Response to the Committee of Advertising Practice *Body Image in Advertising: Call for Evidence*

Introduction

Across the UK nearly one in five adults self-identify as having a visible difference such as a mark, scar or condition.

At least 1.3 million children, young people and adults in the UK are estimated to have significant disfigurements, including 569,000 with facial disfigurements.

Changing Faces is the UK's leading charity for everyone who has a mark, scar or condition on their face or body that makes them look different. For 30 years they have been providing advice and support, challenging discrimination, and campaigning for a world that respects difference.

The Changing Faces volunteer campaigners group, who all have lived experience of visible difference, were invited to join Head of Campaigns & Communications, Gill Owen, to discuss the questions posed in the call for evidence document, *Body Image in Advertising: Call for Evidence*, from the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

Campaigners Chrissie, Atholl, Peter, Ryan and Laura joined calls to discuss the questions, whilst campaigners Eleanor and Sophie shared written responses. The campaigner's quotes and responses are identified within our submission below. They sit alongside independent research with adults who self-identify as having a visible difference about the impact of representation of visible differences across popular culture, including adverts.

Our research

Unless otherwise stated, all statistics referenced in this paper are from independent research that Changing Faces commissioned in summer 2021. Savanta ComRes interviewed 1,081 people with a mark, scar or condition that makes them look different online between 15th and 26th July 2021. Data were weighted to be representative of those with a mark, scar or condition that makes them look different by age and gender. This weighting scheme was sourced from a nationally representative public omnibus survey run between 22nd and 24th March 2019. Savanta ComRes is a member of the British Polling Council and abides by its rules.

Research highlights:

- 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.

- 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%).

- 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 (Scotland 37%; Wales 46%). 3 in 10 (31%) would be more likely to buy that brand's products.

- 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.

- 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.

1. Types and themes of ad content that give rise to body image concerns – While concerns about body shapes and sizes featured in advertising remains, CAP and BCAP would like to understand the impact of advertising on body image perceptions based on, for example, facial features, hair and skin, visible differences (a scar, mark or condition either on an individual's face or body that makes them appear different) particularly in view of the prevalence of portrait-style images on social media and the shift in focus on those body parts.

CAP and BCAP would also like to understand the potential impacts on consumers arising from advertising in social media which may subscribe to similar themes found in social media content, such as 'Thinspiration', 'Fitspiration', and 'Wellness'.

One of the biggest issues affecting people's wellbeing and mental health today is negative body image. So imagine the pressure of living in today's world of filters and Photoshop when you look different.

Despite the fact that one fifth of people in the UK self-identify as having a visible difference such as a mark, scar or condition[1], people with visible differences are still largely absent from mainstream culture, from film and TV to advertising and brand campaigns. This woeful lack of representation, combined with shocking daily levels of abuse and harassment, means people with a visible difference experience the harmful impact of poor body image; limiting their lives, aspirations, and ability to achieve simply because of the way they look and how society reacts to their appearance.

Independent research, and our volunteer campaigners tell us that how visible differences are shown, or not, in adverts, as well as other aspects of popular culture, like TV and film, has an impact on body image, mental health and wellbeing.

- 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.

- 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.

In addition to this environment where people with visible differences feel ignored, isolated and excluded, they are also bombarded with messaging from adverts that tell people they can fix their perceived imperfections and become more confident, attractive and successful by changing their outward appearance.

Our campaigners who have contributed to this response didn't strongly feel that there is a prevalence of portrait-style images on social media. Whilst they recognise that some platforms, like Instagram, did for a time focus on portrait style images, 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 for them.

The overarching lack of positive representation and prevalence of adverts to 'fix' imperfections, whether in a portrait or other style, was of far greater concern.

Campaigner, Chrissie, sustained third degree burns on her face, arms, body and thighs as a young child, she explains: "I find that adverts don't relate to me. When I used to pay

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[1] [1] Changing Faces #MyVisibleDifference Report (https://www.changingfaces.org.uk/wp-content/uploads/2019/05/CHANGING-FACES-Report-My-Visible-Difference.pdf) ComRes interviewed 1,037 people with a mark, scar or condition that makes them look different online between 7th and 16th March 2019. Data were weighted to be representative of those with a mark, scar or condition that makes them look different by age, gender and region. This weighting scheme was sourced from a nationally representative public omnibus survey run between the 22nd and 24th March 2019. ComRes is a member of the British Polling Council and abides by its rules.

attention, all I could see was 'perfection' and I knew I couldn't achieve that – I didn't ever see any role models. So I've switched off to advertising now.

"When I was younger, I was influenced though. I used to wear make-up, eyeshadow, eye liner – it felt uncomfortable, but because of peer pressure I did it. I was looking for someone or something to follow – a brand or a celebrity that I connected to. I felt I had to follow someone to be like my friends. When you're young you are looking to find yourself. I didn't fit. I felt like I wanted to hide away because I didn't fit into the perfect look.

"Now, I might use a product like body lotion, but I look for brands that mention dry skin, I won't look for images.

"I get annoyed about adverts for corrective surgery. I didn't feel comfortable or confident until I was in my mid 30s. I know advertisers aren't going to be allowed to target under 18s with ads for cosmetic procedures. But that's still so young. Your body and your mind is still forming, you need to find out who you are. Young people are changing themselves but there's nothing wrong with them. I've learnt to live with my visible difference, it's taken me years, and sometimes I think younger people are targeted as they are easy to prey on and influence.

"There needs to be more transparency around the use of filters and editing too. If they're being used but we're not being told they are, and to what extent, that's not very truthful. If you're advertising but using these techniques, it's wrong, it's not real, I think adverts should have to clearly state that filters or editing has been used. This might help more people realise they don't need to change themselves.

"More adverts about enhancing and celebrating uniqueness is brilliant but messaging about covering and hiding isn't positive at all."

Campaigner, Sophie, who has scars on her forehead and eyebrow following a car accident, shared her thoughts on the adverts she sees: "I feel a lot of adverts I see still focus on people having that 'perfect' face. If promoting a product, I feel the person in the advert almost tries too hard to have blemishes etc and then this miracle cream works. You get these 'before and after' images. The people in these adverts are still your standard 'pretty'. It still doesn't feel relatable to the average person.

"It would be good to see someone who hasn't spent hours in hair and make-up genuinely advertising a product. I feel that, although we are on the way to getting more body diversity in adverts and mainstream media, facial diversity is lacking, if at all represented. It would be good to see someone with more than one 'imperfection'. For example, I have a facial scar and [am] considered overweight. I would never see these two things in one person in an advert."

2. Impact of advertising on self-perception of body image experienced by different audience groups – Recent evidence suggests that body image perceptions may vary across different demographic groups and change over time7. In addition to gender which was explored in the previous ASA report, gender identity, race, ethnicity, sexuality, age, disabilities, health conditions and visible differences may also be a factor in an individual's body image perceptions. CAP and BCAP would like to further understand the potential impact of advertising on consumers who share those characteristics and their body image perceptions.

Every day we receive a constant stream of advertising with messages telling us we need to look a certain way. Adverts portray a very narrow view of beauty, and we are under constant pressure to conform. This pressure can be difficult to deal with, whoever you are. But when you have a mark, scar or condition that means you look different, it is intensified.

Having a visible difference can put people at greater risk of poor body image. Too many people with visible differences endure a daily cycle of comments, stares and appearance related abuse. Added to this, there is a lack of mental health support available to people who have a visible difference.

The COVID-19 pandemic has had a significant impact on children and how they feel about their appearance, Changing Faces research found that just one in four (25%) feel confident about how they look, a fall from 39% in 2018.[2]

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%).

Worryingly, 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.

The experiences of adults demonstrate that appearance related abuse doesn't stop at school. Independent research of over 1,000 people with a visible difference found that seven in ten experience negative behaviours such as stares, abuse and bullying because of how they look[3].

Even though about a fifth of people in the UK self-identify as having a visible difference such as a mark, scar or condition, people with visible differences are still largely absent from mainstream advertising and brand campaigns. They tell us that they rarely see anyone who looks like them.

- 8 in 10 (79%) say they want to see more people with scars, marks and conditions represented in popular culture, including advertisements.
- 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.

[2] https://www.changingfaces.org.uk/news/expanded-support-children-young-people-schools/ e
[3] Changing Faces #VisibleHate campaign (https://www.changingfaces.org.uk/quarter-people-disfigurement-victim-hate-crime). Savanta ComRes interviewed 1,006 people with a mark, scar or condition that makes them look different online between 23 October and 11 November 2019. Data were weighted to be representative of those with a mark, scar or condition that makes them look different by age, gender and region. This weighting scheme was sourced from a nationally representative public omnibus survey run between the 22nd and 24th March 2019. Full data sets: https://comresglobal.com/polls/changing-faces-hate-crime-survey/

- 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.

Campaigner, Ryan, was born with a cleft lip and palate. He explained why those with visible differences think that the advertising industry still has a long way to go to be truly inclusive: "When you have a visible difference, at best you tend to feel ignored by popular culture, and at worst, demonised. More often than not the person with the visible difference is presented as the villain, or as the person to be fixed or the threat – if you don't do something - use a product or service for example, then you could end up looking like 'them'.

"When you have a visible difference associated with your face, you notice that there's a hierarchy of how diverse and inclusive brands, adverts and businesses are willing to be. There's been a lot more inclusion of people with limb differences, skin conditions like vitiligo or autoimmune conditions like alopecia. That's brilliant and so good to see. But advertisers still tend to stay away from the face, they don't want to disrupt the symmetry.

"From my point of view, it feels like generally they keep the face as 'symmetrical' as possible. It's a highly privileged part of the appearance – so it becomes 'challenging' for more people when they notice difference on the face, like craniofacial conditions. It feels deliberate, and we've all been fed the fictional versions – the story tropes of the the scarred villain – so it's safer for advertisers to show differences that affect the face and body but don't create asymmetry – it's a safer interaction with difference, it's a hierarchy of diversity. That doesn't feel good or inclusive."

Campaigner, Laura, has the autoimmune condition, alopecia and eczema. She agreed with Ryan's observations. Laura explains: "We're starting to see more adverts that include people with visible differences, but it feels like it's the palatable version of visible difference. It's verging on tokenistic.

"As a woman with alopecia and eczema I know that there are brands that are happy to feature me, but just one version of me. They are happy for me to be bald but not bald and with a patch of eczema. I also see that in their presentation of a diverse group, they are still showing stereotypical perceptions of facial beauty, rarely featuring someone who has a condition that changes the shape of their face. There's a long way to go."

Several campaigners raised the lack of men with visible differences being seen in advertisements. This absence is having an impact. Our 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.[4] Six in 10 men with a visible difference agree that people react differently to a man with a visible difference than a woman.

The survey, conducted by Savanta ComRes, of over 1,000 men with a visible difference highlighted how men with a visible difference are contending with a double challenge: handling the reactions of others and living in a society where talking about appearance is still more acceptable for women than men.

Two-thirds (64%) of men with visible differences felt negative emotions, such as being embarrassed, worried or afraid, when they realised they looked different.

[4] https://comresglobal.com/polls/changing-faces-male-perspectives-survey/

Our campaigners flagged that they all struggled to think of positive examples of men with visible differences being featured in advertising. In fact, the only male social media influencer they could name was their fellow campaigner, Atholl. They could also name TV presenters and actors, including Changing Faces ambassador, Adam Pearson, but couldn't give any examples of an advertising campaign featuring a man with a visible difference – yet they could all think of at least one positive advertisement featuring a woman with a visible difference.

Campaigner, Peter, has a condition called Sturge Weber syndrome and as part of this has a port wine stain birthmark covering a large part of his face and body. He explained how seeing just one man with a visible difference in an advertisement would be positive: "If I saw a man with a visible difference in an advert that would be amazing - I can honestly say I've never seen someone. It would make me feel good if I did see one!"

Whilst Ryan shared his thoughts: "Because visible difference is generally ignored in advertising, it's the absence which is telling. This is particularly noticeable when it comes to men. Advertising has commodified body positivity – but the market is still focussing on women. Maybe in time advertisers promoting products targeting men will catch up, but it feels at least a decade behind."

Campaigner, Atholl, has cystic hygroma and facial palsy. He shared: "There is more diversity now, but more often than not the first picture is always the 'cookie cutter' or 'Greek God' look. So, a brand will sprinkle in some diversity, they might use a group of people to promote some products on Instagram. The first image you see is the stereotypical 'attractive man', then slide and the person with a difference might be the third or fourth image along.

"Companies clearly pick and choose how they represent diversity – and it still tends to be the most mould fitting version e.g., vitiligo. It's still someone who is seen as 'symmetrical' – it doesn't make me feel great; it's not real representation. When I was younger there wasn't anyone who looked like me to be seen in popular culture, and certainly not in a positive way. It makes you feel like you're not worthy of that platform, be it social media or an advert in a magazine. In fact you feel you shouldn't be seen, because you're literally not seeing yourself. It's time for adverts to push the mould about what being diverse actually means."

We know more positive representation could make a difference, our campaigners, ambassadors and clients using our support services tell us that it would help them feel less alone and help build self-confidence, whilst our latest research found:

- 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.

3. Impact of social media advertising, including influencer marketing, on body image concerns, in light of increased online media use – Given the prevalence of online and social media use, as well as social media influencer marketing, CAP and BCAP seek to understand the extent to which advertising on social media and video sharing platforms, including influencer marketing, may disproportionately influence consumers' body image perceptions.

Together with our campaigners, Changing Faces recognise that social media can be a hugely positive and powerful tool to connect people, create online communities and offer a space to meet and share experiences.

Changing Faces has conducted specific research into the experiences of people with visible differences as they use social media. The research recognises the negative experiences some people with visible differences can have, with one in ten people with a disfigurement saying they are repeatedly harassed on social media.[5]

Our 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%).

The overarching theme discussed by campaigners about the impact of advertising on social media and influencer marketing was the prevalence of advertising - the constant drip feed of advertising when accessing social media for other purposes.

They discussed the challenge of being able to identify when they were seeing an advertisement from a social media influencer, rather than an authentic review. And they also discussed 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.

Changing Faces would welcome more explicit labelling on all forms of advertising to state if editing processes or filters have been used to create an image.

Campaigner Laura explained how she sees the challenge: "It's a whole other relationship that you experience with a social influencer versus traditional media celebrities. When it's an influencer, someone you actively follow, it makes it feel more authentic. On social, yes, influencers may use the #ad #sponsored - but there's still the assumption they've taken the images themselves, it's set up to look like there's a lack of production values – that there's an immediacy to what they've posted. But you can't trust it, you don't know what is really behind the scenes to create that look. We think we're seeing something 'real' but we're not and that can be very negative, it's deceptive – no-one can recreate that look without all the tools they've used as well as the product they're advertising.

"At least with traditional advertising – whilst the messaging they are putting out there about stereotypes and beauty is still hard to put to the back of your mind, you can consciously question it, because it's clear it's an advert. It's difficult – adverts have a lot to do to unteach the unrealistic body 'norms' they've put out there and better represent visible differences. But they can do it, they can make a positive difference. They should have belief in their product, if it's a good quality watch or perfume for example - why can't that watch look beautiful on

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[5] https://comresglobal.com/polls/changing-faces-hate-crime-survey/

my hairless wrist and the perfume smell fantastic on a woman who happens to have one arm."

Sophie is keen that advertisements and influencer marketing are made more transparent, so consumers are better protected: "I follow a couple of 'influencers'. But I feel they are quite relatable and genuine. I think I'm lucky - I've done the hard work on building my self-esteem and I know myself, so I am not easily swayed by them. But young women and men can be easily persuaded, and I think now when influencers are promoting a product, they have to clearly show it's an 'ad' which I think is excellent. It's so transparent for everyone. Influencers are getting more rules as to what and how they post, and I think adverts should follow suit regarding transparency."

Atholl, as well as being a volunteer Changing Faces campaigner, is also an influencer on Tik Tok with a growing following (currently 121.2k followers). He explains how it feels to be an influencer with a visible difference: "For sure, yes, the way people edit what they share on social media means we only get to see a snapshot, the one image they want to share. They'll take 50,000 photos but the one photo they share is edited – it's giving people a false perception of what their lives are like or what they look like. It's set up as though it's just a quick, at home no special equipment selfie, but it's not. It's not real.

"I know influencers that do this, even me, I'll choose the best picture and present what I want you to see – it's not always as real and raw as people may think. Katie Piper often shares more realistic images, alongside her more 'posed' images - but other people don't. Really it can be very damaging for everyone.We're chasing a life and expectations that aren't actually real. I've seen this around diet culture too – people will follow an influencer who says they're following a diet, but it's not real, they may well be doing the diet, but they've also had work done, or trained.

"It can be quite damaging for the person, the influencer, posting too. Being an influencer with a visible difference is hard. I have down days. If I've had a bad day and post about it, I also feel the weight of responsibility to people who follow me and have a visible difference, or some other condition. So many people tell me I inspire them or make them feel less alone – I don't want them to feel upset or down as well. It's a balance – to be honest and relatable but also to show positivity. Now I often just don't post anything at all if I'm not in the right place, mental health wise, to do so."

Chrissie discussed why she thinks it's important for rules to be extended beyond traditional adverts, she explains: "There's all kinds of posts out there. I've heard of posts that show you how to use exercises and stretching techniques to change your face shape, get rid of lines or scars. Exercises can't change the shape of your face – if you had self-confidence and self-esteem you wouldn't follow this type of content. People are looking for answers and being scammed, it's actually quite frightening.

"I think there should be more rules and regulations – if you're pushing for your users to try a filter or an app, even if they don't have to pay to get it, you shouldn't encourage the use of those face changing apps and filters to young people. They could be harmful to that young person's wellbeing, particularly if they have a visible difference. It's sad when you see children and young people who are still developing, and they are being influenced to change themselves. They are being encouraged to look at themselves and instead of having positive messaging sent to them about how they look and the beauty in differences and us all being unique, they are being encouraged to fit into a certain 'look'. It's scary and sad."

Campaigner, Eleanor, has a port wine stain birthmark. She agreed that social media influencers that are posting adverts are hard to distinguish and can have a negative impact: "On billboards and tv ads it's incredibly obvious that it is an advert and there is usually no doubt that it is such. However, it is much more difficult when scrolling through my social media feeds to tell what an advert or a sponsored post is and what is not. Yes, there are regulations that influencers have to post things like #ad or #gifted but many are not at all obvious and somehow hidden in the post.

"It is hard enough when looking through social media to tell what has been edited, photoshopped or filtered let alone trying to figure out if the influencer actually uses the product or if they have been paid to post it. I don't mean that influencers shouldn't be allowed to advertise, but it should be made more apparent. This should be even more important when the product or service is a cosmetic, toiletry or service that is used on your person.

"Another factor that should be considered with social media advertising is the use of filters and editing. I see many influencers advertising products such as teeth whitening, make-up and cosmetic surgery. Whilst it may be obvious that it is a sponsored post, how are we to know that it has not been heavily filtered and edited? As sponsored posts and advertisements are so common on social media there is not enough time in the world to look into every single post and question if it has been edited. So, it leads you to believe that these influencers look exactly like their photos. This becomes very damaging when the content you consume consists of people that look the same and are advertising similar products, it can make you think that these products will make you look the same. What we really need is honest brands who diversify the influencers that they use to include people with visible differences and don't allow the use of editing on the advert that they sponsor."

