

Seeing is Believing

A national framework for championing gender equality in advertising



she=qual
ADVERTISING EQUALITY

 **Women's Health**
VICTORIA





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The Hon. Gabrielle Williams MP

Every woman has the right to be treated equally, with dignity and respect, in the workplace, at home, and in the community.

We know that media and advertising have a direct impact on the experience of women and girls, as powerful sources of culture. These industries have a significant influence on social norms, attitudes and understandings of gender. Unfortunately, women are still disproportionately more likely to be sexualised and objectified in the media, which has a detrimental impact on women's health and wellbeing and perpetuates gender inequality. We also know that sexism in the media contributes to the attitudes and behaviours that drive violence against women and this further compounds issues of gender inequality in our society.

But, media also has the power to drive change. Positive and diverse portrayals of women can be culturally transformative. And research has shown that rejecting sexist tropes in favour of realistic and respectful representations of gender makes good business sense for advertisers and their clients.

With the right guidance, media and advertising can create appropriate community attitudes and behaviours that support gender equality and prevent family violence and all forms of violence against women.

Both government and industry have a role to play in ensuring representations of women in the media and advertising are fair, equal, and do not perpetuate harmful stereotypes.

This is why the Andrews Labor Government funded Women's Health Victoria to lead the Gender Equality in Advertising Project, the first coordinated effort in Australia to promote gender equality and address the drivers of violence within the advertising setting. The first phase of this project has successfully created a solid foundation of research to build upon.



This strategic framework is our next step forward, transforming evidence into action. The framework will engage industry, business, regulators, academics and community members to build support for action to end sexism in the media and in advertising. Because, we know that effective attitudinal and behavioural change requires sustained investment, research, regulation and active engagement, to achieve lasting reforms.

This strategic framework is a step closer to developing comprehensive, evidence-based strategies to address sexist advertising. I would like to congratulate Women's Health Victoria on their efforts to produce this important framework, which forms a foundation for policymakers, industry leaders and the public to make the changes necessary to end sexist advertising.

Hon Gabrielle Williams MP
Minister for Aboriginal Affairs
Minister for the Prevention
of Family Violence
Minister for Women



Women's Health Victoria Dianne Hill, CEO

Women's Health Victoria is proud to present *Seeing is believing: a national framework for championing gender equality in advertising*, Australia's first strategic framework to promote gender equality in advertising. The framework has been developed as part of a multi-year project led by Women's Health Victoria, in collaboration with advertising industry representatives and expert partners, and funded by the Victorian Government. This project represents the first coordinated effort in Australia to promote gender equality and address the drivers of violence against women in the advertising setting.

The framework recognises the immense power of advertising to influence our beliefs, values, attitudes and behaviours. In particular, it recognises the significant role advertising plays in shaping and reinforcing our ideas about what it means to be a woman or man and how women and men are valued in our society.

The framework is grounded in the growing evidence that stereotyped and sexualised representations of women in advertising undermine efforts to promote gender equality and prevent violence against women. It is based on extensive research into what works to promote gender equality in advertising in Australia and overseas, and draws on input from consultations with industry and other experts.

Women's Health Victoria has long recognised the importance of improving the representation of women in advertising and public space in efforts to advance gender equality, improve women's mental health and wellbeing, and prevent violence against women. This project and *Seeing is believing: a national framework for championing gender equality in advertising* build on that history, while expanding our reach and impact through collaboration with industry and community. We thank our project partners Our Watch, Respect Victoria, City of Melbourne, Dr Lauren Gurrieri (RMIT University), Bec Brideson and The Shannon



Company, as well as our industry reference group, for their expert contributions to this project.

Seeing is believing: a national framework for championing gender equality in advertising lays the foundations for future strategic action to promote gender equality in advertising. We all have a role to play. Women's Health Victoria invites everyone with an interest in responsible use of the power of advertising – including brands, creatives, governments, regulators, educators, activists and consumers – to get active in making the change we want to see.

We have a choice: advertising can perpetuate attitudes, beliefs and behaviours that promote sexism, gender inequality and violence against women, or it can play a positive role in transforming how women, men and gender diverse people are perceived and valued in Australian society and culture. Let's make the choice that supports women and girls to be healthy, empowered and equal.

Dianne Hill
Chief Executive Officer
Women's Health Victoria



Our Watch Patty Kinnersly, CEO

Violence against women is prevalent but not inevitable. The drivers of this violence are deeply entrenched across society through our structures, norms, practices and attitudes, and to prevent this violence we must undertake sustained work to progress gender equality. Change the story, the national shared framework for the primary prevention of violence against women, identifies that advertising is an important setting for this work. Advertising has the potential to contribute to the development of more positive social norms relating to gender and relationships across society, by avoiding harmful and stereotypical representations and through positive action to challenge and change gender inequalities (for example, by subverting traditional gender stereotypes). As many stakeholders have a role to play in this work, this strategic framework clearly sets out how the advertising industry, communities, and governments can create change. Different stakeholders have different responsibilities, expertise and capacities and different spheres of influence, and we can work in collaboration and partnership to ensure that our actions are mutually reinforcing. As a national organisation working to prevent violence against women, Our Watch commends Women's Health Victoria on *Seeing is believing: a national framework for championing gender equality in advertising*, which is an important contribution to progressing action on this issue.

Patty Kinnersly
CEO, Our Watch



Australian Association of National Advertisers (AANA) John Broome, CEO

As the peak body for marketers and brand owners in Australia, the Australian Association of National Advertisers (AANA) is pleased to engage with organisations like Women's Health Victoria, which seek to ensure gender equality is advanced in all areas of society, including the advertising industry. Not only does the Australian community have the right to expect positive gender portrayals from our advertising, it also makes strong commercial sense for advertisers and their businesses to do the right thing. The vast majority of brand purchase decisions are made by women and research shows us that purchase intent jumps dramatically when advertising they see portrays women equally, appropriately and respectfully. The overwhelming majority of advertisers already get this, but problematic portrayals still occur. So, in 2018, we issued new guidance notes to more accurately reflect evolving community expectations and help advertisers ensure that they don't reinforce negative gender stereotypes. Ad Standards, whose independent adjudicators are drawn from and are representative of the Australian community, will continue to assess complaints from the Australian public about discrimination, including on the basis of gender. The AANA is committed to ensuring that the advertising self-regulatory system continues to meet the community's expectations of gender portrayals whilst, at the same time, encouraging our industry to eradicate sexist behaviours and attitudes from the workplace.

John Broome
CEO, Australian Association
of National Advertisers



At a glance

In sexist ads, women are

- sexualised
- stereotyped
- shown with 'ideal' bodies
- objectified
- shown as victims of violence
- excluded
- vilified



Violence against women remains prevalent in Australian society

One in three women over 15 have experienced physical or sexual violence

Violence against women starts with gender inequality

Sexist ads fuel a culture of gender inequality that supports violence against women and girls

Gender equality presents a major market opportunity for advertisers.

Women make 70-80% of all purchase decisions.



Realistic portrayals of women in ads increase purchase intent by:

26% All consumers

45% Women

Our vision



Advertising that shows all people, regardless of gender, as authentic and multi-dimensional – supporting a society in which all people are viewed and treated as equal and live free from violence.

What needs to change

The advertising industry must change its practices to promote gender equality in both advertising content and workplaces

Communities must be empowered to take action against sexist advertising, and for portrayals of women in ads to be more varied and authentic

Governments and regulators must strengthen interventions to prevent sexist advertising and minimise its harmful impacts

What will be achieved

The advertising industry is more supportive of women, including greater gender balance across senior roles and more inclusive workplace practices

The community is proactive in calling out sexist advertising and demanding better representation of women

Strong regulatory frameworks support the industry to eliminate sexist advertising

Why gender equality

in

advertising matters

Why advertising matters

Advertising is powerful. It's a multi-billion-dollar industry¹ designed to change us.

And it's everywhere. You can't escape it. We see more than 5000 ads, on average, every day. Many of us see more than 500 before breakfast.²

Advertising tells us stories about who we are and who we could or should become – as individuals and as a society. Its job might be to sell us something (or to make us aware of something), but its impact is much greater.

What we expect from women and girls, and from men, boys and gender diverse people, is influenced by how they are shown in advertising.

As audiences, we don't always know it. But in advertising, we are seeing a picture of our culture. We use that picture when we form our ideas about what gender means for who we are and how we live.

Still too often, being a woman in an ad means being a sex object, a mum, a stereotype, a prop, or someone not able to think or choose for herself. Too often, being a man means being super-macho, aggressive, or powerful.³ Gender diverse people are largely invisible. Most ads still show people who are young, white, able-bodied and heterosexual.⁴

Sexist advertising contributes to a culture of violence against women. But better, more diverse and realistic representations of women and girls can help change that culture.

“ Advertising plays an important role in shaping culture. As advertisers we have a responsibility to ensure anything we publish is representative of the values and culture of an organisation. At NAB, we believe strongly in the power of diversity for building a more productive, more creative and more engaged workforce.

Ben Knighton – Head of Group Brand, NAB

¹ Free TV, 'The power of advertising: Free TV. Accessed: 8 December 2019. <https://www.freetv.com.au/what-we-do/power-of-tv-advertising/>

² Tunikova, O. 'How many ads do you actually see daily?' Accessed: 18 November 2019. <https://stopad.io/blog/ads-seen-daily>

³ McKenzie M, Bugden M, Webster A, Barr M. 'Advertising (in)equality: the impacts of sexist advertising on women's health and wellbeing'. Melbourne: Women's Health Victoria, 2018. (Women's Health Issues Paper; 14), 14, 15, 19.

