

Bailey Review on the Commercialisation and Sexualisation of Childhood (Industry and Wider Stakeholder Version)

Consultation Response Form

The closing date for this consultation is: 18 March
2011

Your comments must reach us by that date.

THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online response facility available on the Department for Education e-consultation website (<http://www.education.gov.uk/consultations>).

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Please tick if you want us to keep your response confidential.

Reason for confidentiality:

Name	Sarah Burton
Organisation (if applicable)	Children in Scotland
Address:	Princes House 5 Shandwick Place Edinburgh EH2 4RG

If your enquiry is related to the policy content of the call for evidence you can telephone: 0370 000 2288 or e-mail: bailey.review@education.gsi.gov.uk

If you have a query relating to the consultation process you can contact the Consultation Unit by telephone: 0370 000 2288 or e-mail: consultation.unit@education.gsi.gov.uk

Please select ONE box that best describes you as a respondent:

**PLEASE NOTE, IF YOU ARE RESPONDING AS A PARENT, THERE IS A SEPARATE CALL FOR EVIDENCE. YOU CAN ACCESS THIS FROM THE DEPARTMENT'S e-CONSULTATION WEBSITE:
<http://www.education.gov.uk/consultations/>**

<input type="checkbox"/> Manufacturer	<input type="checkbox"/> Retailer	<input type="checkbox"/> Broadcaster
<input type="checkbox"/> Internet/Telecoms Provider	<input type="checkbox"/> Advertising/Marketing Company	<input type="checkbox"/> Industry Regulator/Body
<input type="checkbox"/> Professional/Trade Association	<input type="checkbox"/> Parenting Organisation	<input checked="" type="checkbox"/> Children and Young People's Organisation
<input type="checkbox"/> Education Sector	<input type="checkbox"/> Government Sector	<input type="checkbox"/> Other (please specify)

Please Specify:

Children in Scotland is the national umbrella organisation for the entire children's sector in Scotland. Our 400+ members range from large children's charities and local authorities to community-based groups and individual organisations in the public, private and voluntary sectors.

SECTION 1: FOR INDUSTRY STAKEHOLDERS ONLY

Questions about your business or industry

1 To what extent do you think parents are concerned about how your business, and your industry more widely, impacts on children and young people?

Comments:

2 If you think that parents are concerned, what do you think their key concerns are in respect of your business and industry?

Comments:

3 How does your business and/or industry seek to understand further parents' concerns? Please give specific examples of work you have done, or are doing, in this area.

Comments:

4 Currently, how does your business and/or industry respond to the concerns of parents, children and young people? Please provide specific examples where possible.

Comments:

5 Is there more that either your business or your industry more widely could do to respond to the concerns of parents, children and young people in relation to your industry?

Comments:

6 Is there more that anyone else (Government, other industry groups, regulators, educators, parents etc) could do to respond to parental concerns in relation to your industry?

Comments:

7 Do you have any examples of good practice in terms of how your business and/or industry is responding to the concerns of parents and children? Please give details.

Comments:

SECTION 2: FOR ALL STAKEHOLDERS

General

8 a) The following factors are sometimes said to put pressure on children to grow up too quickly. Which factors do you think have the most influence on children, if any? (tick all that apply)

<input type="checkbox"/> Sexual images (e.g. TV, films and advertising)	<input type="checkbox"/> Advertising and marketing aimed at children	<input type="checkbox"/> Peer pressure
<input type="checkbox"/> Seeing inappropriate things on the internet	<input type="checkbox"/> The things that celebrities like pop stars and actors do	Other (please specify)
<input checked="" type="checkbox"/> None of these and all of these		

Comments:

We need to define, firstly, what is meant by 'growing up'. In many ways British culture works against children taking responsibility for themselves by making it difficult for children to play freely, outdoors, and without overbearing adult oversight at all times. The problem is perhaps that adults frequently do not take sufficient responsibility for their actions.

If the question seeks to establish whether children are taking on aspects of adult culture of which adults themselves disapprove, the question should focus more on our adult culture than the way children are exposed to it.

Even if there were some kind of ban on all advertising aimed at children, children would still view advertising as it is part of our culture. It is better to have children who understand advertising – e.g. are media literate and an informed critical audience -- as this is a skill of lifelong value.

Sexual images, celebrities etc have always been available. The issue is what adults consider acceptable within the public sphere, and what adults choose to prioritise or give value. If adult culture values wealth over wisdom, and if celebrity is the fastest route to wealth, then it will be valued and an aspiration.

Any conclusions from this consultation should be held against UK public policy as a whole, as taking this as an isolated issue is like looking at one symptom of a complex illness. The Scottish Parliament's Equal Opportunities Committee reported on this issue last year. The report underlines the complex interplay of factors involved.

<http://www.scottish.parliament.uk/s3/committees/equal/reports-10/eor10-02.htm>

We should be approaching these issues as responsible adults, considering our own behaviour and purchasing power. Focusing attention on shielding children from adults' poor behaviour is likely to be an inadequate, hypocritical and ineffective 'sticking plaster'.

