

It's Not Child's Play: The Online Invasion of Children's Privacy

Valerie Steeves*

PRIVACY LAWS BASED ON FAIR INFORMATION PRACTICES have been ineffective in protecting children's online privacy because they are based on a narrow interpretation of Alan Westin's definition of privacy as informational control. Although Westin's original definition started with informational control, it continued to discuss privacy in the context of an interpersonal boundary. Similarly, Westin's original legislative program included fair information practices, but they were only the fifth step in a five-step process that first required organizations seeking to use surveillance to prove that the surveillance was socially appropriate. This paper seeks to reclaim these forgotten elements of Westin's work. It suggests that privacy is the boundary between the self and the other that is negotiated through inter-subjective communication. An examination of the ways in which commercial websites invade children's privacy demonstrates that this alternative conceptualization of privacy better enables legislators to protect children's privacy because it takes both their social experiences and their developmental needs into account, and frees the legislative debate from narrow issues of consent. This alternative conceptualization also helps to revitalize Westin's original legislative framework by bringing the purposes for surveillance into question.

LES LOIS RELATIVES À LA PROTECTION DE LA VIE PRIVÉE fondées sur les pratiques d'information justes n'assurent pas efficacement la sécurité des enfants en ligne parce qu'elles reposent sur une interprétation étroite de la définition de vie privée de Alan Westin en tant que contrôle de l'information. Bien que la définition originale de Westin parlait de la notion de contrôle de l'information, elle s'étendait à aussi à la vie privée dans le contexte des frontières interpersonnelles. Similairement, le programme législatif original de Westin englobait les pratiques d'information justes, mais en tant que cinquième élément d'une démarche en cinq points que devaient utiliser les organisations pour démontrer que la surveillance était socialement légitime. Cet article veut redonner vie aux éléments oubliés du travail de Westin. Il suggère que la vie privée est la frontière entre le moi et les autres qui se négocie par la communication intersubjective. Un examen de la façon dont les sites Web commerciaux envahissent la vie privée des enfants révèle que cette nouvelle conceptualisation de la vie privée permet aux législateurs de mieux protéger la vie privée des enfants parce qu'elle tient compte à la fois de leurs expériences sociales et de leurs besoins de développement, se qui écarte du débat législatif les questions étroites de consentement. Cette nouvelle conceptualisation aide également à revitaliser le plan législatif original de Westin en remettant en question les raisons d'être de la surveillance.

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They're going to slap that baby's bottom, then slip an ID chip in their neck or between their shoulders so you can keep track of your kid.

—Sun Microsystem CEO Scott McNealy

1. INTRODUCTION

IN THE EARLY 1990S, Canada committed itself to networked communications in order to remain competitive in the emerging information marketplace.¹ As part of that economic agenda, the federal government had wired every public school in the country to the internet by the end of the decade.² Remarkably, three years later, seventy-three percent of households with children were also connected to the internet, a figure which is almost twenty percentage points higher than the percentage of wired Canadian households in general.³ By 2005, over one-third (thirty-seven percent) of children in grades 4 to 11 accessed the internet from their own computer, as opposed to a communal family machine.⁴

Canadian kids are now among the most wired in the world. Shade, Porter and Santiago argue that the internet has become a domestic utility for

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1. The ACT Cinemage Group, "Manley Announces Information Highway Advisory Council Members" *ACT Newsletter* vol.1 (May 1994), <<http://www.cinimage.com/news1/may1994/highway.html>>; Canada, Trilateral Commission in Washington, *Canada and the Internet Revolution: Connecting Canadians* (1999), <<http://www.trilateral.org/annmtgs/trialog/trlgtxts/t53/man.htm>> [*Canada and the Internet Revolution*].
 2. *Canada and the Internet Revolution*, *ibid.*
 3. Statistics Canada, *Household Internet Use Survey, 2003* (8 July 2004), <<http://www.statcan.ca/Daily/English/040708/d040708a.htm>>.
 4. Media Awareness Network, *Young Canadians in a Wired World, Phase II: Student Survey* (November 2005), <http://www.media-awareness.ca/english/research/YCWWII/phaseII/upload/YCWWII_Student_Survey.pdf>.

many Canadian households, alongside television, radio and newspapers.⁵ Parents have encouraged their children to use the internet because they believe that it will help them succeed at school and prepare for the workplace,⁶ but children overwhelmingly see the internet as a place to play and socialize.⁷ And overwhelmingly, they are playing and socializing on commercial sites that are designed to generate profit by playing on those children's developmental needs.

This paper examines how well the current legislative framework has protected children's privacy. I argue that privacy laws have been ineffective for three reasons. First, the consent-based mechanisms they rely upon are easy to circumvent online. Second, current laws are limited because they fail to take young people's experiences and social needs into account. And third, by focusing on procedural rules, privacy laws have constrained the potential for a broader debate on the social value of embedding surveillance into children's private spaces.

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2. CONCEPTUALIZING PRIVACY

TYPICALLY, WHEN WE TALK ABOUT PRIVACY, we start with the definition set out by Alan Westin in 1967 in his seminal study, *Privacy and Freedom*:⁸ "Privacy is the claim of individuals, groups, or institutions to determine for themselves when, how, and to what extent information about them is communicated to others."⁹

Westin worried that "disappointing" legislative and common law responses¹⁰ to the technological challenges of the 1960s had failed to restrain surveillance,¹¹ so he articulated a set of fair information practices that were designed to provide the individual with some control over the collection, use and disclosure of his or her personal information.

