



**Online Safety Code for  
Video-Sharing Platform Services**

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**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.

## About eating disorders

Eating disorders are serious and complex mental illnesses that pose risks to a person's physical, psychological, and emotional health and they lead to increased risk of suicide and mortality.<sup>1</sup> They often require medical intervention and ongoing treatment to help a person move towards recovery, with specialised care being key. Early assessment and evidence-based treatment improves the likelihood of recovery.<sup>2</sup> Specialist outpatient treatment represents the most effective and fastest way for most people with eating disorders to recover.<sup>3</sup> Eating disorders involve behavioural, cognitive, emotional and physical aspects, which is why it takes time to recover and find treatment that works for each individual person's experience. Current diagnosable eating disorders include anorexia nervosa, bulimia nervosa, binge eating disorder, avoidant/restrictive food intake disorder (ARFID) and other specified feeding or eating disorder (OSFED). Eating disorders are not a lifestyle choice, a phase or a diet. Eating disorders affect a broad range of people from young people to adults, women and historically overlooked groups such as boys and men, members of the LGBTQIA+ community and those who are neurodivergent.

## Statistics

- Based on epidemiological projections, the NCP-ED estimates that 188,895 people in Ireland will experience an eating disorder at some point in their lives.<sup>4</sup> It is estimated that approximately 1,757 new cases occur in Ireland each year in the 10-49 age group
- Media reporting in 2022 identified an almost five-fold increase in cases of eating disorders at the Children's Hospital in Tallaght over the past eight years<sup>5</sup>
- In July 2023, the Health Research Board (HRB) reported that the number of child and adolescents admissions for eating disorders more than doubled in the last 5 years, from 33 in 2018 to 80 in 2022<sup>6</sup>.

## Role of social media

Social media is a tool for communication and expression and it can be a space for body acceptance. Some people experiencing eating disorders use social media to connect with others genuinely and positively in a similar situation or to share aspects of their illness and recovery. Whilst this is sometimes helpful, there is a fine line between what's helpful and harmful. Aspects of social media can pose challenges to recovery. For example, underrepresentation of the diversity of bodies and ethnicities, misinformation and the promotion of incorrect or harmful recovery strategies, diet culture content, anti-recovery content that's easy to access, content that induces competition and comparisons in recovery, stigmatisation of people in larger bodies, progress and shaming of relapses, algorithms repeating the same trends, risky challenges and inaccurate information about mental health.<sup>7,8</sup>

## Current submission

Bodywhys welcomes the inclusion of online harmful content relating to eating disorders in recent legislation, the Online Safety and Media Regulation Act 2022. We also welcome the opportunity to input into the development of Ireland's first binding Online Safety Code for video-sharing platforms (VSPS). We have answered questions which are most relevant to our area of knowledge, work and experience.

## Responses to Call for Input questions

### Question 1

Ireland's first Online Safety Code should be a template for how online safety issues are addressed by Coimisiún na Meán and in turn, VSPS. This includes efforts to reduce harm, improve accountability, standards, transparency, actions and outcomes, develop long-term objectives, with a focus on ultimately acting in the best interests of those who access, view and interact with online content. The Code may wish take into consideration marginalised groups across race and ethnicity, sexual, gender and socioeconomic backgrounds and those who are differently abled or who experience chronic health issues.<sup>9</sup>

Bodywhys recommends that eating disorders are recognised as a form of online harms in the forthcoming Code. Online harmful content about eating disorders is typically described as 'pro-anorexia' or 'pro-ana'. This material tends to focus on endorsing or promoting specific eating disorder behaviours, such as risky food and weight behaviours. An extensive body of research evidence has identified key implications of exposure to pro-ana content, including how it affects someone's thoughts and feelings, weight and eating behaviours, the level of pressure and stigma they feel under and that the communities are not supportive. Several factors may underline the risks for users of pro-anorexia websites including, increasing availability and accessibility, the type of content and frequency of visits and the vulnerability of the user.<sup>10</sup> Prior to social media, pro-ana material was typically found on message boards, websites or blogs. It must be addressed from a regulatory perspective because of its detrimental impact on users.

## Question 2

For a variety of reasons, some children may not have the confidence and knowledge to express, to a trusted adult, that they've seen, received or experienced something harmful via the online space. A few of what might happen after speaking up is also a worry. It is imperative to design and enforce stringent measures to protect their emotional and psychological well-being. In its submission to the Call for Inputs, the Children's Rights Alliance (CRA) helpfully outline approaches considered by Children Online: Research and Evidence (CO:RE) and in Australia and in the United Kingdom.<sup>11</sup>

## Question 3

- [Urgent Responsibility to Reduce Harms Posed by Social Media on risk for Eating Disorders: An Open Letter to Facebook, Instagram, TikTok, and Other Global Social Media Corporations.](#)
- [Health advisory on social media use in adolescence \(apa.org\).](#)
- [Surgeon General Issues New Advisory About Effects Social Media Use Has on Youth Mental Health | HHS.gov](#)
- [Deadly by Design — Centre for Countering Digital Hate - TikTok pushes harmful content promoting eating disorders and self-harm into young users' feeds | CCDH \(counterhate.com\)](#)
- [Investigating Risks and Opportunities for Children in a Digital World \(lse.ac.uk\)](#)
- [The impact of digital experiences on adolescents with mental health vulnerabilities | Media@LSE](#)
- [New research from Butterfly Foundation highlights impact of social media - Butterfly Foundation](#)
- [Online advertising and eating disorders - Beat \(beateatingdisorders.org.uk\)](#)
- [Global Kids Online | Children's rights in the digital age](#)
- [Can the Metaverse Be Good for Youth Mental Health? Youth-Centred Strategies \(jedfoundation.org\)](#)
- [Insta pro-eating disorder bubble April '22 \(reset.tech\)](#)

- [Childrens-Commissioner-for-England-Life-in-Likes \(childrenscommissioner.gov.uk\)](https://childrenscommissioner.gov.uk)
- [Policies to protect children from the harmful impact of food marketing: WHO guideline](#)

#### Question 4.1

We echo the comments of the CRA who highlight the legal, regulatory and children-centred reasons for introducing option 1, a very detailed, perspective Code.

