



Best Practice Guide for Communicating with Children

These guidelines cover:

1. Introduction;
2. The age of a child;
3. Communicating with children and the CIPR Code of Conduct;
4. Current legislation;
5. Best practice principles: Food and drink industry, Online communications, In schools communications and Difficult issues;
6. 2011 update - Advertising Association: Best Practice Principle on the use of under 16s in Marketing Activities;
7. Case Studies: NSPCC, Yell, Department of Health, National Schools Partnership;
8. Further information.

1. Introduction

Today's children and young people are growing up in an increasingly commercialised world, and as such exposure to promotional messages is an integral part of their development. However not all promotional messages are commercial; communicating with children on difficult issues now plays a considerable role within the PR industry. It is for this reason the CIPR has put together these best practice guidelines for members and the wider PR community on how communicating with children should be handled.

2. The age of a child

For the purpose of these guidelines a child is anyone under the age of 18 unless otherwise stated. When planning a campaign, practitioners should also take into account the gender, maturity level, ethnic and cultural background of those it is targeting.

3. Communication with children and the CIPR Code of Conduct

These best practice guidelines are designed as a point of reference for practitioners who are undertaking communications in this area not just in the corporate world but in government and the not for profit sector too. Whilst these guidelines do not constitute a legal document, all CIPR members are bound by the Code of Conduct which is based around three principles: Integrity, Competence, and Confidentiality. The Code of Conduct should be adhered to when engaging in any public relations practice and there are elements within the Code's principles which are particularly relevant to any member giving consideration to communicating with children.

Integrity: Integrity is key to the ethical treatment of children, as indeed it is key to all elements of professionalism. It requires that members are honest and truthful when communicating with children.

Members should have regard for the public interest. They should be accurate when disseminating information.

Competence: Members should in this area as in others be aware of the limitations of their professional competence, and should therefore be willing to accept or delegate only that work



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for which they are suitably skilled and experienced. They should ensure that the services they provide are costed and accounted for in a manner that conforms to accepted business practice and ethics.

The drafting of material by public relations professionals for their clients naturally has a role to play in many areas of professional endeavour. But all messages, statistics, and / or claims made in communications should be supported by proof, or a robust and reasonable rationale for the claim.

Confidentiality: Confidential information should not be disclosed unless specific permission has been granted by the parties concerned; or unless it is in the public interest; or unless required to do so by law.

Members should bear in mind that failure to adhere to the CIPR Code of Conduct could lead to disciplinary action, with sanctions up to, and including, expulsion from the CIPR.

The comments above are intended only as an outline of some of the issues raised by the three Code principles; they do not in any way supercede the full text of the Code. This document is intended as a statement of best practice – not as an addition to the Code.

4. Legal requirements

N.B. These guidelines do not constitute legal advice. Action should be taken only after specific legal advice has been sought. The Chartered Institute of Public Relations accepts no liability for any action taken or not taken as a result of this information.

The area of advertising to children is heavily regulated within the UK. It is for this reason that the CIPR has issued this paper for members and the wider PR community in the hope that by establishing best practice guidelines, and ensuring current regulations and laws are adhered to, the PR industry can continue to be self regulated.

Advertising Standards Authority

The Advertising Standards Authority (ASA) regulates commercial communications in the UK through the Broadcast Committee of Advertising Practice (BCAP) and Committee of Advertising Practice (CAP) codes. The ASA does not regulate websites, although online promotional offers are covered.

Non-broadcast media is subject to mandatory industry self-regulation through CAP. This covers a diverse range of media including:

- Advertisements in printed material;
- Posters in public places;
- Electronic media advertisements other than radio and television;
- Sales promotions; and
- Direct marketing activity.

Consumer Protection from Unfair Trading Regulations 2008

The Consumer Protection from Unfair Trading Regulations sets out how commercial practices can be unfair through misleading or aggressive practices and lists 31 specific practices that are

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banned. Under this regulation specific provisions prevent exploitation of vulnerable consumers such as children.

See section 7 for links to further information on this legislation.