⁴ McKenzie M, Bugden M, Webster A, Barr M. 'Advertising (in)equality: the impacts of sexist advertising on women's health and wellbeing'. Melbourne: Women's Health Victoria, 2018. (Women's Health Issues Paper; 14), 11.

Why changing advertising matters

When people use advertising's sexist and limited representations to understand gender, the ideas they are left with are, at best, limiting. At worst, they are dangerous.

Limited ideas about gender contribute to continuing inequality between women and men. It's this culture which creates the conditions in which men use violence against women.

Advertisers can help change this. Many already are – and they are seeing the benefits to their brands and bottom-lines as a result.⁵

Sales lift, and purchase intent and brand loyalty improve, for brands that show women as more equal, more multidimensional and more authentic.^{6 7 8}

The evidence for this comes from the advertising industry's own research and outcomes, both in Australia and overseas. It shows there is a strong business-case for change. While pockets of resistance remain, astute advertisers are beginning to take responsibility and action, proving it works.

Media and advertising are a crucial part of the social shift for gender equality and ending violence against women. Their influential role is identified in both *Change the Story*, Australia's national framework for the prevention of violence against women and their children, and *Safe and Strong: A Victorian Gender Equality Strategy*.



We need at least 50% women in creative departments and in creative leadership roles. It's the only way to ensure the stories we tell come from equal voices that represent the gender split in the real world. I would also love to see both women and men in our industry become more cognisant of the effects of inequality in advertising, and more educated about how we can change up our content to be more representative.

Sarah McGregor – Executive Creative Director, Comunicado

⁵ Silverstein, M & Sayre, K. 'The Female Economy'. 2009. *Harvard Business Review*. Accessed: 18 November 2019. <https://hbr.org/2009/09/the-female-economy>

⁶ BusinessWire. 'ANA SeeHer Expands Validation on Gender Equality in Ads with Sales Data from IRI Lift'. Accessed: 18 November 2019. <https://www.businesswire.com/news/home/20190616005063/en/ANA-SeeHer-Expands-Validation-Gender-Equality-Ads>



Those of us who work in advertising have a unique and valuable opportunity. If we show women in advertising in all their diversity, and tell authentic stories that engender respect for all women, we make women safer. What a powerful impact the industry can have on shifting culture, and more crucially, stopping violence against women.

Jo Stanley – Media presenter and gender equality advocate

Research shows advertising is changing too slowly

To move forward, our collective approach must recognise the ways in which gender inequality interacts with other forms of discrimination, including discrimination on the basis of sexuality, ethnicity, disability and socio-economic status. Advertising can play an important role in counteracting this discrimination and inequality by reflecting and representing the true diversity of women in our society.

The issue of gender needs a specific, sustained and prioritised focus because the harm from sticking with the status quo is proven to be too great.

People of all genders, our society, our economy, and advertisers themselves, all benefit from gender equality.

Advertising needs to change – significantly and quickly – to paint a better, more diverse, realistic and inspiring picture of being a girl and a woman. That is what this framework can achieve.

⁷ Association of National Advertisers. '#SeeHer: gender equality measure'. Accessed: 18 November 2019. <https://seeher.com/gender-equality-measure>

⁸ Burnett, S. 'Taking A Stand: How Brands Are Tackling Social Issues' *Forbes*. Accessed: 18 November 2019. <https://www.forbes.com/sites/forbesagencycouncil/2019/07/01/taking-a-stand-how-brands-are-tackling-social-issues/#2e165dc32e59>

The links between violence, gender equality and advertising

Violence against women starts with gender inequality⁹

International and national evidence shows that addressing gender inequality is the key to preventing violence against women.¹⁰

But in Australia women are still far from equal to men. Australia's ranking in the World Economic Forum's Global Gender Gap Index has slipped from a high of 15 in 2006 down to 39 in 2018.¹¹ The Gender Gap Index measures women's disadvantage compared to men in health, education, economy and politics to gauge the state of gender equality in 149 countries.

A culture of inequality diminishes the value of women and girls. Objectification, the 'glass ceiling', or gendered roles at home or work are all examples of this culture. They are part of the social norms, practices and structures that tell us women are worth "less than" men and create the conditions for men to abuse, harass or assault women.¹²



What is gender inequality?

Gender inequality is the unequal distribution of power, resources, opportunity, and value afforded to men and women in a society due to prevailing gendered norms and structures.¹³

Gender equality affords equal rights, responsibilities and opportunities to women, men, trans, gender diverse and intersex people. Equality does not mean that everyone will become the same, but that their rights, responsibilities and opportunities will not depend on their gender.¹⁴

⁹ Our Watch, Australia's National Research Organisation for Women's Safety (ANROWS) & VicHealth, 'Change the story: a shared framework for the primary prevention of violence against women and their children in Australia.' Melbourne: Our Watch, 2015, 23.

¹⁰ For example, the UN Sustainable Development Goal No. 5 Gender Equality recognises that achieving gender equality is foundational to ending violence against women. See <https://www.un.org/sustainabledevelopment/gender-equality/>; Our Watch et al, 'Change the Story'.

¹¹ World Economic Forum, 'The Global Gender Gap Report 2018'. 2018. *World Economic Forum*. Accessed: 18 November, 2019. http://www3.weforum.org/docs/WEF_GGGR_2018.pdf

¹² Make the Link. 'Educate yourself. Gippsland Women's Health'. Accessed: 8 December, 2019, <https://makethelink.org.au/make-the-link/educate-yourself/>

In Australia, one woman is killed every week by a partner or former partner.¹⁵ One in three women over 15 will experience physical or sexual violence.¹⁶

Women who experience other forms of disadvantage and discrimination also experience higher rates of violence.¹⁷ Women with a disability or major health problems are one third more likely to experience violence than those without.¹⁸ Indigenous women experience violence at about twice the rate of non-Indigenous women, and are 34 times more likely to be hospitalised due to family violence related assaults.¹⁹ Sexist advertising has a particularly negative impact on already marginalised groups.

Violence against women costs Australia an estimated \$22 billion per year. It has a bigger negative impact on the health of women under 45, than any other risk factor, including smoking, high cholesterol or illicit drugs.²⁰

A culture of equality can prevent violence against women before it starts.



¹³ Our Watch et al, 'Change the Story', 8

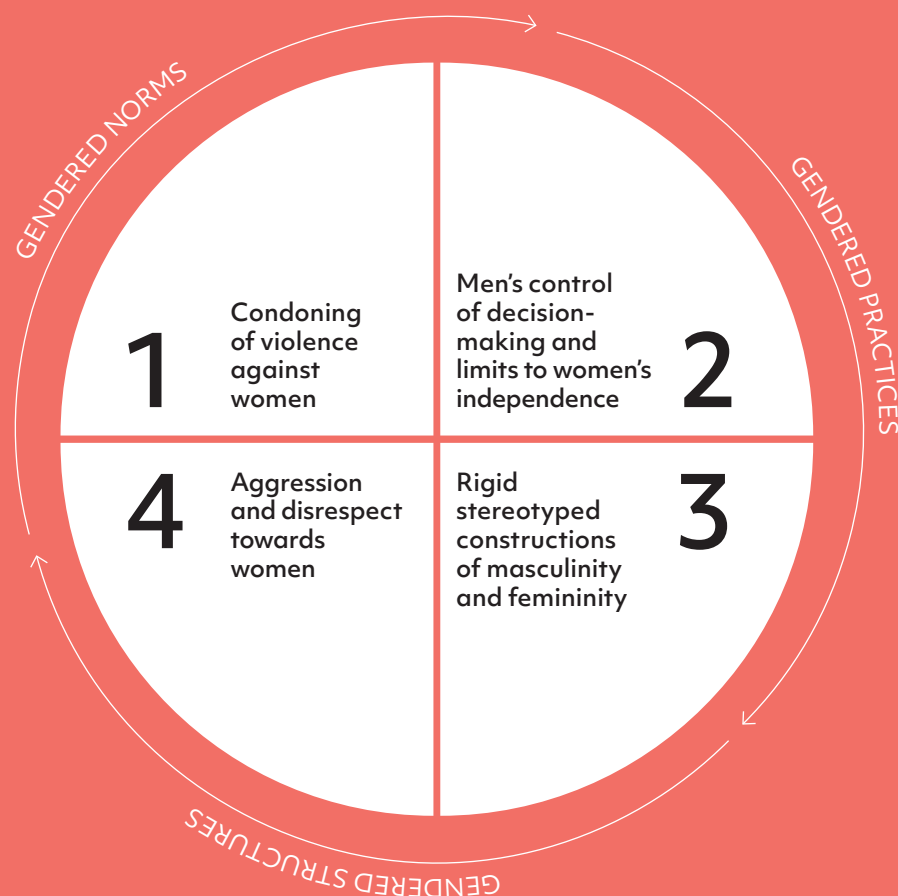
¹⁴ Department of Health and Human Services (Victoria). 'Free from Violence: First Action Plan 2018–21'. (Melbourne: Department of Health and Human Services, 2018). Accessed; 18 November, 2019. https://www.vic.gov.au/system/user_files/Documents/fv/1710039_Free%20from%20Violence%20First%20Action%20Plan%202018-2021%2016.pdf

^{15, 16} Australian Institute of Health and Welfare, 2019.

