



Ad Standards Community Panel
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Ad Standards Limited
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Case Report

1. Case Number :	0048-22
2. Advertiser :	SA Ambulance Service
3. Product :	Community Awareness
4. Type of Advertisement/Media :	TV - Free to Air
5. Date of Determination	9-Mar-2022
6. DETERMINATION :	Dismissed

ISSUES RAISED

AANA Code of Ethics\2.3 Violence

DESCRIPTION OF ADVERTISEMENT

This television advertisement features vision of accidents and emergencies, with audio of people making calls to 000 about superficial matters.

THE COMPLAINT

A sample of comments which the complainant/s made regarding this advertisement included the following:

Time of the programming of this graphic content was not appropriate for younger viewers and was not suitable for this time slot. The imagery was shocking and this type of advertising is usually not effective yet continues to be produced and aired. It needs to be at a later time. Graphic image warning and option to turn off or over was not given and this was witnessed by a young child that became extremely distressed.

The images used in the ad, especially the dead woman in the pool are very upsetting. The ad has been shown frequently during the Olympics when children are watching.

THE ADVERTISER'S RESPONSE



Comments which the advertiser made in response to the complainant/s regarding this advertisement include the following:

I am writing in response to your letter dated 28 February 2022 in relation to a television commercial aired from 19 January 2022 to 19 February 2022 by the SA Ambulance Service (SAAS) as part of the campaign 'Save 000 for when it matters'. The response provides Ad Standards with information in relation to the SAAS campaign 'Save 000 for when it matters' and specifically the suitability of imagery of an adult female depicted face down in a pool within a television commercial (TVC).

Firstly, I provide some background information as follows:

The campaign was developed by SAAS in early 2022.

SAAS launched 'Save 000 for when it matters', featuring a TVC, radio advertisement, social media and outdoor advertising, on 19 January 2022.

This campaign includes a 30 and 15 second TVC which was filmed and produced by Clemenger BDO (Sydney) and commissioned originally by NSW Health and aired across New South Wales in 2020 and again in 2021.

While the campaign is intended to be thought provoking, there is no violence featured. It features imagery of a motor vehicle accident (no patient imagery), a woman face down in a pool and a workplace injury.

The commercial

The TVC script is provided as Attachment A. The film features adult patients as well as scenes of a motor vehicle accident (no patient imagery), a woman face down in a pool and a workplace injury with a male on the ground. Voiceover is also by adult, featuring simulated audio of Triple Zero (000) calls.

The commercial commences with a scene of a motor vehicle accident. Vision is an aerial shot of two collided vehicles, one overturned. The second scene is of an arm, which appears to show a needle to the side. Then the film moves to a scene of three seconds of an aerial shot, this time of a female adult, face down in a pool. The fourth scene is another aerial shot of a workplace accident with a male adult on the ground in a factory setting. From there, ten seconds in, there are a series of shots depicting an ambulance response, including a scene showing an ambulance with lights and sirens. The voiceover presents as a series of calls to triple zero, each 'trivial' cases to contrast the vision. The pool scene (and the motor vehicle accident and arm) includes the voiceover 'my husband fell down and has broken his big toe'.

The advert includes a call to action to contact HealthDirect to seek advice about non-urgent medical needs and to use (save) 000 for when it matters, i.e. scenarios such as drownings, motor vehicles accidents and workplace injuries. The intent is to illustrate that these are the types of calls ambulances are required to attend and should be available to do so.

The TVC (with different end credits) had already been aired across New South Wales after being launched by NSW Health. Its use across Australia has been encouraged and



supported by the National Emergency Communications Working Group (NECWG). To date the TVC has aired in New South Wales and South Australia.

The campaign

The commercial is part of a campaign aiming to reduce the number of unnecessary calls to Triple Zero (000) and it uses confronting imagery to promote an important health service and as such is deemed a justifiable use of 'violence' or graphic imagery. All of the campaign creative highlights the types of cases that require an emergency response, e.g. cardiac arrest, drowning and stroke and questions the need to call Triple Zero (000) in non-emergency situations (e.g. a broken toe). Text or voice juxtaposes emergency scenes with health scenarios that are not, e.g. tennis elbow injury, fishing hook in toe. This creative has been utilised for paid media from January 2022 to February 2022 and will be used in below the line materials throughout the duration of campaign.

