Ad Standards

MEASURING OUR IMPACT

REVIEW OF OPERATIONS 2020

Contents

Ad Standards

Ad Standards delivers a national system of advertising complaints adjudication, giving members of the public a voice to express their concerns about advertising content. The system guarantees independent adjudication of complaints by the Ad Standards Community Panel.

The Ad Standards team supports the Ad Standards Community Panel and the Ad Standards Industry Jury which independently determine consumer and competitor complaints against the advertising self-regulatory Codes.

We also work actively with advertisers and provide education and resources to guide industry in producing responsible advertising that aligns with prevailing Australian values and standards, protecting the advertiser's brand integrity and brand value as well as our community.

Ad Standards provides an online Copy Advice Service and other resources for all advertisers and agencies to get expert advice in advance of broadcast or publication. The service supports businesses to help ensure advertising complies with the Codes regulating advertising content in Australia.

You can find out more about Ad Standards online at **AdStandards**.com.au.

Who we are

Ad Standards

Ad Standards administers Australia's national system of advertising self-regulation for both the general public and competitors. There are seven members of staff at Ad Standards.

Corporate

Ad Standards Board

The Board governs Ad Standards in accordance with the objectives set out in its Constitution to develop and monitor delivery of the strategic direction of Ad Standards. There are six Directors on the Board.

Regulation

Ad Standards Community Panel

The Ad Standards Community Panel is the decision-maker. It determines whether advertisements meet the requirements of the AANA Code of Ethics and other industry Codes. There are 21 community representatives on the Community Panel.

Ad Standards Industry Jury

Ad Standards' Industry Jury provides a competitor complaint resolution service for advertisers in Australia.

Education & Advice

Ad Standards Education and Advice

Ad Standards provides an online Copy Advice Service and resources, as well as tailored face-to-face training on the Codes regulating advertising content, to advertisers, agencies and business. Ad Standards also provides input to tertiary institutions teaching related courses.

AANA

The Australian Association of National Advertisers (AANA) is responsible for the AANA Advertiser Codes which are administered by Ad Standards.

AFGC

The Australian Food and Grocery Council (AFGC) is responsible for the *Responsible Children's Marketing Initiative (RCMI) of the Food and Beverage Industry* and the *Quick Service Restaurant Initiative (QSRI) for Responsible Advertising and Marketing to Children.*

Since 1 July 2020 the AANA has been responsible for the management of the RCMI and the QSRI.

Complaints under both initiatives are managed by Ad Standards.

ABAC

The ABAC Scheme administers the ABAC *Responsible Alcohol Marketing Code* (ABAC) which is the quasi-regulatory code for alcohol advertising and packaging. All complaints about alcohol advertising are received by Ad Standards and forwarded to ABAC for consideration by the ABAC Complaints Panel.

Some complaints about alcohol advertising will also be considered by the Ad Standards Community Panel.

FCAI

The Federal Chamber of Automotive Industries (FCAI) is responsible for the *FCAI Voluntary Code of Practice for Motor Vehicle Advertising* which is administered by Ad Standards.

The year in review

	2019	2020
COMPLAINT SNAPSHOT		
Complaints received	**5,241**	**3,514**
Complaints within Ad Standards' jurisdiction	2,083	1,107
Complaints about ads previously considered	999	588
Complaints outside Ad Standards' jurisdiction	1,642	1,168
Complaints about ads already withdrawn	69	74
Complaints assessed as consistently dismissed issues	448	577
CASE SNAPSHOT		
Cases raised	**415**	**392**
Cases considered by the Ad Standards Community Panel	368	353
Cases created but not considered by the Community Panel [1]	47	39
BREACH OR NOT SNAPSHOT		
Cases – complaints dismissed	310	284
Number of complaints about dismissed cases	2,523	999
Cases – complaints upheld [2]	58	69
Number of complaints about upheld cases	208	108

1 In 2020, this includes the combined number of ads voluntarily withdrawn by the advertiser before the Ad Standards Community Panel meeting (31), and cases created but not put forward for Community Panel consideration for various other reasons (8).

2 In 2020, this includes 19 advertisements that were not modified or removed by the advertiser after determination by the Community Panel. Of these, nine were online or in-App advertisements with eight of these originating from overseas. The other 10 were from two advertisers.

3,514
COMPLAINTS RECEIVED

353
CASES CONSIDERED BY THE COMMUNITY PANEL

22
COMMUNITY PANEL MEETINGS TO CONSIDER CASES

THE TOP FIVE ISSUES THAT PEOPLE COMPLAINED ABOUT IN 2020 WERE COVERED BY THE AANA CODE OF ETHICS

- Sex, sexuality and nudity **32.29%**
- Exploitative or degrading **18.29%**
- Discrimination or vilification **15.43%**
- Violence **10.29%**
- Health and safety **7.96%**

THE MOST COMPLAINED ABOUT PRODUCT CATEGORIES IN 2020

- Food and beverages **22.23%**
- Automotive **9.79%**
- Health products **7.91%**
- Community awareness **6.43%**
- Alcohol **5.75%**

For all complaints statistics see the section *Measuring our impact* which starts on page 17.

COMMUNITY AND ADVERTISER ENGAGEMENT AND AWARENESS

TWITTER

Followers
▲**18.4%** from 2019

Total impressions
64,960

1. 

2. 

3. 

LINKEDIN

Followers
▲**69%** from 2019

Total impressions
6,002

1. 

2. 

3. 

DIGITAL

TOP FIVE PAGES VIEWED

1. Homepage
2. Lodge a complaint
3. Cases
4. Codes and initiatives
5. Political and election advertising

106,063 users
Over **282,000** page views

BULLETIN

17 campaigns sent
1,342 recipients
24.6% open rate

1. 

2. 

From the Chair

It goes without saying that 2020 has been an extraordinary year. I feel a great sense of pride in what Ad Standards has achieved, continuing to build engagement as the trusted voice for community concerns about advertising content.

I am very pleased to welcome our new Executive Director, Richard Bean, who was appointed by the Board in August and has provided outstanding leadership and support through a global pandemic and a time of significant change for the Ad Standards team.

As a former Deputy Chair and acting Chair of the Australian Communications and Media Authority (ACMA), Richard has a strong regulatory background in communications and is very familiar with the important role that Ad Standards undertakes in ensuring that advertising content meets community standards.

I would like to thank Fiona Jolly, Ad Standards' CEO of nearly 15 years, who stepped down in 2020. With Fiona's leadership, the advertising complaints system in Australia received global recognition for effectiveness, as well as recognition of Ad Standards' commitment to advancing the role and integrity of advertising self-regulation.

Like every other organisation, we faced substantial challenges in 2020 as business operations, work routines, and social structures were disrupted. We have had to adapt to reduced revenue, revise business priorities, and shift our focus and resources so that we could continue to deliver an effective and independent advertising complaint adjudication system for the community and advertisers.

The decision to move away from dual boards at both Ad Standards and the Australian Association of National Advertisers (AANA) was made to reduce unnecessary cost and complexity in the self-regulatory system, particularly given the impact of COVID-19 on advertising spend and therefore levy revenue.

I thank my fellow Ad Standards Board members and our wider industry partners for their support of this change and their commitment and determination to help maintain an appropriately funded and sustainable system of advertising self-regulation, which will be achieved through this merger.

As a self-regulatory system we rely on the support of the Media Federation of Australia, advertisers and the broader media industry to be successful. There is a shared recognition that decent and honest advertising is good for business and the wider community and we look forward to continued success, with their ongoing support.

My thanks to the members of the Ad Standards Community Panel. Their continued engagement in a tough year, the diversity of opinion they reflect and robust conversations they are prepared to have are what makes Australia's system of advertising complaints adjudication strong.

In closing, I pay tribute to our dedicated team members. The last year has thrown up enormous and unique challenges to all of them and they have responded in a truly outstanding way, with great dedication and effort.

This is my last report as Chair of the Ad Standards Board and it has been a privilege and an honour to have served. Thank you to my fellow Board members Vince Meoli, Lisa Ronson, Wayne Gabriel, Jenni Dill and Kirsty Muddle for their vision, strategic thinking, and great good humour which I have very much appreciated.

I wish the AANA Board all the best as we look forward to the next phase of advertising self-regulation, and know I leave Ad Standards in good hands.