¹⁷ Our Watch et al, 'Change the Story', 12.

¹⁸ Our Watch. 'Facts and figures'. Accessed: 18 November 2019. <https://www.ourwatch.org.au/Understanding-Violence/Facts-and-figures>

Gender inequality creates the social context for the four gendered drivers of violence²¹



19 Steering Committee for the Review of Government Service Provision. 'Overcoming Indigenous disadvantage: Key indicators 2014'. 2014. Productivity Commission, Canberra. Accessed: 18 November 2019. <http://www.pc.gov.au/research/ongoing/overcoming-indigenous-disadvantage/key-indicators-2014/key-indicators-2014-report.pdf>

20 VicHealth. 'Violence against women in Australia: An overview of research and approaches to primary prevention'. 2017. Accessed: 18 November 2019. <https://www.vichealth.vic.gov.au/-/media/ResourceCentre/PublicationsandResources/PVAW/Violence-Against-Women-Research-Overview.pdf>

21 Our Watch et al, 'Change the Story', 23.

Advertising can contribute to a culture that enables violence or one that prevents it

Sexist advertising causes harm. Advertising that sexualises women, or that portrays idealised and unrealistic images of women's bodies, negatively affects women's physical and mental health. It can also cause both women and men to view women as less human, less competent and less moral.

Exposure to sexist advertising is linked to greater support for sexist beliefs and attitudes that blame victims for sexual violence.²² Condoning violence against women is one of the drivers of this violence.

Sexist advertising also harms men. Using stereotypes to engage men can promote dominant forms of masculinity that have been shown to contribute to violence and bullying.²³



What is sexist advertising?

Sexist advertising includes depictions of gender-based discrimination and vilification; use of gender roles and stereotypes; promotion of unrealistic and unhealthy body ideals; and representations of violence against women.²⁴

Gender equality in advertising shows women and men as diverse and equal. It reflects a diversity of ages, ethnicities, body shapes, sexualities, aspirations and roles. It avoids stereotypes, sexualisation and objectification. It does not show degradation or violence against women.

22 Gurrieri L, McKenzie M, Bugden M. 'Community responses to gender portrayals in advertising: a research paper'. (Melbourne: Women's Health Victoria, RMIT University, 2019) (Women's Health Issues Paper; 15)

23 <https://www.ourwatch.org.au/getmedia/47bd1d32-4099-4bbf-85d1-c09e5d982877/Men-in-focus-web.pdf.aspx>

24 Gurrieri L, Hoffman R. 'Addressing and preventing sexist advertising: an analysis of local and global promising practice'. (Melbourne: RMIT University, 2019)

25 Ward, L. M., & Aubrey, J. S. 'Watching gender: How stereotypes in movies and on TV impact kids' development'. 2017. Common Sense. Accessed: 18 November 2019. https://www.commonensemedia.org/sites/default/files/uploads/pdfs/2017_commonsense_watchinggender_fullreport_0620.pdf

Children are even more impressionable

What children see – including what they see in media and advertising – plays a role in shaping their aspirations, attitudes and behaviours.

Children as young as two learn gender stereotypes about activities, traits, toys, and skills.²⁵ Gendered depictions limit children's aspirations for who they can become from the age of six.

Advertising is everywhere

It's impossible to escape the influence of advertising. Its harmful impacts contribute to gender inequality in our society more broadly: to women having fewer opportunities – affecting education, income, careers, and caring responsibilities.

And it contributes to attitudes and behaviours that drive men's violence against women. It can also undermine good work to promote equality which is taking place in other areas – such as in school programs or through public behaviour change campaigns.

Advertising that shows women and girls as equal, avoids stereotypes and increases the representation of diversity has positive impacts – for our health, for our society, and for advertising effectiveness.²⁶



26 Our Watch et al, 'Change the Story'.

27 Silverstein, M & Sayre, K. 'The Female Economy'. 2009. *Harvard Business Review*. Accessed: 18 November 2019. <https://hbr.org/2009/09/the-female-economy>

28 BusinessWire. 'ANA SeeHer Expands Validation on Gender Equality in Ads with Sales Data from IRI Lift'. Accessed: 18 November 2019. <https://www.businesswire.com/news/home/20190616005063/en/ANA-SeeHer-Expands-Validation-Gender-Equality-Ads>

29 Association of National Advertisers. '#SeeHer: gender equality measure'. Accessed: 18 November 2019. <https://seeher.com/gender-equality-measure>

Why equality matters for business

Women are the world's most powerful consumers. While women are half the population, they make 70-80% of all purchasing decisions.²⁷ Because women often buy for their children, partner, parents, friends and businesses, their purchases can have a multiplier effect.

The advertising industry's own research shows sales are stronger when women are shown as more equal. A study by the US Association of National Advertisers (ANA), assessing 288 ads using a Gender Equality Measure (GEM), found that ads with the highest GEM scores had the highest sales lift.²⁸ International research has similarly found realistic portrayals of women in ads increased purchase intent by 26% among all consumers, and by 45% among women.²⁹

Brands who take a stand on gender equality experience better returns long-term, including increased customer engagement and brand loyalty.³⁰

The commercial successes of ad campaigns that show women of different ages, ethnicities and body shapes (e.g. Dove's "real body" campaign), that celebrate female leaders (e.g. Activa yoghurt's "It starts inside" campaign) and that speak out against violence (e.g. Tecata beer's "A Mexico without violence" campaign) have all created a band of loyal customers.

Consumers expect and know more about the brands they choose to engage with.

More than 83% of consumers want brands to take a stand on societal issues.³¹

The number one way that brands can do so is by living their purpose.³² This means reflecting gender equality in their leadership, workplace structures and culture, procurement, and marketing, as well as in their advertising.

30 Burnett, S. 'Taking A Stand: How Brands Are Tackling Social Issues' Forbes. Accessed: 18 November 2019. <https://www.forbes.com/sites/forbesagencycouncil/2019/07/01/taking-a-stand-how-brands-are-tackling-social-issues/#2e165dc32e59>

31 WE Communications. 'The New Brand Loyalty'. 2019. Accessed: 18 November 2019. <https://we-worldwide-arhxo0vh6d1oh9i0c.stack-pathdns.com/media/446450/brands-in-motion-2019-whitepaper.pdf>

32 Edelman. '2018 Edelman Earned Brand: Brands take a stand'. 2018. Accessed: 18 November 2019. https://www.edelman.com/sites/g/files/aatuss191/files/2018-10/2018_Edelman_Earned_Brand_Global_Report.pdf

The advertising industry explained

Advertisers, marketers, brand owners

The businesses and organisations that commission and pay for advertising, and set goals for what it must achieve. Often this is the role of marketing within commercial companies, and campaigners in not-for-profits or government.

Creative industry

The creators of the advertising seen on TV and radio, in print, on billboards, on the street or on digital. Agencies can be independent or part of national or international holding groups.

Market researchers

Research companies that test and validate the creative ideas. These can be commissioned by brand owners or creative agencies.

Media buyers

Companies that purchase space on media platforms for advertising to be displayed (to reach audiences and advertising goals).

Media owners

Organisations that own digital and physical spaces where ads are displayed (e.g. newspapers, billboards, trains, social media) or played (e.g. TV channels, Spotify, radio).

Industry regulators and associations

Industry regulators that issue guidelines (Australian Association of National Advertisers) and manage complaints (Ad Standards) about advertising.

Other bodies that bring together organisations to grow the industry or to advocate on its behalf.

Gender equality in advertising:

The way forward

The purpose of this framework

This framework outlines a national approach for change to improve how advertising represents women and girls.

Improving representation of women and girls in advertising will contribute to a society that values women as equals. As a result, men will be less likely to perpetrate violence.

“ There is a compelling and fundamental values case for empowering women: women represent one half of the global population—they deserve equal access to health, education, earning power and political representation.

World Economic Forum, 2015³³

The framework harnesses a growing momentum for change across the advertising industry, brands, the community, and government.

It is funded by the Victorian Government and led by Women's Health Victoria. It has been developed in close consultation with the advertising industry and its representative bodies.

It is one part of the Victorian Government's efforts to address violence against women following the Royal Commission into Family Violence, completed in 2016. The framework supports government strategies for the prevention of violence against women and promotion of gender equality.³⁴

³³ Schwab, K. 'Preface: Global Gender Gap Report 2015'. 2015. *World Economic Forum*. Accessed: 18 November 2019. <https://reports.weforum.org/global-gender-gap-report-2015/preface/>

³⁴ Department of Health and Human Services (Victoria). 'Free from Violence: First Action Plan 2018–21'. 2018. Accessed: 18 November, 2019. https://www.vic.gov.au/system/user_files/Documents/fv/1710039_Free%20from%20Violence%20First%20Action%20Plan%202018-2021%202016.pdf; State of Victoria (Department of Premier and Cabinet), 'Safe and strong: A Victorian Gender Equality Strategy: Preventing violence against women through gender equality', 2016. Accessed: 18 November 2019. <https://www.vic.gov.au/safe-and-strong-victorian-gender-equality>

A blueprint for a long-term, whole-of-system approach to change

The framework prioritises areas for action, to deliver greater gender equality in advertising through:

- Industry culture change
- Empowering communities
- Regulation and policy

These are interrelated, as advertising content is influenced by the culture of the industry that creates it, as well as by community norms, and by the regulatory and legislative environment the advertising industry operates in.