5. Principles for communicating with children

Best practice

- When planning campaigns public relations professionals need to take in to account the age, maturity level and gender of the children so the appropriate language and communication tools can be used.
- Effective communication requires engagement with children, parents and carers in the design and delivery of campaigns. Feedback should be listened to and the appropriate changes should be made.
- Consumer campaigns should never aim to encourage children to desire things they cannot afford or would not be able to use.
- All messages should avoid pester power. Children should not be encouraged to pester their parents or carers for goods and services.
- Children should never be shown in unsafe or dangerous situations that could be imitated.
- Campaigns should never show children in a sexual way, nor should they endorse violence or discrimination based on race, gender, sexuality or religion.
- There is a risk that PR can at times lose its key message through editorial. Practitioners should keep this in mind and take steps to clarify any mistakes or inaccurate information that may be misinterpreted by children.
- All messages, statistics, and / or claims made in communications should be supported by proof, or a robust and reasonable rationale for the claim.
- When planning any public relations campaign that is unsuitable for children (as opposed to simply not targeted at them) practitioners should take steps within their power to ensure that this material is not readily accessible to children. If it emerges that children are able to access unsuitable material easily, it may be necessary and appropriate to act to counter this.
- Whether communicating with children as consumers or at difficult times, all practitioners should demonstrate understanding, respect and honesty.

For further information and guidance please see CIPR resources and useful links at the end of the guidelines.

Communicating with children for the food and drink industry

Communicating to children on food and drink products has become highly regulated in the UK and Europe in light of growing concerns about obesity. The CIPR advises members to follow the 2007 CAP rules on non-broadcast media which covers the areas of sales promotions, including on-pack promotions, front page promotions, reader offers, competitions and prize draws, when promoting on these issues.

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In brief, CAP's new rules state:

- ¹Ads must not encourage excessive consumption of food or drink products;
- Ads must not encourage the purchase of food or soft drinks by using licensed characters, celebrities or promotional offers in ads intended for pre-school or primary aged children;
- No ad may promote the pestering of parents or carers;
- Ads must not promote consumption of a food purely to get a promotional offer; and
- Advertisers must not give a misleading impression of the nutritional or health benefits of the product.

CAP rules apply to all food and drink adverts aimed at children, with the exception of fruit and vegetable adverts.

Online communications

With greater access to the internet at home and at school, social media and online PR directed at children is on the rise. When engaging with children using this medium it is advised to use both the above guidelines and to bear in mind the following:

- Under the Consumer Protection from Unfair Trading Regulations it is now illegal to create fake blogs or to falsely represent oneself as a customer (astroturfing). Avoiding false representation with children is particularly important given wider concerns about grooming children online and parents' and carers' concerns about not knowing who is speaking to their children online.
- When engaging with children through the internet, messages should use plain language that can be understood by the age group the campaign is targeting.
- If a website is collecting or storing users' data this should be explained to children in a manner which they can understand. Parents or carers should be made aware where possible if their children's details are being collected.
- Advertising displayed on websites within the EU should be compliant with the Consumer Protection from Unfair Trading Regulations. Website providers should have clear policies on third party advertisements on their pages. Links or pop-ups must be age appropriate.
- At present there is no specific regulation covering broadcasting on the internet. CIPR members must adhere to existing UK legislation and to the Code of Conduct when developing content for online videos.
- By clearly stating policies regarding online promotion in a company's overall online policy, PR practitioners can protect themselves and their clients from any confusion in this area.

For further information and guidance please see CIPR resources and useful links at the end of the guidelines.

In school communications

¹ Department of Health

Changes in food and drink advertising and promotion to children P 9

http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_089129

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The rise of Corporate Social Responsibility policies has led to more organisations working with schools and children's organisations in their communities. The ISBA and the Consumers' Association (CA) have produced best practice principles for commercial activities in schools which are endorsed by the Department for Children, Schools and Families.

The guidelines take into account:

- ²Sponsored resources, such as teaching packs and materials;
- Sponsored activities, such as competitions and projects; and
- Collector schemes, for example: 'wrappers for books' schemes.

A link to this page can be found in the reference section at the end of guidelines.

