

Advertising Steering Group

DRAFT Minutes for meeting of 17 February 2017, 10.00-11.30

Venue: Palestra, 197 Blackfriars Road, SE1 8JZ

Attendees

Members:

Dr Mee Ling Ng (Chair)
Evelyn Asante-Mensah (by phone)
Dr Philippa Diedrichs
Tom Knox
Leah Kreitzman
Lexian Porter
Kim Sanders
Val Shawcross

Other attendees:

Philippa Kings, JCDecaux
Neil Skelton, Exterion Media
Tom Atkinson, TfL (secretariat)
Graeme Craig, TfL
Ann Cumming, TfL
Steve Taylor, TfL

Minutes

1	Chair's welcome and update on membership.
	Dr Mee Ling Ng (MLN) welcomed members to the inaugural meeting of the Advertising Steering Group (ASG).
2	Introductions and apologies.
	There were no apologies given. Attendees are recorded above.
3	Approval of draft Terms of Reference.
	The Terms of Reference were approved. The Terms of Reference are included in Appendix I. [Post meeting note: Further changes to the Terms of Reference to cover the declaration of interests may be proposed at the next meeting.]
4	Presentations by TfL's advertising partners on the number of campaigns run, category breakdowns, number of amendments and rejections, advertisements with the most complaints, and examples of best practice.
	Presentations were given by Neil Skelton (NS) from Exterion Media and Philippa Kings (PK) from JCDecaux which included: <ul style="list-style-type: none">• The copy approval process;• Number of advertisements run from 11 July 2016 – 31 December 2016;• Complaints received directly by Exterion Media and JCDecaux, either directly from members of the public or via the Advertising Standards



	<p>Authority (ASA);</p> <ul style="list-style-type: none"> • Examples of best practice advertising on the TfL network. <p>In the period 1 July 2016 to 31 December 2016, Exterion Media and JCDecaux carried some 7,000 advertisements.</p>
5	<p>Discussion: Briefing pack: TfL Advertising Policy, the approvals process and complaints.</p>
	<p>Members discussed how TfL and its advertising partners frequently worked with advertisers from the early stages of development of advertisements to ensure that campaigns meet the TfL Advertising Policy.</p> <p>Members said that there appear to have been a low number of complaints compared to the number of advertisements run. Members said that TfL should continue to monitor how it captures complaints to ensure all complaints are recorded.</p> <p>Members noted that the updated TfL Advertising Policy appears to be working and was helpful to TfL's advertising partners and to advertisers.</p> <p>Members discussed body image in advertising. The Mayor of London and TfL were praised for having an Advertising Policy that explicitly mentions body image. Members said that whilst advertisements are reviewed on a case-by-case basis, the Advertising Policy must be applied consistently. Members noted that issues could be subjective.</p> <p>Members discussed diversity in advertising and asked how TfL could encourage more diversity in advertising on its transport network. Recent examples from the advertising industry showed efforts to have more diversity in advertising, for example in sexuality and disability.</p> <p>Members discussed specific types of advertising, including for financial products.</p> <p>Members said that TfL could do more to make its customers aware of issues and challenges around advertising and lead on encouraging more appropriate advertising more widely.</p> <p>Briefing pack: TfL Advertising Policy, the approvals process and complaints is included in Appendix 2.</p>
6	<p>Consideration of recommendations to TfL</p>
	<p>The minutes will be sent to the Mayor of London to be noted.</p>
7	<p>Suggestions of topics to discuss at the next meeting</p>
	<p>ASG agreed to discuss the following topics at the next meeting:</p> <ul style="list-style-type: none"> • What TfL can do to encourage more diversity in advertising; and • An introduction to academic research on body image and body image in advertising.

8	Date of next meeting
	The date for the next meeting is to be confirmed.
9	Any other business
	There were no items of any other business.

Appendix I – Terms of Reference as approved

Advertising Steering Group

Terms of reference

Purpose

The purpose of the Advertising Steering Group (the Group) is to provide advice and guidance to TfL on the implementation of its Advertising Policy (the Policy).

The Policy sets out the standards for the commercial advertising that will be accepted on TfL’s advertising estate and is implemented on TfL’s behalf by its advertising partners. It also applies to the advertisements that TfL develops for its own services. The Group’s advice and guidance will help TfL to generate commercial revenues from its advertising estate whilst ensuring advertisements are appropriate.