5. Leslie Shade, Niki Porter & KS Santiago, "Everyday Domestic Internet Experiences of Canadian Youth and Children" (Paper presented at *Digital Generations—Children, Young People and New Media*, London, 26-29 July 2004) [Shade, Porter & Santiago, "Everyday Domestic Internet Experiences"].
6. Katherine Allen & Lee Rainie, "Parents Online" *Pew Internet & American Life Project* (November 2002), <http://www.pewinternet.org/pdfs/PIP_Parents_Report.pdf>; Media Awareness Network, *Canada's Children in a Wired World: The Parents' View* (2001) <http://www.media-awareness.ca/english/resources/special_initiatives/survey_resources/parents_survey/upload/Canada-s-Children-In-A-Wired-World-The-Parents-View-Final-Report-PDF.pdf> [Parents' View].
7. Barrie Gunter et al., "The British Life and Internet Project: Inaugural Survey Findings" (2003) 55:4 ASLIB Proceedings 203 [Gunter et al., "British Life"]; Stephen Kline & Jackie Botterill, *Media Use Audit for BC Teens: Key Findings* (Media Analysis Laboratory, Simon Fraser University, May 2001), <www.sfu.ca/media-lab/research/mediasat/secondschool.pdf>; Joan Abbot-Chapman & Margaret Robertson, "Youth, Leisure and Home: Space, Place and Identity" (2001) 24:2 *Loisir et Société / Society and Leisure* 485 [Abbot-Chapman & Robertson, "Youth"]; Media Awareness Network, *Young Canadians in a Wired World: The Students' View* (2001), <http://www.media-awareness.ca/english/resources/special_initiatives/survey_resources/students_survey/yciww_students_view_2001.pdf> [Students' View].
8. Alan F. Westin, *Privacy and Freedom* (New York: Atheneum, 1968) [Westin, *Privacy and Freedom*].
9. *Ibid.* at p. 7.
10. *Ibid.* at p. 364.
11. *Ibid.* at p. 344.

Although Westin's work is remarkable for its comprehensiveness and often prophetic analysis of emerging privacy issues, its success as a legislative program is unparalleled. His set of fair information practices has been incorporated into law both internationally and at the domestic level in forty-three countries to date, and his definition of privacy as informational control continues to dominate the development of privacy policy. However, *Privacy and Freedom* contained a number of other policy recommendations that have not been incorporated by legislators. These "forgotten" prescriptions imply the law should provide some kind of oversight to ensure that the purpose for the surveillance is socially appropriate.

Westin suggested that there are five steps in such a process:

1. measuring the seriousness of the need to conduct surveillance;
2. deciding whether there are alternative methods to meet that need;
3. deciding what degree of reliability will be required of the surveillance instrument;
4. determining whether true consent to surveillance has been given; and
5. measuring the capacity for limitation and control of the surveillance if it is allowed.¹²

Fair information practices are only introduced at the last stage of the inquiry, and only come into play if the organization seeking to use surveillance first meets the burden to prove that the surveillance should be allowed.

The narrow definition of privacy as informational control has made it difficult for legislators to capture this broader inquiry. As Priscilla Regan argues, it puts the individual at odds with the social interest in surveillance.¹³ I suggest that it also implies that privacy is perfected by social withdrawal and lays the burden of maintaining a private sphere on an embattled individual who is confronted by demands for disclosure from all sides. But Westin's definition of privacy only started with informational control. His definition continued to say:

Viewed in terms of the relation of the individual to social participation, privacy is the voluntary and temporary withdrawal of a person from the general society The individual's desire for privacy is never absolute, since participation in society is an equally powerful desire. Thus each individual is continually involved in a personal adjustment process in which he balances the desire for disclosure and communication of himself to others....¹⁴

I would like to pick up that thread in Westin's thinking and offer a new conception of privacy as the negotiation of the boundary between the self and others that is negotiated through inter-subjective communication. From this perspective, privacy is no longer a feature of social isolation but is constructed by real social actors through inter-subjective communication. Since

12. *Ibid.* at p. 370.

13. Priscilla M. Regan, *Legislating Privacy* (Chapel Hill: University of North Carolina Press, 1995).

14. Westin, *Privacy and Freedom*, *supra* note 8 at p. 7.

communication is the process by which the self emerges and enters into relationships with others, privacy is placed at the centre of human identity and social interaction.

In the next section of this paper, I explore some of the websites which have been identified as favourites by children, and then examine the effectiveness of these two models—privacy as informational control and privacy as boundary between self and other—in analysing and addressing privacy issues.

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3. ONLINE PLAYGROUNDS

CHILDREN REPORT THAT they are drawn to commercial sites by the bells and whistles—the games, the movie clips, and the opportunity to communicate with their peers. These sites have been highly successful at attracting and retaining a large audience of young people. Candystand,¹⁵ for one, is popular with children between the ages of nine and seventeen.¹⁶ All of the games and contests on this site feature Lifesaver products. Children playing Mini Motocross, for example, select an avatar named for a Lifesaver flavour and get bonus points for picking up Lifesaver candies throughout the race.

Corporations like Kraft, which owns Lifesavers, are interested in kids because of their spending power. YTV's annual Tween Report indicates that Canadian children between the ages of nine and fourteen spend a total of CAD\$1.9 billion per year of their own money, and influence approximately CAD\$20 billion per year in family spending.¹⁷ Corporations seeking to capitalize on this market create websites that offer games, quizzes, chat environments, and advice in order to encourage children to provide their personal information, which can then be used to target the children with advertising. Typically, these children's sites play into their developmental needs in order to encourage kids to talk about themselves.¹⁸ For example, research indicates that older children use the internet to obtain independence from parents and family, to communicate with their peers, to try on new identities, and to express their opinions, so commercial sites provide plenty of opportunities to do so.¹⁹ Girls are particularly attractive to marketers because, unlike boys who use the internet primarily for entertainment and recreational purposes, their online use patterns predispose them to communication, sharing, and expressiveness.²⁰

Many popular girls' magazines, including *Seventeen*, *Cosmogirl*, *Teen*

15. <<http://www.candystand.com/>>.

16. *Parents' View*, *supra* note 6.

17. <<http://www.corusmedia.com/ytv/kidfluence/index.asp>>.

18. Susan Linn, *Consuming Kids: The Hostile Takeover of Childhood* (New York: The New Press, 2004) at p. 24 [Linn, *Consuming Kids*].

19. Valerie Steeves, *Young Canadians in a Wired World, Phase II: Trends and Recommendations* (Ottawa: Media Awareness Network, 2005), <http://www.media-awareness.ca/english/research/YCWW/phasell/upload/YCWWII_trends_recomm.pdf>.

20. Justine Cassell & Henry Jenkins, *From Barbie to Mortal Kombat: Gender and Computer Games* (Cambridge: MIT Press, 1998).

and YM, publish an e-version. The e-magazines mirror much of the content of the real world versions—horoscopes, contests, and articles on beauty, fashion, dating, and celebrities—and offer opportunities to interact and communicate through chat rooms, hotlinks to advertisers, online shopping links, advice columns, and email. The public nature of the internet means that the publishers can monitor the teens that come to the site and record their interests, preferences, communications, and behaviour. But to maximize the value of the information they collect, the magazines encourage the children to identify themselves by providing personal information. For example, Cosmogirl urges them to “Fill in a little info about yourself and you'll get instant access to the hottest parts of the site!”²¹

Many of these sites, like Tickle.com, use personality tests to collect information from, and market to, individual girls. These quizzes ask detailed questions about the child's personality, preferences, hopes, and aspirations. Since children have to register with the site before they can access the quizzes, the marketer is able to record the child's responses linked to his or her first and last name, zip/postal code, email address, gender, marital status (and whether he or she has children), and level of education. This information can also be matched against the data trail that the child generates as she surfs through the site, selecting articles, chatting online about boys and playing games.

