangers. We buy them to have fun with our friends. Adults pretending to be children – think about it from our point of view and you'll see why a lot of us are so insulted.'

A smaller number of children argued that these ads are funny and comic and that a rule against them would be 'pointless'.

Do you think there should be a rule that says children and young people in advertising should not be made to look like a grown up or older than they are or to do grown up things? Why?

There was a strong response to this question and the rationale behind the majority view goes back to the children's belief that there is a propensity for imitation by children of what they see on television.

Respondents made particular reference to the effects on young girls of this type of advertising. Specifically, they felt that girls are shown in advertisements wearing 'revealing' clothes and make up and that girls watching these ads come under pressure to look a certain way. Some boys who replied made reference to girls that they know and what they see as the 'effects' of this type of advertising on the way they dress and their behaviour.

'If kids see other kids on TV they will naturally enough want to wear what they are wearing and these children are wearing mini skirts, revealing tops, bras etc. and this is especially in the age group of 5-11, all other children would want to dress up like them'

'There should be no advertisements with just beautiful looking children who are 'completely perfect' but there should be a mix of all shapes, sizes, races and looks of course. By showing perfect children all of the time, children watching want to look like the children but this is usually not possible.'

A small number of children said that children are inclined to want to be 'grown up' anyway and so advertising is not doing anything new.

'Little girls go through the stage of acting like grown up people anyway so it doesn't make a big difference.'

Do you think there should be a rule that says that ads should tell children and young people to ask their parents permission before they send in information about themselves?

Children responded very strongly to this question. The vast majority of children spoke about the 'danger' of what might be done with information that children give to advertisers, especially in the context of the internet, and the fact that younger children may not be aware of these dangers.

The primary danger children mentioned was ‘strangers’ and children also made reference to paedophiles and pornography. These fears as expressed by children can be summarised by the view below:

‘I think advertisements should tell children and young people to ask their parents permission before they send in information about themselves. They usually ask for name, address, age, phone, hobbies. If something went wrong on the internet, all your details could fall into the wrong hands. You could be in great danger and the stranger might send letters to you and pose as a child the same age as you. You might think you have a pen pal but it might be a stalker.’

Some children said that advertisers should not ask children for personal information in the first place. However, children were unanimous in agreeing that there should be a rule that advertising must tell children to ask their parents permission before they send information about themselves or their family.

Should ads be allowed to have children and young people in them telling other children how good something is?

This issue arose for consideration based on the existence of provisions in codes in other jurisdictions which regulate the use of children in formally presenting products or services that they could not be expected to buy themselves or to comment or to provide testimonials on products or services.

In the children’s document, this is framed in terms of whether children should be used in advertising to promote a product. Children were asked to consider whether they think that if a child in an advert says that a product is good, children will be more likely to believe them than if an adult were used to present the product.

Fewer children responded to this question. However, those who did expressed the view that children are more inclined to believe other children and more likely to be influenced by them. Some children commented that this could also lead to peer power.

‘No, because most of the time this is not true, the toy might not be as good as it is said to be and children and young people will believe this faster from children than from adults.’

A number of children commented that it would be useful for public health or educational campaigns.

6. Should people and puppets and characters from children's programming be allowed in children's advertising?

This section corresponds to the question posed in the adult document around the use of well-known programme characters or presenters, both real and cartoon-generated, to promote or endorse products and services. The question was prompted by concerns, as expressed in codes in other jurisdictions, that the presence in advertising of well-known characters could unfairly take advantage of children's emotional attachment to these characters or persons.

Children were asked whether they believed that young people might feel 'bad' or disloyal or that they are betraying their favourite characters if they do not buy the thing being advertised by that character. Based on their views, they were then asked to consider whether they believed there should be a rule in the children's advertising code.

Children in their responses showed an awareness that the presence of puppets or programme characters would attract children's attention and increase the likelihood of their being positively disposed to the product. Some children went on to say that it should be allowed within advertising because it works as an advertising technique. One child likened it to the use of sports professionals and celebrities in advertising and questioned whether it was fair to have two rules, one for programme characters and one for sports people.

A small number of children made the point that they don't believe children are influenced by this type of advertising;

'I doubt if any child will want to purchase a product just because a character they like is in the ad and even if they did the changes of them feeling disloyal to their character if they didn't buy the product are slim.'

The majority of children, however, said that they believed there should be a rule in the children's advertising code about the use of programme characters and puppets in advertising. In explaining why there is a need for such a rule, children said that the presence of the puppet or character could make children want the product rather than the merits of the product itself and this wasn't fair.

