



Body Image in Advertising: Call for Evidence Interim Statement

1. Introduction

The UK Advertising Codes include rules that, directly or indirectly, seek to prevent ads from harmfully affecting how audience members see themselves physically and how they believe others see them physically. A wide range of factors can affect how people feel about body image, including family and social interactions, peer pressure, education, media, cultural and societal norms, advertising and more besides.

Dissatisfaction with body image is increasingly understood to link to a poorer quality of life, psychological distress and the risk of unhealthy eating behaviours and disorders. To mitigate any negative role that advertising might have in contributing to these outcomes, the Advertising Standards Authority (ASA) has established a strong track record of banning the minority of ads that, on an assessment of their content and context, are considered likely to encourage or condone harmful behaviours or attitudes related to body image¹.

In view of recent political focus on efforts to take body image issues seriously, accompanied by research and evidence, the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) considered it important to seek an up-to-date understanding of the current evidence base surrounding the potential body image related harms from advertising and the potential detrimental impact of those harms on consumers. To support the ASA's regulation and to ensure the Codes and guidance adequately address body image harms arising from advertising, the Committees launched a call for evidence, which closed in January 2022².

2. Responses to the Call for Evidence

The call for evidence generated 12 responses from a range of stakeholders including academics, NGOs, thinktanks, a member of the cosmetic interventions industry, a social media company, and a Parliamentarian. CAP and BCAP would like to thank respondents for their contribution to the call for evidence.

Headline commentary on the responses is presented in this section. A table setting out longer form summaries of the responses to the call for evidence can be found on the [ASA and CAP website](#), along with copies of the full responses.

Groups sharing protected characteristics

¹ Page 3 'Policy Background', [Body Image in Advertising: Call for Evidence](#)

² <https://www.asa.org.uk/resource/body-image-call-for-evidence.html>

- Much of the commentary and evidence submitted related to the potential impact of advertising on gender-based groups - men and women, boys and girls.
- Respondents contend that body image pressures are likely to be intensified for people who possess one or more protected characteristics (such as people from minority ethnic backgrounds, LGBTQ+ people and people with disabilities) and in almost all cases, the ideal body type presented is drawn from a Western conception of beauty.
- One respondent posits that certain fashion advertising now includes racially diverse models whose bodies are larger than typically seen in traditional fashion ad campaigns. However, such portrayals often place particular focus on the models' larger, powerful-looking thighs and bottoms. The respondent contends that such portrayals could have the effect of replacing one body image ideal (for example, very thin body types) with another, which is potentially more unattainable as it combines larger bottoms with slim waists.

Formation of an idealised body image

- Researchers examining viewers' exposure to *unappealing* images of very low-weight women and *neutral* images of low-weight women argue that regardless of whether those images present thinness as desirable, exposure to such images can impact on viewers' perceptions of 'normal weight' and lead to internalisation of thin body ideals.
- Respondents submitted evidence, which they argue indicated that muscularity in images, whether or not positively portrayed, affects people's perceptions of an ideal male body. Conversely, respondents also provided evidence, which they suggested indicate that exposure to images of high-BMI female bodies or low-muscularity male bodies results in viewers' preference of body size or muscularity becoming less extreme, in comparison to exposure to images of very low-weight female bodies and high-muscularity male bodies.

Social media

- Many respondents were concerned about the potential for social media advertising to lead to body image harms. Additionally, some respondents were concerned about the role that influencers are argued to play, including through marketing, in perpetuating body image ideals.
- Evidence was submitted in relation to the potential impact of certain ad content for product sectors, such as fashion, cosmetic interventions and weight/loss management products. One respondent contends that the evidence suggests social media advertising plays an important role in enticing consumers, particularly young adults, to undergo cosmetic procedures. The respondent referred to upcoming evidence that analyses the potential impact of particular ad content in cosmetic

interventions ads shown on Instagram, including the use of emojis, trivialisation of procedures and lack of reference to medical risks.

Proposed interventions (labelling digitally altered images)

- Three respondents expressed support for mandatory labelling of ads to disclose when they feature bodies or body proportions that had been digitally altered. Reference was made to the growing prevalence of alteration apps and filters³.
- A respondent argued it is important that consumers have an accurate and authentic representation of the human form, or are able to discern if alteration software has been used in instances where it has made a significant change to body parts or proportions. They considered there may be scope for further guidance or regulation to address the potential impact of digital alteration in ads that result in a material difference to body parts or proportions and possible adverse body image perceptions (in contrast with minor alterations, for example, erasing logos or creasing from clothing). The respondent advised that such interventions must be considered in consultation with industry and be evidence based.

