



Department  
for Education

# ***Letting Children be Children: Progress Report***

**Report of Progress on the  
Recommendations of the Independent  
Review of the Commercialisation and  
Sexualisation of Childhood by Reg Bailey**

**May 2013**

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## Foreword by Edward Timpson, Minister for Children and Families



This Government has committed itself to making our society more family friendly. We promised to take action to protect children from excessive commercialisation and premature sexualisation. We said we would crack down on irresponsible advertising and marketing, especially to children, and take steps to tackle the commercialisation and sexualisation of childhood.

That's why we asked Reg Bailey, Chief Executive of Mothers' Union, to carry out an independent review and to make robust recommendations. We welcomed Reg's report, *Letting Children be Children*, and his recommendations, to which we said we would review progress after 18 months.

I am pleased to say that there has been good progress against his recommendations. In some cases businesses and regulators have acted quickly and comprehensively, even going beyond what was asked of them. In others a longer term approach is necessary as significant cultural change is required. You will see in this report many instances of the real changes that parents will have seen over the past 18 months. These have come about through the responsible actions of businesses, trade associations and regulators.

In this report, we set out for each of Reg Bailey's recommendations what has happened, what parents should be able to see, and the next steps we want to see taken that will continue this progress and increasingly make it a part of everyday business practice and family life.

At one level, progress can be measured by what has been done to implement Reg's specific recommendations. These emerged from his wider analysis of the pressures on children. So it is encouraging to see that there has been action that has gone beyond many of his original targets.

As a result of the commitment made by businesses and regulators, parents should now, for example:

- See fewer advertisements which use highly sexualised images in public places

- Find that pre-watershed television programming is suitable for family viewing
- Face an unavoidable choice on setting up parental internet controls if they sign up for broadband from one of the five main internet service providers (ISPs)
- Be more likely to find clothes for their children which are age-appropriate in style and design
- Find it easier to complain about advertising, television programmes and videogames that they think are inappropriate for their children to see

This represents substantial progress in a short space of time. Businesses and the regulators have shown the difference that can be made voluntarily, acting on the views and concerns of parents. When the commitment is genuine, regulation isn't needed. Companies that understand and act on the concerns of parents earn the trust of parents. We know that there is more to be done and we will encourage this approach to continue. That is why the Prime Minister has asked Claire Perry MP to advise him on these issues and to work closely with Reg Bailey, myself and other Ministers to help drive forward this agenda.

Parents have demonstrated the power of their voice, but they need to keep telling business what they like and don't like. Parents also need to make responsible choices to help their children have a normal, healthy childhood. This means making use of such things as the age ratings for films, DVDs and videogames, the television watershed, and parental controls on the internet.

Businesses need to play by the written and unwritten rules to do the right thing by parents. There are guiding principles of right and wrong – like not exploiting children's gullibility and vulnerability, or encouraging peer pressure – that stand the test of time however technology and business models change. Children deserve to be treated in ways that are respectful of their integrity and personal development. This means not treating them solely as consumers or confronting them with a limited range of gender roles and highly idealised stereotypes of body sizes and shapes. It means not pushing them towards an adult sexuality at a pace they find bewildering. In short, those in business should not promote things for other people's children that they would not accept for their own. We think that these things can be done voluntarily and within the existing regulatory frameworks. However, we shall continue to follow closely the progress that is being made and, if necessary, we will look at introducing statutory regulation if effective voluntary action is not forthcoming.

In an age when it is becoming even harder to let children be children, we need more than ever, whether as a business or as a parent, to take responsibility for shaping the family friendly society in which we want our children to grow up in. We have made important progress in recent years but there is still more to do.

**Edward Timpson MP**

**Minister for Children and Families**

## Foreword by Reg Bailey CBE



My review of the commercialisation and sexualisation of childhood, *Letting Children be Children*, recognised that many parents were feeling simply overwhelmed by the increasing levels of sexual imagery and commercial messages reaching their children. These commercial pressures beat down on every one of us. Back then, we noted that if adults needed to be emotionally and otherwise well-adjusted to deal with this environment, then so much more so do children.

I wanted to understand the nature of these pressures on our children and young people. I wanted to understand too why so many parents seem to lack confidence in their ability to help their children navigate this commercial and sexualised world. Most of all I wanted to bring forward some clear and straightforward suggestions to address these issues and ensure we provide the right sort of support for parents and children alike.

I argued that three things would need to happen for there to be a good outcome from this review.

First, parents need to feel that their concerns are heard and taken seriously. Parents recognise that they should be the ones to set the standards that their children live by but they need more support. In particular, they need businesses and others to work with them, not against them.

Second, although many businesses and broadcasters are already doing a good job in working with parents and only selling things for and to children that are appropriate for them, there were those who are not. I hoped that they would recognise the need to step up and be as good as the best, being more proactive in encouraging feedback and complaints. When it came to inappropriate advertising and marketing, I wanted all businesses to play fair when selling to children and not take advantage of gaps in the regulation, especially regarding new media.

Third, I hoped that our regulators would work consistently to connect with parents and recognise that parents should have a much larger say in what is appropriate or desirable for their children to see and hear.

Although parents wanted to take the initiative, they wanted, quite rightly, businesses to behave more responsibly to support them in being parents. This is why I aimed for practical, straightforward recommendations for action that could be taken by industry. Taking forward these actions would show that businesses could act responsibly to protect children without the need for regulation from Government.

Since the publication of my report, I have been pleased to see that many parts of industry have risen to the challenge, with good progress made against many of the actions I recommended. For example:

- ParentPort was launched to make it easier for parents to lodge a complaint with the media regulators.
- Action has been taken on over-sexualised on-street advertising.
- Most responsible retailers have signed up to and adhere to the Responsible Retailing Code of Practice for children's clothes.
- Major brands have agreed to ban the use of children as brand ambassadors and in peer-to-peer marketing.
- The five main internet service providers (ISPs) now offer parental safety controls to their new customers to help parents prevent their children seeing inappropriate material online.

The initial evidence suggests that these actions may be starting to have the intended impact on outcomes, and I would like to express my thanks to all those in industry, regulatory bodies and Government who have worked hard to implement the changes I recommended. But we cannot afford to be complacent on these issues. In some areas, progress has been slower than I would have liked with some industries failing to get to grips with the spirit of the challenges presented in my report. I want to see businesses and regulators embedding the protection of children more fundamentally into their practices and procedures so that the spirit of *Letting Children be Children* continues to shape the way they work, even after all the recommendations in that document have been achieved and technology has moved on.

An opportunity now exists for industry to work more closely with voluntary and community sector bodies with an interest in these issues. I have seen some excellent examples of how charities have moved beyond awareness raising and have worked with businesses to become part of the solution, advising and supporting industry to help develop more 'family friendly' policies and products. There is considerable scope for more such action in future.