'No because if a young child is watching say power rangers and it goes to ads and the power rangers are doing an ad for something the child might think this is part of the programme and get confused.'

Some of the main points made by respondents are outlined below:

- Children may only want the product because their favourite character is in the ad
- Children will feel disloyal to their character if they don't buy the product

- Children will feel pressurised/upset/bad if they don't buy the product
- It exploits the child's trust towards the puppet
- It could lead to confusion between a programme and an advert
- It's manipulative

However, children said that characters should be allowed to promote messages that are about health or educational messages.

'Using puppets, TV characters is a bad idea. You're exploiting the child's trust towards the puppet. They should only be used for promoting charities or for other good causes.'

7. Safety – How do we make sure that children's advertising doesn't put children in danger?

This section on safety aimed to elicit from respondents the rules that should be incorporated into the code aimed at preventing advertising that would mentally, socially, physically or morally harm a child or young person. This section is entitled Safety/Avoidance of Harm in the adult document.

Safety

In presenting the safety issues to children, the consultation document outlined the belief that children may copy what they see in advertising and therefore advertising should show children doing things safely. The document then outlined a list of the kind of rules that exist in other countries and asked children whether they felt it was a good idea to have these rules. They were also asked whether there were other rules they felt should be included to make sure that children and young people in advertising are showing a safe example.

The rules listed were as follows:

- Children and young people should not be seen going to strange places or talking to strangers
- Children and young people should be seen using the safe cross code when they are crossing the road
- Children and young people in advertising should be seen wearing helmets if they are cycling or skateboarding or skating and wearing safety belts if they are in a car
- Children and young people in advertising should not be seen bullying other children or behaving badly to other people
- Children and young people in advertising should not be seen using machinery or matches or near a fire
- Children and young people should not be seen using medicines without parents help

Children were unanimous in supporting the inclusion of these rules and in many cases they went on to explain why individual rules were important. They mentioned the fact that children copy what they see and that these rules could make children 'a little more responsible' and as a result, 'safe'.

Diet and Nutrition

The document then went on to ask children specifically whether they believed that there should be a rule about the way certain types of food are advertised to children, for example snack food, soft drinks, sweets and chocolates. It also asked whether there should be a rule about violence in children's advertising.

Children's responses on the issue of diet and nutrition were more muted than that of adults. Children showed awareness in their responses of the need for a healthy diet and for exercise. Many children also commented that children are aware of this and that rules about food are not necessary or that parents will 'make sure that children eat proper meals'. There was some discussion as to the need to 'remind' children to eat some things in moderation.

'Yes because they need other food than sweets, at the end of the ad they should be told that they shouldn't eat too much of it.'

Of those who posited rules that should be included, they centred on two main themes: the advertising of 'fast' food and the advertising of 'slimming' foods.

In relation to fast food, children made the point that advertising makes it look like this type of food can be eaten every day, whereas it is something that is a 'treat' or to be eaten in moderation.

'Yes need a rule because they are advertising McDonalds everyday and they never say that it's only meant to be a treat once or twice a week.'

In relation to diet foods or slimming foods, children felt that these should not be on during children's programmes as this might encourage children to diet or worry about how they look.

'Ads for slimming drinks should only be on during adult advertising or advertising fast food should only be on like four times a week and on the ad they should say a treat for the family.'

The use of violence in advertising

With regard to the use of violence in advertising, children believed there should be a rule in the code about this. While views did not vary as to the need for a rule, they varied with regard to the level of restriction that should be placed on violence in children's advertising. Most children felt that no violence should be allowed in children's advertising, as children imitate ads or may be frightened by them. In their responses, children made repeated reference to the impact of such violence on younger children. Other children believed the issue was the time the ad was broadcast and that rather than violence being prohibited from all advertising, it is a

matter of prohibiting it during children’s advertising, especially when young children are watching.

8. Should we ban some things from being advertised to children and young people?

This section in the adult document outlined the current provisions that exist regarding products that are prohibited from being advertised to children or have restrictions attached to the way they are advertised, i.e. tobacco, medicines and alcohol. In presenting this issue to children, they were asked whether some things should be banned from being advertised to children and young people. In order to prompt thinking, examples from products that are banned or restricted in other jurisdictions were given.

The following is a summary of the products identified by children as unsuitable for inclusion in children’s advertising and the reasons, where given.

