



# Public perceptions of harm and offence in UK advertising

Research conducted by  
Ipsos MORI on behalf of the  
Advertising Standards Authority  
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# Contents

<b>1. Executive summary .....</b>	<b>2</b>
1.1 Background, objectives and methodology .....	2
1.2 Summary of key findings .....	2
<b>2. Background and methods .....</b>	<b>8</b>
2.1 Background .....	8
2.2 Research objectives .....	8
2.3 Methodological approach .....	9
2.4 Interpreting the data .....	9
2.5 Publication of the data .....	10
2.6 Acknowledgements .....	10
<b>3. Harm and offence in advertising – the broader context .....</b>	<b>11</b>
3.1 General perceptions of advertising .....	11
3.2 Experiences of advertising .....	12
3.3 Wider perceptions of harm and offence in the media .....	15
3.4 Views on media regulation .....	16
<b>4. Offence in advertising .....</b>	<b>18</b>
4.1 Spontaneous views of offence in advertising .....	18
4.2 Recent experiences of offence in advertising .....	22
4.3 Types of offensive content .....	23
<b>5. Harm in advertising .....</b>	<b>26</b>
5.1 Spontaneous views of harm in advertising .....	26
5.2 Types of harm in advertising .....	27
<b>6. The role of context and tone in harm and offence .....</b>	<b>30</b>
6.1 Placement and timing .....	30
6.2 Tone .....	31
6.3 The importance of the product being advertised .....	33

<b>7. Potential harm to children through advertising .....</b>	<b>35</b>
7.1 General public and parental views .....	35
7.2 Adverts that bother children .....	36
7.3 Protecting children of different ages .....	42
7.4 The role of parents .....	43
<b>8. Specific types of harm and offence .....</b>	<b>45</b>
8.1 Sexual content and nudity .....	45
8.2 Body image .....	46
8.3 Gender portrayal and stereotyping .....	47
8.4 Adverts for sex shops and lap dancing clubs .....	48
8.5 Charity and public service adverts .....	52
8.6 Violent or scary adverts .....	53
8.7 Commercialisation and misleading adverts .....	54
8.8 Less prominent concerns .....	55
<b>9. Understanding perceptions of harm and offence .....</b>	<b>57</b>
<b>Appendix 1 – Views of specific adverts.....</b>	<b>58</b>
<b>Appendix 2 – Results of adjudications on specific adverts.....</b>	<b>66</b>
<b>Appendix 3 – Topline results .....</b>	<b>72</b>
<b>Appendix 4 – Scoping phase .....</b>	<b>79</b>

# **Executive summary**

# 1. Executive summary

## 1.1 Background, objectives and methodology

The ASA commissioned Ipsos MORI to conduct research into the public's views on what is harmful or offensive in UK advertising. The ASA Council and the ASA and CAP Executive need evidence about public perceptions to inform their decision-making on matters of harm and offence. Specific rules in the Advertising Codes require them to make judgements based on prevailing standards in society.

Recent research on the public's views on and understanding of offence and harm in advertising is limited. Commissioning more was a key recommendation for the ASA from the Bailey Review '*Letting Children be Children*<sup>1</sup>', which asks the ASA to test with parents the standards it applies to advertising.

Key objectives of the research were to explore:

- What people (including children) find **offensive** in advertising and why, including examples of different types of potential offence and the role of contextual factors in shaping views;
- What people (and particularly parents) feel is inappropriate or **harmful for children** to come into contact with through advertising, with the emphasis on sexual imagery;
- The role of **context, humour, timing, language, images, placement** and **different media** in shaping views of what is offensive and/or inappropriate; and,
- Whether children should always be **defined as those under 16** when it comes to advertising regulation.

A mixed methodological approach was used to answer the research objectives. This included qualitative research with the general public, parents, and children aged 8-15, alongside quantitative surveys with both the general public and children aged 11-16.

This report summarises the findings from all strands of the research.

## 1.2 Summary of key findings

The level of offence people experience in advertising was in line with that found in similar quantitative research ten years ago. This is despite considerable changes in the media and advertising landscape over the same period.

Most participants in the qualitative research had not been personally offended by an advert recently. They were more likely to cite concerns about offence on behalf of others rather than personal offence. Protecting children from potential harm was a key priority for both parents and non-parents alike.

Participants felt that the wider media showed stronger harmful and offensive content than advertising. However, there were concerns about harm and offence in advertising, particularly when advertising was seen as playing a role in exacerbating or reinforcing other negatively viewed material in the wider media.

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<sup>1</sup> <https://www.education.gov.uk/publications/eOrderingDownload/Bailey%20Review.pdf>

Spontaneous examples of harmful and offensive material in advertising included sexual content, portrayal of body image, hard-hitting charity adverts, gender stereotyping, glamorising violence, and harm from products being advertised, although participants were often not able to think of recent examples that concerned them.

Where participants expressed concerns they were often not about specific adverts, but more generally about the role advertising plays in influencing culture. This included discussion about how advertising promotes commercialisation, sexualisation and the portrayal of unrealistic body images.

## Perceptions of advertising

Advertising was seen as an inescapable part of everyday life. Participants felt they were coming across more and more advertising on a broader range of media, often to the point of feeling overwhelmed. As a result, many reported rarely having a strong response to advertising, either positive or negative, preferring to ignore adverts where possible.

Even so, participants were able to think of examples of adverts they liked (because they were informative or entertaining) as well as those they disliked (because they were annoying or misleading).

## Harm and offence in the media generally

Concerns about harmful and offensive content in advertising were often linked to more general concerns about similar material across the media. This cut both ways in terms of how advertising was perceived:

- There was general agreement that advertising was **not the worst offender** when it comes to harmful and offensive material. Many websites, films, computer games and television programmes were seen as containing material which participants were much more concerned about.
- But advertising can be seen to **exacerbate or reinforce** other negatively viewed content, even where individual adverts are not seen as particularly offensive or harmful. For example, some participants attributed a role to advertising generally in promoting the increasing commercialisation and sexualisation of society, even though other media contains stronger examples of this type of content.

## Types of harm and offence in advertising

The main types of harm and offence adult participants were concerned about are outlined below, in no particular order. This summarises spontaneous views, those prompted during the discussion, and participants' reactions to specific examples of adverts that were the subject of complaints to the ASA. Further details about general public and parental views around potential harm to children are included later in this summary.

- **Sexual content and nudity.** A few participants had concerns about sexual content and nudity in advertising, particularly where they could see no link between sex and the product being advertised. However, many were not worried by the current level of sexual content and nudity in advertising per se, describing it as relatively inoffensive compared to other types of media.
- **Portrayal of body image.** There were widespread spontaneous concerns about the portrayal of unrealistic body image in advertising, and this was seen as both

offensive and harmful by many participants, particularly women. Despite this, only a minority felt that specific examples of these adverts should be banned. Instead, these adverts were seen as contributing to a broader culture where women – and particularly girls – can be made to feel bad about themselves.

- Adverts which depict **gender stereotypes** were also mentioned spontaneously, with concerns about women in particular being objectified and men being portrayed as stupid or engaging in juvenile behaviour.
- **Charity and public service adverts.** Some participants argued that these adverts can go too far, using distressing content to make people feel upset or guilty in a way that was considered inappropriate. Others felt these adverts should have more scope to shock because of their worthwhile aims. There were also widespread concerns about the impact of these adverts on children.
- **Violent and scary content.** Few adults reported having been offended by this in advertising recently. Concerns were more focused on adverts for violent films and computer games, and their potentially harmful impact on children and young men.
- **Adverts for sex shops and lap dancing clubs.** These were not a spontaneous concern for participants. Most did not find the examples they were shown personally offensive, but views were more divided about whether they were harmful to children or not. On balance, participants in the qualitative workshops felt that these types of adverts could be shown provided there were appropriate restrictions on placement, language and imagery. Findings from the quantitative survey suggest that people are instinctively more evenly split on whether these adverts should be allowed in public or not. However, looking at examples of this type of advert makes a significant difference: most of those who viewed examples as part of the survey thought it was acceptable for these adverts to be shown in public with appropriate restrictions.

Participants identified some changes in the types of harmful and offensive content in advertising. For example, the negative portrayal of minority groups was seen as a declining issue. However, adverts that stray into this territory would be a major concern if they re-emerged.

## Personal offence in advertising

Offence in advertising was initially seen by participants as any strong negative emotional response to advertising. Participants typically relied on their instinctive reactions when deciding whether an advert was offensive or not, rather than having a clear definition of offence in mind. As such, many of their initial examples of offence covered other concerns about advertising, including adverts that were inappropriate, misleading, or irritating.

Most participants said they agreed with the definition of offence provided during the discussion (something which made them personally angry or upset because it was perceived to be insulting, unfair or morally wrong). There was some debate about whether being made to feel uncomfortable was enough to make something offensive or whether the reaction needed to be stronger.

In the quantitative research, around one in six adults (16%) said they had been personally offended by an advert in the last twelve months across a range of media. This is slightly lower than the proportion (19%) who had been offended when similar research was conducted in 2002.

Among the 16% who were offended, the main reasons cited were sexual imagery (20% of those offended), sexism about women (19% of those offended), aggressive selling (17% of those offended) and violence (11% of those offended). The research therefore suggests that only very small minorities of adults had been offended in any one of these ways in the last year (no more than 3% for each type of offence).

Similarly, only a minority of participants in the qualitative research said they had been personally offended by an advert recently. Experiences of personal offence usually resulted from advertising content that clashed with participants' underlying values (e.g. the sexualised portrayal of women), or touched on issues they were uncomfortable engaging with (e.g. distressing content in charity or public service adverts).

Many participants were unable to identify specific adverts they had found personally offensive. Some said they were not easily offended by anything in the mainstream media. Others had been offended by media content but not by advertising, or said they did not pay enough attention to adverts to be offended by them.

The level of offence reported by participants in response to adverts varied. Many participants seemed to perceive a threshold in terms of their reaction at which point an advert moved from being inoffensive to offensive.

### **Offence on behalf of others**

Offence on behalf of others people was more common than personal offence across both the qualitative and quantitative research.

During the qualitative research this included two distinct types of responses:

1. **Emotional responses:** participants were concerned or upset because they could see why other people would be bothered by an advert, and felt that those people would be right to be offended.
2. **Rational responses:** participants were able to recognise content that they knew would offend or upset others, even if they could not engage emotionally with that point of view.

Previous quantitative research for the ASA found that offence on behalf of others was a predominantly rational reaction. This project suggests that offence on behalf of others can be both rational and emotional. Indeed, the strongest concerns on behalf of others resulted from emotional rather than rational responses.

### **Harm in advertising**

As the discussion progressed, participants recognised that many of their initial concerns about advertising were actually about harm rather than offence. Rather than using the term harm they were more likely to talk spontaneously about whether adverts were inappropriate, unsuitable or misleading.

Most participants struggled to distinguish between potential harm resulting from the product or brand being advertised, and potential harm from adverts themselves. Advertising that promoted what participants perceived to be potentially harmful products (alcohol, gambling, short-term loans and high fat, salt, and sugar (HFSS) food) provided the main spontaneous examples of harm in advertising.

Participants were not usually concerned with harm that might be caused to them personally as a result of advertising (reflecting their reluctance to acknowledge the influence of advertising generally). Instead they worried about harm to others, particularly children.

The key concerns that emerged over the course of the discussions were:

- **Harm to vulnerable people** from specific adverts or campaigns designed to take advantage of them, including misleading adverts or adverts with aggressive selling techniques (often for products participants felt were harmful regardless of the content of the advert).
- **Harm to wider society** through advertising generally. Many participants attributed a role to advertising in exacerbating or reinforcing potentially harmful content available elsewhere in the media.

Examples of potential or existing harm to society through advertising included gender stereotyping, glamorising violence, the portrayal of body image and concerns about increasing materialism. Advertising was not seen as the sole or most serious cause of harm in these areas, with other types of media usually considered more to blame.

### **Potential harm to children through advertising**

All participants were conscious of the potential for harm to children through advertising. Concerns were consistent across parents and non-parents in both the qualitative and quantitative research. The main difference for parents was that these issues were more immediate – they were able to point to recent examples of adverts they had concerns about.

There were different views about the right balance of responsibility between regulation and parental oversight in protecting children from harmful advertising. Many participants advocated a relatively strong regulatory approach because they felt not all parents take their responsibilities for protecting their children seriously enough. Some parents also argued that regulation was important because they did not feel able to monitor all contact their children might have with advertising.

Overall, most participants felt that both regulation and parental responsibility had a role to play in protecting children, and assumed that some form of regulation like this already exists. A minority were comfortable with a less regulatory approach, allowing parents to deal with these issues in the way they feel is most appropriate for their children.

Qualitative participants felt that children need protection from different types of potentially harmful content at different ages. However, given their limited understanding of advertising regulation, they could not envisage how this more nuanced approach would work in practice.

In the quantitative research most respondents preferred having a single set of rules for all those under 16, while a significant minority supported tailored rules for different ages. Based on the qualitative research, this tendency towards a single set of rules may in part reflect low awareness of how advertising regulation works in practice.

The types of potential harm to children that participants worried about included hard-hitting charity and public service adverts, body image, the sexualisation and commercialisation of children, and glamorising violent or dangerous behaviour.

As such, there was some overlap with the following concerns discussed by children themselves:

- Most children spontaneously mentioned **charity adverts** as those which had upset or bothered them or younger siblings recently. Some felt upset by the adverts themselves, while others were worried because they wanted to help the cause but were unable to do so. These adverts were also a particular concern for parents.
- Many children viewed **sexual content and nudity** as funny or inappropriate for children younger than them. Those who said they were bothered tended to be embarrassed rather than confused or upset. However, some younger children admitted that they did not always understand what was going on in these adverts.
- Girls were reluctant to admit the impact of adverts showing idealised **body images** on them personally. Instead they tended to talk in more general terms about advertising putting pressure on people to look a certain way. Portrayal of body image was much less of a worry for boys.
- **Violent or scary adverts**, particularly film and game adverts, were mentioned as an issue in a few cases. Girls were more likely to say they had been bothered by these than boys.

Three in ten (30%) children aged 11-16 surveyed said they had been bothered by an advert in the last 12 months. Sexual, violent and scary content were the main reasons for being bothered by specific adverts.

## Regulating harm and offence

Overall, participants' views of adverts that had been the subject of complaints were broadly in line with the decisions taken by the ASA.

Restrictions on placement and timing were often considered sufficient to address participants' reservations about harmful and offensive content in the specific adverts tested. Banning adverts was only seen as necessary in extreme cases (based on participants' experiences and the adverts tested during discussions). Tone was important too, with humour and fantasy able to reduce offence in some cases, although not when participants felt strongly about an issue.

The subjective nature of offence meant that participants struggled to develop clear criteria for how to regulate adverts. Participants' main spontaneous priorities were protecting children and the most vulnerable from harm. They felt regulation should also consider the number of people who complain about any individual advert, and how serious the level of offence or potential harm is for any particular group.

## 2. Background and methods

### 2.1 Background

The Advertising Standards Authority (ASA) is a not-for-profit organisation. It regulates advertising across all media, ensuring that it complies with the UK Advertising Codes. The ASA Council decides whether advertisements breach the Advertising Codes. The Committee of Advertising Practice (CAP) is responsible for writing the Advertising Codes, helping to enforce ASA rulings and providing compliance advice to the industry.

In late 2011, the ASA commissioned Ipsos MORI to conduct research into the public's views on what is harmful and offensive in UK advertising. The ASA Council and the ASA and CAP Executive need evidence about public perceptions to inform their decision-making on matters of harm and offence. Specific rules in the Advertising Codes require them to make judgements based on prevailing standards in society.

In 2002 the ASA conducted research into *'The Public's Perceptions of advertising'*<sup>2</sup> and *'Serious Offence in Non-broadcast Advertising'*<sup>3</sup>. The report on serious offence identified two distinct types of offence:

- Emotional offence, which is more likely to be personal and serious.
- Rational offence, which tends to be on behalf of others.

While some of these concepts developed during this earlier research may still be useful, the findings are now largely out of date.

Over the last few years there has been little research exploring harm and offence in advertising. Commissioning more was a key recommendation for the ASA from the Bailey Review *'Letting Children be Children'*<sup>4</sup>, which asks the ASA to test with parents the standards it applies to advertising. While the recommendations from the Bailey Review focus on exploring the sexualisation and commercialisation of childhood, an improved understanding of perceptions of harm and offence in advertising more generally will be invaluable to the ASA.<sup>5</sup>

### 2.2 Research objectives

Key objectives of the research were to explore:

- What people, including children, find **offensive** in advertising and why, including examples of different types of potential offence and the role of contextual factors in shaping views;

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<sup>2</sup> [http://www.asa.org.uk/Regulation-Explained/~media/Files/ASA/Reports/ASA\\_Public\\_Perception\\_of\\_Advertising\\_Feb\\_2002.ashx](http://www.asa.org.uk/Regulation-Explained/~media/Files/ASA/Reports/ASA_Public_Perception_of_Advertising_Feb_2002.ashx)

<sup>3</sup> [http://www.asa.org.uk/Resource-Centre/~media/Files/ASA/Reports/ASA\\_Serious\\_Offence\\_in\\_NonBroadcast\\_Advertising\\_July\\_2002.ashx](http://www.asa.org.uk/Resource-Centre/~media/Files/ASA/Reports/ASA_Serious_Offence_in_NonBroadcast_Advertising_July_2002.ashx)

<sup>4</sup> <https://www.education.gov.uk/publications/eOrderingDownload/Bailey%20Review.pdf>

<sup>5</sup> Complaints to the ASA about the perceived negative impact of an advert on children make up a small minority of the overall number of complaints: from 2008-2010 just 4.6% of the advertisements that drew complaints and 10% of the complaints overall were on the grounds of their impact on children.

- What people (and particularly parents) feel is inappropriate or **harmful for children** to come into contact with through advertising, with the emphasis on sexual imagery;
- The role of **context, humour, timing, language, images, placement** and **different media** in shaping views of what is offensive and/or inappropriate; and,
- Whether children should always be **defined as those under 16** when it comes to advertising regulation.

## 2.3 Methodological approach

It was agreed with the ASA that a mixed methodological approach would be the best way to fully answer the research objectives. To this end, qualitative workshops and discussion groups were conducted, along with quantitative surveys with both the general public and children aged 11-16.

Prior to the research with the public, a scoping report was produced and delivered to the ASA, which outlined previous work in this area and the public understanding of what constitutes harm and offence. The scoping report is included in the appendices of this report.

The full research design was as follows:

- Five deliberative workshops during February 2012, each with around 20 participants. These were held across the UK in London, Conwy, Edinburgh, York, and Lisburn. Quotas were set to ensure participants reflected the local population in each area.
- Four mini discussion groups with religious participants held during April 2012; two in London with Christians and two in Leicester with Muslims to ensure their views were reflected in the findings.
- Qualitative research with children and parents conducted during April 2012. This included six friendship groups amongst same-sex classmates in years eight, nine, and ten, and four family groups with children in either year six or year seven. These were held in Brighton, Stockport, Belfast, Falkirk and Swansea.
- A face-to-face survey with 1,000 members of the general public and an additional booster of parents on Ipsos MORI's 'Capibus' survey vehicle between 30 March – 5 April 2012. In total, 1,288 members of the public were interviewed including 540 parents of children aged under 16.
- An online survey with 1,020 children aged 11-16 between 5 – 17 April 2012.

The example adverts used as stimulus during the qualitative research were chosen from a long list of adverts – most supplied by the ASA – that had been the subject of complaints from members of the public. Ipsos MORI grouped the long list of adverts into key themes in terms of potential harm and offence, and compiled a short list of adverts intended to generate the best discussions around these issues. This list was then agreed with the ASA.

Further details of the adverts used during the discussions are included in the appendices to this report.

## 2.4 Interpreting the data

This report includes findings from both qualitative and quantitative research. Given that the focus of the research objectives was to explore experiences and perceptions of harm and offence in detail, the report is largely structured around the findings from the qualitative

research. However, it is important to be clear on the relative strengths of the different elements of the project in building up an overall picture of public views on these issues.

### **Notes on qualitative research**

Qualitative research approaches (including deliberative methods) are used to shed light on *why* people hold particular views, rather than *how many* people hold those views. Such research is intended to be illustrative rather than statistically reliable and, as such, does not permit conclusions to be drawn about the *extent* to which something is happening. In the case of this study, we intended to develop an in-depth understanding of the public's views of harm and offence in advertising.

Where possible we have stated how common a particular view was amongst participants, but for findings based on the qualitative research, these proportions should be considered indicative, rather than exact.

