



## MEDIA POLICY BRIEF 23

# #SponsoredAds: Monitoring influencer marketing to young audiences

**Miriam Rahali and Sonia Livingstone, LSE**

The London School of Economics and Political Science  
Department of Media and Communications

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**Edited by: Emma Goodman, Emily Cousens and Ruhi Khan**

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## Key messages

- [97%](#) of British children (ages 5-15) used video-sharing platforms in 2020, with [58%](#) reporting that they spend 2.5 hours a day watching YouTube
- [95%](#) of YouTube videos aimed at children ages eight and younger contain advertisements
- Children are uniquely [vulnerable](#) to the persuasive effects of advertising because of immature critical thinking skills and impulse inhibition
- The [embedded](#) nature of influencer marketing is worthy of [critical attention](#) because the engaging social media posts lower children's ability and motivation to recognize it as 'advertising'
- Advertisers and influencers have a critical role to play in protecting children from online harm by ensuring that all [sponsored content](#) is clearly demarcated
- [Platforms](#) can minimize the volume of influencer advertising that is promoted to children
- [Educators](#) can provide media literacy training that incorporates content related to social media influencers
- [Parents](#) can take a more active role in monitoring their children's exposure to online advertising, and instill critical responses to online advertising in their children

# Summary

Changes in children’s media habits, namely their access to and participation in online activities, have warranted concern from parents and advocates. This brief locates children at the epicenter of an exploding digital media landscape, and considers the way their deep connection to technology has generated new non-traditional marketing opportunities. Brands are actively using the internet to reach young consumers, primarily via social media influencers, whose online presence tends to blur the boundaries between commercial and entertainment content.

Children are particularly susceptible to influencer marketing because their ability to effectively identify persuasive messages has not yet fully developed. As such, they are less likely to critically evaluate advertisements because sponsored brand posts by social media influencers can often appear trustworthy and honest. In this brief, we assess the strengths and weaknesses of existing regulation before reviewing the opportunities and challenges that influencer culture presents to young children. Recommendations are made to relevant stakeholders – such as parents, educators and policymakers – to help children better recognize influencer marketing and make well-informed, conscious consumption choices.

## Introduction

Historically, children have been a key target group for marketers on account of their influence on parents’ buying decisions, and their potential as future adult consumers. Marketing to children is deliberate, strategic and innovative – and because social media has become a ubiquitous presence in the daily lives of children and adolescents, brands are increasingly reaching children through digital platforms.

YouTube in particular has emerged as an alternative to traditional television content. Ofcom’s [media literacy research](#) found that YouTube was the most-used video-sharing platform (VSP) among children ages 5- 15 for watching content in 2020. Research conducted by CHILDWISE evidences YouTube’s sizeable presence in children’s daily lives, with [58%](#) of children aged 5-16 saying that they use YouTube every day, and spend, on average, almost *two and a half hours a day* doing so.

Children watch YouTube videos in which their favorite vloggers are playing games, unboxing toys, reviewing products or going through their daily routine, for example. The children featured in YouTube videos are highly sought after by businesses not only because the content appears child-led, but also for their ability to reach [other markets](#). For example, the most popular child-YouTube stars have their own channels, such as *Kids Diana Show* and *Like Nastya*, with 87.1 million and 85.4 million subscribers respectively.

Unsurprisingly, marketers are re-allocating their marketing funds to social media. [Research](#) has shown that:

- 95% of videos aimed at children aged eight and younger on YouTube contain advertisements

- Over one-third of videos in the early childhood category contained three or more advertisements, while 59% contained one to two advertisements
- Children are not only exposed to advertising before they watch a video, but also advertisements are increasingly embedded *within* the videos as well
- Research has found that almost half of the videos (45%) viewed by children 8 and under featured or promoted products for children to buy
- Of these videos, 22% were considered high in consumerism because they centered around toys, involved YouTubers promoting their own merchandise, or prominently featured branded products

Sponsored content frequently appears in YouTube videos but presents a problem when subtly integrated and not disclosed. Appearing in fun and engaging social media posts, the [embedded](#) nature of influencer marketing is worthy of [critical attention](#) as it is hard for children to recognize as ‘advertising’.

