

## Body Image in Advertising: Call for Evidence

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#### 1. List of respondents [and their abbreviations used in this document]

	<b>Organisation / Individual</b>	<b>Abbreviation</b>
1	Changing Faces	CF
2	Appearance, Culture & Evolution Lab at Durham University	DU
3	Eating Disorders and Behaviours Research Group at University of Edinburgh	EU
4	Emi Howe, Sociologist/Author	EH
5	Erasmus University Rotterdam	EUR
6	Girlguiding	GG
7	Luke Evans MP	LE
8	Mental Health Foundation	MHF
9	Meta	MT
10	Nuffield Council on Bioethics	NCB
11	St Mary's University Twickenham London	SMU
12	Transform Hospital Group	THG

## 2. Content

1. Type of and themes of ad content that give rise to body image concerns
2. Impact of advertising on self-perception of body image experienced by different audience groups
3. Impact of social media advertising, including influencer marketing, on body image concerns, in light of increased online media use
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### 3. Responses to call for evidence

1. Types and themes of ad content that give rise to body image concerns		
	Respondent/s	Comments
1.	<b>CF</b>	<p>CF's commissioned independent research in 2021 and volunteer campaigners indicated that how visible differences are shown, or not, in ads and other media has an impact on body image, mental health and wellbeing:</p> <ul style="list-style-type: none"> <li>• Not seeing a person with a visible difference in fashion and beauty brands as a teenager made almost 2 in 5 (37%) feel ugly and around a third felt excluded (33%) and isolated (32%). A quarter (25%) felt ignored.</li> <li>• People with visible differences report long term impacts from not seeing people who look like them represented in society and across popular culture. A third report low levels of confidence (34%), and 3 in 10 have struggled with body image (31%) and low self-esteem (29%). A quarter (24%) say it has affected their mental health.</li> </ul> <p>In addition to people with visible differences feeling ignored, isolated and excluded, they are also bombarded with ad messaging that tell people they can fix their perceived imperfections and become more confident, attractive and successful by changing their outward appearance.</p> <p>CF campaigners did not feel strongly that there is a prevalence of portrait-style images on social media. The growing trend of Instagram reels and stories, as well as other platforms like TikTok mean that this focus on portraits isn't particularly a standout feature. The overarching lack of positive representation and prevalence of ads to 'fix' imperfection, was of far greater concern. Campaigners felt ads on the main focus on people having a 'perfect' face, and ad messaging about covering and hiding is negative and often feature models already adhering to the standard beauty 'ideals'.</p>
2.	<b>DU</b>	<p>DU notes own research expertise primarily relates to body size and shape. Considers more recent evidence/points of note mean ads that comply with current guidance may still likely create body image concerns.</p> <ol style="list-style-type: none"> <li>1. Own research, which used unappealing images of very low weight women, and other studies which used neutral images of low weight women, found that viewers' internalised body ideal or perceptions of 'normal weight' can be affected even when the image is not presenting thinness as desirable. Such effects have been found in British student samples, Australian student samples, online samples; DU have early evidence that the same can be seen in British school children as young as 11 years. All these studies use robust experimental methods, control for participants' body perceptions at baseline, and find consistent results across samples. DU expresses confidence in such evidence.</li> </ol> <p>Contends that existing ASA/CAP position in which ad images that suggest, potentially harmfully, that being unhealthily thin is somehow glamorous or otherwise desirable are likely in breach of the Codes does not appropriately mitigate the risks experienced by viewers, who are exposed to large number of bodies at a given weight extreme. Such risks occur whether those underweight bodies are present as aspirational.</p>

		<p><b>Recommendation:</b> Given that visual exposure to high numbers of low weight bodies can be harmful, whether they are presented as aspirational or not, ASA/CAP should consider implementing a minimum BMI or similar requirement for models and actors in advertising as per Paris Fashion Week for instance (e.g., minimum BMI 19kg/m2).</p> <p>2. Whilst DU welcomes GS guidance that targets pressure to achieve ‘idealised gender-stereotypical body shape or physical features’, considers greater attention should be given in application to muscularity ideals for young men. Experimental studies in UK and Australia show consistent evidence that muscularity in images (whether or not positively presented) affects perceptions of male body ideals. This creates pressure directly on male viewers, as well as directly through broader perpetuation of appearance norms.</p> <p>3. <b>Recommendation:</b> CAP Code rule 13.3 could include muscle-building products, in addition to weight loss/management products. Additionally, media creators often look to emphasise muscularity of models/actors by a) recruiting those with very low levels of body fat and b) require them to undertake a period of dehydration to make skin cling more the muscle underneath. Regulators could consider specifying a minimum body fat percentage for models/actors in ads (eg 8-10% for men, 18% for women). Could also consider banning images which suggest dehydration process has taken place; such intervention would address the health needs of the models/actors as well as the mental wellbeing of the viewer.</p>
4.	<b>EU</b>	<p>EU referred to four own studies, all of which are unpublished data. Across the series of experimental studies, EU found that:</p> <p>1. Viewing thin models in advertisements has a negative impact on young women’s body image, but that viewing models of different sized bodies, that do not conform to the thin ideal, may have a positive impact on young women’s body image.</p> <p>First study examined the impact of short-term exposure to ad campaigns feature either models with bodies conforming to the thin ideal, or models with bodies of various sizes not conforming to the thin ideal. Thin ideal refers to the ideal that a thin body is desirable, and is represented by thin to very thin female models in advertising images. Outcome measures were state body image and state self-esteem. Study focussed on swimwear ads, sources from fashion brand account posts on Instagram. Static images for the thin ideal condition were taken from Victoria’s Secret, Beach Bunny and Topshop posts; images for the not thin ideal condition were sourced from Marks and Spencer, Aerie, and Ann Summers. Participants (80 young women, aged 18-15) were shown 8 images for both conditions for five seconds each. Result suggests that viewing thin models has a negative impact on young women’s body image, but that viewing models of different sized bodies, that do not conform to the thin ideal, may have a positive impact on young women’s body image. Results relate to short-term effects of exposure to advertising images.</p> <p>Second study also examined the impact of short-term exposure to ad campaigns feature either models with bodies conforming to the thin ideal, or models with bodies of various sizes not conforming to the thin ideal, with the same outcome measures as the first study. Ad materials (static images) were sourced from clothing brands Instagram and depicted women modelling lingerie. Participants (88 young women, aged 18-30) were assigned to one of the three image conditions: thin ideal, not thin ideal and neutral (control images depicted outdoor scenes such as landscapes and cityscapes). Participants were asked to report, through scoring, measures of appearance self-esteem and body image before and after viewing the ads; they were shown 10 images for 10 seconds each. Results replicate findings of the first study.</p>