Throughout the report, verbatim comments have been included to illustrate particular viewpoints. Where this is the case, it is important to remember that the views expressed do not always represent the views of all participants, however, they can illustrate where there was a particular strength of feeling among participants.

### **Notes on quantitative findings**

Quantitative research approaches are designed to give statistically reliable findings based on a representative sample of the population.

Figures quoted in graphs and tables are percentages. The size of the sample base from which the percentage is derived is indicated. Note that the base may vary and the percentage is not always based on the total sample. Caution is advised when comparing responses between small sample sizes.

Where an asterisk (\*) appears it indicates a percentage of less than one, but greater than zero. Where percentages do not add up to 100% this can be due to a variety of factors – such as the exclusion of 'Don't know' or 'Other' responses, multiple responses or computer rounding of the decimal points up or down. Computer rounding may also lead to a one percentage point difference in combination figures (such as total agree or disagree) between those in the text and in the charts.

## **2.5 Publication of the data**

As with all our studies, these findings are subject to Ipsos MORI's standard Terms & Conditions of Contract. Compliance with the MRS Code of Conduct and our clearance/approval of any copy or data for publication, web-siting or press release which contains any data derived from Ipsos MORI research is necessary. This is to protect your reputation and integrity as much as our own. Such approval would only be refused on the grounds of inaccuracy or misinterpretation of the findings.

## **2.6 Acknowledgements**

Ipsos MORI would like to thank our clients at the ASA: Lynsay Taffe, Vena Raffle, Laura Walker, and Guy Parker for their support and advice on this project, as well as all the members of the public who took part in the workshops, groups and surveys.

## 3. Harm and offence in advertising – the broader context

### 3.1 General perceptions of advertising

Participants described advertising as an inescapable part of everyday life. The level of contact with advertising varied considerably depending on individual media usage. However, most participants felt that they were now coming across more advertising than they had in the past. They also pointed out that advertisers are using an increasing range of channels to get their message across in new and inventive ways.

**“You can’t avoid ads, we’re surrounded by them.”**

Male, York

This perception of constantly being bombarded by different types of advertising left participants feeling overwhelmed. As a result, some felt they had become desensitised to adverts in general. Many claimed not to notice much of the advertising on posters, newspapers, websites, or the radio, and said they tried to avoid or ignore adverts wherever possible.

**“I think I just switch off. When you’re looking at a newspaper and there’s an advert, you don’t even look, you just move on, don’t you?”**

Male, Conwy

Most participants did not like to think that they were significantly influenced by advertising themselves. However, they acknowledged adverts must impact on consumer behaviour for companies to continue spending money in this way. Some were also able to give examples of adverts – typically for trusted brands or products that caught their attention – which they recognised did encourage them to change their purchasing behaviour.

**“BMW ads are really classy – make you think you should buy one.”**

Female, Lisburn

In addition to feeling inundated by advertising, participants said that poor quality or repetitive adverts annoyed them. This was seen as more noticeable and harder to avoid on television than other media. There were also spontaneous concerns about adverts for products and services that participants considered misleading or harmful for particular groups of people. For example, there were concerns about adverts for short-term loan services, gambling, alcohol and HFSS food.

Although these perceptions were prominent, advertising was seen as having some benefits for consumers. On prompting, participants said that adverts gave them valuable information about products and offers, as well as providing entertainment, and acting as a talking point. A few mentioned the role of advertising in subsidising the cost of media content such as newspapers, magazines and television.

At its best, advertising was seen as stimulating, even thought-provoking, and participants said they were happy to see or listen to some adverts multiple times.

**“Catchphrases make it memorable, like “simples” from the Compare The Market advert.”**

Female, London

**“You’d be so bored on the Underground if it wasn’t for all those adverts.”**

Male, Conwy

Participants viewed advertising as distinct from other types of media content because it has a specific purpose – to sell products and brands. This clear agenda meant some participants said they were cynical about advertising, while others said they did not take it as seriously as other types of media content.

But despite this distinctive character, advertising was not viewed in isolation. Perceptions of advertising were shaped by views of the wider media, cultural and societal context in which it operates, and this will be discussed further later in the report.

### 3.2 Experiences of advertising

Overall, participants said that most of the advertising they come across does not generate a conscious reaction – positive or negative – but simply passes them by because they encounter so much through different media. This reported lack of engagement reflects the perception of being desensitised to advertising in general. Even so, participants of all ages were able to think of both positive and negative examples of adverts they have come across.

Positive examples included adverts that grabbed their attention (through catchy music or striking imagery), or that are clever or funny in some way, along with adverts for products or brands that interest them (particularly new products or special offers).

**“There are various programmes dedicated to the 100 greatest adverts, and some of them, you go ‘oh yeah, I remember that’.”**

Male, Conwy

Teenagers taking part in the friendship groups were able to recall advertising campaigns that they had found funny or entertaining. Some also reported discussing these adverts with friends and family, and sharing them with peers through social media.

**“Yeah, my friend tells me to take a look at good adverts on YouTube...”**

Girl, Friendship Group, Brighton

There were plenty of negative experiences too, mostly focusing on irritating adverts or campaigns. Participants were not always able to agree on the types of adverts that they found annoying, but almost all were able to think of specific examples they disliked. Irritating music and extensive repetition were frequent complaints for television adverts. Across different media, adverts seen as having cheap production values were also a source of

frustration, at least in part because well-made adverts were associated with established and trusted brands.

**“There’s an associated credibility. If it’s on TV then the company’s spent 7 figures on it – so it must be an established company.”**

Male, London

The nature of the medium is important in shaping the extent to which participants engage with different types of advertising. For example, television and some online adverts were considered higher quality, with moving images and music. As a result participants said they paid more attention to these television and online adverts than they do to other types of advertising. Overall, participants said that they find it easier to ignore individual print and outdoor adverts.

### Television advertising

Television is the most common medium through which people come into contact with advertising, and the source of most of the memorable examples (both positive and negative) referred to by participants. Seven in ten adults (72%) in the quantitative research said they had come into contact with advertising through television in the last year. Indeed, when discussing adverts, participants in the qualitative research typically had to be prompted to think of examples beyond television.

However, people’s experience of advertising on television is changing. Technology has expanded the ways in which people are able to access television programmes, moving from viewing only when programmes are being broadcast to access anytime through online services and digital recording. While not all participants said they were using these services they are becoming increasingly common.

As a result of these changes participants reported very different experiences with advertising on television over recent years. For some, their increased use of on demand services and recorded television meant that they were largely able to avoid television adverts. In fact, many participants with recordable television actually start watching programmes slightly later in order to watch the programme without interruption from adverts.

**“I got Sky TV just to fast forward through the ads.”**

Female, York

For others, however, the arrival of digital television and its growing number of channels has led to greater exposure to television advertising. These new channels were perceived to use adverts differently than the more familiar channels previously on terrestrial television. In particular, there was frustration that the same few adverts tended to be repeated on newer digital channels. This was exacerbated by participants’ concerns that the products advertised on these channels – particularly during the day – were designed to target vulnerable consumers (for example adverts for compensation claims and payday loans).

**“The timing [of adverts] is poor on the digital channels; they seem to be more lax.”**

Male, Edinburgh

Some participants expressed spontaneous concerns that greater flexibility in watching television, whether recorded or on-demand, has the potential to make the traditional watershed increasingly redundant.

**“My [12 year old] daughter’s really into Glee and it’s on at 9pm at night. Occasionally I do let her record it and watch it but I haven’t got a clue what adverts are in it as I can’t stand the programme.”**

Female, Parent, Stockport

For example, participants were unsure whether programmes usually broadcast after 9pm but accessed on-demand might include adverts that would only be appropriate for post-9pm audiences.<sup>6</sup>

## Online advertising

Advertising online is an increasingly important feature of most people’s lives. Participants discussed a wide range of ways they come into contact with adverts online, for example on websites, by email, via Smartphone apps, and through social media.

Younger participants in particular said they were irritated by adverts they are obliged to watch before programmes via on-demand services or on gaming websites. Parents and participants in the adult groups were less likely to come into contact with adverts online. Those who did pointed to concerns about the security of the personal information collected to tailor advertising online, as well as worries about misleading adverts.

**“Facebook ads can be tailored to your interests, which is sort of good, but they must get your information to do that.”**

Male, Conwy

**“My big problem with adverts is the ones on the internet. They are misleading as they say things are free but you actually have to sign up for things with a credit card and then you can’t cancel. That is offensive.”**

Male, Lisburn

## Advertising through other media

Participants mentioned a wide range of other media through which they come into contact with advertising, including newspapers and magazines, at the cinema, outdoor advertising in different locations, and radio advertising.

Experiences and perceptions of advertising varied a great deal depending on the extent to which participants used different media. For example, some said they looked at adverts in a newspaper most days, while others reported only engaging with advertising on television.

The level of contact participants had with outdoor advertising in public spaces differed depending on where they lived. People who lived in cities and large towns were much more likely to see advertising on posters or billboards than those who lived in smaller towns or

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<sup>6</sup> Adverts shown during on-demand content must be tailored for a download audience rather than reflecting the original broadcast timing.

rural areas. Participants in rural areas said they predominantly experienced advertising through the internet, television and in newspapers and magazines.

**“They don’t let us put posters up in Conwy, we wouldn’t know.”**

Male, Conwy

Participants came into contact with cinema adverts less frequently, and often discussed film trailers rather than other types of commercial advertising, much of which they had already seen on the television.

### 3.3 Wider perceptions of harm and offence in the media

This research focused in detail on harm and offence in advertising, but the public’s views on advertising specifically have to be understood in the context of their perceptions of harm and offence across the media landscape.

Throughout the research it was clear that many participants were uneasy about the amount of content they considered harmful or offensive in the media generally.

In discussing harm and offence in the media, participants made a clear distinction between different types of material:

- **Content that is always unacceptable:** this should be banned or carefully restricted (e.g. discrimination against specific types of people, misleading content).
- **Content suitable for adults:** this should be available to adults provided the nature of the content is made clear at the outset, ensuring children are adequately protected (e.g. horror films, violent computer games, sexually explicit material).

Initial discussions about harm and offence in the media generally focussed around a pre-task set for participants. This exercise required them to make a note of anything they thought was either offensive or harmful during the week prior to the workshop.

Some participants said that they had not come across anything specific they found offensive or thought would be harmful in the run-up to the workshops, even though they reported being worried in general about this type of material in the media. Participants spontaneously mentioned sexual content, violence, bad language, disturbing images in news reporting, and different types of people being portrayed negatively.

While there were concerns about both harm and offence, participants’ examples suggested they were more worried about harmful content being viewed by children than about adults being offended. This was because most participants felt in control of their own media consumption, and said they simply avoided the types of content they would be offended or upset by.

**“There’s an off button. I don’t like it so I don’t watch it.”**

Female, York

These general concerns about harm and offence focused on examples of stronger material appearing in unexpected or inappropriate places. For example, on websites or during television programmes generally considered suitable for family viewing, or in newspapers or magazines that children might read. This was seen as particularly problematic because

adults who want to avoid this type of content would be unable to, and more because children may come across things participants considered inappropriate or harmful.

Participants recognised that what offended them personally was to a large extent subjective, even if there was some overlap in the issues that bothered different people. There was more consensus on the types of content that are considered harmful for children, including overtly sexual imagery and innuendo (which participants worried could be understood by older children), unrealistic body image, extreme violence, and anything that encourages children to grow up 'too quickly'.

There was broad agreement that advertising does not represent the 'worst offender' when it comes to harmful and offensive media content. Other media content such as pre-watershed soap operas, computer games, websites and newspapers were all spontaneously seen as including content that was more problematic than advertising.

**“I mean you get Eastenders and all that and they’re necking a bottle of vodka at 16. A 16 year old’s going to say ‘oh that’s the thing you do, you neck a bottle of vodka’.”**

Male, Edinburgh

Another theme was concern about the music channels that are available all day on digital TV. Music videos were often cited as examples of sexually explicit and adult content unsuitable for children. There were similar concerns about inappropriate performances on talent and other entertainment shows that children were likely to be watching.

**“The Brit Awards, it should be for the whole family to watch. I think the clothes and outfits are a wee bit too revealing for a family to watch.”**

Female, Edinburgh

It is important to bear these broader concerns in mind when considering views of harm and offence advertising. For example, certain types of advertising were perceived to exacerbate or reinforce other types of media content that concerned participants, even if individual adverts were considered relatively harmless or inoffensive. This will be considered in more detail in chapter 5 in the discussion of participants' perceptions of harm to society from advertising.

### 3.4 Views on media regulation

Opinion was divided on whether 'something should be done' to reduce the amount of offensive and harmful content in the media overall. Many were reluctant to accept the status quo and wanted to see the amount of offensive and harmful content reduced, while acknowledging that perceptions of these issues are personal and subjective.

Others argued that the focus for regulation should be on ensuring individuals can choose what they consume, and enabling parents to protect their children. A minority were reluctant to advocate more restriction on media content as this might have implications for freedom of speech, something they prized highly.

**“It’s a free society, free speech is very important.”**

Female, York

Views on how strong media regulation should be were linked to participants’ underlying political and philosophical beliefs rather being different across age groups, regions or based on whether they were parents or not.

There was an underlying expectation that media regulation happens and should continue to happen, although the details of how this works were unfamiliar to almost all participants. Even those advocating a more liberal approach to media content seemed to assume a basic level of regulation would be in place to protect adults and children from coming across harmful or offensive material in unexpected places.

**"Bus shelter ads are quite aware about how far they can take it."**

Female, Conwy

## 4. Offence in advertising

### 4.1 Spontaneous views of offence in advertising

Offence was a familiar idea for participants, but it was also one they recognised as complex and difficult to grasp. This challenge in understanding and defining offence meant that participants tended to rely on their instinctive reactions – they knew whether something was offensive or not when they saw it, even if they could not always describe their reasons for being offended in detail.

Participants' early discussions about offence in advertising reflected this reliance on instinctive responses, and therefore covered a wide range of concerns. Their initial understanding of offence included anything that caused them to have a strong negative reaction towards advertising. As such, not all of the issues discussed fitted with the definition of offence used later in the discussion.

The main examples of *potential* types of offence in advertising cited by participants at this stage are listed below (in no particular order):

- Sexual content and nudity
- Body image
- Innuendo and bad language
- Negative stereotypes of specific groups, particularly women
- Violent or scary content
- Distressing or shocking imagery
- Misleading or aggressive adverts
- Adverts for products participants thought were harmful or inappropriate
- Repetitive or annoying adverts

Not all of these initial concerns emerged as significant themes in terms of offence as the discussion continued. For example, there were few specific mentions of bad language in advertising. Similarly, while the portrayal of certain groups was seen as a problem in the wider media it was not considered a particular issue in advertising.

#### Personal offence

Some participants said they had come across adverts that they found personally offensive. Examples included content described as distasteful, inappropriate, annoying, unfair, frightening and misleading.

The examples participants gave typically resulted from an advert or type of advertising content that clashed with their underlying values, or touched on a subject they were uncomfortable engaging with. In addition, offence was often linked to more general concerns about the specific type of content in the wider media. Examples included overtly sexual imagery, the portrayal of women in advertising, body image, and the use of shocking or violent imagery.

As discussed in the previous chapter, advertising was not generally seen to provide the worst examples of offensive material under the categories mentioned by participants. Furthermore, the extent of the offence participants felt was lower than for other non-advertising content they had come across. However, there were some spontaneous concerns about these issues related to adverts participants had come across recently. The specific types of offence mentioned will be outlined in more detail later in this chapter.

Given the range of issues discussed, it is perhaps unsurprising that participants struggled to develop a simple definition of offence. Participants most often said that being offended meant feeling negatively about something in a way that is strong and instinctive.

The level of offence reported by participants in response to adverts varied. Many participants seemed to perceive a threshold in terms of their reaction which moved an advert from being inoffensive to offensive. There was some debate about whether feeling uncomfortable was enough to make something offensive or whether the reaction needed to be stronger.

**“I don’t think it needs to make you angry, even if it just makes you uncomfortable then that’s offensive.”**

Male, London

**“Something that provokes an involuntary reaction is offensive.”**

Male, Edinburgh

Participants generally agreed with the definition presented to them during the discussion<sup>7</sup> as this helped clarify their understanding of offence. In particular, they emphasised the importance of having an emotional reaction to something before it can be considered personally offensive. There were different views on whether strongly disliking something was enough to make it offensive, but most agreed that an advert being inappropriate was not the same as it being offensive.

**“Anger and upset is the key. ‘Offensive’ is quite a high bar, so having the emotional response is what shifts it from being merely uncomfortable to offensive.”**

Female, London

**“I see lots of things that I don’t like but I’m not offended by them. If I was offended I’m hurt.”**

Female, Lisburn

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<sup>7</sup> Definition of offence: “Anger or upset caused by something perceived to be insulting, unfair or morally wrong”.

Many participants could not identify specific adverts they had found personally offensive. Some said this was simply because they were not easily offended by anything they came across in the mainstream media. Others had been offended by different types of media content but did not feel offence was a problem in advertising, or said they did not pay enough attention to adverts to be offended by them. Indeed, a minority found the idea of being offended by an advert far removed from their own experiences.

**“I wouldn’t say I’ve personally been offended, I would just see where some of it would be inappropriate.”**

Male, Conwy

However, some who could not remember being personally offended did find adverts offensive when shown specific examples later in the discussion.

**“I wouldn’t have thought I could be offended, but that [Jack Wills advert] is offensive.”**

Female, Lisburn

Participants therefore recognised that offence is personal and subjective, and were already beginning to see the challenges of regulating advertising (and media content more generally) in a way that balances the concerns of different types of people within society.

There were also some types of offensive material participants had come across through other types of media that they did not think were particular issues in advertising. For example, many were concerned about the negative portrayal of race, sexuality or religion in the media more generally, but found it difficult to think of examples of adverts that touched on these issues.

**“I can’t think of any adverts with religious connotations.”**

Male, Conwy

This suggested to many participants that the advertising landscape is to some extent self-regulating, in that advertisers are naturally cautious when it comes to some potentially offensive issues. They argued it would not be in the interests of a business to offend their potential customers, or associate their brand in any way with attitudes widely seen as unacceptable.

### **Offence on behalf of others**

In the qualitative research, participants more often said they had seen adverts they thought *others* might find offensive (or felt the example adverts shown to them would be offensive to other people). Being offended on behalf of others is a common finding when exploring offence in media content<sup>8</sup>.

Concerns on behalf of others were also in evidence in the general public quantitative survey; across all media, more respondents said they had seen adverts that might bother other people than those who had seen something which offended them personally.

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<sup>8</sup> [http://eprints.lse.ac.uk/5225/1/Harm\\_and\\_offence\\_in\\_media\\_content\\_-\\_executive\\_summary.pdf](http://eprints.lse.ac.uk/5225/1/Harm_and_offence_in_media_content_-_executive_summary.pdf)

When participants identified potential offence on behalf of other people – either spontaneously or in response to examples of adverts – this included two distinct types of responses:

1. **Emotional responses:** participants were concerned or upset because they could see why other people would be bothered by an advert, and felt that those people would be right to be offended.
2. **Rational responses:** participants were able to recognise content that they knew would offend or upset others, even if they could not engage emotionally with that point of view.

**“It [Antonio Federici advert] would offend Catholics certainly. I would ban it.”**

London, Male

**“I wouldn’t find it [Benetton religious leaders advert] offensive but religion is so important to some people, it’s part of their entire lives.”**

Female, York

These findings build on previous quantitative work conducted by the ASA in 2002, which characterised offence on behalf of others as a rational rather than emotional response. The qualitative research carried out during this project suggests that offence on behalf of others is more complex, and can be driven by both rational and emotional responses. Indeed, as would be expected, the strongest concerns on behalf of others resulted from emotional rather than rational responses.

## Offence and children

In the qualitative research children did not describe their negative experiences with advertising in terms of offence. Instead, they tended to talk about viewing specific adverts that were unsuitable for younger children or themselves to see, or about being made to feel uncomfortable or upset by something they had come across.

Many children in the qualitative research could recall coming into contact with an advert that bothered<sup>9</sup> them in some way. This covered a broad range of feelings, including being uncomfortable, confused, scared, embarrassed or upset.

This is reflected in the findings from the quantitative survey. A significant minority of young people (30%) said they had seen an advert that bothered them in the last twelve months.

These findings will be explored in more detail in chapter 7.

