

## Written evidence submitted by Girlguiding (MISS0059)

### 1. Overview

- 1.1. As the leading charity for girls and young women in the UK, our submission is focused on our research which shows girls and young women face relentless and harmful pressures around their appearance and how they should look. We believe the experiences of girls and young women should be listened to, taken seriously and used to develop effective policy solutions.

### 2. Relevant 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 and safety on- and off-line.
- 2.2. Future Girl is our girl-led manifesto created with 76,000 girls and young women. They told us what they care about most and how we can create a more equal society. One of their priorities is our topic, Self-believer's, which aims to improve girls wellbeing. A core part of doing this is by addressing the pressures girls face around how they look.
- 2.3. Our research with girls during lockdown '[Early findings on the impact of Covid-19 on girls and young women](#)' revealed the crisis is having a significant impact on mental health including from appearance pressures online.
- 2.4. We reference quotes from our [Advocate](#) panel. Our 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. We would be delighted to arrange for members of the panel to provide oral evidence to the committee.
- 2.5. We also reference an unpublished audit of adverts that our youth panels of young women aged 14-25 have completed. The audit was to review the effectiveness of the new rules introduced by the Advertising Standards Authority which stated that adverts should not include harmful gender stereotypes. Members of our youth panels (Advocates and our British Youth Council delegation) undertook a review of adverts before the rule came into place (May-June 2019), and 6 months after (December 2019-January 2020).

### 3. Introduction

- 3.1. Girlguiding warmly welcomes this inquiry. Low body confidence is a serious issue for many girls and young women that limits their lives and opportunities. Girlguiding has been working for years to change perceptions so that it is understood as a serious social and health issue with multiple causal factors and addressed by decision makers. We recognise some progress has been made, but we believe more can be done.

### 4. The scale of poor body confidence for girls

4.1. 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. Girls are exposed to restrictive ideas of what is expected of them and these stereotypes reinforce the idea that girls and women's value lie in their appearance. Whereas boys value lies in their actions. Girls see these messages repeated day after day from a young age. And it takes its toll. We believe that to address low body confidence in girls, we must remove the pressures they face and dramatically change how women are represented in the media. We also believe this must be done alongside wider measures to address gender equality including tackling violence and abuse on-and off-line, increasing the diversity of women in the public eye such as in leadership roles and work to ensure women in sport are equally respected and celebrated as men for their contributions and achievements.

*I remember one commentator (during the World Cup) saying more people would watch women's football if their shirts were tighter – Alice, Advocate, 14*

4.2. 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%.

4.3. 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

4.4. In addition, the way girls look can be a source of bullying. In 2019, 25% of girls aged 7-10 and 44% aged 11-21 have been bullied about how they look (2019)

*'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*

4.5. Girls face pressures around their bodies when it comes to periods. Our 2018 survey found of girls aged 11-21 that:

- 52% have experienced boys making insulting jokes about girls and their periods
- 42% say having your period stops you doing things you enjoy such as sport or going out with friends

- 21% have been made to feel ashamed or embarrassed about their period

## 5. The impact (short and longer term)

- 5.1. 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 11-21 say the way they look holds them back most of the time.

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

*'It makes me less confident when it comes to meeting new people and enjoying myself'* -  
Young woman, 17-21, Girls' Attitudes Survey

- 5.2. In 2016, girls and young women aged 11-21 said low body confidence impacted what they felt able to do and the choices they have such as:
- wearing what they like (58%)
  - having their picture taken (52%)
  - taking part in sport or exercise (39%)
  - speaking up in class (36%)
- 5.3. Low body confidence and the pressures around their appearance affects how girls engage with sport and physical activity. We know that as children get older, girls are less likely to take part in sport and physical activity than boys, and feeling self-conscious because of how they look, or bullying and harassment that targets their appearance, contributes to this. It also affects the reasons girls give for doing exercise with some saying it is to lose weight than for the enjoyment of it.
- 48% aged 11-21 do sport to lose weight (2017)
  - 43% aged 11-21 say fear of being judged about their appearance stops them from taking part in physical activity (2017)
  - 52% aged 7-21 say they would enjoy PE and sport at school more if they could wear something they liked.