David Scribner
Chair

From the Executive Director

It is my pleasure to deliver this review of the performance of Ad Standards in 2020.

What we've demonstrated through the challenges of 2020 is that we remain strong and stable, delivering for our community a world-class system of advertising self-regulation that gives citizens and consumers a voice to express their concerns about advertising content, with the guarantee of independent adjudication of complaints by the Ad Standards Community Panel.

More than ever, our achievements are testament to the contribution of the Community Panel representing the diversity of the Australian community and Australian community standards, and to the dedication of our committed team members.

The impact of the global pandemic can be seen in a reduction in complaints lodged with Ad Standards in 2020 in comparison to 2019, although a greater proportion gave rise to cases considered by the Community Panel.

The MFA Industry Census for 2020 shows a significant reduction in advertising spend and placement resulting in fewer ads in the marketplace.

Reduced ad spend also significantly affected levy collection and therefore our operating budget. When COVID-19 hit we took immediate action to prioritise the health and wellbeing of our people – and then moved quickly to reduce operating expenses and defer all non-essential expenditure. My thanks in particular to our General Manager Brian Gordon for his work during that period.

We provided advice to advertisers about the need to ensure that advertising content aligned with current community standards and Australian Government health guidelines. We also took a pragmatic regulatory approach to complaints, recognising that many ads were created before the pandemic. See the full story on page 15.

Changes to the governance structures of Ad Standards and the Australian Association of National Advertisers (AANA) were announced mid-year. This followed consultation with a wide range of stakeholders, with advertisers in particular indicating their determination to maintain an appropriately funded system of advertising self-regulation.

We also worked hard to prioritise what we could deliver in our strategic plan given our significantly reduced budget. Some activities such as research and further development of our IT systems were put on hold. We will revisit these, and indeed our strategic plan itself, as advertising spend and levy collection pick up.

In the face of these challenges, we continued to provide our community with a voice for their concerns and achieved a number of important milestones.

Through the first quarter of 2020 we continued to build on the 'kinder conditions' awareness campaign thanks to the pro bono placement support of our media industry partners. Our ongoing communications focus was to drive digital engagement across stakeholder groups to maximise reach and cost-effectiveness. These results are featured on page 5.

We provided extensive input to a major public review of the AANA Code of Ethics and Practice Note which was announced in September and came into effect on the first of February 2021. The updates give clearer guidance to advertisers across a range of issues including gender stereotyping and the use of overtly sexualised imagery.

These strengthened provisions will now be applied by the Ad Standards Community Panel when adjudicating complaints about advertising content.

The 2020 Code review also resulted in significant changes to the rules about distinguishable advertising on social media. Influencers now have an explicit and positive obligation to disclose any arrangements they have with brand owners, in a manner that can be easily understood by consumers - using obvious hashtags like #Ad or #PaidPartnership, rather than simply tagging the advertiser or thanking them in their posts.

Six new community representatives were recruited to the Community Panel last year and commenced in January 2021.

Sincere thanks to the retiring Community Panel members. All of us at Ad Standards are grateful for the different perspectives you brought to every meeting, your intellect, your insights, and your commitment to serving the Australian community. Read more about the Community Panel on page 9.

Thank you also to every one of my fellow employees whose efforts have made our achievements this year possible. I'm especially grateful for your support in my first months as Executive Director, and I acknowledge the strong foundations we have moving into 2021.

As much as 2020 has been about changing and adapting, we remain focused on delivering our long-term strategies of expanding our copy advice service, continuing to improve our complaints handling procedures, and building relationships across sectors to ensure responsible advertising which benefits brands and the wider community.

Thank you to our industry partners in the media, media buying, creative and regulatory sectors, for their contribution to the success of the advertising self-regulation system.

To David Scribner and the rest of the Ad Standards Board, I have very much appreciated your support and counsel during a highly unusual year. Thanks too to the Chair, Board, CEO and staff of the AANA. I look forward to working with the new Board to meet the challenges and opportunities that 2021 holds.

Richard Bean
Executive Director

Six new Ad Standards Community Panel members

The new community representatives recruited to the Ad Standards Community Panel in 2020 reflect our ongoing commitment to representing Australia's diversity.

The six new members represent a broad range of community values, geographic locations and demographic groups and include a food and nutrition expert, university student and church volunteer, Aboriginal community leader and advocate, CEO of a non-profit organisation, police officer, and a gender expert and author.

The Community Panel is a body of community representatives responsible for adjudicating complaints made by members of the public about the content of advertisements. The Panel considers complaints under the advertising Codes and Initiatives and in line with prevailing community standards in Australia. Panel members are not subject to direction by Ad Standards management or the Board.

Panel members are recruited through a rigorous public recruitment process and are directly involved with their communities.

New appointments are staggered to ensure the Community Panel retains experience while introducing new people with a mix of experience, views and skills from time to time. Our goal is to bring together a group of people which, as a whole, is able to reflect the wide diversity of Australians, the Australian community and community opinion.

The Panel provides consumers with assurance that advertisements are legal, decent, honest and truthful and also provides advertisers with a valuable guide to community standards.

The diversity of background and opinion within the Community Panel is essential to ensuring the advertising complaints process administered by Ad Standards reflects community standards.

We sincerely thank retiring Panel members Fiona Giles, Karen Haynes, Peter Phillips, Julian Ridgers, Carly Wallace, Craig White, and Peter Williams OAM for their dedication and commitment.

We also thank all Panel members for their tenacity and good humour as we worked through the logistics of meeting by video conference during a global pandemic. Thank you for your contribution to robust discussion, insights and perspectives, and your commitment to continuing to serve the Australian community.

The full list of the 21 current Community Panel members and their biographies is online at **AdStandards**.com.au.

The Ad Standards Community Panel includes people from a broad range of age groups and backgrounds. The Panel is gender-balanced and representative of the diversity of Australian society.

Copy advice service continued during COVID-19

Throughout 2020 we continued to provide advertisers with expert and confidential pre-campaign advice through the Ad Standards Copy Advice Service.

The number of overall requests for copy advice was low in 2020 and reflects anecdotal reports of fewer new advertisements being produced during the pandemic.

In total we provided expert advice about 28 campaigns from a wide range of advertisers and industry bodies. The majority of potential issues raised related to the AANA Code of Ethics, with advertisers specifically seeking guidance on Health and safety (Section 2.6), and Discrimination or vilification (Section 2.1).

Advertisers also sought advice on the rules covering food and beverage advertising, advertising to children, and motor vehicle advertising.

This essential service provided by Ad Standards is available to all advertisers including small and medium businesses, creative agencies and industry associations to get quick and cost-effective advice on advertising campaigns across all media – from print to outdoor, radio, cinema, internet, social media or television.

Advertisers can request professional advice in advance of publication which will alert them to potential issues with the advertising Codes and Initiatives administered by Ad Standards.

Resources for advertisers

The Ad Standards Copy Advice Service is the fastest and most cost-effective way to check whether or not your campaign is likely to meet community standards.

Other resources to support compliance with the advertising Codes include:

- bespoke training to meet your individual advertiser needs – delivered face-to-face or online
- online training resources about the advertising Codes and the self-regulation system, and
- determination summaries featuring precedent information.

You can also subscribe to receive the latest news in the Ad Standards Bulletin, follow @Ad_Standards on Twitter and LinkedIn, and visit **AdStandards**.com.au for more information.

Determination summaries

The determination summaries (adstandards.com.au/codes-and-cases/determination-summaries) published on the Ad Standards website provide precedent information for advertisers and the community about previous Community Panel determinations on particular issues.

This is a useful guide, though the Community Panel will consider every new case on its own merits and is not formally bound by precedent.

The majority of cases considered by the Community Panel fall under the AANA Code of Ethics. The Panel considers cases under Section 2 of the Code of Ethics, which has seven sub sections:

2.1 Discrimination or vilification

2.2 Exploitative or degrading

2.3 Violence

2.4 Sex, sexuality and nudity

2.5 Language

2.6 Health and safety

2.7 Distinguishable advertising

Determination summaries for the other Codes and Initiatives administered by Ad Standards are also published online:

- Advertising to Children - AANA Code for Advertising and Marketing Communications to Children (the Children's Code).
- Food and beverage advertising - AANA Food and Beverages Advertising and Marketing Communication Code (the Food Code), the AFGC Responsible Children's Marketing Initiative (RCMI), and Quick Service Restaurant Initiative (QSRI).
- Wagering advertising - AANA Wagering Advertising & Marketing Communication Code (the Wagering Code).
- Environmental advertising - AANA Environmental Claims Code (the Green Code).
- Motor vehicle advertising - Federal Chamber of Automotive Industries (FCAI) Voluntary Code of Practice for Motor Vehicle Advertising (the Car Code).