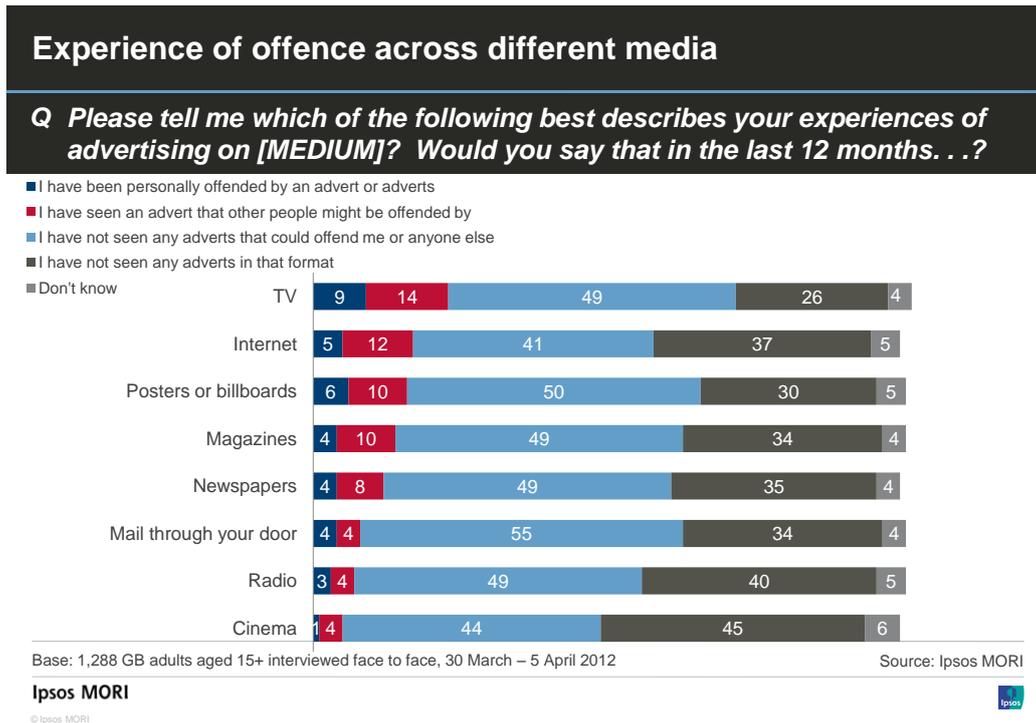
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<sup>9</sup> The term ‘bothered’ was used in both the qualitative and quantitative research with children. This has been found by previous studies on media harm and offence to be the most appropriate language to use when exploring what content upsets children.

## 4.2 Recent experiences of offence in advertising

In the quantitative research with the general public, around one in six adults (16%) said they had been personally offended by an advert or adverts in the last twelve months. This is lower than the proportion of children that said they were bothered by an advert over the same period of time.<sup>10</sup>

Television, outdoor (billboards and posters) and internet advertising had the highest proportion of respondents saying they had come across offensive adverts. In part this reflects the fact these are the most common media through which participants reported encountering adverts, but it also highlights concerns in the qualitative discussions about content on these media.



Older people (aged over 55) were significantly more likely than younger people (aged 15-34) to say they had been personally offended by advertising on television (12% and 4% respectively), and on posters or billboards (8% and 4%). Younger people were more likely to be offended on behalf of others when it comes to advertising on the internet (19% compared with 12% overall).

However, the pattern of personal offence is relatively consistent across demographic groups, allowing for some variation by the type of media used. There are also few significant differences in experiences of offence across different regions of the country.

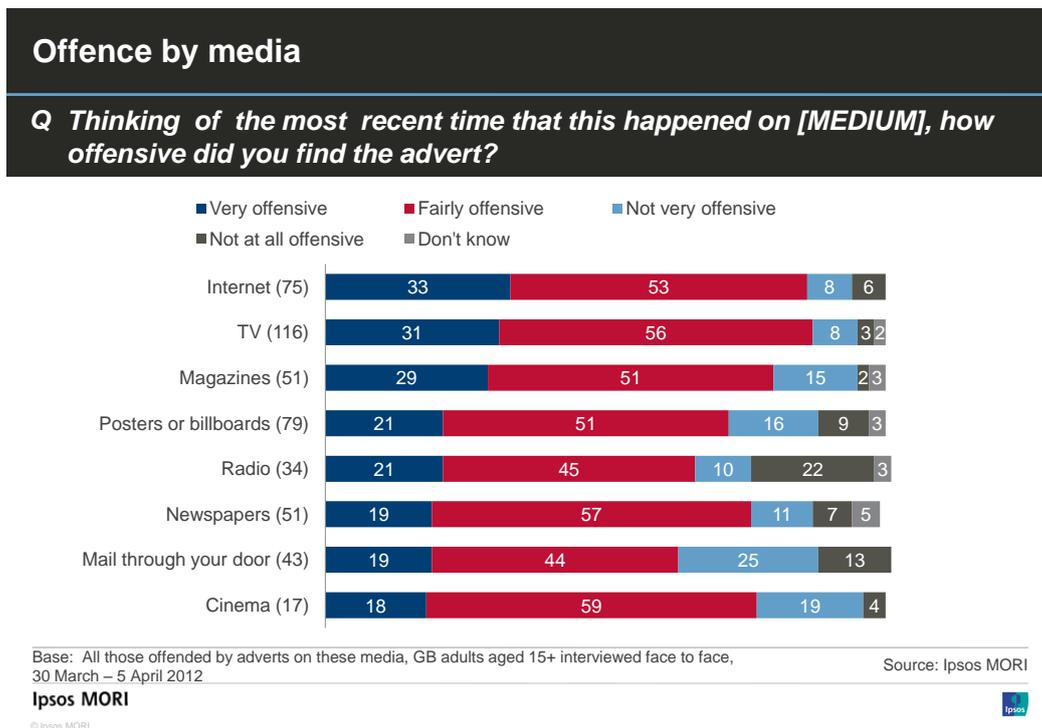
<sup>10</sup> However, this may in part be because the term 'bothered' – which is more appropriate for use with children – is broader than 'offence'.

Cinema had the lowest level of reported offensive adverts in the quantitative survey, partly because more people reported that they had not seen any adverts at the cinema. Several participants in the qualitative research felt that the approach of tailoring cinema adverts to the audience for each film works well.

**“I’ve always found in the cinema that the adverts are tailored toward the audience, I’ve never been in the cinema and felt ‘I can’t believe that’s on’.”**

Male, Edinburgh

The strength of offence caused by adverts also varies by medium. Offensive adverts on television, the internet and in magazines are the most likely to be described as very offensive by respondents.<sup>11</sup>



### 4.3 Types of offensive content

As the discussion progressed, participants’ concerns about offence in advertising focused on a number of specific themes. These included using sex to sell (particularly in a way that cheapens or commercialises sex inappropriately), body image, gender stereotyping, violence, misleading products, and hard-hitting charity adverts. Many of these worries seemed to include a mixture of being offended and feeling that this type of content was unsuitable, particularly for children<sup>12</sup>.

<sup>11</sup> On reflection, some respondents felt the most recent example of an ‘offensive’ advert they had come across was ‘not at all offensive’. This may be because they moved from thinking about whether they had been offended in general to consider specific examples of adverts they might have found offensive on a particular medium.

<sup>12</sup> Concerns around harm will be discussed in more detail in the next chapter.

These issues will be discussed in greater detail later in the report, with brief coverage of spontaneous perceptions below.

The use of **sexual imagery** to sell 'everything' was acknowledged as an issue by most participants, although not all found it offensive or mentioned it spontaneously. Many seemed to accept it as just part of life, and something they were so used to they tended not to notice.

**“Sex sells on billboards – sex sells everywhere.”**

Male, Edinburgh

Participants who said they found sexual imagery offensive felt it was disrespectful, usually to women, in a way that they strongly disliked. Offence was heightened when the advert looked cheap or when the product was perceived as unrelated to the sexual imagery or content used in the advert.

The portrayal of **body image** in advertising was a significant and spontaneous concern for many participants across the qualitative research, and typically more so than the current level of sex or nudity participants come across in advertising.

Concerns about body image in advertising were often linked to portrayal in the wider media. However, advertising was seen as playing a key role in exacerbating this issue because of its role in using these idealised images to sell products and brands.

Some women said they found the use of unrealistic and unobtainable body images in adverts offensive, in particular when they knew the images had been altered. Those who were concerned about the portrayal of body image perceived these images as misrepresenting how women look in a way that was insulting.

**"All the celebs are all like so skinny and thin and you feel like you have to like look a certain way just for society to accept you nowadays."**

Female, Edinburgh

The teenage girls who participated in the friendship groups also reported awareness that these issues were affecting their peers, even if they did not admit to being affected in this way themselves.

Adverts that utilise **gender stereotypes** were also mentioned spontaneously by some participants. While this was usually linked to the stereotypical or outdated portrayal of women in advertising, the use of negative male stereotypes was also mentioned by a few participants. Those who were offended by this type of advertising argued that the situation would not be acceptable if other types of people were stereotyped in a similar way.

**“You couldn’t say that about other communities and get away with it.”**

Male, London

Many participants felt that some **charity adverts** contained offensive content that went too far in seeking to make people feel uncomfortable or guilty, or used imagery that was considered too distressing despite being for a worthwhile cause. Adverts for international aid

charities, animal charities and child protection charities were frequently cited as being offensive, often because they use portrayals of violence or mistreatment in their advertising.

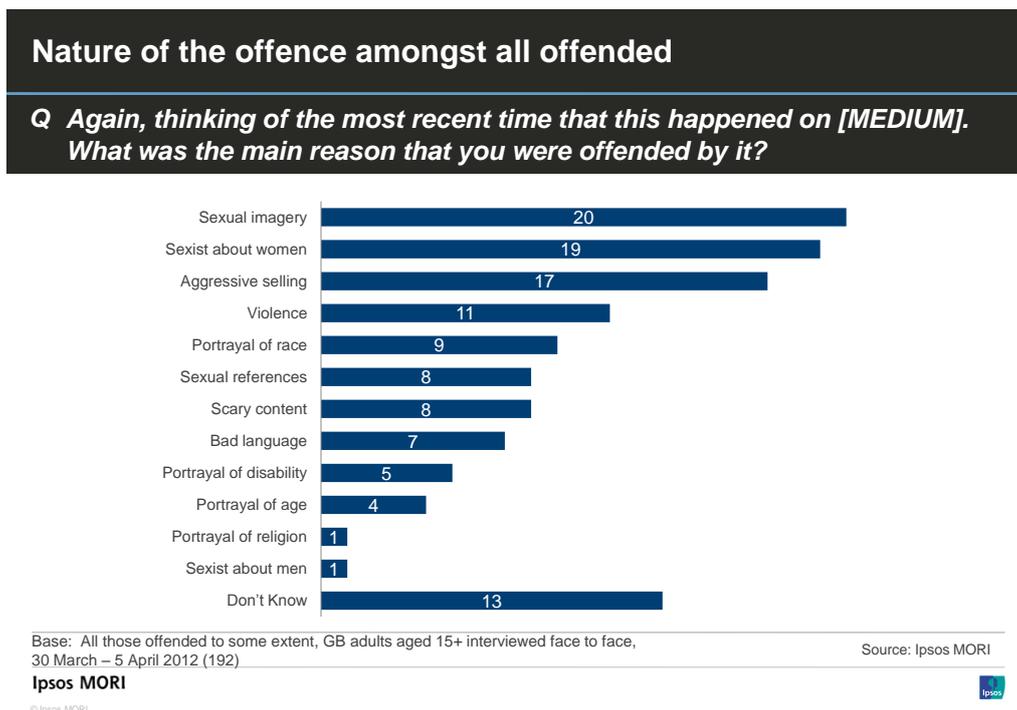
However, some participants seemed reluctant to admit that they found hard-hitting charity adverts offensive, and there was a sense that this type of approach is to some extent a necessary evil. In this case participants could at least understand why charities benefit from seeking to encourage an emotional response through their adverts. Indeed, a significant minority supported charities using strong imagery to highlight they cause more effectively.

**“Sometimes scary is good, because there is that shock factor.”**

Male, Conwy

Personal offence from **violence** in advertising was less common. The main examples participants discussed were adverts for violent films and computer games. In some cases participants had been offended by the adverts, but most were more worried about the impact on children (particularly boys) who would be attracted to the violent films and computer games being advertised.

In the general public survey 16% of adults said they had been personally offended by an advert in the last year. Of these, one in five (20% or 3% of all adults surveyed) were offended by the sexual imagery in an advert, and a similar proportion (19% of those offended or 3% overall) by sexism against women. The use of aggressive selling<sup>13</sup> in an advert was offensive for 17% of those offended (again 3% overall), while one in nine (11% or 2% overall) were offended by violence.



<sup>13</sup> The phrase ‘aggressive selling’ was not defined in the quantitative survey. However, participants in the qualitative research discussed ‘aggressive selling’ in terms of repetitive adverts or those that use techniques considered manipulative. This is discussed in more detail in chapter 5.

## 5. Harm in advertising

### 5.1 Spontaneous views of harm in advertising

Participants were less familiar with using the term harm when discussing advertising (and other types of media content). However, they did grasp the concept, even if they would use different language to describe their concerns about these issues. Participants were more likely to talk about adverts that were inappropriate, unsuitable or misleading.

In fact, when prompted, participants recognised that many of their spontaneous concerns about advertising were actually about harm rather than offence

**“It’s offensive if it’s personal – harm is more about other people.”**

Male, York

Spontaneous views of harm in advertising were often closely linked with potential harm from the product which was being advertised. Participants found it more difficult to understand the idea of harm from the content of adverts themselves – their top of mind examples of harmful advertising were almost always advertising that promoted products they considered harmful. However, as the discussion progressed they were able to identify some examples of harm resulting from adverts rather than products.

**“An advert for alcohol might trigger someone to think oh, I’m really trying to give up but I want a drink now I’ve seen one.”**

**“Or someone on a diet to think about having chocolate.”**

Participants, Conwy

Hardly any participants considered themselves susceptible to harm as a result of advertising. They had experienced (or could imagine) finding adverts distasteful, frustrating or offensive, but could not envisage being harmed by them. A few said that adverts for some types of products such as gambling or alcohol might have a negative impact on them, but these participants were unusual in their willingness to admit the potential influence of advertising on their behaviour.

Concerns about harm in advertising therefore tended to be on behalf of other people, and pinpointed two groups in particular:

- **Vulnerable people:** this was defined broadly, and included those who might be more easily misled by advertising, for example because of their education, cultural background, age or personal circumstances.
- **Children:** the need to protect children from harmful advertising was a concern shared by both parents and non-parents, even if it was a more immediate issue for parents.

There was also some discussion about harm to society generally from advertising. This was not usually linked to specific adverts, but rather the role some types of advertising play in influencing wider culture. For example, gender stereotyping, glamorising violence, the portrayal of body image and concerns about increasing materialism fall into this category. While individual adverts were not generally perceived as problematic, advertising overall was seen as playing a part in exacerbating issues that worried some participants.

**“Advertising has a big influence in society I think.”**

Male, Christian Group, London

## 5.2 Types of harm in advertising

Harm to children from advertising was the main concern for participants. This is discussed in detail in chapter 7.

The other types of harm mentioned by participants can be divided into two main categories: harm to individuals caused by specific adverts and harm to wider society caused by advertising more generally.

### Harm to vulnerable individuals

Adverts were considered harmful if they were perceived to **target vulnerable groups** in a way participants thought was inappropriate. Participants' main concerns were about advertising products they thought could be harmful, such as short term loans, online gambling, alcohol and HFSS food.

**“It’s very, very sad that people are that vulnerable and so it’s the vulnerable people that always get caught.”**

Male, Lisburn

**“These debt adverts are so dangerous and can cause harm.”**

Female, Edinburgh

This targeting was seen to take several different forms, including using particular types of media (daytime television, magazines) and excessive repetition. Participants also mentioned techniques they considered manipulative, such as free trial offers to encourage people to begin using products, celebrity endorsements, and the general tone of advertising making these products seem more glamorous than they are.

**“My elderly aunt buys The People’s Friend, and the inserts advertise more expensive products and target the gullible.”**

Female, York

Concerns about these products and the advertising used to promote them were some of the strongest raised spontaneously by participants during the research.

## Harm to society

Many participants attributed a role to advertising in exacerbating or reinforcing potentially harmful content available elsewhere in the media in a way that they felt had a negative impact on society. These concerns were usually linked to advertising generally rather than individual adverts.

However, advertising was not seen as the sole or most serious cause of harm in these areas, with the wider media, celebrity culture, peer pressure and other influences usually considered more to blame. Rather, advertising was identified by participants as an important contributory factor because of its role in legitimising or promoting behaviours that were felt to be unacceptable, inappropriate or unattainable.

For example, there were widespread concerns about the increasing commercialisation and sexualisation of society, and the role of advertising in promoting these trends. Some participants also worried that advertising could glamorise violence and other dangerous behaviour, while others discussed the potential impact of advertising that uses stereotypes on public views of minority groups.

The main areas of concern are detailed below.

**Commercialisation** was an area of harm linked to the role of advertising very generally. A minority felt advertising was one of the main drivers of materialism, while most thought the increasing amount of advertising was a result of our consumer culture. As discussed earlier in this chapter, some participants referred to specific adverts which they felt contributed to commercialisation by targeting vulnerable people or children who would be unable to see through the techniques used by advertisers.

For **sexualisation**, harm and offence were often closely interlinked in participants' minds. The main objection was to the unnecessary use of sex to sell products which themselves had no link to sex. A few also said that overly sexual adverts have a negative impact on society, although they often discussed this in terms of offence.

**“It’s the sexualisation that offends me most – do you really have to take all your clothes off to sell perfume? Is there any need?”**

Female, London

**“As a woman these ads make you feel uncomfortable and embarrassed, like you’re not good enough – and that is offensive”**

Female, London

Many participants spontaneously said that they felt adverts had contributed to the rising cases of young girls with low self-esteem and eating disorders by promoting an unrealistic ‘ideal’ **body image**. Wider media portrayal of body image was also seen as a problem, but adverts were seen as playing an important role because they use these images to sell products. This includes the way models are used in advertising generally, as well as adverts for specific products or services such as weight loss programmes.

**“Young girls nowadays are obsessed by body image... and that comes from advertising.”**

Male, Christian Group, London

**“When was the last time you saw any model with any blemish at all?”**

Male, Edinburgh

A few participants in the groups expressed concerns about adverts which **glamorise violent or dangerous behaviour**, for example adverts for violent films and computer games. Another concern was adverts that show young men behaving irresponsibly, for example in alcohol advertising.

Advertising that used **stereotypes** was seen as a potential problem, and although the portrayal of minority groups was a concern in the wider media, participants found it difficult to think of many recent examples of adverts that did this in a way they thought was harmful.

**“You used to see discrimination 20 or 30 years ago in advertising. They’ve cleaned their act up a lot.”**

Male, Conwy

The main exception to this was the use of gender stereotypes, and these are discussed in more detail in chapter 8. British Asian participants also identified some examples of adverts they felt stereotyped their communities, for example a Patak's advert which shows a British Asian man growing up in the UK. The voiceover of the character maintains a very strong accent throughout the advert despite living in the UK since childhood.

**“You know when you get adverts that portray British Asians with an accent that really bugs me, because not every British Asian has an accent.”**

Female, Muslim Group, Leicester

## 6. The role of context and tone in harm and offence

### 6.1 Placement and timing

The accessibility of advertising – in terms of placement and timing – was seen as the crucial issue by participants when considering both harm and offence. Ensuring adverts are shown in an appropriate context was seen as an important way of protecting children from harm. Appropriate context also reduced concerns about offence by reassuring participants that advertising would not be a source of the unexpected content many did not want to come across.

Where and when adverts appeared – and who could access them – was seen as much more important than the specific medium they appeared on. For example, potentially violent or upsetting adverts or trailers shown in a cinema were generally not considered harmful or offensive because they are appropriate for the audience. However, the same adverts shown on television without scheduling restrictions would be a cause for concern.

Three different types of placement and timing were discussed:

- **Adverts that anyone (including children) will come into contact with:** for example on posters or other outdoor adverts in towns and cities, pre-watershed television adverts, or radio advertising.
- **Adverts that children might see, but parents can manage their contact with:** for example adverts in special interest magazines, post watershed television adverts, or most online adverts.
- **Adverts that children probably will not see:** for example adverts in adult only environments, such as in pubs or nightclubs, when watching age restricted films at the cinema, or on websites requiring proof of age.

Most participants did not feel it was necessary to ban adverts outright unless they thought they were harmful or very offensive, and few of the examples participants had come across or considered during the discussions fell into this category. This is despite the fact that all the adverts used to stimulate discussion were subject to complaints from the public to the ASA.

