

1. Do you agree with CAP and BCAP's proposal to introduce a new rule and supporting guidance into the Advertising Codes? Please include relevant evidence to support your view, whether you agree or disagree with the proposals. *

- Yes
 No

Please include evidence for your proposals.

Girlguiding is the leading charity for girls and young women in the UK, with over 500,000 members. Consequently, our response focuses particularly on the experiences and challenges faced by girls and young women. Our submission focuses on evidence from our annual Girls' Attitudes Survey - the largest UK survey of girls and young women - which gathers the views and opinions of over 1,600 girls and young women aged 7 to 21, from inside and outside guiding.

Our response to the proposal and points raised in the consultation document

1.1 We support the proposal to introduce a new rule and supporting guidance into the Advertising Codes. We agree that gender stereotypes should be considered in terms of their potential for real world harm and welcome the proposed broadened focus to regulate gender stereotyping around roles, characteristics and conforming to gender stereotypes, in a clear and easily enforceable way. We also agree that gender stereotypes across all the areas included in the document can restrict people's choices, aspirations and opportunities as well as their interactions with others and how they view their own potential.

1.2 We're grateful to the ASA for including reference to the Be Real body image campaign that we have contributed to and our Girls' Attitudes Survey evidence on how girls' and young women's self-esteem is damaged by stereotypical media images and how advertising can affect their education, aspirations and careers. We also appreciate the inclusion of other points we raised in our consultation response, including:

- The need to tackle the common and unacceptable emphasis within advertising on women's appearances to the exclusion of their skills and abilities
- The potential for sexualised images of under 18s to contribute to the sexual objectification of girls and women in society. We were delighted that the ASA banned the sexualised depiction of under 18s in advertising following that consultation. As we'll cover within this response, girls have told us they want to see the sexual objectification of women of all ages addressed.

1.3 We agree that children can be particularly vulnerable to stereotypes but that they can affect people across society (who may then reinforce and reproduce these stereotypes with their children or children they work/come into contact with). We are pleased that advertising online falls under CAP's remit as this is where many young people spend a lot of time and are exposed to advertising.

1.4 We agree that it's important for advertisers and consumers to better understand what is acceptable and unacceptable in terms of gender stereotyping and found the examples included very helpful for illustrating this. For example,

that it would be acceptable to show a woman being 'sensitive' or a man being 'strong' but not if it was implied that these were characteristics specific to these genders or that there was no other way to be within these genders. Similarly, that an advert showing a woman doing housework would not be banned, but one showing a woman cleaning up after the rest of the family with no-one else helping (and the husband likely portrayed as bumbling and incompetent in regards to household and caring tasks) likely would be. Having specific examples relating to children and vulnerable groups (including young people and new mothers) was also helpful and we agree that advertisers should have a responsibility to consider the impact of their adverts on consumers' wellbeing.

It was also helpful to have broad categories that it would not apply to - i.e.:

- Successful, healthy or glamorous people (where this was not depicted in a way that pressurises people or makes them feel like a particular body shape leads to success for their gender)
- One gender for products for that gender
- Gender stereotypes used to challenge the negative effects of gender stereotyping

We think it's really important to have these practical examples so that the guidance is clear, implemented and followed properly.

1.5 We strongly agree that the ASA should particularly consider the viewpoints of those represented in adverts (i.e. individuals watching adverts seeing their gender, ethnicity, disability etc. represented in adverts) over what is considered the 'general accepted standard' of what is offensive and acceptable. It's important that individuals' views are considered over any such standard within society in that, as it's so brilliantly put by one of the contributors to the 'Depictions' report (p53), the society we live in remains 'institutionally and intrinsically sexist'.

We are pleased that CAP and BCAP feel that unacceptable depictions are unlikely to be mitigated by the use of humour and banter as these have been used as ways to justify and perpetuate harmful stereotypes.

1.6 We believe it's useful to highlight the finding that more advertisers are realising the commercial benefits of more accurately reflecting their consumer base (as opposed to using outdated and inaccurate stereotypes). However, it's important to note that stereotypes *may* sometimes accurately reflect consumers' views or choices, due to the way the stereotypes they have been exposed to up until now are normalised within society. We therefore appreciate the consultation's acknowledgement that the stereotypes reinforced (and sometimes even created) by the advertising industry can have harmful real world consequences - e.g. showing gender stereotypes of girls and boys playing with different kinds of toys is likely to lead to affect real children's toy choices and, as a consequence, potentially their feelings about themselves, their abilities and future career choices. Consequently, we're pleased to see CAP and BCAP assert that advertisers must take responsibility for not perpetuating harmful stereotypes.

