CAP and BCAP consultation on the sexual portrayal of under 18s in advertising

Girlguiding response (January 2017)

**About Girlguiding**

1. Girlguiding is the leading charity for girls and young women in the UK, with over 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 (5–7 years), Brownies (7–10 years), Guides (10–14 years) and The Senior Section (14–25 years). Registered Charity No 306016. [www.girlguiding.org.uk](http://www.girlguiding.org.uk)

**About our evidence**

1. Girlguiding’s submission focuses on evidence from our annual Girls’ Attitudes Survey – the largest survey of girls and young women in the UK – which gathers the views and opinions of over 1,600 girls and young women throughout the country aged 7 to 21, from inside and outside guiding. For more information and data on the latest and previous reports please see [www.girlguiding.org.uk/girlsattitudes](http://www.girlguiding.org.uk/girlsattitudes).
2. Girlguiding’s response is also influenced by the *Girls Matter* campaign – Girlguiding’s member-led campaign that profiles girls' and young women's calls for change <http://new.girlguiding.org.uk/report>
3. We also made use of our 2016 qualitative research report, *Girls’ Wellbeing Explored – Understanding Pressures and Resilience,* which explores the pressures faced by girls and young women and the impact of these on their emotional wellbeing and mental health. <https://www.girlguiding.org.uk/social-action-advocacy-and-campaigns/research/mental-well-being/>
4. In addition, our response includes quotes from members of our Girlguiding Advocate panel – a platform for girls to use their voices and seek change at the highest levels. Our Advocates are a group of 18 Girlguiding members aged 14 to 25 who lead the direction of Girlguiding's advocacy and research.

**Overview**

1. Girlguiding welcomes CAP and BCAP’s proposal to extend current rules prohibiting the sexual portrayal of children in adverts from those under 16 to those under 18. Our research tells us that girls feel that there is too much female nudity in advertising and that the media too often shows women as sex objects, which can make them feel disempowered. Girls tell us they would like to see fewer sexualised images of women of any age, but that this is particularly important when the model or actor is/appears to be under 18. They also feel that the abundance of sexualised images of women has an extremely negative impact on girls’ body confidence and contributes to a culture in which women are valued more for their appearance than ability and in which sexism and harassment are frequently normalised. Unsurprisingly, girls tell us that such pressures are having a hugely negative impact on their emotional wellbeing and mental health. Girlguiding believes that this cannot and must not continue.

*‘We need… changes in advertising and the media to stop sexualising women…’* (Girls’ Attitudes Survey participant)

Girlguiding is particularly well-placed to respond to this consultation due to our extensive research and campaign activities in this area. Our Girls’ Attitudes Survey has included questions on the sexualised portrayal of girls and women in the media over the years and we have actively called for advertisers to address the unfair and unequal representation of girls and young women since 2007. Our report published in that year, *Under 10 and under pressure*, examined girls’ perception of body image. In 2010 we campaigned to introduce compulsory labelling to distinguish between airbrushed and natural images and, during the 2015 General Election, our *Girls Matter* campaign called on the next government to stop children’s exposure to harmful sexualised content in mainstream media and empower girls to speak out on the impact of media sexism and stereotyping. While we recognise that the emphasis within this consultation is on the age of the models or actors featured in adverts (as opposed to that of the viewing audience being exposed to content), our research with girls and young women leads us to support any moves to reduce the huge number of sexualised images of women which they see on a daily basis.

Throughout this response, we outline our evidence relating to the sexualisation of women and girls in advertising as well as putting forward certain key issues which we feel require further consideration in order to ensure that the challenges faced by girls and young women are addressed meaningfully and effectively. These include the related area of gender stereotyping in advertising and the need to consider findings in conjunction with those from the recent ASA consultation on this subject as well as the potential challenges involved with determining whether portrayals are ‘sexualised’ and/or ‘responsibly’ so. While we recognise that the consultation raises important issues regarding the presentation of children and young people in general, as the leading UK charity for girls and young women, our response will focus on the portrayal of female models/actors (and the impact of this portrayal on girls and young women).

