

NIJZ and WHO Capacity building workshop 2017

**DIGITAL MARKETING TO CHILDREN**  
**Methodological challenges for linking public health silos**

Book of Abstracts



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National Institute of Public Health Slovenia  
and WHO Country Office in Slovenia

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Book of Abstracts

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## Review

*Digital marketing is an important challenge for public health. On the one hand, the pressure of the different industries steering and challenging our choices in life is constantly increasing, while on the other hand, public health has a lot to learn in terms of presenting its own agenda, promoting it and disseminating it also through digital marketing strategies and tools. The book of abstracts collecting the contributions from the digital marketing workshop held in Ljubljana, organised by the National Institute of Public Health in collaboration with WHO, brings a range of important contributions. They aim at strengthening the methodologies used by public health in various strategies. The main focus is the impact on developing a healthy lifestyle and preventing NCDs, starting from children. The approach of building capacity and enabling public health professionals of adopting adequate methodologies, which would help them assume a more active role in digital marketing, seems to be an important gain the process. Modernising public health approaches means also developing knowledge, means and methodologies in using IT, social media and other strategies in addressing the challenges posed by the unhealthy lifestyles and the growing problem of NCDs, which is the main global challenge. Workshop in Ljubljana and this volume represent an important contribution to this process and I have no doubt that public health professionals will make good use of the collected materials in this book.*

*Dr. Tit Albreht*

*National Institute of Public Health Slovenia*

*The Book of Abstracts “Digital marketing to children - Methodological challenges for linking public health silos” brings us 7 abstracts and slides on important results, insights and ideas about common methodological grounds in digital marketing, digital “natives”, comparative analyses of digital marketing and public health perspectives. Digital marketing is an increasingly important public health issue and lifestyle determinant. Children across Europe use digital media avidly and increasingly. In 2012, 15-year-olds in the countries of the Organisation for Economic Co-operation and Development (OECD) reported using the Internet for nearly 2 h daily (109 min) on weekdays and an extra half an hour daily at weekends. Although data on this topic is currently limited, some studies by researchers and digital media actors globally confirm that children engage with and enjoy digital marketing. Digital technologies such as the internet, social media and video games use the rapidly evolving practice of marketing and advertising, including personal data collection, high-frequency stimulus, intensive emotional manipulation etc. Children and adolescents are especially vulnerable and unaware of the magnitude of influence of digital marketing and data extraction. Therefore, they should be supported and empowered to safely engage in the digital world to fulfil their rights to information and participation under the United Nations Convention on the Rights of the Child. At the end of the book, there are some further action that could be applied on the EU level, such as clear regulation, the protection of children, raising public awareness, improving digital media literacy etc.*

*Dr. Helena Jeriček Klanšček  
National Institute of Public Health Slovenia*

## 1 Introduction

Digital marketing is one of the important determinants of health and it is linked to all lifestyle areas which, directly or indirectly, public health is dealing with, therefore a multidisciplinary competences and participatory approaches are needed.

National institute of public health of Slovenia (NIJZ) launched a Digital marketing initiative and together with WHO Country Office in Slovenia organized a capacity-building workshop 2017 on Digital marketing to children - Methodological challenges in linking public health siloses.

A capacity building workshop aim was to define how to proceed in the area of digital marketing, by exploring common methodological grounds in digital marketing in different lifestyle areas, to be able to discuss possible common holistic approaches. By going beyond each individual lifestyle area there is an opportunity to increase broad understanding of the problem of virtual reality and link potentials in public health.

The workshop was attended by participants from the National Institute of Public Health (NIJZ), Ministry of Health of the Republic of Slovenia, Agency for Communication Networks and Services of the Republic of Slovenia (AKOS), Ministry of Health of the Slovak Republic, European Commission, WHO Country Office in Slovenia and WHO Regional Office for Europe, Directorate-General for Health and Food Safety (DG Sante), The Open University UK, EuroHealthNet, the Faculty of media in Ljubljana, Faculty of Social Sciences of the University of Ljubljana and Slovenian nongovernmental youth organization No-Excuse.

Lectures on principles of digital marketing, legislative issues, presentation of experiences of the participating countries and possibilities for public health to act were followed by group work and round-table style discussions on recommendations for further steps.

*Dr. Mojca Gabrijelčič Blenkuš*  
*National Institute of Public Health Slovenia*

## 2 Programme

NIJZ and WHO Capacity building workshop 2017 on

### **DIGITAL MARKETING TO CHILDREN**

Methodological challenges for linking public health siloses

#### AGENDA

Ljubljana, 12<sup>th</sup> October 2017

#### **8.30 – 9.00 Registration**

Moderators of the workshop: Dr. Mojca Gabrijelčič, National Institute of Public Health Slovenia and Dr. Darina Sedláková, WHO Country Office for Slovenia

#### **9.00 – 9.30 Welcome words and introduction**

*Dr. Mojca Gabrijelčič, National Institute of Public Health Slovenia*

*Vesna Petrič, Ministry of Health of the Republic of Slovenia*

*Artur Furtado, European Commission - DG Sante*

*Darina Sedláková, WHO Country Office for Slovenia*

9.20 – 9.30 Roundtable introduction of the participants

#### **9.30 – 10.30 Session 1**

9.30 - 10.00 Digital marketing – a new determinant of a healthy lifestyle and NCDs in children – *Jo Jewel, WHO Regional Office for Europe*

10.00 - 10.40 Digital marketing as a lifestyle determinant – technical, ethical and nutritional challenges, *Dr. Mimi Tatlow-Golden, Open University, UK*

#### **10.40– 10.55 Coffee and physical activity break**

#### **10.55 – 12.30 Session 2**

10.55 – 11.15 Digital “natives” – how do they perceive digital marketing? *No Excuse, Slovenia*

11.15 – 11.20 *Short comment from the communication perspective - Dr. Tanja Kamin, Faculty of Social Studies, University of Ljubljana*

11.20 – 11.40 Digital marketing – how it works? *Dr. Andrej Kovačič, Faculty of Media, Slovenia*

11.40 – 11.45 *Short statement on technological options in Slovenia: Petra Zupančič, Agency for communication networks and services of the Republic of Slovenia*

11.45 – 12.05 Comparative analyses of (digital) marketing in different lifestyle areas – *Dr. Mojca Gabrijelčič, National Institute of Public Health Slovenia*

12.05 – 12.10 *Short comment from inequalities perspective: Cristina Chiotan, EuroHealthnet*

12.10 – 12.30 Questions and answers, reflections on the morning sessions

**12.30 – 13.15 Lunch and physical activity break**

**13.15 – 16.45 Session 3**

13.15 – 13.30 Wrap up morning sessions, guidance for the afternoon work – *Dr. Mojca Gabrijelčič, National Institute of Public Health Slovenia*

13.30 – 14.30 World-cafe/roundtable groups discussions on opportunities and challenges in the future, and enablers and inhibitory factors for capacity building (knowledge and human capacities)

14.30 – 15.00 Joint discussion on main outcomes of the group discussions

**15.00 – 15.15 Coffee and physical activity break**

15.15 – 16.00 Opportunities and barriers for policy interventions - *Cristina Chiotan, EuroHealthnet*

15.30 – 16.15 Interactive group discussion on future needs, possible future developments and possible measures

16.15 – 16.45 Discussion on the reporting back from the groups, formulation of the workshop recommendations

**16.45 – 17.15 Recommendations, steps forward and conclusions of the workshop**

### 3 Digital marketing – a new determinant of a healthy lifestyle and NCDs in children

(Jo Jewel, WHO Regional Office for Europe)

#### Abstract

Jo Jewell (WHO Regional Office for Europe) presented on the work of WHO together with Member States in this area – covering work on alcohol, tobacco and food marketing. He started his presentation with a broad definition of marketing, and then focused more closely on marketing promotion (including, but not limited to product advertisement). He underscored the rationale for WHO working in this area, notably that marketing effects preferences, behaviours and consumption of products that cause harm for health. The approach across alcohol, tobacco and food may differ, with sometimes slightly different policy objectives (e.g. restricting food marketing to children and adolescents, rather than adult population). The various WHO policy frameworks were described, notably the European Action Plan for the Prevention and Control of NCDs 2016-2025, which clearly calls for the use fiscal policies and marketing controls to full effect to influence demand, access and affordability for tobacco, alcohol and HFSS foods and drinks. The challenge, as WHO understands, is how to ensure implementations is supported through comprehensive restrictions. This is where digital marketing can present some specific challenges, with academic literature questioning whether existing measures implemented are “fit for purpose” in closing loopholes for digital marketing. Additionally, it was discussed whether countries are addressing issues of digital marketing in silos and not cross-sectorally.

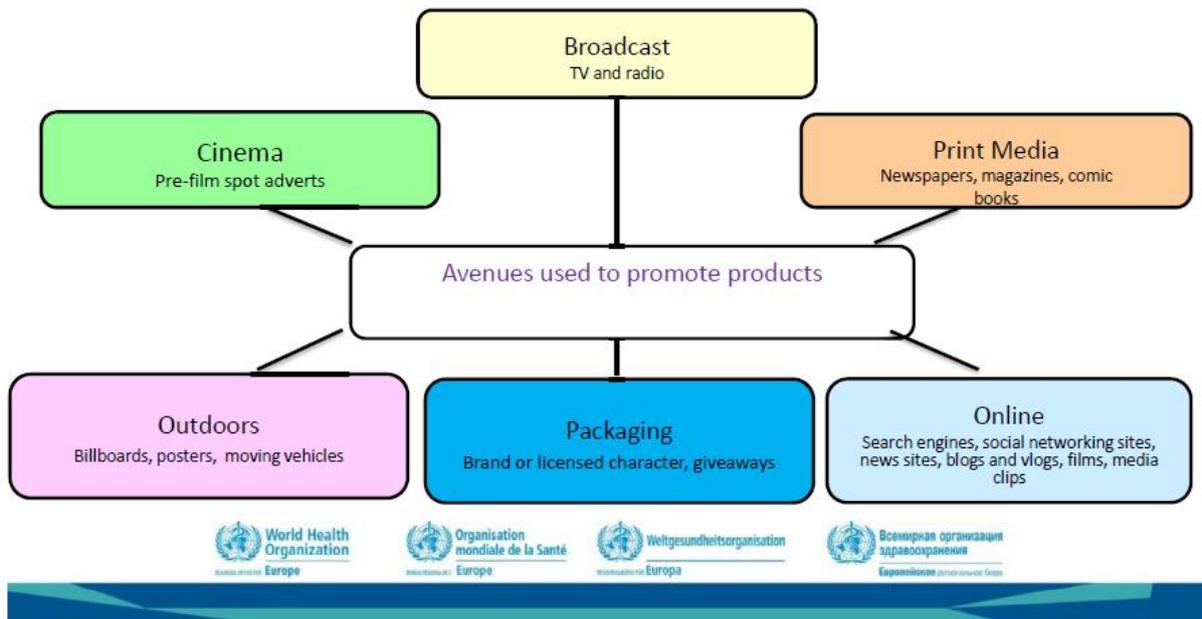
WHO calls for a comprehensive response to the challenge of digital marketing for tobacco, alcohol and HFSS foods. Offline protections should logically be extended online. This will require a clear definition of the types of marketing covered and how this is applied in practice through legislation or other policy means. Additionally, action on internet marketing – by its nature cross-border – lends itself particularly well to EU level action (e.g. EU Directive on tobacco advertising and sponsorship).

#### Key Sources:

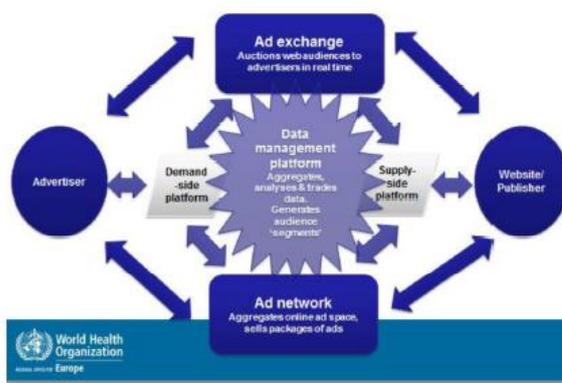
- WHO Regional Office for Europe, 2016. *Tackling food marketing to children in a digital world: trans-disciplinary perspectives. Children’s rights, evidence of impact, ethodological challenges, regulatory options and policy implications for the WHO European Region.* [e-publication]. Copenhagen: WHO Regional Office for Europe. Accessible at: [http://www.euro.who.int/\\_data/assets/pdf\\_file/0017/322226/Tackling-food-marketing-children-digital-world-trans-disciplinary-perspectives-en.pdf](http://www.euro.who.int/_data/assets/pdf_file/0017/322226/Tackling-food-marketing-children-digital-world-trans-disciplinary-perspectives-en.pdf) [1 October 2017].

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- WHO Regional Office for Europe, 2015. *European Food and Nutrition Action Plan 2015–2020*. [e-publication]. Copenhagen: WHO Regional Office for Europe. Accessible at: [http://www.euro.who.int/\\_data/assets/pdf\\_file/0003/294474/European-Food-Nutrition-Action-Plan-20152020-en.pdf?ua=1](http://www.euro.who.int/_data/assets/pdf_file/0003/294474/European-Food-Nutrition-Action-Plan-20152020-en.pdf?ua=1) [1 October 2017].





## What is digital marketing?



Digital marketing is *promotional activity in digital media, maximizing impact with novel creative and/or analytical methods, including:*

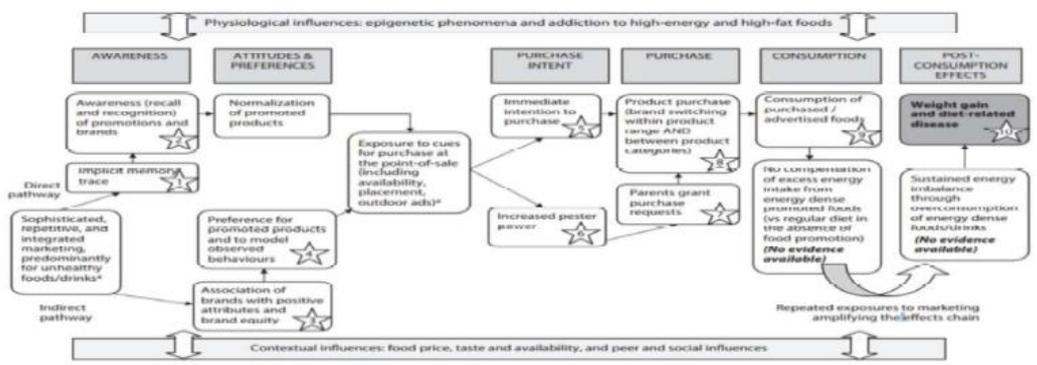
- *creative and social methods to activate implicit emotional persuasion*
- *analytics of online behaviours, emotions, responses, preferences, behaviour and locations*

Source: Tackling food marketing to children in a digital world: trans-disciplinary perspectives (WHO Europe, 2016)

# Particular challenge of “user generated” content



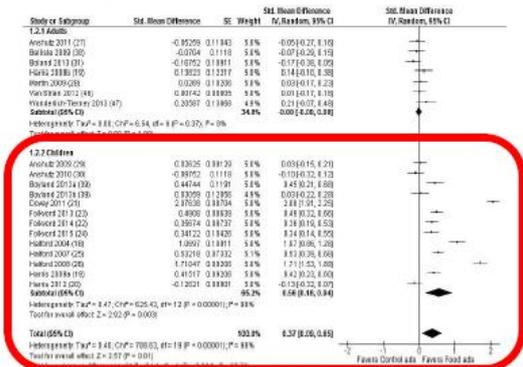
# Why act? Effects of promotions...



Note. Stars indicate that studies are available to assess response indicators (see Table 1).  
 \*Assessed in studies measuring extent and nature of exposure to marketing.



# Why act?



Evidence indicates that the effectiveness of marketing communications depends on the reach, frequency and impact of the message (thus influencing *exposure*) and the content, design and execution of the marketing message (which influences the *power* of the communication).

## Impact of advertising on consumption



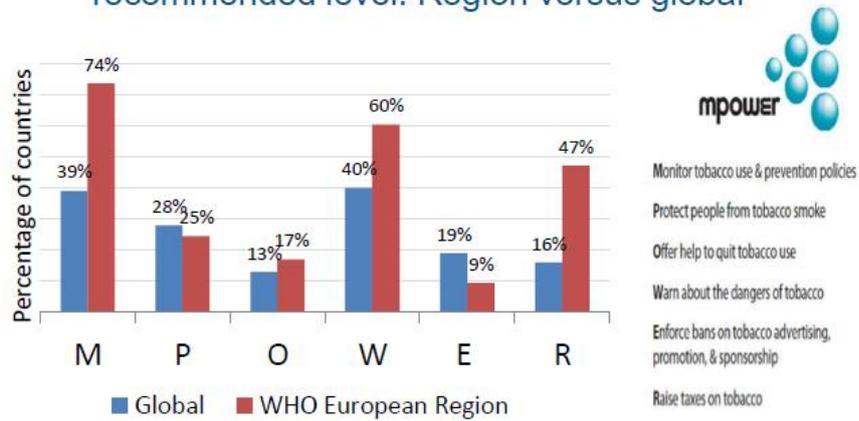
# Vision: what do we want to see in terms of changes to the way products are marketed?



