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Ad Standards Limited
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Case Report

1. Case Number :	0096-21
2. Advertiser :	Department of Social Services
3. Product :	Community Awareness
4. Type of Advertisement/Media :	TV - Free to Air
5. Date of Determination	28-Apr-2021
6. DETERMINATION :	Dismissed

ISSUES RAISED

AANA Code of Ethics\2.1 Discrimination or Vilification
AANA Code of Ethics\2.3 Violence

DESCRIPTION OF ADVERTISEMENT

This television advertisement has a 45second version and three 15second versions.

45 second:

At a BBQ, a boy throws a ball at a girl standing against a garage as she yells for him to stop. His parents consider whether to intervene.

At a soccer match, a father tell his son he's playing 'like a girl' while an older man looks uncomfortable.

On a walk home, a girl receives disrespectful messages from her boyfriend, which concerns her older sister.

A couple in their 20's argues and the man raises his arm to throw his phone. The woman ducks, and the scene changes to the young girl at the BBQ ducking from the ball. The father calls his son over.

The 15 second executions show the secondary character take action to address the behaviour which is the focus of the advertisement.

THE COMPLAINT

Comments which the complainant/s made regarding this advertisement included the following:



The ad was extremely confronting and the level of violence shown was not necessary to get the message across.

This ad depicts white male boys are bullies towards not so white females. This ad reinforces that all white male boys are bullies. Not so.

THE ADVERTISER'S RESPONSE

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

The campaign – Stop it at the Start

This national campaign aims to help break the cycle of violence against women and their children by encouraging adults to reflect on their attitudes, and have conversations about respect with young people.

It is an Australian Government initiative, jointly funded by state and territory governments.

Phase one ran in April 2016, and Phase two ran in 2018. Phase three of the campaign launched on Sunday 14 March 2021 and will run until Saturday 31 July 2021.

Phase three aims to encourage adults to take action to actively promote positive attitudes around respectful relationships and gender equality. It acknowledges that even the simplest, smallest actions can have a big impact on both an individual and the broader community. This can include calling out disrespect when we see it, role modelling positive behaviour or having conversations about respect with the young people in our lives.

What does the campaign aim to do?

The campaign helps all adults (parents, family members, teachers, coaches, employers and other role models) to look at their own attitudes, and start a conversation about respect with the young people in their lives.

We know that children are keen observers of what adults say and do and are greatly influenced by them. When it comes to teaching respect, we all influence a child's idea of what is right and wrong.

Young people pick up simple things like our gestures, reactions and the words we choose. They might take our words at face value and interpret them in ways we didn't intend, or see it as an excuse or permission to behave in a certain way. Over time, these everyday interactions shape what children believe about how others should be treated.



Stop it at the Start highlights the role we all play in raising a generation of respectful young people, the potential for a positive change if we come together as a community.

Who is the campaign targeting?

The campaign targets adult (male and female) influencers of young people aged 10-17, such as parents and family members, teachers, coaches, community leaders and employers.

It does not target children, victims, perpetrators or bystanders.

It is a primary prevention campaign that aims to break the cycle of violence by raising a generation of young people with positive attitudes towards respectful relationships and gender equality.

How was the campaign developed?

*The campaign approach was informed by extensive qualitative and quantitative research across Australia by Kantar Public (formerly Taylor Nelson Sofres). The research report, *Reducing violence against women and their children* is available on the DSS website.*

Parenting experts, and child and behavioural psychologists helped develop the range of resources and tools for parents and other influencers.

What were the main research findings?

The research found there's a link between violence towards women and attitudes of disrespect and gender inequality. But when thinking about our own reactions, we might be surprised to recognise some of the most common ways we excuse disrespectful and aggressive behaviour. There are some automatic assumptions and responses we make, often without realising:

- We play down disrespectful or aggressive behaviour ("don't worry, it wasn't that bad").*
- We accept aggression as just part of being a boy ("boys will be boys").*
- We blame girls ("what was she wearing?").*
- We raise girls to accept disrespect ("it's okay, he probably did it because he likes you").*
- When we make these excuses, we're allowing disrespectful behaviour to become a normal part of growing up.*

The research also found that many parents and other adults are worried about whether they should get involved. They're concerned about embarrassing their child, or being in conflict with other parents.

Another important finding was that young people want consistent messages – to hear many voices across the community advocating for a cultural change.



