



Online Safety Code

Submission to Coimisiún na Meán

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About Bodywhys

Founded in 1995, Bodywhys – The Eating Disorders Association of Ireland - is the national voluntary organisation supporting people affected by eating disorders and their families. Bodywhys provides a range of non-judgemental listening, information and support services, professional training, literature, podcasts and webinars. Other aspects of the organisation's work include developing professional resources and collaborating with social media companies to respond to harmful online content and working with the mainstream media to create awareness about eating disorders. Bodywhys develops evidence-based programmes to promote positive body image and social media literacy in children and adolescents, as well as school talks and educational resources. Bodywhys is the support partner to the HSE's National Clinical Programme for Eating Disorders (NCP-ED), which delivers specialist public services in the Republic of Ireland.

Current submission

Bodywhys welcomes the opportunity to further address the issue of online safety, following our earlier submission to Coimisiún na Meán in September 2023.¹ We welcome that the Code will be binding, prioritise user safety and increase accountability.

Social media, online harms and eating disorders

We previously outlined some of the harmful effects of pro-anorexia material and social media in our 2023 submission. In the current document, we wish to note additional evidence-based concerns. Pro-anorexia coaches have been documented as targeting vulnerable people with eating disorders, including seeking sexualised communication comparable to online grooming.² For users, pro-eating disorder online spaces can be a means of facilitating their eating disorder practices, such as food intake, exercise, lowest weight and current weight.³ Viewing fast-food advertisements, clean eating content and eating videos may be associated with disordered eating and body image concerns.⁴ Other potential effects include social comparison, internalisation of thin and fit ideals, self-objectification, which, in combination with other factors,

create what's been described as a self-perpetuating cycle of risk.⁵ Fitness related accounts may promote unrealistic and unhealthy body shapes, sexualisation and objectification.⁶ Content moderation through technical efforts aimed at addressing problematic hashtags, or hiding 'likes' does not resolve long-established issues on social media.⁷ Content moderation of pro-eating disorder (pro-ED) material is challenging. Users are often aware of potential steps to counteract and remove such posts, with some account profile biographies disavowing pro-ED identities and practices, whilst also communicating in a way that they can be found and read by like-minded peers.⁸

Responses to Consultation questions

Question 2

We agree that user-generated content is indissociable from user-generated video and that video-sharing platform services (VSPS) must take action to prevent and reduce harm as required by the Online Safety Code.

Question 3

The definitions provided are useful and highlight a range of risks and behaviours which may cause significant harm to children.

Concerns about the impact of social media are not solely confined to a potential impact on mental health. For example, a recent European report focused on the implications for child development, such as increased aggression, risky and unhealthy behaviours and that algorithm-based recommendation contribute to risk towards children.⁹ This report noted that children routinely encounter harmful content, they may be at risk of extortion, harassment, exploitation, cyberbullying and that their values and attitudes may become distorted. The report further observed that whilst children may feel quite confident in managing risks online, they do not always have good awareness of risk or coping strategies for unfamiliar situations.

We wish to comment on the reference to feeding disorders in the Code. Feeding disorders, such as impaired oral intake, or issues which delay

feeding milestones, difficulty in transitioning food/liquids from the mouth to the oesophagus, are distinct from eating disorders. Feeding disorders do not feature some of the core eating disorder psychopathology, such as low body image, a drive for thinness, drive for muscularity, fear of weight gain, fear of being at a healthy weight, bingeing, purging and over-valuation (sic) of shape and weight and a risky use of physical exercise. Currently, there is no in-depth literature base indicative of the promotion of feeding disorders as a form of online harms. Nor has the encouragement of feeding disorders in the online space emerged as a public concern. Therefore, it may be challenging for VSPS and Coimisiún na Meán to specifically determine what is representative of the harmful promotion of feeding disorders.

Questions 6 and 7

We agree that VSPS must identify what's prohibited in their terms and conditions and that they must also highlight the potential suspension and termination of accounts. Transparency and clear language in terms and conditions are essential. Whilst not without potential limitations as a strategy, the suspension or termination of accounts may be a protective approach to eliminating and reducing the impact and sharing of harmful content. Given the speed and availability of the internet, and online word-of-mouth, concern can arise not just how and where harmful content is originally created, but that it may lead to others replicating, or encouraging a risky behaviour, or that it may increase pressure on individuals.

