

Advertising + Marketing

Roblox Found in Violation of CARU's Advertising Guidelines

The Bottom Line

- CARU will continue to monitor Roblox to ensure compliance with Roblox's policies and the CARU Advertising Guidelines.
- Brands that direct content toward children under age 13 should ensure that any disclosures are clear and conspicuous in language that children can easily understand.
- Influencers who appeal to children should clearly and conspicuously disclose their material connections in language that is understandable to children.

The Children's Advertising Review Unit (CARU), a self-regulatory organization that monitors advertising directed to children under the age of 13, found Roblox violated its Self-Regulatory [Advertising Guidelines](#). CARU claimed that advertising on Roblox often did not include clear and conspicuous disclosures in language that children can easily understand.

The Roblox Platform

According to Roblox's own statistics, the majority of the platform's users are 9 to 12 years old. When users open a Roblox account, they are required to provide their full birthdate, username, password and option to select their gender. According to CARU, unless a parent chooses to enable the "Restricted Account Mode" in the settings, users who are under 13 years of age can explore a vast array of content on the platform, including content that may be unsafe or inappropriate for children.

Experiences and Integrated Advertising

Within the Roblox metaverse, there are "experiences" created by users, which may include advertising. CARU was concerned with whether Roblox provides adequate tools for developers, brands and content creators to clearly and conspicuously disclose when advertising is included in the experience or when branded experiences within Roblox are advertising.

CARU determined that featured ads in the experiences and integrated content in videos did not include the appropriate

disclosures. CARU recommended that Roblox ensure that such advertisements are clearly and conspicuously identified as ads in language and/or audio that children can see, hear and easily understand as advertising. While CARU acknowledged that Roblox was not the advertiser when brands worked with developers to include these advertising messages, CARU believes that Roblox has an important role to play in assisting brands and developers with compliance.

As discussed in our previous [alert](#), during the CARU investigation, Roblox established new Advertising Standards that require developers to block advertising content from children under 13 years old. The new Roblox Advertising Standards go into effect on June 15th. Despite the new Roblox standards, CARU will continue to monitor Roblox to ensure compliance with the CARU Advertising Guidelines. CARU also recommended that Roblox establish and implement a monitoring process to enforce its new Advertising Standards.

The Influencer Program

Roblox sponsors an official influencer program called the “Roblox Video Stars Program,” which is open to influencers with significant followings who self-produce Roblox-related video content. CARU was concerned about the extent to which Roblox provided guidance to and monitored the Roblox Video Stars social media influencers to ensure they clearly disclosed their material connections to Roblox.

CARU found that many of these influencers did not clearly or conspicuously disclose their material connections in language that was understandable to children. For example, CARU was concerned that children would not understand the word “commission” and recommended language that would be more understandable to children (e.g., “I get paid when you use my Star Code”).

CARU recommended that Roblox (1) provide influencers with additional guidance and examples of clear and conspicuous disclosures so children understand that there is a material connection between Roblox and the influencer and (2) increase its monitoring efforts to uphold and enforce its influencer program rules, the CARU Advertising Guidelines, industry best practices and applicable rules and regulations.

Privacy Issues

In addition to these advertising concerns, CARU raised privacy concerns and is working directly with Roblox’s Children’s Online Privacy Protection Act (COPPA) Safe Harbor to address these issues.

It remains to be seen if CARU’s recommendations and remedies or others by Roblox will satisfy CARU. However, we can anticipate that CARU will be closely monitoring any experiences directed to children on Roblox.

For More Information

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