		<p>2. Viewing fashion website images with models who do not conform to the muscular ideal may have a beneficial effect on men's body image.</p> <p>Study examined the impact of short-term exposure to fashion advertising campaigns featuring either models with bodies conforming to the muscular ideal, or models with bodies not conforming to the muscular ideal. The muscular ideal refers to the notion that a lean body with visible, defined muscularity is desirable for men, and is represented by male models who fit this body type in advertising imagery. measures were state body image and state self-esteem. Ad materials featured images of clothing from River Island, H&amp;M, ASOS and Savage X Fenty. Participants (235 young men, aged 18-35 years) were assigned to one of the three image conditions: muscular ideal, not muscular ideal and neutral (images with no model but with same clothing). Participants were shown 10 images according to the assigned condition for 10 seconds each and asked to report, through scoring, measures of appearance self-esteem and body image before and after viewing the ads.</p> <p>Result suggests that viewing fashion website images with models who do not conform to the muscular ideal may have a beneficial effect on men's body image. The effect size for the interaction between image condition and time is small for this study. This could suggest that young men's body image is less affected by whether the model's body meets a muscular ideal than women's body image is affected by the thin ideal. However, the study included a range of clothing and not just underwear or swimwear, unlike the studies we conducted with women. Furthermore, the images were designed to display garments to online shoppers browsing the website, and did not contain any advertising text or background/staging that would be seen in a traditional or social media fashion advertisement.</p> <p>3. Beauty advertisement images with an empowerment message have a more positive impact on young Chinese women's body image than advertisements with an objectification or self-objectification message</p> <p>Study (sample in China) examined the short-term exposure to different forms of messaging within beauty ad campaigns primarily aimed at female consumers. Types of messaging considered were objectification, self-objectification and empowerment. Outcome measures were state body image, mood and self-esteem. Ads considered to feature a self-objectification message showed women engaging in surveillance of their appearance, feeling shame in response to a perceived flaw, and correcting the perceived flaw using the product. Ads meeting criteria for the empowerment messaging countered traditional gender norms (e.g. women in positions of power in the workplace), and focused on natural beauty and self-worth. All ads featured static images of women, sometimes alongside other women or men. Participants (116 young Chinese women, aged 18-35) were assigned to one of the three image conditions: objectifying, self-objectifying and empowering. They were shown 10 images for 10 seconds each and were asked to evaluate their mood, self-esteem and body image before and after exposure to the ads. Results suggest that beauty ad images with an empowerment message have a more positive impact on young Chinese women's body image than advertisements with an objectification or self-objectification message. These results only relate to short-term effects of exposure to beauty advertising images.</p>
4.	<b>GG</b>	GG's submission drew references to findings of their annual research <a href="#">Girls' Attitudes surveys</a> , anecdotal experiences from their <a href="#">youth advocates</a> and findings from a 2019 <a href="#">ad audit</a> carried out by their Youth Panels.

GG's research found that during the first Covid-19 lockdown, girls and young women spent more time on social media (85% of girls aged 15-18). Increased online access resulted in experiences of increased body image related pressures: 26% said they felt pressured to lose weight or exercise (2020); 25% of girls and young women aged 15 to 18 said they felt under more pressure to look a certain way (2021).

Girls and young women felt that the narrow ways in which women are represented in the media, including social media and influencers, negatively impact their confidence, wellbeing image eg reinforcing unrealistic beauty ideals, sexual objectification, and normalising unequal social and professional roles for women and men.

GG's Girls' Attitudes Survey indicated girls and young women believe the media reinforces the message that women and girls' value is correlated to their appearance, and it often relies on sexist and stereotypical images of women. This reinforces the idea that women's bodies exist only to be looked at, to sell products and to entertain through sexualisation and objectification, and they look 'attractive' based on stereotypical ideals of beauty.

The Girls' Attitudes Survey found that

- 86% aged 11-21 agree that the media focuses too much on what women look like, instead of what they achieve (2018 survey) • 66% aged 11-21 compare themselves to celebrities (2016 survey) 12 January 2022
- 62% aged 11-21 believe boys think girls should look like the images they see in the media (2018 survey)
- 53% aged 11-21 think bloggers and YouTubers create the idea of being perfect that is unrealistic and unachievable (2018)
- 52% aged 11-21 have seen images in the media in the past week that made them feel pressured to look different (2017 survey)
- 52% aged 11-21 said they sometimes feel ashamed of the way they look because they don't look like girls and women in the media (2018 survey)
- 51% aged 11-21 said they'd like to look more like the pictures of girls and women they see in the media (2018 survey)
- 47% aged 11-21 have seen stereotypical images of men and women in the media in the past week that made them feel less confident (2017 survey)
- 44% aged 11-21 think that one of the main causes of stress among girls is the pressure to look like a celebrity (2018 survey)

GG's research also shows that the media, including social media, contributes towards the pressures girls and young women face around their appearance. In our 2018 Girls' Attitudes Survey, 79% of girls aged 11 to 21 said there is too much discussion about women's body shape in the media. 52% of girls and young women aged 11 to 21 said they sometimes feel ashamed of the way they look because they don't look like the girls and women in the media. And a similar number (51%) said they'd like to look more like the pictures of girls and women they see in the media. The 2017 survey showed almost half (47%) of girls and young women aged 11 to 21 had seen stereotypical images of men and women in the media in the past week that made them feel less confident.

GG's 2019 Youth Panel audit of ads analysed the types of ads that were published. It found that there are still a number of ads that young women feel portray harmful gender stereotypes, with a large percentage of these focusing on body image, objectification and sexualisation causing many of them to feel sad, uncomfortable, self-conscious and inadequate when they saw such images. The audit highlighted that girls and young women are repeatedly shown adverts that portray the same body type. This makes them feel they should aspire to look the same way. Consequently, they feel less happy about how they look.

5. <b>MHF</b>	<p>In addition to MHF's own 2019 <a href="#">report on body image</a> and <a href="#">2020 report</a> from the Scottish Government body image advisory group which MHF co-chaired, MHF also drew on findings from a workshop held with MHF Young Leaders (a group of 14-25 year olds from diverse backgrounds with a range of lived experiences) and survey to their Our Personal Experience Network (OPEN) to generate further qualitative feedback from a wider range of difference ages (117 responses received but not intended as a representative sample).</p> <ol style="list-style-type: none"> <li><b>1. 'Perfect' or 'flawless' features</b> – MHF Young Leaders considered that being relentlessly confronted by models with “perfect” or “flawless” features in advertising can be damaging to people’s body image, especially when the “perfection” presented is representative of a narrow, Western standard of beauty. Images of perfection lead to unflattering comparisons with real bodies and the omission of differences from the perfect advertising norm make these differences seem shameful and undesirable; it makes “differences” seem like “flaws”.</li> </ol> <p>Also raised concerns about problematic dynamic in the marketing of certain types of products; contends that advertising acts to create a gap between an idealised, aspirational body image and what people can realistically achieve. The desire for the ideal drives demand and such market incentive is an important reason why regulation protecting body image is necessary, especially in high-risk advertising areas such as dieting and weight-loss, cosmetic surgery, and fitness. MHF's 2019 survey found that one in four girls and one in ten boys have edited photos of themselves in order to change their face or body shape because of concerns about their body image, further contributing to the pervasiveness of “perfect”, “flawless” images.</p> <ol style="list-style-type: none"> <li><b>2. Idealised images</b> – MHF Young Leaders felt that the association between perfect physical features and idealised happy situations implies that not meeting standards of physical beauty means they should not or cannot be happy. Dynamic is made worse by ads that show people feeling happy after an appearance transformation eg following cosmetic surgier or weight-loss. The use of idealised bodies to create aspirational ads, not directly related to physical appearance, could also create body image pressures.</li> <li><b>3. Placement of ads</b> – placement and timing of ads can exploit people’s insecurities about their body image and make a potentially harmful ad more dangerous. Referred to their complaint about the placement about MYA ads in 2018 for breast implants which appeared during Love Island. Considers that the placement of the ad, as the aspirational presentation, presented risks to viewers’ body image given Love Island attracts a young audience and the programme itself is responsible for glorifying a narrow beauty ideal.</li> </ol>
6. <b>SMU</b>	<p>SMU submitted a series of studies which analyse the ways in which different media (magazines, billboards and social media) represent bodies – noted that the studies examined ad content and messaging, rather than audience perception (ie effect on audience):</p> <ol style="list-style-type: none"> <li><b>1. Brown, N., Campbell, C., Owen, C. &amp; Omrani, A. (2020)</b> – study on representation of gendered and sexualised bodies. Compared the way in which two teen girl’s magazines with the highest circulation, Seventeen and Teen Vogue, wrote about breasts. Found that Seventeen perpetuated the idea of an “ideal” breast which was not too big, not too small, and even had a specific shape. Girls who didn’t fit this ideal were positioned as consumers and told to buy bras to remedy their “problem”. Teen Vogue, in contrast, took a feminist informed approach and encouraged girls to reject patriarchal ideas of beauty, to reject the shame associated with their breasts being visible, and to challenge the idea of there even being an “ideal breast”. Teen Vogue articles were characterised by a deconstruction of media messages as well as an awareness of the role of the magazine itself plays.</li> </ol>

