

COMPLAINT NUMBER	21/128
ADVERTISER	Mothers Matter
ADVERTISEMENT	Who Holds Our Mothers, Television, Digital Marketing
DATE OF MEETING	23 March 2021
OUTCOME	Upheld in Part Advertisement to be removed and not used again in its current form

Summary of the Complaints Board Decision

The Complaints Board Upheld thirteen complaints about the Mothers Matter television and digital marketing advocacy advertisement which showed a woman's journey through domestic abuse and motherhood that ended in suicide. The Complaints Board said the classification and placement of the advertisement were inappropriate given the confronting subject matter and the depiction of a method of suicide. The Complaints Board also said the lack of a warning message and support information for those who could be triggered by the content meant the advertisement had not been prepared and placed with due sense of social responsibility.

Advertisement

The Mothers Matters three minute television, Facebook and YouTube advertisement titled *Who Holds Our Mothers* begins with the statistic that "New Zealand's maternal suicide rate is 5 times higher per capita than the U.K. and 7 times higher per capita in our at-risk communities." It tells the story of a woman's experience of domestic abuse, discovery she is pregnant and being abandoned by her partner. It shows she does not have the support of her father, who has alcohol issues. The advertisement next shows the woman trying to cope with a new-born baby, shouting at the child and displaying signs of self-harm. The woman's father is unable to make contact with her, so breaks into her house finding the baby abandoned and a note saying, "I'm sorry." The woman is seen standing on the edge of a cliff with the following scene being her funeral. The father is seen tipping away his alcohol and protesting with a "Mothers Matter" placard. The advertisement ends with the text "We approached the Government for help. They turned us away. Raise the Red Flag. Make them listen. www.mothersmatter.nz"

Summary of the Complaints

There were thirteen complaints about this advertisement. The Complainants were concerned the advertisement:

- Was triggering for vulnerable people with graphic use of alcohol, self harm, suicide, emotional abuse, child neglect
- Had inappropriate placement at times when children would be watching, and should be shown after the 8:30pm watershed
- Breached broadcasting recommendations about suicide by showing the method of suicide and not including warning or support information
- Portrayed suicide as having a positive outcome
- Stigmatised a certain ethnicity

Issues Raised:

- Advocacy Advertising
- Social Responsibility
- Offensiveness
- Fear and Distress

Summary of the Advertiser/Agency Response

The Advertiser supplied a statement of intent confirming the advertisement is to advocate for policy changes to address the lack of support for mothers and parents with regard to family healthcare and wrap around services to support the critical period of the first thousand days of a new family unit.

The Advertiser/Agency defended the advertisement and said planning the campaign included obtaining classification and approval from the Commercial Approvals Bureau (CAB) and television networks. Following the first night screening the 180 second advertisement, TVNZ added a warning notification and support information either side of the advertisement and adjusted its placement. To date Prime, TV3 and Choice stations have not requested any warning.

Summary of the Media Response

The Commercial Approvals Bureau confirmed the advertisement had been given a GXC rating (General Except Children) rating which means that it cannot be broadcast during children's programming. It said the advocacy advertisement was justified in causing a degree of distress given the seriousness of the subject matter. It said there is no requirement for a trigger warning in the ASA or Ministry of Health's guidelines or codes. The story in the advertisement is fictitious and the theme of the advertisement is clear from the opening graphics and early scenes and viewers have 1 minute 40 seconds to turn off before the first tangible suggestion of self-harm.

Relevant ASA Codes of Practice

The Chair directed the Complaints Board to consider the complaints 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(g) Fear and distress: Advertisements must not cause fear or distress without justification.

Principle 2: Truthful Presentation: Advertisements must be truthful, balanced and not misleading.

Rule 2(e) Advocacy advertising: Advocacy advertising must clearly state the identity and position of the advertiser. Opinion in support of the advertiser's position must be clearly distinguishable from factual information. Factual information must be able to be substantiated.

Relevant precedent decisions

In considering these complaints the Complaints Board referred to two precedent decisions, Decision 20/045 and 09/389, both of which were Not Upheld.

The full versions of decisions from 2015 can be found on the ASA website:

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

Decision 20/045 concerned an advocacy television advertisement for Spend My Super which used a metaphor of a factory production line with babies being rejected to illustrate a statistic about child poverty. The advertisement was also a call to action to donate superannuation funds to child poverty causes. The Complaints Board ruled the complaints were Not Upheld because despite the imagery being confronting to some consumers, it did not meet the threshold to breach the Advertising Standards Code.