Multiple waves of concept testing research were also undertaken as part of the creative development of Phase three. This research was conducted nationally, with adults and young people, and consistently showed that the messages communicated by the advertising demonstrated:

- the link between disrespect and violence against women*
- the impact of individual influence on young people*
- that disrespectful and aggressive behaviour is learned from an early age*
- that there is a trajectory of disrespectful / aggressive behaviour*
- that there is a need for intervention when disrespectful and aggressive behaviours are observed – intervening in one’s own behaviour (personal intervention), as well as the behaviour of others*
- that this behavioural modification can be undertaken ‘in the moment’, and an individual’s behavior can be changed to achieve a positive resolution*
- that the need to address disrespectful and aggressive behaviour outweighs any potential personal costs of getting involved*
- that the costs of not taking action to address this issue are too high*
- that there is a need for preventative conversations with young people.*
- the need for community-level change, and the need for collective action and responsibility.*

What resources are available?

A range of resources and tools are available on the campaign website to help influencers have conversations with young people. These were developed with the assistance of parenting experts and child and behavioural psychologists. They include:

- The Conversation Guide, to help parents and family members talk about respect with young people about the importance of respectful relationships from an early age.*
- The Respect Checklist, for adults to become more aware of what young people might be thinking in disrespectful or aggressive situations.*
- The Excuse Interpreter, to discover the hidden meanings of common expressions that can excuse disrespectful behaviour.*
- Animations that show how as a community, we can change what young people accept as normal behaviour.*
- Videos of Australians from different walks of life sharing their thoughts around respect and calling out disrespect.*

Products are available for Indigenous Australians, those from a culturally and linguistically diverse background, and parents and family members who have children with disability.

While the campaign does not target victims, the website provides information about support services available as a duty of care. This includes services for women, men, families and children, as well as for people with disability and from those from diverse cultural backgrounds.

Why do we need this campaign?



Violence against women and their children is a serious issue in Australia:

- *ABS data shows that:*
 - o *One in six women have experienced physical or sexual violence by a current or former partner since the age of 15. This figure increases to nearly one in four women when violence by boyfriends, girlfriends and dates is included.*
 - o *one in six women have experienced physical or sexual violence by a current or former partner.*
 - o *one in four Australian women has experienced emotional abuse from a current or former partner.*

Note: figures have been rounded.

The good news is that attitudes to domestic, family and sexual violence are improving, with more Australians recognising most behaviours constituting violence against women in 2017 than in 2013. Violence against women isn't just physical – it includes a range of behaviours designed to intimidate or control.

However, what we often don't realise is that the cycle of violence can start with the beliefs and attitudes boys and girls develop from a young age.

From early on boys and girls begin to believe there are reasons which make disrespectful or aggressive behaviour acceptable. Girls question whether it's their fault, and boys tell each other it was a bit of a joke. This can lead to attitudes like:

- *one in four young people don't think it's serious when guys insult or verbally harass girls in the street.*
- *one in five young people believe there are times when women bear some responsibility for sexual assault.*
- *one in four young people don't think it's serious if a guy, who's normally gentle, sometimes slaps his girlfriend when he's drunk and they're arguing.*
- *over one in three young men believe that women prefer a man to be in charge of a relationship.*

Since young people's attitudes and behaviours are shaped by those around them it's important to expose them to positive influences where they live, work, learn and socialise. As adults, we need to recognise and reconcile our role as important influencers of the younger generation.

Response against the Code of Ethics

The 45 second advertisement has been reviewed by Commercials Advice Pty Ltd (CAD) and assessed as having a Parental Guidance / Warning J classification. All three 15 second advertisements have been reviewed by CAD and assessed as having a General G classification.

These classifications means that the commercials may be broadcast at any time except during P and C programs, or adjacent to P or C periods. Advertising with the J classification requires additional care when placing in PG classified programs principally directed to children.



These ratings are used to guide the time of play for each spot. Media has been booked to ensure the advertisement appears only in programming that is appropriate for these classifications.

2.1 Discrimination or vilification

The Stop it at the Start campaign does not discriminate against or vilify a person or section of the community on account of race, ethnicity, nationality, gender, age, sexual preference, religion, disability, mental illness or political belief.

Throughout the extensive research that formed the evidence base for the campaign, specific attention was given to understanding the desired behavioural response - who was being asked to modify behaviour, and what that desired modification was. Additionally, specific attention was given to understanding people's interpretation of the campaign's target audience.