2. Owen, C. & Campbell, C. (2018) – study on how male genitals are discussed in four popular UK men’s magazines: Men’s Health, GQ, Attitude and Loaded. Messaging across all four titles were similar despite different target demographics. Such magazines act as cultural signposts and are influential platforms where masculinity is reproduced and commodified. Messaging assumed men are fearful about issues relating to their penis; laddish humor often deployed to soften discussions about injuries or damage. Articles also include messages about ideal size and aesthetics. Such magazines present aspirational goals and expose men to traumatising imaginings of what could go wrong, potentially leaving readers with fear of not being ‘man enough’.

3. Campbell, C., Owen, C., & O’Prey, J. (2021) – study analysing marketing tactics of Flat Tummy Co ad campaign on Instagram. Found the company employs a three-stage process to promote their products:

- a. Reinforce the message that women should aspire to a thin ideal
- b. Present messages that women are too weak or lazy to attain such ideal
- c. Present the ‘conclusion that the only way to attain such ideal is through purchasing their products

Ad content included pictures of exercise equipment, with slogans such as:

“Unless you fell on the treadmill, no one cares about your workout”.

Or a picture of a very slim women with her midriff on display would be followed by a slogan such as:

“A banana is 105 calories. A glass of prosecco is 80. Choose wisely babes.”

Found such tactics particularly concerning – reinforce harmful stereotypes ideals but further undermines women’s agency and explicitly instructing women to shun exercise and a healthy diet and instead to binge on junk food and alcohol.

4. Owen, C., Campbell, C., Majumdar, A., O’Prey, J., & Jaye, C. (In preparation) – focus group study examining billboard images used in ad campaigns by BooHoo and Pretty Little Things in 2019. Images used featured racially diverse models who are larger in size than typically seen in ad campaigns. Models had large powerful looking thighs and bottoms, often emphasised through the poses in which they were captured or the angles from which the photographs were shot. Participants reported that such portrayals were replacing one body ideal with another, potentially more unattainable as it combined large bottoms with slim waists. Some felt the portrayals were a shallow version of diversity.

SMU’s research found that ‘idealised’ body stereotypes are pervasive in media, with some media better than others at challenging the concept of ‘ideal’. Physical ideals are often linked to ideas of gender.



2. Impact of advertising on self-perception of body image experienced by different audience groups		
	Respondent/s	Comments
1.	CF	<p>CF believes that ads portray a very narrow view of beauty and consumers are under constant pressure to conform; pressure is intensified for people with visible differences who are at greater risk of poor body image. Many endure daily cycle of comments, stares and appearance related abuse. There is also a lack of mental health support available to those with visible difference.</p> <p><b>Children</b> – CF research found one in four children (25%) feel confident about how they look, a fall from 39% in 2018. For children with a visible difference such as a scar, mark or condition, the impact is even greater. Following the pandemic twice as many children with a visible difference say they are unhappy compared to 2019, and they are more likely than their peers to feel anxious about the future (42% versus 30%). Only one in four children would like to be friends with someone with a visible difference, a fall from 30% in 2018. School is also a much tougher environment for many young people with a visible difference compared to their peers. One in three have had mean comments about how they look and for one in four, this has escalated to some form of bullying.</p> <p><b>Adults</b> – CF research involving 1,000 participants with visible difference found that seven in ten experience negative behaviours such as stares, abuse and bullying because of how they look.</p> <p>People with visible differences are still largely absent from mainstream advertising and brand campaigns, despite about a fifth of people in UK self-identify as having a visible difference. CF research found:</p> <ul style="list-style-type: none"> <li>• 8 in 10 (79%) say they want to see more people with scars, marks and conditions represented in popular culture, including advertisements.</li> <li>• People with visible differences report long term impacts from not seeing people who look like them represented in society and across popular culture. A third report low levels of confidence (34%), and 3 in 10 have struggled with body image (31%) and low self-esteem (29%). A quarter (24%) say it has affected their mental health.</li> <li>• Not seeing a person with a visible difference in fashion and beauty brands as a teenager made almost 2 in 5 (37%) feel ugly and around a third felt excluded (33%) and isolated (32%). A quarter (25%) felt ignored.</li> </ul> <p>CF campaigners feel that people with visible differences are at best ignored by popular culture, and at worst, demonised. They are either presented as the villain or as a person to be fixed. They feel there is a hierarchy of how diverse and inclusive brands, ads and businesses are willing to be. For example, people with limb differences, skin conditions like vitiligo, or autoimmune conditions alopecia are featured more, but people with facial visible differences are rarely featured. Campaigners also raised a lack of men with visible differences in ads. CF research from 2020 found that three quarters of men with a visible difference say men are under pressure to meet macho male stereotypes, and a quarter say they feel self-conscious or embarrassed about showing parts of their body. Six in 10 men with a visible difference agree that people react differently to a man with a visible difference than a woman.</p> <p>CF's research indicates more positive representation could have a positive impact as it would help people with visible differences feel less excluded and help build self-confidence:</p>

