

Your name	2. Do you agree with the wording of the proposed new CAP and BCAP rules? If not please include suggestions for how the proposed rules could be improved to achieve the aims set out in this consultation.	Please include your suggestions.
PI17	No	please see below
PI18	No	Often advertisers/marketeers can breach the rules if something shown is &quot;in good humour&quot;. This has been the case with oversexualised adverts, or those showing nudity, often involving men. The Muller Light yoghurt adverts are a classic example of this. The code should be altered to specifically state that humour should not be used to bypass the Code. Another example was an aftershave advert which showed a man stripping naked, whilst being 'perved' at by women, but was found not to be in breach due to the 'humour' aspect. If the gender roles were reversed, it would not have even been aired!
PI19	No	Advertisements must not include gender stereotypes that are likely to cause harm, or serious or widespread offence., or that perpetuate gender discrimination.
SW	Yes	.
BTHA	Yes	Yes, the rulings seem reasonable. For industry, guidance to support the ruling is important to help translate this into practice. We think it might be useful to highlight the ASA's six categories of gender stereotypes (defined by CAP) as a reference point in relation to the ruling (maybe in the guidance if not to be covered in the finalised ruling overview/info).
PI21	No	do not force types of gender on people use normal terms and respect normal behavior

PI22	Yes	n/a
PI24	Yes	I agreed'
PI26	Yes	I welcome the fact there are any changes at all but I feel they could go further in terms of protection of children against gender-specific advertising as it has a far more profound effect on children.
PI27	Yes	Fine
PI28	Yes	I agree
PI31	No	I'm broadly happy with the wording of the rule, but I would like to see stronger wording in the guiding principles to a) tackle the fact that the vast majority of the stereotyping in ads aimed at children is implicit rather than explicit, and b) accept the harm caused by the repetition of narrow gender stereotypes across multiple ads. In particular stop showing girls being weak and more inclusion of mixed groups of children playing together, Kia st as they do in real life.
PI32	Yes	None

PI33	No	I'd like to see this go further. I suggest adding: ...but care should be taken to avoid implicitly excluding boys or girls by only using such colours, language etc, or by including only girls or boys in a group of more than 3 or 4 children, without good reason.
MCL	No	Advertisements must not include gender stereotypes that are likely to re-enforce gender based interests and activities as these are likely to cause long term harm to children's goals and aspirations.
PI35	No	I think it could be stronger, resourcing for ads targeting children.
PI37	Yes	Agree
PI38	Yes	I feel we need stronger guidance around children in particular, especially where gender-based marketing is less explicitly set out. So called 'traditional' colours and activities that code female/male are absorbed by children without being explicitly stated and this, as well as explicitly sexist advertising, has to be stopped.
PI39	Yes	Happy with wording
PI40	Yes	No suggestions
PI41	No	I do agree but I would also suggest there is some wording included to cover representation of transgender roles - I couldn't see that was covered in this guidance?

PI42	No	I think the wording is ok, but really it needs to go further to make it completely clear that adverts should have a gender balance. So much gendered advertising is implicit not just explicit and this is a great opportunity to include that in this new guidance. Packaging desperately needs the same treatment - do you include that too?!
PI44	Yes	
PI45	Yes	I agree with the proposed wording
PI46	No	The wording is great for tackling explicit stereotyping, but needs strengthening with regards to implicit stereotyping. Implicit gender stereotyping should also be included as when repeated across multiple formats, still result in the message that certain genders can't do certain things. Suggested rewording: "Ads can be targeted at and feature a specific gender but should take care not to explicitly convey [addition]or strongly imply [addition] that a particular children's product, pursuit, activity, including choice of play or career, is inappropriate for one or another gender." First supporting example: "Ads shouldn't explicitly depict members of a specific gender being excluded from or dismissive of an activity. This doesn't prevent an ad from depicting children undertaking an activity stereotypically associated with their gender, using colours, language, music or settings which are also stereotypically associated with that gender.[addition] but care should be taken to avoid implicitly excluding boys or girls by only using such colours, language etc, or by including only girls or boys in a group of more than 3 or 4 children, without good reason." The second supporting example, reworded: "An ad that seeks to emphasise the contrast between a boy's stereotypical personality (e.g. daring) with a girl's stereotypical personality (e.g. caring) is likely to be problematic. Contrasting stereotypical characteristics in a way that reinforces perceptions of what children can or cannot be, because of their gender, is more likely to be problematic.