Decision 09/389 concerned an advocacy advertisement television advertisement for the New Zealand Transport Agency and New Zealand Police. The advertisement showed a drunk driver crashing the car. The passenger's dead body is shown sitting next to the driver and then falls onto him. The majority of the Complaints Board said the advertisement needed to be hard-hitting to show the target audience the consequences of drink driving. The majority of the Complaints Board said the advertising S9 rating meant it could only be broadcast after 9pm and meant the advertisement was socially responsible.

Complaints Board Discussion

The Chair noted that the Complaints Board's role was to consider whether there had been a breach of the Advertising Standards Code. In deciding whether the Code has been breached the Complaints Board has regard to all relevant matters including:

- Generally prevailing community standards
- Previous decisions
- The consumer takeout of the advertisement, and
- The context, medium, audience and the product or service being advertised.

Consumer Takeout

The Complaints Board agreed the likely consumer takeout of the advertisement was it portrayed a confronting and serious story of a mother in a disadvantaged situation dealing with alcohol abuse, domestic violence and abandonment which led to her suicide. It also included a call to action to invest more in maternal health services in New Zealand and challenged the Government's funding policy in this area.

Does the advertisement fit the definition of advocacy advertising?

The Complaints Board said the advertisement before it fell into the category of advocacy advertising and noted the requirements of Rule 2(e) of the Advertising Standards Code. This Rule required the identity of the advertiser to be clear; opinion to be distinguished from factual information and factual information must be able to be substantiated. The Advocacy Principles developed by the Complaints Board in previous decisions considered under Rule 11 of the Code of Ethics remain relevant. They say:

1. That section 14 of the Bill of Rights Act 1990, in granting the right of freedom of expression, allows advertisers to impart information and opinions but that in exercising that right what was factual information and what was opinion, should be clearly distinguishable.

2. That the right of freedom of expression as stated in section 14 is not absolute as there could be an infringement of other people's rights. Care should be taken to ensure that this does not occur.
3. That the Codes fetter the rights granted by section 14 to ensure there is fair play between all parties on controversial issues. Therefore, in advocacy advertising and particularly on political matters the spirit of the Code is more important than technical breaches. People have the right to express their views and this right should not be unduly or unreasonably restricted by Rules.
4. That robust debate in a democratic society is to be encouraged by the media and advertisers and that the Codes should be interpreted liberally to ensure fair play by the contestants.
5. That it is essential in all advocacy advertisements that the identity of the advertiser is clear.

Role of the ASA when considering an advocacy advertisement.

The Complaints Board noted its role is to consider the likely consumer takeout of an advertisement and complaints about advocacy advertising are considered differently to complaints about advertising for products and services.

The Complaints Board observed that in a free and democratic society, issues should be openly debated without undue hindrance or interference from authorities such as the Complaints Board, and in no way should political parties, politicians, lobby groups or advocates be unnecessarily fettered by a technical or unduly strict interpretation of the rules and regulations.

Under Rule 2(e) Advocacy advertising of the Advertising Standards Code:

- The identity of the advertiser must be clear.
- Opinion must be clearly distinguishable from factual information, and
- Factual information must be able to be substantiated.

If the identity and position of the Advertiser is clear, a more liberal interpretation of the Advertising Standards Code is allowed.

Is the identity and position of the Advertiser clear?

The Complaints Board said that, on balance, the identity of the Advertiser was sufficient for the advertisement to be considered as advocacy advertising. The Board took into account the "Mothers Matter presents" credit 26 seconds into the advertisement and the call-to-action messages and website details, www.mothersmatter.nz, at the end of the advertisement which consumers could access for more information.

The Complaints Board agreed it was important Advertisers do not assume consumers will be aware of the Advertiser's position and said some viewers may not understand that Mothers Matter was a lobby group calling for action from the government. The Board said some viewers may see the phrase "Mothers Matter" as a statement of fact. While the statistics shown at the start of the advertisement provided a level of framing for viewers, additional references to the organisation and its website would have been helpful.

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

Classification/Placement

The Complaints Board unanimously agreed the rating given to the advertisement by the Commercial Approvals Bureau was not appropriate. The Complaints Board noted the

advertisement had been given a GXC rating (General Except Children), which meant the advertisement could be broadcast at any time except during children's programming. The Complaints Board confirmed the Advertiser had placed the advertisement in accordance with its rating – obtained through the required approvals process.