		<ul style="list-style-type: none"> <li>Nearly a third (31%) of those surveyed say they feel accepted when they see someone with a visible difference positively represented in adverts and popular culture. If there was more representation of people with visible differences almost 2 in 5 (36%) say it would make them feel more confident and a third (33%) would feel happy.</li> <li>Around a quarter (26%) say increased representation would make it easier to talk to other people about their visible difference.</li> </ul>
2.	<b>DU</b>	<p>1. Childhood as a critical window of media impacts on body image</p> <p>Whilst most research concentrates on adolescence and adulthood, it is well established that large minority of children experience body dissatisfaction and weight concerns from the age of 5. Own research shows children report internalisation of media ideals from as early as 7 years old, and that internalisation predicts depressive symptoms and eating disorder risks in the same group (sample drawn from schools in Country Durham and Newcastle).</p> <p>Own representative cohort study in the North East found that body image concerns at age 7 predict continued dissatisfaction into teenage years – such concerns are not transient but track over time. DU has early evidence that visual exposure to underweight female bodies shifts perceived healthy body size in children as young as 11, and that preferences for muscularity can be shifted in children across the high school age range in a similar manner.</p> <p>Contends it is essential to consider the impact of advertising on developing body and appearance ideals in pre and early-adolescent-aged children to reduce concurrent and later body dissatisfaction.</p> <p><b>Recommendation:</b> Highly unnaturally proportioned ultra-thin, unrealistic bodies are ubiquitous in children’s environments, not only in children’s toys, but also apps, advergames, cartoons, computer games, and advertising in general. The well-evidenced vulnerability of children in this domain warrants a dedicated public and stakeholder consultation process which considers specific regulations around presentation of bodies in children’s media including advertising.</p> <p>2. Body mass as a risk factor for media impacts on body image</p> <p>Children, adolescents and adults in larger bodies are more vulnerable to the effects of pro-thin, anti-fat messages from social and cultural sources. Evidence from a large number of samples (mostly in the US but share similar media environment with the UK) shows those individuals report higher levels of internalised weight stigma and experience discrimination in educational, healthcare and other settings. Own research, which involved interviews with more than 100 4-9 year old children in England, found that children in primary school are aware of, often perpetuate, and are also concerned about the psychological, social and physical consequences of weight stigma for other children in their age group. People with higher body weights therefore represent an under-recognised group which is specifically vulnerable to the negative impact of advertising via internalisation of stigmatising messages. Considers that depiction of people with larger bodies in adverts is partially covered under CAP rule 4.9 and BCAP rule 4.14 but current guidance does not proactively and explicitly address the issue of weight stigma.</p> <p><b>Recommendation:</b> CAP could consider setting out recommendation for best practice for ads that feature people in larger bodies, similar to best practice guidelines published by several national and international obesity associations. Whilst it is beneficial to</p>

		encourage inclusion of all body shapes and sizes, the priority for ads that either focus on or featuring issues around obesity is to ensure portrayals are respectful and avoid dehumanising, objectifying use of images and language.
3.	<b>GG</b>	<p>States that girls and young women face a unique set of challenges to their mental health and wellbeing, including pressures around their appearance. GG research had seen a decline in girls' and young women's happiness over the past decade; poor body confidence can affect how girls feel about themselves and the world.</p> <p>Girls express dissatisfaction with their appearances from a young age, and can lead to feelings of embarrassment and shame. They also experience intense appearance pressure and the fear of criticism of their bodies by others affect their behaviours. Girls are pressured into placing top importance on their appearance, a sentiment that increases as they get older. Girls believe their appearance matters when it comes to being successful in life and there are double standards when compared with boys.</p> <p>Girls and young women experience significant appearance-based pressures from a young age and this increases significant over time. GG research found that in 2011, 73% of girls aged 7-21 were happy with how they looked, falling to 70% in 2018. However, this masks some of the differences across the age groups including a significant decline for the 17-21-year age group (69% were happy with how they looked in 2009 compared to 57% in 2018). In addition, when we look at girls that said they were 'very happy' with how they look, at age 7-10, 51% of girls say this. By age 11-16, this has decreased to 16%.</p> <p>GG's 2016 survey found that appearance related expectations are experienced at a young age and affects their body image perceptions:</p> <ul style="list-style-type: none"> <li>• 38% aged 7-10 and 77% aged 11-16 say they don't feel pretty enough</li> <li>• 53% aged 7-10 and 72% aged 11-16 feel they need to be perfect</li> <li>• 53% aged 11-21 say people make girls think how they look is the most important think about them</li> </ul> <p>Such pressures can have a significant and detrimental impact on girls' and young women's health and wellbeing, and their opportunities they feel they can have now and in the future.</p> <p>Believes body image is an equality issue – girls who are Black, Asian or Minority Ethnic, disabled or LGBTQ+ feel the exclusion and marginalisation more acutely in terms of the world that is presented back to them. GG research shows that girls and young women with multiple protected characteristics may feel additional pressure. 2021 Girls' Attitudes Survey showed 45% of girls and young women aged 11 to 21 have seen images online that have made them feel insecure or less confident about their appearance. Girls and young women aged 11 to 21 who identify as lesbian, gay, bisexual or questioning are more likely to feel pressured to look like what they see in these images (72% compared to 63% who are straight). Disabled girls and young women also feel this more — 79% aged 11 to 21 saying so compared to 63% of those without disabilities.</p> <p>When asked why these images make them feel insecure about themselves, girls and young women aged 11 to 21 gave that reason that they don't look like the people in them (45%), the images show everyone with the same body type (52%), they're unrealistic as they've been airbrushed, edited, or the people in them have had cosmetic procedures (60%), they feel pressured to look more like the people in the images (66%), and everyone in the images has the same 'perfected' look (78%).</p>

		<p>Views from GG Youth Panel members raised concerns that body ideals in the media do not consider the daily struggles girls and young women face surrounding disability, race, sex and sexuality. For many years, those who consider themselves 'different', or deviate from the European set of beauty standards have been deemed unattractive resorted to altering their appearances, including skin bleaching and hair straightening.</p> <p>The 2021 Girls' Attitudes Survey found that girls feel there needs to be more realistic and diverse representation of women in ads:</p> <ul style="list-style-type: none"> <li>• 95% want the advertising industry to show more positive, diverse representation of girls and women</li> <li>• 88% want adverts that have been airbrushed to say so</li> <li>• 88% want adverts to stop using sexualised images of women</li> <li>• 44% say there should be more diversity in the media (around ethnicity, disability and LGBTQ+)</li> </ul>
4.	<b>MHF</b>	<p>States that advertising can affect different groups differently, depending on factors such as their cultural or individual experience of body image, their perceived similarity or difference from norms of beauty in advertising, and their experience of representation in advertising.</p> <ol style="list-style-type: none"> <li>1. <b>Lack of diversity</b> - Overwhelming message from both MHF Young Leaders and OPEN was that a lack of diversity in advertising can lead to body image concerns: seeing one type of body could lead to people experiencing pressure to "conform" to what advertising is presenting as the ideal body type – in almost all cases an ideal drawn from a Western conception of beauty. Young Leaders felt that the one body type presented cannot be realistically achieved and prompts feelings of shame and disgust in their own bodies. Similar views also emerged strong in the OPEN survey. <p>People with protected characteristics, who are routinely excluded from representation in advertising, are at greater risks of experiencing body image concerns. For example, heterosexual men have been found to report higher levels of body appreciation than gay and bisexual men (Blashill et al (2016)). MHR's 2018 Mental Health Awareness Week survey indicated that a higher proportion of adults who had a health problem or disability that substantially limited their daily activities reported feeling shame (31%) or feeling down or low in the last year (47%) because of their body image, compared to individuals without a limiting condition (18% and 32% respectively). Disability was also a theme that emerged during engagement with young people and organisations as part of the Scottish Government advisory group on body image. Young people with disabilities and visible disfigurements felt that body image pressure was exerted from the emphasis on "perfect" features as well as by what is presented as "healthy".</p> </li> <li>2. <b>Sexualisation of black female bodies</b> - MHF Young Leaders raised some specific concerns around the sexualisation of the black female body, which undercut some of the progress that has been made in achieving greater diversity of body types in advertising. This shows that diversity in advertising cannot just be about delivering a more diverse range of "perfect", unattainable, or sexualised bodies to aspire towards; instead, diversity in advertising needs to be relatable.</li> <li>3. <b>Disability</b> - Young Leaders and OPEN also raised issues related to disability and illness, with reports of feeling inspired by positive images of disability in advertising, even when they are not disabled themselves. However, ads that presents disability and illness in a positive light is still in the minority.</li> </ol>

