



## Body image in advertising

### Review update: Digitally altered images

#### 1. Executive summary

In 2022, the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) published an [interim statement](#), as part of their ongoing review on body image in advertising following an [open call for evidence](#) in 2021.

One of the policy areas for which CAP and BCAP committed to undertake further enquiry work, as set out in the interim statement, is the use of digitally altered images in advertising. The objective was to gain an up-to-date understanding of: the nature of the techniques used to digitally alter images in ads, specifically how body parts or proportions can be digitally modified with such tools; any potential for body image related harms arising from the use of such images in advertising; and, as relevant, the advertising regulator's role in mitigating such harms. This included carrying out an in-depth evidence review, consideration of related requirements/practices in overseas' jurisdictions (for example, in France, Israel and Norway), hosting a stakeholder roundtable and considering the potential to commission research.

Today, CAP and BCAP are publishing an update about their progress, including the following next steps they have taken, and are taking, on this strand of their body image in advertising review:

1. To resolve by Spring 2024, whether the existing protections in the Codes and guidance adequately address the potential harms arising from digitally altered body parts and proportions depicted in advertising. This is included as part of the final phase in CAP and BCAP's body image in advertising review (see Section 3 in the Interim Statement [document](#)). CAP and BCAP will continue to take an [evidence-based policy making](#) approach in their assessment;
2. To convene a roundtable involving children and young people to help inform CAP and BCAP's assessment under point 1. To that end, CAP and BCAP hosted a youth roundtable in October 2023, and will report their findings from this action in full in Spring 2024; and
3. To engage with members of the advertising industry to facilitate any wider considerations of industry initiatives intended to address potential harms arising from digitally altered body parts and proportions depicted in advertising.

CAP and BCAP intend to publish the full outcome of their body image in advertising review in Spring 2024.

## 2. Policy background

As authors of the UK Advertising Codes, CAP and BCAP's general policy objective is to set standards to ensure that all marketing communications are legal, decent, honest and truthful and prepared with a due sense of social and professional responsibility. The protection of consumers against harms that can arise from advertising is at the heart of our regulation.

The Advertising Standards Authority (ASA), which independently administers the UK Advertising Codes, has generally considered complaints which raise body image related concerns under UK Advertising Code rules on social responsibility ([CAP Code rule 1.3](#) and [BCAP Code 1.2](#)):

*Marketing communications must be prepared with a sense of responsibility to consumers and to society.*

The ASA has upheld complaints relating to the potential harm that can arise from negative body image in advertising. For example, the ASA has ruled against: ads that feature models who were depicted as being unhealthily thin and suggested such physicality is glamorous or desirable; ads for cosmetic interventions exploiting individuals' insecurities – particularly those of children, young people and vulnerable groups – about their bodies, including by suggesting they would only be confident or happy by undergoing these interventions; ads that suggested happiness or wellbeing depended on conforming to a particular body shape or appearance. CAP guidance, [Social responsibility: Body image](#), summarises the ASA's position on those issues.

In relation to the use of production techniques on images in ads, the ASA has mostly considered those complaints under the Code rules prohibiting misleading advertising. The Code rules ([CAP Code Section 3](#) and [BCAP Code Section 3](#)) on misleading advertising are underpinned by the prohibitions contained within the Consumer Protection from Unfair Trading Regulations 2008 (CPRs). CAP guidance on [Pre- and post- production techniques in cosmetic ads](#) and [Beauty and cosmetic: the use of production techniques](#) advise that whilst techniques such as Photoshopping and social media filters are not inherently problematic in advertising, the use of such techniques on images in ads should not misleadingly exaggerate the effect that a product is capable of achieving. In recent years, the ASA has ruled against a number of influencer ads on Instagram in which post-production techniques, specifically beauty filters, have been used to exaggerate the performance of cosmetic products ([We Are Luxe Ltd](#), [Skinny Tan Ltd](#), [BPerfect Ltd](#), [Charlotte Dawson](#)).

In 2019, the ASA investigated a number of social media ads, including influencer marketing, which promoted weight control products. Amongst other issues, the ASA considered that the ads promoted the body images and lifestyles of the featured influencers as desirable and aspirational and created the impression that it was necessary or advisable for those who were already slim to use the appetite suppressants advertised to lose weight. The ASA also considered that the

influencers' waists in the ads had been digitally altered to look artificially thin that were not representative of their real body shapes, which was particularly irresponsible in the context of the ad. The ASA concluded that the ads were irresponsible and banned the ads ([Protein Revolution Ltd](#), [BoomBod Ltd](#)).