We also appreciate the nuance within the guidance that ensures that roles and characteristics associated with genders can be included so long as it's not implied

that they're unique to that gender, that there's no other way to be within that gender or that no-one from another gender could perform them. We would never want to restrict girls' and young women's choices and obviously don't call for them not to like or ever see representations of aspects traditionally associated with girls - only for them not to be restricted solely to these.

Our evidence

Gender stereotypes in advertising

2.1 Our 2017 Girls' Attitudes Survey showed that girls become increasingly aware of gendered marketing and advertising as a problem. When choosing clothes and toys, girls of all ages know when they are being targeted by manufacturers and advertisers because of their gender, through the use of blatant stereotypes such as a reliance on pink or use of words like 'pretty'. This can make them feel uncomfortable and annoyed as it suggests there are limits to what they are supposed to like or do.

Our 2017 evidence shows that:

- 47% of girls aged 11 to 21 had seen stereotypical images of women and men in the media in the previous week that made them feel less confident to do what they want
- 42% had seen adverts portraying women or girls that they think are sexist

2.2 Our research shows that girls commonly see stereotypes in advertising and various forms of media. Of girls aged 11 to 21, 89% said they had seen gender stereotypes in TV, film, magazines or newspapers (25% sometimes and 64% often). We also asked girls what factors make people think stereotypes are true and they said:

- Images of women and men in the media (64% aged 11 to 16 and 83% aged 17 to 21)
- Toys/clothes made 'for girls' or 'for boys' (66% aged 11 to 16, 83% aged 17 to 21)
- Gendered language e.g. 'mankind', 'policeman', 'man-made' (53% aged 11 to 16, 58% aged 17 to 21)

Media sexism and lack of positive role models

2.3 Girls report that they are surrounded by negative, limiting and stereotypical portrayals of girls and women. Our research shows that the vast majority of girls recognise how widespread a problem this is and the impact it has.

In 2014 we asked young women aged 17 to 21 what they would like to see media organisations do to improve the representation of women.

- 89% think they should publicly commit to making sure they represent all women fairly.
- 84% think they should commit to showing more positive female role models.
- 77% agree that they should agree not to show airbrushed images of women.

Our 2014 Survey also found that:

- 65% agree that too often women appear in the media only because they are the girlfriend or wife of a famous man.
- 55% feel that there are not enough positive female role models in the media.
- 49% of girls aged 13 to 21 say that this portrayal of women restricts what they do or aspire to in some way.

Younger girls, those aged 7 to 10, held similar views about how women are portrayed. The evidence shows that girls are affected by negative stereotypes from an early age, and have an awareness that the women represented in advertising, and the media more generally, show only a partial picture of the roles girls and women can play in the world.

- 43% said that the women usually shown in magazines and on TV are all too much alike.
- 31% thought many women on TV are there only because of their male partners.

2.4 The majority of girls and young women clearly think that gender inequality - including stereotyped and sexist representations of girls and women in the media and public life - negatively affects how women are treated in society. It also affects their education, aspirations, careers, body image and confidence and their relationships.

'Every day we are exposed to thousands of images and ideas from the media. That's why I think their sexualised and stereotypical representation of girls and women is one of the major reasons for the high levels of sexism still present across society. Constantly seeing airbrushed and sexualised images of women has an extremely negative effect on girls' body confidence, and it affects how men and boys think too. Giving girls a voice on how this can be tackled is really important. Things have to change.'
(Morgan, 17, Folkestone, former Girlguiding Advocate)

'The media should include a diversity of images that portray women, for example in politics, business, academia, engineering, science, technology, mathematics and leading professions. These images must also be taken seriously, not ridiculed or mocked for not conforming to the sexualised stereotype of women.' (Sarah, 21, Morecambe, Girlguiding member)

Appearance pressures

2.5 Our 2015 Survey showed that among girls aged 7 to 10, 16% think they are more likely to be successful if they look like celebrities, and 14% sometimes feel embarrassed about the way they look because they are not like the girls and women on TV.

- 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.
- 33% think they are more likely to be successful if they look like celebrities, rising to 43% among those aged 17 to 21.

- 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.

2.6 Appearance pressures can have a harmful impact on girls. 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.

'If I could change one thing...I would change the way the media makes women feel - [as if] there is only one "standard" of beauty. This isn't fair!' (Girls' Attitudes Survey participant)

Sexualised portrayals

2.7 We're pleased that new guidance will help to ensure advertisers and consumers are clearer on what is acceptable and unacceptable in terms of sexualised content.