Banning adverts was only really viewed as necessary if participants thought the content should not be shown on the mainstream media at all. Instead, the key priority for participants was to ensure that the placement and timing of adverts is appropriate for the content of the advert and the target market for the product being advertised.

**“There was an advert for glasses – for ‘Specsavers’ that showed women who were naked. That should not have been shown in the daytime.”**

**Female, Muslim Group, Leicester**

The biggest concern for participants was unexpected content in advertising available on media which is accessible to everyone. In these cases, children might see adverts when on

their own, with friends, or with their parents. Participants were worried about advertising that might upset or confuse them, and could necessitate a difficult conversation with parents.

While many argued that the watershed is still important as a way of safeguarding children, some felt it was less relevant than it has been in the past. They pointed out that many children can access TV in a variety of ways different times of the day, and it is much harder for parents to be able to monitor what children are watching.

**“The concept of watershed is ... not quite what it used to be. I mean when I was a child at 9pm you were in bed. These days they’ve all got TVs in their bedrooms and all the rest of it.”**

Male, Conwy

Participants also debated how much responsibility parents should have in protecting their children from potentially harmful adverts which fall into the middle category of those which children might come across. This is discussed further in chapter 7.

## 6.2 Tone

The tone of an advert helped negate potential offence, but only to some extent and in certain circumstances. Participants agreed that when an advert is light-hearted or humorous, this can reduce some types of offence, including portrayal of stereotypes and violence. Tone was considered less important when deciding whether an advert is harmful.

**“The advert was distasteful but it was really funny at the same time.”**

Female, Edinburgh

This does not mean, however, that adverts using humour or fantasy are free to include offensive material without restriction. The influence of tone was complex and participants did not identify any clear rules on how much difference tone made to whether something was acceptable or not.

The impact of tone seemed to be dependent on how strongly participants felt about the particular type of offence or harm. For example, many objected to the ‘Paddy Power’ advert which shows a cat being kicked into a tree. Despite the advert adopting a less serious tone, many participants felt that there is no place for humour when it comes to animal cruelty.

By contrast, the ‘Aero bubbles’ advert that was tested in the group was generally seen as inoffensive, despite some concerns about objectification of the male narrator who was semi-clothed. Many participants laughed at the line spoken by the woman - “Has he been speaking?” and it was generally viewed more positively because of its light-hearted approach.

**“Yeah the humour makes it better. I don’t think my kids would think anything of the fact he’s in his Y-fronts.”**

Female, Lisburn



#### Aero Bubbles television advert

This advert uses a semi-clothed actor to discuss the benefits of bubbles in chocolate.

Another example was the 'Pot Noodle' advert featuring Welsh miners. Participants generally agreed that the advert should not be taken at face value because of the humorous tone. Key too, was that the tone of the advert was in keeping with the product; a sense of humour that would, like the product, appeal to students and young people. As a result, most participants did not find the advert offensive.

**“Personally I don’t find it offensive, even if they were English miners, you buy into the premise or don’t, it’s not offensive.”**

Female, York

However, a few Welsh participants disagreed as they felt the advert made light of a very serious situation that had impacted negatively on many Welsh communities. This emphasises how tone will not reduce offence if someone feels strongly about an issue.



#### Pot Noodle television advert

The advert depicts Welsh miners 'mining' for noodles whilst discussing their pride at working in the industry. It includes music from a Welsh male voice choir and traditional Welsh names.

It is also worth noting that the general look and feel of an advert made a difference to perceptions of harm and offence. Adverts that looked professional or artistic were generally allowed more latitude than those that were considered cheap or poor quality. However, this too was not straightforward. For example, high quality adverts made some types of content more shocking (such as violence), while some poor quality adverts were taken less seriously by participants, in turn making them less offensive.

### 6.3 The importance of the product being advertised

As mentioned previously, participants often struggled to distinguish between their views of the product being advertised and the content of the advert itself. Many found it hard to look objectively at adverts for organisations or products that they disliked, or thought were harmful.

**“The ‘wonga.com’ advert is disgraceful – it shows puppets taking payday loans, makes it look like a great thing to do, and then they quote the representative APR which is like 4000%. I’m offended by it as these companies are like vultures, preying on vulnerable people.”**

**“I agree – also cash 4 gold adverts, they are exploitative, I’ve got an 18 year old son and I don’t want him to be tempted into taking a loan to get quick money, but it’ll hurt him in the long run. – i.e. the product is bad, not the advert per se.”**

Participants, London

When an advert was for a charity, or a public service message, there was more leeway for potentially harmful or offensive content, but there was still a point that these adverts were considered as going too far. For example, the NHS stop smoking adverts featuring images of smokers being hooked divided opinion. Some felt these were offensive due to the shocking nature of the images used, while others welcomed the striking content as necessary given the objectives of the advert.

Participants were also annoyed when an advert used potentially offensive content that was completely unconnected with the product being advertised. Generally, this centred on the use of sex and nudity to sell products that were nothing to do with sex.

**“Appropriateness [is important] – is there any need for revealing clothes, for example scantily dressed women advertising Ryanair? The scanty dress is not relevant”**

Female, London

By contrast, many felt that the use of nudity in perfume adverts was acceptable due to the product’s link with sensuality. And in some cases it was even more obvious that sexual content was relevant to the product in question. For example, despite some concerns with the provocative poses, most found the Calvin Klein and M&S underwear adverts tested during the discussions acceptable.



### Calvin Klein and M&S bus adverts

These adverts were shown on buses and depict models in different poses wearing underwear.

However, the Antonio Federici 'Submit to Temptation' advert featuring a priest and a nun was felt to be offensive and unnecessary by many participants – both for its provocative use of religious imagery and for its sexually suggestive tone, neither of which were felt to be relevant to ice cream.



### Antonio Federici poster adverts

These adverts show priests and nuns in a sexual context and use religious language to connect the imagery to ice cream.

## 7. Potential harm to children through advertising

### 7.1 General public and parental views

All participants, including those without children in their household, were conscious of the potentially damaging effect that the media – including advertising – can have on children. Views were consistent across parents and non parents, with both concerned about harm to children.

This consistency is also reflected in the findings of the quantitative survey, where very few significant differences were found between the views of parents and non-parents on offence and harm. Most people have some contact with children through friends or relatives and shared parents' worries about the influence of the media – including advertising – on children.

**“I think there’s a danger of children growing up a bit too fast, before their time, from music videos and adverts.”**

Female, London

The main difference for parents was the immediacy of these concerns in their everyday lives. Many parents could point to specific, recent examples of adverts that they felt were inappropriate for their children, either because the content was something they were not mature enough to engage with, or because they worried about their children being influenced by consumerism.

Participants tended to discuss whether adverts were inappropriate rather than harmful. They had concerns about the harmful nature of specific adverts, but also discussed harm to children through advertising more generally.

**Charity adverts** that use strong imagery to depict suffering or mistreatment were a spontaneous concern for many parents. They felt these adverts contained material that adults found hard to watch, and that they could be confusing and upsetting for children. Many parents gave examples of their children being upset by these types of adverts. There were specific concerns about charity adverts that appear on children’s channels. These were perceived as intended to engage children’s emotions so they would ask their parents to donate money.

One of the main issues identified by participants was **body image**. The key concern was the portrayal of idealised body images, as these were thought to influence the self-image of children negatively, particularly young girls. For some, the fact that these images are often altered further exacerbated the problem, creating an impossible standard for children to live up to.

**“It presents a distorted body image – it disturbs our idea of what women should look like.”**

Female, London

**Sexual content and nudity** was seen as inappropriate by some, but was felt to be less important than body image overall. Participants pointed to the amount of nudity across the media already, and said that advertising was not the main culprit in this regard. Nudity was less of a concern when it was in a non-sexual context (for example, shower gel adverts).

However, participants were worried about the premature sexualisation of children. When adverts showed a couple, or an individual, in a sexually suggestive or provocative pose, then this was generally felt to be unsuitable for younger children. This was seen as especially inappropriate for younger children who have not completed their sex education in school, as it may cause them some confusion, and lead to conversations with parents before parents want to discuss these issues.

Another key issue was around the **commercialisation of children**. This was a general worry about how children are exposed to advertising generally, as well as adults having specific concerns about advertising targeted at children. Parents particularly disliked adverts that they perceived as encouraging a strong desire in their children for a particular product. Parents felt the intention was to make them feel guilty and their children disappointed if they did not get what they wanted. A few also pointed out that advertising makes children's products look more exciting than they actually are when children get them home.

**“When they get the toy home and it doesn't work as it does in the advert.”**

Female, Edinburgh

Unease about adverts encouraging **violent or dangerous behaviour** was also a concern regarding the potential impact they might have on children. Some participants shared anecdotes of siblings or children copying violent or aggressive behaviours they had seen on promotional trailers for wrestling programmes, computer games or violent films. A few parents said they felt these types of adverts had affected their children's sleeping patterns. In many cases the main concerns were reserved for violent games or films themselves, with adverts seen as a way of making these products more attractive or intriguing to children.

## 7.2 Adverts that bother children

### Findings from the qualitative research

Children that took part in the qualitative research were asked about adverts that upset or bothered them in some way. Children were, like adult participants, often reluctant to admit that advertising had an effect on them at all, whether positive or negative.

However, some were able to identify adverts which had bothered them personally or that they felt might bother other children (and in some cases this will have been a proxy for their own feelings).

There were some overlaps in their concerns with those of adults, with mentions of the following main types of advertising that bothered at least some:

- Charity and public service adverts
- Violent or scary adverts
- Adverts with sexual content
- Body image

A majority of children spontaneously mentioned **charity adverts** as ones which had upset or bothered them or younger siblings recently. This encompassed adverts from a wide range of charities including children's charities, cancer charities, international aid organisations, and animal welfare charities. Some felt upset by the adverts themselves, while others were worried because they wanted to help the cause but felt they had no way of doing so.

**“We can't sponsor. We can't give money to them, they're asking for us to give, but we're too young.”**

Girl, Friendship Group, Belfast

**“The dogs are cute; you can't help but want one.”**

Girl, Friendship Group, Falkirk

Similarly, some children pointed to examples of **public service adverts** they had found difficult to watch or upsetting. The most common example was road safety advertising, including campaigns targeted at young people. Some boys also identified the government's current anti-rape campaign as something which had bothered them and made them feel uncomfortable. There was a sense that, while they had understood the broad intention of the advert, they were not completely clear on its purpose and were likely to ask peers for clarification.

**Violent or scary adverts** – mostly film trailers and game adverts – were mentioned as an issue in a few cases. Girls were more likely to say they had been bothered by these than boys, though when prompted some boys did note they thought it could have an impact on the behaviour of their peers. Those children who were bothered generally said they only came across these adverts on late night television and would simply switch off or over. Most said they were worried about their younger siblings seeing violent or scary adverts rather than admitting being bothered by this type of thing themselves.

**“Horror film adverts are usually on late at night or on E4 – where you would expect to see them.”**

Girl, Friendship Group, Brighton

Adverts with **sexual content and nudity** were often seen as either funny (by younger children) or inappropriate for younger children (by older children). Those who said they were bothered by these adverts tended to be embarrassed rather than confused or upset. However, some younger children admitted that they did not always understand what was going on in these adverts. This either made them want to find out more about what they had seen, or alternatively caused them to lose interest and disengage.

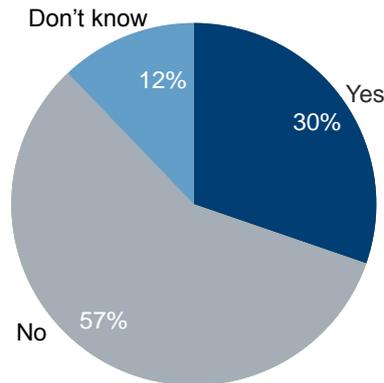
Teenage girls were reluctant to admit the impact of adverts showing idealised **body images** on them personally. Instead they tended to talk in more general terms about advertising putting pressure on other people to look a certain way. However this clearly was a concern for at least some of them and many had discussed these issues in school or with friends. Portrayal of body image was much less of a worry for boys, although some could see how it might have an impact on girls and women.

## Findings from the quantitative research

As discussed in chapter 4, the quantitative research found that a significant minority of young people had been bothered by an advert recently. Three in ten 11-16 year olds (30%) said they had seen such an advert in the last year. Around six in ten (57%) had not seen anything that had bothered them in the same period.

### Harm and offence in advertising - children

**Q** *Have you come across any adverts in any of these places that have bothered you in any way in the last 12 months?*



Base: 1,020 UK children aged 11-16, interviewed online, 5 – 17 April 2012

Source: Ipsos MORI

Ipsos MORI

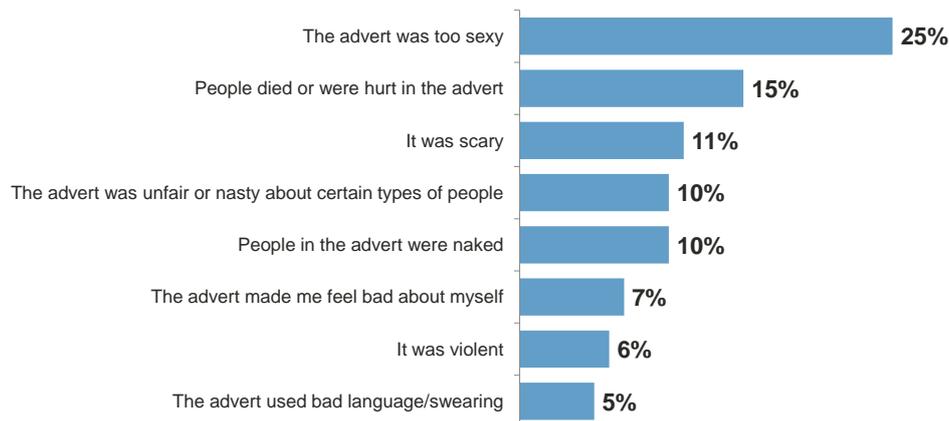
© Ipsos MORI



Of the 30% of young people who had been bothered, around a third of these (35% or 11% of young people overall) reported that either sexual content (25% or 8% overall) or nudity (10% or 3% overall) was the reason that they were last bothered by an advert. Violence and scary content also accounted for around a third of those who were bothered (32% or 10% overall).

### Reason for being upset by an advert

**Q** Thinking about the last time you came across something like this in an advert, what was the main reason that you were bothered by it?



Base : All children who have come across an advert that has upset them in the last 12 months, interviewed online, 5 – 17 April 2012 (308)

Source: Ipsos MORI

Ipsos MORI

© Ipsos MORI



This data suggests that body image is less of a concern when it comes to individual adverts. Only a small minority (7% of those bothered, equivalent to 2% overall) of 11-16 year olds reported being bothered by an advert because it made them feel bad about themselves. Instead, the qualitative findings imply that this is a more general issue with advertising and indeed the media as a whole.

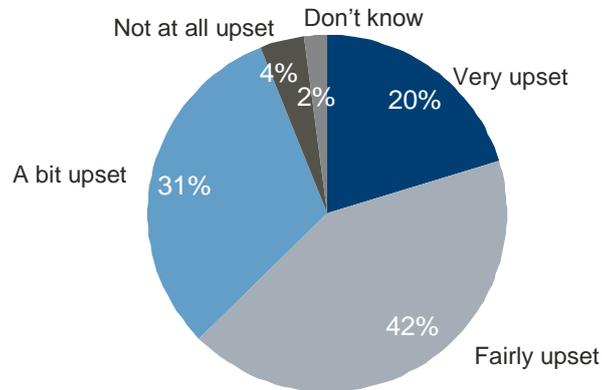
The most common place for 11-16 year olds to have come across an advert they found upsetting was television. Just under a quarter of young people (23%) overall had seen an advert which bothered them on television, 12% had come into contact with one on the internet, while smaller numbers had seen one in a magazine, newspaper, or on posters (8%, 8% and 7% respectively).

Among the 12% of young people who had been bothered by an online advert, the majority were encountered by respondents when simply browsing the internet (59% of these respondents) or on a social networking site (55%), followed by on the website for a television programme or channel (46%).

The degree to which being bothered by an advert upset young people varied considerably. One in five of the 30% who had been bothered (or 6% of young people overall) reported that they had been very upset, and a further two in five (42%) of these respondents said they were fairly upset (equivalent to 13% overall).

## Extent of upset among those bothered by an advert

**Q** Thinking about the last time you were bothered by something like this, how upset, if at all, did you feel about it?



Base: All children who have come across an advert that has upset them in the last 12 months, interviewed online, 5–17 April 2012 (308)

Source: Ipsos MORI

ipsos MORI

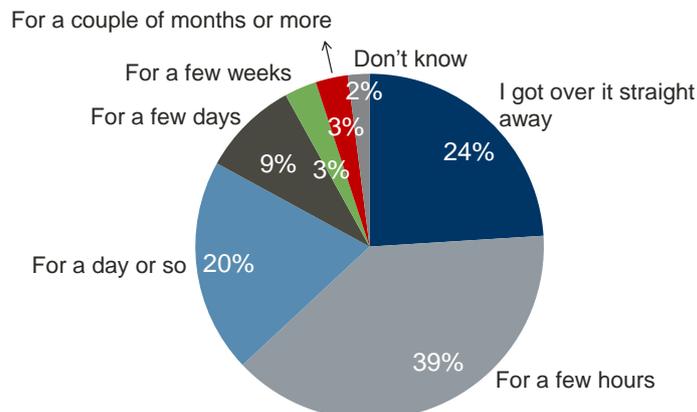
© Ipsos MORI



For the majority their upset was not long lasting, with almost two thirds (63%) of the 30% who were bothered reporting that they were over it within a few hours. However, a minority of those bothered (17% or 5% of young people overall) were upset by their encounter with the advert for over a day, and for a very small minority, up to a couple of months.<sup>14</sup>

## Length of time being upset

**Q** And how long did you feel like that for?



Base: All children who were upset by an advert to some extent, interviewed online, 5–17 April 2012 (288)

Source: Ipsos MORI

ipsos MORI

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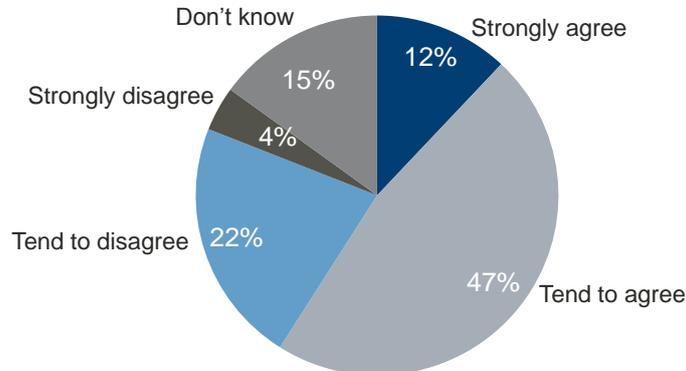


By contrast, three in five (59%) young people overall agree that some people are too sensitive about the things that they see in advertising, rising to seven in ten (69%) boys aged 14-16.

<sup>14</sup> Please note that these percentages are not based on all young people aged 11-16 but only those bothered by an advert.

## Views on the sensitivity of others

**Q To what extent, if at all, do you agree or disagree that some people are too sensitive about the things they see in adverts?**



Base: 1,020 UK children aged 11-16, interviewed online, 5 – 17 April 2012

Source: Ipsos MORI

Ipsos MORI

© Ipsos MORI

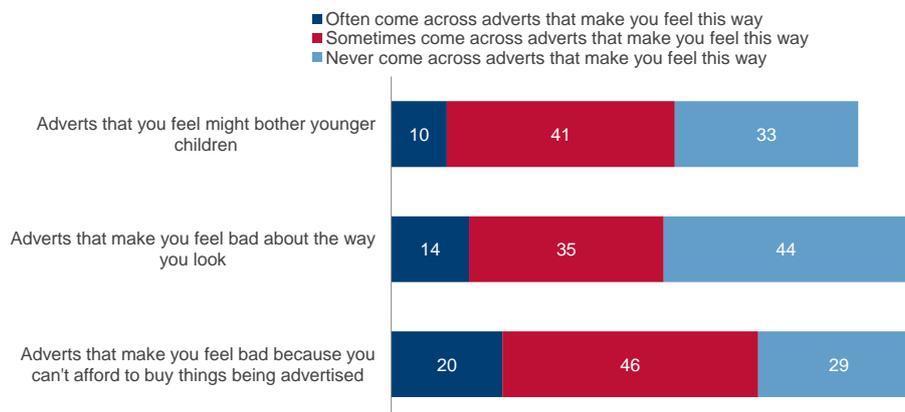


More young people said advertising generally had a negative impact on them than could remember being bothered by a specific advert. As with adults, children see the expectations created by advertising as an issue, with two thirds of young people overall (66%) reporting that they sometimes or often come across adverts that make them feel bad because they are unable to afford things.

