

COMPLAINT NUMBER	20/485
ADVERTISER	Unilever Australasia
ADVERTISEMENT	Dove, Television
DATE OF MEETING	10 November 2020
OUTCOME	Not Upheld No further action required

Summary of the Complaints Board Decision

The Complaints Board did not uphold six complaints about a television advertisement for Dove which promotes its Self-Esteem Project. The Board said the advertisement was not likely to cause harm and did not undermine the health and wellbeing of individuals. The Board said while the advertisement is confronting, it reflects the sorts of concerns girls experience and offers an online resource to help address these concerns.

Advertisement

The 30 second “Ella” television advertisement for Dove which promotes its Self-esteem Project shows a girl from the waist up standing facing the viewer. The camera then zooms out to show the girl, from the mid-thigh upwards, as the following internet search questions appear on screen: “Am I fat?”, “Can teens get cosmetic surgery?”, and “Do boys like a thigh gap?” The following text then appears: “What is your daughter searching for?” A voiceover says: “The Dove Self-Esteem Project teaches girls how to find greater self-esteem. Join us to help reach 32,000 Kiwi kids to achieve their potential.” The advertisement ends with the text “Visit www.dove.com/nz”.

Summary of the Complaints

There were six complaints about this advertisement. The Complainants were concerned the advertisement was sexist, introduced “sexual worries” by referring to the concept of the “thigh gap” and was insensitive towards people with eating disorders, particularly girls.

Issues Raised:

- Social Responsibility
- Decency and Offensiveness
- Health and well-being

Summary of the Advertiser’s Response

The Advertiser defended the advertisement and said the Self-esteem Project aims to raise awareness about the self-esteem issues faced by adolescent girls in New Zealand. The Advertiser acknowledged the advertisement was “confronting” and said Unilever, the owner of the Dove brand, commissioned research to identify the types of questions that young girls frequently ask online. The questions posed in the advertisement reflect the reality currently experienced by girls and they are an attempt to raise awareness of this in the wider community.

Relevant ASA Codes of Practice

The Chair directed the Complaints Board to consider the complaint with reference to the following codes:

ADVERTISING STANDARDS CODE

Principle 1: Social Responsibility: Advertisements must be prepared and placed with a due sense of social responsibility to consumers and to society.

Rule 1(c) Decency and Offensiveness: Advertisements must not contain anything that is indecent, or exploitative, or degrading, or likely to cause harm, or serious or widespread offence, or give rise to hostility, contempt, abuse or ridicule.

Rule 1(h) Health and well-being: Advertisements must not undermine the health and well-being of individuals.

Relevant precedent decisions

In considering this complaint the Complaints Board referred to three precedent decisions, Decision 15/489 and Decision 20/177 which were Not Upheld and Decision 17/295, which was No Grounds to Proceed.

The full versions of these decisions can be found on the ASA website:

<https://www.asa.co.nz/decisions/>

Decision 15/489 concerned a television advertisement for Ezibuy which showed a woman dancing around on screen, modelling various outfits. The Complainant was concerned the model being used was “stick thin, has no breasts and very skinny legs” and the use of such a thin model was a serious concern in the context of young women suffering from anorexia.

The Complaints Board said the woman had a healthy figure and while it appreciated the concerns of the Complainant relating to a positive body image, it said the woman in the advertisement did not appear anorexic. The Complaints Board said the advertisement did not promote unhealthy or unrealistic female archetypes.

Decision 17/295 concerned a previous version of a television advertisement for Dove’s Self Esteem Project. In it a girl is shown looking at the viewer. She is wearing a short sleeved top and is shown from the waist up. Across the screen some online search questions appear: "Can teens get cosmetic surgery" and "Am I ugly?". Next, the question "What is your daughter searching for?" is shown on the screen. The advertisement ends with the Dove Self Esteem Project logo and the voice-over "Lets help girls find greater self esteem."

The Chair of the Complaints Board ruled that the advertisement did not provide an unrealistic sense of body image or promote an unhealthy lifestyle and had observed a high standard of social responsibility.

Decision 20/177 concerned a Department of Internal Affairs television advertisement which promoted its campaign 'Keep It Real Online' which suggests ways parents can engage with their children about online pornography. The advertisement shows two naked people visiting a house because a young person had accessed their pornographic content online. The pair tell the mother about the devices he watches them on and that they normally perform for adults. They are concerned because their performance does not talk about consent or reflect how they would normally act. The mother calls her son to the door and he is surprised to see the couple at the door. The mother says, “It’s time to have a talk about what you see online versus real life relationships.” The advertisement ends with the line "Many young kiwis are

using porn to learn about sex, keep it real online" followed by a web address for viewers to visit and the New Zealand Government logo.