I remain firmly of the view that while businesses, regulators and Government can create a supportive environment, parents must still be parents and bear the main responsibility for the healthy development of their children. Parental controls for internet services are

ineffective if parents don't use them, age-rating systems are meaningless if parents ignore them.

By continuing to focus on supporting parents to do their job, I believe we can all make sure that children are allowed to be children.

**Reg Bailey CBE**

## The recommendations of Letting Children be Children

In *Letting Children be Children*, Reg Bailey made 14 recommendations, of which only two were directed at Government (Recommendation 4, to consult on exemptions from the Video Recordings Act 1984 and 2010, and Recommendation 14, to take stock of progress against the recommendations in his review in 18 months' time). The other 12 recommendations were directed at businesses, trade associations and regulators.

In the following sections we have assessed the progress made on each of Reg Bailey's recommendations. For ease of reference, the exact wording of his recommendation is given at the start of each section.

### Recommendation 1 - Ensuring that magazines and newspapers with sexualised images on their covers are not in easy sight of children

Retail associations in the news industry should do more to encourage observance of the voluntary code of practice on the display of magazines and newspapers with sexualised images on their covers. Publishers and distributors should provide such magazines in modesty sleeves, or make modesty boards available to all outlets they supply and strongly encourage the appropriate display of their publications. Retailers should be open and transparent to show that they welcome and will act on customer feedback regarding magazine displays. *ACTION: Publishers, distributors, retailers and retail associations in the news industry, including the National Federation of Retail Newsagents and the Association of News Retailing*

#### What has happened

*Letting Children be Children* noted that although the news retailing industry had a voluntary code of practice on the display of magazines, which larger retailers were more likely to be able to follow than the many thousands of smaller retailers with space constraints, more needed to be done to secure compliance with the code.

Industry bodies have made some progress on this. The publishing industry's guidelines on the display of magazines have been refreshed to address public concerns and copies have been distributed to 30,000 retail outlets. The guidelines were also published on the [ParentPort](#) website to make them more accessible to parents. Modesty boards have been designed and produced by the Professional Publishers Association (PPA) and made available to retailers on request, although take up so far has been low.

We are disappointed that, despite this effort on the part of industry associations, compliance with the industry display guidelines has been patchy so far. However, the Association of Convenience Stores (ACS) and the PPA have committed to further action which will help take magazines with sexualised images on their covers out of easy sight of children.

Retailers, especially smaller ones, tend to take notice of the tools provided by their trade associations to help them make their businesses efficient and profitable. We therefore welcome the publication and distribution by the ACS of a new [best practice pictorial guide](#) for convenience retailers on how to display men's lifestyle magazines, similar to those already in use for the display of tobacco. The new advice guide, based on the existing code of practice, can be used as a training guide for stores on, for example, where to locate men's lifestyle magazines on shelves, how to check compliance with the code, and how to communicate with customers and respond to their concerns.

## What parents should see

Parents should not see newspapers or magazines with sexualised covers, such as those of men's lifestyle magazines, displayed next to children's titles and comics, at children's eye-level or below, or within easy reach of children. Where space constraints in a store mean it is not possible to display such magazines elsewhere, they should have their front covers partially covered by other magazines.

If a store is still unable to display magazines in line with the industry guidelines, modesty boards are available free of charge to retailers and we would expect them to respond positively to any concerns that parents may have and make any necessary changes to their display.

## Next steps

To support their new guide, ACS has also said they will develop, working with parent and consumer organisations, information for parents on what to expect in store and how to go about raising a concern. We expect to see this new guidance in spring 2013, and it will be made available to parents on the [ParentPort](#) website.

We also welcome moves from the PPA to feature a revised 'planogram' for the display of magazines in its booklet 'Making More Money from Magazines' when it is reprinted this spring. This will ensure that men's lifestyle magazines are not located close to titles that may appeal to children and young people, such as video game and computer magazines, and in a way that seeks to prevent customer complaints. The PPA will at the same time reissue the industry guidelines on the display of men's lifestyle magazines.

## Recommendation 2 - Reducing the amount of on-street advertising containing sexualised imagery in locations where children are likely to see it

The advertising industry should take into account the social responsibility clause of the Committee of Advertising Practice (CAP) code when considering placement of advertisements with sexualised imagery near schools, in the same way as they already do for alcohol advertisements. The Advertising Standards Authority (ASA) should place stronger emphasis on the location of an advertisement, and the number of children likely

to be exposed to it, when considering whether an on-street advertisement is compliant with the CAP code. The testing of standards that the ASA undertakes with parents (see Recommendation 7) should also cover parental views on location of advertising in public spaces. *ACTION: Advertisers, advertising industry bodies, and the ASA*

## What has happened

We are pleased to acknowledge the very good progress made by the ASA and the advertising industry on this recommendation. During autumn 2011, the Children's Panel established by the Advertising Association (AA) worked with the Outdoor Media Centre (OMC), ISBA (the Voice of British Advertisers), the Institute of Practitioners in Advertising and cosmetics companies to publicise guidance to the industry on sexual imagery in outdoor advertising. In October 2011, the ASA issued a warning statement to the industry setting out its intention to apply the criteria for imagery in outdoor advertising more stringently.

In April 2012, the Committee of Advertising Practice (CAP) published further guidance for advertisers based on the ASA's initial adjudications. The CAP Copy Advice service continues to receive numerous queries from advertising agencies and media owners for pre-publication advice. These queries, predominantly from advertisers of clothing, fragrances and outdoor media owners, have shown an increasing understanding of what is acceptable and a willingness to comply with the guidance.

The OMC has also taken action. It commissioned research into parents' concerns through the independent think tank Credos, distributed the ASA creative guidelines to members, and published these in a new "Sexualised Imagery" section on its website. The OMC also altered its charter to require advertisers to show caution in placing advertisements near sensitive locations and to pre-vet advertisements for sex shops, lapdancing clubs and similar establishments, and reissued the ASA creative guidelines to all its members in November 2012. The OMC database of poster sites was refreshed so that their proximity of sites to schools was brought up to date.

## What parents should see

Parents should now see fewer advertisements in public places which use highly sexualised imagery. The ASA has banned a number of advertisements for toiletries and lingerie that failed to meet the requirements of its tougher line on the use of sexual imagery.

Research commissioned by the ASA on sexual imagery in outdoor advertising (see Recommendation 7) suggests that the public, including parents, believe the line on what is acceptable has been drawn correctly. More recent data from the OMC shows that since the new guidelines were issued, total complaints about outdoor advertising are down 41 per cent in volume and by seven per cent in the number of campaigns

complained about. Outdoor advertising is now the fifth most complained about medium, with one tenth the level of complaints of television or internet advertising.

