

# An **Ethical Framework** for marketing and monetizing digital content media for a 'self-published' **children's / youth audience**

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A research study supported by

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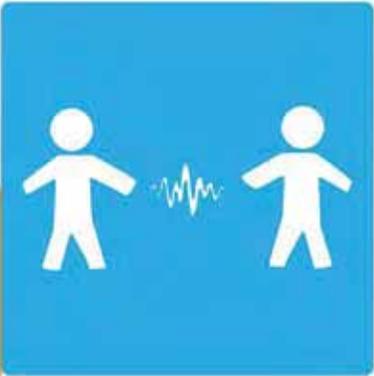
**kidsmediacentre**  
**An Ethical Framework for Content Creators in the Children’s  
Digital Space**

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Note from Authors: This document uses APA style citations and references per academic standards and requirements at Centennial College. A full list of references is available on page 157.



## EXECUTIVE SUMMARY

The children's digital media stream in Ontario is a hotbed of innovation and many new content creators have emerged in the last few years eager to explore the fertile ground of this category. Fueled by a host of child and family-friendly mobile technologies, the opportunity to tap into new markets is enticing, particularly as the media trumpets global success stories like Angry Birds, Club Penguin and Candy Crush Saga. Like their forerunners, digital media products face the same awareness and discoverability challenges as traditional media, as companies vie to capture children's attention and sell them on the unique play value of their brand. Whether it's children's cereal, a new toy or the latest and greatest app, the marketing and monetization challenges in the children's market involve roughly the same discipline and strategic challenges.

What's different in the digital space, however, is the privacy risks, the extent to which children are navigating this terrain on their own and the limited digital-and life-literacy children and youth often have when it comes to understanding the far-reaching consequences of their clicks, swipes and downloads. While ultimately it's the responsibility of parents and caregivers to supervise their children's digital and real world behaviour, it's also the shared responsibility of industry developers to create safe play and learning environments for children. As one grade 6 child we met in research so eloquently put it: "We're children. They're adults. Isn't it their job to keep us safe?"

With those words the gauntlet was thrown down. As important as safety is, the digital publishing industry as a whole serves to benefit if children's digital experiences address *all* the needs of the child. That means creating age-appropriate, entertaining, developmentally optimized experiences that allow children to play, learn, and flourish; experiences that acknowledge their strengths and limitations and build on the potential of every child. It also means acknowledging children's needs *as children*, not just consumers.

With this document we hope to give developers a review framework or a starting point against which to develop and/or assess their digital marketing and monetization practices. That means asking some tough questions. Questions like:

How well does your digital brand meet the needs of children and their parents? If your company performed a **child-first** brand assessment how would your brand fare? Is your children's brand in compliance with legal and regulatory standards? Does your app or website have a privacy policy that's child and family-friendly or is it pure legalese? What are your company's best practices as you design game and interactive media content for children? Would you want your own child to play or interact with your digital experience? How high-ground are your marketing and monetization practices?

When we asked these questions we learned some companies live and breathe transparency and ethics in all their marketing practices. Other companies refused to speak to us. Still others - new to the children's category – honestly admitted to little understanding of children's developmental needs and the regulatory requirements associated with children's digital privacy and safety.

## Key Findings

*Child-first design* was the North Star that helped guide us through this best practices review. The good work and good practices of most Ontario developers helped shape the resulting ethical framework tool called the PIX INDEX. Essentially, what constitutes a *positive interactive experience* for children? In our case study and developer interviews, the same five principal areas of a positive interactive experience emerged and, within each, a spectrum of considerations: **parent engagement/ communication, privacy design, user experience (UX), marketing and monetization**. We see this tool, not as a rating system, but as a continuum of options for developers to assess their business practices and the perceived value of their brand.

For those new to the category or requiring a refresher, the Key Findings section provides a review of legal considerations governing children's digital development in this country. Alongside PIPEDA, the Canadian Government's Privacy Act, we've added the U.S. Federal Trade Commission's (FTC) regulatory Rule for the Children's Online Privacy Protection Act (COPPA) - and the revised COPPA Rule - which governs all digital development by children's website operators and online services in the U.S. and internationally. The amended COPPA Rule goes into effect July 1, 2013 and is mandated for any developer whose products are available to U.S. citizens. The Act has been updated to reflect the new children's digital marketplace and place limitations on the social media tools, tracking/ad serving mechanisms and data analytics used by many of today's online services. Ultimately, the goal of COPPA is to place parents in control over what information is collected from their children online and ensure verifiable parental consent (VPC) in all marketing to children that involves the collection, use and disclosure of a child's personal information (i.e. email, IP addresses).

Additionally, an overview of child development and children's cognitive, social/emotional and creative needs is included for those content creators interested in connecting their brand experience to children's developing needs. Other considerations in game design, game mechanics and user experience allow developers to reflect on the suitability of their product to children of varying ages and stages including an evaluation of your brand's potential emotional connection with children.

Finally, a list of nine best practices reinforces the *child first ethos* that our research team identified as the guiding light in this exercise. Within each of these best practice

considerations is a comprehensive discussion of the issues and recommendations to enhance your digital content.

These include:

**Communicate your Brand Values.**

- A “brand promise” or “mission statement” is your company’s good faith promise and values on display. Yet very few children’s content producers have a brand vision statement as part of their brand communication. Parents and children want to know that you have a belief system and a moral compass, a dream or a vision for your brand. Over time, if you live and breathe this best practice, your consumers will come to appreciate you as a brand with integrity - an important asset in the children’s market.

**Audience Transparency: Who are you really targeting?**

- Though you may have set out to make an app for your twenty-something friends to play, if there is “actual knowledge” or even a “reasonable expectation” children are part of your audience – and you collect, use or disclose PII - you must abide by the legal guidelines that govern their privacy and personal information. That means ensuring you follow PIPEDA and the U.S. based legal rule COPPA which requires verifiable parental consent for children under the age of 13 who are engaging with your website or online service. In the European Union, children’s privacy protection is more than a statutory right; it’s a human right.

**Is your User Experience age appropriate? What life and literacy benefits does your experience provide for children?**

- Not every website or app needs to be educational. But consider that children *learn through play*, and everything they do ultimately teaches them something. We’re not suggesting all kids’ digital experiences incorporate hard curriculum but if your “driving” game requires obeying traffic lights or reading and understanding community signs, you’re delivering a deeper understanding of their environment. A child’s job is to learn how to learn. Even games with “soft skills”- friendship, perseverance, and good citizenship – provide important role modeling and life literacy for children.

**Are you acknowledging the ultimate gatekeeper: the parent?**

- We were surprised at the number of missed opportunities here. Very few developers were having a meaningful conversation with parents and those that were, often chose to speak with them in legal jargon in 10-point type accessed through a random link. Whatever the child’s age, providing privacy, safety reassurance and parental mediation features is important to involved, digitally savvy parents. Parental monitoring tools like a dashboard or parent account is an important best practice and a key competitive advantage for a company.

**Offer a kid-friendly, easy to read, easy to find, privacy policy for children. Of concern: many apps don't offer privacy policies at all.**

- Though a privacy policy is a legal document, it doesn't have to read like one. Many privacy policies our team looked at are legal mumble jumble, and kids likely don't have a clue about their importance or what they mean. They recognize early on that this information exists to protect the developer, not them. Children want to be smart and literate about the sites they visit. As digital natives, children and youth deserve language they can understand so they can play an active role in safeguarding their own personal information.

**Post your brand's Digital Citizenship expectations.**

- Just like you have to prove you know your manners at the kids' table before you can sit at the big table, kids need to learn how to be responsible online users right from the get-go. Digital citizenship expectations should be mandatory. Provide clear behavioural "rights and responsibilities"/"expectations and consequences" while they're still at the Webkinz age. Children are citizens of the Internet; they are being raised and socialized on your product and in your digital space. Your forums will provide role modeling. Start early.

**Be transparent in your Monetization disclosure. You have a right to make money, but you need to approach revenue generation ethically.**

- As an ethical developer, we recommend you explain your marketing and monetization model to parents and children in a clear, straightforward manner. Involve parents in the revenue tradeoff decisions you've made. BE TRANSPARENT. Parents are far more likely to want to pay for a game if you're honest rather than slipping walls of ads, inappropriate videos or in-app purchases (IAP) into a children's game. Developmentally, children are driven to succeed and may not weigh the risk associated with clicks and ad views.

**Use Social Media responsibly. Connect with parents; forego children under 13 years of age.**

- The "I didn't intend this for children, ergo I'm not responsible and it's up to parents to police it" attitude shows a dangerous level of indifference to child safety. Significant bodies of research indicate children don't have the developmental capacity to understand the full spectrum of risks associated with having a public persona.

A developer cannot use the excuse that it is up to parents to monitor their children's digital time – especially when they push to social media sites in their digital spaces. It's easy to pass off responsibility while benefitting from social media but this does not serve your product in the long run, and tarnishes your brand image. We want kids to

have access to great content and you can build in child-friendly community tools. Just make sure you secure verifiable parent consent. But if you want that Facebook or Twitter link on your page? Put it in your new “parent” section.

**Consider the real-world application of your property.**

- Maximize the ROI potential of your product or service by equating it with broader opportunities in the community. How can a product benefit a child in terms of connecting them to a positive community, teaching them basic skills or building their creative mind? Explore ways in which your property connects to curriculum, school activities, Boys and Girl’s Clubs, Girl Guides, Scouts and tell parents and kids about it. Connecting gaming and interactive play to opportunities (ecology, health) and challenges (sedentary behaviour, resources) in the real world is a win for children and a win for the industry.

These nine best practices and the *PIX Index* ideally serve the needs of children *and* publishers of digital media. It became increasingly apparent to us through case studies and developer interviews that transparency, accountability and child-friendly design is ultimately good business. We hope they represent a fusion of activist ethics with marketing pragmatism and that they serve as a useful resource for the children’s content industry in Ontario.

The greatest concern around “ethical” reviews is that they stymie innovation. Simply put, if you fiddle with “the creative formula” you risk turning back the clock or “breaking” the Internet. The weight of this concern was real but so was our concern with doing right *by* children. As Voltaire, and the creator of Marvel Comic’s Spiderman, Stan Lee, both observed – “With great power comes great responsibility”.



## INTRODUCTION

As we write this report in early 2013, Chris Hadfield is circling the globe in the ISS, the mysterious Higgs boson particle is now fact, and children in Canada and around the world are busy unlocking Anti-Gravity Boots to activate the power boost in Mega Jump, a free-to-download app from the Toronto-based development team at Get Set Games.

While arguably not as epic as intergalactic travel, it's clear the digital space offers its own mind-blowing assortment of digital experiences for children. Youth are negotiating thousands of mobile apps, virtual worlds, social networks and online games and they're doing it on web-enabled devices that range from tablets and laptops to 3D handheld game systems and mobile phones.

Given this digital tsunami, it's important to pause and reflect on the demographics and developmental needs of the young audience immersed in these 21<sup>st</sup> century experiences. The digital development industry in Ontario, and abroad, is busy innovating and marketing to a generation of children who have demonstrated enormous passion and purchasing power. This report looks at the developmental needs of this audience and considers the current landscape of digital media on tap for kids. It also provides a framework of ethical considerations for Ontario developers marketing and monetizing their content as well as a best practices tool kit to guide content creators working in the children's media space. We think most developers creating content *for* kids are motivated to do right *by* kids. They understand there's a solid business case to be made if you get it right and you will win over more people by being transparent in all you do. Especially when that audience is kids.

It's tempting for developers to move full throttle into the children's space. There is no question that the category is on fire. There are few children who don't know their parent's Apple ID password or indeed have their own and they're using that password to program their own media agenda. Their parents have also embraced digital content; there is a genuine thirst for quality and a willingness to pay for it.

But the audience is children – who click, swipe and “live” in the moment. They are impulsive because they are, well, children. Their thoughtful, rational pre-frontal cortex and right inferior frontal gyrus – brain centres that inhibit “I want it now” and “instant reward” impulses – are still a work in progress. They almost always opt for instant gratification – as clearly demonstrated in the famous “marshmallow” experiment.<sup>1</sup>

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<sup>1</sup> In Dr. Walter Mischel's marshmallow test at Stanford University in the late 1960's, children were given the choice of having one marshmallow right away or waiting and receiving more marshmallows. Often children were unable to delay gratification even if it offered greater rewards (Lehrer, 2009).

Game mechanics that employ what's known as a 'compulsion loop' take advantage of our poor struggling pre-frontal cortex, (in adults as well as children) and create what are called quite aptly "addictive gaming" experiences. If a grown-up can't stop playing Bejeweled - imagine what it feels like for a child. According to Professor Warren Bickel at Virginia Tech - "Unless you're trained to control your impulses why would you? Instant gratification is fun and that's what today's technology is teaching us." (Begley, 2011).

So the interactive experience you create and the tactics you use should be rooted in age-appropriate business practices and a clear understanding of what is and what isn't beneficial to kids.

During our 10 months of writing and research we came across many Ontario developers who are doing all the right things – from interactive design to marketing. They show a deep understanding and respect for children. We mention some of them by name and showcase their work in our report. At the same time, the "digital gold rush" is on. There are new entrants into the market who are often small operations and new to children's media development. They have a limited understanding of the technical, legal and regulatory framework around children and have given reduced consideration to their developmental needs. What we hope is that this report shares important knowledge, captures best practices and becomes a catalyst for learning, conversation and change across the children's digital publishing industry.

## **kidsmediacentre, Centennial College**

### About the Authors

The kidsmediacentre is a research centre and think tank at Centennial College's School of Communications, Media and Design. Working with our Children's Entertainment Program and Early Childhood Education Lab Schools, we research children's media experiences to better understand the role technology and media plays in shaping their lives. As importantly, we work with the children's creative industry to research and optimize communication with an end goal of developing media content that's both inspiring and enriching for children and their families.

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## Purpose of this Ethical Framework

The goal of this report is to develop an ethical framework for digital publishers and developers engaged in the *marketing and monetization* of child-targeted digital media content. The review and framework takes into account online and mobile content for preschoolers, school-age children, adolescents and teens. It is intended for both digital media studios who specialize in children's content and new players who hold intellectual property (IP) and are attempting to extend it into the digital world (i.e. television producers, book publishers, magazine publications, etc.).

The children's television and digital industry in Canada is highly regarded on the world stage for developing inspiring, intelligent content that engages children. At the same time, the children's industry is also an engine for lucrative, creative economy employment. Our Centennial College team appreciated the entrepreneurial spirit we encountered when we interviewed many of Ontario's most successful children's developers. We also appreciate the sensitive balance that exists between innovation and brand-building, and respectful, age-appropriate development. Ultimately, our hope is that this report strengthens Ontario's position as a centre of excellence in interactive digital media and children's entertainment because it is clear to us that good and responsible children's content development is afoot in this province.

### Know your Audience....

We've created this framework to help developers better understand the needs and abilities of a child audience. That, in turn, should assist them in developing responsible age appropriate marketing practices. Developing best practices starts with knowledge and an understanding of the skills and needs – emotional, intellectual, social, physical - of a child at their various ages and stages. We're not suggesting you need to be a developmental psychologist or educator to develop an app. But it's important both to your brand's success and a child's potential if you have some understanding of a child's learning and developmental trajectory.

To help with your brand development and marketing strategies, we've included a summary of children's developmental milestones. We've divided these into five core "life" curriculum skills including *language development, creativity, social/emotional growth, numeracy and science and technology*. While there are many more learning goals embedded in children's formal educational curriculum, integrating these into digital entertainment for children is a win for children and a win for developers. Bear in mind, over 80% of the top selling paid apps in the Education category of the iTunes Store target children. Parents want to know their children are benefiting from screen time; creating exciting digital experiences grounded in a child's developing knowledge needs will serve Ontario developers well.

## Digital Rules...

This document's scope also includes a synthesis of key legal policies and guidelines governing the creation of digital content for children both in Canada and the U.S. In many cases, the websites children visit and apps they play know no borders.

Recognition of children's special developmental needs is enshrined in a number of media related statutes or codes, including:

- Canada's Privacy Act including PIPEDA - Personal Information and Electronics Document Act
- U.S. government's – and, in particular, the Federal Trade Commission's – child privacy protection policy - COPPA - Children's Online Privacy Protection Act
- Canada's Broadcast Code for Advertising to Children

Ontario developers need to be familiar with these documents if they are creating content for children. **Digital publishers also need to be aware of recent COPPA changes that went into effect July 1, 2013** given many Ontario developers' products are used by American children and privacy policies between the two countries often overlap.

The Federal Trade Commission in the U.S. and the Privacy Commissioners in Canada have laid out these guidelines to keep children safe and to provide parents with the reassurance that the digital space can be a positive one for children.

## Approach & Methodology

The kidsmediacentre team – Centennial College researchers and Children's Entertainment Program graduates - analyzed current trends and practices in the children's digital media and entertainment community.

To aid in this analysis, we adopted a *case study approach*, reviewing the published content, selling and marketing practices of a broad cross-section of **Ontario** developers. Some of these developers are wildly successful children's content producers with broadly-distributed, multiplatform brands and disciplined marketing practices. Other developers we met are new to the game, figuring it out as they go along.

The research team looked at more than 40 Ontario properties, analyzing their children's content, approach to privacy, advertising tactics, monetization tools, social media practices, community guidelines and expectations. Our goal was to review children's properties that feature:

- A diverse range of developers and publishers
- A variety of products

- A cross-section of target groups
- Developers who self-publish (i.e. create their own site)
- Developers who sell their property (i.e. game) to a private or public broadcaster

The products reviewed were chosen because they represent a broad cross-section of child-targeted media properties, including:

- Virtual worlds and community sites
- Online games or trading sites
- Mobile apps and games
- Digital publications
- Streaming media sites
- Transmedia properties with components in the online, linear and mobile space

Each property was assessed based on its usability, age appropriateness, the ability to create a compelling user experience and plans for monetization and promotion. As a team, we assessed this expansive frame of digital media to see which properties could be looked at as examples of best practices and which properties were still in need of improvement.

To provide added insight to our methodology, the research team interviewed leading developers, content creators and broadcasters in the Ontario children's interactive space exploring their internal brand development and marketing processes. These were qualitative, structured, face-to-face interviews held with senior company principles. A full list of the developers we met with can be found in Case Studies and Developer Interviews (pages 76 - 131).

We also wanted to consider the broadcaster perspective and their policies and practices around marketing children's content. The broadcaster hosts the experience and is therefore responsible for communication with the end audience – generally both children and parents. The broadcaster must also ensure compliance with child oversight and regulatory guidelines such as COPPA and PIPEDA, determine the degree of social integration and community engagement (forums, user generated content, leaderboards, chat) and establish the level of community management required to keep children safe.

Finally, to better understand the legal and regulatory environment in Ontario and Canada, we met with James Kosa of Deeth, Williams Wall, one of the top information technology law firms in the country. The kidsmediacentre also interviewed Ontario's Information and Privacy Commissioner, Ann Cavoukian (2011) about children's privacy

and the Ontario Government's Privacy by Design focus and we have referenced that interview in our research as well.

## Focus of Report

Our analysis focuses on three specific areas:

### A) Child privacy and safety

- Privacy protection and transparency
- Regulatory compliance
- Informed consent practices
- Using third party accountability

### B) Child Development Considerations

- Developmental milestones and content opportunities
- Soft vs. hard learning skills
- Game mechanics and age suitability/usability

### C) Marketing and Monetization Practices

- Revenue generation and monetization tactics vis a vis the intended child audience
- Transparency around marketing practices, i.e., financial literacy for kids
- Social media integration – community engagement
- Advertising and promotion



## KEY FINDINGS

### Children's Privacy Protection: Legal Landscape

#### Canada's Federal Private-sector Privacy Law: The Personal Information and Electronics Document Act (PIPEDA)

In Canada, children's privacy is governed by a number of federal and provincial privacy Acts. At the heart of these guidelines is the Federal Act, PIPEDA<sup>2</sup>, The Personal Information and Electronics Document Act (April 13, 2000 – present). PIPEDA regulates and protects a consumer's personal information collected, used or disclosed to private sector organizations in the course of conducting commercial business (Government of Canada, 2013). The Act ensures organizations respect an individual's right to privacy, and stipulates a company may only use or disclose personal information that a reasonable person would consider appropriate, "under the circumstances". It also acknowledges that organizations may require the collection of some personal information to conduct business.

*"Don't pretend you don't know your audience. Once you know your audience you have to act. The law compels you. What some developers seem to be doing - willful blindness - will not help them in court."*

**James Kosa, Lawyer, Deeth Williams Wall**

Canada's Privacy Commissioners prefer to take a principled approach to the enforcement of Canada's privacy laws, and challenges to PIPEDA are decided on a case-by-case basis. The Ontario Privacy Commissioner and Privacy Commissioners across the country have focused on educating developers about *Privacy by Design (PbD)* - an approach to protecting privacy by embedding it into the design specifications of technologies, business practices, and physical infrastructures. That means building in privacy **up front** – right into the design specifications and architecture of new systems and processes (Information and Privacy Commissioner, 2011).

The cornerstone of the PIPEDA legislation is informed knowledge and consent around the capture and storage of an individual's **personally identifiable information**. Specifically, have developers put safeguards in place to ensure that meaningful and verifiable consent is duly obtained when developers access an individual's personal information? Have they provided Terms of Service and a Privacy Policy outlining the

<sup>2</sup> [http://www.priv.gc.ca/leg\\_c/leg\\_c\\_p\\_e.asp](http://www.priv.gc.ca/leg_c/leg_c_p_e.asp)

treatment and management of personal information?

The specific treatment of children is **not** outlined in PIPEDA, which some legal experts whom we interviewed identify as a weakness in the legislation. Ontario Privacy Commissioner Ann Cavoukian argues PIPEDA's broad sweeping provisions and principles are the same whether a developer is targeting adults or children. *Informed consent* applies across all user age groups although she acknowledges developers need to be even **more** vigilant around minors and to ensure meaningful and verifiable consent - from a parent or guardian - is obtained (Cavoukian, 2011).

PIPEDA stipulates that giving consent must be easy and accessible and importantly, children's data should not be collected because they cannot be expected to give consent (CBC.ca, 2011). In updated privacy guidelines released December 6, 2011, Canada's Privacy Commissioner Jennifer Stoddard said organizations must avoid knowingly tracking children on websites aimed at young people:

"Children are not likely able to provide the meaningful consent required under our privacy law for the tracking of their online activities. This is an increasingly important issue as we see the average age of first-time Internet users dropping. If an individual can't say no to the technology being used for tracking or targeting, then the industry shouldn't use that technology for behavioural advertising purposes. In the current online behavioural advertising environment, that means no use of web bugs or web beacons, no super cookies, no pixel hacks, no device fingerprinting and no to any new covert tracking technique of which the user is unaware and has no reasonable way to decline." (Stoddard, 2011).

While the updated PIPEDA guidelines released in 2011 reference web-based tracking tools, the law and legislation supports all tracking technology that puts children at risk (see Infographic # 2: Privacy Primer, page 136). A fallback position of "we didn't build the site for children" is not a defense. If it's discovered a digital publisher has been tracking and collecting information about its users, and its users are children, PIPEDA holds you to account.

## **The Children's Online Privacy Protection Act: COPPA**

In the U.S., children's privacy protection is enshrined in the *Children's Online Privacy Protection Act* (COPPA). Specifically, the COPPA Rule prohibits websites and online services from collecting **personally identifiable information** from children under 13 without verifiable parental consent (VPC). While developers in Canada are governed by PIPEDA, COPPA legislation extends its reach to developers whose products are used by U.S. citizens. Indeed, many Canadian companies, broadcasters and developers rigorously ensure their privacy practices align with COPPA given the borderless nature of the Internet.

COPPA shifted the definition of a minor from 18 to 13 when it was first introduced to the digital marketplace in 1998. Following suit, early social networks like Myspace, Friendster and later Facebook built their privacy guidelines and age restrictions around COPPA legislation and 13 years of age is now widely accepted as the “age of consent” in the digital sphere.

*"Foreign based websites must comply with COPPA and the Rule if they are directed to children in the United States, or if they knowingly collect information from children in the U.S. The definition of OPERATOR under both COPPA and the Rule includes foreign based websites that are involved in commerce in the United States or its territories."*

<http://www.ftc.gov/privacy/coppafaqs.shtml>

### **COPPA Age Verification**

The U.S. Federal Trade Commission (FTC), the body responsible for enforcing COPPA, recommends developers use neutral screening language (age gate) and request *specific date of birth information* rather than simply asking the question whether the user is over or under age 13 (Children's Online Protection Act of 1998). In its Report to Congress entitled *Implementing the Children's Online Privacy Protection Act*, the FTC states its views on online age verification as follows:

*"A site that has a log-in registration page that only permits a visitor to enter a birth year starting with age 13, or that flags for visitors the fact that children under 13 are not permitted to participate on the site, may invite age falsification. By contrast, a site that allows visitors to enter any date of birth, and does not indicate why it is seeking such information, may be able to more effectively screen out children under age 13."* (Federal Trade Commission, 2007).

The FTC also encourages sites use a mechanism to prevent children from back clicking to change their date of birth once they have been blocked from a site.

### **COPPA Rules**

The key goal of COPPA is to give parents control over the information collected from their children in the online space. The Rule was designed to protect children under 13 while appreciating the dynamic nature of the Internet. COPPA rules apply to **operators of online services – including mobile apps - and commercial websites, targeted to children, who collect, use or disclose personal information from children**. If children are required to disclose personal information (i.e., name, e-mail) in order to access

digital information of any form, or if the site collects or passes along a child's **personally identifiable information**, then COPPA applies. This is true even of digital properties that do not identify children as the primary audience (COPPA refers to this as a "general audience" or "mixed audience" (9-14) site). If you, as an operator, have **actual knowledge** that children under age 13 are visiting or using your property or product, and you are using or collecting any of their personal information, then COPPA guidelines must be observed.

According to COPPA, if children under 13 are visiting your site or using your online service, developers must:

1. Post a clear and comprehensive online privacy policy describing the information practices for personal information collected online from children.
2. Provide direct notice to parents and obtain verifiable parent consent, with limited exceptions, before collecting personal information online from children.
3. Give parents the choice of consenting to the operator's collection and internal use of a child's information, but prohibiting the operator from disclosing that information to third parties (unless disclosure is integral to the site or service, in which case this must be made clear to parents).
4. Provide parents access to their child's personal information to review and/or have the information deleted.
5. Give parents the opportunity to prevent further use or online collection of a child's personal information.
6. Maintain the confidentiality, security and integrity of information they collect from children by taking reasonable steps to release such information only to parties capable of maintaining its confidentiality and security.
7. Retain personal information collected online from a child for only as long as necessary to fulfill the purpose for which it was collected and delete information using reasonable measures to protect against its unauthorized access or use.
8. Not condition a child's participation in an online activity on the child providing more information than is reasonably necessary to participate in that activity (COPPA FAQs, 2013).

### **Updating COPPA – New Rule takes effect July 1, 2013**

In December 2012, the Federal Trade Commission amended COPPA legislation to strengthen privacy protection and give parents greater control over the personal information that websites and online services collect from children under age 13. The updates to the legislation are also meant to cover evolving technologies, such as mobile devices and social networking, and the way children interact with these technologies. **Amendments to COPPA go into effect July 1, 2013 and affect any operator or online service whose properties are used by children in the U.S.**

The key amendments to COPPA are as follows:

- Expansion of personal information to include photographs, video and audio files with children's information. If developers are collecting any of these new categories of personal information from a child, they **must** obtain parental consent. Geo-location data was included in the previous revisions to COPPA and while not a new category, there is additional emphasis in the 2012 ruling to ensure parental consent is secured for any geo-location features. Any photos or videos containing a child's image or audio files prior to the effective date of the amended Rule are not affected.
- A screen name or user name is considered personal information when it functions in the same manner as online contact information which includes not only an email but any other substantially similar identifier that permits direct contact with a person online.
- COPPA has closed a loophole that allowed child-directed apps and websites to permit third parties to collect personal information from children through plug-ins without parental notice and consent.
- The Rule extends coverage so that the third parties doing additional data or information collection i.e. advertising networks (ad serving) with access to children's information, have to comply with COPPA.
- The prohibition of persistent identifiers such as IP addresses, customer numbers held in a cookie, usernames and mobile or processor device serial number or identifiers that can actively or passively track (i.e. push alerts) or recognize users over time and across different Websites or "online services". The term "online service" broadly covers any service available over the Internet, or that connects to the Internet or a wide-area network. Examples include operators and services that allow users to play network-connected games, engage in social networking, publicly post personal information, purchase goods or services online, receive online ads, or interact with other online content or services. Mobile applications that connect to the Internet, Internet-enabled gaming platforms, voice-over-Internet protocol services, and Internet-enabled location-based services also are online services covered by COPPA.

According to the COPPA FAQs (2013), there are some caveats around **support for internal operations** and the FTC suggests operators "disclose in your privacy policy, and in your direct notice to parents, your collection, use or disclosure of such persistent identifiers unless (1) you collect no other "personal information," and (2) such persistent identifiers are collected on or through your site or service solely for the purpose of providing "support for the internal operations" of your site or service." (Federal Trade Commission, 2012).

In the briefings and hearings that led up to the COPPA amendments, a great deal of discussion surrounded that fact that - as well as 1998 COPPA guidelines had performed - they failed to address privacy hot-button issues connected to new technologies and platforms. Persistent identifiers like IP addresses, cookies and web beacons allow developers and marketers access to user data and the possibility of rich, user analytics (see Infographic # 2, Privacy Primer, page 134) which can be used to serve behavioural advertising. This kind of tracking allows the aggregation of disparate bits of data, which children can't reasonably be expected to understand. While the technology in many cases allows developers to offer customized tech support, update content and troubleshoot specific bug and device issues, it also puts children's personal information and safety at risk. As a vulnerable population, often visiting websites and downloading apps "sans parent oversight or knowledge", U.S. policy makers agreed children had to be better protected in the digital space. COPPA had the unenviable task of updating children's data protection while respecting developers' need to innovate, a challenge to be sure.

Full details and FAQs on COPPA amendments can be found on the FTC site.<sup>3</sup>

### **FTC Finds App Developers on Thin Ice**

In the December 2012 FTC report, *Mobile Apps for Kids: Disclosures Still Not Making the Grade*, the FTC revealed only 20% of 400 apps targeted to children included any privacy statement before or after the app was downloaded (Federal Trade Commission, 2012). The report stated many apps contained advertising most parents would find objectionable and age-inappropriate, or included links to social media services such as Facebook and Twitter that parents likely wouldn't appreciate.