The Board said a GXC rating allowed for placement in a wide range of programming and had increased the risk of children and young people being part of the audience exposed to the confronting imagery in the advertisement. The Complaints Board said this risk could have been mitigated by restricting placement to adult viewing time.

The Complaints Board noted the Advertiser and TVNZ rescheduled some of the placement to avoid programming which may have a younger audience but at the time of receiving the Advertiser's response this had not been applied across all television platforms.

The Complaints Board unanimously ruled the placement of the advertisement was not socially responsible and was in breach of Principle 1 of the Advertising Standards Code.

Does the advertisement contain anything that is likely to cause harm?

The Complaints Board unanimously agreed that irrespective of the rating and placement of the advertisement, the confronting content could act as a trigger for vulnerable viewers of any age and was likely to cause harm to some consumers.

The Board acknowledged the importance of the issue the Mothers Matter advertisement raised. It noted an advocacy message lobbying for support for mothers and babies dealing with mental, emotional and physical health issues such as domestic violence and alcohol abuse in the perinatal and postnatal period was likely to be hard-hitting. However, it said the way the narrative is depicted in the advertisement meant warning and support messages should have been included.

The Complaints Board also noted that following the first screening date, TVNZ had bookended the advertisement with a trigger warning about the content and support contact details. The Board confirmed that at the time of receiving the Advertiser's response to the complaints, this had not been instigated across all television platforms.

The Complaints Board noted the advertisement had been viewed by some Complainants on the Facebook and YouTube platforms. The Board said an equivalent level of warning and support messages should be employed in order to minimise potential harm to those viewing the advertisement via digital marketing channels.

The Complaints Board ruled the advertisement was in breach of Rule 1(c) of the Advertising Standards Code.

Does the advertisement contain anything that is likely to cause offence?

The Complaints Board considered the complaint that said the advertisement is stigmatising in terms of ethnicity, behaviour and circumstances of people depicted in the video.

The Board accepted the advertisement showed one example of a mother at-risk. It said, in the context of advocacy advertising, this aspect of the advertisement did not meet the threshold to breach the Advertising Standards Code.

Does the advertisement cause fear or distress without justification?

The majority of the Complaints Board said the subject matter was confronting but this was justified when viewed through the lens of advocacy advertising. The majority of the Complaints Board said the advertisement was not in breach of Rule 1(g) of the Advertising Standards Code.

A minority of the Complaints Board disagreed and said the story's narrative could have been told without a reference to the method of suicide. The minority of the Board were also concerned that the ending of the advertisement could be interpreted as suicide was a viable option with some positive outcomes – in this case, the changed behaviour of the woman's father, the action to march to support other vulnerable people, and the attendance at her funeral by her abusive partner. The minority were concerned the impression created of the father and abusive partner's redemption could send the wrong message. The minority said the advertisement had the potential to cause distress without justification.

However, in accordance with the majority, the Complaints Board said the advertisement was not in breach of Rule 1(g) of the Advertising Standards Code.

In Summary

The Complaints Board said the placement and content of the advertisement was not socially responsible, taking into account context, medium, audience and product and ruled the advertisement was in breach of Principle 1 and Rule 1(c) of the Advertising Standards Code.

The Complaints Board said the advertisement was not in breach of Principle 2 or Rules 1(g) and 2(e) of the Advertising Standards Code

Outcome

The Complaints Board ruled the complaints were **Upheld in Part**.

Advertisement to be removed and not used again in its current form.

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

COMPLAINT 1

Graphic use of alcohol, self harm, suicide, emotional abuse and child neglect. Extremely inappropriate especially with no warnings or filters to limit exposure to children or those at risk.

COMPLAINT 2

Distressing content, including suicide, alcohol use, fighting, domestic violence, breaking into a house, a mother screaming at her new-born baby. My two daughters aged 10 and 6 were watching Millionaire Hotseat, and were upset at this very long and distressing advertisement. I came in just after the ad started and did not see any warning. Interestingly on their website there is a warning for distressing content displayed on the thumbnail for this ad. This should not be played before the 8:30pm watershed, and it is quite common for children to be watching TV at this time as it is a G rated tv show. The advertiser and the network need to rectify this.