### 3. Political and legislative context

In November 2010, CAP and BCAP was asked by former MP Jo Swinson, on behalf of the Campaign for Body Confidence, to consider adopting several policies concerning the harmful effects of media images on body image and behaviours, including 1) prohibiting ads featuring digitally altered models from being aimed at under-16s and 2) introducing clear labelling of digitally altered models in all other advertising.

At the time, CAP and BCAP published an [evaluation](#) of the studies provided by Jo Swinson against the first suggested policy objective. In relation to the second suggested policy objective, CAP and BCAP understood at that time that further research on the effects of labelling ads that feature airbrushed images was underway and considered it was imperative that the research was available to them before they could reasonably assess the effectiveness of the proposed policy.

The Women and Equalities Committee launched an inquiry in 2020, '[Changing the perfect picture: an inquiry into body image](#)', and published its recommendations including a call on Government to bring forward legislation to restrict or ban the use of altered images in commercial promotion. The Government's [response](#) at the time stated that there was insufficient evidence to conclude legislation on digitally altered images would have the desired impact and further work was needed to build an evidence base to determine the best course of action to address this area.

In 2020, Dr Luke Evans MP introduced a Private Members' Bill – [Digitally Altered Body Images Bill](#) – which would require advertisers, broadcasters and publishers to display a logo in cases where an image of a human body or body part had been digitally altered in its proportions; and for connected purposes. Dr Evans also leads on the [#RecogniseBodyImage](#) campaign, which includes a voluntary pledge that brands, charities and organisation sign-up to show they will not digitally manipulate a person's body proportions in their images.

In July 2022, the Department for Health and Social Care published its [Women's Health Strategy for England](#), which set out commitments to address the mental health and wellbeing needs of young women and girls, including tackling poor body image. In addition to other measures (such as school curriculum material to promote positive mental health and improving access to eating disorder services), the Government acknowledged the possible link between digitally altered body image and mental health, including the potential harms. The Government stated it would consider further proposals to tackle body image issues related to digitally altered images, such as mandatory kite marks, as part of the [Online Advertising Programme](#)

[consultation](#). The Online Advertising Programme consultation, published in March 2022, categorised ads that are seen to contribute to body image concerns as ‘legal but harmful’ ads. On 25 July 2023, the Government published its [response](#) to the consultation and its decision to instead focus on these two categories of harms – harms arising from illegal online advertising and harms towards children and young from ads for products and services that are illegal to be sold to them– in its plans to develop legislation to address the regulation of online advertising

In August 2022, the Health and Social Care Committee (HSCC) published its [report](#) from its inquiry on the impact of body image on mental and physical health. One of the recommendations from the inquiry report includes a call on the Government to work with advertisers to feature a wider variety of body aesthetics, and work with industry and the ASA to encourage advertisers and influencers not to doctor their images. The HSCC believes the 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. The Government published its [response](#) to the inquiry report in February 2023, which acknowledged the possible link between digitally altered body images and mental health and stated that DCMS is considering, through the Online Advertising Programme, how the Government should approach ads that contribute to body image concerns and will work with the ASA and the Incorporated Society of British Advertisers regarding the organisations’ roles in encouraging advertisers and influencers against doctoring images.

#### **4. Stakeholder roundtable**

As part of their enquiry into the use of digitally altered images in advertising and its potential harmful impacts on body image, CAP and BCAP hosted a roundtable discussion in June 2023 which brought together 15 stakeholders representing a range of expertise and backgrounds: advertising industry, media platforms, academics, NGOs, and policy makers.

The roundtable attendees were invited to discuss:

1. What is the extent to which advertising plays a part in contributing body image related harms through the use of digitally altered images? Attendees were asked to have particular regard to the context of prevalent social media use and wide accessibility of digital alteration tools.
2. Which groups are particularly vulnerable to these potential harms?
3. What are the potential measures that could help impactfully address body image related harms arising from digitally altered images in advertising:
  - a. Can advertising restrictions mitigate these harms?
  - b. Are there interventions, beyond advertising restrictions, that can help mitigate these harms?

- c. What are the implications and challenges of these measures?

#### Key summary of the roundtable discussions

There appeared to be a wide consensus among roundtable attendees that there were significant concerns surrounding the use of digital alteration techniques in images, particularly on social media, giving rise to body image harms. It was not easily discernible from the discussions the extent to which such potential harms could be attributed to advertising, but it is evident that many attendees considered advertising is, among others, a contributing factor. During the discussions, children and young people have been highlighted as a demographic group particularly susceptible to the risks of negative body image generally, including from advertising, with many stakeholders citing findings from existing research. Some attendees noted that in addition to girls and women, boys and men, other demographics such as older men and people from minority ethnic backgrounds, can also be impacted.