In the report, the FTC also discovered that almost 60% of apps sent device identification data to app developers or third parties such as Ad Networks and analytic companies. The FTC will be investigating mobile app developers who appear to be violating laws protecting children by not disclosing types of data capture used and not securing verifiable consent (violators will face civil penalties of up to \$16,000 per violation) (Federal Trade Commission FAQs, 2013).

In-app monetization practices in Free-to-Play (F2P) or "Freemium" apps that children play have become one of the most critical concerns for the FTC and the ethical children's content industry. The rash of stories in the news around children spending hundreds and thousands of dollars on in-app purchases suggests app developers will be under the FTC regulatory microscope for some time to come (Apple Insider, 2013).

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<sup>3</sup> <http://www.business.ftc.gov/privacy-and-security/childrens-privacy>

## Child Development Considerations

### Developing age and audience appropriate digital experiences

COPPA and PIPEDA guidelines are rooted in a comprehensive understanding of child development principles. The COPPA statute and PIPEDA legislation were drafted by industry organizations and regulators to reflect community best practices around what a child under 13 - or a child over 13 - can reasonably understand about the collection of personal information and its relationship to privacy. Children come to value privacy if they understand its relationship to safety or, in the case of a malware-infected download, if their personal or their family's privacy is compromised.

The same child development principles used to protect children can be incorporated in the design of children's interactive media. Indeed, some of the most successful interactive content for children is built on an understanding and appreciation of the learning potential and developmental capabilities of children.

### Ontario Developers Score an A on Age-Appropriate Development

We met some remarkably talented and conscientious developers during this best practices process. Many have built internationally successful children's properties that promote active learning and focus on the developmental needs of an age group. Their success is often rooted in an insight – ten year old children are intrigued with the concept of evil (League of Super Evil) – every child has an inner paleontologist dying to get out (Dino Dan), drawing while we read makes reading infinitely more memorable (Draw Along Pip).

The BEST games and interactive media reviewed offer a brand and product that's rooted in a child's growing curiosity and fascination with the world. They do what great children's media has always done: engage a child socially, emotionally and intellectually in order to help the child learn. Compelling kids' digital media delivers that all-important, top-of-brand-pyramid benefit of "fun", while still offering important learning outcomes.

According to child development expert Ellen Galinsky, there is no cognitive learning without social emotional learning and no social emotional learning without cognitive learning. "Although there are times when learning is more cognitive than social or more emotional than cognitive, when children are fully engaged in learning, they are engaged on all these levels. And life skills - such as the ability to take the perspective of others, critical thinking, and self-control - involve these levels as well." (Galinsky, 2012).

A child's job growing up is to *learn how to learn* and perhaps the most important question a developer can ask at the early conceptual stage of creating their "brand" is *what's in it for kids?* Ethically, that focus – what's in it for kids – produces very different digital outcomes than a "what's in it for us" roadmap.

### **A Child's Learning and Developmental Trajectory: Getting the Content Right**

Age-targeted and optimized interactive design starts with a clear and reflective understanding of a child at their various ages and stages. Key to developing age-appropriate digital experiences for children is familiarity with the developmental milestones that children must achieve to grow and succeed in life. Language development, for example, is central to children's intellectual, social and emotional growth and rich interactive experiences can help foster skills like listening, speaking, writing and reading.

There are many important milestones for children but for the purposes of our document we have focused on some of the skills and content areas that can be incorporated through meaningful digital design. These include:

- *Language and communication*
  - *Creativity*
  - *Social and emotional growth*
  - *Cognition: Thinking and problem solving*
    - *Numeracy*
    - *Science and technology*
- (PBS.org, 2013)

Best practices in the interactive digital media space reflect an understanding of the needs of a child and youth audience. Digital experiences that build on critical milestones can easily support a young child's learning in the same way that a great book or toy can.

If your audience is pre-school and early school-aged children, it's important to know that this age group learns about themselves and their environment through true concrete experiences. They move to the next stage in their development by repeating an experience over and over. That pattern of learning – seeing things that are concrete, assimilating and accommodating new knowledge – provides the building blocks of child development. It provides a comfortable, graduated environment that opens up all of the child's senses to learning. Until they're close to seven, children can only tell you what they know and what they've seen (concrete learning). They start thinking more abstractly – moving from "what happens when" to "what happens if" around seven or eight.

Developers who take the time to understand children's milestones and the content areas and skills required for children, can provide greater opportunities for learning. They understand the best experiences for very young children build on what they know. They understand when they can accelerate the learning curve and introduce new skills and variables into gameplay and interactive design. It's not rocket science but it does require research, consultation and due diligence.

From a marketing and brand development perspective, it's critically important to start the interactive process with a developmental portrait of your audience so your content and design is age appropriate and grounded in children's interests, abilities and learning needs. It's beneficial to your product design and its market-fit if your team has a meaningful understanding of the potential audiences' stage or stages of development. Children are passionate about learning when it's fun and matches their skill level, which is as much a measure of your developmental skill as it is theirs.

### **Age Appropriate Development**

While children grow at varying rates, most children pass through a predictable pathway or sequence of developmental milestones. Along the way we want to challenge and stimulate them with a variety of play and interactive experiences. This environmental stimulation is critical to a child's cognitive, physical and social/emotional growth. The media we put in front of children can serve as a distraction or it can provide enjoyment with real learning. With the kidsmediacentre team's experience in media research and Early Childhood Education, we've seen how media, when used appropriately, can play an important role in a child's healthy development. To ensure children get the most out of interactive media, consider the following benchmarks:

- Does the digital experience you're creating inspire a child's imagination and fantasy play?
- Does your interactive concept introduce new knowledge?
- Does the experience increase a child's language ability?
- Is the use of language age appropriate for the child you envision playing this game?
- Does it help contextualize that knowledge in a manner appropriate for the target age-group?
- Is the core idea or storyline fun and does it stimulate a child's growing sense of humour?
- Is the navigation intuitive?

Early usability and effective user interface (UI) for children should take into account the following concrete developmental milestones:

#### Reading ability:

- Will they need “see/say” functionality or audio directions?
- How much text is too much?
- Do they speak your language?
- Do you speak theirs?
- Is the text size appropriate for young readers?

#### Exploratory behavior:

- How much will curiosity drive their actions?
- How much parent-support will they require to navigate?
- How much social encouragement?
- Are you helping parents help their kids?

#### Attention span:

- How much time can the audience be expected to spend on the site?
- How many instructions can they realistically process?

#### Ability to follow UI conventions and prior experience with mobile and web-based play:

- Do they understand standard iconography?
- Do your primary navigation controls make sense vis-à-vis audience age or will parents be enabling the experience?

#### Critical faculties:

- Are they old enough to differentiate advertising from content?
- Can they assess the difference between purchasable goods with ‘real’ transaction costs and virtual cash
- Can they differentiate between on-site and off-site links?

Play-test your experience iteratively, ideally throughout the development process, to determine what’s working and what’s not. Building an audience of play-testing families can be a labour-intensive process. Parents are naturally wary of handing their children over to development studios for market research, but consider making it a fun event and tying it to the development of a transparent brand persona. Try to strike a balance between research and entertainment.

Children’s media doesn’t always have to be about hard curriculum, but parents – while they’re still in control of children’s media content - are more likely to download or purchase media that they believe is having a *positive impact* on their child’s life. Linking learning outcomes or curriculum components to a property’s gameplay is a savvy business decision and a best practice for any developer interested in smart, ethical marketing to children. What’s key is ensuring the educational outcomes are relevant and the learning is real!

Infographic # 3: Child Development Milestones, pages 137-141, includes children’s key developmental milestones at various ages and stages. These represent some of the core concepts, learning outcomes and basic considerations developers may want to consider when designing digital experiences for children.

*"As an educational Children’s Media producer, every project has to start with an educational outcome. We have an educational blueprint that maps it out for us, so that no matter what the platform, safe usability for the target audience is our focus. If we say one and one equals two, we have to make sure that it meets and delivers on the end objectives."*

**Pat Ellingson, Creative Head, TVO**

## Developing Responsible Gameplay

Game development tends to focus on game mechanics, engagement, and creating an experience that leaves players wanting more. According to Jane McGonigal, author of *Reality is Broken*, researchers measuring physical reactions to a well-designed game, discovered the strongest *positive* reactions come when we fail at games. The right kind of failure makes gamers eager to do better. "It makes us more engaged and more optimistic about our odds of success." (McGonigal, 2011).

So while on the whole, good game and experience design balances the need for mastery and reward, it’s important to also think through the failure curve and the appropriateness of your product’s difficulty-level with children’s developmental stages.

An important distinction needs to be made between *frustration* and *failure* in children’s product design. A failure element - done right - can fuel our drive to succeed. A frustration element can purposefully include obstacles to completion that require the player to make a purchase or to create a marketing channel through social media. This is by no means unethical in digital design for adults. In children’s media, however, these ‘frustration’ mechanics can lead to behavior that is ‘against the rules’ or otherwise compromises a child’s integrity as a member of a family unit. It’s a key aspect of digital experience design for children that mechanics - no matter how difficult - do not undermine parent decision-making or encourage risky behaviour.<sup>4</sup>

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<sup>4</sup> "Undermining parents" could include everything from placing undue influence on kids to buy (i.e., "more fun, more friends, more excitement, more options" if they buy a Club Penguin virtual membership) to offering \$99.99 in-app purchases on a children’s app.

An important consideration for children’s publishers is whether the interactive experience you’re creating respects the cognitive limitations, incredulity and developmental level of the child being targeted. While many developers we spoke to in Ontario are well versed, and indeed, self-educate around these parameters, there are a host of child-targeted websites and apps where revenue generation and shareholder accountability supersedes child development considerations.

A quick series of questions will tell you which side of the divide any particular experience is on:

- Does the game provide an enjoyable, emotionally appropriate environment that makes children want to return, **or**, does it exploit them by making them feel guilty when they’re not playing?<sup>5</sup> e.g., a player’s crops wither and die in Farmville; a child’s virtual pet suffers – gets hungry, unhappy and unhealthy - when they’re not logged in (Webkinz).
- Does the game provide an environment where access to new content can be acquired through achievement or skill, **or**, does the game make children feel anxious or deprived because they can’t afford to purchase “exclusive” content? e.g., a user can submit a puzzle to the app Burn the Rope and potentially have this puzzle added as a new level to the game.
- Can a child work through a game at their own pace, encouraging them to succeed and become more proficient, **or**, does the game require children to play frequently, almost compulsively, in order to access new content, items, or prizes? e.g., The Doodlecast app is a child-led experience where a child narrates their own drawings; there is no ‘win’ or ‘get’ in this experience, just open-ended creativity.
- Does gameplay offer opportunities to progress through levels at a reasonable speed, **or**, does it move at a *frustratingly slow pace* driving children to make in-game purchases (with real money) to advance more quickly? e.g., While not an Ontario studio game, report authors wanted to test the rate of progression and patience threshold required to play the uber popular mixed audience game Hay Day (App Store age designation: 4+). Read the kidsmediacentre blog post here: <http://kidsmediacentre.ca/2013/03/26/make-hay-day-while-the-sun-shines>

The answers to these questions will reveal whether a game is focused on the goals of the developer, or the needs of the child. **A successful kids’ product is a boon to both;** however, in creating products for children it is the developer’s responsibility to balance the needs of the studio against audience needs. **The audience always comes first.** Working the other way around is **not** a recommended practice.

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<sup>5</sup> We refer to this as “sticky content” in the case studies.

## Hierarchy of Engagement: What Keeps Kids' Playing?

We examined the gameplay and interactive elements of a variety of digital properties to more fully understand the hierarchy of engagement. What makes a digital experience for children successful? What keeps a child returning to an interactive experience, game, series or online world again and again?

Consider the following as a more detailed examination of the ways in which developers keep their audiences playing:

### Game Experiences

Fun, Engaging, "One-off"	Users return to play solely based on WANT – not NEED. This includes non-reward based gameplay such as an interactive eBook or a drawing application.
Level Up Play	A gameplay experience in which the only goal is to climb to the next level; players are intrinsically motivated and return solely for the engagement of the play itself.
Leaderboard	Players return for the engagement AND to amass points for playing. A player may be ranked on total playing time and WANT to become better. Extrinsic rewards - specifically a player's desire to be recognized for their gaming prowess - drives leaderboard interaction.
Expert Gamer	Players NEED to become better in order to climb the ranks within their community. An expert gamer plays and masters a game to gain status and may be seen as leader by other players. Competitive play becomes increasingly important. An expert gamer may share their knowledge with fellow players in forums or walkthroughs.
Game Motivated Return	Content such as new levels, new characters and new items are added <i>each day</i> to keep the audience coming back. The player moves up the "emotion hierarchy", becomes more invested in gameplay and NEEDS to return to the game to heighten the game experience and continue improving.
	In the case of children, daily incentives create a compulsive feedback loop (think: Tamagotchi's) and can potentially undermine parenting. According to a child in a kidsmediacentre research group "if you need to go on the website everyday your parents may get mad. What if your parents don't let you go online every day? What if you have homework?"
Reward Based Return	A player is <i>rewarded</i> for returning to the game with prizes, tokens, coins or points. Rewards may accelerate and be refreshed daily or even hourly and the player NEEDS to return to the game to collect these rewards. This creates a highly COMPULSIVE experience known in gameplay parlance as "the compulsion loop".
Game A.I. Mechanics	In many sandbox or simulated economic games like Lemonade Stand or Tiny Tower the game continues even when the player is not actively playing. These games run in real time and follow a 24-hour clock: Lemonade is sold even while the game is dormant; the residents of Tiny Tower continue to work, eat sushi and go to the gym even if the game is not being played. This AI is amusing to an adult but can be intrusive to children who often develop a strong emotional attachment to their virtual creatures or citizens.
	Developers need to be cognizant of this when they incorporate AI into the game design. The standard routine of push notifications, reminders or rewards may not be as necessary to keep children engaged. It's better if the game is relatively dormant when not in active use so that children do not feel 'compelled' to make sure everything is okay for their virtual friends, pets or creations.

Pay to Play	<p>Rewards may also be required to enhance the game experience – this may come through <i>purchasing</i> in-game currency, tokens, weapons, additional content, etc. “Paying to play” is a reasonable expectation given the costs associated with building an interactive experience. However, the tactics and marketing of these features must inform the parent, respect the child and not create undue pressure to buy.</p> <p>In the console game Skyrim, players collect items in the game, which can be traded for currency. That currency can be used to purchase enhancements. These enhancements allow you to progress more quickly through the levels.</p> <p>In Webkinz, players are promised an enhanced experience with additional “deluxe features” i.e. Deluxe membership can include exclusive items and themes, personalized speech bubbles, unique smileys, customized phone, a personalized hat for your pet and more!</p>
Consequences for Absence	<p>Success and achievement are threatened by absence (crops dying etc.). Player may lose the achievements and time invested in the game if they don't return. In this case, the player is COMPELLED to return in order to avoid negative reinforcement – the feeling of guilt or failure if the player neglects to return.</p>
Social Gaming	<p>When engaging in a social game, the player is motivated by the desire to play the game AND engage and connect with others. This gameplay can be competitive or cooperative, but it's essential to have a “player two”. The second player does not always need to be present or playing at the same time, though that tends to be preferred. In some games, turn-based play allows children to engage at their own pace. Even when “player one” is not logged in, the second player can take their turn and proceed with the game. When the child RETURNS to the property, the second player's contribution will be waiting for them. The important feature of social gaming is that it is not done in isolation.</p> <p>Draw Something is essentially virtual Pictionary. Player one selects and draws a word from a list then sends it to player two. Player two is notified, logs in, and guesses the word. Player two selects a new word and sends back a drawing.</p> <p>Words With Friends is similar to Draw Something, however, instead of Pictionary the gameplay is modeled after Scrabble.</p> <p>Mr. Young Decks is a virtual trading card game. Players can ‘trade’ duplicates from their deck by sending a request to another player. When the next player logs in, there will be a notification waiting and they can choose a card from their deck to send back.</p>

Developers have the opportunity to make huge emotional and intellectual connections with children. Between rewards, interaction and community, there are a lot of touch points and connections built into children's digital media that influence the childhood experience. Failure design is one of them.

When developing games for children it's important to maintain the possibility of failure. A game without risk is substantially less fun. But, when developing for young audiences the risk should not be tied to a monetary expense. For example: A crop *should* need regular watering, but it's not recommended that gameplay include a mechanic in which a crop will die if a child does not return *every hour*. *Additionally*, failure mechanisms should only be tied to player actions, not purchasable goods. Purchasable goods should enhance play; they should only be required to maintain the playable state of the game.

## Emotional Connections with Gameplay

A digital experience has the power to impact a child socially and emotionally and the spectrum of emotions a child experiences when they “play” online can leave them feeling fulfilled or frustrated. We’ve done enough usability testing at the kidsmediacentre to know that the best children’s games emphasize fun, interaction and challenge. If there is one-word children consistently use to explain why a game is great, it’s *challenge*. Games that are too easy, i.e. masher games, offer mindless, repetitive, robotic play. Games that are too hard frustrate and children quickly click away – or worse – they ask if they can stop!

The “best” interactive media helps move children along a continuum of mastery and achievement so the child walks away challenged but not defeated. Here are some examples of the range of emotions that may be experienced in games or interactive play:

*What response are you trying to evoke?*

Happiness	“I <i>like</i> this game – I <i>want</i> to play.”
Satisfaction and Accomplishment	“I did it. I’m good at this.” “My time was well spent.” (The child is rewarded with a positive feedback loop.)
Curiosity	“I wonder what will happen next” “Why is that happening?”
Confidence and Respect	“I help others play the game – I am consulted on gameplay. My opinion counts.”
“Fiero” or Triumph and Pride	“I’m the best of the best!” “That was so hard, I didn’t think I’d be able to do it.”
Fortitude and Tenacity	“This game is so hard I love it!”
Anxiety	“If I don’t finish this I will not be as good as my friends.” “I have to get back to the game. I’m not advancing quickly enough.”
Passion	“This is my favourite character” “I only play games about X.”
Obsession	“This game was totally made for me.” “I love my games, I have so many, I think I play a new one every week.” “I make a new video for my YouTube channel every week. I have 56 fans.”
Guilt and Poor Outcomes	“My plants will die.” “My animals will get sick.” “I’ve been stuck at this level for days.”
Frustration	“I can’t do this.” “This game is so slow – why do I have to wait to play.”
Shame	“I’m not supposed to be buying these coins.” “My parents can’t afford to buy me a membership.” “I’m going to get in trouble.”

There will always be tension and some anxiety in competitive play. These emotions are part of play, learning and developing new skills. However, if a design exploits negative emotions and encourages compulsive behavior by inducing guilt, shame or frustration, then it does not serve the needs of a child.

Children love to be challenged yet the challenge needs to be attainable. Also, the challenge should be attainable without the child *constantly* needing to spend more money.

## Developing Responsible Marketing and Monetization Practices

The majority of studios in Ontario are micro and small content creation studios with 10 employees or less (Secor Consulting, ESAC, 2011). Many of these developers are exactly that: developers. They're good at designing games and interactive experiences but confess to having little awareness of children's developmental needs. As many development teams told us, their goal is to create a memorable experience for their users, extend that brand across a multitude of platforms and into new markets and ultimately, to make money for their efforts.

Some of the developers we met claimed they had stumbled into the children's category. They initially built interactive experiences for teens and a young adult audience - games that they themselves wanted to play - and quickly found children migrating to their games or sites. Indeed all of these developers were surprised at the volume of users under 13 years of age who had discovered and were loyal to their brand. Other developers weren't concerned about privacy or marketing and monetization because they were under contract with a broadcaster; they simply created the game or website and left it up to the broadcaster to manage these issues.

Around issues of privacy and data collection, *established* developers with longstanding brand name recognition in the children's market appear to have a solid understanding of privacy requirements (COPPA) and the need to acquire parental consent before collecting or sharing information from children under 13.

Some of the app developers we met are at the other end of the spectrum and had little understanding of American regulatory guidelines - COPPA - and almost no familiarity with PIPEDA and concepts like Privacy by Design (Ontario Privacy Commissioner). Some of these app developers felt privacy considerations were less relevant to their business given the limited data collection and tracking allowed by Apple. Limited data collection meant they were relying on third party data from web analytic companies like Flurry, Facebook and ad networks to help define the demographics of their user base (practices not allowed under the new FTC guidelines) (Federal Trade Commission, 2012).

### What's *your* ethical MO?

Remaining ignorant of regulations governing monetization and marketing can be a strategic decision. Developers have spent months, perhaps years, developing their branded experience often pursuing different sources of private and public financing. They are eager to start generating income for their children's property. They see high profile sites like Miniclips, or apps like Tap Zoo and Temple Run which clearly attract children under the age of 13, integrating advertising, micro-transactions and social media links like Facebook and Twitter to help generate awareness. As one developer

told us “This is the 21<sup>st</sup> century version of the Gold Rush. That’s money to be made if you get it right.” Unfortunately, at times ‘getting it right’ means doing it wrong: like contravening COPPA or creating marketplace opportunities for users who do not legally have the right to spend their parent’s or caregiver’s money.

“Getting it right”, should mean respecting kids and parents and having a strong ethical foundation to your digital enterprise. Many Ontario developers are adopting responsible marketing and brand building practices. Many others – in Ontario and beyond – believe if children are registering, downloading and purchasing then it’s the responsibility of the parent to monitor this online behaviour. To quote basketball player Charles Barkley “It’s not up to me to raise your child.”

The reality of the situation is somewhere in the messy middle. Parents should make sure they provide oversight of their children’s digital lives. Developers are legally obliged to provide a framework in which children are not only protected from predatory data collection or predators, but also from their own limited impulse control.

## **Monetization Overview**

### **Websites, Virtual Worlds - Marketing done right *is* Monetization**

Many of the Ontario developers we interviewed in the web and virtual space live and breathe the role of entrepreneur. As small business owners they wear multiple hats including content creator, chief technology officer, producer, marketing director and media planner. Iteration, (aka learning by doing) was a common refrain and many developers admitted the creative thought processes around marketing and monetizing often suffered vis-a-vis their enthusiasm for development. As several content creators pointed out, the development part is easy; it’s making money that’s hard. To quote Andy Smith of Get Set Games, “We’re developers. We’re pretty lousy at everything else.”

There’s no doubt, balancing commercial interests with appropriate business practices in the children’s category requires a high degree of ingenuity. Children come with boundaries and guidelines. Developers need a solid understanding of regulatory guidelines and their audience’s developmental needs. Plus, before any developer starts building wireframes, they need to appreciate the importance of building brand trust with the “gatekeeper”. Brands that prosper in the children’s market with cross channel revenue streams – think Franklin books, movies, DVD’s, apps, games, pajamas, toys– these brands are embraced by parents because they deliver added value: great storytelling, meaningful characters and a healthy dose of learning. Make a list of A level brands and they all understand that while their product targets kids, they trade in brand integrity. Marketing done right converts to monetization.

## Revenue Streams

The number of revenue streams and corresponding business models amongst Ontario developers varies extensively based on the nature of the property (see Infographic #4: Marketing and Monetization Case Study Summary, pages 142-143).

Many of the interactive children's properties we reviewed had **no** monetization streams at all. Often this was because they had been developed for a Canadian broadcaster as service work. In other cases, various funding sources had propelled the brand to market, but after launch the developer appeared to run out of steam. Again, expectations around public sources are that funds help small or medium enterprises (SME) commercialize their product, in turn generating revenue and employment in the region.

**Digital sites connected to broadcast properties**, aka *convergent* properties, were amongst the most innovative in converting TV brand equity into a broader emotional experience for their fans. The broadcast producers we spoke to were highly aware of the importance of ethics - and optics - in the children's media business. Most were working hard to ensure alignment between marketing objectives and children's ethical and legislated needs.

Producer Sinking Ship, for example, has extended the success of their property Dino Dan into a number of categories including DVD's, plush toys, merchandise, iTunes distribution and apps. The web-based experience is hosted by TVOKids and therefore contains no advertising or monetization. All Dino Dan brand extensions come from children and families embracing the property and wanting more of it. Much of their growth is organic driven by a strong product and grassroots popularity.

Other brands like Skatoony treat the YTV web experience less as a monetization tool and more as a marketing extension tactic. They've moved their traditional broadcast success into the iTunes store with the sale of single episodes and full season series. They're also selling their newly launched Skatoony app in the App Store and experimenting with non-traditional advertising vehicles. Johnny Kalangis at marblemmedia says his company has bigger returns on marketing spend when they stick to online advertising. For marblemmedia, advertising their app in a print magazine is not as effective as advertising in the online space where a consumer is a click away from check-out. Recognizing the importance of winning over moms (think for a moment about the enormous digital sway of "momswithapps.com") they've been selling their message through advertorials on the yummysummyclub.ca.

The My Babysitter's a Vampire game, which airs on Teletoon, now advertises their new app Humans vs. Vampires on the broadcaster site. The app is free, however, there is revenue from an in-app purchase upgrade. The TV show is also available on iTunes offering season one for \$14.99 or \$2.99 an episode.

## Virtual Worlds - Get out your Wallet!

Virtual World producers have a long list of revenue streams. Webkinz by Ganz, an enormously successful and one of the first virtual worlds for children has monetized their brand at every juncture. Monetization principally includes the sale of plush toys, which Ganz sells at retail outlets or in their e-Store for purchasers outside of North America. The site encourages children to upgrade their standard membership plan in favour of the “deluxe” membership. Children are rewarded with virtual currency for watching third party advertising. Webkinz also encourages children to *buy* additional online currency (Kinz cash) to purchase “exclusive” items and sells merchandise like body spray, lip gloss, charms, apps and more. Lots of parents and marketers are uncomfortable with the *volume* of selling going on in Webkinz and the elitist thrust of deluxe branding arguing the site treats children as cash cows (not-so-ironically, Webkinz offers a game called Cash Cow). Other parents argue the site provides valuable lessons in the market economy and financial literacy.

The other virtual world we looked at, Wooz World, focuses on VIP subscriptions and virtual currency allowing users to customize their space. Wooz World does many things right from a privacy compliance perspective. They have built parental accountability into their site and feature the Privo safety seal, indicating they follow COPPA safety and privacy guidelines. The property allows safe built-in chat functionality and electronic site moderation (CRISP filtering). The brand monetizes itself, however, by convincing children and youth to spend their way to a premium experience and the amount of selling to children seems to have crossed a line. They also feature adult focused third party advertising (banking and healthcare) – and in the Terms of Use – don’t accept responsibility for the content of their advertising, which some might consider a questionable practice on a child-directed site.

### Other key revenue channels for Ontario developers?

- Scholastic has a huge hit on its hands with the book series and online game, 39 Clues. The website sells books and trading card packs in addition to book and merchandise distribution through its school pipeline.
- eBook company Skyreader cross promotes its other eBooks to drive monetization and is currently manufacturing an eBook making tool which it plans to sell to independent publishers collecting a share of their eBook revenues.
- Bitstrips has earned a lot of recognition for their comic making interactive content. Their creative business model includes Educational licensing fees, integrating Bitstrips into broadcaster portals and topping up their website with AdSense.

- iLearnWith educational apps (\$2.99 in App Store) have learned there are many different points of entry. The company is cross selling all their apps reaching out to teachers as a fun way to deliver curriculum to preschool and primary learners.
- Kidobi is working hard on the social media front to ride the video wave and court and support a community of parents who want a hand in curating their children's video agenda without the risk of inappropriate ads (think YouTube). Subscription fees of \$3.99 per month kick in after a one-month trial period.

The essential role of creativity to market and monetize in the children's category is clear. Developers need to be equipped with expansive knowledge to navigate and determine the best road forward for their brand. Monetization is fundamental to a vibrant children's category; ethical and transparent marketing is the challenge.

## The App Space ...it's messy

Over the past three years the app market has grown exponentially and nowhere is that more acute than in the children's space. The industry has jumped from creating a few cute drawing apps for the iPhone to tens of thousands of apps for children across multiple platforms (Android, Apple, Windows, Amazon) and multiple devices (tablets, phones, laptops). Many of these apps deliver outstanding experiences for children and organizations like the Joan Ganz Cooney Centre, Moms with Apps, The Children's Technology Review and TIFF Kids celebrate the best of the best.<sup>6</sup> Five years after the launch of the App Store, (Arthur, 2013) and kids and parents now expect gameplay to be available on every device they own, and an industry has grown at hyper-speed to support that expectation, with revenue to match.

### Once upon a time...

Given the rapid growth of the kids' app market, highly skilled developers threw themselves into game production, most with no understanding or awareness of the ethical challenges that come with producing for children. How much should children pay to play? Do young children even understand that they are paying for games? Do you need permission from parents - the way you do with most kids' activities - if you're requesting personal information? These, along with the myriad of other questions were not answered, and in most cases, not even asked. And in the wild west of the development world, how would a bunch of 20-somethings with tech skills running a start-up even know to ask the questions in the first place? In this environment it is easy to understand how revenue generation overwhelms every other imperative.

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<sup>6</sup> <http://www.joanganzcooneycenter.org/> <http://momswithapps.com/> <http://childrenstech.com/> [http://media.tiff.net/contents/tiffkids/2013/Take\\_Away\\_readable.pdf](http://media.tiff.net/contents/tiffkids/2013/Take_Away_readable.pdf)

The days of blissful ignorance are drawing to a close. Parents and children snapped up new apps at the outset excited by the possibility of each new toy. Lately a critical perspective has emerged. There is a recognized need among parents for guides on which games or apps are 'good' for children, and such guidelines exist in the form of ad-hoc services including review blogs, app clearinghouses and the top-rated lists in App Stores themselves. However, each of those guides are post-facto, reviewing products after release. Guidelines for developers need to govern all facets of the digital creation process, from design, all the way to appropriate requests for personal information. Among the most pressing requirements is the need for a set of rules around monetization – the way developers make money from those who download their games or apps.

### Mobile Monetization Strategies

Monetization in the app space is a complicated business, especially with respect to children. Much of the marketing served to children in popular apps is wholly inappropriate and anyone familiar with the tightly scripted Broadcast Code for Advertising to Children can't help but be shocked at the current advertising free-for-all. The following is a "playbook" describing current app monetization models, and please note some are similar and could be considered subsets of an overall approach.

