

Your name	3. Do you consider the draft guidance to be clear and practicable? If not, please include suggestions for how it could be improved to achieve the aims set out in this consultation.	Please include suggested improvements.
PI17	No	<p>Gender stereotyping should also tackle age. For example, women over 70 are only seen on TV adverts involved with life assurance or funeral costs. Do women of this age group have only have death to look forward to. Why are they not seen in adverts for dairy products, toothpaste, bread, family holidays without the 'grandparent' stereotype, beauty products, buying a new car? Also, women under 25 are featured in sanitary products and women over 50 are featured in incontinence products. a) where is the 25-50 age group. We're still having periods. b) I know plenty of women who had children at 20 who suffer from weak bladder after having children. This is not a true representation of the age groups. Finally, why is car insurance, home insurance and energy products either advertised by men or cute creatures. Where are the women for these adverts? It is not only damaging to children to only see women under 25 being happy, healthy, beautiful, thin in TV adverts but on the population as a whole. Advertising primarily shows 2.4 families in heterosexually relationships under the age 25. The children in these adverts are an older girl and younger boy. It's absolutely everywhere. With exception to the HSBC advert that was refreshingly inclusive of homosexual couples and older generations.</p>
PI18	No	<p>More examples of what is considered to be in breach of the code should be included, so that advertisers and members of the public are more aware of what is/is not acceptable. At the moment, it is very abstract.</p>
PI19	Yes	.
SW	Yes	.

BTHA	Yes	Please see comments on separate evidence document.
PI21	No	blue for boy pink for girl is not a problem but delabeling what most find ok is a problem
PI22	Yes	The guidance seems clear, although present as a set of guiding principles that lead to the examples, rather than the over way around - the examples will change over time, but the guiding principles should be more durable.
PI24	Yes	I agreed
PI26	Yes	It should be considered that children are far more subtly and strongly affected by advertising messages and the guidance should therefore specifically and far more strongly address advertising targeted at children.
PI27	No	It needs to be set out clearer and understood that it is not making boys wear dresses nor making girls play with cars. It's giving all children the same opportunities in life by not steering them in narrow directions thus narrowing their life choices.

PI28	No	The guidance should be made stronger in relation to children to tackle all the implicit messages that we know kids see and learn from.
PI31	No	More examples
PI32	Yes	None
PI33	Yes	n
MCL	No	Needs to be more specific about gendered language and use of colour to portray gender based interest
PI35	No	Stronger guidance for ads targeting children - need to tackle the combined effect of many ads presenting gender stereotypes, rather than just individual cases. For example, encouraging more groups of girls and boys playing together, or boys and girls playing outside gender stereotypes would be better. Children are very susceptible, and advertisers need to be socially responsible in how they target this age group.

PI37	Yes	It's clear
PI38	Yes	As above.
PI39	No	Stronger recommendation with regard to advertising for children based on the known insidious effects of gender stereotyping at an early age.
PI40	Yes	No suggestions
PI41	Yes	Na
PI42	Yes	Yes, but some more examples that aren't quite so leading. Citing girls cleaning makes it sound ok. I'd like to see more balanced examples and also suggestions on where there are groups of children etc.

PI44	Yes	ok
PI45	No	I think it needs to be clearer with regards to children. Currently there is too much marketing aimed specifically at boys OR girls, when all toys or clothes are for any child. Girls are as capable as boys and boys are as sensitive as girls. For example blue is not just for boys and pink is not the only colour a girl wants to buy. Children have been brainwashed into thinking they can only like 'their' gender's things.
PI46	Yes	This is clear, much needed guidance for the advertising industry

PI47	Yes	No suggested improvements.
PI48	No	<p>Please can the guidance in relation to children be made stronger to tackle the fact that implicit exclusion is the main problem, is harmful, and is easily tackled. My daughter loves playing with toy trucks, cars and trains but it is so rare to see related adverts ever showing girls in them. (Unless the truck is pink, which then means no boy can ever touch it, least they may be mistaken for a girl!) The same with toy kitchens - most children love playing "home" but it is rare to see boys depicted in this environment. There are some positive examples but overwhelming barrage of adverts (including YouTube paid for adverts by individuals) are gendered and thru their power direct children to what is "appropriate".</p>
PI50	Yes	None
PI20	No	<p>I think it is clear, but won't be in the slightest effective to achieve stated aims. Sadly it's not the instances of overt gender bias (eg, saying openly that a toy is for girls or for boys) but the overall cumulative reinforcement of images which visually show that. To meet the aims of removing gender bias, ads needs to show girls and boys, men and women doing activities with the same frequency and emphasis. That's what the guidelines need to push towards. II</p>

PI55	No	Require that advertisers use all colours, not having a primary focus colour that is pink or blue. Ensure that both genders are shown using whatever they are advertising. The BBC documentary No More Boys and Girls made it clear that restricting childrens choices through gender stereotyping restricts their aspirations and their self confidence. Some guidance about demonstrating positive attributes such as boys being caring and not aggressive and girls being strong and not passive would be very valuable. Thank you for holding this consultation!
PI57	No	Make it stronger in its message.
PI58	Yes	None
NEU	Yes	Please see attached document below.
PI59	Yes	
PI60	No	.

BE	No	Please see report attached for reservations regarding changes. Hard copy sent to Ella Smillie.
SLL	Yes	Included in attached file.
PI63	No	More concrete guidance about not showing sequences of ads which just show boys or girls, I think there should be boys and girls in all adverts aimed at them. Why not?

