

Normalisation

How CAP and BCAP understand and respond to concerns about normalisation

Foreword

The Committee of Advertising Practice (CAP) is the self-regulatory body that creates, revises and enforces the [UK Code of Non-broadcast Advertising and Direct & Promotional Marketing](#) (the CAP Code). The CAP Code covers marketing communications across all non-broadcast media including on marketers' own websites.

The Broadcast Committee of Advertising Practice (BCAP) is the regulatory body responsible for maintaining the [UK Code of Broadcast Advertising](#) (the BCAP Code) under agreement with the [Office of Communications](#) (Ofcom).

The BCAP Code regulates all advertisements on television channels and radio stations licensed by Ofcom and all advertisements on Sianel Pedwar Cymru (S4C) and S4C digital, including teleshopping channels and any additional television service (including television text services and interactive television services).

These Advertising Codes (Codes) are enforced by the Advertising Standards Authority (ASA) which investigates complaints and publishes [rulings](#) on complaints about individual ads each week in addition to conducting proactive work in relation to particular regulatory issues.

Background

Largely as a result of the consultations we publish on topics such as gambling and alcohol, CAP and BCAP will sometimes receive comments raising concerns that advertising is ‘normalising’ a particular product or associated behaviour. Sometimes this will be explicitly noted, although it may instead be worded more broadly or contain calls for ‘denormalisation’. For instance:

From [BCAP payday loans consultation evaluation of responses](#) “Normalisation of HCSTC [High-Cost Short-Term Credit] is problematic and is an issue for BCAP as opposed to the FCA. BCAP’s trivialisation guidance is not enough to prevent the normalisation of HCSTC.”

From [CAP HFSS and children consultation response summary](#) “The respondent said exposure should therefore be limited and as much as possible done to denormalise unhealthy food.”

From [CAP and BCAP gambling consultation summary of responses](#) “It is almost impossible to promote gambling in a “socially responsible” way because ads aim to encourage people to gamble and to gamble more”

In light of the potential for this term and related expressions to be used in a variety of ways and, therefore, misunderstood, this document outlines what CAP and BCAP understand by it and how we view normalisation in relation to advertising of the types of products that stakeholders more commonly comment on.

There are some ads that, under the BCAP Code, attract scheduling restrictions based on the audience of the programme, and under the CAP Code attract other media-relevant restrictions to limit appropriately children’s exposure; henceforth referred to as ‘age-restricted ads/products’. Ads may be age-restricted because of the nature of the product being advertised e.g. ads for alcohol and gambling or ads for foods high in fat, salt or sugar (HFSS). Concerns about normalisation are almost exclusively raised in relation to age-restricted products. Many such products carry statutory age-restrictions on purchasing, which reflects a higher risk-profile as a consumer product and the potential for vulnerable groups to use them in a way that may cause physical or social harm. They may (such as in the case of HFSS foods) be perceived as contributing to a broader social concern, even where the product is not inherently high-risk and does not carry an age restriction on purchasing. For some products, particularly alcohol and gambling, their careful treatment under the Codes reflects the fact that some groups may have moral or sociological concerns that go beyond concrete effects on health or wellbeing. CAP and BCAP acknowledge that these products attract sensitivities beyond most others, and that particular care must be taken over policy positions that relate to them.

Normalisation may also relate to wider societal traits, such as the acceptance of gay relationships or transgender identities. These themes, or allusions to them, may sometimes appear in advertising and the ASA occasionally receives complaints that such content normalises human attributes that some complainants find objectionable.

Usually, these are complaints about ads which depict or imply homosexuality because a complainant believes that depictions of homosexuality in themselves are offensive. This paper deals only with the normalisation of products and related behaviours, rather than these types of social characteristics. However, the ASA will not uphold if a complainant finds an ad offensive purely for depicting (e.g.) homosexuality. Concerns might also be raised about the negative normalisation of social harms, such as overly thin body-types being presented as particularly desirable. Such broader concerns are not sector-based and are usually dealt with as part of the ASA's routine casework or through dedicated projects¹; they are not covered in this paper, which focuses on concerns about whole product categories.