Purchase	A game must be purchased or subscribed to in order to play.
Lite/Demo	The game is free to download, but gameplay is limited and users are encouraged to purchase the game after trial.
Paywall	The player must pay before they can have access to certain features.
In-app Purchases	Players can purchase new content, features, unlock levels. These are considered micro-transactions and require real-world money to acquire "virtual goods". This includes both games you purchase and what the industry defines as "Freemium" - where consumers download and play the "core loop" of a game for free, but then pay for virtual goods and currency through individual purchases.
In-game Advertising	This is a broad category which includes: watching ads to acquire points to continue/enhance gameplay, actual advertising for products through ad platforms including Ad Colony or Admob, cross selling other games and apps the company produces, video ads, banner ads, text ads, and ads for mobile platforms.
Offer Wall	Players are confronted at points in the game to connect to other content, download additional apps, fill out a survey or reveal personal information in order to acquire additional points/content, in-game currency, or mobile texts or call minutes, although they can continue to

	play without participating in these offers.
Social Connectivity	Players can connect to social platforms outside the game such as Facebook and Twitter, for which they are rewarded with points and/or where they may be served ads. The content of these ads may be connected to the game or be based on the social platform in use. Social networking integration uses children and their social connections as marketing tools.

Broadly speaking, the challenge is this: how can developers be transparent about their monetization methods for apps - aimed at, or played by children?

### Introducing Ethics into the New Frontier

*"For those kids that spend \$100 in our game, nearly everyone is refunded. We're just a pipeline, the complaint goes to Apple, Apple gives a refund. We get two or three requests for refunds a day saying "My kid spent money." We never want people to buy if it's not intentional."*

**Ontario App Developer**

The ethical challenge of monetizing apps for children spans the entire industry across platforms, age groups and types of games. To date, with some exceptions, the requirement to treat minors in a responsible and age appropriate way appears to be a secondary consideration, with revenue generation leading the way. There are clearly multiple models for monetization of apps, all of them with specific challenges for both developers and consumers. These models are complex, can be staggeringly difficult to uncover and are sometimes hidden until after the app is downloaded or opened.

They can also be linked to in-game behaviour, proficiency, and socialization features built into the game. The methods of monetization are also frequently combined. Whether games are explicitly targeted at children or are simply being played by them, it is challenging for both parents and children to know when, how, or even if they will be asked to pay once the app is launched.

In short, there is very little transparency in many game developer's marketing and monetization strategies, which is a problem when you're targeting kids.

Stories abound these days on children's missteps around in-app purchases. In March, a five year-old child in the UK asked for the password to download a "free" app and was able to download more than \$2500 in add-on purchases on his mother's credit card in a matter of minutes. (Bautista, 2013). There are, of course, parental controls to restrict in-app purchases but many families are unaware of them, and children often don't know that purchasing darts and weapons for their Zombies vs. Ninjas game can cost up to \$99.99 in real money. Note: The most recent Apple Update (March 22, 2013) includes an addendum to the price in the App Store, clearly letting players know that the game they are about to download offers in-app purchases.

A parent forwarded this correspondence to the kidsmediacentre:

**Dear Apple:**

*The most recent credit card statement for the card I have on file with the iTunes Store shows iTunes transactions I am unfamiliar with and which are not reflected in my iTunes purchase history as I see it on line. Specifically, see Jan 16 \$5.63, Jan 30 \$11.24, Feb 1 \$11.24, Feb 4 \$18.03 & \$12.38, & Feb 9 \$13.54. Please advise.*

**Dear Apple:**

*After having done some research I discovered that all of these charges are what are referred to as "in app" purchases from free games my 6 year old plays on my wife's iPad (Apple IDxxxxxxx). All of these charges are unlawful as none of them required anyone (adult or child) to enter our Apple ID password, which my 6 yr old does not have. A 6 year old does not have the capacity to enter into a lawful contract online. It is disgraceful that Apple would let App developers bury these hidden fees within games targeted at children and not require a password to incur the charge. Only 1 of the charges is valid, on Feb 2 for \$1.12, I have alerted the credit card company and the card has been cancelled. If these charges are not reversed on my credit card and removed from my wife's iTunes account immediately, I will undertake to file a class action against Apple for its complicity in this deceptive practice.*

**Dear Parent:**

*Thank you for the information.*

*I checked your account and it looks like the purchase "Standard Salary Boost" was purchased from within the application "MLB: Full Deck" on your iPhone, iPad, or iPod touch. This is called an "In-App Purchase". For information on this type of purchase, check out this article:*

*iTunes Store: About In-App Purchases*

*<http://support.apple.com/kb/HT4009>*

*I understand that the purchase of "MLB: Full Deck" was unintentional. In five to seven business days, a credit of 229.85 CAD, plus any applicable taxes, should be posted to the credit card that appears on the receipt for that purchase.*

*Please note that this is a one-time exception, as the iTunes Store Terms and Conditions state that all sales are final.*

Transparency should be one of the core practices for ethical game developers. However, some of the developers we surveyed – particularly app developers - were not aware of its importance, had not considered the ethical challenges of asking children for money,

or felt it wasn't an issue because their games were not explicitly aimed at children.<sup>7</sup> This is reflective of an industry that is relatively young, the age of the developers who are focused on technology not ethics, and an overwhelming need to generate revenue for startup ventures.

The cumulative picture is one of an industry long on creativity but short on ethical awareness. And to repeat, it is a question of awareness. Developers we spoke to were not opposed to guidelines – they simply had never jumped off the game development treadmill long enough to consider they might be required.

For example, developers were largely unaware of American legislation (COPPA) and Canadian regulations regarding minors and the collection and use of their personal information (PIPEDA). Absent a specific regulatory framework (like the broadcasting industry) the landscape for game development in Canada resembles the Wild West with few rules, and fewer sheriffs. Monetization strategies mirror this largely unregulated industry.

## **The Ethics of Using Social Media to Engage and Sell**

Community engagement and social media has taken on a fevered pitch with every developer trying to determine how to incorporate “community” practices in their digital experience. When 1 out of every 7 minutes online is spent on Facebook, 340 million tweets are sent daily and 300 million pictures are uploaded to Facebook every day via Instagram, it's easy to understand why developers want to harness the immense power of social media (Creaotivo, 2012).

Community, in theory, means sharing a digital interaction with a group of other users that one knows either in real life or in the digital space exclusively. According to Jane McGonigal, community or “communitas” is a powerful sense of togetherness, solidarity and social connection protecting against loneliness and isolation (McGonigal, 2011). In a perfect world, gamers care about something together and work towards a shared goal in a shared space.

In our case studies, you'll see many developers who embrace community in a positive ethical fashion including: Bitstrips, Ruby Skye, and Doodlecast.

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<sup>7</sup> These developers were aware that children were playing their games but did not feel they were responsible for this, even though the artwork and gameplay were suited to children.

## The Taxonomy of Community

The flip side of “community” is its power to build brands. Community tools are often used by developers, and indeed the broader marketing world, to attract new audiences. Companies essentially outsource awareness-building to their loyal consumers. Ten years ago we would have called this “word of mouth” or “evangelist” marketing. Today it’s about harnessing the viral capacity of children to build a groundswell of excitement and support behind a brand. App developers are currently doing this in spades.

There are many developers who build safe community tools into children’s media. Picto-chat, controlled or defined word chat, thumbs up/thumbs down, offer children the opportunity to participate in a digital community without having to log in and register on a site. Adding score-save functionality and specifically user-generated content to the community - the child contributes drawings, videos, comics, stories and content, writes in open forums, participates in open-ended chat – all these take *community* to the next level and require IP collection and parental verification (per COPPA).

*“As for links to social media, we don’t think about children when marketing the game through these avenues. We allow users to tweet or post a score, and around 7% of users do that. We have nearly 2 million users and maybe 20-30 tweets a day. There are no pop ups to encourage posting to Facebook. Our niche market doesn’t lend itself to social interactions.”*

**Ontario App Developer**

Social media - Facebook, Twitter, Instagram, for example - arguably the most powerful community and social networking tools, are limited to users 13+.

They are complicated, layered, data rich, highly customizable sites that allow youth and adults to be social and share. The *amount and nature* of personal data shared is generally a function of a user’s cognitive and social/emotional development including their understanding of privacy, digital savvy-ness, comprehension of safety settings, and willingness to enable businesses with their personal data. According to regulatory bodies like the FTC and Canada’s Privacy Act, social networks are most appropriate for individuals 13+ because they require high level, executive function skills and forward

thinking (i.e. consequences of my action) capacity.<sup>8</sup>

That's the theory. In practice, we know children have colonized social media. Children are early adopters of technology and are masters at finding registration loopholes. Children can and do, lie about their birth date or, when asked for parent's e-mail for "verifiable consent", give a second e-mail that is their own. How is a developer to know? Facebook admits it's impossible to restrict younger users from creating a profile. It's estimated 34% of 9 to 12-year-olds in the UK have a profile on the social network. The global estimate for the 9-12 year-old demographic on Facebook is a quarter of all children (Sweeney, 2013).

Obviously there are many risks when children this young use social media. Most adults hemorrhage personal information and struggle with privacy settings; imagine how kids' fare! And while its true parents are ultimately accountable for their children, developers are legally obliged to share the responsibility. Embedding children's apps, websites and games with Facebook or Twitter Connect functionality, adding the "Like" button to a child's digital play space, offering incentives of "bonus" currency for messaging a network are unethical practices. These links dangle a carrot in front of kids. They encourage children to sign up for social media, which requires them to lie. It also leaves them vulnerable to privacy, safety and bullying infractions, since they rarely understand how to lock down their privacy settings. Developing a social media strategy that does not require a child to lie about their age is the responsibility of the developer, not the parent or the child.

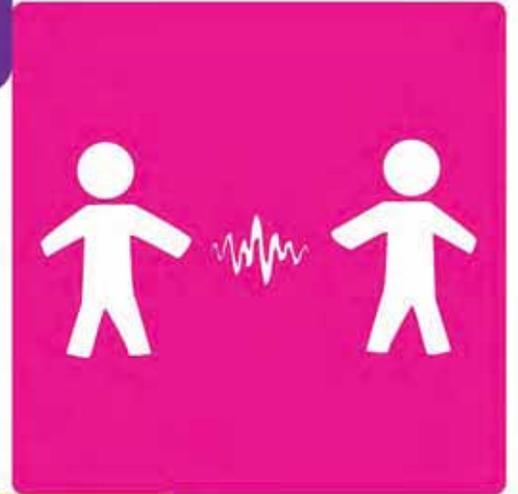
That said, social media, when utilized in an ethical and transparent way, can be a powerful and exciting tool. Children's digital properties with a PARENT section, can offer social media connectivity. Empower *parents* with community functionality; use *parents* as a social driver and consider having *parents* link to YouTube and other social sites. Several developers reported parents and families were helping grow their brands organically, with responsibility shifting to the parents.

If your content is rich and worth passing along, digitally savvy parents will share with their network, allowing you to take the high road. Since in the final analysis it is the *parent's* credit card that holds the charges, this strategy, while challenging, offers the best potential for reward. Case in point is Toca Boca, one of the most powerful brands in the app space, also the most rigorously ethical in its use of social media for marketing.

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<sup>8</sup> According to Wikipedia, the ultimate community site, executive function is an umbrella term for cognitive processes that regulate, control, and manage other cognitive processes, such as planning, working memory, attention, problem solving, verbal reasoning, inhibition, mental flexibility, task switching, and initiation and monitoring of actions.

Ontario property Ruby Skye P.I., a web-series for tweens and teens, provides viewers with the option to share content across many social media platforms. It also educates users on safe social media practices. The site does not manipulate viewers into unlocking special content if they tweet about the web series or *Like* it on Facebook – it simply gives fans of the series the option to share the episodes with their contacts via social media sites.



# DEFINING BEST PRACTICES IN THE KIDS' SPACE

## DEFINING BEST PRACTICES IN THE KIDS' SPACE

It's easy for developers today to get excited about the possibilities that exist in the emerging digital space. Seismic shifts in web connectivity and the depth of customer intelligence (aka BIG data) brings a new science and discipline to digital marketing. The success of Angry Birds, Fruit Ninja, Club Penguin and all these years later - even Webkinz, gives interactive publishers everywhere hope, excitement and a reason to dream. Add to the mix community-building campaigns and the virality of social media channels like Facebook, YouTube, Twitter and Instagram and the potential to build a fan base and engage young audiences is hugely tempting.

The problem is that children are a special-needs audience and maximizing the ROI value of a child by tracking and serving them advertising based on behavioural profiling is inappropriate. Most children – and plenty of adults - are unaware of the cookie-based identifiers and data collection practices that track and extract (pull vs. push advertising) algorithmically enhanced, digital profiles. Appropriately, today, most leading ad networks don't allow marketers to buy underage audiences because it's understood children can't discern "retargeted" advertising and that these techniques take advantage of their limited developmental capacity.

Similarly, embedding links to social networks in children's digital experiences and then encouraging them to broadcast their achievements to a network of "friends" presents risk. Locking down privacy on sites like Facebook, Tumblr and Twitter requires, first-off, an understanding and appreciation of the concept of privacy, and secondly, the aptitude to manipulate the matrix of settings. Many of the social media streams in today's marketing toolbox are public by "default" – a concept requiring a higher level of privacy literacy that many parents don't have. Social networks in North America typically have 13+ age restrictions because they carry a risk to children's privacy, risk to children's safety and a risk to the developer's reputation and brand.

Some of the developers we interviewed were very conscious of this risk and highly attuned to the responsibilities of being a children's content developer. Companies who have built digital brands with strong reputations – like Sinking Ship Entertainment and zinc Roe (renamed Sago Sago) – spoke of the weighty internal debates and ethical discussions that go hand in hand with being a children's producer. One developer spoke of using his 3-year-old son as his own litmus test in the development and marketing of his apps. Would he want his son playing this app? How would parents rate the safety of the experience? How would they assess the learning opportunities and curriculum components?

## What are Best Practices?

As a media college committed to interactive digital media, game design and children's entertainment education, we support and see great value in children's digital entertainment. We encourage entrepreneurship, experimentation and incubation and many of our graduates are gainfully employed in the industry. We believe drawing hard lines in the sand in this rapidly changing digital ecosystem is futile. Technology that had parents up in arms just five years ago has become a cultural norm (think: Facebook). At the same time, there needs to be a principled approach to protecting children's rights – and parent's needs - in the digital space. Best Practices are not a set of rules, but an ethos. Here's how we define them:

*Corporate best practices respect children's special status and families' needs to raise children, not consumers. Best Practices applied in the children's digital industry are a reflection of a company's understanding and appreciation of child development, privacy law, and their own ethical principles and good values. Best practices embrace the concept of accountability and spring from an open and transparent culture.*

Best Practices reflect the fact there are many things children are not allowed to do because of their limited capacity - entering into contracts, for instance, or joining social networks. A six year old is simply not capable of weighing all of the factors and making an informed decision. They do not have a sufficient sense of the future to consider consequences. To target children as an audience demands that all marketing activities take into account these facts and that developers no longer claim ignorance of the age or identity of the person behind the credit card number.

When we asked developers what best practices in the children's space meant to them, most agreed it covered a lot of ground, but inevitably returned to their own company ethos and moral compass.

## Best Practices Toolbox

There are several concrete steps publishers can take to implement a *child-first* design ethos in their work and development. The following set of recommendations is a distillation of the best practices we observed in our research and interviews with Ontario developers. They come to us from the many studios we found who incorporate children's development and ethical considerations into every step of the product cycle.

## **BEST PRACTICE # 1: Communicate your Brand Values.**

**Current Status:** *Very few children's content producers have a brand vision statement as part of their brand communication.*

Most successful companies and brands have a mission statement, brand vision or brand essence statement. Call it what you want, it's a "stake in the ground" commitment that you, as a company, are making to your audience and to yourselves. Your brand promise is your company's promise, your beliefs and values on display. Who you are as a company and what you believe affects every decision you make, from game design to monetization. It translates to a set of perceptions in the minds of consumers that over time add up to something that is hopefully positive.

Many developers we met were wary of the branding and marketing end of the business and indeed didn't think of themselves as a brand at all. They just like making games. But the moment you become successful, the moment you reach "critical mass" you become a brand. Parents and children may only know the name of your game to start, but they come back to what you create because of what your brand stands for.

That's why it's so important to have a philosophy, commitment and brand vision if you're creating digital products for children. It should be your brand's guiding light and the benchmark against which you weigh all development and marketing decisions. Parents and children want to know that you have a belief system and a moral compass; that you have a dream or a vision for your brand. You may be passionate about arcade style games, the educational value of apps, the interactive potential of eBooks or just about helping kids be the best they can be. Sharing your personal story, vision or your attitude towards kids and media is a good place to start.

### **Recommendations:**

- Post your brand value statement on your website/app/somewhere in your brand's marketing communications in a clear fashion for your audience to see. Visits to the page may be minimal. But over time, if you live and breathe this best practice, your consumers will come to appreciate you as a brand with integrity - an important asset in the "children's market". Just ask the good folks at Disney or Sesame Street. As you develop your brand statement, reflect on how this will impact your design and marketing strategy. If aspects of each reflect poorly on your brand, then change them to fit the over-arching goal.

## Consider some public service messaging...

- Do you have a position on children and exercise? Many parents struggle with managing children's screen time and long hours of sedentary behaviour. What is your brand position on this issue?
- Think about being proactive and encourage children to take a break from your product. Think about sharing some statistics to help make your case.
- Explain the 20/20/20 rule. (Heiting, 2013) After **20** minutes online, look away for **20** seconds at a distance of **20** feet away. It helps reduce the likelihood of myopia, a progressive form of nearsightedness, which is becoming increasingly common in young children.<sup>9</sup>

Children love knowledge. They like feeling smart and they'll appreciate that you care.

### Some examples:

The teen web series Ruby Skye P.I. reaches out to educators and the show covers relevant youth and issues such as Internet scams, water bottle pollution and youth politics that are changing the world:

*"I am trying to give kids the quality I am not seeing on TV: different body shapes and girls who are independent-minded, technically astute and solve their own problems. It's also important to give kids the tools to negotiate digital spaces, which we do in episodes like Spam Scam. Our web series is not confined to 22 minutes of airtime. Viewers can expand and comment on everything we do."*

**Jill Golick, Creator of Ruby Skye P.I.**

Blair Powers, co-creator of Dino Dan, spoke to us about how careful his company is when creating digital extensions of their series. He's also a firm believer that educational content only serves to enhance the entertainment value of their brand:

*It's important to be true to your audience and authentic to your brand. That's why we had museums on board from the beginning. Everything kids are learning is real. Why can't facts about dinosaurs be just as interesting as having talking cartoon dinosaurs that are not based on any facts at all?"*

**Blair Powers, Owner, Sinking Ship Entertainment**

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<sup>9</sup> It is believed that myopia is caused by 'near work' – sitting too close to a computer screen or holding a book too closely. Myopia in children is a growing concern because of the increasing prevalence of nearsightedness in recent decades. In the United States, myopia affected about 25 percent of the population in the 1970s. Today, more than 40 percent of Americans are nearsighted.

## BEST PRACTICE # 2: Audience Transparency. Who are you really targeting?

**Current Status:** *Some developers make it clear they're targeting children with their website or app. Others, not so much!*

Corporate social responsibility principles suggest that as a content creator you have a moral and ethical responsibility to be open, honest and transparent in your brand marketing efforts if your audience is children. While every child has a different social, emotional and intellectual trajectory, developmentally, research suggests children under the age of 13 may not have:

- the intellectual capacity to delay gratification; or
- the patience, capacity or deep investigational ability to determine the consequences of their decision making inside a game or web experience. (Mischel, Shoda, & Peake, 1988).

Many website developers in the general children's space post a 13+ age requirement in their Terms of Service **when they know their content is attracting children under 13**. Many publishers would prefer to avoid the administrative responsibility that goes along with securing verifiable parental consent (per COPPA). Further, they'd like to sidestep the financial responsibility of providing the community oversight/moderation that goes along with the acknowledgement of an under 13 audience. Granted, obtaining consent and oversight of comment streams – either electronically, with live moderators, or both – is a time-consuming and expensive exercise. But these principles and practices exist to keep children safe and are based on the ethical protection of children's information.

Other implications? Declaring an under 13 audience also rules out potential advertising revenue streams from advertising networks (Google AdSense, Amazon) that serve contextual and behavioural advertising on a client site. Ad networks, as a rule, don't participate in under 13 web sites (although they do serve ads on iOS and Android devices). If developers are more concerned with monetization than safety, the easy way out is to simply post a 13+ age policy and then avoid the responsibility of consent and community management.

A child who is under the age of 13 could also be excluded from participating in *registered*, "community" based gameplay due to COPPA guidelines (website and online service operators must secure verifiable parental consent). Children who value the social component of gaming will, more often than not, do what's required in order to register and take advantage of community functionality.

## Lying to get online

It's no secret children have become extremely proficient at getting around age-related filters. They learn very quickly how to skirt these policies (i.e. they lie about their age and "self-approve" consent). Participating in social spaces or contributing to community experiences – like leaderboards, chat, posting a comment - is a very important part of the digital experience for children. Indeed, social networking behaviour starts with virtual worlds where children game, socialize and contribute their own content. By grade 5 or 6, many have migrated to 13+ social networks. In the U.S., (Minor Monitor, 2012) it's estimated that 38% of children on Facebook are under 13 years of age and in the UK its 43% (Clarke B. , 2012).

For developers or publishers struggling with the concept of audience definition, The Children's Advertising Review Unit (CARU) in the U.S. uses the "reasonable expectation" clause as a measuring stick. If there is a *reasonable expectation* that children under the age of 13 are visiting your website - or playing your app - CARU argues you have the moral, ethical and legal responsibility to protect children's privacy.

COPPA has similar language for developers of digital content. COPPA claims if "ANY operator" of a website or online service has **actual** knowledge that it is collecting, using or disclosing (i.e. analytics, ad serving) personal information from children interacting with their site, they have a responsibility to obtain verifiable consent. A recent violation occurred when fan sites for Justin Bieber and other pop sensations asked for the e-mail, street address and cell phone numbers of 101,000 children under 12 years of age without securing permission from their parents. COPPA found them in violation of children's privacy protection law (Singer, Fan Sites for Pop Stars Settle Children's Privacy Charges, 2012).

Similarly, if you have an app that uses child friendly animation and the App Store age rating is "4+" or "**Everyone**" on Google Play, you need to take the high ground and consider the "reasonable expectation" clause. Both the App Store and Google Play offer a "also recommended" or "people who downloaded this app also bought" feature which developers told us further identifies their product's user base (some developers claim they don't know who is using their product because Apple doesn't share user analytics).

If your site or app is populated with advertising vehicles that are either inappropriate for a child audience or allow the capture and collection of children's personal information, or you are using third party analytical tools (IP capture) to serve advertising and/or build audience profiles, Canadian and U.S. laws hold you accountable. Indeed, they'll hold you even MORE accountable after July 1, 2013 when persistent identifiers such as IP addresses are added to the list of COPPA violations (Federal Trade Commission, 2012).

According to James Kosa, Information Technology and Intellectual Property lawyer at Deeth Williams Wall, once you know your audience, you have to act. The law compels you. Willful blindness or turning a blind eye is not a legal defense.

Apple's **also recommended** feature: Users of the popular app Super Snack Time also bought or downloaded Cats Away, Twang The Fox and Feed Garfield. This alerts creators of Super Snack Time that despite the warnings of fantasy violence in their app – young children are using their product.

### Recommendations:

- Use a neutral age screening mechanism to try to secure an accurate response from a child rather than stating, “you must be 13 to register”.
- Consider honesty and transparency and encourage parents to provide oversight around the sites their children visit.
- Familiarize yourself with the amended version of COPPA (page 20 - 24). If you are unsure if your online property triggers COPPA or how to secure COPPA compliance, you can contact a lawyer or any of the Safe Harbor organizations profiled in this document (pages 148 – 151) to help assess your organization’s current level of privacy and child safety. The revised COPPA rule is complex, and there are many types of verifiable parental consent (VPC), each aligning with
  - the level of community interaction in your interactive experience
  - the level of moderation and PII being collected, used and disclosed
  - the designation of your site/experience as child-directed or “mixed audience”, i.e. stated audience is 10 – 17; developer will need to install “age gate” or neutral age-screen to ensure 10 – 12 year-old audience receives verifiable parent consent or limited access to certain features (COPPA says child cannot be blocked from all services given this encourages them to lie, and increases the safety risk)

The FTC is offering prosecutorial *discretion* for a period after July 1, 2013 as children’s developers attempt to assess risk and ensure compliance. They’re also advising prosecutorial *action* will be taken if companies are in violation of the Rule.

- In your privacy policy or website, share your audience strategy and how you plan to keep your audience safe while they interact with your brand.

The kidsmediacentre interviewed developers Shahan Panth and Jacob Blackstock of Bitstrips (Case Study Pages 85 - 86) to better understand how they manage age verification on their “mixed audience” site. The site targets users 13+, but the comic strip’s popularity with kids meant they had to acknowledge and protect children under 13 years of age:

“We don’t market Bitstrips.com to kids. More generally, it’s because we don’t market Bitstrips.com. It’s a totally word of mouth website. A lot of that is because we have our educational website licensed to many schools and kids are finding the site organically.

So, facing that reality, we changed the sign up process to be COPPA compliant, and in doing that, the sign up process, you are prompted to create a user name and select your age. And if you choose anything under thirteen, the prompt for your e-mail address changes to your parent’s e-mail address, and you have to enter your parent’s e-mail. And then you complete the sign up process, and you can start making comics, but you can’t publish anything.

What has to happen is, in signing up, the parent receives an e-mail to activate their child’s account. It says “hey, your child has created an account on this website, this is what Bitstrips is, click this link to activate this account. If you don’t click this link in the next 72 hours, we’ll automatically delete your child’s account.”

And this all comes down to the idea of verifiable parental consent, which is the pillar of COPPA. They also have the option of deleting the child’s account. If they click through and they activate the account, they’ll see that they have their own moderation controls page that’s only accessible to them through that e-mail.

That dashboard comes through that activation link. After they click the activation link, they’re further prompted to activate or delete, so there’s a double opt in. And then that moderation page appears. It’s selected so that your kid can publish comics, but all the other settings are disabled unless you manually enable them, and they include accepting and sending friend requests, viewing and making comments, using our chat function.

All of those are turned off by default, and the rational really is that we want to make sure parents explicitly opt into a medium where kids might be exchanging personally identifiable information, which they shouldn’t do, but we’re making sure that parents have explicitly made that decision before it’s active on the site. And then, they further have the option of deleting their kid’s account at any time from that page. And kids can only get to that page if they’re in their parent’s inbox.”

### **BEST PRACTICE #3. Is your user experience age appropriate? What life and literacy benefits does your experience provide for children?**

**Current Status:** *Very few sites indicate the learning benefits of their digital experience.*

Responsible children’s developers are quick to acknowledge children’s special developmental *and* developing needs. Most of the children’s content creators we met saw the interactive – and specifically the mobile space - as a tremendous opportunity to contribute to children’s learning. Others had not considered it; acknowledging their motivation to develop a children’s property was mostly spurred on by the opportunity to create an experience that was “fun”.

A child’s job is to learn how to learn. Consider tapping into this insight. How does your digital experience engage children? Is there an opportunity to provide meaningful learning? Are soft life skills like friendship, perseverance, personal growth, teamwork, and good citizenship embedded in the core experience? Perhaps there’s the possibility of more formal skill building: math, language, financial literacy, science or media literacy. What educational benefits are in your gameplay or digital experience?

We’re not suggesting all kids’ digital experiences incorporate hard curriculum. The reality is children learn through everything they do. Toca Boca Hair Salon is currently the **#1 educational** app on the iPhone and iPad. It’s pure fun and pure imagination. Its creative process allows children to explore their inner artist, hone their appreciation of colours, improve hand eye coordination and escape into imaginative play.

In order to create the best possible product, take time to decide or do user testing in order to discover how children are using and learning from your product. Something is learned from even the most lighthearted experience, understanding what that is, puts you in a stronger position as both a developer and marketer.

Jean Piaget taught us that children learn through play – and we now know that play has moved beyond the playground and classroom, into the digital world.

#### **Recommendations:**

Start by isolating your audience and understanding their specific age appropriate needs (see Infographic #3: Child Development Milestones, page 137-141). The key milestones in a child’s development provide developers with tremendous interactive potential. Here are some learning benefits and links to education that we discovered when we surveyed Ontario properties. Consider these examples as recommendations on how to execute educational benefits:

- A Lotta Dessert (TVOkids.com) is an online mini-game where children are asked to repeat patterns by layering fruits, granola and yogurt. This game not only teaches basic patterning skills – it also encourages healthy after-school snacks. In the parent section of the TVO website, parents are introduced to the game’s educational benefits with suggestions on how to take advantage of the skills being taught.
- iLearnWith, a series of educational apps developed by experts in early childhood education, teaches children math, language skills and more. This app is designed for children between 3-6 years of age. The app takes advantage of the intuitive nature of a touch screen device to capture this young demographics’ attention and teach them important skills.
- Skatoony, the online quiz show and companion to the Teletoon TV show, teaches basic trivia and curriculum by asking children skill-testing questions. The game increases in difficulty based on the child’s skill level. For example, when a player correctly answers three math questions in a row, the game’s semantic programming knows to step up the game and begins to ask the player intermediate math questions.

*"We have algorithms that try to match up players. You want more experienced players to play with other experienced players, and group new players together so they have a chance to grow."*

**Johnny Kalangis, Creative Director, marblemedia**

- The web series, Ruby Skye P.I. is loaded with media, digital and life literacy curriculum. The site offers a safe environment for tweens and young teens exploring social media connectivity. Ruby Skye links to safe and age-appropriate websites and educates users on how to use social media responsibly with suggestions on the kinds of comments that are acceptable and unacceptable. Importantly, the voice, tonality and ethical underpinnings of this website and web series is respectful to its youth audience, an important benefit to the “me to we” generation.

Developers have a tremendous opportunity to influence young consumers in a positive way. Properties that strive to educate and understand the learning needs of their audience have longevity. Parents and children trust brands and experiences that have their best interests at heart, and once you have secured parent’s trust, the brand building potential increases significantly.

## **BEST PRACTICE #4: Are you acknowledging the ultimate gatekeeper: the parent? Provide plenty of opt-in points for parents and make it a key communication channel for your brand.**

**Current Status:** *Many sites have NO parent communication or bury it in privacy policies with the rest of the often-tortuous legalese.*

If you are publishing digital content for children it's important to acknowledge the role of the parent in the child's digital experience.

