

Transport for London Advertising Report

2018/19 and 2019/20



Contents

3 Foreword

4 Message from the Chair

5 Continued innovation and growth

13 Keeping our Advertising Policy relevant and effective

16 Promoting diversity

19 Advertising Steering Group

20 Facts and figures

22 Advertising categories

23 Complaints

25 ASA complaints

26 Campaigns declined

27 Contact us

Background

The purpose of this Advertising Report is to summarise the performance of the TfL advertising estate, one of the most valuable out-of-home advertising networks in the world.

It has a particular focus on the implementation of the TfL Advertising Policy, which sets out criteria for the acceptance of advertising on the estate and covers the types of advertising we run and the complaints received and resolved. It also provides an update on the investment in the network and the revenue performance.

This report is normally published some months after the end of the previous financial year, but this year we have taken the opportunity to bring forward the report for 2019/20 and combine it with the report for 2018/19. Going forward, we will now produce the Advertising Report around this time every year.

Foreword

We publish this report as London, and the world, is still dealing with the impacts of the coronavirus pandemic. Since the start of the crisis, we have worked tirelessly to make using our network as safe as possible for our customers, staff and contractors, while following advice from the Government.

The pandemic has had a major impact on our business, including our advertising estate. It is too early to say what the long term effects will be but we know the pandemic has significantly affected the advertising market and our advertising partners' businesses and we are working closely with them to mitigate the long-term impacts. Until the pandemic we had seen a continued increase in the revenue from our commercial media activities and we hope that this performance will be resumed in the longer term, underpinned by the investments we have been making in our commercial assets and activities.

Before the current crisis, we had continued to make good progress in upgrading our advertising estate. We are nearing completion of our £82.9m investment to upgrade and expand our digital advertising estate across our rail network and customers will have noticed some of the impressive new advertising screens at our stations. We have also expanded digital advertising across our bus shelters. This investment has helped drive revenue growth from our advertising estate, which is then reinvested back into our transport network.

With one of the most valuable out-of-home advertising estates in the world, our unique environment helps provide immersive advertising and partnership opportunities that are captivating for our customers. New anonymised Wi-Fi data shows the volume of people using our network so our partners can plan and measure their advertising campaigns in even greater detail. This data also gives us an even better understanding of our customers and helps us to improve their experience while travelling.

February 2020 was the first anniversary of the introduction of our policy to restrict advertising for food and non-alcoholic drinks high in fat, sugar or salt. We took this action at the direction of the Mayor in support of his London Food Strategy, which highlighted that London has one of the highest levels of childhood obesity in Europe. It has changed the way we work with agencies and brands, and we have invested time in working with them to ensure the policy is understood and leads to appropriate advertising.

I would like to thank our advertising partners, particularly Global and JCDecaux, and the Advertising Steering Group for their support over the last two years. We welcome their expertise and insights and will continue to work with them as we help London return to a more normal way of life.

If you have any views on our Advertising Policy, or even just on an advertisement you may have seen on our estate, please do get in touch.

'With one of the most valuable out-of-home advertising estates in the world, our unique environment helps provide immersive advertising and partnership opportunities that are captivating for our customers.'



Chris Macleod
Director, Customer & Revenue





The Advertising Steering Group advise on advertising policy across London

Message from the Chair

It is my pleasure to chair TfL's Advertising Steering Group. It's our job to oversee the implementation of the Advertising Policy and to provide an external and independent point of view on advertising policy related issues.

For example, over the last two years, we have reviewed the impacts of the policy changes around body image and, more recently have supported TfL with the policy for advertising food and drink high in fat, sugar or salt. In both cases we have seen how advertisements evolved for the better since the policy changes were introduced.

With its robust Advertising Policy that recognises London's incredible diversity, TfL makes it clear to advertisers what will be accepted on its advertising estate and works in collaboration with them to maintain the high standards for which the network is known.

I have also been particularly impressed with the work done by City Hall and TfL in developing the Diversity in Advertising competition. This competition, which has now run for two years, challenges stereotypes and aims to make advertising in London more representative of the city in which we live. London is one of the most diverse cities in the world and this competition encourages advertisers to reflect that.

The Advertising Steering Group meeting for March was postponed due to the current coronavirus pandemic. TfL, along with London, has had to deal with

an unprecedented situation and I have also been pleased to see the helpful communications coming from TfL to help support our city with advice on how to travel in these times.

