

Online Consultation on Body Image

Introduction

The Hon Kate Ellis MP, Minister for Youth, is developing a strategy to address the issue of negative body image and the effects this is having on young people. This online consultation seeks your ideas and views about what can be done to address the problem of negative body image.

The consultation is divided into four main sections that seek your views on key parts of the development of the strategy. People will have the option to answer only the questions they are interested in.

The estimated completion time is indicated next to each section below.

Part 1 asks what the issues are that should be included as part of 'body image' (2 mins)

- *Consultation point 1:* What should be included as part of body image?

Part 2 asks how we can increase the capacity and resilience of individuals. (8 mins)

- *Consultation point 2:* How can we increase the capacity and resilience of individuals to deal with and respond to body dissatisfaction, and to help them to be supported in this by their immediate social environment?

Part 3 asks how we can change the messages given by our culture about what is beautiful and promote a framework which encourages the promotion of a healthy body image, including through a Code of Conduct (15 mins)

- *Consultation point 3:* How can we achieve cultural change on this issue?
- *Consultation point 4:* What should a Code of Conduct look like?
- *Consultation point 5:* What issues should a code cover?
- *Consultation point 6:* Working with industry
- *Consultation point 7:* How can the code be effective?

Part 4 provides an opportunity to share your story and thoughts on the issue, or outline any concerns you have about any element of the strategy that is not otherwise covered in parts one and two. (5 mins)

- *Consultation point 8:* What are the new and emerging technologies that are likely to pose a problem to people's body image?
- *Consultation point 9:* Anything else?

If you would like to complete the whole consultation, depending on your input it should take about 30 minutes

What will happen to your submission?

A summary of the key points made throughout submissions will be made available at www.youth.gov.au/ayf. As part of this summary, and the development of the strategy more generally, the Department may quote or reference your submission anonymously.

Submissions will not be made public without express consent. Once information has been made available to the general public the Department has no control over how the information will be disseminated.

The Department, its contractors and agents are bound, in administering the Online Consultation on Body Image, by the provisions of the Privacy Act 1988, which prevents personal information from being disclosed without appropriate consent, unless the disclosure is required or authorised by law. Section 14 of the Privacy Act contains the Information Privacy Principles (IPPs) which prescribe the rules for handling personal information.

The Privacy Act 1988

The Department must abide by the IPPs and the Privacy Act when handling personal information collected or created for the purposes of administering the Online Consultation on Body Image - Content. In brief, the Department must ensure that:

- a) personal information is collected in accordance with IPPs 1-3;
- b) suitable storage arrangements, including appropriate filing procedures are in place;
- c) suitable security arrangements exist for all records containing personal information;
- d) access to a person's own personal information held by the record-keeper is made available to the person at no charge (unless the record-keeper is required or authorised by law to refuse to provide access to the person);
- e) records are accurate, up-to-date, complete and not misleading;
- f) where a person requests that a record be amended because it is inaccurate but the record is found to be accurate, the details of the request for amendment are noted on record;
- g) the personal information is only to be used for the purposes for which it was collected, and for other purposes where expressly allowed by IPP 10; and
- h) personal information is only disclosed in accordance with IPP 11.

Uses of collected material

All information and material provided in submissions are accepted on the understanding that such information and material may only be used or disclosed:

- a) in the process of developing a strategy to address the issue of negative body image and the effects on young people;
- b) for the purposes of consultation with the Commonwealth, State and Territory Governments.

Any use or disclosure of this information and material by the Department, its contractors and agents will be in accordance with the Privacy Act 1988.

This information is about the person who is filling out the consultation paper. The personal information you provide is extremely helpful in evaluating the consultation process however the mandatory fields are marked with an asterix (*).

Name: __ **Scott McClellan** __

Age:*

State:*

City/Town: __ **Sydney** __

Occupation: __ **CEO** __

Could you please briefly outline your interest in body image: __

The Australian Association of National Advertisers (AANA) as the peak industry association represents the rights and responsibilities of companies and individuals involved in Australia's \$30 billion a year advertising, marketing and media industry. The AANA welcomes the opportunity to participate in the development of the policy and regulatory environment in which the advertising and marketing industry operates.

Are you happy for us to contact you about your submission in the future?*

If YES, please provide your email: __ **scott@aana.com.au** __

Would you like to be added to a list of people who are concerned about body image and receive further information at a later date?

Would you like to be added to a list of people who are concerned about youth issues and may be contacted about them by the Office for Youth?

If you are making this submission on behalf of a business or organisation, could you please tell us about the business or organisation

Your position within the business or organisation: __ **CEO** __

Name of business or organisation:

Australian Association of National Advertisers (AANA)

Industry within which your business or organisation operates (recommended)

Nature of business or organisation (recommended) ___

Industry representative organisation.

