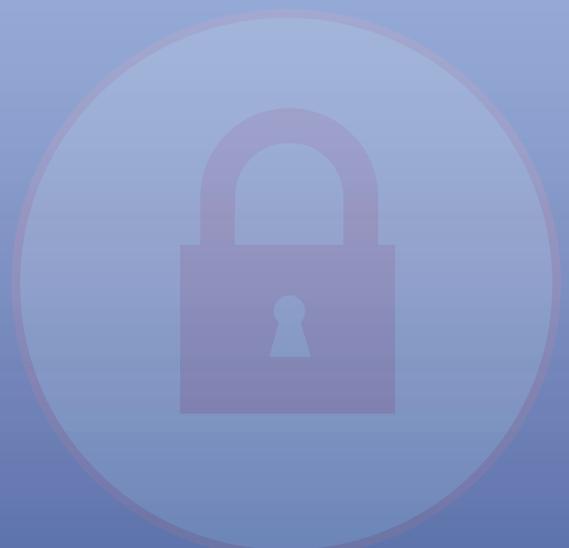




Five Reasons

Why Facebook is Not Suitable for Children **Under 13**



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FIVE REASONS WHY FACEBOOK IS NOT SUITABLE FOR CHILDREN UNDER 13

A survey in 2011 by [Consumer Reports](#) found that more than 5 million children were on Facebook. Though the company's official [policy](#) does not allow children under 13 to set up profiles, according to a report in the [Wall Street Journal](#), Facebook may be planning to open its service to them. Child advocacy, health, and consumer groups have raised serious [objections](#) to these plans. Many people are concerned about children's risky behaviors if allowed on the site, as well as possible exposure to harmful content, bullying and predators. In addition to these are serious issues, Facebook has a business model that makes it particularly problematic for children. As the popular social networking platform has grown -- amassing more than one billion users worldwide -- it has developed a growing set of marketing and data collection practices that, by their very nature, exploit young peoples' well-documented developmental vulnerabilities.

Below are five reasons why Facebook is not suitable for children under 13:

1. Children would become part of one of the Internet's most expansive personal data collection and profiling platforms.

Data collection, data analysis, profiling, tracking, and monitoring of social interactions are intrinsic operating features of Facebook. While many people are aware of how users voluntarily provide personal profile information, status updates, "likes," etc., they may not realize that much of the data collection on Facebook takes place without direct user involvement or control. Through its partnerships with [data broker companies](#) such as Datalogix, Acxiom, and Epsilon, Facebook enables advertisers to engage in precise targeted marketing based on detailed information about its users.¹ This can include not only what they say and do on Facebook, but also their movements and behaviors across the web and offline.² Most people are focused on their social experiences on Facebook and do not understand how Facebook's business relationships are designed to use their digital profiles and personal relationships for commercial surveillance and marketing purposes.



2. Children would be exposed to a new generation of highly persuasive and manipulative digital marketing practices.

While on the surface Facebook presents itself as a place where people can develop and maintain their social relationships, it is also a commercial and heavily branded space. Facebook has recently hit the milestone number of [1 million advertisers](#) actively using the platform to market to its growing user base.³ It offers companies a variety of sophisticated marketing techniques for taking full advantage of the platform to reach and influence users. The most innovative campaigns are highlighted on its [Facebook Studio](#).

Many of the techniques used by marketers on Facebook are part of a broader set of evolving practices in the digital marketplace. However, Facebook holds a particularly prominent and influential position as the leader in social media marketing, developing an expanding arsenal of innovative advertising "tools," and offering brands a variety of

ways to interact with its users. Facebook’s platform is designed to support a continuous marketing process through brand-related “experiences” in games, multi-media, and mobile apps. The following is a snapshot of some of Facebook’s marketing and advertising techniques that raise concerns for children:

- Tapping into users’ online social relationships to orchestrate peer-to-peer brand promotion among friends and acquaintances; this includes targeting key “influencers” and enlisting them to become “brand ambassadors.”
- Blurring the lines between marketing and content by enabling marketers to insert their branding messages into the “News Feeds” that appear on individual profiles.
- Offering prizes, sweepstakes, and other incentives to “activate” users to engage in behaviors that support marketer goals – such as “liking” a product, joining a branded community, or sharing a promotional message with others.
- Tracking and measuring user responses to marketing messages in real time in order to perfect the persuasive techniques.

3. Facebook’s marketing practices would take advantage of children’s cognitive, social, and emotional vulnerabilities.

Children are still developing – psychologically, biologically, and socially. We know from decades of research that



they are vulnerable to a range of advertising and marketing practices. The younger ones cannot always tell the difference between fantasy and reality, or recognize advertising. For example, children under 8 have difficulty understanding persuasive intent, making it hard for them to realize that advertising and marketing techniques are tools marketers use to persuade them to buy something as opposed to simply delivering factual information. Even older children can be confused, especially by digital marketing techniques that are disguised as entertainment, embedded in an online game, or presented to them through a friend.⁴ For preteens (8-12) the research shows that they are in a unique

stage in their development when their peer relationships are beginning to have a profound influence on their choices and preferences. They are inclined to behave impulsively and often do not think about the consequences of their actions before taking them. As they begin to explore their identities, they are particularly drawn to social media, posting photos and other personal information about themselves, and not always using good judgment about what they share.⁵

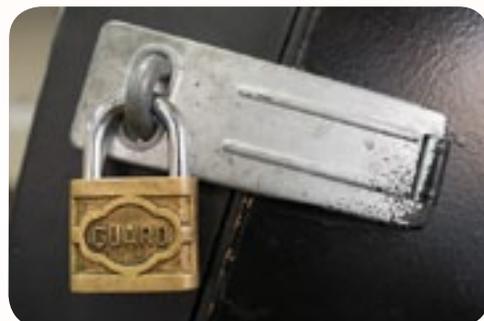
Children under 13 are impressionable and vulnerable to the influence of social media marketing, and are less equipped than adults to make distinctions among all the myriad, sophisticated, subtle, and largely invisible ways in which marketing engages users on Facebook.