The vast majority of participants identified the campaign's behavioural message as 'asking all adults (regardless of gender, cultural background, socio-economic-status) to consider their own responses to occurrences of disrespectful or abusive behaviour, and the inadvertent impact these responses may have on the cycle of violence against women. This was consistently mentioned by both adults and young people who participated in the research.

The research asserts the advertisements were interpreted as targeting all adults to modify their personal behavioural responses to situations that may involve disrespect or aggressive behaviour. The focus of the behaviour was therefore predominantly on the response of the influencer.

There was no evidence throughout the research that the advertisement was depicting a specific cohort of the population as either perpetrators or victims. The research asserts the campaign is interpreted by the majority as portraying alternative ways for all influencers to respond.

This research was conducted nationally, and found that the vast majority of participants identified the campaign's behavioural message as 'asking all adults (regardless of gender, cultural background, socio-economic-status) to consider their own behaviour and the inadvertent impact this may have on the cycle of violence against women'. This was consistently mentioned by both adults and young people who participated in the research.

Additionally, the Stop it at the Start tagline was interpreted by the majority as encouraging adults to 'stop' their own behaviours which may inadvertently play a role in perpetuating the cycle of violence against women.

The call to action at the end of the advertisement is to the campaign website, which hosts a range of tools and resources, developed in consultation with parenting experts



and child and behavioural psychologists, to help adults have conversations about respect with young people.

Gender representation

Prevalence of violence against women

This campaign aims to reduce violence against women.

- The prevalence of violence against women in our community is high.*
- The latest Australian Bureau of Statistics data shows women are nearly three times more likely than men to have been victims of violence (physical or sexual) at the hands of a partner since the age of 15.*
- This data also showed one in six women has been a victim of violence perpetrated by a partner; one in five has been a victim of sexual violence (by any perpetrator); and one in four has experienced emotional abuse by a partner.*
- In 2015-16, violence against women and their children was estimated to have cost the Australian economy between \$22 billion and \$26 billion, with victims bearing approximately 50 per cent of that cost.*
- There is an overwhelming body of evidence, including by the World Health Organisation (WHO), of the correlation between violence against women and attitudes around respectful relationships and gender equality.*

The campaign takes a primary prevention approach aimed at both male and female influencers of young people aged 10-17. This audience group was selected following comprehensive research.

Research findings - advertising messaging

The campaign was developed using extensive research. Throughout this research, specific attention was afforded to the target audience's interpretation of the advertisements to ensure the intended messages were correctly delivered.

Approximately 346 Australians (adult males, adult females, young males, young females in each state and territory, across Australia) were shown the campaign throughout its creative development. They discussed the campaign in-depth with researchers for approximately 566 hours (an average of 98 minutes with each individual). Interpretation of the executions was assessed among adults (males and females) and young people (males and females).

The research asserts the advertisements were interpreted as targeting all adults (irrespective of gender), to recognise their influence on young people (irrespective of gender).

Messages surrounding explicit or implicit vilification of males as sole perpetrators of domestic violence are not present.

Messages surrounding explicit or implicit depiction of females as the only gender with lived experiences of domestic violence (as victims) are also not present.



Messages surrounding explicit or implicit reinforcement of poor gender stereotypes are not present. This was reinforced by the equal depiction of male and female adults / influencers across the creative suite. Many research participants interpreted that both boys and girls can be negatively influenced by unintentional responses from adults.

Additionally, many adults (males and females) interpreted they were themselves responding this way as a result of historical conditioning which had led them to unconsciously undertake potentially negative responses.

Policy background

Ensuring the safety of all Australians is a key priority for the Australian Government. Domestic and family violence and sexual assault cannot be excused or justified under any circumstances. All victims, regardless of their gender, need compassionate and highly responsive support and all perpetrators must be held accountable for their violence.

The National Plan to Reduce Violence against Women and their Children 2010-2022 (the National Plan) was developed on the basis of extensive consultations and coordinates actions and investment across all Australian jurisdictions to reduce violence against women and their children.

The focus on reducing violence against women and their children is in response to family and domestic violence disproportionately affecting women, and being overwhelmingly perpetrated by men. Data from the 2016 Australian Bureau of Statistics Personal Safety Survey shows that while men are more likely to experience violence overall, this is more often at the hands of a stranger or acquaintance than their partner at home. Women, on the other hand, are more likely to experience violence from a partner or former partner. For further information, view ANROWS key statistics on women's experiences of domestic and family violence and sexual assault.

The campaign aligns with the remit of the National Plan, and its practical initiatives to stop violence from happening in the first place, and encourage young people to build respectful relationships.