Gen Y parents were the first generation to grow up with technology and research indicates they're playing a larger role in their children's digital life than the boomers did with the "television generation". Parents oversee their child's digital engagement based on the age and stage of a child's development (Parenting and Social Media Survey, 2012). At the younger end of the age spectrum – preschool and primary grades – parents spend significantly more time researching websites and apps and helping their children navigate digital experiences. By eight years of age, the kidsmediacentre research shows parents "pull back".

Whatever the child's age, providing privacy, safety reassurance and parental mediation features is important to involved, digitally savvy parents. Parental monitoring tools like a dashboard or parent account is an important best practice and a key competitive advantage for a company.

The surge in popularity of mobile technology for kids offers increasing "smarts" and functionality (i.e. GPS tracking, IM, video chat) and families are providing these technologies to their children at younger and younger ages. At the same time, parents want to know what their children are doing online. As digital natives, these parents are increasingly using third party parental controls and the restriction settings on their mobile devices.

Educating parents on the inspiration and objectives of your game, app or website creates an important dialogue and helps make the experience intergenerational. It also feeds their desire to provide a safe and entertaining experience for their children.

### **Recommendations:**

- **Set up a parent's section in your navigation bar.** Make sure any important usage tips are isolated in this section. Many websites we looked at fold parent's information into the privacy policy, which likely sees very few eyeballs. For us, that approach diminishes the role and importance of parents and feels slightly disingenuous.

- **Summarize Content For Parents:** This could be as simple as a paragraph or page that describes to the parent what the digital experience entails. Many parents are using digital media with their children and need to understand how to use the site for maximum fun and learning. Incorporating instructions that are clear and visual (i.e. show examples, use videos) can help both the child and parent have a more enjoyable game experience.
- **Share your Community Guidelines and Moderation:** Parents should be informed of how the game or website is monitored by the developer or broadcaster. Whether in the form of usage tips, flags for inappropriate conduct, walkthroughs, gameplay assistance and forums, reviews, suggestions and feedback, your policy should be clearly stated. If your **community management policy** is that you don't monitor children's comments or participation, that information **should be highlighted vs. hidden**. Parents can then make an informed decision about their child's participation on your site.
- **Consider a parent facing tracking mechanism or dashboard on your website that lets parents see how a child is using your site.** The best dashboards allow parents to program levels of chat, see friends' lists, achievements, and more. Some even allow parents to communicate with their children. It may also offer statistics on how the child is using the property and provide parents with additional and relevant parenting or child development information.
  - Happy Studios, for example, is a virtual "advergaming"<sup>10</sup> world created by Ontario developer Fuel Studios for McDonalds. It promotes their brand and, recognizing the heightened need for accountability, offers parents a detailed 'grown up' section where they can monitor the learning activities their child has participated in on the site.
  - Animal Jam – National Geographic's virtual world run out of the U.S. – also has an example of a best practice dashboard, allowing parents to see their child's interaction on the site (Animal Jam).
- **Privacy Policy Statements:** This is usually a small link at the bottom of a website page, written in legal and hard-to-understand jargon. Because the policy is on a website targeted to children – an audience for whom safety considerations are paramount - this information should be easy to find, read and navigate.
- **Prompts Child to ask Parent for Permission:** A site or app may want to remind a child that they must ask their parent for permission at various points when playing a digital game. For example, if there is an option to make an in-app

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<sup>10</sup>Advergaming is when a company creates a branded gaming experience designed to sell a product. Advertisers try to make the experience seamless – although some would argue surreptitious – so the site feels more like fun than advertising. Research suggests children's recognition of the commercial intent of advergaming is low <http://bit.ly/ZiOmja>

purchase, a dialogue box can say "Do you have your parent's permission to enter this Apple ID password?" Or if the site directs a child to social media, ask a child: "Have you asked your parents for permission to use Facebook?" This interactivity gives the child some ownership while acknowledging the role of parents. It also alerts them to the fact that they are doing something that requires supervision.

- **No Outside Influence** – Parents with young children want to know that the experience is contained in the game with no external links through advertising required to continue the game experience. This is an important safety consideration for the child and the parent. Ultimately, parents want to know their child is in a walled garden and not surfing the Internet. If your site does link out, it should be noted in the parent and a safety and supervisory consideration.

## Apps

- If your app offers in-app purchases **let parents know they can turn off in-app purchases in the restrictions setting of the iDevice**. It's way too easy for children to "rack up" in-app purchases without realizing they are spending *real* money on their parent's *real* credit card (see page 42).
- If your app's monetization policy includes advertising walls or "view videos for points", an honest and transparent relationship with your audience should include highlighting this information to parents. Then parents can make an informed decision around their child's interaction with your app.
- **Google Play and App Store Information Page:** When a developer is creating their promotional copy for the App Store to convince children and parents to download or buy their app, they can also include specific age recommendations, reviews and details on gameplay and experience.

## Finally...

- Consider intergenerational gameplay features that support collaboration between children and adults. The Joan Ganz Cooney Center studied intergenerational gameplay between parents and children and found that when the content, format and structure are designed in targeted and appropriate ways, games can unite the generations and provide educational opportunities for parents and children (Takeuchi & Stevens, 2011).

*"What children learn and do with media depends a lot on the content of the media, but they depend perhaps as much on the context in which they are used or viewed, and with whom they are used or viewed. A focus on joint media engagement—on what people do together with media—highlights a different approach both to research and to design."*

**The New Co-viewing, Joan Ganz Cooney Center**

## **BEST PRACTICE #5: Offer a kid-friendly, easy to read, easy to find, privacy policy for children.**

**Current Status:** *Many privacy policies are small links at the bottom of a web page. They are written in legalese and speak over the heads of kids (and adults). Many apps don't offer privacy policies at all.*

Children are being introduced to digital literacy and concepts like corporate social responsibility at very young ages as part of their educational curriculum. They are learning to deconstruct and construct digital experiences and can appreciate websites that have their best interests at heart.

Many privacy policies our team looked at are legal mumble jumble, and kids likely don't have a clue about their importance or what they mean. They recognize early on that this information exists to protect the developer, not them. Children want to be smart and literate about the sites they visit. Most digitally literate children want to understand what a cookie is and how to avoid being spammed. As digital natives, they deserve language they can understand so they can play an active role in safeguarding their own personal information.

### **Recommendations:**

- As easy as it is to find an open source “legalese” privacy policy through Google search, it may not always be the best example of a developer’s responsibility to their audience. It is a best practice to be aware of the laws involved in creating a safe and meaningful environment for youth. If you aren’t, hire a lawyer who is.
- It’s not difficult to create a privacy policy that is unique to your needs, and speaks to your youth audience in plain English. An individual privacy policy also shows investment in and respect for your audience; you are creating the document for them, not for COPPA or PIPEDA. Speaking directly to children, or to the person who provides verifiable consent, will help you stand out as an ethical developer. On top of creating an easy to read, relevant privacy policy, it is crucial that your privacy policy be easy to find.
- Consider creating a TOS and privacy video for your site. Include watching the video as part of a sign-up service. Create a compelling and short video that explains to users who will not read boilerplate – this includes parents – exactly how your site is using information and protecting its audience.

*The link to the privacy notice must be clear and prominent. Operators may want to use a larger font size or a different color type on a contrasting background to make it stand out. A link in small print at the bottom of the page -- or a link that is indistinguishable from other links on your site -- is not considered clear and prominent.*

**Children's Online Privacy Protection Act (COPPA)**

- Consider a Safe Harbor Seal (see Exhibit #2: Safe Harbor Providers, page 146) to help you address COPPA compliance if you feel overwhelmed by implementing verifiable consent on your site. These organizations are approved by the FTC in the U.S. and can help steer you through the process.

## **BEST PRACTICE #6: Post your brand's Digital Citizenship expectations.**

**Current Status:** *Several Ontario developers and broadcasters have clear guidelines and expectations; others have none.*

Participating in online communities, virtual worlds and social games is an increasingly important part of children's social life. Social games and Virtual Worlds like Minecraft, Club Penguin, Whyville, Animal Jam, Moshi Monsters and Webkinz promote deep engagement, player creativity and collaboration. Interactivity features are often basic and controlled for the youngest children. By the "tween" years, the depth and number of community features increases and youth migrate to console games, mobile, YouTube, fan sites and virtual worlds that allow increased levels of interaction. This comes through participation in creative content, fan fiction, forums, chat, blogs, social networking sites and more.

If your children's website or app encourages creative contributions and community interaction on the site or on adjacent platforms like YouTube or Twitter, be clear about the rules of engagement. How do you want minors behaving on your site? What features will you add to ensure players have fun and learn safely? In Best Practice #1, we recommended developers create a brand value statement that speaks to your ethics and experience philosophy. As a separate heading, be sure to clearly articulate your thoughts around digital citizenship including community values and bullying.

Too many children (and adults) believe the Internet is an anonymous space and don't think twice about badgering, venting and bullying using a fake name or hiding behind an avatar or gamer tag. Comment streams and forums embolden those least equipped with "executive function" filters and it's easy to hide behind the perceived anonymity of the web.

As is so often the case, these trolling and bullying behaviours have the potential to do serious harm to a child's self-esteem and too often, headlines carry the news of another child victim of cyber-bullying.

How you police your online community says a great deal about your corporate ethics and priorities. Many companies don't want the responsibility of community management. Children's digital playgrounds require constant care. Supervision is expensive. It requires behind-the-scenes moderators to manage the engagement, monitor chat and safeguard the action. It's concerning how many children's media companies don't provide community management (generally noted in their privacy policy).

Joi Podgorney, community manager of National Geographic's Animal Jam (<http://www.animaljam.com/rules>) says her moderators spend countless hours online

counseling children who are upset with the gameplay, have been tricked by another player into handing over their password or want to report another player's inappropriate behaviour. Children – as we've said before – are a special-needs audience with BIG emotional and supervisory needs. *Community* functionality requires *community* management and it's not for the faint of heart.

### **Recommendations:**

Several Ontario developers have taken community management to heart and do an outstanding job of running healthy online communities. The most engaging communities provide clear benchmarks and definitions around appropriate behaviour. Here are some examples:

**Animal Jam Rules** – Animal Jam is U.S. based but they offer the gold standard in community management and child friendly rules and regulations:

**Play nice!**

You don't like it when people are mean to you, so don't be mean to others.

**Use kind words!**

Animal Jam does not tolerate any bullying, inappropriate, hateful or bad language.

**Do not engage in unsafe or inappropriate gameplay!**

Animal Jam does not tolerate activities involving inappropriate relationships and themed parties.

**Do not ask for or give personal info to others!**

This can mean your full name, phone number, home address, e-mail address, school name, or your username and password to Animal Jam or any other site.

\*Redemption codes that award Animal Jam memberships also count as personal info and should NOT be shared in-game.\*

**Cheaters never prosper!**

This includes scamming players for gems or not being honest in a trade. And using cheat codes or any other additional program other than what Animal Jam provides could break our game and ruin everyone's fun.

**Report and log off!**

If someone makes you feel bad or uncomfortable, you have the right to report them. There are in-game tools to help you block and report troublesome players. And be sure to tell your mom, dad, or a trusted grown up. Remember: it is OK to protect yourself!

## **Bitstrips**

“Before you can comment, no matter what your age on the website, you have to read - they’re very brief - but you have to read and accept our community guidelines that remind you of what we define as acceptable behaviour ([http://www.bitstrips.com/community\\_guidelines/](http://www.bitstrips.com/community_guidelines/)).

It’s not written in legalese, but very plain language and kind of shames you, if necessary into being a decent person and agreeing to that. When we see flagged comments, or rude comments, we delete them, so as administrators we have the ability to just ‘x’ them out. That person is not able to comment for a day, and then if we delete a comment a second time, which chances are, we don’t even know if we’re doing it a first or second time, we’re just deleting an inappropriate comment, and then they’re banned from the site automatically. So we receive a lot of e-mails from people who have been banned asking for forgiveness. They’re usually hard-core users who love Bitstrips and unfortunately we don’t bend to that. You can’t misbehave or be abusive or offensive to people. We give you a second chance by giving you that warning. If you make a really offensive comic that someone complains about and we delete, chances are you’ll be banned from the get-go and we block your IP address.”

**Shahan Panth, Bitstrips**

## **BEST PRACTICE # 7: Be transparent in your Monetization disclosure. You have a right to make money; but you need to approach revenue generation ethically.**

**Current Status:** *Most Ontario developers are respectful of children and parents in their monetization strategies. App developers are still finding their way.*

As an ethical developer, we recommend you explain your marketing and monetization model to parents and children in a clear, straightforward manner. While you're at it, explain the concept of "monetization" to the 95% of the population who don't work in the tech industry and may not be familiar with this term. Involve parents in the revenue tradeoff decisions you've made. BE TRANSPARENT. Parents are far more likely to want to pay for a game if you're honest rather than slipping walls of ads or in-app purchases (IAP) into a children's game.

While "Freemium" and in-app purchases may seem like a model that's been around forever, our research with parents indicates there is a sizeable parent population that is unaware of in-app purchases and the IAP/Free-to-Play revenue model. There is also a significant population of parents who are unaware that developers trade off advertising for free content. They don't necessarily understand all the strings - third party ads, cross-promotions, IAPs, lite version - that are attached to a "free" app.

While advertising has been a part of the children's media and broadcast landscape for many years, there are hard policies and rules to govern the content and scale of this advertising. For example, the Canadian Code of Advertising Standards contains some 25 provisions on what a marketer can and can't say about their product (see Exhibit #3: Canada's Broadcast Code for Advertising to Children, page 152). Advertisers must also comply with the Quebec advertising laws, which don't allow any broadcast advertising to children under 13, and the Ontario laws that severely curtail advertising minutes per 30 minute programming block. If parents are allowing their kids to watch children's TV they assume the broadcaster is going to comply with the code.

The rules that apply to traditional advertising to kids are non-existent in the app space. The app space in Canada is currently a free-for-all with few child-specific regulations

*"Advertising that is directed to children must not exploit their credulity, lack of experience or their sense of loyalty, and must not present information or illustrations that might result in their physical, emotional or moral harm."*

**The Canadian Code of Advertising Standards**

governing financial appeals to children (i.e. in-game purchase of eagles for Angry Birds, Cut the Rope, Mega Jump) and exposure to advertising. While most in-app ads cross-sell other apps, some ad networks like Google's Admob open the doors to general advertising, much of it inappropriate for kids.

Embedding ads in a child's game – i.e. selling their eyeballs to advertisers - is not only aggravating for parents but also unethical, particularly when kids don't know what they are clicking on. Developmentally, children are driven to succeed and may not weigh the risk associated with clicks and ad views. Some ad networks take children outside of the walled garden of the app to web pages that feature paid or inappropriate content for children.

While many apps focus on contra (ads for other games), the number and nature of ads and videos required to advance gameplay can be utterly inappropriate for a child audience. There is definitely an ethical deficit for many developers in the app space and too many content creators are treating children like cash cows. Since developers can't seem to self-police, we expect the federal and provincial privacy commissioners will act soon following the current FTC regulatory movement.

#### **Recommendations:**

- **Be proactive. Explain your monetization practices in the "Parent" section of your company's website** You can't make parents read this information but high ground marketing practices enlighten and educate audiences and then let them make their own informed decisions. Talk honestly about your monetization imperative to kids and parents. As a company, you have to pay for development costs and it's unreasonable for consumers to expect your product to be free. Share the various ways you are monetizing your website with your parents and, in turn, tell them to review this as part of a larger financial literacy conversation with their kids.
- **Think about the ethics around IAP in children's games.** Are you going to upset parents and in turn, undermine your company's reputation limiting future app launch opportunities? Many parents see IAP and micro transactions in children's games as exploitive, taking advantage of a vulnerable audience. Research suggests parents would rather start with a lite version and trade up to a paid version as opposed to having someone or something undermine their parenting and encourage their children to buy in-game currency (Moms With Apps, 2011).

In fact, a disgruntled group of parents began a class action suit in 2011 against Apple, regarding highly addictive bait apps for children that seem free, but encourage in-app purchases. Children spent hundreds, sometimes thousands on virtual goods that were charged to a parent's credit card or pay pal account without

their knowledge. Parents made the argument that Apple knowingly sanctioned addictive so-called “Freemium” games to children. The suit was successful and Apple was made to pay out an estimated \$98 million to more than 23 million users (Griffith, 2013). As of March 2013, Apple’s new App Store interface includes mention of in-app purchases being available in F2P games. Some proactive developers (read: ethical and transparent) on both the App Store and Google Play are taking further measures and in the developer copy, advising players that although their game is Free-to-Play, in-app purchases - costing real money - are embedded in the gameplay.

- **Teach parents about restrictions and how to disable in-app purchases.** Some games advise parents to disable in-app purchases on the App Store brand page. The children’s app Tap Zoo, warns parents on their Apple Store page that items within the game can be purchased with real money and that a parent can disable their in-app-purchases. With some apps, a filter now comes up if you plan to download the free game, advising parents to disable IAP.
- If your monetization practices include in-app purchases, **think about what a reasonable price point is for a child.** Many apps in the App Store feature \$99.99 worth of in-game currency. Ask yourself if that is a reasonable price point for a children’s game experience. Then ask the parents at your neighborhood school.
- **As a proactive customer service gesture, suggest parents purchase an iTunes card to limit any possible over-expenditure.** If you offer a paid app (\$0.99) help children and parents understand the business tradeoff between apps that are ad-supported and paid apps that offer no ads.
- **If you plan to feature ads in an app where there is a reasonable expectation that children are downloading and paying, allow an easy opt-out.** Warn parents who may give their kids their old iOS device that there is the potential for them spend tens, hundreds and on occasion thousands of dollars on in-app purchases. Kids using older iOS phones will not have the benefit of a filter asking the child for an Apple ID password. Tell parents. There’s a good chance they’d appreciate knowing this. Similarly iOS 6 does not require an Apple ID password for “free” apps. Also a small fact those parents would no doubt appreciate knowing.
- Serialize your content using a subscription model so parents can sign up once and forget. A serialized app gives parents the satisfaction of knowing their child will have fresh content on a regular basis without surprises about cost. Weighed against the risk of the in-app purchase model subscription services are a no-brainer for families on a budget and will help your company manage projections.

## **BEST PRACTICE #8: Use Social Media Responsibly. Connect with parents; forego children under 13 years of age.**

**Current Status:** *Social media is a powerful tool for developers, but it's unethical to embed social media in child targeted digital experiences. What's worse is developers are incentivizing children and rewarding them with currency and unlocked content if they tweet or share with "friends".*

It's true: lots and lots of children under the age of 13 use Twitter, Instagram, Tumblr and Facebook. Let's just get that acknowledgement out of the way. How has this happened?

- Children are smart and many want what they're not supposed to have
- Age verification processes are far from perfect
- Parents are busy, overwhelmed and occasionally disinterested

That said, any savvy and caring developer familiar with the privacy risks attached to social media knows we don't just throw up our hands and do away with age guidelines. Kids need rules and boundaries. They don't have the developmental capacity to understand the full spectrum of risks associated with having a public persona. The science and "quantum physics" of programming safety settings on most social networks today is daunting, and you don't have to be a rocket scientist to know too much personal information is dangerous.

The "I didn't intend this for children ergo I'm not responsible and it's up to parents to police it" attitude shows a dangerous level of indifference to child safety.

A developer cannot use the excuse that it is up to parents to monitor their children's digital time – especially when they push to social media sites in their digital spaces. It's easy to pass off responsibility while benefitting from social media but this does not serve your product in the long run, and tarnishes your brand image. In fact, when it comes to creating content for young children, you may increase your discoverability by being known as the "one that doesn't push my kid to Facebook".

### **Recommendations:**

- Feature social media links in the Parent section. If a parent wants to link to social media they can sign into their account.
- As a developer, consider whether the user experience is improved by having the ability to share (i.e. parents having the ability to post their child's digital creation to their own profiles like a virtual refrigerator)? Does it add to the experience or is it social media for social media's sake i.e. marketing the brand. If you're going to include social media educate parents on reasons why they might want to share things out. Only then, should social media API widgets be included in the

- interface. Also, be mindful of only incorporating social media networks your audience will actually use. Reddit, for example, is likely not the best fit for a child's property.
- Facebook fan pages should be directed at and written for parents. They have the choice to promote content they like to other parents or engage their children. Best practices put parents in control.
  - Don't put links to social media if your target demographic is under 13 years of age.
  - Don't embed a *Like* link to Facebook if your target demographic is under 13 years of age.
  - Incentivizing children to use social media, i.e. rewarding them with points and in-game currency if they tweet or post to Facebook, is inappropriate.
  - Facebook log-in on a children's site is similarly inappropriate.
  - Social media if used on a site or in a digital property for children over 13, must be used responsibly. For example, a child may choose to share content on their social media networks but the share function should allow them to choose their own language and not pre-write what they will say on their Twitter feed or Facebook wall.
  - As a part of your brand values, consider educating youth on how to be smart and safe with social media. Consider aligning your brand with a recognized Internet safety organization like Common Sense Media ([www.commonsensemedia.org](http://www.commonsensemedia.org)) or Media Smarts (<http://mediasmarts.ca/>). Help them be smart about the depth of personal information they share and to be cautious when chatting online with people they don't know.
  - Protect young users when your digital property offers community and social networking features (children can upload content, write on comment streams, chat, etc.). Ontario developer sites like Bitstrips, Mudpit, Webkinz and Wooz World are virtual worlds where young people can interact with others. Some sites like Webkinz and Mudpit only allow scripted chat, so users have limited options when talking with other online. Wooz World offers open chat but moderates so inappropriate language is filtered (although children do find ways around this). Bitstrips moderates users' content and asks community members to flag inappropriate content.

## **BEST PRACTICE #9: Consider the real-world application and broader ROI potential of your property.**

**Current Status:** *Very few developers tap into the full spectrum of community opportunities associated with their innovation. Maximize the ROI potential of your product or service by equating it with broader opportunities in the community.*

We examined Doodlecast, created by the Toronto-based company zinc Roe (Sago Sago), as an example of how to think and plan creatively when developing a digital brand for children. Doodlecast is a simple drawing application that can be used by any age group – though it is most appealing to younger children. The innovation or “aha” feature of this app is that children speak or read out loud as they draw, and their “doodles”, are recorded. Children are essentially narrating their own drawings that they can then share.

Zinc Roe has maximized the ROI potential of their property by extending Doodlecast into a social learning platform. For example, children can record a project such as drawing a plant, describing the different parts as they go along, or talk through a math equation as they write it on the tablet. That social learning potential allows children to share knowledge with their parents. It’s also attracted an audience of educators eager to import digital learning into the classroom

Bitstrips, also has recognized the potential of their comic-creator in the classroom and has partnered with the Toronto District School Board to promote media literacy. The creators of Bitstrips also discovered that their site had an intergenerational community of comic lovers:

*“The older users wind up with all these younger fans, but they’re also bestowing their comic making wisdom on their younger fans – how to be better authors, giving them tips, teaching them things about general web etiquette, how you should use this site, how you should interact with people on the site. There is a lot of positive interaction between the generations on the site.”*

**Jacob Blackstock, Bitstrips Creative Director and CEO**

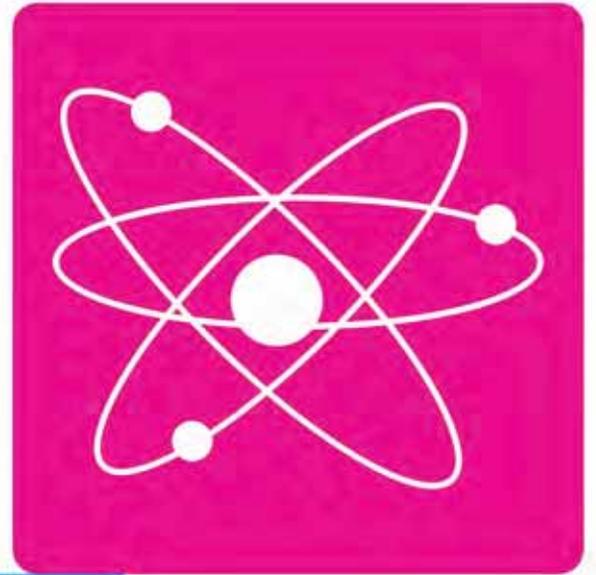
Ruby Skye P.I., the preteen spy web series, reaches out to children as they begin to enter the world of social media and the Internet and teaches them how to navigate the digital space. The series and site discusses issues of monetization and ads – and creates a safe community space to learn, comment and explore these discussions and experiences.

The creators of Dino Dan have partnered with museums to ensure they're delivering accurate paleontology information. In the process, they've attracted a whole new audience of fact-checkers and dinosaur fans.

### **Recommendations:**

- Maximize the potential of your product or service by equating it with broader opportunities in the community. How can a product benefit a child in terms of connecting them to a positive community (real world or online), teaching them basic skills or building their creative mind? Explore ways to connect your property to curriculum or school activities, Boys and Girl's Clubs, Girl Guides, Scouts, etc. Consider what makes your product unique and how that can be made relevant to your audience. Do you have in game currency or achievements? Can you create learning outcomes by using in-game currency to teach financial literacy or budgeting to children? Does your project encourage children to be part of a community? If so, do the moderation systems and community guidelines instill online etiquette and actively encourage digital citizenship with appropriate consequences for bullying?

Connecting games and interactive play to opportunities (ecology, health) and challenges (sedentary behaviour, healthy eating) in the real world is a win for children and a win for the industry.



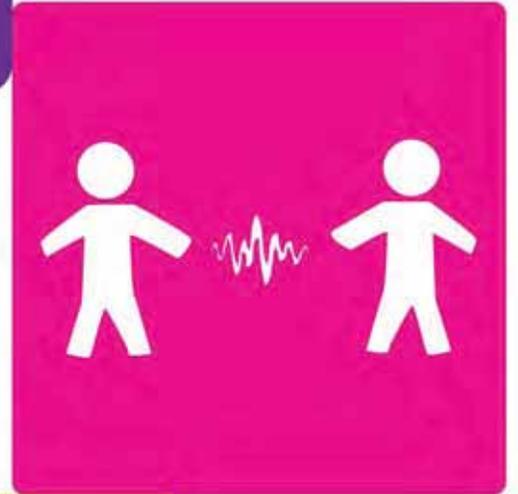
## CONCLUSION

This is an unprecedented time of opportunity for interactive developers. Mobile phones, websites and tablets have unleashed a torrent of creativity by developers and an unrivalled hunger for new digital experiences from kids and parents alike. Like all revolutions (digital or otherwise) a lot more thought and energy has been put into *the how* rather than *the why*. Our ability to produce compelling, engaging, indeed addicting content has raced ahead of our need to slow down and examine the implications of what we are creating.

This best practices document shines a light on the developmental needs and development opportunities in the Ontario children's digital arena. It amasses the rules, guidelines and weighty considerations that go hand in hand with digital development for children. It does so by providing insight into how the cognitive, emotional & social development of children impacts the design process from product development to marketing strategy. It also offers a framework for the ethical treatment of those children in the digital space and provides concrete tools and actions developers can take to ensure their products are compliant and optimized for enjoyment by children and families.

Producing media of any kind for children requires care, thought, and diligence beyond the norms for adults. It requires a willingness to understand that even at their best and brightest, children are, well, children. They cannot reason, rationalize or restrain in the same way adults do. It is adult's responsibility to help them learn, grow and develop in the digital space, just as it is "in real life". It is also our job to protect them, not to exploit them, and to treat them with respect.

With this document, the kidsmediacentre hopes to provide assistance and guidance to developers across Ontario. The developers we interviewed as we gathered information for this report were almost universally engaging, and optimistic about the business. Many of them have deep experience working on properties for children and we would like to thank them for their time and their candor. At the same time, we found some who, while not opposed to learning about ethical development for kids, had simply never considered the idea. We hope this helps them begin the discussion within their own companies and the larger industry. Interactive digital media developers have the tools and the power to create extraordinary, enriching, and entertaining experiences. But as Voltaire, and the creator of Marvel Comic's Spiderman, Stan Lee, both observed – "With great power comes great responsibility."



# CASE STUDY REVIEW: THE PIX INDEX

The following criteria represent a continuum of marketing ethics in the design of children's interactive media. In some cases, governments have regulated acceptable industry practices (PIPEDA, COPPA, Broadcast Code). In other cases, best practices are self-regulated by ethical discussion and consensus amongst industry practitioners.

Any discussion around the development, marketing and monetization of children's digital media should include the following key considerations:

- Children cannot be expected to understand the intricate ways in which data collection works. Therefore, it is the responsibility of the developer to seek and obtain verifiable consent. In Canada, developers are expected to follow PIPEDA and COPPA.
- Children's privacy needs to be safeguarded to keep them safe. Most children do not have the developmental capacity to weigh and consider all the consequences of sharing personal information in the digital sphere until they approach 13 years of age. This principle is upheld through COPPA regulations.
- Most research agrees children's ability to critically evaluate advertising and marketing and understand attitudinal and emotional persuasion techniques is not fully developed until an adolescent approaches 12 years of age. The "cognitive defense model" argues once children can recognize and understand advertising they can defend themselves from it (Carter, Patterson et al. 2011). Unlike broadcast, digital advertising practices to children are self-regulated and governed, principally, by corporate values and ethics.

## POSITIVE INTERACTIVE EXPERIENCE - PIX INDEX

### Parent Engagement / Communication

- 1  Parent Dashboard – full parent oversight. Offers rich opportunities for parental interaction.
- 2  Dedicated parent feature, Child benefits highlighted: learning outcomes, digital mediation tips and curricular connections for parent.
- 3  Parent information on web/mobile site. Focus is on privacy/safety (i.e. disable in-app purchases on device) and company accolades vs. child benefits.
- 4  Passing reference to parents.
- 5  Child/user directed. No acknowledgement of parents.

### Privacy

- 1  Open play – no log in required. Walled garden. No outside links.
- 2  Anonymous log in: username and password only. No PII (Personally identifiable information) captured.
- 3  Site log in required. PII captured/verifiable parent consent required. Adhere to strict information collection, use and disclosure.
- 4  Adult targeted web/mobile experience: Apple or Google Play ID password required for download. Parental log in oversight requested on websites and/or apps.
- 5  PII captured: cookies, IP, device ID, web beacons, etc.

### User Experience (UX)

- 1  Educationally based interactive learning.
- 2  Developmentally appropriate media/interactive experience.
- 3  Fun driven interactive play with a side order of learning.
- 4  Collaborative, community based experience; taps into adolescent development, identity formation, independence and importance of peer connections.
- 5  Good times. No pretense of learning.