Codes and Initiatives administered by Ad Standards

In 2020 Ad Standards administered the following Codes and Initiatives. The Ad Standards Community Panel will consider complaints which raise issues under their terms.

- Australian Association of National Advertisers (AANA) Code of Ethics
- AANA Food and Beverages Advertising Code [1] [2]
- AANA Code for Advertising and Marketing Communications to Children
- AANA Environmental Claims Code
- AANA Wagering Advertising & Marketing Communication Code
- Australian Food and Grocery Council (AFGC) Responsible Children's Marketing Initiative (RCMI) [2]
- AFGC Quick Service Restaurant Initiative (QSRI) for Responsible Advertising and Marketing to Children [2]
- Federal Chamber of Automotive Industries (FCAI) Voluntary Code of Practice for Motor Vehicle Advertising

1 In February 2020 the AANA amended the Food and Beverages Advertising Code to allow fresh fruit and vegetables to be advertised to children without complying with the RCMI, provided the fruit and vegetables are the only food product in the advertisement.

2 In July 2020 the AANA Food and Beverage Code changed to include management of the *Responsible Children's Marketing Initiative (RCMI) of the Food and Beverage Industry*, and the *Quick Service Restaurant Initiative (QSRI) for Responsible Advertising and Marketing to Children* initiatives which now apply to all advertisers.

Australia's most complained about advertisements in 2020

Community concerns about advertisements seen across television platforms dominated the list of the most complained about advertisements in Australia in 2020, with a combined 794 complaints in total received about the content of TVCs on free-to-air TV, Pay TV, and TV on-demand.

The most complained about advertisement in Australia in 2020 was a Baywatch-themed automotive ad which generated over 300 complaints across issues including nudity, exploitative or degrading scenarios, and discrimination against or vilification of women.

Three ads from the one fast food advertiser were in the top five of the most complained about ads for the year. Complainants raised concerns about sexualised content, gender stereotypes, encouraging bad language and promoting an unhealthy lifestyle.

While the ads in the top 10 list attracted negative attention, the Community Panel found that the concerns raised in the complaints against each ad did not breach the advertising Codes.

In total, 392 cases were raised in 2020, with 31 of these voluntarily withdrawn from broadcast or publication with advertisers choosing to modify or remove the content that triggered the complaints before consideration by the Ad Standards Community Panel (another eight cases were created but not put forward to the Panel for various reasons).

1

Car trouble?

Ultra Tune Australia – TV – Free-to-air

Number of complaints: 315 – Dismissed
Issues of concern: 2.1 – Discrimination or vilification, 2.2 – Exploitative or degrading, 2.3 – Violence, 2.4 – Sex/sexuality/nudity, 2.6 – Health and safety, 2.7 – Distinguishable advertising.

2

Festival girl

Yum Restaurants International – TV – Free-to-air

Number of complaints: 187 – Dismissed
Issues of concern: 2.1 – Discrimination or vilification, 2.2 – Exploitative or degrading, 2.4 – Sex/sexuality/nudity.

3

Thank you

Yum Restaurants International – TV – Free-to-air

Number of complaints: 66 – Dismissed
Issues of concern: 2.1 – Discrimination or vilification, 2.2 – Exploitative or degrading, 2.4 – Sex/sexuality/nudity.

4

Period underwear

Modibodi – TV – Pay

Number of complaints: 45 – Dismissed
Issues of concern: 2.1 – Discrimination or vilification, 2.3 – Violence, 2.4 – Sex/sexuality/nudity.

5

Bucket

Yum Restaurants International – TV – Free-to-air

Number of complaints: 41 – Dismissed
Issues of concern: 2.1 – Discrimination or vilification, 2.2 – Exploitative or degrading, 2.5 – Language, Food and Beverages Code – 2.2, QSRI – 1.1.

6

Period underwear

Modibodi – TV – On-demand

Number of complaints: 34 – Dismissed
Issues of concern: 2.1 – Discrimination or vilification, 2.3 – Violence, 2.4 Sex/sexuality/nudity.

7

Talking toys

ReAmped Energy – TV – On-demand

Number of complaints: 27 – Dismissed
Issue of concern: 2.5 – Language.

8

Flying bananas

ALDI Australia – TV – Free-to-air

Number of complaints: 21 – Dismissed
Issue of concern: 2.3 – Violence.

9

Tradies deodorant

SOJO Pty Ltd – TV – Free-to-air

Number of complaints: 21 – Dismissed
Issues of concern: 2.4 – Sex/sexuality/nudity, 2.6 – Health and safety.

10

Snoop Dogg

Menulog – TV – Free-to-air

Number of complaints: 19 – Dismissed
Issues of concern: 2.1 – Discrimination or vilification, 2.2 – Exploitative or degrading, 2.4 – Sex/sexuality/nudity.

Complaints adjudication in the time of COVID

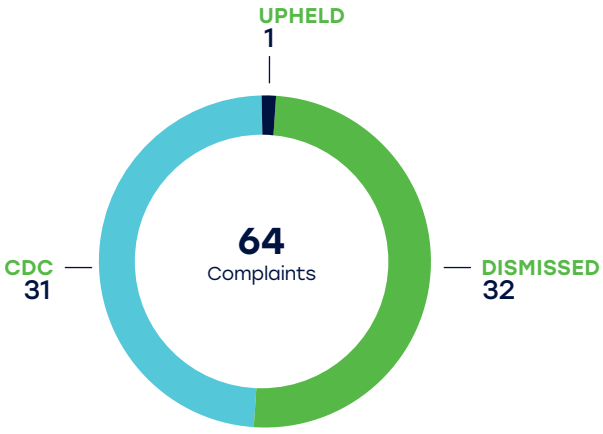
Like most business sectors during 2020, the Australian advertising industry was faced with a number of challenges as a result of the COVID-19 pandemic. A shift in public opinion on the types of behaviours viewed as appropriate to show in advertising content proved an important consideration for marketers during the pandemic.

As the Australian advertising complaints adjudicator, Ad Standards also had to adapt to the situation to ensure our complaints adjudication process continued to be an effective and efficient way for the community to raise their concerns about ad content.

We noticed an early trend of consumer sensitivities towards specific types of behaviours shown in ads (such as social gatherings) and moved quickly to provide advice to advertisers about the importance of aligning their content with both prevailing community standards and Australian Government health guidelines.

To minimise the risk of their ads being complained about, we encouraged advertisers to ask the question: *does this content meet community standards right now?*

COVID-19 complaint categorisation



> **To minimise the risk of their ads being complained about, we encouraged advertisers to ask the question: does this content meet community standards right now?**

Recognising that many advertisements were created before the pandemic, Ad Standards and the Community Panel adopted a pragmatic regulatory approach to public concerns about ad content that showed usual community behaviour which was no longer acceptable because of the pandemic, such as congregating in groups.

One of the first cases to raise these issues was an ad for cold and flu medication showing a woman coughing in a public park. Complainants raised concerns about the depiction of people failing to self-isolate while sick and treating COVID-19 symptoms themselves.

The Community Panel, however, determined that the imagery would have been in line with prevailing community standards pre-pandemic and dismissed the complaints. The Panel took the view that it would be unreasonable to prevent advertisers from using any ads that had been made pre-pandemic.

Many advertisers have since chosen to include a note along the lines of 'filmed pre-COVID' to their advertising content to provide context to viewers.

A COVID-19 'consistently dismissed complaint' letter was developed at the beginning of the year and sent to complainants who raised pandemic-related issues, where the ad content would not normally be in breach of community standards and did not mock the pandemic or suggest that public health measures were unimportant. Thirty-one complainants received this letter during 2020 acknowledging their concerns and notifying them of the reasons their complaint did not proceed to a case for adjudication.