*'The only time I've ever felt body conscious growing up was in PE at school. It gave me a really negative relationship with exercise. Now as an adult I find exercising so much better as I can wear what makes me feel comfortable. My mental and physical health could have been improved if PE lessons were adapted to enable girls to feel more comfortable* – Emma,  
Advocate, 18

- 5.4. Girls believe the focus on theirs and women's appearance effects their future opportunities. For women leaders, girls see them facing barriers that men don't because of the emphasis placed on their appearance.
- 42% aged 11-21 think to be successful, women have to be attractive as well as good at what they do, whereas for men, it doesn't matter what they look like (2016)
  - 54% aged 7-10 think paying more attention to women's clothes than what they do means girls and women are treated less fairly than boys and men (2018)

- 77% aged 11-21 say judging women politicians and leaders for what they wear than what they say leads to girls and women being treated less fairly than boys and men (2018)

## 6. Specific groups affected

6.1. Girls and young women have diverse and intersectional experiences when it comes to the expectations and pressures they face around how they should look. We have collated quotes from our youth panels to help illustrate this.

*'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, Advocate, 19*

*'Many young women don't see themselves represented in the media or when they buy clothes. Models don't show you what they look like on your average person. Very few stores show their clothes using a mobility aid or wheelchair. Or show women's clothes that are classed as 'more masculine' in shop windows' – Alice, Advocate, 14*

*'As a young woman in a same sex relationship, I often feel there's a pressure on how I should look. Both me and my partner dress as we please, in skirts and dresses and look like society's idea of what straight women look like. I often feel as if people think that one of us should dress like a man so that we look like we are conforming to society's idea of a heterosexual couple. This creates an unnecessary stress in our relationship' - Anonymous, 22*

*'It's an understatement to say that there are challenges around body anxiety faced by women of colour. Colourism (shadeism) is a serious issue within communities of colour. As a young black woman, I have experienced this first-hand. 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. And this was just from friends at school. It's no secret that Britain is a predominantly white country, therefore naturally the media would reflect the majority. So not only is there a lack of black people and women in the media but a lack of black women. I'd go further to say, a lack of dark-skinned black women. When the media does show black women, they, in some way meet European beauty standards, lighter skin, looser curls, European facial features. When it's a dark skinned black woman, the portrayal is negative. Growing up, young black girls and everyone else would associate being a black woman with being big and loud. If your physical appearance is associated with negative personality traits, that too creates body anxiety. Because of my treatment at school and what I saw around me, I suffered from body anxiety. I hated myself and resorted to skin bleaching and straightening my hair to "rectify" the "problem". I found that trying to address the issue of colourism is where the racism would come about. Non-black people would argue it wasn't a problem or wasn't serious. Their lack of understanding of how colourism is rooted in racism is what made it racism. Even in the black community alone, darker skinned people are seen as less attractive and are bullied and made fun of. This is partly the reason why it's not taken seriously. My school did not know how to deal with the issue of colourism and bullying. In my*

*final year, one of my teachers brought two Year 7 girls to me. They explained their friend has low self-esteem due to being bullied by boys in her year for being a dark-skinned black girl and having afro hair. I spoke with her and she was not aware it was colourism, no one was aware. Some considered it to be racism but the boys bullying her were black. My teacher did not know what to do. This was not a new experience but she and everyone in that school were not equipped to handle such an issue’ - Jemmar, BYC Delegate, 20*

## **7. Mental health**

7.1. 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. We have seen a decline in girls happiness over the past decade through our research and we know that poor body confidence can affect how girls feel about themselves and of the world. External evidence shows that girls and young women in the UK report levels of wellbeing amongst the lowest in Europe and significantly lower than boys and young men in the UK, a significant factor identified as satisfaction with appearance.<sup>1</sup>

## **8. What contributes to poor body image**

8.1. We believe there are a number of causes for poor body image. These include the emphasis society at all levels places on how girls look (and on women), and 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. They see this reflected in how women in public life are criticised and scrutinised. 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. Girls face bullying and harassment about how they look including sexual harassment which contributes to poor body confidence – be it at school, on their way to and from home or online. We believe sexism means girls are specifically held back through criticisms of their bodies and appearance.

