



Campaign for a Commercial-Free Childhood

## Kids' App Store Standards

Google's Play Store and Apple's App Store are used by billions of people around the world, including children and families. Both app stores offer sections designated for kids: Google Play's "Family," and the App Store's "Kids."

Parents and families are led to believe that the apps in these sections are safe for children, but new research reveals that's not the case. Popular apps for pre-school children routinely pressure kids to make in-app purchases, serve manipulative and deceptive advertising, and illegally collect children's personal data.<sup>1, 2</sup>

Google and Apple have a responsibility to the children and families who use their app stores. In order to meet that responsibility, both companies should adopt strict standards to ensure that the apps they designate for kids are truly child-friendly. To ensure transparency and accountability, these standards should be clearly visible to both users and developers.

### **1. All apps designated appropriate for kids should be reviewed by a human.**

Human review should ensure that all apps designated for children meet the standards laid out below, and that the content of the app is appropriate for kids.

### **2. All apps designated appropriate for kids must comply with the Children's Online Privacy Protection Act.**

This means:

- Obtaining verifiable parental consent before collecting personal information from children.
- No accessing contacts, photos, and other data stored on a device, unless it's specifically required for the app to work.
- No behavioral or targeted advertising that uses children's personal information.

### **3. Apps designated appropriate for kids should not include in-app purchases.**

Parents should have peace of mind that any apps they download for their children can be played without making additional purchases. Games for children that "offer" in-app purchases often *require* them in order for players to advance in a level, or even to complete the game. No app should deliberately frustrate or manipulate children into making, or wanting to make, purchases of any kind. By prohibiting in-app purchases, Google and Apple can stop this unethical manipulation of children.

4. **Apps designated “educational” must have evidence to substantiate educational claims.**

The deceptive marketing of children's apps as educational takes advantage of parents' natural tendency to want what's best for their children. Right now, apps labeled “educational” are just as likely to contain manipulative advertising as non-educational apps.<sup>3</sup> They are also highly unlikely to actually be educational – one recent study of 171 popular pre-K apps found that almost none of them were developmentally appropriate for how children learn.<sup>4</sup>

5. **Apps designated appropriate for children 5 and under should not contain advertising of any kind.**

As the American Academy of Pediatrics notes, “Children at this age cannot differentiate between advertisements and factual information, and therefore, advertising to them is unethical.”<sup>5</sup>

6. **If apps designated appropriate for children 6 – 12 contain advertising, it must be limited.**

Children are more vulnerable to advertising than adults and benefit when ads are clearly distinguished from content.<sup>6</sup> Ads in apps for children 6 – 12 must not:

- Be disguised as part of the game, including through sound effects, visuals, or other tactics.
- Be difficult to click out of or away from.
- Be required to watch in order to receive tools, power-ups, or otherwise advance in a game.
- Feature characters from the app, a practice known as “host selling” which is prohibited on children's TV.
- Be for any product harmful to children, including (but not limited to) alcohol, tobacco, gambling (including lotteries), or violent or sexualized media.

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<sup>1</sup> Meyer, M., Adkins, V., Yuan, N., Weeks, H. M., Chang, Y.-J., & Radesky, J. (2018). Advertising in Young Children's Apps: A Content Analysis. *Journal of Developmental & Behavioral Pediatrics*. <https://doi.org/10.1097/DBP.0000000000000622>

<sup>2</sup> Barrett, L. & Campbell, A. (2018). Request to Investigate Google's Unfair and Deceptive Practices in Marketing Apps for Children. [https://www.commercialfreechildhood.org/sites/default/files/develop-generate/vad/google\\_ftc\\_complaint.pdf](https://www.commercialfreechildhood.org/sites/default/files/develop-generate/vad/google_ftc_complaint.pdf)

<sup>3</sup> Meyer et al. (2018).

<sup>4</sup> Callaghan, M. N., & Reich, S. M. (2018). Are educational preschool apps designed to teach? An analysis of the app market. *Learning, Media and Technology*, 43(3), 280–293. <https://doi.org/10.1080/17439884.2018.1498355>

<sup>5</sup> Council on Communications and Media. (2016). Media and Young Minds. *Pediatrics*, e20162591. <https://doi.org/10.1542/peds.2016-2591>

<sup>6</sup> Clarke, B., & Svanaes, S. (2012). Digital marketing and advertising to children: a literature review. Advertising Education Forum. 45. Retrieved from <http://www.aeforum.org/gallery/8612144.pdf> (citing Mallinckrodt and Mizerski 2007; Ali, Blades et al. 2009).