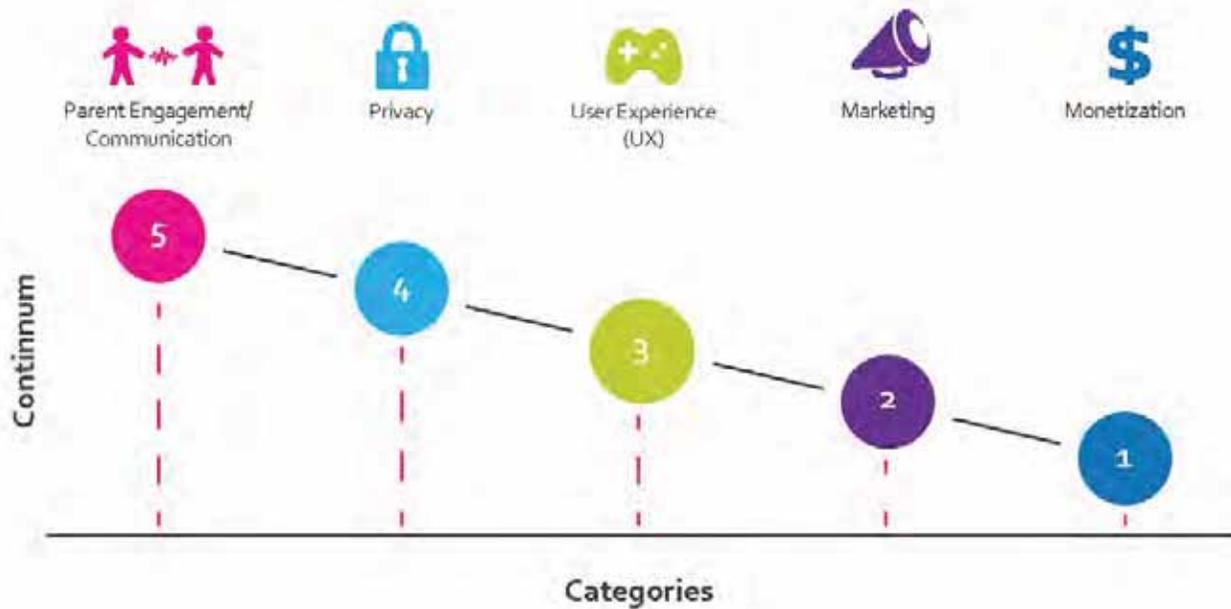
## Marketing

- 1  No advertising.
- 2  In-house ads/cross promotion.
- 3  Merchandising/cross-selling/up-selling/Advergaming.
- 4  Ad networks serving contextual ads. AdSense - age appropriate filtering.
- 5  Third party advertising. Social Media integration and/or gaming services. Behavioural targeting. Developmentally inappropriate data collection, aggregation and profiling.

## Monetization

- 1  None. No direct revenue stream.
- 2  Paid. One time payment for use i.e. premium game. Free demo or lite version with a link to a store page to purchase the full paid version.
- 3  Merchandising/ cross selling/iTunes, DVD's, toys.
- 4  Subscription based/up-selling/pay walls.
- 5  Freemium/micro-transactions.

## LEGEND



## Case Studies and Developer Interviews

1. 39 Clues
2. A Lotta Dessert **(TVO)**
3. Bitstrips
  - a. *Interview with Shahan Panth and Jacob Blackstock, August 27<sup>th</sup>, 2012*
4. Burn the Rope
5. Cross Country Fun Hunt
6. Dino Dan **(TVO)**
  - a. *Interview with Blair Powers, Creative Director, Sinking Ship on January 23<sup>rd</sup>, 2013*
7. Doodlecast
  - a. *Interview with Jason Krogh Founder/Director, zinc Roe, January 21<sup>st</sup>, 2013*
8. Draw Along Pip
  - a. *Interview with Stephen Davis, P. Eng, Chief Technology Officer, Skyreader Media, December 18<sup>th</sup>, 2012*
9. Franklin **(Corus)**
10. Happy Studio
11. iLearnWith
12. Kidobi
13. League of Super Evil **(Corus)**
14. Mega Jump
  - a. *Interview with Andy Smith, Producer, Get Set Games, December 19<sup>th</sup>, 2012*
15. Mr. Young Deeksi **(Corus)**
16. Mudpit
17. My Babysitter's A Vampire
18. Pillars of Freedom **(TVO)**
19. Ruby Skye P.I.
  - a. *Interview with Jill Golick, Creator, Ruby Skye, Story2.Oh, December 20<sup>th</sup>, 2012*
20. Skatoony
  - a. *Interview with Johnny Kalangis, Creative Director, marbledmedia on January 23<sup>rd</sup>, 2013*
21. Super Snack Time
  - a. *Interview with Tom Frenel, Little Guy Games, December 14<sup>th</sup>, 2012*
22. Webkinz
23. Wooz World
24. TVO

- a. *Interview with Pat Ellingson, Creative Head, TVOkids, March 14<sup>th</sup>, 2013*
- 25. Corus
  - a. *Interview with Michael Gray, Executive Producer - Interactive, Corus Entertainment, April 10<sup>th</sup>, 2013*
- 26. James Kosa
  - a. *IT and IP Lawyer, Deeth, Williams and Wall, January 24<sup>th</sup>, 2013*

We also considered the following properties for review, but no final case study was prepared.

1. Ameba TV (Ameba)
2. Babar and the Adventures of Badou (WMTVInteractive)
3. Baxter (Smokebomb)
4. Bolts and Blip: Quest of the Battle Bots (Toonbox/MogiMe Inc.)
5. Cake Artist (Untold Entertainment)
6. Cinderalla (Nosy Crow)
7. Cows vs. Aliens (XMG Studio)
8. Deafplanet.com (marblemedia)
9. Degrassi (XMG Studio)
10. Family Channel Website (Astral Media)
11. Greenville (Phantom Compass)
12. In Real Life (Secret Location)
13. Inspector Gadget's MAD Dash (XMG Studio)
14. Kidoid (Wero Creative)
15. KidsCBC Website (CBC)
16. Master of the Hounds (Skyreader)
17. Minimops (NDiTeravision)
18. omBooks (Oceanhouse Media)
19. PBS Kids Video App (PBS kids)
20. Pebbles Play (Fuel Industries)
21. Powder Monkeys (XMG Studio)
22. Rock Mars (Wero Creative)
23. Rollers of the Realm (Phantom Compass)
24. Sidekick (WMTVInteractive)
25. Sid's Science Fair (PBS kids)
26. Sissy's Magical Ponycorn Adventure (Untold Entertainment)

27. Sitekick (Corus)
28. SparkCity World (Fuel Industries)
29. Splatalot (marblemedia)
30. Stella and Sam Story Pack (zinc Roe)
31. Super Punch (XMG Studio)
32. Teletoon Website (Astral/Corus)
33. The King Rail Challenge (Black Cherry)
34. THTV (Treehouse TV app) (WMTVInteractive)
35. Total Drama Island (Secret Location)
36. Totally Amp'd (XMG Studio)
37. Treehouse Website (Corus)
38. TVOkids Website (TVO)
39. Wapos Racerz (Phantom Compass)
40. Where's My Water/Where's Perry (Disney)
41. Whirlygig
42. Wumpa's World (NDiTeravision)
43. YTV Website (Corus)



# The 39 Clues



Target Age: 10 to 14 years old

## DESCRIPTION

The 39 Clues is a massive transmedia adventure property. It is a book series, online game and trading card series. The player and reader must find the 39 Clues to save civilization from peril. Each book comes with 6 trading cards and unlocks one clue.



Entertaining themes such as the Bermuda Triangle, The Loch Ness monster and spies are all part of this middle-school series.

## CREATOR

Scholastic  
[www.the39clues.scholastic.com](http://www.the39clues.scholastic.com)

## PROPERTY RELEVANCE

We were interested in how the property uses multiple platforms – trading cards, online game and books – to enhance the experience and story.

*"The Cahills are the most powerful family in history. The 39 clues that reveal the sources of that power have been hidden...until now. Read the books, collect the cards, find the clues, and win the prizes. The hunt is on. Are you in?"*

-Scholastic Website, The 39 Clues website



Trading cards are included with books and are part of the search for clues.



## LOGIN INFO REQUIRED

When logging into the site the player must provide their username, password, gender, date of birth, country and e-mail.

A user is also asked questions when they login, i.e. "Would you rather be a secret agent or professional athlete?" to put them into a player group – such as the Lucian branch.

## INFO FOR PARENTS

There is no information for parents on The 39 Clues website.  
[www.the39clues.com/](http://www.the39clues.com/)

## PRIVACY POLICY

The privacy policy can easily be found when logging into the site. At sign up, they also state that a user name must not be the player's full name, e-mail address, home address, school name or date of birth.

*"Just when Amy and Dan Cahill think their family is safe, disaster strikes – seven Cahills are kidnapped by a shadowy group known only as the Vespers. Amy and Dan have only days to fulfill a bizarre ransom request or the captured seven will start dying?"*

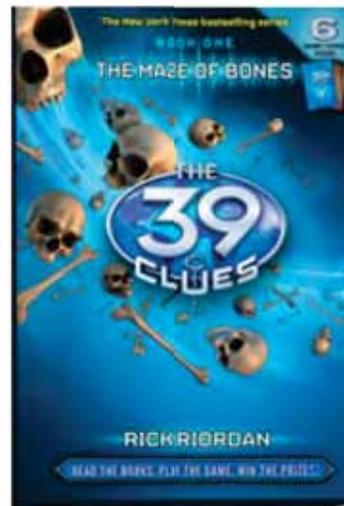
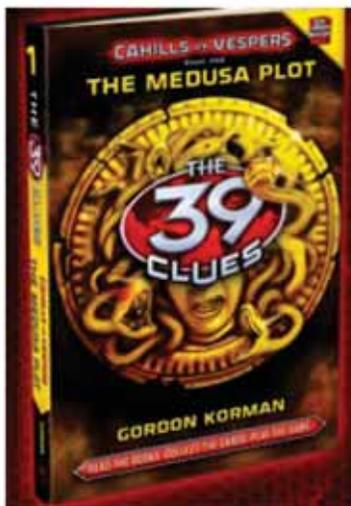
-The 39 Clues Website, Book 1: Medusa Plot

## IN-PRODUCT ADVERTISING

There is promotion for the books and card packs on the website. However, there is little prompting to buy, and no evidence of pricing.

## "STICKY" CONTENT

This is an ongoing adventure series, with new and updated card packs and books being regularly launched. The website functions to enhance the story experience for the child.



The 39 Clues, adventure series books are written by multiple authors.



## REVENUE STREAM

The website for The 39 Clues is free to use, but the book and card packs must be purchased.

## MARKETING & ADVERTISING

Scholastic sells all their books through a combination of book catalogues distributed in schools, social media and e-commerce. The Scholastic brochure reaches almost all children in Canada offering the company amazing advertising reach. According to one teacher, "Scholastic is the most successful children's advertising vehicle ever created."

*"... Only the toughest players will make it to the 40th location on the map. The race is on to collect all 39 clues. Good luck. You're going to need it."*

-The 39 Clues Online game



Players can collect clues and enter them into the online interactive map.



# A Lotta Dessert



Target Age: 2 to 5 years old

## DESCRIPTION

A Lotta Dessert is an online mini-game. Children are asked to repeat patterns by layering different fruits, granola and yogurt to create a healthy dessert. The game features TVO character Lotta Numbers from Gisele's Big Backyard.



## CREATOR

Untold Entertainment for TVOkids  
[www.tvokids.com/games/lottadessert](http://www.tvokids.com/games/lottadessert)

## PROPERTY RELEVANCE

A Lotta Dessert is an example of a commissioned property for TVO by an independent Toronto developer. It is also a great example of a simple and effective mini-game for young children.

*"Playing the game A Lotta Dessert helps your child accomplish many learning goals one of which is the following: The Kindergarten Program, Math: Patterning, Explore patterns in the natural and built environment (e.g., patterns in the design of buildings, in flowers, on animals' coats)."*

-TVO Website parent section



Children must follow the pattern of the items in the dessert glass.

## LOGIN INFO REQUIRED

No login info is required.

## INFO FOR PARENTS

Parents receive information about the educational benefits of the game. They are also told how to extend the activity at home, to promote healthy eating.  
Website: <http://tvoparents.tvo.org/activity/lotta-dessert>

# A Lotta Dessert



## PRIVACY POLICY

The privacy policy is the standard TVO privacy policy that extends across all digital content.

## IN-PRODUCT ADVERTISING

There is no in-product advertising in this game. It does, however, extend the brand of Gisele's Big Backyard by featuring a character from the show.

## "STICKY" CONTENT

A child may want to play this game again to challenge themselves to create new desserts and patterns, but there is no direct encouragement to play again.

## REVENUE STREAM

A Lotta Dessert is a free game.

## MARKETING & ADVERTISING

The game functions as a way to promote TVOkids' TV properties.



The game becomes more difficult as the child incorporates more food items into the pattern.



The game features, the character, Lotta Numbers from Gisele's Big Backyard. Lotta Numbers instructs the child on how to play the game.



# Bitstrips



Target Age: 13 + years old

## DESCRIPTION

An online comic strip creator. A user can create characters, avatars and comic strips and share them online.



Bitstrips began as a social media website for anyone who wanted to make a comic. It quickly grew into a community of devoted users who were mostly adults. Educators also saw the potential of this tool in the classroom and school boards across North America licensed the software to help deliver media literacy curriculum. Kids, who were familiar with the application through school, started migrating to the general website (vs school site) excited by its creative possibilities. Bitstrips is very much a mixed audience website and creators estimate one third of their traffic is children under 13, a third are 13- 18 and the remainder, 18+.

## CREATOR

Bitstrips  
www.bitstrips.com/

## PROPERTY RELEVANCE

We chose this website because we were interested in the intergenerational community on the site. The creators originally intended it for an adult audience, but when children gravitated to it they had to accommodate a younger audience.



Users create an avatar alter ego.

*"When we started Bitstrips we said 'our audience is everybody' and we didn't set out to make a site for any specific demographic."*

**– Jacob Blackstock, Bitstrips Creative Director and CEO**

## LOGIN INFO REQUIRED

Yes. If a user is under 13 years of age they must provide their parent's e-mail.

## INFO FOR PARENTS

E-mail is sent to parents if user is a minor. Parents have access to a child's account, password and the site's privacy policy. Parents also have their own moderation controls and are able to track their child's postings and delete their child's account.

## USER GENERATED CONTENT

Users can share comics and post online.

*"...Recent Studies point to comics as an effective way to develop student literacy. This insight led to the creation of Bitstrips for Schools, a site specifically tailored to meet the needs of teachers and students."*

**–National Reading Project**



*“In the forum there are very detailed flags that the community could put on any comic that would be reviewed within 24 hours. If someone published a comic that had hateful or abusive material it would get taken down right away.”*

**-Jacob Blackstock, Bitstrips Creative Director and CEO**

**SOCIAL MEDIA**

Users can sign into their Facebook account through the Bitstrips website. They are shown which friends have already signed up for the Bitstrips site.

**IN-PRODUCT ADVERTISING**

There is Google AdSense advertising on the Bitstrips site. Ads are monitored and filtered to ensure they are age appropriate for their users.

**“STICKY” CONTENT**

This is an open-ended creative space. Some users create ongoing strips and gain a following for their work.



Users have many options and tools they can utilize to create their comics.



Users can read, comment and “like” comics grouped into categories such as news, drama and humour.

*“There was grumbling from adults. They’d been hanging out in a cool place and all of a sudden it’s been overrun by kids... but meanwhile these adult authors suddenly have legions of 12-year-old fans.”*

**-Jacob Blackstock, Bitstrips Creative Director and CEO**

**REVENUE STREAM**

It’s free to use the Bistrups website, but there are ads on the site. The Ontario Ministry of Education has also licensed the Bitstrips software for use in schools, as have many School Boards across North America. This is another way the company has monetized their software.

**MARKETING & ADVERTISING**

The advertising on the site is generated by Google AdSense. The site also benefits from word-of-mouth because of the heavy involvement of children in comic creation.

*“Before you can comment, no matter what your age on the website, you have to read and accept our community guidelines that remind you of what we define as acceptable behavior. Its not written in legalese, but very plain language and kind of shames you, if necessary into being a decent person.”*

**-Shahan Panth, Bitstrips, VP Marketing**



# Burn The Rope



Target Age: All-Ages

## DESCRIPTION

Burn the Rope is a mobile app for Android and Apple iOS. This app, like Angry Birds, takes a seemingly simple concept and creates an increasingly difficult puzzle game for the tablet and smartphone.



A flame is ignited on a rope and the user tilts their device to control the flame and burn up as much of the rope as possible. This is an easy-to-use game that grows in complexity as the player advances in levels.

## CREATOR

Big Blue Bubble  
[www.bigbluebubble.com/](http://www.bigbluebubble.com/)

## PROPERTY RELEVANCE

We were interested in looking at a popular all-ages app (rated 4+, App Store; Everyone, Google Play). Both the free and paid version of Burn the Rope are top-rated apps.

## LOGIN INFO REQUIRED

User must login in with their Apple ID or through Google Play to download the game.

*"In Burn the Rope users have the freedom to set fire without any fire hazard or need for a fire extinguisher. The game involves a mix of strategic planning, thinking ahead, coordination and the ability to stay in deep focus."*

-Burn The Rope Website

## PRIVACY POLICY

None available in App Store or Google Play.

## INFO FOR PARENTS

None.

## SOCIAL MEDIA

A player can login to the game via Twitter or Facebook.

## USER GENERATED CONTENT

Players can create and share their own customized Burn the Rope puzzles. Anyone who submits a design has a chance to have their puzzles become an actual Burn the Rope level.

## IN-PRODUCT ADVERTISING

There is advertising in the free version of Burn the Rope and the paid version, the latter offering an in-app purchase of \$0.99 to eliminate the ads.



## "STICKY" CONTENT

A player is encouraged to return to the game to improve their score – a player can have a bronze, silver or gold score. There are also a large number of levels and level packs that keep the user engaged.

The developers, Big Blue Bubble, also keep adding new levels and puzzles to their updated games to increase the playability.

## REVENUE STREAM

The free version of the Burn the Rope app has advertising in it. There are also in-app purchases (\$1.99 top price point). User comment in Google Play store review from Carter Woot: "Game is great but game interrupting ads make it completely unplayable". There is an ad-free version of the app that the user can pay for.

## MARKETING & ADVERTISING

Since it is a top app it receives a great deal of promotion from the App Store and Google Play.



The game has a great deal of content. The most recent version boasts over 100 levels.



# Cross Country Fun Hunt



Target Age: 9-14 years old

## DESCRIPTION

A companion site to the CBC TV series. Cross Country Fun Hunt allows users to see hometown-boosting photos and videos by other users, "Like" or comment on photos and videos, add their own public photos or videos, vote on the host's next destination, and chat "live" with the host.



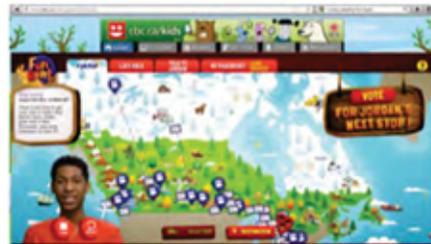
## CREATOR

Kids' CBC  
[www.cbc.ca/kids/games/funhunt/index.html](http://www.cbc.ca/kids/games/funhunt/index.html)

## PROPERTY RELEVANCE

CBC created an interactive experience allowing children to connect through the website and see their interactions on television. Cross Country Fun Hunt experimented with a full brand extension online, almost seamlessly connecting the two media.

*"Make your password something hard to guess but easy to remember! Then write it down and keep it somewhere safe. And don't use your name!"*



Follow Jordan across Canada.

## LOGIN INFO REQUIRED

To view the site, no login is required. To participate in online voting, commenting, and communicating with Jordan, a login is required. Login info required is: Nickname, Password, Parent e-mail, User e-mail, and confirming that both Parent and User have read and agreed to the rules.

## INFO FOR PARENTS

"Parent's Corner" link at bottom of page takes parents to CBC Parents (<http://www.cbc.ca/parents/>). This site is basically a blog with promotions for various CBC properties and does not explain the Cross Country Fun Hunt site to parents.



## IN-PRODUCT ADVERTISING

The ads featured on the website come directly from [cbc.ca/kids](http://cbc.ca/kids).

## "STICKY" CONTENT

The ongoing experience follows the host of the television show as he travels across Canada. Children are encouraged to return to keep track of his progress and share stories about where they live.

## REVENUE STREAM

Cross Country Fun Hunt is an entirely free to use website.

## MARKETING & ADVERTISING

The site is advertised through [kidscbc.ca](http://kidscbc.ca) and through the associated television show.



Write a message to Jordan.



Target Age: 6 to 11 years old

## DESCRIPTION



A companion site to the Dino Dan television series on TVO. It features games and activities that educate children about dinosaurs and archaeology. A child can dig up dinosaur bones in a dig site and play mini-games like Quetzalcoatlus Quest and Dino Duels. They can also visit the egg hatchery on the site to learn more about dinos.

Games and activities are free to play. If a child wishes to keep track of their progress and unlock content they must register with a login ID and password.

## CREATOR

Sinking Ship Entertainment  
[www.tvokids.com/games/dinodan](http://www.tvokids.com/games/dinodan)

## PROPERTY RELEVANCE

We looked at this property because it is a great example of a site that offers both educational information and a fun, child-lead experience.

## LOGIN INFO REQUIRED

A child has the option to access the entire site without logging in. If a child does choose to log into the Dino Dan website only non-identifiable information is asked. If a child logs in they must provide a parent or guardian's e-mail address. There are no opportunities for children to communicate with each other on the site.

*"We have a passive sign in. People still have full access to the site without signing in. If a kid does sign up we send a very detailed e-mail to parents. People get frustrated if they have to start from scratch each time. Some get frustrated when they feel pressured to sign in. We reach a wider range of people this way."*

**-Blair Powers, Partner, Sinking Ship Entertainment**

## PRIVACY POLICY

The game operates inside the TVOkids web space and is subject to their privacy policy.

## INFO FOR PARENTS

None on the game site. Upon registration, parent is sent e-mail that lists what information has been asked of child, provides access to child's profile page, and offers the ability to delete child's profile and e-mail address. There is extensive information for parents on [TVOparents.tv.org](http://TVOparents.tv.org).

## SOCIAL MEDIA

No links to social media on the children's site. There is a Facebook page for Dino Dan that promotes the TV show and brand mainly to parents.

## USER GENERATED CONTENT

None.



*"It is important to be authentic to your brand. That is why we had museums on board from the beginning. Everything kids are learning is real. Why can't facts about dinosaurs be just as interesting as having talking cartoon dinos that are not based on any facts at all?"*

-Blair Powers, Partner, Sinking Ship Entertainment



On the Dino Dan home page, Dan's backyard, dinos can be seen roaming about.



A cartoon version of Dan offers clear text and audio instructions to the child.

## IN-PRODUCT ADVERTISING

There is no advertising. The Bell Fund, CMF and TVO logos are present on the site to show their support as funders and partners.

## "STICKY" CONTENT

There is enticement to spend time and return to the site because of the rich game experience and new content is always being added. Children can earn points by playing games. With these points they can purchase dino-food and dinosaurs in the dino shop. New dinosaurs and food can increase the playability of the games. There is no requirement to feed or maintain anything on the site. Dinosaurs, however, do have a life meter which will run low.

## REVENUE STREAM

There is nothing for sale on the game website because it is hosted by public broadcaster, TVO. However, the Dino Dan brand does include merchandise such as dinosaur toys available at Toys R Us and through a Dino Dan merchandise website. A child can type in a code included with their toy to unlock additional content on the website. There are also 6 mobile apps available through App Store. Prices range from free to \$2.99.

## MARKETING & ADVERTISING

*"Our DVD sales have been the backbone of the brand. There has been an aggressive ad campaign in the U.S. through magazines, through other DVDs and traditional advertising."* – Blair Powers, Partner, Sinking Ship Entertainment



The child can play mini-games on the site such as, Quetzalcoatlus Quest.



The child can dig up dinosaur bones in the dig site section of the Dino Dan website.

*"We have an obligation to listen to our audience. We used to feel we shouldn't have anything for sale. Now we realize there is a demand. If people like your brand they want to participate in it... If there is a fee, there has to be value."*

-Blair Powers, Partner, Sinking Ship Entertainment

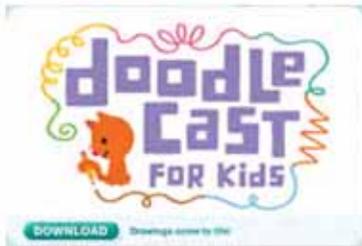
# Doodlecast



Target Age: 2 to 5 years old

## DESCRIPTION

Doodlecast is an iOS drawing app. A user can draw a picture and their voice is recorded as they draw. Essentially, children become narrators of their own animation. The child can save and share their drawings on YouTube. There is a lot of potential for this app because a child can use it for creative play and school projects – for example, they could draw the solar system while naming the planets.



## CREATOR

zinc Roe - now Sago Sago  
[www.zincroe.com/](http://www.zincroe.com/)  
[www.sagosago.com/](http://www.sagosago.com/)

## PROPERTY RELEVANCE

Doodlecast is a great example of the type of work produced by zinc Roe. It's an interesting example of an app that allows a child to create user generated content that they can then share.

*"Empowerment is the best word for the experience we are trying to create. Kids should feel a sense of control and competency they would not normally get to feel. This app (Doodlecast) encourages that."*

**-Jason Krogh, zinc Roe**

## LOGIN INFO REQUIRED

No login info is asked of the user.

## PRIVACY POLICY

None.

## "STICKY" CONTENT

There is no 'play-through' of this app, unlike a book or game. Doodlecast is a child-led and open-ended experience. Users may choose to return to draw more pictures or continue to share the experience. It could also be utilized in a classroom setting.

## USER GENERATED CONTENT



The user can share content via YouTube and there are lots of proud parents organically endorsing this product. There is no push-through link or direct connection to YouTube – the user must log in to their account. Educators are also recommending the tool as a great way to capture a child's learning. The app doesn't require a lot of reading or fine motor navigation so it offers tremendous application at the preschool and primary level.



## INFO FOR PARENTS

There is no parent information in the app itself, however there are easy-to-follow instructions on the App Store page. There is also parent information about the Tickle Tap Apps package, which Doodlecast is part of, on the zinc Roe website.

## REVENUE STREAM

The Doodlecast app can be purchased through the App Store.

## MARKETING & ADVERTISING

*"We do a little bit of everything. We've done banner ads, Facebook ads, YouTube ads, contests and giveaways and we've done special events. There is little evidence of payback with the paid advertising. We have been lucky that a few journalists have liked our work and promoted us."* - Jason Krogh, zinc Roe

*"The biggest thing as a producer of kids content is to not take advantage. There is an opportunity to exploit that immature audience. In-app purchases are wrong. Kids don't have fully developed self-control and you can't take advantage of that."*

-Jason Krogh, zinc Roe



Doodlecast activities.



## Draw Along Pip



Target Age: 2 to 5 years old

### DESCRIPTION

Draw Along Pip is a digital interactive eBook. A child traces or draws shapes on the page to advance the story. There are hidden interactive elements on each page that a child can discover.



Skyreader Media has over 7000 books under license from publishers. They currently have two custom built books in the App Store and 20 other apps in the market.

### CREATOR

Skyreader Media  
[www.skyreadermedia.com/](http://www.skyreadermedia.com/)

### PROPERTY RELEVANCE

We chose this because it's both an eBook and it has inventive interactive elements on each page. Also, we were intrigued that the company uses in-house author, Leslie McGuirk, to write the narratives.

### LOGIN INFO REQUIRED

The user (parent) must log into their iTunes account to purchase the book (\$1.99).

### PRIVACY POLICY

There is no privacy policy.

### INFO FOR PARENTS

There is no parent section or parent information.

### SOCIAL MEDIA

There is a link to Twitter and Facebook on the main page. When a user clicks on these icons, a personalized ad is posted to their page saying they are reading Draw Along Pip. This is viewable to their followers and contacts.

*"The primary interaction in the app and story is to draw along and trace to continue the story. The exploratory aspect and interactions are so kids can come back, and keep coming back to rediscover new things in the book."*

—Stephen Davis, CTO, Skyreader Media

### IN-PRODUCT ADVERTISING

At the end of the story, readers are presented with ad titles for nine different Skyreader properties. Clicking on the titles links the user to the App Store where they can then purchase the eBook.

### "STICKY" CONTENT

There is no "sticky" game-play. The "stickiness" is the interactivity and the ability to explore and uncover different elements on each page on repeated reading. Preschool children also love to experience a story over and over.

# Draw Along Pip



## REVENUE STREAM

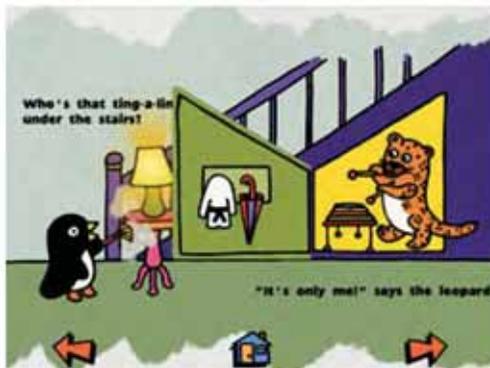
The Draw Along Pip app can be purchased through the App Store. Learning from their own success creating eBooks, Skyreader Media crafted a custom eBook builder available to the public. Would-be authors can generate an eBook using the software for free, and Skyreader acts as a publisher, sharing book sale revenue.

*"We're about to release that to the self-publishing market, to allow anybody who wants to build children's books to do so. You don't have to be a programmer. It's essentially a drag and drop interface for creating animated interactive children's books on the iPad and in the iBook store. We're going to launch this to the self-publishing industry, for independent publishers. We want to make it as simple as possible to get from creating a book to the market, as the publisher of record, and take a rev share off the back end. So our business model is give the tool away, get as many people using it as we can, and we're successful if you're successful." - Stephen Davis, CTO, Skyreader Media*

## MARKETING & ADVERTISING

Other Skyreader titles are promoted on the home page and at the end of the eBook.