Our 2016 Girls' Attitudes Survey revealed that:

- 61% of 13 to 21 year olds feel that when women are portrayed as 'sex objects' it makes girls feel disempowered
- 70% of 11 to 16 year olds and 80% of 17 to 21 year olds feel that women are too often shown as sex objects in the media and online

2.8 Our 2015 Survey found that half of girls aged 11 to 21 (48%) think women are not portrayed fairly in the media. This is a substantial increase compared to 5 years before when 27% of girls thought women were not portrayed fairly. We also asked them about the impact of media and found that:

- 42% had read something in the media that trivialised violence or abuse towards women.
- 55% had seen the media talk about women's appearance before their achievements/job.
- 53% had heard a remark that belittled/degraded a girl/woman in a film or on TV.
- 75% of girls and young women aged 11 to 21 say that there are too many images of naked or nearly naked women in the media.
- Half of girls (48%) aged 7 to 10 think there are too many women on TV who don't have enough clothes on.

'We need ...changes in advertising and the media to stop sexualising women...' (Girls' Attitudes Survey participant)

'If I could change one thing...I would reduce objectification of women's bodies in the media.' (Girls' Attitudes Survey participant)

'The media influences society hugely, so if the media presents women as being sex objects, there only to satisfy men and be judged on their appearance, ordinary people start to believe that as well'. (Sarah, 18, Birmingham, Girlguiding member)

Girls' awareness of gender stereotypes in adverts

2.9 Our 2017 Survey shows that girls of all ages are aware of gender stereotypes in advertising:

- 68% of girls aged 7 to 10 and 70% aged 11 to 21 could identify products they thought were being targeted at girls or boys
- 51% aged 11 to 21 said these adverts are harmful to women being treated fairly and having equal opportunities to men and 33% aged 7 to 10 said these stereotypes showed girls are treated less fairly compared to boys
- 35% aged 11 to 21 said these adverts limit girls' future opportunities
- 46% aged 11 to 21 said they make girls seem less important than boys

Impact of adverts

2.10 Girls told us how adverts using gender stereotypes made them feel.

Girls aged 7-10:

'Disappointed and underestimated - plus I don't like pink!'

'As if the companies are sexist because of what they think girls/boys like. For instance I'm a girl but I like navy blue. It doesn't mean I'm a boy.'

Aged 11-16:

'Confused and annoyed - women can be just as strong and powerful as men.'

'It makes me feel angry because it is clearly implying that girls are less important and capable than boys.'

Aged 17-21

'Annoyed because it shows that women are only liked for their appearance.'

'Like I have to conform and be as perfect as the model but at the same time I know that it's all Photoshopped.'

2.11 On the other hand, 71% aged 11 to 21 said adverts that challenge gender stereotypes are helpful to women being treated fairly and having equal opportunities to men and 54% aged 7 to 10 said these adverts are helpful in showing girls being treated fairly compared to boys. Girls told us these adverts make them feel.

Girls aged 7 to 10:

'Like girls can be as fun as boys.'

'Brave and strong.'

'Proud to be a girl'

Aged 11 to 16:

*'It's very inspiring and I want to see a lot more of things like this
'Confident and free to do what I love.'
'Empowered because it shows girls breaking the stereotype that we should
be weak and fragile.'*

Aged 17 to 21:

*'Like women can be strong.'
'Happy for the future.'
'Hopeful that girls can be seen as equal.'*

Girlguiding's Work to Address Gender Inequality

Girlguiding's programme, research and advocacy promotes gender equality and our vision is of a world free from gender inequality where girls and young women are empowered and free to fulfil their potential.

Research and campaigns

2.12 Girlguiding supports girls to have their voices heard and speak out on issues they care about, including gender stereotypes, sexism and gender inequality. Our young members have made clear some of the specific things they want to see change on, such as compulsory Relationships and Sex Education (RSE) to address the unacceptable gendered pressures girls face. Their efforts have led to major legislative and policy changes, including the decision to make RSE statutory and guidance for education settings (co-written by Girlguiding) to tackle sexual harassment and sexualised bullying.

When we launched our Future Girl consultation to gain girls' views on what they want to see happen to improve their lives, we aimed for 10,000 young members to participate. At its close on 15 July 2018, more than 76,000 girls had taken part, across all sections of Girlguiding - Rainbows, Brownies, Guides and Senior Section. Future Girl will help us create our new mandate for change on the issues girls care about.

New programme

2.13 Our new programme, which launched on 21 July 2018, includes badges and activities that challenge gender stereotypes.

Our Aviation Badge, in partnership with easyJet, aims to help engage more girls in aviation and build a foundation for future study and a potential career as a pilot.

Our Coding badge, in partnership with Google, provides opportunities for girls to develop new technology skills through badge activities. According to our Girls' Attitudes Survey, one in three (30%) girls aged 11-16 think computing is "more for boys". Furthermore, only one in three (37%) 7-21 year olds would consider doing a job in technology.

