



Ad Standards Community Panel
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AdStandards.com.au

Advertising Standards Bureau Limited
ACN 084 452 666

Case Report

1	Case Number	0166/18
2	Advertiser	The Proactiv Company
3	Product	Toiletries
4	Type of Advertisement / media	TV - Pay
5	Date of Determination	11/04/2018
6	DETERMINATION	Dismissed

ISSUES RAISED

2.6 - Health and Safety Within prevailing Community Standards

DESCRIPTION OF THE ADVERTISEMENT

This pay television advertisement features Leslie, an acne sufferer who describes her emotional journey with acne. The advertisement shows animated scenes of how the product (blackhead gel) works. The advertisement shows before and after scenes of Leslie, and scenes with the offer (25% off, 60 day money back)

THE COMPLAINT

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

The ad preys on teenage insecurities about their looks to a degree that claims their lives will be severely negatively impacted without using their product.

Specifically:

- Leslie saying "this is more emotional than I thought it would be" after discussing her breakouts;*
- the ad proclaims "clear skin stops the pain" as Leslie says she feels embarrassed and sometimes doesn't want to go out;*
- the ad proclaims "clear skin changes everything";*
- the ad implies clear skin is all you need for confidence in yourself as it switches to an*



"After" scene with Leslie.

This ad is promoting an unhealthy view of oneself to sell their product.

THE ADVERTISER'S RESPONSE

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

I refer to the complaint received regarding the Proactiv TVC, which aired on free to air TV from 1st January 2018 to 10th March 2018. Thank you for allowing us to respond. Firstly, Proactiv Skin Health Pty Ltd ("we") wishes to advise that this advertisement has not been aired since 11th March 2018 and there are no plans in place to air the TVC again in its current format. However, we welcome all feedback such as this, as this allows us to continually review our advertising and take feedback into consideration for future advertising.

We take seriously our obligation to comply with relevant advertising requirements, and we have a number of internal compliance processes in place to ensure that all of our advertising complies with relevant regulatory and social standards.

CAD approval rating and reference number: G5DR5ROA

Description of advertisement:

The TV advertisement in question is Glimpse – Leslie. The ad features Leslie, an acne sufferer who describes her emotional journey with acne. The ad then reveals the positive results Leslie experiences with Proactiv. A transcript of the ad has been attached.

Response:

Proactiv Skin Health Pty Ltd is dedicated to providing quality products for people with acne prone skin, with many of our formulations being developed by dermatologists. We take seriously our obligation to provide products that achieve the desired outcomes of clear and improved skin, in an effort to help improve the quality of life of those who use our products. Acne is one of the most prevalent skin conditions, affecting more than 85% of teenagers. (Reference 1, 2, 3) Evidence suggests that acne has a significant negative impact on the quality of life of sufferers, including lowered self-esteem, embarrassment and social avoidance behaviours. (Reference 1, 2, 4) In fact, the reduced quality of life that acne sufferers encounter has been estimated to be as great as that associated with epilepsy, asthma, diabetes or arthritis. (Reference 1,4) Additionally, there is evidence to indicate that the earlier acne is managed the better the outcomes, and scarring (both physical and emotional) is significantly reduced. (Reference 5, 6)

The Proactiv TVC in question reflects the reality that acne can have a significant emotional impact on those who suffer from the condition, as portrayed by the



testimonial from Leslie which was used in the TVC. The advertisement was not intended to prey on insecurities, but rather to help empower acne sufferers to do something about their condition. It is well documented in the medical literature, that if left untreated, acne can negatively affect a person's emotional well-being.^{1,2,5,6} Therefore, as a company which focuses on providing quality products for acne prone skin, we endeavour to help provide solutions which can in turn result in improving the emotional well-being of those who use our products.

We hold a number of statements, photographs and clips from persons who wish to share their stories and experiences after using our products (testimonials). Some testimonials describe the customer's feelings about having acne and others describe their use of the products specifically. Many wish to convey their satisfaction with the way our products helped them to clear their acne.