The Complaints Board said the execution and placement of the advertisement was justifiable on educational grounds to address the fact that many young people are using pornography to learn about sex. The advertisement played during PGR programming or news programming. The OnDemand placement was to subscribers 18+ years of age.

Complaints Board Discussion

Consumer Takeout

The Complaints Board agreed the likely consumer takeout of the advertisement was: many girls are seeking answers to their questions about body image and appearance. The Dove Self-Esteem Project supports young people. By supporting Dove, and by buying their products, you are also helping girls to build their self-esteem.

Audience

The Complaints Board noted the advertisement was targeting parents and guardians with the question "What is your daughter searching for?" The Board noted the Dove Self-Esteem Project is a key component of the Dove brand and referred to the following comment by the Advertiser: "The Campaign was created to help inform parents and guardians about the self-esteem issues facing young girls and the fact that many girls are seeking advice from the internet on those issues."

The Complaints Board noted the advertisement has a 'G' general classification which means it can be broadcast at any time.

Is the advertisement likely to cause harm and does it undermine the health and wellbeing of individuals?

A majority of the Complaints Board said the advertisement was not likely to cause harm and did not undermine the health and wellbeing of individuals. The majority said while the advertisement is confronting, it reflects the sorts of concerns girls experience and offers an online resource to help address these concerns. The majority said while the model in the advertisement is slim, she did not appear to be an unhealthy weight.

A minority disagreed. The minority said the advertisement is confronting and addresses sensitive issues which need to be carefully handled, especially with younger audiences.

The minority said the advertisement was not really appropriate for younger girls, who don't have the same filter when watching advertisements, and messaging about weight and body image could potentially be misconstrued. The minority questioned whether young girls would know what a "thigh gap" is and whether it was appropriate for them to learn about this concept from a television advertisement. The minority noted that while the message in the advertisement was appropriate for adults there were risks with screening the advertisement when a younger audience could view it, and more care should have been taken to avoid this. The minority referred to a precedent decision, 20/177, about an advertisement in the Keep it Real Online campaign. The minority said this advertisement had been given a PGR (Parental Guidance Recommended) rating by the Commercial Approvals Bureau and was played during PGR programming or news programming.

The minority compared the advertisement to a similar advertisement considered by the ASA, in Decision 17/295. The minority said that advertisement was less confronting and sexualised because it did not include the question "Do boys like a thigh gap?".

Was the advertisement prepared and placed with a due sense of social responsibility?

A majority of the Complaints Board said the advertisement was prepared and placed with a due sense of social responsibility taking into account context, medium, audience and product and was not in breach of Principle 1, Rule 1(c) or Rule 1(h) of the Advertising Standards Code.

A minority disagreed. The minority said the advertisement was not prepared and placed with a due sense of social responsibility taking into account context, medium, audience and product and was in breach of Principle 1, Rule 1(c) or Rule 1(h) of the Advertising Standards Code.

Outcome

In accordance with the majority the Complaints Board ruled the complaints were **Not Upheld**.

No further action required.

APPEAL INFORMATION

According to the procedures of the Advertising Standards Complaints Board, all decisions are able to be appealed by any party to the complaint. Information on our Appeal process is on our website www.asa.co.nz. Appeals must be made in writing via email or letter within 14 calendar days of receipt of this decision.

APPENDICES

1. Complaints
 2. Response from Advertiser
 3. Response from Media
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Appendix 1

COMPLAINT 1

Dove NZ is using a video of a thin teenager to advocate for more teen friendly body image concepts.

The video sets a completely contradictory ideal of teenage girl body shape. it will increase body dysmorphia in teens.

COMPLAINT 2

While watching The Bachelor Australia on Bravo, we were shocked by the Dove advertisement featuring an underweight girl asking three inappropriate questions about weight. The ad is offensive towards adolescent girls and confronting and upsetting about weight loss. Please remove it. It is inappropriate.

COMPLAINT 3

I find the advertisement offensive because the part where it lists worries young girls might have suggests things for them to worry about and includes sexual worries while picturing a young girl/child.

Pushing forward worries about thigh gaps as though they should be concerned that anyone would even notice their bodies demeans all children and women. But putting up a list of worries that many child viewers may have never even thought about is appalling also. Just to sell Dove products under the guise of doing good. This advertisement should be removed immediately to decrease the number of children who pick up this appalling and damaging message.

COMPLAINT 4

I found the Dove soap ad horrific and inappropriate as I was watching Bondi Rescue at 7.25 pm with my granddaughters. The reason is because of the skinniest of the girl in the ad and the wording - "Am I fat.?"

