

Advertising policy

July 2019

Context

Southwark Council does not support advertising that is contrary to the [Council Plan](#) aims and commitments. Of particular relevance to the advertising policy is the Council commitment to promote a healthier and great start in life¹.

The advertising policy reflects both the UK's Code of Broadcast Advertising section on Prohibited Categories² as well as Transport for London's (TfL) guidelines on advertising food and non-alcoholic drink products that are high in fat, salt and sugar (HFSS).

Advertising policy

This policy is applicable to all advertising opportunities through the Council, including through any third party letting or leasing arrangements.

Advertisements of any of the following products or services will not be permitted by Southwark Council:

- Alcohol and tobacco products
- Food and non-alcoholic drinks that are high in fat, salt and sugar (HFSS)
- Drugs/ illegal substances
- Nudity, pornography, prostitution or sexual messaging services
- Gambling and betting
- Weaponry including knives
- No win, no claim services, payday lenders or pyramid promotional schemes
- Hateful or discriminatory content.

With regards to alcohol, the promotion of an alcoholic drink or an alcoholic brand is not permitted. This includes low-alcohol alternatives.

With regards to HFSS, the policy does not ban whole brands or organisations from advertising, as they are able to promote healthier alternatives. Further information is provided in Appendix 1.

All advertisements also need to comply with the Council's broader [guidelines](#) on advertising in public spaces.

The Council retains the right to decline advertisements from any organisation, individual, event or campaign that it considers inappropriate.

Policy implementation

This policy will come into effect for all new leases from **1st July 2019** and for all current leases as they come up for renewal.

All current advertising providers within the borough will be contacted and encouraged to adopt this policy, in advance of their contract renewal date.

¹ <http://www.southwark.gov.uk/council-and-democracy/fairer-future/fairer-future-commitments?chapter=7>

² https://www.asa.org.uk/type/broadcast/code_section/10.html

The advertising policy will be reviewed annually.

Appendix 1 HIGH FAT, SALT, SUGAR (HFSS) PRODUCTS

Young people who recall seeing junk food adverts every day are more likely to be obese³. Southwark has amongst the highest rates for childhood obesity nationally. Almost 40% of 10-11 year olds in Southwark are overweight or obese. This continues into adulthood, with just under 60% of the adult population overweight or obese⁴.

In February 2019, Transport for London (TfL) introduced an advertising ban on all food and non-alcoholic drink products that are high in fat, salt and sugar (HFSS). This ban is across all advertising opportunities on the TfL estate (including bus stops, taxi wraps and stations). The ban focuses in particular on products that contribute to childhood obesity.

To ensure consistency across London and to remove any ambiguity of what can be advertised, with regards to food products and non-alcoholic drinks, the HFSS elements of this policy is based on TfL's advertising ban. TfL developed their policy with the Greater London Assembly (GLA). More information can be found [here](#).

1. Advertisements of food and/or non-alcoholic drink products rated high in fat, salt and/or sugar (HFSS) will not be permitted
 - This includes advertisements where there is a range of food/non-alcoholic drinks featured, and at least one is a non-HFSS product. For example, when promoting a meal within a restaurant or from a delivery service
 - All products within the advert need to be non-HFSS
2. All food and non-alcoholic drink brands, service companies or ordering services can advertise providing it is their healthier options, consisting of non-HFSS products only.
 - Brand only adverts must promote healthier options (i.e. non-HFSS) as the basis of the copy
3. Advertisements cannot show or feature HFSS products 'incidentally', even if they are not the subject of the advertisement
 - This can include being referenced through text or graphic
 - Additionally, this includes any products that are not specifically identifiable but can still be assessed for a HFSS status
 - Where a food or non-alcoholic drink item is featured incidentally and does not relate to a specific identifiable product, which can be assessed for its HFSS status, advertising copy may be rejected by Southwark Council on the basis that the advertisement still promotes the consumption of HFSS products

The UK Nutrient Profiling Model (NPM), developed by the Food Standards Agency, is to be used to identify HFSS products that contribute to childhood obesity. The NPM is available [here](#).

³ <https://www.cancerresearchuk.org/about-us/cancer-news/press-release/2018-03-15-obesity-risk-doubles-for-teens-bombarded-with-junk-food-adverts>

⁴ Public Health Outcomes Framework

Potential exemptions on HFSS products

The Council retains the right to decline advertisement from any organisation, individual, event or campaign that it considers inappropriate.

If a food or non-alcoholic drink product within an advertisement is rated HFSS, it will not be permitted. However, if an advertiser or brand does not believe the product contributes to childhood obesity, they can complete an exemption form for the Council to review.

Any potential exemptions will be reviewed by the Council on a case by case basis, with all decisions being made in accordance with TfL's guidance.

A HFSS food or non-alcoholic drink product will be permitted by the Council if it is not contributing to childhood obesity and can demonstrate this through the following criteria:

- The product must not be on Public Health England's sugar or calorie reduction [list](#). The list categorises foods and drinks of concern for obesity prevention. For example:
 - Breakfast cereals
 - Yoghurts
 - Sweet spreads and sauces
- The product must be the healthiest option available by the organisation or brand
- The product must not generally be consumed by children
- The presentation of the product or the advert should not be intended to appeal to children. For example:
 - Include a toy, gift or prize
 - Use licensed characters, cartoons, animals or fairy tales
 - Have a child-friendly product name
 - Use colourful exaggerated graphics

It is the responsibility of the advertiser or brand to demonstrate that the product meets the above criteria.

The exemption form is available on the Council's website. A separate exemption form will need to be completed for every HFSS product within the advertisement. An exemption form can only be resubmitted if new evidence is presented.

END.

Reviewed 24th April 2019