



**SUBMISSION PREPARED BY  
THE SALVATION ARMY AUSTRALIA SOUTHERN TERRITORY**

**FOR**

**THE HOUSE OF REPRESENTATIVES STANDING COMMITTEE ON  
SOCIAL POLICY AND LEGAL AFFAIRS ON THE REGULATION OF  
BILLBOARDS AND OUTDOOR ADVERTISING.**

**FEBRUARY 2011**



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This submission to the House of Representatives Standing Committee is provided on behalf of The Salvation Army Australia Southern Territory. The Southern Territory includes Salvation Army services across the jurisdictions of Victoria, South Australia, Western Australia, Tasmania and the Northern Territory.

The Salvation Army has been operating in Australia for 130 years and is one of the most recognised and well respected charitable, welfare organisations. As an indication of our reach to the community, each year over a million people in Australia receive assistance from The Salvation Army. A diversity of services are provided, including: addictions, aged care, family support, out of home care, accommodation and homeless services, disability services, emergency disaster responses, employment services as well as financial assistance and counseling.

The Salvation Army has a long history of assisting the most vulnerable and marginalised in our communities and we therefore, welcome the opportunity to provide this submission to the House of Representatives Standing Committee and contribute to its inquiry into the regulation of billboard and outdoor advertising.

This submission recognises that the Inquiry is examining the regulation of billboard and outdoor advertising with regard to: the self-regulatory scheme for advertising, industry codes for advertising, trade practice and fair trading legislation, technical developments and regulatory burdens on business. To fulfil the Inquiry's Terms of Reference, these matters must be considered within a framework based on the principles of respect, human dignity, compassion, justice and fairness.

This submission will consider community concerns and ethical standards in public advertising, as listed within the Terms of Reference for the Inquiry. More specifically, it will consider the role of billboard and outdoor advertising in the escalating sexualisation of children, in particular young girls. As such, these comments are pursuant to Section 2.3 of the Australian Association of National Advertisers' Code of Ethics (sex, sexuality and nudity). It is worth noting that 7 out of 10 of the most complained about advertisements in 2010 were in relation to this area of the Code<sup>1</sup>.

The 21<sup>st</sup> Century has seen a continuing escalation of advertising and marketing technology from traditional sources such as billboards to social networking sites. Technological advances have also changed the nature and level of sophistication available for advertising purposes. Growing prosperity in Australia has also resulted in children, tweens and teenagers becoming a significant marketing target cohort.

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<sup>1</sup> Advertising Standards Bureau. 2009 Statistics [viewed on-line 7 February 2011] Available: <http://www.adstandards.com.au/storage/55eb81b8b615d57e0ab73ce5b2f33ed8.Stats2009Graphs%20-%20finalx.pdf>

Billboards and outdoor advertising are a particular form of ubiquitous advertising that by their very nature invade public visual space without discrimination or individual consent. Exposure to billboards and outdoor advertising is consequently difficult to avoid and as such the symbolic representations and images displayed have the potential to impact children and young people. These factors along with changing societal attitudes and tolerances have resulted in exposing children and young people to added physical and psycho-social risks at critical phases of their development.

The Salvation Army acknowledges that both girls and boys are vulnerable to hyper sexualised adult norms, however, the extant research available on the harm to girls is overwhelming and requires urgent action from business, government and the community.

The seminal research reported by the American Psychological Association Task Force on the Sexualisation of Girls (2007)<sup>2</sup> links the objectification and sexualisation of girls and young women with a number of negative outcomes.

...there is evidence that sexualisation contributes to impaired cognitive performance in college-aged women, and related research suggest that viewing material that is sexually objectifying can contribute to body dissatisfaction, eating disorders, low self-esteem, depressive affect, and even physical health problems in high-school-aged girls and young women (p.23).

Objectification is reinforced by the ways in which sexual content is embedded within a cultural context. Sexualised representations of girls and women therefore, become normalised and normalising (p.3). Billboards and outdoor advertising are especially potent given their pervasive visual and physical presence.

Research undertaken in Australia supports the findings of the benchmark APA report, for example; *Corporate Paedophilia: Sexualisation of children in Australia*<sup>3</sup>; *Faking It: The female image in young women's magazines*<sup>4</sup>; and, *Sex in public: Women, outdoor advertising and public policy*<sup>5</sup>. The body of research evidence has reached alarming proportions that concern The Salvation Army and are supported by anecdotal evidence from Salvation Army staff working with children and particularly disadvantaged girls.

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<sup>2</sup> Report of the APA task force on the sexualisation of girls, Washington DC. [Viewed on-line 7 February 2011] available: <http://www.apa.org/pi/women/programs/girls/report.aspx>

<sup>3</sup> Rush, E., & La Nauze, A. (2006). *Corporate Paedophilia: Sexualisation of children in Australia*. Canberra: Australia Institute.

<sup>4</sup> Tankard Reist, M. (2007). *Faking It: The female image in young women's magazines*. Canberra: Australia Institute.

<sup>5</sup> Rosewarne, L. (2007). *Sex in public: Women, outdoor advertising and public policy*. Newcastle, UK: Cambridge Scholar's Press.

The recent *Report Card on the Wellbeing of Young Australians*<sup>6</sup> produced by the Australian Research Alliance for Children and Youth (ARACY) demonstrated that despite Australia's economic prosperity, when compared on an international scale, the wellbeing of Australia's children did not rate as highly as might be expected.

Consequently, given the body of evidence above, The Salvation Army calls for particular attention to be afforded to protecting girl's rights given that their developmental state makes them particularly vulnerable to negative consequences from sexualised images and representations.

In the matter of self-regulation The Salvation Army contends that this has not been as successful as originally intended. The community disquiet and the level of complaints to the Advertising Standard Bureau in relation to 2.3 of the Australian Association of National Advertisers' Code of Ethics (sex, sexuality and nudity) indicates that changes are needed. This is evidenced by such complaints regarding outdoor advertising (23.92%) ranking second only to television complaints<sup>7</sup>.

The system at present relies on the public's constant vigilance and commitment to lodge complaints to the Advertising Standards Bureau. In the matter of sexualised images the onus of proving the image does not promote negative outcomes for girls and indeed women must be returned to advertisers. The Salvation Army further contends that the existing self-regulatory system has been unsuccessful in protecting the rights and interests of children and girls in particular in relation to sexualisation. Children and young people, given their developmental stage, have limited ability to advocate for themselves or use grievance systems designed for adults. As such, the self regulatory system currently in place, offers little protection for children's rights whose voice may be absent nor does it work to specifically monitor, analyse and act on issues impacting children.

The Salvation Army urges the Inquiry to recommend strengthening of the regulatory framework and the development of much clearer mandatory guidelines on excluding sexualised images that impact the development and self-image of girls and women. The Salvation Army also recommends that further advice is sought on developing these guidelines from children's advocates such as state Commissioners for Children, children's researchers, women's groups, welfare agencies, child educators and health specialists.

The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance.

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<sup>6</sup> *Report Card on the Wellbeing of Young Australians* [viewed on-line 9 December 2010]. Available: [http://www.aracy.org.au/publicationDocuments/REP\\_report\\_card\\_the\\_wellbeing\\_of\\_young\\_Australians\\_A5.pdf](http://www.aracy.org.au/publicationDocuments/REP_report_card_the_wellbeing_of_young_Australians_A5.pdf)

<sup>7</sup> Advertising Standards Bureau. 2009 Statistics [viewed on-line 7 February 2011] Available: <http://www.adstandards.com.au/storage/55eb81b8b615d57e0ab73ce5b2f33ed8.Stats2009Graphs%20-%20finalx.pdf>