8.2. Our research shows that girls and young women face sexist bullying and sexual harassment and that this has a detrimental impact on their emotional wellbeing.

- 61% aged 11-21 had experienced some form of sexual harassment in school and almost half of girls (49%) said anxiety about potential sexual harassment affects their body confidence (2018)

8.3. Girls tell us that shopping for clothes reinforces the idea there is an ideal body.

*‘Whilst there are some examples of different sizes of models, they are still all quite tall. I’ve never felt clothes are modelled by anyone that looks like me. Buying clothes, particularly online, is difficult especially working out how long things will be. E.g. a mini dress comes to my knees. It means a lot of clothes don’t fit properly because they are made for someone of a different height with the waist and bust in a completely different place’ – Kate, Advocate, 18*

## **9. The effect of media sexism on body confidence**

9.1. 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)

*'Many girls feel like if they don't have the Love Island body, they aren't worthy'* - Alice, Advocate, 14

9.2. Girls want more to be done to diversify the images and stories the media tells of women's lives. In 2017, nearly all girls (95%) said they want to see magazines and newspapers show more realistic images and stories of women.

*'I unconsciously criticise myself without realising. It's all from years of seeing perfect models, even if you believe it paints a bad picture, it's still engrained in your head. Having a variety of body types would be better. And showing that not everyone is 'perfect' all the time.*

*It was only recently, after seeing body positive influencers, that I realised what bloating actually is and how it's normal - before I would have thought about it negatively and that I'd suddenly gained weight but I'm fact it's simply my body processing food!' - Hen, Advocate,*

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## **10. Social media and its impact on body confidence**

10.1. Our evidence shows that social media can be an important way for young women to connect, learn and have their voices heard. However, it can also have a negative impact on girls' body confidence. Our research shows that pressures they face can be intensified by social media. Girls aged 11-21 told us:

- 71% filter the pictures they post on social media most or sometimes (2019)
- 59% think one of the main causes of stress among girls is the pressure from social media (2018 survey)
- 45% check their phone first thing in the morning and last thing at night (2019)
- 41% say they'd like to spend less time on social media (2019)

- 46% say they respond to online pressures by reminding themselves that social media isn't a reflection of reality (2019).

*'On social media, I feel like I have to look pretty all the time'* - Girl, 11-16, Girls' Attitudes Survey

- 10.2. Our research shows the scale of online abuse and bullying girls can be exposed to, which can take the form of bullying around girls' appearance.
- 50% think sexism is worse online than offline (2016)
  - 50% aged 7-10 and 36% 11-16 are worried about bullying online (2018)
  - 47% aged 11-21 had unkind things said to them on social media (2018)
  - 25% aged 11-21 had experienced cyber-bullying, rising to 41% among those identifying as LGBTQ+ (37% had experienced homophobic or biphobic comments)
  - 24% have had sexist comments made to them (2018)
  - 22% aged 11-21 had embarrassing photos of them sent to other people at school/college/university (2018)
  - 8% aged 13-21 had a sexual photo of them shared without their consent (2018)
  - 80% aged 11-21 think more should be done to tackle sexism and abuse online (2016)

## 11. Social media during Covid-19

- 11.1. Our [research](#) with girls during lockdown revealed that girls and young women are spending more time on social media during lockdown, with 85% of girls aged 15-18 saying this. Many are keeping connected this way with 78% saying they've used new apps and games to communicate with friends and family. But with increased time online, they're facing increased pressures on social media including to look a certain way, e.g. lose weight or exercise (26%) and be online all the time (20%).