The framework sets out an approach to influence change in each of these areas over the long-term, starting now.

The specific initiatives and interventions recommended by the framework will be supported by rolling action plans, developed collaboratively with the relevant groups. Ongoing engagement is therefore critical to the framework's success.

Why industry

The advertising industry will play a critical role in realising this positive change.

While community norms or government interventions can help to support a move away from sexist advertising, change will happen faster, and at a deeper level, if the industry leads it. This framework provides direction for brands and agencies, who can show leadership by endorsing it and using it to guide actions. It also offers direction to industry bodies, such as the Australian Association of National Advertisers (AANA), and to educational institutions, advertising executives and marketing directors, whose leadership is critical to driving widespread change.

Why government

Regulation can have a role in limiting the behaviour of advertisers and providing legal recourse to complainants by setting and reflecting community standards for advertising.³⁶

In a self-regulatory environment, an industry body administers codes and standards for advertising. If change is not effectively driven by industry, there is a case for government intervention through co-regulation. Given some willingness from industry to act, it may be feasible to maintain self-regulation, subject to stronger enforcement mechanisms. If this does not create the required change, co-regulation by government delivered in collaboration with the sector may deliver the changes needed to improve gender equality in advertising.

Why community

Communities actively recognising and rejecting sexist advertising will drive change.

While people are concerned, research shows that many of us are desensitised to sexist advertising;³⁵ its ubiquity normalises it and makes it hard to see. Increased awareness of its harmful impacts may therefore motivate individuals and groups to act, as consumers (via complaints and direct engagement with advertisers, for example) or as citizens (via advocacy to government for regulatory and legislative reform). A change in how our community responds to sexist advertising may in turn influence political will and industry motivation to drive the required changes at both cultural and structural levels.

³⁵ Gurrieri et al. 'Community responses to gender portrayals in advertising: a research paper'.

³⁶ Gurrieri L, Hoffman R. 'Addressing and preventing sexist advertising: an analysis of local and global promising practice'. Melbourne: RMIT University, 2019.

A framework formed through research and engagement

The framework brings together contemporary research, case studies for change, and rich industry insights gathered through extensive stakeholder consultation.

Research

The framework is underpinned by the following research papers.

- *Advertising (in)equality: the impacts of sexist advertising on women's health and wellbeing*, McKenzie M, Bugden M, Webster A, Barr M (2018), Women's Health Victoria. Melbourne. (Women's Health Issues Paper; 14)
- *Community responses to gender portrayals in advertising: a research paper*. Women's Health Victoria, Gurrieri L, McKenzie M, Bugden M (2019), RMIT University. Melbourne. (Women's Health Issues Paper; 15)
- *Addressing and preventing sexist advertising: an analysis of local and global promising practice*, Gurrieri L, Hoffman R. (2019), RMIT University. Melbourne.

Engagement

Gathered through one-on-one interviews, workshops, discussion events and reference committee feedback, the framework applies rich insights from:

- the advertising industry, including creative agencies, media buyers, industry regulators and peak bodies
- marketers and brand owners
- the community
- Non-Government Organisations (NGOs) focused on gender equality, women's health, and addressing violence against women
- government.

Sustained industry engagement is a core part of this framework. This will garner further insights into the motivations and perceived barriers to change, as well as into which industry interventions might address the causes and symptoms of inequality in advertising. It may uncover which initiatives will work fast (motivating further change) and which are likely to have the greatest impact over time. It may also reveal industry leaders, who can be supported to become industry champions for change.



Enablers for change

A set of broad enablers underpin the priority areas for action in this framework. These enablers are intended to guide, reinforce and refine our approach to change.

They will coordinate effort and sustain momentum, ensuring all parts of the industry and regulatory system function in the best interests of brand, business and society. Some elements, such as research, have been recommended in more detail in some areas, where there is a specific or urgent requirement.

Shared vision for change

Creating meaningful change requires all elements of the system to act in the interest of a common goal.

Research

Further research is needed to fully understand the harm caused by sexist advertising, the potential solutions and the business case for promoting gender equality in advertising. Existing studies and stakeholder feedback highlight a set of research priorities, including:

- the prevalence of sexist advertising in Australia
- the economic benefits of promoting gender equality in advertising on sales and brand/reputation;
- the impact of sexist advertising in online marketing and social media;
- a sector-wide gender equity audit of advertising industry workplaces
- research to inform the future development of industry standards for gender equality in advertising;
- industry attitudes towards different regulatory models;
- the impact of sexist advertising on Australian audiences, including younger and older audiences, LGBTQI people, Aboriginal and Torres Strait Islander people, people living with disabilities, and people from various socioeconomic backgrounds;
- the health benefits of gender transformative advertising.

Knowledge and motivation

Understanding the harmful impacts of sexist advertising, community expectations of gender portrayals and the commercial benefits can increase motivation for change. It can encourage community to advocate for industry and structural change, including changes to legislation and regulation. It can encourage industry to shift culture and promote gender equality in advertising content and in the workplace.

A skilled workforce

Practitioners in the primary prevention of violence against women play a critical role in building the knowledge and capacity of industry and community to effect change. This workforce would benefit from an enhanced understanding of the specific role media and advertising can play in preventing violence against women and promoting gender equality, as well as the enablers and barriers to change in this context.

Structural change

Changes to legislation, industry regulation, workplace practices and policies can support shifts in social norms and market practices. At the same time, rising demand for gender equality among employees, consumers and constituents influences political will and industry motivation to enact structural changes.

Governance and expertise

A whole-of-system approach demands cross-sector representation and collaboration. It also requires expertise on gender as an issue distinct from broader diversity initiatives. A body dedicated to driving gender equality in advertising would maintain the momentum and focus necessary to achieve change.

Monitoring and evaluation

The outcomes stated in this framework should be monitored and evaluated, to enable continuous improvement and achievement of objectives across all areas, and to track changing attitudes over time.

Priority Area 1: Industry culture change

Goal

The advertising industry delivers content that promotes gender equality

Key outcome indicators

- Proportion of advertising industry agencies (creative agencies, media buyers, marketing researchers) with Chairs, CEOs or Managing Directors who are women
- Proportion of women in creative roles and in creative leadership roles
- Proportion of advertising and marketing professionals who can identify sexist advertising
- Proportion of advertising and marketing professionals who understand the harmful impact of sexist advertising

Why industry matters

The advertising industry, like many other sectors, still has work to do to improve gender equality in its workplaces.

Many firms in the industry have a male-dominated culture that perpetuates gender imbalances in leadership and creative roles. This imbalance contributes to the continued creation and validation of sexist advertising, and leads to comparably lower engagement with initiatives to promote gender equality than in other industries such as journalism.³⁷

This extends across agencies that create and deliver advertising products, to media buyers and owners and market researchers, as well as to businesses and brands that commission the work. Each of these parts of the industry has a role to play in shifting advertising culture away from the masculine norm.

Gender equality needs a specific focus

Many organisations, across different industries, are creating strategies and initiatives to increase diversity and inclusion in their workplaces. In advertising, some of these strategies also seek to change what we see in ads. Some focus on specific population groups (for example: LGBTIQ people, people living with disability, cultural diversity) while others consider all forms of diversity at once.

It's important for the advertising industry to give gender equality a distinct focus – one that's separate from broader diversity and inclusion initiatives, and recognises how gender inequality interacts with other forms of discrimination.

³⁷ Gurrieri L, Hoffman R. 'Addressing and preventing sexist advertising: an analysis of local and global promising practice', 44.

Singling out gender equality is important because:

1. Sexist advertising has significant negative impacts on the health and wellbeing of women and girls.
2. Sexist advertising contributes to violence against women by shaping social attitudes towards women and girls.
3. Some of the most prevalent harmful portrayals in advertising – sexualisation and objectification, and promotion of unrealistic beauty ideals – particularly affect women and girls.
4. There is a high level of community concern about the way women and girls are portrayed in advertising, evidenced by the number of complaints received by Ad Standards, as well as qualitative research.³⁸
5. Promoting gender equality in advertising is good for business.

Changing advertising involves not only seeing greater numbers of women and girls in advertising, but also transforming the story advertising tells through its representation of women and girls.

Creating gender equality requires a shift away from outdated stereotypes and sexualised and limited portrayals. It includes greater representation of the diversity of women in Australia, including women and girls from migrant and refugee backgrounds, Aboriginal and Torres Strait Islander women, women with disabilities, LGBTIQ women and gender diverse people.

As the advertising industry increasingly makes gender equality a priority – and better reflects the diversity of women, girls, boys, men and gender diverse people that we see in our communities – we will start to shift how women and girls are perceived and valued in society.

What influences the advertising industry?

What we see in ads is particularly influenced by four factors:

- The gender dynamics in advertising workplaces
- Lack of understanding among many industry professionals of the harmful impacts of sexist advertising, and of the business benefits of promoting gender equality in advertising content
- Industry awards and how to win them
- The relationship between advertisers and creatives.

³⁸ Gurrieri et al. 'Community responses to gender portrayals in advertising: a research paper'.

