

1. Do you agree with CAP and BCAP's proposal to introduce a new rule and supporting guidance into the Advertising Codes? Please include relevant evidence to support your view, whether you agree or disagree with the proposals. *

Yes X

No

Please include evidence for your proposals

This is a joint response from End Violence Against Women (EVAW) (www.endviolenceagainstwomen.org.uk), Rape Crisis England and Wales (www.rapecrisis.org.uk), Imkaan (www.imkaan.org.uk) and Rape Crisis South London (www.rasasc.org.uk)

EVAW is a leading coalition of specialist women's support services, researchers, activists, survivors and NGOs working to end violence against women and girls in all its forms.

Rape Crisis England & Wales is a national charity and the umbrella body for our network of independent member Rape Crisis Centres.

Imkaan is a UK-based, Black feminist organisation and the only national second-tier women's organisation dedicated to addressing violence against Black and minoritised women and girls i.e. women and girls which are defined in policy terms as Black and 'Minority Ethnic' (BME).

Rape Crisis South London is an independent organisation and member centre of RCEW and EVAW, providing specialist support to female survivors of sexual violence aged 5 and over. Working from a model of empowerment we are dedicated to the healing of survivors of sexual violence and eradicating all forms of violence against women and girls.

As organisations working in the Violence Against Women and Girls (VAWG) sector, we know that societal attitudes including belief in and the propagation of stereotypes can have a catastrophic impact on the daily experiences of women and girls. Use of stereotypes in advertising act to further normalise and reinforce negative social attitudes and existing gender inequality which is both a cause and consequence of VAWG, they therefore disproportionately effect women and girls.

44% of UK women say that advertising makes them think they're not good enough [sUM London – 'Women in Ad'](http://umww.co.uk/news/2017/07/three-quarters-of-uk-women-say-they-are-stereotyped-in-adverts) (<http://umww.co.uk/news/2017/07/three-quarters-of-uk-women-say-they-are-stereotyped-in-adverts>),

"The overwhelming message that girls and young women are sending us in this year's survey is that they live in a world where sexism and gender stereotypes are entrenched in all areas of their lives. From a young age, girls sense they face different expectations compared to boys and feel a pressure to adjust their behaviour accordingly. Girls encounter stereotyping across their lives – at school, in the media and in advertising, in the real and the virtual world, from their peers, teachers and families." Girls Attitudes Survey 2017 –Girlguiding (<https://www.girlguiding.org.uk/globalassets/docs-and-resources/research-and-campaigns/girls-attitudes-survey-2017.pdf>)

- 42% of girls 11-24 said they had seen adverts they classified as sexist in the previous week.

- 47% of girls ages 11-21 had seen stereotypical images of men and women in the media in the past week that made them feel less confident to do what they want.
- 95% of girls aged 11-21 said the advertising industry should show more positive diverse representation of girls and women.
- 30% of girls aged 11 to 16 think computing is more for boys.
- 37% of girls aged 11 to 21 say their confidence would be better if there were no gender stereotypes.

Girls Attitudes Survey 2017 –Girlguiding (<https://www.girlguiding.org.uk/globalassets/docs-and-resources/research-and-campaigns/girls-attitudes-survey-2017.pdf>)

2. Do you agree with the wording of the proposed new CAP and BCAP rules? If not please include suggestions for how the proposed rules could be improved to achieve the aims set out in this consultation. *

- Yes
- No X

Please include your suggestions. *

Any stereotype is likely to cause harm, so a better rule would be not to use them at all and to challenge them as ethical best practice. Please refer to other questions for examples of how these rules and guidance could be strengthened.

3. Do you consider the draft guidance to be clear and practicable? If not, please include suggestions for how it could be improved to achieve the aims set out in this consultation. *

- Yes
- No x

Please include suggested improvements. *

We would like to see better contextualising of how gender stereotypes reinforce and reproduce gender inequality which is a 'harm'.

