



**Ad Standards** Community Panel  
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**AdStandards.com.au**

Ad Standards Limited  
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## Case Report

<b>1. Case Number :</b>	<b>0289-19</b>
<b>2. Advertiser :</b>	<b>Roadshow Films</b>
<b>3. Product :</b>	<b>Entertainment</b>
<b>4. Type of Advertisement/Media :</b>	<b>TV - Free to Air</b>
<b>5. Date of Determination</b>	<b>11-Sep-2019</b>
<b>6. DETERMINATION :</b>	<b>Dismissed</b>

### ISSUES RAISED

AANA Code of Ethics\2.3 Violence  
AANA Code of Ethics\2.0 Other

### DESCRIPTION OF ADVERTISEMENT

There are eight versions of this television advertisement promoting IT Chapter 2.

Version One features a voice saying, “for 27 years I dreamt of you, I missed you, I missed you, I missed you” and:

- A group of adults looking into the reflection of a shop window showing a group of children
- A young boy looking into a stormwater drain, replaced by an adult male
- Children’s hands holding a paper boat appearing from the drain
- A man saying “we didn’t stop it”.
- A man approaching a young boy in a mirror maze, the lights flicker and the clown Pennywise appeared
- Adults in a cave shield their face from a bright light
- Pennywise the clown floats through the air holding a bunch of red balloons
- A young boy is lying on the ground screaming
- Pennywise the clown jumps into the air
- A door at the end of a dark corridor opens revealing a man crouched in a room
- A boy watches as the man turns around
- The man is wearing white face paint and his face is bleeding from cuts around his eyes and mouth
- Information about the movie and a voice over saying “It Chapter Two In cinemas September 5”.



Version Two features a voice saying, “for 27 years I missed you, missed you, missed you” and:

- A group of adults looking into the reflection of a shop window showing a group of children
- Children’s hands holding a paper boat appearing from a dark drain
- A man approaching a young boy in a mirror maze, the lights flicker and the clown Pennywise appeared
- Pennywise the clown floats through the air holding a bunch of red balloons
- A man’s face in the dark appears to be screaming
- A man wearing white face paint and his face is bleeding from cuts around his eyes and mouth laughs
- Information about the movie and a voice over saying “It Chapter Two In cinemas September 5”.

Version Three features a young boy’s voice saying, “everyone has two kinds of memories, the ones you show off that you’re proud of and the ones you hide in places so dark they’re the hardest to walk away from.” And:

- A group of children riding bikes
- A teenage boy and girl embracing replaced by a man and woman embracing
- A young boy looking into a stormwater drain, replaced by an adult male
- A child’s hands appear from the drain holding a paper boat
- A man says “there’s more to our story, what happened that summer. We didn’t stop it.”
- A series of children’s faces are shown followed by them as adults
- A red balloon floats past a window and a laughing man watches it as he is being carried by a doctor
- A man in a fun house
- A woman saying, “it consumes us from the inside until we don’t have a choice anymore”.
- A large number of floating red balloons
- A shouting man being held back by other men
- People running surrounded by flying objects
- An adult male saying, “losers stick together”
- Information about the movie and a voice over saying “It Chapter Two In cinemas September 5”.

Version Four features a young boy’s voice saying, “everyone has two kinds of memories, the ones you show off that you’re proud of and the ones you hide in places so dark they’re the hardest to walk away from.” And:

- A group of children riding bikes
- A teenage boy and girl embracing replaced by a man and woman embracing
- A young boy looking into a stormwater drain, replaced by an adult male
- A child’s hands appear from the drain holding a paper boat
- A group of adults are in a circle holding hands looking up
- Someone runs through the hallway of a school



- Information about the movie and a voice over saying “It Chapter Two In cinemas Thursday”.

Version Five features a young boy’s voice saying, “everyone has two kinds of memories, the ones you show off that you’re proud of and the ones you hide in places so dark they’re the hardest to walk away from.” And:

- A group of children riding bikes
- A teenage boy and girl embracing replaced by a man and woman embracing
- A young boy looking into a stormwater drain, replaced by an adult male
- A child’s hands appear from the drain holding a paper boat
- A voice says, ‘did you miss me’
- Someone is shown falling down a long shaft
- Information about the movie and a voice over saying “It Chapter Two In cinemas September 5”.

Version Six features a boy’s voice saying, “We’re losers, and we always will be.” and:

- A group of children riding bikes
- A group of young children standing, replaced by a group of adults standing
- A child’s hands appear from the drain holding a paper boat
- A large number of floating red balloons
- A group of adults are in a circle holding hands looking up
- A woman covered in oil-like substance screams
- People running surrounded by flying objects
- A man wearing white face paint and his face is bleeding from cuts around his eyes and mouth laughs
- A man runs through a fairground
- A man says, ‘losers stick together’.
- A group of adults looking into the reflection of a shop window showing a group of children
- Information about the movie and a voice over saying “It Chapter Two In cinemas Thursday”.