PI47	Yes	I am happy with the proposed wording.
PI48	Yes	Yes, I whole heartily agree with the proposal. As a parent of two young children I have been dismayed and very concerned at the constant and relentless stereotyping in adverts, particularly at those aimed at children. Research after research shows that stereotyping of both genders is having a negative impact on mental health and limiting life choices. People should be treated as people. Please bring forward this helpful and much needed rule to remind advertisers to be creative and not lazy. Their power to influence is immense!
PI50	Yes	Yes please word this as strongly as possible. Companies want to sell their products and they don't seem to care how they do this. So the guidance you give needs to be clear and strong.
PI20	No	I think the wording needs to be changed to include implicit as well as explicit suggestions that a particular toy is appropriate for one or other gender. There is never true - no toy should be marketed to girls or boys in particular. Therefore any ad which shows a toy being played with by only girls or only boys is creating gender stereotypes. I think gender-based targeting needs to go altogether.
PI55	Yes	simple and clear is best but with good guidance
PI57	No	It could be stronger, not just commenting on explicit differentiation between gender but also the implicit messages sent by gender roles in adverts.

PI58	Yes	None
NEU	Yes	Please see attached document below
PI59	No	This is an important move but I think it doesn't go far enough. It will take out the worst adverts but will not encourage advertisers to look hard at their practice over a wide range of adverts. One quick win would be to say that adverts should not show single-sex groups (3 or more) of young children playing with any toy. That would do a lot to break down the harmful assumption that there are &quot;boys' toys&quot; and &quot;girls' toys&quot; and would be simple to implement. I would also recommend saying that adverts should not &quot;strongly imply&quot; that any toy or children's activity is inappropriate for one sex.
PI60	No	.
BE	No	The new wording needs to be more specific in terms of leading advertisers towards a more diverse future regarding body image. &quot;Advertisements must portray diverse body image&quot;.
SLL	Yes	Included in attached file.
PI63	Yes	The wording is along the right lines but does not go far enough and advertisers will find loopholes. It needs to go further about implicit and cumulative messages - watch any ad break to see what I mean.