- use fiscal policies and marketing controls to full effect to influence demand, access and affordability for tobacco, alcohol and HFSS foods and drinks
- undertake a comprehensive ban on all tobacco advertising, promotion and sponsorship
- prevent inappropriate and irresponsible advertising and marketing for alcohol that targets children and young people
- adopt strong measures that reduce the overall impact on children and adults of all forms of marketing (including online) of HFSS foods and drinks



## Countries implementing MPOWER at the recommended level: Region versus global



Source: Taking Stock: Tobacco control in the WHO European Region in 2017



## Enforcement of bans on tobacco advertising, promotion and sponsorship



### Strengths

- Only 6 do not enforce some ban on national mass media



### Weaknesses

- Less than 1 in 10 countries enforce comprehensive bans as recommended



the WHO European Region in 2017

# “Best buys” for alcohol control



Regulations over commercial and public availability of alcohol



Comprehensive restrictions or bans on alcohol advertising and promotions



Pricing policies such as excise tax increases on alcoholic beverages



World Health Organization  
Regional Office for Europe



Organisation mondiale de la Santé  
Région de l'Europe

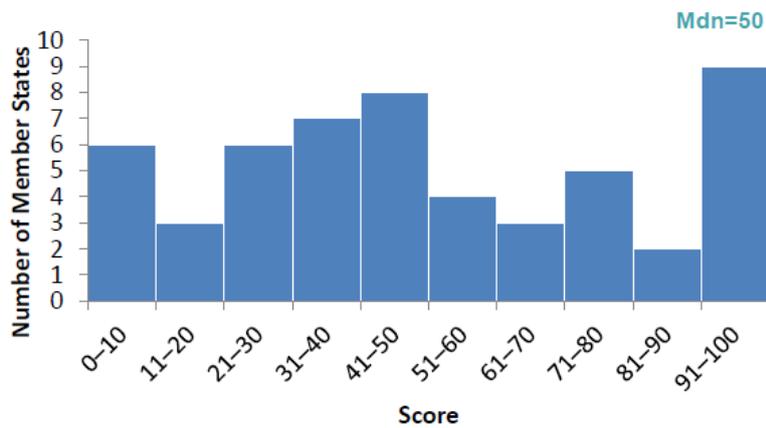


Weltgesundheitsorganisation  
Regionalbüro für Europa



Всемирная организация здравоохранения  
Европейское региональное бюро

## Marketing of alcoholic beverages



World Health Organization  
Regional Office for Europe



Organisation mondiale de la Santé  
Région de l'Europe



Weltgesundheitsorganisation  
Regionalbüro für Europa



Всемирная организация здравоохранения  
Европейское региональное бюро

# Promoting healthy food environments

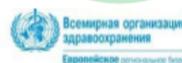
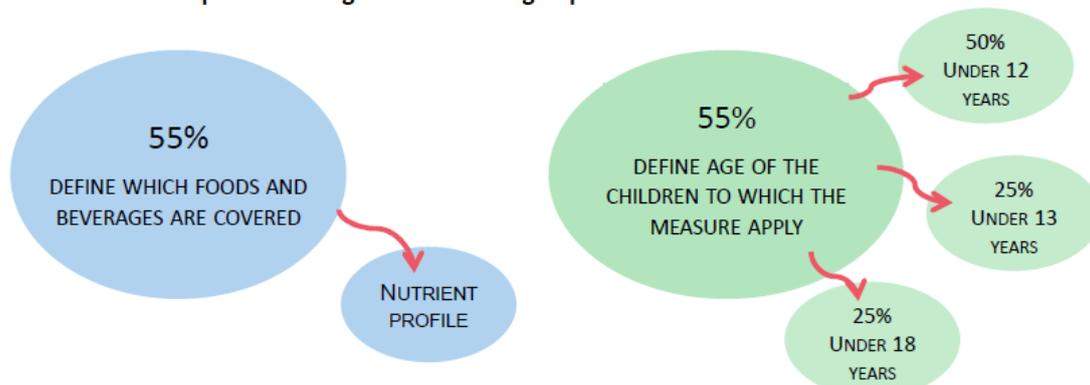


Priority policy options	Objective
Strong controls on marketing, incl. but not limited to TV advertising	Reduce exposure of children to marketing of HFSS foods
Fiscal measures and price policies	Explore policies that affect the price of foods for consumers at point of purchase & create incentives to improve nutritional quality of food supply
Consumer-friendly front of pack labelling	Identify foods for which consumption should be limited or promoted through interpretative labelling; encourage product reformulation
Reformulation, calorie reduction, smaller portions	Stimulate reformulation of food products to improve nutritional composition; regulate the use of specific harmful ingredients (e.g. ITFAs); incentivize smaller portion sizes to prevent over-consumption
Healthier food retail environment, incl. in schools	Improve availability & affordability of healthier food products, through strategic purchasing/procurement, in-store product location and promotion. Introduce school food policies, including food-based standards & restrictions on vending machines.



## National policies on marketing of food and non-alcoholic beverages to children

- 24 countries reported having measures being implemented





# Evidence is building that something needs to be done

"Taken together, the creative tactics and analytics equate to a brand appointing a personal marketer to each child... encouraging them to send marketing messages to their friends, and following them throughout the day... delivering advertising with the maximum impact"

- Users are routinely tracked online using behavioural analysis techniques
- This data collected is highly valuable and sold by social platforms to advertisers
- Helping them to deliver marketing with maximum impact



## Should we be doing something about it?

**YES!**

- WHO recommendations call for a *comprehensive* policy approach;
- Offline protections (e.g. TV restrictions) should logically be extended to online areas;
- The age range to which protection applies should be defined by governments, not commercial entities;
- Clear definition of the types of marketing covered and how this is applied in practice;
- Compel private Internet platforms to remove marketing;
- Action on internet marketing – by its nature cross-border – lends itself particularly well to EU level action (e.g. EU Directive on tobacco advertising and sponsorship).



# What it will take to achieve change

1. Address the ethics and legality of conducting digital research using social media (esp. with children)
2. Research fully characterising the marketing people are exposed to
3. Require companies to disclose marketing spending, activities and reach and engagement
4. Collaborate with government sectors outside of health to perform policy diagnostic (e.g. which legal/regulatory entry point to use) and identify solutions



## Thank you

Acknowledgement to Dr Mimi Tatlow-Golden and Dr Emma Boyland for some slides and intellectual input



#### 4 Digital marketing as a lifestyle determinant – technical, ethical and nutritional challenges

(Dr. Mimi Tatlow-Golden, Open University, UK )

##### Abstract

Dr Tatlow-Golden presented findings from a study for the Irish Heart Foundation (IHF), Who's Feeding the Kids Online? Digital food marketing and children in Ireland ([https://www.irishheart.ie/wp-content/uploads/2016/12/web\\_whos\\_feeding\\_the\\_kids\\_online\\_report\\_2016.compressed.pdf](https://www.irishheart.ie/wp-content/uploads/2016/12/web_whos_feeding_the_kids_online_report_2016.compressed.pdf)) and the WHO study of which she was one of the lead authors, **Tackling food marketing to children in a digital world: trans-disciplinary perspectives** ([http://www.euro.who.int/\\_data/assets/pdf\\_file/0017/322226/Tackling-food-marketing-children-digital-world-trans-disciplinary-perspectives-en.pdf](http://www.euro.who.int/_data/assets/pdf_file/0017/322226/Tackling-food-marketing-children-digital-world-trans-disciplinary-perspectives-en.pdf))

Dr Tatlow-Golden first pointed to the children's rights context in which the IHF and WHO reports were situated and articulated the gaps in current regulation identified by the WHO report.

She pointed to the nature of the design of digital and particularly social media and the ways in which this presents challenges both to children and young people to resist negative effects as well as to regulators to address these. These media are currently designed to be (a) addictive, (b), to extract data (c) for these data to be used to target advertising to the more vulnerable. The new advertising ecosystem is a vast and complex network in which data from all internet users (including children) is taken to personalise advertising. This is increasing the reach of unhealthy advertising and helping advertisers to target those who are most vulnerable to their messages. In particular adolescents are not protected by most regulation and they are treated as adults online. However, they consume a large amount of digital media and are developmentally not well suited to resisting advertising, for biological, social and identity-related reasons.

The Facebook “reach” of the 113 food brands most popular in retail sales and on Facebook among users aged 13 or 14 years in Ireland was identified in the IHF study (Facebook was chosen as it was the most viewed digital platform among teens in Ireland at the time, although indications now are that Instagram and Snapchat predominate). All 18 brands that Facebook estimated had the greatest “reach” in this age group featured sugar-sweetened carbonated drinks, fast foods, savoury snacks, sweets, chocolate and ice-cream. Content analyses found they used tactics of *engagement, emotion and entertainment*. Most frequent – more so than displaying the logo, packaging or advertised items– were prompts to interact

with ads: hashtags and invitations to like, comment and share, indicating brands' desire that adolescents would spread marketing through their networks.

The IHF study also examined the awareness of parents in Ireland to digital food advertising. As in other countries, parents had very low awareness of this form of advertising and their ideas about it were out of date ('pop-up ads', etc). At the end of the study three—quarters of parents favoured regulation of these forms of advertising, demonstrating the importance of building public awareness regarding advertising in digital media.

Dr Tatlow-Golden considered whether the 'conversation' about regulating digital media may be changing in a context where politicians in the US and Europe are increasingly aware of the impact social media has (and external actors may have) on voting patterns. Finally she asked 3 questions:

- **Privacy and targeting:** Why is extraction, storage, sale of personal data and targeted advertising legally permitted for under-18s?
- **Children/youth are frequently positioned as 'knowing subjects'** when consuming food, data and digital privacy information. Where is the evidence that this is the case?
- **Differential susceptibility** is critical. Vulnerability is washed out in studies reporting whole-group effects of food marketing.

#### Key Sources:

- WHO Regional Office for Europe, 2016. *Tackling food marketing to children in a digital world: trans-disciplinary perspectives. Children's rights, evidence of impact, ethodological challenges, regulatory options and policy implications for the WHO European Region*. [e-publication]. Copenhagen: WHO Regional Office for Europe. Accessible at: [http://www.euro.who.int/\\_data/assets/pdf\\_file/0017/322226/Tackling-food-marketing-children-digital-world-trans-disciplinary-perspectives-en.pdf](http://www.euro.who.int/_data/assets/pdf_file/0017/322226/Tackling-food-marketing-children-digital-world-trans-disciplinary-perspectives-en.pdf) [1 October 2017].
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- Tatlow-Golden, M., Verdoodt, V., Oates, J., Jewell, J., Breda, J. and Boyland, E., “in print”. A safe glimpse within the “black box”? Ethical and legal principles when assessing digital marketing of food and drink to children. *Public Health Panorama: journal of the WHO Regional Office for Europe*, [e-publication] 4 (3).

- Presentation



The Open University

# Food marketing to children in a digital world

Methods, ethics, challenges

## Dr. Mimi Tatlow-Golden

Lecturer in Developmental Psychology and Childhood  
The Open University (UK)



The Open University



World Health Organization



The Open University



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World Health Organization  
European Region

Tackling food marketing to children in a digital world: trans-disciplinary perspectives

Children's rights, evidence of impact, methodological challenges, regulatory options and policy implications for the WHO European Region



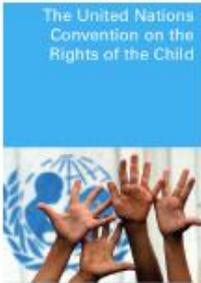


The Open University

## The Rights framework

### UNCRC, 1989

- Children have rights...
  - to *protection* of health, of privacy, and against economic exploitation
  - to *participation* (including in digital media)
- Parents should facilitate these rights
- States should support parents in this



The United Nations  
Convention on the  
Rights of the Child

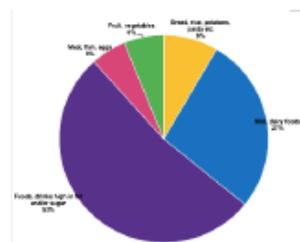
- UNCRC, Arts. 3,4,5,12, 13,14, 16, 17, 18, 24, 32
- International Covenant on Economic, Social and Cultural Rights
- UN 'Ruggie' Guiding principles on business and human rights

## Gaps in current regulation

- Addresses “child-directed”/ “children’s” media, *not children’s greatest media use*
- Applies to marketing *targeted at* children, not marketing *to which they are exposed*
- Nutrient Profiling methods: weak or absent
- Adolescents rarely protected
  - NB: In social media, everyone’s an adult
- Digital media rarely addressed

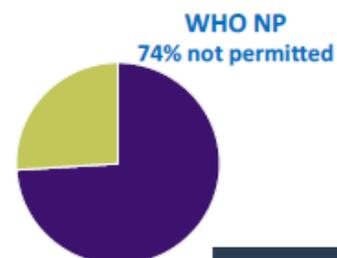
## ‘Advertised diet’ on regulation-compliant children’s TV Island of Ireland

Viewing patterns: 4-6 years (NI/Rol)



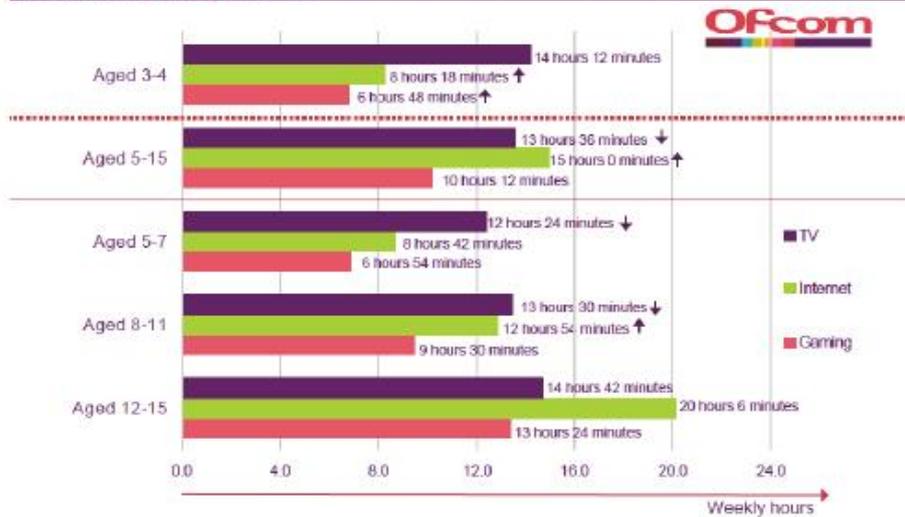
### UK Nutrient Profiling (NP) 53% not permitted

Tatlow-Golden, Murrin, Bergin, O’Brien, Kerr & Livingstone (2016) *Irish Journal of Psychology*



■ Not permitted to be marketed...  
■ Permitted

Figure 14: Estimated weekly hours of media consumption at home or elsewhere among users, by age: 2016



IP13A-B/ QP25A-B/ QP6A-B How many hours would you say he/she spends (USING MEDIUM) on a typical school day/ on a weekend day? Responses are taken from the child aged 9-11 or 12-15 rather than the parent. Base: Parents of children aged 3-7 and children aged 8-15 who use each medium (VARIABLE BASE) - Significance testing shows any change between 2015 and 2016

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18



Since the **EU Kids Online 2010 survey of 25 countries**, our sister project **Net Children Go Mobile** updated the survey in seven countries in 2014.\*

Data from 11- to 16-year olds in 2010 and 2014 (for Belgium, Denmark, Italy, Ireland, Portugal, Romania and the UK) show what they do online on a daily basis.

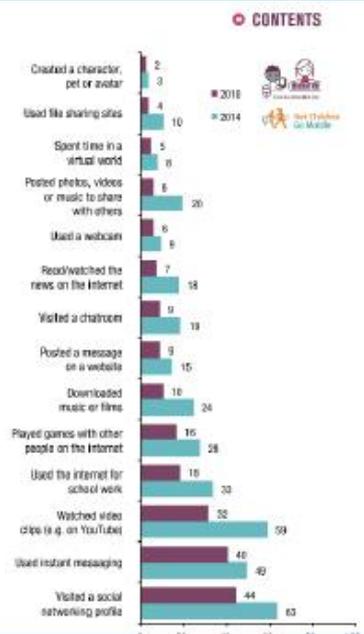
While they are indeed doing more than before, the ladder of opportunities is as steep as ever.

Children are most likely to engage with social network sites, instant messaging, YouTube and gaming.

They are much less likely to create or upload content, read the news online or participate in virtual worlds.