		<ol style="list-style-type: none"> <li>4. <b>Age</b> - Age was also an area that was considered to be poorly represented in advertising – older adults are regularly shown in care, hospices, or in funeral settings. One OPEN survey respondent noted that older people featured in ads are almost always celebrities in full make up and professionally styled hair. But for some, being older can be a protective factor against having negative body image perceptions.</li> <li>5. <b>Gender</b> - States that a person’s gender can also influence their experience of body image in relation to advertising. While women bear the brunt of negative body image experiences due to depiction of women in advertising, men can also be at risk. The Scottish Government body image advisory group heard from NHS staff working in specialist steroid clinics who report that many male patients attribute the desire to change their body through steroids to images and discussions they see in the media.</li> </ol>
5.	<b>NCB</b>	<p>In addition to NCB’s own evidence and recommendations in its 2017 report <a href="#">Cosmetic procedures: ethical issues</a>, respondent highlighted additional UK-based research:</p> <ol style="list-style-type: none"> <li>1. <a href="#">Surveys</a> conducted by the Mental Health Foundation with YouGov in 2019 highlighted that just over one in five adults said images used in advertising had caused them to worry about their body image.</li> <li>2. Research from Credos in 2016 indicated that 53% of boys felt that advertising was one of the biggest influences to look good (along with friends (68%), social media (57%), and celebrities (49%).</li> <li>3. A 2021 (Griffiths et al (2021)) study with gay or bisexual men living in the UK and other northern hemisphere countries (US, Canada), and those living in the southern hemisphere (Australia) highlights that body image dissatisfaction can change depending on the season: in summer, researchers “observed peaks for body dissatisfaction, pressure from media advertisements, pressure from peers on social media, the feeling that one’s body is on public display, and appearance comparisons.”</li> </ol> <p>Respondent also highlighted evidence from outside the UK:</p> <ol style="list-style-type: none"> <li>1. A <a href="#">survey</a> from YouGov America published in May 2021 indicates that 76% of US adults think that the media promotes an unattainable body image for women.</li> <li>2. A US study (Selensky &amp; Carels (2021)) examined advertising campaigns on body image suggests that advertisements have the power to shape attitudes and beliefs around weight. Participants’ self-esteem improved after viewing the Dove Real Beauty campaign, but women “feel bad about themselves and their bodies after viewing Victoria’s Secret campaign.”</li> <li>3. A study from April 2017 (Sasirekha (2017)) examined the impact of advertisements on 915 Indian women’s body image. It concluded that around 30% of women were pressurised by advertisements, and that “advertisements without a doubt have an influence on... body dissatisfaction.”</li> </ol>

3. Impact of social media advertising, including influencer marketing, on body image concerns, in light of increased online media use		
	Respondent/s	Comments
1.	<b>CF</b>	<p>CF recognises social media can be a positive and powerful tool to connect people, create online communities and a space to share experiences. CF conducted specific research into the experiences of people with visible differences as they use social media:</p> <ul style="list-style-type: none"> <li>• One in ten people with a disfigurement saying they are repeatedly harassed on social media.</li> <li>• CF's 2021 representation research found that over two-thirds (68%) are concerned about negativity towards people with visible differences on social media. Around 3 in 5, like being on social media because they can choose what people see (61%) but think it's much harder for people with visible differences to build a profile on social media (58%)</li> </ul> <p>CF campaigners raised concerns about the challenge of being able to identify when they were seeing an advertisement from a social media influencer, rather than an authentic review. They also expressed concerns about the lack of transparency around the use of filters, editing tools, styling, lighting and make-up – used by many influencers, despite their posts looking like 'selfies' or 'home filmed' content, when the reality is a considerable amount of production time and spend on creating a 'spontaneous' or 'natural' look.</p>
2.	<b>GG</b>	<p>GG's 2018 Girls' Attitudes survey found that 59% of girls and young women aged 11 to 21 said one of the main causes of stress among girls is the pressure from social media. Their 2020 GG survey shows that two out of five (39%) girls and young women aged 11 to 21 said they feel upset they can't look the way they do online. The pressures that society puts on girls' and young women's appearance has detrimental effects, and it needs to be recognised that influencer culture is contributing to this.</p> <p>GG research indicates influencers can promote unrealistic beauty ideals and unattainable lifestyles which make girls and young women feel pressured to be 'perfect'. GG 2021 Girls' Attitudes survey found that 71% of girls aged 11 to 21 think the media and influencers on social media need to do more to stop reinforcing gender stereotypes. Additionally, the 2018 Girls' Attitudes survey with girls and young women aged 11 to 21 showed that 53% aged 11-21 think bloggers and YouTubers create the idea of being perfect that is unrealistic and unachievable; 22% have tried a diet after hearing about a celebrity using it.</p> <p>States that the use of filters, airbrushing and image editing is normalised in influencer culture and constant exposure to images and videos of influencers with 'flawless skin' or 'perfect body' could potentially lead to girls' and young women's desire to change their appearance. GG's 2019 Girl's Attitudes survey found that showed 71% of girls and young women aged 11 to 21 filter the pictures they post on social media most of the time or sometimes. Whilst this can be sometimes for fun, their 2020 survey found that 48% of girls and young women aged 11 to 21 said they regularly use apps or filters to make photos of themselves look better online. In 2018, almost a third of girls and young women aged 11 to 21 say they would consider cosmetic procedures such as Botox or lip fillers (30%) and cosmetic surgery (29%)</p> <p>Believes that the commercial arrangements between influencers and advertisers could be clearer. Policymakers, tech companies, influencers and advertisers should work together to ensure such arrangements are transparent. Considers it is not always clear when an influencer is advertising a product, or when their images are digitally altered.</p> <p>Recommends that there's a consistent way in which influencers advertise online, and for those ads to be labelled more explicitly, as at present they are not always distinguishable from other posts online. Would also support proposals to mandate labelling for all digitally altered images.</p>