Around half of young people (49%) also said they come across adverts that make them feel bad about the way they look, rising to 56% of girls aged 14-16. This contrasts with just 2% who spontaneously said they were bothered by a specific advert because it made them feel bad about themselves for any reason.

## Different types of harm

**Q Please tell us whether or not you come across adverts that make you feel the following things. . .**



Base: 1,020 UK children aged 11-16, interviewed online, 5 – 17 April 2012

Source: Ipsos MORI

Ipsos MORI

© Ipsos MORI



### 7.3 Protecting children of different ages

In the qualitative work with adults most participants argued that children of different ages need to be protected in different ways from potentially harmful advertising. Children develop at different ages, and have a range of susceptibility to harm from different types of content. Participants' view was that harm is determined both by the age of the child and by the level of understanding that they have about a specific issue. When children do not understand adverts some will simply ignore them, while others will be intrigued and want to find out more from their parents, siblings or friends.

Despite recognising that children need to be protected in different ways many participants struggled with the idea of a system of regulation that was flexible enough to allow for this variation.

Some felt that a cut off point was appropriate, with those under a certain age protected in specific ways. Others were unconvinced, pointing out that children were never really 'safe' at any age and need different types of protection at different ages. Some adults and young people themselves felt that a crucial age is 12 or 13 – the age at which children go to secondary school – but not all agreed.

**“Adverts should not really be aimed at children under the age of eight.”**

Male, Edinburgh

**“When they're about 8 or 9 sexual content is just inappropriate, it can really embarrass them. Older than that it's OK.”**

Male, London

**“I think eleven and under should be classified as children and then eleven to sixteen are young people.”**

Female, Edinburgh

There were also different concerns about boys and girls. For example, boys were considered more likely to imitate violence if it is glamorised whereas girls might need more protection from being upset by these adverts.

Participants emphasised that the need for protection does not simply decrease with age. In particular, teenagers need protection from different types of content than younger children. It was felt that younger, pre-pubescent children, do not sometimes fully appreciate what they are seeing, and may not be harmed in the same way as teenagers. Examples included the influence of violent adverts on the behaviour of teenage boys and the impact of adverts showing unrealistic body image on the way teenage girls see themselves.

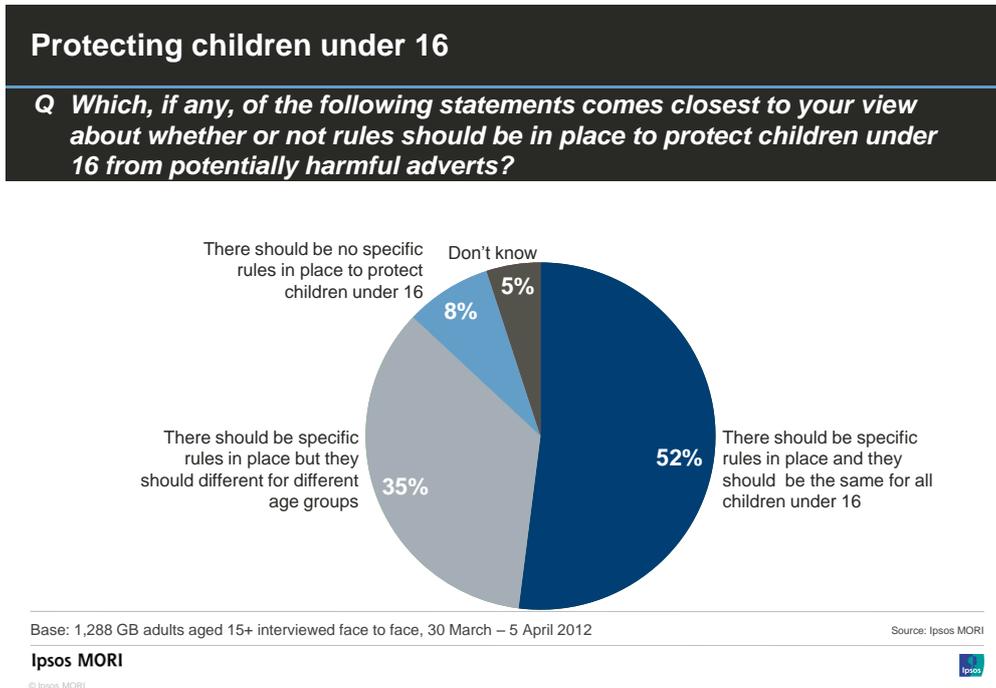
As children get older they were perceived as being more susceptible to influence from issues such as stereotyping and sexual imagery or references. Participants felt that publicly visible advertising needed to take this into account. By contrast, younger children may need more protection from that which is overtly scary or violent, but less so against innuendo or references to adult discussions, much of which will go over their heads.

In terms of the rules that need to be in place, the majority view amongst the general public was that there should be specific rules in place and they should be the same for all children under 16 (52%, rising to 58% of those aged over 55). However, the findings from the

qualitative research suggest this may be because people had difficulty in envisaging a system that allowed different types of protection to be in place at different ages.

A significant minority of around a third (35%) feel that the rules should be different for different age groups, leaving 8% who believe there should be no specific rules at all, and 5% unable to say.

Findings among parents on the types of rules that should be in place are in line with those for the general public overall.



## 7.4 The role of parents

Participants were divided on the level of responsibility that a parent needs to have in ensuring that their child is not exposed to harmful advertising. There was broad agreement that this responsibility should be split between a parent and a regulator, and a general consensus that the regulator should act as the decision-making authority and a deterrent to advertisers who might want to push the boundaries too far.

The main debate was therefore over the balance of responsibility between parents and regulation. Participants' relatively low understanding of how the ASA worked meant that they knew little about the decisions it makes, and the extent to which children are already protected against harmful or offensive advertising.

At one extreme, a minority argued that they would be happy to explain anything to their children. Despite the fact that such conversations may be uncomfortable for parents, many see them as a necessary part of their child's development. To clarify, however, parents did not generally want to be forced into such conversations at unexpected times. They felt these discussions should happen when parents want them to, rather than in response to advertising or other types of media.

**“I feel they [advertise] pressure me into discussing things with my boys I am not ready to discuss.”**

Female, Edinburgh

However, most participants assumed that some parents would not take seriously their responsibility for monitoring their children’s media and advertising consumption. This means children may come into contact with advertising that participants felt they should not be exposed to. Therefore, these participants argued for a continued, or even a greater role for regulation in protecting children from harmful advertising content.

As the media landscape changes, participants also felt it was becoming increasingly hard for parents to continue to monitor that their children are not consuming inappropriate content. While some parents felt confident to use technology to monitor their children’s media consumption this was not the case across the board. Keeping track of media usage is particularly challenging for parents of children who play video games, spend a lot of time online, or are ‘early adopters’ of new technology.

**“I use ‘Screenrecorder’, a programme that allows me to see what they’re doing on their computer.”**

Male, London

**“My nephew’s 10 and he’s not allowed to watch Family Guy, so he gets it on his phone.”**

Male, Lisburn

There was general agreement that it is impossible to comprehensively protect children all the time from potential harm from media content including advertising. Most felt it was undesirable to do so as children get older, provided appropriate regulation is in place.

## 8. Specific types of harm and offence in advertising

As the findings clearly illustrate, participants did not always separate their concerns about the content and impact of advertising neatly into offence and harm. Instead they preferred to talk about specific adverts or types of advertising that concerned them in some way.

As discussed in chapter 3 many participants felt advertising was not the ‘worst offender’ on these issues, with other media being seen as including more offensive and harmful content. However, there were also concerns about harm and offence in advertising, particularly where advertising exacerbates or reinforces other negatively viewed content.

Many of the types of harm and offence outlined below have already been discussed earlier in the report. This chapter is designed to draw out the key themes, providing more detail about the way participants in the qualitative research characterised their concerns.

These key themes emerged in three ways:

- Participants discussed their own experiences of harm and offence in advertising, which generated ideas and debate within their groups.
- Moderators prompted participants to discuss specific types of potential harm and offence in advertising.
- Each group examined a number of different adverts which the ASA had received complaints about and considered whether they were offensive, harmful, or both.<sup>15</sup>

### 8.1 Sexual content and nudity

A few participants were offended by the levels of sexual content and nudity they come across in advertising. They felt it was unnecessary for advertising to rely on sex so much and considered it inappropriate in general, not just when considering the impact on children.

**“Most adverts seem to have a high sexual content and it seems to be the norm, basically if you want to make an advert to appeal to people it has to include sexual imagery.”**

**Male, Christian Group, London**

Offence was particularly strong where these participants could see no link between sex and the product being advertised. Tone was also important – poor quality adverts that were seen to cheapen sex tended to provoke stronger reactions, even if the level of sexual content or nudity was relatively low.

Many parents also said they felt “uncomfortable” when watching sexual content with their children, even if they were not offended by it themselves. In turn, children in the family groups also said they felt embarrassed if they came into contact with sexual content when with their parents. Again, this was a more general concern about the media in general, with adverts not seen to be the main problem in this regard.

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<sup>15</sup> Further details of these adverts are included in the appendices to this report.

**“You feel uncomfortable because, maybe you’ve got your children with you. You feel uncomfortable for them, not for yourself.”**

Male, Conwy

**“The one that annoys me is where the girl pulls her dress up in a lift – it won’t offend me but it’s in bad taste. But if I was sitting round with my children I’d find it offensive, it’s embarrassing to watch.”**

Female, London

However, many participants were not concerned about nudity or sexual content in advertising per se. They pointed out much worse examples in television programmes and on the internet, and argued that sex in advertising is relatively mild.

## 8.2 Body image

One of the most prominent spontaneous concerns was the portrayal of body image in the media generally, including in advertising. In particular, participants discussed the potential for harm resulting from people coming across so many idealised and altered images of ‘perfect’ bodies.

These images were seen as creating a dangerous idea in the minds of teenage girls – and to lesser extent women in general – that they should aspire to a physique that was deemed as unhealthy and unobtainable. A few men mentioned the increasing pressure on them to conform to an idealised male body image, though this was seen as much less of an issue than it is for women.

**“This is part of celebrity culture – magazines attack celebrities for being too big, say that everyone needs to be slim – and my daughter’s being affected, she’s going through a phase of not eating.”**

Female, London

While body image was certainly seen as an issue in the media generally, it was considered an important concern specifically for advertising, as advertisers rely on associating these perfect images with their products. Despite this, only a minority when presented with specific examples of these adverts felt that they should be banned. Instead of being offensive or harmful individually, the adverts were seen as contributing to a broader culture where women in particular feel bad about themselves.

**“If you look like this, you’ll get all this... and there’s usually a yacht and champagne and everything else. And you never will look like that. So you’re always going to be a disappointment to yourself, which will cause psychological problems as you get older.”**

Male, Conwy

Further supporting this finding, the quantitative survey with 11-16 year olds shows that half (49%) say that they have often or sometimes come across adverts which have made them feel bad about the way that they look, rising to 56% of girls aged 14-16.

However, amongst children who were bothered by a specific advert in the last 12 months, only 7% reported that the main reason was because it made them feel bad about themselves (compared with 35% for whom the main reason was that it was 'too sexy' or contained nudity). This indicates that children agreed with adults: individual adverts which promote an unrealistic body image do not bother them greatly, rather that the harm is a result of the general context of advertising and other media which present this type of idealised image, a concern which is exacerbated because many of the images used are altered.

### 8.3 Gender portrayal and stereotyping

Another issue related to sexual content and body image was examples of men and women being portrayed stereotypically. This focused on adverts where men and women are shown as one-dimensional characters behaving in prescribed ways in an advert.

In terms of the portrayal of women, as discussed, there were concerns about unrealistic and sexualised female forms in advertising. This was felt to be particularly offensive amongst religious participants. In the older Muslim group, there was a general concern about how western culture uses sexualised images of women in order to sell products.

**“They put a half-naked woman there to sell the cars. It’s degrading to the femininity of women...objectification of women is part of western culture.”**

Male, Muslim, Leicester

There were also some concerns about how women are shown to behave in adverts. As an example, many disliked the idea that by using a particular product a man can have instantaneous success with the opposite sex, as this says more about the behaviour of women than about the product being advertised. The 'Rustlers' advert also fell into this category.



#### Rustlers television advert

The advert shows a man and woman returning home following a date. In the time it takes the man to microwave a burger his date has changed from wearing a coat to her underwear, despite looking nervous at the start of the advert.

Concerns about the portrayal of men were different. Where this was seen to be damaging, and perhaps offensive, was when socially unacceptable conduct by men was presented as the norm, such as 'laddish' or immature behaviour. Examples included recent campaigns by

'WKD'<sup>16</sup>, and the 'Rustlers' advert tested in the qualitative research. Indeed, some were concerned that too many adverts portray men, particularly in groups, in a less than favourable light, where it would be much less acceptable to portray women in this way.

**“There are quite a lot of adverts that make men out to be stupid – I find that offensive.”**

Male, Lisburn

In the general public survey, sexism about women was a much more common reason for being offended by an advert. Around one in five (19%) of those who had been offended cited sexism about women, compared with just 1% who cited sexism about men.

## 8.4 Adverts for sex shops and lap dancing clubs

Participants did not mention adverts for sex shops and lap dancing clubs spontaneously, but three examples of these were tested in the workshops, and the same adverts were also shown as part of the general public survey. Some could recall seeing these adverts themselves, often in public places, but many had not come across similar examples.

When looking at the adverts in the qualitative research, few saw the need to ban individual adverts outright. Instead, there was support for restricting the imagery and language that could be used, and for taking sensible precautions with placement so few children are likely to see them.

**“It would be a problem on the side of a day care facility but...I think it's where it's advertised. If that's on the tube or it's in Soho or... in a neighbourhood where there's sex clubs it would make perfect sense wouldn't it.”**

Male, Lisburn

Even those who were, in principle, wary of these shops and clubs being allowed to advertise in public did not always call for the individual adverts they were shown to be banned completely. This is not to say that such advertising was supported – it was more the case that participants were prepared to tolerate it if these conditions were met.

In fact, a minority felt the principle of these establishments being allowed to advertise was an important one to uphold. A few argued that it was actually important that they are allowed to be able to advertise, to prevent them going 'underground'.

In the general public survey there was much less willingness to accept these types of adverts, with people evenly split on whether they should be allowed in public or not. Just under half (46%) called for them to be banned completely, rising to 52% of women, and 55% of those in social grade DE. A similar proportion (48%) felt that they could be shown, either with restrictions (43%) or without (5%).

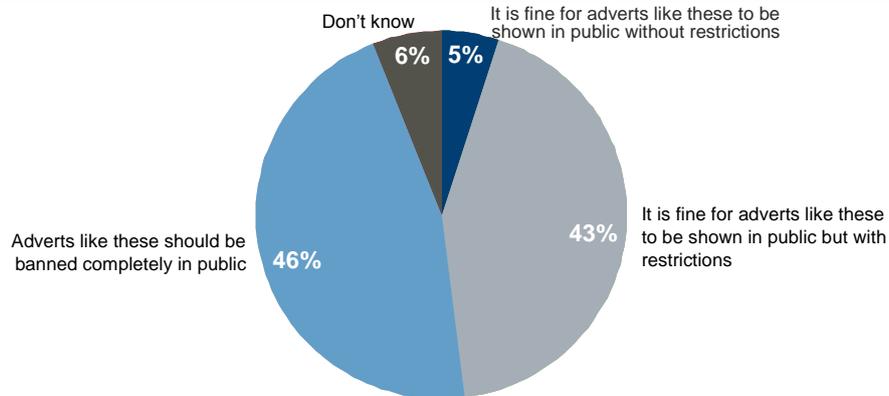
Willingness to accept publicly visible adverts for sex shop and lap dancing clubs varies significantly between those respondents who viewed example adverts as part of the survey and those who did not. Those who chose not to were much more likely to advocate banning these adverts completely, while those who had been willing to view the adverts were in turn more likely to believe they were acceptable with certain restrictions.

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<sup>16</sup> <http://www.brandrepublic.com/news/167043/>

## Publicly visible adverts for sex shops and lap dancing clubs

**Q** *In general, do you think it is acceptable for adverts for lap dancing clubs and sex shops to be shown on posters or billboards in public without restrictions, to be shown in public but with restrictions, or should they be banned completely?*



Base: 1,288 GB adults aged 15+ interviewed face to face, 30 March – 5 April 2012

Source - Ipsos MORI

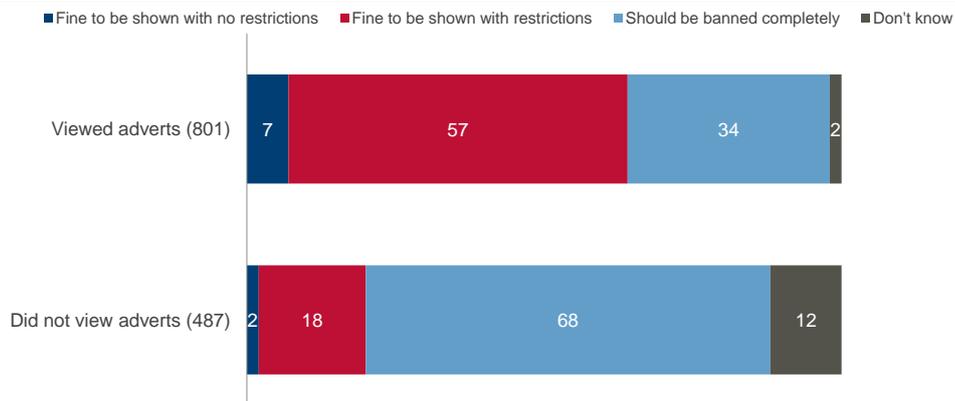
**Ipsos MORI**

© Ipsos MORI



## Publicly visible adverts for sex shops and lap dancing clubs

**Q** *In general, do you think it is acceptable for adverts for lap dancing clubs and sex shops to be shown on posters or billboards in public without restrictions, to be shown in public but with restrictions, or should they be banned completely?*



Base: 1,288 GB adults aged 15+ interviewed face to face, 30 March – 5 April 2012

Source: Ipsos MORI

**Ipsos MORI**

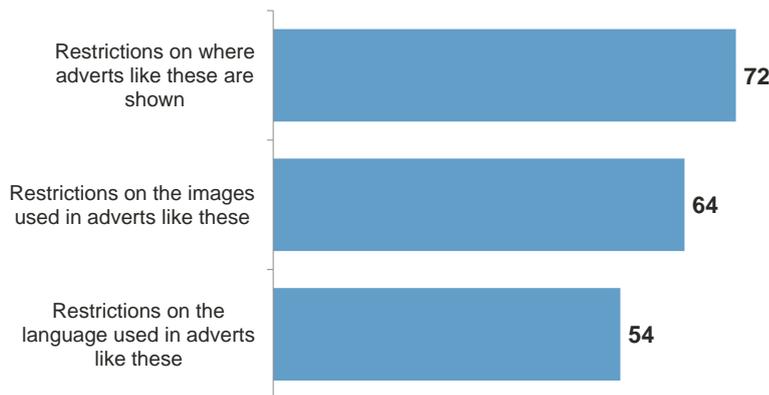
© Ipsos MORI



Among those who felt these adverts should be restricted, there was majority support for all the types of controls suggested. The most strongly supported restriction was on the placement of these adverts (72%) followed by the imagery used (64%) and the language (54%).

### Which restrictions are appropriate

**Q** In your view, if any, of the following restrictions are important to apply to adverts for lap dancing clubs and sex shops shown on posters or billboards in public?



Base : All who feel restrictions should apply, GB adults 15+, interviewed face to face, 30 March – 5 April 2012 (528)

Source: Ipsos MORI

Ipsos MORI

© Ipsos MORI



The qualitative research highlights some of the aspects of these adverts that made a difference to how acceptable participants felt they were.

Where there was less of an obvious reference to sex or nudity, and it was less immediately clear what was being advertised, then there was felt to be less need for restrictions to apply. The 'Urban Tiger' advert that was shown to participants drew comparisons with an advert for a hotel or typical nightclub, and was deemed by most to be acceptable irrespective of context, as it did not contain sexual imagery or language. Where an advert made an overt reference to 'sex' or contained a naked woman or a provocative pose, then participants were more inclined to agree that restrictions should apply to it.