I would like to thank the members of the Advertising Steering Group and the advisers from TfL and its advertising partners, for their input and support over the last few years. A special thank you goes to Lexian Porter, Member of the TfL Youth Panel and Whizz Kidz Youth member, Evelyn Asante-Mensah, former Commissioner for Equality and Human Rights Commission and Kim Sanders, Head of Media Engagement, for all their work on the Advertising Steering Group and a welcome to Jeff Ingold, Head of Media at Stonewall who will be taking Kim's place.

We will have an Advertising Steering Group meeting in the autumn and we will look at membership, as well as catch up on how the advertising estate has coped over the last few months.



Dr Mee Ling Ng OBE
Chair of the Advertising Steering Group

Continued innovation and growth

The two years covered by this report have been a very successful period for our advertising business





Driving growth through investment and innovation

The two years covered by this report have been a very successful period for our advertising business.

Through a combination of innovation, investment and a continued ability to adapt to the challenges inherent in such a dynamic environment, we saw continued revenue growth. It grew by £4m in 2018/19, to £156m and this trend continued into 2019/20 with revenues growing to £158.3m.

However, the impacts of coronavirus on advertising revenues started to be felt in March 2020 and unfortunately, this has limited further growth and created an uncertain future for this important income stream. We are working hard with our advertising sales agents and our own partnership teams to mitigate these impacts and develop our strategies for income recovery.

Since our last report, we have continued our investment in improving our digital advertising assets, especially on the London Underground network. This multi-million-pound investment has brought this estate – the most valuable ‘metro’ advertising network in the world – back up to a high standard, that is both appreciated and demanded by the advertising industry.

The £82.9m investment is nearing completion and had been paying dividends. We are especially pleased with some completely new formats that have been introduced at key stations such as the six large format landmark digital sites at strategic locations, as well as the digital ‘ribbons’ installed on escalators across seven sites.

The digital ribbons, which are a series of High Definition full motion landscape LCD screens that align against each other on both the left and right sides of main escalator runs, have won two industry awards: AV Awards Digital

Signage and Digital Out Of Home Project of the Year 2019 and The Drum Out of Home Innovation award 2019. They were originally designed for the Elizabeth line, and have been particularly popular at key London Underground locations such as Tottenham Court Road and Bank stations. They have provided a unique canvas for advertisers, who have created advertisements specifically for this format, illustrating the appetite the industry has for our innovations.

Underpinning our investment in assets has been our investment in data, with the development of different data products to better inform advertisers about the audiences they can reach.

Our segmentation data helps to inform advertisers about the types of people that use our network, including where they travel in London and at what times. All customer information is anonymised and grouped at a station level, so that no individual customer can be identified and

no data is shared directly with brands or advertisers. However, through this tool we can now prove to brands that their campaigns are being seen by the audiences that they want to connect with.

In 2019/20 we started to share with our sales partner Global aggregate footfall information based upon information from our Wi-Fi network. This data consists only of estimated numbers of people (for example, those walking past an advert at different times of the day), never of data related to individual journeys, but it provides useful insights into how people move across the network.

It helps us to position and sell possible locations for future advertising opportunities and also ensures we efficiently use our existing advertising assets. This data led approach has driven additional revenue for reinvestment into our transport network, with revenue from this particular activity growing by 19 per cent to £8.6m (gross) in 2019.



Rail innovations

Across our advertising estate we have supported new innovations over the last two years, resulting in some firsts for the Underground estate. In May 2018, following the development of a new screen-printing process by Global and their partners, strawberry scented posters filled Oxford Circus as part of a sensory brand experience to launch Beefeater Pink London Dry Gin. Scented posters have now been utilised on several occasions to build truly immersive brand experiences.

In 2019 we successfully ran three trials of advertising coupled with sound at the Waterloo travelator, starting with O2. In February 2020, we ran our first trial at King's Cross Station along a walkway to the Piccadilly line. British Airways partnered with us and added sound to their Caribbean holiday advertising.

We had positive feedback from customers and staff and this space is now available commercially to advertisers, albeit on a limited basis, as part of an extension to our commercial offering.

Bus shelter innovations

Working closely with our partner JCDecaux, we enabled an advertising campaign in October 2019 for two weeks to celebrate the launch of the new Adidas store in Oxford Street. The campaign featured included all 46 digital advertising screens along Oxford Street, as well as the installation of 'super-sized' Adidas shoes at the four bus shelters nearest to the new store.