Triple Zero calls to SA Ambulance Service (SAAS) have been increasing by 6% per annum since 2017-18. Nearly 30% of these calls are for non-emergency situations. This indicates that there are several factors that influence the reason for calling an ambulance outside of an emergency. Since 23 November 2021 when borders opened, calls to Triple Zero (000) increased daily, with a 25.8% increase in volume (data from 3 January- 9 January 2022). The demand contributes to ramping with the least sick patients waiting for treatment in an ambulance while higher priority cases are seen in the Emergency Department (ED).

Increased demand on SAAS notably, during the SA COVID-19 emergency from December 2021 required an urgent campaign to encourage the community to call Triple Zero (000) for emergencies. A campaign was required specifically at this time to support a reduction of demand on Triple Zero (000) ambulance calls, as South Australia was predicting and began experiencing a surge due to increasing community transmission of COVID-19 cases. This was a high priority campaign and undertaken as part of the SAAS Resilience Plan.

It should be noted that SAAS is an agency of SA Health and is operating under a range of SA Emergency Management Directions (COVID).

The campaign communications plan, provided as Attachment B is largely an external one, targeting the general public over aged 18. It is supported by internal communications to the SAAS workforce about the impact of COVID-19 on service delivery and a call to improve referrals to alternate pathways to improve SAAS response times.

There are two creative executions, one as described and the second as below: both utilising a consistent brand featuring the tagline 'Save 000 for when it matters' with imagery of a mobile phone.

Execution two: Showcase of other healthcare professionals who are ready and able to help manage non-urgent health care issues through patient referral. These include



GPs, pharmacists, the Children's Urgent Care Service and COVID-19 services. This creative will be utilised for below the line materials from March 2022 once paid media has ceased.

Examples of still creative, including social media tiles, outdoor ads and posters, can be viewed as Attachments C, D and E. A radio script is provided as Attachment F. The radio recording is provided as Attachment G.

Approval, rating and scheduling

While SAAS had already been working on a campaign of a similar nature prior to communications from the NECWG requesting that all agencies consider utilising the NSW TVC, given the availability of such and its success in NSW, the TVC was utilised in South Australia as part of a broader campaign, linked by a tagline 'Save 000 for when it matters' and a concept of juxtaposing serious emergencies with trivial incidents. In South Australia, all advertising resulting in costs over \$200,000 ex GST is assessed by the Government Communications Advisory Group, in line with the guidance available: <https://www.dpc.sa.gov.au/about-the-department/accountability/government-marketing-advertising-expenditure> The campaign items, including the TVC, were reviewed by the Government Communications Advisory Group (GCAG). The Manager Communications and Engagement, SAAS attended the group on 13 January 2022 with Senior Communications Advisor, SAAS. The Committee was chaired by the Hon Rob Lucas, Treasurer.

GCAG approval for the TVC is shown as Attachment H.

The film was subsequently reviewed by the CAD and determined to be a PG rating (Attachment I). There are no time limitations of time to air to TV to a PG rating. The CAD handbook confirms:

2.2.1 PG Classification zone. Material that has been classified C, P, G or PG may be broadcast at any time.

It is noted that the original CAD rating in New South Wales was G. This was revised for SAAS in 2021, as noted in Attachment I, due to changes in public sentiment. Advertising occurred via commercial television in New South Wales at similar times to those in South Australia without a warning message, also not considered necessary in South Australia.

Booking for all advertising was advertised and scheduled by Carat, government master media buying agency. The schedule is attached as Attachment J. It should be noted that the schedule was originally plotted for another Government of South Australia campaign.

Consumer feedback and sentiment

The campaign was based on comprehensive research and the development process sound. The design and messaging of the advertisement is based on the latest research in this field and aims to resonate strongly with South Australians over 18 and influence



the rate of non-essential health calls to Triple Zero (000) in order to ensure continued response by SAAS to those in need.

Concept testing was undertaken with the SAAS Consumer and Community Advisory Committee. The Committee was shown the TVC with no concerns noted about the imagery, including of the 'drowned woman'. The group was noted to giggle at the juxtaposition of imagery and trivial messaging, which suggests it was understood and resonated well, with a clear picture of what was and wasn't an emergency. Consumers did not comment on the level of violence/graphic content. Concerns were in fact noted about whether the audience would refrain from contacting 000 if they weren't sure it was a genuine emergency. This demonstrates the value of the campaign and the strength of such imagery in changing behaviours. A summary is provided as Attachment K.

No concerns or complaints have arisen from the airing of the TVC across New South Wales to date.

SAAS has not received any complaints directly and comments on social media have been positive. There have been no comments in relation to the imagery specifically. While evaluation of the campaign has not yet been completed, call volume to Triple Zero (000) reduced significantly during the initial campaign, which indicates the value of the campaign. Estimated TARP for the TVC is 7,729.5. Additionally, social media reach has been strong, again with no negative comments in regard to the imagery. The film reached 5,641 individuals in its first few minutes and 73,558 via Facebook alone, to date.