**“It [SEXY Adult Store] is for everyone to see, there’s no restrictions. If it was in a magazine I wouldn’t mind as much because you can choose to read that or not, but not with a billboard.”**

Female, York

Another factor that was key to determining offence was how professional the advert looked. When an advert looked poorly produced, or as if the organisation had put it together without help from an advertising agency, then participants felt that it looked 'seedy' and cheapened the product that was being advertised. This was exemplified by the 'Sexy Adult Store' Billboard advert, and compounded by the fact that the shop that was being advertised was located in an industrial estate.

The three examples of sex shops and lap dancing clubs that were tested in the general public survey were seen as more harmful to children than personally offensive to adult respondents. 'Heaven' and 'Sexy Adult Store' were judged to be equally offensive and harmful, though the 'Urban Tiger' advert was felt to be less so.



Q Thinking about this advert, how offensive, if at all, would you say it is to you personally? Q Thinking about this advert, how harmful, if at all, would you say it is for children under 16?	Offensive to you			Harmful to under 16s		
	Heaven	Urban Tiger	Sexy Adult Store	Heaven	Urban Tiger	Sexy Adult Store
Base: All who agreed to look at example adverts; GB adults aged 15+ interviewed face to face, 30 March – 5 April 2012 (847)	%	%	%	%	%	%
Mean score out of 10 (where 0 is not at all offensive/harmful and 10 is very offensive/harmful)	3.3	2.4	3.3	6.4	5.0	6.5

Source: Ipsos MORI

Scores for harm and offence given by parents and non-parents were very similar for all these adverts. The only exception was 'Heaven', which parents considered slightly more harmful to children than non-parents (mean scores of 6.9 and 6.3 for harm respectively).

Respondents in London were the most likely to be personally offended by these adverts (mean scores of 5.1 for 'Heaven', 3.9 for 'Urban Tiger', and 4.5 for 'Sexy Adult Store'). However, Londoners' views on the whether these types of adverts should be shown in public were similar to those for the country as a whole.

## 8.5 Charity and public service adverts

Many participants spontaneously mentioned hard-hitting adverts for charities, or government funded adverts encouraging behaviour change (for example about drink driving), as examples of offensive or harmful adverts. These types of adverts were the most polarising of those discussed during the qualitative research.

Some felt that these adverts can go too far in their portrayal of violence, suffering, or hardship in an attempt to provoke a reaction. Those who expressed these concerns thought charity adverts in particular often made people feel guilty or uncomfortable in a way they considered inappropriate. Furthermore, the shocking content in more graphic charity and public service adverts was viewed as distressing and even offensive by some participants. These adverts were perceived as particularly problematic if they contained very strong imagery, were encountered unexpectedly, or if they were repeated excessively.

**“When there’s a suggestion of violence against children it makes *me* catch my breath.”**

Female, Conwy

By contrast, others were supportive of the need for charity and public service adverts to attract people’s attention in order to be effective, and therefore successfully convey their message. Participants who took this view felt that the worthwhile aims of these adverts meant they should be allowed more scope to trigger a strong emotional response from people.

Children were bothered by charity adverts in two ways. As with adults, some simply found the content of the adverts themselves distressing. However, children also gave examples of being engaged by adverts but feeling upset because they felt helpless to make a difference to the situation portrayed.

Indeed, many parents felt that some charity adverts (for example around animal welfare) were actually targeting their children. They thought advertisers understood children would be more likely to respond emotionally, and then put pressure on their parents to donate money or do something about the issue. Several parents said their children had asked to adopt pets from shelters after seeing these types of adverts. Similarly, parents gave examples of public service adverts being seen by children, and in some cases affecting them emotionally or leading to conversations that were not necessarily age-appropriate.

**“The DOE ones<sup>17</sup> are worse because there is so much in it, like people being killed, and like the music and the background they have with it.”**

Girl, Friendship Group, Belfast

**“Some parents would talk to their kids and put it in context and reinforce the positive message, but not all children have that support.”**

Male, Conwy

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<sup>17</sup> <http://www.youtube.com/watch?v=xtJqw--DGI8>

## 8.6 Violent or scary adverts

Few adults spontaneously mentioned examples of violent or scary adverts as being offensive to them personally, or even to other people. From the quantitative survey with adults, 11% of those who were offended by an advert said this was due to violence, while 8% cited scary content.

Again, as was the case with sexual content and nudity, many felt that the level of violence or peril in adverts was notably less than in films, or post-watershed programming, and computer games. As such, most do not associate adverts with this sort of content.

However, there were concerns about harm, especially to children. Examples of this sort of advert were given by children in the friendship groups, and there were certain adverts that were felt to be responsible for altering the behaviour of other children and teenagers, and sometimes affecting sleeping patterns.

**“Wee kids might take it as real if they’re not smart enough.”**

**Boy, Friendship Group, Belfast**

Generally, it tended to be trailers and adverts (in print and television) for films and video games that were cited by both children and adults as examples of this type of advertising, and they were often more scary when participants understood what the film was about – this was usually around horror films, such as the adverts for ‘Paranormal Activity’.



Sometimes an image could be suggestive of violence or horror without containing anything overtly graphic, such as the advert for the video game ‘Brink’, featuring a character wearing face paint (shown to children as part of the research), or the

poster advert for the film ‘The Devil Inside’ which was brought up spontaneously by participants (both adult and children). The effect was much the same, however, and many found the suggestion or threat of violence just as offensive as the portrayal of violence itself.

The suggestion of violence against women was seen as particularly offensive and harmful; an example was the ‘Kane and Lynch’ advert shown to adult participants which featured a woman tied up and gagged with two armed men standing behind her.



When adult participants mentioned violence or peril this tended to come from public service ‘warning’ adverts, perhaps around the danger of fireworks, road safety, rape or domestic violence. Many could remember such adverts from when they themselves were children.

**“Don’t go near areas of water like reservoirs. There was the black clawed figure at the end of it and he didn’t have a face.”**

**Male, Edinburgh**

Again, though the message behind the advert was felt to be important to convey, there was less appetite for it to be part of pre-watershed programming.

**“Domestic violence [adverts] are not offensive but they are shocking.”**

Male, Edinburgh

## 8.7 Commercialisation and misleading adverts

As well as concerns about society becoming increasingly commercialised through advertising in general (discussed in chapter 5), there were worries about specific adverts using misleading or aggressive techniques to promote products and services.

Misleading adverts – particularly those targeted at vulnerable groups – were strongly disliked by participants. This often led to these adverts being seen as harmful, as participants felt that people might be taken in by claims made for products, even when these were untrue. Misleading and aggressive advertising was described as being offensive by participants, even if they fall outside the usual definition of offence used by regulators.

Examples of these adverts were for health and beauty products, and were felt to be purposely misleading, and not to be taken at face value.

**“Got an ad today about losing 2 stone in two months, actually thought how do they get away with it.”**

Male, Conwy

**“It’s like false information where they say this face cream made me look 20 years younger, 80% of all women agree with this and in small print at the bottom it’s like been tested on 20 women who are 30 years old.”**

Female, Edinburgh

These concerns were similar to those for products that were seen as harmful, as discussed in more detail in chapter 5.

Similarly, misleading adverts where images have been digitally altered or claims are supported by what is perceived to be unreliable or ‘faux scientific’ evidence are another cause of offence in advertising, as participants defined it.

**“I ripped this [advert] out of Grazia magazine and they’ve got this wild claim that 90% of women felt their skin was soothed and hydrated in just one day which should have open bracket, b\*\*\*\*\*s, close brackets in my opinion... The sample group is 191 so we’re not talking, you know, clinical research here. We’re just talking b\*\*\*\*\*s. So I hate these claims.”**

Male, Edinburgh

**“Patronising ads, like the makeup ads that are filmed with inserts or extensions. It’s mis-advertising.”**

Female, York

Amongst those in the general public survey offended by a television advert, one of the top reasons was due to aggressive selling (15%). Some felt that the naivety of children was often exploited in adverts, to the extent that they believed an unrealistic or idealised situation or product, and, potentially, a harm caused by these distorted expectations.

**“At Christmas time the adverts create a want in children that is so great due to advertising saturation.”**

Female, Edinburgh

## 8.8 Less prominent concerns

There were general concerns about the media portrayal of specific groups within society, for example different ethnic or religious groups, as well as LGBT, older, or disabled people.

Generally these concerns were around their portrayal in fictional drama, both in television shows and films, and to some extent in video games. However, participants did not tend to come into contact with many adverts that were perceived to be offensive or unfair to minority groups, and it was generally felt that advertisers steer well clear of this area for fear of linking offence to their product or brand. This was seen as an area where advertising had changed over recent years to come into line with changing societal attitudes.

A few participants mentioned adverts which used national stereotypes that had the potential to be offensive. Though this was often considered light hearted, in a few cases this was perceived to go too far therefore became unacceptable. If it was not felt to be personally offensive, then it was possible that others may be offended.

**“That Irn-Bru advert ... that was more offensive about Scottish, ‘cause it was a guy was really broad, Glaswegian and he sounded violent or something so people complained.”**

Male, Edinburgh

The younger Muslim group were concerned with the negative or stereotypical portrayals of Asian British people, and they were worried about how this would impact on race relations, and how they are seen by White British people. They were concerned about this portrayal in the wider media, but also gave two examples of adverts that fell into this category. The first was a spoof ‘viral’ advert from 2005 showing an inept terrorist blowing himself up in a car<sup>18</sup>. Many in the group had seen it online<sup>19</sup>, were unaware that it was not officially sanctioned by the company, and felt it was highly offensive.

The second advert that was mentioned was for Patak’s curry<sup>20</sup>, and, though the advert itself was felt to be well-intentioned, there was some annoyance that the child narrator had such a strong Indian accent, despite the implication that he grew up in this country.

Participants in the Christian groups were also concerned about the portrayal of their religion in the media generally. They found it difficult to identify any adverts of this type they had seen and had few concerns about the examples tested during the discussion. However, their

<sup>18</sup> <http://www.guardian.co.uk/technology/2005/jan/23/arts.artsnews>

<sup>19</sup> <http://www.youtube.com/watch?v=HnL-7x4n4d8>

<sup>20</sup> [http://www.youtube.com/watch?v=fnnH\\_gtWBwU](http://www.youtube.com/watch?v=fnnH_gtWBwU)

assumption was that the only religion that would be negatively portrayed in advertising would be Christianity.

**“They wouldn’t dare show another religion in that way I don’t think.”**

Male, Christian Group, London

**“[Antonio Federici] is building on the stereotypes and allegations.”**

Female, Christian Group, London

## 9. Understanding perceptions of harm and offence

Participants' perceptions of both harm and offence depended on a complex mix of factors.

Offence was seen as personal and subjective, and each individual's combination of views was different. While some participants were more likely to be offended overall there is no straightforward way to segment participants based on their perceptions and experiences. Individuals who felt very strongly about one type of harmful or offensive material could be much less worried than other participants about a different issue.

There was greater consensus about the types of advertising that is harmful, particularly to children. But even on these issues views still differed. In particular, participants disagreed about the extent to which content should be banned or restricted through regulation, or whether it should primarily be the responsibility of parents to protect their children.

Despite this complexity, the research does highlight a number of key factors which seem to be important in shaping views on harmful and offensive content in advertising (and in the media more generally):

- **Media usage:** participants' usual media consumption and how familiar they were with advertising on different media was important in shaping their views, particularly when considering whether example adverts were unusual or consistent with prevailing standards (even if they did not always agree with them).
- **Perceptions of advertising generally:** the extent to which participants were positive, neutral or negative towards the role of advertising in general made a difference to how much leeway they gave to offensive content (less so on issues of harm).
- **Personal experience with particular issues:** negative personal experiences, or those through friends and family, were one of the reasons participants gave for seeing advertising content as offensive or harmful (e.g. harmful products, experiences of different types of discrimination).
- **Religious and other belief systems:** advertising that came up against strongly held beliefs usually caused offence (and was considered harmful) unless participants did not take the advert seriously. This was often linked to personal beliefs (in the case of offence) and beliefs about how society should protect different groups (in the case of harm).
- **Views on media regulation:** general views on the extent to which regulation should constrain free expression was particularly important when participants considered how offensive and harmful advertising should be dealt with.

## Appendix 1 – Views of specific adverts

In the workshops and groups, participants were shown a selection of adverts which the ASA had received complaints about. The adverts were grouped together thematically, but not all adverts were shown in each discussion. The rotation used for each group was unique other than showing the adverts for sex shops and lap dancing near the beginning.

Below is a summary of how the adverts were received, and the extent to which they were considered to be offensive or harmful.

It is worth emphasising that many participants had few or no concerns about some of the adverts they were shown. As such, these findings highlight the aspects of adverts that some participants found more problematic. Overall, those that the ASA had upheld against were more likely to provoke a stronger reaction.<sup>21</sup>

### Group 1 – Sex shop and lap dancing club adverts



The three adverts that were shown were 'Sexy Adult Store', 'Heaven' and 'Urban Tiger'. The level of offence tended to depend on the pictures that featured in the adverts.

'Urban Tiger' was viewed as inoffensive by most participants as the picture shown was felt to be relatively innocuous, and the sexual element of the advert was considered less overt.

By contrast, the picture in the 'Heaven' advert was felt to be more provocative, and there were also concerns about the religious associations in the advert. However, due to the inference that the advert was located in an 'adult' area of town (as it boasted that "you're only 10 steps from the doors of Heaven") some thought that it was acceptable for this advert to be shown, as children were not likely to be in this area and see the advert.

The 'Sexy Adult Store' advert appears to be located on the side of the road, and there were concerns from parents about what the impact would be if they were driving past in a car with their children. Furthermore, many objected to the capitalisation of the word "Sex". Others were uncomfortable with the 'seedy' feel of the advert, compounded by the location of the shop in an industrial estate.

<sup>21</sup> See Appendix 2 for more details.

## Group 2 – Perfume adverts



The three adverts tested were print adverts for 'Obsession' and 'Agent Provocateur', and a television advert for 'Beyonce – Heat'.

As it was felt to be more appropriate to the product, there were fewer objections to the level of nudity used in these adverts. Many argued that this type of content is commonplace in perfume adverts nowadays. The 'Agent Provocateur' advert was considered more provocative by some participants.

If these print adverts were shown in magazines targeted at adult women then they would be broadly acceptable. However, a few participants had concerns about the visibility of such adverts in public places – for example on bus stops or in shops – where they might be seen by children.

For the TV advert, some commented that the sexual content was relevant for a product named 'Heat'. There were mixed views about whether this would be acceptable for a pre-watershed TV audience.

### Group 3 – Bikini and underwear adverts



The three adverts tested were for 'Calvin Klein', 'H&M' and 'M&S'. Generally, as the adverts were for underwear, the adverts were seen to be in keeping with the product, and appropriate ways for such products to be marketed. For some, it was even seen to be necessary to show women in this way in order to advertise these products, and most did not feel these types of adverts were harmful to children per se.

There were issues around the poses that some of the models were striking. In the M&S advert, some felt that the model's pose was too sexually suggestive, as opposed to the H&M advert, which was felt to be reminiscent of a 'holiday snap'. Similarly, the Calvin Klein advert was seen as more acceptable because the pose was less provocative than the M&S advert.

Many participants said that these sorts of adverts are quite commonplace, and that they were often visible in public places. Many objected to the use of what were perceived to be unrepresentatively skinny models, rather than the actual level of nudity in the advert.

## Group 4 – Objectification



The two adverts tested were for 'Rustlers' and 'Aero Bubbles'. Most found the adverts harmless due to their light-hearted tone, though there were concerns about the portrayal of 'laddish' behaviour in the 'Rustlers' advert, in which a woman undresses in the time it takes for the man to heat up food. It was this suggestion that getting sex should be this easy that some found offensive.

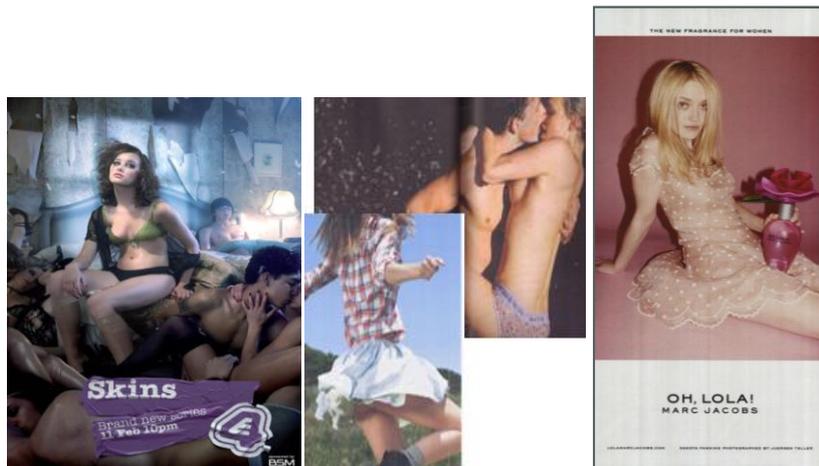
Perhaps because it was obviously tongue in cheek, participants found the 'Aero Bubbles' advert harmless, and most found the line "Has he been talking?" funny. Where there were mild concerns, these were at the use of male nudity in an advert that might be seen by young girls. Participants did not feel that the advert objectified men in a way that was offensive or harmful.

### Group 5 – Durex ‘Do you like it loud?’ adverts



Context was crucial to how these adverts were perceived, with some feeling that the tone in these adverts – particularly the phrase “Make some noise for the boys” was inappropriate, as there were gender and sexual connotations that participants were uncomfortable with. When told that the posters were shown on the way to a ‘Take That’ concert, however, most participants accepted that this was an inventive marketing campaign, provided it was not targeted at young teenagers.

### Group 6 – Sexualisation of children

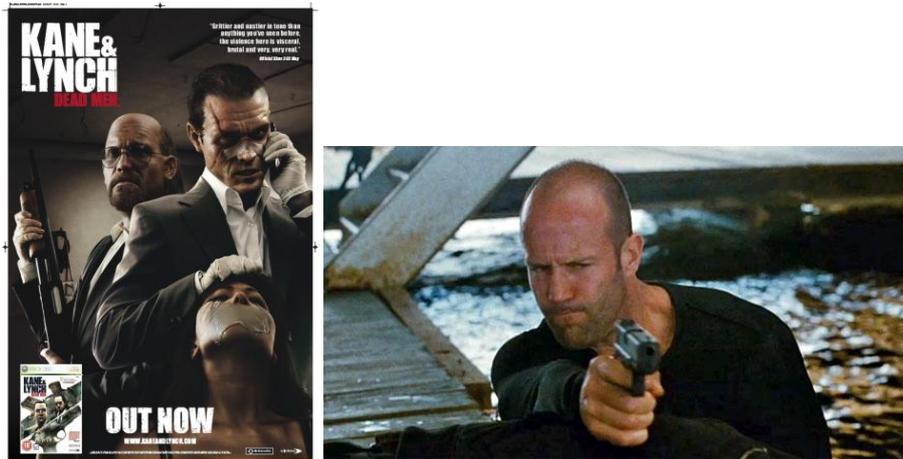


The three adverts shown were for ‘Skins’, ‘Jack Wills’ and ‘Marc Jacobs perfume’. Many participants found these adverts offensive for their portrayal of either nudity or sexuality of young people. Though some who knew the show felt that the ‘Skins’ advert was in keeping with its premise, there was still concern about the depiction of what looked like an orgy, and some commented that the female model in the foreground has a look of regret on her face.

The Jack Wills advert confused participants, as it was unclear what the product or brand was, and few understood how nudity was an appropriate way to sell clothing. For some, the offence lay in the fact that the girl’s face is not visible, while others simply thought the models looked too young.

Some strongly objected to the Marc Jacobs advert as the bottle of perfume was felt to be phallic, while others did not get this allusion and did not find it offensive. There were concerns about the exploitative feel of this advert, in which the model was felt to be purposefully portrayed as childlike in terms of her dress, pose, and expression.

## Group 7 – Violence



The adverts shown were for the video game 'Kane and Lynch' and the trailer for 'The Mechanic'. The Kane and Lynch advert, when shown with the tied-up female figure in the foreground, was felt to be distasteful, though, again, some who knew the game felt it was an appropriate way of advertising a violent game. When only the top half of this advert was shown, there was less negativity towards it – concerns became much stronger when the woman was in view.

Most felt 'The Mechanic' trailer was simply too violent to be shown on television without a warning. Others called for it to be banned altogether because of the potential to harm children. While some felt that the individual instances of violence were less problematic (as they were brief), others felt that the advert simply tried to condense as much violence as it possibly could, making it more concerning.

## Group 8 – Stereotyping



The adverts shown were 'Trident – mastication for the nation' advert and 'Pot Noodle' advert with Welsh miners.