³⁹ Green, R. 'The Agency Circle Summary of Results from the 3rd year of creative diversity inclusion survey'. *Campaign Brief*. Accessed: 18 November, 2019. <https://campaignbrief.com/the-agency-circle-summary-of-results-from-the-3rd-year-of-creative-diversity-inclusion-survey/>

The gender dynamics of the advertising industry are unequal

Shifting the gender balance in advertising has started, but it has a long way to go before equality is achieved. Like in other male-dominated industries, this will take concerted effort and time.

Promoting gender equality within the industry will lead to better and more creative decision-making. It will mean that those who make advertising increasingly reflect the diversity of the consumers who buy the products they are trying to sell.

Men hold the lion's share of senior positions in advertising agencies. This is particularly acute in creative teams. One small industry survey involving more progressive agencies found that 38% of creative roles in Australian agencies are held by women and only 29% of agencies have women in senior leadership positions (Chair, CEO or Managing Director).³⁹ Anecdotal evidence suggests that women in senior leadership positions across the whole industry is likely to be lower.

Gender ratios are important because they impact on cultural norms, unconscious bias, behavioural cues and ultimately how and what decisions are made.⁴⁰

Conscious, ongoing efforts are required to shift policies, practices and structures that perpetuate gender inequality in the advertising industry. Limited parental leave, long working hours and a lack of flexibility are barriers to greater gender equality.⁴¹ Masculine organisational cultures that prioritise competition and aggression can also create macho, hostile or unsafe environments that exclude women.⁴²

Leaders in this industry, as in others, need to speak out and drive the structural changes required to shift industry culture.

⁴⁰ Benko, C. & Pelster, B. 'How Women Decide'. *Harvard Business Review*. Accessed: 18 November, 2019. <https://hbr.org/2013/09/how-women-decide>

⁴¹ State of Victoria (Department of Premier and Cabinet), *Safe and strong: A Victorian Gender Equality Strategy: Preventing violence against women through gender equality*, 2016. Accessed: 18 November, 2019. <https://www.vic.gov.au/safe-and-strong-victorian-gender-equality>

⁴² Our Watch et al, 'Change the Story', 26.

Promising practice

Industry workplace initiatives

In Australia and overseas, there have been industry-led initiatives to increase diversity, equity and inclusion within workplaces, including through awareness raising, training, mentoring and policy changes.

Mumbrella360

Mumbrella360 is Australia's biggest media and marketing conference, delivering an annual program of industry-curated discussions and events. In 2016, the organisers changed their policies to require broader gender representation on all panel submissions. With no evident resistance from industry stakeholders, Mumbrella360 quickly experienced an increase in proposals featuring greater female representation.

VivaWomen!

Publicis Groupe Australia launched the local chapter of the group's global VivaWomen! initiative in 2018. The initiative aims to address the challenges facing women mid-career and provides them with the tools, motivation and confidence to progress into senior roles in their agencies. In 2018, 170 women from 13 brands participated in events and workshops across Australia as part of VivaWomen! Several major Australian agencies have introduced measures to increase the number of female leaders including: gender targets (e.g. WPP AUNZ, Clemenger), longer parental leave (e.g. Publicis) and job share arrangements (e.g. The Monkeys). These practices tend to be more common among companies who commission these agencies. For example, NAB, one of Australia's largest advertisers, has a gender equality strategy, which sets gender targets across the business and an action plan to achieve this through improved career support, parental leave and support.

Changing the Ratio

Changing the Ratio is an annual conference, launched in 2018, aimed at driving diversity and inclusion in the Australian communications industry.

The Agency Circle

The Agency Circle is an industry body for Australian creative industries committed to increasing diversity launched in 2016 in response to frustrations at the lack of diversity within the industry. There are 25 member agencies. It has tracked diversity and inclusion with the advertising industry since 2016 through an annual survey.

#SeeHer

The US Association of National Advertisers runs the #SeeHer initiative in partnership with The Female Quotient. They have produced a toolkit for advertisers that highlights the best ads and content to create unbiased messaging. Since launching, authentic portrayals of women have increased from 51% in 2016 to 61% in 2018.

Creative Equals

Creative Equals is an initiative in the UK created to champion diversity and inclusion through training. This includes a future leaders' program, a conference and a diversity and inclusion accreditation.

Workplace gender equity measures

Several major Australian agencies have introduced measures to increase the number of female leaders including: gender targets (e.g. WPP AUNZ, Clemenger), longer parental leave (e.g. Publicis) and job share arrangements (e.g. The Monkeys). These practices tend to be more common among companies who commission these agencies. For example, NAB, one of Australia's largest advertisers, has a gender equality strategy, which sets gender targets across the business and an action plan to achieve this through improved career support, parental leave and support.

Industry awareness of the impact of sexist advertising is low

Industry professionals consulted as part of this project are often shocked to learn about the harmful impacts of sexist advertising and acknowledge the need for greater awareness of these impacts within the industry.

Unconscious bias, extensive exposure to gender stereotypes and limited ethics training all contribute to the production of harmful content.⁴³

Tertiary institutions and industry bodies like Ad Standards and AWARD School need to start educating marketing and advertising professionals about sexist advertising – what it is and how it causes harm.

Greater awareness of the business case for promoting gender equality in advertising content could also be fostered to drive change in the sector.

This can be made clear, for example, through the promotion of high-profile brands and case studies, and provision of tools that allow brands to measure the impact of gender portrayals in their ads. As detailed below in the #SeeHer example, several US-based companies found that purchasing intent increased in line with more authentic portrayals of women and girls.

⁴³ Gurrieri et al. 'Community responses to gender portrayals in advertising'.

Promising practice

Transforming the creative process

Gender portrayals must be considered deeply and early in the creative process for it to change. This includes understanding the harms associated with sexist advertising, and the benefits of change.

There are examples where these considerations have been integrated as part of procurement processes, market research or campaign evaluation. International examples are particularly promising.

Gender Equality Measure (GEM™)

The Association of National Advertisers, the largest marketing and advertising association in the US, has introduced a *Gender Equality Measure (GEM™)* as part of #SeeHer, an industry initiative to increase the authentic portrayal of women and girls in media and advertising. GEM™ is an open source data driven measure that identifies unconscious bias and provides measurement standards for quantifying consumer reactions to the portrayal of women in advertising and programming. Six advertisers (Anheuser-Busch, Clorox, Hershey, Kellogg's, Keurig, Dr Pepper and L'Oréal) tested their ads using GEM™. The results conclusively demonstrated a direct correlation between higher GEM™ scores and incremental sales lift.⁴⁴

Unstereotype Alliance

The *Unstereotype Alliance* is a collaboration between the UN and the World Federation of Advertisers to create unstereotyped advertising through research and action. Unilever, Google, Publicis, WPP, Ogilvy and Omnicom are among the members.

⁴⁴ IRI Worldwide, 'ANA SeeHer Expands Validation on Gender Equality in Ads with Sales Data from IRI Lift'. *SeeHer*. Accessed: 18 November, 2019. <https://www.seeher.com/press-release/ana-seeher-expands-validation-gender-equality-ads-sales-data-iri-lift>

Celebrating change through advertising industry awards

Advertising is heavily validated through its industry awards. Awards juries tend to be male dominated and reward work that is male-driven and male-targeted.

There have been notable efforts internationally to address this, particularly through the industry's pre-eminent awards, Cannes Lions. But significant work remains in challenging the unconscious bias that influences industry awards.

Promising practice

Advertising industry awards

Cannes Lions

Cannes Lions has launched several initiatives to address gender inequality in the industry including:

- Launching *See It Be It* in 2014, an initiative to work towards equal presentation of female and male creative directors. High potential female creatives are sponsored as part of this initiative to attend a leadership program at Cannes Lions, including observation of award deliberations.
- Introducing a new advertising award in 2015, *The Glass Lion: Lion for Change*. This award recognises work that 'challenges gender bias and shatters stereotypical images of men and women which remain rooted in marketing messages.'
- Introducing in 2017 new guidance for jurors which cautions them against awarding work that reflects gender bias. This guidance helps to address the awarding of prizes that perpetuates gender stereotypes and inequality.

Channel 4

In the UK, Channel 4 launched in 2017 an award that recognises ads that challenge ingrained female stereotypes.

Brand owners who commission work can influence those who create it

The dynamic between brand owners and creatives shapes the content that is produced. Each has a responsibility to shift how they brief, create and collaborate.

Brand owners play a key role in how they commission work and the parameters they set for who produces this content and what it portrays. Brand owners can also address gender stereotypes by integrating gender considerations into any marketing they procure or produce.

Taking a strong stance against sexist advertising is also good for business. 70-80% of purchasing decisions are made by women. In addition, across all sectors, consumers and employees are demanding more ethical behaviour.

Nearly two-thirds (63%) of global consumers prefer to purchase products and services from companies that stand for a purpose that reflects their own values and beliefs.⁴⁵

37% of Millennials, who are the largest spending generational group, say they have stopped or reduced a business relationship because of the company's ethical behaviour.⁴⁶ Ads that are gender inclusive and diverse are more likely to engage the next generation of customers.

Brand owners can play an important role in ensuring advertising better reflects customer values, by making their expectations around gender portrayals clear at the outset.

This starts with the procurement process. Brands should consider and discuss the gender composition of agencies' creative teams. These teams also need to be briefed to produce content that promotes gender equality through the stories they tell. Market researchers in turn should be briefed to consider the harmful impacts of sexist portrayals as part of research and campaign evaluation. Positive change can and should start at each level.

