



The sexual portrayal of under-18s in advertising

The Children's Society's written submission to Committee of Advertising Practice and Broadcast Committee of Advertising Practice's proposals for new rules

About The Children's Society

The Children's Society is a leading charity committed to improving the lives of thousands of children and young people every year. We work across the country with the most disadvantaged children through our specialist services. Our direct work with vulnerable groups including missing children, children with experiences of sexual exploitation, children in or leaving care, refugee, and migrant and trafficked children, means that we can place the voices of children at the centre of our work.

Our well-being research

We have been studying children's subjective well-being since 2005. Our Good Childhood Inquiry, launched in 2006, was the first independent national inquiry into childhood that sought to better understand modern childhood from children themselves. The final report includes a set of recommendations for parents, teachers, the government and society more broadly. We have produced annual reports reviewing children's subjective well-being since 2012 and have analysed the impact of a range of factors affecting the way children feel about their lives. We believe that it is only by listening to children and understanding their personal experiences that we can give them the best chance of flourishing.

Introduction and key recommendations

We welcome this important and timely review into the sexual portrayal of under-18s in advertising. Numerous reviews¹ and studies have presented a strong case that children are being prematurely sexualised by media and commercial culture² and we are concerned that this is having a very detrimental impact on their well-being and is not well recognised or acknowledged.

The Children's Society believes that companies should market their products in a responsible way and should not be encouraging adults to view children in a sexualised manner nor encourage children to regard themselves as sexual objects. This should be the case not only for adverts aimed at children but also for all adverts children and young people may easily and inadvertently view. We believe that all adverts should undergo child impact assessments. The potential impact they may have on adults should also be assessed. For example, any adverts seen to normalise the sexualisation of children or young people should be prohibited irrespective of the target audience, scheduled timing of the advert or the product that it seeks to endorse.

As well as regulating and restricting such depictions in advertising, children and young people should have access to good quality and statutory Personal, Social and Health Education (PSHE) in schools to ensure

they adopt a critical attitude to what they view in the media, including in adverts and to learn about sex and sexuality in a safe and supportive environment.

This submission is based on learning from our national well-being programme and our local well-being consultations with children and young people in school and community settings. Our evidence is also informed by our experience working with children and young people affected by CSE and from our policy research in this area.

We have included direct quotes from children and young people. We have chosen not to edit or censor the words of young people in order to provide a true reflection of how they perceive these issues. Our local well-being consultations provide a space for children and young people to record the words they thought reflected compliments, insults, kind words and unkind words. The words they recorded were not necessarily a record of language they normally use but of language they are familiar with.

Based on our research and direct work with children and young people we have developed the following recommendations to help inform CAP and BCAP's review of the rules relating to the sexual portrayal of under-18s.

Key considerations:

- ***Sexualised violence depicted in advertisements.*** CAP and BCAP should review the use of violence including sexualised violence in advertising as part of their regulations on the sexual portrayal of children in ads.
- ***Regulations around who features in ads.*** We believe that children and young people should be protected from all forms of exposure to inappropriate and sexualised advertising irrespective of the perceived level of harm associated with the product being promoted. We urge the Committees to scrutinise the way in which celebrities synonymous with youth culture are used within ads across the board.
- ***Outreach and training by regulators.***
 - We recommend that BCAP and CAP develop an educational programme to work with schools and others working with children and young people make clear to young people how judgements are made over which ads are considered appropriate and which are not.
 - PSHE should include a topic about body image and should support children in evaluating critically the images they see and understand the nature of advertising.
 - The PSHE curriculum should be made statutory to ensure that all children have access to appropriate good quality education on the subject of body image and well-being.
- ***Strengthening national definition and guidance to tackle sexualisation of children in the media and promotion of good practice.*** We recommend that The Department for Culture Media and Sport should strengthen guidance on the sexualisation of children and young people in media to ensure there is a shared understanding and definition between media regulators of what constitutes inappropriate and harmful materials, including those that may be viewed by children.

Question:

1. Do you agree or disagree with the introduction of CAP rule 4.6 and BCAP rule 4.4? Please provide any relevant evidence or reasoning in support of your answer.