4. Potential impact of advertising content for specific product sectors – CAP and BCAP are interested in understanding whether, and to what extent, the content and targeting of advertising for certain products or services intended to change an individual's appearance, in particular, could give rise to potential body image related harms. These may include advertising for cosmetic interventions, weight control products, weight reduction regimes and establishments, fitness products or services, beauty and cosmetic products, health related products, clothing (examples include fashion ads, ads for products such as shapewear).

Changing Faces has limited research on the impact of advertising related to specific products or services. We did question 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%).

However, our campaigners have shared their concerns and the impact that the advertising of cosmetics and beauty products, and cosmetic procedures have had on them. Changing Faces also responded to the earlier CAP and BCAP consultation on cosmetic procedures advertising that targeted under 18s. We were pleased to welcome the ruling that such adverts, from May 2022, will no longer be allowed to target young people.

Sophie explains how these adverts have impacted her: "I see ads for cosmetic procedures where a person is, at the start, looking very solemn, then they get a boob job, and they are the life of the party. It is made out that they are actual clients of the company. Although I take these with a pinch of salt, it enforces the idea that cosmetic procedures will fix your problems and if you change your appearance, you will be happier, more confident.

"There is an advert for a skin smoothing oil that doesn't sit right with me, as it is supposed to be a product that helps reduce scarring etc, it makes me feel that I should be using it and that you should have as little evidence of imperfections as possible.

"However, I do feel like it's a fine line. People should be free to do whatever they want to make them feel like their best selves and should be able to do this without being judged. But if it's to put a plaster over a deeper issue then this is when it becomes a problem. I do think certain adverts for things should have an age limit and be transparent if there's been editing. And a hefty fine or some sort of consequence if this is not adhered to. In this day and age, I feel seeing people being normal, 'every day' looks would have nothing but a positive impact."

Eleanor, noted she has concerns around cosmetic procedure adverts: "There has definitely been a rise in cosmetic procedure advertisements as we've seen the likes of reality tv influencers take over social media. It promotes the idea that cosmetic procedures such as lip fillers and Botox are light-hearted and simple. When in reality they are surgical procedures that need to be heavily regulated and shouldn't be advertised on the same platform as clothes and makeup.

"They promote the idea that there is a perfect body or perfect face that is easily achievable. When the reality is far from this and harms the societal treatment of people with visible differences because we often do not fit into this perfect ideal.

"There is also the issue of many influencers claiming to not have had any cosmetic procedures when they have. This again perpetuates the idea that they naturally have a 'perfect body' and this is the normal standard. But they actually have a plastic surgeon, daily hairdresser and make-up artist and would never post an unedited photo. It then harms people with visible differences because many of us don't look like this. It once again means that we face worse societal reactions and treatment because social media is not a transparent place."

5. Positive impact of advertising – As well as considering the potential body image related harms, CAP and BCAP would like to understand the extent to which advertising can be a positive impact on consumers' body image perceptions.

Changing Faces recognises that the ASA does not have the power to regulate for more positive representations of visible differences in advertising, but we would welcome continuing to work with the ASA to encourage advertisers and brands to consider how they can have a positive impact

Our own campaign, Pledge To Be Seen, encourages and celebrates brands, businesses and institutions who proactively feature people with visible differences in their external communications, including adverts.

Beauty brand Avon UK were the first to sign up in 2019, and since then we have seen more organisations, from the Welsh Government to IBM join us.

Our partnership with Avon has been hugely successful. Our shared goal is empowering people who look different to have the freedom to express themselves and be more visible across beauty campaigns. Avon has featured Changing Faces ambassadors in their advertising campaigns, social media and brochures - reaching millions across the UK every week.

Our Nude Lipstick campaign with Avon reached two billion across broadcast, press and social, with 131 pieces of coverage, including 34 nationals. Avon also launched several products raising over £150,000 in support of the charity, chosen carefully with a focus group of Changing Faces ambassadors.

Together we've engaged thousands of Avon representatives across the UK with our partnership, through bespoke inclusivity training, and have run a lunch and learn session attended by hundreds.

Our partnership seen Avon truly taking a lead on diversity and shaking up the beauty industry.

Changing Faces ambassador, and Avon model, Brenda, explained: "Having alopecia and losing my hair left me feeling very out of place - I felt I had no control. By working with Avon on the Her Story launch campaign, I hope to show others that we define what beauty is and being unique is something that should be celebrated."

We believe that businesses and brands should commit to showing more people with visible differences, because it's the right thing to do. But also, of interest to advertisers, 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.

Changing Faces would be very pleased to engage with the advertising industry and explain more about the experience of living life with a visible difference. We can offer practical help, like sharing and advising on language to use to ensure casting requirements are inclusive of and encourage people with visible differences to apply.

Our campaigners report, anecdotally, that they are seeing an increase of diversity within adverts, including people with visible differences. However, seeing a visible difference in an advert is still a rarity. Our research reflects this view, with 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.

We know how positive it can be to see representation of visible difference in adverts. 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.

When asked to think about the positive impact advertising can have on body image perceptions, the overarching theme was around 'feeling seen' rather than ignored, forgotten or isolated. Several campaigners talked about the trailblazing Dove adverts.

Eleanor shared this example: "The Dove TV advertisements stand out ([Dove / Sky Witness: Idents - YouTube](#)) - the proud nature of the women featured in these ads are a brilliant example of how people with visible differences can be featured on large television channels during a prime time show. Showcasing these women who are highlighting their achievements and have visible differences mean that a good conversation is created. It's showing the positive and happy side of them."

Eleanor also shared a recent online advert that had stood out to her: "Lucy and Yak is a sustainable clothing company. This company regularly features people with visible differences modelling their clothes on their website and social media channels. It is one of the very few companies that when I look at their online shop I can see someone who looks like me. I have a port wine stain birthmark on my face. I was on their website recently and saw a model with the same birthmark as mine. At the age of 21 this was the first time I had ever seen a model on an online shop with a birthmark and it was an amazing feeling to finally see that."

Sophie shared her views of some advertisements that have caught her attention for being positive: "I feel the most famous adverts that I think have a positive impact are Rihanna's Fenty products and Kim Kardashian's (somewhat ironically you might think) Skims collections.

"Rihanna's make up and lingerie collections have such a diverse product line. Her make up is available in a broad range of colours to suit a vast majority of skin tones and having read reviews, it's hard to fault. Her underwear too is always modelled by women of all cultures, sizes and is one of the most inclusive brands I've seen. Even in her runway shows.

"Skims is the same. The shapewear is available in a lot of skin tone colours and, again, modelled by a variety of diverse women. The reviews I've read have been mixed but I would say on the whole, they are good. I say it's ironic as Kim and her family have made their fortune on having the 'perfect' body and image, but I think the fact Kim is using all women to model her collections is a massive positive for me. ASOS and BooHoo are also using models with hearing aids, disabilities etc in their adverting of clothes too which is amazing. But I do feel some more facial diversity should be more prevalent. For me, having a facial scar, I would love to see more of that. And more regulation to show transparency would be nothing but beneficial."

Chrissie reflected on the positive impact influencers with visible differences can have on body image perceptions: "The make-up artist and influencer, Ryley, who was on the TV show, Glow Up, she's a positive influencer. Yes, she's showing her birthmark, but her focus is make-up. She is so open about her difference, showing that you can have a choice - sometimes to cover up and sometimes not too. It's great to see that confidence when someone is so young.

"I think it's important to consider skin colour as well as visible difference – it's positive to see more shades of foundation now. But when I'm thinking about mainstream advertising, the only person I can really think of is Katie Piper – I don't see that many others with a visible difference, but we see her. That's great, but I'd like to see more people from different cultures and backgrounds. There's room for more! She's also female. How many male models or influencers do you see with a visible difference? I don't think I've ever seen one advert with a male with a visible difference in it."

Laura explained why an advert caught her attention: "There has recently been an advertisement for the TU Sainsbury's clothing range. It features normal people – they have different body shapes and types. It's inclusive and it feels positive. It's great when you see normal people – in fact it stood out so much I talked about it with friends and family."

Atholl shared how it feels to see diversity in adverts: "The skincare brand, Simple had a 'choose kindness' ad campaign recently. The influencer, Katie Meehan, who has a facial difference was featured. I could walk into Boots and see her, someone like me. It's brilliant – it's a high street brand, in a high street store. It's what I needed to see when I was younger."

"There's also McCains chips, they have an ad and there's someone in a wheelchair. And he's the focus, it's him and his family, it's not being 'done to him' or 'helping him' it's just showing someone with a disability getting on with their daily life, just like everyone else, so refreshing to see."

Summary of Changing Faces suggestions:

Changing Faces is keen to continue to work closely with the ASA, CAP and BCAP. The impact of advertising on the body image perceptions of people with visible differences has been highlighted both through our independent research, and via the personal experiences shared by our campaigners.

We know that positive representation can have a positive impact for people with a visible difference.

Whilst we recognise that regulations can't create 'quotas' of particular body types or people with specific conditions being used by advertisers, we hope that by engaging with consultations like this, we can build positive relationships with professionals in this industry and educate more people about the experience of living life with a visible difference in the UK today so they can bring this information into their planning and thinking.

Changing Faces recommend the following three areas for continued focus or change:

1. Involve people with visible differences in development of advertising brand campaigns. 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.

2. Our campaigners have 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.

3. Changing Faces has previously supported a ban on adverts for cosmetic procedures aimed at under 18s. We think that 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.

Evidence Submission from the Appearance, Culture & Evolution Lab at Durham University.

Contributors:

Prof Lynda Boothroyd, Professor of Psychology, Durham University. Author of prior studies including impacts of media images and media access on body ideals in the UK and rapidly developing populations; currently developing body image education materials for low- and middle-income populations.

Dr Elizabeth Evans, Assistant Professor of Psychology, Durham University. Development and evaluation of interventions for weight management, body image, eating disorder prevention, and public health communication about child overweight/obesity; collaborator with Gateshead Millenium Study team.

Mrs Katy Jacques, A Level Psychology teacher (Royal Grammar Schools, Newcastle) and Doctoral candidate in Psychology, Durham University.

Ms Fabienne Andres, Doctoral candidate in Psychology, Durham University.

1. **Types and themes of ad content that give rise to body image concerns – While concern about body shapes and sizes featured in advertising remains, CAP and BCAP would like to understand the impact of advertising on body image perceptions based on, for example, facial features, hair and skin, visible differences**

Our research expertise is primarily in relation to body size and shape, and thus we confine our comments to this domain where we can most confidently reflect current evidence. The current guidelines regarding presentation of body size/shape are a major improvement on previous guidance and we believe were a vital step forward. However, we have two key points to make regarding content relating to body size/shape where more recent evidence or additional points of note mean material adhering to the guidelines may still be likely to create body image concerns.

1.1 **Existing measures fail to sufficiently address risks from presentation of low weight female figures.**

    1.1.1 *Evidence:* As per the call for evidence, complaints under the guidelines 1.3/1.4 have been upheld "where the images suggest, potentially harmfully, that being unhealthily thin is somehow glamorous or otherwise desirable". This measure does not appropriately mitigate the risks faced by viewers, who are exposed to large numbers of bodies at a given weight extreme (typically underweight female bodies). Such ***risks occur regardless of whether those (underweight) bodies are presented as aspirational***. Our own research using unappealing images of very low weight women[1-3], as well as other studies using neutral images of low weight women, demonstrates that viewers' internalised body ideal or perceptions of 'normal weight' can be affected even when the image presenting thinness as desirable. These effects have been found in British student samples, Australian student samples, online samples, and we 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. As such we are very confident in this evidence.

    1.1.2 *Suggested changes:* Given that visual exposure to high numbers of low weight bodies can be harmful, whether they are presented as aspirational or not, the ASA 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/m^2).

1.2 **Existing guidelines do not include explicitly male muscularity as a dimension of concern despite evidence for muscularity ideals negatively impacting male body image.**

    1.2.1 *Evidence:* While we are glad that the BCAP guidelines target pressure to achieve "idealised gender-stereotypical body shape or physical features", greater attention should be given *in application* to muscularity ideals for young men. Experimental studies in the UK[9,10] and Australia[6] with student and online samples all show consistent evidence that ***muscularity in images (regardless of whether it is positively presented or not) affects perceptions of what a male body should look like***. This creates pressure not only directly on male viewers, but indirectly through broader perpetuation of appearance norms.

1.2.2 *Suggested changes:* First, **CAP 13.3 needs to include muscle-building products** as well as weight-loss products. Second, it is common for media creators wishing to emphasise the muscularity of their models/actors to a) recruit those with very low levels of body fat and b) require them to undertake a period of dehydration to make skin cling more to the muscle underneath (or models/actors may do so themselves). Regulators could therefore **consider specifying a minimum body fat percentage for models/actors in adverts** (e.g. 8-10% for men, 18% for women[11]) and might also consider banning images which suggest such dehydration has taken place. This regulation would address the health needs of the models/actors as well as the mental wellbeing of the viewer.

2. Impact of advertising on self-perception of body image experienced by different audience groups
2.1 Childhood as a critical window for media impacts on body image.

2.1.1 *Evidence:* Although most research concentrates on adolescence and adulthood, it is very well established that a large minority of children experience body dissatisfaction and weight concerns from around the age of five years. Our own work shows that children report internalisation of media ideals from as early as 7 years of age in a sample drawn from both private and state primary schools in County Durham and Newcastle (and indeed that internalisation predicts depressive symptoms and eating disorder risk in the same children)[12.] We have also shown using a representative cohort study in the North East (the Gateshead Millennium Study) that body image concerns at age 7 predict continued dissatisfaction in the teenage years – in other words, these concerns are not transient but track over time.[13,14] As such **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**. As noted above, we have 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[2]. We have also shown in two experimental studies with British schoolchildren (including children from low-income schools, typically low not part of much psychological research) that playing with ultra-thin dolls can change pre-pubertal girls' (5-10 years) perceived ideal body size to be slimmer, increasing risk of body dissatisfaction[15]; this result is consistent with other data in the UK and elsewhere showing that playing with or looking at images of ultra-thin fashion dolls can predict greater body dissatisfaction or thin-ideal internalisation.

2.1.2 *Suggested actions:* 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 clearly warrants a dedicated public and stakeholder consultation process which considers specific regulations around presentation of bodies in children's media including advertising.**

2.2 Body mass as a risk factor for media impacts on body image.

2.2.1 *Evidence*: 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 (largely confined to the US, but sharing much of the same media environment as UK residents) shows these individuals report higher levels of internalised weight stigma and experience discrimination in educational, healthcare and other settings (reviewed by 16, 17). Our research has included interviews with more than 100 4-9-year-old children in England: these revealed 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.[18] **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.** Depiction of people with larger bodies in adverts is partially covered under CAP rule 4.9 and BCAP rule 4.14 but current guidelines do not proactively and explicitly address the issue of weight stigma.

2.2.2 *Suggested actions*: Several national and international obesity associations have set out best practice guidelines for the depiction of people in larger bodies in the media[19,20] and **we recommend that the ASA considers setting out a similar recommendation for best practice for adverts featuring people in larger bodies**. In the main, it would be good to encourage the inclusion of people with bodies of all shapes and

sizes in adverts, but the priority for adverts either focused on or featuring issues around obesity is that portrayals are respectful and avoid dehumanising, objectifying use of images and language.

3. **Positive impact of advertising – As well as considering the potential body image related harms, CAP and BCAP would like to understand the extent to which advertising can be a positive impact on consumers' body image perceptions.**

   3.1 **Typical and non-idealised bodies may normalise body ideals and improve body image**.

   3.1.1 *Evidence:* Across all our experimental studies discussed above[1-3,9,10], we find that viewing high-BMI female bodies or low-muscularity male bodies, results in participants' body size/muscularity preference becoming less extreme. Although all participants generally favour idealised bodies at the start of the experiment (i.e. slim female bodies, somewhat muscular male bodies), these preferences are less exaggerated following exposure to bodies of the opposite type. We also find that presenting bodies in a 'counter-cultural' manner (so 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 way) can also reduce the strength of idealised body preferences. As such, ***inclusion of non-idealised bodies, presented in a positive way, in advertising (and other media) has potential to improve body image of those who do not themselves inhabit idealised bodies.*** Positive body image in these groups will then have downstream benefits in terms of greater likelihood of adaptive health behaviours (e.g. exercise, positive mood).

   3.1.2 *Suggested changes/actions:* As mentioned above, best practice guidelines for static depictions of larger bodies exist (as do image banks of size-positive pictures[21,22]). Such guidelines, if adopted for advertising, might also be extended profitably to ***encourage body diversity in advertising and encourage respectful, non-objectifying portrayals of all bodies.*** Examples of respectful and non-objectifying portrayals might include the depiction of the body as functional (e.g., to move, to interact socially, or to participate in sports) and the body as having intrinsic, enduring value vs value tethered to its size, shape and/or outwards appearance.

Evidence cited:

1. Boothroyd, L.G., Tovee, M.T., & Pollett, T. (2012) Mechanisms of change in body size preferences. *PLoS ONE* e48691
2. Batish, A., *Parchment, A., Tovee, M., & Boothroyd, L. (2019). Body size after-effects are adult-like from 11 years onwards. *PsyRxiv*
3. Boothroyd, L., Pollet, T. V., Evans, E., Yi, Q., & Tovee, M. (2018). Adaptation-like effects in body weight attractiveness are not simply norm based. *PsyRxiv*
4. Winkler, C. and G. Rhodes, *Perceptual adaptation affects attractiveness of female bodies.* British Journal of Psychology, 2005. **96**(2): p. 141-154
5. Glauert, R., et al., (2009) *Body dissatisfaction and the effects of perceptual exposure on body norms and ideals.* International Journal of Eating Disorders, 2009. **42**(5): p. 443-452
6. Sturman, D., et al., Independent Aftereffects of Fat and Muscle: Implications for neural encoding, body space representation, and body image disturbance. Scientific reports, 2017. 7(1): p. 1-8
7. Stephen, I. D., Sturman, D., Stevenson, R. J., Mond, J., & Brooks, K. R. (2018). Visual attention mediates the relationship between body satisfaction and susceptibility to the body size adaptation effect. *PloS one*, *13*(1), e0189855.
8. Brooks, K. R., Clifford, C. W., Stevenson, R. J., Mond, J., & Stephen, I. D. (2018). The high-level basis of body adaptation. *Royal Society open science*, *5*(6), 172103.
9. Jacques, K.A., Evans, E.H. & Boothroyd, L.G**.** (2021). Experimental manipulation of muscularity preferences through visual diet and associative learning. *PLoS One* 16(8): e0255403.
10. Jacques, K., *Hanson, L., & Boothroyd, L. (2021). Influence of exposure to high muscularity bodies on muscularity preferences and body satisfaction in young men. *PsyRxiv*

   Note: all studies above use experimental methods to understand how viewing bodies of one category type (e.g. 'overweight'/hyper-muscular vs lower weight/muscle) distorts viewer's perceptions of what bodies do or should look like (e.g. most attractive body size or most normal body size). Use of baseline testing (before exposure) means that we can be confident that changes are taking place due to the exposure rather than participants starting the study with differing views. Samples are from both the UK and Australia, and China in one case. The majority of participants across studies were White but often include both men and women.