Tickle also uses the information they collect to target girls with personalized advertisements. For example, the Media Awareness Network reports that after fourteen-year old Jenna took the “Ultimate Personality Test” on Tickle's predecessor, emode.com, she was told that she values her image, so Emode recommended that she visit e-diets, one of their advertisers, to “prep her body for success.”²²

Neopets is a popular site among tweens. Like other children's sites, Neopets encourages users to identify themselves. If a child tries to access a game or a contest without registering on the site, he or she will be told, “OOPS! YOU ARE NOT LOGGED IN! You are not currently logged into Neopets, so you will NOT be able to earn any Neopoints for playing this game (but it'll still be fun!) Either Log In, or Sign Up with Neopets and you can start earning Neopoints straight away!”²³ The site tells kids registering is “simple, fast and FREE!”²⁴ although the sign-up process involves accepting Terms and Conditions that are eighteen screens long, and the default setting on the sign-up form commits them to installing “GloPhone, so I can call anyone, anywhere for Free (GloPhone to GloPhone) right from my computer. Get 500 NP [Neopoints] for signing up!”²⁵

21. <https://auth.cosmogirl.com/registration/regPage?iv_arrivalSA=1&iv_cobrandRef=0&iv_arrival_freq=2>.

22. Valerie Steeves & Jane Tallim, *Kids for Sale: Online Marketing to Kids and Privacy Issues* (Ottawa: Media Awareness Network, 2003), <http://www.media-awareness.ca/english/teachers/wa_teachers/kids_for_sale_teachers/index.cfm> [Steeves & Tallim, *Kids for Sale*].

23. See e.g. <<http://www.neopets.com/games/destructomatch2.phtml>>.

24. <<http://www.neopets.com/>>.

25. <<http://neopets.com/signup/signup.phtml>>.

Children are also encouraged to sign up for Return Path: "Who might be looking for you at your old email address? Stay in touch with friends at your current e-mail. Enter your old e-mail address to register for Return Path's free service. Get 250 NP for signing up!"²⁶ Return Path is a corporation that helps email marketers "[navigate] the ever-changing email landscape. Our solutions protect brands, increase efficiency, and improve results.... Return Path helps you [the email marketer] increase ROI [Return On Investment] by continually improving your email communications."²⁷

Once a child creates a virtual pet to play with on Neopets, they have to earn Neopoints to pay for food and toys for the pet. They do that by filling in market surveys that ask detailed questions about their preferences. One survey visited by the Media Awareness Network in 2002 focused on food and asked kids about their:

1. favourite chocolate bars and cereal brands;
2. breakfast habits;
3. name, age, gender and email address;
4. education level;
5. country and zip code;
6. ethnic background; and
7. internet use.

It also asked children to select things that interested them from sixty items, including gambling, cigars, beer and liquor.²⁸

The seamless blend of commercial content, entertainment and play on children's sites also provides an opportunity to disguise marketing as empowerment. The zip4tweens site is designed for "'tween' kids—not quite teens but definitely not children!"²⁹ and tells its visitors that, "We're here to help you have fun—and build a strong mind and body."³⁰ In the Parents Section of the site, it states,

The zip4tweens.com Website is designed to help tween girls (about 8 to 12 years old) see the value of eating smart and being physically active. Content and activities on the site can also help them feel good about themselves and confident in what they can accomplish both physically and mentally.³¹

But if one reads the fine print at the bottom, one sees that the site is owned by the Cattlemen's Beef Board, the National Cattlemen's Association and Circle 1 Network. The Circle 1 Network:

... specializes in marketing to kids and tweens, and marketing to families through interactive strategies including educational games, games for kids, online promotions, edutainment and advergaming. We publish properties for

26. <<http://neopets.com/signup/signup.phtml>> (click on link "My age is 13 to 17").

27. <<http://www.returnpath.net/>>.

28. Steeves & Tallim, *Kids for Sale*, *supra* note 22.

29. <<http://www.zip4tweens.com>>.

30. *Ibid.*

31. <<http://www.zip4tweens.com/why.html>>.

kids of all ages, teens, tweens and parents that help with reaching and advertising to kids, and we help develop kid advertising.³²

The site is clearly a marketing tool designed to create product loyalty among girls who have embraced vegetarianism in record numbers.³³ As tweens talk together about "popularity, dating, and more" in the chat areas,³⁴ play games like "Burger Boggle"³⁵ and "Grillin' and Chillin'," or "go to the party zone to make invitations for [their] next burger birthday bash,"³⁶ they are surrounded by marketing messages about beef. For example, ZIP (which stands for Zinc, Iron and Protein) is the only game on the site that does not incorporate images of hamburgers. However, girls must answer trivia questions such as, "Which of the following is one of the best dietary sources of iron? (A) Beef (B) Metal (C) Crunching on tin cans (D) Cotton candy." If the child clicks on (B), (C) or (D), the program laughs. After the child selects (A) for beef, the screen flashes, the program plays exciting, prize-winning music, and the child advances to the next level of the game.³⁷ When the game is over, the child is told:

Now that you've conquered the Zonks by energizing the Zips, how about giving yourself more energy? Did you know that the nutrients contained in the foods you eat give you energy? Who wants to be tired all the time—so, think energy when *choosing your favorite foods, like tacos, spaghetti and hamburgers*. Next time you're looking for something to eat, think about foods that give you these key nutrients: [Zinc, Iron and Protein].³⁸

Beef tops the list of preferred foods in each category.

In a similar vein, the site's Smart Eatin' section provides seventeen recipes for things like Beef on Bamboo and Easy Beef Chill. Fourteen of the recipes feature beef or dairy products; the remaining three are fruit, salad or tomato-based recipes and do not include any competing meat products, like chicken or fish.³⁹ In the Smart Eatin' section, Swap Out of the Ordinary, kids are told:

After the millionth tuna sandwich for lunch, turn to lean beef instead! Beef has nutrients like zinc, which improves your memory and helps you grow. Just three ounces of roast beef has the same amount of zinc as almost 35 ounces of canned tuna!⁴⁰

32. <<http://www.circle1network.com/>>.

