



Case Report

1	Case Number	0166/11
2	Advertiser	Drug & Alcohol Services South Australia
3	Product	Community Awareness
4	Type of Advertisement / media	TV
5	Date of Determination	25/05/2011
6	DETERMINATION	Dismissed

ISSUES RAISED

- 2.6 - Health and Safety within prevailing Community Standards
- Other Causes alarm and distress

DESCRIPTION OF THE ADVERTISEMENT

Three young women are in the ladies toilet of a nightclub. They see another young woman slumped on the floor of one of the cubicles, leaning against the toilet bowl looking very drunk. The women laugh at her and one of them says she knows this woman from work and that she cannot wait to tell everyone about this. The text, "Drink too much, you're asking for trouble" appears on screen followed by, "Govt. SA/SA Health. DASSA alcohol.sa.gov.au 1300 131 340".

THE COMPLAINT

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

The advertisement in question shows a young woman in a vulnerable position in a public toilet in a nightclub almost completely unconscious and in obvious need of assistance. Instead of helping the young woman the other young women laugh cruelly at her and make no attempt to help or get her home to safety. The slogan of the ad is: "Drink too much: you're asking for trouble" shown at the conclusion of the ad. This slogan suggests that whatever happens to the young woman in her vulnerable state is her own fault. Given the way she is depicted in the advertisement scantily dressed and lying unconscious and given the victim-blaming tone of the slogan this ad could have upsetting and offensive resonances for rape survivors and for women generally. Alcohol is involved in a large proportion of rape cases and is the preferred weapon for rapists over the use of overt force (See this recent study:

<http://www.innovations.harvard.edu/cache/documents/1348/134851.pdf>). The fact that the other women in the ad insult her and offer her no help should not be blamed on the unconscious woman. How do they know that she has not had her drink spiked? How do they know that she has not already been raped or assaulted that night? The ad offers no context for the woman's inebriated state and implicitly sides with the cruel women suggesting that it is OK to insult and pass judgement on an unconscious woman rather than helping her. Although the ad offers no overt suggestion that the woman is in danger of being raped or assaulted the sinister tone of the slogan hints that the woman is in more danger than just being laughed at by her peers. Furthermore it participates in rape culture by blaming an inebriated woman for whatever happens to her by its use of the slogan: "Drink too much: you're asking for trouble." Given that 1 in 5 Australian women have been raped and that many women are victimised while under the influence of alcohol or drugs whether consensually imbibed or forced upon them I believe that this ad would be offensive to a large number of Australians. Its suggestion that the unconscious woman is "asking for trouble" and that it is OK to insult and abandon a vulnerable person is an unacceptable message to send to young Australian women (the obvious target audience of this ad - especially given its prime time placement during the programme Home and Away).

THE ADVERTISER'S RESPONSE

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

The 'Drink too much, you're asking for trouble' campaign was launched on 18 April 2011. It includes the television advertisement known as 'Friends', which is part of a suite of four 15-second television advertisements with the tagline, 'Drink too much, you're asking for trouble'. The suite of television advertisements is aimed at males aged 18 to 39 years and females aged 18 to 29 years, These demographics are the most likely to drink at risky levels on a weekly basis and hence put themselves and others at risk of the serious consequences of drinking too much as depicted in the campaign advertising:

- A young woman being humiliated by her peers ('Friends')*
- A young woman being treated for alcohol poisoning ('Ambo')*
- A young man being arrested for an alcohol-fuelled assault ('Paddy Wagon')*
- A hung-over father vomiting in front of his young daughter ('Daughter').*

The suite of four television commercials is shown on selected free-to-air television stations around South Australia (7, 9, 10, SBS, One, WIN Mount Gambier, WIN Riverland, GTSPTL Port Pirie and Port Lincoln).

Background

The aim of the 'Drink too much, you're asking for trouble' campaign is to reduce the South Australian community's acceptance of public drunkenness. The campaign was developed to deliberately highlight the frequent and very real consequences of drinking too much and prompt people to think about how drinking too much can have a negative impact on themselves, their families and friends.

In Australia, alcohol misuse has a significant impact on health and safety, law enforcement and family services. Its impact is felt not only by the individuals who drink too much and their

families, but also the wider community. It is estimated that alcohol misuse costs the Australian community more than \$15 billion annually',

In Australia, alcohol is responsible for, or contributes to:

- 30% of road accidents²
- 44% of fire injuries²
- 34% of falls and drownings²
- 16% of child abuse cases²
- 12% of suicides²
- 10% of industrial accidents²

In South Australia, approximately 7000 hospitalisations and 300 deaths are attributable to alcohol each year.

In 2010, more than 70,000 Australians were victims of alcohol-related assault⁴

In 2008/09, in the Adelaide central business district:

58% of victim-reported crime was alcohol related.