[Previous research](#) has shown how some videos promote a materialist lifestyle. This may influence children’s ideas about normalized play behaviors or ownership of material goods. Social media videos depicting the ‘unboxing’ of new toys have become a [lucrative revenue stream](#) in the digital economy, evolving in both [scale and commercial influence](#) over the past decade. This marketing tactic shows a child influencer – or ‘kidfluencer’ – unbox a new toy, play with it, and comment on the experience. For example, Ryan (of *Ryan’s World*) is today’s most popular and highly paid child influencer, with 30 million subscribers to his YouTube channel, and earnings of nearly [\\$30 million](#) (in 2020) for reviewing branded toys and products.

The numbers behind the most famous kidfluencers may suggest that British children are merely an audience to the phenomenon, but in fact there are many well-known British kidfluencers. Collectively the [top ten UK ‘kidfluencers’](#) have a combined subscriber count of 57,824,000, and have accumulated more than 19.18 billion video views.

Different than child actors, for example, kidfluencers do not ‘pretend’ to play and have fun with toys. [Qualitative interviews](#) with children ages 5-15 have revealed that kidfluencers have increased relatability to their audiences because the intent behind their actions is perceived as authentic. [Research](#) suggests that children and adolescents find influencers credible, and their messages are considered more trustworthy and honest than commercial advertisements.

Unsurprisingly, the [kidfluencer phenomenon](#) has warranted concern from parents and advocates around children’s access to and participation in social media. [The UK Parliament’s Digital, Culture, Media and Sport Committee](#) is currently conducting an inquiry to examine the power of influencers on social media and will consider the absence of regulation on the promotion of products and services. The following section briefly looks at the current advertising regulatory system in the UK, with specific reference to advertising to children.

# The current state of regulation regarding online advertising to children

*“It’s our job as the advertising regulator to make sure that we maintain a balanced approach, taking into account competing views but all the while making sure the rules are based on evidence” – [The Advertising Standards Authority](#)*

Children’s and teenagers’ unique developmental needs make them more susceptible to negative physical and mental [effects](#) of digital marketing. Children are uniquely [vulnerable](#) to the persuasive effects of advertising because of immature critical thinking skills and impulse inhibition, which may result in unhealthy behaviors, such as consuming foods that are high in fat, sugar and salt. Children and adolescents may be able to recognize advertising, but often are not able to be critical of the message when it is embedded within trusted social networks, encouraged by celebrity influencers, or delivered next to personalized content. Furthermore, they do not comprehend the [full complexity](#) of how digital data are collected, analyzed, and used for commercial purposes.

Currently, the [Advertising Standards Authority](#) (ASA) is the UK’s independent advertising regulator, ensuring that ads across UK media do not deviate from the advertising rules that are written by the Committees of Advertising Practice (CAP). In 2016, CAP looked at the evidence behind how children recognise online ads, finding that most of the time even young children have a grasp of the signifiers that identify ads. Understanding that there is a commercial intent behind a communication allows children to assess the messages critically and respond appropriately, and [guidance](#) requires advertisers to take steps to disclose the commercial intent of a communication if it is not clear from the form of the advertisement or its wider context.