\*Net Children Go Mobile surveyed 9- to 16-year olds in Belgium, Denmark, Italy, Ireland, Portugal, Romania, UK.

11

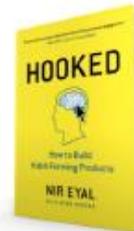


# Designed to be addictive

*"A must read for everyone who cares about driving customer engagement."*

—Eric Ries, author of *The Lean Startup*

Get your autographed copy



<https://www.ted.com/watch/ted-institute/ted-ibm/nir-eyal-what-makes-some-technology-so-habit-forming>

TED Ideas worth spreading



**Details** Transcript Reading List Footnotes Comments  
About the talk 5 languages Further reading Notes + references Join the conversation

A handful of people working at a handful of tech companies steer the thoughts of billions of people every day, says design thinker Tristan Harris. From Facebook notifications to Snapchat streaks to YouTube autoplays, they're all competing for one thing: your attention. Harris shares how these companies prey on our psychology for their own profit and calls for a design renaissance in which our tech instead encourages us to live out the timeline we want.

This talk was presented at an official TED conference, and was featured by our editors on the home page.

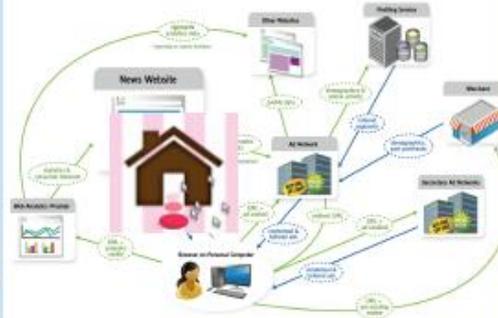
1,420,408 views

Filed  
April 2017 at TED2017

- [https://www.ted.com/talks/tristan\\_harris\\_the\\_manipulative\\_tricks\\_tech\\_companies\\_use\\_to\\_capture\\_your\\_attention](https://www.ted.com/talks/tristan_harris_the_manipulative_tricks_tech_companies_use_to_capture_your_attention)



## Designed to extract data Targeted advertising is the business model



Browser sniffing, Browser fingerprinting  
'Flash', 'Zombie' cookies  
Geo-location  
Device fingerprinting, Device graphs  
Social graphs ... & more



### The Internet

## 98 personal data points that Facebook uses to target ads to you

By Caitlin Dwyer August 14, 2015



Proceedings of the National Academy of Sciences of the United States of America

CrossMark CrossMarked

### Private traits and attributes are predictable from digital records of human behavior

Michael Kosinski<sup>1,2</sup>, David Stillwell<sup>1,2</sup>, and Thore Graubel<sup>1,2</sup>

Author Affiliations: <sup>1</sup>Department of Psychology, University of California, Berkeley, CA, and approved February 12, 2013 (received for review October 26, 2012)

Abstract | Full Text | Author's Note | Figures | SI | Metrics | Related Content | PDF | PDF + SI

**Abstract**

We show that easily accessible digital records of behavior, Facebook Likes, can be used to automatically and accurately predict a range of highly sensitive personal attributes including: sexual orientation, ethnicity, religious and political views, personality traits, intelligence, happiness, use of addictive substances, parental experience, age, and gender. The analysis presented is based on a dataset of over 50,000 volunteers who provided their Facebook Likes, related demographic profiles, and the results of several psychometric tests. The proposed model uses dimensionality reduction for preprocessing the Likes data, which are then entered into logistic-linear regression to predict individual psychodemographic profiles from Likes. The model correctly

**THIS ISSUE**

April 9, 2013  
Vol. 110, No. 15  
ISSN: 0973-8159  
Table of Contents

**Don't Miss**

World Bank  
2013 World Bank  
Landslide Disaster  
Landslide Disaster  
Landslide Disaster  
Landslide Disaster

**Navigate This Article**

- Full
- Abstract
- Results

### Marketing in digital media

Promotional activity in digital media, maximizing impact with novel **creative and/or analytical** methods

- **creative and social methods to activate engagement and implicit emotional persuasion** include immersive narratives; entertainment/ humour; augmented reality, online games and virtual environments; social network engagement (e-Word-of-Mouth); and 'influencers' popular with children (e.g., YouTube video bloggers);
- **analytics**
  - **of behaviour:** hone marketing communications and maximize creative impact;
  - **of emotions, responses, preferences, behaviour and locations:** target specific groups, individuals, and moments of vulnerability.

Tatlow-Golden, Verdoodt, Oates, Jewell, Breda & Boyland, WHO Public Health Panorama, forthcoming



INBOUND MARKETING

### Context Marketing is the New Content Marketing: Are You Ready?

By [Karen Taylor](#) Dec 7, 2015

**Buyer 'personas'**  
**Buyer 'journeys'**  
**Contextual data**

<https://www.kunocreative.com/blog/context-marketing-content-marketing>

## Designed to target = greater vulnerability

Article

### Finding Orchids in a Field of Dandelions: Understanding Children's Differential Susceptibility to Media Effects

American Behavioral Scientist  
2015, Vol. 59(14) 1376–1399  
© 2015 SAGE Publications  
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sagepub.com/journalsPermissions.nav  
DOI: 10.1177/0898010115594552  
abs.sagepub.com  
SAGE

Jessica Taylor Piotrowski<sup>1</sup> and Patti M. Valkenburg<sup>1</sup>

#### Abstract

Most youth and media researchers do not believe that media affect all youth in the same manner or to the same degree. While most media effects theories reflect this belief, empirical efforts often do not. Rather than conceptualizing individual differences as noise or nuisance variables, we argue that the future of media effects research lies within understanding these differences. To that end, the aim of this article is to help youth and media researchers identify appropriate moderators for study inclusion. We discuss the concept of differential susceptibility, with a particular focus on the differences between orchid and dandelion children, highlighting theoretical and empirical applications of this susceptibility paradigm to media effects research. We believe that a more integrative approach to youth and media research, built on a differential susceptibility paradigm in which moderators are thoughtfully integrated a priori, can provide us with nuanced answers to the complex questions associated with youth and media effects.



Digital 'natives'? Problematic concept... and doesn't confer protection

## Aren't children protected?





FEDERAL TRADE COMMISSION  
PROTECTING AMERICAN CONSUMERS

ABOUT THE FTC NEWS & EVENTS ENFORCEMENT POLICY TIPS & ADVICE

Children's Online Privacy Protection Rule ("COPPA")

- Under-13s:
- Online Behavioural Advertising not permitted

BUT

- Can collect data with 'verifiable parental permission'



Global Privacy Enforcement Network

GPEN Privacy Sweep 2015 – Final Results

Total Number of Sites and Apps Examined: 1494  
Total Number of DPAs: 25\*

Indicators	Frequency	Percentage
1. Number of websites/apps examined which collect one or more pieces of personal information	999	67%
2. Number of websites/apps for which protective controls effectively limit the collection of personal data	332	22%
3. Number of websites/apps for which there is an accessible means for deletion of account information	354.5	24%
4. Number of websites/apps for which sweepers identified concerns	446	30%

Disclosure	Frequency	Percentage
Number of websites/apps which may disclose personal information	561	38%

Controls	Frequency	Percentage
Number of websites/apps which request some form of parental involvement	365	24%
Number of websites/apps with a parental dashboard	158	11%
Number of websites/apps for which the child could be redirected off the site	963	64%
Number of websites/apps that tailor protective communications to children	230	15%

## Ethical and legal challenges

- Children's data
- Public or private?
- Valid consent?
- Sensitive information
- Security of processing
- Withdrawal of data
- Benefits and harms

Tatlow-Golden, Verdoodt, Oates, Jewell, Breda & Boyland, WHO Public Health Panorama forthcoming

Ireland  
Top 100 retail  
brands: 73 food,  
drink websites

Nearly 1 in 5 have  
teen appeal



Examples of features of websites for food and drink likely to appeal to teens



Entertainment: Co-creating content, downloading clear cut images and using avatars, using city data \*



Entertainment: Highly targeted content, TV content & digital content, marketing research, using avatars and images \*



Sports: Interactive content, in-event or post-event content, interactive content features \*



Sports: Interactive, highly targeted, using avatars and images, interactive content features \*



Entertainment: Real-time health features, using avatars and images \*



# Social media marketing

- Brand Pages – Build a ‘*closer relationship*’ with social media users
- Ask them to be a ‘friend’ / ‘follow’ / ‘like’ / ‘tag’ others...
- Brand posts appear like friends’ news and updates
- **User-generated content**



## Adolescents' presentation of food in social media: An explorative study

Christopher Holmberg <sup>a,\*</sup>, John E. Chaplin <sup>b</sup>, Thomas Hillman <sup>c</sup>, Christina Berg <sup>a</sup>



#14 år (14 years)  
85% shared food images

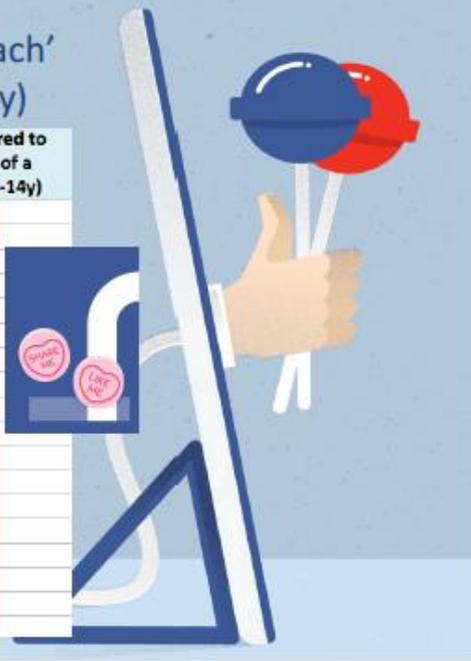
68% energy-dense, nutrient poor  
21% fruit & veg



## Food brands: Facebook 'reach' among young teens (13-14y)

Food/drink *Interest* entered to estimate potential reach of a youth page in Ireland (13-14y)

- Coca-Cola
- McDonald's
- Tayto
- Cadbury Dairy Milk
- Ben & Jerry's
- Domino's Pizza
- Pringles
- Subway (Ireland & UK)
- Lucozade
- Eddie Rockets Ireland
- Supermac's
- Apache Pizza
- 7 Up
- Haribo
- M&Ms
- Nando's
- Abrakebabra
- KitKat








The Open University

**Humour**

**Eddie Rockets Ireland**

1 like BIG BUNS and I cannot let 70¢ go your favourite hamburger for a chance to win a €3000 trip to the USA! To enter just fill in an entry form at your nearest @me!



Message, Engagement potential, At-risk, Competitive, Bold graphics

**Food or drink, packaging, or brand/logo shown or none shown**

**Ben & Jerry's**

Remote control, check. Spoon, check. Chocolate Fudge Brownie, check. And relaxaaaaad



Food shown, Packaging shown

**KitKat**

Ratio or real fills, beat your high score gaming break with KitKat.



No food, brand/logo or packaging shown in the post: fun

**Subway UK & Ireland**

Subscribing you know what he del Chicken Fizzolis vs Big Beef & Cheddar Melt you decide!



**Cadbury Dairy Milk**

Looks delicious right? All you have to do is spread a pic of your favourite #Fudde (Fudge Doodle) more and we'll send you one!



**Lucozade Energy Ireland**

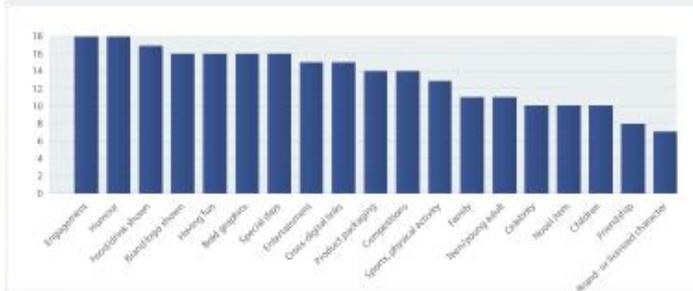
Get yourself over the midweek hump with a Grabetti!



Engagement  
Emotion  
Entertainment



Figure 1: Top techniques used in Facebook food and drink marketing: 18 brand Pages popular with young people in Ireland



## Digital marketing impact: Industry research

### 1. Amplifies TV & other effects

- reach
- recall
- brand likeability (Facebook, 2015)

70% increase of TV effects  
(Microsoft, 2013)

### 2. Greater effects for less spend

x4 direct return, vs TV (Peterson, 2014)

x3 recall compared to control groups  
FB, 14 campaigns (Gibs & Bruich, 2010)



## Do teens make informed choices?



### ***Our promise.***

*At Mars we take our responsibility for marketing our brands appropriately very seriously.  
... Marketing Code ... states that we only promote our products to people aged **12 and over** as this is the **age at which we believe that people can make informed choices about sensible snack consumption***

## Are teens interested in digital marketing?

UK 13-17y online (Logicalis, 2016):

- 73% follow brands they like
- 62% click on ads
- 57% make in-app or in-game purchases
- Media-literate but... susceptible to emotional, networked, social effects of advertising



## 'Informed choices'?

'Media literate' = can recognise ads, understand persuasion and yet...

### Adolescent developmental needs

- **Social:** Connect with peers
- **Biological:** More impulsive, more responsive to HFSS ads than adults
- **Identity:** social media, HFSS foods are actively used

Gaarhardt et al., 2014; Harris et al., 2009; Harris et al., 2014; Leiss et al., 2013; McCreanor et al., 2005; Pechmann et al., 2005; Fitzgerald et al., 2010, 2013; Iordanou, 2009; Stead et al., 2011; Trew et al., 2005



Research Article

## Social Influence on Risk Perception During Adolescence

Lisa J. Knoll<sup>1</sup>, Lucia Magis-Weinberg<sup>2</sup>, Maarten Speekenbrink<sup>2</sup>, and Sarah-Jayne Blakemore<sup>1</sup>

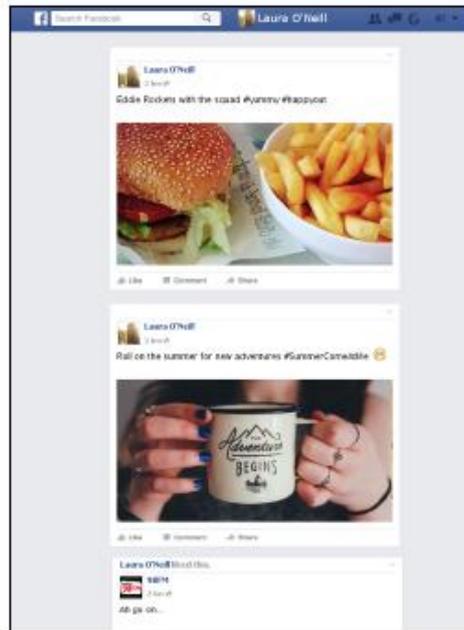
<sup>1</sup>Institute of Cognitive Neuroscience and <sup>2</sup>Department of Experimental Psychology, University College London

aps  
ADVANCED  
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Psychological Science  
1–10  
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DOI: 10.1177/0956797615569578  
ps.sagepub.com  
SAGE



of social influence on risk perception from late childhood through adulthood. Five hundred and sixty-three participants rated the riskiness of everyday situations and were then informed about the ratings of a social-influence group (teenagers or adults) before rating each situation again. All age groups showed a significant social-influence effect, changing their risk ratings in the direction of the provided ratings; this social-influence effect decreased with age. Most age groups adjusted their ratings more to conform to the ratings of the adult social-influence group than to the ratings of the teenager social-influence group. Only young adolescents were more strongly influenced by the teenager social-influence group than they were by the adult social-influence group, which suggests that to early adolescents, the opinions of other teenagers about risk matter more than the opinions of adults.



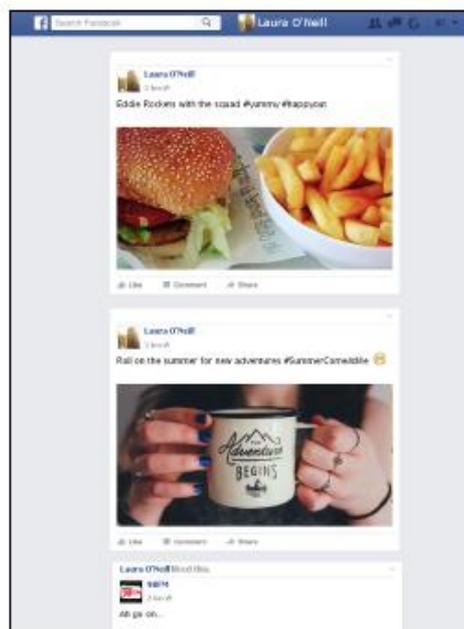
In social media, young adolescents...

recall and recognise unhealthy food brands more than healthy- or non-food brands

Sheppard, Rooney, Murphy, Boyland & Tatlow-Golden (under review)

Awareness:

The first step in the hierarchy of effects (Kelly et al, 2015)



In social media, young adolescents...