LTBT	No	<p>In our research into toy ads in 2015 we found that boys and girls were largely shown playing separately, with different kinds of toys, very different colour and sound palettes, clothing, language and levels of activity. (Please see report for detail.) Similarly, our research into toy catalogues in 2016 and 2017 showed that the images of children portrayed children’s play in an overwhelmingly stereotyped way. (Please see report for detail.) However, little or none of this implicit stereotyping would be tackled by the guidance as currently proposed. We’d like the guiding principles to be reworded to acknowledge that implicit exclusion is also important and harmful, and should be avoided. Suggested text as follows, our addition in quotes. “Ads can be targeted at and feature a specific gender but should take care not to explicitly convey ‘or strongly imply’ that a particular children’s product, pursuit, activity, including choice of play or career, is inappropriate for one or another gender. To the first supporting example, we’d like to suggest adding: ...but care should be taken to avoid implicitly excluding boys or girls by only using such colours, language etc, or by including only girls or boys in a group of more than 3 or 4 children, without good reason. This would give grounds for complaint against a catalogue which included many pages of baby dolls without featuring a single image of a boy, for example, and would encourage the good practice of assuming that any larger group should be mixed. This reflects the changes in practice that we’re already starting to see. Eg all the Nerf ads we saw in 2015 featured only boys (or only girls playing with pink ‘Rebelle’ products), but this ad, dated 2018, features a mixed group: https://youtu.be/cxnLFh5_6Ik We’d like to see more ads like this, which show boys and girls playing together as they do in real life: https://youtu.be/usyrMhfZJI0 (Chad Valley soft toys) The second supporting example looks at directly contrasting boys and girls. We would like to see stronger wording here. To take a specific example, shared in our facebook discussion by supporter Micha Luna – this (French) ad shows how implicit stereotyping can be very strong even within a single ad, with the ‘imagination of children’ limited to a stark contrast between the boy (wearing shorts and t shirt) actively playing pirates outdoors and the girl passively playing princess, wearing a pretty dress in her pink bedroom: https://youtu.be/cH-DwN2yk3Q We suggest removing the words in square brackets and replacing with those in quote marks. An ad that seeks to emphasise the contrast between a boy’s stereotypical personality (e.g. daring) with a girl’s stereotypical personality (e.g. caring) ‘is likely to be problematic’ [needs to be handled with care]. [Explicit labelling of children that contrasts] ‘Contrasting’ stereotypical characteristics in a way that reinforces perceptions of what children can or cannot be, because of their gender, is more likely to be problematic. These changes would give grounds for complaint against the tired trope of directly contrasting boys and girls’ behaviour eg where boys’ mastery of toy weapons, tricks or remote control vehicles is contrasted with a girl needing to be rescued/being ‘grossed out’, or putting her appearance before action , or a boy is</p>
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ZT	Yes	The draft guidance is mostly clear and practicable however the previously mentioned references to only 'some' or 'certain kinds' of gender stereotyping as being harmful could be confusing to users and undermine the strength of the messaging contained within the guidance.
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PI65	Yes	n/a
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		<p>We would like to see better contextualising of how gender stereotypes reinforce and reproduce gender inequality which is a 'harm'. Ads aimed at one gender One of the three caveats around the guidance is 'you can still feature ads which are aimed at one gender where the product is developed and aimed at one gender'. This could use some clarification as many products that are essentially genderless are aimed at one gender. The Campaign Let Toys be Toys (http://lettoysbetoys.org.uk/) has worked solidly on this issue for many years. In their 2015 research Who gets to play? What do toy ads on UK TV tell children about boys' and girls' play? December 2015 (http://lettoysbetoys.org.uk/wp-content/uploads/2015/12/LetToysBeToys-Advertising-Report-Dec15.pdf) looking at advertising they found that:</p> <ul style="list-style-type: none"> •Boys were shown as active and aggressive, and the language used in adverts targeted at them emphasises control, power and conflict. Not one advert for baby or fashion dolls included a boy. •Girls were generally shown as passive, unless they were dancing. The language used in the ads focuses on fantasy, beauty and relationships. Out of 25 ads for toy vehicles, only one included a girl. •Ads targeted at boys were mainly for toys such as vehicles, action figures, construction sets and toy weapons, while those targeted at girls were predominantly for dolls, glamour and grooming, with an overwhelming emphasis on appearance, performing, nurturing and relationships. These toys are not inherently gendered, they are just toys. Such gendered advertising harms children by limiting them to stereotypical gendered behaviour and punishing those who do not conform to these rigid ideas. More specific examples in the guidance could include that larger groups of children in toy advertisements should feature boys and girls (mixed groups) and that ads should not explicitly or strongly imply that a particular children's product, pursuit, activity, including choice of play or career, is inappropriate for one or another gender. Intersecting Stereotypes On page 4 of the guidance you state that: 'The use of other stereotypes can compound the effect of gender stereotypes and increase the likelihood of harm and/or offence being caused by the depiction of gender stereotypes. Stereotypes associated with gender can include gender reassignment and sexual orientation; other stereotypes can include those relating to age, disability, race, religion, beliefs, marriage, civil partnership, pregnancy or maternity.' However, the guidance does not explicitly explore this in any of the examples, this approach should be woven throughout the guidance. Stereotypes such as those based on age, disability, race etc as well as sexuality interlock with gender stereotypes meaning that gender stereotypes themselves are not fixed. The guidance needs recognition of how, for example, stereotypes of older women differ from those associated with girls, and black and minoritised ethnic women are stereotyped in a different way to white women. An example of stereotypes interacting, could be as in an image of some packaging we found for a baby sling. The product had 2 types of packaging one which featured a solo black woman wearing a baby in a sling and another (for the same product) showing an
EVAW+	No	
GG	Yes	See attached document
IPA	No	See attached document
RC	Yes	