Ads aimed at one gender

One of the three caveats around the guidance is 'you can still feature ads which are aimed at one gender where the product is developed and aimed at one gender'. This could use some clarification as many products that are essentially genderless are aimed at one gender. The Campaign Let Toys be Toys (<http://lettoysbetoys.org.uk/>) has worked solidly on this issue for many years. In their 2015 research *Who gets to play? What do toy ads on UK TV tell children about boys' and girls' play?* December 2015 (<http://lettoysbetoys.org.uk/wp-content/uploads/2015/12/LetToysBeToys-Advertising-Report-Dec15.pdf>) looking at advertising they found that:

- Boys were shown as active and aggressive, and the language used in adverts targeted at them emphasises control, power and conflict. Not one advert for baby or fashion dolls included a boy.
- Girls were generally shown as passive, unless they were dancing. The language used in the ads focuses on fantasy, beauty and relationships. Out of 25 ads for toy vehicles, only one included a girl.
- Ads targeted at boys were mainly for toys such as vehicles, action figures, construction sets and toy weapons, while those targeted at girls were predominantly for dolls, glamour and grooming, with an overwhelming emphasis on appearance, performing, nurturing and relationships.

These toys are not inherently gendered, they are just toys. Such gendered advertising harms children by limiting them to stereotypical gendered behaviour and punishing those who do not conform to these rigid ideas. More specific examples in the guidance could include that larger groups of children in toy advertisements should feature boys and girls (mixed groups) and that ads should not explicitly or strongly imply that a particular children's product, pursuit, activity, including choice of play or career, is inappropriate for one or another gender.

Intersecting Stereotypes

On page 4 of the guidance you state that:

'The use of other stereotypes can compound the effect of gender stereotypes and increase the likelihood of harm and/or offence being caused by the depiction of gender stereotypes. Stereotypes associated with gender can include gender reassignment and sexual orientation; other stereotypes can include those relating to age, disability, race, religion, beliefs, marriage, civil partnership, pregnancy or maternity.'

However, the guidance does not explicitly explore this in any of the examples, this approach should be woven throughout the guidance.

Stereotypes such as those based on age, disability, race etc as well as sexuality interlock with gender stereotypes meaning that gender stereotypes themselves are not fixed. The guidance needs recognition of how, for example, stereotypes of older women differ from those associated with girls, and black and minoritised ethnic women are stereotyped in a different way to white women.

An example of stereotypes interacting, could be as in an image of some packaging we found for a baby sling. The product had 2 types of packaging one which featured a solo black women wearing a baby in a sling and another (for the same product) showing an image of a white hetero-normative family unit where the woman is carrying a baby in the sling (see uploaded PDF version). This product imagery covers a number of interacting stereotypes, women as nurturing, black single mums and heteronormative family units. This is only obvious when the 2 types of packaging are next to each other. i.e. the solo black women and baby juxtaposed next to the white 'family unit'.



Idealised Bodies

At times the guidance appears contradictory in that its aim is to prevent gender stereotyping as it's harmful, yet the 'guiding principles' on each page tend to also say it's okay to show some of these stereotypes, particularly around 'idealised bodies'.

It is well researched that advertising which pushes women and girls to conform to a body type causes in some cases severe mental health issues. Increases in diagnosis of eating disorders over time have been well publicised. Additionally, as shown in the statistics quoted above in question 1, many women and girls feel inadequate upon seeing these images.

The recent research by Level Up (www.welevelup.org) demonstrates that the context of advertising is also important. Level Up surveyed 4000 adult viewers of Love Island about their responses to the show, of those 250 were women aged 18-34. 40% of women said the show made them feel more self-conscious of their bodies. Level Up have been publicly critical of the advertisements that appeared around the show when it was aired calling ITV irresponsible for selling advertising space to cosmetic surgery and diet companies, it is probably no wonder that they also highlighted that 30% of millennial women have considered going on a diet to lose weight, while 11% have thought about getting lip fillers after watching Love Island.

A Better Approach

The approach in the guideline is very much what not to do but given that it is accepted that use of stereotypes causes harm (see for example DFID's (2016) work on the role of traditional gender norms in maintaining a culture supportive of violence against women (https://www.oecd.org/dac/gender-development/VAWG%20HELPDESK_DFID%20GUIDANCE%20NOTE_SOCIAL%20NORMS_JAN%202016.pdf)) might it not be better to frame the guidance in way which actively promotes challenging gender norms as ethical practice/social responsibility to promote equality.

We would prefer that the phrase 'vulnerable groups' be reframed to inequality or marginalised. Groups are made vulnerable through the unequal distribution of power in society, not by virtue of their own characteristics.

It would be helpful if the section around 'scenarios featuring people who don't conform to a gender stereotype' could be clearly linked to the harassment and violence people experience from others, particularly in public spaces and linked to people's specific experiences.

Training

As specialist women's organisations, we would be happy to deliver training for advertisers to implement these guidelines, we would be very well placed to do so and could ensure that the guidelines are framed around the harms that these stereotypes cause.