*"Our goal is to create other books that would be purchasable through the Draw Along Pip app. We recognize selling stars and upgrades are a way to monetize, but there are lines we won't cross. You have to offer compelling content."*  
-Stephen Davis, CTO, Skyreader Media



Draw Along Pip has interactive story pages.



# Franklin



Target Age: 3 to 6 years old

## DESCRIPTION



A website and mobile app that are an extension of the television show, Franklin and Friends. The player competes in a soapbox derby race against the computer – and the object of the game is to keep improving their race time. As a player progresses the races and levels become more difficult. The user can save, share and upload their races online. The top 20 races were aired on Treehouse TV. The contest is currently closed.

## CREATOR

Corus  
franklin.treehousetv.com

## PROPERTY RELEVANCE

This is a good representation of a multi-platform Treehouse brand. This property not only allows users to share content online, it also offers players the chance to potentially see their race on TV.

## LOGIN INFO REQUIRED

There is no login info required for the site.

## PRIVACY POLICY

There is a detailed Privacy Policy that can be linked to from the Franklin home page.



A child can choose which soap boxcar and character they would like to race.



## INFO FOR PARENTS

There is easy-to-follow information on the website related to how to submit fan art and privacy information collection practices. There is a large button on the site called 'Parents' where this information can be accessed.

## USER GENERATED CONTENT

Races can be saved, uploaded and shared with friends. Children can also share fan art on the website.

*"Who can see my child's name in the fan art section: Anyone coming to the website can see your child's name on their drawing if it's included. It's important for privacy reasons to only include your child's first name on the drawing."*

-Parent section of Franklin's website

## IN-PRODUCT ADVERTISING

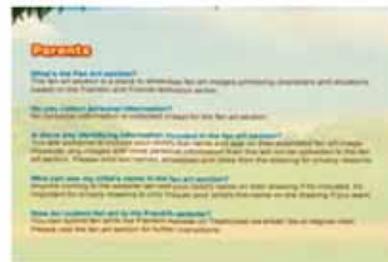
There is no in-product advertising on the site. The principle function of the site is to promote the Franklin and Friends TV series.

## "STICKY" CONTENT

The game and controls are easy to use and play. Players may return to beat the best scores. However, because there is no login, a player's information is not saved so they cannot beat their last score – they have to start from the beginning. Users are encouraged to submit races and look at other users' saved races.



Franklin Bumpy Buggy  
Race screen – advanced level.



Parent section of website.

## REVENUE STREAM

The website is free. The Franklin app, however, can be purchased in the App Store.

## MARKETING & ADVERTISING

The site and app are used to extend the Franklin brand for fans of the TV show, and to direct players back to the TV show.



A player can collect a star  
bonus during the race for a boost.



There is a score screen at the  
end of each race and level.



# Happy Studio



Target Age: 4 to 8 years old

## DESCRIPTION

Happy Studio is a McDonald's-branded virtual world played in 41 European countries. It is geared toward children 4-to-8 years old. They also offer a free mobile app for iOS and Android.



Users are offered games, activities and experiments through the site. A player can choose and customize their avatar, chat using pre-scripted dialogue and earn points to buy additional in-world items. They highlight the fact that there are no subscription fees attached to all this fun (advertising).

In addition to Happy, a character based on the restaurant's Happy Meal box, there are games and activities branded with characters associated with McDonald's.

## CREATOR

Fuel Industries  
[www.happystudio.com/](http://www.happystudio.com/)

## PROPERTY RELEVANCE

We looked at Happy Studio because it is an example of advergaming. The site functions to promote the McDonald's brand. Happy Studio also has a responsible parent dashboard where the parent can both monitor their child's activities on the site and participate in activities with their child. McDonald's is clearly cognizant of a possible "unhealthy" backlash and has compensated by offering a high quality, safe experience for children.

*"Happy Studio is a 360° experience for kids and their parents to enjoy. Each month new famous character friends are at McDonald's waiting for you in your Happy Meal box, on posters, and on the tray liners. But that's not all, they will also be visiting online with games, secret missions, exclusive gifts, rewards and much more!"*

### -Happy Studio Website

## LOGIN INFO REQUIRED

A child must login to participate in the online world. When a new user signs up, Happy Studio requests a parent's e-mail, password and age (optional). A child cannot choose their username; it is created for them with a name generator.

## PRIVACY POLICY

There is a very extensive, easy-to-read, privacy policy and frequently asked question (FAQ) section provided on the parent page of the website.

## INFO FOR PARENTS

There is a great deal of information available for parents, including safety, storage of personal information, cookies and a contact e-mail.

There is also a parent dashboard that allows the parent to monitor their child's progress/learning on the site.

## SOCIAL MEDIA

There are no links to social media on the Happy Studio site.

## USER GENERATED CONTENT

A child has the option to create art on the site and send it to their parents.



*"We believe in learning through play – a method proven through scientific data and research. Therefore we reached out to child experts to help create online games and experiences for families that will not only be fun, but provide tangible educational benefits."*

-Happy Studio Website



A new user must provide the site with their parent's e-mail address.



A player can choose an avatar to represent them in the online Happy Studio world.

## IN-PRODUCT ADVERTISING

In the "Grown Ups" section of the Happy Studio site it states that the site is 'Free of Advertising'. It's true there are no ads on the site for McDonald's food. Aside from the Happy Meal box-shaped character and golden arches, there are no direct connections to McDonald's. That said, the website is being used to extend the traditional broadcast advertising experience and this sticky site no doubt offers a strong top-of-mind recall experience for children.

There are also characters and themes in the experience from brands promoted through McDonald's restaurants. These include: Ice Age 4: Continental Drift, The Pirates! Band of Misfits, Tom & Jerry, Puss In Boots, Shrek, Smurfs and Mudpuddle Farm. Other brands that have been featured on the site include Tintin, Megamind and Hello Kitty.

## "STICKY" CONTENT

There is one voluntary mini-game where the player plants and harvests crops. If a user plays this game, when they log back on to the site they receive the message 'Come back to the garden! Your plants need care.' The plants, however, do not seem to die if unattended.

## REVENUE STREAM

The virtual world is free and there are no add-on methods of monetization on the site.

## MARKETING & ADVERTISING

Although it is not explicit, the entire virtual world is an 'advergame'. It's primary function is to promote the McDonald's brand (and their partners) to children and parents.



The virtual world chat is available in many different languages.



The Parent (or Grown Up) Dashboard provides parents with the opportunity to measure their child's activities on the site.

*"The Grown Up Dashboard can help you monitor your kids' online activities. In the Learning Centre we give you the data collected from your children's play patterns so you can see what they have learned in Happy Studio."*

-Happy Studio, Grown Up Dashboard



Target Age: 3 to 6 years old

## DESCRIPTION



iLearnWith is a series of educational apps designed to teach children basic skills in vocabulary, math, science, listening comprehension and more.

The series of apps includes; iLearnWith Little Pim, iLearnWith Poko: Fun Counting and Addition, and iLearnWith Boing: Savannah Adventures.

Each app features a cute character, like a panda or space alien that leads the child through 3 games with 9 levels in each game. The games are to be played in succession and the child's progress is tracked for the parent. Suggestions are made for the parents around areas of learning that need to be strengthened.

## CREATOR

TribalNova  
www.ilearnwith.com/

## PROPERTY RELEVANCE

We were interested in the iLearnWith series because it is an example of a series of iOS apps for the iPad and iPhone for young children and is linked to school curriculum.

## LOGIN INFO REQUIRED

An iLearnWith user enters their e-mail and password to log into the app. The app also asks for a name and birthday – the birthday is used for personal pedagogical recommendations.

*"iLearnWith is a groundbreaking early childhood education program designed exclusively for iPad, iPhone and iPod touch. It is a cross curricular, game-based school readiness program developed with experts in early childhood development and designers to deliver to children 3 to 6 years old a fun and truly educational experience."* **-iLearnWith website**

## PRIVACY POLICY

Available at ilearnwith.com

## INFO FOR PARENTS

Parents can access information regarding their child's progress. It also recommends what areas a child may be having difficulty with. Parents are also updated via e-mail when a child completes a series of levels. Along with the purchase of the iLearnWith apps, parents are asked to download a second free progress tracking app to help them follow their child.

## SOCIAL MEDIA

There are no links to social media on any of the apps. The parent can follow information about the series on Facebook and Twitter.

## USER GENERATED CONTENT

None.

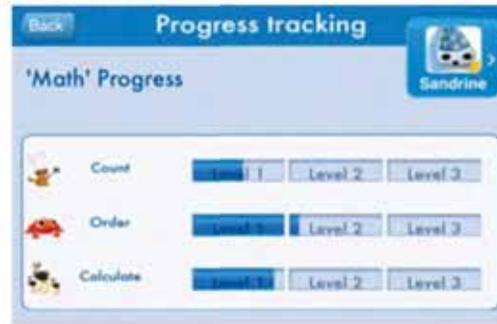


*“My testers completely enjoyed themselves while playing the games and did not realize they were learning as they played. The design details are similar to those used in the other iLearnWith apps making the transition from one app to the other very easy. If you are not familiar with the other apps, they are designed with kids in mind; cheery music, vibrant colors, adorable characters, and a child-like voice used for narration.”*

-Review of iLearn With Boing: Savannah Adventure, Best Apps for Kids



iLearnWith Boing: Savannah Adventures is one of many apps in the iLearnWith series.



A parent section of the app provides progress tracking of the different learning areas for the child.

### IN-PRODUCT ADVERTISING

There are no third party ads in the apps. The progress tracking app introduces parents to the other available products. In the parent section of the app they are also encouraged to buy the other educational apps.

### “STICKY” CONTENT

Children are encouraged to revisit the apps again to complete each level and improve their performance.

### REVENUE STREAM

The series of iLearnWith apps are available for \$2.99 each.

### MARKETING & ADVERTISING

The iLearnWith series is marketed through the App Store. There are also give-aways and promotions for parents on Facebook and Twitter. TribalNova also reaches out to educators encouraging them to incorporate the app series in the classroom.



The iLearn with Poko series of apps teaches children basic math skills.



Kidobi



Target Age: Parents with children 2-6 years old

## DESCRIPTION

Kidobi is an online and mobile video-on-demand service specializing in educational preschool videos. Parents have the option to customize a video playlist and profile for their child based on educational curriculum and family values. It uses artificial intelligence (AI), crowd sourcing and expert opinions to deliver unique content to each child.



## CREATOR

Kidobi Media  
www.kidobi.com

## PROPERTY RELEVANCE

We were interested in presenting an example of video streaming that a parent could modify and control and wasn't fraught with the child privacy and safety challenges of YouTube. Also, the Kidobi rating system is detailed and provides the parent with a variety of programming options for their child.

## LOGIN INFO REQUIRED

Parents must sign up for the site in order to access the video playlists. A user can sign in with a username, e-mail and password. They can alternately sign in through their Facebook account.



A Kidobi Video: The Shushybye Dream Band.

*"One-size-fits-all might work for baseball caps, but it simply doesn't make sense when it comes to your child's education and entertainment. Your child is not like every other child and you are not like every other parent. Traditional children's television is designed to appeal to the broadest possible audience. Kidobi is like a finely tailored suit, carefully designed and custom-made to fit just right."*

-Kidobi Parent section of the website



PRIVACY POLICY

There is a detailed Privacy Policy on the site that explains the necessity of collecting information about a child to customize the content and to improve the site when necessary. There is an explanation of Google Analytics, phishing and cookies and how the site uses these types of data collection.

INFO FOR PARENTS

Most of the information on the site is directed towards parents. The parent section of the site includes a customization area and curriculum information on language, mathematics, emotional development and imagination. The children’s section of the site includes the video player and their playlist.

The ‘Family Values’ page offers targeted program descriptions that make it easy for parents to choose relevant content. Parents can customize programming using the clever 0-5 ratings scale.

*“Commercialism; 0 - Don’t even mention a brand. They get enough exposure just walking down the street.; 5 - The only place you can go without advertising is to sleep.; Intensity/Scariness; 0 - My child is afraid of their own shadow. Sunshine and lollipops only please!; 5 - Nothing scares my kid. Do your worst; Language; 0 - ‘Sugarplum’ is the probably the worst word my child has heard. Keep it clean.; 5 - There is nothing here worse than what they hear in the playground.; Violence 0 - My child tried dropping a safe on his little brother. Let’s not encourage that kind of thing.; 5 - WWE. ”*

SOCIAL MEDIA

The parent section of Kidobi site has links to both Twitter and Facebook. The site uses a Facebook plugin to allow parents to share information about the Kidobi player with their contacts.

USER GENERATED MEDIA

None.



There are many video options for the child. Kidobi partners with content creators to present videos.

IN-PRODUCT ADVERTISING

*“At Kidobi, we believe preschool programming should engage, entertain and teach – never sell. That’s why we provide ad-free content, creating a safe, fun environment for your little learner.” – Kidobi website*



**"STICKY CONTENT"**

Since this is a video-on-demand (VOD) service there is no 'sticky' game play. However, there is a great deal of video content that is added to the site all the time encouraging children to return to watch more videos.

**REVENUE STREAM**

Kidobi offers their basic video package for free. Users can upgrade to a premium package for \$8.00 a month. The apps on Google Play and the App Store are free and ad-free.

**MARKETING & ADVERTISING**

Kidobi uses social media to reach out to parents and teachers. They also offer give-aways such as Freebie Friday where they give away books.

*"KIDOBI offers kids who love to linger on YouTube a safer option for watching videos online. Parents create an account and handpick which videos their child can see; the videos are educationally based, centering on topics like counting and simple science questions. They're also very kid-appropriate – so there's little chance your child will stumble across any adult content."*

**-Common Sense Media review**



A parent section of the video player provides progress tracking of the different learning areas for their child.



In the child section there is a child profile page.



# League of Super Evil



Target age: 10 + years old

## DESCRIPTION

This is a website companion to the television series League of Super Evil (LOSE). It's an interactive website with mini-games, a forum, customizable lairs and characters, videos and an online battle trading card game – Card Game of Doom. Children can play the online games against the computer or with friends.



A player can earn points through mini-games. Points can be used in the mall section to buy items for their avatar, lair or trading cards.

## CREATOR

Nerd Corps  
leagueofsuperevil.ytv.com

## PROPERTY RELEVANCE

We choose to look at this property because it is an example of a DIY online world, where rooms, characters and content are customizable. LOSE also incorporates a massive online battle card game and forum; it's an interesting example of a contained social media experience.

## LOGIN INFO REQUIRED

A player can use parts of the site without logging in, but to have full access, save points and customize avatars, users must sign in. The player registers with a username, password, e-mail, country and gender. Login for the site is through the all-purpose YTV login (parents would have to authorize), i.e. YTV login is used for all properties requiring parental verification.

*" Armed with a whole new approach to badness, The League of Super Evil (a.k.a. L.O.S.E.) follows four Super Villains who have set their sights on nothing less than total neighbourhood domination! "*

-League of Super Evil website

## PRIVACY POLICY

'Nerd Corps abides by the Infants Act (BC), Privacy Act (BC), the Personal Information Protection Act (BC) and the Personal Information Protection and Electronic Documents Act (Canada).' – League of Super Evil website

## INFO FOR PARENTS

There is a link to the YTV Rules and Guidelines from the LOSE homepage for both parents and users. The page outlines rules for the site such as a zero tolerance for cyber-bullying.

Some of the regulations for the message board include no posting personal information, no submitting inappropriate language or behavior and no posting of outside web links.

## SOCIAL MEDIA

There are no links to outside social media websites.



## USER GENERATED CONTENT

LOSE is a very social site and offers a safe community experience. A player can vote on a friend's avatar or lair. There is a forum where you can post game help, challenge players or participate in a general discussion about League of Super Evil. A separate fan-run wiki and YouTube community has also been created.



A player can navigate through Metro Town play space on the League of Super Evil website.



A player can use the interactive game board to play Card Game of Doom with the trading cards they collect.

## IN-PRODUCT ADVERTISING

The site features banner advertising through host YTV, promoting the League of Super Evil brand and TV show.

## "STICKY" CONTENT

Players are encouraged to return to the online world to play games, earn points, further customize their avatar and lair and buy trading cards. The participatory media (forum) also encourages the player to return to the site again and again.

The Card Game of Doom is also engaging – allowing for a rich content experience.

## REVENUE STREAM

The League of Super Evil website is free to use. There is a logo for The Canadian Media Foundation and Bell Fund, indicating site development was supported by these funders.

## MARKETING & ADVERTISING

The site is promoted through the television show and through the broadcaster, YTV.



A player can navigate through the neighborhood, which must be protected from villains.



A user can play mini-games in the arcade to earn points.

# Mega Jump



Target Age: All-Ages

## DESCRIPTION



Mega Jump is a simple freemium app where the player collects coins for their monster, Redford, by making him jump higher and higher. The player controls the monster by tilting their device back and forth. The more coins that are collected the higher the monster jumps and the higher the player's score. Coins can be used to unlock content and levels.

All of the in-game content can be unlocked with patience and persistence. If users wish to speed up gameplay, they can purchase additional coins with real money to unlock new levels, character skins and powerups.

## CREATOR

Get Set Games  
[www.getsetgames.com](http://www.getsetgames.com)

## PROPERTY RELEVANCE

We looked at the app, Mega Jump, because it's a homegrown viral sensation and a game targeted to all ages (rated 4+, App Store; Everyone, Google Play). It features bright, animated, child-friendly graphics and offers easy-to-play game mechanics – making it accessible to a wide audience.

## LOGIN INFO REQUIRED

User require an Apple ID password to download the free Mega Jump app through the App Store and a gmail account for Google Play (earlier version of iOS may not have this safety filter).

*“The attention to detail in this casual title seals the deal. As you fly higher, the background changes from a lush forest to eerie canopies, and eventually into space. The vibrant graphics and colors, including Redford himself, are also full of personality. Who doesn't love a tiny red monster with oversized eyes and cute little fangs? Once you get sick of him, one other member of his monster family can be obtained for free, with three more available as in-app purchases that cost \$0.99 each.”*

**-Slide to Play game review**

## PRIVACY POLICY

There is no privacy policy in the app.

## INFO FOR PARENTS

Since Mega Jump is marketed as an all ages app there is no specific information for parents.

## SOCIAL MEDIA

The game features links to Facebook, Twitter and YouTube. Players can “Like” Mega Jump on Facebook and tweet their scores and they are prompted to do so between levels.

## USER GENERATED CONTENT

There is no user generated content in the Mega Jump app.

# Mega Jump



*"Hey Mega Jumpers! Big news! 10 million people have now downloaded Mega Jump, making it one of the most popular iPhone/iPod games on Earth!"*

-Get Set Games Website



A player can unlock new characters through game play or in-app purchases.



A player collects powerups to gain an energy boost to collect more coins.

## IN-PRODUCT ADVERTISING

Mega Jump is a freemium app; the game is free, and in return features advertising and in-app purchases. The developers attempt to ensure there are no age inappropriate ads in the game on iOS. Reviewers on the iPad were served an ad for a "free Big Gulp" and were asked to enter a mobile phone number to redeem. On the Android, users see offer walls and have the option of installing apps in exchange for free MP (Mega Points). Apps included Casino Slots, Shipwrecked, Fashion Star Boutique, Blood Brothers RPG, Slot Galaxy and more.

## "STICKY" CONTENT

Players return to the game because it's quick and easy to learn. There's also a great deal of game content: 50-60 hour's worth. There is the added challenge of unlocking content and posting a higher score for the Mega Jump player. Theoretically, a user will not need to invest any money into the game if they choose to put in the time, ergo the more you play, the less you spend.

## REVENUE STREAM

Mega Jump is a free game with in-product advertising, contra app promotions and in-app purchases ranging from \$0.99 - \$94.99. There is also Mega Jump character merchandise available, including coffee mugs, t-shirts, and plush toys.

## MARKETING & ADVERTISING

*"We don't spend much money on advertising – we do cross promotions with companies with products we like. We put a promo in our game for them and vice versa."* – Andy Smith, Production Manager, Get Set Games

*"Being number one and free is important to us. There are no pay walls and the user can play 50-60 hours before they have unlocked everything the game has to offer."* – Andy Smith, Production Manager, Get Set Games



Get Set Games has released a sequel game called Mega Run. Mega Run is a platform adventure game.



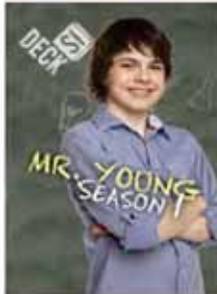
# Mr. Young Decks



Target Age: 9 to 14 years old

## DESCRIPTION

Mr. Young Decks is a virtual trading card game based on the Mr. Young TV series. Playing cards have video clips, character profiles, episode bloopers and episode recaps that can be traded with other online players.



A user can play daily to earn credits and unlock decks to collect all the cards.

## CREATOR

CreativeD  
[mryoung.ytv.com/decks](http://mryoung.ytv.com/decks)

## PROPERTY RELEVANCE

We were interested in how the popular Mr. Young TV series extended its brand to an online trading card game.

## LOGIN INFO REQUIRED

The user must sign in through their YTV account, or create an account to play the game. The YTV account asks for a username and password.

*"... Showing teen life through the eyes of a barely post-pubescent teacher highlights its ups and downs in a unique way. Adam's struggles to fit in with his friends and his professional colleagues are reminiscent of many instances of social uncertainty for kids."*

-Common Sense Media review of Mr. Young TV show

## PRIVACY POLICY

There is no specific privacy policy for the Mr. Young website, but there is an extensive YTV privacy policy. The YTV policy discusses the use of information gathered for online polls, cookies, e-mail identification and membership, and how the site gathers information following current privacy laws and practices.

## INFO FOR PARENTS

There is no specific information for parents on the Mr. Young website, but there is a parent button on the YTV homepage.

## SOCIAL MEDIA

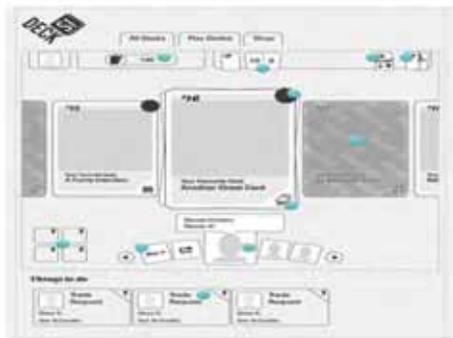
Mr. Young Decks does not link to social media sites like Twitter and Facebook. However, the site itself offers a community experience where users can interact with friends to trade virtual cards.

## USER GENERATED CONTENT

Users cannot generate content for the Mr. Young Decks game but they can share video clips and virtual trading cards with others.

*"The Mr. Young Decks features clips, bloopers, photos, and character bios from the first two seasons of Mr. Young."*

-Mr. Young Decks website



The Decks interface allows a user to play, shop and trade virtual cards.

## IN-PRODUCT ADVERTISING

There are no ads on the Mr. Young Decks site, except for the YTV banner across the top of the page.

## "STICKY" CONTENT

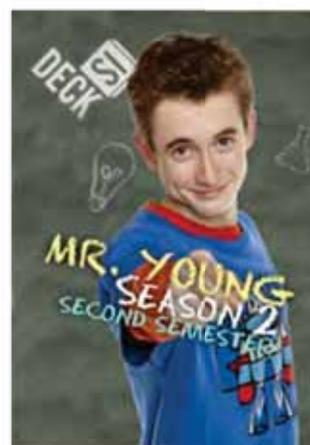
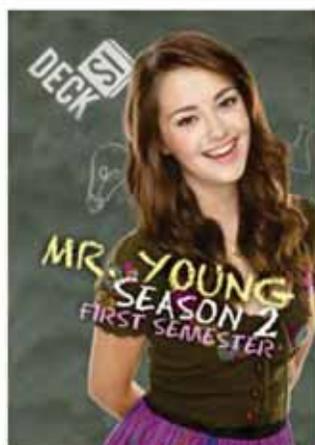
A user is encouraged to return to the game each day to unlock new card packs in the hopes of collecting all three decks. A player is also limited in the amount of "energy" they can use per day and this limits their gameplay time. Additional energy can be purchased with game credits to extend gameplay.

## REVENUE STREAM

Mr. Young Decks is a free online game that functions to promote the Mr. Young TV show on YTV.

## MARKETING & ADVERTISING

The game and website are promoted through the Mr. Young TV series broadcaster, YTV.



Users can trade virtual cards of characters from the TV show.



# Mudpit



Target Age: 10 + years old

## DESCRIPTION

The Mudpit game is a companion site to the Mudpit animated and live action television series. Users can create a band of avatars, dress them and decorate their rehearsal room.



A player can also create music using a simple song creation program on the site. The music created on Mudpit can be saved, remixed, and turned into music videos. A player can also share their musical creations with others.

## CREATORS

NDi Teravision  
www.mudpit.com

## PROPERTY RELEVANCE

We were interested in looking at Mudpit because it's an example of an online music generation game. Note: the game is still in Beta stage.

## LOGIN INFO REQUIRED

Users can log in directly to the site or through their Teletoon account. The Mudpit site asks for the user's age, gender, a username and a parent's e-mail address if the user is under 15. A password and agreement to the privacy policy is required when the user creates an account.

*"Mudpit is a live-action and animated comedy series about four teens who form a virtual rock band in hopes of becoming real rock stars! In each episode, the live-action members of Mudpit head to the Game and Grub gaming cafe where a state-of-the-art video game, Muzika, translates their images and actions into stylized, animated avatars."*

-iTunes Store description of TV series

## PRIVACY POLICY

There is a link on the home page to a Mudpit privacy policy written by Cookie Jar Entertainment. The policy is very detailed and clearly written. It notifies users about information collection practices required to send the user e-mail, newsletters and notifications. It also states that personal information is collected for contests but if the user is under 18, parents must give permission. Other topics covered in the Privacy Policy include online polls, cookies and membership and how the company uses the data collected.

## INFO FOR PARENTS

There is no parent section or information on the Mudpit site. All parent safety and contact information is in the Privacy Policy.

## SOCIAL MEDIA

There are no links to social media such as Facebook and Twitter on the site. However, there is a Mudpit fan page on Facebook. Users can also communicate with each other on the Mudpit site using scripted chat.



**USER GENERATED CONTENT**

A player can create music and/or music videos with the band of avatars they create on Mudpit. These songs and videos can then be shared with other users.

*"...It is our intention to ensure that our site is a safe and enjoyable place for children and their parents to experience. We review this policy regularly and will update it (and other sections of our website) whenever necessary. If there are ever changes made to the way we collect or use personal information, we will always inform our members."*

– Mudpit Privacy Policy



A player's avatar can communicate with other avatars via scripted chat in the Mudpit game.

**IN-PRODUCT ADVERTISING**

There is no third party advertising in the Mudpit game, but there is advertising for Mudpit in-game purchases (not activated in Beta).

**"STICKY" CONTENT**

The rich game experience and ability to connect online with other players encourages a player to return and share with others on the Mudpit site. Since the game is not fully functional and still in beta – there is no opportunity for a player to share their music with other players.

**REVENUE STREAM**

The site is free to join. There is in-game currency called Multipliers, that can be purchased even before the player has logged in. It's not exactly clear what Multipliers are used for; it appears players can buy additional clothing for their avatar and decorations for the rehearsal space.

**MARKETING & ADVERTISING**

The site is marketed through Teletoon. The Mudpit site also functions to extend the brand of the live action and animated television series.



A user can write songs in the music generating section of the site.



A player can customize their band's rehearsal space.

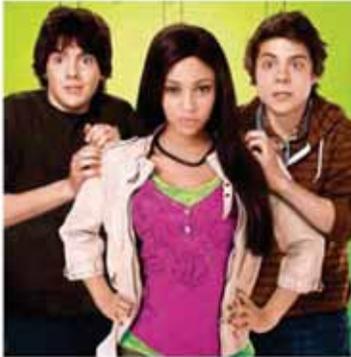


# My Babysitter's a Vampire



Target Age: 10 to 14 years old.

## DESCRIPTION



My Babysitter's a Vampire is a television series with website and app games to augment the series. The game features head-to-head fighting in which users choose a side - humans or vampires. They have the option of competing against the game as a single player, or against other players online (multiplayer).

The outcomes of the online or app battles then determine which side is victorious in the television show's season finale.

The game is available to play in 3D. There are instructions available so the player can make their own 3D glasses.

## CREATOR

Secret Location based on the TV series created by Fresh TV  
[mybabysittersavampire.com](http://mybabysittersavampire.com)

## PROPERTY RELEVANCE

We looked at this property because Secret Location has a solid track record of producing innovative projects. Having the game affect the television series plot is also a unique approach.

## LOGIN INFO REQUIRED

The player is not asked for any login information in order to play the online version of the game.

*"Immerse yourself in the world of My Babysitter's a Vampire with the awesome arcade-style fighting game."*

—My Babysitter's a Vampire website



The number of points earned by the human side vs the vampire side are posted on the homepage of the site.

## PRIVACY POLICY

There is no privacy policy on the My Babysitter's a Vampire website, but it is under the Teletoon umbrella. There is also no login or opportunity for players to share personal information on the site.

# My Babysitter's a Vampire



## INFO FOR PARENTS

There is no information for parents on the site.

## SOCIAL MEDIA

There are no links to any social media sites.

## USER GENERATED CONTENT

Users can affect the overall game and the television series finale by scoring points for either the humans or vampires.

*"Ethan is mortified when his parents insist on hiring his attractive classmate to babysit for his younger sister, Jane. But the evening turns out to be a memorable one when he discovers that Sarah is actually a fledgling vampire who's fighting the urge to feed, which would complete her transformation. Ethan and his best friend, Benny, learn that Sarah's ex-boyfriend, Jesse, leads a den of vamps at the teens' school. Soon after, the three friends uncover the vampires' dark plot to get revenge on the town."*

-Common Sense Media review



A player can choose whether they would like to fight on the side of the vampires or humans. They can also choose which vampire or human character they would like to be.



If the player wins their battle their points are added to whichever team they were fighting for – the humans or the vampires.

## IN-PRODUCT ADVERTISING

There is no in-product advertising; only a banner for the Teletoon broadcaster.

## "STICKY" CONTENT

A player can play the game multiple times to influence the outcome of the television series.

## REVENUE STREAM

The online game, My Babysitter's a Vampire, is free to play. The app is free in the iTunes store but features in-app purchases. While not a direct revenue stream of the website, viewers can also purchase single episodes for \$1.99 or whole seasons for \$14.99 and \$19.99

## MARKETING & ADVERTISING

The website and game function to promote the television series and My Babysitter's a Vampire brand.