## Next steps

We would like the ASA to continue to apply this stricter line on the use of sexual imagery in outdoor advertising, and to continue to test public opinion, especially that of parents, in deciding the standards to be applied in outdoor advertising to minimise the risk of causing harm and offence. We also welcome moves by the ASA to expand its schools engagement programme. This was launched in November 2012 with Ad:Check, (see Recommendation 7). This could provide a useful two-way feedback mechanism through which the ASA can help ensure its decisions best reflect the views of parents and children.

We would like the OMC to continue to raise awareness of these issues among its members and to require pre-vetting of advertising for sexual services. We also expect the OMC to follow through on its commitment to ensure that sexualised imagery is mentioned in all training sessions for its members.

## Recommendation 3 - Ensuring the content of pre-watershed television programming better meets parents' expectations

There are concerns among parents about the content of certain programmes shown before the watershed. The watershed was introduced to protect children, and pre-watershed programming should therefore be developed and regulated with a greater weight towards the attitudes and views of parents, rather than 'viewers' as a whole. In addition, broadcasters should involve parents on an ongoing basis in testing the standards by which family viewing on television is assessed and the Office of Communications (Ofcom) should extend its existing research into the views of parents on the watershed. Broadcasters and Ofcom should report annually on how they have specifically engaged parents over the previous year, what they have learnt and what they are doing differently as a result. *ACTION: Ofcom, broadcasters*

## What has happened

Reg Bailey found that some parents were concerned by the sexualised content of some pre- and cross-watershed television programming. There was a feeling that broadcasters were increasingly pushing the boundaries on what was considered acceptable for family viewing. Coincidentally, his review was launched in the same week that the final of the 2010 'X-Factor' competition was broadcast, featuring performances by Christina Aguilera and Rihanna that drew hundreds of complaints to Ofcom, the regulator for broadcast TV and radio.

In September 2011, Ofcom published new guidance for broadcasters on compliance with the television watershed, which for the first time included a specific focus on transitional

material shown immediately before and after 9.00pm. Broadcasters helped develop these guidelines and have worked to ensure their staff, and those they commission programmes from, understand and comply with them. These guidelines are refreshed and updated regularly.

Ofcom has increased the amount of research it conducts with parents to understand their views and concerns about pre-watershed programming. This research will be repeated on an annual basis and will help inform future versions of the guidance. All broadcasters we spoke to during this process told us they also have systems in place, either through standing 'viewer panels' or regular stand-alone research, to understand the attitudes and expectations of their viewers, and parents in particular. This insight is used to inform editorial judgements on the commissioning, production and content of pre- and cross-watershed programming.

We note that Ofcom continues to act in its statutory enforcement role and investigate potential breaches of the Broadcasting Code involving the watershed and the protection of children. Some of these potential breaches have involved programmes originally broadcast post-watershed being repeated during daytime programming. In one case, this has resulted in the imposition of a £40,000 fine on the broadcaster responsible.

## **What parents should see**

The 9.00pm watershed continues to be well understood and used by parents to help them make sure the television programmes their children watch are suitable for family viewing. Ofcom's new guidance for broadcasters means that parents and their children are less likely to be confronted by sexual material or swearing before, or immediately after, 9.00pm.

Ofcom's increased focus on enforcing the watershed appears to be having a positive effect. Research for this progress report was carried out by TNS in September 2012. This omnibus survey repeated the questions used for the research for *Letting Children be Children* in February 2011. Parents were asked if they had seen pre-watershed programming or adverts that they thought were unsuitable or inappropriate for children to see because of sexual content in the previous three months. The 2012 omnibus survey found that 63 per cent of parents said they had not, an increase from 58 per cent from the same survey in February 2011.

## **Next steps**

We welcome the steps which have been taken by Ofcom and broadcasters and expect them to continue the dialogue they have begun with parents. We also expect the family viewing guidelines, supported by corresponding enforcement activity from Ofcom, to be subject to periodic review in order to reflect parental views, and broadcasters to work within the spirit of the Code as much as to the letter.

New technology means that programmes originally commissioned and shown after the watershed are increasingly available 'on demand' through a variety of platforms. We would expect broadcasters to build on their work to date to ensure parents can protect their children from viewing inappropriate material originally broadcast post-watershed through on demand services, for example through PIN password protection, and to raise awareness amongst parents that such tools exist.

## Recommendation 4 - Introducing Age Rating for Music Videos

Government should consult as a matter of priority on whether music videos should continue to be treated differently from other genres, and whether the exemption from the Video Recordings Act 1984 and 2010, which allows them to be sold without a rating or certificate, should be removed. As well as ensuring hard copy sales are only made on an age-appropriate basis, removal of the exemption would assist broadcasters and internet companies in ensuring that the content is made available responsibly. *ACTION: Government*

### What has happened

The sexualised content of some music videos, and the exemption to the Video Recordings Act (1984 and 2010) which allowed children to purchase them, was widely criticised by contributors to *Letting Children Be Children*.

On 9 May 2012, the Government launched a consultation to ask whether changes should be made in relation to the exemptions from statutory classification set out in the Video Recordings Act. The consultation closed on 1 August 2012. It drew more than 30 formal submissions, including from third sector organisations, trading standards bodies, trade associations and the UK's two designated classification authorities, the British Board of Film Classification (BBFC) and the Video Standards Council (VSC).

The Government published its response on 22 May 2013. In doing so, it set out plans to lower the exemption threshold so that more hard-copy video material in the music, sports, religious and educational genres must be age-rated in future but those likely to be suitable for younger children (that is, under the age of 12) will remain exempt. The Government intends to revise statutory legislation to bring these changes into effect from April 2014.

### What parents should see

Parents should be able to see clear and trusted age-rating information on hard-copy media, such as DVDs and Blu-ray Discs, of material that is suitable for viewers 12 years old and above. This will ensure that they can make an informed decision about what content they allow their children to see.

## Next steps

Although amendments to the Video Recordings Act will only directly affect music videos and other material sold in hard-copy, such as DVD and Blu-ray discs, respondents to the consultation felt that more needed to be done to tackle access to inappropriate online content by children as sales of physical video works decrease in favour of online video.

Whilst the consultation set out to determine whether changes needed to be made to the age rating of content distributed on recordable media, many of those responding took the opportunity also to call for more consistent adoption of classifications and labelling for online content so that consumers are better informed about products and to empower parents to make more confident decisions about what is or is not suitable for their children.

Responses to the consultation indicated that increasing numbers of digital distributors and content producers are signing up to voluntary systems such as BBFC Online or are offering their own content labels, such as the Parental Advisory Scheme that the UK music industry, under the leadership of its trade association the BPI, has introduced. We welcome this but believe that far more can be done and recognise that there is an urgent need for greater dialogue with industry on the issue.