COMPLAINT 3

The new ad for the mothers matter nz campaign needed a trigger warning for abuse, neglect and most importantly suicide. It was also a horrible time with children at home who should not be subjected to such scenes. As someone who has lost her best friend and brother to suicide I was shocked and deeply saddened to see this on tv in the early hours of the morning with no warning. With a trigger warning we have a chance to change the channel. I'm not asking for the ad to be pulled just a warning before it begins and for it not to play during hours when children would be home.

COMPLAINT 4

Ad can be seen here: <https://youtu.be/O03ltJa-hys>. I believe it to be unsafe for mothers suffering post-natal distress. It shows the lead up to and after-effects of suicide. It presents the after effects as bringing families together, curing alcoholism and inspiring community change. This could be enough to persuade a depressed woman that suicide is a good option. It certainly would have done that for me 22 years ago when I was suffering from PND. Suicide almost never brings healing and change and should not be portrayed that way.

COMPLAINT 5

The advertisement depicts a violent and traumatic family situation which eventuates in the suicide of the main character. I feel this was inappropriate for screening to an audience and should have been accompanied by a graphic content warning or mental health support messaging. I feel it has breached the following ASA Codes: Principal 1 - Social Responsibility Rule 1 (c) Decency and Offensiveness Rule 1 (g) Fear and distress

COMPLAINT 6

Advertisement contained visuals and messages implying serious domestic abuse, self harm and suicide. I understand this is an advertisement for an organisation that helps mothers deal with post-natal depression but there are ways to convey a message that don't include showing self harm cuts in an advertisement. As a young person that has had issues with that in the past I believe it is irresponsible for the channel to be broadcasting this graphic and potentially triggering content for a means of advertisement

COMPLAINT 7

I wish to complain about the content and screening of this video. It breaches broadcasting recommendations about suicide. It is unsafe for several reasons:

- i. there are no helpline or crisis phone numbers
- ii. it is potentially triggering for vulnerable individuals
- iii. it shows suicide methods. I have had multiple complaints from concerned individuals, mothers, health service providers, suicide prevention co-ordinators and others in the last three days.

COMPLAINT 8

The video can be found on Facebook and YouTube: <https://www.youtube.com/watch?v=O03ltJa-hys>

- i. The video is unsafe because it deals with suicide but includes no helpline or crisis line numbers.
- ii. The video is distressing. There are multiple reports on the Mothers Matter facebook page that people found it powerful and made them cry.
- iii. The video may trigger vulnerable people in the community to attempt suicide. We already have reports that it has done so, and that additional support has had to be arranged for these distressed individuals.
- iv. It shows suicide methods, which is a breach of the suicide reporting guidelines.
- v. It is potentially stigmatizing in terms of the ethnicity of the principal subjects.

COMPLAINT 9

- i. The video promoted by Mother's Matter, Who Will Hold the Mother's, is unsafe because it deals with suicide but includes no helpline or crisis line numbers.
- ii. The video is distressing. There are multiple reports on the Mothers Matter facebook page that people found it powerful and made them cry.
- iii. The video may trigger vulnerable people in the community to attempt suicide. We already have reports that it has done so, and that additional support has had to be arranged for these distressed individuals.
- iv. It shows suicide methods, which is a breach of the suicide reporting guidelines.
- v. It is potentially stigmatizing in terms of the ethnicity of the principal subjects

COMPLAINT 10

The video is unsafe because it deals with suicide but includes no helpline or crisis line numbers. The video is distressing. There are multiple reports on the Mothers Matter facebook page and in the YouTube comments that people found it powerful, triggering and they felt upset. The video may trigger vulnerable people in the community to attempt suicide. We already have reports that it has done so, and that additional support has had to be arranged for these distressed individuals. It shows suicide methods, which is a breach of the suicide reporting guidelines. It is potentially stigmatizing in terms of the ethnicity of the principal subjects

COMPLAINT 11

How is this even slightly acceptable???? All men commit Domestic violence meets all mums unable to go through motherhood before killing themselves? I'm a pretty easy going viewer... but someone is going to get heat from green lighting this. Absurd

COMPLAINT 12

Mothers Matter - ad on prime I think last night. I would like to make complaint about this ad it could be very destructive for vulnerable people and mothers watching it and I ask that it be changed or taken down. I totally agree that mothers need more support all the way through their journey 100% and I truly hope this support is increased over the next few years so mothers have much better outcomes. But I felt this ad was too much and could be very destructive for a mother who sees it especially someone feeling vulnerable. I would ask that you take down those graphic scenes or take it down completely and replace it with an ad that comforts and supports a mother who feels vulnerable and does not make her feel more

hopeless. You could have used that ad time to highlight the problems with facts and stats and then shown what a good journey through motherhood looks like to mothers, the community and government where they had good support and then asked that this be properly organised and funded by government. This would have been far more empowering to mothers feeling vulnerable at the time and given them hope and strength. You could have also listed some contact numbers mother's could call if they needed help. There are lots of organisations out there to help. I think if a vulnerable mother watched this they could feel even worse and I would strongly encourage you to take it down. This ad could be very destructive for the people you are trying to help. Images and words are very powerful please be far more responsible delivering yours.