Out of the total 3,514 complaints lodged with Ad Standards in 2020, less than 70 complainants referred to pandemic-related issues in advertising content, with just one advertisement found to breach Section 2.6 (health and safety) of the AANA Code of Ethics on COVID-19 related grounds.

The upheld complaint was about a lottery advertisement, which was found by the Community Panel to trivialise social distancing and hygiene guidelines. While the advertiser had used the imagery of a man bursting out of a toilet stall and hugging a stranger prior to the pandemic, the voiceover encouraging viewers to 'forget the elbow taps' was added to the advertisement during the year.

> **Overall, advertisers during 2020 continued to demonstrate their understanding of the importance of creating socially responsible content aligned to community standards**

In response to the Panel's determination, the advertiser confirmed the ad had been discontinued following the complaint.

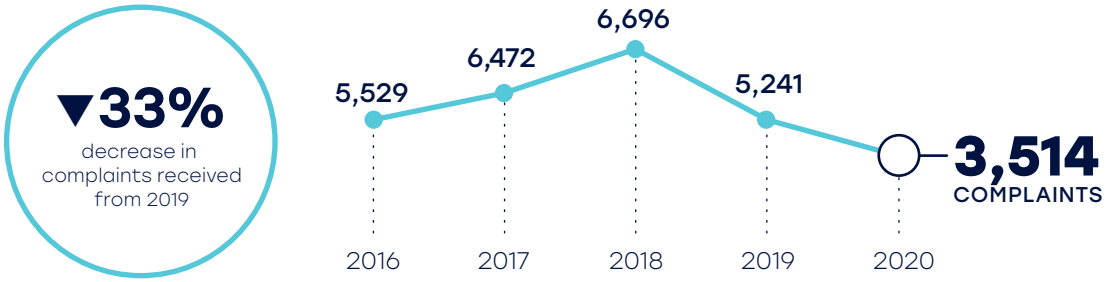
Overall, advertisers during 2020 continued to demonstrate their understanding of the importance of creating socially responsible content aligned to community standards, especially in times where extra sensitivity is needed. We thank the Australian advertising industry for continuing to support the self-regulatory system and for ensuring community expectations are at the forefront of their creative decisions.

Advertising complaints and statistics

In 2020, consumers lodged a total of 3,514 complaints about advertising content, raising concerns about 353 advertisements across all media channels - from print to outdoor, radio, cinema, internet, social media and television.

Complaints were assessed against one or more issues in the advertising Codes and Initiatives administered by Ad Standards. The advertising Codes cover a wide range of issues reflecting the issues that concern the community.

The total number of complaints received in 2020 decreased from 2019 (5,241), reflecting the financial impact of COVID-19 on advertisers in Australia, in line with global reports of reduced advertising spend. Anecdotally there were also fewer large campaigns, and fewer new advertisements overall, produced in 2020.



The number of consistently dismissed complaints (CDCs) remained high at 577 (16.42 per cent) and in 2020 included a new COVID-19 category (see the story 'Complaints adjudication in the time of COVID-19' on page 15).

CDCs are complaints which raise issues under the codes administered by Ad Standards but were not submitted to the Community Panel on the basis that the Panel has consistently assessed the issues raised in those complaints to be not in breach of the Codes.

These complaints are submitted to the Chair of the Community Panel (a rotating position) for assessment, to prioritise and increase the efficient use of the Panel's time.

The most complained about advertisement considered by the Community Panel in 2020 featured Pamela Anderson and Warwick Capper in a Baywatch-style automotive advertisement which generated over 300 complaints about wide-ranging issues from sexism to nudity, exploitation and dangerous behaviour.

For the first time, three advertisements from one advertiser were among the top five of the 10 most complained about ads of the year with concerns raised about gender stereotypes, sexualised content, language and healthy eating.

The 10 most complained about advertisements in 2020 were all seen on television platforms, with a combined 794 complaints in total received about the content of television advertisements seen across free-to-air, subscription and on-demand TV.

Complaints received about advertisements seen on TV on-demand more than tripled from 2019 (1.79 per cent), making this the third most complained about media in 2020 (5.41 per cent). This may be due to the COVID-19 pandemic influencing media consumption and people watching more streamed television (see 'Which media attracted the most complaints' on page 24).

The majority of complaints in 2020 continued to be about ads seen on free-to-air television (66.62 per cent).

Complaints and Ad Standards' jurisdiction

Of the 3,514 total complaints received in 2020, 42.80 per cent (1,504) were determined to be within the scope of the advertiser Codes and were linked to cases considered by the Community Panel in 2020.

Over seven per cent of complaints (265) received were about advertisements that had already been considered by the Community Panel in previous years. Once the Panel has considered complaints about a particular advertisement, then further complaints about the same advertisement will generally not be considered by the Community Panel again until five years after the case was first considered.

A further 16.42 per cent of complaints (577) were processed as raising issues consistently dismissed as the matters have previously been found to not breach the Codes. These complaints are all assessed by the Chair of the Community Panel to increase the efficient use of the Panel's time. Ad Standards makes every effort to notify advertisers about these complaints even though the Panel doesn't consider them.

Finally, 33.24 per cent of complaints (1,168) received were about matters not within Ad Standards' jurisdiction, including for example complaints about the fact that some products can be advertised at all, and about alcohol products, which are referred to the ABAC (Alcohol Beverages Advertising Code) Scheme for consideration under the *ABAC Responsible Alcohol Marketing Code*. These may also be assessed by Ad Standards to see if they raise an issue under the AANA Code of Ethics.

When matters are not within Ad Standards' jurisdiction, the complainant is advised why that is so and, where possible, is referred to the appropriate regulatory body.

Ad Standards Community Panel determinations

The 3,514 complaints received in 2020 related to a total of 353 advertisements which raised Code issues in 2020 and were considered by the Ad Standards Community Panel to determine whether the material met the requirements of the advertising Codes.

Of the total number of advertisements that were considered by the Community Panel, 69 (19.54 per cent) were found by the Community Panel to be in breach of one or more advertising Codes. While this rate is higher than 2019 (15.76 per cent) it still shows a good level of advertiser compliance with the Codes, as does advertisers' readiness to withdraw complained-about ads before adjudication and in response to Community Panel decisions.

The Community Panel had 22 scheduled meetings throughout the year to consider the 353 advertisements complained about in 2020. A further 31 advertisements were voluntarily withdrawn from broadcast/publication before the cases were considered by the Community Panel.

Cases of potential Code issues considered by the Community Panel

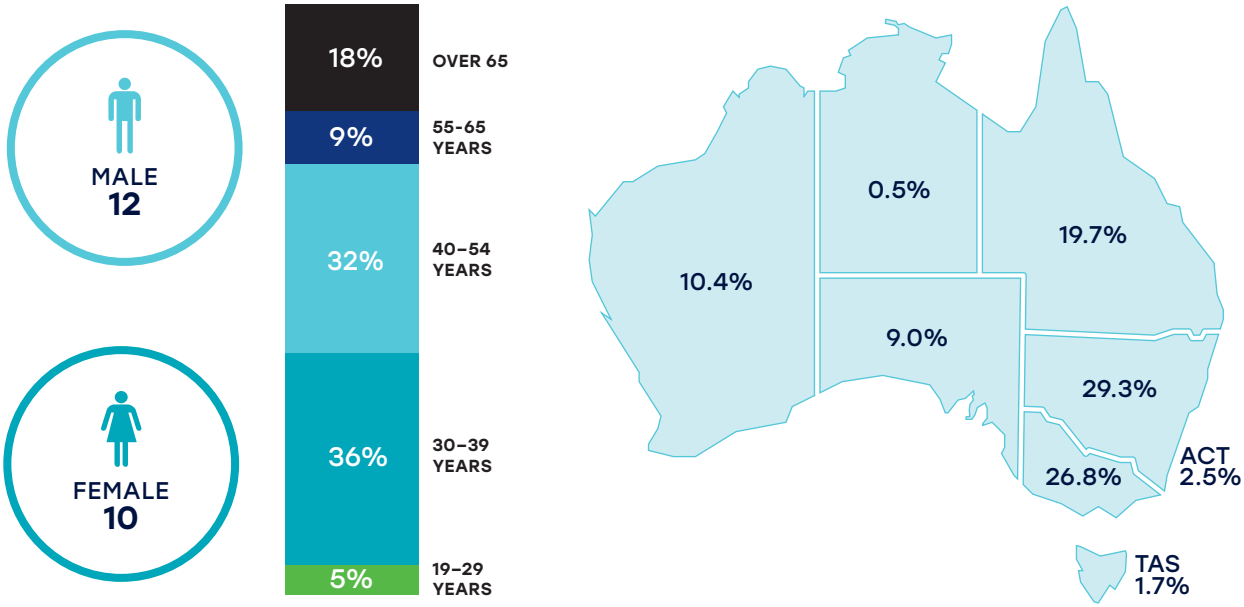
Community Panel meetings in 2020 to consider cases

Outcome of cases determined by the Community Panel

The Ad Standards Community Panel 2020 profile

The Ad Standards Community Panel is an independent body of community representatives responsible for considering complaints made by members of the public about the content of advertisements across all mediums. It represents the wide range of Australian community opinion. Panel members represent culturally and linguistically diverse backgrounds, people with disability, and regional, metropolitan and remote communities.