# Pillars of Freedom



Target Age: 6 to 11 years old

## DESCRIPTION

This is a companion site to the Pillars of Freedom television series. It features games and activities that educate children about civics and democracy, as well as episodes and a forum to vote on episode endings.



There are both arcade and quest games on the Pillars of Freedom site. The games in the arcade are an assortment of puzzle and pattern games. Most games center around a civics theme. In the quest games, a player collects items and interacts with various Non-Playing Characters (NPCs) to complete the levels and quests.

Games are free to play, but users must register to save their earned points.

## CREATOR

Smiley Guy Studios  
[tvokids.com/games/pillarsfreedom](http://tvokids.com/games/pillarsfreedom)

## PROPERTY RELEVANCE

This is a unique online game teaching children about civic engagement through game-play. It allows children to vote on the site to determine the outcome of the story in the television series. The voting component is also a lesson for children in civic engagement and responsibility; A great example of a game for a public broadcaster (TVO).

## PRIVACY POLICY

There is no separate privacy policy on the Pillars of Freedom website. There is no sharing of information between users nor is it necessary for a child to sign in to play the game.

*"Pillars of Freedom is set in Caveworld, a land that once enjoyed great freedoms but these freedoms have withered away because they were neglected. At the centre of the story are Spirit and Imm, two curious little dragons who embark on a quest to find the mystical Pillars of Freedom that will restore freedom."*

-TVO Parents website

## INFO FOR PARENTS

TVO has an extensive parent website where adults can learn more about the broadcaster's properties and their educational benefits. The site also covers topics such as health, development, school and learning. It also has a parent's toolkit and blog.

## SOCIAL MEDIA

There are no links to any social media on the Pillars of Freedom website. TVO puts all social media links on the Parent site.

## USER GENERATED CONTENT

There are no activities on the site where a player can create their own content. However, a child can contribute to Pillars of Freedom by voting on potential episode endings in the vote section of the site.



## LOGIN INFO REQUIRED

A child does have the option to log in if they would like to keep their points from one play session to the next. However, it is not necessary to log in to use the site and play the games.



There are ten different quests the player can go on, that include: talking to the citizens about what they need and how to turn plans for flying into laws.

## IN-PRODUCT ADVERTISING

There is no in-product advertising on the site. There is a TVOkids.com logo at the top, and the credit section includes the logos of funding agencies, the broadcaster and the creators of the site.

## "STICKY" CONTENT

The Pillar of Freedom games are suitable for a casual gamer. There are no items or activities that need to be tended to daily, and there are no competitive aspects to the games. Although a player can accumulate points there are no items to be purchased with these points, nor do the points offer any additional game content.

## REVENUE STREAM

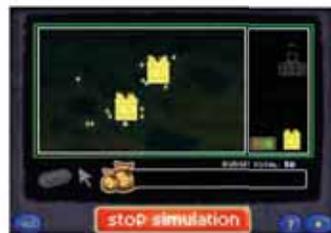
The site and all its games are free for the player to use.

## MARKETING & ADVERTISING

TVO promotes the Pillars of Freedom brand, website and television series.

*"Pillars of Freedom invites children to participate in various aspects of political life. It destroys the notion that governance is something 'over there' or 'boring'. In a single word, it makes democratic ideas 'accessible' through play."*

**-Don Duchene, Concept Creator, Pillars of Freedom**



Users can play civic-themed arcade games on the site such as City Manager 3000, Restore the Report and Hudley's Agenda.



# Ruby Skye P.I.



Target Age: 12 to 15 years old

## DESCRIPTION

Ruby Skye is a webseries that follows the detective work of Ruby Skye, a 15 year old girl who solves neighbourhood mysteries. Viewers can comment on each episode and follow and interact with the characters on Facebook and Twitter.



## CREATOR

Story 2.OH  
rubyskyepi.com

## PROPERTY RELEVANCE

We were interested in Ruby Skye because its a successful award-winning multiplatform webseries. It has many examples of best practices, most stemming from its marketing transparency and safety focus. The site knows its audience. It offers a user-friendly, clearly written privacy policy and honest explanations and rationale for the advertising on the site and in the show. It connects youth to social justice and global issues through YouTube alliances and the 'Because I am a Girl' campaign.

## PRIVACY POLICY

There is a link to a Safety Policy on the main page that explains what a child should be aware of when using the Internet. It's written in clear language and provides guidelines that include "don't be mean, racist, sexist or cruel; tell an adult about anything that happens online that makes you uncomfortable, unhappy or worried; don't share private information with people on the web". The site also has a comment policy that includes no swearing and no ads.

*"Ruby Skye P.I. is reminiscent of Harriet The Spy. It follows the detective work of smart and stubborn Ruby Skye as she tries to uncover mysteries, and stops at nothing to unravel the clues. Complete with best friends, an angst-ridden older sister, and a nemesis, Ruby Skye P.I. is the perfect tween show. Entirely violence-free, full of blog entries and games, it's a great classroom resource for teachers, and a show parents can feel safe about letting their children watch."*

-BlogTO, Top Ten Toronto Web Series

## INFO FOR PARENTS

There is no parent section on the website. There is, however, a section for educators.

## SOCIAL MEDIA

Ruby Skye P.I. has many links to social media; character based Tumblr pages, a Twitter feed and a Facebook page. Fans can connect through YouTube, either by watching the series or creating their own "BookTuber" videos. Social media is obviously a well used tool to create community and ignite passion/fandom for the brand.

## USER GENERATED CONTENT

Fans of the series can comment on the videos and interact with characters on Twitter and Facebook.



**LOGIN INFO REQUIRED**

No log in is required to watch the Ruby Skye P.I. series, which is available on its own site as well as several video streaming sites such as YouTube, Koldcast.TV and Blip.TV.

*"I've always believed the best way to protect kids is to give them tools and teach them how to negotiate the real world ... Kids are on social media and Facebook, that is part of the reality. It's important to give them media literacy tools. Parents need it as well because they are part of our audience. Adults are the mediators in this online world."*

**-Jill Gollick, RubySkye P.I. Creator, Writer, Executive Producer**



Fans of the show can interact with characters Ruby, Hailey and Griffin, via Tumblr, Twitter and Facebook.

**IN-PRODUCT ADVERTISING**

The page has a section of sponsor logos, most of which link directly to the sponsor's sites. Some of the sponsors include: Dragon Academy School, Polaroid and several equipment and post-production companies. The site's producer Jill Gollick says she's in the business of doing "stuff" in an ethical way.

*"We will do our best to do business with products and companies that we believe in. We do think that any company that wants to help us make more Ruby Skye P.I. stories is a pretty great company."* – Ruby Skye P.I. Advertising Policy section of site.

*"Media has abandoned family. What happened to family programming? Programming is all about fear and explosions. There is no place for teens. Family means Disney. Where is stuff for the whole family?"*

**-Jill Gollick, RubySkye P.I. Creator, Writer, Executive Producer**



Viewers can watch episodes from Season 1 and 2 on the website, on YouTube, or other video streaming sites.



## "STICKY" CONTENT

The biggest incentive to return is the quality of the narrative, story-telling and the fan-fiction and community tools that help viewers deconstruct and unravel the latest mystery.

## REVENUE STREAM

Producers have relied on independent production funds to support the series. The webseries is free to watch so there is no revenue attached to viewership. There is a shop on the Ruby Skye P.I. website offering merchandise such as T-shirts, mugs, iPhone cases, USB wrist bands, buttons and more. The site carries Amazon advertising and revenue accrues from traffic on aggregator video streaming websites. The site lists sponsors and actively advertises for new sources of funding to help support the series.

## MARKETING & ADVERTISING

Ruby Skye P.I. relies heavily on PR and social media marketing. The series expansion into various video streaming websites provides both revenue and brand awareness. In June 2013, Ruby Skye also announced a multi-platform deal for winter 2014 broadcast.

*"The goal is to create an entertaining world that gives you the feeling of a really great novel. I like to think of it as two great stories; there's the story characters that kids can relate to and then there's the option to build out story worlds so avid fans can engage."*

—Jill Gollick, Ruby Skye P.I. Creator, Writer, Executive Producer

*"As an independent producer, audience is at the centre of what I do. I'm trying to give kids the quality that I'm not seeing on TV. The girls in my stories have different body shapes and are independent minded. They are girls who are technically astute and solve their own problems."*

—Jill Gollick, Ruby Skye P.I. Creator, Writer, Executive Producer



# Skatoony



Target Age: 8 to 10 years old

## DESCRIPTION

The Skatoony online game is an extension of the television quiz show where live-action children compete against cartoons. On the website, children compete in the quiz show with an avatar they've created. The player can play against other online players or characters generated by the game. Each round becomes more difficult and the player may have a "prank" pulled on them as they try to answer questions.



## CREATOR

marblemedia  
[teletoon.com/en/games/skatoony2](http://teletoon.com/en/games/skatoony2)

## PROPERTY RELEVANCE

We looked at this property to highlight the work of marblemedia and their impressive track record of creating engaging, cross-platform content. This is also a great example of an easy to use, highly interactive game.

## PRIVACY POLICY

The game adheres to the Teletoon privacy policy. Players have the option to sign in to save points and the game only offers scripted chat.



A player can compete against other online players or against characters created by the game.

*"A key lesson I learned as a children's digital producer is to keep things simple. With Skatoony, kids want to play the game, they want to interact with the characters. So we figured out a way to put the kids into that world and give them the value-add. Kids also want a close-up look, the back stories and a narrative context they can't get on the TV show."*

—Johnny Kalangis, Creative Director, marblemedia



**INFO FOR PARENTS**

There is no parent section on the Teletoon site or the Skatoony website.

**SOCIAL MEDIA**

There is a link to both Facebook and YouTube from the Skatoony website, but this seems to be true for most Teletoon properties.

*"We use social media but we never say 'hey, watch our show'. It's for parents and older kids. People connecting through Facebook are already fans of the show, so it's a waste of time to promote it that way. Instead, we offer additional jokes and entertainment."*  
 - Johnny Kalangis, Creative Director, marblemedia

**USER GENERATED CONTENT**

A player can create and save an avatar, interact with friends online via scripted chat and "prank" their friends during the quiz show.

**LOGIN INFO REQUIRED**

A player can sign in as a guest, but if they want to save their points and avatar, they must log in. The login screen asks the player for a username and password.

*"There's never an answer with digital media. Its chaos, tech is always moving forward, expectations change. We need to embrace chaos. In the past with media there has been a landing place – TV found its place and hasn't changed for a long time. The model for movies hasn't changed. Brands, ads, digital media, never lands and is always changing."*

– Johnny Kalangis, Creative Director, marblemedia



A player can customize their avatar, it can also be saved if they log in.

**IN-PRODUCT ADVERTISING**

There are ads for other Teletoon shows above and on the sides of the Skatoony online game.

**"STICKY" CONTENT**

A player may be tempted to return to the game to try and earn one of the top scores, to beat their friends, or to earn more Skatoony currency. The Skatoony currency allows the player to buy additional items for their avatar.



**REVENUE STREAM**

The Skatoony online quiz show is free to play and functions to promote the brand and TV show. The newly launched Skatoony drawing challenge app, Skadoodle, is available in iTunes for \$0.99.

**MARKETING & ADVERTISING**

Creative Director, Johnny Kalangis believes in a multi-platform, multi-tiered approach to advertising and marketing. The Skatoony brand includes: Skatoony apps - Skadoodle and Find the Earl, single episodes and season 1 of the series in iTunes, print ads in magazines such as OWL, advertorials in mommy blogging site YummyMummyClub.ca, etc..

*“Media creators for children have a responsibility to make meaningful things. We should promote positive things like confidence-building or even just having fun. We’ll always remember the things we loved as a kid.”*

– Johnny Kalangis, Creative Director, marblemedia



A player can play “pranks”, compete and chat with other online players.



# Super Snack Time



Target Age: 9+ in App Store

## DESCRIPTION



Super Snack Time is an arcade-style freemium app available in the App Store. There are two creatures in the game, the Hoggians and the Goblins. The player uses a sling to launch Hoggy into the sky to pop Goblins of all shapes, sizes and flavours before they disappear.

The game is quite expansive; there are 60 levels spread over five different environments. There are standard levels and survivor levels. A player has to clear a level to move forward. It is a fun, engaging game with a great deal of content. Players can spend in-game currency on upgrades, weapon upgrades and power-ups.

## CREATOR

Little Guy Games  
[www.supersnacktime.com](http://www.supersnacktime.com)

## PROPERTY RELEVANCE

We chose to look at this app because it's intended for all ages, but skews to a younger demographic (based on the App Store's "also recommended" feature). This is definitely a mixed audience app: the characters are animated and child-like, however, the prompts between levels include adult pop culture references, including Scarface, Dirty Dancing and Ghostbusters.

## PRIVACY POLICY

There is no privacy policy. There is no log in or sharing of information within the app.

*"The casual game industry is shifting. There are now a million Angry Bird – type choices. Users play a few days and get bored. Farmville lost 12 million users in 2 weeks. The challenge is to make your game more engaging."*

**-Tom Frenzel, CEO of Little Guy Games**

## INFO FOR PARENTS

There is no information for parents on the app or on the Super Snack Time website.

## SOCIAL MEDIA

The app encourages users to post their scores on Twitter and Facebook between levels to earn in-game currency. On the Super Snack Time website there are links to Twitter, Facebook and YouTube.

## USER GENERATED CONTENT

There are no opportunities for user generated content in the app.

# Super Snack Time



## LOGIN INFO REQUIRED

The player does not need to log in to play the game.

*"As a creator of apps you do have obligations. If a free game monetizes you can look on the Apple Store or Facebook and see where most of the money is being spent. You then can look at your success pyramid and make a decision on whether you want to exploit this. It comes down to our individual ethics. Some games just have these addictive loops that people continue to spend money on."*

-Tom Frenel, CEO of Little Guy Games



A player must complete each level to move to the next.



If a player can get a combo and hit multiple Gobblens they can clear the screen and advance.

## IN-PRODUCT ADVERTISING

The app follows the freemium model; the app is free but features in-product advertising. Ads pop up between levels, prompting users to watch videos for free coins. The videos end with a full screen ad asking if you want to download the featured app. The ad lingers with no option to close it, and any interaction with the screen automatically takes the player to the App Store.

## "STICKY" CONTENT

The app contains sticky content. There are daily rewards and challenges a player can complete to earn additional coins – ensuring a player comes back each day to the game.

## REVENUE STREAM

The game generates revenue by offering in-app purchases that provide a player with in-game items and power-ups. In-app purchases range from \$0.99 - \$29.99. There are, as mentioned, various ads within the app promoting other apps. Viewing ads provides players with 100 free coins and sharing Super Snack time's trailer on Facebook earns the player 500 points. Ads are generated by Ad Colony, a third party server.

## MARKETING & ADVERTISING

The app is promoted through social media sites Facebook, Twitter and YouTube. Super Snack Time is also promoted through the App Store and on many game review sites.



Target Age: 5 to 15 years old

**DESCRIPTION**

Webkinz is a virtual world where children can adopt and care for a pet. Players can open an account for free, but there are limitations. Users are only allowed to adopt one pet and have restrictions on the amount of time they can play the mini games.

A deluxe membership is available for purchase through the website, or by purchasing a plush toy with a unique login code. All pets have a virtual lifespan of one year. After that, children can renew their account or start anew with another pet.

Once a pet has been adopted, the object is to keep their Health, Happiness and Hunger meters full, requiring regular site visitation. All of the items can be purchased with Kinzcash in the virtual store. Kinzcash can be earned through mini-games and daily challenges or bought with real money. Players can socialize with other online members using scripted chat.

Webkinz was the first child-directed property to offer a virtual version of a real world object or toy.

**CREATOR**

Ganz  
www.webkinz.com

**PROPERTY RELEVANCE**

Webkinz is a highly successful virtual world that offers a physical tie-in commodity. It is one of the industry leaders in this space, inspiring a multitude of spin-offs. Webkinz is targeted to primary school children, between the ages of 5 to 8 years old. It is an enormously immersive experience for children and in a declining category (think: apps) has managed to remain fresh and relevant for a generation of children.



Players can navigate through the virtual world of Webkinz Friends on Facebook. There are stores, places to work and places to socialize.



A player can decorate their online room with items purchased with in-game currency.

**LOGIN INFO REQUIRED**

Users must log in to enter the Webkinz world. To login they must enter their plush code, or a purchased code, their first name, date of birth, their country and province. Gender is optional. A user must be 18+ to accept the user agreement (requiring Verifiable Parental Consent).



## PRIVACY POLICY

There is a link for the privacy policy on the main page. The privacy policy is directed to the parent and not the child, and outlines what personal information is collected (PII) and how it is used.

## INFO FOR PARENTS

The parent area covers topics including; user agreement, frequently asked questions, troubleshooting tips, info about the Webkinz world and KinzChat. There is also a Parent Club website that offers parents games, contests, family activities, an online forum and blog.

## SOCIAL MEDIA

There is a Webkinz App that is now available on Facebook and iOS. Players purchase buildings and adopt new pets to grow the town of Kinzville. The game runs on a reward-based feedback loop; goals are provided and as they are completed new goals present themselves. Each player is limited to a certain amount of 'energy' per day to complete tasks. Businesses need resources (harvested crops) to function and generate in-game currency. Players are invited to add friends that are already playing the game through Facebook. Facebook will post achievements and game updates to your wall on your behalf. There are many fan YouTube videos about Webkinz, and Webkinz has a Facebook fan page and Twitter feed. None of these channels are official. They are all user operated.

*"Webkinz World is a bright, colorful place filled with cute animals, simple video games, chat areas, shopping malls and more. Some kids may enjoy chatting with each other and shopping for clothes for their virtual Webkinz. Others may play games to earn money to add to the houses where their Webkinz live. Kids actually enjoy working towards financial and educational goals on the site and will spend as many hours as you allow exploring and playing."*

-Webkinz review, About.com, Parenting Technology

## USER GENERATED CONTENT

The user can decorate their room, play and care for their pet and chat with other players online.

## IN-PRODUCT ADVERTISING

There is a great deal of advertising on the site, encouraging the purchase of more Ganz toys and other items, including vacations and breakfast cereals. In the parent section there is information about how to shut off all ads for 30-days.

## "STICKY" CONTENT

A child is encouraged to return to the online world daily to collect new prizes, to talk to friends and play daily challenges. If they do not regularly return to feed and play with their pet, the pet's health meter decreases. The pet may become hungry, sick, tired or sad and may need to be taken to school or the doctor.

## REVENUE STREAM

A significant source of revenue for the Webkinz world is through plush purchases. The plush are widely available in toy stores, airports, grocery stores, bookstores, etc.. The prices of the plush vary from \$15-\$30. Players can also make in-game purchases of Kinzcash to purchase items for their rooms and pets. A child is also encouraged to buy multiple pets to add to their account.

## MARKETING & ADVERTISING

Ganz heavily promotes other toys on the website and is constantly updating the content to include more virtual items (there are literally thousands) and more plush toys.

# Wooz World



Target Age: 12 to 16 years old

## DESCRIPTION

Wooz World is an online virtual world targeting preteens and teens. Players are invited to create an avatar (though it costs credits to customize) and socialize with friends. They can also play games and complete challenges to level up and earn credits. There are essentially two themes at play: buy things and socialize.



## CREATOR

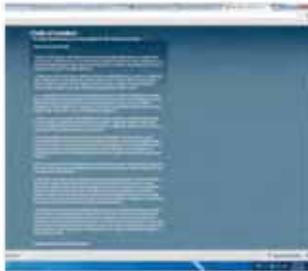
Wooz World  
[www.woozworld.com](http://www.woozworld.com)

## PROPERTY RELEVANCE

Wooz World is a virtual world targeted at a preteen/teen audience.

## LOGIN INFO REQUIRED

Gender, age (6-18+), email (under 13 enter your parent's email), and password are required. There is an option to sign in with facebook for users over 13. The last stage is to accept a very lengthy, legalese heavy, code of conduct (pictured).



## INFO FOR PARENTS

On the main page, there is a section at the bottom titled "Dear Parents" that describes the functionality of the site, as well as linking to COPPA, the Privacy Policy, and PRIVO, a Safe Harbour Program that signals that a developer is abiding by COPPA guidelines.

## PRIVACY POLICY

There is no explanation of privacy, however, there is a privacy policy link in the "General Information" section at the bottom of the main page. It is fairly standard, however the white text on a light blue page in a very small font makes it difficult to read.

## REVENUE STREAM

Wooz World is free to use, but offers subscription packages (\$5.95 a month), as well as microtransactions of in-game currency that helps to further the game experience.



**IN-PRODUCT ADVERTISING**

There are banner ads featured on the website, however, not all of them are child-friendly. There are ads for World of Warcraft and 411 information.

**'STICKY' CONTENT**

Users are encouraged to return to collect prizes every day. You must also continue to work on your achievements. Returning on consecutive days earns you bigger and better prizes.



Build and furnish your own rooms and stores.

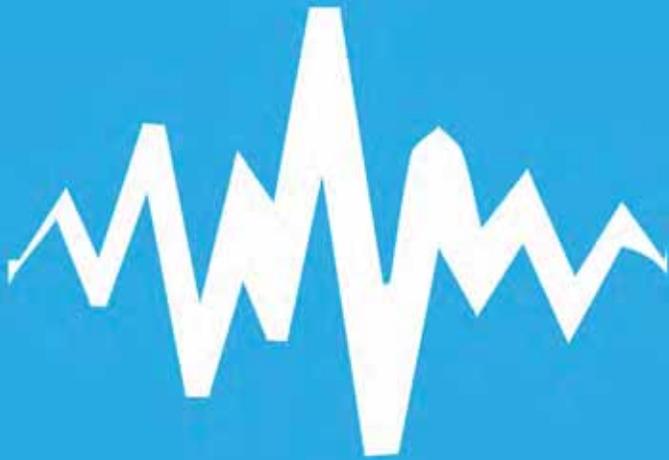
**MARKETING & ADVERTISING**

The game itself is modelled as a free market economy; it is pitched as teens doing business and building their own empires. The game is labeled as 'free' and users are able to play and take part in the social aspect at no cost. VIP (paid) members get to have pets, and have an icon above their head announcing their superior status. Achievements, such as buying furniture, decorating your house, playing games, etc. can only be unlocked by spending Wooz dollars (beex and wooz). Some money can be earned through gameplay, but the return is minimal.



Subscription Packages and microtransactions.

8-9-10



## INFOGRAPHICS

1. Usage and Attitude Data
2. Privacy Primer
3. Child Development Milestones
4. Marketing and Monetization Case Study Summary

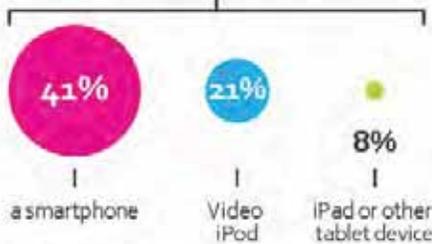
# DIGITAL KIDS: USAGE & ATTITUDE



## CHILDREN'S MOBILE USAGE



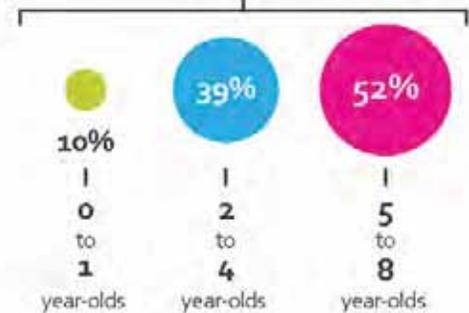
52% of all children have **access** to mobile devices at home:



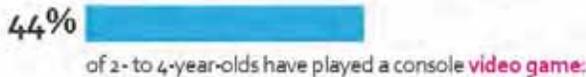
29% of all parents have downloaded "apps"

**APP GAP**  
27% of lower-income children have a parent with a smartphone vs. 57% for higher-income children

38% of children have **used** a mobile device



## CHILDREN'S COMPUTER USAGE & VIDEO GAMING



21% of 5- to 8-year-olds who have homework "usually" or "sometimes" have the TV on while they do their homework

**1hr 44mins a day:**  
The average amount of time children 0 - 8 years old spend watching television or DVDs



**29 minutes a day:**  
The average amount of time children 0 - 8 years old spend reading books or having stories read to them

Source: Zero to Eight: Children's Media Use in America  
Common Sense Media  
October 25, 2011

## MOBILE MANIA



of Americans 2+ years of age are playing some type of freemium game

Source: Freemium Game Study, NPD March 2012

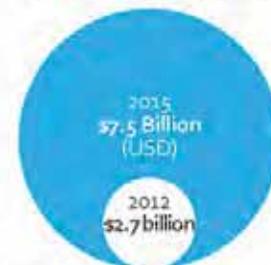


30%

of app gamers made either an in-app purchase or upgraded from a free app to a paid version

Source: Mobile Gaming Report, August 2012

## Size of Global Mobile Game Market

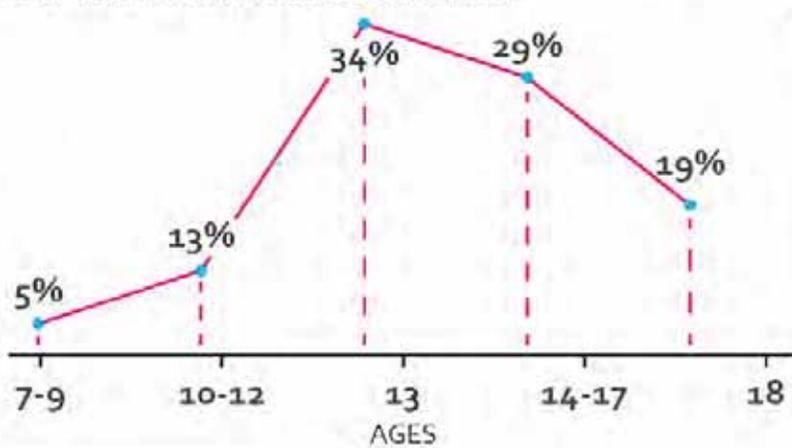


Estimated

## DIGITAL KIDS: USAGE & ATTITUDE



### WHAT'S AN APPROPRIATE AGE FOR KIDS TO GET THEIR OWN FACEBOOK PAGE?

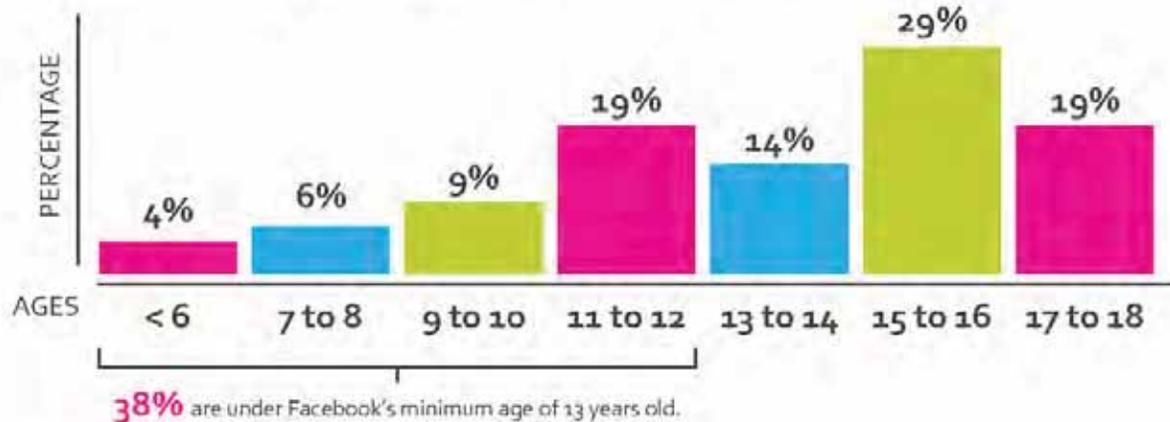


Facebook's current minimum age, **13**, was the most popular choice.

**48%** of voters picked older options.

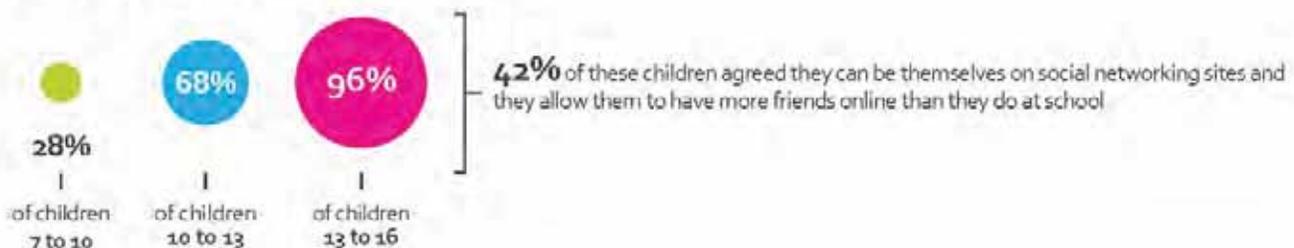
Source: SodaHead March 8th 2012, results taken from Sodahead.com total votes: 2094

### % OF CHILDREN AND YOUTH USING FACEBOOK



Source: Minor Monitor, April 4th 2012. Results taken from minormonitor.com based on 1000 U.S. based parents with minors (defined as youth under 18) who use Facebook.

### HAVE A FACEBOOK PAGE



Source: How Children Relate to Each Other and How They Engage with Digital Content  
Family Kids and Youth: UK  
July 2012

# PRIVACY PRIMER

## Balancing Child Privacy and Safety with Developer's Data Collection Practices



U.S. Federal Trade Commission (FTC)

### COPPA

Safe Harbour Privacy Seals



Canadian Department of Justice

### PIPEDA

Oversight by Canadian and Provincial Privacy Commissioners

**PII**  
Personally Identifiable Information

First and last name, home or other physical address, including the street name and name of a city or town, an email address, a telephone number, social security number, or any other identifier that permits the physical or online of a specific individual. (Source: COPPA)

### Persistent Data Identifiers

- Allows website owners and savvy data aggregators to "maintain state" or keep track of users across page requests, applications and devices
- Tools that enable this: cookies, web beacons, IP address, query strings, hidden frames or fields, server protocols
- These protocols can be used to:
  - Help organize user information (generally seen as a positive) or,
  - To profile individuals (BIG DATA)

### Risks to Children

Website owners or data aggregators can correlate these data and link the activities of a child across different websites or online services. This personally identifiable information (PII) can be used to track and market to a child. This presents a potentially dangerous violation of a child's privacy.