PART 1 – What does body image include?

Consultation point 1: What should be included as part of body image?

Body image is about what a person thinks and how they feel about and value their own body. It becomes problematic when people develop negative feelings about their body and these feelings impact on their general wellbeing and become a contributing factor in the development of serious psychological and physical concerns.

Perhaps the most common factor thought of when talking about body image is the size and shape of a person. The Strategy will certainly address these issues for males and females, but we are also interested in testing ideas about what else should be included under the broad heading of 'body image'.

Other issues that could be included are things that are appearance related and have the ability to affect how people feel about and value their bodies. The question below lists a number of these issues and we want to know if they should be part of a strategy addressing body image.

Question 1.1: What other aspects of appearance do you think should be considered as part of the governments efforts to address body image?

Ethnic diversity

Natural skin colour (skin that is not tanned and promotes sun-smart behaviour)

Religious diversity

Physical disabilities

Other, please list or describe;

Physical features generally – differences in features whether natural or caused by health status/accident eg scarring, hair loss etc; age/ageing; and body modification.

PART 2 – Addressing the personal and social causes of body dissatisfaction

Not addressed.

PART 3 – Achieving cultural change

Consultation point 3: How can we achieve cultural change on this issue?

Our current culture's representation of beauty provides a background that makes it more likely for people to become dissatisfied with their body. The media, fashion and advertising industries all have an important role to play in influencing culture and the Government has committed to developing a code of conduct to help guide industry behaviour in this area.

However, the Government is also interested in hearing your views on other ways of influencing cultural ideals to encourage people to have a more positive body image.

Question 3.1: Apart from a voluntary Industry Code of Conduct on Body Image, how would you suggest cultural change around body image is achieved?

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AANA wishes to highlight that advertisers and marketers in Australia recognise their role and obligations as a socially responsible channel to influence cultural change. However, it must be recognised that Australian advertising is only a proportion of the full range of advertising/marketing material available and accessible to Australian consumers and which can be successfully controlled or influenced by government regulation, policies and guidance and industry self-regulatory measures and initiatives. Therefore, any actions taken by the Australian advertising and marketing industry must be considered in the context of a potentially restricted ability to influence cultural change.

AANA recommends that a broad range of initiatives be implemented over a sustained period of time in order to address the complexity of influences on body image. AANA notes that advertising and marketing is only one of these matters and one where the degree of influence differs when taking into account an individual's life-stage/s, gender, ethnicity, religion, physical and psychological status, cultural background and family/social environment. Recognising that on an individual level advertising may not be the determining influencing factor all the afore-mentioned matters and their potential weighting/s of influence must be considered and addressed in government initiatives on negative body image.

AANA notes the government in December 2008 committed to the development a voluntary National Media and Industry Code of Conduct on Body image which would consider the following matters:

- notification of Digital Alterations (in case of physical manipulation);
- a minimum age limit of 16 years for participation in adult fashion shows, magazine shoots and TV programs;
- commitment to diversification of body shape and size; and
- glamorisation of severely underweight models or celebrities.

AANA notes that various industry sectors have already taken some action in relation to all these matters and that government's have introduced legislation on others in response to community concerns eg NSW has lifted the age of models who need their guardian's permission to work from 15 to 16.

AANA's own self-regulatory mechanism, including the *Code of Ethics* and *Code for Advertising & Marketing Communications to Children* contain provisions relating to the portrayal of persons. The adjudicative mechanism is administered by the independent Advertising Standards Bureau provides an avenue for consumer complaints and a transparent complaint process.

Industry is an active partner in the development of a range of initiatives in recognition that a broad and cooperative community-wide approach is required to address these issues. AANA, for example, was pleased to contribute to the 2008 Victorian Government *Voluntary Media Code of Conduct on Body Image* for the advertising, media and fashion industries on this issue and 2004 *Gender Portrayal Guidelines, Keep it real. Keep it in context*. Both these documents are promoted throughout industry.

All the afore-mentioned initiatives are contributing to cultural change, however, in recognition that some of these initiatives have only been more recently implemented it is suggested that time is required before their longer term contribution (supported and actioned by the advertising and marketing sectors) to a significant cultural shift can be expected or assessed.

AANA considers that a National Code (or other form of singular resource) if developed will likely largely reflect current relevant regulations, industry initiatives, guides and industry code provisions. It could therefore be a useful single point of reference to 'best practice' in this area for example, referred to as a benchmark in determining complaints under industry codes (refer below).

AANA supports the continuation of education and awareness programs and advertising/marketing/media initiatives that are currently addressing the issue.