⁴⁵ Accenture, *To Affinity and Beyond: From Me to We: The Rise of the Purpose-led Brand* (2018) https://www.accenture.com/_acnmedia/Thought-Leadership-Assets/PDF/Accenture-CompetitiveAgility-GCPR-POV.pdf#zoom=50

⁴⁶ Deloitte, 'The Deloitte Millennial Survey', 2019. Accessed: 18 November 2019. <https://www2.deloitte.com/content/dam/Deloitte/global/Documents/About-Deloitte/deloitte-2019-millennial-survey.pdf>

Promising practice

Brand owners leading change

Victorian Government Communication Guidelines

The Victorian Government has played a leading role as an advertiser in setting guidelines for gender representation in its own advertising. The Victorian Government's Communication Guidelines require that the overall impression of any communication promotes gender equality. Many local councils have created similar communication guidelines.



What we can achieve in Priority Area 1

Goal

The advertising industry delivers content that promotes gender equality

Objectives	Outcomes
The advertising industry understands the impetus for gender equal advertising	Industry understanding of the harmful impacts of sexist advertising and communication of the importance of gender equal advertising internally and externally
	The business case for gender equality in advertising is measured and understood across the sector
Gender equality is promoted within the advertising industry	Industry attracts, promotes and retains more women in leadership positions
	Industry actively promotes gender equal advertising, including through procurement
	Industry is recognised and celebrated for creative work that challenges gender bias and stereotypes

Priority Area 2: Empowering community

Goal

Community critically engages with advertising, and advocates for gender equality

Key outcome indicators

- Number of complaints to Ad Standards relating to sexist advertising
- Proportion of community who recognise sexist advertising
- Proportion of community who understand the harmful impact of sexist advertising
- Proportion of community who know how to make complaints about sexist advertising

Why community matters

Community sentiment shapes government and industry regulation, policies and practices.

To change the regulatory and policy frameworks that underlie sexist advertising, we must equip community with information and resources that enable them to recognise sexist advertising, mitigate its harms and actively participate in promoting gender equality in advertising.

Local governments, community organisations, health services and other NGOs must also be resourced to deliver coordinated advocacy that ensures the community is protected from harm caused by sexist advertising. These groups also play a critical role at a community level, engaging schools and businesses to promote gender equality, increase media literacy and prevent violence against women, through workshops, training and events.

To empower community to act, we need to:

- Expand the evidence base
- Enable action through education
- Empower people to enact change
- Enhance advocacy efforts

Expand the evidence base

Research shows that sexist advertising causes harm by reinforcing gendered ideas about what it means to be a man or a woman.⁴⁷ It impacts on how adults and children see and value themselves, shaping and limiting their aspirations.

We don't yet have a complete picture of how this inequality impacts on specific population groups. Further research is needed on the ways that sexist advertising impacts women, men, trans and non-binary people, including Aboriginal and Torres Strait Islander peoples, migrants and refugees, people who live with disability or identify as gay, lesbian or queer.

⁴⁷ McKenzie et al. 'Advertising (in)equality: the impacts of sexist advertising on women's health and wellbeing.'

To shift the status quo and create meaningful, long-term change for all, we need to understand how multiple forms of discrimination and disadvantage can intersect for these groups, and the role of advertising in perpetuating these inequalities.

This research should also be used to guide government and industry in proactively leading change. Communities may influence the industry as consumers and audiences, and governments as constituents. But there is also an expectation that these two entities act in the best interests of the population, particularly given the evidence of negative social and economic impacts caused by sexist advertising.

It is also important to understand and track changing attitudes over time, as part of measuring the effectiveness of this strategic framework. This may be incorporated to an existing study, such as the *National Community Attitudes towards Violence against Women Survey* (NCAS).⁴⁸

Enable action through education

Community education is key to building momentum toward more progressive representations of gender in advertising.

The problem of sexist advertising often goes undetected due to the 'normalisation' of gender inequality, in advertising and in society more broadly. Once made aware of the harmful impacts of sexist advertising, community members have a strong appetite for change.⁴⁹

Build on existing campaigns

Community education on sexist advertising would build on existing community education campaigns, such as the Victorian Government's Respect Women: Call it Out campaign, which highlights the social norms underpinning inequality and violence. As few Australian campaigns have focused on the harmful impact of gender norms and stereotypes,⁵⁰ future campaigns could highlight their use in advertising, media, arts and entertainment, and show how they reinforce gender inequality. Advertising that challenges these stereotypes, and promotes gender equality, should also be highlighted. This would enable consumers to recognise it in the market and make more conscious purchasing decisions. Industry will also be further incentivised to change, as consumers proactively seek to support brands that promote gender equality.

48 ANROWS, 'National Community Attitudes towards Violence against Women Survey'. Accessed: 18 November 2019. <https://www.anrows.org.au/research-program/ncas/>

49 Gurrieri et al. 'Community responses to gender portrayals in advertising'.

50 Gurrieri L, Hoffman R. 'Addressing and preventing sexist advertising: an analysis of local and global promising practice', 37.

Consider multiple perspectives

Education initiatives should be grounded in an approach that recognises the varied ways in which sexist content impacts upon different people, including those facing multiple forms of discrimination and disadvantage. They should also include examples of ads that can have a positive impact on people, for example, by showing them as authentic and multidimensional.

Education empowers consumers to make conscious purchasing decisions, and actively support brands that promote gender equality.

Make tools accessible

Practical tools, such as Women's Health Victoria's guidelines for reporting sexist ads and information on the complaints process,⁵¹ will also ensure that the community is empowered to effect change. These need to be made broadly accessible, including to people from diverse cultural and linguistic backgrounds, people who live with disabilities, and people who live in regional areas.

Draw on expertise

Local government authorities, schools and NGOs, including women's health services, are well placed to provide community education on sexist advertising as part of their existing work to prevent violence against women and promote gender equality in local communities. These 'prevention practitioners'⁵² have broad reach and access via existing programs delivered in schools (such as Respectful Relationships Education), workplaces and public events / programs. Content on addressing sexist advertising may be integrated into these programs. These practitioners also have appropriate access and skillsets to engage population groups that are hard to reach, including people who are culturally and linguistically diverse or live with disability.

Integrate campaigns with community initiatives

Communities may also be engaged via marketing campaigns delivered at local, state and/or national levels. Research shows, however, that social marketing strategies are most effective when integrated and reinforced by on-the-ground activities. In addition, these strategies need to be supported by cross-sector partnerships to enable broad reach. For example, the 16 Days of Activism against Gender-based Violence is a worldwide initiative driven by the United Nations where regional communities deliver education and community-building events united by a global theme and hashtag.

51 Women's Health Victoria, 'Reporting sexist advertising: a toolkit for consumers'. Accessed: 18 November 2019. <https://whv.org.au/resources/whv-publications/reporting-sexist-advertising-toolkit-consumers>

52 Family Safe Victoria, 'Preventing Family Violence & Violence Against Women Capability Framework', 2017. Accessed: 18 November 2019. <https://www.vic.gov.au/sites/default/files/2019-05/Preventing-Family-Violence-and-Violence-Against-Women-Capability-Framework.pdf>

Empower people to enact change

Community members and people involved in grassroots activities can be particularly effective as agents for change because they may act independently of organisational interests and constraints. As voters and consumers, they can put pressure on governments and industry to act.

NGOs and individual community members are delivering significant grassroots work to engage communities on gender equality and related issues. Key initiatives for building awareness and action include community-building conversation events and online consumer activism. Through more focused initiatives, and bolstered by research, these existing efforts can be strengthened and scaled to extend their impact.

To support this, the community sector must be provided funding and resources to expand outreach, coordinate efforts and sustain engagement. Regional communities need specific and targeted support, as these are currently the most isolated and under-resourced.

Cross-sectoral partnerships that enable the sharing of resources, including research findings and coordination support, are critical to ensure community initiatives are strategically driven and informed by the evidence base.

Enhance advocacy efforts

Advocacy, from community organisations, can push government and regulatory bodies to revise or enact legislation, codes of ethics, practice guidelines and other structural mechanisms to promote gender equality in advertising and better reflect community standards.

But this only works if those organisations are effectively informed and resourced to influence change. Their work needs to be funded and coordinated by a central body, allowing other community organisations to endorse initiatives, submissions, statements or similar. There is an opportunity to expand existing local and regional strategies led by women's health services and councils, building the capacity of local governments, businesses and communities to take action to address gender inequality in advertising.

Promising practice

Community education

Integrated domestic violence campaigns

The Victorian Government's *Respect Women: Call it Out* campaign focuses on bystanders, aiming to provide them with the tools to call out disrespectful and sexist behaviour, a known driver of violence against women. The campaign features a series of television ads as well as online resources to support people in changing behaviour.

Few campaigns have focused on harmful gender norms and stereotypes, which contribute to gender inequality. One exception is the #BecauseWhy campaign, delivered by Our Watch, which engaged parents to recognise and counteract the impact of 'everyday' gender stereotypes, for example in books and conversational language. Initiatives that focus specifically on stereotyped representations in advertising, media, arts and entertainment may use similar tactics, including the provision of practical online tools to build media literacy and capacity to challenge unrealistic beauty ideals, sexualisation and other harmful effects.