## Recommendation 5 - Making it easier for parents to block adult and age-restricted material from the internet

To provide a consistent level of protection across all media, as a matter of urgency, the internet industry should ensure that customers must make an active choice over what sort of content they want to allow their children to access. To facilitate this, the internet industry must act decisively to develop and introduce effective parental controls, with Government regulation if voluntary action is not forthcoming within a reasonable timescale. In addition, those providing content which is age-restricted, whether by law or company policy, should seek robust means of age verification as well as making it easy for parents to block underage access. *ACTION: Internet industry and providers of age-restricted content, through the UK Council for Child Internet Safety (UKCCIS)*

## What has happened

There has been good progress against this recommendation. UKCCIS embraced the approach recommended by the Bailey Review, that parents should have an unavoidable choice to make in their children's internet access. Through the Ministers that chair the UKCCIS Executive Board, we have urged the adoption of family-friendly internet access throughout the internet industries, including with internet service providers (ISPs), public WiFi providers, retailers, device manufacturers and mobile internet services.

The code of practice agreed by the four main fixed-line ISPs (BT, Sky, TalkTalk and Virgin Media) has had the most public attention. These ISPs published a code of

practice in October 2011, promising that all new customers would be offered an active choice, free of charge, on parental controls by October 2012. These four ISPs, together with Everything Everywhere, have gone further still, committing to provide whole-home filtering solutions to protect all devices in the home and will make setting up internet controls an unavoidable step for parents. If parents choose not to engage with that step (for example, if they just repeatedly click 'yes' to get through set-up quickly) then that would lead to protection being on rather than off. The ISPs have made a commitment to put in place appropriate measures to ensure that the person setting up parental controls is over 18.

Other internet businesses have also taken action. For example, among retailers, Argos offers free parental controls software to anyone who wants it, whether they are a customer or not. During 2012, retailers such as Dixons Group and John Lewis, trialled in-store activities to encourage customers to consider parental controls when purchasing new devices. Tesco has also put in place a system to provide internet safety advice on the back of till receipts when an internet enabled device is purchased. Public WiFi is being addressed as part of a project agreed by the UKCCIS Executive Board. It is taking comprehensive look at public WiFi and will build on other work, such as the Mumsnet Family Friendly WiFi programme.

## **What parents should see**

Parents that sign up as new customers for broadband from one of the five main ISPs should find that they face an unavoidable choice in setting up parental internet controls. Increasingly, existing customers of these companies should also receive a similar offer.

- BT introduced its parental controls solution for customers installing home broadband in April 2012. Customers face an unavoidable choice of whether to install parental controls or not, and can download and tailor a variety of tools to meet the needs of their children. BT regularly contacts its customers about online safety and reminds them about the availability of free parental controls.
- Sky has presented all new customers with an unavoidable choice since October 2012, with parental controls highlighted as the default option. The company is also communicating with existing customers on the existence of parental controls and claims nearly 90 per cent of customers are aware of them.
- TalkTalk introduced its network-level parental control service in May 2011, enhanced in March 2012 to ensure new customers were provided with an unavoidable choice of whether to switch on parental controls or not. The company say that one in three new customers takes up the offer, roughly equivalent to the proportion of households with dependent children, and 60 per cent of those say they wouldn't have done so without prompting during the installation process.
- Virgin Media introduced free device-based software for users to install on home PCs in December 2011, and an unavoidable choice on installing parental controls software during installation of home broadband was introduced in October 2012.

The company is now communicating with its existing customers on the availability of parental controls.

- Everything Everywhere has joined the UKCIS parental controls working group and also now offers parental controls to new and existing customers.

Many of the major public WiFi and mobile internet service providers also provide filtered services. Virgin Media blocks adult content on the public WiFi services they provide in London Underground stations, O2 provide filtered services in McDonald's restaurants, Sky introduced automatic filtering of adult content through its WiFi service, 'The Cloud', and BT now provide filtered WiFi in all Starbucks coffee shops, a service which is now being offered to their other business customers.

We know that all UK mobile operators (T-Mobile, Orange, Telefonica UK (O2), Three, Vodafone) filter adult content on pay-as-you-go mobile phone purchases.

## Next steps

Children's use of the internet is an absolutely critical area where they encounter both the commercial world and the pressures towards premature sexualisation. Whilst recognising the progress that has been made by many businesses in developing a range of tools and techniques to help keep children safe online, we also recognise that the internet is a constantly growing and evolving environment, with huge amounts of content added every day. People will continue to find new ways to use, and abuse, the communication possibilities the internet offers. Therefore, we need to be constantly active in ensuring the approach to child internet safety evolves and grows too. The findings from the consultation on parental internet controls showed that the great majority of parents accept that keeping their children safe online is their responsibility, or a shared responsibility with businesses.

We are encouraged by evidence from the five big ISPs that they will be extending and strengthening their parental controls approach and developing new educational initiatives for parents and young people. However, we are also clear that ISPs are not the only businesses with a role to play. We will press all the ICT industries, including retailers and device manufacturers, to develop universally-available family-friendly internet access which is easy to use. For example, we expect there to be active encouragement to use parental controls provided on new devices such as desktops, laptops and smartphones as they come to market.

Good progress has been made on ensuring that public WiFi is family-friendly, but we want to see a firmer commitment from WiFi providers and the retail and hospitality sectors to reassure parents that pornography will not be accessible in public places where their children visit.

Age verification of young people under the age of 18 is a complex problem which requires a global solution. We have made grant funding available to stimulate progress

on this issue and will continue to seek a robust solution with industry and voluntary sector partners.

Our plans to drive progress on this area are set out in more detail in the “Further Action” section of this report.

## Recommendation 6 - Developing a retail code of good practice on retailing to children

Retailers, alongside their trade associations, should develop and comply with a voluntary code of good practice for all aspects of retailing to children. The British Retail Consortium (BRC) should continue its work in this area as a matter of urgency and encourage non-BRC members to sign up to its code. *ACTION: Retailers and retail associations, including the BRC*

### What has happened

Retailing to children was a particular concern raised in the call for evidence to *Letting Children be Children*. Principally, the concern centred on products that were seen to depend on, or promote, the idea that young girls are more sexually mature than their age suggests. The kind of clothes and accessories most often mentioned were bras, bikinis, short skirts, high heeled shoes, the use of sexually suggestive slogans, and the use of fabrics, such as lace, and designs, such as low necklines, more usually associated with adult sexuality. A second area of concern was gender stereotyping, whether through colour ranges in clothes, the types of clothes available, and the gendered nature of toys and games.

The BRC was one of the first organisations to offer a practical measure to address parents’ concerns about premature sexualisation. Its members developed and agreed a set of voluntary, good practice guidelines for retailing children’s clothes, releasing them on the same day *Letting Children be Children* was published. Initially adopted by BRC members covering around 40 per cent of the children’s clothes market. At the time of writing more BRC members have adopted the guidelines so that around 51 per cent of the market by sales volume is now covered. Mostly the guidelines are used purely within companies to inform their decisions on what clothes are offered for sale, although there have been some collaborative initiatives, such as Tesco’s work with Mumsnet to design a range of first bras. The BRC reviewed those guidelines after a year in operation and has amended them accordingly so that they now include advice on boys’ clothes and the avoidance of gender stereotyping. The progressive nature of this work has been recognised internationally, and the BRC is now advising several European Governments and retail bodies to help them develop similar sets of guidelines.