Santander Cycles

2020 marks the 10 year anniversary of the Cycle Hire Scheme which has become a widely recognised symbol of our modern, cosmopolitan city. While we celebrate this, we also acknowledge the commercial partnerships that have been such a significant part of its success.

In 2010 our launch partnership with Barclays Bank Plc transformed sponsorship across the public sector and transport organisations, paving the way for greater interest and investment. In 2015 Santander took over the sponsorship, with increased investment in both the scheme and the customer experience, making it the largest public sector sponsorship globally.

This year we celebrate five years of partnership with them and can reflect on some of the achievements that our partnership has enabled, including the innovative new Blaze lighting across the fleet, the launch of a new bike model and the development and launch of the Santander Cycles app.

'We work closely with brands to build bespoke partnerships that utilise the best of our assets to generate fame for the brand and value for our customers.'



Harriet McDonald
Senior Category Manager

Working together for quality

Across our partnership activity, our strategy of working predominantly 'in-house' has paid off, by growing our income by 94 per cent in this last year, to a total of over £2.3 million. Our key focus over the last two years has been on increasing revenue by securing partnerships with a higher value and better quality.

This approach has resulted in a more efficient use of our resources, more appropriate to the scale and stature of our offer and enabled more sustainable revenue growth. As a result, we have been able to significantly improve the income, yield and quality of the activity across the estate. This has been a real success story for TfL, with our average day rate per station booking moving from £252 in 2017 to more than £3,000 in 2019.

These higher-quality, larger-scale campaigns generate significant levels of PR and social media coverage for brands, which positions TfL as a commercially astute organisation leading the public sector in terms of commercialising its assets and activities.

None of our work would be possible without the support and commitment of other teams within TfL as we are reliant on them to deliver the campaigns we generate. The station staff across London Underground are exceptional in their assistance, support and willingness to deliver a great experience for the client.

The next few pages are examples of advertising partnership activity over the last two years.



Our estate can provide a rich canvas for creativity

Picardilly Circus campaign

Our Commercial Partnerships team has continued to innovate, bringing investment to our network. This includes the renaming of Piccadilly Circus to Picardilly Circus to promote the launch of the new Star Trek series, Picard on Amazon Prime. This station name change sparked national coverage, as well as delighting our passengers – whether Trekkies or not – and netted TfL £284,000 for one day's activity.



PICARDILLY CIRCUS



STAR TREK
PICARD™

NEW SERIES | prime video
24 JANUARY



THE  TIMES
THE SUNDAY TIMES
Know your times



Times Newspapers – guiding Londoners through the Westminster Jungle

In October 2019, we supported The Times and The Sunday Times newspaper group to turn Westminster station into Westminster Jungle for 24 hours.

The campaign was aimed to help bring to life their message that The Times will guide the public through the political jungle.

We transformed all our internal and external roundels, themed the interior to look like a jungle. The cathedral like space in this station lent itself well to this brand activity.

With Westminster station being located right next to the Houses of Parliament, this campaign proved to become a topical, targeted station renaming. It achieved great media, political and social media attention.



Sony Pictures – Spider-Man was far from home in Oxford Circus

In partnership with Sony Pictures, in 2019 we were excited to create a one day publicity stunt in busy Oxford Circus Station to promote the release of the Spider-Man movie, Far From Home.

We themed our iconic roundels with spider web, had the Spider-Man character roaming the station, surprising and delighting our customers with his moves, distributing tickets for customers to see the film, and posing for selfies with them. Spider-Man also voiced one of our PA announcements.

The stunt was simple, but executed to a very high standard, creating visually compelling content generating over 1m social media impressions and was covered in the London and entertainment media.



Google Pay

Google Pay similarly took advantage of promoting their service at London Underground ticket gates, placing their brand on all 5,686 card readers. Starting in March 2020, this year-long activity will bring £1.5 million to TfL.

These unique activations create impact for brands, interest for customers and valuable revenue for our organisation.



Keeping our Advertising Policy relevant and effective

A clear and robust policy to deliver appropriate advertising across our estate





A sensitive approach to advertising regulation

Advertising on our network is governed by a specific TfL Advertising Policy, as well as the Codes of Practice which apply to all advertising nationally. From time to time we change the policy to reflect the evolving nature of advertising regulation. As a result, we have amended our policy and issued guidance to address issues such as body image, unhealthy foods, human rights and short term letting.