The majority of the roundtable discussion was focused on the potential measures to address the body image related harms from digitally altered images in advertising and the implications of those measures. It was apparent from the range of viewpoints offered by attendees that identifying the appropriate measures would be a complex task and that no single solution alone, whether related to advertising regulation or otherwise, would be effective and proportionate in mitigating the potential body image related harms from digitally altered images.

Some attendees considered that advertising regulation could play a part in addressing the potential harms, but there were varying views on the appropriate intervention(s). A number of potential regulatory measures were put forward by stakeholders:

1. a prohibition on the use of digital alteration on images in ads;
2. a requirement to label ads that feature images in which body parts or proportions have been digitally altered;
3. the implementation of an evidence standard based on open-source data in implementing the second proposed intervention above. This standard would allow access to a history of any digital alterations carried out on an image used in ads; and
4. a threshold-based digital alteration restriction which prohibits the use of significantly altered images that perpetuate body image harms based on appearance discrimination, relating to, for example, weight, age, key facial and body features.

Some stakeholders noted the evidence base indicates that labels and disclaimers that disclose where body parts or proportions have been digitally altered in an image are ineffective and could, in fact, be detrimental to viewers by drawing further

attention to the altered body parts in the images<sup>1</sup>. They further stated that the current evidence base suggested that featuring and depicting a diversity of bodies in images is greatly effective in addressing negative body image.

Stakeholders were asked whether there were specific types of digital alteration techniques that could harmfully affect viewers' body image perceptions, and whether in their view, there was potential for a threshold-based regulatory intervention in mitigating the body image related harms arising from digitally altered images. Those stakeholders considered that if a threshold-based intervention was proposed, such a threshold could be straightforwardly defined; for example, a prohibition on the use of image-editing techniques in images that perpetuate harms based on wider societal appearance-based discrimination, such as weight stigma or colourism.

Many attendees strongly cautioned that careful consideration must be given to any possible measures intended to mitigate the potential body image related harms from digitally altered images, and in particular, any proposed advertising restrictions, in order to avoid unintended consequences and disproportionate effects. This was in view of the complexities in relation to:

- how images in which body parts or proportions have been altered impact on viewers, including the different ways in which viewers may be exposed to such images in different media and in advertising;
- the various purposes for which image editing techniques are used generally, including some which may not perpetuate negative body image perceptions, such as for comedic or horror effects;
- the degree to which digital alterations of body parts or features would give rise to potential body image related harms;
- how digital alteration would be defined in such proposed restrictions given the range of techniques;
- the extent to which the harmful impact from digitally altered body parts or proportion in images can be attributed to advertising, in comparison to editorial content;
- the evidence base evaluating the lack of, or short term, effectiveness of existing interventions, such as labelling (for example, similar to the legal requirements imposed in Norway<sup>2</sup>, France<sup>3</sup> or Israel) or educational measures; and

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<sup>1</sup> For example, [Tiggemann \(2022\)](#); [McComb, Gobin & Mills \(2020\)](#); [Danthinne, Giorgianni & Rodgers \(2020\)](#); [Paraskeva, Lewis-Smith, & Diedrichs \(2017\)](#), etc.

<sup>2</sup> <https://www.stortinget.no/no/Saker-og-publikasjoner/Saker/Sak/?p=84478>

<sup>3</sup> [https://www.legifrance.gouv.fr/codes/article\\_lc/LEGIARTI000032411563](https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000032411563)



- in relation to more restrictive interventions – such as a prohibition on the use of digital alteration on body parts or proportions, or a requirement to label images in which body parts or proportions have been digitally altered – the potential for some influencers to feel pressured to undergo cosmetic interventions and negatively impact on their mental wellbeing. Such pressure may in turn also be felt by their followers.

Some stakeholders considered that the advertising industry and media owners could take voluntary action and some already had, with tangible results. Those included: a change in internal policy to no longer work with influencers who digitally alter body parts or proportions in their images; a platform policy stipulating that ads which pressure viewers to conform to an unrealistic or unhealthy body shape, or are likely to create body confidence issues, would not be accepted for placement; a call for a more diverse range of bodies to be featured in ads to counteract the harmful impact of the narrow set of body ideals that dominate the images in both media and advertising to which consumers are exposed; additional educational materials for children and young people on digitally altered images and body image can be developed.

One stakeholder pointed to other ways in which CAP and BCAP may facilitate wider debate and considerations within the advertising industry in addressing concerns surrounding digitally altered images in advertising, such as in areas that fall outside the scope of CAP and BCAP's regulation (for example, the diversification of representations and depictions of bodies in ads).

## 5. Next steps

CAP and BCAP would like to thank the attendees of the stakeholder roundtable for their insightful contributions and expertise.