65% of serious assaults were alcohol related⁵

65% of minor assaults were alcohol related⁵

90 alcohol-related incidents of glassings occurred (smashed drink container used as a weapon)⁶,

Whilst drink-driving and violence account for the largest proportion of harms, excessive alcohol consumption also results in a range of other harms including, but not limited to, unsafe sexual practices, sexual assault, family breakdown and public embarrassment or humiliation.

Research

The development of the 'Drink too much, you're asking for trouble' campaign took into account findings from the previous 'Drink too much, it gets ugly' campaign

(<http://11VWW.alcohol.sa.gov.au/site/page.cfm?u=392>) targeted at males aged 18 to 39 years.

Findings showed that, while the campaign was successful in generating brand awareness (prompted recall of 87%), it did not succeed in achieving its primary aim of reducing the acceptability of public drunkenness amongst the target group (55% in 2009 agree that it is acceptable to be drunk in public, compared with 54% in 2008).

Market research confirmed the need in the next campaign:

- to include a female specific advertisement in the campaign
- to highlight serious and graphic consequences of drinking too much
- pair the campaign tagline with more graphic imagery
- develop new creative that was more impactful, relevant and motivational.

The scenarios depicted in 'Drink too much, you're asking for trouble' were chosen from a selection of approximately 10 scenarios that were focus tested with the target audience (10 focus groups involving a total of 100 people).

The 'Friends' scenario tested very well with the target audience because they could relate to the humiliation resulting from drinking too much and feared this outcome more than those consequences that they deemed less likely. At no stage during focus group testing did anyone perceive this advertisement as depicting anything other than an embarrassing scenario for the young women. The tagline, 'Drink too much, you're asking for trouble' was also focus tested with participants agreeing that this slogan fitted best with campaign scenarios depicting the serious consequences of drinking too much.

Addressing specific concerns

The issue of the relationship between sexual assault and vulnerability due to excessive alcohol consumption was explored during campaign development. Drug and Alcohol Services South Australia (DASSA) met with Yarrow Place Rape and Sexual Assault Service to seek advice on depicting scenarios that would not directly address sexual assault as part of

the campaign. Yarrow Place agreed that the 'Drink too much, you're asking for trouble' should not be coupled with a sexual assault scenario as it could be perceived as victim blaming. Hence DASSA chose not to pursue this angle. The alternative angle of exploring vulnerability to embarrassment or humiliation was therefore further developed and scripted to ensure it resonated with the target audience.

The South Australian Government advertising does not condone the attitude and behaviour of the two women in 'Friends' who humiliate a peer in potentially dangerous situation instead of assisting her. Unfortunately however, this is a common occurrence in many late night entertainment areas as is often depicted through news footage. The scene is not intended to have sinister undertones or to cause distress. The script clearly highlights the harm being experienced by this young women at the time is that of humiliation and potential ridicule by other peers.

This young woman is dressed in an outfit which reflects the typical style that a woman of her age would wear on a night out. The outfit was chosen to make the scenario as realistic as possible.

The South Australian Government takes so seriously the dangers of the type of public humiliation portrayed in 'Friends', that it is proposing to make it a criminal offence to take or upload photos for the purposes of humiliating or degrading an individual (http://www.agd.sa.gov.au/news/public_engagement/Online%20Thuggery.pdf) The 'Friends' script, including the 'Drink too much, you're asking for trouble' tagline, makes clear that the advert is about an individual's excessive alcohol consumption, not drink spiking or sexual assault, and that the 'trouble' is awkward peer relationships. Providing further context would have diluted the impact of the advertisement, which tells a powerful story in just 15 seconds. The advertisement encourages personal responsibility in regard to how much alcohol a person chooses to consume and provides a link between behaviour and consequences.

AANA Advertiser Code of Ethics

DASSA believes that the 'Drink too much, you're asking for trouble' 'Friends' advertisement is consistent with the AANA Advertiser Code of Ethics, particularly in relation to Section 2. In developing this campaign, due care has been taken to present the images in an appropriate and realistic manner, having regard for the target audience for whom the advertising is directed. The campaign materials are particularly targeted at males aged 18-39 years and females aged 18-29 years who drink alcohol regularly. Drinking at risky levels can lead to a range of harms - including health/safety, legal and social consequences. 'Friends' focuses on the social consequences of drinking too much.

AANA Code of Advertising for Children

The AANA Code of Advertising for Children states that 'advertisements to children must not portray images or events in a way that is unduly frightening or distressing to children.' This advertisement is not aimed at children, with scheduling particularly targeted around shows that females aged 18-29 and males aged 18-39 watch, and at times when these demographics are likely to be thinking about drinking alcohol, and times after alcohol has been consumed. We have also followed the advice given by the Commercials Advice Pty Ltd (CAD) by not screening the advert during any programmes targeted specifically at children.