Proposed interventions (other)

- To mitigate potential risks of people forming extreme perceptions of body image ideals (arising from exposure to portrayals of very thin or muscular models) some respondents called for restrictions on the featuring of models based on BMI (or similar) or body fat percentages and bringing ads for muscle-building products within scope of existing Code rules for weight loss/management products.
- A respondent contends that larger bodied people are more vulnerable to pro-thin, anti-fat messaging and that further guidance is needed to address potentially stigmatising messages and content in ads that are argued to dehumanise and objectify larger bodied people.
- Respondents expressed concerns regarding the potential impact of advertising for weight loss/management products and called for greater restrictions on advertising for such products in relation to under-18s.

Lack of diversity

- A recurring theme within some of the responses related to the lack of diversity in advertising of body types. (It should be noted the UK Advertising Codes do not impose requirements or quotas to include a diversity of body types in the content of

³ Examples of digital image alteration apps include, for example, Facetune and Faceapp. Social media apps, such as Instagram and Snapchat, also contain built-in filters that allow user to smooth skin texture and modify proportion of body features in images.

ads.) There are strong sentiments among respondents that further initiatives could be made to address this.

3. CAP and BCAP Assessment of Evidence

CAP and BCAP have considered the submissions to the call for evidence against criteria set out in the CAP and BCAP Evidence-Based Policy-Making Guidance⁴. The Committees consider that an evidence-based approach is necessary to deliver regulation that is transparent, accountable, proportionate, consistent and targeted where action is needed and the best basis for considering regulatory change. The guidance is, in large part, intended to advise stakeholders who cite evidence to support their calls for change to advertising regulations.

The guidance notes that whilst CAP and BCAP do not prescribe study design, in general the Committees (and other regulatory bodies exercising public functions) favour research which:

- identifies the nature, scale and impact of any detriment;
- is fair and impartial and follows a recognised methodology;
- takes into account confounding variables;
- is carried out on a representative cross-section of a population similar to that of the UK or on a representative sample of the relevant part of the population; and,
- mitigates against potential bias.

Additionally, CAP and BCAP point to key considerations for those who are commissioning research or who aim to influence policy. Of potentially greatest relevance to understanding the impact of advertising on body image, the Committees advise that:

- the most useful studies will be based in and representative of the UK;
- quantitative studies should be large enough to produce results that are representative of the population or the constituent group targeted;
- where possible, experimental studies should replicate realistic viewing, reading or online behaviour and use actual published ads or those which are representative of the general tone and style of advertising in the relevant market;
- studies that show associations between factors can be useful, but alone are unlikely to prove that an advertisement or advertising practice causes a particular effect; and
- studies which attest to media-specific effects where a phenomenon may be observed across media, for example in editorial content and advertising, are most useful if they make a distinction between advertising and other types of media content so that the effects measured can be attributed clearly to one medium or the other.

⁴ <https://www.asa.org.uk/static/uploaded/cb20c00f-b559-40a2-8b5677188511b45b.pdf>



Taking into account the principles related to study designs and key commissioning considerations reflected in the CAP and BCAP Evidence-Based Policy-Making Guidance, in general, the Committees consider further evidence is required to support some of the commentary submitted to the call for evidence, in particular, evidence that demonstrates the causal link between advertising and the specific body image-related concerns raised by the respondents. For example, respondents contending that social media advertising, including influencer advertising, gives rise to potential body image harms, do not make a clear distinction between the effects of advertising and non-advertising content; the latter falling outside the remit of the advertising regulator.

Accordingly, the evidence received, in our view, does not at present identify significant gaps in the current regulatory framework, which sets a range of general and specific restrictions to prevent ads from harmfully affecting how audience members see themselves physically and how they believe others see them physically. The policy background to these restrictions is set out in the 'Policy Background' section of the [Call for Evidence](#) document.

However, CAP and BCAP acknowledge the strength of concerns related to body image and advertising, including concerns that relate to children and young people and their engagement with social media, and the potential impact on people with different protected characteristics. Respondents to the call for evidence have made CAP and BCAP aware of soon-to-be-published research that may add to the Committees' understanding of the impact of advertising on body image and, therefore, their assessment of the restrictions in place. Together with the ASA, CAP and BCAP are also undertaking to respond to recommendations, published in August 2022, from House of Commons Health and Social Care Committee in its report: *The Impact of Body Image on Mental and Physical Health*⁵.