Version Seven features a young boy’s voice saying, “everyone has two kinds of memories, the ones you show off that you’re proud of and the ones you hide in places so dark they’re the hardest to walk away from.” And:

- A teenage boy and girl embracing replaced by a man and woman embracing
- A young boy looking into a stormwater drain, replaced by an adult male
- A child’s hands appear from the drain holding a paper boat
- A group of adults are in a circle holding hands looking up
- Someone running through a school corridor
- Information about the movie and a voice over saying “It Chapter Two In cinemas Thursday”.

Version Eight features the voice of Pennywise the clown saying, “Play a game with me wouldya, on the count of three” and:

- A fairground
- Pennywise’s face appearing from the dark



- A young girl facing him
- Pennywise saying “one”
- Shot of a man running through a spinning tunnel at the fair ground
- Floating balloons and a man looking scared
- Pennywise saying “two”
- An upset woman sliding down the wall of a toilet cubicle
- A child’s hands appear from the drain holding a paper boat
- A person struggles to swim in an oil-like substance
- Pennywise’s face
- The young girl smiling and moving towards him
- Pennywise’s mouth enlarges to reveal hundreds of teeth
- Information about the movie and a voice over saying “It Chapter Two In cinemas Thursday”.

#### **THE COMPLAINT**

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

*The advertisement displays the main protagonist bleeding profusely in a line from its mouth to its forehead at the end of the ad. The main character is also shown laughing in a creepy manner towards the Tv screen. The whole advertisement shows scenes of horror from the film which in my opinion was extremely disturbing.*

*They were advertising it the movie and my children all saw it. They were terrified, it was extremely violent blood and gore and very scary movie it had no place being advertised on free to air tv*

*My 6 year old son was watching the AFL broadcast with us. He asked me why the scary clown movie was on. I do not believe a movie with a MA15+ rating should be allowed to be shown during primetime television (7:38pm on Friday night)*

*An ad for a horror movie should not be shown at 7.45pm during a family television show (Survivor). It is frightening for young children.*

#### **THE ADVERTISER’S RESPONSE**

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

*The creative contains no discriminatory material, strong or obscene language, nudity, no material contrary to health and safety standards - however does depict violence and contains scary/ supernatural themes which are relevant to the film being advertised and accordingly unavoidable.*



*The creative is also clearly tagged with the In Cinemas/ Release date and classification logo which helps to distinguish this as an advertisement for a film and helps to distinguish the characters a fictional.*

## **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 complainants' concerns that the advertisement:  
Features extremely disturbing scenes from a horror movie  
Was extremely violent with blood and gore  
Advertised an adult rated movie during children's viewing time  
Is frightening to children

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

The Panel noted there were eight versions of this television advertisement promoting the movie 'It Chapter Two'.

The Panel noted the complainants' concerns that it is inappropriate to advertise a movie rated for adults to a child audience.

The Panel noted that Versions Three, Five and Seven of the advertisement had received a 'J' rating from ClearAds, meaning that they "May be broadcast at any time of day, except during P and C programs or adjacent to P or C periods. Exercise care when placing in programs principally directed to children."  
(<https://www.clearads.com.au/storage/clearads-handbook-edition-8-2.pdf>)

The Panel noted that Versions Four and Six of the advertisement had received an 'M' rating from ClearAds, meaning that they "May be broadcast during the following hours, except during P and C programs or adjacent to P or C periods: Weekdays ( schooldays): 7.30pm – 6.00am and 12 noon - 3.00pm (see Note 1). Public Holidays, weekdays (school holidays) & Weekends: 7.30pm – 6.00am. In addition to the time restrictions, a Commercial classified "M" must NOT be shown: Between 5.00 am – 6.00 am and 7.30 pm - 8.30 pm during a Sports Program, or a Program classified G or PG; and Before 9.30 pm during Sports Programs and Films classified G or PG which commence before 8.30 pm and continue after 8.30 pm (unless it is a Film which is neither promoted to Children nor likely to attract a substantial Child audience)."

The Panel noted that Versions One, Two and Eight of the advertisement had received an 'A' rating from ClearAds, meaning that they "May be broadcast between 8.30pm and 5.00am on any day. In addition to the time restrictions, a Commercial classified "A" must NOT be shown: Before 9.30 pm during Sports Programs and Films classified G or PG which commence before 8.30pm and continue after 8.30 pm (unless it is a



Film which is neither promoted to Children nor likely to attract a substantial Child audience).”