*'I'm struggling with pressures to use this time to lose weight and get a 'summer body'* - Young woman, 15-18, Covid-19 report

## 12. Adverts

- 12.1. Our research reveals the extent to which girls are exposed to advertising content that implies women and girls have a limited and particular role to play in society. In 2017, 42% aged 11-21 said they'd seen adverts in the past week that portray women in a way that they think is sexist. 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+)
- 12.2. When it comes online advertising, girls (and all children) are exposed to inappropriate adverts for their age group, as they often use platforms designed for older age groups<sup>2</sup>.

The way in which boys' and girls' access and use the internet could determine the type of online advertising they're exposed to, and the harmful messages they're being sent. Boys are more likely to access internet via a games console, and to be playing games online, whereas girls are more likely to access the internet via their phones and to use social networking sites and during a consultation we ran to respond to the DCMS online advertising call for evidence, girls and young women raised concern over the ways they believed they are targeted by online ads that focus on their appearance.

- 12.3. The results of our youth panels' gender stereotypes in advertising audit showed that the number of harmful adverts they saw on TV, billboards and in magazine had decreased in the 6 months that new ASA gender stereotyping standards had come into force in June 2019. However, this was not the case for online advertising. Here the number of harmful ads increased, meaning that online advertising is not reflecting the rest of the industry, possibly because of the nature of targeted ads.
- 12.4. The audit also showed that 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. Most of these ads wouldn't be considered 'harmful' under the guidance. However, it's clear that they still have a negative impact on girls and young women, with many of them stating they felt sad, uncomfortable, self-conscious and inadequate when they saw such images.
- 12.5. We asked our youth panel members what they thought about the impact of online advertising. Here's what they had to say:

*'On social media I rarely see a variety of different body types which makes me feel that there is something wrong with my body and the way that I look. I think that 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 weigh 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 harmful ads'* – Grace, BYC, 16

*'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. It's harder, sometimes impossible, to tell if these are adverts, making audiences more susceptible to what they are presenting. Each advert may not be 'outrageous' enough to be banned, yet it can enforce a negative view on your own body as you see the 'perfect' images constantly'* – Hen, Advocate, 15

### **13. Content around diet culture**

- 13.1. The extent to which the pressure to lose weight impacts on girls is significant. And this affects girls from a young age with 40% aged 7-10 saying they feel like they should lose weight in our 2016 survey. Our 2018 survey with girls aged 11-21 showed:
  - 62% would like to lose weight
  - 50% have been on a diet
  - 33% sometimes skip meals to lose weight



- 22% have tried a diet after hearing about a celebrity using it

*'It's interesting that influencers who seek to educate their audiences on 'taboo' topics such as periods or sex education have their posts demonetized. However, those who choose to promote harmful products such as skinny teas are able to earn thousands of pounds from brand deals. The government must do more to help regulate and promote the right content to girls and young women' - Phoebe, 19, Advocate*

#### **14. Content around cosmetic procedures**

14.1. Girls tell us about the pressures they face to change how they look through cosmetic procedures. In 2018, almost a third of girls and young women aged 11-21 say they would consider cosmetic procedures such as Botox or lip fillers (30%) and cosmetic surgery (29%). In 2019, just over half (55%) aged 11-21 said there shouldn't be adverts for plastic surgery or diet pills during shows that are mainly watched by young women.

#### **15. What ads have a positive impact on body image?**

15.1. As part of the audit of adverts that our youth panels conducted, they did highlight examples of ads they thought were positive. This was because they showed diverse images and content of women and girls that challenges 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.