... would share content and like profiles more that feature food marketing for unhealthy items

Murphy, Tatlow-Golden, Boyland & Rooney (in preparation)

Unhealthy food items – role in adolescent identity

## Parents' views

The Open University

'Great maturity needed not to fall for it' - 'messages from people they idolise'

'The prizes are things they can identify with and want'

'Dishonest' - 'immoral'

'Sean O'Brien is not going to eat that during training'

'Advertising by stealth'

'They're much more subtle than first thought'

'I asked my children if they see much online advertising and they said yes, they did'

3 in 4 felt regulations 'should apply' online

## Some caveats

The Open University

FINANCIAL TIMES

HOME WORLD US COMPANIES MARKETS OPINION WORK & CAREERS LIFE & ARTS

Advertising + Add to myFT

**Digital advertising: Brands versus bots**

Software fraud claims billions of dollars but the industry finds it difficult to stop

“The Big Read

<https://www.ft.com/content/fb66c818-49a4-11e6-b387-64ab0a67014c>

### Children want...

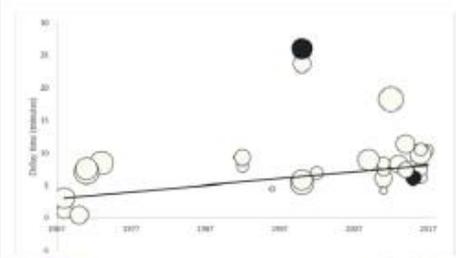
- Fewer ads 71%**
- Less fake news 61%**
- More creative content 55%**
- More privacy 49%**

### Children increasingly disillusioned with social media, survey shows

British students said they want to see fewer advertisements and less fake news

By David Hogg | 4 days ago | 0

<http://www.independent.co.uk/news/education/education-news/facebook-survey-children-disillusioned-social-media-use-less-hmc-study-a7985391.html>



DEVELOPMENTAL | October 26, 2017

**Children of today are better at delaying gratification than previous generations**

By Christine Barrett

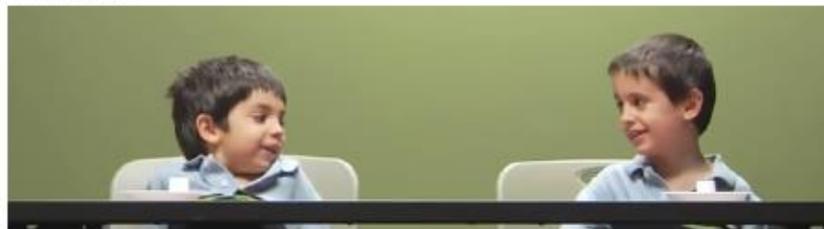
If you believed the copious alarmist commentary in the newspapers, you'd fear for the future of our species. Today's children, we're told, are more hyperactive and technology addicted than ever before. They've lost any ability to sit still, instead craving constant stimulation from digital devices and exhausted parents.

**More self-control?**



- <https://digest.bps.org.uk/2017/09/20/child-ren-of-today-are-better-at-delaying-gratification-than-previous-generations/>

The Marshmallow Test



**CHILD DEVELOPMENT**



Empirical Article

**The Decline in Adult Activities Among U.S. Adolescents, 1976–2016**

Jean M. Twenge<sup>1,\*</sup> and Heejung Park<sup>2</sup>

Version of Record online: 18 SEP 2017

DOI: 10.1111/cdev.12930

© 2017 The Authors. Child Development © 2017 Society for Research in Child Development, Inc.



Child Development  
Early View (Online Version of Record published before inclusion in an issue)

Interaction of all these various changes in children's experience and outcomes has not been explored

**Growing up more slowly? Less...**

- Driving
- Alcohol
- Sexual activity
- Dating
- Working for pay
- Going out without parents
- ... not explained by time on homework, and may not be related to internet use

# Is the conversation changing?



**the guardian**

sport football opinion culture business lifestyle fashion environment tech travel [browse all sections](#)

news letters editorials

## Why Facebook is in a hole over data mining

John Naughton

It's Mark Zuckerberg's business model that allows Facebook to be manipulated by political activists - no wonder he's in denial about it

---

subscribe search

football opinion culture business lifestyle fashion environment tech travel

news letters editorials

## Russian propaganda may have been shared hundreds of millions of times, new research says

By Craig Timberg October 5

Everything we do online leaves a trail. To hold power to account in the digital age, what is required is nothing less than a new civil rights movement.

**the guardian**

jobs dating more [International edition](#)

UK world sport football opinion culture business lifestyle fashion environment tech travel [browse all sections](#)

home > UK > media society law scotland wales northern ireland education

## Ofcom chair raises prospect of regulation for Google and Facebook

Patricia Hodgson says she believes sites could be classified as publishers, as businesses face pressure over fake news

facebook

Graham Ruddick Media editor  
Tuesday 10 October 2017 14:28 BST

If they are 'publishers' they will be subject to regulation

And yet...

POLICY & LAW REPORT US & WORLD

## Cambridge Analytica isn't worried about Facebook ad restrictions

*'Facebook is largely the Wild West in terms of regulations,' targeting firm says*  
 by Russell Brandom | @russellbrandom | Oct 3, 2017, 1:25pm EDT

f SHARE t TWEET in LINKEDIN



“Facebook is largely the Wild West in terms of regulations”

<https://www.theverge.com/2017/10/3/16410950/facebook-cambridge-analytica-russia-ad-targeting-restrictions>

### SUMMARY : The Issues

- Children's 'advertised diet'
  - Even more unhealthy in social media?
  - targeting creates more vulnerability
- Digital marketing: Engagement, emotion, entertainment
  - Ads grab attention, persuade covertly, subvert media literacy
- 'Big data' analytics
  - Amplify power of marketing
  - Target those most vulnerable
- Users' "choice" is distorted
- Parents unaware
- Researchers' access denied
- Children's rights not respected



## THE SEARCH FOR SOLUTIONS

- Research methods, ethics and legality remain to be specified in digital media
- Children and young people – what are their practices?
- BUT ... cognitive awareness, attitudes likely to be independent of emotional, unconscious effects of marketing
- Healthy apps, marketing, targeting, social marketing, media literacy – *caution required*



## THE SEARCH FOR SOLUTIONS 2

- **Privacy and targeting:** Why is extraction, storage, sale of personal data and targeted advertising legally permitted for under-18s?
- **Children/youth as knowing subjects** when consuming food, data and digital privacy information. Are they?
- **Differential susceptibility** is critical. Vulnerability is washed out in studies reporting whole-group effects





Thank you!

[mimi.tatlow-golden@open.ac.uk](mailto:mimi.tatlow-golden@open.ac.uk)

[www.open.ac.uk](http://www.open.ac.uk)

## 5 Digital “natives” – how do they perceive digital marketing?

*(Urška Erklavec, MPharm, Daša Kokole, MPsy, No Excuse Slovenia)*

### **Abstract**

The aim of the research was to preliminary explore young people's experiences with the digital world and their perceptions of the digital marketing. Data was obtained with 5 focus groups in the groups of 15 to 19 year old students.

Participants are mainly using the social networks such as Facebook, Instagram, Snapchat and Youtube. Most of the participants are not aware of the technical background of the digital environment. When asked about separation between online and real world, the participants showed awareness that what one presents online are often only the positive events, which can skew other people's perception of real world. Majority of participants saw online world as a means of communication that enables them to meet and socialize in real life. Participants are aware of the possibility of leaving your digital information for others to see. As negative sides participants mentioned loss of actual privacy, as well as loss of feeling of security and privacy, and use of available information by other parties (e.g. advertisers). Participants generally noticed marketing in the digital environment, most commonly in forms of Instagram ads, Youtube advertisement before a video is shown, pop-up ads. Some find that disturbing and some are also aware that the ads that are being shown to them influence them wanting the product. Often mentioned was also the influence of cookies and how they are influencing (personalizing) the ads that are being shown to them. There was some difference between younger and older participants, with younger participants having an opinion that online marketing should be regulated, whereas the older participants were of an opinion that such regulation would be very hard as the companies will always find another way. Additionally they thought more can be done on individual level, by using services such as Ad blocker and educating yourself about the topic and being aware of when you are a target of advertising. Age restrictions (on Facebook) were not seen as useful, as they (and many other young people) can set their age to anything (so they can use facebook even before they are 13).

In general, participants thought digital marketing is an important topic. On one hand they are aware of potential benefits (e.g. making shopping easy), but on the other hand they also see it as intrusive and having potential negative consequences.

### **Key Source:**

- Preliminary study with focus groups

## Presentation



*Summary of a Preliminary Study*

*Urška Erklavec, MPharm.*

*Daša Kokole, MPsy.*

*No Excuse Slovenia*

*Ljubljana, 12th October 2017*

## Digital natives – how do they perceive digital marketing?

### Digital native



- ▶ a person that grows-up in the digital age, rather than acquiring familiarity with digital systems as an adult, as a **digital immigrant**

- ▶ youth organization in a public interest
  - ▶ strives for positive social change and personal growth of young people
  - ▶ non-formal education, social participation and activation
  - ▶ raising awareness among young people about actual topics and stimulating their critical thinking
  - ▶ sustainable development, healthy lifestyle and active citizenship of young people
- 



### **Aim of the Preliminary Study**

---

to preliminary explore young people's experiences with the digital world and their perceptions of the digital marketing, especially their:

- ▶ experiences with the digital world,
  - ▶ opinions on living in the digital world,
  - ▶ experiences with digital marketing and
  - ▶ opinions about digital marketing.
- 



## Method

- ▶ 5 focus groups were carried out
- ▶ 1 focus group: males
- ▶ 1 focus group: females living in urban area
- ▶ 1 focus group: females living in rural area
- ▶ 1 focus group: younger (15-17)
- ▶ 1 focus group: older (17-19)



## *Experience with the Digital World*

- ▶ participants are mainly using social networks such as Facebook (for news), Instagram (for photos), to lesser extent also Snapchat
- ▶ Youtube is also used fairly often, mostly for educational and entertainment purposes
- ▶ Online gaming (mainly boys)
- ▶ Most participants were not aware of the technical background of the digital environment

## *Separation between Online and Real World*

- ▶ participants were aware that many people only post about positive events and admitted they sometimes do it themselves too – can skew people's perception
- ▶ they see that many people are much more daring online and would say things online they would never say in real life, as it is very easy to publish your opinion



**INTERNET YOU      REAL WORLD YOU**

## *Separation between Online and Real World - cont.*



- ▶ majority of the participants saw online world as means of communication that enables them to socialize in real life
- ▶ one participant mentioned that the border is crossed when you start avoiding/neglecting social life in order to replace it with the online life

## *Leaving your Digital Footprint Online*

---

- ▶ Participants (especially older ones) are aware of the possibility of leaving your digital information for others to see
- ▶ Positive sides of being visible and leaving traces online: the ability to follow what friends are doing, simplifying use of certain services (eg. by being able to connect all your accounts into one), option of identifying people who are bullying online.
- ▶ Negative sides: loss of actual privacy, as well as loss of feeling of security and privacy, and use of available information by other parties (e.g. advertisers).

---

## *Experience with Digital Marketing*

---

- ▶ most commonly noticed: Instagram and Facebook ads, Youtube advertisement before a video is shown, pop-up ads
- ▶ also noticed: influence of cookies and how they effect the ads displayed to them (e.g. based on their conversations, previous search)
- ▶ generally they think it is an important topic



Obiščite nas pod Chupa Chups šotorom v soboto pri HM Mercator Šiška in v nedeljo na Čarobnem dnevu v Volčjem potoku! Se bomo zabavali, sladkali, polepili vas bomo s tatui in še kaj se bo našlo!

Ker dober glas seže v deveto vas, bomo podelili kar 10 nogometnih žog in 10 vrečk z lizikami med tiste, ki boste objavo všečkali, komentirali in delili :) Se vidimo!



**McDonald's**  
Sponsored

[KUPONI ŽE V VAŠIH NABIRALNIKIH]  
Ste že pokukali v nabiralnik? Notri vas čaka kar 36 kuponov, s katerimi McDobrote lahko dobite precej ceneje.  
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**Coca-Cola**  
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Vsi imamo prijatelja, ki ima vedno perfekten "summer look" ☺️ #Potegaj ga oziroma jo ☺️

**Loacker Slovenia**  
2 hrs

Koga bi povabili/a na domač ledeni čaj in hrustljave Loackerjeve napolitanke z okusom limone? Označi ga/jo v komentarju. ☺️

**Coca-Cola with Tajul Islam and Hot Video Everyday.**  
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Do 30. junija se nam lahko pridružiš na BREZPLAČNIH TEKAŠKIH TRENINGIH ☺️ Pridi? Več na [www.pospesiritem.si](http://www.pospesiritem.si)

**Union shared their event**  
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Union to jesen prireja turnirje v malem nogometu po vsej Sloveniji, ki bodo vikende popostrili z druženjem, rekreacijo in seveda – s pivom!

**VINO LJUBLJANA**  
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Si mladi-a od 18 do 30 let? Zagotovi si BREZPLAČNO VSTOPNICO za vinski sejem!  
Preglej seznam in se prijavi na eno izmed poučnih delavnic, ki jih pripravljamo skupaj s SOU. Pohiti! Število mest je omejeno.  
Seznam in prijavnico najdeš na <http://www.vinoljubljana.si/sejem-vino/mladi-vino>

2 hours ago

prodam tobak varginija gold cena za 1kg 30€ +pos cena za 0.5kg 20€+pos in vzorci 100g 10€ postrina gratis možnost osebneg prevzema v Ljubljani ali enkrat tedansko Celje.

**Heineken Mesto Kolesari**  
Sponsored

Živi z mestom in zadeni nagrade #mestokolesari

SEP 24  
Živjo, ne  
Sep 24 9:16  
167 peop

60

Naloži aplikacijo sedaj  
1 friend uses this

Install Now

## *Opinions on Regulation*

---

- ▶ younger participants thought online marketing should be regulated (e.g. alcohol, tobacco),
- ▶ older participants were more of an opinion that such regulation would be futile as the companies will always find another way to promote their products
- ▶ they thought more can be done on individual level, by using services such as Ad blocker and educating yourself about the topic and being aware of when you are a target of advertising.

---

## **Conclusion**

---



- ▶ Mainly through social networks
- ▶ Aware that digital does not reflect real
- ▶ Digital footprint is perceived as helpful and threatening to privacy
- ▶ Most commonly Youtube and Instagram ads
- ▶ More regulation of digital marketing is wanted

---

## Thank you!

Urška Erklavec, No Excuse Slovenia

[urska.erklavec@noexcuse.si](mailto:urska.erklavec@noexcuse.si)

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## 6 Digital marketing – how it works?

(Dr. Andrej Kovačič, Faculty of Media, Slovenia)

### Abstract

With advanced communication techniques described in this presentation, professionals create and anchor pleasant feelings on the brand name they promote. Regardless whether stimulus anchoring comes in a form of sponsorship, direct ads or product placement, children are programmed to spend more time and become more addicted to media trance in order to get more and more commercially oriented hypnotic suggestions. The „battle“ for young consumers intensifies on the internet, where regulation is scarce and with the advances in technology more and more aggressive emotional excitement is aroused in younger and younger children. High frequency stimulus, intensive emotional manipulation and deep trance phenomena are used by professionals on subconscious level to target individuals and their weaknesses. Unfortunately children, parents, communities and regulators are unaware of the magnitude of influence and data extraction (in creating a consumer profile) and (or) feel helpless preventing it.

First, we urgently need official recommendation for (future) parents and teachers regarding the recommended screen exposure - especially for the youngest. We have to provide quality education on the subliminal techniques used in marketing. Finally, we also need to balance commercial (unhealthy) marketing with substantial and professionally created healthy lifestyle advertising.

We have to make ACTION now - before people play virtual reality games on the back seat of a self-driving car unable to communicate to anyone else but a computer. The knowledge of advanced influence techniques has to be used to create a future society where people are not only programmed consumers with complete data profiles that is never deleted but also humans who are able to express their own opinions and emotions and thus live a quality life.

### Key Sources:

- J. Rideout, V., G. Foehr, U. and F. Roberts, D., 2010. *Generation M<sup>2</sup>: Media in the Lives of 8- to 18-Year-Olds*. [e-publication]. Menlo Park: Henry J. Kaiser Family Foundation. Accessible at: <https://kaiserfamilyfoundation.files.wordpress.com/2013/04/8010.pdf> [1 October 2017].
- [www.pismenost.si](http://www.pismenost.si) [1 October 2017].

## Presentation



A presentation slide with a blue and green background. The top half features a collage of images including a laptop, a globe, and various business-related scenes. The bottom half has a black bar with the title "Digital marketing – how it works" and a green bar with the author's name "Andrej Kovačič Ph.D.".

### Digital marketing – how it works

Andrej Kovačič Ph.D.