AANA highly recommends:

- **an increased focus on initiatives that would improve media literacy; and**
- **research to underpin developing policy and regulatory responses.**

AANA suggests that media literacy programs are delivered not only to younger people but also awareness activities tailored to a range of age groups. AANA recognises the importance of the need for improved media literacy to allow consumers to evaluate the images and messages they see, hear and read but also the individual's own obligations and responsibilities in relation to how they engage in on-line media and the impact this may have on others. The speed of developments, evolution and levels of engagement within on-line media are a fact of the communication world in which we all live. In relation to body image there is some evidence that enhanced media literacy can play a role in ameliorating adverse effects of advertising¹.

¹ Yuko Yamamiya et al. 2005. *Body Image 2*. Women's exposure to thin-and-beautiful media images: body image effects of media-ideal internalization. pp74–80

AANA suggests that further research is required into the influence of advertising on body image in a range of community circumstances. For example, AANA acknowledges the weight of research indicating that media images of thin women influence younger women's body image perceptions. However, there is evidence that other factors may be significant at an older age and in differing relationship situations².

Consultation point 4: What should a Code of Conduct look like?

A code of conduct generally provides guidelines about what is considered to be responsible behaviour. In this instance, the Code will provide guidelines for the media, advertising and fashion industries about how they can act responsibly when it comes to body image.

However, because different types of behaviours are relevant to different industries, we are interested in your ideas about how the code should be structured so that it is simple and easily understood, but still meaningful and able to cover all the appropriate issues.

There are a range of different ways to structure the voluntary National Body Image Code of Conduct that will enable it to be applied across different industries. This discussion point seeks your ideas about which of five options is likely to be the most effective:

- Option 1.* One broad code that deals only with generic issues
- Option 2.* One code that deals with generic issues, but also has puts forward ideas that are specific to different industries
- Option 3.* A separate body image code for each industry that is covered
- Option 4.* Incorporate body image clauses within existing industry codes
- Option 5.* Other (do you have any other ideas)

Question 4.1: I think option: 4 would be most effective because...

Most if not all sectors in the advertising, marketing and media industries already have codes of conduct or ethics. As all industry codes are reviewed and revised regularly, and have complaints mechanisms in place, it is suggested that this would be the most effective option for addressing the issue.

As noted in part 6 of this document a government code initiative will not be enforceable. However, incorporation of body image provision into current industry codes would enable self-regulatory compliance and enforcement mechanisms. The advertising industry would welcome a government initiative to develop 'guidelines' or a 'protocol' as a publicly available reference resource. AANA considers this format would not be of any lesser standing for practical purposes than a non-legislatively underpinned code (in relation to enforcement), however, it would facilitate the adoption of consistent provisions within industry codes when adopting more detailed body image measures and provide reference criteria for determining complaints under adjudicative processes.

² M Pole et al. 2004. *Body Image* Volume 1, Issue 3, Body dissatisfaction in married women: The role of spousal influence and marital communication patterns. September 2004, Pp 267-278. Study noted that familial body-focused comments and spousal evaluation emerged as significant predictors of body dissatisfaction.

Consultation point 5: What issues should a code cover?

The guidelines in the Code need to be broad enough to be relevant for a range of different organisations, communication methods and business approaches. For example, the media industry alone is comprised of printed, online, radio and televised content. Content in the media ranges from news and current affairs, to soaps, to lifestyle and reality shows. This means that guidelines that relate to the media industry need to be able to make sense of a wide range of genres and communication channels.

The wording of the code is very important. The guidelines need to be described in ways that clearly respond to the issue, but still broad enough so that they can be identified with by different types of organisations.

Because the structure of the Code is also an issue on which the Government is seeking your views (see discussion point 3), this question asks you to list the generic issues that a code should cover, and specific issues that are relevant for each industry.

Question 5.1: The Minister has previously suggested the following guidelines will be considered for inclusion within the Code. Do you agree with these suggestions?

Clearer notification of altered or enhanced images, including digital alterations

Better representation of diverse body shapes and sizes

Appropriate industry age limits

Question 5.2: What are some other issues that you think are applicable to all industries and you would like to see covered in a body image code of conduct?

Question 5.3: What are the issues that you think are applicable to the media industry and that you would like to see covered in a body image code of conduct?

Question 5.4: What are the issues that you think are applicable to the advertising industry and that you would like to see covered in a body image code of conduct?

As noted above, industry is already engaged in applying better industry practices on this matter. AANA believes the issue of negative body image is not restricted to being a 'youth' issue but is an issue experienced by many individuals at any stage of life.

AANA's suggestion of a guide or protocol on the issue is considered an appropriate government response as information should be available in relation to the full range of matters that influence an individual's perceptions and behaviours about their body. Raised awareness of the shifting importance and level of influence of differing factors over a person's life-time should be understood. Being aware of this context may also assist youth in understanding the impact of influencing factors and that some may be temporary in relation to significance at a point or period in time.