#### **16. Has government policy improved body image?**

- 16.1. Our research shows that girls and young women want more to be done in schools around tackling appearance pressures. We welcomed the inclusion of this in the new Health Education curriculum (due to come into force this September) where we will continue to listen to girls about how this gives them the information they need to critically engage with the media so they don't feel pressured to aspire to images they see in the media that aren't real.
- 16.2. We welcomed the Online Harms White Paper and [responded](#) calling for the new duty of care for online providers to consider appearance pressures in its definition of online harms, and that this understands the gendered nature of this pressure that disproportionately impacts girls and women. We believe Ofcom in its role as the new regulator should ensure social media sites include policies to tackle body image pressures and enable greater diversity when it comes to representation. We believe the new regulator should engage girls and young women in the development and enforcement of the new duty of care to ensure its effective implementation including empowering them to understand its purpose and report concerns. We also believe it should ensure social media sites have better safeguards in place to prevent children being exposed to inappropriate content they see as a result of accessing platforms intended for older audiences.

#### **17. What strategy should the government take to encourage healthy body image?**

17.1. We believe the government should collaborate with a diversity of girls and young women to develop a strategy that addresses the serious issue of low body confidence and appearance pressures. This must sit across government departments to address gaps be it in the media or education. We also believe that whilst building children and young people's resilience is important, this must go hand in hand with government

action to address the unacceptable pressures they face growing up in the current environment of relentless and sophisticated messaging that impact how they feel about themselves, their wellbeing and opportunities in life. We believe government should work with the media, businesses and civil society to do this.

**18. Is there enough research and data to support government in creating policy around body image and social media?**

18.1. We have a wealth of insight from girls about how pressures on social media affect how they feel about their looks and bodies. This is a fast-changing area and we believe action should be taken swiftly following the Online Harms White paper and take into account responses including our own with girls' calls for specific policy changes.

**19. Will proposals in the Online Harms White Paper protect people from potential harm caused by social media content around body image?**

19.1. We believe there are a number of ways the online harms proposals including a duty of care could help to address issues around body image if steps are taken by the new regulator, Ofcom, to outline how harms around this issue will be tackled.

**20. Do companies advertise their goods and services responsibly in relation to promoting positive body image?**

20.1. We believe that 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.

**21. What is the role of the ASA in promoting diversity and a positive body image online and TV/ radio?**

21.1. We believe the ASA has an important role in setting the standard for advertisers, and as such, could explore further how body image and the harms people face in this area could be better addressed in adverts, both on- and off-line.

**22. How successful is the ASA at protecting the public from ads that have a negative impact on body image?**

22.1. An unpublished audit of adverts conducted by our youth panels into how well the gender stereotypes standards were being adhered to found that 6 months on, they had made a significant difference. And girls were pleased to see where ads had been banned as a result. However, we found that online ads were still considered to include harmful ads that caused harm around body image and we would be keen for the ASA to explore this area further.

**23. Girlguiding's recommendations**

**The media**

23.1. The media should commit to greater responsibility to represent the diversity of women, their roles and achievements, focusing on what women and girls can accomplish than their value being solely around their appearance.

## Advertising

23.2. Girlguiding believes that advertisers should not aim to directly target and influence children under the age of 18. It is inevitable that children will see advertisements.