Defining normalisation

Broadly, CAP and BCAP understand 'normalisation' to refer to the process by which a product, service, or behaviour becomes an unremarkable feature² of everyday life in current UK society. Normalised products and services are those which are commonplace in terms of existence and availability on the market, although not necessarily with regard to frequency of use or take-up by consumers (e.g. electric vehicles). Normalised behaviours are those which are not necessarily undertaken by the majority of people, but are not generally considered unusual (e.g. vegetarianism).

Many sociological studies concerned with normalisation (such as the one cited above) deal with increasing use of illicit products, such as recreational drugs, or clearly unsustainable behaviours, such as serious problem gambling. Use of the word 'normalisation' often, therefore, conveys negative connotations and carries the context of respondents' concerns about the potential sociological effects of a product, implying similarities between (for example) alcohol and illicit drugs. As noted above, we acknowledge the strength of feeling that age-restricted products, while legal, may engender for a number of reasons. As made clear below, when CAP and BCAP consider normalisation we do so in the context of products that are legally available and responsibly used; while our definition is derived in part from studies of illegal or problematic practices, this distinction must be kept in mind.

How CAP and BCAP consider normalisation of product types

The broad concern raised is often that advertising normalises (i.e., makes unremarkable) take-up of a particular product category, such as alcohol or e-cigarettes. We acknowledge that, for some stakeholders and consumers, the very fact of common use of some products is a subject of controversy. For instance, some groups may be of the view that alcohol should not be an unremarkable part of life, whether for moral or health reasons, and that there is no practical difference between binge-drinking and

¹ For instance, CAP advice on [body image](#) and recent consultation on [gender stereotyping](#)

² <https://www.tandfonline.com/doi/pdf/10.3109/09687637.2016.1173649?needAccess=true>

regular moderate consumption. Others may view all forms of gambling as inherently problematic, even when practiced infrequently and with restraint. Nonetheless, such products and services are legitimately and legally available, and have no statutory restrictions on their general promotion. CAP and BCAP acknowledge the place of these products as legitimate and legally-available, widely regarded as capable of being used responsibly. As such, the normalisation of such products and services does not present a policy concern. Preventing or reversing the normalisation of such products is therefore not a policy objective for CAP and BCAP.

What some stakeholders draw on, and what CAP and BCAP will consider, is the normalisation of *irresponsible use* of age restricted or other products with the potential for problematic use. This may include problem gambling, binge drinking, or unsustainable use of high-cost short-term credit (payday loans). For the avoidance of doubt, this is separate from the general use and existence of these products, as explored above. To prevent advertising from normalising such behaviour, CAP and BCAP have strict content rules for age-restricted products; for example (from the non-broadcast Code):

[Ads for gambling must not] portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm, or [...] suggest that gambling can be a solution to financial concerns, an alternative to employment or a way to achieve financial security

Drinking alcohol must not be portrayed as a challenge. Marketing communications must neither show, imply, encourage or refer to aggression or unruly, irresponsible or anti-social behaviour nor link alcohol with brave, tough or daring people or behaviour.

Marketing communications must neither link alcohol with seduction, sexual activity or sexual success nor imply that alcohol can enhance attractiveness.

Marketing communications [for electronic cigarettes] must contain nothing which promotes the use of a tobacco product or shows the use of a tobacco product in a positive light. This rule is not intended to prevent cigarette-like products being shown.

Marketing communications must not condone or encourage poor nutritional habits or an unhealthy lifestyle in children.

The ASA regularly investigates and rules on the content of age-restricted ads. For example, an online video for Beer52 Ltd was ruled to have breached a number of the alcohol content rules, including linking alcohol with sexual success and giving undue emphasis to the alcohol strength of specific drinks.³ An ad for 888 UK Ltd was ruled

³ <https://www.asa.org.uk/rulings/beer52-ltd-a17-378777.html>

against for suggesting that gambling could be an escape from depression and a solution to financial problems.⁴

CAP and BCAP consider that the existing content rules for advertising, as well as the general principles that ads should not cause harm or be socially irresponsible, are sufficient to address concerns about the normalisation of problematic use of commonly available products. However, where evidence exists to suggest that potentially irresponsible use is being promulgated through advertising, CAP and BCAP will assess it in line with our [published approach](#) to evidence-based policy making.

⁴ <https://www.asa.org.uk/rulings/888-uk-ltd-a17-392622.html>

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