4. Children would be subjected to an onslaught of unhealthy food marketing—precisely at a time when childhood obesity has become a major crisis.

Childhood obesity has more than doubled in children and tripled in adolescents in the past 30 years, with more than one-third of young people either overweight or obese. These trends have sparked an alarming rise in serious diseases, including Type 2 diabetes.⁶ Marketing of unhealthy food and beverage products – fast food, snacks, sugar-sweetened beverages – is a major contributor to this public health problem.⁷ Food and beverage marketers have moved aggressively into social media. Being on Facebook gives these companies unprecedented access to young consumers, where brands can create new “fans” and promote sharing of viral content. Among the top brands on Facebook are: Coca-Cola (70+ million fans), Oreo (34+ million fans), McDonald’s (29+ million fans), and Skittles (25+ million fans).⁸ This marketing raises serious health threats for children and youth.

5. There are no safeguards in place that can adequately protect children from Facebook’s aggressive and harmful marketing and data collection practices.

Neither Facebook’s own privacy settings nor the recently updated Federal Trade Commission (FTC) rules to the Children’s Online Privacy Protection Act (COPPA) offer sufficient protection from the range of manipulative and harmful marketing practices described above. Facebook’s privacy settings are designed primarily to allow its users to choose the people with whom they want to share information.⁹ It is very difficult, and practically impossible, for users to “opt out” of targeted marketing.¹⁰ Most adult Facebook users would find the procedures difficult to navigate; children are even less equipped to manage them.



The FTC’s [newly revised COPPA rules](#) now cover many new practices in the children’s digital marketplace, giving parents additional tools for protecting their children from online data collection on mobile phones, Internet-enabled games, and other digital devices. However, the rules cannot address all of the concerns that Facebook raises for children. Its rapidly expanding marketing and data collection enterprise is so extensive, complex, and opaque, that parents cannot be expected to understand the full range of its techniques, nor how its business operations take advantage of children’s vulnerabilities.

While Facebook’s popularity and visibility may make it enticing to children, there are multiple reasons why it is not an appropriate platform for them. These include not only the critical concerns about their online safety, cyber bullying, and harmful content, but also major threats to their privacy, health, and well being. Simply obtaining parental permission for children to set up a Facebook profile would not address these problems. In the absence of systemic changes to Facebook’s digital marketing and data collection operations, it would be highly irresponsible for the company to open its network to young people under 13.

Notes

- ¹ As Facebook explains to its advertisers: “Custom audiences let marketers find their offline audiences among Facebook users. Using email addresses, phone numbers, Facebook user IDs or app user ID’s to make the match, you can now find the exact people you want to talk to, in custom audiences that are defined by what you already know.” Facebook Audiences. (2013). Facebook.com. Retrieved on July 28, 2013 from <https://www.facebook.com/help/459892990722543/>
- ² Loomer J. (2013, April 29). How to Target Facebook Ads Based on Purchase History, Lifestyles and More. Retrieved on July 28, 2013 from <http://www.socialmediaexaminer.com/facebook-partner-categories/>
- ³ Hoff R. (2013, June 18). You Know What’s Cool? 1 Million Advertisers On Facebook. Forbes. Retrieved on July 28, 2013 from <http://www.forbes.com/sites/roberthof/2013/06/18/you-know-whats-cool-1-million-advertisers-on-facebook/>
- ⁴ D. Kunkel and J. Castonguay, “Children and Advertising: Content, Comprehension, and Consequences, ” in D. Singer and J. Singer (eds.), Handbook of Children and the Media, pp. 395-41 (Thousand Oaks, CA: Sage, 2012); D. R. John, “Consumer Socialization of Children: A Retrospective Look at Twenty-Five Years of Research,” Journal of Consumer Research 26, (1999): 183-213.
- ⁵ C. Pechmann, L. Levine, S. Loughlin, et al, “Impulsive and Self-conscious: Adolescents’ Vulnerability to Advertising and Promotion,” Journal of Public Policy & Marketing 24, n. 2 (2005): 202-221.
- ⁶ Center for Disease Control and Prevention. (2013) Childhood Obesity Facts Retrieved on July 28, 2013 from <http://www.cdc.gov/healthyyouth/obesity/facts.htm>
- ⁷ Institute of Medicine. (2005). Food Marketing to Children and Youth: Threat or Opportunity. Retrieved from <http://www.iom.edu/Reports/2005/Food-Marketing-to-Children-and-Youth-Threat-or-Opportunity.aspx>
- ⁸ Top Products on Facebook. (2013). Fanpagelist.com. Retrieved on July 28, 2013 from <http://fanpagelist.com/category/products/>
- ⁹ Facebook Basic Privacy Settings and Tools. (2013). Facebook.com. Retrieved on July 28, 2013, from <http://www.facebook.com/help/325807937506242>
- ¹⁰ For example, Facebook currently works with at least 15 third party data providers –including AdRoll, AppNexus and Xaxis—to deliver targeted ads. There is no simple way for users to opt out of the arrangement, other than going to each provider’s page with a request. Facebook 3rd Party Service Providers. (2013). Facebook.com. Retrieved on July 23, 2013 from <https://www.facebook.com/help/www/133547810119620?rdhc>