I feel this could led to a eating disorder as the ad also makes the suggestion to "make internet searches".

It is also insensitive towards people, particularly girls, with eating disorders and their parents. I hope this advertisement will be removed quickly.

COMPLAINT 5

This ad is aimed at females worried about their appearance and mentions 'thigh gap'. How stupid, this is putting the idea of thigh gap into not only young women's minds but young men as, well. My daughter is 18 and didn't know what a thigh gap was.... She has also been diagnosed with an eating disorder in her past. Not good enough, very disappointed.

COMPLAINT 6

Very sexist ad showing skinny girl asking if 'boys like a thigh gap?'

Worst ad ever by Dove.

On prime time tv.

Get it off.

Will try and get screen shot.

Appendix 2

RESPONSE FROM ADVERTISER, UNILEVER

Dove Self-Esteem Project Campaign Complaint Reference No. 20/485

I refer to your letter dated 21 October 2020.

1. The Complaints

The ASA has received the following complaints about a confronting Dove Self-Esteem Project video that is currently being broadcast online and via television:

- (a) *“Dove NZ is using a video of a thin teenager to advocate for more teen friendly body image concepts. The video sets a completely contradictory ideal of teenage girl body shape. it will increase body dysmorphia in teens.”*
- (b) *“While watching The Bachelor Australia on Bravo, we were shocked by the Dove advertisement featuring an underweight girl asking three inappropriate questions about weight. The ad is offensive towards adolescent girls and confronting and upsetting about weight loss. Please remove it. It is inappropriate.”*
- (c) *“I find the advertisement offensive because the part where it lists worries young girls might have suggests things for them to worry about and includes sexual worries while picturing a young girl/child. Pushing forward worries about thigh gaps as though they should be concerned that anyone would even notice their bodies demeans all children and women. But putting up a list of worries that many child viewers may have never even thought about is appalling also. Just to sell Dove products under the guise of doing good. This advertisement should be removed immediately to decrease the number of children who pick up this appalling and damaging message.”*
- (d) *“I found the Dove soap ad horrific and inappropriate as I was watching Bondi Rescue at 7.25 pm with my granddaughters. The reason is because of the skinniest of the girl in the ad and the wording - "Am I fat.?" I feel this could led to a eating disorder as the ad also makes the suggestion to "make internet searches". It is also insensitive towards people, particularly girls, with eating disorders and their parents. I hope this advertisement will be removed quickly.”*
- (e) *“This ad is aimed at females worried about their appearance and mentions 'thigh gap'. How stupid, this is putting the idea of thigh gap into not only young women's minds but young men as, well. My daughter is 18 and didn't know what a thigh gap was.... She has also been diagnosed with an eating disorder in her past. Not good enough, very disappointed.”*
- (f) *“Very sexist ad showing skinny girl asking if 'boys like a thigh gap?' Worst ad ever by Dove. On prime time tv. Get it off. Will try and get screen shot.”*

The Complaints relate to the “Ella” Video described below.

2. The Dove “Searching” Campaign

Unilever recently launched its Dove “Searching” campaign (**Campaign**) to raise awareness of, and promote, the Dove Self-Esteem Project in New Zealand.

The Campaign consists of two videos:

- (a) “Ella” Video (30 seconds); and
- (b) “Mai” Video (15 seconds).

Copies of the videos are enclosed with this letter.

The “Ella” Video is booked to be broadcast on television until late November 2020 and the “Mai” Video is booked to be broadcast digitally until early December 2020.

The Campaign aims to raise awareness about the self-esteem issues faced by adolescent girls in New Zealand.

Dove is on a mission to create a world where beauty is a source of confidence, not anxiety. Dove is committed to ensuring the next generation of women grow up with a positive relationship with the way they look – helping them raise their self-esteem and realise their full potential.

In 2004, Dove turned this commitment into the Dove Self-Esteem Project. Together with leading experts from fields including psychology, health, and body image, Dove created a programme of world-class resources to help develop and increase body confidence and self-esteem in young people. Since 2004, the Dove Self-Esteem Project has reached 62 million young people globally.

Recognising the increasingly adverse impact that the internet and social media are having on self-esteem, Unilever commissioned research to identify and understand the types of questions that young girls frequently ask online.

The research showed an alarming number of girls were searching for answers to self-esteem related issues such as:

- (a) “*Can teens get cosmetic surgery?*”;
- (b) “*Am I fat?*”;
- (c) “*Am I too skinny?*”;
- (d) “*Am I ugly?*”;
- (e) “*Do I have an eating disorder?*”;
- (f) “*Do boys like a thigh gap?*”.