Product	Why?
Alcohol	Might encourage young people to drink
Cigarettes and tobacco	Might encourage young people to smoke
Slimming products and diets and diet related foods	Might make children uncomfortable about their weight and size
Lottery	
Matches	Dangerous
Medicines and vitamins	Might take them
Razors	Dangerous for younger children, they might copy the advert
Musicians with parental guidance lyrics	Uses bad language
Tampons and sanitary products	Don’t understand what they are for and might make children ask these questions when they are very young
Violent video games	Upsetting for younger children
Scare campaigns	Upsetting for very young children
Condoms and contraception	
Christmas things before Halloween	It’s too early

The basis for many of the suggested prohibitions was the belief that children copy what they see on advertising and therefore may attempt to use products that are

unsafe for them. Children expressed particular concern about younger children and in some cases the suggested prohibitions are based on the perceived potential for the misuse of products by younger children. Therefore, in some cases what children were suggesting was not an outright ban on these products but rather a suggestion that they would not be shown during programmes watched by very young children, especially pre-school children.

The example of the anti smoking campaign – ‘the brain and lungs ads’ - was given by many children as an ad that was upsetting for younger children. In particular, reference was made to children whose parents are smokers and who as a result were frightened that their parents would die. The anti-speed adverts were also cited as being too frightening for very young children. Children did not object to these ads per se and could understand the intent of the adverts, but they did feel that they should not be on during programmes for very young children.

9. How much will it cost? Should there be rules about the way the price of things is put into children’s advertising?

This section is entitled price and purchase terms/comparison claims in the adult document. This deals with the manner in which purchase terms are presented as well as with substantiation of claims by advertisers regarding their product and comparison claims made between products.

In presenting these issues to children the focus was on the way the price of a product is communicated to children in children’s advertising and the language used when presenting the product. Children were asked to consider if they thought it important that children understand the cost of the thing being advertised and secondly if children’s advertising should use terms such as ‘better version’ and ‘new version’.

There was a strong reaction from children to this question. The vast majority of respondents felt that there was a need for a rule about the way the price of a product is put into children’s advertising. A number of issues arose.

Children felt it was important that advertising tells children how much the product costs. However, even adverts that do display the price were criticised on the following basis.

Price presentation

Children mentioned the size of the print used when indicating the price as being too small and on the screen for too short a time.

Misleading pricing

Prices can be displayed in sterling rather than euro, giving children a false idea of how much the product costs.

Children were conscious of the fact that prices can differ between shops, so that a price indicated in an advert may not necessarily be that charged at the shopping outlet nearest to them.

Some respondents drew attention to the fact that young children do not have a concept of the value of money and so the present of prices on screen would not necessarily be effective for them. However, they said that young children understand words such as 'only' and 'just' or other words that seek to convey that the price is affordable. For this reason, these words should not be used in children's advertising.

'Yes because it is false advertising saying it's just 100 euro when really this is a lot of money. Also young children mightn't understand money but they might understand the word cheap or only.'

What's included in the price?

When the product is part of a set of items e.g. Barbie and accessories, the price indicated can be for one product. However, the child may think that they will get everything they see in the advert for this amount.

New and Improved Versions of Products

With regard to advertisements promoting a 'newer' or 'improved' version of a product, the majority of children felt that this was unfair in that it made children who had the old version feel under pressure to get the newer version.

10. The ads are on ... how should advertising be separated from programmes?

The section *Identification, separation, insertion/scheduling of advertising* in the adult document deals with a number of quite technical issues, all of which are subject to specific provisions in the Television without Frontiers Directive. These issues are regarded as particularly important in the context of children's viewing and listening as there has been much debate as to the ability of a child to distinguish advertising from programming content and at what age this ability develops. This in turn is seen as a separate ability to that of understanding the intention of advertising.

These questions were separated out in the children's document and question ten concerned the issue of identification and separation. Children were asked to think about how advertising should be separated from programmes. The issue of the identification of advertising was implicitly included. Children were given three examples of the type of rules that exist in other countries and in Ireland that make it easier to tell the difference between programming and advertising. They were then asked if they thought these were good rules to have in the children's advertising code and why.

These sample rules were:

- An ad should not look or sound like a well-known television or radio programme or film in case people get mixed up.
- People in programmes, for example the presenters, should not talk about a thing so much that really they are advertising that thing but pretending not to.
- Presenters in programmes should not say that they think a thing is very good and that people should get it or use it, as this is really advertising the thing.

Children agreed that there was a need to make sure programming and advertising is clearly separated and they endorsed the sample rules given. In explaining their support for these rules, children made reference again to the issue of characters and presenters from children's programming being included in advertising as this could blur the distinction between advertising and programming.