33. Girls Incorporated (1994), an American non-profit youth organization, tells the girls who visit its site that, "Vegetarianism is no passing fad. According to the Vegetarian Resource Group, the number of vegetarians is on the rise. In fact, the organization estimates that one million school-age kids have adopted a meat-free diet!" Girls Inc. encourages girls to "make an informed decision," and identifies non-meat sources of iron and protein.

34. <<http://www.zip4tweens.com>>, accessed January 2005.

35. Burger Boogle is a Hangman-type game where kids spell out words like "Kebobs" and "Hamburger." Incorrect answers mean you lose a layer of your hamburger. See <<http://www.zip4tweens.com/funandchat/games/games.html>>.

36. <<http://www.zip4tweens.com>>, accessed January 2005.

37. <<http://www.zip4tweens.com/funandchat/games/zip/zip.html>>.

38. <http://www.zip4tweens.com/funandchat/games/zip/movies/zip4u_pop-up.html> (emphasis added).

39. <<http://www.zip4tweens.com/along/snackin/smart.html>>.

40. <http://www.zip4tweens.com/along/snackin/swap_out.html>.

The section also advises them that people who think turkey has less fat than beef are wrong, and chicken provides less zinc, iron and vitamin B-12 than beef.⁴¹

Online marketers, like the Beef Board and Circle 1 Network, typically encourage children to play with products in order to create a “personal relationship” between the child and the product. This is particularly true of brands.⁴² The Barbie site provides girls with an opportunity to design and dress their own Barbies, do a Barbie make-over, sing along with Barbie as she sings “Friends like we are” to the child, or “Make Happy Family Memories” with Barbie’s “friends” Alan, Midge, their son Ryan, Midge’s parents, and Midge’s new baby (whom the child gets to name when she fills out the Birth Certificate).⁴³ The site actively encourages girls to buy Barbie products. For example, each child can record their purchasing preferences in their “Wish list,” and email it to their parents.⁴⁴ As Barbie says:

Making your wish list is easy and fun! Here’s everything you need to know:

1. Click on Find More Faves below and look through all the great things in the world of Barbie.
2. When you see something you really like, click to add it to your wish list.
3. When you’re done shopping, you can print your wish list, email it to family or friends, or save it for later.⁴⁵

Barbie.com also uses the information they collect from girls to market directly to parents. In their February issue of *For Parents*, they used quotes they collected from girls about what makes them anxious, and then told parents that creative play relieves children’s anxieties. The article concluded with a list of Barbie products that can help their children feel less anxious.⁴⁶

But the site incorporates more than a sales pitch—it reinforces the “friendship” between the child and the brand itself. After taking a car trip into the city to help Cali (a doll) get ready for a party, the screen tells her, “We’re totally glad your chillin’ with our Cali girl crew!” For US\$1.99, Barbie can also step out of the website and call the child directly on the phone. The site tells girls, “Wow! You could get a call from *your best friend—Barbie!*” (emphasis added). For American Thanksgiving 2004, Barbie told the girls in audio, “Hi! It’s Barbie! I think this is such a special time of year. Don’t you? I’ve got a wonderful wish for you. I’d love to call you and tell you! Or just say Hello. Ask your mom or dad if it’s okay. Oh, I hope to talk to you soon!” Barbie will also call to wish them Happy Birthday, invite their friends to a party at their house, or tell them a bedtime story.⁴⁷

41. *Ibid.*

42. Martin Lindstrom, *BRANDchild: Remarkable Insights into the Minds of Today's Global Kids and Their Relationships with Brands* (London: Kogan Page, 2003).

43. <<http://www.barbie.everythinggirl.com>>.

44. <http://barbie.everythinggirl.com/giftguide/hgg_2005/>, accessed January 2005.

45. *Ibid.*

46. <<http://barbie.everythinggirl.com/parents/>>, accessed January 2005.

47. <<https://secure.uvoxnetworks.com/barbiephone/affhome.html?affno=13>>.

Through interacting with a product in a web environment, children learn to "trust" brands like Barbie and consider them their "friends."⁴⁸ However, these virtual friends go beyond recommending product; they become role models for the child to emulate, in effect embedding the product right into the girl's identity. For example, when girls visit the "Hanging Out with Hilary Duff" page on Barbie.com, they can listen to an interview with Duff in which she discusses makeup, clothes and Barbie. But the most interesting part of the interview for our purposes is how Duff talks about Barbie as if she is a real person. She says:

I was the biggest Barbie fan when I was younger, and I still admit I love Barbie. I just think that she's so pretty, and she's so motivated. She's had a lot of jobs. I think she's a really good, positive role model for young girls to look up to.... And I always looked up to Barbie when I was younger, and I think that she's such an inspiring, cool, hip, and trendy role model for girls to look up to, so I'm very excited. And she loves pink—just like me!⁴⁹

The Duff interview is part of a marketing campaign that blurs the line between child and doll. In the winter of 2005, girls who went to the log-in page were greeted by a music video that features a number of girls getting ready for a Hilary Duff concert. The video goes back and forth between images of real girls and images of Barbies and, at many points, it is hard to tell which is girl and which is doll. The girls are shown emulating Barbie's clothes, hair, and style—in effect reconstructing their sense of self to conform to the brand. At one point, a particular skirt is literally transferred from a Barbie doll to one of the girls during a series of quick scene changes. At the end of the video, the girl wearing the skirt is rewarded with Hilary Duff's attention, when she asks her, "I love your skirt! Where did you get that?"

Websites like Barbie.com that encourage children to identify with branded products have proven to be an excellent way to engage young people. Forrester Research projects that the advergames industry will be worth over US\$1 billion per year by 2005. But branded game environments are not restricted to dolls and candy. Many advergames seek to create product loyalty between children and adult products, such as cars, gambling, and alcohol. Lifesaver's Candystand, for example, includes Video Poker and Poker Puzzler. In the first, children bet credits on hands which are dealt in a slot machine environment. When they win, they hear the sound of coins clinking as the number of credits increases. Poker Puzzler is another casino-style game. The cards are dealt onto a casino table and the computer plays lounge music while the children play. When they win, they hear slot machine sounds.⁵⁰

Beer.com is an industry site designed to create product loyalty for beer in pre-teen and teenaged boys. It combines games, music, sports, party talk,

48. *Parents' View*, *supra* note 6; Media Awareness Network, *Young Canadians in a Wired World: Phase II Focus Groups* (Ottawa: 2004) <http://www.media-awareness.ca/english/research/YCWW/phasell/upload/YCWWII_Focus_Groups.pdf> [Focus Groups].