11. Gallagher, D., Heymsfield, S. B., Heo, M., Jebb, S. A., Murgatroyd, P. R., & Sakamoto, Y. (2000). Healthy percentage body fat ranges: an approach for developing guidelines based on body mass index. The American journal of clinical nutrition, 72(3), 694-701.

12. Evans, E., Toveé, M., Boothroyd, L.G. & Drewett, R. (2013) Body dissatisfaction and disordered eating attitudes in 7- to 11-year-old girls: Testing a sociocultural model. *Body Image*, *10*, 8-15

13. Evans E, Adamson A, Basterfield L, LeCouteur AS, Reilly JK, Reilly JJ, Parkinson K. <u>Risk factors for eating disorder symptoms at 12 years of age: A 6-year longitudinal cohort study</u>. *Appetite* 2017, 108, 12-20.

    Evans E, Adamson A, Basterfield L, LeCouteur AS, Reilly JK, Reilly JJ, Parkinson K. "Do disordered eating and body dissatisfaction develop differently in boys and girls? An eight-year longitudinal cohort study". Presented at Appearance Matters Conference, 2016; London.

    Note: References 12-14 are all survey based studies of children in North East England. Samples are broadly (12) or deliberately (13,14) representative of that region, and thus provide important evidence about both prevalence, and also predictors over time (13,14) of body concerns in English children.

14. Boothroyd, L.G., Tovée, M.J. & Evans, E.H. (2021). Can realistic dolls protect body satisfaction in young girls? *Body Image 37*: 172-180.
    Note: an experimental study using children from both low- and middle-income schools, mainly in Northern England, using experimental methods as in studies 1-10, with the same benefits for establishing causation.

15. Puhl, R. M., & Lessard, L. M. (2020). Weight stigma in youth: prevalence, consequences, and considerations for clinical practice. *Current obesity reports*, 1-10.

16. Tomiyama, A. J., Carr, D., Granberg, E. M., Major, B., Robinson, E., Sutin, A. R., & Brewis, A. (2018). How and why weight stigma drives the obesity 'epidemic' and harms health. *BMC medicine*, 16(1), 1-6.

17. Evans, E.H., Fielden, A.L, Hill, A.J. (2019) "Everyone doesn't want to play with her any more": children's emerging understandings of body weight change and weight bias: an interview study with 4-9-year-olds. 26th European Congress on obesity (ECO 2019), Glasgow UK. *Obesity facts 12*(suppl 1) VIII

18. Joint guidelines for media portrayals of individuals affected by obesity from the Rudd Center for Food Policy and Obesity, The Obesity Society (TOS) and the Obesity Action Coalition (OAC), <u>MediaGuidelines_PortrayalObese(1).pdf (uconn.edu)</u>

19. The World Obesity Federation guidelines for reporting on obesity, <u>Guidelines | World Obesity Federation</u>

20. European Association for the Study of Obesity Image Bank, <u>Obesity Image Bank - EASO</u>

21. The Obesity Action Coalition Image Gallery, <u>OAC Image Gallery - Obesity Action Coalition</u>

Body Image in Advertising: Call for Evidence

Written evidence submission from Dr Emily Newman, and the Eating Disorders and Behaviours Research Group, Clinical and Health Psychology, University of Edinburgh.

Submitted to Committee of Advertising Practice and Broadcast Committee of Advertising Practice: January 2022

1. The respondents

The authors are researchers in Clinical and Health Psychology, University of Edinburgh, and members of the University's Eating Disorders and Behaviours research group. This research group looks at risk factors for disordered eating attitudes, eating behaviours, and body image, as well as testing body image and disordered eating interventions. We have a programme of research related to the effect of social media images and online advertisements on body image and eating, which is of particular relevance to this call for evidence.

2. Evidence summary

For this call, we are submitting evidence relating to 1). Types and themes of advertising content that give rise to body image concerns, 4). Potential impact of advertising content for specific product sectors, and 5). Positive impact of advertising.

To summarise, across a series of experimental studies, we have found that:

- 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 (Study 1, Study 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 (Study 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 (Study 4)

All evidence outlined below relates to recently conducted work by our group that is not yet published in journal articles, but has in part been presented at academic conferences. All studies received a favourable outcome from the department's ethics committee before proceeding.

3. Study details

Study 1: Thin ideal versus not thin ideal fashion advertising images and women's body image *(conducted by Khandelwal, Irving, and Newman, unpublished data)*

Study aims
This study looked at the impact of short-term exposure to advertising campaigns featuring either models with bodies conforming to the thin ideal, or models with bodies not conforming to the thin ideal (of various sizes). The thin ideal refers to the idea portrayed to women 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.

Images
We focused specifically on advertising for swimwear, where the model's body shape and size are very visible. Images were sourced from fashion brand account posts on Instagram. Images for the thin ideal condition were taken from Victoria's Secret, Beach Bunny and Topshop posts, while images for the not thin ideal condition were sourced from Marks and Spencer, Aerie, and Ann Summers. The latter set of images showed women with a range of body sizes, but excluded any images showing bodies that met the thin ideal. Images were selected by the researchers as meeting the criteria of conditions. Images all featured young women and were static images, rather than videos.

Participants
Our participants were 80 young women, aged 18 to 25, who were based in the UK (mean age = 22.33 years, SD = 2.09). Participants were recruited through social media platforms Twitter, Facebook and Instagram, and were able to click on a link to the online study. Participants were informed at the time of recruitment that this study was about their responses to social media clothing campaigns. Full aims were revealed to participants after they had completed all study components.

Experimental procedure

The study was hosted on the online survey platform Qualtrics. Participants were randomly assigned to one of the two image conditions by the software. In the thin condition, participants were shown eight selected images which appeared individually on the screen for five seconds each. In the not thin condition, participants were also shown eight images of women that met the criterion for the not thin condition for five seconds each. State self-esteem and state body image were measured pre and post exposure to the images, using the State Self Esteem Scale (Heatherton & Polivy, 1991) and Body Image States Scale (Cash et al., 2002). The body image scale used measures the individual's evaluation of and feelings about their physical appearance in that specific moment, and higher scores indicate more positive body image.

Results for body image

We used mixed ANOVA and paired samples t tests to explore the effect of time and image condition on state body image. Mixed ANOVA revealed a significant interaction between time and image condition with a large effect size, $F(1, 78)= 43.31$, $p < .001$, $\eta^2_p = .36$. Further analysis revealed that those individuals in the thin ideal image condition had a more negative body image after viewing the images compared with before, (t(40)=4.96, p<.001, d=.77) while those in the not thin ideal condition had a more positive body image after image exposure (t(38)=4.35, p<.001, d=.70). There was no significant difference in body image between image groups at baseline.

Main implication

This 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.

Study 2: Thin ideal versus not thin ideal fashion advertising images and women's body image *(conducted by Horne, Wang and Newman, unpublished data)*

Study aims

This study also looked at the impact of short-term exposure to advertising campaign images featuring either models with bodies conforming to the thin ideal, or models with bodies not conforming to the thin ideal. The study also included a control condition, where participants were shown neutral landscape or travel imagery. Outcome measures were state body image and state self-esteem.

Images

The study focused on advertising for lingerie. As with the first study described, this meant that the shape and size of the model's body was visible to the viewer. All images were static rather than videos and were sourced from posts on Instagram. All advert campaign images were posted from clothing brands' official accounts and depicted a woman modelling the lingerie. Images showing models with bodies conforming to the thin ideal were selected for the thin ideal condition, while images showing models with bodies not conforming to the thin ideal were selected for the not thin ideal condition. Neutral control images were sourced through searching nature and travel accounts on Instagram, and depicted attractive outdoor scenes, including landscapes and cityscapes.

Participants

The study participants were 88 young women, aged between 18 and 30 years, who were social media users (mean age = 25.40 years, SD = 3.11). Participants were recruited through the social media platforms Twitter, Facebook and Instagram and were invited to click on a link to the online study. Participants were informed at the time of recruitment that this study was exploring the impact of social media images on thoughts and feelings about oneself. The full aims were revealed to participants after they had completed all study components.

Experimental procedure

The study was hosted on the online survey platform Qualtrics, and participants were randomly assigned to one of the three image conditions by the software: thin ideal, not thin ideal, neutral. Before and after viewing advert images, participants completed measures of appearance self-esteem and body image, using the State Self Esteem Scale (Heatherton & Polivy, 1991) and Body Image States Scale (Cash et al., 2002). Higher scores represented higher self-esteem about appearance and more positive body image. In between completing these pre and post measures, participants were shown ten images for ten seconds each. They were shown only thin ideal advert images, not thin ideal advert images, or neutral images, depending on their study condition.

Results for body image

Mixed ANOVA and paired samples t tests were used to explore the effect of time and image condition on state body image. Mixed ANOVA revealed a significant interaction between time and image condition with a large effect size, $F(2,75) = 27.76$, $p<.001$, $\eta^2_p = .43$. The neutral image group showed no change in body image after exposure to the images, $t(21) = 1.40$, $p = .18$, $d = .30$). The participants in the thin ideal condition showed a decrease in body image after image exposure ($t(25) = 6.31$, $p<.001$,

d = 1.24) meaning that body image was more negative after viewing the advert campaign images. In contrast, those participants in the not thin ideal condition showed an increase in body image from pre to post image exposure (t(29) = 4.11, p<.001, d = .75), meaning that their body image was more positive after viewing their advertising campaign images. There was no significant difference in body image scores between the three conditions at baseline, i.e. before the experimental procedure.

Main implication

This study replicates the findings from Study 1 above, with the pattern of results suggesting 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, has a positive impact on young women's body image. Results relate to short-term effects of exposure to advertising images only.

Study 3: Muscular ideal versus not muscular ideal fashion images and men's body image (conducted by Griffiths, Lochhead, Guan and Newman, unpublished data)

Study aims

This study looked at 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. Additionally, the study included a neutral condition, which showed the same clothes but not on a model. Outcome measures were state body image and state self-esteem.

Images

Static images were sourced from fashion websites with a young male market. The image set featured pictures of clothing from River Island, H&M, ASOS, and Savage X Fenty. Images were selected to represent the three conditions: garment shown on male model with a body meeting the muscular ideal, garment shown on male model not conforming to the muscular ideal (in most cases, the model had a larger body than the muscular ideal, with visible fat), and garment shown on its own (without a model). Images included a range of garments (jeans, underpants, shorts, trousers, t shirt), and were consistent across conditions by item type and colour (e.g. red shorts were depicted in all three conditions). The images showed models or garments on their own against a plain background, and were representative of online shopping/catalogue images rather than more elaborate magazine or social media type advertisements with text.

Participants

Study participants were 235 young men, aged between 18 and 35 years (mean age = 24.21 years, SD = 3.71). Participants were recruited through the social media platforms Twitter, Facebook and Instagram and accessed the online survey by clicking on a weblink. Participants were informed at the time of recruitment that this study was investigating the effects of fashion campaigns and brand advertising trends in men, but were not informed about the different experimental conditions or the researchers' hypotheses. Full aims of the study were revealed to participants after they had completed all study components.

Experimental procedure

The study was hosted on the online survey platform Qualtrics, which randomly allocated participants to one of the three image conditions (muscular ideal, not muscular ideal, no model). In each condition, participants were shown a series of ten images matching the condition image criteria, with each image appearing individually on the screen for ten seconds. State self-esteem and state body image were measured pre and post exposure to the images, using the State Self Esteem Scale (Heatherton & Polivy, 1991) and Body Image States Scale (Cash et al., 2002). Higher scores indicated greater self-esteem and more positive body image.

Results for body image

We used mixed ANOVA and paired samples t tests to explore the effect of time and image condition on state body image. Mixed ANOVA revealed a significant interaction between time and image condition, $F(2, 232)= 4.36$, $p = .014$, $\eta_{p}^{2}= .04$. This can be interpreted as a small effect size. Analysis of change within groups showed that there was no change in body image scores for those participants in the control group, shown garments without models (t(75) = .99, p = .32, d = .11). In those in the muscular ideal condition, there was also no significant change in body image scores from pre to post image exposure (t(77) = 1.18, p = .24, d = .13). There was a significant change in scores in the not muscular ideal condition, where a more positive body image was reported after being shown the images (t(80) = 2.95, p = .004, d = .33). There was no significant difference in body image between conditions at baseline.

Main implication

This 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.

Study 4: Beauty product advertising and women's body image *(conducted by Xu and Newman, unpublished data)*

Study aims

This study looked at the impact of short-term exposure to different forms of messaging within beauty advertising campaigns, primarily aimed at female consumers. The types of messaging considered were objectification, self-objectification, and empowerment. Beauty products were considered to include make-up, perfumes, and skincare items. Outcome measures were state body image, mood, and self-esteem.

Advertising images and messaging

Beauty product advertisements were sourced from two websites: www.admango.com and www.adbug.cn. Advertisements available to a Chinese audience were selected. Those adverts considered to include an objectification message showed a woman as subservient to a man and/or a woman acting as a prop (based on Baxter, 2015). Adverts 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. Adverts 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 (also based on Baxter, 2015). All adverts featured women, sometimes alongside other women or men, and were static images rather than a video-based advert, such as would be seen in magazines or on social media. Furthermore, brand names were blurred so that participants would focus on the advert's content rather than the brand.

Participants

Our study participants were 116 young Chinese women, aged 18 to 35 years, who had never lived outside of China for more than six months (mean age = 22.84 years, SD = 3.31). Participants were recruited through social media platforms Weibo, WeChat, and cosmetics groups at www.douban.com. Participants were provided with a link to an online study, and informed that the topic of exploration

was attitudes towards beauty advertisements. The full aims were revealed to participants after they had completed all study components.

Experimental procedure

The study was hosted on the online survey platform Qualtrics, which randomly assigned participants to one of the three study image conditions (objectifying, self-objectifying and empowering). Participants completed measures of self-esteem, happy mood, and body image before being exposed to advertisements and then again after exposure. In each condition, participants were shown ten images belonging to the advertisement message type, with each image present on the screen for ten seconds before moving onto the next. Measures used were the State Self Esteem Scale (Heatherton & Polivy, 1991; Chinese translation taken from Lan, 2008), Body Image States Scale (Cash et al., 2002; Chinese version from Li, 2013), and a visual analogue scale for current level of happiness (where participants rate current mood from sad to happy on a slider scale). All these scales asked participants to evaluate their mood, self-esteem and body image in the present moment, and higher scores indicated higher self-esteem, happier mood, and more positive body image. Alongside the main outcome measures, participants provided height and weight for calculation of body mass index (BMI), completed a measure of internalisation of media appearance ideals (Internalisation – General scale of the Sociocultural Attitudes towards Appearance Questionnaire-3, Thompson et al., 2004; Chinese version by Liu, 2009), and their frequency of following trends in beauty and fashion (single item with 6 response options, from once a month or less to more than one every day; designed by study authors).

Results for body image

Data were analysed using ANCOVA, with advert message condition as the independent variable, and body image as the dependent variable. Covariates included in the statistical model were the participants' pre advert exposure body image scores, BMI, internalisation of media appearance ideals, and frequency of following beauty information, to control for the influence of these variables. There was no difference in body image scores between the image groups before exposure to the advertisements. ANCOVA revealed a significant effect of advert messaging condition on body image, $F(2, 107) = 3.35$, $p=.04$, $\eta_{p}^{2}= .06$. The effect size can be interpreted as small to medium. Estimated means and pairwise comparisons showed that body image post image exposure was significantly more positive in the empowering messaging group than in the self-objectification and objectification conditions. There was no significant difference in body image between the self-objectification and objectification groups.

Main implication

The results suggest that 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. These results only relate to short-term effects of exposure to beauty advertising images.

References

Baxter, A. (2015). Faux activism in recent female-empowering advertising. *Elon Journal of Undergraduate Research in Communications*, *6*(1).

Cash, T. F., Fleming, E. C., Alindogan, J., Steadman, L., & Whitehead, A. (2002). Beyond body image as a trait: The development and validation of the Body Image States Scale. *Eating Disorders*, *10*, 103-113.

Heatherton, T. F., & Polivy, J. (1991). Development and validation of a scale for measuring state self-esteem. *Journal of Personality and Social Psychology*, *60*, 895.

Lan, X. (2008). *An experimental research on stability of the self-esteem of depressive college student.* (unpublished master's thesis). Southwest University, Chongqing, China. Retrieved from http://cdmd.cnki.com.cn/Article/CDMD-10635-2008092878.htm

Li, Z. (2013). *Peer influence on female's body image.* (Unpublished master's thesis). Nanjing Normal University, Nanjing, China.

Liu, D. Q. (2009). *Body image in Chinese college students: Mass media and peer influences* (Master's thesis). Xiamen University, Xiamen, Fujian, PR China.

Thompson, J. K., Van Den Berg, P., Roehrig, M., Guarda, A. S., & Heinberg, L. J. (2004). The sociocultural attitudes towards appearance scale-3 (SATAQ-3): Development and validation. *International Journal of Eating Disorders*, *35*, 293-304.

Excerpts from the book *The Body Hoax* by me, Emi Howe, available on Amazon

The Research Begins…

- More than 100 studies have demonstrated the links between negative body image and the media. They also provide evidence that body image dissatisfaction impacts disordered eating. [i], [ii]

- '…ample empirical research is available documenting associations between idealised images of female (and increasingly male) beauty and negative effects on women's physical, psychological, and social well-being.' [iii]

   '…negative body image has been considered a public health concern.'[iv]

- 'People are often unaware – and mass media work hard to keep it that way – of the extent to which, and just exactly how (they) play an important role in promoting consumerism, body objectification and internalisation of the current beauty ideal.' (López-Guimerà et al, 2010[v])

- '50% of girls report being dissatisfied with their bodies, regardless of size.' [vi]

- Among leading sources of disability among young women, eating disorders are among the top ten and of all mental disorders, anorexia reflects the highest mortality rate.[vii]

- '55% of children have been bullied about their appearance 40% of these experienced bullying at least once a week.'[viii]

I submitted a letter to the offices of the ASA informing them of their responsibility and highlighting the contradiction: The Codes of Advertising Practice, which informs the UK Advertising Standards Authority, are not doing their job. The ASA's purpose states that:
  'Our mission is to make every UK ad a responsible ad.'[ix] My assessment of the ASA's focus, however, was that in practice the concept of "responsibility" was being interpretated far too narrowly and was, as a result, completely missing the point when it comes to body image in advertising.

As an authority of standards, for CAP and the ASA to achieve their aim of "responsible" ads they must consider that concept from all perspectives; by focusing primarily on responding to what those who are sufficiently motivated to complain consider to be misleading or offensive, they are missing a huge element of their own aim. As we are all impacted by The Glitch (warped body image standards), it isn't surprising that we aren't complaining about adverts that perpetuate it. We have been conditioned to expect it. So if the ASA is just led purely by what gets complained about, then it risks failing to regulate an issue that it, as the standards authority, should take some responsibility for.