Gender

8 b) Do you think these pressures...

Affect boys and girls
equally?

Affect girls
more?

Affect boys
more?

None of these

Comments:

There is much discussion about the impact of images of women that distort body shape and emphasise a uniform ideal of beauty. On the surface this might affect girls and women, but it ultimately shapes boys' views of their own gender and how boys and girls, men and women should relate to each other. There is equal impact.

Corporate Social Responsibility

9 In general, do you think that businesses (e.g. retailers, manufacturers, broadcasters, advertisers, internet providers etc.) are responsive to and responsible with regard to the concerns of parents and children? Please give examples.

Yes

No

Not Sure

Comments:

Corporate social responsibility is a voluntary business approach. At best, companies consider their core business, its value and how it contributes to society, and consider the impact of every part of that business. At worst, it is a series of 'box-ticking' philanthropic gestures that mask a deeper lack of responsible behaviour.

If a company's core business is selling children's toys, say dolls, their audience is both gift buying adults and children's demand/pester power. Perhaps parents and children would be content with no advertising, other than discovering what is available in online and real shops. A company is unlikely to be content with this approach, unless all companies faced the same restrictions.

Companies advertising adult products in a public space will do all they can to sell their product, while not annoying their customers significantly. Therefore, a doll production company is likely to consider the impact of its advertising because it doesn't want to offend its customers. Products aimed at adults who are also likely to be parents may take fewer risks in their use of images.

However, business behaviour is not isolated from cultural thinking and cultural behaviour. If we wish business men and women to think differently about how they produce and market products and services, then we need to consider who is in business. If women are largely absent from decision making within business -- and/or the men and women who are there are much removed from family life due to the pressures of work -- then they are unlikely to have a well developed understanding of families and children.

Private and public sector policy, therefore, that encourages different ways of working, flexible working, reduced hours, and parental leave (combined with integrated early childhood education and care) would begin to change adult culture in ways that would be positively reflected in workplaces – and, eventually, in children's lives. This is a UK issue because many of these policy areas are Westminster-determined and may conflict with policies in Scotland. Though there have been some positive changes in leave entitlements and flexibility in work arrangements in recent years, it remains an area of relatively low priority. This affects the status and respect accorded to children and families, resulting in the kinds of concerns this consultation voices.

Screen advertising and film production have very low numbers of women who are mothers working within it. There may be plenty of working fathers, but they work long hours and have limited time with families. The predictable result of this kind of working culture is people alienated from children and family life; their work then reflects a narrow viewpoint. The counter-argument is that the market should compensate by consumers rejecting these products. However, if

attitudes are so culturally engrained and alternatives are not available, second best will be the only choice.

Finally, marketing a brand is a subtle art. Companies will find all kinds of ways to make adult brands known and desirable to children, as future consumers. There are two methods of resistance: a) cultural change in which employees and companies themselves resist what might be considered unethical behaviour and think differently about their product; and, b) helping children and young people understand and make sense of marketing.

Consider this book: *Ripped and Torn: Levi's, Latin America and the Blue Jean Dream* by Amaranta Wright. It raises the issue of how cultural values determine the approach of business and marketing.

Public Space - Physical Environment

10 Thinking about the public space (streets, public transport, shopping and leisure areas), do you think that children are exposed inappropriately to things of a too commercial or sexual nature? If you answered yes, please explain why giving specific examples where possible.

Yes

No

X Not Sure

Comments:

The answer here is the same for the above questions. It is adult culture that needs to be questioned. Why is violence not considered with the same gravity as commercial or sexual imagery? This is far more pervasive and, as with this consultation, culturally unquestioned.

permitted – perhaps these should be reviewed more regularly and opened up for wider debate. Self censorship, in that businesses would be more likely to choose adverts that don't alienate customers, or employees having values that mean they don't suggest particular ways of advertising is preferable. Sharing and airing views, which do not necessarily lead to censorship, but which give voice to passive dislike might help change cultural attitudes.

Public Space - Virtual Environment

11 Thinking about broadcasting and the internet, do you think that current measures to protect children from exposure to inappropriately commercialised or sexualised content and advertising are effective and sufficient? If no, please give specific examples of where you think there are weaknesses.

Yes

No

Not Sure

Comments:

There is not a simple clear way for adults to be sure they can limit what websites can be accessed.

Clothing and Products

12 Thinking about the retail sector, do you think clothing and products for children are sufficiently age-appropriate and gender-appropriate (including non-gendered)? If not, please provide specific examples.

Yes

No

Not Sure

Comments:

There is an excessively strong gender divide. It is difficult for consumers to push for alternatives because sales are obviously good currently. Again, this blue/pink and books for boys/girls divide is a reflection of current cultural values and attitudes. Worryingly, this seems to have become increasingly prevalent in recent years.

