

General Scheme of the Online Safety and Media Regulation Bill

Submission on behalf of

Bodywhys: The Eating Disorders Association of Ireland

Bodywhys

PO Box 105

Blackrock

Co. Dublin

01-2834963

communications@bodywhys.ie

www.bodywhys.ie

© Think Bodywhys CLG 2021

Introduction

Bodywhys - The Eating Disorders Association of Ireland - is the national voluntary organisation supporting people affected by eating disorders. Our core work includes the provision of a range of support services and information resources about eating disorders, to the promotion of positive body image and media awareness in schools, as well as supporting family members and friends. According to the Health Service Executive's (HSE), Model of Care for Eating Disorders:¹

- Based on epidemiological projections, an estimated 188,895 people in Ireland will experience an eating disorder at some point in their lives.
- It is estimated that approximately 1,757 new cases occur in Ireland each year in the 10-49 age group.

According to University of Oxford's *Our World in Data*, figures from 2017 indicate that an estimated 16 million people worldwide have anorexia nervosa and bulimia nervosa.² Recent data published in the *Lancet Psychiatry* estimates that there are approximately 17.3 million with binge eating disorder, whilst 24.6 million are affected by Other Specified Feeding or Eating Disorder (OSFED).³

Background

Bodywhys welcomes the opportunity to respond to the General Scheme of the Online Safety and Media Regulation Bill. Within the area of eating disorders, there is a long history of so-called pro-anorexia ('pro-ana') material, dating back to the early days of the internet, before social media. The challenges associated with this are well-documented in the research literature. In the Irish context, exposure to such

¹ Health Service Executive (2018) Eating Disorder Services: Model of Care for Ireland. Dublin: Health Service Executive

² Ritchie, H. & Roser, M. (2018) *Our World in Data, Eating Disorders*. Accessed 08 March 2021. Available from <https://ourworldindata.org/mental-health#eating-disorders>

³ Santomauro, D.F., Melen, S., Mitchison, D. Vos, T., Whiteford, H., Ferrari, A.J. (2021) The hidden burden of eating disorders: an extension of estimates from the Global Burden of Disease Study 2019. *Lancet Psychiatry*, [https://doi.org/10.1016/S2215-0366\(21\)00040-7](https://doi.org/10.1016/S2215-0366(21)00040-7)

material has been documented by projects such as *EU Kids Online*.^{4,5} In the interest of brevity, we will not revisit details of specific concerns arising from such material. In 2014 and 2019, Bodywhys completed public submissions about online safety and harmful online content, both of which can be accessed via <https://www.bodywhys.ie/media-research/public-submissions/>. In recent years, Bodywhys has responded to queries from staff working in Facebook, Twitter and TikTok. These conversations have been productive and useful and allowed Bodywhys to share its views on safety, responses to harmful online content and considerations for relevant signposting. In 2020, Bodywhys also met with the Broadcasting Authority of Ireland (BAI), to discuss online harms.

Whilst there is much criticism of social media in public discourse, it is important to remember that it is a tool for expression, and in an eating disorder context, something that people may use during their recovery.⁶ Social media has also been useful for people to get support from, and stay in touch with, eating disorder communities during the Coronavirus (Covid-19) pandemic.⁷ It is therefore, a delicate balancing act – to monitor posts and content which contain personal stories that may have some frank, personal and graphic aspects, but which are not intended to promote risky behaviours. Those who post should be free to do so without feeling that their story is going to be removed due to potential misinterpretation or a heavy-

⁴ O'Neill, B., Grehan, S., Ólafsson, K. (2011) *Risks and safety for children on the internet: the Ireland report*. LSE, London: EU Kids Online.

⁵ O'Neill, B. & Dinh, T. (2014) *Net Children Go Mobile: Initial findings from Ireland*. Dublin: Dublin Institute of Technology.

⁶ Bohrer, B.K., Foye, U. & Jewell, T. (2020) Recovery as a process: Exploring definitions of recovery in the context of eating-disorder-related social media forums. *International Journal of Eating Disorders*, 53(8), 1219-1223.

⁷ Branley-Bell, D. & Talbot, C.V. (2020) Exploring the impact of the COVID-19 pandemic and UK lockdown on individuals with experience of eating disorders. *Journal of Eating Disorders* 8(1), doi: 10.1186/s40337-020-00319-y

handed response. Posts which clearly encourage specific eating disorder behaviours pose a risk and therefore warrant scrutiny. This is however potentially easier said than done, depending on where the images or content is hosted.

Submission focus

i) Application of the content levy

Bodywhys agrees that the implementation of a levy may be a useful mechanism to in order ensure that the responsibility to address online safety is taken seriously, or as a response in the event that appropriate action is not taken.

ii) Protection of children across online services and platforms

Core support services provided Bodywhys are delivered by trained volunteers. Volunteers undertake training, they are required to undergo Garda vetting and engage in supervision. Bodywhys provides information, support and understanding and not therapeutic services. All support services provided by Bodywhys are confidential, but delivered within the limits of the organisation's child protection policy. Bodywhys provides online support groups for adults (age 19+) and young people (13-18 years of age). On average, Bodywhys provides 100-104 online support groups per year. Bodywhys online support groups work on text-based chat (no video, or audio). Users register with a username using their email address, their age, gender and type of eating disorder.

Support groups, including online support groups can play a useful role in recovery and connecting with others.⁸ Bodywhys provides a pro-recovery space where users can talk about their experiences of an eating disorder or other aspects of their lives. Ground rules are posted by the volunteer facilitators who guide the discussion. Users cannot privately message each other or share personal details within the groups

⁸ McNamara, N. & Parsons, H. (2016) "Everyone here wants everyone else to get better": The role of social identity in eating disorder recovery. *British Journal of Social Psychology*, 55(4), 662-680.

provide by Bodywhys. If the facilitators are concerned about the welfare of a service user, they alert their supervisor. Bodywhys has a duty of care regarding the safeguarding of vulnerable individuals. It is the experience of Bodywhys that online support services can be a beneficial outlet for people who need support whilst experiencing a mental illness. Key to this however is that services are easy to access and use, clear in their objectives and appropriate monitoring and supervision is put in place.

In relation to protecting children online, it must be easy for children to report and block problematic material. Reporting tools should be user friendly. Understandably, people sometimes fear reporting things they are uncomfortable about, the more that can be done to remove this fear, the better it is for the user. If a child feels they want to move from talking to someone online to meeting in person, they should be encouraged to proceed with caution, that they not go alone, meet in a public place and to limit how much personal details they share about themselves. Training personnel who work or volunteer with children online is essential, as is supervision. The more informed staff and volunteers are the better prepared they can be to respond.

- In Ireland, the website www.webwise.ie is an excellent resource for young people, parents and teachers.
- Increased awareness of www.hotline.ie would be useful as a point of contact for reporting child sexual abuse content. Alerting parents to the warning signs of grooming may also be beneficial.
- The European strategy *The Better Internet for Kids Policy Map* is a valuable resource that may be useful for policymakers and legislators.⁹

⁹ O'Neill, B., Dinh, T. (2018). *The Better Internet for Kids Policy Map: Implementing the European Strategy for a Better Internet for Children in European Member States*. Brussels: European Commission, European Schoolnet and EU Kids Online.

End of submission.