None were offended by the 'Trident' advert, although many struggled to understand what was happening in the advert. Generally, it was felt to be a little incoherent, and even those who did pick up on the potential stereotyping were unconcerned.

Opinion was divided on the 'Pot Noodle' advert. Many participants, even in Wales, liked the advert, as it was felt to use 'cult' humour and be avant-garde. For many, it was clearly not designed to be taken seriously, and this mitigated against any offence it might cause. However there were some concerns that miners themselves might think differently of their profession being opened up for ridicule, indeed, many felt that they were the group most at risk of being offended by this advert, rather than Welsh people.

## Group 9 – Religion



The adverts shown were for ‘GHD hair’ and for ‘Antonio Federici ice cream’. None objected to the ‘GHD Hair advert’, as few picked up on the religious symbolism in the advert despite the tagline “Thy will be done”. Indeed, most were more preoccupied by trying to understand what was being said in the advert, and missed the narrative running through it and the relevance of the symbolism.

However, the opposite was true with the ‘Antonio Federici’ adverts which were felt to be deeply offensive, especially to those of the Christian faith. Many felt the advertisers had gone out of their way to be offensive, and these adverts were particularly disliked as there was no connection between the product and religion itself. There was general agreement amongst Christians and non-Christians that such adverts should be banned, even if many did not find them personally offensive.

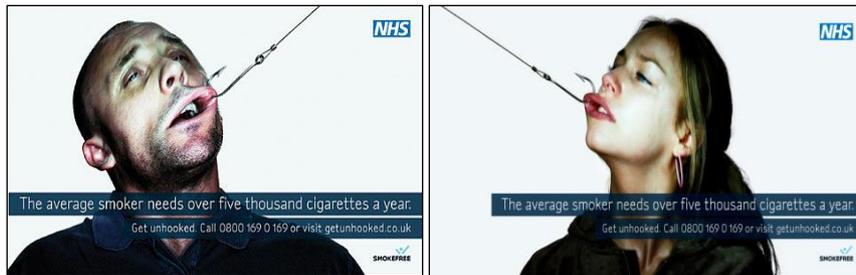
## Group 10 – Portrayal of disability



The adverts shown were for ‘Virgin Mobile’ and ‘Paddy Power’. The first, showing bored inmates of an asylum, was not felt to be offensive towards those in institutions or with mental illnesses as, again, it was tongue in cheek, and not felt to be intended to be taken at face value. Participants did not feel that it portrayed mental illness in a negative light – their ‘naughty’ behaviour was not seen to be particularly reflective of those in institutions, as opposed to bored people.

The second, with a depiction of blind footballers, was viewed much more negatively, however this was mostly due to the suggested portrayal of animal cruelty (with a cat kicked into a tree) rather than the use of blind footballers. Again, few saw an obvious link between the footballers and the product itself, which tended to compound the offence.

## Group 11 – Public service adverts



Participants were shown both the print and TV versions of the NHS 'hook' stop smoking advert, and they divided opinion more than any of the other examples shown.

Many reacted strongly to the shocking imagery used and found the adverts unsettling. Those who felt they went too far thought it would be possible to reinforce the idea that it was easy to get 'hooked' on cigarettes without using a depiction of a hook. There was also a concern about harm to children from coming across these adverts.

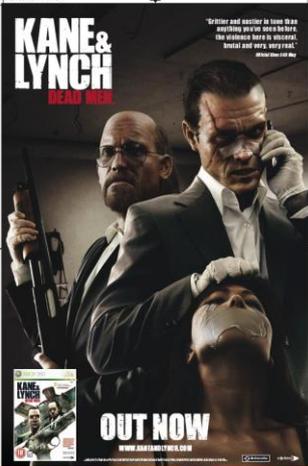
On the other hand, a significant minority of participants considered this more shocking type of approach as more acceptable because of the aim of the advert to encourage people to give up smoking. Indeed, a few actively supported this type of hard-hitting advertising for public awareness campaigns.

## Appendix 2 – Results of adjudications on specific adverts

Advert	Number of complaints	Outcome
<p><b>Sexy Adult Store</b></p>  <p>A billboard for 'SEXY ADULT STORE' featuring a woman in a bikini. Text on the billboard includes 'pulse &amp; cocktails', '24 CAM SQUARE, WILBURY, 894 INDUSTRIAL ESTATE, SGA OTZ, Tel: 01482 431842', and 'PULSEANDCOCKTAILS.CO.UK'.</p>	5	<p><b>Not Upheld</b> Because the advert was not explicit and was not placed near a school.</p>
<p><b>Heaven</b></p>  <p>A billboard for 'Heaven' nightclub. Text includes 'Call Heaven on 01206 766046', 'www.heavengentlemenclub.co.uk', 'Heaven', 'Glasgow's exclusive lap dancing club', '100 Douglas Street, Glasgow, G2 3JF, Scotland', and 'You're only 10 steps from the doors of Heaven'.</p>	1	<p><b>Not upheld</b> ASA Council decided that the complaint did not require further investigation. The advert was not explicit and, while distasteful to some, was unlikely to cause serious or widespread offence or harm to children.</p>
<p><b>Urban Tiger</b></p>  <p>A billboard for 'URBAN TIGER GENTLEMEN'S CLUB'. Text includes 'NORTHAMPTON'S FINEST LAPDANCING CLUB', 'Luxurious table dancing venue', 'Stag Parties &amp; special events', 'Corporate entertainment', and '32 Abington Square, Northampton   www.urbantigerclub.co.uk   Tel: 01604 824 766'.</p>	4 complaints	<p><b>Not upheld</b> ASA Council decided that the complaint did not require further investigation. While some may find the advert distasteful, it did not feature explicit or overtly sexual content. It was concluded that the advert was unlikely to cause serious or widespread offence, to be seen as objectifying women or to cause harm to children.</p>
<p><b>Eva Mendez Obsession</b></p>  <p>An advertisement for 'Obsession' perfume featuring a woman lying on a white sheet, partially nude. A bottle of 'Obsession' perfume is visible in the bottom right corner.</p>	1 complaint	<p><b>Not upheld</b> While the woman was clearly naked, the image was not explicit. While some people may find any depiction of nudity objectionable, the advert was unlikely to cause serious or widespread offence or to cause harm to children.</p>

<p><b>Beyonce – Heat</b></p> 	<p>21 complaints</p>	<p><b>Upheld in part</b> The ASA considered that the advert should not have been shown before 19.30 due to the sexually provocative nature of the imagery.</p>
<p><b>Calvin Klein underwear</b></p> 	<p>1 complaint</p>	<p><b>Not upheld</b> The ASA felt that the nature of the product meant that viewers of the advert were less likely to regard it as gratuitous or offensive, and noted that the poses of the model were natural.</p>
<p><b>M&amp;S Autograph</b></p> 	<p>15 complaints</p>	<p><b>Upheld</b> The image of the woman kneeling on the bed was of an overtly sexual nature and was therefore unsuitable for untargeted outdoor display, as it was likely to be seen by children.</p>
<p><b>H&amp;M</b></p> 	<p>No complaints received</p>	<p>N/A</p>
<p><b>Rustlers</b></p> 	<p>242 complaints</p>	<p><b>Partly upheld</b> Concerns about the content – not upheld, but upheld for inappropriate scheduling when children might see it.</p>

<p><b>Aero Bubbles</b></p> 	<p>4 complaints</p>	<p><b>Not Upheld</b> Mild and light hearted.</p>
<p><b>Durex</b></p> 	<p>1 complaint</p>	<p><b>Not upheld</b> The posters contained no graphic references to sex or sexually explicit imagery and, in the context of their appearance in conjunction with that of Take That, were likely to be read as a play on words based on a typical audience reaction.</p>
<p><b>Skins</b></p> 	<p>42 complaints</p>	<p><b>Upheld</b> The image implied that an orgy was taking place. The ASA concluded that the poster could cause serious or widespread offence to those who saw it and was unsuitable to be used in a medium where it could be seen by children.</p>
<p><b>Jack Wills</b></p> 	<p>19 complaints</p>	<p><b>Upheld</b> Because younger teenagers could have both direct and indirect access to the catalogue, the ASA concluded the images were sufficiently provocative as to present a risk to younger teenagers.</p>

<p><b>Marc Jacobs</b></p>  <p>THE NEW FRAGRANCE FOR WOMEN</p> <p>OH, LOLA! MARC JACOBS</p>	<p>4 complaints</p>	<p><b>Upheld</b> For sexualising a child.</p>
<p><b>Kane &amp; Lynch</b></p>  <p>KANE &amp; LYNCH DEAD MEN</p> <p>"Killer and master he took the anything you've seen before. the violence here is intense, brutal and very, very real."</p> <p>OUT NOW</p> <p>WWW.KANEANDLYNCH.COM</p>	<p>26 complaints</p>	<p><b>Upheld</b> Graphic violence.</p>
<p><b>The Mechanic</b></p> 	<p>13 complaints</p>	<p><b>Upheld</b> The level of violence meant it was not suitable for broadcast at any time.</p>
<p><b>Trident</b></p> 	<p>518 complaints</p>	<p><b>Upheld</b> For using a harmful stereotype.</p>

<p><b>Pot Noodle</b></p> 	<p>9 complaints</p>	<p><b>Not upheld</b> Light hearted.</p>
<p><b>GHD</b></p> 	<p>26 complaints</p>	<p><b>Upheld</b> Eroticised images of women apparently in prayer, in conjunction with religious symbols such as the votive candle and the rosary beads, the use of the phrase “thy will be done” from the Lord’s Prayer and the image of the letter ‘t’ as the Cross of Jesus, were likely to cause serious offence, particularly to Christians.</p>
<p><b>Antonio Federici (priests)</b></p> 	<p>6 complaints</p>	<p><b>Upheld</b> Showing two priests in a sexualised manner was likely to be interpreted as mocking the beliefs of Roman Catholics and was therefore likely to cause serious offence to some readers.</p>
<p><b>Antonio Federici (nun)</b></p> 	<p>10 complaints</p>	<p><b>Upheld</b> The ASA considered the use of a nun pregnant through immaculate conception was likely to be seen as a distortion and mockery of the beliefs of Roman Catholics.</p>
<p><b>Virgin Mobile</b></p>	<p>48</p>	<p><b>Upheld</b></p>

	<p>complaints to the ITC</p>	<p>Negative portrayal of mental health issues</p>
<p><b>Paddy Power</b></p> 	<p>1091 complaints</p>	<p><b>Not Upheld</b> Humorous</p>
<p><b>Department of Health</b></p> 	<p>774 complaints</p>	<p><b>Upheld in part</b> Unsuitable for scheduling where children might see them</p>

## Appendix 3 – Topline results

### General public survey

- A sample of 1,288 members of the public were interviewed for this survey
- This included a representative sample of 1,000 adults aged 15+ and an additional boost of parents
- The survey was conducted using Computer Assisted Personal Interviewing (CAPI)
- Fieldwork took place between 30 Mar – 5 April 2012
- Data are weighted to match the profile of the population of GB
- Where results do not sum to 100%, this may be due to multiple responses, computer rounding or the exclusion of don't knows/not stated
- Results are based on all respondents (1,288), unless otherwise stated.
- An asterisk (\*) represents a value of less than one half of one percent, but not zero.

Q1 Please tell me which of the following best describes your experiences of advertising on [MEDIUM]? Would you say that in the last 12 months...?

	TV	Radio	Posters or bill- boards	Mail through your door	News- papers	Maga- zines	Internet	Cinema
	%	%	%	%	%	%	%	%
I have been personally offended by an advert or adverts	9	3	6	4	4	4	5	1
I have seen an advert or adverts that other people might have been offended by	14	4	10	4	8	10	12	4
I have not seen any adverts that could have offended me or anyone else	49	49	50	55	49	49	41	44
I have not seen any adverts in that format	26	40	30	34	35	34	37	45
Don't know	4	5	5	4	4	4	5	6

Q2 Thinking of the most recent time that this happened on [MEDIUM], how offensive did you find the advert?

	TV	Radio	Posters or bill-boards	Mail through your door	News-papers	Maga-zines	Internet	Cinema
<i>Base: all those offended</i>	116	34*	79	43*	51	51	75	17*
	%	%	%	%	%	%	%	%
Very offensive	31	21	21	19	19	29	33	18
Fairly offensive	56	45	51	44	57	51	53	59
Not very offensive	8	10	16	25	11	15	8	19
Not at all offensive	3	22	9	13	7	2	6	4
Don't know	2	3	3	-	5	3	-	-
<b>Offensive</b>	87	66	72	62	76	80	86	77

Q3 Again, thinking of the most recent time that this happened on [MEDIUM], what was the main reason that you were offended by it?

	TV	Radio	Posters or bill-boards	Mail through your door	News-papers	Maga-zines	Internet	Cinema
<i>Base: all those offended to some extent</i>	110	25*	70	37*	44*	47*	72	16*
	%	%	%	%	%	%	%	%
Sexual imagery	16	9	25	9	11	18	26	2
Sexual references	10	4	5	3	4	7	1	3
Bad language	6	23	4	6	-	3	6	9
Violence	8	11	9	9	14	6	6	27
Sexist about men	-	-	1	-	3	-	-	-
Sexist about women	13	7	13	15	20	19	18	19
Portrayal of age	4	7	-	2	3	2	1	-
Portrayal of race	6	4	7	5	7	5	8	-
Portrayal of religion	1	-	1	-	1	1	2	-
Portrayal of disability	3	-	7	-	4	-	3	-
Aggressive selling	15	12	4	13	14	11	10	8
Scary content	6	10	6	10	14	15	8	10
Don't know	13	13	19	29	6	14	10	21

\* NB Small base sizes

Q4. Which, if any, of the following statements comes closest to your view about whether or not rules should be in place to protect children under 16 from potentially harmful adverts?

	%
There should be specific rules in place and they should be the same for all children under 16	52
There should be specific rules in place but they should be different for different age groups (eg different rules for under 12's and 12-16 year olds)	35
There should be no specific rules in place to protect children under 16	8
Don't know	5

Q5. Now, I'm going to show you some adverts for lap dancing clubs and sex shops. These have all been shown on posters or billboards in public and all have resulted in complaints from members of the public. Are you happy to look at the adverts and tell me what you think?

	%
Yes	66
No	34

Q6a. Thinking about this advert, how offensive, if at all, would you say it is to you personally?

Q6b. Thinking about this advert, how harmful, if at all, would you say it is for children under 16?

	Offensive to you			Harmful to under 16s		
	Heaven	Urban Tiger	Sexy Adult Store	Heaven	Urban Tiger	Sexy Adult Store
<i>Base: All who agree to look at adverts (801)</i>	%	%	%	%	%	%
0	39	46	38	12	21	11
1	6	8	7	2	3	2
2	7	8	8	3	6	4
3	6	7	6	5	5	4
4	8	4	5	4	5	4
5	9	7	8	8	10	10
6	3	3	4	7	7	5
7	4	4	5	9	8	8
8	7	3	6	14	9	14
9	2	1	2	8	7	8
10	9	5	9	26	17	27
Don't know	1	2	1	2	2	2
Mean	<b>3.3</b>	<b>2.4</b>	<b>3.3</b>	<b>6.4</b>	<b>5.1</b>	<b>6.5</b>

**Q7a. In general, do you think it is acceptable for adverts for lap dancing clubs and sex shops to be shown on posters or billboards in public without restrictions, to be shown in public but with restrictions, or should they be banned completely?**

	%
It is fine for adverts like these to be shown in public without restrictions	5
It is fine for adverts like these to be shown in public but with restrictions	43
Adverts like these should be banned completely in public	46
Don't know	6

**Q7b. In your view, if any, of the following restrictions are important to apply to adverts for lap dancing clubs and sex shops shown on posters or billboards in public?**

	%
<i>Base: All who feel restrictions should apply (528)</i>	
Restrictions on where adverts like these are shown (e.g. not near a school)	72
Restrictions on the images used in adverts like these	64
Restrictions on the language used in adverts like these	54
Don't know	1
None of these	1

## Topline results – Young people survey

- A sample of 1,020 teenagers aged 11-16 were interviewed for this survey
- The survey was conducted online
- Fieldwork took place between 5-17<sup>th</sup> April 2012
- Where results do not sum to 100%, this may be due to multiple responses, computer rounding or the exclusion of don't knows/not stated
- Results are based on all respondents (1,020), unless otherwise stated.
- An asterisk (\*) represents a value of less than one half of one percent, but not zero.

**Q1. Have you come across anything on television or radio, on the internet, on billboards and posters, or in newspapers and magazines that has bothered you in any way in the last 12 months?**

	%
Yes	31
No	52
Don't know	17

**Q2. Have you come across any adverts in any of these places that have bothered you in any way in the last 12 months?**

	%
Yes	30
No	57
Don't know	12

**Q3a In which, if any, of these places have you come across these kinds of things that bothered you in the last 12 months? Adverts in or on...**

	%
<i>Base: All who have come across an advert that has upset them in the last 12 months - 308</i>	
Television	75
Internet	39
Magazines	28
Newspapers	26
Posters or billboards	24
Cinema	16
Mail through your door	11
Radio	10
Other	1
Don't know	1

**Q3b And where online has this happened to you in the last 12 months?**

*Base: All who have come across an online advert that has upset them in the last 12 months - 121* %

General surfing/browsing	59
On a social networking site	55
On a TV channel/programme website	46
By email	31
On a gaming website	24
While doing school work	21
Downloading or playing music	21
On a shopping website	19
Other	1
Don't know	1

**Q4. Thinking about the last time you came across something like this in an advert, what was the main reason that you were bothered by it?**

*Base: All who have come across an advert that has upset them in the last 12 months - 308* %

The advert was too sexy	25
People died or were hurt in the advert	15
It was scary	11
The advert was unfair or nasty about certain types of people	10
People in the advert were naked	10
The advert made me feel bad about myself	7
It was violent	6
The advert used bad language/swearing	5
Other	7
Don't know	3

**Q5. Thinking about the last time you were bothered by something like this, how upset, if at all, did you feel about it?**

*Base: All who have come across an advert that has upset them for a specific reason - 288* %

Very upset	20
Fairly upset	42
A bit upset	31
Not at all upset	4
Don't know	2

**Q6. And how long did you feel like that for?**

*Base: All upset by an advert to some extent - 288* %

I got over it straight away	24
For a few hours	39
For a day or so	20
For a few days	9
For a few weeks	3
For a couple of months or more	3
Don't know	2

Q7a We are now going to ask you some questions to find out how you feel about the adverts that you come across.

Please tell us whether or not you come across adverts that make you feel the following things.....

	Adverts that you feel might bother younger children	Adverts that make you feel bad about the way you look	Adverts that make you feel bad because you can't afford to buy things being advertised
	%	%	%
Often come across adverts that make you feel this way	10	14	20
Sometimes come across adverts that make you feel this way	41	35	46
Never come across adverts that make you feel this way	33	44	29
Don't know	16	7	6

Q7b To what extent, if at all, do you agree or disagree that some people are too sensitive about the things they see in adverts?

	%
Strongly agree	12
Tend to agree	47
Tend to disagree	22
Strongly disagree	4
Don't know	15
<b>Agree</b>	<b>59</b>
<b>Disagree</b>	<b>26</b>

## Appendix 4 – Scoping phase

### Introduction

As part of an ongoing project examining the public's views on harm and offence in UK advertising, Ipsos MORI has brought together relevant evidence from previous research in this Scoping Review Summary.

The scoping review took a pragmatic approach to identifying sources of data, drawing on the ASA's knowledge of existing findings and following up on references in several key reports. Internet searches were also conducted to uncover additional research relevant to harm and offence in advertising.

As authors of existing work in this area have commented, there has been relatively limited research exploring harm and offence, and commissioning more was a key recommendation for the ASA from the Bailey Review. While the recommendations from the Bailey Review focus on exploring the sexualisation and commercialisation of childhood, an improved understanding of perceptions of harm and offence in advertising more generally will also be invaluable.<sup>22</sup>

This summary will act as a reference document for the project as a whole, ensuring the primary research complements and builds on existing work in this area.

### Defining harm and offence

Discussions around harm and offence are to some extent determined by the distinctions between the two terms. Though they are frequently used in conjunction with one another, they represent two different aspects of the debate about media and content. Hargrave and Livingstone's summary of their book *Harm and Offence in Media Content* (2006) defines the two terms in the following ways:

- "Harm is widely (though not necessarily) conceived in objective terms; harm is taken to be observable by others (irrespective of whether harm is acknowledged by the individual concerned), and hence as measurable in a reliable fashion."
- "Offence is widely (though not necessarily) conceived in subjective terms; offence is taken to be that experienced by and reported on by the individual, and hence is difficult to measure reliably (and, equally, difficult to deny in the face of claimed offence)."<sup>23</sup>

They note that the terms differ in other important ways: harm as a result of media exposure can affect both the media user themselves and people around them, lasting for a short or long period of time, at the individual, group or societal level. In contrast, offence is assumed to apply "only in the moment" to the media user.