And I start to get really frustrated. This research is literally the tip of the iceberg of what's out there. This conversation is going on in many places. Why are we doing nothing about it? Why do we think, this is 'not our problem'?

An impossible standard has been set.

The Gender Stereotype Public Consultation for the ASA

My response

I compiled a report of my findings, it was a 7000 word document! I have condensed it for you here. My main objective was to outline the clear risk to health and wellbeing that the current status quo creates. I have looked at the work of body image researchers Gemma López-Guimerà and Shelly Grabe, who conducted meta-analysis (the results of many studies) to draw their conclusions, amongst many others.

**Is the research on the body image/media connection
sufficient and reliable?**

- Almost twenty years ago Stice and Shaw [x] identified more than a hundred studies where findings showed evidence that 'body image disturbance' informs and predicts eating disorders. Today the research on this subject is vast.

- 'Overall, many well controlled, randomised experiments have demonstrated an effect of the thin-ideal media on women's body image… the majority of evidence from these experiments indicated that brief exposure to the thin ideal body often leads to short-term adverse outcomes in women's body image and related concerns.' Grabe, 2008[xi]

- What is the causal link, why is it a problem? It is a problem because, 'viewers begin to accept media portrayals as reality.' [xii]

  'A finding linking media exposure to disordered eating behaviours and beliefs should warrant public attention.'
  Shelly Grabe, 2008[xiii]

Does the media impact on body image?

- 'A substantial portion of media content consumed by children is replete with unhealthy messages about the beauty ideal, body size, food, weight control and gender roles.'(Greenberg et al 2009[xiv])

- 'Adolescents are extremely influenced by external factors today. Such factors include, but are not limited to, family, religion, education, technology, and media. 'Among these, the mass media have been

identified as the most pervasive and the most powerful.' (UK Essays, 2018[xv])

- 'Evidence is accumulating that repeated exposure to media and to both the direct and indirect (via media's effect on peers, parents, physicians, etc.) pressure from media to be thin, constitutes a risk factor for body dissatisfaction, concerns overweight, and disordered eating behaviours in adolescent girls and young women.' (López-Guimerà et al., 2010).[xvi]

- It's getting worse not better: '…we found that the effects were stronger in the 2000s compared with the 1990s.'
(Grabe, 2008[xvii])

- 'It makes you feel disheartened. As if you're not going to be good enough until you're like anorexically thin' Age 15 from Devon, (Be Real, 2018)[xviii]

I finished my report with: What would Change look like?

- 'Interestingly, Dittmar and Howard (2004) found that women reported less body-focused anxiety after exposure to attractive, average-sized models than after exposure to no models; the lowered anxiety, in a sense, demonstrates a relief effect. Importantly for the advertising industry, research in this area has also demonstrated that when average-sized models and ultra-thin models are equally attractive, they are also perceived as equally effective in advertising a product.' (In Grabe et. al., 2008[xix])

- Change would require a shift, 'a culture change across industry' (British Youth Council, 2017[xx]). It would mean advertisers would need to get creative around how to sell products using a different format and narrative. Attitudes and norms would need to adjust as the public consciousness around this issue is raised.

And Another Thing

I also questioned CAP's confidence in being a self-regulating system. From CAP:
   'By practicing self-regulation, the marketing community ensures the integrity of advertising, promotions and direct marketing.'[xxi]
   This is specious logic and not one that is implemented in other industries throughout society – yeah, those folks are getting it seriously wrong, let's just leave them to it! No, there'd be investigations, reports, think tanks, revised legislation (which apparently you are doing – please make it worthwhile)... In cases where constructs are harming wider society, self-regulation is not implemented as an adequate solution. From an onlooker's perspective, it is a rather convenient strategy for an industry which,

historically has appeared very reluctant to tackle this issue. What's more, it seems to enable the industry's self-interest, especially in the face of claims that manipulations of insecurities are a driving force in advertising, as laid out in documentaries *Embrace* and *The Illusionists*.

To Conclude:

As in the case of smoking adverts of the past, the time is now to acknowledge the harmful effects of thin-ideal body image adverts, accept that even minimal exposure causes harm and more than 'self-regulation' is required if 'self-regulation' looks like this.

If CAP want to keep using their tag-line, 'legal, decent, honest and truthful'[xxii], and the ASA want 'Every UK ad to be a responsible ad', they need to consider how the values of wellbeing, support, inclusivity and compassion fit into their code and ask themselves why they aren't more demanding of their industry to better reflects those 'decent' values. If they really do care about 'unequal or harmful outcomes for adults and children'[xxiii], CAP and ASA cannot ignore this issue any further.

I sent my report to: The ASA, M&S, to MP's Mike Amesbury (my MP), the Minister of State for Women, Minister of State for Digital and Creative Industries, Minister of State for Education and to the Royal Family.

What the report *actually* said.

'Young people are more likely to be dissatisfied with their bodies if they are constantly surrounded by unrepresentative and unattainable ideals. The first part of this chapter considers what measures could be taken…

   …the use of idealised body images in advertising is one of the factors which contributes to poor body image. In 2012 (Emi: 2012! Nearly a decade ago!) the APPG (All Party Parliamentary Group) on Body Image recommended that advertisers develop campaigns that more accurately reflect the diversity of the population. This was echoed by a number of our witnesses. For instance, Natasha Devon (Emi: MBE and fantastic advocate for body image and mental health) emphasised the need to use images of people 'of all shapes, sizes, ages and races' in advertising, so that 'the message we get is that there are lots of different ways to be attractive'.

   The *Be Real Campaign* encourages organisations to sign up to their 'Body Image Pledge'. This involves using adverts which reflect the diversity of the UK; showing people as they are in real life (with alterations limited to technical corrections); promoting a healthy appearance; and promote the pledge. As Liam Preston, Senior Parliamentary and Policy Officer at the YMCA, and co-ordinator of the campaign told us:

   'When you start to see people who look like you, who sound like you and who reflect your choices in life, that is when you start to feel more confident in yourself. So that for us was what we put front and centre of our body image pledge.'

   Kate Dale and Liam Preston welcomed the support of brands in their campaigns. However, there is some concern that even those organisations who claim to be body positive are still perpetuating harmful norms. For instance *The Beauty Demands Network* (an academic-run multi-disciplinary network) suggested that, while advertisers may be using 'larger, fuller, fatter figures', this is 'often while conforming to other features of the contemporary beauty ideal.' In other words, brands may pay lip service to the idea of diversity but continue to emphasise the message that some conventional ideals of beauty are important.

   The Committee welcomes the Advertising Standards Agency project in relation to harmful gender stereotypes, which we know can contribute to poor body image, and its commitment to formulate stricter rules in this respect. We agree that the rules on inappropriate sexualisation and adverts which suggest that it is acceptable to be unhealthily thin need clarification and look forward to the Committee of Advertising Practice bringing forward new rules which reflect this evidence by the end of the year (2017). However, regulation is only part of the answer – we also

need to see a culture change across industry. This involves brands committing to using more diverse models and paying more than lip service to the commitment.' [xxiv]

This report outlines everything I want to achieve, everything the research is pointing at and is not just about 'time spent online' but is, instead, clearly focused on advertising. It is also being, as far as I can tell, entirely ignored.

The results are in and I get a reply! I could see that alongside myself, others to comment were: The National Education Union, Girl Guiding, The Equality and Human Rights Commission. As an aside I do have a problem that this *public* document is written in legalese. I find it hard work. The response positions CAP as being in 'agreement' with everything they can, while using a lot of waffle. This in an attempt to hide their refusal to address the points raised – that's the basic message. The consultation respondents offer plenty of evidence to suggest that body image is *very* much a harmful issue, even a gender stereotypical one - if all girls are to believe they have to be thin and all boys strong.

CAP's direct response to my comments:[xxv]

'As noted in the consultation, CAP and BCAP consider that advertising is obviously not the only influence that can reinforce gender stereotypes, but the evidence indicates it does play a role. Their proposed new rule and guidance are intended to respond proportionately to the potential for harm that can arise from the depiction of these kinds of stereotypes in advertising. CAP and BCAP consider that the weight of evidence suggests that, while not all stereotypes are harmful or offensive, certain gender stereotypes can lead to mental, physical or social harm which can affect how people interact with each other and the way they perceive themselves wherever they appear.

CAP and BCAP note that advertising regulation in the UK works on the principle of imposing standards in order to prevent ads that harm, mislead or offend. The Codes do not impose quotas for inclusion in ads on the basis that this could infringe upon freedom of commercial expression.'[xxvi]

Wow! They just came out and said it. Read that again! Or re-phrased:

Your inclusion doesn't matter as much as our money.

Did they even read my research?

'CAP and BCAP note that the ASA has a strong position which prevents ads from depicting models in a way which makes them appear underweight or unhealthy, and from presenting an unhealthy body image as aspirational, as set out in multiple rulings.' (Then why is it still happening? Everywhere? The ideal body would be unhealthy for most people.)

'CAP and BCAP consider that the evidence around this issue indicates that the most significant potential for harm would arise from an ad suggesting that a person's happiness depends on conforming to an idealised gender-stereotypical body shape. This is reflected in the proposed guidance which states that an ad shouldn't imply that a person's body shape is a significant reason for being unsuccessful romantically or socially.'[xxvii]

That's not enough. It is the norming of thin / idealised bodies. The flooding of messages that there's only one way to be, the use of affective conditioning, linking products to successful lives, certain outcomes that only look a certain way.

So, to round up, the ASA are committed to upholding complaints based only on models being 'unhealthily thin', and not outwardly shaming fat people. Can we have a round of applause please? For them succeeding to put in place the absolute bare minimum standard in response to this public consultation, or the Youth Council Report.

Meanwhile here's what the Girl Guides had to say:

- 89% think the ASA/CAP should publicly commit to making sure they represent all women fairly.

- 77% agree that they should agree not to show airbrushed images of women.

- 37% of girls aged 11 to 21 feel they should try to look more like the pictures of girls and women they see in the media.

- Almost half of girls (45%) sometimes feel ashamed of the way they look because they are not like girls and women in the media. The numbers who feel this way increase from 36% among those aged 11 to 16, to 52% of girls aged 17 to 21.

  39% aged 11 to 21 told us they often stop themselves taking part in fun activities because they are self-conscious about their appearance, and 30% take part less in the classroom/at work because they feel concerned about their appearance.

- Considers that advertisers should have a responsibility to consider the impact of their adverts on consumers' wellbeing. *(But what about their 'commercial expression'!)*

And The National Education Union:
   'Notes the APPG on Body Image heard evidence that girls as young as five were worrying about their size and appearance. That from as young as seven, girls say they feel embarrassed and ashamed of how they look. Considers that challenging gender stereotypes is intrinsic for the promotion of positive body image. Believes this new guidance can play an important role in limiting the production of problematic and stereotypical ideas around body image for children and young people.'[xxviii]

Here's the last I'm going to say on the subject of this consultation. While reading around the issue, I came across the 2017 document: *Depictions, Perceptions and Harm*, on the ASA website.[xxix] On page 37, I found these statements:

'This report assesses the evidence with the intention of isolating the role that advertising might play, if any, in contributing to harm associated with unequal outcomes for adults and children as a result of their gender…

It is evident that the overwhelming majority of research and grey literature on this topic is motivated by a reasonable concern to better understand the causes of real-world indisputable gender inequality – e.g. in relation to pay disparity and sexual violence. It is no surprise, therefore, that much of the evidence concludes that the status quo is not acceptable, and changes should be implemented to address evident inequality.'

This reads to me like, even if compelling research *is* presented, they aren't going to validate it, or assume any responsibility for their role in our culture. Certainly not if research has been 'motivated' by anyone but… ah they're self-regulating… so anyone but them.

It also implies that such complaints are put forward by bumbling idiots who simply can't seem to grapple with 'real world inequalities'. That's how I read it anyway.

What Could the Government Do?

All of this relies on a culture shift of epic proportions! A recalibration. Widespread awareness and the desire to change at the heart of it. But we're on our way…

Besides over 160 references that help to back up this work, my recommendations aren't stand alone, many of them featured in:

The 2016 Body Confidence Event, The Youth Select Committee Report of 2017, were re-iterated in the 2018 ASA public consultation by: The Girl Guides, The Equalities and Human Rights Commission, The National Education Union. Last year in 2020, the Women and Equalities Committee lead an enquiry into poor body image:

'Because it's such a widespread problem, influenced by multiple factors, it's easy to underestimate the real misery it causes – and to so many people. There has been plenty of commentary on the problem, but identifying proposals to tackle it is more challenging. Our inquiry aims to do exactly that: we will be hearing from a wide range of witnesses – both experts and individuals speaking from their own experience, and we will be making recommendations to Government early next year.'[xxx]

On the 9th April 2021, the report was released, among the findings were the following recommendations:

- The Equality and Human Rights Commission should produce guidance for individuals seeking to use the existing Equality Act legislation to challenge appearance-based discrimination within three months.
- Stop using BMI as a measure of individual health
- Immediately **scrap its plans** for calorie labels on food in restaurants, cafes, and takeaways.
- Urgently commission an independent review of its Obesity Strategy and ensure its policies are evidence-based.
- Further encourage the use of diverse and representative images of people in advertising.
- Work closely with the ASA to ensure its future work on body image is inclusive and that substantial changes are implemented after its consultation into online advertising
- Consider what impact banning adverts has on protecting people from developing negative body image.
- Bring forward legislation to restrict or ban the use of altered images in commercial advertising and promotion.

Excerpts taken from online parliament resource entitled: *Government approach to negative body image 'dangerous'.*[xxxi]

This report, like the many before has addressed many of my concerns. However, the suggestion that we 'further **encourage** the use of diverse and representative images of people in advertising' is too lame. What is advertising? Potty training? No they're damaging people's minds and wellbeing. No reference of 'urgency' or 'legislation' for them?

I'll leave you with this quote from Elena Rossini's critically acclaimed *The Illusionists*:

'Across the world there are almost three billion people with an internet connection, 70% of them are online every day… This has the potential to be an almighty digital army that could be mobilised for change. Challenging the status quo, creating healthy media – taking on powerful corporations that profit from our insecurities.'[xxxii]

[i] Stice, E., and Shaw, H.E. (Nov 2002) *Role of body dissatisfaction in the onset and maintenance of eating pathology: A synthesis of research findings*, Journal of psychosomatic research, 53(5). 985-993.

[ii] Grabe, S. et al. (2008) *The Role of the Media in Body Image Concerns Among Women: A Meta-Analysis of Experimental and Correlational Studies* in American Psychological Association 2008 Vol 134, No 3, 460-476

[iii] Thompson et al. in Calgero, R & Thompson J.K. (2007) *The Impact of Western Beauty Ideals on the Lives of Women: A sociocultural perspective*, The body beautiful, 259-298

[iv] Alleva, J. M et al. (2018) *A randomised -controlled trial investigating potential underlying mechanisms of a functionality-based approach to improving women's body image. (Using British Women)* From The Department of Clinical Psychological Science, Maastricht University, Maastricht, The Netherlands, Centre for Appearance Research, University of the West of England, Bristol, UK, Jean Golding Institute, University of Bristol, Bristol, UK. In Journal: Body Image – 25 (2018) 85 – 96

[v] López-Guimerà et al. (2010) *Influence of Mass Media on Body Image and Eating-Disordered Attitudes and Behaviours in Females: A Review of Effects and Processes.* In Media Psychology, 13: 387-416, Taylor and Francis Group, LLC.

[vi] Grabe, S. et al. (2008) *The Role of the Media in Body Image Concerns Among Women: A Meta-Analysis of Experimental and Correlational Studies* in American Psychological Association 2008 Vol 134, No 3, 460-476

[vii] Striegel-Moore, R. H., & Bulik, C. M. (2007). *Risk Factors for Eating Disorders.* American Psychologist.

[viii] Be Real (Feb 2018) *In Your Face: A report investigating young people's experiences of appearance-based bullying. Body Confidence for everyone* In partnership with YMCA and Dove

[ix] ASA (3rd June 2014) *Advertising Standards Authority: Every UK ad a responsible ad* on YouTube www.youtube.com/watch?v=0xjTJoLklvs

[x] Stice, E., and Shaw, H.E. (Nov 2002) *Role of body dissatisfaction in the onset and maintenance of eating pathology: A synthesis of research findings,* Journal of psychosomatic research, 53(5). 985-993.

[xi] Grabe, S. et al. (2008) *The Role of the Media in Body Image Concerns Among Women: A Meta-Analysis of Experimental and Correlational Studies* in American Psychological Association 2008 Vol 134, No 3, 460-476

xii Grabe, S. et al. (2008) *The Role of the Media in Body Image Concerns Among Women: A Meta-Analysis of Experimental and Correlational Studies* in American Psychological Association 2008 Vol 134, No 3, 460-476

xiii Grabe, S. et al. (2008) *The Role of the Media in Body Image Concerns Among Women: A Meta-Analysis of Experimental and Correlational Studies* in American Psychological Association 2008 Vol 134, No 3, 460-476

xiv Greenberg, B. S. et al. (2009) *A Portrait of Food and Drink in commercial TV series.* Health Communication, 24

xv UKEssays. (November 2018). *Mass Media Effects On A Girls Body Image Media Essay.* Retrieved from https://www.ukessays.com/essays/media/mass-media-effects-on-a-girls-body-image-media-essay.php?vref=1

xvi López-Guimerà et al. (2010*) Influence of Mass Media on Body Image and Eating-Disordered Attitudes and Behaviours in Females: A Review of Effects and Processes.* In Media Psychology, 13: 387-416, Taylor and Francis Group, LLC.

xvii Grabe, S. et al. (2008) *The Role of the Media in Body Image Concerns Among Women: A Meta-Analysis of Experimental and Correlational Studies* in American Psychological Association 2008 Vol 134, No 3, 460-476

xviii Be Real (Feb 2018*) In Your Face: A report investigating young people's experiences of appearance-based bullying. Body Confidence for everyone* In partnership with YMCA and Dove

xix Grabe, S. et al. (2008) *The Role of the Media in Body Image Concerns Among Women: A Meta-Analysis of Experimental and Correlational Studies* in American Psychological Association 2008 Vol 134, No 3, 460-476

xx British Youth Council (2017) *A Body Confident Future* – Youth Select Committee.

xxi CAP (2018) *Gender Stereotyping – A Consultation on CAP and BCAP's proposal for a rule and guidance to address the use of gender stereotypes in advertising* – Committee of Advertising Practice – Pg 4

xxii ASA (3rd June 2014) *Advertising Standards Authority: Every UK ad a responsible ad*
 on YouTube www.youtube.com/watch?v=0xjTJoLklvs

xxiii CAP (2018) *Gender Stereotyping – A Consultation on CAP and BCAP's proposal for a rule and guidance to address the use of gender stereotypes in advertising* – Committee of Advertising Practice – Pg 7

xxiv British Youth Council - (2017) *A Body Confident Future* - Youth Select Committee

xxv CAP/BCAP (2018*) Gender stereotypes in advertising CAP and BCAP's evaluation of responses,* https://www.asa.org.uk/uploads/assets/uploaded/03e2fb9c-f878-4c65-81344257b667d1ab.pdf

xxvi CAP/BCAP (2018) *Gender stereotypes in advertising CAP and BCAP's evaluation of responses,* https://www.asa.org.uk/uploads/assets/uploaded/03e2fb9c-f878-4c65-81344257b667d1ab.pdf

xxvii CAP/BCAP (2018) *Gender stereotypes in advertising CAP and BCAP's evaluation of responses,* https://www.asa.org.uk/uploads/assets/uploaded/03e2fb9c-f878-4c65-81344257b667d1ab.pdf

xxviii CAP/BCAP (2018) *Gender stereotypes in advertising CAP and BCAP's evaluation of responses,* https://www.asa.org.uk/uploads/assets/uploaded/03e2fb9c-f878-4c65-81344257b667d1ab.pdf

xxix ASA (2017*) Depictions, Perceptions and Harm, A Report on Gender Stereotypes in Advertising*, www.asa.org.uk/resource/depictions-perceptions-and-harm.html

xxx UK Parliament (2020 *Changing the perfect picture: what can be done about poor body image?* https://committees.parliament.uk/committee/328/women-and-equalities-committee/news/119399/changing-the-perfect-picture-what-can-be-done-about-poor-body-image/

xxxi Women and Equalities Committee (9th April 2021) *Government Approach to body image 'dangerous'* UK parliament. https://committees.parliament.uk/committee/328/women-and-equalities-committee/news/153711/government-approach-to-negative-body-image-dangerous/#:~:text=%22The%20Government%20must%20ensure%20its,ads%20which%20lack%20diverse%20representation.&text=This%20may%20be%20exciting%20for,who%20experience%20body%20image%20anxieties.

xxxii Rossini, E. (2016) *The Illusionists*, https://theillusionists.org/

Call for Evidence – ASA

07/01/2022

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Cosmetic surgery marketing – contents and impact

Unfortunately, not many academic studies have looked at the impact of cosmetic surgery advertising on people's, particularly women's, body image. One of few studies on the topic by Ashikali, Dittmar and Ayers (2017) did indicate that viewing cosmetic surgery advertising negatively affected women's body image. Contrarily, though, an earlier study among Australian women by Sharp, Tiggemann and Mattiske (2014) found a positive relationship between the number of adverts for cosmetic surgery seen and a positive attitude towards cosmetic procedures, but the authors did not find evidence suggesting a negative impact on the women's body image. Nevertheless, as there are few studies available, it is difficult to draw any conclusions at this point.

