

CAP review of the use of children as Brand Ambassadors and in Peer-to-Peer Marketing

Background

The Bailey Review into the commercialisation and sexualisation of childhood recommends that:

The Committee of Advertising Practice 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

CAP takes very seriously the concerns of parents and the need to protect children, which is an enduring principle of the UK Advertising Codes. It has therefore agreed formally to review the issue of employing children as brand ambassadors or in peer-to-peer marketing with a view to considering if a change to the UK Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing (The CAP Code) is necessary. As the Code is binding on all marketers and the sanctions for breaching the Code are material and significant, CAP must ensure that any new rule is a proportionate means of achieving a legitimate aim. This requires a thorough consideration of all the facts relevant to this issue, including an assessment of the impact that a ban or other restriction might have on the marketer, the child and wider society.

If, after reviewing the evidence, CAP concludes a change to the Code is potentially merited, it will carry out a full public consultation. If it concludes otherwise, it will make public its reasoning as to why a change to the Code is not merited.

In support of an Advertising Association initiative, a number of companies have pledged that they will not employ children to market a brand by commercialising the child's friendships ('the Pledge'). The Pledge is also being implemented by various industry bodies, including many that are members of CAP. The Pledge is a significant development and CAP is bound to consider its impact in its formal review. CAP considers it is reasonable to assess the impact of the Pledge after it has been in place for 12 months.

CAP's review will entail:

Understanding brand ambassadors and peer-to-peer marketing

- defining the concepts and documenting the range of these techniques
- case studies

Assessing the impact of the Pledge

- inviting feedback from signatories of the Pledge and their trade bodies on the impact of the Pledge

Assessing the available evidence

- meeting with relevant stakeholders
- inviting stakeholders to submit any research they have conducted, have access to, or are aware of on the potential harmful effects of the above marketing techniques

Outcomes and timings

The review will:

Collate information to allow CAP to make a considered decision after the review period on whether to consult publicly on introducing a ban on the use of children aged under 16 as brand ambassadors or in peer-to-peer marketing.

Be completed and its findings made public in December 2012.