The overall aim of the Policy is to set out helpful guidelines to the advertising industry and its clients and promote a collaborative approach to copy development. The intention is not to be a censor but to encourage the production of advertising content which reflects the multi-cultural and pluralist nature of London and enhances the value and perceptions of TfL’s advertising assets.

The Mayor of London has been explicit about the need for no advertising on the TfL network to be inappropriate. The diversity of the audience on the TfL network is vast covering every age (including children), gender, sexual orientation, religion, language, heritage, economic background and interest. The TfL network is large, and in many places closed and unlike TV, online and print media, people cannot simply switch off or turn a page if an advertisement offends or upsets them including TfL staff who work around these advertisements all day.

Membership

The Group is chaired by a TfL Board member and is composed of a range of stakeholder and industry representatives. TfL acts as secretariat and TfL and the holder of its two largest advertising contracts will act as advisors to the Group.

Meeting Agenda and frequency



The Group meets twice a year, with briefing material being provided in advance by the Secretariat covering: general themes and details of the ads accepted since the last review; details of complaints; and campaigns accepted and refused. The Group is not required to review or approve individual advertisements and must recognise the commercial confidentiality of some of the topics discussed.

Members of the Group can suggest topics for the Secretariat to review and report back on. Members are encouraged to act not as representatives of particular stakeholder groups but as informed members of London's diverse population. Following each meeting the Chair will write to TfL setting out observations and recommendations.

Frequency and location

The Group meets twice a year, following the inaugural meeting in January 2017 six months on from the new Policy being implemented. The meeting is held in private and minutes and materials will be published online.

Format and Structure

Meetings last approximately 1.5 hours with a set agenda.

Agenda

1. Apologies and actions from previous meeting
2. Updates from our advertising partners on the number of campaigns run, category breakdowns and number of amendments and rejections
3. Update from TfL on number of complaints received. This would cover complaints through all reportable routes (to TfL and its advertising partners and complaints to the ASA).
4. Presentations by TfL's advertising partner(s) on creative, including advertisements with the most complaints and rejected advertisements. We will also include examples of best practice
5. Discussion and debate on the categories and advertisements
6. Consideration of recommendations to TfL
7. Review of draft Annual report, when relevant

Minutes

Meetings will be held in private and items for discussion will not be made publicly available prior to each meeting.

Minutes will be published on TfL's website no later than four weeks following each meeting. Presentations on advertisements with the most complaints will be published to encourage a collaborative approach to producing advertising copy that reflects London's diversity. Rejected advertisements may not be published, or only published subject to redaction.

Advertising Steering Group

Briefing Pack: The updated TfL Advertising Policy and complaints since its introduction

Background

The Mayor of London asked us to update our Advertising Policy following his election in May 2016 in order to ensure that all advertising on the our network is appropriate; with special emphasis on removing sexism or body shaming in advertising.

The updated Advertising Policy was introduced in July 2016. A new clause was inserted so that advertisements would be rejected if they “could reasonably be seen as likely to cause pressure to conform to an unrealistic body shape, or as likely to create body confidence issues particularly among young people”.

It should be noted that the Advertising Policy does not seek to be proscriptive except in specific cases. Indeed, whilst the Advertising Policy is now more explicit on issues including body image, in some areas it allows for a wider range of political advertising; for example, now allowing ‘political’ advertising and not allowing ‘party political’ advertising, where previously no ‘political’ advertising was allowed.

It is not our aspiration to become a censor, but we have an important responsibility as the operator of a large, and often closed, network, to ensure we don’t carry advertising which is offensive, insensitive, promotes violence, hate, intolerance or inequality, or is purposefully controversial.

Current status

We carry over **12,000 advertisements each year**, and we, and our advertising partners, review each and every one. We want to work with the advertising industry in partnership, and very few advertisements are rejected outright. In addition, only a small number of individual complaints about advertising on our network are received. Our two largest advertising partners received **over 6,900 advertisements between 11 July and 31 December 2016**.

Complaints

From the introduction of the Advertising Policy on 11 July to 31 December we received **86 complaints** from customers (received by us or our advertising partners). Note that the UK Security and Counter Terrorism advertisement ran on the National Rail network and did *not* run on our network (the advertisement was run by Network Rail, serving as a reminder that

our Advertising Policy applies equally to our own advertising as a transport authority – including safety messages – as it does to commercial brands).