3.	<b>MT</b>	<p>Facebook’s (FB) Community Standards and Instagram’s (IG) Community Guidelines are designed to foster an authentic place for inspiration and expression, while encouraging users to respect each other and their diversity of perspectives, beliefs and culture.</p> <p>MT publishes <a href="#">quarterly reports</a> to show how we’re enforcing our policies and to hold ourselves publicly accountable to our progress, as well as having stricter <a href="#">policies for advertising</a>, for <a href="#">branded content</a> and for what should be <a href="#">recommended to people</a> on its apps.</p> <p>Expert partners inform MT that body satisfaction can be caused by a range of factors, which can be genetic, biological and environmental, including body standards in advertising, the media and social media, the diet culture, and an individual’s closer personal environment such as peers and their family. Considers it is important to take proactive steps when it comes to the pressure to look a certain way which some people may feel online.</p> <p>Many gravitates towards FB and IG as places to share their own journeys with self-image and body positivity. Both apps can inspire healthy conversation between community members, and support each other through shared experiences. Social media can play a vital role in destigmatising discussion around body image and is a crucial space for connecting and providing support to people with visible differences. In order to bring more awareness to the body positivity movement, FB and IG partnered with a wide range of body positive creators and organisations. Example: @Instagram account profiled culture change drivers, including <a href="#">Stephanie Yeboah, Nikki Lilly and Megan Crabbe as part of anti-bullying week in the UK to promote and support body positive conversations</a>. Also previously worked with I_Weigh a six part interview series, hosted by Jameela Jamil, which explores identity and life positivity with every episode featuring body positivity conversations.</p> <p>MT also engaged with Changing Faces over the years which led to provisions of a number of rounds of advertising for CF’s campaigns in promoting positivity and preventing hate towards those with visible differences. Also included a direct briefing with MT’s content policy team to share their experiences.</p> <p>Considers it is important that any Code rules take into account that both organic and advertising content may discuss body image or feature different body types, but in a way which seeks to drive positive culture change.</p> <p>Users are subject to the respective Community Standards or Guidelines; MT places additional requirements on advertisers in accordance with its <a href="#">Advertising Policies</a>. These include several measures specifically designed to address issues around negative body image in ads, eg:</p> <ul style="list-style-type: none"> <li>• Ads must not contain "before-and-after" images of weight gain or weight loss.</li> <li>• Ads cannot include images or claims that contain unexpected or unlikely results.</li> <li>• Ad content must also not imply or attempt to generate negative self-perception in order to promote diet, weight loss, or other health related products. Any imagery that idealises or denigrates certain body types and any imagery that calls negative attention to certain appearances or to areas of the body is not allowed.</li> <li>• Ads must not contain deceptive, false or misleading claims, such as those relating to the effectiveness or characteristics of a product or service, including misleading health, employment or weight-loss claims that set unrealistic expectations for users.</li> </ul>
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In relation to ads for weight loss products and cosmetic procedures, branded content must be age-gated to 18+ years. This includes ads for cosmetic surgery, cosmetic procedures, weight loss products, or weight loss services. Previously available targeting options, such as interest-based targeting or targeting based on activity on other apps and websites, will no longer be available.

Users turning 18 will be notified of targeting options that advertisers can use to reach them and the tools that allow users to control ad options. Additional targeting options related to topics users may perceive as sensitive is also no longer available to advertisers from January 2022, such as targeting options referencing causes, organisations, or public figures that relate to health.

Ads are subject to FB's [ad review system](#) before publication, which relies primarily on automated review tools to detect keywords, images, and other signals that may indicate a violation of one of the Advertising Policies. Detection of violation will result in reject of ad. Human reviewers are used to improve and train the automated systems, and in some cases, review specific ads. Acknowledges no such system is perfect and therefore also relies on community and regulators to assist in identifying policy-violating ads. MT may also review and investigate advertiser behaviour, such as repeat violation, severity and attempts to circumvent ad review process. [Sanctions](#) may include losing the ability to advertise on both platforms. Individuals who content that violates MT policies may have their account demonetised so that they can no longer use monetisation features or our Branded Content tool.

MT works on ways to give users the power to control what they see and what others see about them on both platforms. Introduced the option this year for users to hide 'like' counts on their IG feed posts and also on their own posts. This is based on testing if such measure might depressurise users' experience which found that it was beneficial to some users, but not all.

In relation to advertising, additional tools are available to users:

4. [Option](#) to see fewer ads for eg weight loss products on FB and IG. MT has also been working on tools that allow users to manage their experience on IG, inkling topics such as social comparison and body image.
5. 'Take A Break' measure introduced in the UK in December – notifies users that they have been scrolling for a certain amount of time and suggests to users to set reminds to take more breaks in the future, with expert-backed tips to help users reflect and reset. Notifications of the feature are shown to teen users.
6. Time Spent tool – allow users to set limits on time spent on IG each day and review the amount of time spent in the app each week. MT's research, [endorsed by experts](#), found that if people are dwelling on one topic for a while, it could be helpful to nudge them towards other topics at the right moment.

MT looks for expertise and guidance of safety experts, academic researchers, NGOs, human rights activists, and policymakers on body image, eating disorders and wellbeing, given the complexity of the issues. Its policy process involves regular input from experts and organisations, including their [expert advisory group](#), made up of mental health organisations and academics from more than 20 countries. Sought guidance from external experts, including Dr Ysabel Gerrard in the UK, when MT moved to restrict and remove posts about certain weight loss products and cosmetic procedures across FB and IG in 2019.

Introduced new resources [new resources](#) specific to eating disorders, which are shown to users who search for common terms related to eating disorders or body image, prior to showing the search results. UK users will be directed to Beat resources. Users who have shared eating disorder content will also be directed to those resources.



4.	<b>MHF</b>	<p>Findings from session with MHF Young Leaders and OPEN survey revealed a mixed picture in relation to whether online advertising had a greater impact on people’s perception of their body image than traditional marketing. Negative and positive implications vary depending on the way people engage with social media.</p> <p>On the negative side, the targeted nature of social media advertising has the potential to be more predatory, as it can algorithmically exploit insecurities based on a person’s browsing history and social media activity. Adverts that follow people around the internet can seem inescapable and continually reinforce unhealthy messaging about body image. This theme also surfaced in MHF’s engagement with young people as part of the Scottish Government advisory group inquiry, specifically in relation to people with an eating disorder. They reported how algorithms showed ads/content they had been looking at when unwell, and on return to their social media, they found this triggering and damaging to their recovery.</p> <p>MHF Young Leaders felt that influencer marketing on social media can blur the lines between ad content and organic content, which means users are less likely to approach influencer marketing with the same guarded mindset as they might with traditional advertising, making them more vulnerable to subtle, degrading messages about their bodies.</p> <p>On the positive side, Young Leaders felt more able to control their content and only follow people they find relatable or inspiring, but such ability to control is only available to those are tech-savvy. One of the Young Leaders felt more included by the types of people represented in social media advertising because of the marketing content pushed to them.</p> <p>Comments from both Young Leaders and OPEN survey respondents suggest the perceived greater impact of influencer marketing is due to the perceived greater “relatability”. MHF Young Leaders felt that relatability of social media influencers can help people take comfort in situation and appearance, but there is also suspicion about their influence and integrity, especially with digital enhancement or curation of content.</p>
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4. Potential impact of advertising content for specific product sectors		
	Respondent/s	Comments
1.	<b>CF</b>	<p>CF has limited research in this area but research asked why people with a visible difference wear make-up: Of those who wear make-up, around a quarter (24%) say they enjoy wearing make-up and wearing make-up is not to hide their visible difference (23%).</p> <p>CF campaigners reported concerns about the impact that ads for cosmetics, beauty products and cosmetic procedures have had on them. Concerns include ads for cosmetic intervention often contain messaging that undergoing procedures will fix deep self-esteem issues and changing appearance would result in greater confidence. Also promotes the idea that non-surgical procedures such as Botox and fillers are light-hearted and simple, and the idea that there is a perfect body or face ideal that is easily achieved.</p>
2.	<b>EUR</b>	<p>There are not currently many academic studies looking at the impact of cosmetic surgery ads on people’s, specifically, women’s body image. One of the few studies (Ashikali, Dittmar and Ayers (2017)) indicated viewing cosmetic surgery ads negatively affected women’s body image. On the contrary, an earlier study on Australian women (Sharp, Tiggemann and Mattiske (2014)) found a positive relationship between the</p>