Unlike the lack of research into the effects of viewing cosmetic surgery advertising on body image in particular, information is available regarding the contents of cosmetic surgery advertising. In particular, we need to be aware of advertising on Instagram and other social media platforms, as we know that these platforms play an important role in enticing consumers, particularly young adults, to undergo cosmetic procedures (cf. Dorfman et al., 2018). The advertising content on social media by cosmetic clinics raises some concern. In a paper that will hopefully be published in 2022, I illustrate how cosmetic procedures are trivialised by cosmetic clinics which advertise their services on Instagram. Using particular emojis – which resonates with a younger, perhaps more influenceable audience – and emphasising the positive psychological outcomes of procedures, these medical interventions are normalised and, at times, even trivialised. Hardly any medical information or mention of risk is included.

Lastly, I believe it is important to look at the role that influencers play when it comes to the promotion of cosmetic procedures and the ethical implications this may have. Together with Sophie Boerman and Jolanda Veldhuis, I have conducted research into this topic, but unfortunately I cannot share the results of this project yet as the results have not been published. However, we hope to be able to share these results soon. Please let us know if you would be interested.

Positive effects non-idealized content

In your Call for Evidence, you also mention that you are interested in the effects of non-idealized content on body image, so I thought I would share some of the studies that I am familiar with. Although some studies (e.g. Diedrichs & Lee, 2011) have indicated that viewing non-idealized models may have a positive effect on a variety of body image outcomes, these results are – as of yet – inconclusive (De Lenne, Vandenbosch, Smits & Eggemondt, 2021). Nevertheless, 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, & Brown, 2020 in Simon & Hurst, 2021).

References

Ashikali, E.-M., Dittmar, H., & Ayers, S. (2017). The impact of cosmetic surgery advertising on Swiss women's body image and attitudes toward cosmetic surgery. *Swiss Journal of Psychology, 76*(1), 13–21.

De Lenne, O., Vandenbosch, L., Smits, T., & Eggermont, S. (2021). Framing real beauty: A framing approach to the effects of beauty advertisements on body image and advertising effectiveness. *Body Image 37*, 255-268.

Diedrichs, P. C., & Lee, C. (2011). Waif goodbye! Average-size female models promote positive body image and appeal to consumers. *Psychology & Health 26*, 1273–1291. https://doi.org/10.1080/08870446.2010.515308

Dorfman, R. G., Vaca, E. E., Mahmood, E., Fine, N. A., & Schierle, C. F. (2018). Plastic surgery-related hashtag utilization on Instagram: Implications for education and marketing. *Aesthetic Surgery Journal 38*(3), 332–338.

Sharp, G., Tiggemann, M., & Mattiske, J. (2014). The role of media and peer influences in Australian women's attitudes towards cosmetic surgery. *Body Image 11*, 482-487.

Simon, K., & Hurst, M. (2021). Body Positivity, but not for everyone: The role of model size in exposure effects on women's mood, body satisfaction, and food choice. *Body Image 39*, 125-130.

Girlguiding's evidence submission to the Advertising Standards Authority's call for evidence on body image

1. Overview

1.1. As the leading charity for girls and young women in the UK, with almost 400,000 young members, and over 100,000 volunteers, our submission is focused on the experiences of girls and young women in particular. We believe it's important that their voices should be listened to, taken seriously and considered when developing effective policy solutions that impact their lives.

1.2. Girlguiding welcomes this call for evidence. We know that low body confidence is a serious issue for many girls and young women that can limit their lives and opportunities.

1.3. Girlguiding has been working for years to change perceptions so that it is understood as a serious social issue with multiple causal factors and addressed by decision makers. We are pleased to see that the Advertising Standards Authority are continuing to consult and implement rules to tackle the issue of body-image related harms in advertising.

1.4. In our 2021 Girls' Attitudes Survey, 94% of girls and young women aged 11 to 21 said more should be done to protect young people from body image pressures online. We believe there is a responsibility on advertising companies to prevent harm, and this includes the harm caused by relentless appearance pressures girls and young women in particular face. Whilst there has been some improvements and examples of positive and diverse content around body image, there have also been intensified and new ways in which industry promotes un-diverse and narrow ideas of beauty or aspirational bodies that cause harm.

1.5. Therefore, in this submission we recommend:
- altered images are labelled clearly and consistently on social media posts and advertising
- weight-loss and appearance improving ads are not shown to under 18s
- greater restrictions on the promotion and sale of diet products to children and young people under 18
- influencers recognise the impact their posts can have on young people's wellbeing
- a consistent and clear way influencers advertise online In this submission, we
- social media companies and the ASA to work together to eliminate body-image related harms through the Online Safety Bill

2. Our evidence

2.1. The *Girls' Attitudes Survey* is Girlguiding's annual research project into the lives of girls and young women, aiming to build a comprehensive picture of the emerging needs, issues and priorities of girls and young women today. The survey provides a snapshot of the views of over 2,000 girls and young women from across the UK aged 7 to 21, within and outside Girlguiding. Since 2009, we have covered a range of issues affecting girls from education, wellbeing, aspirations, social action, and safety on- and off-line.

2.2.   We also reference anecdotal experiences from our Advocates and British Youth Council Delegates - our youth panels consisting of young Girlguiding members aged 14 to 25. In 2019, they undertook an audit analysing the impact of advertising which we have also referenced in this submission.

3. Types and themes of ad content that give rise to body image concerns

3.1.   Our research with girls during the first covid-19 lockdown revealed that girls and young women have been spending more time on social media during lockdown, with 85% of girls aged 15 to 18 saying this. But with increased time online, they've faced increased pressures. For example, 26% said they felt pressured to lose weight or exercise. And our most recent survey following the latest lockdown showed that 25% of girls and young women aged 15 to 18 said they felt under more pressure to look a certain way.

3.2.   Girls and young women tell us that the narrow ways in which women are represented in the media, including on social media through influencers, negatively impacts their confidence, wellbeing and body image. For example, reinforcing unrealistic beauty ideals, the sexual objectification of girls and women, and normalising unequal social and professional roles of women and men. With children and young people's access to the internet increasing each year, it's important to understand the impact this can have on them and their wellbeing. In particular, our research shows the gendered pressures that girls and young women face.

3.3.   Our Girls' Attitudes Survey also shows that girls and young women believe the media reinforces the message that women and girls' value is correlated to their appearance and that it often relies on sexist and stereotypical images of women to reinforce the idea that women's bodies exist only to be looked at, to sell products and to entertain through sexualisation and objectification. And that they must look 'attractive' using stereotypical ideas of beauty. The gendered stereotypes used from a young age that value girls on their appearance over what they do, for example, being complimented for 'looking pretty' whereas boys may be complemented on for 'being strong' or 'brave'. Messages they get from the media also confirm this alongside an 'ideal body' type or image that they should aspire to. The media they consume churns out image after image of how women should look. Alongside products they are told they need to help them achieve this such as weight loss products and cosmetic procedures.

3.4.   Our Girls' Attitudes Survey shows that girls believe the media reinforces the message that women and girls' value is correlated to their appearance and that it often relies on sexist and stereotypical images of women that reinforce the idea that women's bodies exist only to be looked at, to sell products and to entertain through sexualisation and objectification. And that they must look 'attractive' using stereotypical ideas of beauty.
*   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)

- 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)

3.5.   Our research 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's 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.

3.6.   Not all girls and young women experience this pressure equally. Our research finds girls and young women with multiple protected characteristics may feel additional pressure: Our 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.

3.7.   When asked why these images make them feel insecure about themselves, girls and young women aged 11 to 21 told us it's because 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%).

'Social media is full of fakeness that puts people down and makes them want to be like others when you should be yourself.' - Young woman, 19-21, Girls' Attitudes Survey 2021

3.8. In 2019, our youth panels undertook an audit of advertising, analysing the types of the ads that were being broadcasted. It shows 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

4. Impact of advertising on self-perception of body image experienced by girls and young women

4.1. Girls and young women face a unique set of challenges to their mental health and wellbeing, and pressures around their appearance is one of them. Through our research, we have seen a decline in girls' and young women's happiness over the past decade and we know that poor body confidence can affect how girls feel about themselves and the world.

4.2. From a young age, girls say they don't feel happy with how they look and can feel embarrassed and ashamed of their appearance. Girls experience intense appearance pressures and tell us that fear that people will criticise their bodies holds them back from doing everyday things they'd like to do. Girls are made to feel that how they look is the most important thing about them – something young girls feel and this only increases as they get older. They believe their appearance matters when it comes to being successful in life and that there are double standards for girls compared with boys. Girls' lives are restricted by fear of judgement and how they are perceived by others.

4.3. Girls and young women tell us they face significant pressures around their appearance. These start from a young age and increase significantly as girls get older. Over time we can see 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%.

4.4. Even from a young age, there are expectations of what girls should look like and it affects their views of themselves. In 2016 they told us:
- 38% aged 7-10 and 77% aged 11-16 say they don't feel pretty enough
- 53% aged 7-10 and 72% aged 11-16 feel they need to be perfect
- 53% aged 11-21 say people make girls think how they look is the most important think about them

'Not being happy with how I look makes me feel sad and worried and like I might be bullied' - Girl, 7-10, Girls' Attitudes Survey

Girlguiding
WE DISCOVER, WE GROW

4.5. The immense pressures and scrutiny girls and young women face around how they look has a significant and detrimental effect on their health and wellbeing, and the opportunities they feel they have both now and in their futures. Not feeling positive about how they look prevents them from living freely. In 2016, almost half (47%) of girls aged 11 to 21 say the way they look holds them back most of the time.

'While social media has been a crucial way for girls and young women to connect over lockdown, a rise in online harassment and appearance pressures have left many feeling isolated. The overwhelming demand for greater legislation to be put in place to protect girls and young women online must be acted on' - Emily, Advocate, Girls' Attitudes Survey 2021

4.6. Body image is a serious issue for many girls and young women that can limit their lives and opportunities. From a young age, girls say they don't feel happy with how they look and can feel embarrassed and ashamed of their appearance. In 2016 our Girls' Attitudes Survey showed that 53% aged 7 to 10 and 72% aged 11 to 16 feel the need to be perfect. Almost half (47%) aged 11 to 21 said the way they look holds them back most of the time. 38% aged 7 to 10 and 77% aged 11 to 16 said they don't feel pretty enough. In addition, 40% of girls aged 7 to 10 said they feel like they should lose weight. Our 2018 survey with girls aged 11 to 21 showed:
   - 62% would like to lose weight
   - 50% have been on a diet
   - 33% sometimes skip meals to lose weight

4.7. The trend in girl's mental health and happiness in the UK has been in decline for the past decade. This is clear in our research, and in others. One of the main causes for girl's unhappiness is related to body image anxiety and appearance pressures. This is a particularly significant for girls in the UK and not seen across all comparable nations. Low body confidence limits young people's lives and opportunities. In our 2018 Girls' Attitudes Survey, 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. And our 2020 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.

'It got to the point where I didn't want to leave the house or meet anyone' - Girl, 11 to 16, Girls' Attitudes Survey

4.8. We believe body image is an equalities issue – as 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 represented back to them. And it holds people back from being themselves and taking part in public life fully.   We have collated quotes from our youth panels to help illustrate the diverse and intersectional experiences when it comes to the expectations and pressures they face around how they should look.

'The media's idea of a 'perfect' body has never considered the daily struggles girls and young women face surrounding disability, race, sex and sexuality. No one girl is the same. For many years, those who consider themselves to be 'different' have tried to alter their appearance to fit this mediated image of what their body should look like' - Phoebe, 20, Girlguiding Advocate

'My darker complexion and African features, full lips, broad nose and afro hair, are all clear indicators that I am on the far end of meeting the European set beauty standards of this country. I have been deemed unattractive, manly and ugly. Not only is there a lack of black people and women in the media but a lack of black women. Because of my treatment at school and what I saw around me, I hated myself and resorted to skin bleaching and straightening my hair to "rectify" the "problem".' – Jemmar, 20, Girlguiding British Youth Council Delegate

5. Impact of social media advertising, including influencer marketing, on body image concerns, in light of increased online media use

5.1.   As part of this, social media and influencers have also had an impact on girls and young women. Our research shows that influencers can promote unrealistic beauty ideals, and unattainable lifestyles which make girls and young women feel pressured to be 'perfect'. Our 2020 Girls' Attitudes Survey, 71% of girls aged 11 to 21 think the media and influencers on social media need to do more to stop reinforcing gender stereotypes. In addition to this our 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. And 22% have tried a diet after hearing about a celebrity using it.

'Influencers have had a positive impact for companies in terms of creating a quick and easy marketing strategy with a wide reach. However, I think they have overall had a negative impact on society by further installing this idea of a "perfect body" image into girls and young women from a young age, whilst also giving an impression that you aren't successful unless you have a nice house and nice car in your early 20s. This is not realistic at all!' – Phoebe, 20, Girlguiding Advocate

5.2.   The use of filters, airbrushing and editing images is normalised in influencer culture. Constantly seeing images and videos of influencers with 'flawless skin' or a 'perfect body' can make girls and young women want to change the way they look. Our 2019 Girls' Attitudes Survey 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. Sometimes this can be for fun, but our 2020 survey shows 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. And 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%).

'Every day I scroll through Instagram and see adverts of the same bodies and shapes from brands. However, the worst are ones that influencers post, as they enforce a stereotype of the same ideal body for a specific brand or product. Each advert may not be 'outrageous' enough to be banned, yet it can reinforce a negative view on your own body as you see the 'perfect' images constantly' –
Henrietta ,16, Girlguiding Advocate

5.3.   We believe that the arrangements between influencers and advertisers could be clearer, and that policymakers, tech companies, influencers and advertisers need to work together to make sure these arrangements are transparent. At present it's not always clear when an influencer is advertising or promoting a product or, when their images are digitally altered. We recommend that there's a consistent way in which influencers advertise online, and for these advertisements to be labelled more explicitly, as at present they're not always distinguishable from other posts online. We also support proposals to mandate labelling of all digitally altered images. We're pleased to see that the ASA are protecting children and young people by addressing complaints regarding the disclosure of influencers' ads.

6. Potential impact of advertising content for specific product sectors

6.1.   Certain product sectors are more likely to have an impact on girls' and young women's body image than others. Such sectors usually target their ads at women as a specific audience, and monetise on their insecurities. Examples of these industries beauty and makeup, weight-loss and diet, cosmetic procedures and clothing industries. In the advertising audit, our youth panel members pointed out many adverts aimed at women focused on 'reducing the effects of aging'. They didn't see this same pressure for men, creating a double standard and unnecessary pressure on women. We were glad to see ASA take action on cosmetic interventions advertised to under-18s in 2021 and hope this can extend to other appearance-based products in future.

6.2.   In our 2021 Girls' Attitudes Survey, 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.

'I think online ads are more invasive due to the nature of the relationship between young women and their phones. My social media is where I go for my role models, for inspiration and for empowerment so when it's infiltrated by damaging stereotypes or products such as weight loss pills, it leads me to doubt myself and feel bad about my body. As a generation we use our phones all the time so are more likely to be exposed to these harmful ads' – Grace,16, Girlguiding British Youth Council delegate

6.3.   Girls also feel there needs to be more realistic and diverse in the representation of women in adverts:

- 95% want the advertising industry to show more positive, diverse representation of girls and women
- 88% want adverts that have been airbrushed to say so
- 88% want adverts to stop using sexualised images of women
- 44% say there should be more diversity in the media (around ethnicity, disability and LGBTQ+)

7. Positive impact of advertising

7.1. As part of the audit of adverts that our youth panels conducted in 2019, they highlighted examples of ads they thought were positive. This was because they showed diverse images and content of women and girls that challenge ideal body types or normalised ideas of beauty; spoke openly about taboos girls often encounter such as around periods; and they welcomed ads that showed women challenging gender stereotypes such as their active role as a leader or in a sector dominated by men.

8. Our recommendations

8.1. We believe there are a number of ways to reduce the impact that advertising has on body image. These include:
- altered images are labelled clearly and consistently on social media posts and advertising
- weight-loss and appearance improving ads are not shown to under 18s
- greater restrictions on the promotion and sale of diet products to children and young people under 18
- influencers recognise the impact their posts can have on young people's wellbeing
- a consistent and clear way influencers advertise online In this submission, we
- social media companies and the ASA to work together to eliminate body-image related harms through the Online Safety Bill

9. Girlguiding activity

9.1. The Girlguiding programme gives girls and young women a space where they can be themselves, gain valuable skills, discover their full potential and have fun. As part of our programme of badges and activities girls can take part in the following activities:
- The Free Being Me peer education programme helps girls grow body confidence and challenges unhealthy beauty ideals. The programme encourages girls in Brownies and Guides to challenge social image myths and reframe the ways they think about their bodies so that they are able to articulate positive things about them and value them for more than just how they look.
- The Breaking Free peer education resource empowers young people to enjoy their hobbies, gain the skills they're interested in and help bring about a world where nobody feels trapped by gender stereotypes. Through this resource, girls can develop skills in assertiveness, cultural awareness and media literacy.