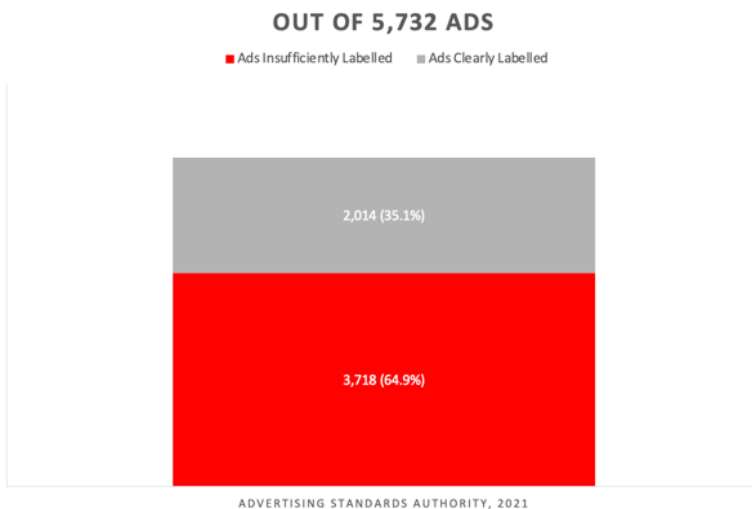
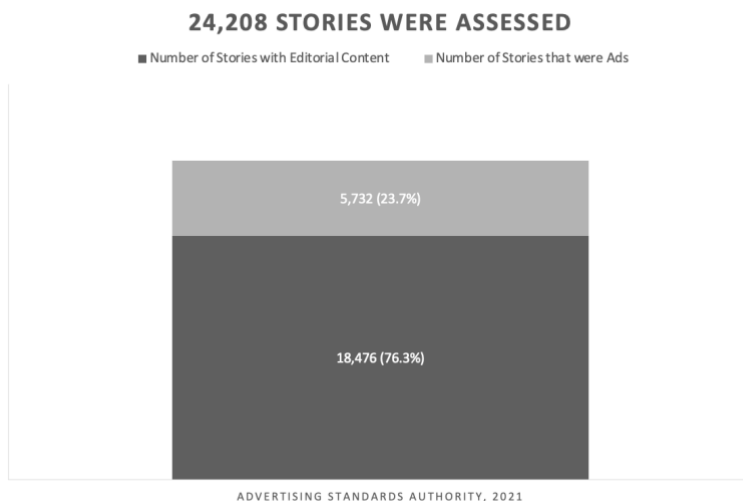
Examples of where the advertising disclosure is applied include:

- endorsements by vloggers or bloggers or other online ‘influencers’ where the endorsement is paid for and controlled by the advertiser
- video content on third-party sites where the video has the effect of promoting products or a brand
- marketing communications appearing in virtual online worlds and other games
- advertising that is not clearly separated from the surrounding content
- advertiser-created games appearing on third-party websites

There are some instances in which the ASA will consider that user-generated content (UGC), such as social media posts, tweets, photos, reviews and blogs/vlogs created by *private* individuals, is subject to the CAP Code. Most commonly this will occur when content is “[adopted and incorporated](#)” into a marketer’s own marketing communications: for example, if the marketer requests content from users and then places that content on their social media channel.

Social media platforms also play an integral role in helping the authorities secure standards by removing non-compliant ads. For example, creators of kids’ YouTube content have now been forced to mark their content as ‘[Made-for-kids](#)’ or risk facing a fine per video. The [Competition and Markets Authority](#) requires discounted PR gifts and freebies to be disclosed (since this is an incentive or type of payment). Furthermore, when vloggers feature their own products they are also required to inform their viewers.

However, despite guidelines from platforms and governmental regulators for mandatory disclosures of these endorsements, influencers often do not appropriately disclose the commercial nature. Even though the UK government and the ASA have warned influencers that they should appropriately ‘signal’ when they are paid to promote products in their videos, the ASA assessed 24,208 stories on social media and [found](#) that 24% contained ads, and only 35% of those ads were labelled correctly.