LTBT	Yes	No improvements, we are happy with the proposed wording.
ZT	No	<p>be affected or covered by the new guidance and therefore could continue. For example, the continual stereotypical portrayal of women as domestic with primary responsibility for childcare and domestic duties is a cumulative process of messaging across many advertisements. Similarly, the portrayal of men as strong, in leadership positions and powerful, is continuous and runs through multiple advertisements. Taken together, this stereotyping creates a landscape and culture with the very real potential to cause harm through the promotion of inequality. Additionally, it is harmful to the wellbeing of people of all genders who do not fit into gendered expectations. We are concerned the draft guidance does not take into account the cumulative impact of gender stereotyping in advertising as it still allows for individual adverts to use stereotypes. Any action taken which fails to place individual adverts within a wider context of gender inequality within advertising and the media will have a limited impact. While we are pleased that the new rule acknowledges the harm caused by gender stereotyping, we are concerned that the guidance only refers to 'some' or 'certain kinds' of gender stereotyping as being harmful. All gender stereotyping is harmful, and we would challenge the ASA to identify a form of gender stereotyping that does not cause harm. We would like to see the guidance remove all references to 'some' or 'certain kinds' of stereotypes being harmful. We would urge the ASA to take a clearer stance, like the Scottish Government, by explicitly connecting gender stereotypes and VAWG. Zero Tolerance would like to see the guidance take a much stronger stance on gender stereotyping in advertisements aimed at children. In 2015, we undertook a survey of over 1,300 Scottish parents on gender stereotyping in the early years to find out about parents' perceptions of how and where gender stereotyping influenced their children. We asked parents where they saw gender stereotypes occurring most frequently: 60% of parents responded that their children see gender stereotyping occurring most frequently in children's TV and media. The main issue is TV and if there was any way to lobby commercial TV to be more responsible about the advertising then this would have a huge impact. You can't stop your kids watching TV (well I can't) but adverts are completely backwards in terms of gender equality." Respondent to parents' survey, 2015 Additionally, studies have found that watching three to four hours of television a day can make children more likely to believe that others think boys are better than girls. It is therefore important that advertisements aimed at children not only avoid perpetuating harmful gender stereotypes but also provide examples of people doing the opposite of gender stereotypes, i.e. boys being nurturing and caring, girls being active and assertive. Under point 8, the guidance states that, "Ads shouldn't explicitly depict members of a specific gender being excluded from or dismissive of an activity. This doesn't prevent an ad from depicting children undertaking an activity stereotypically associated with their gender, using colours, language, music or settings which are also stereotypically associated with that gender." Unfortunately, in the highly gender segregated culture we live in, using certain colours and settings will act as a barrier for children when viewing these adverts. These limits placed on children and perpetuated through advertising will hinder them from engaging in the activities and play they want to. We would like to see the guidance emphasise the importance of countering gender stereotypes as well as simply avoiding them. We would also like to see the wording of section 9 strengthened by changing, "An ad that seeks to emphasise the contrast between a boy's stereotypical personality (e.g. daring) with a girl's stereotypical personality (e.g. caring) needs to be handled with care. Explicit labelling of children that contrasts stereotypical characteristics in a way that reinforces perceptions of what children can or cannot be, because of their gender, is more likely to be problematic." to, "An ad that seeks to emphasise the contrast between a boy's stereotypical personality (e.g. daring) with a girl's stereotypical personality (e.g. caring) reinforces perceptions of what children can or cannot be, because of their gender, is more likely to be problematic." Zero Tolerance urges to ASA to take a stronger stance on representations of idealised bodies. The new proposed guidelines currently read, "Ads may feature idealised body shapes and physical features stereotypically associated with women (e.g. a small waist) and men (e.g. an abdominal 'six pack')". This wording suggests that advertisers can continue to prescribe what a "good" and "attractive" body is. The new guidance does not address the fact that these standards are often sexist, racist and ableist nor does it acknowledge the fact that unhealthy beauty standards are disproportionately forced on women and that this is harmful gender stereotyping. We would like to draw the ASA's attention to the possibility that advertisers may deliberately create sexist and racist adverts in order to generate controversy and thus additional coverage. Multiple think pieces have been published regarding this concerning possibility (recent notable examples include adverts by Bic, Dove, H&amp;M and Heineken). The premise that all publicity, even negative publicity, is desirable to certain advertising campaigns is especially convincing in cases of campaigns in which women or people of colour are not the target audience. This issue relates directly to how the ASA decides to respond to companies who do not comply with the new rule. We suggest that companies do not receive any form of publicity for breaking this rule and instead lose media space. This approach would mitigate the likelihood of advertisers deliberately breaking the rule in order to receive additional, free publicity. Recommendations regarding specific wording: 1. We are pleased that in the section titled, "Key factors guiding the ASA's assessment", the ASA recognises that jokes at the expense of a gender stereotype are not acceptable. Humour is often used as an excuse for abhorrent views that should be dismissed along with that defence. However, if depictions are "unacceptable", we would question why the response cannot be stronger than "unlikely to be mitigated". We advise that this wording is changed to 'Unacceptable depictions will not be mitigated by the use of humour or banter.' 2. We support the ASA's position stated in the section titled, 'Key factors guiding the ASA's assessment' that it will be likely to consider stereotypes from the perspective of the group of individuals being stereotyped. However, we question why the ASA is only 'likely' to consider such an important perspective. We would instead suggest that the ASA always considers stereotypes from the</p>

PI65	Yes	n/a
EVAW+	No	Any stereotype is likely to cause harm, so a better rule would be not to use them at all and to challenge them as ethical best practice. Please refer to other questions for examples of how these rules and guidance could be strengthened.

GG	Yes	See attached document
IPA	No	See attached document
RC	Yes	