49. <<http://barbie.everythinggirl.com/activities/btv/hilary/fall/>>.

50. <<http://candystand.com>>.

chat, and advice with erotic, sexualized images of young women. Like sites aimed at girls, Beer.com tells boys to:

Join now and get access to the best on the Web for free! The Pub Club is where we keep Beer.com's premium content. You'll find beer.com's famous Beer Girls, contests, incredible features, the best beer ads, and other awesome vids. And when we create something unbelievably cool, you'll find it in the Pub Club.

Encouragements to join up are embedded in the site. For example, visitors are advised to, "Log-in to see two girls kissing and a bunch of other kickass beer ads." To register, users provide their name, email address, age, gender, country, and zip/postal code, and answer the question, "How many beers do you drink per week?" by selecting 0, 1 to 2, 3 to 6, 7 to 12, or 13+.⁵¹

One of the most popular functions on beer.com is Tammy the virtual bartender. Tammy is an interactive video who responds to "orders," including "take off your clothes" and "kiss a girl." By joining the Virtual Bartender Fan Club, kids can be "the first on your block to get the latest beer.com and VB updates, [including] secret commands [...] and more."

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4. LEGAL FRAMEWORKS TO PROTECT CHILDREN'S ONLINE PRIVACY

IN THE MID 1990S, public attention became focused on the issue of electronic marketing databases after a number of investigative reports demonstrated how easily strangers could buy information from marketers to locate individual children.⁵² In 1996, the Center for Media Education (CME) published its report, *Web of Deception: Threats to Children from Online Marketing*.⁵³ The report documented, for the first time, the types of privacy-invasive practices embedded in commercial websites targeted at children. The CME argued that young children cannot differentiate between online content and advertising and do not understand the consequences of revealing their personal information to marketers. Accordingly, the CME called for regulation to protect children's online privacy.⁵⁴

American legislators responded within months. However, from an early point in their inquiry, the issues were redefined in terms of fair information practices, and questions about the potential harm that flows from commercializing child's play were dropped from the debate. When the Electronic Privacy Information Center (EPIC) testified before Congress in September 1996, they called for the introduction of fair information practices, arguing that "current practices, which ignore standard privacy procedures

51. <http://www.beer.com/beer.com-Content_C-section_wot.html>.

52. Electronic Privacy Information Center, *The Children's Online Privacy Protection Act (COPPA) Page*, <<http://www.epic.org/privacy/kids>> [EPIC, COPPA].

53. Center for Media Education, *Web of Deception: Threats to Children from Online Marketing* (Washington, DC: 1996).

54. Kathryn Montgomery, *teensites.com* (Washington, DC: Center for Media Education, 2002).

followed in other industries and other market sectors, pose a substantial threat to the privacy and safety of young people."⁵⁵ The CME supported this approach as well.⁵⁶ The Federal Trade Commission conducted an inquiry and, in March of 1998, testified before Congress in favour of a data protection model.⁵⁷ Four months later, Senators Richard Bryan and John McCain introduced a bi-partisan bill and on 21 October, the *Children's Online Privacy Protection Act of 1998* (COPPA) was enacted.⁵⁸

COPPA applies to operators of commercial websites directed at children that collect personal information from children under the age of thirteen and requires that they obtain "verifiable" parental consent before collecting information from a child.⁵⁹ Typically, this means that the operator must make reasonable efforts to provide a parent with notice of its information collecting practices and ensure that a parent consents to the collection of the information on that basis. However, the FTC states that "if the operator uses the information for internal purposes, a less rigorous method of consent is required. If the operator discloses the information to others, the situation presents greater dangers to children, and a more reliable method of consent is required."⁶⁰ Internal purposes include "marketing back to a child based on his or her preferences or communicating promotional updates about site content."⁶¹ In Canada, there is no legislation that deals specifically with children's privacy; however, the Office of the Privacy Commissioner has indicated that consent for a minor, for the purposes of the *Personal Information Protection and Electronic Documents Act* (PIPEDA),⁶² may be obtained from a legal guardian.⁶³

Both COPPA and PIPEDA seek to protect privacy by providing parents (and children over thirteen in the United States) with more control over the collection, use and disclosure of their personal information, in keeping with Westin's definition of privacy as informational control.⁶⁴ The assumption is that if parents know how their children's information is being treated and are given an opportunity to consent, they will be able to protect their children from invasive practices. However, Turow indicates that most adults do not understand the

55. Electronic Privacy Information Center, *Testimony and Statement for the Record of Marc Rotenberg, director Electronic Privacy Information Center on the Children's Privacy Protection and Parental Empowerment Act, H.R. 3508 Before the House of Representatives, Committee on the Judiciary, Subcommittee on Crime*, 12 September 1996, <http://www.epic.org/privacy/kids/EPIC_Testimony.html> [EPIC, *Testimony*].

56. *Ibid.*

57. EPIC, *Testimony*, *supra* note 55.

58. 15 U.S.C. ss. 6501–6506 (2000), <<http://uscode.house.gov/download/pls/15C91.txt>> [COPPA].

59. US, Federal Trade Commission, *How to Comply with the Children's Online Privacy Protection Rule*, <<http://www.ftc.gov/bcp/online/pubs/buspubs/coppa.htm>>.

60. *Ibid.* at p. 2.

61. *Ibid.* at p. 1.

62. *Personal Information Protection and Electronic Documents Act*, S.C. 2000, c. 5, <<http://laws.justice.gc.ca/en/p-8.6/>> [PIPEDA].

63. *Ibid.*, s. 4.3; Canada, Office of the Privacy Commissioner of Canada, *A Guide for Businesses and Organizations: Your Privacy Responsibilities* (Ottawa: Public Works and Government Services Canada, 2003), <http://www.privcom.gc.ca/information/guide_e.asp> at p. 9.