2.2 Exploitative and degrading

The Stop it at the Start campaign does not employ sexual appeal. The commercial does not exploit or degrade any individual or group of people.

2.3 Violence

The Phase three Stop it at the Start campaign's 45 second television advertisement portrays suggestive violent behaviour. As outlined within the script, the advertisement includes a young couple arguing and the young man raises his arm as if to throw his phone, however the commercial cuts to the next scene before the violence occurs. This meets the requirements of CAD's Parental Guidance / Warning J classification.



This portrayal of suggestive violence is considered appropriate in the context of the campaign. It aims to prevent violence against women and their children, by educating influencers about the connection between disrespect and violence, as well as the attitudes that excuse, condone or trivialise violence.

Results from campaign research (TNS 2015) and the National Community Attitudes Survey (VicHealth 2014) show that a significant proportion of people hold attitudes that put them at-risk of perpetrating or excusing violence. To change this, we need to demonstrate the link between attitudes of disrespect and violence against women. Additionally, we need to demonstrate the link between influencer responses, and the positive impact this can have.

The research associated with this campaign (2015-2020) has consistently asserted that in order for the link between disrespectful behaviour, violence supportive attitudes, and influencer responses to be established, the individual acts portrayed must appropriately depict 'intended' and 'targeted' (not 'accidental') behaviour towards a female. The opening scene was tested extensively with young people and adults to ensure it established this link.

There was no evidence throughout the research that the advertisement was depicting violence unnecessarily. The research asserts the campaign is interpreted by the majority as appropriately portraying 'intended behaviour' in order to establish the link between disrespect and violence against women.

2.4 Sex, sexuality and nudity

The Stop it at the Start campaign does not depict sex, sexuality or nudity.

2.5 Language

The Stop it at the Start campaign only uses language that is appropriate in the circumstances, and as indicated above, the CAD classifications of G and J were appropriate for the audience and media placements. The language used was carefully selected to be reflective of society's actual responses to disrespectful behaviour, based on the research conducted by Kantar Public. There is no strong or obscene language

2.6 Health and Safety

Awareness and understanding of violence against women is high amongst Australians, and most adults agree it's wrong (VicHealth 2014). The Stop it at the Start campaign is not contrary to prevailing community standards on health and safety as it aims help break the cycle of violence against women and their children by encouraging adults to reflect on their attitudes, and have conversations about respect with young people.

The Department of Social Services, its creative agency and production partners take working with children extremely seriously and ensure the utmost care on these projects.



As part of the production and filming process, all strict standards and policies set out by the State Government and the Office of Children's Guardian were adhered to. As part of this approvals process:

- *Pre-employment notification was completed*
- *Details of any risks that were identified for children associated with the work location, the child's role or schedule were provided*
- *A detailed proposed strategy for minimising any risks to any children on set was provided*
- *Parents/guardians were supplied and agreed to the creative agency's Child Safe Codes of Conduct that details the employment of children and their rights to ensure a safe working environment.*

In addition, the following materials were supplied to ensure there was no risk to any children both physically or emotionally:

- *the script, storyboard, mood board or layout to help set the context of the content being filmed*
- *proposed employment schedule for children*
- *safety reports or risk assessments that were specific to the children and relevant to production.*

There was also careful consultation throughout the production process with casting agents, child guardians, the children, as well as on-set crew responsible for overseeing the welfare of the children, including a certified nurse. At no time during the shoot were any children placed in undue harm.

2.7 Distinguishable as advertising

This advertisement falls within the definition of advertising under AANA codes. It is clearly distinguishable as such by the audience/viewer through the use of logo, government authorisations, disclaimer, website and end line super/voice over. It has been placed within a commercial break and recognised by CAD as an advertisement.

Conclusion

To conclude, the Department of Social Services does not believe this advertisement contravenes Section 2 of the Code.