## What parents should see

Many retailers who are BRC members are using the guidelines to inform decisions about the style and design of the children's clothes they put on sale. Parents should therefore find fewer instances of age-inappropriate clothes in these shops.

Findings from the TNS omnibus survey carried out for this progress report suggest that it may be getting easier for children and their parents to find clothes they both like. The survey asked children whether they agreed that "it's difficult to find clothes in the shops that I like and that my parents would allow me to wear". The proportion of children who agreed dropped from 48 per cent in 2011 to 40 per cent in 2012, and the proportion disagreeing rose from 38 per cent in 2011 to 47 per cent in 2012.

## Next steps

We regard the good practice guidelines on the retail of children's clothing as an excellent first step, but we recognise that they are not sufficient on their own. Although the BRC is seeking to recruit new signatories to the childrenswear guidelines, this will largely mean smaller companies joining the initiative, so growth in coverage of the market by BRC members using the guidelines is likely to be slower in future. However, there are other large clothes retailers outside BRC membership. Primark also uses internal guidance similar to the BRC guidelines, and we would like to see progress made by all retailers of children's clothes on this issue.

We also welcome the proposal from the BRC to work with its members to explore the development of a more comprehensive set of guidelines covering the retailing of toys and games, gender stereotyping and body confidence.

## Recommendation 7 - Ensuring that the regulation of advertising reflects more closely parents' and children's views

The Advertising Standards Authority (ASA) should conduct research with parents and children on a regular basis in order to gauge their views on the ASA's approach to regulation and on the ASA's decisions, publishing the results and subsequent action taken in their annual report. *ACTION: ASA*

## What has happened

Reg Bailey's review recognised the increasing volume of commercial messages aimed at children, including through new media, and called for advertisers to continue to act responsibly when communicating with young people. To ensure adequate controls were in place, Reg argued, the ASA should regularly seek the views of parents and children to ensure its regulatory judgements reflect public attitudes.

ASA's research on harm and offence in advertising, conducted by Ipsos MORI, was published in July 2012. This UK-wide research assessed the views of the general population, parents and children specifically. The ASA is currently assessing the detailed results which will feed in to the organisation's decision making.

ASA has gone further in actively engaging with parents and young people to understand, and respond to, their views and concerns on advertising. In November 2012, the regulator successfully launched Ad:Check, a new resource for use in secondary schools, as part of its broader schools engagement programme. Ad:Check allows young people to engage with real life advertising case studies to help them explore topical and controversial issues within the context of their rights, responsibilities, duties and freedoms, and to make critical assessments of the advertisements they see and hear.

Alongside the work led by the ASA, the advertising industry itself, through the leadership of the Advertising Association, has engaged with parenting groups, parents and young people to ensure public attitudes are understood and reflected in advertising practice.

## What parents should see

Parents should increasingly see that the advertising their children might see or hear, in whatever media, is appropriate for children and unlikely to cause harm or offence. In cases where parents think an advertisement breaks the rules, they should find it easy to make a complaint, either directly to the ASA or through ParentPort.

## Next steps

We are pleased with the progress made by the ASA, and the broader industry, in its engagement with parents and young people, and we are confident that the research already conducted will be repeated, and published, as necessary. We welcome moves by the ASA to explore the possibility of making the Ad:Check resource a two way process, so that the ASA's decisions, rulings and positions on key issues best reflect the views of children and parents. To make the best use of its resources, the ASA will phase in these additional elements as resources allow.

## Recommendation 8 - Prohibiting the employment of children as brand ambassadors and in peer-to-peer marketing

The Committee of Advertising Practice (CAP) and other advertising and marketing bodies should urgently explore whether, as many parents believe, the advertising self-regulatory codes should prohibit the employment of children under the age of 16 as brand ambassadors or in peer-to-peer marketing – where people are paid, or paid in kind, to promote products, brands or services. *ACTION: Committee of Advertising Practice, the Advertising Association and relevant regulators*

## What has happened

Following the publication of *Letting Children be Children*, the Advertising Association established the Children's Panel. The Panel developed a voluntary code through which signatories pledged not to use under-16s in peer-to-peer marketing or as brand ambassadors – practices which Reg Bailey had found were concerning to many parents. A number of well-known brands have signed-up to this pledge, including Coca-Cola, Microsoft and Vodafone, as well as several trade associations, such as the British Toy and Hobby Association.

In January 2012, CAP launched a review of the employment of children for the use of these marketing techniques to determine whether such a ban should be formally incorporated within the UK Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing (CAP Code). CAP published its formal response to this consultation on 20 December 2012. The evidence suggested that new, stricter guidelines were needed for advertisers on this issue, rather than a ban. CAP published that new guidance for marketers to ensure that such techniques are used responsibly and in accordance with the CAP Code on 28 February 2013.

## What parents should see

Parents should find that there is a much smaller chance that their children may be approached by companies to recruit them to sell or promote products, or that their children's friends may be promoting goods or services to them.

## Next steps

We welcome the new guidance to marketers from CAP which should help marketers abide by the rules of the CAP Code. Additionally, we would like to see more companies commit to the voluntary ban promoted by the AA and for the voluntary arrangements to be rigorously observed.

## Recommendation 9 - Defining a child as under the age of 16 in all types of advertising regulation

The ASA should conduct research with parents, children and young people to determine whether the ASA should always define a child as a person under the age of 16, in line with the Committee of Advertising Practice and Broadcast Committee of Advertising Practice codes. *ACTION: ASA*

## What has happened

*Letting Children be Children* recognised the concerns some parents had about online behavioural advertising (OBA) being used to target children, and welcomed the introduction of the European Advertising Standards Alliance Best Practice Recommendation on this type of marketing. Reg Bailey was concerned that this recommendation would only apply to children under the age of 13 and suggested the ASA looked more closely at the issue of advertising to under-16s more broadly.

The ASA included the question of whether all children should have exactly the same level of protection up to the age of 16 within the research it commissioned from Ipsos MORI on harm and offence in advertising (see Recommendation 7). Separately, the CAP and the Broadcast Committee of Advertising Practice (BCAP), which define the codes governing advertising, conducted a separate policy analysis of rules in the codes relating only to pre- or primary school age children and the underpinning rationale for their application to this age group alone.