Media literacy education

Media literacy relating to gender representations, body image and sexualisation is a specific focus of Personal, Social, Health and Economic (PSHE) area of secondary school education in the UK. PSHE is reinforced through Media Smart teaching resources, which are provided to support students to explore the relationship between advertising, gender representation and body image. There may be opportunities to integrate similar content to the Australian school curriculum, for example, the Respectful Relationships Education program in Victoria.

Geena Davis Institute on Gender in Media

The Geena Davis Institute on Gender in Media is a research organisation that works with the media industry in the US to engage creators, advertisers and community about the importance of progressive representations of gender. It has developed resources (such as games and learning programs) for parents and educators to teach children to recognise and challenge gender stereotypes.

Regional Action Plans to Prevent Violence against Women

Regional action plans to prevent violence against women are led by women’s health services across Victoria, and support a wide range of local organisations and businesses to take action to promote gender equality and prevent violence against women in their communities. Community- and organisational capacity-building is supported by tools and resources, including the Action to Prevent Violence Against Women online portal, which provides evidence on violence against women; a library of resources; a training portal; and connects local communities to their local women’s health service.

The Municipal Association of Victoria

As the peak body for local councils, the Municipal Association of Victoria, supports local governments to deliver, partner and lead work to promote gender equality and prevent violence against women in their communities. MAV’s work in this area includes the creation of a promising practice portal, the running of a Preventing Violence Against Women Network and a grants program.



What we can achieve in Priority Area 2

Goal

Community critically engages with advertising, and advocates for gender equality

Objectives	Outcomes
The evidence base on sexist advertising is strengthened	Baseline evidence is established to measure the prevalence of sexist advertising in Australia
	Understanding of the impact of gender portrayals on Australian audiences across demographics is strengthened
Community members understand the effects of sexist advertising and can identify it in practice	Community attitudes in relation to gender equality in advertising are measured and reported
	Communities are supported to recognise gender stereotypes in advertising and the harmful effects these have on the community
Communities are empowered to take action against sexist advertising	Resources are developed to support the public to challenge and report sexist advertising
	An online platform is created for sharing and distributing resources to address sexist advertising

Priority Area 3: Regulation and policy

Goal

Legislative and regulatory frameworks support and reinforce gender equality in advertising

Key outcome indicators

- The regulatory system is strengthened to enable effective enforcement of advertising standards for gender portrayals
- Number and proportion of total complaints relating to sexist advertising
- Number and proportion of advertisers who comply with Ad Standard Community Panel determinations relating to sexist advertising

Why regulation matters

Legislation and regulatory frameworks protect individual rights, public health, and safety by restricting or sanctioning certain behaviours.

They both set and reflect community expectations.

We put restrictions on advertising of alcohol or cigarettes, for example. This could also be applied to prevent sexist advertising, and to promote gender equality in advertising. When enforced, laws can be very effective in changing the structures and behaviours that lead to gender inequality. However, there are many challenges to legislative change and implementation.

Regulation of advertising in Australia

Australia's advertising industry is primarily self-regulated by the peak industry body, the Australian Association of National Advertisers (AANA).

The AANA's Code of Ethics (the Code of Ethics) provides the overarching set of principles with which all advertising and marketing communications, across all media, should comply. It applies regardless of whether the organisation is a member of the AANA. Section 2 of the Code of Ethics includes rules regarding the portrayal of people, violence, and the treatment of sex, sexuality and nudity, among other things. The AANA also administers various codes specific to the product, delivery and media. These codes are all technology and platform neutral and apply to all consumer advertising and marketing communication.

Alleged breaches of these codes are considered by Ad Standards. Complaints related to gendered or sexist portrayals are referred to the Ad Standards Community Panel – a group of 18 people appointed by the board, that represents a diverse range of age groups and backgrounds, and that is gender balanced. Individual Community Panel members do not represent interest groups and are individually and collectively independent of the advertising industry. Industry Practice Notes provide guidance on the interpretation of the Code of Ethics, and Section 2 of the Code is read and enforced with regard to 'prevailing community standards.'

A range of legislative and regulatory arrangements also apply to advertising. However, there are no federal laws that explicitly restrict or prohibit sexist advertising. Notably, broad anti-discrimination laws, such as the Commonwealth Sex Discrimination Act 1984 and the Victorian Equal Opportunity Act, do not apply to media or advertising despite prohibiting discrimination based on sex in other areas. Some states and territories have recently enacted legislation to enable the deregistration of vehicles that the Ad Standards Community Panel have determined to be in breach of the Code of Ethics. This method of co-regulation enables the enforcement of consumer complaints in cases of non-compliance by the organisation that is in breach of the Code of Ethics.

Governments can also use their legislative powers to promote gender equality within institutions and in their role as procurers.

The Federal Government, alongside the Governments of New South Wales, Victoria and Queensland are among the top twenty advertisers in Australia.⁵³ Their procurement frameworks are likely to influence the advertising industry. For example, the Victorian Government recently passed the *Gender Equality Act 2020* to promote gender equality within the state public sector, Councils and universities. Among other things, the Act empowers the Government to issue guidelines relating to procurement policies and practices for the purposes of promoting and advancing gender equality.



53 Chris Pash, 'The top 20 advertisers in Australia for 2019', *Ad News* 29 July 2019
<https://www.adnews.com.au/news/the-top-20-advertisers-in-australia-for-2019>

Australia's advertising legislative and regulatory system

Responsibility for the regulation of advertising in Australia falls under federal, state and territory and local jurisdiction.

This is because advertising appears across a range of platforms, both digital and physical, private and public.

Legislation and regulation

Federal government

- can make laws relating to:
- media and communications
 - intellectual property
 - consumer protection
 - misleading and deceptive conduct
 - human rights including gender equality

State and territory governments

- can make laws relating to:
- criminal law
 - environment and planning
 - health
 - roads and transport
 - human rights including gender equality

Local governments

- can make laws relating to:
- public health
 - safety and amenity in a municipality

Media-specific co-regulatory codes

- Commercial Television Industry Code of Practice
- Australian Subscription Television and Radio Association (ASTRA) Codes of Practice
- Commercial Radio Code of Practice

Delivery-specific codes

- Outdoor Media Association's voluntary principles
- Online Behavioural Advertising Guideline
- Native Advertising Principles

Product-specific codes

- Federal Chamber of Automotive Industries' (FCAI)
- Responsible Alcohol Marketing Code
- Responsible Children's Marketing Initiative

Advertising industry-wide codes

- Code of Ethics
- Code for Marketing & Advertising to Children
- Food & Beverages Advertising & Marketing Communications Code

Challenges under the current regulatory system

The effectiveness of the current regulatory system is influenced by the following key factors:

- The complexity of Australia's federal system
- The innate limitations of self-regulation
- The capacity of the Ad Standards Community Panel
- The effectiveness of the Ad Standards complaints system

Complexity of Australia's federal system

Australia's federal system presents challenges for legislative intervention in areas that impact on advertising, due to a complex jurisdictional arrangement.

Under this system, states have jurisdiction over environment and planning law, criminal law and transport law, while the Commonwealth has general legislative responsibility for media and communications.

Legislative changes may be required both at the federal and state level across a range of areas to provide for effective national enforcement mechanisms across all advertising platforms and technology. This requires substantive investment of time and resources – investments that are largely dependent on political will. To build political support for legislative change, there must be strengthened evidence of the harmful impact of sexist advertising and increased capacity in the community to advocate for change.

Limitations of self-regulation

There is an inherent conflict of interest in any industry regulating itself. Advertising is no different.

While marketing and advertising professionals recognise the need for regulation, there are a variety of views across industry, including that strengthened regulation may limit the industry's ability to exercise creative control. The current self-regulatory system, which is built on codes that are broad, open and lacking in substantive power, reflects this tension.

A lack of enforcement mechanisms is a key weakness within Australia's system of self-regulation.

Advertisers who are found to be in breach of the Code of Ethics are required to withdraw or modify the material so that it is no longer published or broadcast in the same format. Although there may be commercial consequences for breaching the Code of Ethics, such as the costs of withdrawing an advertisement and the reputational cost when a non-compliance decision is made public, the AANA cannot force advertisers to comply. While the AANA reports a 99% compliance rate, there are notable high-profile exceptions to this, including the long running controversies about advertising for Honey Birdette and Wicked Campers.

This is because the advertising industry is driven by market pressures, which may mean that it is in the interest of an advertiser to flout regulations for greater publicity. This is what Ultra Tune did. Its ads have been found on multiple occasions by Ad Standards to be exploitative and degrading, violent or unnecessarily sexualised. But, because the ads were deemed a commercial success, Ultra Tune disregarded Ad Standards' requests to remove them.

Although it is only the minority of advertisers who fail to comply with Ad Standards rulings, these advertisers are often the worst offenders.

Their failure to comply, and the inability of government or the AANA to take action, sends a strong message to community. Evidence suggests that industry will only comply with self-regulatory codes when it is an alternative to legislation and/or litigation. If advertisers continue to ignore Ad Standards rulings, federal and state action may be required to create general laws that support enforcement in the form of co-regulation.

Capacity of the Ad Standards Community Panel

The Ad Standards Community Panel considers complaints relating to Section 2 of the Code of Ethics. This panel includes people from a broad range of age groups, gender and backgrounds and functions as an arbiter of 'community standards.' The advertiser and complainants can appeal a Community Panel decision. These are considered by Independent Reviewers who are respected figures from relevant backgrounds such as law or advertising.