When the testimonials convey their testimonials or stories on camera, they are using their own words. We do not provide scripts, nor are the testimonials asked or instructed by anyone to act a particular way, or convey any particular emotion. We does not use scripts in connection with the filming of our testimonials.

In this particular advertisement, the woman featured is conveying her own personal feelings about having breakouts. She is emotional in this regard. The statements and emotions portrayed in this sequence are not atypical – we have many reports from our customers who have told us the very same thing.

The complaint asserts from what we can see an issue against the Code of Ethics section 2.6 (Health and Safety Within Prevailing Community Standards). That section of the Code restricts advertising from depicting material contrary to Prevailing Community Standards on health and safety.

We do not agree with the complainant's assertion that this advertisement promotes an unhealthy view of oneself and is contrary to the Code.

Indeed, as noted above, evidence suggests that acne has a significant negative impact on the quality of life of sufferers, including lowered self-esteem, embarrassment, social avoidance behaviours. Removing the cause of these negative impacts, has had a positive impact on this customer.

It is our view that the Prevailing Community Standards are not breached by suggesting a positive correlation between clear skin and increased self-esteem and confidence.

While we regret that the complainant perceived that this advertisement is promoting an unhealthy view of oneself, we remain of the view that this advertisement is compliant with the Code of Ethics.



As mentioned earlier, we welcome all feedback about our advertising and we can assure you that this feedback will be taken into consideration for the development of future campaigns.

Lastly, we have also reviewed the Code of Ethics section 2.1 (Discrimination and vilification), section 2.2 (Explorative or degrading), section 2.3 (Violence), section 2.4 (Sex, sexuality and nudity), section 2.5 (Language) and section 2.7 (Distinguishable advertising). We have also considered your practice note on the interpretation of the Code of Ethics. However, we cannot see that any of these sections could be potentially applicable to the complaints and have thus not provided a substantive response to each of these sections. Please advise us if you do see it differently and we will provide further details.

References:

1. Ayer & Burrows. *Postgrad Med J* 2016; 82:500 -506
2. Barnes L. et al. *Dermatol Clin* 2012; 30: 293 – 300
3. Zaenglein AL. et al. *J Am Acad Dermatol* 2016;74:945-73
4. Mallon E. et al. *British Journal of Dermatology* 1999; 140: 672 -676
5. Dawson AL, Dellavalle RP. Acne vulgaris. *Bmj*. 2013 May 8;346(7907):30-.
6. Thiboutot D, Gollnick H, Bettoli V, Dréno B, Kang S, Leyden JJ, Shalita AR, Lozada VT, Berson D, Finlay A, Goh CL. New insights into the management of acne: an update from the Global Alliance to Improve Outcomes in Acne group. *Journal of the American Academy of Dermatology*. 2009 May 31;60(5):S1-50.

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 complainant’s concerns that the advertisement preys on teenage insecurities.

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

The Panel considered whether the advertisement complied with Section 2.6 of the Code which requires that ‘Advertising or Marketing Communication shall not depict material contrary to Prevailing Community Standards on health and safety’.

The Panel noted this Pay TV advertisement features a girl named Leslie, an acne sufferer who describes her emotional journey with acne. The advertisement shows animated scenes of how the product (blackhead gel) works.

The Panel noted the complainant’s concern that the advertisement promotes an



unhealthy view of oneself in order to sell the product.

The Panel considered the advertiser's response that the advertisement was intended to help empower acne sufferers by offering solutions which can therefore improve the emotional well-being of the users of the product.

The Panel considered that the message of the advertisement was a sympathetic portrayal of a young person suffering from acne and that there was no suggestion that people who suffer from such skin conditions are lesser members of the community.

The Panel noted the advertiser's response that the Prevailing Community Standards are not breached by suggesting a positive correlation between clear skin and increased self-esteem and confidence and considered that the message of the advertisement in showing the improvements in the young girl's skin by using the promoted product, is not making a claim that individuals who do not use the product will be negatively impacted.

The Panel considered the advertisement did not portray material in a way which was 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 Panel dismissed the complaint.