## Developments in digital society

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Finding emotional excitement in:

- face-to-face communication
- ↓
- computer assisted communication
- ↓
- computer satisfied communication



## How does it work?

### Advertising

- ANCHORING (stimulus - response – Pavlov, 1902) of POSITIVE EMOTIONS on the BRAND NAME (trademark)
- (post) hypnotic SUGGESTIONS for ACTION (PURCHASE)

### All EMOTIONS fall into three categories:

- reptilian (eg. sex-related content – 3 years +)
- pro-social (eg. virtual communities, online games...)
- individualistic (eg. violence, instant rewards, praisings, supreme graphics)

↑ extremes = ↑ arousal = ↑ anchoring

What suggestions do we get in our subconscious mind?

Anaconda (Nicki Minaj – 2014)

One in my purse, **bitch**, I came dressed to **kill**  
Who wanna **go first**? I had them pushing daffodils  
I'm high as hell, I **only took a half a pill**  
I'm on some **dumb shit**, by the way, what he say?  
He **can** tell I ain't **missing no meals**  
Come through and **fuck him** in my automobile

Oh my gosh, look at her **butt**...  
Yeah, he love this **fat ass**, hahaha!  
Yeah! This one is for my **bitches**  
with a fat ass in the **fucking club**  
I said, where my **fat ass big bitches** in the club?  
**Fuck the skinny bitches!**  
Fuck the **skinny bitches** in the club!  
I wanna see all the big **fat ass bitches**  
in the **muthafuckin'** club  
**Fuck you** if you skinny bitches, what?! Kyuh

Dirrty (Cristina Aguilera - 2002)

...I **need** that (uh) to get me off  
Sweating 'til my clothes come off  
Let's **get open**, cause a commotion  
Still going, 8 in the morning  
There's **no stopping**, we keep it popping  
**Hard** rocking, everyone's talking  
Give all you got (**give it to me**), just **hit the spot**  
Gonna get my girls, **get your boys**, gonna make some noise  
Wanna get **dirrty**  
It's about time **that I came** to start the party  
Sweat dripping over my body  
It's about time for my **arrival**...  
**Uh, what**

Dying light (game 2015 - )  
**Fuck Fuck Fuck Fuck. Kill them. ....**

## Deep trance

... is crucial for media to deliver and entertain.

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Somnambulistic states provide:

- time distortion
- no feelings of pain
- pleasant feelings
- increased suggestibility
- no conscious knowledge of ever being influenced  
(this is the most valuable for advertisers)

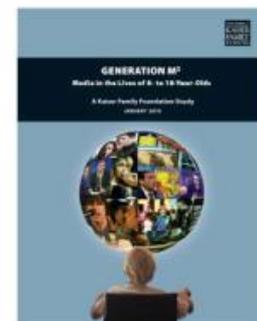
## USA leads the way

### Media Use Over Time

Among all 8- to 18-year-olds, average amount of time spent with each medium in a typical day:

	2009	2004	1999
TV content	4:29 <sup>a</sup>	3:51 <sup>b</sup>	3:47 <sup>b</sup>
Music/audio	2:31 <sup>a</sup>	1:44 <sup>b</sup>	1:48 <sup>b</sup>
Computer	1:29 <sup>a</sup>	1:02 <sup>b</sup>	:27 <sup>c</sup>
Video games	1:13 <sup>a</sup>	:49 <sup>b</sup>	:26 <sup>c</sup>
Print	:38 <sup>a</sup>	:43 <sup>ab</sup>	:43 <sup>b</sup>
Movies	:25 <sup>a</sup>	:25 <sup>ab</sup>	:18 <sup>b</sup>
TOTAL MEDIA EXPOSURE	10:45 <sup>a</sup>	8:33 <sup>b</sup>	7:29 <sup>c</sup>
Multitasking proportion	79% <sup>a</sup>	76% <sup>a</sup>	16% <sup>b</sup>
TOTAL MEDIA USE	7:38 <sup>a</sup>	6:21 <sup>b</sup>	6:19 <sup>b</sup>

Independent  
Research  
Kaiser foundation:



<http://www.kff.org/entmedia/entmedia012010nr.cfm>

83 % percent of parents stated that kids spend too much time using electronic devices

vir:<http://www.rasmussenreports.com>

## Consequences

When you DIE in a computer game you only lose a life.

When you kill someone in a game you get more points.

When you play you get instant pleasure that gets better every time as trance deepens...

The more realistic („virtual“) reality more easily gains control and makes more money and has more power and media and more control and more power... to eliminate all obstacles in de-humanising the human.

With no limits many people will go to extremes of becoming a **plugged-in human hybrid running on oil, flour, milk and sugar.**

## More research

- Media literacy - Slovenia (2016, n= 300)
- Media and pre-school children in Slovenia (2016, n= 1000 parents)
- Media and secondary school Slovenia(2016, n= 800 teenagers)
- Media and elementary school Slovenia (2016, n= 2800 parents)
- Media and the disabled (2017-2018)

## More media consumption with kids of all ages ...

- Lower life satisfaction
- Less real friends
- Less healthy lifestyle
- Lower grades
- More mental health related problems and diagnosed diseases
- More conflicts with others
- More violent behaviour
- 30 % of every lesson is lost due to mobile phones in secondary schools
- ...

## Internet „free“ space and guided tour

no regulation – no control – guided tour

### **We are:**

letting generations of kids (and thus the future society) „wonder in space“, being guided and bombarded with totally unsuitable content, presented in realistic quality with advanced techniques and with high frequency stimulus, with a clear aim to sell more (sheep to wolves).

People will not be able to resist until their life is wasted behind computers – especially computer games (as junkies). Healthy individual programmed to fail (spend money) since childhood?

**If people really knew what is going on...  
would they want to change?**

**If they knew and wanted  
would they be able to change since they had  
been programmed from the childhood on?**

**WHO will help them re-programme  
(100.000+ violent acts they see by the age 18)  
so that when they become adults they are „OK“?**

**and with new technology ...  
are we creating self-driving cars just so that we can  
play a virtual reality game also on the road?**

## **ACTION plan - what could we DO**

**Educate – especially to not addicted and  
younger generations with examples of  
consequences and techniques  
(obligatory education as for drugs)**

**Advertise – with advanced techniques on the  
subconscious level in virtual and realistic  
environments**

**Limits, recommendations, goals – written now!**



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»The [infrastructural] program of Faculty for media – collecting, managing and archiving data on media literacy« Nr. 1000-16-2916.

## **7 Comparative analyses of (digital) marketing in different lifestyle areas**

*(Dr. Mojca Gabrijelčič, National Institute of Public Health Slovenia, with inputs from Austria and Slovakia)*

### **Abstract**

Digital marketing to children is linked to a range of lifestyle factors public health is dealing with. By joining forces in all lifestyle areas, namely tobacco, alcohol, gaming and gambling, physical activity, nutrition and others, including mental health, public health could identify potentials and challenges broadly and define common goals and agendas more efficiently.

Presentation is exploring the situation in Slovenia, Slovakia and Austria with regard to the following questions:

(1) Are there any rules (regulation, coregulation, selfregulation) for reducing marketing pressure of the products to children in different lifestyle areas in the country? (2) If yes, what kind of rules does exist? What channels of marketing they do apply to? Do they apply also for digital marketing? If yes, what kind of digital marketing? (3) How successful are such rules for digital marketing in a specific lifestyle area? What are the main challenges (definition of target group, age limitation, criteria, distribution channels, data privacy, tracking, monitoring, ...) in digital marketing? (4) What are the key obstacles and key facilitators for improvement of the situation (reducing or restricting pressure) in digital marketing in specified lifestyle areas? (5) What are the most promising steps forward in (reducing or restricting) pressure in digital marketing in specified lifestyle areas?

Comparative analysis of marketing approaches in different lifestyle areas in Slovenia, Slovakia and Austria is showing that traditional media are more regulated, selfregulated or coregulated than digital media. It is also observed that digital marketing in more traditional lifestyle factors, such as nutrition, tobacco and alcohol, is more regulated as in the new emerging ones, such as gaming and gambling. It seems that rules in restricting marketing specifically in physical activity lifestyle factor do not exist or are not detected. In general, fewer rules exist in the digital as in the real world.

Distribution channels were detected as more challenging in implementation of rules for reducing or restricting pressure in digital marketing to children as the target group definition.

The most challenging issues in digital marketing in different lifestyle areas to children are: (1) monitoring and evaluation violations of introduced restrictions, (2) online sales and advertising by companies HQ in the other countries, (3) marketing self-regulation is not successful, (4) the need for establishing a system, detecting monitoring and evaluation

marketing communication messages in all the media, including the world wide web and mobile applications, to guarantee a better surveillance.

Multidisciplinary competence and participatory approach are needed. As the key inhibitory factors for reducing the pressure of digital marketing to children in different lifestyle areas were detected (1) non-existing or inappropriate (outdated) national and EU legislation, (2) missing political will or consensus to act, (3) profitability is more important than public health, (4) internet is a non-regulated territory. Key enabling factors to reduce pressure of digital marketing to children could be (1) mobilisation of public opinion pools, (2) bringing forward consumers and citizens rights, (3) raising the awareness of consumers and citizens, (4) informing the general public about the health impacts of digital marketing and their consequences, (5) better intersectoral cooperation, (6) better international cooperation, (7) more comprehensive and effective prevention, field work, advisory services.

#### **Key Sources:**

- Restrictions on the Use of Alcohol Act (Official Gazette of the Republic of Slovenia, number 15/03 and 27/17)
- Act Amending the Health and Hygiene Safety of Foodstuffs and Products and Materials Coming in Contact with Foodstuffs Act (Official Gazette of the Republic of Slovenia, number 42/02)
- Restriction on the Use of Tobacco and Related Products Act (Official Gazette of the Republic of Slovenia, number 9/17 and 29/17)
- School Meals Act (Official Gazette of the Republic of Slovenia, number 3/13)
- Gaming Act (Official Gazette of the Republic of Slovenia, number 14/11, 108/12, 11/14 in 40/14)
- Audiovisual Media Services Act (Official Gazette of the Republic of Slovenia, number 87/11 and 84/15)
- Chamber of Advertising of Slovenia, 2009. Code of Advertising Practice of Slovenia. [e-publication]. Accessible at: [http://www.soz.si/sites/default/files/soz\\_sok\\_slo.pdf](http://www.soz.si/sites/default/files/soz_sok_slo.pdf) [1 October 2017]

# Comparative analyses of (digital) marketing in different lifestyle areas – observing patterns

Asist. Prof. Dr. Mojca Gabrijelčič Blenkuš  
Mateja Juvan

NIJZ/WHO Workshop on DIGITAL MARKETING TO CHILDREN  
Methodological challenges for linking public health siloses

Ljubljana, 12<sup>th</sup> October 2017

## Prepared by:

- for **Slovenia**: dr. **Mojca Gabrijelčič Blenkuš**, **Mateja Juvan**, **Helena Koprivnikar**, dr. **Barbara Lovrečič**, dr. **Mercedes Lovrečič**, dr. **Mirna Macur**, dr. **Sandra Radoš Krnel** and dr. **Maja Roškar**, all from National Institute of Public Health Slovenia.
- for **Austria**: **Adelheid Weber**, MSc and Mag. **Andreas Weinseiss**, both from Federal Ministry of Health and Women's Affairs.
- for **Slovakia**: **Dominika Ďuranová**, adviser, Department of crime prevention, Ministry of interior; **Jozef Gabík**, adviser, Department of communication and marketing, Ministry of agriculture and rural development; **Andrea Krajíková**, General Director, International Policy and European Affairs, Ministry of Economy; **Elena Jablonická**, WHO national counterpart, Department of International Relations and European Affairs, Ministry of Health; **Soňa Senderáková-Vančíková**, adviser, Department of Health promotion, Public Health Authority and **Anton Škreko**, General Director, media, audiovisual and copyrights, Ministry of culture.

Are there **any rules** (regulation, coregulation, selfregulation) for ...

... reducing **marketing pressure** of the products to children?

		WORKING AREA						
EXISTENCE OF RULES		ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
YES	REGULATION	✓	✓	✓		✓		
	COREGULATION			✓				
	SELFREGULATION	✓	✓	✓		✓		✓
NO							✓	



... reducing **digital marketing pressure** of the products to children?

		WORKING AREA						
EXISTENCE OF RULES		ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
YES	REGULATION	✓	✓					
	COREGULATION							
	SELFREGULATION	✓	✓	✓		✓		✓
NO							✓	

Legend: Slovenia ✓

Are there **any rules** (regulation, coregulation, selfregulation) for ...

... reducing **marketing pressure** of the products to children?

		WORKING AREA						
EXISTENCE OF RULES		ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
YES	REGULATION	✓ X	✓ X	✓		✓		
	COREGULATION			✓				
	SELFREGULATION	✓ X	✓ X	✓		✓ X	X	✓
NO				X			✓	X



... reducing **digital marketing pressure** of the products to children?

		WORKING AREA						
EXISTENCE OF RULES		ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
YES	REGULATION	✓ X	✓ X					
	COREGULATION							
	SELFREGULATION	✓ X	✓	✓		✓		✓
NO				X			✓	

Legend: Slovenia ✓ Austria X

Are there **any rules** (regulation, coregulation, selfregulation) for ...

... reducing **marketing pressure** of the products to children?

		WORKING AREA						
EXISTENCE OF RULES		ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
YES	REGULATION	✓ X O	✓ X O	✓		✓		O
	COREGULATION			✓				
	SELFREGULATION	✓ X O	✓ X O	✓ O		✓ X O	X	✓ O
NO				X			✓	X



... reducing **digital marketing pressure** of the products to children?

		WORKING AREA						
EXISTENCE OF RULES		ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
YES	REGULATION	✓ X	✓ X O					O
	COREGULATION							
	SELFREGULATION	✓ X O	✓	✓		✓		✓ O
NO				X O			✓	

Legend: Slovenia ✓ Austria X Slovakia O

Are there **any rules** (regulation, coregulation, selfregulation) for ...

... reducing **marketing pressure** of the products to children?

		WORKING AREA						
EXISTENCE OF RULES		ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
YES	REGULATION	✓ X O	✓ X O	✓		✓		O
	COREGULATION			✓				
	SELFREGULATION	✓ X O	✓ X O	✓ O		✓ X O	X	✓ O
NO				X			✓	X



... reducing **digital marketing pressure** of the products to children?

		WORKING AREA						
EXISTENCE OF RULES		ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
YES	REGULATION	✓ X	✓ X O					O
	COREGULATION							
	SELFREGULATION	✓ X O	✓	✓		✓		✓ O
NO				X O			✓	

Legend: Slovenia ✓ Austria X Slovakia O

If yes, what kind of rules exist in the “real world”?

KIND OF RULES	WORKING AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
<b>RESTRICTIONS ON PLACING ON THE MARKET / SALES / OFFERS / ORGANISATION / ...</b>							
Permit-based restrictions (sales / offers / organisation / ...)	✓	✓			✓		
Age-based restrictions (sales / offers / organisation / ...)	✓	✓			✓		
Time restrictions (sales / offers / organisation / ...)	✓						
Marketing channels (prohibition of placing on the market / sales / offers through specific marketing channels)	✓	✓	✓				
Ban on specific products (placing on the market / sales)		✓					
Self-exclusion of player					✓		
<b>ADVERTISING RESTRICTIONS</b>							
Full advertising bans	✓	✓					
Promotional bans		✓					
Bans on sponsorship and donorship		✓					
Restrictions on advertising content	✓		✓		✓		
Specified product labelling and packaging	✓	✓	✓				
Restrictions on advertising through specific marketing channels	✓	✓	✓		✓		✓
Age-based advertising restrictions			✓				
Codes of conduct regarding inappropriate audiovisual commercials			✓				

Legend: Slovenia ✓

If yes, what kind of rules exist in the “real world”?

KIND OF RULES	WORKING AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
<b>RESTRICTIONS ON PLACING ON THE MARKET / SALES / OFFERS / ORGANISATION / ...</b>							
Permit-based restrictions (sales / offers / organisation / ...)	✓ X	✓ X			✓ X	X	
Age-based restrictions (sales / offers / organisation / ...)	✓ X	✓ X			✓ X	X	
Time restrictions (sales / offers / organisation / ...)	✓						
Marketing channels (prohibition of placing on the market / sales / offers through specific marketing channels)	✓ X	✓ X	✓				
Ban on specific products (placing on the market / sales)		✓ X					
Self-exclusion of player					✓ X		
<b>ADVERTISING RESTRICTIONS</b>							
Full advertising bans	✓	✓ X					
Promotional bans		✓ X					
Bans on sponsorship and donorship		✓ X					
Restrictions on advertising content	✓ X	X	✓		✓		
Specified product labelling and packaging	✓	✓ X	✓				
Restrictions on advertising through specific marketing channels	✓ X	✓ X	✓		✓		✓
Age-based advertising restrictions	X		✓				
Codes of conduct regarding inappropriate audiovisual commercials	X		✓				

Legend: Slovenia ✓ Austria X

If yes, what kind of rules exist in the “real world”?