The Children's Society agree with the introduction of CAP rule 4.6 and BCAP rule 4.4 on restricting the portrayal or representation of anyone who seems to be under-18 in advertising with the exception of those aimed at promoting the welfare of under-18s.

We are satisfied with the evidence based reviewed and considered by the Committees surrounding the legal and policy context in this area. We particularly welcome consideration given to the provision and protection of young people aged 16 and 17 irrespective of the legal age of consent. We outline our supplementary evidence and recommendations below.

1. Impact of sexual portrayal of under-18s in advertising

1.1. The sexualisation of children in the media and its impact on their self-confidence

The Children's Society has listened to the voices of 52,000 children and young people in 36 locations across the country through local well-being assessments since 2012. The well-being consultations are designed to provide an assessment of well-being amongst children and young people between the ages of 8 and eighteen in a local area. Local well-being consultations present a unique insight into some experiences of children in schools and communities that may be shaping their subjective well-being and their relationship with peers.

Though we do not ask children and young people about advertisements directly, comments from children and young people are regularly captured relate to CAP and BCAP's areas of examination, particularly around gender stereotypes and associated behaviours and expectations.

It is clear that advertisements and other forms of media have a real influence on the lives of young people. This is particularly true of secondary age girls who make links between the portrayal of girls and women in the media and the way they feel about themselves. Through our consultations, girls told us that they felt under pressure to adhere to a specific idea of what it means to be female, an idea which focuses strongly upon physical appearance. Teenage girls also comment upon the expectations others have upon them, particularly boys, which many identify as being unrealistic and shaped by images in the media.

"The way we dress is all to do with society and there is too much pressure on girls to look good all the time and to keep up with the fashion." - Girl year 10

"Girls are less happy with their appearance (compared to boys) because how the media portray how girls are supposed to look." - Girl year 10

"There are high expectations (on girls) due to media and famous women." - Girl year 10

"Girls are generally more self-conscious about their appearance as they get older this is because of models in mags and names." - Girl year 8

"Girls are more self conscious because they don't look like all the girls in magazines so boys think they're ugly because we're not all the same." - Girl year 8

"Girls generally feel more pressured. Social media and media in general have changed the way girls think about themselves. Comments from boys don't make it easier because they don't see a super model." - Girl year 8

“Girls are more self-conscious when they go to high school because of the expectations, boys and girls talking about you, magazines with fit girls in it and then look at me and us. Boys will think you should be perfect or get called a fat slag.” - Girl year 8

“Pictures and adverts in magazines – they all look perfect.” - Secondary age girl.

“If celebrities or people we look up to started to look natural we would consider that.” - Secondary age girl.

These findings are reinforced by our national well-being research that has shown that almost one-third of young girls (28 per cent) in England are unhappy with their appearance³. Girls in England rank bottom in terms of happiness with their body, appearance and self-confidence compared to all of the 15 countries we surveyed – except South Korea.

▪ **The risks associated with the sexualisation of children in the media**

Not only do sexualised forms of media, including advertisements, expose children to inappropriate sexual behaviours and expectations but they can often depict an unhealthy representation of sex and relationships. The sexualisation of children blurs the boundaries between childhood and adulthood and leaving children vulnerable to exploitation and can influence them to explore unhealthy relationships.

Young people have told us that they feel pressured to keep up with the latest trends and cultures both online and offline, which can diminish their self-esteem and lead children to engage with adult content and websites intended for adults, such as dating sites or chat rooms.

1.2. The inclusion of 16 and 17 year olds in rules pertaining to the sexualisation of children

Welcome the inclusion of 16 and 17 years in revisions made to CAP rule 4.6 and BCAP rule 4.4.

Our [Seriously Awkward campaign](#) reveals that because of their age, the most vulnerable 16 and 17 year olds are falling through the cracks of childhood and adulthood. They are being let down by the law and not getting the same basic protections as younger children to keep them safe.