See the story on page 9 for more information about the Community Panel.



What do people complain about?

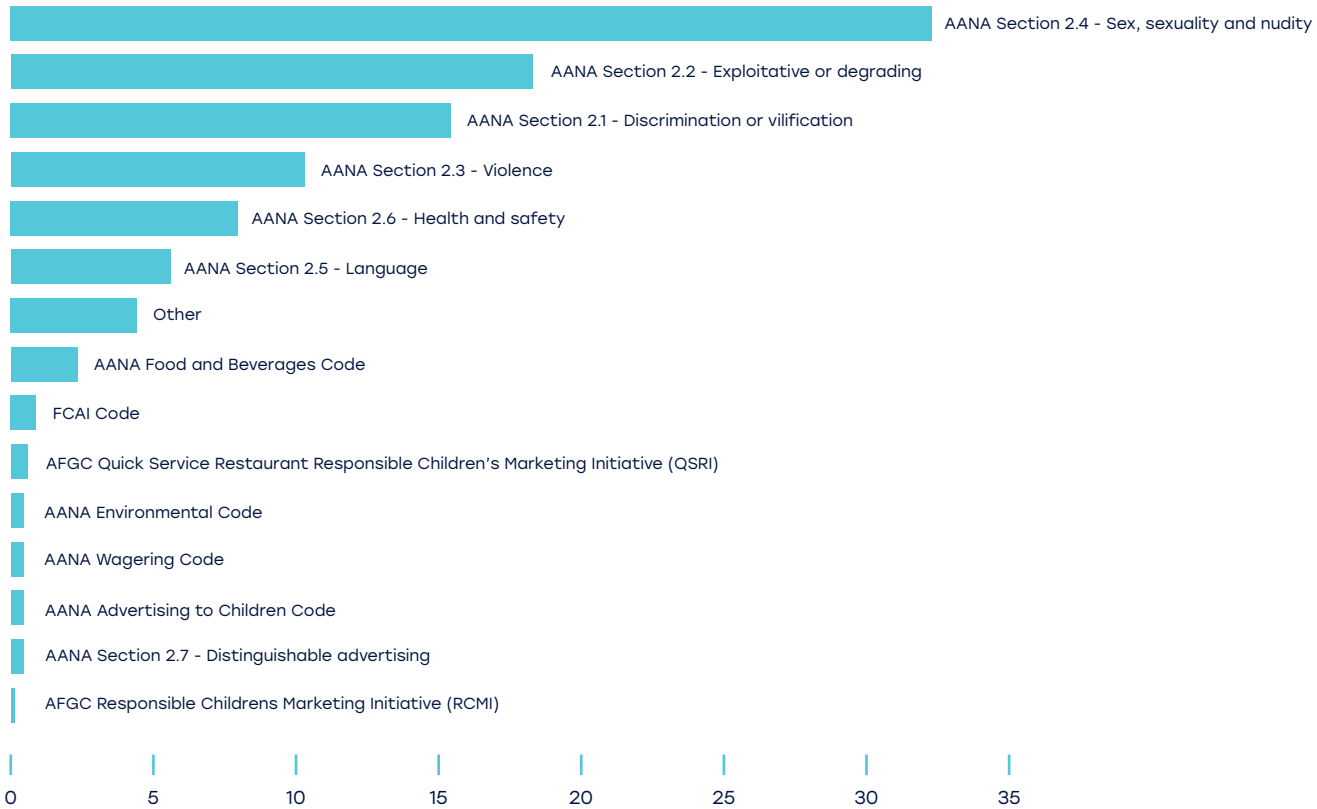
The top three community concerns in 2020 were sex/sexuality/nudity, exploitative or degrading content, and discrimination or vilification on grounds such as race or gender. These are consistently some of the most complained about issues considered by the Ad Standards Community Panel.

This year shows significantly increased community concern about sex/sexuality/nudity with complaints almost doubling to 32.29 per cent up from 16.37 per cent of complaints received in 2019.

Concerns about exploitative or degrading content more than tripled to 18.29 per cent (from 5.96 per cent) and this was the second most complained about issue in 2020, followed by concerns about discrimination or vilification (15.43 per cent, up from 13.08 per cent).

These were also the key issues of concern in four of the top five most complained about ads assessed during the year. The most complained about ad in 2020 featured an ad for an automotive company with a Baywatch-theme which generated complaints about the relevance of women in swimsuits with fixing cars and concerns about the sexualisation and objectification of women, as well as stereotyping men.

> **The top three community concerns in 2020 were sex/sexuality/nudity, exploitative or degrading content, and discrimination or vilification on grounds such as race or gender.**



Key issues of community concern in advertising content 2020

> **In 2020 over 90 per cent of all complaints considered by the Community Panel related to issues of community concern covered by the AANA Code of Ethics**

The second most complained about ad of the year was for a fast-food chain featuring a young woman in a low-cut top checking her reflection in a car window which winds down to reveal two young boys and an unimpressed mother. Issues complained about include the content being inappropriate as it appears to sexualise children and reinforce gender stereotypes.

There was a slight increase in community concern about health and safety, from 5.25 per cent in 2019 to nearly 8 per cent in 2020. In August, an online lingerie campaign which raised health and safety concerns about the depiction of an unrealistic body shape was the first case to be upheld on this issue by the Community Panel since the guidelines on the portrayal of body image were tightened in 2018.

Concerns raised about food advertising also increased slightly in 2020 to 2.33 per cent (from 1.56 per cent in 2019) which may relate to the 2019 changes to the RCMI (Responsible Children's Marketing Initiative, and the QSRI (Quick Service Restaurant Initiative) which now apply to all advertisers, not just signatories.

In 2020 over 90 per cent of all complaints considered by the Community Panel related to issues of community concern covered by the AANA Code of Ethics. This is an increase of nearly 30 per cent from 2019 (62.40 per cent).

What products attracted complaints?

Complaints about advertisements for food and beverage products were again the most complained about category in 2020 at 22.23 per cent of all complaints. This may be explained by the high volume of food and beverage advertising which attracts a proportionately high volume of complaints.

The second most complained about product category was automotive (9.79 per cent) which relates in large part to the Baywatch-themed ad which was the most complained about advertisement in 2020.

Concerns raised about health products (7.91 per cent) made this the third most complained about category and relate principally to two advertisements for period underwear. Issues raised included the depiction of menstrual blood and the degradation of women. The ads, which generated vigorous debate, were seen on Pay TV and TV on-demand and were the fourth and sixth most complained about ads of 2020.

In 2020 a new category was created to capture complaints about advertisements with political/social messages (2.39 per cent), which do not fall within Ad Standards' remit and were previously grouped under 'other' and 'community awareness' categories.