The Community Panel is provided with guidance on issues to consider in assessing complaints. However, they are not specifically trained to understand and assess sexist advertising and to overcome the unconscious bias which may influence decision-making. No gender equity training or guidance is provided to the Independent Reviewers.

Despite over half the complaints made in 2018 relating to gender portrayals,⁵⁴ no gender or sexist advertising expert is part of the complaints process.

Evidence shows that gendered portrayals are so pervasive that stereotypes, sexualisation and underrepresentation of women in advertising have become normalised. As a result, the general public, including those on the Community Panel, may not be aware of problematic gender portrayals.⁵⁵

Effectiveness of the Ad Standards complaints system

Low public awareness of the Code of Ethics and complaints system is a barrier to effective enforcement of the Code.

The complaints system relies on consumers knowing about the complaints process and being empowered to lodge complaints in response to sexist advertisements. While complaints have been rising – Ad Standards received 6,696 complaints in 2018, the highest number recorded in its 20-year history and a 3.5 per cent increase from 2017⁵⁶ – recent research indicates there is limited knowledge of the complaints system among the general public.⁵⁷

Long lag time between a complaint being made and a decision or outcome means that harm has often already been caused by the content. Efforts should be made to reduce the time taken to review complaints and to inform the public when complaints are made, which may help to mitigate or protect against the potential harms. For example, Ad Standards could publish or announce via social media, when a complaint has been made about an advertisement. This would alert the public to the potential harm caused by an ad.

54 Gurrieri L, Hoffman R. 'Addressing and preventing sexist advertising: an analysis of local and global promising practice', 29.

55 Gurrieri et al. 'Community responses to gender portrayals in advertising'.

56 Ad Standards, 'Review of Operations 2018'.

https://adstandards.com.au/sites/default/files/ad_standards_review_of_operations_2018_final.pdf

57 Gurrieri et al. 'Community responses to gender portrayals in advertising'.

Promising practice

Regulation and policy

Several European countries have specifically legislated to address gender discrimination in advertising, including through co-regulatory frameworks. In Australia, states and territories have recently taken action to strengthen industry codes, by introducing stronger regulation of advertising on vehicles.

State-based legislation that supports Ad Standards rulings in Australia

State governments have enacted legislation in response to the sexist and degrading slogans featured on Wicked Campers, a Queensland based camper van rental company. The company was found to have contravened the Code of Ethics on 79 occasions as of March 2018 but ignored all these rulings.⁵⁸ As Wicked Campers owned the vehicles that displayed the advertising, there were no media owners or agencies that the AANA could engage to enforce the decision. In response, and with public support, the Queensland Government enacted legislation enabling it to deregister vehicles found to have been the subject of an adverse Ad Standards ruling. Tasmania, the Australian Capital Territory and the Northern Territory have followed. Victoria has recently passed similar legislation with South Australia having committed to introduce the same.

Co-regulatory system in the UK

The UK's Advertising Standards Authority (ASA) administers a co-regulatory system for broadcast advertising. Its co-regulation authority is derived from Ofcom, the UK's independent communications regulator, through the Communications Act 2003. While the ASA is responsible for applying the Code, it can refer broadcasters to Ofcom for further action if needed. In 2019, the ASA introduced new standards banning gender stereotypes that are likely to cause harm, or serious or widespread offence. It also issued advertising guidance on the interpretation of these new rules. As of October 2020, this has resulted in two ads being banned.

58 Gurrieri L, Hoffman R. 'Addressing and preventing sexist advertising: an analysis of local and global promising practice', 16.

Legislative prohibition of sexist advertising in Europe

Seven European countries have legislated to prohibit gender discrimination in advertising (Belgium, France, Greece, Finland, Hungary, Ireland, UK). In addition, Norway and Spain have specific legislation that addresses the portrayal of gender in advertising. Iceland’s Act on the Equal Status and Equal Rights of Women and Men mandates that advertisements must not be belittling or disrespectful towards any sex and must not run contrary to gender equality in any way.

Regulation of outdoor advertising in Paris

The City of Paris has introduced new regulations prohibiting ‘sexist, lesbophobic and/or homophobic stereotypes, as well as degrading, dehumanising and vexatious representations of women and men’, among other things. As a result, the City reviews all advertising before it is displayed on their municipality-controlled billboards. While such regulations send a powerful message to advertisers about appropriate content, it cannot prevent sexist advertising on private property within the municipality.

Austrian Advertising Council advisory board on anti-sexism

In Austria, where over half of all advertising complaints relate to gender portrayals, the Austrian Advertising Council has established an advisory board on anti-sexism. The board has gender experts to monitor gender discriminatory content and promote progressive portrayals in the industry.



What we can achieve in Priority Area 3

Goal

Legislative and regulatory frameworks support and reinforce gender equality in advertising

Objectives	Outcomes
Industry codes of practice are clear and evidence-based and complaints processes are transparent	The AANA works with gender experts to develop clear codes and guidelines on acceptable content in relation to gender stereotypes and sexist advertising
	Complaints are published by Ad Standards and can be tracked through the review process
Gender equality considerations are embedded into industry regulatory and decision-making processes	Training is delivered for all Ad Standards Community Panel members to enhance awareness of the harmful impact of gender stereotypes and sexist advertising
	Decisions made by the Ad Standards Community Panel align with expert perspectives on the harmful impacts of sexist advertising
The regulatory framework is strengthened to enable effective enforcement of advertising standards for gender portrayals	Industry and community leaders support legislative or regulatory changes to strengthen compliance with industry codes
	Regulatory levers available at the state and local government levels are assessed
	The Victorian Government plays a leadership role in strengthening regulation of sexist advertising

What's next



How we will achieve our vision

Gender equality in advertising can only be achieved when each part of the system works to realise a shared and unequivocal vision.

Our vision

Advertising shows all people, regardless of their gender, as authentic and multidimensional – supporting a society in which all people are viewed and treated as equal and live free from violence.

How we will achieve it

This vision will be realised when the objectives outlined in this framework are achieved. In summary, our framework recommends the following action areas.

 <h3>Industry culture change</h3>	<p>The advertising industry understands the impetus for gender equal advertising</p> <hr/> <p>Gender equality is promoted within the advertising industry</p>
 <h3>Empowering community</h3>	<p>The evidence base on sexist advertising is strengthened</p> <hr/> <p>Community members understand the effects of sexist advertising and can identify it in practice</p> <hr/> <p>Communities are empowered to take action against sexist advertising</p>
 <h3>Regulation and policy</h3>	<p>Industry codes of practice are clear and evidence-based, and complaints processes are transparent</p> <hr/> <p>Gender equality considerations are embedded into industry regulatory and decision-making processes</p> <hr/> <p>The regulatory framework is strengthened to enable effective enforcement of advertising standards for gender portrayals</p>

To achieve this, a more detailed action plan will be developed, providing stakeholders with clear direction on what needs to be done, how the actions should be sequenced and how progress will be measured.



Glossary

Advertising is 'any material which is published or broadcast using any medium or any activity which is undertaken by, or on behalf of an advertiser or marketer over which the advertiser or marketer has a reasonable degree of control, and that draws the attention of the public in a manner calculated to promote or oppose directly or indirectly a product, service, person, organisation or line of conduct'.

It does not include 'labels or packaging for products; corporate reports including corporate public affairs messages in press releases and other media statements, annual reports, statements on matters of public policy and the like; and in the case of broadcast media, any material which promotes a program or programs to be broadcast on that same channel or station'.⁵⁹

Sexist advertising takes a range of forms, including content that relates to: gender-based discrimination and vilification; gender roles and stereotypes; unrealistic and unhealthy body ideals; sexualisation and objectification; and representations of violence against women.⁶⁰

59 Australian Association of National Advertisers, 'Code of Ethics, July 2018'. Accessed: 18 November, 2018. http://aana.com.au/content/uploads/2018/07/AANA_Code-of-Ethics_July2018.pdf.

60 Gurrieri L, Hoffman R. 'Addressing and preventing sexist advertising: an analysis of local and global promising practice', 10.

61 Department of Health and Human Services (Victoria). 'Free from Violence: First Action Plan 2018–21'. (Melbourne: Department of Health and Human Services, 2018). Accessed: 18 November, 2019. https://www.vic.gov.au/system/user_files/Documents/fv/1710039_Free%20from%20Violence%20First%20Action%20Plan%202018-2021%2016.pdf

Gender equality affords equal rights, responsibilities and opportunities to women, men, trans (and gender diverse) and intersex people.⁶¹ Equality does not mean that everyone will become the same but that their rights, responsibilities and opportunities will not depend on their gender.⁶²

Gender inequality is the unequal distribution of power, resources, opportunity, and value afforded to men and women in a society due to prevailing gendered norms and structures.⁶³

Norms, practices and structures are the three elements that comprise the socio-ecological model for individual behaviour. Social and cultural norms are dominant 'ideals, values or beliefs that are common in a society or community'. These are reflected in institutional or community practices and behaviours, supported by formal and informal structures such as legislation or community hierarchies.⁶⁴

62 State of Victoria (Department of Premier and Cabinet), 'Safe and strong: A Victorian Gender Equality Strategy: Preventing violence against women through gender equality', 2016. Accessed: 18 November 2019. <https://www.vic.gov.au/safe-and-strong-victorian-gender-equality>

63 Our Watch et al, 'Change the Story', 8.

64 Our Watch et al, 'Change the Story', 21.

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