#### Question 4.3

We agree with the Coimisiún's suggestion for the Code to mirror provisions of the Digital Services Act (DSA), where possible. We further agree on the need for the Code to identify metrics about the timing and accuracy of moderation actions and decisions that apply to types of content.

#### Question 4.4

We live in an increasingly visual and device-centric world, where there is often appearance-based content, messages and advertising. In the era of social media, anyone can share messages related to diet, weight, exercise, food and/or bodies without any requirement to reference relevant qualifications or without information from credible sources. This means that complex topics can be broken down into overly simplistic messages, which can be absorbed by those who are vulnerable, as well as being unhelpful to those who are unwell or trying to recover from an eating disorder. Such messages alone do not cause individual cases of eating disorders, however some may not be age appropriate and contribute to a confusing environment and unrealistic health, fitness and weight goals and norms. The recent Dove video "Cost of Beauty: A Dove Film" profoundly captures how things can escalate and subsequently deteriorate for a person.<sup>12</sup>

Videos can spread rapidly, generate significant viewership, commentary, critiques, responses, traction and interest. Recent videos developed by Webwise through its #SilentWitness campaign show how ordinary social or

peer group situations can be taken out of context and misrepresented online.<sup>13, 14</sup> It is also concerning, as suggested by mainstream media reporting, that some people may turn to social media for mental health advice or to learn if they have a particular illness.<sup>15</sup> As one clinician noted, ‘some of the take-home messages they have picked up are reckless and potentially dangerous.’<sup>16</sup>

Pro-anorexia video content has been identified on a range of VSPS.<sup>17, 18, 19, 20, 21</sup> This is no less problematic than other manifestations of pro-ana material, such as text-based information, lyrics, blogs or extreme diets. Currently, feedback received by Bodywhys suggests that both the way some videos are experienced by, and suggested to, users can be notably problematic. Overall, this material is experienced as intrusive, hard to navigate, with limited success after requesting that it is actioned. For instance, ‘What I eat in a day’ videos which may focus on very restrictive food intake patterns or diets.

#### Question 7

We agree with the summary of the ten measures outlined in Article 28b.3 of the Audiovisual Media Services Directive (AVMSD) in the Coimisiún’s Call for Inputs document.

#### Question 13

Creating and developing media literacy tools is not the responsibility of one group. As outlined by the United States Surgeon General and the Jed Foundation, it requires prioritisation and input from researchers, funders, policymakers, school and community organisations.<sup>22, 23</sup> Media literacy tools and resources available through VSPS must be age appropriate, easy to access and navigate.

#### Question 14-16, 18, 23

We agree with the responses outlined by CRA to these questions.



## Additional comments

Some platforms may produce statistical reports which document the removal of harmful content by time and volume, such as within a community guidelines enforcement framework. Whilst useful overall, how this is reported and organised may sometimes be confusing. Previously, with TikTok for instance, 'dangerous acts', which were not defined as a mental health issue, were bundled together with suicide and self-harm as a combined category. It appears that, only since October 2022, has TikTok combined eating disorders with self-harm and suicide in its reporting and separated out dangerous acts. Where a removal policy or classification changes, VSPS must clarify the implications of this in how they share data about the removal of harmful online content.

We welcome the range of points noted by, and advocacy of, the Academy for Eating Disorders (AED), American Psychological Association (APA), the United States Surgeon General and the Jed Foundation whose work is noted in our submission and whose voices reflect the need for substantial and systemic change.

## Conclusion

We believe that there is a noticeable, yet unsurprising gap between what VSPS stated they have done and what people with direct experience of eating disorders are encountering online. It is unknown at this point whether this is a consequence of inconsistent moderation, the algorithm or other factors. We look forward to the development of the Ireland's first Online Safety Code improving how people affected by eating disorders navigate online spaces.

## Appendix 1: Bodywhys online harms survey feedback

We share the following sample of quotes from voices of lived experience, family members and friends who completed our online harms survey which ran from April-June 2023. We asked people to describe their experiences of encountering harmful online content related to eating disorders, and the effectiveness of the reporting process available from social media platforms.

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“I found it harmful as I’ve seen videos promoting calorie restriction and tips on how to lose weight quickly and dangerously.”

“Specifically, on TikTok and Instagram, what I eat in a day videos promoting extremely restrictive low calorie diets. ‘Recovery’ accounts that promote extreme exercise, for example people claiming to be in eating disorder recovery but really have just turned from one ED to another, like from a restrictive ED to an obsessive exercise focused ED, anything from marathon training to gym obsessed. These accounts are harmful because they're suggesting that recovery should look this certain way, still controlling the way your body looks through a different means.”

“I did not seek it out. I tried to block that type of content but no luck. I feel like it is coming into my personal space and head space repeatedly.”

“It had a lot of tips and tricks encouraging other suffers like myself to want to relapse instead of trying to recover.”

“Tips on how to avoid eating around family, content shaming fat people and encouraging anorexic behaviour and tips to make yourself sick after eating.”

### **End of submission**

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Think Bodywhys CLG, trading as Bodywhys - The Eating Disorders Association of Ireland, is a company limited by guarantee, registered in Ireland with a registered office at 18 Upper Mount Street, Dublin 2 and registered company number 236310.

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