Advertisement	Number of complaints
Islamic Relief	56
UK Security and Counter Terrorism *	6
Boux Avenue	4
Man In The High Castle	3
North Cyprus Tourism Board	2
Naked Magicians	2
Metallica	2
Missguided	2
Poppy Appeal	1
Central Intelligence	1
Protein World	1
Eve Mattresses	1
I am the Agent	1
Dior Sauvage	1
Okessay	1
Coca-cola	1
Not specified (sexual)	1
Total	86

We considered that the advertisements in the table above complied with the Advertising Policy. The majority of complaints during this period were on political or offence grounds, with the most complaints against an Islamic Relief poster. Complaints relating to body shaming or the sexual nature the advertisement were received against the Boux Avenue and Naked Magicians advertisements.

The advertisements with the most complaints are included here:

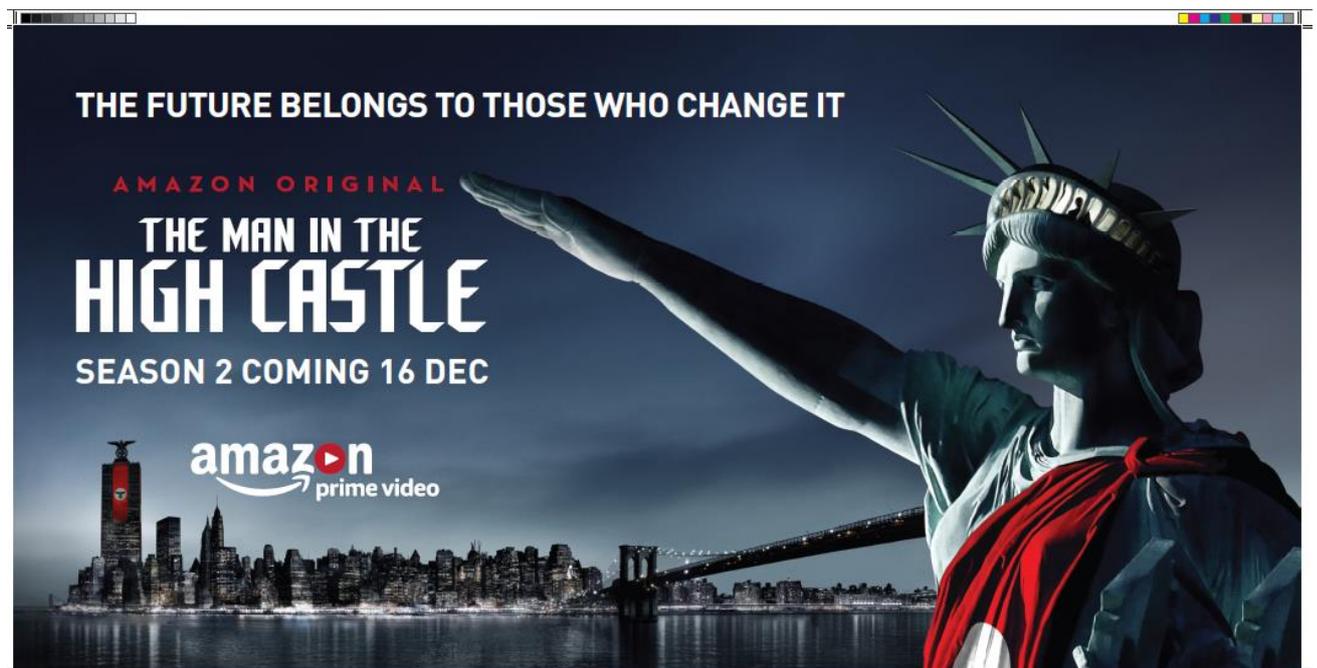
Islamic Relief:



Boux Avenue:



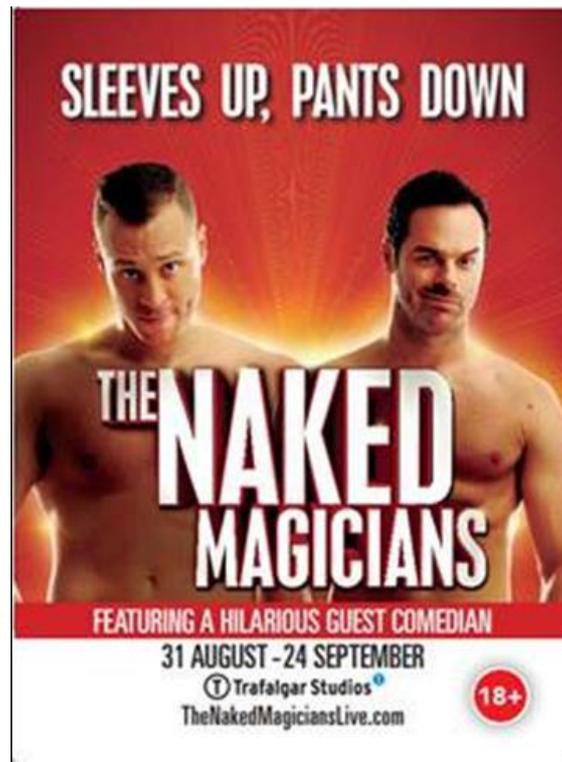
The Man In The High Castle:



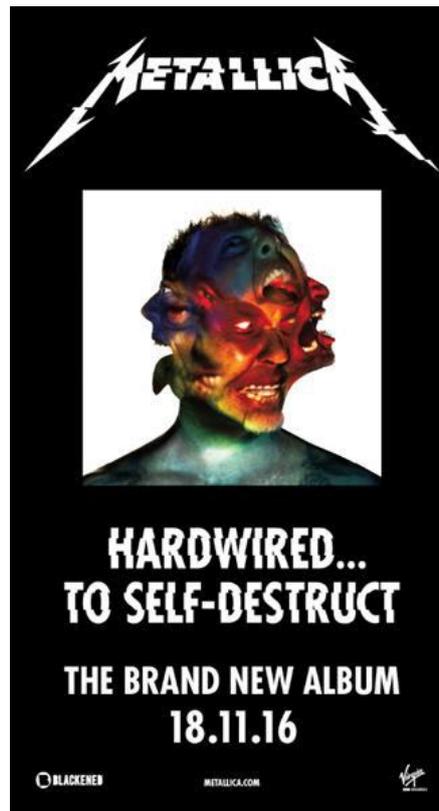
North Cyprus Tourism Board:



Naked Magicians:



Metallica:



Missguided:



Our advertising partners receive complaints from the Advertising Standards Association (ASA) directly and then inform us. From the introduction of the updated Advertising Policy on 11 July to 31 December 2016, our two largest advertising partners received 6 complaints from the ASA. The ASA upheld complaints regarding spurious product claims and price claims and on harm and offence. For example, an advertisement for crisps that tied the consumption of the product to the consumption of alcohol was deemed to be irresponsible.

Rejected advertisements

From the introduction of the Advertising Policy on 11 July 2016 to 31 December 2016 we **rejected 13 advertisements**. These were of advertisements referred to us by our advertising partners. Our advertising partners can reject advertisements without referring them to us, where they do not comply with the Advertising Policy. The advertisements were rejected on the following grounds – referring to clauses from the Advertising Policy:

Clause	Number of rejections
2.3	1
2.3 (a)	5
2.3 (b)	2*
2.3 (d)	1*
2.3 (f)	1*
2.3 (l)	4
2.3 (m)	1

* One advertisement was rejected on the grounds of 2.3 (b), (d) and (f).

It should be noted that a rejection does not mean that a campaign cannot run in an amended or revised form. We welcome brands going away and revising their advertisements, and can, in some cases, result in approved advertisements later on. In many cases, advertisers returned with new, revised submissions which were then approved to go up on the network.

The approvals process

We have a robust approvals process that starts with our advertising partners. Our advertising partners are empowered to consider advertisements submitted to them against the Advertising Policy – but also against ASA regulations and other relevant regulations and legislation – and can reject advertisements without referring them to us.

More often than rejecting an advertisement, our advertising partners work with the brand to amend an advertisement to a point where it does meet the Advertising Policy. Nonetheless, any advertisements that are contentious are referred to us to make the final decision – after guidance has been sought from CAP on whether the advertisement meets the CAP code.

An advertisement will often go through several tiers of approvals and amendments with our advertising partners before even being sent to us.

We always monitor complaints received once an advertisement is displayed, both from customers and from the ASA. The work of the Mayor’s Advertising Steering Group is one way

in which we can ensure our approvals process remains robust, by having your feedback on our implementation of the Advertising Policy informing our processes.