'Ads shouldn't have famous people in them from television programmes because young children will find it hard to tell the difference and they'd get confused. They should just have normal people or people who aren't as well known in them.'

A small number of children also mentioned that presenters should not endorse products during programmes.

'Radio DJs should not plug, plug, plug.'

11. When should children's advertising be on?

This section in the children's document addressed the issue of scheduling as addressed in the adult document. The issue of scheduling was presented to children as a question about when children's advertising should be on.

Children were told that, in some other countries, if an ad is for something that is connected to a children's programme, for example a toy version of the main character, then it can't be advertised near the time the programme is broadcast. Also, in some countries if advertising has violence in it then it is not put on at a time when small children are watching television.

Children were also told that the 'law in Europe', i.e. the provision within the Television Without Frontiers Directive, says that if a children's programme is on for less than a half hour then it shouldn't have an ad break.

Children were asked whether they thought these were good rules for us to have in the children's advertising code. They were also asked whether they thought the rules should be different for children's advertising that's on when very young children are watching and when older children and young people are watching. This was to get their opinion as to how and whether the code should take cognisance of the predominant age category of the children watching when assessing advertisements.

This question attracted fewer responses from children and there was a wider variety of views expressed in the responses received.

When considering whether children are better able to understand and interpret advertising as they get older, the majority of children said yes.

'Smaller children don't have the same way of knowing whether something is for real or not'.

However, some said that rules are needed for older children also and that the code should apply to all advertising for children of different age groups. In particular, they said that adverts for older children are often on when younger children are watching, and so these adverts should still have to conform to the children's advertising code.

With regard to when children's advertising should be on, most children agreed with the rules outlined in the consultation document and many commented positively on the rule that a programme of less than a half hour duration cannot be interrupted by advertising, especially as children's programmes are often less than half an hour. Some children argued that children's advertising should be broadcast during certain hours and times such as between 10am and 6pm were mentioned.

A number of children raised the issue that adult advertising is on 'during' children's advertising times. In particular, adverts for finance and loans were mentioned, with queries as to why this type of advertising is on when children are watching.

12. There are new ways of advertising. Some of these have not started in Ireland yet but we thought it better to think about them all the same

This section concerns the use of split screen, virtual and interactive advertising. These terms have yet to be defined at EU level, within the context of the revision of the Television Without Frontiers Directive. However, the Commission did not believe that the lack of statutory definitions of these terms at present merited their omission from the children's advertising code. The Commission believed the development of the code should take cognisance of technological developments and the emergence of new advertising techniques, ensuring the code's relevance into the future. It was considered important that the public be made aware of the very

different types of advertising that are being developed, so that the code would not be developed overly premised on traditional forms of television and radio advertising.

In the children's document, these advertising techniques were presented as new ways of advertising that haven't started in Ireland yet. Each technique was explained using a simple example and children were asked if we need rules about these types of advertising and why.

This was obviously a complicated question to consider, given that, for the majority of children (and indeed adults), these ideas are very new. However, most children commented that there should be rules about all advertising, no matter what way it is done.

'Yes because all types of advertising should be clear and not confuse young people and children'

Of the three types of advertising mentioned, virtual and interactive drew the most comment. In particular, children commented that children would be unaware of virtual advertising and that the rule should make sure that people are told this technique is being used. With regard to interactive advertising, children referred back to the issue of privacy and concerns that children might give their contact details to advertisers through interactive advertising.

'I think these types of advertising are a little sneaky. An adult would know fairly quick what the TV stations were up to. But a child or young person would not notice a difference between a live show at a public place or going to the public place. I read this page and I never knew Ireland and other countries did that sort of advertising.'

13. What is a children's programme?

This question is addressed under the heading *Assessment* in the adult document, i.e. how individual advertisements are to be assessed in light of the existence of a new children's advertising code. The Commission has defined children's advertising as that which promotes products, services or activities that are deemed to be of particular interest to children and/or is broadcast during and between children's programmes. Because children's advertising is defined as advertising that is broadcasting during a children's programme, the question arises as to what is a children's programme.

In the children's document this question was presented as "What is a children's programme?" and children were asked if they thought that audience indexing is a good way to check if a programme is a children's programme. This was explained as checking whether there are more children and young people watching a programme than adults and, if there are, then it's called a children's programme.

Therefore advertising shown during this programme would be children's advertising.

It also raises issues around parental responsibility. For example, if broadcasters schedule programmes intended for an adult audience late at night, yet figures show that children are watching these programmes, should they still be classified as children's programming?