Following a Royal Brunei Airlines campaign that ran on our estate in early 2019 we received complaints that the government

of Brunei had adopted the death penalty for same-sex sexual acts. As a result, we reviewed how our Advertising Policy addresses campaigns from countries with poor human rights records and our advertising partners now refer to us for review all advertisements from, or relating to, countries on the International Lesbian, Gay, Bisexual, Trans and Intersex Association list and Brunei.

In September 2019 we also issued new guidance about short-term lettings advertising. This guidance addressed concerns from the public and London Assembly Members about companies

advertising on our estate encouraging landlords to breach planning laws and granting 'short term lettings' for more than 90 days a year without planning permission.

Lowering the promotion of fat, salt or sugar content in our advertising

On 25 February 2019, we amended our Advertising Policy to reflect the requirements of the Mayor's London Food Strategy, by introducing guidelines to restrict the advertising of foods and non-alcoholic drinks high in fat, salt and sugar across the entire TfL advertising estate. This included directly managed assets on London Underground, London Overground,

DLR, Victoria Coach Station, Croydon Tramlink and TfL bus shelters, as well as non-directly managed assets across London Buses and in taxis.

The basis of the restrictions are assessments using the Public Health England nutrient profiling model. The restrictions themselves do not 'ban' any specific brands or products from advertising on our network. However, the restrictions do apply to both the direct promotion of food and non-alcoholic drinks, as well as the indirect promotion or incidental use of food and non-alcoholic drinks in an advertisement.

‘As the long-term industry impacts of the coronavirus pandemic are understood we will be faced with new challenges.’



Chris Reader
Head of Commercial Media

Exceptions

As part of the implementation of the policy, we have also put in place an Exceptions process. Advertisers that have products that are deemed ‘unhealthy’ using the nutrient profiling model can seek to demonstrate that they have a negligible impact upon childhood obesity and if so, be permitted to advertise.

To support advertisers and their agencies, in June 2019 we published additional guidance to aid policy interpretation and the development of appropriate advertising copy.

It is not possible to directly quantify the financial impact of the new policy restrictions on our advertising revenue as there are a wide number of factors that affect advertising spend. For example, the budget a brand allocates for product advertising and the proportion of that spend allocated to outdoor advertising within London, as well as the wider advertising market and economic conditions.

While some brands have inevitably had some products restricted from advertising, we have also seen brands introduce ads for more healthy options and, year on year, our overall income from commercial advertising activity (before coronavirus) remained strong, with overall income rising by £2.3m between 2018/19 and 2019/20, to £158.3m.