Most complaints by category 2020

FOOD & BEVERAGES
22.23%

AUTOMOTIVE
9.79%

HEALTH PRODUCTS
7.91%

COMMUNITY AWARENESS
6.43%

5.75%
Alcohol

5.49%
Gambling

4.35%
House goods/services

4.04%
Entertainment

3.98%
Sex industry

3.59%
Clothing

2.59%
Toiletries

2.45%
Insurance

2.39%
Political/social message

2.31%
Lingerie

2.11%
Vehicles

1.91%
Finance/investment

1.65%
Retail

1.31%
Real estate

1.20%
Telecommunications

1.17%
Leisure and sport

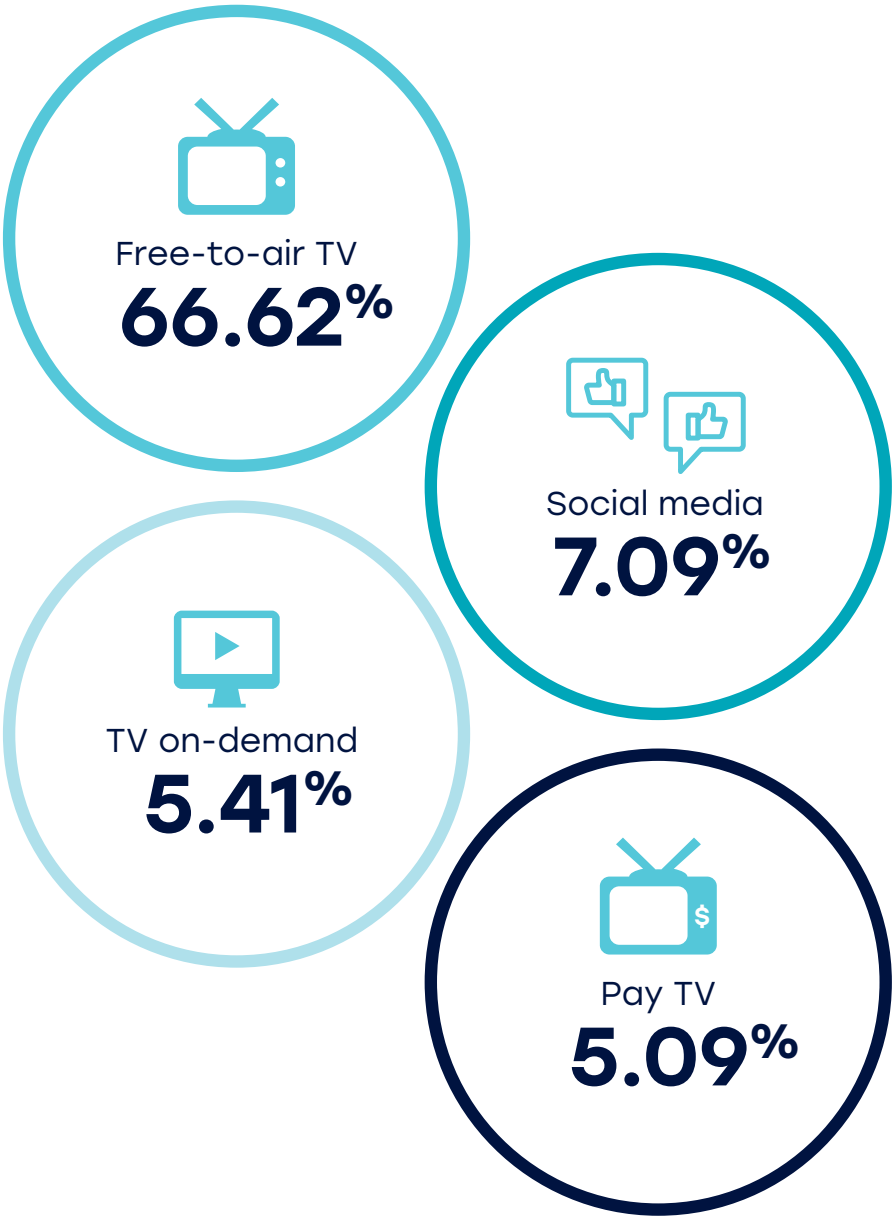
Ads on which media attracted the most complaints?

For the first time in seven years, the number of complaints lodged about advertisements seen on free-to-air TV fell below 70 per cent of the total. However, the highest number of overall complaints received (66.62 per cent) continued to be about ads seen on standard broadcast channels.

The second most complained about media in 2020 was social media which increased to 7.09 per cent (from 3.99 per cent in 2019). Complaints about advertisements seen on TV on-demand tripled to 5.41 per cent, up from 1.79 per cent in 2019.

These results align with 2020 consumer research from the Australian Communications and Media Authority highlighting the increased use of the internet by many Australians in 2020 to view and listen to content in general. For example, during the mid-year survey period more than a third (36 per cent) of respondents had viewed content through a catch-up service (up from 29 per cent in 2019).

Concerns about ads seen on Pay TV were also higher than the previous year at 5.09 percent (up from 3.40 per cent).



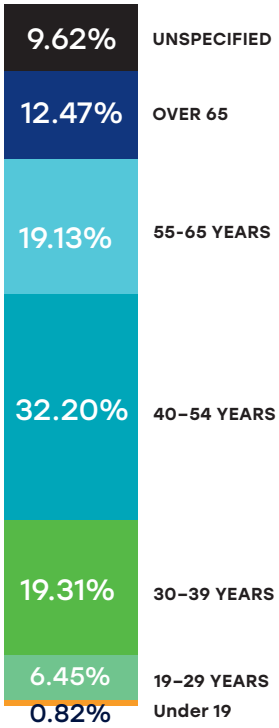
Community profile: where are complaints coming from?

What age are complainants?

The ages of complainants have been similar since 2008 when data first started to be collated.

1. People aged 40 to 54 years contribute the highest number of all complaints at 32.20 per cent.
2. People aged 30 to 39 years account for 19.31 per cent of complaints.
3. People aged 55 to 65 years account for 19.13 per cent of complaints.

People aged over 65 contribute 12.47 per cent of all complaints, while the younger demographic of people aged 19 to 29 years also actively participate in the advertising complaints adjudication system and in 2020 accounted for 6.45 per cent. Just under one per cent of complaints were from people aged under 19.

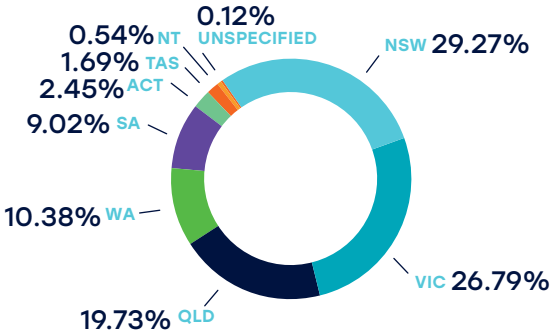


Where do people live?

The percentage of complaints received from most States and Territories remained consistent with previous years and are generally in line with national demographic trends.

As with previous years, the most populous state, New South Wales, topped the percentage of complaints received (29.27 per cent). Complaints from Victoria increased (26.79 per cent), while complaints from Queensland dropped slightly (19.73 per cent).

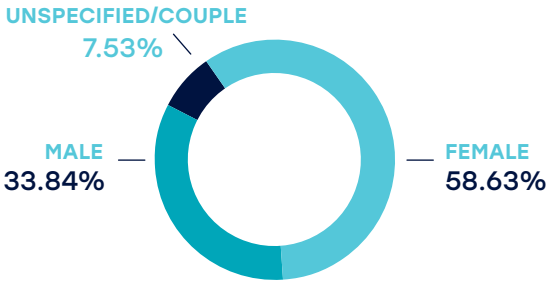
Complaints received from the other States included Western Australia (10.38 per cent), South Australia (9.02 per cent), the Australian Capital Territory (2.45 per cent), Tasmania (1.69 per cent), and the Northern Territory (0.54 per cent).



Who is complaining?

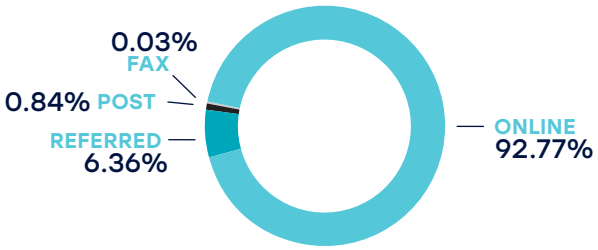
In 2020 women were again more likely to complain than men, with 58.63 per cent of complaints coming from women. This is lower than in 2019 at 66.02 per cent.

The percentage of complaints from men (33.84 per cent) is slightly higher than the previous year (31.64 per cent). Some people chose to identify as unspecified or as a couple.



How do people complain?