KIND OF RULES	WORKING AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
<b>RESTRICTIONS ON PLACING ON THE MARKET / SALES / OFFERS / ORGANISATION / ...</b>							
Permit-based restrictions (sales / offers / organisation / ...)	✓ X O	✓ X O			✓ X O	X	O
Age-based restrictions (sales / offers / organisation / ...)	✓ X O	✓ X O			✓ X O	X	O
Time restrictions (sales / offers / organisation / ...)	✓ O	O					O
Marketing channels (prohibition of placing on the market / sales / offers through specific marketing channels)	✓ X O	✓ X O	✓				O
Ban on specific products (placing on the market / sales)	O	✓ X O					
Self-exclusion of player					✓ X		
<b>ADVERTISING RESTRICTIONS</b>							
Full advertising bans	✓	✓ X O					
Promotional bans		✓ X O					
Bans on sponsorship and donorship		✓ X O					
Restrictions on advertising content	✓ X O	X O	✓		✓		O
Specified product labelling and packaging	✓	✓ X O	✓ O				
Restrictions on advertising through specific marketing channels	✓ X O	✓ X O	✓		✓		✓ O
Age-based advertising restrictions	X O	O	✓		O		O
Codes of conduct regarding inappropriate audiovisual commercials	X O	O	✓		O		O

Legend: Slovenia ✓ Austria X Slovakia O

If yes, what kind of rules exist in the digital world?

KIND OF RULES	WORKING AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
<b>RESTRICTIONS ON PLACING ON THE MARKET / SALES / OFFERS / ORGANISATION / ...</b>							
Permit-based restrictions (sales / offers / organisation / ...)	✓	✓			✓		
Age-based restrictions (sales / offers / organisation / ...)	✓	✓			✓		
Time restrictions (sales / offers / organisation / ...)							
Marketing channels (prohibition of placing on the market / sales / offers through specific marketing channels)		✓					
Ban on specific products (placing on the market / sales)		✓					
Self-exclusion of player					✓		
<b>ADVERTISING RESTRICTIONS</b>							
Full advertising bans	✓	✓					
Promotional bans		✓					
Bans on sponsorship and donorship		✓					
Restrictions on advertising content	✓		✓		✓		
Specified product labelling and packaging							
Restrictions on advertising through specific marketing channels	✓		✓		✓		✓
Age-based advertising restrictions							
Codes of conduct regarding inappropriate audiovisual commercials							

Legend: Slovenia ✓

If yes, what kind of rules exist in the digital world?

KIND OF RULES	WORKING AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
RESTRICTIONS ON PLACING ON THE MARKET / SALES / OFFERS / ORGANISATION / ...							
Permit-based restrictions (sales / offers / organisation / ...)	✓	✓ X			✓ X		
Age-based restrictions (sales / offers / organisation / ...)	✓ X	✓			✓ X	X	
Time restrictions (sales / offers / organisation / ...)							
Marketing channels (prohibition of placing on the market / sales / offers through specific marketing channels)		✓ X					
Ban on specific products (placing on the market / sales)		✓ X			X		
Self-exclusion of player					✓		
ADVERTISING RESTRICTIONS							
Full advertising bans	✓	✓ X					
Promotional bans		✓ X					
Bans on sponsorship and donorship		✓ X					
Restrictions on advertising content	X	X	✓		✓		
Specified product labelling and packaging		X					
Restrictions on advertising through specific marketing channels	✓ X	X	✓		✓		✓
Age-based advertising restrictions	X						
Codes of conduct regarding inappropriate audiovisual commercials	X						

Legend: Slovenia ✓ Austria X

If yes, what kind of rules exist in the digital world?

KIND OF RULES	WORKING AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
RESTRICTIONS ON PLACING ON THE MARKET / SALES / OFFERS / ORGANISATION / ...							
Permit-based restrictions (sales / offers / organisation / ...)	✓ O	✓ X O			✓ X		
Age-based restrictions (sales / offers / organisation / ...)	✓ X O	✓ O			✓ X	X	
Time restrictions (sales / offers / organisation / ...)							
Marketing channels (prohibition of placing on the market / sales / offers through specific marketing channels)		✓ X					
Ban on specific products (placing on the market / sales)		✓ X			X		
Self-exclusion of player					✓		
ADVERTISING RESTRICTIONS							
Full advertising bans	✓ O	✓ X O					O
Promotional bans		✓ X					
Bans on sponsorship and donorship		✓ X					
Restrictions on advertising content	✓ X	X	✓		✓		
Specified product labelling and packaging		X					
Restrictions on advertising through specific marketing channels	✓ X	X	✓		✓		✓
Age-based advertising restrictions	X O	O					O
Codes of conduct regarding inappropriate audiovisual commercials	X O	O			O		O

Legend: Slovenia ✓ Austria X Slovakia O

## What kind of rules exist in the ...

... "real world"?

ADVERTISING RESTRICTIONS	WORKING AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
Full advertising bans	✓	✓ X O	37				
Promotional bans		✓ X O					
Bans on sponsorship and donorship		✓ X O					
Restrictions on advertising content	✓ X O	X O	✓		✓		O
Specified product labelling and packaging	✓	✓ X O	✓ O				
Restrictions on advertising through specific marketing channels	✓ X O	✓ X O	✓		✓		✓ O
Age-based advertising restrictions	X O	O	✓		O		O
Codes of conduct regarding inappropriate audiovisual commercials	X O	O	✓		O		O

... digital world?

ADVERTISING RESTRICTIONS	WORKING AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
Full advertising bans	✓ O	✓ X O	24				O
Promotional bans		✓ X					
Bans on sponsorship and donorship		✓ X					
Restrictions on advertising content	✓ X	X	✓		✓		
Specified product labelling and packaging		X					
Restrictions on advertising through specific marketing channels	✓ X	X	✓		✓		✓
Age-based advertising restrictions	X O	O					O
Codes of conduct regarding inappropriate audiovisual commercials	X O	O			O		O

Legend: Slovenia ✓ Austria X Slovakia O

## What channels of marketing the existing rules apply to?

MARKETING CHANNELS	WORKING AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
<b>TRADITIONAL MARKETING CHANNELS</b>							
Newspapers, magazines and other printed publications	✓	✓	✓		✓		✓
Brochures, leaflets, etc.	✓	✓	✓		✓		✓
Radio	✓	✓	✓		✓		✓
Television	✓	✓	✓		✓		✓
Cinemas	✓	✓	✓		✓		✓
Posters and other advertising surfaces and media in public spaces and at publicly visible locations – including moving picturegraphics	✓	✓	✓		✓		✓
Roadside billboards, boards, posters and illuminated signs	✓						
Billboards, boards, posters and illuminated signs located within a 300-metre range from schools	✓						
Buildings and land used for education and healthcare purposes	✓						
Automatic vending machines	✓	✓	✓				
Movable points of sale		✓					
<b>DIGITAL MARKETING CHANNELS</b>							
Electronic and video carriers	✓	✓	✓		✓		✓
E-mail, mobile phones, etc.	✓	✓	✓		✓		✓
Other electronic media (the Internet, using dedicated online advertising space, such as advertising banners, textual advertisements, or non-dedicated online space for sending virtual advertising messages via e-mail or other channels, as well as for sharing video and other advertising content on social portals, including other content not posted on the advertiser's website, but which has clearly been published by the advertiser)	✓	✓	✓		✓		✓
Information society service		✓					

Legend: Slovenia ✓

**What channels of marketing the existing rules apply to?**

MARKETING CHANNELS	WORKING AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
<b>TRADITIONAL MARKETING CHANNELS</b>							
Newspapers, magazines and other printed publications	✓ X	✓ X	✓		✓		✓
Brochures, leaflets, etc.	✓ X	✓ X	✓		✓		✓
Radio	✓ X	✓ X	✓		✓		✓
Television	✓ X	✓ X	✓		✓		✓
Cinemas	✓ X	✓ X	✓		✓		✓
Posters and other advertising surfaces and media in public spaces and at publicly visible locations – including moving picturegraphics	✓ X	✓ X	✓		✓		✓
Roadside billboards, boards, posters and illuminated signs	✓ X	X					
Billboards, boards, posters and illuminated signs located within a 300-metre range from schools	✓ X	X					
Buildings and land used for education and healthcare purposes	✓ X	X					
Automatic vending machines	✓	✓	✓				
Movable points of sale	X	✓					
<b>DIGITAL MARKETING CHANNELS</b>							
Electronic and video carriers	✓ X	✓ X	✓		✓		✓
E-mail, mobile phones, etc.	✓ X	✓ X	✓		✓		✓
Other electronic media (the Internet, using dedicated online advertising space, such as advertising banners, textual advertisements, or non-dedicated online space for sending virtual advertising messages via e-mail or other channels, as well as for sharing video and other advertising content on social portals, including other content not posted on the advertiser's website, but which has clearly been published by the advertiser)	✓ X	✓ X	✓		✓		✓
Information society service	X	✓ X					

Legend: Slovenia ✓ Austria X

**What channels of marketing the existing rules apply to?**

MARKETING CHANNELS	WORKING AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
<b>TRADITIONAL MARKETING CHANNELS</b>							
Newspapers, magazines and other printed publications	✓ X O	✓ X O	✓		✓		✓ O
Brochures, leaflets, etc.	✓ X O	✓ X O	✓		✓		✓ O
Radio	✓ X O	✓ X O	✓		✓		✓ O
Television	✓ X O	✓ X O	✓		✓		✓ O
Cinemas	✓ X O	✓ X O	✓		✓		✓ O
Posters and other advertising surfaces and media in public spaces and at publicly visible locations – including moving picturegraphics	✓ X O	✓ X O	✓		✓		✓ O
Roadside billboards, boards, posters and illuminated signs	✓ X O	X O					O
Billboards, boards, posters and illuminated signs located within a 300-metre range from schools	✓ X O	X O					O
Buildings and land used for education and healthcare purposes	✓ X O	X O					O
Automatic vending machines	✓	✓	✓ (O Planned)				O
Movable points of sale	X O	✓ O					O
<b>DIGITAL MARKETING CHANNELS</b>							
Electronic and video carriers	✓ X	✓ X	✓		✓		✓ O
E-mail, mobile phones, etc.	✓ X	✓ X	✓		✓		✓ O
Other electronic media (the Internet, using dedicated online advertising space, such as advertising banners, textual advertisements, or non-dedicated online space for sending virtual advertising messages via e-mail or other channels, as well as for sharing video and other advertising content on social portals, including other content not posted on the advertiser's website, but which has clearly been published by the advertiser)	✓ X	✓ X	✓		✓		✓ O
Information society service	X	✓ X					O

Legend: Slovenia ✓ Austria X Slovakia O

What are the main challenges in implementation of rules for reducing or restricting pressure in digital marketing (definition of target group, age limitation, criteria, distribution channels, data privacy, tracking, monitoring, ...)?

MAIN CHALLENGES	WORKING AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
<b>TARGET GROUP</b>							
Definition of children and adolescents	✓		✓		✓	✓	
Persons spending much of their time at home with a consequential susceptibility to overuse of digital media (secondary school and university dropouts, unemployed, persons incapable to work)					✓	✓	
<b>DISTRIBUTION CHANNELS</b>							
Regulation of the media aiming primarily at children and adolescents			✓		✓	✓	
Regulation of the Internet, the Virtual World and the new digital media <u>not yet covered by the existing legislation</u>	✓				✓	✓	
Restrictions on <u>advertising within computer and video games</u>					✓	✓	

Legend: Slovenia ✓

What are the main challenges in implementation of rules for reducing or restricting pressure in digital marketing (definition of target group, age limitation, criteria, distribution channels, data privacy, tracking, monitoring, ...)?

MAIN CHALLENGES	WORKING AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
<b>TARGET GROUP</b>							
Definition of children and adolescents	✓		✓ X		✓	✓	X
Persons spending much of their time at home with a consequential susceptibility to overuse of digital media (secondary school and university dropouts, unemployed, persons incapable to work)					✓	✓	
<b>DISTRIBUTION CHANNELS</b>							
Regulation of the media aiming primarily at children and adolescents			✓ X		✓	✓	X
Regulation of the Internet, the Virtual World and the new digital media <u>not yet covered by the existing legislation</u>	✓ X	X	X		✓ X	✓	X
Restrictions on <u>advertising within computer and video games</u>			X		✓	✓	X

Legend: Slovenia ✓ Austria X

What are the main challenges in implementation of rules for reducing or restricting pressure in digital marketing (definition of target group, age limitation, criteria, distribution channels, data privacy, tracking, monitoring, ...)?

MAIN CHALLENGES	WORKING AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
<b>TARGET GROUP</b>							
Definition of children and adolescents	✓	O	✓ X O		✓ O	✓	X
Persons spending much of their time at home with a consequential susceptibility to overuse of digital media (secondary school and university dropouts, unemployed, persons incapable to work)					✓ O	✓ O	
<b>DISTRIBUTION CHANNELS</b>							
Regulation of the media aiming primarily at children and adolescents	O	O	✓ X O		✓ O	✓ O	X
Regulation of the Internet, the Virtual World and the new digital media not yet covered by the existing legislation	✓ X O	X O	X O		✓ X O	✓ O	X
Restrictions on advertising within computer and video games	O	O	X O		✓ O	✓ O	X

Legend: Slovenia ✓ Austria X Slovakia O

MAIN ISSUES	AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
Violations of advertising provisions	✓ O	✓ O					
Violations of introduced restrictions	✓ O	O	✓ X				
Monitoring and evaluation violations of introduced restrictions	✓	O	O		O	O	X O
Existence of illegal forms, globalisation and its impact on tools for electronic communication	✓ X	X			X		O
Online sales and advertising by companies headquartered in other countries	✓ O	X O			X		O
Outdated legislation: (digital) marketing channels not covered by the legislation introducing marketing restrictions simply because they were developed after the adoption of the relevant legislative acts	✓ O	O	O				
Marketing self-regulation is not successful	✓	O	✓ X O				X
Regulation of online sales (looking, for example, into ways alcohol purchases performed by minors are addressed)	✓ O				X	X	O
The industry avails itself of problematic forms of advertising, i.e. surreptitious advertising (e.g. with brand name logos)	✓		X				X O
Introduce a full ban on advertising is missing	✓ O		X				X
Ban all sponsorships and donorships aimed at the promotion is missing	✓ O		X				
Special attention to be given to a ban on sales promotion activities	✓ O						
Establish a system detecting, monitoring and evaluating marketing communication messages in all the media, including the world wide web and mobile applications, to guarantee a better surveillance	✓ O	O	✓ X O				X
More knowledge and studies of the impact of advertising of product on (mental and physical) health are missing	✓ O	O	O				
'Ethical advertising' does not help (addicts cannot be brought to their senses by 'ethical' advertising)					✓	✓	

Legend: Slovenia ✓ Austria X Slovakia O

**What are the key obstacles (inhibitory factors) for improvement of the situation? (7-9)**

KEY OBSTACLES	WORKING AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
Omnipresent advertising	O		✓XO				X
Non-existent / inappropriate (outdated) national and EU legislation	✓O		✓XO		✓	✓	X
Inappropriate / inconsistent implementation of the existing legislation	✓	✓					
Low legal penalties	✓						
Need for political will and consensus	✓O	O	✓XO		O		XO
Need for a large societal consensus	✓O	O	✓X				X
Lack of awareness (and/or knowledge) of health impacts	✓		✓XO			✓	X
Poor labelling (without health warnings or a list of ingredients and composition)	✓O						
Product definitions are missing	✓		X				
Advertising panels may be adopting decisions that are perceived as problematic from the point of view of public health	✓		X				X
Indicate the need for the advertising practice of industry for appropriate knowledge, as well as human and financial resources	✓						
In general is profitability more important than regulation		O	✓XO		✓	✓	X
Non-functioning legal restrictions			X		✓		
Difficulties in implementation of legal restrictions	O	O	XO		✓		X
The Internet remains an unregulated territory where advertisements "attack from behind every corner" – on all the websites	X	X	✓XO		✓X	✓	X
Addicts do not respond to logical arguments, their addicted brain works differently, they are incapable of thinking about the consequences of their behaviour – working with them is therefore particularly difficult					✓	✓	
Addicts cannot be 'brought to their senses' by 'ethical' advertising					✓	✓	

Legend: Slovenia ✓ Austria X Slovakia O

**What are the key enablers (facilitating factors) for improvement of the situation?**

KEY ENABLERS	WORKING AREA						
	ALCOHOL	TOBACCO	NUTRITION	PHYSICAL ACTIVITY	GAMBLING	GAMING	GENERAL
Mobilisation of Public opinion polls	✓XO	✓XO					
Bringing forward consumers' and citizens' rights	✓X	X	XO				
Raising the awareness of consumers and citizens	✓XO	XO	X		X		X
Informing the general public about health impacts and their consequences	✓XO	X	XO	O	XO	O	XO
Better intersectoral cooperation	XO	X	✓XO	O	XO	O	XO
Better international cooperation	✓X	X	✓X		X		
More comprehensive and effective prevention, field work, advisory services	XO	XO	XO	O	✓O	✓O	O

