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Rt Hon Caroline Nokes MP
Chair, Women and Equalities Committee
House of Lords
London
SW1A 0AA

23 October 2020

Dear Caroline Nokes,

Thank you for the opportunity to appear before the committee to give oral evidence to your inquiry 'Changing the perfect picture: an inquiry into body image'.

In response to your request for a written response, please find our answers to the following questions below.

Whilst you didn't include a written question about online advertising, we would like to share the following points.

When it comes on online advertising in particular, we believe more needs to be done to regulate this.

Our youth panels conducted an audit of adverts to review the ASAs gender stereotyping standards 6 months into effect and their research found some interesting disparities between online advertising and on other channels. We've shared the results with both the ASA and DCMS as part of their call for evidence into online advertising. They found

- girls viewed more harmful ads online when it came to the use of gender stereotypes, with a particular emphasis on harm caused by body and appearance issues.
- they felt ads on social media were more invasive - not just because of the content - but because they're embedded in the place they engage with friends and are harder to disengage from than say ads on TV
- girls felt ads on social media were more exploitative as they targeted them based on previous searches but also on stereotypical ideas of what, as young women, they might be interested in - orienting around beauty products or in some cases, weight loss products.
- they also raised the issue of confusion around influencers advertising products and that this wasn't always clear. We have seen action to address this issue. But we do feel like more could be done to make it clear when someone is advertising a product.
- there is a wider issue when it comes to addressing harmful and inappropriate online advertising that is currently accessible to those under the age of 18 as a result of children being able to easily access websites and social media platforms that aren't age appropriate due to ineffective age-verification tools. We think advertiser online must take this into account.

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Chief Guide: Amanda Medler Chief Executive: Angela Salt OBE

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1. What action is needed from social media companies to ensure their platforms aren't damaging young people's body image?

We believe social media can offer huge benefits to young people. Whether this is to connect with other or learn new things. However, we also believe children and young people are currently not protected from harm online.

Instagram announced last year they'd remove all plastic surgery filters - and whilst this hasn't been wholly successful as far as we understand, this is a step in the right direction and it would be great to see other platforms used by millions of children and young people do the same.

We believe social media sites should have clearer complaints procedures specifically linked to the promotion of an unrealistic body image and that children and young people are supported to know how to easily report this.

Harmful content must be removed quickly.

Platforms as well as online advertisers should bear in mind that children under the age of 13 are accessing the internet, whether they are intended for them or not, and therefore we believe they do have a responsibility to make sure that these platforms are safe for everyone.

We do believe better age-verification tools should be developed. For example, it's good that Instagram has banned adverts to under 18s about weight loss products - this would work if people were providing their real ages when they use these platforms.

2. Have you had any engagement with social media companies on improving body image and mental health of young people?

Nothing to add

3. Currently you need to be 13 years old to access most forms of social media. Do you think this is the appropriate age and how might this be better enforced?

We don't have evidence on this specifically. We believe children and young people should be engaged on decisions that affect them. Our research shows girls and young women support age restrictions on social media. We support better age-verification for social media. This would also help to address the harmful content including advertisements children see. Nearly all (91%) of girls and young women think there should be age limits on social media. And half think there should be better checks to ensure people are old enough to use social media.

4. Will the protections introduced in the Online Harms White Paper protect people from harmful content around body image?

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We believe the Online Harms White Paper provides an important opportunity to address the harm girls and young women face online. This must include the widespread and devastating harm caused by appearance pressures and body image issues online. We want to see the new duty of care include a definition of harm that results from appearance pressures and body image issues including bullying around appearance, harmful advertising around beauty, fitness and weight loss. We would like to see Ofcom as the new regulator work with social media sites to develop policies that tackle body image pressures and harms.

It could also be a mechanism to explore how social media sites explicitly indicate that the images on their platforms contain pictures that have been altered and are not real. And to work with social media sites to install better safeguards for children from inappropriate content they see as a result of accessing platforms intended for older audiences through age-verification.

5. What other action would you like the Government to take to reduce poor body image for young people today?

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 other's. 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.

We believe this is an equalities issue - as girls who are BAME, disabled or LGBTQ feel this 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.

There needs to be a combination of measures and actions to have a positive impact on this issue. They include:

- Giving children and young people the skills and confidence to navigate the pressures they face on a daily basis. To help them be critical of what they see online and offline, in the media and in the world around them. Girlguiding does this through our programme and we want to see this delivered in other areas including schools - where it's also important they create a positive, supportive environment where everyone feel confident to be themselves.
- We want to see a change in society in terms of our culture that currently values women for how they look instead of being celebrated for who they are and what they can achieve. We know this is important as girls grow up and see how women are represented and what is expected of them. In addition, it's important for girls to see women represented in their diversity - both in terms of how they look, but also what they can do. And the media could do more to show this.

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- We would like to see more effective regulations to ensure children and young people are better protected from the harm that is being caused by pressures and images that create widespread body image concerns - on and offline and across different media.
- Along with YoungMinds and many other organisations, we would like there to be a cross-government strategy on children and young people's mental health - and we believe body image and the experiences of different groups of children and young people, should be central to this.

We look forward to following the committee's activity and report into this important issue.

If I can be of any further assistance, please do not hesitate to contact me.

Yours sincerely,

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