The Advertiser Code Section 2

Ad Standards has identified section 2.3 of the AANA Advertiser Code of Ethics (Violence – causes alarm or distress) in its initial assessment of the complaint. While the floating woman depicted in the advertisement could technically be considered graphic, it is not an act of violence, the imagery is highly stylised and aims to represent the value of ambulance services. It is unlikely to be perceived as an actual violent act or condoning of such an act.

As requested, a response to each of the other parts of Section 2 has been provided below:

2.1 - Discrimination or vilification – The 'Save000 for when it matters' advertisement in no way discriminates against or vilifies those who are in genuine need of an ambulance or those injured. Instead it aims to improve the health and wellbeing of individuals by encouraging those who do need an ambulance to free up the telephone lines and resources for those who do.

2.2 – Exploitative or degrading – The advertisement is not exploitative or degrading to the public.

2.4 – Sex, sexuality and nudity – There is no sex, sexuality or nudity suggested or depicted in the advertisement.

2.5 – Language – There is no profane language used in the advertisement.



2.6 – Health and safety – The campaign is a public health advertisement with the objective of improving access to healthcare.

2.7 – Clearly distinguishable advertising – This is clearly distinguishable as an advertising or marketing communication. It is clearly branded as an SA Health/SAAS advertisement and also includes the campaign logo and HealthDirect helpline/website.

I reiterate that this advertisement includes messaging relating to public health and safety. The level of graphic imagery is considered as being justifiable in such an important public education campaign because of the vital impact on saving lives it is intended to achieve.

In this case and considering the PG classification, SAAS considered that the graphic nature of the images shown at the time of airing was justified by the important public health message. We also considered that the broadcast of this advertisement in a television environment was appropriate.

Thank you for the opportunity to respond to the complaints received regarding ‘Save 000 for when it matters’. SAAS is seeking a favourable determination in order to air this effective public health advertisement in the future.

THE DETERMINATION

The Ad Standards Community Panel (the Panel) considered whether this advertisement breaches Section 2 of the AANA Code of Ethics (the Code).

The Panel noted the complainants’ concerns that the advertisement includes graphic imagery which is distressing, and is inappropriate for younger viewers.

The Panel viewed the advertisement and noted the advertiser’s response.

Section 2.3: Advertising shall not present or portray violence unless it is justifiable in the context of the product or service advertised

The Panel noted the Practice Note for this section of the Code which states “*The results or consequences of violence (e.g. a black eye) and audio representations of violence may also be prohibited. However, graphic depictions of violence or the consequences of violence may be justified by the community safety message involved*”.

Does the advertisement contain violence?

The Panel noted that the advertisement does contain scenes of a car accident, a woman face-down in a pool, and people lying on the ground. The Panel considered that while active violence is not shown in the advertisement, the aftereffects of violence are depicted.

The Panel considered that the advertisement did contain violence.



Is the violence portrayed justifiable in the context of the product or service advertised?

The Panel noted that whilst some of the images show people that appear in distress the Panel considered that these images are emotionally engaging rather than violent in an aggressive or threatening manner. The Panel noted that the sounds of the advertisement contains audio clips of people calling with trivial concerns, and then the voiceover of a man highlighting a problem – that of trivial calls taking ambulance officers away from other emergencies such as the ones depicted. The Panel noted that the voiceover does highlight the issue and directs viewers to another option other than 000.

The Panel considered that the important community message being delivered in the advertisement was a critical message that justified the use of imagery that would grab the attention of the viewer and would lead to an increased awareness and consideration of the serious issue. The Panel considered that although the imagery was impactful it did not feature gore or depict acts of violence. The Panel considered that the images were designed to shock, however they were emotionally impactful rather than graphic.

The Panel acknowledged that the content and subject matter of the advertisement would be upsetting to some viewers, including children, but considered that the advertisement is using factual information in an informative manner to raise awareness of an important issue and includes a call to action, and in the Panel's view the overall tone is that positive action works and this is a message which children should be able to process.

The Panel considered that the imagery used in the advertisement was justifiable in the context of the organisation being advertised.

Section 2.3 Conclusion

The Panel determined that the advertisement did not present or portray violence which was unjustifiable in the context of the product or service advertised and did not breach Section 2.3 of the Code.

Conclusion

Finding that the advertisement did not breach any other section of the Code, the Panel dismissed the complaints.