



Ad Standards Community Panel
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Case Report

1. Case Number :	0302-19
2. Advertiser :	Roadshow Films
3. Product :	Entertainment
4. Type of Advertisement/Media :	Outdoor
5. Date of Determination	25-Sep-2019
6. DETERMINATION :	Upheld – Modified or Discontinued

ISSUES RAISED

AANA Code of Ethics\2.3 Violence

DESCRIPTION OF ADVERTISEMENT

This advertisement has two versions. One features a white face with red lines running down over the eyes and covering the mouth. The other features only the eyes.

THE COMPLAINT

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

Surely there is a standard in our community regarding horror movies and their advertisement around areas of vulnerability, such as a school. One is not permitted to advertise MA15 tv or movies during children's viewing hours, I would hope this would be the same regarding these kinds of public advertisements.

My 3 young children, aged 9, 7, and 5 drive past this every day. None of them like it, one of them is completely scared by it, and it has disrupting her ability to sleep. This young girl who is otherwise robust, healthy, and do I dare say 'resilient' is now battling to not have this image in her head. It can happen to any child. Children are not supposed to be witness to this kind of material. It is too confronting for their young, underdeveloped brains.



As a clinical psychologist it is imperative that as a community we protect our children from material that they cannot developmentally understand let alone mentally digest. Children are not able to tell the difference between reality and imagination. It is not enough that we as parents just encourage them to 'ignore it' or try to have them believe that 'its not real'. They simply cannot developmentally do this.

As a community we should be more concerned about children's psychological safety.

I could cite modern clinical knowledge and expertise and research, but Socrates said it clearly so very long ago:

"And shall we just carelessly allow children to hear any casual tales which may be devised by casual persons, and to receive into their minds ideas for the most part the very opposite of those which we should wish them to have when they are grown up?

We cannot.

Then the first thing will be to establish a censorship of the writers of fiction, and let the censors receive any tale of fiction which is good, and reject the bad; and we will desire mothers and nurses to tell their children the authorised ones only. Let them fashion the mind with such tales, even more fondly than they mould the body with their hands; but most of those which are now in use must be discarded."

If there is a law to prohibit the advertisement of scary, mature, or horror films, please can you enforce this. This is my first complaint. It is not the first time I have seen a poster or an image on a bus that I've had concerns about and had to talk to my children about. But a horror movies is too much.

If there is no law prohibiting this, please can you tell me, as a psychologist and as a mother, how do we get this looked at?

Unsuitable for display at under-18 locations (i.e. in the general public domain). Currently it is displayed in full sight of small children.

THE ADVERTISER'S RESPONSE

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

The outdoor creative contains no discriminatory material, strong or obscene language, nudity, no material contrary to health and safety standards. It also does not depict violence but does contain scary/ supernatural themes which is relevant to the movie being advertised and accordingly unavoidable.

The creative was approved by the outdoor companies prior to printing and caution was taken in order to avoid placements within 300m of schools.



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 was too scary to be displayed where children could see it, and that the advertisement had caused distress to children.

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

The Panel noted that there are two versions of this advertisement.

Version One features a white face with red painted lines running down over the eyes and connecting to the mouth, with three streaks under the mouth/dripping from the mouth.

Version Two features the upper half of a face with only the eyes visible, and red lines running vertically through the eyes.

The Panel considered whether the advertisements were 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 the complainants' concerns that the advertisement was too scary to be displayed where children could see it, and that the advertisement had caused distress to children.

The Panel acknowledged that it can be challenging to create advertisements for films with a high degree of violence or menace that comply with the terms of the Code. The Panel noted that advertisers are free to select any artwork for use in advertisements, however noted that advertisers must take care to ensure that such imagery is justifiable in the context of the product and is suitable for a broad audience that may include children.

The Panel noted the Practice Note for Section 2.3 of the Code which states "a strong suggestion of menace presents violence in an unacceptable manner and breaches this section of the Code. "

The Panel first considered Version One of the advertisement.

The minority of the Panel considered that the face in the advertisement was not interacting with anything and considered that there was no actual violence depicted. The minority considered that the large size of the advertisement did add to the impact of the images. The minority considered that the theme of the advertisement and the imagery of the mouth and blood dripping combined to give the advertisement a



menacing tone, however considered that this sense of menace was not excessive or disproportionate.

The minority of the Panel considered that the low level of menace was justifiable in the context of an advertisement for a horror movie. The minority acknowledged that some children and others viewing the advertisement in an outdoor format may be frightened by the menacing images but considered that these images did not constitute a portrayal of violence that would breach community standards.

The majority of the Panel noted that this advertisement was for a film classified MA15+. The majority noted that the main character in this film is an evil clown that eats children. The majority noted that the character was introduced in the first film of the series, and that the film series is based on a well-known novel by Stephen King. The majority considered that many people are familiar with the concept of the “IT” films, even if they had not actually seen the original movie.

The majority of the Panel noted that an advertisement for a horror film had been considered in case 0391-18, in which:

“The Panel considered that the advertisement did not depict blood, gore, or any material of a graphic nature. The Panel considered that there was no blood or gore in the advertisement, and no threat or implication of a violent act. The Panel considered that while some people may find the image of the nun with the yellow eye to be alarming, it was not threatening and did not contain a strong suggestion of menace.”

The majority of the Panel considered that in this case, while children may be unaware of the film series or the character, the advertisement depicting a face with yellow eyes, stained and damaged teeth within an unsettling smile and a clear image of blood dripping from its mouth, was excessively menacing. The majority considered that the image selected to represent the main character from the horror movie had a strong implication that the clown had eaten someone, based on the depiction of blood dripping from its mouth.

The majority of the Panel noted that the series of television advertisements for this film had been dismissed in case 0289-19. In considering complaints about the single image of the main character used in this outdoor advertisement, the majority considered that the direct gaze of the eyes and the menacing image of the character was more impactful due to the static nature of the advertisement. The majority considered that in the context of this horror movie promotion, the static image has less context than a television advertisement, and there is no opportunity for less threatening imagery to balance the sinister and frightening nature of the depicted face of the central character.

The majority of the Panel acknowledged that some level of violence and menace is justifiable in the context of advertising a horror movie, however considered that the level of menace in this advertisement exceeded the amount which most members of the community would consider to be appropriate.



Overall, the majority of the Panel considered that Version One of the advertisement, in the context of a outdoor advertisement visible to a broad audience, portrayed a level of violence that was not justifiable in the context of promoting a horror movie and did breach Section 2.3 of the Code.

The Panel then considered Version Two of the advertisement.

The Panel considered that the only imagery in this advertisement is two yellow eyes with a red vertical line running over them. The Panel considered that this version does not depict the character's mouth and associated imagery of blood dripping towards the chin, and that without this imagery the overall impression of the advertisement is far less menacing or threatening than Version One of the advertisement.

The Panel acknowledged that some children and others viewing the advertisement in an outdoor format may be frightened by the image but considered that the image did not constitute a portrayal of menace or violence that would breach community standards and in the Panel's view the menacing tone was justifiable in the context of the product advertised and did not breach Section 2.3 of the Code.

Finding that Version One of this advertisement did breach Section 2.3 of the Code the Panel upheld the complaints.

THE ADVERTISER'S RESPONSE TO DETERMINATION

Our campaign for IT 2 is now over, so all outdoor creative has been removed.