As a result, Dove developed the Campaign to raise awareness of the need for more self-esteem education, both at school and at home

The Campaign was created to help inform parents and guardians about the self-esteem issues facing young girls and the fact that many girls are seeking advice from the internet on those issues.

The Campaign is confronting because it depicts the real questions that young girls are asking the internet. Our hope is that the Campaign and the Dove Self-Esteem Project will empower and equip parents and guardians in New Zealand with the tools to help young girls overcome their self-esteem issues.

3. The Code

Dove is committed to helping the next generation of women develop a positive relationship with the way they look, helping them raise their self-esteem and realise their full potential.

The “Ella” Video, which is the subject of the Complaints, reveals that young girls are searching for a number of alarming things online, many of which are related to low self-esteem.

While it is confronting and shocking to see the results of our research, and to hear that young girls are searching online for “*can teens get cosmetic surgery*” and “*do boys like a thigh gap*”, Unilever respectfully submits that bringing this issue to the attention of parents, guardians, family, friends, teachers and the community as a whole is not contrary to the Advertising Standards Code (**Code**).

Rule 1(c)

Unilever does not believe the Campaign contains anything that is indecent, exploitative, or degrading or likely to cause harm, or serious or widespread offence.

We acknowledge the message conveyed by the Campaign is saddening and confronting, but that message reflects the reality of what young girls are searching for online. Unilever believes it is critical to raise awareness about this issue for parents, guardians, family, friends, teachers and the community as a whole.

Rule 1(h)

Unilever does not believe the Campaign undermines the health and well-being of individuals.

Rather, Unilever respectfully submits the Campaign raises awareness about this alarming issue and helps persons identify and rectify the mental and physical health issues of young girls affected by body confidence and other issues.

4. Determination by ASB: Complaints Dismissed

The Advertising Standard Board (**ASB**) received similar complaints about the Australian version of the “Ella” Video. The ASB dismissed the complaints, providing the following reasons:

The Board noted the advertiser’s response that this advertisement is part of a campaign to raise awareness about self-esteem issues faced by young girls and the questions shown in the advertisement are based on research which shows that these are the questions young girls are searching online for answers to.

The Board noted the complainants’ concerns that it is offensive to put the idea of girls having a thigh gap to please boys in an advertisement but considered that the advertisement is not promoting this idea but rather is raising awareness that some girls do wonder about issues such as this and their questions need to be addressed.

The Board noted that the advertisement provides information about a place online that young women can go to to ask such questions. The Board noted the advertisement had been rated ‘W’ by CAD and so would be seen by a broad audience which would include children but considered that those children who could understand the questions being posed in the advertisement would likely be aware of these issues themselves.

The Board considered that the advertisement did not depict material contrary to Prevailing Community Standards on health and safety around body image. The Board determined that the advertisement did not breach Section 2.6 of the Code. Finding that the advertisement did not breach the Code on other grounds, the Board dismissed the complaints.

A link to the ASB's determination follows:

<https://adstandards.com.au/sites/default/files/reports/0364-16.pdf>

5. Conclusion

While the Campaign is confronting, Unilever believes it complies with the Code.

Appendix 3

RESPONSE FROM MEDIA, COMMERCIAL APPROVALS BUREAU

Complaint 20/485 Unilever Australasia Key number 30DOVESENZ Classification G

This Dove commercial was approved by CAB on 25/09/20 with a 'G' general classification and is categorised as a toiletries advertisement.

The commercial promotes the Dove Global Self-Esteem Project, a global education initiative for children and teenagers.

Organisations that have partnered with the Dove Global Self-Esteem Project include:
Girl Guiding New Zealand - Free Being Me Programme

<https://girlguidingnz.org.nz/about-us/programmes/free-being-me/>

School Kit - My Self Confidence Kit

<https://www.schoolkit.co.nz/my-self-confidence-classroom-kit>

Life Education Trust - Dove Self Esteem Project

<https://www.lifeeducation.org.nz/in-schools/resources/610?>

Youthline Charitable Trust - Body talk

<https://www.youthline.co.nz/body-talk.html>

Each of these organisations are committed to providing education and guidance to young and particularly vulnerable New Zealanders. Their reputation and services are tributes to their communities, and their partnership with the Dove Global Self-Esteem Project speaks to the quality and purpose of Dove as a partner in youth education.

A sample of viewers may have missed the message that the questions asked in the advertisement are representative of real-life teen issues, and that the resources provided by Dove help to address self-esteem in a meaningful manner.

Girl Guiding, Life Education Trust and Youthline have a long history of care for New Zealand youth, and if they support Dove Global Self-Esteem Project then CAB takes on good faith that this advertisement meets with a high standard of social responsibility.