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<sup>22</sup> Complaints to the ASA about the perceived negative impact of an advert on children make up a small minority of the overall number of complaints: from 2008-2010 just 4.6% of the advertisements that drew complaints and 10% of the complaints overall were on the grounds of their impact on children.

<sup>23</sup> Hargrave and Livingstone, *Harm and Offence in Media Content: A review of the evidence* (2006)

The review also highlights that harm and offence are generally discussed differently in relation to children and adults because harm is assumed to vary by vulnerability, and is therefore a greater risk for children and for vulnerable adults (which has been reflected in the type of research carried out to date).<sup>24</sup>

A report by Credos (the advertising industry's think tank) supports this, arguing that: "Certain groups – the young, old, poor and disadvantaged – are 'hotspots' for public concern".<sup>25</sup>

Hargrave and Livingstone argue that there are several implications of these definitions:

- Firstly, it is "potentially easier" to demonstrate offence than harm, as harm requires a higher evidence threshold;
- That the risk of harm "merits greater attempts at prevention than does offence";
- That organisations may to a certain extent be expected to avoid or address issues of offence in order to avoid damage to their brand, though public intervention "may be required" to prevent harm;
- The lack of existing research into whether the media offends children (rather than harms them) results in what the authors described as "some inconsistencies" when discussing research findings in this area. They illustrate this point using the example that if a child is upset by viewing violence, this is seen as evidence of harm, whereas if an adult views and is upset by the same image, this is likely to be considered offence.<sup>26</sup>

Research by BMRB in 2002 for the ASA found that offence can be broken down into two types: emotional and rational.<sup>27</sup> This research suggested that emotional offence is the more 'serious' of the two types as it is more likely to be felt personally. Just under one in five (19%) adults said they had been offended personally by advertising in the last 12 months. However, when people are offended 'by proxy' on behalf of others or society more generally, this is a more rational type of offence. Around a third (32%) of adults said they had seen advertising that they felt other people may have been offended by. While there may be genuine concern from individuals on behalf of others, it is also possible that this proxy offence is the result of a "projective element" on behalf of offence they feel themselves.

Examples of harm given in the research literature (for example, McQuail & Windahl, 1993), include:

- Changing the attitudes or beliefs of either at an individual level (for example, increasing someone's fear of violent crime) or societal level (such as stereotypes of a certain group);
- Changing behaviours, particularly the "increased propensity to harm others (e.g. aggressive behaviour, this damaging both the perpetrator and his/her possible victims) or for self-harm (e.g. anorexia, obesity, suicide)";
- And finally emotional responses, which can affect both the individuals and others around them, which may lead to harm if they continue for a long time. Though the

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<sup>24</sup> Hargrave and Livingstone, *Harm and Offence in Media Content: A review of the evidence* (2006)

<sup>25</sup> Credos, *Advertising: What the UK Really Thinks* (March 2011)

<sup>26</sup> Hargrave and Livingstone, *Harm and Offence in Media Content: A review of the evidence* (2006)

<sup>27</sup> BMRB, *Serious offence in non-broadcast advertising* (2002), p.2

authors note that these responses “may, arguably, be more appropriately regarded instead as offence”.<sup>28</sup>

Previous research in this area has tended to focus on a few specific demographic groups, by and large the concern ‘hotspots’ mentioned earlier. The key features of previous research have been summarised by Livingstone and Das, who found in their review of research into public attitudes:

- There has been more qualitative research, providing in-depth analyses of why people respond to content as they do, than quantitative research with large-scale samples or research using mixed methods;
- There is little comparative research that contextualises attitudes towards offence, decency and standards or that compares findings across a range of social groups or media platforms
- Little research is available for newer genres, platforms and formats;
- Audiences vary in what they find acceptable according to their social context of viewing;
- Ethnicity and gender are by far the most researched attributes of audiences;
- Adults’ tastes and expectations are far more researched than those of young people.

## Public concerns – content and context

The ASA is one of a number of bodies responsible for the regulation of media content, alongside organisations such as Ofcom and the British Board of Film Classification (BBFC). The BBFC carried out research in 2005, and found that the issues which people found most offensive in films were<sup>29</sup>:

- Drugs and drug taking – 75%
- Violence – 65%
- Sexual activity – 56%
- Swearing and offensive language – 49%
- Racial references – 46%
- Religious references – 34%

While the first of these issues is less likely to appear or be referenced in an advertisement, the others are certainly relevant considering the adverts which the ASA has recently been asked to make a decision on.

The ASA’s previous research in 2002 asked respondents to rate the sensitivity of a list of subjects that could be seen in advertising. The most sensitive was children being shown in a

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<sup>28</sup> Quoted in Hargrave and Livingstone, *Harm and Offence in Media Content: A review of the evidence* (2006)

<sup>29</sup> Quoted in Livingstone and Das, *Public Attitudes, Tastes and Standards* (March 2009) p.5

sexual way, followed by concerns about the portrayal of women and content unsuitable for children. There were also differences between groups in the population when it came to their relative sensitivity about different subjects. For example, younger people were less worried about sexual images, violence and bad language, but more concerned about how groups and individuals were portrayed.<sup>30</sup>

Another finding from previous research is that when discussing their concerns about the potential for advertising to cause harm and offence, people do not generally report that they are offended themselves, or that they are concerned about society as a whole. Instead they claim to be concerned about the impact of harmful or offensive advertising on a specific group they perceive to be vulnerable from the effects of advertising, such as children or older people.

This may be based on the belief that advertising has a “disproportionate effect” on others, despite believing that advertising has “little effect on them personally”.<sup>31</sup> Similarly, research in this area with children has found that even children under the age of 16 will often express concern on behalf of younger children or siblings:

*If [the ad] is outside it's a bit bad if you've got little kids with you. . . . Yeah. I think it's all right our age. It's just a bra.*

(14-15 year old male participant in previous ASA research, 2011)

Many parents in particular are concerned about what they consider to be inappropriate images displayed in public areas. In the Bailey Report's Call for Evidence from parents, 576 of the 846 respondents said that they had seen images inappropriate for children while out in public with their children during the last few weeks:

- 134 mentioned shop displays (with the majority concerned about 'lads' mags' in newsagents and supermarkets);
- 113 respondents were unhappy with street advertising (such as billboards and posters in bus shelters);
- 63 respondents specifically mentioned the sexual imagery in advertisements for perfume and lingerie.<sup>32</sup>

This supports findings from previous ASA research which found that location or an advert, who was likely to see it, and whether they had any choice in doing so was a key element in the likelihood of it causing offence.<sup>33</sup> Similarly, research for the ASA in Cardiff found that young people were particularly shocked by what they perceived to be an inappropriate advert for a table dancing club when they realised it had been placed at a bus stop:

*I think really they should limit where you can put it. . . . They could advertise it somewhere more private but not on display for all types of ages of people to see.*

(14-15 year old female, participant in previous ASA research, 2011).

*F: That's really bad . . . F: Terrible . . . F: And it's got directions, and at a busstop.*

(Pupils participating in an event for previous ASA research, 2011)

<sup>30</sup> BMRB, *Serious offence in non-broadcast advertising* (2002), p.4

<sup>31</sup> Credos, *Advertising: What the UK Really Thinks* (March 2011), p.4

<sup>32</sup> Bailey, *Letting Children be Children* (June 2011), p.25

<sup>33</sup> BMRB, *Serious offence in non-broadcast advertising* (2002), p.3

These concerns were confirmed by the recent survey carried out for the Bailey Review, which found that 40% of parents had seen things in public places in recent months that they felt were inappropriate for children to see because of their sexual content (though this included images other than advertisements).<sup>34</sup> While these figures do not show universal concern about these images among parents, as the Bailey report noted, it clearly shows concern among a significant minority of parents. A report by Credos also found that this extends to television advertising, as “Most parents of 7-11 year olds think there is ‘inappropriate advertising’ on TV”, despite the continuing watershed.<sup>35</sup>

However, the content or ‘message’ of an advertisement is also important (and not just the images used). As part of the Bailey review, qualitative research with parents found that when shown images of clothing advertisements, parents found that a clear message about the quality or cost of the clothing reduced their objection to the ad, even if it were more ‘visually sexual’ than an ad without the accompanying message.<sup>36</sup>

Turning to advertising through new media, there is fairly widespread concern about children’s access to inappropriate adverts on the internet. This is the result of several, overlapping issues:

- Research by Ofcom has highlighted the continued popularity of social networking sites: one third of 8-12 year-olds have a profile on sites that require users to register as being 13 or over (compared with a quarter in 2009), when looking at internet users aged 10-12 nearly half (47%) have a profile (up from 35% in 2009).<sup>37</sup> This increased social network use among under 13s reflects a rise in the use of the internet by children in general, making it more likely that they will see adverts (whether inappropriate or not) through this medium.
- However, as the Bailey report and a report by Credos have noted, if a child joins a social networking site using a false age, the site will believe them to be several years older than they really are. As a result, even if adverts on these sites are designed to be age-appropriate, these children will be in a higher age category increasing their risk of seeing adverts that are inappropriate for their real age. For example, if a child joined a social network at 9 though the age limit was 13, once the child reached 14 the site would believe them to be 18 and there is the risk of them showing ads which are inappropriate for the child’s real age.<sup>38</sup>
- Children’s exposure to inappropriate adverts may also be viewed by accident. A report by Livingstone and Bober (quoted in the Papadopoulos report) found that nearly 40% of 9–19-year-olds have accidentally seen a pop-up advert for a pornographic site; 36% say they have seen a pornographic website accidentally; 25% have received porn junk email; and 9 per cent have been sent pornographic images by someone they know. A recent YouGov survey also found that nearly one in five children had been sent pornography via email or their mobile phone without their consent.<sup>39</sup>
- It is increasingly difficult for parents to act as a filter when it comes to inappropriate material on the internet. According to the Byron report, many

<sup>34</sup> Bailey, *Letting Children be Children* (June 2011), p.25

<sup>35</sup> Credos, *Children and the commercial world* (June 2011), p.37

<sup>36</sup> Bailey, *Letting Children be Children* (June 2011), p.26

<sup>37</sup> Ofcom 2011 quoted in Bailey, *Letting Children be Children* (June 2011), p.63

<sup>38</sup> Credos, *Pretty as a Picture* (December 2011), p.8

<sup>39</sup> Papadopoulos, *Sexualisation of Young People Review* (February 2010), p.47

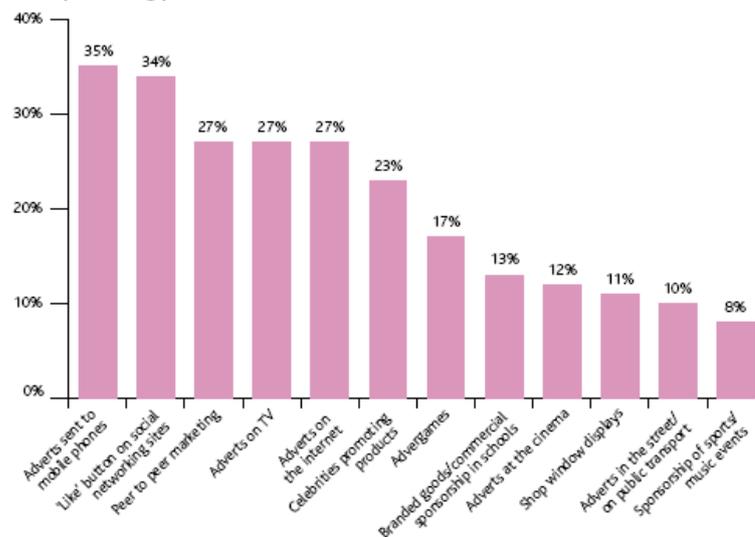
parents “either underestimate or do not realise how often children and young people come across potentially harmful and inappropriate material on the internet and are often unsure about what they would do about it”.<sup>40</sup> The findings of the UK Children Go Online (UKCGO) project suggest that this is exacerbated by the fact that few children make their parents aware of any unwanted or inappropriate material they encounter on the internet. This is despite the fact that up to a quarter of children (aged 7–16) may have been upset when they encountered unwanted material on the internet in addition to those who expressed ‘annoyance and disgust’, rather than being upset.<sup>41</sup>

## Children and advertising

When it comes to marketing directly aimed at children many parents have significant concerns about certain advertising tools. As the chart below shows, this is particularly true for newer, less familiar forms of advertising:

**Figure 10: Parents' views of marketing and advertising tools**

Do you think that any of these marketing and advertising tools should NOT be used when promoting products to children?



Source: TNS Omnibus Survey, 2011  
Weighted base: 1199 parents in the UK

As the Bailey Review noted, this is in part because parents feel less aware of these methods, and less confident of being able to mediate between them and their children. As a result, some parents even seem to consider these techniques to be “unethical” if used to advertise to children.<sup>42</sup>

Ability to critique advertising is certainly age-dependant and closely related to a child’s cognitive development. As the Byron report noted: “the ability to critically evaluate commercial material correlates to the development of the frontal lobes, and therefore it is

<sup>40</sup> Byron, *Safer Children in a Digital World* (March 2008), p.7

<sup>41</sup> Quoted in Buckingham, *The Media Literacy of Children and Young People* (2008), p.24

<sup>42</sup> Bailey, *Letting Children be Children* (June 2011), p.64

important that children are not exposed to commercial messages that they do not understand”.<sup>43</sup>

The more recent Buckingham review into children’s media literacy also cited a variety of research which suggests that children are able to distinguish adverts from other television content from a relatively early age (around two or three according to research by Jaglom and Gardner, 1981). However, the ability to understand that advertisements are intended to convince their audience to purchase particular products develops several years later when a child is around seven years old (ITC, 2002; Young, 1990).<sup>44</sup> In his report Buckingham also notes (referencing his earlier research in this field) that although children may be able to identify and even “display a considerable degree of cynicism about advertising” this does not necessarily mean that it does not influence them at the same time (Buckingham, 1993a: Chapter 8).<sup>45</sup>

By contrast, there is research evidence that, despite parental concerns, some (usually older) children are far more ‘savvy’ than their parents (and researchers) might expect. The bombardment of advertising perceived by older generations is part of the ‘wallpaper’ of children’s lives that the Bailey report identified and they are often used to it. Credos found that mothers of girls were also critical of ‘fake’ adverts such as those for mascara that artificially enhanced images, however the mothers were likely “to underestimate their girls’ ability to interpret these types of advertisements”.<sup>46</sup>

There is also evidence to suggest that ability to engage critically with adverts is context as well as age dependent. For example, there is existing research which suggests that children are able to critique advertising through more traditional media such as television.<sup>47</sup> Having said that, it is far from clear that this ability to critique some adverts transfers across all media platforms. When considering children’s contact with advertising on the internet for example, Buckingham’s report quoted research by Livingstone and Bober (2003; 2004a) which found that children were much less aware of the reasons websites exist and less able to adopt a critical approach towards the reliability of websites. From this survey, almost half of children believe that information on the internet can be trusted (49%), 38% trust most of it, and 9% trust ‘not much of it’.<sup>48</sup>

The literature also refers to research by Fielder, Gardener, Nairn and Pitt (2008) which found that even older children find it difficult to determine the purpose of some advertising approaches, for instance interactive ‘advergimes’. These games are designed to engage potential consumers with a product and associate it in their minds with the positive experience of the game. In a recent Australian study, children who played a game designed to advertise an unhealthy breakfast cereal were more likely to choose that cereal over a healthier alternative (54%) compared to a control group (32%), despite the fact that when questioned they did not believe it to be a healthier option.<sup>49</sup>

However, these difficulties are not confined to concerns about the ability of children to process adverts through new media. As a report by Livingstone and Das (2009) noted:

<sup>43</sup> Byron, *Safer Children in a Digital World* (March 2008), p.89

<sup>44</sup> Buckingham, *The Media Literacy of Children and Young People* (2008), p.21

<sup>45</sup> Buckingham, *The Media Literacy of Children and Young People* (2008), p.21

<sup>46</sup> Credos, *Pretty as a Picture* (December 2011), p.18

<sup>47</sup> Young (2010), quoted in Bailey, *Letting Children be Children* (June 2011), p.70

<sup>48</sup> Buckingham, *The Media Literacy of Children and Young People*, p.22

<sup>49</sup> Papadopoulos, *Sexualisation of Young People Review* (February 2010), p.31

“A single media product is now consumed across a range of platforms, including theatre screenings through posters, film merchandise and so on (Barker and Mathijs 2007), with different expectations applying to each. On the one hand, audiences relish gaining expertise in consuming a single media text across multiple platforms; but on the other, they are still developing new competencies for new genres.”<sup>50</sup>

A review of the media literacy of adults, published to accompany the Buckingham Report, made a similar point that:

“The changing conditions of advertising, sponsorship, branding, merchandising, paid-for-content, and other forms of promotion through broadcasting, the internet and mobile phones, set new literacy requirements. Little research exists on adults’ critical awareness of such promotional practices, nor on how better to support parental mediation of promotion to children”<sup>51</sup>

Possibly as a result of the ethical considerations associated with conducting research into people’s opinions (and especially children’s views) of sexualised images and adverts, there has been very little research in this area. Though the Sexualisation of Young People Report by Dr Linda Papadopoulos considered the increasing role of sexualisation in UK media, the focus of that report was predominantly on the psychological aspects of sexualisation and its effects rather than people’s – and particularly children’s – perceptions.

## Implications for the research

This review of previous evidence has enabled us to reflect not only on existing findings, but also gaps in knowledge and issues to bear in mind as we proceed.

From a practical perspective:

- Throughout the literature the advertising approaches of a few key ‘industries of concern’ are consistently referred to by experts and the public alike. These include the fashion and cosmetics industries, the gaming industry (both online gaming and more traditional console gaming) and the alcohol industry. It is interesting to note that concerns about these industries range from worries about those promoting age-restricted products (gaming and alcohol as detailed above) to a more nuanced discussion about what is age-appropriate in an industry that is not legally age-restricted. These views should be taken into account when choosing which adverts to use as examples.
- There is an issue about the level of understanding among the public about the ASA’s role. Many people can be confused about the process of regulation for advertising, presuming they go through a vetting process before launch, as with films.<sup>52</sup> This will need to be taken into consideration when designing the groups to ensure that people provide both top of mind and informed views.
- A survey conducted for the Bailey review found that 92% of parents have never complained about products or adverts in public places, on television, on the

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<sup>50</sup> Livingstone and Das, Livingstone and Das, *Public Attitudes, Tastes and Standards* (March 2009) p.16

<sup>51</sup> Kunkel & Wilcox, 2001; Montgomery & Pasnik, 1996

<sup>52</sup> Credos, *Children and the commercial world* (June 2011), p.37

internet, in a newspaper or in a magazine that they believed were inappropriate for children because of sexual content. The reasons given for this included those who never needed to complain (43%), those that did not think anything would be done (22%), and those who did not know who to complain to (15%) or did not get round to it (13%).<sup>53</sup> If, as these results suggest, people are offended but may not complain, our research design must make sure that people are not overstating their likely objections because it is easier to voice those concerns as part of the research. However, it is also important that those people who felt nothing would be done are given an opportunity to speak up.

Livingstone and Das concluded their 2009 review of research into public attitudes with implications for future research:

- Research must engage with both the context of the programme and the context of viewing, “in order to understand not just why some content may be more offensive on some programmes/genres than others, but also why it may be more offensive to some people/groups more than others”;
- That mixed methods research is important to allow findings to be generalised and explore contextualisation in-depth;
- Age, generation and other divisions among audiences require more research;
- Children and young people need to be included in future research “provided that research recognizes the differences in expectations and experiences across the stages of childhood, and indeed between children and young people”;
- And finally, research needs understand the multi-platform media environment that advertising is now a part of.

Hargrave and Livingstone (2005) also recommended that the impact of advertising on emotions should receive more attention than it has to date, with most research focusing on attitudes and behaviours despite the fact that they saw a series of findings of “people being made upset, fearful or anxious by the media” throughout existing research.<sup>54</sup> This fits with previous research by the ASA highlighting differences between emotional and rational offence.

All of these considerations are useful for the design of this project, and will help shape how we approach these important but complex issues with the public, parents and children.

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<sup>53</sup> Bailey, *Letting Children be Children* (June 2011), p.76

<sup>54</sup> Hargrave and Livingstone, *Harm and Offence in Media Content: A review of the evidence* (2006)