



Ad Standards Community Panel
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AdStandards.com.au

Ad Standards Limited
ACN 084 452 666

Case Report

1. Case Number :	0207-20
2. Advertiser :	RAC Insurance
3. Product :	Insurance
4. Type of Advertisement/Media :	TV - Free to Air
5. Date of Determination	8-Jul-2020
6. DETERMINATION :	Dismissed

ISSUES RAISED

AANA Code of Ethics\2.6 Health and Safety

DESCRIPTION OF ADVERTISEMENT

This television advertisement features a father and young daughter in a bathroom. The father is standing and his daughter is sitting on the vanity next to him. They both rub moisturiser into their face.

THE COMPLAINT

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

Child is positioned in an dangerous manner which completely ignores the safety of the child - it is a practice which should not be encouraged as serious injuries could occur if the child fell.

THE ADVERTISER'S RESPONSE

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

*This response is regarding the recent complaint against an RAC Insurance TVC that recently aired on Channel 9 news in Western Australia.
The advertisement features a real dad and his daughter in their family home, undertaking their nightly rituals.*



The complaint suggests the commercial shows the child positioned in a dangerous manner and that if she were to fall, serious injury could occur which could be viewed as a breach of AANA Code of Ethics 2.6 - Health and Safety\ unsafe behaviour. Below is a response to all sections of the AANA Code of Ethics.

2.1 Discrimination or Vilification: We see a father and daughter in the bathroom undertaking a routine and nothing to indicate either discrimination or vilification.

2.2 Exploitative or Degrading: We see a father and daughter in the bathroom together and nothing that could be deemed exploitative or degrading.

2.3 Violence: There is nothing that occurs during the commercial that demonstrates violence.

2.4 Sex, Sexuality + Nudity: We see a father and daughter in the bathroom – the father is applying moisturiser to his face and the daughter is mimicking the action. Both father and daughter are fully clothed with the daughter in pyjamas and the father in t-shirt and trousers.

2.5 Language: Please review attached script - there is no use of profane or indecent language at any point throughout the commercial.

2.6 Health + Safety: In the advertisement, the father is showing all reasonable care to his daughter to protect her health and safety, in line with child safety

https://raisingchildren.net.au/babies/safety/home-pets/parents-should-keep-their-children-away-from-bathrooms-when-bathing-children-1-5-years-old-2016-06-01/

recommen...
The R...
pets/...
Service...
age of...
include

- Encourage the child to stay sitting down; and
- Always keep the child within arms-reach.

In the advertisement, the child is always sitting down on the fixed bathroom vanity. She is in the presence of her father, who is standing in front slightly to the right of the child. The father is supervising his daughter the entire time, keeping her within his sight.

The child is always within arms-reach of her father, and is never left unattended. The father shows multiple touch contacts with his daughter throughout the advertisement, which demonstrates his ability to respond quickly to prevent danger. Toward the end of the advertisement (22 second mark), the father says 'careful' and repositions the child, so she is sitting further back on the vanity. This shows that the father is taking reasonable care whilst with his daughter in line with child safety recommendations, while also reinforcing safety awareness with her.

The Raising Children website also has the below recommendation for preventing falls in children under the age of 5.



- *The lower the height, the lower the danger. Children under five years shouldn't have access to heights over 1.5 m*

We confirm that the bathroom vanity in the commercial does not exceed 1.5 metres in height, and is therefore compliant with the child safety recommendation.

2.7 Distinguishable as Advertising: As per attached script, the dialogue spoken in the advert is referencing local home insurance that is there for you. There is also an end frame sequence bearing the RAC Insurance logo at the conclusion of the commercial.

For these reasons, we do not believe that the advertisement has breached Section 2 of the Code in any way.

In particular, we do not believe that section 2.6 (Health and Safety – unsafe behaviour) has been breached, as the actions shown in the advertisement comply with child safety recommendations that have been endorsed by the Australian Government Department of Social Services.

THE DETERMINATION

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

The Panel noted the complainant's concern that the advertisement promotes unsafe behaviour.

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. 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 Panel noted the complainant's concern that the advertisement depicts the child dangerously positioned and such behaviour should not be encouraged as serious injuries could occur if the child were to fall.

The Panel noted the advertiser's response that the behaviour shown in the advertisement was consistent with recommendations for preventing bathroom falls in children, specifically that the child was sitting down, was within arms reach of her father and was not on a surface higher than 1.5 meters.

The Panel considered that the child in the advertisement did not appear unsafe or as though she was about to fall. The Panel considered that during the advertisement the father is seen to keep a close eye on his daughter, and at one point he readjusts her seating position to ensure she is seated far enough back on the sink.



The Panel considered that the behaviour in the advertisement was a depiction of common household practices and noting that the father was in close proximity to the young girl and watched her at all times the Panel considered that it was not a depiction which most members of the community would consider unsafe.

The Panel considered that the advertisement did not contain material which would be contrary to Prevailing Community Standards on health and determined that it did not breach Section 2.6 of the Code.

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