LEFT – RIGHT DIFFERENCE

Legend: Slovenia ✓ Austria X Slovakia O

## What are the most promising steps forward for reducing or restricting pressure in digital marketing?

### Slovenia

WORKING AREA	RECOMMENDATIONS FOR FURTHER STEPS
GENERAL	<ul style="list-style-type: none"> <li>- uniform definitions of specific areas (using the same denominators) and the upgrading of the existing definitions</li> <li>- defining digital marketing as an integrated health and lifestyle determinant (CNDs); defining possible common starting points and activities</li> <li>- determining the power and scope of marketing channels for all the possible areas</li> <li>- raising the awareness and increasing the knowledge in the expert community</li> <li>- systematic communication about the listed topics with the general population, as well as with different target groups</li> </ul>
ALCOHOL	<ul style="list-style-type: none"> <li>- raising the awareness of consumers and citizens</li> <li>- recast of outdated and adoption of new EU directives and regulations</li> <li>- updating poor and inappropriate legislation, as well as adopting new elements of the national legislation when so needed optimising the implementation of the existing legislation</li> <li>- a review of the applications submitted by advertising chambers and panels</li> <li>- cooperation with other EU member states in the field of marketing restrictions</li> <li>- removing alcohol from the list of food products</li> <li>- estimate of the state of affairs and monitoring of the practice within the industry, with a focus on digital advertising</li> <li>- estimate of the response of the population and its subgroups to advertising, with special attention being paid to digital advertising</li> <li>- estimate of the impact of the social media and media marketing on alcohol consumption and related health consequences</li> <li>- the industry's estimate of compliance with self-regulation and legislation (national and in other countries), possible differences in advertising between domestic and foreign industries (e.g. emotionally charged messages, apparent social responsibility)</li> <li>- estimate of short- and long-term marketing impact on public health</li> <li>- raising the awareness of the general public through information about the harmful nature of alcohol consumption (no threshold), particularly in children and adolescents because of the impact on their brain development</li> <li>- raising the awareness of the general public about marketing and its characteristics within the parallel virtual world, together with strategies and tactics needed to understand these messages and develop resilience</li> <li>- special emphasis on programmes promoting lifestyle change (acceptable public image, especially for men) and intergenerational transmission of behavioural patterns</li> <li>- regular monitoring and consideration of the public's stance on arguments advocating restrictions on alcohol consumption and the prevention of (harmful) alcohol use</li> </ul>
TOBACCO	<ul style="list-style-type: none"> <li>- optimising the implementation of the existing legislation</li> </ul>
NUTRITION	<ul style="list-style-type: none"> <li>- raising the awareness of consumers and citizens, different stakeholder groups and policy-decision makers</li> <li>- intersectoral cooperation with improved multidisciplinary competencies</li> <li>- cooperation with other EU member states and with WHO EURO region and globally with the WHO level in the field of marketing restrictions in all lifestyle areas</li> <li>- developing common understanding of digital marketing injects and particular mechanisms at the individual and societal level</li> <li>- participatory agenda for reducing marketing pressure to children with defined responsibilities of all stakeholder groups</li> <li>- transparent, independent and regular monitoring and evaluation of digital marketing and relevant measures</li> </ul>
GAMBLING and GAMING	<ul style="list-style-type: none"> <li>- estimate of the state of affairs</li> <li>- prevention, field work, advisory services</li> <li>- recast of outdated and adoption of new EU directives and regulations</li> </ul>

## What are the most promising steps forward for reducing or restricting pressure in digital marketing?

### Austria

WORKING AREA	RECOMMENDATIONS FOR FURTHER STEPS
TOBACCO	<ul style="list-style-type: none"> <li>- ban of distance sales</li> <li>- complete ban of advertising, sponsoring, marketing</li> </ul>
NUTRITION	<ul style="list-style-type: none"> <li>- AUT welcomes the revision of the AVM-Directive. The final Directive will be an EU-wide mandatory framework, that will help at implementing national legislatives.</li> </ul>

### Slovakia

WORKING AREA	RECOMMENDATIONS FOR FURTHER STEPS
GENERAL - plus Mental Health	<p><b>Interdisciplinary character</b> of efforts to reduce pressure in digital marketing and more generally harmful effects, extremism and violence on internet. With reference to the questionnaire we have consulted Ministries of agriculture, economy, culture, interior and Public Health Authority.</p> <p>Example: ongoing efforts in the area of prevention of risky behavior Ministry of Health together with Ministry of Interior and other involved stakeholders will organize in January 2018 a joint workshop within the process of creating common interdisciplinary standards for the protection of young people's health.</p> <p>Ministry of Interior (Mental Health and risky behavior prevention), example - the collection of data on hate speech/ extremism In 2015, out of the 30 cases detected, up to 15 cases were committed within the virtual space, that is, they were committed in connection with activities on the Internet and various social networks (especially Facebook). - In the year 2016, 58 cases of extremism crimes were detected within the Slovak Republic, out of which 21 were cleared up. The method of committing this type of crime was also shifted in 2016 from a "street" to the Internet and social networks. Criminal activities committed in the virtual environment were characterized by hate speech, assertions, and sympathy for various faulty individuals or objects. The Slovak Republic sees extremism and hate speech as a modern phenomenon that needs to be addressed adequately. In June 2016, The Committee for the Prevention and Elimination of Racism, Xenophobia, Anti-Semitism and Other Forms of Intolerance has set up a working group on internet hate speech, which is also working to create a specific data collection system in this area. The source of information is the possibility to report such cases to the public either by email: <a href="mailto:extrem@minv.sk">extrem@minv.sk</a> (NAKA operator) or <a href="http://digiq.sk/nahlas-to">http://digiq.sk/nahlas-to</a></p> <p>Ministry of Economy: As a challenge for the future and a step forward, we see scope for setting up rules on cooperation between supervisory authorities and the social media. The problem may be that of spreading inappropriate advertising through social networks, as the supervisory authorities do not have any means of tracking the dissemination of such advertising. Therefore, we consider it appropriate to adopt measures that would allow the blocking of illegal advertising on social networks.</p>

What are the most promising steps forward for reducing or restricting pressure in digital marketing?

Slovakia

WORKING AREA	RECOMMENDATIONS FOR FURTHER STEPS
GENERAL - plus Mental Health	<p>Ministry of Agriculture and Rural Development: Current challenges of the impact of advertising and marketing on the child population are likely to be the responsibility of several sectors, and the tasks arising from these challenges also need to be addressed in the context of wider inter-agency cooperation.</p> <p>From the point of view of substance, we identified the potentially problematic impact of advertising and marketing, especially in the area of eating the under-served population, such as failing to respect the need to reduce total salt, sugar, or increase in fruit and vegetable consumption.</p> <p>The agriculture sector has long been developing a wide range of activities in this area. A good example is the "Talks about eating" project, whose primary task is to raise awareness of food security and healthy nutrition. We also consider the School Fruit and Vegetables School and School Milk Program, which since 1 August 2017 have been integrated into one legal framework to increase efficiency. The aim is, above all, to improve the eating habits of children.</p> <p>In the framework of future steps, the Ministry of Agriculture and Rural Development is ready to cooperate with involved stakeholders at the level of professional discussion in order to solve new challenges in this area.</p> <p>Ministry of Culture The limitations introduced by the Broadcasting and Retransmission Act for the protection of minors are, as mentioned above, taken from the Audiovisual Media Services Directive. The directive is currently under intense negotiations on its review. Since the Audiovisual Media Services Directive on the Protection of Minors in Audiovisual Media Services establishes a primary regulatory framework at European Union level, which will be applied with the greatest possible likelihood to video sharing platforms in the near future, it will be necessary to transpose changes that the revised text in the area of protection of minors.</p>
ALCOHOL	<p>Ministry of Health/ Public Health Authority: - need for stricter advertising rules</p>
TOBACCO	<p>- to update legislation for new marketing channels - to ensure the controllability of violation of rules in the digital world</p>
NUTRITION	<p>- to increase number of studies of the impact of product advertising on health - raise the awareness of citizens' rights concerning advertising - consistent prosecution of violations of rules</p> <p>An effective instrument would be a single EU restrictive legislation with regard to digital marketing targeting the child population</p>
GAMBLING	- prevention, field work, advisory services
GAMING	- prevention, field work, advisory services



Let's join public health capacities  
and do something together 😊

## **8 Opportunities and barriers for policy interventions**

*(Cristina Chiotan, EuroHealthnet)*

The policy interventions at the EU and national/regional level can be broadly divided into:

- mandatory policy, i.e. legislation/directive or regulation;
- voluntary policy/agreements, i.e. national level schemes of self and co-regulation.

The national laws or EU Directives are enforced by controls applied by the public sectors for example, 20% limit of advertising time as mentioned in the EU Audio Video Media Services Directive (AVMSD). For this type of policy impact assessments and continuous monitoring are crucial for implementation.

Among the voluntary agreements the most commonly used is the self and co-regulation involving commitments of the industry and other relevant stakeholders towards achieving specific objectives. Recommendations and guidelines are also often issued at EU level being proposed by the Commission and approved by the Council.

Within the legislation the EU and countries can use economic/fiscal measures, such as:

- Taxation: Taxing products or processes that are harmful, or reducing taxation of products that are beneficial;
- Subsidies: financial support to SMEs or small enterprises that support/promote healthy products and services;
- Fees and user charges- charging to punish deviations from the law/data protection, etc.;
- Investments in Research and Development –improve knowledge on health impacts;
- Investments in Education and Training (school, higher education/university, life-long learning) – investments in digital and commercial health literacy.

Policy implementation can be supported through various actions/interventions of communication, marketing of education campaigns:

- public reporting of deviations (i.e. disclosure about companies non-compliant)
- social marketing - media campaigns
- advice/information centers for adolescents and parents - provide information on digital health literacy and negative impacts.

To ensure maximum implementation the legislative measures could be endorsed by economic/fiscal measures and accompanied by interventions and actions.

An example of EU policy is represented by the new proposal of the European Commission to revise the AVMSD. Being driven by the need for a better balance of rules the proposal introduces flexibility when restrictions only applicable to TV are no longer justified. At the same time, it aims to ensure that consumers will be sufficiently protected in the on-demand and Internet world. While strengthening the country of origin principle (i.e. simplify the rules

to determine the country having jurisdiction) it establishes the obligation of the Member States to inform about what providers are under their jurisdiction and maintaining an up-to-date database to ensure transparency.

In terms of commercial communications, it maintains the strict 20% limit on advertising time, but gives broadcasters more flexibility as to when ads can be shown, and allows more flexibility in putting product placement and sponsorship. In relation with the protection of minors, the proposed modifications aim at simplifying the obligation to protect minors against harmful content, with everything that 'may be harmful' should be restricted on all services and the most harmful content shall be subject to the strictest measures, such as PIN codes and encryption.

In relation with protecting the most vulnerable the proposal encourages the adoption of self- and co-regulation for the existing rules seeking to protect the most vulnerable (alcohol advertising, fatty food, minors, etc.).

A study on “Effectiveness of self- and co-regulation in the context of implementing the Audiovisual Media Services Directive (AVMSD)” published in 2016<sup>1</sup> have evaluated the application of principles in national schemes in relation with protection of minors from harmful audiovisual content television and in on-demand Audio Media Services and on commercial communication in both television broadcasting and in on-demand AMS. The study has identified and assessed 33 self- and co-regulatory schemes identified in 25 MS.

The findings have shown that as regards participants, most participants were from industry with consumer and civil society groups often not represented. As regards the openness of participants there were rare cases where stakeholders felt excluded or information withheld, however the information was kept overall in a closed group. In terms of the good faith of participants, it was difficult to assess if real effort or commitment was made with no possibility to determine the capacity of each stakeholder involved. There was a good legal compliance in vast majority of schemes.

In most of the schemes analysed there was an overall general policy goal with less SMART objectives and indicators and evaluate which made it difficult to evaluate the impact of the scheme. There was also a lack of systematic process for improvement, and often no monitoring systems in place with few systems which assessed regularly performance and impact or identify areas for improvement.

The study concluded that national self of co-regulation schemes are often not formalised or established explicitly. There are no formal objectives, monitoring processes or evaluations

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<sup>1</sup> <https://ec.europa.eu/digital-single-market/en/news/audiovisual-and-media-services-directive-self-and-co-regulation-study>

which weakness their effectiveness and impact. Out of 33 schemes identified and evaluated only four best practice cases were identified that can confirm that effective self- and co-regulation schemes, which fulfil the essential criteria of well-functioning self and co-regulation can be very effective.

**Key Sources:**

- Directive 2010/13/EU of the European Parliament and of the Council of 10 March 2010 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive). Accessible at: <http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32010L0013> [1 October 2017]
- Panteia and VVA, 2016. *Effectiveness of self-and co-regulation in the context of implementing the AVMS Directive*. A study prepared for the European Commission DG Communications Networks, Content & Technology. Luxembourg: Publications Office of the European Union. Accessible at: <https://ec.europa.eu/digital-single-market/en/news/audiovisual-and-media-services-directive-self-and-co-regulation-study> [1 October 2017]
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# Opportunities and barriers for policy interventions

Cristina Chiotan, Policy Senior Coordinator



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EUROPEAN PARTNERSHIP FOR IMPROVING HEALTH, EQUITY & WELLBEING

## ABOUT EUROHEALTHNET

### Objectives & key themes:

- Reducing Health Inequalities
- Combatting NCDs
- Health Promotion for sustainable health systems
  - SDH approach, HiAP
  - Life-course approach (children/ageing)
  - Sustainable development approach (social, environmental and economic)



## Regulation/Legislation/Guidelines

Setting **rules and targets** (command) and ensuring that they are enforced (control) [Public sector]

Laws, directives

E.g. *20% limit advertising time*

**Impact assessments** of new legislation or investment initiatives

**Voluntary agreements** (non mandatory): initiatives where firms, groups of companies or sectors agree to improve conduct  
EU platforms, national level schemes/commitments, self and co-regulation

**Guidelines:** non mandatory



## Economic/fiscal measures

**Taxation:** Taxing products or processes that are harmful, or reducing them where beneficial;

**Subsidies:** financial support to SMEs or small enterprises that support/promote healthy products and services

**Fees and user charges-** charging to punish deviations from the law/data protection, etc.

**Investments in Research and Development** –improve knowledge on health impacts

**Investments in Education and Training (school, higher education/university, life-long learning)** – investments in digital and commercial health literacy



## Policy support for actions/interventions

### Communication/Marketing/Guidelines(non mandatory)/Information

- deviations reporting –disclosure about companies non-compliant
- social marketing - media campaigns

### Service Provision- support services

- advice/information centres for adolescents and parents - provide information on digital health literacy and negative impacts;
- Education and Training in schools to improve health literacy, sustainability

- Strengthen and invest in **monitoring**



## Audiovisual Media Services Directive (AVMSD)

a media framework for the 21<sup>st</sup> century

#AVMSD #DigitalSingleMarket

### Why?

For a better balance of rules



### Context

Before



Average TV viewing time is decreasing.  
Young people's TV viewing time has dropped by 7.5% and is half that of the average viewer

Now



Videos on the Internet



TV channels target more and more foreign markets



Industry faces fragmented rules on the share of European content across the EU



On average 31% of VoD services available in one EU Member State are established in another Member State



Need for more independence of regulators from government & industry

## An example: the EC proposal AVMSD

- **Country of origin principle:** determine country jurisdiction over provider and share info via database;
- **Commercial communications:** 20% limit advertising time, more flexibility on when, product placement and sponsorship; adoption of self and co-regulation to protect the most vulnerable (alcohol ads, fatty foods, minors, etc.)
- **Prohibition of hate speech** – expressions of racism and xenophobia
- **Protection of minors:** everything that may be harmful should be restricted on all services.
- **Video-sharing platform:** only when it comes to combat hate speech and dissemination of harmful content to minors.



## Principles for Better Self- and Co-Regulation (1)

- **Participants:** all possible parties have come on board, each fully accountable and respected for their contributions.
- **Openness:** envisaged actions prepared openly; include the involvement of any interested parties: public authorities, enterprises, legislators, regulators and civil society.
- **Good faith:** bring all the information available; commit real effort to success; activities outside are coherent with the commitment and they can withdraw



## Principles for Better Self- and Co-Regulation (2)

- **Objectives:** set out clearly and unambiguously; use well-defined baselines, include targets and indicators allowing an evaluation of the impact.
- **Legal compliance:** only applicable law and fundamental rights from the EU and national law.
- **Iterative improvements:** aim for a prompt start, with accountability and an iterative process of "learning by doing"; sustained interaction between all participants; annual progress checked.