Question 5.5: What are the issues that you think are applicable to the fashion industry and that you would like to see covered in a body image code of conduct?

Consultation point 6: Working with industry

Body image is a cultural issue and the media, fashion and advertising industries are some of the most powerful influencers of culture. The Government wants to work with industry to achieve cultural change around body image because this is the most effective way to balance the needs of industry with the need to provide a society which supports, equips and empowers young people to reach their full potential.

In practice, this means that Government will not be changing or introducing legislation to enforce the Code and participation by industry will be on a voluntary basis.

This consultation point provides opportunity for you share your ideas about how we can best work with industry to implement a Code of Conduct that is meaningful and effective.

Question 6.1: Where do you think industry is at when it comes to being concerned about the impact of, and its responsibilities towards, the promotion of positive body image messages?

As noted above the advertising industry has been, and is, responsive to this issue. AANA as the peak industry body is working with government on a range of contextual matters including portrayal of gender, sexualisation of children and use of images of children in online media in recognition of this sectors role in influencing and promoting cultural change in response to community concerns.

Question 6.2: Do you think industry will be receptive of a code of conduct? Do you have any other comments?

AANA is confident based on experience that industry is receptive to any guidance to assist them in the development of best industry practice.

Question 6.3: What are the major barriers to achieving industry acceptance of a code of conduct and how can these be overcome?

Any prescriptive or disincentive measures introduced that contribute to the ability of advertisers to not compete on a 'level playing field' in the market would not be acceptable to industry. As noted above an Australian code would not apply or influence all advertising and marketing communications directed to or accessible by Australian consumers.

Consultation point 7: How can the code be effective?

The Government has stated that the code will be voluntary. Best practice in has shown the most effective way of achieving cultural change is to partner with key stakeholders and encourage their corporate social responsibility. This includes highlighting best practice in the industry to demonstrate how positive body image behaviours also make good business sense.

However, some people have raised concern that a voluntary Code will 'lack teeth' and be dismissed by industry. This consultation point seeks ideas about how to ensure the voluntary Code is meaningful and relevant to industry.

As part of making the Code effective, we are asking if the Code needs to be monitored. We are also interested in how you think this could work.

Question 7.1: Do you think there should be incentives and/or disincentives associated with the Code?

If yes, what do you think these should be?

AANA does not support the application of disincentives with the proposed Code particularly as the enforceable option has not been adopted by government and recognising that current industry codes already provide sanction provisions for breaches. AANA believes that the proposed Code, if developed, must operate in partnership with other initiatives (as mentioned above) and not unintentionally undermine the ability of these to achieve successful outcomes.

Incentives are supported and consideration of awards and funding assistance to support implementation initiatives would be welcomed.

Question 7.2: Do you think that monitoring the Code will make it more meaningful?

If yes, how do you think this should work?

AANA suggests regular reporting on the status of 'cultural change' over time in the context of all initiatives addressing the issue of body image. Monitoring of the proposed code or outcomes of industry codes should be but one component of evaluating the success or otherwise of the government's initiative.

This suggestion recognises that the advertising, marketing, media and fashion industries are only a part of the story in relation to body image. Without providing context to the contribution of these sectors within the full range of initiatives operating to facilitate cultural change risks unrealistic expectations about what can be achieved by these sectors and potential unwarranted criticism.

Question 7.3: What else do you think could be done to make the Code meaningful?

PART 4 – Other

Consultation point 8: What are the new and emerging technologies that are likely to pose a problem to people's body image?

Some of the contributing causes of body dissatisfaction are not likely to change any time soon, for example it is likely that parents, friends and peers will continue to influence people's feelings about their own body for as long as we can imagine. However, changes in technology mean that there may be new ways through which harmful (or positive) body image messages are presented and communicated.

Similarly, some technologies or ideas might be having an effect now and have largely gone unnoticed, and may have a significant impact in the future. For example, the use of online avatars (figures that represent a person as a virtual body) and the implications this might have on body image is an issue that was discussed as part of the Queensland Government's Ideas Festival (http://www.ideasfestival.com.au/02_cal/details.asp?ID=87&varPeriod=1).

Question 8.1: What are the new and emerging technologies that are likely to have an impact on body image in the next 5, 10 or more years?

Consultation point 9: Anything else?

The first four parts of this paper have asked for your thoughts on key points about the introduction of a National Body Image Strategy and Code of Conduct. Many people will have thoughts or ideas that don't fit neatly under these headings, while other people may want to share their stories about how this issue has impacted on them, their friends or family.

Question 9.1: Do you have any other thoughts you would like to share?