Of relevance to the standards setting functions of CAP and BCAP, the Health and Social Care Committee's report recommends that Government works with the industry and the ASA to encourage advertisers and influencers not to doctor their images. It further recommends Government should introduce legislation that ensures commercial images are labelled with a logo where any part of the body, including its proportions and skin tone, are digitally altered. It should be noted that CAP and BCAP have long maintained guidance on *The Use of Pre and Post-production Techniques in Ads for Cosmetics*⁶. The guidance explains the ways in which the use of these techniques risks misleading consumers about the likely capabilities of a product. For example, it covers the use of post-production techniques such as digital retouching of images, as well as pre-production techniques such as make-up, styling, eyelash inserts and hair extensions.

The Health and Social Care Committee's recommendations sit alongside recent inspections of body image harms by the Women and Equalities Committee⁷; the Department of Culture, Media's Online Advertising Programme consultation⁸; the Government's acknowledgement

⁵ <https://committees.parliament.uk/publications/23284/documents/170077/default/>

⁶ [Guidance on the use of pre and post-production techniques in ads for cosmetics - ASA | CAP](#)

⁷ [Changing the perfect picture: an inquiry into body image - Committees - UK Parliament](#)

⁸ [Online Advertising Programme consultation - GOV.UK \(www.gov.uk\)](#)

in the Women's Health Strategy for England⁹ of the possible link between digitally altered body images and mental health, including the potential harms such a link may cause, and commitment to consider further proposals to tackle body image issues related to digitally altered images; as well as calls for legislation requiring advertisers, broadcasters and publishers to display a logo where an image of a human body or body part has been digitally altered in its proportions¹⁰.

3. Next Steps

In considering where to devote CAP and BCAP resources in relation to any advertising policy issue, the Committees must work according to prioritisation principles, which take into account a wide range of factors. For example, CAP and BCAP must have regard to: the extent to which the ASA system already responds to, or has the tools to respond to, the body image issues identified; the full spectrum of advertising policy issues that falls under the ASA system's remit; evidence of detriment arising from advertising and the likely impact of potential remedies; and significant socio-political concerns around controls on advertising.

Accordingly, following CAP and BCAP's evaluation of the respondents' contributions and a consideration of the evidence submitted to the call for evidence launched, and in response to a recommendation made to the Government by the House of Commons Health and Social Care Committee, the Committees are undertaking to prioritise the following next steps:

Policy focus	Action	Complete by
Labelling of digitally altered images in advertising	<ul style="list-style-type: none"> • In-depth evidence review • Consideration of related requirements / practices in overseas' jurisdictions e.g. in France, Israel and Norway • Stakeholder roundtable • Consideration of ASA-commissioned research (which, if commissioned, would extend the date of completion) • Publish outcome and, as relevant, any next steps 	End of Q1, 2023
Depiction of muscularity in ads	<ul style="list-style-type: none"> • In-depth evidence review • Proactive assessment of relevant ads • Consideration of ASA-commissioned research 	End of Q4, 2023

⁹ [Women's Health Strategy for England - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/women-s-health-strategy-for-england)

¹⁰ [Digitally Altered Body Images Bill - Parliamentary Bills - UK Parliament](https://www.parliament.uk/bills/2022-23/digitally-altered-body-images)

	<p>(which, if commissioned, would extend the date of completion)</p> <ul style="list-style-type: none"> • Publish outcome and, as relevant, any next steps 	
<p>Depiction of women from minority ethnic backgrounds in ads and the potential for creating new and unattainable body image ideals</p>	<ul style="list-style-type: none"> • In-depth evidence review • Proactive assessment of relevant ads • Consideration of ASA-commissioned research (which, if commissioned, would extend the date of completion) • Publish outcome and, as relevant, any next steps 	<p>End of Q4, 2023</p>

CAP and BCAP are committed to continue maintaining a watching brief on other areas raised by stakeholders and the evidence base that improves their understanding of the extent to which advertising may harmfully affect how audience members see themselves physically and how they believe others see them physically. A wide range of factors can affect how people feel about body image, including family and social interactions, peer pressure, education, media, cultural and societal norms, advertising and more besides. Notwithstanding, CAP and BCAP will continue to seek to understand the role that advertising plays, amongst other contributing factors, and consider how their regulation might mitigate those potential body image related risks that arise from advertising.

CAP and BCAP therefore remain open to hearing from stakeholders who did not respond to the [call for evidence](#) and would invite them to submit relevant evidence to bodyimage@cap.org.uk while the further exploratory work is ongoing.

CAP and BCAP ask stakeholders to have regard to their [Evidence-Based Policy-Making document](#), which sets out the Committees’ approach to evidence-based policy making, including the factors that they take into account, such as the nature and robustness of the evidence base, when considering any advertising policy issues.

While CAP and BCAP’s body image review is ongoing, the ASA has continued to regulate irresponsible ads that are likely to adversely impact consumers’ body image and take action where needed, through enforcement of existing protections offered by the UK Advertising Codes.