Article 1 of the UNCRC recognises someone as being a child until the age of 18 and The Children Act 1989 defines a child as anyone who is under the age of 18 and recognises that children who are 16+ are as vulnerable to abuse and neglect as younger children. Despite the legislation being clear about this, too many Government policies currently assume a person's rights as a child stop on their 16th birthday. This makes it much harder to protect 16-17 year olds from harm and cruelty and sends a message that they do not require the same protection as younger children.

▪ **16 and 17 year olds experiencing or at risk of sexual offences**

Our research has shown that whilst this age group are at high risk of being a victim of a sexual offence very few of these young people see the perpetrators of those crimes brought to justice⁴. Many young people of this age are coerced into sexual acts through fear, drugs and alcohol or other imbalances of power, with the most vulnerable, including children in care, being particularly at risk.

The true scale of sexual offending against 16 and 17 year olds is not understood and is not presented in national and local statistics. With the exception of some sexual offences that cover 16 and 17 year olds in the same way as children under the age of 16 data on most sexual offences against children aged 16 and 17 is subsumed within the general adult sexual offending statistics.

Our *Old Enough to Know Better?*⁵ report found that females aged 16 and 17 are at the highest risk of becoming a victim of a sexual offence in comparison to older age groups with 8.6% saying that they had been a victim of a sexual offence over the last 12 months.

1.3. The impact of sexualised violence in adverts on children

In addition to reviewing the sexualisation of children and young people in ads, CAP and BCAP should examine the portrayal of violence and sexualised violence in adverts and its impact on children. In our well-being work, we recognise increased levels of violence in schools, whilst this has not been directly attributed to ads; we are concerned about their harmful impact.

Our local well-being consultations show that girls and boys experience different pressures and expectations. The pressures and expectations experienced by girls are not always seen, heard and understood. The transition from primary to secondary school creates a greater drop in well-being for girls than boys and a key factor in that experience is a decline in happiness with appearance, and the pervasive and demanding expectations placed on girls.

Young people today are exposed to an unprecedented level of both sexualised and violent media content. Extensive studies have demonstrated that violent depictions in the media has an association on young people's aggressive and violent behaviour⁶. Researchers also suggest that, by encouraging male viewers to internalise the notion of women as sexual objects, adverts create a hierarchy within which women are viewed as subordinate and, therefore, as appropriate targets for sexual violence⁷.

Recommendation:

- *CAP and BCAP should review the use of violence including sexualised violence in advertising.*

1.4. Regulations around who features in ads

We welcome BCAP's recognition that, indirect marketing for gambling advertisements may be potentially damaging to children and young people. BCAP code 17⁸ regulates the advertising of gambling, stating that: 'gambling advertisements are socially responsible, with particular regard to the need to protect under-18s and other vulnerable persons from being harmed or exploited'. This guidance prevents the use of advertising techniques such as the use of cartoon or licensed characters that appeal to children or young people, especially by reflecting or being associated with youth culture and the use of celebrity endorsement. These rules are similar for advertisements that promote alcohol and foods that contain high levels of fat, sugar and salt.

Whilst we welcome the review of the sexualisation of children and young people in advertising, we urge the Committees to scrutinise the way in which celebrities synonymous with youth culture are used within ads across the board.

We believe that children and young people should be protected from all forms of exposure to inappropriate and sexualised advertising irrespective of the perceived level of harm associated with the product being promoted. Celebrities who are highly regarded within youth culture are frequently used to promote products across the media and Internet, often in highly sexualised and unrealistic ways.

Justin Bieber's, Calvin Klein⁹ ad campaign features the celebrity, idolised by many children and young people, in a suggestive and arguably unrealistic way. Whilst we are not proposing that Bieber is portrayed as under the age of 18, we are concerned that a use of celebrities so highly regarded by many children and young people in ways such as these may have negative ramifications on the way in which they view themselves and their bodies.

The Children's Society believes that the inclusion of celebrities who have a strong youth following risks normalising behaviours and beliefs around body image that may be harmful to them throughout their life trajectory.

Recommendations:

- *We believe that children and young people should be protected from all forms of exposure to inappropriate and sexualised advertising irrespective of the perceived level of harm associated with*

the product being promoted. We believe that from conception, all ads shown before watershed should go through a child impact assessments. The assessment should consider any harm that may arise from a child or young person being exposed to its content.