- The Feel Good Skills Builder allows girls to develop body confidence, self-esteem and resilience.
- The Media Critic interest badge for Guides allows them to develop media literacy and critical thinking skills through analysing different messages from the media

9.2. Girlguiding has been active throughout the pandemic: in March 2020 we launched Adventures at Home a range of activities online to help children, parents and carers find simple ways to create fun, adventure and boost wellbeing during the current crisis. Since then, Girlguiding has supported all our units to get back to guiding safely and securely. We are proud of our communities' resilience during this time and have been able to continue to support girls and young women as they return to education or work, supporting the catch up agenda with informal education that teaches them skills, confidence and tools for their wellbeing.

9.3. Future Girl is our five-year plan to help our girls and volunteers make the changes they want to see in the world. In 2018, over 76,000 girls and 16,000 leaders told us what topics they cared about. Through the Future Girl topics, our members of all ages will explore and act together on the things they really care about. Our topic Self Believers, focuses on improving girls' and young women's wellbeing.

9.4. Our Advocate panel gives girls a platform to use their voices and seek change at the highest levels. Advocates are a group of 18 Girlguiding members aged 14 to 25 who lead the direction of Girlguiding's advocacy and research. They act as media spokespeople for Girlguiding and speak at events. They are able to speak with decision makers including politicians about our evidence and what girls would like to see change. And Our British Youth Council (BYC) delegation comprises of 10 members aged between 14 and 25 from across the UK. Delegates learn how power and politics work and how they can use their voices and connect their views with other young people to create positive change.

10. About us

10.1. Girlguiding is the leading charity for girls and young women in the UK. Thanks to the dedication and support of our amazing volunteers, we are active in every part of the UK, giving girls and young women a space where they can be themselves, have fun, build brilliant friendships, gain valuable life skills and make a positive difference to their lives and their communities. We build girls' confidence and raise their aspirations. We give them the chance to discover their full potential and encourage them to be a powerful force for good. We give them a space to have fun. We run Rainbows (4-7 years), Brownies (7–10 years), Guides (10-14 years) and Rangers (14–18 years). Registered Charity No. 306016.

11. Contact details

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Hello

Please find below evidence for the body image call for evidence.

Some may relate to content on online platforms and also may not distinguish from user generated content and advertisement. However, we believe advertisement influences other content online with some users referring to products and services regarding body image without explicitly naming the post an 'ad' if they were not paid for it. Some evidence specifically relates to advertisement.

Independent Research and Reports

GirlGuiding's Survey and Research into appearance pressures young females experience through exposure to online adverts and images portraying perfection:
Girls fear criticism for being themselves | Girlguiding

House of Commons Women and Equalities Select Committee, 'The Body Image Crisis: How should the Government better protect people from body image issues and eating disorders', including through advertisement:
The Body Image Crisis (shorthandstories.com)

Be Real Campaign – 'Somebody like me' A report investigating the impact of body image anxiety on young people in the UK:
Somebody_like_me-v1.0.pdf (berealcampaign.co.uk)

Be Real was formed in response to this 'Reflections on Body Image' report from the All Party Parliamentary Group for Body Image:
http://ymca-central-assets.s3-eu-west-1.amazonaws.com/s3fs-public/APPG-Reflections-on-body-image.pdf

The Royal Society for Public Health, Report on social media and recommendations including '*to highlight when photos of people have been digitally manipulated*':
RSPH | #StatusofMind

5Rights research shows child accounts directly targeted with harmful content including eating disorders:
5Rights | New research shows child accounts directly targeted with graphic content within as little as 24 hours of creating an online social media account (5rightsfoundation.com)

Healthwatch Essex Research based on interviews with over 2,500 young people, includes pressures regarding body image:
YEAH! 3 – Healthwatch Essex

NHS medical director Professor Stephen Powis calls for ban on 'damaging and misleading' celebrity social media ads:
NHS England » Top doctor calls for ban on 'damaging and misleading' celebrity social media ads

UK Government Equalities Office Report on 'Negative body image: causes, consequences & intervention ideas':
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/952523/Negative_body_image-_causes__consequences___intervention_ideas.pdf

Scottish Government Body Image Report and Recommendations:
MHF_Body-Image2020_Report_ONLINE-VERSION (1).pdf (mentalhealth.org.uk)

House of Commons Women and Equalities Committee 'Changing the perfect picture: an inquiry into body image', Sixth Report of Session 2019–21:
Changing the perfect picture: an inquiry into body image - Committees - UK Parliament

2019 Mental Health Foundation Report on 'Body Image: How we think and feel about our bodies':
Body image: How we think and feel about our bodies | Mental Health Foundation

Men and body image

#Thisboytalks campaign to encourage young males to talk about body image, effect on mental wellbeing and causes including advertisements:
Boys' Biggest Conversation | (mediasmart.uk.com)

Instagram and Campaign Against Living Miserably (CALM) survey on male body image:
Let's talk about male body image - Campaign Against Living Miserably (thecalmzone.net)
CALM Body Talks - Campaign Against Living Miserably (thecalmzone.net)

Steroid abuse to improve body image:
Up to a million Britons use steroids for looks not sport | Health | The Guardian
Public Health Wales | Image is primary motivation for use of image and performance enhancing drugs

Media trawl re body image

- The House (27/11/2021) Legislation to combat the bombardment of unrealistic expectations of beauty, health and happiness through body image - Battling For Body Image (politicshome.com)
- The Recover Clinic (09/03/2019) Does the Advertising Industry Feed Off your body image insecurities? Does The Advertising Industry Feed Off Your Body Image Insecurities? - The Recover Clinic
- Open Democracy (21/04/2014) On beauty: Special K adverts, body dysmorphic disorder, and Lupita Nyong'o | openDemocracy
- Perfect Skin Solutions blog (08/12/2021)"Kim Booker told ITV how she was seduced by advertising promising she could take control of her appearance using cosmetic procedures." Dr Dev Patel on ITV News: Body dysmorphia sufferer's fillers addiction struggle as ad ban targets 'Love Island face' demand - Perfect Skin Solutions
- Digital Information World (20/12/2020) Snapchat's Head of Public Policy UK & The Nordics says that the move to ban celebrities from altering pictures on social media has 'merits' - https://www.digitalinformationworld.com/2020/12/snapchats-head-of-public-policy-uk.html#

- BBC News (02/09/2020) Girl Guides: Enhanced photos need labels on social media
  - https://www.bbc.co.uk/news/technology-54003536
- Poltics Home / The House Magazine (07/09/2020) We need honest advertising where body images have been digitally altered on social media
  - https://www.politicshome.com/thehouse/article/we-need-honest-advertising-where-body-proportions-have-been-digitally-altered-on-social-media
- BBC Radio 4 The Week Ahead in Parliament - https://www.bbc.co.uk/news/uk-politics-54118963
- Daily Mirror (05/09/2020) Melanie Blake: I back MP's plan to make celebs admit they've edited photos - https://www.mirror.co.uk/3am/celebrity-news/melanie-blake-back-mps-plan-22634541
- Glamour (04/09/2020) This is why people are backing a law for enhanced photos on social media to come with a label - https://www.glamourmagazine.co.uk/article/law-for-enhanced-photos-on-social-media-to-be-labelled
- Tech Times (07/09/2020) Charity urges influencers to label digitally-altered images on social media as half of young women use Instagram filters to create 'perfect image'
  - https://www.techtimes.com/articles/252333/20200907/charity-urges-influencers-to-label-digitally-altered-images-in-instagram-as-half-of-young-women-use-filters-to-show-their-perfect-image.htm
- The Sun (07/10/2020) Celebrities expose shocking reality of retouching apps fuelling mental health problems in youngsters - https://www.thesun.co.uk/fabulous/12873001/celebrities-expose-shocking-reality-retouching-apps/
- Mailonline (12/09/2020) 'Maybe it would stop me from editing as much!' Laura Anderson shares defiant makeup-free selfie as she discusses proposed airbrushing ban on BBC Breakfast - https://www.dailymail.co.uk/tvshowbiz/article-8725759/Laura-Anderson-shares-defiant-makeup-free-selfie-discusses-proposed-air-brushing-ban.html
- Irish Mirror (08/09/2020) Lauren Goodger edits photos to ease her anxiety and compares filters to make-up - https://www.irishmirror.ie/showbiz/celebrity-news/lauren-goodger-edits-photos-ease-22646821
- Happiful Magazine (01/10/2020) Image editing apps: The problem for our mental health
  - https://happiful.com/image-editing-apps-problem-mental-health/
- Buckinghamshire Free Press (02/10/2020) Amersham PT: How 'fake' Instagram photos impact women's confidence
  - https://www.bucksfreepress.co.uk/news/18765836.amersham-pt-fake-instagram-photos-impact-womens-confidence/
- Grazia (29/09/2020) 'I used to hate my face without filters. Do you?'
  - https://graziadaily.co.uk/life/real-life/instagram-filters-safe/
- Mailonline (13/09/2020) The toxic filters that warp reality…and make young girls hate their bodies: In a warning that will dismay parents, Emily Clarkson lambasts social media trickery that lets teens alter their photos in seconds - https://www.dailymail.co.uk/femail/article-8728775/In-warning-dismay-parents-Emily-Clarkson-lambasts-social-media-trickery.html
- Refinery 29 (31/10/2020) I feel increasingly weird about my face
  - https://www.refinery29.com/en-gb/instagram-face-filters-dysmorphia

Influencers/support groups/advocates speaking about body image:
Be Bold Be You, Gallery of photographs — Boudoir photoshoot Derby, East Midlands
Stephanie Lange - YouTube
Ms Great Britain contestant to compete make-up free - BBC News
Petition · Create a law to protect models from being pressured to lose weight! · Change.org

I hope the above evidence is acceptable. Please let me know if you need anything further.

We wish you a Merry Christmas.

Kind regards

Abigail Peirson
Administrative Officer for

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Mental Health Foundation response to Advertising Standards Authority consultation on Body Image, January 2022

1. Introduction

The Mental Health Foundation's vision is for a world with good mental health for all. Our mission is to help people understand, protect and sustain their mental health. Prevention is at the heart of what we do, because the best way to deal with a crisis is to prevent it from happening in the first place.

We welcome the ASA's call for evidence on body image and advertising. Negative body image is a serious and growing threat to mental health and advertising is one of the primary pressures on people's perception of their body image.

This is an issue we have been working on for some time. For Mental Health Awareness Week 2019, we focused on body image to raise awareness of the relationship between our mental health and how we think and feel about our bodies[1]. Polling we commissioned for the week found that just over one in five adults (21%) said that images used in advertising had caused them to worry about their body image. Additionally, 22% of adults and 40% of teenagers said images on social media caused them to worry about their body image.[2]

We also co-chaired an Advisory Group on body image for the Scottish Government which made a number of recommendations about advertising in its March 2020 report.[3]

For this consultation response, we have drawn on two new sources to provide further insights into people's experience of body image and advertising.

On the 15th of December 2021, we held a workshop with our Mental Health Foundation (MHF) Young Leaders, a group of 14–25-year-olds from diverse backgrounds and a range of different lived experiences, who are hosted by Leaders Unlocked. We used this session to draw on the young people's experience of body image and advertising, with a focus on the themes in advertising and the approaches they used that can positively or negatively affect body image.

We also sent out a survey to our MHF *Our Personal Experience Network* (OPEN) to generate further qualitative feedback on advertising and body image from a wider range of ages. The network comprises of ~3,000 adults around the UK who have agreed to be consulted on mental health-related issue to inform our work. It is not intended as a statistically representative sample of the UK population. The survey ran from the 16th to the 21st of December and received 117 responses.

Quotations from both sources are used throughout this evidence submission.

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[1] The Mental Health Awareness Week 2019 report on body image is available here: mentalhealth.org.uk/sites/default/files/DqVNbWRVvpAPQzw.pdf

[2] For Mental Health Awareness Week 2019, we commissioned YouGov surveys of 4,505 UK adults 18+ and 1,118 GB teenagers (aged 13-19). The figures have been weighted and are representative of their respective population groups.

[3] The final report of the Scottish Government's Body Image Advisory Group on Good Body Image is available here: mentalhealth.org.uk/sites/default/files/MHF_Body-Image2020_Report_ONLINE-VERSION%20%281%29.pdf.

2. Types and themes of ad content that give rise to body image concerns

Lack of diversity

The overwhelming message from both our Young Leaders and OPEN was that a lack of diversity in advertising can lead to body image concerns. Diversity in advertising can relate to age, gender, race, sexual orientation, disability status as well as body shape and size.

The MHF Young Leaders felt that seeing one type of body could lead to people experiencing a 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.

For many of the young leaders, the one body type they perceived to be presented in advertising was not something they could realistically achieve. These young people felt "excluded" and "othered" by what they saw, prompting feelings of shame and disgust in their own bodies.

One of the young people in our session asked in response to an advert that purportedly encouraged viewers to "love their body", *"How can you love your body if you don't look like that?"*.

Lack of diversity was a theme that came through strongly in the OPEN survey as well. Respondents commented:

- *"The majority of women you see in adverts are completely different from my body type - they are tall where I'm short, they are thin where I'm overweight. It makes me think my body is unattractive."*

- *"[Advertising] reinforces that there is a particular body type that is deemed acceptable and that deviation away from that is not."*

We also know that people with protected characteristics, who are routinely excluded from representation in advertising, are at greater risk of experiencing body image concerns. Heterosexual men have been found to report higher levels of body appreciation than gay and bisexual men[4], for example, and our Mental Health Awareness Week survey showed 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 our 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".

We recommend that the Codes of Practice should encourage advertisers to take every opportunity to promote, celebrate and normalise diversity through the advertising they use.

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[4] Blashill AJ, Tomassilli J, Biello K, O'Cleirigh C, Safren SA, Mayer KH. Body Dissatisfaction Among Sexual Minority Men: Psychological and Sexual Health Outcomes. Arch Sex Behav. 2016 Jul 8;45(5):1241–7.

"Perfect" or "flawless" features

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".

One respondent from OPEN said that:

- *"I have always had issues with body image and while I am more aware of that now and more confident in myself the portrayal of women's bodies in the media always seems to make me feel less than perfect."*

The young people in our discussion group complained that the perfection achieved in advertising seemed effortless and natural, in stark contrast to the effort they felt they had to put in to achieve an appearance they were happy with. This makes falling short of perfection feel like failure, and the effort required feel like evidence of a deficit.

There is also a problematic dynamic in marketing certain types of product; advertising acts to create a gap between an idealised, aspirational body image and what people are realistically able to achieve. It is this gap between the desire for the ideal and the lived reality that drives demand for products. This 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.

The pursuit of flawlessness is already showing some troubling effects, particularly among young people. Our polling for Mental Health Awareness Week 2019 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.

Idealised images

Advertising presents an idealised version of the world according to Western norms and uses perfect-looking people to achieve that aesthetic. However, for several of our Young Leaders, the association between perfect physical features and idealised, happy situations implies that not meeting standards of physical beauty means that they should not or cannot be happy:

- *"If I gain weight, will I be unhappy?"*

This dynamic is made worse by advertising that shows people feeling happy after a transformation, for example after cosmetic surgery or following weight-loss.

Importantly, it was clear from those we consulted that the use of idealised bodies to create an aspirational advert meant that they could experience body image pressure from advertising that is not directly related to physical appearance. Any advertising using perfect bodies to evoke a feeling of a happy or perfect life can contribute to negative body image.

Placement of adverts

The placement and timing of advertising can exploit people's insecurities about their body image and make a potentially harmful advert more dangerous. This was central to our complaint about MYA Cosmetic Surgery adverts in 2018 for breast implants, which were

scheduled during Love Island[5]. The placement of this advert, as well as the way it presented breast implants as aspirational, was dangerous to people's body image because Love Island attracts a young audience and is itself responsible for glorifying a narrow beauty ideal.

Our session with the Young Leaders also revealed concern about the strategy of placing of multivitamin adverts on the London Underground, where people are regularly going to be feeling less than their best – which feature models with flawless teeth and skin.

Adverts for dieting and weight-loss products can be a significant source of body image pressure and can be especially dangerous because of their relationship with eating. The ASA should ensure that weight-loss adverts are not promoted to under-18s.

Types of adverts

In our 2019 YouGov poll, 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.

3. Impact of advertising on self-perception of body image experienced by different audience groups

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.

The young people in our discussion group 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.

Both the Young Leaders and OPEN raised the issue of disability and illness. The Young Leaders reported that they felt inspired by positive images of disability in advertising, even when they were not disabled themselves. However, advertising that presents disability and illness in a positive light is still in the minority. Respondents from our OPEN survey said that:

- *"Over the past two years I have lost both my breasts due to cancer. I am mostly fairly comfortable with my new, flat self, but find it hard to watch the kind of adverts that show women dressed to accentuate their cleavage, as if breasts are the be-all and end-all of women, or women's attractiveness."*

- *"I have got a disability, so I don't relate to able-bodied stuff on the internet."*

- *"Perfectly lined and brushed eyebrows. It's a small thing but since chemotherapy and having shitty, half-regrown, pale eyebrows it's something I really notice."*

Age was also an area which could be poorly represented in advertising. The Young Leaders group felt that advertising regularly showed older adults in care, in hospices, or in funeral settings and rarely in more positive environments. One respondent to the OPEN survey said that *"adverts of cover pictures of 'older' people/ pensioners are almost always famous*

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[5] https://www.asa.org.uk/rulings/mya-cosmetic-surgery-ltd-a18-459775.html

people, in full make up & [with] professionally coiffured hair. I am almost 70, can't wear makeup and can't afford to go to the hairdresser. I think these aren't even vaguely accurate."

However, for some, being older can be a protective factor against having negative body image. Reports of negative body image experiences diminish as people advance in age, after a peak in early adulthood – and it is likely that this carries over to experiences of advertising. There were several responses to our OPEN survey where respondents connected their age to fewer worries about body image.

A person's gender can also influence their experience of body image relating to advertising. While women bear the brunt of negative body image experiences due to the depiction of women in advertising, men can also be at risk:

- *"As a male presenting person, I don't fit at all the representation of masculinity I see in the media, which contributes to my feeling of disconnection to my assumed gender".*

The Scottish Government's Advisory Group on Body Image also heard from NHS staff working in specialist steroid clinics who reported that many male patients attribute the desire to change their body through steroids to images and discussions they see in the media.

4. Impact of social media advertising, including influencer marketing, on body image concerns, in light of increased online media use

Over the course of the pandemic, social media use has increased. People spending more time online means that they are seeing a greater quantity of online advertising, including from social media influencers. We used our session with the MHF Young Leaders and the OPEN survey to try to find out whether online advertising had a greater impact on people's perception of their body image than traditional marketing, whether this impact was negative, and to identify the qualitative differences that make this the case.

Overall, we encountered a mixed picture. For those that engage with social media, there is potential for it to have a greater impact on their body image than traditional media, but the negative and positive implications vary depending on the way that people engage with social media.