Children agreed that the determination of what constitutes a child's programme and what is an adults' programme is not clear cut. Some children in providing examples of a children's programme cited Coronation Street and other soap operas. The majority of children felt that an audience indexing system was a 'fair' way to determine a children's programme. Some, however, also raised difficulties that such a system would encounter, specifically that, while the figures may indicate that children are watching a certain programme, it does not necessarily correlate into it appropriately being called a children's programme.

'Just because children watch it doesn't mean it is suitable for them.'

A small number of children suggested that children's programming should be programming broadcast before 9pm.

14. How should we check if people are obeying the rules in the children's advertising code?

Adults were asked for their views as to the administration and implementation of the code. The section outlined how the BCI currently monitors stations for compliance, what complaint procedures will be in place and how the code will be reviewed.

In framing this section for children the consultation document asked three separate questions that are outlined here under Questions 14, 15 and 16.

Question 14 outlined how the BCI listens and watches recordings from radio and television stations to check that stations are obeying the rules and asked if they thought this is the way we should check that stations are obeying the children's advertising code.

Most children felt that this was an adequate way of monitoring the code. However, a number of children raised the point that this is retrospective and so the offending advert has already been broadcast.

'No there's no point in watching recordings. Instead you should inspect the stations and in this way catch the crime before it is put on air. Also any advertisers who want to show their ad on television must have it checked before it is aired.'

Other suggestions included checking advertisements before they are broadcast, in effect a vetting service within the BCI. Some children mentioned the idea of a committee or council of people who would inspect advertising. Others mentioned the possibility of issuing an annual report that would tell the public how stations had performed and also to let the public know, including children, how to make complaints about advertising.

15. How should the BCI let children and young people know about the children's advertising code?

This question was designed to echo the question asked to adults regarding the complaints procedure and how members of the public can make complaints on the code. It asked children what they thought would be the best way for the BCI to get information to children about the children's advertising code so that they can make a complaint about an ad that they think is breaking the code.

There was a strong response to this question. Children put forward a number of suggestions with regard to how best to publicise the existence of the code to children and how best to encourage them to bring complaints when they noticed breaches of the code.

The main ideas were as follows:

- Make a television ad about the code and broadcast it during children's programming.
- Send information to schools including a leaflet about the code and who to contact if you want to complain about an ad that broke a rule.
- Use TV presenters from children's programmes and the Den TV news.
- Put leaflets in libraries.

What was striking about the responses received was the fact that children expressed a strong indication that they have an interest in receiving information about the code and also in using the code and making complaints.

16. How should we update the children's advertising code?

This question corresponds to that posed to adults regarding the manner and frequency with which the code will be reviewed. Children were asked whether they believed they should be involved in the review of the code and what would be the best way to get their input.

All children who responded to this question said that children should be involved in the updating of the code, as they have been in this consultation phase. A small number of children indicated that the code should be updated more frequently, possibly on an annual basis.

With regard to how best this should be done, responses echoed those in question 15, including the use of surveys and liaison through schools.

Other issues

There were a number of issues, which arose in children's responses that fell slightly outside the questions posed. These are summarised here.

Volume of ads

Some children made reference at various points to the volume of advertising to children, in particular the volume of advertising broadcast during children's programmes. A number of children specifically mentioned that there can be ad breaks during children's programming wherein all the advertising is about food or about toys.

There was some comment regarding the propensity for advertising about toilet fresheners, toilet paper and wipes, with many children commenting that they didn't like these ads, especially when the children shown in the ad were not babies.

'Many ads on toilet air fresheners, toilet paper, toilet wipes use children very close to 11 if not 12. I don't mind small children of about 3 sitting on the toilet but to see a big child doing it is just disgusting.'

Anti smoking campaign

The anti smoking campaign ads drew a lot of attention. Many children referred to 'the ad with the brain being cut' and the ad with 'the stuff getting squeezed out of the lungs'. They didn't object to the ad per se but many commented that it is broadcast when very young children are watching and that it is too shocking for them. An indication perhaps of how this ad is perceived is the fact that it came up many times when children were discussing violence and advertising, as provoking the same fearful reactions from children.

Media Literacy

Another issue that arose from a number of respondents was that of media literacy. Children referred to the fact that as they got older they understood the intent of advertising and that products are made to seem wonderful, although they are not necessarily like that.

'Kids want everything they see, they shouldn't even be advertised to, until they learn about advertising and the methods advertisers use to lure buyers. I learned these in 5th grade.'