COMPLAINT 13

This is a link to the article with the video <https://www.nzherald.co.nz/nz/watch-harrowing-video-on-maternal-suicide-leaves-politicians-holding-back-tears/BWV22EH6ZHRACDY7A47NYTUVRM/> The video clearly depicts suicidal behaviours and the loss of a person by suicide but includes no helpline or crisis line numbers - this is unsafe. The video is highly distressing for many people, with multiple reports on the Mothers Matter Facebook page and on other parenting and news media websites that people found it extremely powerful, bringing them to tears. The video may trigger already vulnerable people in the community to attempt suicide. This risk is clearly known in the research literature, and it is playing out in this situation. Services already have reports of this happening, and that additional support has had to be arranged for highly distressed people. The video depicts suicide methods, which is a breach of the suicide reporting guidelines. The video deploys multiple stereotypes about brown people in New Zealand and is stigmatising in terms of the ethnicity, behaviour and circumstances of the people depicted in the video. This is totally unacceptable.

Appendix 2

RESPONSE FROM ADVERTISER, MOTHERS MATTER



STATEMENT OF INTENT: 'WHO HOLDS OUR MOTHERS' MARCH 2021

The film – Who Holds Our Mothers – was born out of a commitment to our nation's future success, out of passion, frustration, and an overwhelming desire to bring recognition to the failure successive governments have demonstrated in the withdrawal of basic humanitarian care for our mothers in Aotearoa, New Zealand. Only the government can create the policy changes that will provide the support for mothers and parents, they are the first teachers and role models to our children.

The consequence is failure of so many of our people to thrive and reach their potential in an outwardly egalitarian society. Our intention is to bring about policy change that reflects first world countries recognition that meaningful support in the critical period of the 'first thousand days' not only saves lives but is of utmost importance to the integrity of the family unit and the nation's economic future.

We have irrefutable scientific evidence that foetal brain development is impacted in the early stages and throughout pregnancy dependent on various stresses with the mother. We have evidence that the lack of health checks for mothers leads to perinatal and long term postnatal

mental health issues. Research, here and universally shows, simply put, well mother, well child.

We have countless narrative from the flax roots view of those who work within the wider circle of family health that without the wrap around services that are meaningful, culturally and specifically, failure to thrive within an entire family is predictable.

Lastly, we have consulted cross-culturally, with NGOs, Philanthropies, and groups who have attempted discourse that would lead to meaningful change but always it comes to nothing. The theme being, 'it takes time' as well as 'someone else makes the decision'. We say to government "time is up". Those at the top must be accountable.

Our health care system has gone backwards resulting in an escalating and generational downward spiral. It has been recognised that a 'circuit breaker' needed to be put forward, Who Holds Our Mothers has been recognised as just that.

This is a discussion that needs to be had within our communities and with transparency by the policy makers, the government. Only they can create policy change.

Chloe Wright

Founder of Mothers Matter

RESPONSE FROM AGENCY, BESPOKE MEDIA

When planning/developing this campaign, the initial concept TV creative script was presented to both CAB and the TV Channels for approval to produce and plan the campaign.

The Target Market for the campaign is All People 25-64, and all planned programming on the TV schedule was approved by the Networks before presenting to the Wright Family Foundation to approve and book.

All media activity other than Facebook and YouTube is summarised on the attached Media Overview. Also attached the 180sec confirmed TV Campaign for your reference.

The Facebook/YouTube has been run by the Wright Family Foundation.

The Mother's Matter campaign, initially commenced on TV with their 45sec TVC, from their the 180sec message commenced supported by the Online/Newspaper and Billboard activity.

- TV Key Number: WFFMM/45/01, Rating G
- TV Key Number: MMM_180_001, Rating GXC
- Target Market: All People 25-64
- Research: Nielsen

All material attached and links below of both the 45sec and 180sec TVC material.