Promotion by image of weather-inappropriate clothing, or footwear that can harm growing feet, should also be considered.

Challenging the composition of the workforce and increasing men's involvement in the care and wellbeing of children would go some way to changing the culture to which current commercial trends are responding.

Children as Consumers

13 Parents and children sometimes report that they feel under pressure to buy things they would prefer not to. Who do you think should be responsible for helping parents and children deal with such pressures? (tick as many as apply)

<input type="checkbox"/> Manufacturers	<input type="checkbox"/> Retailers	<input checked="" type="checkbox"/> Government
<input checked="" type="checkbox"/> Regulators	<input type="checkbox"/> Advertisers	<input type="checkbox"/> Marketing Companies
<input checked="" type="checkbox"/> Broadcasters	<input type="checkbox"/> Internet Providers	<input checked="" type="checkbox"/> Educators
<input checked="" type="checkbox"/> Consumer Organisations	<input checked="" type="checkbox"/> Parents	<input type="checkbox"/> Other (please specify)

Comments:

Everyone with influence over parents and children to resist commercial pressure is responsible. However, there are plenty of parents working in business and marketing, so they are responsible, too. Again, this is a shared cultural responsibility.

A useful first step is for adults in child-related professions or consumer organisations to become more vocal about the negative side of these pressures, as well as more active in encouraging children to become savvy about not succumbing to these pressures. Providing attractive, but healthier, alternatives is another obvious step in the right direction.

14 Companies use a range of marketing and advertising techniques when promoting products towards children. Are there any you think are inappropriate for children? If yes, please provide details.

Yes

No

Not Sure

Comments:

Product placement, particularly in entertainment programmes that are watched by families, is a longstanding problem. Product placement is a move towards legitimising more subtle means of advertising, which is more difficult to control. It has been banned from children's programmes, but not from more general programmes that children also view.

There is also an issue of frequency of television advertising. Cable and satellite channels, some of which are aimed specifically at children and young people, have far more frequent advertising breaks during programmes than terrestrial channels. Product promotion is, therefore, reinforced more frequently and regularly.

However, companies will always market their products. Children, young people and adults need increased opportunities to understand how commerce works, how marketing works and when it is – and is not – in their own best interests to take the proffered messages to heart. It is an opportunity for education.

Consumer Voice

15 Do you think that complaints processes for parents to raise concerns about inappropriately commercialised or sexualised products/images/material are sufficiently accessible? If no, please give details of what could be improved and by whom.

Yes

No

Not Sure

Comments:

No, but neither is there clarity about what is done even when complaints are lodged. Even if there were huge numbers of complaints, it might still not be a good idea to censor something. Democracy exists to ensure that it is not just those that shout the loudest who get to decide what should happen. There needs to be greater transparency about who makes decisions, what decisions are made and what people think. We should also be directly and meaningfully asking children to share their views and experiences. And, once shared, their views must be taken shared and treated as influential. If not, then cynicism is the almost inevitable result.

More public debate is needed on this issue and the voices of children and young people themselves must be part of this effort. Children in Scotland has carried several relevant articles in our magazine, and would be interested in

contributing further to discussion of this issue.

General Comments

16 Is there anything else you want to say about the commercialisation and sexualisation of childhood?

Comments:

Entrepreneurship and enthusiasm for business are values that schools endeavour to foster through numerous programmes across the UK. Any business-related activity should be accompanied by serious consideration of social responsibility issues and values. The Apprentice has a potentially huge influence over children and adults understanding of what is deemed important in business. Many within and outwith the business world would dispute the values espoused by those attempting to win the favour of Lord Sugar.

At the end of the day, it is the duty of adults, as parents, consumers and policy-makers, to act in socially responsible ways. Behaving in ways, and promoting values, we would not wish our children to replicate is the issue that needs more fundamental attention.

17 Finally, please let us have your views on responding to this call for evidence (e.g. the number and type of questions, was it easy to find, understand, complete etc.)

Comments:

Easy to follow and questions ok and easy to access, but some kind of more detailed position statement would be useful. Something more concrete to react in favour of, or against, would have been more helpful.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

X Yes

No

All DfE public consultations are required to conform to the following criteria within the Government Code of Practice on Consultation:

Criterion 1: Formal consultation should take place at a stage when there is scope to influence the policy outcome.

Criterion 2: Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.

Criterion 3: Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.

Criterion 4: Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.

Criterion 5: Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.

Criterion 6: Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.

Criterion 7: Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

If you have any comments on how DfE consultations are conducted, please contact Donna Harrison, DfE Consultation Co-ordinator, tel: 01928 738212 / email: donna.harrison@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 18 March 2011

Send by post to: Reg Bailey, Review of Commercialisation and Sexualisation of Childhood, Department for Education, Ground Floor, Sanctuary Buildings, 20 Great Smith Street, London SW1P 3BT

Send by e-mail to: bailey.review@education.gsi.gov.uk