We also partnered with Amey and Rolls Royce on an Innovate Skillsbuilder suite of badges around the theme of innovation to empower and encourage more girls and young women to consider careers in science, technology, engineering and maths.

Peer education

2.14 Girlguiding also runs peer education sessions to help girls tackle the pressures they face. *Free Being Me* helps girls recognise beauty myths, grow in confidence and be happy in their own skin. *Think Resilient* is designed to help girls build mental wellbeing and grow resilience.

Recommendations and girls' calls to the advertising industry

2.15 Girls aged 11 to 21 told us what they want to see:

- 95% said the advertising industry? should stop using gender stereotypes of men and women
- 95% of girls aged 11 to 21 think the advertising industry should show more positive, diverse representations of girls and women
- 88% said it should make sure all adverts that have been airbrushed are marked to say they have been altered
- 88% said it should stop using sexualised images of women and men
- 85% said it shouldn't advertise toys using gender stereotypes

'To me an equal society for men and women would be one where shampoo adverts also include men washing their hair provocatively while frolicking in the shower.' (Former Girlguiding Advocate, 16)

2.16 Girlguiding would also like to see the advertising industry and its regulators take action:

Through Engagement with Girls and Young Women

- a. Empower girls and young women to speak out and be heard on the impact of media sexism and stereotyping by making it easier for young people to lodge a complaint and making young people more aware of the process.
- b. The Committees of Advertising Practice (CAP), responsible for writing and maintaining the UK Advertising Codes, should work with girls and young women to create an advertising code that addresses their concerns.
- c. Endorse the use of resources to help girls recognise the tools and tricks advertisers use to influence young people.

'The media need to stop coverage of size 0 models and promote a healthier attitude towards body confidence and self-esteem.' (Laura, 21, Wakefield Girlguiding Member)

'Showing an equal variety of not only men and women but different races will provide a true equality in the media.' (Danielle, 16, Orpington Girlguiding Member)

Through Regulation and Guidance

- a. Support and endorse the Be Real campaign's Body Image Code.

The Code emphasises the need to show the varied roles women play in society and the diversity of women. Girls tell us that they want to see more women doing different jobs and a greater representation of the diversity diversity of women.

- b. Stop children's exposure to harmful sexualised content in advertising by promising to ensure the ASA and CAP codes operate on principles similar to those of the broadcast watershed.

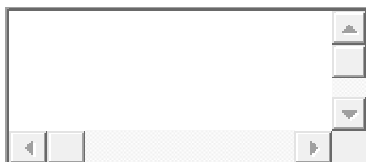
'The main barriers to equality are the misconceptions that are deeply ingrained in our culture and the stereotypes that are portrayed by the media. Equality requires a change in perception and attitudes, not just laws, which is currently the case.' (Former Girlguiding Advocate, 22)

Through Education

- c. Support the campaign to introduce gender equality and body confidence lessons in school to ensure girls are taught about photoshopping, airbrushing and gender stereotypes. The ASA should use its position as an expert authority to convince government of the positive difference this could make.
- d. Recognise the power of peer education and endorse resources that help young people increase their resilience to the images they see in advertising. Our *Free Being Me* global initiative helps to increase girls' body confidence, and not let concerns about their appearance hold them back from becoming active, responsible and confident citizens of the world.

'Girls are growing up surrounded by things that can make them feel bad about themselves - images of women photoshopped beyond recognition, sexist music videos and song lyrics, lads' mags... The list goes on. I spent most of my teenage years plagued by self-doubt. Had it been a requirement for my school to teach body confidence, then that angst would more than likely have been prevented.' (Nikki, 22, Southampton, former Girlguiding Advocate)

For these reasons, we believe the proposed new rule and supporting guidance are important and would have a positive impact on the issues we have raised in our response.



2. Do you agree with the wording of the proposed new CAP and BCAP rules? If not please include suggestions for how the proposed rules could be improved to achieve the aims set out in this consultation. *

- Yes
- No

Please include your suggestions. *

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. *

Yes

No

Please include suggested improvements. *

3.1 The consultation document indicates that the new rule is also designed to give a clearer basis on which to restrict ads that include potentially harmful or seriously offensive depictions of gender stereotypes on the grounds of objectification, inappropriate sexualisation and for depicting unhealthy thin body images (i.e. the aspects that are already regulated). It was difficult to find how and where the guidance related to these existing aspects, so it would be good to include reference to these areas and examples (similar to the useful ones given for characteristics, roles, conforming to stereotypes and other areas) to ensure advertisers and consumers are clear about what is acceptable and unacceptable.