Influencers may not appropriately disclose that their post is an ad because the definition of ‘advertising’ is debatable. Furthermore, there is a lack of consistency across the board (both nationally and internationally). Media originating from countries outside the UK and the EU ([which prohibits brand placement in children’s programmes](#)) may have less regulation concerning sponsorship identification, which is a cause for concern when their sponsored videos are viewed transnationally. The US has implemented stricter privacy regulations for platforms, after Google and YouTube agreed to pay \$170 million in 2019 in a [national settlement](#) for violating the Children’s Online Privacy Protection Act (COPPA). However, when the target audience is children, there is a question of whether a five-year-old child would even understand what #ad or #contest means in the context of the post or the YouTube video.



YouTube channels serve ads based on user-location as opposed to the location of the channel, so many of the ads served to YouTube users in the UK fall under the [ASA's remit](#). YouTube recently submitted [evidence](#) to the DCMS parliamentary committee's open Influencer Inquiry, maintaining that the platform has clear policies surrounding paid promotions and endorsements. This is to ensure that creators and brands are aware that they may have to comply with *local* legal obligations. Platforms that lead children (who are unable to gauge intent) towards certain commercial or profitable messages are harms that the policymakers can regulate against. Regulation should occur when the risk of being online turns to harm, which will be the focus of the following section.

## Key challenges

*"The combination of commodification and intimacy can make it difficult for children to realize that the person on-screen is not their 'friend', and the video is not a playdate."*  
[Berryman & Kavka](#)

### i. Advertising literacy

Researchers in [advertising literacy](#) attest that unless children are able to differentiate between advertising and other forms of entertainment, and grasp the persuasive intent of advertising, then they are at risk of deception. This is especially true for children under 12, whose advertising literacy – all knowledge and skills related to understanding advertising – has not yet fully developed. Cognitive abilities, emotion regulation and moral development are still immature for children under 12. These abilities are critical in helping them to:

- understand the persuasive intent of advertising and strategies used to persuade them
- control the emotions that advertisements may arouse
- evaluate the fairness and appropriateness of advertising

On the whole, children begin to [develop the ability](#) to recognise marketing at a very young age and have reasonably well-developed levels of critical understanding from the age of 8 years. By the age of 12, children approach adult levels of critical understanding. However, younger children still struggle with significantly integrated and highly immersive marketing in online environments. As previously discussed, online platforms provide opportunities for editorial and marketing content to converge in ways and to degrees that are often not possible in traditional media. Importantly, such communications may lack more traditional signifiers of commercial intent, such as clear separation from the surrounding editorial content, which younger children rely on to trigger their critical understanding. In comparison to television advertising, the task of identifying and recognizing the persuasive intent of online advertising is more difficult. As such, the same age boundaries (8-12) may not apply to critical understanding of embedded content.

[Previous research](#) has investigated children's advertising literacy by exploring their knowledge and judgements (and reasoning strategies) of new advertising formats, such as digital advertising. In particular, insight is provided into children's critical reflection on the tactics of brand integration (or embedded advertising). Findings show that:



- Despite their basic understanding of the selling intent of advertising in general, kids did not actively look out for advertising that is embedded in entertaining and/or interactive media content
- The children seemed easily overwhelmed by the fun and immersive character of the new advertising formats which usually resulted in a positive evaluation of these formats and indifference towards the used tactics

## ii. Parasocial relationships

Further cause for concern is the parasocial relationship that can develop between the kidfluencer and the child viewer. [Parasocial interaction](#) is the thought, emotion and action that a child experiences during media exposure to a kidfluencer. Up to half of the children surveyed in [Ofcom's Media Use and Attitudes Report](#) said they watched vloggers or YouTube influencers; this was more likely among 8-11s (47%) and 12-15s (49%) than among younger children ages 5-7 (34%).

Because of repeated exposure, these interactions can develop into a parasocial relationship, which is a one-sided symbolic relationship between the child viewer and the kidfluencer, in which the child feels that they have a genuine empathetic relationship with an on-screen or online character, whether that character is real or otherwise. The child viewer may feel that the character is speaking directly to them, or that they understand the child and their needs and interests.