- *Whilst we welcome the review of the sexualisation of children and young people in advertising, we urge the Committees to scrutinise the way in which celebrities synonymous with youth culture are used within ads across the board.*
- *Recommendation on scheduling and content of all ads with sexual imagery*

2.1. Outreach and training by regulators

As previously mentioned we are concerned that children and young people are being prematurely sexualised by media and online culture and that this is having a negative impact on their well-being. We believe that this is not being well recognised or acknowledged. Additionally, we feel that children are not receiving appropriate education and guidance to best equip them to deal with any negative emotions that exposure to these types of adverts may give rise to.

The British Board of Film Classification (BBFC) have developed an educational resource¹⁰ aimed at children and young people. Their resource provides detailed and transparent guidelines on the way in which they reach their classification decisions. This resource provides the opportunity for children and young people to understand the decision-making processes involved in film classifications which may better equip them to think critically about the content of films that they are exposed to.

We recommend that BCAP and CAP develop an educational programme to work with schools and others working with children and young people make clear to children and young people how judgements are made over which ads are considered appropriate and which are not. We feel there is a need for training materials that help teachers and others working with young people to convey to children and young people that adverts are not always a statement of fact and that do not always reflect reality. Research suggests that many young children are unaware of the intent of advertisements and therefore more susceptible to being misled by their messages¹¹. We believe that this resource may help enable autonomous and critical thinking by providing greater insight into the aims and objectives of advertising across media.

The Children's Society is of the view that schools can play a vital role in promoting safe and healthy attitudes towards body image and that well structured Personal, Social and Health Education (PSHE) can be a positive step towards improving the school experience for all pupils. In order to achieve this aim we believe that PSHE should include a topic about body image and should support children in evaluating critically the images they see and understand the nature of advertising. We want CAP and BCAP to produce materials that can be used in these lessons to better inform students about the techniques used in ads and the ways in which their content may differ from a healthy reality. The PSHE curriculum should be made statutory to ensure that all children have access to appropriate good quality education on the subject of body image and well-being.

Our Good Childhood Report 2015 found that England ranked bottom for a number of aspects of children's well-being, including those relating to school life, bullying and, especially for teenage girls, their sense of self-image, compared with the 14 countries involved in the international study on children's wellbeing.¹² The 2016 'Good Childhood' report found that one in seven girls are not happy with their bodies.¹³

'Because the girls feel pressured by the boys that they should look a particular way and that leads girls into depression or low self-esteem and makes girls feel ugly or worthless.' - **Secondary Age Girl**

We believe that The Committees of Advertising Practice should endorse The Children's Society's recommendation that alongside PSHE sessions, schools should be required to provide counselling provision for their students. We believe this would ensure young people are offered the opportunity to

discuss issues such as sex and body image in a private space in which they feel comfortable to voice concerns which may have been brought out by exposure to highly sexualised media and consumer culture.

Recommendations:

- *We recommend that BCAP and CAP develop an educational programme to work with schools and others working with children and young people make clear to young people how judgements are made over which ads are considered appropriate and which are not.*
- *PSHE should include a topic about body image and should support children in evaluating critically the images they see and understand the nature of advertising.*
- *The PSHE curriculum should be made statutory to ensure that all children have access to appropriate good quality education on the subject of body image and well-being.*

2.2. Strengthening national guidance to tackle sexualisation of children in the media

We believe that to effectively clamp down on the sexualisation of children in the media, regulatory bodies need to respond uniformly and consistently. Regulators should also have a common understanding of the impact sexualisation of children in the media has on different age groups of children and on adults.

It is clear that updated national guidance is required to establish and define what is and is not acceptable in the media, including in advertising. This will promote a shared understanding between all media regulators including in definitions and examples set out in their respective guidelines.

Recommendation:

- *The Committees of Advertising Practice should share the learning and outcomes of this consultation with The Department for Culture Media and Sport. This should help inform guidance on the sexualisation of children and young people in media to ensure there is a shared understanding and definition between media regulators of what constitutes materials which may be inappropriate and harmful.*

Contact information:

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