		<p>number of cosmetic surgery ads seen and a positive attitude towards cosmetic procedures, but did not find evidence suggesting a negative impact on women's body image. Given few studies are available, it is difficult to draw any conclusions.</p> <p>Notwithstanding, information is available regarding the content of cosmetic surgery ads. Advertising on Instagram and other social media platforms play an important role in enticing consumers, particularly young adults, to undergo cosmetic procedures (Dorfman et al. (2018)).</p> <p>Respondent's upcoming paper (potentially to be published in 2022) illustrates how cosmetic procedures are trivialised by cosmetic clinics which advertise on Instagram. This includes the use of emojis (resonating with younger and potentially more impressionable audience) and emphasis on positive psychological outcomes of procedures. Such interventions become normalised and at times trivialised, without any reference to medical information or risks.</p> <p>Believes in the importance to examine the role of influencers in the promotion of cosmetic procedures and the ethical implications. Respondent has conducted research in this area but results not yet published.</p>
3.	<b>GG</b>	<p>States that certain product sectors are more likely to have an impact on girls' and young women's body image than others, eg beauty and makeup, weight-loss and diet, cosmetic procedures and clothing industries. Such sectors usually target their ads at women as a specific audience, and monetise on their insecurities.</p> <p>In the GG advertising audit, Youth Panel members noted that many ads aimed at women focussed on 'reducing the effects of ageing; did not consider the same pressure for men, thus creating a double standard and unnecessary pressure on women. GG welcomed CAP and BCAP's targeting rules for cosmetic interventions advertising and hoped such restrictions would extend to other appearance-based products. GG's 2021 Girls' Attitudes Survey found that 90% of girls aged 11 to 21 agree there should be stricter rules to stop advertisers bombarding girls and young women with weight loss or 'appearance-improving' adverts online.</p> <p><b>Recommendation:</b></p> <ol style="list-style-type: none"> <li>1. Weight-loss and appearance improving ads are not shown to under-18s</li> <li>2. Greater restrictions on the promotion and sale of diet products to under-18s</li> </ol>
4.	<b>MHF</b>	<p>MHF's 2019 YouGov survey found that of those who responded that images used in advertising caused them to worry about their body image, 72% cited adverts for fashion brands, 46% adverts for weight-loss products/programmes, and 31% adverts for cosmetic surgery. While any adverts using "perfect" bodies to build a sense of aspiration and achievement can cause body image harm, these advertising sectors appear to present the most risk.</p> <p>Considers that ads for dieting and weight-loss products can be a significant source of body image and can be especially harmful due to their relationship with eating. Considers that CAP should ensure weight-loss ads are not promoted to under-18s.</p>

5.	<b>NCB</b>	<p><a href="#">Online survey</a> carried as part of NCB's 2017 report <a href="#">Cosmetic procedures: ethical issues</a> found that nearly 73% of respondents indicated that people's attitudes to cosmetic procedures were influenced by advertising. Whilst research was not representative of the entire UK population, considers the findings offer an insight into public opinion.</p> <p>Referred to a Swiss study for further consideration. Study (Ashikali, Dittmar and Ayers (2016)) suggested that exposure to advertising for cosmetic surgery resulted in women's increased dissatisfaction with both body weight and appearance.</p>
6.	<b>THG</b>	<p>Respondent recommended in August 2021 that regulators introduce a range of measures to restrict under-18's exposure to cosmetic interventions advertising across all channels. Also independently committed to a series of internal protocols to further restrict the extension to which under-18s can view or interact with their marketing content.</p> <p>Welcomed CAP and BCAP's new targeting restrictions on cosmetic interventions advertising. Firmly believes any marketing activities specific to cosmetic interventions sector is only suitable for, and should be only viewed by, adults and must be developed sensitively and appropriately.</p>

<b>5. Positive impact of advertising</b>		
	<b>Respondent/s</b>	<b>Comments</b>
1.	<b>CF</b>	<p>CF recognises that ASA/CAP does not regulate for greater positive representation of visible differences in advertising, but would welcome continuing to work with the ASA to encourage advertisers and brands to consider how they can have a positive impact.</p> <p>Their campaign, Pledge To Be Seen, encourages brands, businesses and institutions to proactively feature people with visible differences in their external communications, including ads; pledgees include Avon UK, Welsh Government and IBM.</p> <p>Believes businesses and brands should commit to showing more people with visible difference, because it's the right thing to do. Additionally, those with visible differences report that if they did see people with a visible difference represented by fashion and beauty brands, two fifths (40%) would have a more positive view of the brand and 3 in 10 (31%) would be more likely to buy that brand's products.</p> <p>CF research finds that 8 in 10 (79%) say they want to see more people with scars, marks and conditions represented in popular culture. Three-quarters (74%) think popular culture is changing to be more inclusive, but people with visible differences are being left behind. Nearly a third (31%) of those surveyed say they feel accepted when they see someone with a visible difference positively represented in adverts and popular culture. If there was more representation of people with visible differences almost 2 in 5 (36%) say it would make them feel more confident and a third (33%) would feel happy. Around a quarter (26%) say increased representation would make it easier to talk to other people about their visible difference.</p> <p>CF campaigners cited examples of positive impact advertising can have on body image perceptions: Dove, Lucy and Yak, Fenty. They report that the impact being feeling 'seen', rather than ignored, forgotten or isolated.</p>
2.	<b>DU</b>	<p>Experimental studies found viewing high BMI female bodies or low-muscularity male bodies results in participants' body size/muscularity preference becoming less extreme compared to start of the experiment.</p>

		<p>Also found presenting bodies in a ‘counter-cultural’ manner (eg high BMI women or low muscle men in clothing coded as high status or more glamorous, while typically ‘idealised’ bodies are presented in a neutral or negative manner) also reduces strength of idealised body preferences.</p> <p>Concludes that inclusion of non-idealised bodies that are presented in a positive way in ads and other media has potential to improve body image of those who do not themselves inhabit idealised bodies; positive body image in those groups will then have downstream benefits in terms of greater likelihood of adaptive health behaviours (eg exercise, positive mood).</p> <p><b>Recommendation:</b> The adoption of existing best practice guidelines of static depictions of larger bodies could encourage body diversity in advertising and encourage respectful non-objectifying portrayals of all bodies (eg depiction of body as functional and as having intrinsic, enduring value rather than presenting its value tethered to its size, shape and/or outward appearance).</p>
3.	<b>EUR</b>	<p>Some studies indicated (eg Diedrichs &amp; Lee, 2011) indicated viewing non-idealised models may have positive effect on a variety of body image outcomes but results are currently inconclusive ((De Lenne, Vandenbosch, Smits &amp; Eggemondt, 2021).</p> <p>There is some evidence that viewing images of average-sized women on Instagram results in better body image when compared to viewing images of thin women (Tiggemann, Anderberg, &amp; Brown, 2020 in Simon &amp; Hurst, 2021).</p>
4.	<b>GG</b>	<p>GG Youth Panel’s advertising audit in 2019 highlighted examples of ads that were perceived to be positive: ads that showed diverse images and content of women and girls that challenge ideal body types or normalised ideas of beauty; ads that spoke openly about taboos girls often encounter such as periods. Panel also welcomed ads that showed women challenging stereotypes such as their active role as a leader or in a sector dominated by men.</p>
5.	<b>MHF</b>	<p>MHF Young Leaders consider that the most powerful way that advertising can be positive is by inspiring feelings of validation and inclusion – representation of a diverse range of people can lead to greater self-confidence and a sense of belonging. Respondents to their OPEN network survey were less forthcoming about the positive impact. Only 8 respondents felt that advertising “very often” or “often” made them feel positive about their body image, compared to 79 who felt that advertising “rarely” or “never” made them feel positive about their body image, though some noted that an improvement in body diversity in ads which has helped self body image perceptions.</p>