**Safeguarding children and young people featuring in adverts**

1. Girlguiding supports the proposed changes because, in line with our commitment to protect and safeguard children, we take the position that young people aged under 18 should not be portrayed in a sexualised way in advertising (or any form of media). While we agree that it is important to present issues such as sexual health in a realistic and accessible way, we believe that this does not have to involve sexualised portrayals of 16 and 17 year olds and that any such adverts should avoid the sexual objectification of girls and young women (and, indeed, all children) under the age of 18.

We support CAP and BCAP’s aim of reducing the sexualisation of under 18s. We also believe that it is positive to give advertisers greater clarity on how they can present 16 and 17 year olds. In addition, we agree that it is irrelevant that the national age of sexual consent is 16, as the rules outlined in this consultation relate to the *public* portrayal of children (as opposed to the private choices of individuals).

**Objectification of girls and women in the media**

1. In addition, we support the proposal because our research shows that girls and young women are concerned about the impact that advertising – including on TV and radio, online and in magazines and newspapers – is having on their lives and are critical of the ways in which girls and women are portrayed.

*‘If I could change one thing… I would reduce objectification of women’s bodies in the media’* (2015 Girls’ Attitudes Survey participant)

Our Girls’ Attitudes Surveys revealed that:

* 61% of 13 to 21 year olds feel that when women are portrayed as ‘sex objects’ it makes girls feel disempowered (2016)
* 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 (2016)
* 52% had seen women pictured in newspapers or magazines in a sexualised way that made them feel uncomfortable (2015)

Furthermore, the proportion of girls who don’t think women are portrayed fairly in the media has almost doubled in five years, rising from 27% in 2010 to 48% in 2015.

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

A recurring theme within the feedback girls give us is the unnecessary nature of the nudity and near nudity of women in adverts – for example, where an actor/model’s sexualised portrayal is entirely unrelated to the product being advertised. Girls also dislike that women’s portrayal is far more sexualised than that of men within similar kinds of adverts. As one Advocate put it:

*‘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)

**Sexualised portrayal of children under 18**

1. Although girls tell us that they want to see a reduction in the sexualised portrayal of women of any age, this seems to be particularly important where the model featured is – or appears to be – under 18. One Advocate highlighted:

*‘I think that it's a good idea for 16 and 17 year olds to be protected from sexualisation in the media. Although the age of consent is 16, 16 and 17 year olds are in a phase of transition between adolescence and adulthood and are facing many pressures so shouldn't be subjected to blatant objectification.’* (Katie, 16, Girlguiding Advocate)

‘*What's also really important is the apparent age [of an actor/model] to the viewer. Someone over the age of 18 could be dressed and made up to look childlike, which raises many questions as it could be seen to be encouraging adults to view children under 18 in a sexual way. If sexual content is to be used in advertising, it should be made completely clear that the participants are adults and that the act is consensual.*’ (Katie, 16, Girlguiding Advocate)

**The impact of objectification**

*‘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)

**Adverse treatment in society**

1. Our 2016 Girls’ Attitudes Survey shows that girls feel that objectification of women in the media negatively affects how women are treated in society:
* 53% of 11 to 21 year olds feel that people make girls think that how they look is the most important thing about them
* 75% of 11 to 21 year olds feel that women are more judged on their appearance than their ability.

Furthermore, girls feel that the widespread availability of pornographic images is contributing to the problem, with 68% of 13 to 21 year olds feeling that online pornography is influencing how women are portrayed in advertising and in the media (2016) and 80% feeling that pornography encourages society to view women as sex objects (2015). Girls also told us that such objectification made them feel unsafe, with 71% feeling that pornography makes aggressive and violent behaviour towards women seem normal and 71% feeling that it sends out confusing messages about consent.