The Panel acknowledged that some members of the community would prefer for this type of product not to be advertised at a time when children are likely to see it, however considered that this product is legally able to be advertised in a public space and was played at times consistent with its rating.

The Panel noted the complainants’ concerns that the advertisement features extremely disturbing scenes from a horror movie, including violent images of blood and gore and could frighten younger viewers.

The Panel considered whether the advertisement was in breach of Section 2.3 of the Code. Section 2.3 states: "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 that the Practice Note for the Code states:  
“The Community Panel has also found that a strong suggestion of menace presents violence in an unacceptable manner and breaches this section of the Code.”

The Panel considered Version One of the advertisement.

The Panel considered that the majority of the scenes in the first advertisement were menacing, rather than violent. The Panel considered that the scenes were fleeting in nature and that many of the scenes, such as the depiction of red balloons and the depiction of Pennywise the clown would require prior knowledge of the series for context. The Panel noted the final scene in the advertisement which featured the man’s bleeding face and considered that this image was violent and could be alarming to some viewers. The Panel considered that the fleeting depiction of a violent scene from the movie was justifiable in the context of an A-rated advertisement for a horror movie and did not breach Section 2.3 of the Code.

The Panel considered the Version Two of the advertisement.

The Panel considered that this version of the advertisement was a cut-down version of the first advertisement, which featured the final scene of the man’s bleeding face. Consistent with the determination above, the Panel considered that the fleeting depiction of a violent scene from the movie was justifiable in the context of an A-rated advertisement for a horror movie and did not breach Section 2.3 of the Code.

The Panel considered Version Three of the advertisement.

The Panel noted that the scenes were fleeting and that there was no blood or gore in this version of the advertisement. The Panel considered that most scenes in this version of the advertisement would be considered suspenseful, rather than violent.



The Panel considered the music, sound effects and dialogue added to the suspenseful tone of the advertisement.

Overall, the Panel's considered that the tone of this version of the advertisement was suspenseful and frightening, however did not contain overt violence. The Panel considered that the level of menace was not excessive in the context of an advertisement for a horror movie. In the Panel's view the menace portrayed in Version Three of the advertisement was justifiable in the context of the product advertised and did not breach Section 2.3 of the Code.

The Panel considered Version Four of the advertisement.

The Panel considered that this version of the advertisement was a cut-down version of the third advertisement, which did not feature blood or gore and was suspenseful rather than violent. Consistent with the determination above, in the Panel's view the menace portrayed in Version Four of the advertisement was justifiable in the context of the product advertised and did not breach Section 2.3 of the Code.

The Panel considered Version Five of the advertisement.

The Panel considered that this version of the advertisement was also a cut-down version of the third advertisement, which did not feature blood or gore and was suspenseful rather than violent. Consistent with the determination above, in the Panel's view the menace portrayed in Version Five of the advertisement was justifiable in the context of the product advertised and did not breach Section 2.3 of the Code.

The Panel considered Version Six of the advertisement.

The Panel considered that the majority of the scenes in this version of the advertisement were menacing, rather than violent. The Panel considered that the scenes were fleeting in nature and that many of the scenes, such as the depiction of red balloons and the depiction of Pennywise the clown would require prior knowledge of the series for context. The Panel noted the scene in the advertisement which featured the man's bleeding face and considered that this image was violent and could be alarming to some viewers. The Panel also noted the scene with the woman covered in a red oil-like substance and considered that the substance did look like blood. The Panel considered that the depiction of a woman covered in blood would also constitute violence. The Panel considered that the fleeting depiction of two violent scenes from the movie was justifiable in the context of an M-rated advertisement for a horror movie and did not breach Section 2.3 of the Code.

The Panel considered Version Seven of the advertisement.

The Panel considered that this version of the advertisement was identical to Version Four, with a different date provided at the end of the advertisement. Consistent with the determination above, in the Panel's view the menace portrayed in Version Four of



the advertisement was justifiable in the context of the product advertised and did not breach Section 2.3 of the Code.

The Panel considered Version Eight of the advertisement.

The Panel considered that this version of the advertisement did contain a high level of menace, with the clown counting to two before suddenly opening his mouth to reveal a large number of teeth. The Panel considered that the depiction of the young girl with blood on her face, facing the clown in this version of the advertisement did create the impression that the girl was in danger, and considered that this level of threat and danger would constitute violence. The Panel considered that the use of scenes from the movie and the menace portrayed was justifiable in the context of an A-rated advertisement for a horror movie and did not breach Section 2.3 of the Code.

Finding that the advertisement did not breach the Code on other grounds, the Panel dismissed the complaints.