The findings of both pieces of work suggested there was little justification or public appetite to change the existing rules. The CAP and BCAP codes both already define a child as anyone under the age of 16. However, they also include enhanced protections for young children which, if applied to all young people below the age of 16, would likely be seen as disproportionate. Broadening this level of protection to all children could, counter-intuitively, prevent adverts for goods or services that can improve outcomes for teenagers, such as condoms, being shown in slots adjacent to programming likely to appeal to them. The ASA's qualitative research suggested that most adults, whether parents or not, felt children of different ages needed different types of protection: in effect, supporting the flexibility offered by the current ASA system. We recognise the difficulties associated in separating out the interests of children aged 13-16 from those of older teenagers and young adults in order to guarantee that children will not receive targeted advertising for certain goods or services. We therefore welcome the new 'transparency and control' rules for OBA which came into effect on 4 February 2013, enforced by the ASA, which will ensure clearer information for consumers and give them the opportunity of opting out of receiving OBA on their web browser.

## What parents should see

All children under the age of 16 will continue to be subject to protection from the existing regulatory system, with enhanced protections for younger children. The advertising that children see on the internet will continue to be age-appropriate to the websites they visit. Where websites, such as social networking sites, offer a differentiated service for younger users, children are less likely to see advertising intended for adults if they have set up a user profile which includes their correct age.

## Next steps

We would expect the ASA to keep the issue of advertising to people under the age of 16 under review in light of emerging techniques and new technology and to enforce the OBA rules.

## Recommendation 10 - Raising parental awareness of marketing and advertising techniques

Industry and regulators should work together to improve parental awareness of marketing and advertising techniques and of advertising regulation and complaints processes and to promote industry best practice. *ACTION: Advertising and marketing industry, with the ASA and the Advertising Association*

### What has happened

Research for *Letting Children be Children* found that while parents were generally comfortable with the advertising techniques used in familiar media such as television, print and on-street, they were more anxious about unfamiliar techniques in the new online media. Reg Bailey recognised that, the greater parents' awareness of advertising and marketing techniques and regulation, the better equipped they would be to help their children navigate the plethora of commercial messages they receive. While parents were felt to be increasingly 'digitally literate', gaps in their understanding and awareness of some of the newer techniques employed were apparent. Results of the September 2012 TNS Omnibus Survey suggest that parents are more likely to disagree with the use of certain methods to target children, such as 'advergames' (interactive online games featuring a brand or product) or peer-to-peer marketing, than they were in 2011.

ParentPort includes a plain-English description of the roles of all the media regulators, including the ASA, and the complaints processes. Alongside this, ASA has established a 'parents' page' on its website and created an e-leaflet, both of which aim to improve parental knowledge of the regulatory landscape. Plans are being developed to increase awareness of both the parents' page and ParentPort (see recommendation 12).

Industry bodies, the AA, ISBA and the Internet Advertising Bureau, commissioned Media Smart to produce a 'parent pack' to raise parents' awareness and knowledge of online advertising techniques. The '[Digital Advise Parent Pack](#)', paid for by industry and developed with input from Reg Bailey, the Family and Parenting Institute (FPI) and Dr Agnes Nairn, a leading academic on the commercialisation of childhood, was launched in November 2012, with the endorsement of Edward Timpson MP, Minister for Children and Families.

## What parents should see

Parents can now access a range of information to help them develop their understanding of marketing and advertising techniques, including those described above. This should allow parents to help their children understand the commercial landscape better.

## Next steps

We are pleased to see both the advertising industry and regulator taking their roles seriously. We expect to see both parties developing clear plans for raising the awareness of parents of the resources now available to them in this field.

As a form of advertising, ‘advergames’ fall within the scope of the existing Code. However, we welcome the work of the FPI (Family and Parenting Institute – now the Family and Childcare Trust) to raise awareness of this technique among parents and are pleased that the ASA are working with FPI to clarify further what is acceptable in this area.

## Recommendation 11 - Quality assurance for media and commercial literacy resources and education for children

These resources should always include education to help children develop their emotional resilience to the commercial and sexual pressures that today’s world places on them. Providers should commission independent evaluation of their provision, not solely measuring take-up but, crucially, to assess its effectiveness. Those bodies with responsibilities for promoting media literacy, including Ofcom and the BBC, should encourage the development of minimum standards guidance for the content of media and commercial literacy education and resources to children. *ACTION: Media and commercial literacy providers, with Ofcom and the BBC*

## What has happened

A panel led by Professor David Buckingham which reviewed the commercialisation of childhood, reported that children are neither ‘helpless victims’ of the media and commercial world nor ‘autonomous media-savvy consumers’. The report argued that children’s experience of the commercial world is mediated by their social relationships with family and friends. Children develop a commercial and media literacy that can be improved, as with other fields of literacy, by education and learning programmes. However, Reg Bailey was unconvinced: simply undertaking a course would not be enough to provide sufficient protection. Children could learn how models are used in advertisements, for example, but still be upset by their own ‘failure’ to match up to a certain stereotype of beauty. There were many media literacy products available, but evaluation of their effectiveness was needed. Reg Bailey asked Ofcom and the BBC to develop minimum standards.

Ofcom was one of the organisations that participated in the UKCCIS project to develop the universal child internet safety guidelines. This initiative not only supplied clear guidance on the media literacy messages that industry should be communicating to children and parents but also provided high quality media literacy material for use by any company or organisation with an online presence that wishes to use it. The BBC, for example, uses these messages in their latest media literacy materials.

## What parents should see

More media literacy materials aimed at parents and children are being made available, such as those produced by [Media Smart](#). However, the impact of this kind of education ideally needs to be evaluated over the longer term to measure its effectiveness.

## Next steps

We think Ofcom in particular has made some useful progress in both evaluating the effectiveness of media and commercial literacy materials. However, we recognise that this is likely to need action over the long term to become embedded in the practice of providers of educational materials. Moreover, the effectiveness of some materials in protecting children from harm might not be observable for a number of years, particularly in relation to children's online media and commercial experience for which the evidence base is relatively undeveloped. We would, therefore, like to see Ofcom and the BBC continue to promote media literacy and establish the standards for effective materials so that educators have access to the best products and children are better able to develop the knowledge and resilience they need.

## Recommendation 12 - Ensuring greater transparency in the regulatory framework by creating a single website for regulators

There is a variety of co-, self- and statutory regulators across the media, communications and retail industries. Regulators should work together to create a single website to act as an interface between themselves and parents. This will set out simply and clearly what parents can do if they feel a programme, advertisement, product or service is inappropriate for their children; explain the legislation in simple terms; and provide links to quick and easy complaints forms on regulators' own individual websites. This single website could also provide a way for parents to provide informal feedback and comments, with an option to do so anonymously, which regulators can use as an extra gauge of parental views. Results of regulators' decisions, and their reactions to any informal feedback, should be published regularly on the single site. *ACTION: Regulators*

## What has happened

With the aim of making it easier for parents to make their voices heard, *Letting Children be Children* encouraged regulators to create a single website to help parents navigate the complex regulatory framework.