The majority of complaints (92.77 per cent) are lodged through the online complaints system on the Ad Standards website. The number of complaints lodged by post and fax dropped significantly in 2020 to a combined 0.87 per cent. About 6 per cent of complaints were lodged through Free TV and referred to Ad Standards.



Measuring our impact

These tables show key statistics over the last five years (2016 to 2020). Data collated prior to 2016 (from 1998 to 2015) is available on the Ad Standards website.

ALLOCATION OF COMPLAINTS (No., by complaint)

	2016	2017	2018	2019	2020
Complaints within jurisdiction	3,134	3,035	2,708	2,152	1,181
Complaints outside jurisdiction	1,322	1,588	2,121	1,642	1,168
Complaints about already considered advertisements (current year)	578	1,165	916	769	323
Complaints about already considered advertisements (previous years)	336	359	412	230	265
Consistently dismissed complaints	115	234	502	448	577
Not allocated at 31 December	44	91	37	0	0
TOTAL	**5,529**	**6,472**	**6,696**	**5,241**	**3,514**

COMMUNITY PANEL DETERMINATIONS (No., by advertisement)

	2016	2017	2018	2019	2020
Upheld	71	85	85	58	69
Dismissed	462	447	403	310	284
Withdrawn before Community Panel determination	43	29	43	39	31
Not proceeding to Community Panel	19	30	23	8	8
TOTAL	**595**	**591**	**554**	**415**	**392**

ISSUES ATTRACTING COMPLAINT (%)

	2016	2017	2018	2019	2020
AANA Section 2.4 - Sex, sexuality and nudity	22.74%	14.59%	36.39%	16.37%	32.29%
AANA Section 2.2 - Exploitative or degrading	12.30%	9.06%	5.87%	5.96%	18.29%
AANA Section 2.1 - Discrimination or vilification	27.23%	18.34%	8.66%	13.08%	15.43%
AANA Section 2.3 - Violence	17.98%	12.57%	26.58%	15.78%	10.29%
AANA Section 2.6 - Health and safety	5.36%	12.55%	4.83%	5.25%	7.96%
AANA Section 2.5 - Language	11.45%	18.79%	7.09%	5.82%	5.59%
Other	1.52%	4.77%	3.72%	33.91%	4.43%
AANA Food and Beverages Code	0.56%	0.97%	1.13%	1.56%	2.33%
FCAI Code	0.29%	0.60%	1.04%	0.85%	0.89%
AFGC Quick Service Restaurant Resp Children's Marketing Initiative (QSRI)	0.03%	0.20%	0.32%	0.26%	0.58%
AANA Environmental Code	0.03%	0.05%	0.05%	0.34%	0.45%
AANA Wagering Code	0.26%	6.66%	3.35%	0.31%	0.45%
AANA Advertising to Children Code	0.17%	0.52%	0.50%	0.20%	0.45%
AANA Section 2.7 - Distinguishable advertising	0.00%	0.22%	0.41%	0.14%	0.45%
AFGC Responsible Children's Marketing Initiative (RCMI)	0.09%	0.11%	0.07%	0.17%	0.13%
TOTAL	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**

PRODUCT CATEGORY ATTRACTING COMPLAINT (%)

	2016	2017	2018	2019	2020
Food and beverages	26.26%	24.01%	10.72%	18.43%	22.23%
Automotive	23.54%	12.71%	4.18%	2.70%	9.79%
Health products	0.40%	0.84%	2.50%	2.95%	7.91%
Community awareness	3.58%	2.97%	3.57%	4.67%	6.43%
Alcohol	1.75%	0.30%	0.79%	2.46%	5.75%
Gambling	1.54%	18.31%	23.12%	4.67%	5.49%
House goods/services	2.13%	2.30%	1.50%	5.90%	4.35%
Entertainment	5.31%	5.09%	8.96%	11.30%	4.04%
Sex industry	2.56%	1.51%	1.60%	4.42%	3.98%
Clothing	1.75%	1.30%	1.52%	4.42%	3.59%
Toiletries	1.24%	0.00%	1.55%	0.98%	2.59%
Insurance	4.34%	4.72%	19.91%	2.70%	2.45%
Political/social message *	-	-	-	-	2.39%
Lingerie	3.74%	5.14%	7.28%	11.79%	2.31%
Vehicles	2.02%	1.86%	1.84%	5.90%	2.11%
Finance/investment	3.04%	3.72%	1.71%	2.21%	1.91%
Retail	0.54%	1.42%	0.45%	2.21%	1.65%
Real estate	0.19%	0.21%	0.84%	0.98%	1.31%
Telecommunications	0.13%	0.35%	0.11%	1.23%	1.20%
Leisure and sport	12.15%	8.41%	4.41%	0.74%	1.17%
Professional services	1.19%	0.84%	0.81%	2.21%	1.08%
Information technology	0.08%	0.07%	0.08%	0.25%	0.88%
Media	0.22%	0.12%	0.08%	0.49%	0.85%
Religion/beliefs	0.00%	0.02%	0.00%	0.00%	0.60%
Mobile phone/SMS	0.11%	0.05%	0.16%	0.25%	0.60%
Travel	0.83%	0.44%	1.86%	3.69%	0.54%
Toys and games	0.22%	0.23%	0.05%	0.25%	0.51%
Hardware/machinery	0.54%	0.14%	0.18%	0.49%	0.51%
Tourist attractions	0.00%	2.63%	0.00%	0.00%	0.46%
Education	0.13%	0.02%	0.13%	0.25%	0.37%
Slimming	0.08%	0.07%	0.00%	0.74%	0.37%
Beauty salon	0.03%	0.07%	0.08%	0.49%	0.28%
Employment	0.13%	0.02%	0.00%	0.00%	0.23%
Bars and clubs	0.22%	0.02%	0.00%	0.00%	0.09%
Other	0.00%	0.09%	0.03%	0.25%	0.00%
Office goods/services	0.03%	0.00%	0.00%	0.00%	0.00%
TOTAL	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**

* New category created in 2020

ANALYSIS OF COMPLAINTS BY MEDIA (%)

	2016	2017	2018	2019	2020
TV - Free-to-air	70.34%	79.06%	76.39%	71.33%	66.62%
Internet - Social media	4.55%	2.49%	2.61%	3.99%	7.09%
TV - On-demand	-	-	-	1.79%	5.41%
TV - Pay	3.48%	3.81%	3.02%	3.40%	5.09%
Radio	2.37%	1.37%	1.67%	2.43%	2.90%
Internet	6.90%	2.93%	2.15%	1.67%	2.36%
Poster	3.85%	4.62%	2.76%	2.82%	2.25%
Billboard	3.24%	2.28%	4.26%	4.03%	1.48%
Transport	1.58%	1.12%	1.85%	2.05%	1.02%
Billboard - Digital *	-	-	-	-	0.80%
Print	1.09%	0.51%	0.49%	0.78%	0.80%
Outdoor	0.47%	0.33%	0.60%	1.26%	0.71%
Email	0.00%	0.00%	0.00%	0.36%	0.63%
App *	-	-	-	-	0.60%
Packaging (alcohol) *	-	-	-	-	0.57%
TV - Out of home	0.00%	0.00%	0.00%	0.65%	0.40%
Promotional material	0.00%	0.00%	0.00%	1.62%	0.34%
Billboard - Mobile*	-	-	-	-	0.34%
Mail	0.39%	0.42%	0.33%	0.23%	0.26%
SMS *	-	-	-	-	0.17%
Cinema	0.57%	0.12%	0.40%	0.34%	0.11%
Flying banner *	-	-	-	-	0.03%
Stadium/arena *	-	-	-	-	0.03%
Other **	1.17%	0.95%	3.46%	1.24%	n/a
TOTAL	**100.00%**	**100.00%**	**100.00%**	**102.70%**	**100.00%**

* Previously grouped into 'other' category (not reported on by line item).
** n/a = Previous 'other' categorisation expanded in 2021 to report on by line item, as above.