Therefore, we recommend the following based on our research

- a) **The ASA should pay attention to the need for more diversity in advertising both on- and off-line.** Our research shows that girls and young women want to see more diversity in advertising including a diversity of body types, ethnicities, sexualities, and disabilities. And a diversity of stories and roles that girls and women in society have.
- b) **The ASA standards around gender stereotypes should be reviewed to ensure the definition of gender stereotypes and harm include the harm caused by images of women being objectified, passive, sexualised and using a narrow beauty ideal.** We believe that the current definition of gender stereotypes that cause harm are inadequate and more could be done to address the harms caused by adverts that use stereotypical depictions of women that focus on their appearance as their value and use limited ideals of beauty which causes harm.
- c) **More should be done to hold online advertisements to account so that they follow the ASA standards around gender stereotypes.** Our unpublished audit of adverts showed that girls were viewing more harmful ads online than other media suggesting more action is needed to ensure they follow the rules set by the ASA.
- d) **Online advertising should not include content inappropriate to children on sites accessible to those under the age of 18.** Considering that children as young as five are using the internet and are accessing a number of websites and social media platforms despite age restrictions, it's important that online advertisers take this into account. We recommend that any developments within online advertising should reflect the ICO's age appropriate design code of practice, and ongoing online harms and media literacy work, to ensure that the internet is a safe and enjoyable place for all. In addition to this, we recommend that online advertisers consider new technological tools and methods of age-verification, for example, the British Board Film Classification are currently working on an age-rating tool for online video content which could also be applied to online advertisements.
- e) **Advertisements should avoid using airbrushed images, and clearly label adverts where it is used.** Girlguiding is concerned about the impact that airbrushing can have on girls. Although many are aware of advertisers' use of airbrushing to create and present idealised bodies, some girls and young women say that this still has a negative effect on them. Our research shows that 88% of girls aged 11 to 21 said the advertising industry should make sure all adverts that have been airbrushed are marked to say they have been altered. Girlguiding believes that media outlets should avoid using airbrushing and that, where it is used, it should be clearly labelled as such, and this includes online advertising, to ensure people know these images aren't real.
- f) **There should be greater restrictions on the promotion and sale of diet products to children and young people (under 18).** We would like to see greater restrictions on the promotion and sale of diet products to children and young people (under 18) by not showing them before the watershed, on public billboards or on social media. We believe social media sites should have clearer complaints procedures specifically linked to diet products and their promotion of an unrealistic body image so that young people can report when they feel

pressured to change their appearance as a result of these advertisements. Finally, on this, we believe weight loss materials in public spaces or those frequented by children should be out of sight of children and understand these are sometimes visible in youth and educational settings where weight loss groups meet.

- g) **We want to see all adverts for surgical and non-surgical cosmetic procedures to be in line with the watershed and not visible to children under 18 (be this on TV, online or on Billboards).** We believe that this industry must be properly regulated and a minimum age restriction of 18 implemented where this is not connected to medical reasons for procedures. We believe at present, there are insufficient standards set by the ASA on this and it is having a detrimental impact on girls and young women's lives.
- h) **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.

### **Social media**

23.3. We believe social media platforms must address the ways it's policies reinforce appearance pressures as part of the urgent progress of the Online Harms White Paper by ensuring:

- the new duty of care for online platforms includes a definition of harms that result from appearance pressures
- harms online that result from bullying acknowledge the gendered nature of bullying around appearance that affects girls and young women disproportionately and the impact it has on their mental health
- the new regulator works with social media sites to develop policies that tackle body image pressures and enable greater diversity when it comes to representation
- social media sites clearly and explicitly indicate that the images on their platforms contain pictures that have been altered and are not real
- engagement of girls and young women the development and enforcement of the new duty of care to ensure its effective implementation and so they are empowered to understand its purpose and report concerns
- social media sites have better protections for children from inappropriate content they see as a result of accessing platforms intended for older audiences by putting in place safeguards to ensure children are not using these sites.

### **Education**

23.4. We want to see the new Sex and Relationship Education and Health Education implemented effectively and monitored by Ofsted including supporting children and young people to engage critically with the media and images they are exposed to daily so that they don't feel pressured to aspire to images they see in the media that aren't real.

23.5. We support the implementation of Ofsted's updated regulations to inspect schools on wellbeing and believe this must look at the gendered pressure girls and young women face to effectively support their mental health, which includes pressures around their appearance. We believe during this recovery period from the crisis, this must be a priority.

### **Girlguiding activity**

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. Our theme Be Well includes badges such as Healthy Mind, and our peer education resources Free Being Me supports girls to critically look at the beauty ideal they see and understand how these pressures may be affecting them in a supportive and inclusive environment.

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.

### **About us**

Girlguiding is the leading charity for girls and young women in the UK, with almost 500,000 members. Thanks to the dedication and support of 100,000 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.

July 2020

### **Endnotes**

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<sup>1</sup> The Children's Society's Good Childhood reports (2015-2019)

<sup>2</sup> CHILDWISE. (2020). The Monitor Report 2020