References

- *Australian Bureau of Statistics 2016, Personal Safety, cat. no. 4906.0, <http://www.abs.gov.au/ausstats/abs@.nsf/mf/4906.0>*
- *ANROWS, National Community Attitudes towards Violence against Women Survey (anrows.org.au), 2017*
- *Hall and Partners | Open Mind 2015, The Line campaign – Summary of research findings, Hall & Partners | Open Mind, Sydney.*
- *KPMG 2016, The Cost of Violence against Women and their Children in Australia, Australian Government.*
- *Taylor Nelson Sofres, 2015, Violence against women and their children – formative research report, TNS, Sydney.*



- *VicHealth 2014, Australians' attitudes towards violence against women. Findings from the 2013 National Community Attitudes towards Violence Against Women Survey (NCAS), Victorian Health Promotion Foundation, Melbourne.*
- *VicHealth 2015, Young Australians' attitudes towards violence against women, Victorian Health Promotion Foundation, Melbourne.*
- *World Health Organization 2005, WHO multi-country study on women's health and domestic violence against women, World Health Organization, Geneva.*
- *Youth Action NSW & White Ribbon Australia 2014, Young people's attitudes towards domestic and dating violence, Youth Action NSW & White Ribbon Australia, North Sydney.*

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 is racist, sexist and violent.

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

Section 2.1: Advertising or Marketing Communication shall not portray people or depict material in a way which discriminates against or vilifies a person or section of the community on account of race, ethnicity, nationality, gender, age, sexual preference, religion, disability, mental illness or political belief.

The Panel noted the AANA Practice Note which provides guidance on the meaning of:

- Discrimination - unfair or less favourable treatment
- Vilification - humiliates, intimidates, incites hatred, contempt or ridicule
- Gender - male, female or trans-gender characteristics
- Race - viewed broadly this term includes colour, descent or ancestry, ethnicity, nationality, and includes, for example, ideas of ethnicity covering people of Jewish or Muslim origin.

Does the advertisement portray material in a way which discriminates against or vilifies a person on account of gender?

The Panel noted the complainants' concerns that the advertisement depicts violence by men against women but that it ignores violence by women against men.

The Panel noted it had previously considered similar complaints in case 0302/13 and in case 0212/16 where:

"The Panel noted that the advertisement features a voiceover stating statistics about violence against women. The Panel noted the complainant's concerns that the advertisement does not mention violence against men.



“The Panel noted the advertiser’s response that White Ribbon Australia specifically target men’s violence against women and that the statistics they use regarding the prevalence of violence towards women by men were obtained by the Australian Institute of Criminology.

“The Panel considered that it is not discriminatory towards men to highlight statistical information regarding domestic violence against women.”

In the current advertisement the Panel noted that the advertisement focuses on changing disrespectful behaviour at the start, by depicting parents calling their son over to have a conversation about his behaviour towards a girl – throwing a ball at her.

The Panel noted the advertiser’s response that the advertisement reflects statistics that the majority of domestic violence is committed by men against women and considered that it was reasonable for the advertiser to target a particular demographic in order to garner the best results.

Consistent with its previous determinations the Panel considered that by highlighting the issue of domestic violence against women the advertisement does not suggest that only men are responsible for domestic violence or that all men are likely to commit domestic violence or that women could not also be responsible for domestic violence. The Panel considered that the advertisement did not portray or depict material in a way which discriminates against or vilifies a person or section of the community on account of gender.

Does the advertisement portray material in a way which discriminates against or vilifies a person on account of race?

The Panel noted a complainant’s assertion that the boy in the advertisement is Caucasian and is throwing a ball at a girl who is not Caucasian, and as such the advertisement is suggesting that all Caucasian boys are bullies, particularly towards non-Caucasian girls.

The Panel noted that the race of both children is unclear, and it is not mentioned nor is it a focus of the advertisement.

The Panel noted in the current advertisement that the focus is on the behaviours demonstrated rather than the race or ethnicity of the perpetrators and considered that the advertisement does not suggest that only Caucasian men commit domestic violence. The Panel considered that the advertisement did not portray or depict material in a way which discriminates against or vilifies a person or section of the community on account of race, nationality or ethnicity.

Section 2.1 conclusion



Finding that the advertisement did not portray material in a way which discriminates against or vilifies a person or section of the community on account of race or gender, the Panel determined that the advertisement did not breach Section 2.1 of the Code.

Section 2.3 Advertising or Marketing Communications 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 depicts a scene of a boy throwing a ball at a girl and considered that while the viewer does not see the ball make contact with the girl the sound of the ball hitting the garage is jarring. The Panel considered that the advertisement did depict violence.

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

The Panel considered that the level of violence depicted in the advertisement was not overly graphic or inappropriate in the context of an important community awareness advertisement aimed at a broad audience.

The Panel considered that the advertisement did present or portray violence but that it was justifiable on the context of the product or service advertised.

Section 2.3 conclusion

In the Panel’s view the advertisement did portray violence that was justifiable in the context of the product being 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.