#### Exclusive identifier PII

- First name, last name, physical address, telephone number. An individual can be found using this data.

#### Additive identifier PII

- A coordinate piece of data, which, when added or linked to other data can identify an individual, i.e. geolocation data.



#### Derivative identifier PII

- Facebook login, Facebook or Twitter Connect.
- When a user signs in to a third party site using Facebook an ID is generated and using Facebook Query Language (FQL) a user's data can be linked to Facebook's database.

### Behavioural Advertising

- Allows marketers to "personally market to individual children.
- Uses cookies.
- Tracks previous websites visited and **Pulls** in user's data habits/surf behaviour.
- Intelligence allows company to "re-target" an individual.

### Contextual Advertising

- Pushes** advertising to visitors.
- All visitors to a site see same advertising.
- Ads served are not tailored to individual's browsing and behavioural habits.

#### Source:

[www.digestiblelaw.com/blog.aspx?entry=1228](http://www.digestiblelaw.com/blog.aspx?entry=1228)

<http://blog.fosigrd.org/2012/08/29/coppa-revision-hearings-fosi-hosts-event-on-the-hill/>

## PRESCHOOL

2

### LANGUAGE



#### Language learning Goal: Expanding their Vocabulary

Use simple sentences (2-4 words)  
Understands and responds to longer phrases and requests  
Understands the space around them – “Up” and “Out”  
Beginning to understand grammar – putting words in the proper order

### CREATIVE



#### Creative learning Goal: Engaging their senses

Interested in sensory based activities  
Make sounds by banging and shaking instruments  
Enjoys engaging in the process of creating – process vs. product

### SOCIAL



#### Social learning Goal: Building relationships and showing empathy

Will often choose to play individually  
Children will observe each other and interact as they play but do not yet play co-operatively; Empathic, aware of the body language and facial expressions of others, will express concern when a friend is hurt or sad.  
Seeks autonomy – wants to control and make choices for themselves (e.g. what to eat or wear)

### NUMERACY



#### Math learning Goal: : Expanding numerical sense

Use toys to represent other objects  
Recognize patterns and sort shapes  
Logical reasoning to solve everyday problems  
Understands “some vs none”, but not yet able to distinguish quantities

### SCIENCE



#### Science learning Goal: Practice activities and draw on curiosity

Use their senses to explore the world  
Highly curious – asks many “what”, “where”, “why” questions  
Solve simple problems with trial and error  
Learn through experimentation and repetition  
Use dramatic play to process their experiences

## PRESCHOOL

3  
4

### LANGUAGE



#### Language learning Goal: Expanding their Vocabulary

Uses more complex sentences (e.g. "I want to go outside, its sunny")  
Tend to tell stories in long run on sentences.  
Experiments with language, makes up jokes.  
Begin to recognize their own name in print  
Enjoys words with funny sounds or silly versions of words

### CREATIVE



#### Creative learning Goal: Developing fine motor skills

Greater control over their voices  
Building ability to control tempo and beat  
Creates representations of familiar objects  
Will draw approximate representations  
Developing fine motor skills, which lead to writing  
Naming colours

### SOCIAL



#### Social learning Goal: Building relationships and showing empathy

Developing greater independence  
Seeks out others to play with and will sustain play with peers  
Able to identify their own emotions and the emotions of others  
More competitive  
Begins to listen to peers and problem solve with each other

### NUMERACY



#### Math learning Goal: Strengthening number identification and counting

Developing logical reasoning skills  
Put together puzzles and understand parts that make a whole  
Classification of objects  
Counting to 10 with rote memory  
Understands 1:1 correspondence

### SCIENCE



#### Science learning Goal: Identifying cause and effect situations

Learn through exploration  
Cause and Effect - Hypothesizing  
Concrete thinking – but still preoperational  
Sensory knowledge

## SCHOOL AGE

5  
6  
7

### LANGUAGE



#### Language learning Goal: Communication – reading, writing, listening, speaking

Sentences and grammar structure become more complex  
 Understanding of written materials read by and with the teacher  
 Use reading strategies to make sense of written materials  
 Demonstrate a beginning understanding and critical awareness of media texts

#### Creative learning Goal: Diversity and awareness

### CREATIVE



Diversity and awareness  
 Awareness of themselves as artists  
 Exposure to the arts and activities in the arts  
 Use problem-solving strategies when experimenting with the skills, materials, processes, and techniques used in the arts both individually and with others  
 Responds to a variety of art forms, including those from other cultures  
 Communicate their ideas through various art forms

#### Social learning Goal: Positive self-image and sense of community

### SOCIAL



Sense of identity and a positive self-image  
 Diversity in individuals, families, schools, and the wider community  
 Independence, self-regulation, and a willingness to take responsibility in learning and other activities; Ability to use problem-solving skills in a variety of social contexts; Identify and use social skills in play and other contexts  
 Awareness of their surroundings

#### Math learning Goal: : Concrete math skills – the basics

### NUMERACY



Using concrete materials to explore and investigate counting, quantity, and number relationships; Measure and compare length, mass, capacity, area, temperature of objects/materials, and the passage of time; Explore, recognize, describe, and create patterns; Sort, classify, and display a variety of concrete objects, collect data; Begin to read and describe displays of data, and begin to explore the concept of probability in everyday contexts.

#### Science learning Goal: Care for the world around them – the natural world

### SCIENCE



Awareness of environment through hands-on investigations, observation, questioning, and sharing of their findings; Conduct simple investigations through free exploration, focused exploration, and guided activity; Able to construct simple hypotheses and investigate; Demonstrate an understanding of and care for the natural world; Recognize and use safely some common forms of technology.

## SCHOOL AGE

8  
9  
10

### LANGUAGE



#### Language learning Goal: Listening and reflecting

Listen in order to understand and respond  
Use speaking skills and strategies to communicate  
Reflect on and identify their strengths as listeners and speakers.

### CREATIVE



#### Creative learning Goal: Developing fine motor skills

Creating and Presenting  
Reflecting, Responding, and Analyzing  
Exploring Forms and Cultural Contexts

### SOCIAL



#### Social learning Goal: Social Science, History, Geography

Name and locate the various physical regions, provinces and territories of Canada and identify the chief natural resources of each  
Use a variety of resources and tools to determine the influence of physical factors on the economies and cultures of Ontario and the other provinces and territories.  
Identify, analyse, and describe economic and cultural relationships that link communities and regions within Ontario and across Canada.

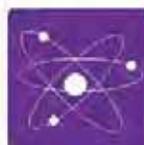
### NUMERACY



#### Math learning Goal: More advanced math concepts – less concrete

Read, represent, compare, and order whole numbers to 10 000, decimal numbers to tenths, and simple fractions, and represent money amounts to \$100  
Counting forward and backwards by 0.1 and by fractional amounts  
Solve problems involving the addition, subtraction, multiplication, and division of single- and multi-digit whole numbers

### SCIENCE



#### Science learning Goal: Effect of humans on communities

Analyse the effects of human activities on habitats and communities.  
Investigate the interdependence of plants and animals within specific habitats and communities.  
Demonstrate an understanding of habitats and communities and the relationships among the plants and animals that live in them.

## TWEEN - TEEN

10  
11  
12

Nearing the end of Piaget's Concrete Operations Stage and entering Formal Operations

**Main Learning Goal:** Applying all these concepts to everyday life

### LANGUAGE



Understanding of a variety of literary, graphic, and informational texts  
Read fluently  
Reflect on and identify their strengths and weaknesses as readers

### CREATIVE



Produce two- and three-dimensional works of art  
Communicate a range of ideas  
Identify the elements of design  
Explain their interpretation of a variety of art works

### SOCIAL



Ability to view things from another's perspective  
Consideration of possible outcomes and consequences  
Trial and error

### NUMERACY



Decentering  
Conservation of mass  
Logical use of symbols related to abstract concepts  
Reversibility  
Transitivity

### SCIENCE



Deductive logic  
Application to hypothetical situations  
Logical proof

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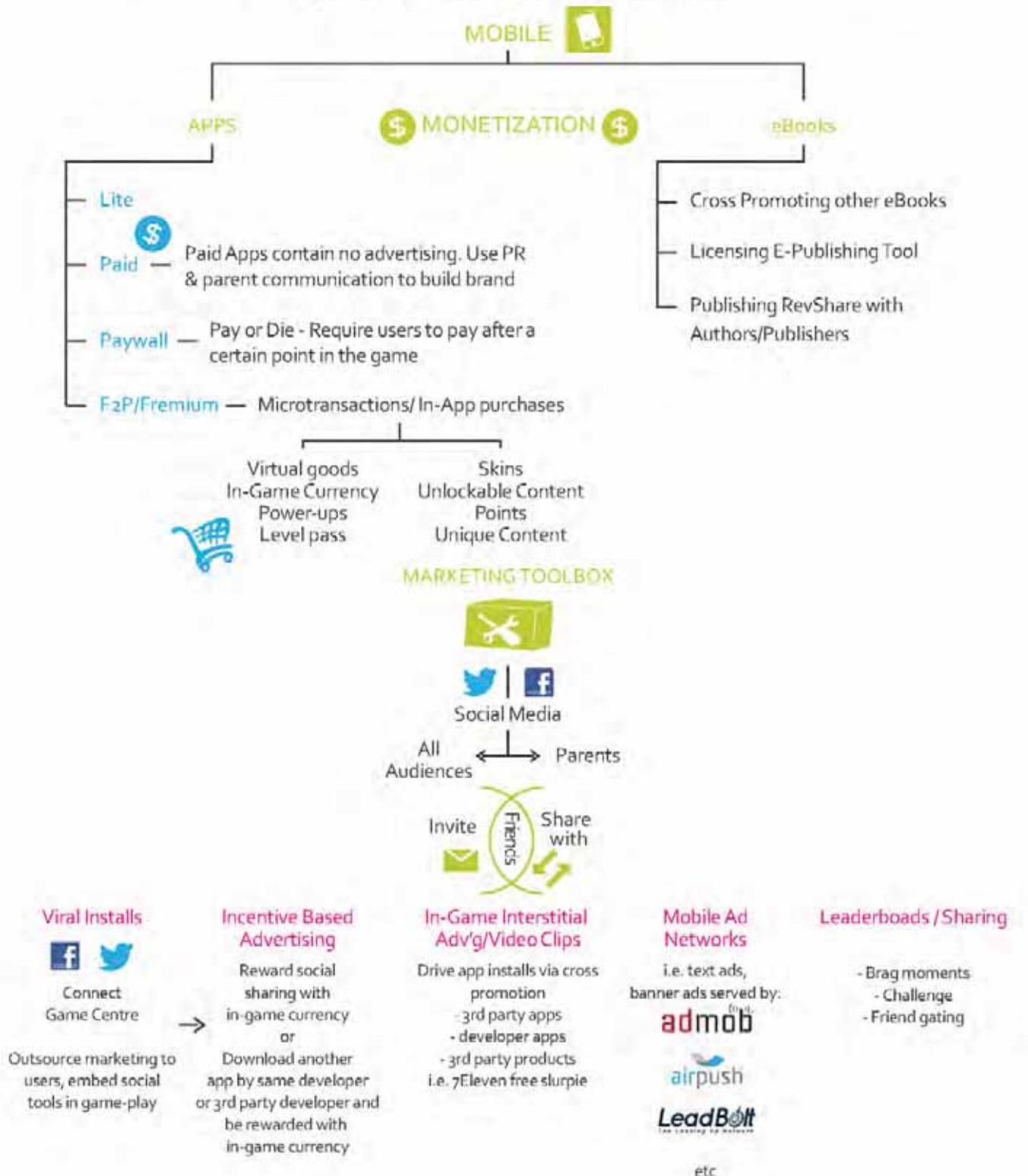
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## MARKETING AND MONETIZING CASE STUDY SUMMARY

Kids' content developers in Ontario are using a wide variety of tools and practices to build their digital brands. Here's a summary of what we saw.



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## Games /Websites

- Broadcaster
- Cross-Promotions
- Custom Branded Games + Site
- Social Media links
- Featured Editorial

## ONLINE



## MARKETING TOOLBOX



- ### Virtual Worlds
- Rich Media Banners
  - "Sweepstakes" & Promotions
  - Social Media
    - Facebook App
    - Game Centre (Apps)

- ### Web Series
- Public Relations
  - Social Media Channels
    - YouTube
    - Tumblr Blogs
    - Facebook/ Twitter
    - Pinterest
  - Companion Website
  - Corporate Social Responsibility



## Video on Demand

- Public Relations

## \$ MONETIZATION \$

- DVD'S
- iTunes
- Cross selling
  - individual episodes
  - seasons
- Merchandise
  - Plush
  - Books
  - Trading cards
- Cross-selling
- Apps (paid + free)
- Google Ad Networks

- Membership / Subscriptions i.e. (VIP, Elite)
- Merchandise
- Microtransactions
  - In-Game currency
- In-Game 3rd party advertising
- Sponsorship
- In-App Purchases
  - \$1.99 - \$99.99

- Merchandise
- Pre-Roll (Koldcast, blip, YouTube, Dailymotion)
- Affiliates (Amazon)
- Sponsorship
- Broadcaster (CBC)
- YouTube (Google Adwords)

## Subscription



## EXHIBITS

### Children's Interactive Media Glossary

**Advergaming:** a game built around a product or service that advertises as a user plays the game.

**App Store:** Virtual store controlled by Apple.

**Appisode:** An episode of a web series purchased for a mobile device.

**Best Practice:** A product or service that appeals to children in a meaningful and respectful way and represents a standard of excellence in digital media.

**Casual Game:** Games classified by their simple use and lack of commitment – can be part of any genre and the complication level varies.

**Cookies:** a small piece of data sent from a website and stored in a web browser. Upon returning to the website, stored data can be retrieved to track previous activity.

**COPPA:** Children's Online Privacy Protection Act (<http://www.coppa.org/>) was enacted on April 21, 2000 to better emphasize the security and protection needed when collecting, using and disclosing information from a child – an individual under the age of 13.

**Digital Media:** Media that is consumable in a virtual space through a device such as a computer, tablet or phone.

**eBook:** Digital book – can be text based or more interactive.

**Forum:** Online community where users can publicly post messages and respond to messages – can be used in a Q and A type format for users to find help from experts respective to that forum.

**Free-to-Play (F2P):** A game/service/app that is offered to the user without payment, similar to "Freemium".

**Freemium:** A game/service/app, either mobile or online, that is free to download, but premium content unique to the game is offered for a price.

**Google Play:** Virtual store owned by Google.

**Grinding:** Is generally understood as being forced to do something that's considered bad or doing something over and over again, in which case the game feels like a "grind". A quick review of the blogs indicates grinding means different things to different people and is often dependent on which mechanics and game features a player likes (i.e. exploration, quests) or dislikes (battles, repetitive tasks). RPG's are often accused of being grind-focused because of the slow-play and slow rewards, however, some fans argue the grinding makes the play better.

**In-Game Currency:** Currency that is unique to the game, earned through play or can be purchased as a micro transaction.

**Interactive eBook:** Digital book that may have simple elements such as pictures or text that moves and can be interacted with.

**Killing Time Game:** Simple, easy to play, easy to learn game that can be played for long or short periods of time, depending on how much time you need to kill; usually a puzzle game.

**LevelUps:** Paying to skip a level in a game in order to progress faster.

**Masher Game:** A game that's more routine than challenging and involves generally mindless button pushing.

**Microtransactions:** Usually associated with "Freemium", or Free-to-Play games. Once an app has been downloaded for free, users can purchase "power-ups" or "boosts" that speed progress, access to new levels, in game currency, or character skins within the game for "real money", with prices for each purchase ranging from \$0.99 in apps from both App Stores, to \$9.99 for Google Play apps and \$29.99 for Apple store apps.

**Mobile:** Service accessible through a portable device.

**Monetization:** How a product or service makes money from the consumer.

**Offer wall:** Developers can partner with other developers, or companies such as TapJoy, which offer in-game incentive, such as power-ups or in game currency, for downloading and using other games.

**Online:** Service featured on a website.

**Password:** Security protection when logging in to a service.

**Paywall:** A player must pay money in a Free-to-Play game before they can access some of the content. Some games may also include a way to get that content for free (Offer

walls), but it becomes so time consuming and frustrating (grinding) that payment may as well be required.

**PIPEDA:** *The Personal Information Protection and Electronics Document Act* (April 13, 2000-present) protects and regulates personal information that is collected, used or disclosed by private sector organizations in the course of commercial business. The act ensures that organizations recognize the right of privacy of an individual, as well as the individual acknowledging the need of an organization to collect, use and disclose personal information that a *reasonable person would consider appropriate in the circumstances*. PIPEDA is one of the more relaxed laws regarding privacy, and explains that taking some information is necessary, but organizations should consider that consent should be given in the case of a minor.

**Powerups/Boosts:** Enhances characters abilities in a game to make gameplay easier or go faster.

**Preschool:** Children ages 2.5-5 years.

**Preteen:** Children ages 11-13.

**School-Age:** Children ages 6-10, may be split into primary (6-8) and Junior (8-10).

**Teen:** Children ages 14-18.

**Universal:** A service that is accessible for all ages – both children and adults.

**Username:** The name you use in lieu of your e-mail to login to a service.

**Verifiable Parental Consent:** Consent obtained for a minor from a parent that is verifiable, whether through notification e-mail, a phone call, a signature, etc.

**Virtual World:** An online community in a simulated environment – allowing users to communicate amongst themselves as well as participate in online activities and build a personal virtual space.

**Walled Playground:** While using the service, the user is unable to link out to other websites, apps, the virtual store, etc.

**Web Series:** Video series that is featured online and generally follows a serial plot. Each episode is usually between 2-10 minutes long and runs similar to a TV schedule – an episode a week, etc.

## Safe Harbor Providers

### PRIVO: PRIVACY, PERMISSION AND TRUST

<http://www.privo.com/>

PRIVO is a one-stop outsource solution that helps companies obtain and manage verifiable parent consent while staying in full compliance with COPPA.

PRIVO indemnifies companies against FTC enforcement with their approved Safe Harbor program and offers parental approved, co-registration opportunities with advertising partners. With PRIVO providing oversight, companies can create one-to-one parental approved and permissioned dialogue with young users. They can also help you understand children's preferences, communicate special offers, introduce new brands, promotions, events, build reliable consumer profiles and enable community-based tools like chat and message boards.

PRIVO offers the following assessment tool:

If you attract children U13 to your online property (website, app, game, service, etc.) then you need to know if and how you trigger COPPA:

- Do you collect personal and/or demographic information from children under 13 (first name, last name, email, phone, username, password, age, gender, city, state/province, hobbies, etc.)?
- Do you facilitate the ability to upload pictures, video and audio?
- Do you provide sharing, "tell a friend" features and/or a wish list?
- Do you use behavioural or contextual marketing or 3<sup>rd</sup> party cookies to track unique identifiers in order to serve better ads?
- Do you encourage information sharing or enrollment with 3<sup>rd</sup> parties or plug-ins?
- Do you enable 3<sup>rd</sup> parties/vendors to contact your subscribers?
- Do you provide Facebook Connect or other open ID authentication services?
- Do you have chat and/or messaging board functions?

If you said yes to any of the above questions you need a COPPA expert.

## Children's Advertising Review Unit (CARU) Safe Harbor

<http://www.asrcreviews.org/2011/07/caru-safe-harbor-program-and-requirements/>

Established in 1974 by the National Advertising Review Council (NARC), CARU is a U.S. based self-regulatory organization of the Council of the Better Business Bureau (CBBB). It covers the promotion of responsible advertising to children under the age of 12 in ALL media, including TV, radio, children's magazines, comic books, the Internet and mobile services.

Responsible ads are not *deceptive, unfair or inappropriate* for the intended audience. CARU monitors and reviews ads, as well as initiating and receiving complaints regarding advertising practices that are not considered responsible. CARU seeks change through voluntary cooperation with the companies involved in the complaints.

As an extension of its mission, to help advertisers deal sensitively with the child audience in a responsible manner, in 1996, CARU added a section highlighting issues unique to the Internet and online privacy and data collection practices for children under 13. **These regulations served as a basis for COPPA, and in January 2001, CARU became the first FTC approved Safe Harbor.** Participants who adhere to CARU's Guidelines are deemed in compliance with COPPA and essentially insulated from FTC enforcement action as long as they comply with program requirements.

CARU's Safe Harbor Program includes the following components:

- Participant's full adherence to the requirements set forth in the CARU Safe Harbor Participation Agreement;
- Participant's compliance with CARU's Self-Regulatory Program for Children's Advertising, including the Guidelines for Online Privacy Protection;
- Review by CARU staff of the participant Website's information practices;
- Ongoing monitoring by CARU staff of the participant's Website to assess and ensure compliance with the Safe Harbor Program;
- Completion of CARU's Self-Assessment Form and Attestation by the Safe Harbor participant; and
- Submission to CARU of an updated Self-Assessment Form and Attestation on each anniversary of the date of acceptance in the CARU Safe Harbor Program.

In addition, the participant agrees to be subject to the provisions of the NAD/CARU/NARB Procedures, including those concerning complaints, appeals and enforcement of compliance.

## Privacy Trust

<http://www.privacytrust.org/>

PrivacyTrust works to aid websites and online businesses in promoting and developing effective online privacy policies. The website outlines a series of Privacy Resources that may be used by businesses to better understand the various factors that should be taken into consideration when creating a privacy policy. They also recommend best practices for the business to follow.

In addition to the guidelines for privacy policies, PrivacyTrust also has a certification program. Websites that follow best practices are provided with a seal that indicates they are in compliance with the PrivacyTrust privacy and data protection essentials. This covers areas such as the collection of personal information and third parties, ensuring that the consumer's data will not be shared without their consent. PrivacyTrust charges \$450 for their certification and the process is generally completed in 12 working days.

Privacy Trust also has an eTrust Safe Harbor program which provides companies with assistance in applying for self-certification in order to properly follow the guidelines from the U.S./EU Safe Harbor Framework provided by the U.S Department of Commerce and the European Commission. In order to self-certify each company must follow the 7 Safe Harbor principles and 15 frequently asked questions.

### 7 Safe Harbor Principles

- **Notice** – Individuals must be informed that their data is being collected and about how it will be used.
- **Choice** – Individuals must have the ability to opt out of the collection and forward transfer of the data to third parties.
- **Onward Transfer** – Transfers of data to third parties may only occur to other organizations that follow adequate data protection principles.
- **Security** – Reasonable efforts must be made to prevent loss of collected information.
- **Data Integrity** – Data must be relevant and reliable for the purpose it was collected for.
- **Access** – Individuals must be able to access information held about them, and correct or delete it if it is inaccurate.
- **Enforcement** – There must be effective means of enforcing these rules.

## ESRB Privacy Online Program

<http://www.esrb.org/privacy/index.jsp>

The ESRB Privacy Online program helps ensure that its member companies are in compliance with the growing complexity of privacy protection laws in the United States and Canada, European Union (EU), Asia-Pacific region and South America. They focus on providing privacy solutions and helping interactive software companies conduct business responsibly while assuring consumers, especially parents, that their personal data is collected and managed appropriately through the display of their Privacy Certified seal.

ESRB Privacy Online currently supports over 2,000 websites and apps.

Their key goal is to help mitigate their members' risk by providing guidance in developing the most effective privacy practices consistent with applicable law.

### ESRB Privacy Online Features

- **COPPA Safe Harbor**  
ESRB Privacy Online was one of the first privacy seal programs sanctioned by the Federal Trade Commission (FTC) as an authorized "Safe Harbor" under the Children's Online Privacy Protection Act (COPPA), an endorsement that helps shield members from potential sanctions and fines.
- **Identity Verification**  
Members can access identity and age verification authentication solutions .
- **Consulting**  
Complete thorough assessments of member's websites or mobile app; identify what the privacy policy should include; provide consultation throughout the life of the product.
- **Monitoring**  
Monitor and spot check member websites and apps and provide regular reports, to help ensure continued compliance.

# Canada's Broadcast Code for Advertising to Children

## Broadcast Code for Advertising vis-a-vis App Advertising

Marketing practices and economics in the *general* digital space come with an understood and well-defined set of metrics and practices including page views, visits, unique users, returning visitors, bounce rates, SEO, IAB space sizes, etc. These metrics allow a company to track user behaviour and refine their digital strategy to determine what works well at a given time with a given audience.

Many of the behavioural tracking tactics used in the larger digital sphere are **not allowed in the children's space** because they require tracking mechanisms deemed inappropriate for children. The revised COPPA guidelines strengthen children's privacy and stipulate that websites, app developers and online services can no longer collect information from kids including persistent identifiers such as IP addresses, usernames and mobile device IDs that recognize children across different online services.

While these new guidelines address issues of privacy, many of the monetization practices in the app space involve tactics and advertising approaches that would never be allowed in the traditional broadcast environment (i.e. allowing a child to watch numerous videos in order to accumulate enough points to continue playing the game). Many parents are completely unaware of these in-app practices and as the FTC report on apps and kids reports, are shocked to see the messaging their children are exposed to. The FTC rules retailers are not to be held accountable for exploitive practices, which means the responsibility falls to the developer.

## Broadcast Regulations for Children

Traditional television advertisers and broadcasters have been following a strict series of and rules and guidelines around children's programming for as long as Canadian children have watched television. Those guidelines are laid out in the *Broadcast Code for Advertising to Children (Children's Code)* and are designed to complement the general principles for ethical advertising outlined in the *Canadian Code of Advertising Standards*, which applies to **all** advertising. Both codes are published and administered by Advertising Standards Canada (ASC) and can be found here:

<http://www.adstandards.com/en/clearance/childrens/broadcastCodeForAdvertisingToChildren-Background.aspx>

The intent of the *Children's Code* is to help marketers and advertisers prepare commercial messages that acknowledge and respect the special needs and characteristics of the children's audience. "Children, especially the very young, live in a

world that is part imaginary, part real and sometimes do not distinguish clearly between the two.” According to the code, children's advertising should respect and not abuse the power of the child's imagination.

Advertising Standards Canada currently provides a checklist (<http://www.adstandards.com/en/clearance/childrens/checklistForInterpretationGuidelines.aspx>) to help marketers and advertisers gauge the appropriateness of their communication. It prompts with a series of qualitative questions, such as:

- Does the advertisement directly urge children to purchase the product?
- Are adults or children portrayed in clearly unsafe acts or situations? (Note: does not apply to safety messages).
- Is the advertisement inconsistent with the moral, ethical or legal standards of contemporary Canadian society?
- Does the advertisement suggest that possession or use of the product makes the owner superior?

The checklist also provides guidelines around the collection of children’s personal information:

- Does the advertisement *collect only the information reasonably required* to allow a child to engage in the activity, *e.g. the minimal amount of personal information sufficient to determine the contest winners*?
- In an advertisement for a contest, game or promotion, is the advertiser limited from dealing with anyone other than the parent or guardian of the winning child?
  - a) Does the advertisement *require permission from the parent or guardian* before a child may provide any information?
  - b) Does the advertisement make *reasonable efforts* to ensure that permission from the parent or guardian is given before a child may provide any information?
  - c) Does the advertisement ask the child to disclose personal information that may identify the child to third parties without obtaining prior consent from the parent or guardian or unless authorized by law?

The children’s code also places guidelines around the scheduling of broadcast marketing messages to children. Provisions include:

(a) The same commercial message or more than one commercial message promoting the same product cannot be aired more than once in a half-hour children’s program. In children’s programs of longer duration, the same commercial message or more than one commercial message promoting the same product must not appear more than once in any half-hour period.

(b) No station or network may carry more than four minutes of commercial messages in any one half-hour of children's programming or more than an average of eight minutes per hour in children's programs of longer duration.

(c) In children's programs, only paid commercial messages are included in the four minutes per half-hour limitation. Promotions and public service announcements may occupy the time difference between the *Code* limit and the CRTC regulation limit. Broadcasters will, however, consider the appropriateness of the content of public service announcements before scheduling in children's programs.

(d) For the purposes of this section, the time devoted to the broadcasting of a children's program includes any time devoted to a commercial message that is inserted within the program and/or immediately adjacent to the end of the program and also includes any time devoted to a child-directed commercial message inserted between the end of the program and the beginning of the following program.

# The App Store Age Designations: iTunes App Store and Google Play

## iTunes App Store age classifications are inaccurate and misleading

It's important to note that the audience age attached to apps in the iTunes App Store is not a fair or accurate assessment of the audience being targeted. As it currently exists, Apple's menu of content descriptions serves more as a reflection of the *risk* of content than recommended audience.

### Ratings Overview

Developers have the following age categories to choose from in assessing the content of their app: "4+" to "9+" to "12+" to "17+" or "No Rating." Developers must answer 10 questions and categorize the content of their app based on the options of "None", "Infrequent/Mild", or "Frequent/Intense." Their responses determine the age rating in the upper right corner. Developers who don't provide a rating get a warning stating: "This content will not be sold via iTunes." The final two questions in the ten-question matrix are clearly key for Apple, as they try to ensure the App Store remains free of questionable content.

### Apple App Store content descriptors:

- Cartoon or Fantasy Violence
- Realistic Violence
- Sexual Content or Nudity
- Profanity or Crude Humor
- Alcohol, Tobacco, or Drug Use or References
- Mature/Suggestive Themes
- Simulated Gambling
- Horror/Fear Themes
- Prolonged graphic or sadistic realistic violence
- Graphic sexual content and nudity

## **Play Stores: Google Play**

### **Application Content Ratings**

Google Play provides an assessment of content choosing to stay away from a recommended user age or stage. There's not much here to help parents evaluate the developmental suitability of an app. What is of value, however, is how location based information is handled at the various rating levels.

#### **Everyone**

Applications in this category should not collect user's location data or contain objectionable material. Applications should not share user content or include social features.

#### **Low maturity**

Applications in this category may include instances of mild cartoon or fantasy violence or other potentially offensive content. Applications may collect user location data for the purpose of providing location specific information or otherwise improving the user experience, but should not share the data with other users. Applications may include some social features but should not focus on allowing users to find and communicate with each other.

#### **Medium maturity**

Applications in this category may include sexual references; intense fantasy or realistic violence; profanity or crude humor; references to drug, alcohol and tobacco use; social features and simulated gambling. Applications may collect user location data for the purpose of sharing or publishing with the user's consent.

#### **High maturity**

Applications in this category may focus on or include frequent instances of sexual and suggestive content; graphic violence; social features; simulated gambling; and strong alcohol, tobacco and drug references. Applications may collect user location data for the purpose of sharing or publishing with the user's consent.

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