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.

From OPEN:

- *"This got worse when I was online, but Facebook would show me lots of adverts related to dieting, probably targeted as a result of my age, gender and Googling habits, and this made the problem even worse."*

We separately encountered this theme in our engagement with young people as part of the Scottish Government's advisory group on body image, specifically in relation to people with an eating disorder. They discussed how the algorithm showed adverts/content they had been looking at when unwell and, on return to their social media, they found this triggering and damaging to their recovery.

Additionally, the young people in our discussion group said that social media-influencer marketing can blur the lines between advertising content and organic content. This means that people are less likely to approach influencer advertising with the same guarded mindset that they might bring to traditional advertising, making them more vulnerable to subtle, degrading messages about their bodies.

From OPEN:

- *"Social media is more relatable to an individual using a product and is less obvious marketing that you know has taken hours to put together. Even if influencers spend time and money on content it's mixed with average people who don't, blurring the lines of what's marketing and what's a genuine recommendation."*

On the positive side of social media and influencer marketing, some users felt more able to control their content and only follow people that they find relatable or inspiring:

- *"Because they're real people, who speak for my community, they understand the issues non-binary people face and so I'm not excluded."*

- *"I follow real genuine people that share real results, so it has a positive impact."*

The ability to control social media advertising is, however, only available to those who are tech-savvy enough to do so and willing to put the time in.

Despite the negative potential of targeted nature of social media advertising described above, it does have a potential upside: one young person in the Young Leaders session felt more included by the types of people they saw in social media advertising because the content was marketed to them, rather than the average audience of a television time slot, for example.

Comments from both the Young Leaders discussion and the OPEN survey suggest that the perceived greater impact of social influencer marketing is due to the perceived greater "relatability" of the influencers. Influencers can often live out their whole lives online, albeit a curated version of their life. For the young people we spoke to, this meant that their content "means a lot more than seeing it on television".

The relatability of social media influencers can help people to take comfort in their situation and appearance:

- *"They are people I connect with through lifestyle, attitude. They help me see myself as valid in the world"* (OPEN participant)

- *"There are many 'plus-sized' influencers on Instagram who are great at showing real bodies. There are also now more people who show their bodies in a natural state, which allows people to feel more 'normal'"* (Young Leader)

However, there is also suspicion about their power, influence, and integrity:

- "*Much of what is advertised has been filtered/enhanced/doctored, either digitally or in real life, and it's often impossible to tell, meaning I'm left feeling inadequate and trying to attain standards that are actually impossible to achieve."* (OPEN participant)

- *"[Social media influencers] don't know the impact they have on other people."* (Young Leader)

- *"I have seen some influencers that are more human, real people reflecting real life, body shape, home, life. They show clothing, make up, beauty care at its best and worst. More honest than tv advertising. However, there are also some influencers that are totally fake."* (OPEN participant)

5. Positive impact of advertising

From our session with the Young Leaders, the most powerful way that advertising can be positive is by inspiring feelings of validation and inclusion. The young people in the session spoke powerfully about the value of seeing diversity in advertising: "*when I see a diverse range of people, I feel more like myself.*"

While respondents to the OPEN network were less forthcoming about the positive impact of advertising – 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 – there were some comments that supported the observations made by the Young Leaders:

- *"Body positivity should be promoted, advertising with ultra slim models is not what most of the population look like. Advertising such as Boohoo who have a range of bodies so people can identify."*

- *"I've noticed since I've started seeing more advertisements with diverse people it's helped my own body image."*

6. Conclusion and recommendations

Our research demonstrates that advertising places significant pressure on body image, and that this body image impact can be harmful to viewers' mental health.

While the CAP and BCAP both have codes of practice that can be applied to body image (BCAP 1.2 and CAP 1.3 specifically), the scale of body image harm from advertising shows that there is a need to do more in the way that these codes have been interpreted.

The ASA's guidance, *Social responsibility: Body image*, focuses primarily on "unhealthy body image" in the physical health sense – i.e. presentation of body images that appear underweight. The underlying logic seems to be that unhealthy body image is related to striving to achieve a body that is itself unhealthy. We contend, however, that unhealthy body image is much broader: it is any dissatisfaction with a person's appearance that causes distress.

We recommend that the *Social responsibility: body image* guidance is updated to reflect a broader definition of unhealthy body image. The updated guidance should seek to interpret the existing BCAP 1.2 and CAP 1.3 codes to prevent adverts from presenting any extreme, unusually flawless, or "perfect" body as aspirational or as a prerequisite for happiness. The ASA 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 powers or influence to promote more diversity in advertising.

The ASA should also consider an addition to the CAP and BCAP codes to recognise body image as a harm that must be avoided, in a similar way to the 2018 addition on gender stereotypes.

Contact information

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Meta response: CAP and BCAP call for evidence on body image

Introduction

We view the safety of the people who use our apps as our most important responsibility and we have developed robust policies, tools and resources to help keep people safe. Facebook's Community Standards and Instagram's Community Guidelines are designed to foster an authentic place for inspiration and expression, while encouraging our community to respect each other and their diversity of perspectives, beliefs and cultures. We publish quarterly reports to show how we're enforcing our policies and to hold ourselves publicly accountable to our progress. We also have stricter policies for advertising, for branded content and for what should be recommended to people on our apps.

We know from our work with expert organisations that some people can feel a pressure to look or live a certain way because of social comparison to others. This social comparison is something that happens both on and offline, but we don't want our apps to be a competition; we want them to be a safe and supportive place where people can come to express themselves and have a voice. We therefore think it's important to take proactive steps to address the pressure to look a certain way, and the impact negative body image can have on potentially vulnerable groups; but also provide a platform for experts to share important body positivity messaging and for our community to share their experiences.

Self-image and body positivity

Our expert partners tell us 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 we live in, and an individual's closer personal environment such as peers and their family. We therefore think it's important we take proactive steps when it comes to the pressure to look a certain way which some people may feel online.

When it comes to body image we find that many people have gravitated towards Facebook and Instagram as places to share their own journeys with self-image and body positivity, and our apps can inspire healthy conversation between community members, allowing them to support each other through shared experiences. Social media can also 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.

As a result we're constantly thinking about ways to bring more awareness to the body positivity movement on Facebook and Instagram, which is why we have partnered with a wide range of body positive creators and organisations. For example, the @Instagram account has nearly half a billion followers and is the most followed account in the world, and we've used it - with their permission - to profile those driving cultural change on these issues including Stephanie Yeboah, Nikki Lilly and Megan Crabbe as part of anti-bullying week in the UK to promote and support body positive conversations. Instagram previously worked with I_Weigh to develop a six part interview series, hosted by Jameela Jamil, which explores identity and life positivity with every episode featuring body positivity conversations.

Creators, brands and NGOs often use social media to drive cultural and societal change on the issue of body image and social comparison, sometimes through advertising or branded content. For example, to support those with visible differences on social media we've had a number of meetings over the years with Changing Faces and these conversations led us to

provide a number of rounds of advertising credits for their campaigns promoting positivity and preventing hate towards those with visible difference, as well as a direct briefing with our content policy team to share their experiences. It's important, therefore, that any CAP/BCAP rules take account of the fact that many pieces of both organic and advertising content may discuss body image or feature different body types, but in a way which seeks to drive positive cultural change.

Advertising and Branded Content at Meta

Everyone who uses our services is subject to our Community Standards/Guidelines; and we place additional requirements on advertisers who are also required to follow our Advertising Policies. Among these policies are several measures specifically designed to address issues around negative body image in ads, particularly among young people. For example, ads must not contain "before-and-after" images of weight gain or weight loss. They also cannot include images or claims that contain unexpected or unlikely results. And 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. This means that 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. In addition, 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.

Ads for weight loss products and cosmetic procedures have long been against our policies for under 18s. Branded content - which we define as a creator or publisher's content that features or is influenced by a business partner for an exchange of value, such as monetary payment or free gifts - must be age-gated to 18 years or above where it is promoting cosmetic surgery, cosmetic procedures, weight loss products, or weight loss services. Last summer we also announced that we only allow advertisers to target ads to people under 18 (or older in certain countries) based on their age, gender and location. This means that previously available targeting options, like those based on interests or on their activity on other apps and websites, will no longer be available to advertisers. These changes are global and apply to Instagram, Facebook and Messenger. When young people turn 18, we'll notify them about targeting options that advertisers can now use to reach them and the tools we provide to them to control their ad experience. Last year we also announced that targeting options related to topics people may perceive as sensitive will no longer be available for advertisers, beginning in January 2022. This includes targeting options referencing causes, organizations, or public figures that relate to health.

Before ads go live on Facebook or Instagram, they are subject to Facebook's ad review system, which relies primarily on automated review tools to detect keywords, images, and a host of other signals that may indicate a violation of one of the Advertising Policies. If this process detects a violation of these policies, it will reject the ad. We use human reviewers to improve and train our automated systems, and in some cases, review specific ads. No such system is - nor ever can be - perfect, so we also rely on reports from our community and regulators to help us identify possible policy-violating ads. Beyond reviewing individual ads, we may also review and investigate advertiser behaviour, like the number of previous ad rejections and the severity of the type of violation, including attempts to circumvent our ad review process. Advertisers who violate our policies may have actions taken against them, including losing the ability to run ads on Facebook and Instagram. Branded content is organic content that features or is influenced by a business partner for an exchange of value, such as monetary payment or free gifts. These posts are subject to our Community Guidelines and our Branded Content Policies. Where individuals post content that violates

our policies, they may have their account demonetised so that they can no longer use monetisation features or our Branded Content tool.

When it comes to broader enforcement, we recognise the importance of the ASA enforcing its own rules, and drawing attention to key rulings in order to encourage others to comply. The ASA recently ran a targeted ad on Facebook to raise awareness of its recent rulings on the prohibition against advertising Botox. The ad was seen by c. 1.4m people and viewed over 4.5m times (on average the ad was seen 3.37 times per-person). Over 2.5k people clicked the link, directing them to the ASA website to read the accompanying Enforcement Notice. As part of the project the ASA used its new monitoring technology to discover problem ads, and in turn report the ads to us to investigate and action their removal.

Tools and partnership work

When it comes to body image and social comparison we know that everyone is different, so we are always working on ways to give people the power to control what they see and what others see about them on Facebook and Instagram. For example this year we gave people the option to hide like counts on all their posts in their Instagram feed, and an option to hide like counts on their own posts, so others can't see how many likes your posts get. We launched this after testing hiding like counts to see if it might depressurise people's experience on Instagram, and finding that not seeing like counts was beneficial for some, but not everyone.

On the advertising side, early this year we're launching a tool so that people can opt to see fewer ads for e.g. weight loss products on Facebook and Instagram. We've also been working on tools so that people can manage their experience on Instagram, including topics like social comparison and body image. In December we launched 'Take A Break' in the UK. If someone has been scrolling for a certain amount of time, we'll ask them to take a break from Instagram and suggest that they set reminders to take more breaks in the future. We'll also show them expert-backed tips to help them reflect and reset. To make sure that teens are aware of this feature, we'll show them notifications suggesting they turn these reminders on. This is in addition to the Time Spent tools we already have, which allow people to set limits of how much time they spend on Instagram each day, and see how much time they're spending in the app each week. In addition our research shows - and external experts agree - 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. We announced that we'll start nudging teens towards different topics if they've been dwelling on one topic for a while.

Body image, eating disorders and wellbeing are complex issues, so we look for expertise and guidance of safety experts, academic researchers, NGOs, human rights activists, and policymakers. Our policy process involves regularly getting input from outside experts and organisations, such as our expert advisory group, made up of mental health organisations and academics from more than 20 countries. For example we sought guidance from external experts, including Dr Ysabel Gerrard in the UK, when we moved to restrict and remove posts about certain weight loss products and cosmetic procedures across Instagram and Facebook in 2019. And on serious topics such as eating disorders, experts tell us that intervening early with the right resources, at the right time, can be helpful. That's why earlier this year we introduced new resources specific to eating disorders so that if someone searches for common terms related to eating disorders or body image, we'll share this material first *before* showing the search results, and in the UK we will direct people to Beat. We'll also direct people to these resources when we become aware they've shared eating disorder content, or if a friend is concerned about something they see posted and wants to offer support.

Given the broader, societal nature of body image, and the way different content affects people in different ways, education remains vital in this space. In the UK, Meta is a contributor to the Media Smart media literacy programme for 7 - 16 year olds, which provides free educational resources for teachers, parents and young people - including a dedicated body image programme for boys and girls. Recent and upcoming work focuses on creator marketing resources, and also on body image by tackling the use of airbrushing by content creators. As part of our work supporting The Diana Award's anti-bullying programme we supported the creation of a free additional module for schools on the Pressure for Perfection, reaching hundreds of schools and thousands of young people. We have also worked with Internet Matters and Childnet in the UK to launch the 'Pressure to be Perfect' toolkit. The toolkit is about recognising that what you see posted by others is just one part of their life - that a single post or video rarely reflects all that is happening behind the scenes.

NUFFIELD COUNCIL ON BIOETHICS

Body image in advertising: call for evidence

Committee of Advertising Practice and the Broadcast Committee of Advertising Practice

December 2021

Summary

1. The Nuffield Council on Bioethics' response to CAP's and BCAP's call for evidence draws on the recommendations and conclusions of our 2017 report Cosmetic procedures: ethical issues. We also highlight evidence that has emerged during the last few years which may be relevant to the Committees' consideration of body image in advertising.

Conclusions and recommendations from the Nuffield Council's report

Adopting Transport for London's approach

2. Our report highlights the excellent example set by Transport for London (TfL), which – since July 2016 – has enforced a policy that states: *"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".* **Our report encourages the ASA to follow TfL's approach in its own guidance. We continue to urge the Committees to do so**.

The importance of a proactive approach

3. Should the Committees decide to introduce new standards on body image for advertisers, we would like to highlight a further recommendation in our report: that **there should be a proactive approach** to monitor compliance with such standards. We are pleased that CAP has stated: *"we don't just wait to receive complaints – we proactively monitor ads across different sectors and media to make sure standards are being maintained."* This proactive approach will, we suggest, be particularly important to support the introduction of any new guidance on body image advertisements, given that it would be a new area of oversight for the Committees. Understanding TfL's processes to manage advertisements which might have a negative impact on body image could be instructive for the Committees in this respect.

Evidence gathered as part of our project

4. As part of our project, we carried out an online public survey to gather people's views on the questions we sought to address. In a [summary] of this survey, to which 448 people responded to some or all of our questions, we highlight that nearly 73% of respondents indicated that people's attitudes to cosmetic procedures were influenced by advertising. While not representative of the entire UK population, our findings offer an insight into public opinion.

Additional evidence on body image in advertising

5. In addition to the Council's own recommendations and evidence, we would also like to draw the Committees' attention to other developments relevant to the question of advertising and body image. Alongside the key studies and surveys outlined in the Committees' call for evidence document, we would like to highlight additional UK-based research:

    - [Surveys 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.

    - [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%).

    - A June 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."*

6. Evidence from outside the UK may also be instructive for the Committees in their consideration of advertising which might promote negative body image:

    - A survey from [YouGov America] published in May 2021 indicates that 76% of US adults think that the media promotes an unattainable body image for women.

    - [A US study] from March 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."*

    - A [study] from April 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."*

- A [Swiss study](#) from 2016 suggested that exposure to advertising for cosmetic surgery resulted in women's increased dissatisfaction with both bodyweight and appearance.

Conclusion

- We look forward to CAP's and BCAP's analysis of this call for evidence, and its forthcoming outline of related actions. If we can be of further support in the Committees' consideration of body image, we would be delighted to assist.

Contact

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Dr Christine Campbell is an Associate Professor in Psychology at St Mary's University. Dr Nicola Brown, Dr Cleo Jaye, Dr Anne Majumdar, Dr Atefeh Omrani and Ms Joanne O'Prey are at the same institution. Dr Craig Owen is a Senior Lecturer at Anglia Ruskin University. We are a cross disciplinary group of UK academics working in Health, Nutrition and Psychology. We are submitting evidence from a series of studies which analysed the ways different media (magazines, billboards and social media) represent bodies. *Note that these are not audience reception studies – these studies examine the advertising messages themselves, rather than the effect they have.*

What body messages are being conveyed by media?

- "Idealised" body stereotypes are pervasive.
- Some media do better than others at challenging the idea of an "ideal"
- Physical ideals are often linked to ideas of gender (e.g. not being man enough)
- Tactics seen in the social media marketing of weight loss products (i.e. The Flat Tummy Co) are particularly concerning as they hold up an ideal body on one hand, and tell women to binge eat and drink with the other.
- Body diversity in models (e.g. in billboard campaigns by Boo Hoo and Pretty Little Things) is to be welcomed but they may simply replace one ideal with another (thinness is replaced by curviness).

Background

1. We are a cross-disciplinary group of academics who have published research on the ways that bodies are portrayed in media. We've looked at the way breasts are discussed in teenaged girls' magazines; the way that penises are represented in men's magazines; the way that The Flat Tummy Co. market their appetite suppressant products using Instagram; and the use of more racially and body diverse models in billboard campaigns by companies such as BooHoo and Pretty Little Things. In our research, outlined below, we identify how media perpetuates patriarchal ideas of female beauty and sexuality, primarily by reinforcing the concept of "ideal bodies" which must be aspired to. We also comment on how the male body, masculinity and specifically the penis, are put on display for critical inspection like never before.

Research on the representation of gendered and sexualised bodies[1]

2. Women are repeatedly told that their physical attractiveness is one of their most important assets.

3. We compared the way that the two teen girl's magazines with the highest circulation, Seventeen and Teen Vogue, wrote about breasts. We 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":

> *"If your breasts appear to be equally full at both the top and bottom, then you've got round boobs. People with these assets don't tend to need particularly structured, padded bras, as you don't need the bra to help shape the breasts – nature's done that for you."*

4. In contrast, the other magazine we looked at, Teen Vogue took a very different approach. They 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":

> *"Women's bodies are constantly being critiqued. Whether it's unwelcome comments from others, or sometimes even criticism of ourselves, it seems like someone always has something to say. Worse, women are also constantly made to feel like they should look a certain way...The bottom line is that all bodies are beautiful, "trends" or not."*

5. Teen Vogue articles were characterised by a deconstruction of media messages as well as an awareness of the role the magazine itself plays. This acknowledgement of responsibility was incredibly refreshing to see, and we are of the opinion that their approach is one that could and should be used as an example of best practice.

Penises[2]

6. In another study, we looked at the way men's magazines talk about penises, examining four popular UK titles: Men's Health, GQ, Attitude and Loaded. Even though the magazines are aimed at different demographics, the messages across all four were remarkably similar. Men's magazines are an influential site where masculinity is reproduced and commodified. They act as cultural signposts for men, telling them how they should feel about their penises and their masculinity.

7. Men are assumed to be very fearful about issues to do with their penis, and we often saw laddish humour being deployed to soften talk about injuries or damage that could occur. Where once size was the only salient factor, the articles were also laced with messages about ideal size and aesthetics with articles entitled things like "Is your penis good looking?"