## Principles for Better Self- and Co-Regulation (3)

- **Monitoring:** sufficiently open and autonomous; each participant monitor its performance against agreed targets; public shared results  
Evaluation = action concluded, improved or replaced
- **Disagreements** inevitably arise involving either participants or others. As part of the iterative process of improvement, such disputes should receive timely attention, with a view to resolving them. These procedures may be confidential.
- **Financing:** participants to the action will provide the means necessary to fulfil the commitments; public support possible.



## Study on the AVMSD 2010 (1)

“Effectiveness of self- and co-regulation in the context of implementing the Audiovisual Media Services Directive (AVMSD)” (2016):

### Evaluate application of principles in national schemes:

- on protection of minors from harmful audiovisual content television and in on-demand AMS
- on commercial communication in both television broadcasting and in on-demand AMS

**33 self- and co-regulatory schemes identified in 25 MS**



## Study on the AVMSD 2010 (2)

- **Participants:** consumer and civil society groups often not represented.
- **Openness:** rare cases where stakeholders felt excluded or information withheld; overall closed group
- **Good faith:** difficult to determine if real effort or commitment was made (exact capacities of each stakeholder involved was not known).
- **Objectives:** a general policy goal with less SMART objectives, including indicators to monitor and evaluate



## Study on the AVMSD 2010 (3)

- **Legal compliance:** upheld in the vast majority of the schemes
- **Iterative improvements:** lack of systematic process for improvement
- **Monitoring:** There is often no system in place which specifically monitors the scheme objectives, and indicators and targets are often missing.
- **Evaluation:** Few systems to assess regularly performance, areas for improvement, and broader impact (appears to be due to the lack of SMART objectives with appropriate indicators and targets)



## Study on the AVMSD 2010 (4)

- **Resolving disagreements:** complaints resolution system
- **Financing:** in many cases membership fees are the main source of financing; government support; offering services to participants; provision of a copy advice for an advertisement or the classification of a programme according to a classification system.



# Thank you!

- Questions?

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## 9 Short statement on technological options in Slovenia

*(Petra Zupančič, Agency for communication networks and services of the Republic of Slovenia)*

### Abstract

Agency for communication networks and services of the Republic of Slovenia (AKOS) is an independent body, which regulates electronic media on the basis of the Media Act and the Audiovisual Media Services Act.

The regulation/co-regulation of advertising to children in Slovenia applies exclusively in the field of traditional audiovisual (AV) media - television and radio. Social networks, internet platforms etc. are not defined as media according to current media legislation and therefore remain deregulated. Digital marketing is regulated only by self-regulatory codes. Co-regulation and self-regulation represent the future of the tendency to protect children from inappropriate advertising content in the digital world (in this direction also the current reform of the EU AVMS Directive), however individual countries report that the principle of self-regulation and voluntary codes do not produce the expected results.

AKOS also presented the regulatory practices of the EU Member States for the AV commercial messages for HFSS food in children's program and for alcohol. There is no uniform regulatory practice.

In the end, AKOS emphasized the role of regulatory agency in developing media/advertising literacy for children and adults - skills, knowledge and understanding, which enables effective and safe use of the media. Media education should be prioritized and placed in the school curriculum.

AKOS's practice and contribution is in accordance with comparable EU legislative practice and its recommendations/baseline considerations/illuminations have substantial weight.

### KeySources:

- Media Act (Official Gazette of the Republic of Slovenia, number 110/06, 36/08, 77/10, 90/10, 87/11, 47/12, 47/15, 22/16 and 39/1615/03)
- Audiovisual Media Services Act (Official Gazette of the Republic of Slovenia, number 87/11 and 84/15)

## Presentations



### Regulatory framework for advertising to children in (traditional) media

(\*in jurisdiction of the regulator for electronic media *Agency for communication networks and services of the Republic of Slovenia* (AKOS) on the basis of the Media Act and Audiovisual Media Services Act)

#### → WHERE WE ARE:

- (Co-)regulation of advertising to children exclusively in the field of **traditional audiovisual (AV) media – television (TV) and radio** (in accordance with current media legislation, social networks, internet platforms etc. are not defined as media and therefore remain deregulated; digital marketing is regulated by self-regulatory codes) – media regulation in relation to child protection in the field of advertising includes only of general principles regarding AV commercial messages and more specifically for high fat, salt, sugar (HFSS) foods (obligation *per se*) \*see below

‡ issue: children are influenced by different media in different age periods – preschool children may be mainly addressed by TV, older children mainly move to other platforms (social networks, YouTube)

→ **AV commercial messages to minors** (product placement in content for children is not allowed; SEPARATION PRINCIPLE – advertising content clearly separated from other content) must not:

‡ issue: new, »soft« advertising techniques, e.g. »merchandising« – AV and food industry networking, »brand integration« – licensed cartoon characters in advertisements for HFSS food, »advergames«, »video advertising« etc.

- cause physical, mental or moral damage
- encourage them to buy or lease products due to their inexperience
- encourage them to persuade their parents to buy advertised goods
- show their peers in dangerous situations

- Provider of AV media service formulates the **RULES OF CONDUCT regarding inappropriate AV commercial messages for HFSS food** in/along children's program content, according to nutrition guidelines, announced by the minister for health. The provider must publish the Rules and forward them to the ministry, responsible for media, and to AKOS.

‡ issue: other programme content not primarily for children, although children represent an important proportion of the audience; broadcasted in time periods, when children follow the media, e.g. family films

‡ issue: HFSS food is still advertised to children, very small proportion of advertisement industry promotes healthy food (e.g. according to Consumers' Association of Slovenia 50 % of the advertised breakfast cereals in Slovenia contain more than 30g of sugar/100g of the product)

‡ issue: what is the purpose of showing text messages promoting healthy lifestyle in the programme (for children) together with advertisements for HFSS food

→ WHERE ARE WE GOING:

- **Co-regulation, self-regulation** (collective responsibility; e.g. Code of Advertising Practice of Slovenia) – represent the future of tendency to protect children from inappropriate digital advertising (in this direction also the current revision of the Audiovisual Media Services Directive)

‡ issue: individual countries report that self-regulation and voluntary codes are not effective in achieving of the desired results



**MEDIA/ADVERTISING LITERACY** – skills, knowledge and understanding that enable users to efficiently and safely use the media. Media regulators co-create web portals, cooperate with market stakeholders, support educational campaigns and **awareness raising activities in educational institutions** (for both children and teachers) – creating SCHOOL CURRICULUM in compliance with the competent authorities.

**New advertising techniques** (»digital marketing« – SEPARATION PRINCIPLE no longer applies) – personalization, interaction, integration – »brand integration/placement«, »advergames«, »video advertising«, »advertising connected to social media« (profiled targeting, so-called online »influencer« – blogs, vlogs), online banner, virtual world itd.

→ their subtle and contextual (merging editorial content with advertising content) nature necessarily requires

- 1) an informed individual/child who recognizes sublimated forms of media messages that address him as a consumer,
- 2) on platforms that can not be regulated by traditional regulation measures

→ REGULATORY PRACTICE OF EU COUNTRIES – AV COMMERCIAL MESSAGES FOR HFSS FOOD IN CHILDREN'S PROGRAM (26/28 Member States):

1. **Legal regulation/co-regulation**

– **RULES OF CONDUCT regarding inappropriate AV commercial messages for HFSS food** in/along children's program content (public broadcasting service and commercial media):

- Austria (prohibition of any advertising in/directly before/after)
- Belgium (French area) (conditionally in health legislation gives the king the power to act)
- Cyprus
- Estonia
- France (signed food agreement between publishers, advertisers and TV producers under the ministry of health, culture and media regulator; also an agreement on promotion of a healthy lifestyle – obligatory publication of the message on a healthy diet)
- Germany
- Romania (participation of celebrities in advertisements for children under the age of 12 years is not allowed; promotional advertisements for a healthy lifestyle)
- Slovenia
- Spain

– **It is not allowed to encourage consuming HFSS food by AV commercial messages (legal requirement):**

- Belgium (Flemish area)
- Germany

– **AV commercial messages for HFSS food are not allowed in children's program:**

- Denmark (a ban on advertising within program content for children under the age of 13 years)

- Ireland (allowed in other programs, but insofar as they address children under certain conditions (see below) and to the maximum extent of 25% of advertising time; obligatory publication of the message on a healthy diet; ban on »pester power«; participation of celebrities for advertising purposes is not allowed)
- Malta (30 min before and 30 min after children's program),
- Poland,
- Sweden (general ban on advertising to children)
- Great Britain (absolute ban in/during/after children's programs, in specialized children's programs and in program content for children under the age of 16 years; obligatory publication of the message on a healthy diet; absolute ban on promotional placement; ban on »pester power«; in advertisements for preschool and primary school children no promotional offers are allowed; participation of celebrities for advertising purposes is not allowed)

## 2. **Self-regulation**

### – **ADVERTISING/ETHICAL CODES OF AV MEDIA SERVICES PROVIDERS, ADVERTISERS, FOOD INDUSTRY:**

- Austria
- Belgium (French area)
- Belgium (Flemish area)
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark (code of conduct applies for traditional and so-called new media)
- Estonia
- Finland
- Germany (including digital marketing)
- Greece
- Italy
- Ireland (only video on demand)
- Latvia
- Lithuania
- Malta
- Netherlands
- Poland

- Portugal
- Romania
- Slovakia (not specifically for children)
- Spain

→ REGULATORY PRACTICE OF EU COUNTRIES – AV COMMERCIAL MESSAGES FOR ALCOHOL  
(23/28 Member States):

\*in jurisdiction of the media regulators

1. **Absolute ban on alcohol advertising (with time exceptions):**

- Belgium (Flemish area) (before/after children's program)
- Estonia (applies to public broadcasting service; for other providers, ban on advertising between 7.00 and 21.00)
- France
- Hungary (applies to public broadcasting service; absolute ban on advertising spirits between 18.30 and 21.30)
- Lithuania (between 18.00 and 23.00)
- Malta (between 6.00 and 21.00)
- Nizozemska (between 6.00 and 21.00)
- Poland (exceptions: beer between 20.00 and 6.00, sports program content)
- Portugal (between 7.00 and 22.30)
- Sweden
- Great Britain (before/during/after the program for young audience)

2. **Absolute ban on spirits advertising (with time exceptions):**

- Austria
- Belgium (French area) (applies to public broadcasting service; provider who advertises alcohol must ensure broadcasting time to the same extent for preventive awareness raising campaigns)
- Bulgaria (indirect advertising allowed after 22.00)
- Germany
- Finland (absolute ban on alcohol advertising between 7.00 and 21.00)
- Ireland (absolute ban on alcohol advertising during/along children's program)
- Italy (during/along children's program)
- Latvia
- Romania (between 6.00 and 22.00)

- Slovenia
- Spain (absolute ban on alcohol advertising between 6.00 and 20.30)

\*PRACTICE OF EU COUNTRIES, see more:

[https://www.dlapiper.com/~media/Files/Insights/Publications/2016/12/3169756\\_UNICEF\\_Advertising\\_To\\_Children\\_Update\\_V8.pdf](https://www.dlapiper.com/~media/Files/Insights/Publications/2016/12/3169756_UNICEF_Advertising_To_Children_Update_V8.pdf)

→ A few challenges for the future – which is already here:

1. MEDIA/ADVERTISING LITERACY – the role of the regulator in developing media literacy of both parents and children (web portal, workshops within the school curriculum, participation in awareness-raising campaigns, promotion of complaint tools etc.)
2. MEDIA EDUCATION – as a priority, classification of a compulsory school subject; curriculum needs to follow the development of advertising techniques and the level of exposure to advertising in individual age groups
3. (PROMOTION OF) HEALTHY EATING HABITS – the role educational system and media
4. While excessively regulating exclusively traditional media we forget, that children are more and more addressed by other deregulated internet platforms-new advertising forms whose broadcasting is unlimited in both scope and time.
5. Too strict requirements in the field of traditional media can lead to movement of advertisers to other, less regulated platforms.
6. Providers of AV media can create a better quality program (also) with the help of advertising resources.
7. Regulation of advertising to children in children program does not take into account program content with high proportion of children among the audience (e.g. family films)
8. Continuous and coordinated cooperation with clearly defined goals between the two holders of regulatory powers NIJZ and AKOS and other stakeholders.

## 10 Conclusions and recommendations

### Setting the scene

Preventing and controlling NCDs, as well as risk factors of NCDs, is one of the major development imperative for the 21st century (WHO, 2017). Since exposure to risk factors begins in childhood, protecting children from adverse impacts of marketing, including DM, is important for reducing risk factors for NCDs (WHO, 2013). Digital technologies, which are widely used by children across Europe, offer rapidly evolving practices of marketing and advertising, including personal data collection and emotional persuasion, to achieve greater advertisement attention, more positive brand attitudes, and higher product sales in comparison to traditional marketing platforms (e.g. broadcasting) (WHO, 2016).

Current knowledge and public health approaches are not adequate for controlling (prevention, monitoring, counteracting) DM, therefore the NIJZ decided to launch a Digital marketing initiative. Capacity building workshop 2017 on Digital marketing to children - methodological challenges in linking public health siloses was organized by the NIJZ, and the WHO Country Office for Slovenia.

The aim of this workshop was to define how to proceed in the area of digital and other types of marketing of different lifestyle risk factors to children with the following objectives:

- to raise awareness and to build capacity for Slovene health promotion workforce in the area of DM;
- to define common denominators for more efficient work in the area of DM of “lifestyle products” to children and adolescent in Slovenia;
- to develop background materials and recommendations for the work in the area of DM to children in the future;
- to contribute to the work of WHO in compiling evidence and best practices to tackle the growing problem of digital marketing to children.

Lectures on principles of DM, legislative issues and technological options, presentation of experience of the participating countries and possibilities for public health action were followed by round-table discussions on recommendations for further steps. Participants have voted for ideas they considered most important. Ideas most commonly voted for were collected under the following subsections: ethics, governance and leadership, framing and regulation, capacity building, research, and call on immediate actions. They are presented below.

## **1. Ethics**

General need for further elaboration of ethical issues of DM was stressed. Lack of transparency on individuals' information collection, analysis, selling, and ownership was pointed out as controversial, especially given the low level of awareness of persuasive techniques, inherent to DM, and the addictive nature of digital media. Social norms were recognized as the broader context of DM to children. Indeed, policy can support social norm changes by clearly stating their priorities, helping address even global problems (Nyborg et al, 2016). It was expressed that currently business interest (profit) is much stronger than public interest and that parents are more likely addicted to digital media as before, which could be among main inhibitory factors in the process of changing social norms related to DM to children. However, nongovernmental organizations (NGO) programmes focusing on personal development of children were identified as a key enabling factor. Putting focus on quality relationships, family life and common activities was recommended.

## **2. Governance and leadership**

Absence of specific dedicated working group addressing the problem of DM within institutional and political framework was recognized. Establishing an intersectoral body, responsible for framing DM, and putting the issue of DM into strategies and agendas of broad circle of institutions was recommended. Since DM is a global issue including various sectors, it was recommended to address it on the level of the UN. Public health was proposed to take over the leadership regarding the problematics of DM on national and international levels.

## **3. Framing and regulation**

Lack of recommendations and regulation in the area of DM to children was recognized. It was stressed that data collection, analysis, dissemination/selling and ownership should be transparent by the industry and that data extraction from minors should be limited/stopped. The need for clear regulation of media marketing was recommended, especially regarding updated definitions in digital media and appropriate extension of rules for broadcasting also to digital media.

## **4. Capacity building**

More resources for governance and capacity building are needed to act effectively in this relatively new and challenging area. In turn, organized civil society groups will be stimulated to gain and disseminate knowledge to the general public. It was pointed out, that general

public is unaware of subliminal messages, present in the content of DM, and their addictive nature. Raising public awareness and improvement of digital literacy of children, parents, teachers, etc. (possibly placed in the school curriculum), and empowerment of parents and future parents through education about possible harms due to DM to children was recommended.

## **5. Research**

Lack of knowledge on DM, its techniques, and impacts was recognized. Research results and knowledge dissemination to a broad range of experts and audiences is vital.

## **6. Call on immediate actions**

As a general recommendation, it was stressed, that even if we lack sufficient knowledge on the problematics of DM, we should immediately start taking action that follow from the above recommendations. Equally important is monitoring and evaluating these actions as ongoing.

## **7. Conclusions and recommendations of the workshop**

Immediate action is needed to frame DM to children, which would among others include:

- establishing an inter-sectoral body;
- providing more capacities and resources for public health actions in the area of digital marketing, together with increasing multidisciplinary competences;
- further elaboration ethical issues;
- ensuring transparency of personal data extraction, storage, sale, and ownership in the digital media, and limit emotionally persuasive and/or addictive techniques and/or targeted advertising of DM, especially for minors;
- developing clear regulation on digital marketing;
- raising public awareness and improving digital media literacy;
- stimulating research fully characterising the digital marketing children are exposed to and noting their differential susceptibility.

## 11 References

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A number of references are included in the presentations.