Practitioners working outside the UK should research local legislation or guidelines and abide by these regulations when promoting in schools overseas.

Communicating with children about difficult issues

Unfortunately we live in a complicated world where many children are exposed to issues that are hard for them to understand and difficult for adults to explain. When engaging with children on sensitive issues such as entering and leaving care, bereavement or abuse we advise members to make use of both the general principles and to take into account the following points.

- The culture, age, background and development of the child.
- When working with vulnerable children, practitioners should make sure there are no barriers to accessing promotional material.
- When designing communications around difficult issues it is more important than ever to listen and respond to feedback from stakeholders, parents, carers and children themselves.
- All types of communications should have continuity in the message.
- Children may be confused and vulnerable, so it is vital that all communication is designed and delivered in an honest, respectful and understanding manner.

6. 2011 update - Advertising Association (AA): Best Practice Principle on the use of Under 16s in Marketing Activities

In October 2011 the Advertising Association introduced a new guidelines to ensure that marketing to children and involving children continues to be conducted responsibly and to address recommendation 8 in the Bailey Report "*Letting Children be Children*" regarding the employment of children for marketing purposes.

The Principle of this pledge is that:

"Young people under the age of 16 should not be employed and directly or indirectly paid or

² Department of Children, Schools and Families and ISBA
Working with Schools – Best Practice Principles
www.isba.org.uk/isba/protecting/current-issues/working-with-schools



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paid-in-kind to actively promote brands, products, goods, services, causes or ideas to their peers, associates or friends.”

Exceptions

CHILD PERFORMERS:

In accordance with EU and UK law, under-16s may be employed to appear in advertisements with local authority permission.

SPONSORSHIP:

Exceptionally talented and high-profile young people in sports and entertainment may be contracted by companies to use the companies' brands, products, goods and services. In those unusual circumstances, direct presentation or promotion to their peers, friends or associates by the young person should not be required or expected.

The principle is not intended to apply to every instance in which a child is involved in promotional or presentational marketing activity. It applies only to marketing activity which commercialises a child's relationships with peers, associates or friends through employment involving payment or payment-in-kind in exchange for active promotion of a brand, product, good, service, cause or idea.

“Payment or payment-in-kind” is any reward with a commercial value, including money, goods or services.

All marketing communications must also comply with the Advertising Codes and with relevant EU and UK law. In any circumstance where a person under 16 is employed to promote a brand, product, good, service, cause or idea, the consent of a responsible adult is required.

As this principle address recommendation 8 in the Bailey Report “*Letting Children be Children*” regarding the employment of children for marketing purposes. **The CIPR endorses this principle and recommends to members that they and their organizations sign the Advertising Association pledge to show their commitment to best practice when communicating with children.**

7. Case Studies

NSPCC - Don't Hide It Campaign

Yell - Yellow Woods Challenge

Department of Health, Immunisation Branch - HPV Vaccination Campaign

National Schools Partnership and LeapFrog Toys

<http://www.cipr.co.uk/content/communicating-children-case-studies>

8. Further information

CIPR resources

[CIPR Code of Conduct](#)

[Social media guidelines](#)

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Useful links

Home Office task force on child protection on the internet

Good practice guidance for the providers of social networking and other user interactive services 2008

<http://police.homeoffice.gov.uk/publications/operational-policing/social-networking-guidance/social-networking-good-practice?view=Binary>

Advertising Standards Authority

www.asa.org.uk/

Bailey Report

Letting Children be Children: Report of an Independent Review of the Commercialisation and Sexualisation of Childhood by Reg Bailey

<http://www.adassoc.org.uk/write/Documents/Letting%20Children%20Be%20Children.pdf>

References

Department of Health

Changes in food and drink advertising and promotion to children

http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_089129

Department of Children, schools and Families and ISBA

Working with Schools – Best Practice Principles

www.isba.org.uk/isba/protecting/current-issues/working-with-schools

Legislation

Consumer Protection from Unfair Trading Regulations 2008

http://www.offt.gov.uk/advice_and_resources/small_businesses/competing/protection