*‘We don’t want to be objectified. It has a negative impact not only on women but also on men and young boys, and changing this could lead to a decrease in gender-based violence.’* (Girls’ Attitudes Survey Participant)

**Body confidence issues**

1. Our Girls’ Attitudes Surveys have consistently found that what girls see in the media has a big influence on how they perceive their own bodies:

* 37% of girls aged 11 to 21 say they compare themselves to celebrities most of the time or often and a further 29% do this sometimes (2016)
* 33% think they are more likely to be successful if they look like celebrities, rising to 43% among those aged 17 to 21 (2014)
* Almost half of girls (45%) sometimes feel ashamed of the way they look because they are not like girls and women in the media (2014) – this impacts girls as young as seven, 40% of whom say they feel embarrassed by how they look (2016)

During research for our 2016 ‘*Girls’ Wellbeing Explored*’ report, our focus groups confirmed that the widespread sexual objectification of women’s bodies across media channels is shaping girls’ expectations in relation to their own bodies and that this is a key area of anxiety and concern for them. Women are frequently portrayed in certain ways in the media, popular culture, society and pornography that young people are exposed to. Advertising forms a crucial part of this visual culture and can mirror and reinforce stereotyped and sexualised portrayals and ideals found in other areas of media culture. These ideals are pervasive and seep into girls’ everyday lives.

*‘The media is always telling you how to look. You’ve always like got to look good. You feel like you’re in competition with other girls.*’(Young woman aged 16 to 18)

*‘You see photos of pretty girls and boys expect too much from girls. They expect like a model at our age which is a bit ridiculous. They expect a girl to like be skinny but have big boobs and a big bum. I think it’s also like it’s what’s in your head. You think that’s what they want. But you don’t actually know.*’ (Girl aged 11 to 15)

**Broader mental health concerns**

1. At Girlguiding we recognise that such pressures can combine to produce a broader impact on mental health – one of the key areas of concern identified by girls in our Girls’ Attitudes Surveys. Worryingly, 58% of girls aged 13 to 21 had experienced mental health issues (2015) and 69% of those aged 7 to 21 feel like they are ‘not good enough’ (2016).

**Related issues and considerations**

**Gender stereotyping**

1. CAP and BCAP’s proposal to extend current rules to cover 16 and 17 year olds is a positive step. In addition, the issue of sexualisation of girls and women in advertising should not be considered in isolation but rather alongside the strongly related – and equally damaging - issue of gender stereotyping in advertising.

Girls report that they are surrounded by negative, limiting and stereotypical portrayals of girls and women and the vast majority of those responding to our Girls’ Attitudes Surveys recognised how widespread a problem this is and the impact it has.

Our Girls’ Attitudes Surveys show that:

(2014)

* 69% of girls and young women aged 11 to 21 have noticed sexism in the media, including advertisements.
* 75% say that the women usually shown in the media are all too much alike, for example in body size and shape, ethnicity, age and profession.
* 65% agree that women too often 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.

(2016)

* 52% of 11 to 21 year olds felt that seeing gender stereotypes makes them feel that they might be held back in life because they are a girl
* 78% of respondents said that they would like to live in a world without gender stereotypes.

*‘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)

**Gender and advertising**

1. Given the inter-connectedness of issues of sexualisation and gender stereotyping,

Girlguiding believes that it is crucial that the findings from this consultation are considered alongside those from the recent ASA consultation on gender stereotyping, which Girlguiding also submitted a [response](https://www.girlguiding.org.uk/globalassets/docs-and-resources/research-and-campaigns/asa-gender-stereotyping-in-adverts--girlguiding-response-june-2016.pdf) to. We consider it vital that a gendered approach is taken in analysing findings around sexualisation within advertising because this is an issue that disproportionately affects girls and women (although it has a negative impact on everyone).