64. Westin, *Privacy and Freedom*, *supra* note 8.

ways in which personal information is collected and used, even if they read a site's privacy policy. According to his research, fifty-seven percent of adults assume that if a site has a privacy policy posted, the site operators will not disclose their personal information to other organizations, even in cases where the policy states it will.⁶⁵ Two-thirds of people who believe that privacy policies are easy to understand also believe that their information will not be shared.⁶⁶ Turow warns us that:

... the overwhelming majority of US adults who use the internet at home have no clue about data flows—the invisible, cutting edge techniques whereby online organizations extract, manipulate, append, profile and share information about them. Even if they have a sense that sites track them and collect individual bits of their data, they simply don't fathom how those bits can be used. In fact, when presented with a common way that sites currently handle consumers' information, they say they would not accept it.⁶⁷

Most children, on the other hand, report that they do not read privacy policies because the policies are "long and boring."⁶⁸ Even if they do, it is very easy for them to avoid provisions that require the site operator to obtain parental consent. Many sites, like Neopets and Candystand, are programmed to ask for the child's age. Once a child self-identifies as younger than thirteen, the child is prompted to provide the site with an email address for a parent. However, by returning to the registration page and changing his or her date of birth, the child can then register and proceed to play on the site. The only way to avoid this loophole would be to create a reliable method of authentication. However, as the Electronic Privacy Information Center points out, this would mean that every user would have to declare his or her age in order to prove he or she was not a child, paradoxically destroying the possibility of anonymous surfing for adults as well as children.⁶⁹

Current legislative frameworks, then, have been ineffective at protecting children's online privacy. I suggest that this is primarily because they ask the wrong question: How can we give kids and their parents control over their personal information? The more important questions to ask have to do with the social consequences of treating kids as fair game in a market economy that is based on commodifying their privacy.

Surveillance is now built into the social environments in which children play, learn and, socialize. Students attending the Venerable Bede High School in Sunderland, England submit to iris scans when they pick up their food from the cafeteria and take out books from the school library.⁷⁰ Enterprise Charter School in Buffalo, New York requires students and staff to carry a radio-frequency identification chip which controls their access to the school and monitors their

65. Joseph Turow, *Americans and Online Privacy: The System is Broken* (Philadelphia: Annenberg Public Policy Center of the University of Pennsylvania, 2003), <http://www.annenbergpublicpolicycenter.org/04_info_society/2003_online_privacy_version_09.pdf> at p. 3.

66. *Ibid.*

67. *Ibid.*

68. *Focus Groups*, *supra* note 48.

69. EPIC, *COPPA*, *supra* note 52.

attendance.⁷¹ CCTV cameras are common in schools across Canada, and children have even had to submit to breathalyzers to get into school dances.⁷² The online environment works to naturalize these kinds of surveillance because it trains children at an early age to identify themselves and allow themselves to be monitored. As fair information practices have been built into business networks, corporations have in effect constructed a social environment for children that open up their private lives in unprecedented ways and structure their social interactions for profit. At the same time, data protection has constrained the potential for a broader debate on the social value of aggressive online marketing to children by misdirecting the attention of policy makers to narrow questions of procedure.

Proponents of fair information practices often lament that they are unable to protect kids because they do not seem to care if their privacy is invaded.⁷³ However, a closer examination of children's online behaviour reveals a more complex set of dynamics. Recent studies have indicated that online privacy is an active concern for children, particularly in the context of their social relationships with concrete others in their immediate social networks. Abbott-Chapman and Robertson's study of Australian teens found that young people's online and offline activities focus mainly on "friendship building in the immediate locale."⁷⁴ Furthermore, Gunter reports that the internet has emerged as an important way for kids to stay in touch and gossip with family and friends.⁷⁵ Livingstone and Bober surveyed 1,511 British children between the ages of nine and nineteen and concluded that, "[w]hile often naive about threats to their privacy from external sources, children are fiercely protective of their privacy in relation to their parents."⁷⁶ Just over two-thirds (sixty-nine percent) of the survey participants said they minded if their parents restricted or monitored their internet use, and reported taking steps to protect their online privacy from family members.⁷⁷

Qualitative interviews found that children equated online monitoring by their parents to having their pockets searched or being stalked.⁷⁸ Older teens especially reported that they had a right to their privacy and their privacy should

70. John Leyden, "UK School Plans Retinal Scans in the Dinner Queue" *The Register* (8 January 2003), <http://www.theregister.co.uk/2003/01/08/uk_school_plans_retinal_scans/>.
71. Julia Scheeres, "Three R's: Reading, Writing and RFID" *Wired News* (24 October 2003), <<http://www.wired.com/news/technology/0,1282,60898,00.html>>.
72. Craig Albrecht, "Magrath May Have to Face Breathalyzer" *Lethbridge Herald* (9 October 1998), <http://www.marijuananeews.com/marijuananeews/cowan/canadian_high_school_requires_ra.htm>.
73. *Students' View*, *supra* note 7.
74. Abbot-Chapman & Robertson, "Youth," *supra* note 7 at p. 485.
75. Gunter *et al.*, "British Life," *supra* note 7 at p. 203.
76. Sonia Livingstone & Magdalena Bober, *UK Children Go Online: Listening to Young People's Experiences* (London: Economic and Social Research Council, 2003), <<http://www.lse.ac.uk/collections/children-go-online/UKChildrenGoOnlineReport1.pdf>> at p. 4 [Livingstone & Bober, *UK Children Go Online*].
77. Sonia Livingstone & Magdalena Bober, *UK Children Go Online: Surveying the Experiences of Young People and Their Parents* (London: Economic and Social Research Council, 2004), <<http://personal.lse.ac.uk/bober/UKCGOsurveyreport.pdf>> at p. 46.
78. Livingstone & Bober, *UK Children Go Online*, *supra* note 76 at p. 26.

be respected: "You just like don't want your mum spying on you and knowing everything about you," and "[b]ecause you want your independence, really, you don't want your mum looking over your shoulder checking what you're doing all the time."⁷⁹