8. Men's magazines present aspirational goals and expose men to traumatising imaginings of what could go wrong. Ultimately, they leave readers wrestling with a fear of not being 'man enough'.

Stomachs[3]

9. Of all the media representation studies that we have conducted, the most disturbing was probably our analysis of The Flat Tummy Co Instagram campaign. The Flat Tummy Co sell appetite suppressant products to women through targeted Instagram advertising. They have been criticised by various high-profile public figures, for example Jameela

Jamil, but ours is the first academic analysis of their marketing tactics. We concluded that the company employs a three-stage process to sell their product. Step one is to reinforce the message that women should aspire to a thin ideal. Step two is to tell women that they are too weak or lazy to attain it. Step three is the 'logical conclusion' that the only way to attain the ideal is to buy their products. For example, Flat Tummy Co's Instagram feed is full of pictures of exercise equipment, side by side 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."*

10. We find these marketing tactics particularly concerning because they not only reinforce harmful stereotypical ideals, but they go one step further by undermining women's agency, telling them that they are weak and lazy, and explicitly instructing women to shun exercise and a healthy diet and instead to binge on junk food and alcohol.

Bottoms[4]

11. The final piece of work we'd like to bring to the committee's attention is our latest project, looking at billboard images that were used in campaigns by the clothing companies BooHoo and Pretty Little Things in 2019. These images were notable in that the models were racially diverse and larger than is usually seen in advertising campaigns. In particular, the 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. We asked young women how they viewed these images and what sense they made of the messages they conveyed. While we rather naively thought they might welcome diversity, in fact they mostly reported feeling that this was yet another oppressive portrayal of bodily ideals, if anything an even more unattainable one as it combined large bottoms with slim waists.

> *"So it's like you have to have bigger breasts and a bigger bottom, it's not like you can be bigger anywhere else."*

Our participants also felt that this was a shallow version of diversity:

> *"Like, picking and choosing the black features that you want."*

Summary

12. Our research has highlighted areas of poor (and good) practice in the media and the need for editors, journalists and companies to reflect on the approaches they adopt when discussing male and female bodies.

13. We are particularly concerned about the way weight loss products on Instagram are advertised. Consumers are being encouraged to binge eat and drink and avoid exercise, and then turn to weight loss products, such as laxatives, for a solution, despite their being no evidence for their efficacy.

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We would be happy to provide further evidence and information if useful. Please feel free to contact Dr Christine Campbell christine.campbell@stmarys.ac.uk

Yours sincerely,

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References
1. Brown, N., Campbell, C., Owen, C. & Omrani, A. (2020). How do girls' magazines talk about breasts? *Feminism and Psychology, 30*(2), 206-222.2.
2. Owen, C. & Campbell, C. (2018). How do men's magazines talk about penises? *Journal of Health Psychology*, *23*(2), 332-344.
3. Owen, C., Campbell, C., Majumdar, A., O'Prey, J., & Jaye, C. (In preparation). A focus group study exploring how women make sense of billboard images of non-conventional female models.
4. Campbell, C., Owen, C., & O'Prey, J. (2021). Erasure of Labour: A critical analysis of appetite suppressant product marketing by Flat Tummy Co. *Feminist Media Studies.*

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Consultation on body image in advertising

Response from Transform Hospital Group

This document sets out Transform Hospital Group's (THG) response to the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice's (BCAP) call for evidence on body image in advertising.[1]

Summary

As an independent healthcare provider and the UK's leading provider of cosmetic interventions (both surgical and non-surgical) and weight management services, THG welcomes CAP and BCAP's timely inquiry into connections between advertising and body image-related concerns.

Given that two of THG's core service offerings – cosmetic interventions and weight management services – are directly referenced in the consultation document and are often considered to be connected to body image, this response focuses on these areas.

Building on our advocacy activity in relation to body image – which the Advertising Standards Authority (ASA) is aware of – and the insights that we share in this consultation response, THG particularly recommends that CAP, BCAP and the ASA introduce the following measures in relation to body image:

- Media reports and stakeholder opinion suggests that there may be a link between the use of digital alteration software by advertisers online and negative body image perceptions. THG recommends that CAP, BCAP and the ASA conduct a specific review of digital image alteration software on the human form and its impact on individuals' body image. Such a review should account for the nuances surrounding this area, including an acknowledgement that image alteration software is used to some extent by the vast majority of advertisers in a manner that will not have a direct impact on individuals' perceptions of their own body image (i.e. clothing, backdrop, lighting). However, where image alteration software has been used to directly alter the shape of a human body, there may be scope for further guidance or regulation, as appropriate. Such steps must be taken in consultation with industry and must be evidence based. As the UK's leading provider of cosmetic interventions and weight loss services, THG would be pleased to participate in a review of this important area.

- Issues relating to body image and advertising content are fluid and subject to a rapidly evolving cultural environment. THG recommends that the ASA creates a permanent 'Body Image Working Group', bringing together advertisers, advertising service providers, experts in academia, online service providers, think tanks and third sector organisations to review the suitability of existing guidelines governing advertising and marketing activities relevant to body image, particularly online, on a consistent basis.

About Transform Hospital Group: who we are and the values that define us

Transform Hospital Group is an independent healthcare provider and the UK's leading provider of cosmetic interventions – both surgical and non-surgical – and weight-loss services. The company

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[1] Body Image in Advertising: Call for Evidence, Committee of Advertising Practice and Broadcast Committee of Advertising Practice

operates two state-of-the-art hospitals – Burcot Hall in Birmingham and The Pines in Manchester – in addition to a nationwide network of clinics that cover most major towns and cities across the UK.

An absolute commitment to patient safety, clinical excellence and corporate responsibility underpins everything we do and is core to our identity as a healthcare services provider. Indeed, we have been proud to support the NHS during the COVID-19 pandemic and continue to deliver essential care to NHS patients at this critical time.

THG functions with a clear-minded awareness of the responsibilities of providers of cosmetic interventions and weight management services at a time when questions and debates surrounding body image, mental health, gender and identity are high on the public agenda. As a market leader in these sectors, we recognise our responsibility to adopt an extremely thoughtful, considered and nuanced approach to the way in which we engage patients – through our marketing activity, our patient interaction, the surgeon and nurse-led consultation processes and in the delivery of aftercare. We recognise and embrace the imperative to remain forensically aware of the external dynamics that may condition the motivations of patients, and thus adopt a holistic and compassionate approach to patient safety and wellbeing throughout the patient journey.

It is this commitment that has driven us to seek to proactively and responsibly enhance the regulatory environments in which we operate. We have engaged in a number of stakeholder engagement campaigns, which have notably recently included calling for an overhaul of the regulation governing non-surgical cosmetic interventions. This involved proactively supporting MPs as they considered the Botulinum Toxin and Cosmetic Fillers (Children) Act 2021, which was passed into law earlier this year.[2] Though this is a positive initial step, THG has since called for further regulatory improvements for the non-surgical cosmetic interventions sector specifically, including measures that would grant local authorities the ability to regulate providers of non-surgical cosmetic interventions.[3]

At THG, we are aware that the marketing of cosmetic interventions and weight management services is exposed to a rapidly evolving, fluid and often unpredictable cultural environment, notably as a result of the way that people use, share and engage with content on social media platforms. We are firm in our belief that advertising for these services is appropriate for adult audiences, and indeed provides supportive information for individuals considering an intervention. Adults must have the freedom to make informed decisions about their own bodies, and – with the right checks and balances in place to ensure informed consent – the cosmetic interventions and weight management sectors offer space for them to do so.

Nevertheless, we do recognise that some individuals suffering from mental illness such as body dysmorphic disorder may be drawn to cosmetic interventions and weight management services, and we have adapted our patient journey to account for the potential that individuals unsuitable for such interventions on healthcare grounds can be identified and offered appropriate support. We have therefore developed a bespoke approach to screen for mental health conditions at a patients' first point of contact with our clinicians. THG's clinicians are trained to identify signs of mental health conditions, and where identified, patients are offered support and signposted to relevant mental health services, such that they can be directed to appropriate care.

Further, we recognise that understanding of mental health conditions and their intersection with cosmetic interventions and weight management services is rapidly evolving. As such, THG is

[2] Botulinum Toxin and Cosmetic Fillers (Children) Act 2021, UK Parliament
[3] Why councils should have the power to improve safety of cosmetic treatments, Tony Veverka, LocalGov

proactively working with third party organisations to ensure that our screening procedures and the advice we offer to patients is clinically informed, robust and adaptable.

We are pleased to share our six guiding safeguarding principles, which are core to the delivery of care across our clinics and hospitals:

1. Empowerment
    a. THG supports and encourages individuals to make their own decisions and achieve informed consent.
2. Prevention
    a. Staff are trained to recognise symptoms of abuse and respond to such concerns.
    b. THG proactively identifies and supports patients that may be vulnerable.
    c. Where a patient is suspected to be suffering from a mental health condition, THG's clinicians are trained signpost that individual to appropriate mental health support services.
3. Proportionality
    a. Safeguarding concerns are responded to proportionally by taking the least intrusive response appropriate to the risk presented.
    b. THG ensures that there are effective ways of assessing and managing risk.
4. Protection
    a. Where appropriate, staff work with partner agencies to support those reporting or being abused until such a time that a satisfactory outcome is achieved.
    b. THG ensures that any suspected criminality is reported quickly to the police.
5. Partnership
    a. THG proactively engages with third party organisations to develop effective internal protocols and build safeguarding networks.
6. Accountability
    a. THG's Senior Management Board and Group Head of Governance and Compliance ensure that the organisation has clear and robust safeguarding policies, procedures and information sharing protocols.
    b. All reports of abuse, neglect and suspected mental health conditions are confidential and, where appropriate, only shared with organisations that can support the issue, observing data protection laws.
    c. THG's safeguarding approach is regularly audited, evaluated and reported to the Senior Management Board.

Beyond our direct interaction with patients, we have also instigated a range of protocols relevant to our marketing activities, which we outline further in this document.

This commitment to patient safety, and the values that underpin our perspectives on what we do and why we do it, defines THG, our culture and our people.

Age-restricted advertising in the cosmetic interventions sector

In recognition of the rapidly evolving, fluid and often unpredictable advertising environment in which we operate, THG has adopted an engaged and proactive approach to addressing body-image related concerns relevant to our services, both on- and offline.

In August 2021, THG recommended that regulators introduce a range of measures to restrict under-18s' exposure to cosmetic interventions marketing across all advertising channels.[4] We also independently committed to a series of industry-leading internal protocols to further restrict the extent to which under-18s can view or interact with our cosmetic interventions marketing content. These measures were introduced to ensure that our own marketing activities are aligned with the patient-centric, clinical best practice imperatives that guide the delivery of our clinical services.

It is in this context that we welcomed CAP and BCAP's announcement in November 2021 that new restrictions will be introduced to prohibit cosmetic interventions advertising from being directed at under-18s on all forms of media, which saw the achievement of the core goal of our campaign.[5] Our press release on this subject, which includes THG's internal protocols introduced in August 2021, is included in Annex 1 of this document.

Indeed, we are firm in our belief that any marketing activity specific to the cosmetic interventions sector is only suitable for, and should be solely viewed by, adults and must be developed sensitively and appropriately. We therefore take extremely seriously our responsibility to ensure that our own marketing activities are focused on intended audiences and do not target under-18s, directly or indirectly.

We therefore strongly support the ASA, CAP and BCAP's activities in this area and we will seek to remain an active and engaged participant in ongoing discussions regarding the regulation of advertising relevant to body image.

Recommendations

THG's regulatory recommendations with regards to the connection between advertising and body image, specific to the cosmetic interventions sector, were set out in our August 2021 press release (Annex 1). We are pleased that CAP, BCAP and the ASA's recent announcement of further measures to regulate the advertising of cosmetic interventions incorporates many of our recommendations.

We have given further consideration to body image-related issues since our initial intervention, and we now also recommend that CAP, BCAP and the ASA conduct a specific review of digital image alteration software on the human form and its impact on individuals' body image. Such a review should account for the nuances surrounding this area, including an acknowledgement that image alteration software is used to some extent by the vast majority of advertisers in a manner that will not have a direct impact on individuals' perceptions of their own body image (i.e. clothing, backdrop and lighting).

However, where image alteration software has been used to directly alter the shape of a human body, there may be scope for further guidance or regulation, as appropriate. Such steps must be taken in consultation with industry and must be evidence based. As the UK's leading provider of cosmetic interventions and weight loss services, THG would be pleased to participate in a review of this important area.

Given the extent to which young people in particular engage with content online, it is important that consumers have an accurate and authentic representation of the human form, or are able to discern if/when alteration software has been used in instances where it has made a significant change to a human body/body part. Regulatory action in this regard could include a requirement on advertisers

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[4] [Tighter rules needed to restrict under-18s exposure to cosmetic interventions ads](#), Transform Hospital Group
[5] [Strict new rules for ads for cosmetic interventions](#), Committee of Advertising Practice and Broadcast Committee of Advertising Practice

to display a 'disclaimer' where digital alteration software has been used to alter a human body part to a significant degree.

However, it is important to recognise that the use of image alteration software can take place in many forms and there are a number of nuances around this subject that must be accounted for. For example, many advertisers make use of stock imagery in their marketing materials; in these cases, it is very challenging to discern whether an image has already been digitally altered before it is then used by the advertiser.

Further, it would be important for any such regulation to distinguish between digital alteration that has made a material difference to the shape of a human body or body part, and where software has been used to a minor degree, to erase logos or creasing from clothing, for example. It is important to note that digital alteration software is used across the vast majority of advertising content to some degree, but minor changes to images should be considered in a different light to alteration that makes significant changes to a human body or body part, which may result in adverse body image perceptions amongst the audience that views or engages with that image.

For example, at THG, we do not use contouring techniques that might give consumers an unrealistic expectation of the outcome of a cosmetic or weight loss intervention. However, like the majority of advertisers, we do utilise digital alteration software to a minor degree to remove logos or creasing on clothing, for example.

Therefore, in the interest of informing consumers, we would in principle support the introduction of some form of regulation such as the addition of disclaimers to advertisements which have made use of digital alteration software such that a human body or body part has been significantly changed, on the assumption that this regulation has been the result of direct engagement with advertisers and those making uncontentious use of digital alteration software as a normal course of marketing activity.

THG also recommends that the ASA creates a 'Body Image Working Group', bringing together advertisers, advertising service providers, relevant experts in academia, online service providers and third sector organisations to review the need for updates to guidelines on an ongoing basis. The formation of such a group would be a recognition of the rapidly evolving environment which gives rise to body image-related concerns. It is essential that all stakeholders that are engaged in the creation of advertising content – directly or indirectly – maintain consistent dialogue to help inform regulation and policymaking, in the interests of consumers.

Concluding remarks

We thank the CAP, BCAP and the ASA for their ongoing work to shape the advertising environment in the interest of consumer safety. It is clear that body image-related issues that may result from advertising content cannot be addressed overnight; the regulatory response must be holistic and informed by all relevant stakeholders. Moreover, the regulatory environment must be easily adaptable and able to respond to the fluid nature of the advertising environment, particularly online. THG would be pleased to further support the work of the CAP, BCAP and the ASA however we can, providing expertise from the healthcare, wellbeing, cosmetic interventions and weight management sectors in particular to serve the best interests of consumers and patients.

Annex 1

Tighter rules needed to restrict under-18s exposure to cosmetic interventions advertising
Transform Hospital Group press release, 4th August 2021

Transform Hospital Group has today called for new regulations for advertisers of cosmetic interventions, aimed at strengthening rules that would restrict under-18s from viewing or engaging with cosmetic interventions marketing content, on- and offline.

In an industry first, Transform Hospital Group, the independent healthcare organisation and the UK's leading provider of surgical and non-surgical cosmetic interventions, is urging regulators to introduce a number of measures to restrict under-18s' exposure to cosmetic interventions marketing content across all advertising channels.

The company has also independently committed to a series of industry-leading steps to further restrict the extent to which under-18s may view or interact with its cosmetic interventions marketing and advertising content.

Transform Hospital Group has called for new rules that include:

- A ban on partnerships between advertisers of cosmetic interventions and social media influencers under the age of 25 - or with influencers whose content is likely to appeal to under-18s.

- Regulation and guidelines that require cosmetic interventions advertisers to demonstrate that due diligence has been undertaken to restrict, to the greatest extent possible, under-18s from viewing content associated with social media influencer partnerships.

- A requirement on cosmetic interventions advertisers to display a disclaimer on their social media profiles stating that the content on their channel is only suitable for over-18s.

- A ban on pre-watershed (9pm) broadcast advertising of surgical and non-surgical cosmetic interventions.

The company believes that the introduction of these measures would mark a significant step towards ensuring that the marketing of cosmetic interventions, which is designed exclusively for an adult audience, does not inadvertently reach or influence under-18s.

Christine Mozzamdar, Clinical Services Director at Transform Hospital Group, said:

"We are firm in our belief that any marketing activities specific to the cosmetic interventions we deliver are only suitable for, and should be solely viewed by, adults and must be developed sensitively and appropriately. We therefore take extremely seriously our responsibility to ensure our own marketing activities are focused on our intended audience and do not target under-18s, directly or indirectly.

"We are, however, aware that the marketing of cosmetic interventions is exposed to a rapidly evolving, fluid and often unpredictable cultural environment, notably as a result of the way people use, share and engage with content on social media platforms.

"We are also keenly aware that under-18s are often particularly exposed to this environment, which may inform perceptions of their own body image, sometimes with negative consequences for their mental health and self-esteem. We believe that all organisations or individuals providing, or advertising, cosmetic interventions have a duty to reflect on the complex issues that may surround

these procedures and respond accordingly, taking all possible steps to ensure under-18s are not exposed to marketing content.

"As a healthcare organisation, and one of the UK's leading providers of cosmetic interventions, we recognise our responsibility to lead the way on this issue.

"That's why we are calling for new regulations and guidelines that tighten the existing rules governing cosmetic interventions marketing, with a particular focus on strengthening checks and balances relevant to under-18 audiences, which we believe will bolster the Advertising Standards Authority's ongoing work in this area. At the same time, we have put in place additional internal policies and procedures which we will be happy to share with others across the industry.

"Given the way in which many children and teenagers engage with online content, it is clear that social media platforms themselves also have a central role to play in finding a solution to this challenge. It is vital that platforms therefore continue work to develop mechanisms that help advertisers to more effectively police who views or engages with their content – directly or via third parties, such as social media influencers."

Transform Hospital Group has launched a range of marketing policies and protocols internally, focused on restricting the extent to which under-18s may view or engage with its marketing content. These include:

- An under-18s entry barrier has been added to the website of Transform Hospital Group's cosmetic interventions brand, Transform: transforminglives.com.

- The company will not work with models and social media influencers under the age of 25, or whose content may appeal to an audience under the age of 18 particularly.

- A disclaimer will be attached to all social media channels operated by the company, stating that content is appropriate only for audiences over-18. Disclaimers to this effect will also be attached to any content published by a social media influencer in connection with a marketing partnership with the company.

- In addition to conducting no pre-watershed TV advertising activity, the company will not conduct cosmetic interventions marketing activity in or around programmes that are likely to appeal to audiences under the age of 18.