On 11 October 2011, ParentPort was launched by the Prime Minister following significant work by a group of key regulators; the ASA, the Authority for Television On Demand (ATVOD), the BBC Trust, the BBFC, Ofcom, the Press Complaints Commission, and the VSC. This portal provides guidance for parents on regulations covering the media and advertising, guides them to the relevant regulator if they wish to make a complaint and allows them to leave other forms of feedback.

Since ParentPort was launched, the site has received over 30,000 unique visitors, with around 250 visitors per week on average. Many of these users access the 'Find Out More' section of the website, where each of the regulators set out, in plain English, their rules and how they enforce them. Around 1,800 visitors followed the 'Make a Complaint' route to individual regulators' websites, although not all of these people actually submitted a complaint.

Regulators have worked to raise parents' awareness of ParentPort, for example through the inclusion of weblinks from other relevant websites, and major broadcasters gifted online advertising space to promote the website. Mumsnet and Netmums both created dedicated discussion boards for parents and carers which included clickable links to ParentPort and some 15,000 promotional leaflets were distributed to Mothers' Union members during December 2012.

In February 2013, a new section was launched on ParentPort offering top tips to parents on a broad range of topics involving children and the media such as online safety, social networking, mobile safety, films, advertising and video games.

## What parents should see

ParentPort provides parents with easy access to all the media regulators, details of the rules they are there to enforce, and their complaints systems. It also provides useful information for parents on a wide range of other media, consumer and technology issues including the appropriate design and retailing of children's clothing, child internet safety, and inappropriate selling via mobile phones. Parents can also use the 'Have Your Say' function of ParentPort to let the media regulators know their views even if they don't want to make a complaint.

## Next steps

We are pleased with the quick progress which the regulators made to develop the ParentPort site, and with their further work to develop its content and to raise parental

awareness of its existence. We expect the regulators to continue to develop ParentPort and to find appropriate ways of measuring success.

## **Recommendation 13 - Making it easier for parents to express their views to businesses about goods and services**

All businesses that market goods or services to children should have a one-click link to their complaints service from their home page, clearly labelled 'complaints'. Information provided as part of the complaints and feedback process should state explicitly that the business welcomes comments and complaints from parents about issues affecting children. Businesses should also provide timely feedback to customers in reaction to customer comment. For retail businesses this should form part of their code of good practice (see Recommendation 6), and should also cover how to make it easier and more parent-friendly for complaints to be made in store. *ACTION: Businesses, supported by trade associations*

### **What has happened**

While Recommendation 12 sought to simplify parents' access to the various media regulators, Reg Bailey also sought to address the negative experience of a significant minority of parents who felt it was difficult to complain about matters of taste and decency. This might be especially the case in shops, where the complaint would usually have to be made in person to a member of staff.

Measuring progress on this recommendation is, by its nature, difficult. Individuals' assessment of what warrants a complaint is often personal and subjective, and if a complaint is made, in some matters, for example children's clothing, there is no objective set of criteria against which it can be judged.

The BRC has pointed out that retailers already offer a comprehensive range of options for customers to share their views about the products and services they offer. This can be done both online and offline. Perhaps, as more shopping is done online, parents are finding it easier to register their feedback, not just through complaint and feedback pages on company websites, but also through customer reviews and social networking.

The TNS omnibus survey for this progress report found some difference between the views of parents in 2012 to those in 2011. Parents were asked if they had ever complained about things (e.g. products and adverts) whether in public places, on TV, on the internet, in a newspaper or magazine that they felt were inappropriate for children because of sexual content, and, if they had complained, who they had complained to. While the percentage of parents who had made a complaint was about the same (eight per cent in 2011, seven per cent in 2012), the percentage who had complained directly to the shop or business concerned had risen, from 27 per cent in 2011 to 52 per cent in 2012. While the small number of respondents to this question means that we must treat

this result with some caution, this result is encouraging because it looks as though more people may be choosing to complain more directly to the companies concerned.

## **What parents should see**

Following the recommendations set out in *Letting Children be Children* and the changes that businesses have made in response, parents should feel that they are able to complain and make their views known without feeling they will be seen as prudes or that they are out of step with social norms.

New technology should make it easier for parents to express their views directly to businesses and to encourage companies to respond to those concerns.

## **Next steps**

We want parents to feel empowered as consumers and, if they are not happy with the way they are treated, to feel that they can bring about change. The recommendation made by Reg Bailey in 2011 is as valid today as it was then. Parents ought to feel that their concerns will get a fair hearing, and businesses should benefit from having parents' feedback.

We would like to see all businesses which provide goods and services aimed at parents and children encourage the family-friendly environment in which parents feel comfortable in giving their views.

# CHANGES IN PARENTS' AND CHILDREN'S VIEWS SINCE LETTING CHILDREN BE CHILDREN

Reg Bailey's analysis in *Letting Children be Children* led him to call for an approach that would put the brakes on an unthinking drift towards ever greater commercialisation and sexualisation, while also helping children understand and resist the potential harms they face. Although he made recommendations for some specific actions, it was also clear that there needed to be a broader cultural change in order to slow that drift.

It has been 18 months since *Letting Children be Children* was published, and this is a short time in which to expect broader cultural change to occur. There has been little quantitative research of the issues in this time, and the TNS Omnibus survey of views of parents and children for this stocktake shows similarity on many points between 2011 and 2012. However, the 2012 omnibus survey did reveal noticeable changes in opinion among parents or children on some specific issues.

## Parents

We are encouraged by the findings of the TNS Omnibus Survey that:

- Parents in 2012 are less likely to agree that, 'children are under pressure to grow up too quickly': 83 per cent in 2012 compared to 88 per cent in 2011.
- The percentage of parents who say they have not recently seen a television programme or advertisement before the 9.00pm watershed they, 'felt was unsuitable or inappropriate for children to see because of sexual content' has gone up from 58 per cent in 2011 to 63 per cent in 2012.
- Although the proportion of parents who had ever complained about products and advertisements that they felt were inappropriate for children because of sexual content stayed static at around 8 per cent, among those parents who had complained, the proportion who had complained to the company or shop involved rose from 27 per cent to 52 per cent, and the proportion who had complained to their local council rose from 4 per cent to 16 per cent. (As the actual numbers of parents who answered these questions were small, these results need to be interpreted with some caution.)

However, in some respects there are higher levels of parental concern than before:

- Parents are more likely in 2012 than they were in 2011 to say that the following advertising techniques should not be used to promote products to children:
  - peer-to-peer marketing: up from 27 per cent to 33 per cent
  - internet advertising: up from 27 per cent to 31 per cent
  - advergames: up from 17 per cent to 24 per cent
  - branded goods and commercial sponsorship in schools, including voucher schemes for equipment: up from 13 per cent to 16 per cent
  - shop window displays: up from 11 per cent to 14 per cent

- advertising in the street or on public transport: up from 10 per cent to 15 per cent
- Parents in 2012 are more likely to say that ‘music shows, videos and DVDs encourage children to act older than they are’ than in 2011: up from 46 per cent to 53 per cent.

