# Written evidence submitted by the Nuffield Council on Bioethics

## Response to the House of Commons Digital, Culture, Media and Sport (DCMS) Sub-Committee on Online Harm and Disinformation's terms of reference

## September 2021

### Introduction

The Nuffield Council on Bioethics strongly supports the DCMS Sub-Committee on Online Harms and Disinformation's new inquiry into the Government's approach to tackling harmful online content and welcomes the opportunity to respond to this consultation. We are particularly concerned about the harmful influence of online content that promotes unrealistic body image ideals and contributes to appearance anxiety.

Our response will focus on the question – 'Does the draft Bill focus enough on the ways tech companies could be encouraged to consider safety and/or the risk of harm in platform design and the systems and processes that they put in place?'

We strongly support the recognition of a duty for service providers and the regulator to prevent and minimise the risk of online harm to individuals, including by taking into account how the design and operation of services may reduce or increase the risk of harm.

### Background

In June 2017, the Nuffield Council on Bioethics published a report Cosmetic procedure: *ethical issues* following a two-year inquiry.  Our report examined how cosmetic procedures are supplied in the UK context but also, importantly, what drives demand for those procedures. As part of this exploration of factors that might influence demand, we highlighted how the internet – and particularly social media sites – can contribute to rising levels of body dissatisfaction and anxiety about appearance. We considered this to be a key issue and we therefore made recommendations to encourage online providers to take action to tackle rising levels of body dissatisfaction and anxiety about appearance in young people.

### Does the draft Bill focus enough on the ways tech companies could be encouraged to consider safety and/or the risk of harm in platform design and the systems and processes that they put in place?

Given the nature of our work in this area, this answer will be focused on online harms relating to body image and appearance anxiety.

Many of the appearance-related pressures that we identified in our report are embedded in the technologies that are an increasingly important part of people's lives, including social media. During our inquiry, we found emerging research suggesting a link between social media use and appearance anxiety.[1] A recent report from the Women and Equalities Committee, to which we gave evidence, found that the majority of young people spend over

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[1] Recent research from the Mental Health Foundation and YouGov showed that 22 per cent of adults and 40 per cent of teenagers said that images on social media caused them to worry about their body image. See: Mental Health Foundation (2019) Body image: how we think and feel about our bodies.

2 hours on social media per day, and that social media had the biggest influence on their body image of all mediums. It was a similar situation for most adults, who also reported spending 2 hours of social media per day, and that social media was one of the biggest influences on how they felt about their appearance. [2]

This Bill recognises that tech companies must be more responsible for their users' safety online, for example by conducting risk assessments before making any changes to the design or operation of a service and by taking into account how the design and operation of the service may reduce or increase the risk of harm to individuals. We agree that tech companies to have a duty to operate a service designed to minimise risk of harm and illegal content.

In our report, we recommended that companies collaborate to fund an independent programme of work to understand better how social media may contribute to appearance anxiety, and how this can be minimised; and then should act on the findings. For example, the posting and sharing of photograph, the rating of appearance by peers (via "likes") and the practice of digitally altering photographs, are likely to be contributory factors. Alongside other social and economic factors, these may add to pressures to conform to particular appearance ideals, and could potentially have a negative impact on individuals' mental health and wellbeing. In fact, appearance anxiety and dissatisfaction have been linked to eating disorders, depressive symptoms and body dysmorphic disorder. While the evidence base is growing in this area, more research is needed to help better understand the nature of the link between social media use and growth in appearance anxiety.

We therefore support proposals for OFCOM to undertake and commission research to improve the evidence base around online harms and to oversee the fulfilment of companies' commitments to improve the ability of independent researchers to access their data, subject to appropriate safeguards.

We hope this information is helpful to your inquiry and we would be happy to provide more detail if necessary.


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**Director**

**Nuffield Council on Bioethics**

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[2] House of Commons Women and Equalities Committee (2021) Changing the perfect picture: an inquiry into body image. Available at:
https://committees.parliament.uk/publications/5357/documents/53751/default/