Question 8

We welcome the reporting and flagging requirements in the draft Code. We hope that this will benefit users, improve transparency and outcomes and experiences of the reporting process. The information provided on page 51-52 is useful. We welcome that VSPS will have to meet targets and timelines.

Question 12

Welcome that the Code outlines how VSPS must respond to complaints. Informing users about how decisions are made, and which policies are applied is essential.

Question 18

The European report we cited in response to question 3 notes that children may have gaps in their media literacy skills that may ordinarily protect against disinformation. This report helpfully highlights where media literacy sits at a European level, and it includes evidence that social media literacy can protect against the impact of consuming idealised body-related content.¹⁰ Adopted in May 2022, the European strategy for a better internet for kids (BIK+) highlights how media literacy and critical thinking can help children and young people to safely navigate the digital environment and to make informed choices.¹¹ Concerningly, recent coverage from BBC News focused on children as young as 8 using skincare products after seeing them on social media.¹² It is essential that media literacy strategies are further developed without delay. We look forward to Coimisiún na Meán sharing its work in the future.

As noted in the European report: *The influence of social media on the development of children and young people*

‘Children encounter issues such as unfair practices, clickbait strategies, and hidden marketing practices that contravene their rights and which are not in their best interests. Research shows that children are often ill-prepared with low levels of awareness of commercial practices and lack the critical skills to disaggregate marketing content in the context of their experience of social media.’

Question 19

We agree with the Code that children's personal data must not be processed for commercial purposes. Apart from ethical principles, this is critical given the social, intellectual, and cognitive differences between children and adults.

Question 20

The language used to describe the handling of complaints in the Consultation document is clear.

End of submission

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- ¹ Coimisiún na Meán (2023) *Responses to Coimisiún na Meán call for inputs: Online Safety Code*. Dublin: Coimisiún na Meán.
- ² Simons, E.I., Noteboom, F., van. Furth, E.F. (2023) Pro-anorexia coaches prey on individuals with eating disorders. *International Journal Eating Disorders*, doi: 10.1002/eat.24074.
- ³ Amanda K. Greene & Lisa M. Brownstone (2023) "Just a place to keep track of myself": eating disorders, social media, and the quantified self. *Feminist Media Studies*, 23(2), 508-524.
- ⁴ Wu, Y., Kemps, E., Prichard, I. (2023) Digging into digital buffets: A systematic review of eating-related social media content and its relationship with body image and eating behaviours. *Body Image*, 48:101650.
- ⁵ Dane, A. Bhatia, K. (2023) The social media diet: A scoping review to investigate the association between social media, body image and eating disorders amongst young people. *PLOS Glob Public Health*. 2023 3(3), e0001091.
- ⁶ Curtis, R.G., Prichard, I., Gosse, G. *et al.* (2023) Hashtag fitspiration: credibility screening and content analysis of Instagram fitness accounts. *BMC Public Health*, 23, 421.
- ⁷ Sharp, G., Gerrard, Y. (2022) The body image "problem" on social media: Novel directions for the field. *Body Image*, 41, 267-271.
- ⁸ Gerrard, Y. (2018) Beyond the hashtag: Circumventing content moderation on social media. *New Media & Society*, 20(12), 4492-4511.
- ⁹ O'Neill, B. (2023) *Research for the CULT Committee – The influence of social media on the development of children and young people*. Brussels: European Parliament, Policy Department for Structural and Cohesion Policies.
- ¹⁰ Paxton, S.J., McLean, S.A., Rodgers. R.F. (2022) "My critical filter buffers your app filter": Social media literacy as a protective factor for body image. *Body Image*, 40,158-164.
- ¹¹ Better Internet for Kids (2022) A Digital Decade for children and youth: the new European strategy for a better internet for kids (BIK+) <https://digital-strategy.ec.europa.eu/en/library/digital-decade-children-and-youth-new-european-strategy-better-internet-kids-bik>
- ¹² BBC News (2024) Growing skincare use by children is dangerous, say dermatologists. [Growing skincare use by children is dangerous, say dermatologists - BBC News](https://www.bbc.com/news/health-67614444)