ANALYSIS OF CASES BY MEDIA (%) *

	2016	2017	2018	2019	2020
TV - Free-to-air	40.45%	42.96%	38.81%	42.26%	38.90%
Internet - Social media	7.64%	5.88%	7.71%	8.60%	14.62%
TV - On-demand	0.69%	1.07%	2.07%	3.19%	7.05%
Internet	7.47%	7.84%	5.84%	2.46%	6.79%
Poster	7.99%	5.88%	10.55%	10.81%	5.22%
TV - Pay	7.47%	7.66%	4.90%	3.44%	5.22%
Radio	7.81%	7.31%	6.59%	5.90%	4.44%
App	0.00%	0.71%	0.56%	1.72%	3.13%
Transport	4.34%	4.99%	7.16%	5.90%	2.61%
Billboard - Static	5.90%	7.13%	5.46%	6.14%	2.09%
Outdoor	1.56%	1.43%	2.26%	3.44%	1.83%
Billboard - Digital	-	-	-	-	1.57%
Email	1.22%	1.96%	1.69%	0.98%	1.57%
Print	2.26%	2.67%	2.45%	1.97%	1.57%
Promo material	0.52%	0.18%	1.13%	0.00%	1.31%
TV - Out of Home	1.04%	0.53%	1.13%	1.97%	1.31%
Billboard - Mobile	0.17%	0.00%	0.19%	0.25%	0.26%
Cinema	2.08%	0.89%	1.13%	0.74%	0.26%
Mail	1.39%	0.71%	0.38%	0.00%	0.26%
Flying banner	0.00%	0.00%	0.00%	0.00%	0.00%
SMS	0.00%	0.18%	0.00%	0.25%	0.00%
TOTAL	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**

* This table relates to individual cases, not complaints

CONSISTENTLY DISMISSED COMPLAINTS (No.)

	2016	2017	2018	2019	2020
Consistently dismissed issue	29	26	158	83	180
Unlikely interpretation	47	57	134	129	163
Consistently dismissed language	10	91	110	103	65
Lingerie advertising	-	-	-	29	49
Same advertisement different media	-	12	21	6	44
COVID-19 *	-	-	-	-	31
Incorrect about content	5	11	15	18	14
Not of concern to broad community	9	4	23	22	12
Product name	1	2	7	4	8
Multicultural community	8	19	13	15	4
Images of food	2	5	4	6	4
Food/beverage logos	0	0	0	0	2
Stereotypical depictions	3	4	17	33	1
Consistently dismissed - MLA	1	3	0	0	0
TOTAL	**115**	**234**	**502**	**448**	**577**

* New category created in 2020.

REASON COMPLAINT DID NOT PROCEED TO A CASE (No.)

	2016	2017	2018	2019	2020
Misleading, truth and accuracy (not food)	118	116	156	131	138
Not S2 - general	19	82	89	142	129
Not S2- ABAC Only	60	43	84	72	108
Gambling product - timing TV	150	201	238	126	96
Not an ad - general	34	52	60	80	95
Social/political issues	107	48	188	114	95
Not S2 - disagree with content	218	189	130	140	77
Tasteless advertising	12	2	198	244	65
Insufficient information to identify ad - general	85	69	91	58	47
Product or service - general	36	31	75	33	39
Advertisement withdrawn/discontinued before case established	18	50	42	2	34
Not S2 - inappropriate behaviour	11	10	79	50	28
Not S2 - personal issue	38	27	39	23	27
Promotion TV and radio	27	19	45	21	26
Timing - TV	36	17	51	63	20
Not S2 - dislike advertising	4	7	28	36	14
Not S2 - freedom of speech	91	35	11	2	13
Too many ads	12	20	5	18	10
Legality	21	20	35	31	9
Not S2 - ACMA	12	16	3	7	9
Therapeutic Goods	13	5	14	14	9
Not S2 - not discrimination	19	18	28	31	8
Not S2 - Unfortunate Placement - horror movies	0	0	0	47	7
Not S2 - use of a personality	12	3	7	4	7
Loud ads	14	3	3	9	6
Subliminal advertising	2	8	4	4	6
Business practices unethical	2	2	6	8	5
Not S2 - not Wagering Code	1	0	8	8	5
Not S2 - ADMA	2	0	4	2	5
Editorial	10	8	10	2	4
Withdrawn - complainant	0	2	5	4	4
Not S2 - unfortunate placement	4	5	5	4	3
Dissatisfied - Ad Standards ineffective enforcement	0	0	0	3	2
Insufficient information to identify ad - Honey Birdette	0	0	0	5	2
Not S2 - grammar in advertisements	4	2	3	1	2
Not S2 - use of Children	0	0	9	4	2
Programming and content	16	7	287	6	2
Wicked Campers - need for detailed information	17	2	11	8	2
Ad not broadcast in Australia	12	14	16	6	1
Ad Standards complainant dissatisfied	22	9	10	13	1
Dislike of Advertising - Lingerie products	0	0	0	18	1
Gambling during live sport	0	0	0	7	1
Not an ad - food packaging	3	0	3	3	1
Overseas complaint	8	7	14	12	1
Timing - radio broadcast	0	2	1	0	1
Tobacco advertising	1	3	2	0	1
Ad Standards - not pre-screening body	1	0	0	0	0

	2016	2017	2018	2019	2020
Ad Standards Industry Jury/Claims Board competitor	7	1	0	0	0
Competition coupons	0	1	0	0	0
Dislike of advertising - AMI radio ads	18	3	1	0	0
Dislike of advertising - AMI TV ads	1	0	0	0	0
Gambling odds in commentary	1	3	0	1	0
Motor vehicle - RHS road	0	2	4	7	0
Not S2 - Unfortunate Placement -YouTube	0	0	0	1	0
Not S2-Predominantly men or women	0	0	0	6	0
Outside Charter -political - same sex marriage	0	390	0	0	0
Overseas website with no Aust connection	1	1	0	0	0
Product or service - food	1	1	0	1	0
Product or service - on radio	2	1	2	0	0
Prohibited online content	0	1	0	1	0
RCMI - not an ad in media	1	0	0	1	0
Timing - cinema	4	2	5	2	0
Unsolicited mail and products	8	4	10	6	0
Wicked Campers - dislike of advertising	6	0	2	0	0
TOTAL	**1,322**	**1,564**	**2,121**	**1,642**	**1,168**

AGE RANGE OF COMPLAINANTS (%)

	2016	2017	2018	2019	2020
40 - 54	31.54%	34.64%	30.76%	34.90%	32.20%
30 - 39	21.38%	19.69%	17.17%	19.56%	19.31%
55 - 65	21.11%	23.69%	28.69%	21.39%	19.13%
> 65	5.02%	5.70%	7.74%	8.15%	12.47%
Unspecified	6.02%	6.55%	7.50%	8.74%	9.62%
19 - 29	13.22%	8.31%	6.93%	6.30%	6.45%
< 19	1.72%	1.42%	1.21%	0.97%	0.82%
TOTAL	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**

GEOGRAPHIC SOURCE OF COMPLAINTS (%)

	2016	2017	2018	2019	2020
NSW	30.60%	31.13%	33.17%	32.82%	29.27%
VIC	26.46%	28.14%	23.42%	23.81%	26.79%
QLD	19.62%	19.67%	24.73%	20.11%	19.73%
WA	10.77%	8.76%	7.50%	8.47%	10.38%
SA	6.61%	7.56%	7.39%	9.20%	9.02%
ACT	2.83%	2.01%	1.93%	2.39%	2.45%
TAS	2.06%	1.84%	1.15%	1.58%	1.69%
NT	0.43%	0.45%	0.21%	0.36%	0.54%
Unspecified	0.61%	0.45%	0.51%	1.26%	0.12%
TOTAL	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**

GENDER OF COMPLAINANTS (%)

	2016	2017	2018	2019	2020
Female	68.80%	63.81%	64.01%	66.02%	58.63%
Male	29.49%	34.29%	33.36%	31.64%	33.84%
Unspecified	0.34%	0.29%	1.54%	0.97%	6.20%
Couple	1.36%	1.61%	1.09%	1.37%	1.33%
TOTAL	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**

METHOD OF COMPLAINT (%)

	2016	2017	2018	2019	2020
Online	93.91%	93.42%	92.16%	91.49%	92.77%
Referral from Free TV *	-	-	-	-	6.36%
Post	6.09%	6.58%	7.41%	7.31%	0.84%
Fax	0.00%	0.00%	0.43%	1.20%	0.03%
TOTAL	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**

* new category created in 2020

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