Placement and rating

CAD rated all four advertisements in the suite as PG, which means they are able to be shown in more time slots than an MA rated advert, namely 8.30am to 4pm weekdays, 7pm to 6am weekdays and 10am to 6am at weekends. Instead of choosing specific placements for each of the four individual advertisements, the South Australia Governments master media agency, MEC, advised that the adverts be rotated evenly within time slots where there is a high viewing by the target audience of males aged 18 to 39 and females aged 18 to 29.

Feedback to date has highlighted the accuracy and personal relevance of the 'Friends' advertisement, more so than the other three advertisements in the suite. From these reports, the television advertisement has been successful in raising awareness of the issue. DASSA is also completing a comprehensive independent evaluation of the campaign to assess the effectiveness before proceeding with planned media buys in early 2012. All complaints and feedback will form part of this analysis. I note that your procedures require that all complaints about advertisements for alcohol are to be referred to the ABAC Complaints Adjudication Panel. The 'Friends' advertisement should not be confused with an advertisement for alcohol. The advertisement was developed to show a realistic negative outcome of drinking too much.

Summary

DASSA has developed a social marketing campaign around risky drinking in the community to help raise awareness of this issue and reduce harms associated with this common practice. We trust that the Advertising Standards Bureau members will support our assessment that the 15 second 'Friends' television commercial does not breach the AANA Advertiser Code of Ethics. On these grounds we request that the Advertising Standards bureau dismiss these complaints.

1 Collins T & Lapsley H (2008) The cost of tobacco, alcohol and illicit drug abuse to Australian Society in 2004-2005 Summary Version, National Drug Strategy Monograph Series No. 66. Canberra: Commonwealth Department of Health & Ageing

2 National Centre for Education and Training on Addiction (NCETA) Consortium. (2004), Alcohol and Other Drugs: A Handbook for Health Professionals. Australian Government Department of Health and Ageing.

3 Pascal ,R. Chikritzhs,T. & Jones,P. (2009). Trends in estimated alcohol attributable deaths and hospitalisations in Australia. 1996-2005. National Alcohol Indicators, Bulletin NO.12. Perth: National Drug Research Institute. Curtin University of Technology.

4 Roche.A M, Bywood,P T, Borlagdon.J. LunnaY,B, Freeman,T, Lawton,L. TovelJ,A & Nimolas,R (2007). Young People and Alcohol: The Role of Cultural Influences, National Centre for Education and Training on Addiction. South Australia

5 SA Police website [http://wyvw.sapolice.com.au/sapol/safety security/alcohol and other drugs/alcohol and crime.jsp](http://wyvw.sapolice.com.au/sapol/safety%20security/alcohol%20and%20other%20drugs/alcohol%20and%20crime.jsp)

6 South Australia Police (July 2010). Alcohol and Crime Report [http://www.sapolice.com.au/sapol/safety security/alcohol and other drugs.jsp](http://www.sapolice.com.au/sapol/safety%20security/alcohol%20and%20other%20drugs.jsp)

THE DETERMINATION

The Advertising Standards Board (“Board”) considered whether this advertisement breaches Section 2 of the Advertiser Code of Ethics (the “Code”).

The Board noted the complainant’s concerns that the advertisement suggests it is okay to laugh at someone who is drunk because they deserve it, and is offensive and upsetting to people who have come to harm as a result of excessive alcohol consumption.

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

The Board considered whether the advertisement was in breach of section 2.6 of the Code. Section 2.6 of the Code states: “Advertising or Marketing Communications shall not depict material contrary to Prevailing Community Standards on health and safety”.

The Board noted that the advertisement features a group of girls laughing at another girl who is sat on the floor next to a toilet looking very drunk, and that the tagline of the advertisement is “drink too much, you’re asking for trouble”.

The Board considered that most members of the community would find the girl’s predicament to be undignified and that this would further enforce the intended message of the advertisement that drinking too much could lead you to end up in embarrassing and/or dangerous situations.

The Board noted that the other girls in the advertisement laugh at the drunken girl and are more concerned with spreading news of her predicament than of helping her out. The Board considered this depiction showed these girls in a bad light and was in no way meant to encourage viewers to laugh at people in similar situations or to be someone in such a situation.

The Board noted the complainant’s concerns that the advertisement does not explain how the girl ended up in that situation and that she could have had her drink spiked and/or been raped or assaulted. The Board considered that whilst these issues are very serious this advertisement is concerned with the issue of excessive consumption of alcohol only and that the advertiser has clearly depicted the message of a young woman as a victim of extreme alcohol consumption in a clear and informative manner.

The Board agreed that the image of the young woman is confronting and may well be upsetting to parents and people who have suffered as a result of being in such a situation. However the Board considered that the important social message about excess alcohol consumption justified such an image.

Based on the above, the Board determined that the advertisement did not depict material contrary to prevailing community standards on health and safety and did not breach Section 2.6 of the Code.

Finding that the advertisement did not breach the Code on other grounds, the Board dismissed the complaint.