This intimacy is especially concerning when combined with commodification. If children feel as if they know an influencer on a personal level, and are trusting of their content, exposure to these cues could give children the impression that these items are important to an influencer which could impact their own relationship with toys, games, food and beverages, etc. In some cases, [research](#) has shown how influencer-aspirant toys, such as the Nancy YouTuber doll, not only normalize social media promotional practices, but also deepen the commodification of childhood. The following section will consider some of the advantages and disadvantages of social media marketing and influencer culture on children's health.

## In focus: Online advertising and childhood obesity

Despite the increasing prevalence and importance of influencers in children's commercial media environment, research on how influencer marketing affects young children is still limited. Typically, much of the previous scholarship and debate in this area has centered on the impact of advertising for foods that are high in fat, sugar and salt (HFSS) on levels of childhood obesity.

There have been longstanding concerns about the potentially harmful effects of food promotion on children, which have only been exacerbated as the food and beverage industries have begun shifting their spend from TV to digital media in order to reach young

people. One recent [UK study](#) explored the extent and nature of food and beverage cues featured in YouTube videos of influencers popular with children, and the data provide the first empirical assessment of these cues.

While it is well established that marketing unhealthy food is highly prevalent and has a detrimental effect on children’s eating behaviours and diet, more recent research highlights how the kidfluencer is contributing to this phenomenon. Research has been done to examine kidfluencers and unhealthy food product placement with an aim to identifying the frequency with which kid influencers promote branded and unbranded food and drinks during their YouTube videos. Analysis of the most-watched kidfluencers (ages 3–14) on YouTube found that they generate millions of [impressions](#) for unhealthy food and drink brands through product placement. High exposure to unhealthy food advertising has been [shown](#) to increase immediate intake of these products.

Current self-regulatory rules in the UK prohibit HFSS food and beverage marketing in digital media targeted at children, or where children make up more than 25% of the audience. This indicates that the rules in place are not only strict, but also prohibit ads that encourage poor nutritional habits or an unhealthy lifestyle in children. However, while there is robust [evidence](#) that links children’s exposure to marketing of food and beverages high in fat, sugar and salt with increasing levels of obesity, it should be noted with caution. Advertising is only one factor influencing children. Most experts agree that advertising does have some impact, but the evidence suggests that the [impact](#) is very small.

### Possible Benefits

One of the upsides to digital marketing is that YouTubers are among the many sources of health information young people encounter in the digital age, and they are increasingly recognized by popular media and public health organizations as a potentially influential source of health information. UK health campaigns are beginning to make use of YouTubers in health improvement, and [research](#) has shown that YouTubers can help address certain health issues, such as obesity.

Children [report](#) enjoying being part of a “follower” community on YouTube, and view influencers as both role models and friends who provide support and advice. It is therefore plausible that they are positively affected by influencers that regularly feature, for example, healthy food and beverages in their YouTube videos – especially those who have watched these videos for a long period of time. Given the variety of content now available to children through video sharing platforms, policymakers and researchers may want to explore the impact on children of content promoting other health-related (e.g., physical activity) or pro-social (e.g., cooperation) behaviors.

## Recommendations

The [Kidfluencer phenomenon](#) has warranted concern from parents and advocates around children’s access to and participation in social media. However, a sustainable, long-term solution requires buy-in from multiple stakeholders:

<b>Advertisers</b>	<b>Visibly disclose sponsored advertisements</b>
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<b>&amp; Influencers</b>	<p>While the approach to influencer advertising may vary across platforms, it seems reasonable to expect that ads should be clearly demarcated so that the child is able to identify commercial intent. The use of “#ad” has been the most prominent way of communicating this message. In the UK, disclosures can be included in the description, but perhaps efforts can be made to mandate a verbal disclosure, as young children are often not yet able to read.</p>
<b>Platforms</b>	<p><b>Minimize the volume of influencer advertising that is promoted to children</b>  This would go a long way towards reducing the number of problematic messages and exposure to products linked to the negative effects of advertising.</p> <p><b>Devise tools that can effectively quantify the extent and nature of digital marketing, including techniques such as product placement in user-generated social media content</b>  This will facilitate a better understanding of children’s likely exposure, and the persuasive ability of that exposure, which is critical for the development of effective policy in this area.</p> <p><b>Transparency behind algorithms is recommended</b>  Companies use sophisticated algorithms to target children with advertising on social media, with limited regulation. Currently the content landscape is dictated by profit and brand or platform decisions, and it is not in the interests of children. The personalised-advertising, algorithm-driven, maximised-engagement business model has played a large role in creating and sustaining a <i>commercial</i> online environment.</p>
<b>Polymakers</b>	<p><b>Strengthen regulations regarding product placement on platforms with a child audience</b>  However, enforcing a ban – or a limitation on ads/sponsored content – without explanation is problematic, and doesn’t fully do the job that society needs it to do. It acts as a shield without providing the tools to be able to deconstruct or be critical of the messages. This is likely to be beneficial in the short-term; but in the long run, stakeholders should be focusing on building children’s critical digital literacy skills.</p>
<b>Parents &amp; Educators</b>	<p><b>Monitor their children’s internet use and reduce their contact to advertising through screening, discussions, and filtering</b></p> <p><b>Advertising Literacy by Design</b>  Educators can provide advertising literacy training that incorporates content such as games and informational vlogs into the curriculum for assignments related to digital platforms.</p> <p><b>Strengthen skills to recognize new and embedded advertising formats</b>  Parents and educators are viewed as having a responsibility to deter children from invasive marketing, but it is unclear whether they have the knowledge necessary to undertake this role. For adults to be digitally literate, they must be able to differentiate between advertising and other forms of entertainment, and comprehend the persuasive intent of advertising.</p>
<b>Children</b>	<p><b>Further develop advertising literacy*</b>  Interventions can include informational vlogs and the implementation of a visual disclosure, which helps children recognize influencer marketing practices as advertising, without necessarily negatively impacting the influencer and advertising effectiveness.</p> <p>* This should be noted with caution, as there is surprisingly little evidence to support the notion that if media literacy is high, or if it is increased, advertising effects are reduced. Advertising is only one factor influencing children.</p>

## Conclusion

The rise of non-traditional advertising, such as influencer culture, combined with society's responsibility for protecting children from invasive marketing, makes this research timely and important. In today's digital world, where both children and adults struggle to distinguish persuasive techniques from other content, stakeholders need to be at the forefront of efforts to protect children.

Although parents play a large role in helping their children to be critical of media messages, identify advertising approaches, and resist their influence, it is also crucial that some of the aforementioned policy measures are in place in children's digital media environments to secure their interests. When that is not possible, academics, educators, parents (and children) may reconsider focusing on the avoidance of advertising through restriction and regulation by working together in developing, implementing and evaluating educational interventions and awareness campaigns that acknowledge children's abilities for critical reflection on kidfluencing and its tactics. In this way, society will better enable kids to recognize influencer marketing and make well-informed, conscious consumption choices both now, as well as in the future.

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# MEDIA@LSE

## **ABOUT:**

Media@LSE aims to encourage informed and insightful discussion around the vital role of media and communications in contemporary society, bringing the research and expertise of LSE's Department of Media and Communications to a wider audience that includes fellow academics, civil society, policy makers, journalists, the broader media industry, and other stakeholders.

Through the Media@LSE blog and annual research theme, the Department seeks to contribute to a better-informed public debate. We aim to facilitate the exchange of knowledge and understanding between experts within and outside academia, and to promote contemporary academic research into media and communications in order to increase its perception and impact. We also seek to achieve a better understanding of how changes in media and communications shape, and are shaped by, social, cultural, political, economic and historical developments.

## **MEDIA@LSE BLOG:**

<https://blogs.lse.ac.uk/medialse/>

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