<b>6. General comments</b>		
	<b>Respondent/s</b>	<b>Comments</b>
1.	<b>CF</b>	<p>Recommends the following for continued focus/change:</p> <ol style="list-style-type: none"> <li>1. Involve people with visible differences in development of advertising brand campaigns. Considers organisations like the ASA, CAP and BCAP can play an important role, connecting industry bodies and groups with organisations like Changing Faces so we can share experiences of those with visible differences, and help develop better ways of working with underrepresented groups.</li> </ol>

		<ol style="list-style-type: none"> <li>2. OCF campaigners highlighted that clearer labelling on adverts would be much welcomed, so consumers can easily identify when editing and/or filters have been used to create social media content or artwork used in advertisements. This would enable consumers to clearly see the impact of products or services in a truthful way.</li> <li>3. CF previously supported a ban on adverts for cosmetic procedures aimed at under 18s. Considers this should be extended, to also cover face altering apps and filters being advertised, or being used within adverts, to under 18s due to the harmful impact these can have on young people.</li> </ol>
2.	<b>EH</b>	Respondent is a sociologist and author of The Body Hoax. The response is mainly a criticism of CAP and BCAP's evaluation on her submission to the Gender Stereotyping consultation in relation to body image; the evidence referenced in the current submission had been considered in the previous consultation. The respondent did not feel the position that CAP and BCAP arrived at in the GS consultation sufficiently addressed the concerns highlighted by the evidence, which reflects those highlighted in other responses in this call for evidence and existing evidence on body image considered in the cosmetic interventions consultation. The respondent also expressed a lack of confidence in the self-regulatory system in regulating body image issues in advertising and appears to advocate for further Government intervention from the perspective that body image concerns are a public health issue.
3.	<b>GG</b>	<p>Recommends the following ways to reduce the impact that ads have on body image:</p> <ol style="list-style-type: none"> <li>1. Altered images are labelled clearly and consistently on social media posts and advertising;</li> <li>2. Influencers recognise the impact of their posts can have on young people's wellbeing;</li> <li>3. Consistent and clear way influencers advertise online; and</li> <li>4. Social media platforms and the ASA to work together to eliminate body image related harms through the Online Safety Bill.</li> </ol>
4.	<b>LE</b>	LE did not provide substantive commentary but submitted links to a number of body image campaigns, press reporting and reports, including GirlGuiding's Girls' Attitudes Survey, Women and Equalities Committee inquiry <a href="#">report</a> on body image (2021), the Scottish Government Body Image Advisory Group <a href="#">report</a> (2020), the Mental Health Foundation <a href="#">report</a> on body image (2019), the Government Equalities Office <a href="#">report</a> 'Negative body image: causes, consequences & interventions ideas' (2019), the Royal Society of Public Health <a href="#">report</a> on social media and mental health, Be Real Campaign <a href="#">report</a> on the impact of body image anxiety on young people (2017), 5Rights <a href="#">report</a> on children social media accounts being directly targeted with harmful content including eating disorders (2021) and APPG on Body Image <a href="#">report</a> 'Reflects on body image' (2012).
5.	<b>MHF</b>	Considers that own research demonstrates advertising places significant pressure on body image and can be harmful to viewer's mental health. Whilst CAP and BCAP Codes contain rules that could be applied to body image issues, MHF considers that the scale of body image related harm from ads shows there is need to do more in the way that the rules are interpreted.

		<p>Notes that CAP guidance on Social responsibility: Body image, focusses primarily on “unhealthily body image” in the physical health sense, with the underlying rationale being that unhealthy body image is related to striving to achieve a body that is itself unhealthy. Contends that unhealthy body image is much broader – any dissatisfaction with a person’s appearance that causes distresses.</p> <p>Recommends that the guidance updated to reflect broader definition of unhealthy body image and should seek to interpret the existing Code rules to prevent ads from presenting any extreme, unusually flawless, or “perfect” body as aspirational or as a prerequisite for happiness.</p> <p>Considers that ASA and CAP should be especially mindful of the impact that homogenous Western standards of beauty can have on the people it excludes and investigate ways to use their influence to promote more diversity in advertising. CAP may also wish to consider a new standard that recognises body image as a harm that must be avoided, akin to the GS rule.</p>
6.	<b>NCB</b>	<p>Reiterates its call for the ASA, CAP and BCAP to follow TfL’s policy, as highlighted in its 2017 report <a href="#">Cosmetic procedures: ethical issues</a>:</p> <p>“Advertisements will not be approved for, or permitted to remain on TfL’s services if... it could reasonably be seen as likely to cause pressure to conform to an unrealistic or unhealthy body shape, or as likely to create body confidence issues particularly among young people.”</p> <p>Also reiterates further recommendation in its report: there should be a proactive approach to monitor compliance, which would be particularly if any new guidance on body image is introduced as a result of the call for evidence, given that it would be a new area of oversight for the ASA system. Contends that understanding TfL’s processes manage ads which might have a negative impact on body image could be instructive.</p>
7.	<b>THG</b>	<p>Recommends the following:</p> <ol style="list-style-type: none"> <li>1. ASA, CAP and BCAP to conduct specific review of digital image alteration software on the human form and its impact on individuals’ body image. Review should account for nuances surrounding this area, eg an acknowledgement that such software is used to some extent by vast majority of advertisers in a manner that will not have a direct impact on individuals’ perceptions of their own body image. Considers there may be scope for further guidance or regulation in this area, but must be taken in consultation with industry and evidence-based. Considers it is important that consumers have an accurate and authentic representation of the human form, given the extent of young people’s engage with online content, or are able to discern if/when digital alternation had been used to make significant change to a body part. Regulatory intervention could include a requirement on advertisers to include a ‘disclaim’ where such software had been used to alter a body part to a significant degree.</li> <li>2. The ASA, CAP and BCAP create a permanent ‘Body Image Working Group’, involving advertisers, ad service providers, academic experts and third sector organisations to review the need for updates to guidance on an ongoing basis. Creation of such group would be a recognition of the rapidly evolving environment which gives rise to body image related concerns. Essential that all stakeholders engaged in the creation of ad content maintain consistent dialogue to help inform regulation and policy making.</li> </ol>