Following consideration of their evidence analysis to date and roundtable attendees' range of viewpoints, CAP and BCAP have taken, and will be taking, the following next steps:

- 1. To resolve by Spring 2024, whether the existing protections in the Codes and guidance adequately address the potential harms arising from digitally altered body parts and proportions depicted in advertising. This is included as part of the final phase in CAP and BCAP's body image in advertising review (see Section 3 in the Interim Statement [document](#))**

During the roundtable discussions, a stakeholder suggested CAP and BCAP should consider proposals to impose a requirement to label images in ads in which body parts or proportions have been digitally altered, similar to those required by law in other jurisdictions such as in Norway, France and Israel.



As part of their work to date on this project strand, CAP and BCAP considered the current evidence base which evaluated the effectiveness of such labels or disclaimers. The evidence base, which mostly involved sample groups comprising girls and women, suggested that such labels or disclaimers do not reduce the tendency in viewers of such images to compare their own appearance with the models depicted, even if they are aware that body parts or proportions in the image have been digitally altered. Some studies further found that those labels drew the viewer's attention more closely to the digitally altered body proportions or body parts than if the label or disclaimer had not been included, which could lead to the opposite of the intended effect. CAP and BCAP's understanding of the evidence base was reaffirmed by the academic stakeholders at the roundtable.

Protecting consumers against potential harms arising from advertising remains at the heart of CAP and BCAP's regulation and any regulatory interventions they implement must be proportionate and necessary. On the basis of the available evidence, CAP and BCAP do not, at present, consider that a requirement to label ads with images in which body parts or proportions have been digitally altered would achieve the intended effect in mitigating potential harmful impact on viewers' body image perception.

CAP and BCAP note from the roundtable discussions the complexities in identifying an appropriate measure in tackling harms from images of digitally altered bodies, and acknowledge the caution expressed by roundtable attendees about the need for careful consideration in respect of proposals for potential regulatory changes. They are also mindful that particular presentations or depictions of bodies in ads, whether or not those have been digitally altered, could equally result in detrimental effects on viewer's body image perceptions.

To that end, and in line with the primary objective of their review on body image in advertising, CAP and BCAP will continue assessing whether the existing protection in the Codes and guidance, and the ASA's application of those, adequately address the potential body image related harms arising from particular body ideals depicted or presented in ads, including the use of digital alteration techniques.

Accordingly, CAP and BCAP will continue to take an [evidence-based policy making](#) approach in such determination and in accordance with their principles on delivering regulation that is proportionate, consistent, transparent, accountable and targeted where action is needed.

It should also be noted that the ASA has taken action against ads in which digitally altered images have been used that were misleading or irresponsible; they will continue to do so and will assess whether or not such ads are compliant on a case-by-case basis.



- 2. To convene a roundtable involving children and young people to help inform CAP and BCAP's assessment under point 1. To that end, CAP and BCAP hosted a youth roundtable in October 2023, and will report their findings from this action in full in Spring 2024**

CAP and BCAP note that children and young people have been highlighted by the stakeholder roundtable attendees as a demographic group particularly susceptible to body image harms more generally. CAP and BCAP have received input from an NGO representing the interests of a particular section within this demographic during the course of their body image in advertising. To ensure, as far as possible, the whole range of perspectives from this group are taken into account, CAP and BCAP decided to convene a separate roundtable for children and young people to inform their determination above.

The youth roundtable, facilitated by Girlguiding and Childnet, took place in October 2023. During the discussions, young participants aged between 14-17 shared comments about their own experiences and observations, and those of their peers, on the use of digitally altered images in advertising, as well as on broader questions about the potential body image related harms arising from advertising, particularly on social media. On digitally altered images in advertising, the participants felt that age and level of maturity, as factors, would affect the ability of young people to easily recognise whether an image had been digitally altered, as well as the potential impact of seeing such images on their body image. This was in addition to the ease and sophisticated nature of digital alteration tools available at present.

CAP and BCAP will publish a fuller set of insights from the youth roundtable as part of their additional communications on body image in advertising review planned for Spring 2024.

- 3. To conduct engagement with members of the advertising industry to facilitate any wider considerations of industry initiatives intended to address potential harms arising from digitally altered body parts and proportions depicted in advertising.**

CAP and BCAP note that some stakeholders at the roundtable called for a greater diversity of bodies to be depicted or represented in ads more, as a means to mitigate the detrimental effects on body image from digitally altered bodies shown in ads and media more generally. The UK Advertising Codes, and the ASA's enforcement of the Codes, do not impose requirements or quotas to include a diverse range of bodies in ad depictions. However, CAP and BCAP consider the insights surfaced during this project strand may help inform any relevant initiatives or wider considerations within the advertising industry.



CAP and BCAP intend to publish the full outcome of their body image in advertising review in Spring 2024.