Children also consciously select from various media in order to regulate their privacy and manage their relationships with others.⁸⁰ Particularly because networked communication removes children from embodied, face-to-face, interaction, children feel a greater sense of control over how they present the self to others within their immediate social network when they use mediated communication such as text messaging or instant messaging.⁸¹ Shade reports that MSN makes children feel more confident and is perceived to be "less scary" than other forms of conversation.⁸² Oksman & Turtianinen note that, "A less than successful attempt at this type of communication can easily be passed over by referring to the playful quality of text messaging, thus, to employ the Goffmanian term, elegantly withdrawing from the stage."⁸³ Livingstone's work supports this conclusion; she reports that "talking in a private online space enabled friends to be more open with each other, an important factor in girls' friendships. Face-to-face communication, in this context, is too visible and, thus, subject to peer pressure."⁸⁴ For both boys and girls, the Net creates "a protective distance which enables them to think more about what they are going to say and avoid embarrassing situations that would occur on the telephone or face-to-face."⁸⁵ Accordingly, children prefer to use email to exchange secrets because it is more private since no one can overhear the conversation, and text messaging is considered to be as private as a letter for the same reasons.⁸⁶

Children's construction of online privacy is also implicated in the development of their sense of identity. Teens in particular seek out private spaces "in the search for private places in which to withdraw and reflect [and] ... private spaces for safe seclusion or group activities with close friends as part of the process of construction of self as a reflexive and symbolic project."⁸⁷ Their use of media is dialectical and intricately involved in identity formation.⁸⁸ Indeed, children report they consciously "pretend to be someone else" online in order to "try on" different identities and to gain access to an otherwise closed adult world.⁸⁹

79. *Ibid.* at p. 27.

80. *Ibid.*; Virpi Oksman & Jussi Turtianinen, "Mobile Communication as a Social Stage: The Meaning of Mobile Communication Among Teenagers in Finland" (2004) 6:3 *New Media and Society* 319 [Oksman & Turtianinen, "Mobile Communication"]; *Students' View*, *supra* note 7.

81. Oksman & Turtianinen, "Mobile Communication," *ibid.*; Shade, Porter & Santiago, "Everyday Domestic Internet Experiences," *supra* note 5.

82. Shade, Porter & Santiago, "Everyday Domestic Internet Experiences," *supra* note 5.

83. Oksman & Turtianinen, "Mobile Communication," *supra* note 80 at p. 326.

84. Livingstone & Bober, *UK Children Go Online*, *supra* note 76 at p. 18.

85. *Ibid.* at p. 19.

86. *Ibid.* at p. 18; Oksman & Turtianinen, "Mobile Communication," *supra* note 80 at p. 326.

87. Abbot-Chapman & Robertson, "Youth," *supra* note 7 at p. 506.

88. Jeanne R. Steele & Jane D. Brown, "Adolescent Room Culture: Studying Media in the Context of Everyday Life" (1995) 24:5 *Journal of Youth and Adolescence* 551; Oksman & Turtianinen, "Mobile Communication," *supra* note 80.

89. Livingstone & Bober, *UK Children Go Online*, *supra* note 76 at p. 16; *Students' View*, *supra* note 7.

An empathic reading of children's online experiences of privacy, therefore, supports a communication-based framework that explains privacy as a dynamic boundary mechanism that is an essential element of identity formation and inter-subjective communication. Young people's sense of privacy is inherently social; they do not experience privacy in an abstract way, but they feel invaded if and when their concrete interests in self-expression and social interaction are at stake within the context of their relationships with others in their immediate social networks. This is not dissimilar from adults who typically do not react to unreflexive monitoring of their behaviour until the invasion becomes visible, as it did in the case of the Canadian government's Longitudinal Labour Force File.⁹⁰ Once the invasion becomes concrete, it steps out of the background and people take action to reassert a more comfortable boundary between self and others.

Once privacy is seen as the boundary between self and other, the most troubling aspect of commercial sites targeting children is then the way in which web operators intentionally invade children's privacy to manipulate their sense of self for profit. The money at stake is substantial. Barbie alone generates over US\$1 billion per year in gross revenues for Mattel Incorporated.⁹¹

Dan Acuff, the president of Youth Market Systems, explains the relationship between children's identity and profit. He argues that to "maximize [the] opportunity for success" and create a "seismic impact on a company's bottom-line profits," corporations seeking to sell to children need:

... a thorough and integrated approach to product and product development that has *knowing the targeted consumer* at the core—knowing his/her brain development, needs, motivations, and wants, and the way he/she perceives the world.... Most central to this systematic approach is a deep and profound understanding of the underlying abilities, motivations, needs, and behaviors of the young target.⁹²

Marketer Rachel Geller bases her tips on how to market to children on "intensive work with psychologists" and encourages marketers to capitalize on teens' narcissism because, "Playing off teen insecurities is a proven strategy."⁹³

Psychologist Susan Linn concludes that "The marketing industry, with the help of psychologists, targets its campaigns to hook children by exploiting their developmental vulnerabilities—the ways that their cognitive, social,

90. In 2000, over 60,000 Canadians filed access to information requests when federal Privacy Commissioner Bruce Phillips announced Human Resources and Development Canada (HRDC) had created a super dossier on every individual Canadian. Due to public pressure, HRDC dismantled the file. See "Canada's Big Brother: HRDC and the Longitudinal Labour Force File," <<http://www.hackcanada.com/canadian/freedom/canadasbigbrother2000.html>>.

91. Dan S. Acuff, *What Kids Buy and Why: The Psychology of Marketing to Kids* (New York: Free Press, 1997) at p. 5.

92. *Ibid.*

93. Rachel Geller, "A Quantitative Look at the Best Brands," *Selling to Kids* (Potomac, Maryland: Phillips Publishing International, 1998) [Geller, "A Quantitative Look"].

emotional, and physical development influence decision making, likes, dislikes, interests, and activities."⁹⁴ For example, when Cosmogirl! asks girls, "Do you and your boyfriend have a problem you'd like help solving? If you're both willing to tell your side, we've got a therapist who can help! Tell us NOW!" they are intentionally playing upon teen's interest in advice in general and relationships in particular. The question is also surrounded by four flashing ads and, if girls choose to seek the therapist's advice, they first get a pop-up containing a fifth ad. The global firm Saatchi and Saatchi advises marketers to exploit tween's developmental need to belong by changing their "goal from selling a product to creating a hip, community experience" like the beef-friendly chat rooms and message boards on ZIP4tweens.com.⁹⁵ Online teen communities like Alloy and Bolt add a good helping of what marketers like to call "edge." Geller explains that, "Teens are more difficult because they are an oppositional subculture, interested in shutting out the adult world. However, there are enormous opportunities for the marketer who is able to understand both the reality and fantasy of teen life."⁹⁶ Beer.com's use of soft porn images and questionable sex advice is a clear example of playing to teenaged boys fantasies in order to build brand loyalty for an adult product.