45sec TVC: <https://www.youtube.com/watch?v=S8uHmRZsPIs>

180sec TVC: <https://www.youtube.com/watch?v=S8uHmRZsPIs>

Wright Family Foundation material below running on Facebook and YouTube:

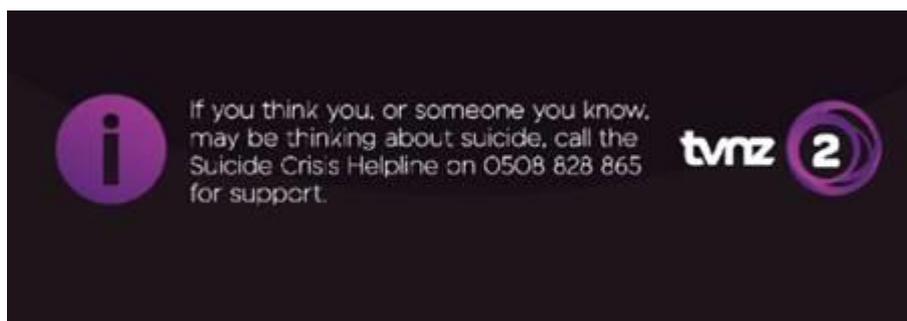
<https://youtu.be/O03ltJa-hys>

<https://www.youtube.com/watch?v=S8uHmRZsPIs>

<https://www.facebook.com/mothersmatternz/videos/446839786368599>

Once the 180 sec campaign commenced on Thursday 11/3, TVNZ late on Friday 12/3, requested that an opening and closing billboard run with the 180sec TVC , this was produced by TVNZ and included on all 180sec activity starting Saturday 12/3. In addition, TVNZ requested that we amend the TV buy taking out the next booked Breakfast Tue 23/3 at 08:20 and TV1 Sat 27/3 10:20 John & Lisa's Kitchen spot to replace these spots with Sunday 21/3 Prodigal Son running at 21:30, this was actioned.

For your reference, the opening and closing billboards running on the 180sec with TVNZ:



To date we have had no request from Three/Prime or Choice to include a warning billboard on the 180sec TVC.

Please find above a letter from Chloe Wright regarding the campaign's imperatives for change.

Appendix 3

RESPONSE FROM MEDIA, COMMERCIAL APPROVALS BUREAU

Mother's Matter Television Advertisement – Complaint 21/128

Key number: MMM 180 001; Classification: General Except Children (GXC)

Thank you for the opportunity to comment on the complaints that the above commercial is in breach of the Advertising Standards Code.

The 3-minute Mothers Matter advertisement uses a fictitious portrayal of a young mother's suicide to highlight what they believe to be New Zealand's broken system of maternal care.

Our understanding of the complaints is that the storytelling in this advertisement is distressing which, at worse, could harm the vulnerable people Mothers Matter seeks to help. The identity of the advertiser is clearly stated and none of the complaints are in relation to the two factual statements presented at the start of the commercial.

The commercial was approved with a GXC (General Except Children) rating which means that it cannot be broadcast during children's programming.

Rule 1(g) of the Advertising Standards Code states that "advertisements must not cause fear or distress *without justification*" (emphasis added). The guidelines for advocacy advertising make an allowance for the advertiser to express their views in "robust terms".

In our view the seriousness of the subject matter justifies causing a degree of distress. Indeed, it is hard to imagine being able to discuss maternal suicide without causing distress. Similarly, it is our view that the advertiser should be given the latitude to advocate for changes to the system of maternal care in the most robust terms permissible.

Several complainants suggested that it would be more socially responsible for a 'trigger' warning to appear before the airing of the commercial as is required for television programmes and the reporting of suicide.

We note that there is no requirement for 'trigger' warning in either the ASA or Ministry of Health's guidelines or codes. It is worth restating that the story in this advertisement is fictitious – it appears to be realistic because the story is well told and plays to our collective expectations of the reality for some unfortunate souls.

That said, we believe it is clear from the opening graphics and first few scenes what this commercial is about. The audience knows what is coming, indeed this knowledge is what makes the commercial so compelling, and there is plenty of time (1 minute 40 seconds) to turn off the television before the first tangible suggestion of self-harm.

In our view the advertisement has been prepared and placed with a due sense of social responsibility. It is undeniably 'robust' and can be distressing to watch but this is surely justified by the seriousness of the issue.