The means of determining whether content is ‘sexualised’ or ‘responsible’ must be carefully considered to ensure that girls and women are not unintentionally discriminated against and their voices must be at the heart of this work. Examples of such unintentional discrimination could include judging content as sexualised simply because it includes a female body or judging the same position/facial expression/action as sexualised when it is performed by a female actor but not by a male. This is important due to girls’ belief that they are ‘judged more harshly for sexual behaviour seen as acceptable for boys’ – a statement with which 75% of 11 to 21 year old respondents to the 2016 Girls’ Attitudes Survey agreed.

Relatedly, within Annex 1 of this consultation it is notable that every image judged to be ‘sexually suggestive’ or ‘overtly sexual’ features a female actor, with just two also including a male. The only portrayal of a lone male appears within an image that is ‘mild’ or ‘non-sexual’ in nature. Furthermore, within the ‘sexual’ images, it is primarily the woman whose attire or facial expression renders the image ‘sexualised’ (by the criteria given within the annex). Examples of this include the woman pulling back her bra-strap and the woman showing evident pleasure while the man with her – whose face is obscured – features much less prominently. While we do not dispute that these images are sexual in nature – or that there are far more available images that sexualise women - we would suggest that it would have been appropriate to include a more gender-balanced representation of actors and models in the annex (and, indeed, within the examples used by the ASA to determine whether content is sexual in nature). This could be achieved by including images of males on their own and/or wearing ‘sexually suggestive’ attire in the guidance to assist advertisers (and ASA representatives investigating complaints) to appropriately judge whether content featuring males is sexualised and challenge the idea that women are or should be the only objects of sexual consumption.

**Conclusion and what girls want**

1. Girlguiding believes that it is important to avoid sexualising women in adverts –

particularly where they are or appear to be under 18. We also believe that, through adapting their codes to consider and address the underlying issues of sexism and objectification we have described, CAP and BCAP can play an important role in helping to challenge and change the current culture of sexualisation faced by girls and women. We propose that it will be valuable to consider the findings from this consultation alongside those from the ASA consultation on gender stereotyping – which Girlguiding also responded to.

In terms of ‘responsible exemptions’, we believe that sexual health campaigns and other similar content should be realistic and accessible, but that this should not involve objectifying 16 and 17 year olds. We also feel that determinations such as whether content is ‘sexualised’ or ‘responsible’ should be carefully considered using a gendered perspective.

Going forward, we would welcome more details about when and how these proposals would be implemented and what measures will be taken to ensure that advertisers adhere to them.

In terms of addressing the issues we have outlined, girls have a number of ideas which we believe should be considered by bodies such as CAP, BCAP and the ASA alongside the welcome proposal to prevent the sexualised portrayal of 16 and 17 year olds.

In 2014 we asked young women aged 17 to 21 what they would like to see media organisations - including advertisers – 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.
* 83% think they should make sure that there is more difference represented among the women in the media.
* 77% agree that they should agree not to show airbrushed images of women.

**Girlguiding recommendations**

1. Girls tell us they want to see the advertising industry do more to tackle the sexualisation of girls and women and gender stereotyping and to promote gender equality. In order for this to happen, Girlguiding would like to see the advertising industry and its regulators take action through:

**Engagement with Girls and Young Women**

* 1. 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.
	2. Going forward, CAP and BCAP should work with girls and young women to create an advertising code that addresses their concerns.
	3. Endorse the use of resources to help young people recognise the tools and tricks advertisers use to influence young people.

**Regulation and Guidance**

1. Support and endorse the [Be Real campaign’s Body Image Code](http://www.berealcampaign.co.uk/). The Code emphasises the need to show the varied roles that women play in our 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 of women.
2. Stop children's exposure to harmful sexualised content in advertising by promising to ensure the CAP code operates on principles similar to those of the broadcast watershed.
3. Help promote body confidence and reduce pressures on girls by discouraging the use of airbrushing. Girlguiding would welcome the opportunity to work with CAP in particular to explore how we could encourage advertising agencies to move away from using damaging and harmful airbrushing of bodies that create unrealistic expectations and representations of how bodies look to young people. This could include the development of a kitemark to support advertisers to consider the role and appeal of not using airbrushing.

*‘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

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