From this perspective, the online invasion of privacy is not merely a question of collecting personal information from children without their, or their parent's, consent. Rather, it involves the opening up of the child's private world to the eye of the marketer, who not only watches the child but reconstructs the child's environment in order to manipulate the child's sense of self and security.

The massive collection of the minute details of children's online behaviour—their hopes and dreams, product preferences, crushes, or answers to questions like Cosmogirl's, "Have you ever taken a drug and had a bad experience?" or "What do you call your vagina?"⁹⁷—combine into a continuous feedback loop that provides marketers with ammunition to sell specific products to individual children, and to fine tune the child's online social environment to make the child more vulnerable to advertising messages. But the real problem with sites like Barbie is that they invade the child's privacy by artificially manipulating the line between the child's sense of self and other. By embedding consumer messages into what Mead calls the "organized community or social group which gives to the individual his unity of self," the sites try to steer the emergence of the self to facilitate a business agenda.⁹⁸

This kind of marketing raises serious questions about the nature of communication that is stripped of inter-subjectivity. It constitutes an invasion of privacy because the corporation penetrates the child's private spaces and

94. Linn, *Consuming Kids*, *supra* note 18 at p. 24.

95. *Ibid.* at p. 25.

96. See Geller, "A Quantitative Look," *supra* note 93.

97. Cosmogirl.com's talk to us page, <http://www.cosmogirl.com/talktous/archive/0,,_552,00.html>, accessed January 2005.

98. George H. Mead, *Mind, Self & Society: From the Standpoint of A Social Behaviorist* (Chicago: University of Chicago Press, 1934) at p. 154.

extracts data for instrumental purposes by manipulating the child communicatively. The interaction is, by definition, non-reciprocal; the child's words are captured by the watcher without the filter of inter-subjective interpretation. The child is no longer situated as a consumer interacting with a salesperson, but as a friend talking to a friend, and the boundary between roles—friend, consumer, anonymous member of civil society—collapses.

Westin, using language that resonates with a communicatively based understanding of the emergence of the self, warns that this kind of invasion can have serious consequences on the development of a child's identity:

... what information about an individual is put in his files becomes part of his estimate of himself; it is how the wise and the powerful forces in his life see him. It takes a very strong personality, especially among children being recorded in the new information-worshipping society, to reject or fight the recorded judgment of who he or she "is." (Part of the value of privacy in the past was that it limited the circulation of recorded judgments about individuals, leaving them free to seek self-realization in an open environment).⁹⁹

Fair information practices are unable to protect this type of self-realization because they do not inquire into the social validity of the purposes for which data is collected. But a communicatively based understanding of privacy connects information practices to social consequences because it recognizes that privacy is tied to the formation of identity and healthy social relationships. This perspective reinvigorates Westin's legislative programme because it enables policy makers to confront the ways in which privacy invasions reconstitute the social environment.

Once the broad-ranging impact of invasive marketing techniques on the development of a child's identity and social relationships is brought into the privacy debate, it becomes much easier to conclude that that form of surveillance is not socially appropriate. It is no longer a question of tinkering with process, but of coming to social judgment about substance. Current pressures to strip the veil of online anonymity and authenticate the identity of users are rooted in the desire to promote efficiency and security. However, the questions around children's online privacy remind us that there is value in maintaining infrastructures that allow for anonymous interaction.

At a practical level, this means that consent alone is not sufficient to legitimize the types of surveillance which are currently embedded in children's online play spaces. We have to lift the veil of data protection and seek to design mechanisms that hold to account corporations that use manipulative and deceptive trade practices, whether or not they first obtain parental consent to the collection of personal information. Consumer protection legislation provides one model for regulating practices such as persistent user registration, the blurring of the line between content and advertising, and market research

99. Westin, *Privacy and Freedom*, *supra* note 8 at p. 323.

initiatives that are disguised as playing.¹⁰⁰ The Quebec *Consumer Protection Act* has gone so far as to ban television advertising directed at children under the age of thirteen; a similar ban on the collection of children's personal information may be the best way to protect kids from invasive online practices.¹⁰¹ However, we can only engage in the debate over the appropriate level of regulation once we move beyond data protection and look behind consent to evaluate the social effect of the surveillance itself.

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5. CONCLUSION

THINKING OF PRIVACY AS THE BOUNDARY between self and other allows us to do this because it provides policy makers with a stronger understanding of the sociality of privacy and the social consequences of invasion. This approach refocuses the debate on Westin's primary legislative question—is surveillance socially appropriate?—and reconnects the law to the meaning of privacy as it is lived by real social actors in the real world. Good privacy policy must be sensitive to children's developmental needs, *including* their need for privacy and the role that privacy plays in fostering trusting relationships with others. Rather than focusing on narrow issues of parental consent, policy informed by a communicatively based framework can begin to explore the social impact of invasive practices and seek to structure both the online and the offline environment in ways that will promote the social and democratic meaning of privacy.

100. Although cross-jurisdictional issues will continue to complicate the issue, there is already a degree of harmonization between Canadian and American consumer protection legislation which may provide a framework for this type of regulation. Self-regulatory codes such as the Canadian Association of Broadcasters' *Broadcast Code for Advertising to Children* and the *Self-Regulatory Guidelines for Children's Advertising* drafted by the Children's Advertising Review Unit of the American Council of Better Business Bureaus also provide an opening dialogue. See Advertising Standards Canada, *The Broadcast Code for Advertising to Children* (Canadian Association of Broadcasters, 2004), <<http://www.cca-kids.ca/adult/ethics/KidsCode.pdf>>; Children's Advertising Review Unit, *Self-Regulatory Guidelines for Children's Advertising* (New York: Council of Better Business Bureaus, 2003), <<http://www.ftc.gov/os/comments/FoodMarketingtoKids/516960-00055.pdf>>.

101. See *Consumer Protection Act*, R.S.Q. 1987, P-40.1, <http://www2.publicationsduquebec.gouv.qc.ca/dynamicSearch/telecharge.php?type=2&file=/P_40_1/P40_1_A.html>, ss. 248, 249, 364; the constitutionality of the Quebec *Consumer Protection Act* was upheld by the Supreme Court of Canada in *Irwin Toy Ltd. v. Quebec (Attorney General)*, [1989] 1 S.C.R. 927, <<http://scc.lexum.umontreal.ca/en/1989/1989rcs1-927/1989rcs1-927.html>>.