## Children and young people

The omnibus results show that some views of children and young people appear to have changed too between 2011 and 2012. In some respects it appears that the commercial and sexual pressures on children may have eased a little:

- The proportion of children who strongly agreed that ‘to be cool you have to act and dress to look older than you are’ dropped from 10 per cent to six per cent.
- It may also be getting easier for children and their parents to find clothes they both like: the proportion agreeing that ‘it’s difficult to find clothes in the shops that I like and that my parents would allow me to wear’ dropped from 48 per cent to 40 per cent, and the proportion disagreeing rose from 38 per cent to 47 per cent.

However, in some other respects the pressures may have increased:

- When children make a decision about what clothes or other products they would like to have, the strongest influences continue to be the cost and whether their friends like or have the same things. However, the proportion of children saying that the most important influence is whether they like the ‘brand, make or TV show/ characters’ has risen from 18 per cent to 23 per cent.
- The proportion of children who said that they had seen ‘things in public places, such as shop window displays or poster adverts aimed at people your age that you thought were really good’ has risen from 28 per cent to 49 per cent, but the proportion that said they had seen ‘things in public places, such as shop window displays or poster adverts, that you thought were not suitable because they were too grown up for young people of your age to see’ also rose, from 15 per cent to 24 per cent.

## FURTHER ACTION

It is clear that good progress has been made against the majority of Reg Bailey's recommendations, although there is more to do to in some areas to implement the changes Reg wanted to see. Government expects to see those responsible acting quickly to make progress in these areas.

Some may believe that, once all the recommendations from *Letting Children be Children* have been achieved, that will be the end of the story. However, we do not see this stocktake as the end of the story, rather the beginning. We want Reg's practical suggestions to signal a cultural change in how businesses, and the regulatory bodies responsible for ensuring compliance with the codes of practice, put the protection of children at the heart of what they do.

We expect to see regulators and businesses to build on the good progress they have made so far. We want them to continue to listen closely to the views of parents and young people, using their opinions to inform decision-making so it aligns with public attitudes. We want to see more done to raise parental awareness of the rules that exist to protect children from commercial pressures or overtly sexualised media, and to develop the tools and resources available to help them navigate the system further. We also want to see voluntary and community sector bodies representing parents and young people working with businesses to co-produce practical and family-friendly solutions to problems. All of this will need to be done in the context of new and emerging technologies and techniques – and we want businesses to ensure that they assess the impact of using these to communicate with children and make sure they equip parents with the information and support they need to deal with them.

We also feel there is more that needs to be done in relation to some specific issues.

On music videos, we want industry to develop solutions no later than the end of the year to ensure online videos - particularly those that are likely to be sought out by children and young people - carry advice about their age-suitability and content. Ministers will make their call to action at a roundtable with key businesses and influencers, including representatives from the music industry and digital service providers, this summer. This will look at the benefits of labels for online content, how they can work together with parental controls to limit children's access to unsuitable content, and also consider any barriers to their use.

We were also interested in the suggestion that there could be more involvement of the community in developing advice about the age suitability of online content that is currently not age rated. The BBFC and the Netherlands Institute for Classification of Audio Visual Media (NICAM) for example have been working together on a simple to use tool – using a free to complete questionnaire - which instantaneously produces age ratings for online user generated content though it could potentially work for other types of online product. The age ratings and content advice that are created by this tool are

able to reflect the standards and societal concerns of the population of the country from which the content is viewed. The tool is being designed to be used by those uploading content or those viewing it. We will be interested to see how it works in practice in giving viewers of the content a voice and if this approach could provide the BBFC with additional intelligence on public opinion.

We want to make it easier for parents to block adult and age-restricted material from the internet. We want ISPs to go beyond their current position and configure their systems to actively encourage parents, whether they are new or existing customers, to switch on parental controls if there are children in the household who are likely to be using the internet. We believe that providers should automatically prompt parents to tailor filters to suit their child's needs. We also expect ISPs to put in place appropriate measures to check that the person setting up the parental controls is over the age of 18. The five main ISPs have made a commitment to provide whole-home filtering solutions to protect all devices in the home and will make setting up internet controls an unavoidable step for parents. If parents choose not to engage with that step (for example, if they just repeatedly click 'yes' to get through set-up quickly) then that would lead to protection being on rather than off. We will call for a progress report to be made to the UKCCIS Executive Board by the end of the year.

We want to see a firmer commitment from WiFi providers and the retail and hospitality sectors to reassure parents that pornography will not be accessible in public places where their children visit. The six main providers (Arqiva, BT, Nomad, Sky, Virgin and O2) and UKCCIS Executive Board members are now considering whether it would be helpful to have a mark of approval or an industry code of practice.

We will continue to take a close interest in how well businesses, trade associations and regulators support parents in allowing their children to be children.

## References

The publications referred to in this report are:

Page 4: Bailey, R.,2011. [Letting Children be Children: report of an Independent Review of the Commercialisation and Sexualisation of Childhood](#). DfE

Page 10 Committee of Advertising Practice, 2012. *Sexual imagery in outdoor advertising: drawing the line*

Page 12: [TNS Omnibus Survey, September 2012, published as an appendix to this progress report](#).

Page 12: Bailey, R.,2011. *Letting Children be Children: report of an Independent Review of the Commercialisation and Sexualisation of Childhood*. DfE. Appendix 2: TNS Omnibus survey of parents of children aged 5-16 in the UK and of children and young people aged 7-16 in GB for the Bailey Review, Spring 2011

Page 13: [Association of Convenience Stores – Lads Mags Guide](#)

Page 15: DfE, 2012. [The Government's Response to the Consultation on Parental Internet Controls](#)

Page 17: *Responsible Retailing: BRC Childrenswear Guidelines*

Page 19: Advertising Standards Authority, 2012. *Public perceptions of harm and offence in UK advertising*

Page 23: DCSF/DCMS, 2009. *The Impact of the Commercial World on Children's Wellbeing: Report of an Independent Assessment for the Department for Children, Schools and Families and the Department for Culture, Media and Sport*. DCSF

Page 25: [Advice on child internet safety 1.0 Universal guidelines for providers](#)

## Abbreviations

AA	Advertising Association
ACS	Association of Convenience Stores
ASA	Advertising Standards Authority
ATVOD	Authority for Television On Demand
BBFC	British Board of Film Classification
BCAP	Broadcast Committee of Advertising Practice
BRC	British Retail Consortium
CAP	Committee of Advertising Practice
FPI	Family and Parenting Institute
ISBA	The Voice of British Advertisers
ISP	Internet Service Provider
OBA	Online Behavioural Advertising
Ofcom	Office of Communications
OMC	Outdoor Media Centre
PPA	Professional Publishers Association
UKCCIS	UK Council for Child Internet Safety
VSC	Video Standards Council



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