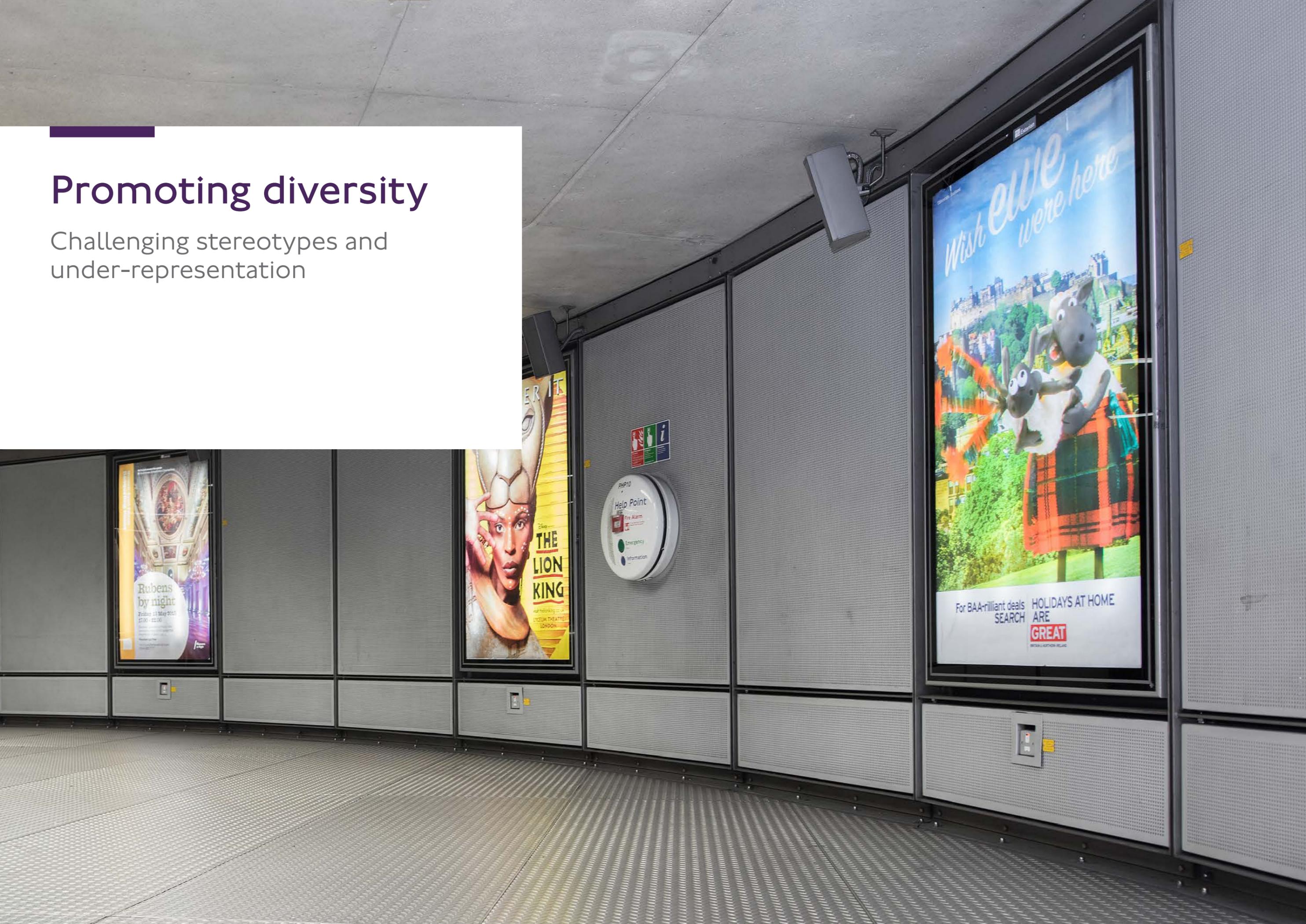
Helping campaigns comply

Since the implementation of the advertising restrictions for products high in fat, sugar or salt, we have received Exception applications for 81 products; 41 of these were accepted, 27 were rejected, 11 of those applications were for products that were submitted but, upon review by TfL did not require an exception as they were compliant, and for the remaining two we are currently awaiting further information.

We have rejected 28 advertisements for foods and non-alcoholic drinks high in fat, salt and sugar and a further 16 advertisements where foods high in fat, sugar or salt were used incidentally. However, it is worth noting that even though we declined a number of advertisements, many of the advertisers went on to submit alternative ads as part of their campaign or worked with us to amend their copy so that their campaigns could run across our network.

Promoting diversity

Challenging stereotypes and under-representation



Challenging stereotypes and under-representation

In July 2018, working with the Mayor's office, we launched the 'Women We See' advertising competition.

Sponsored by our media partners, Global (at that time called Exterion Media) and JCDecaux, the competition called on brands and their agencies to create adverts that reflected London's diversity, with a particular focus on women from all backgrounds and move away from harmful gender stereotypes.

The winner was Holland & Barrett's 'Me. No. Pause' campaign, which was chosen due to its positive representation of women going through the menopause and focus on a major issue for women rarely until now featured in mainstream advertising.

They received £500,000-worth of prominent advertising space from Exterion and JCDecaux across our network, including space on the high value digital screens at Canary Wharf.



2018 Diversity in Advertising competition winner



2019 – a focus on authentic black, Asian and minority ethnic representation

In October 2019, encouraged by the success of our inaugural event, we launched our second Diversity in Advertising competition, again working with our media partners, JCDecaux and Global. Research carried out by Lloyds Banking Group in 2018 revealed that 34 per cent of black people and 30 per cent of people from mixed ethnic backgrounds felt they were inaccurately portrayed in advertising.

This informed our theme which was to encourage authentic portrayals of people from our black, Asian and minority ethnic communities with realistic depth and resonance. The work also needed to reflect the diversity within groups as well as between them.

The winner was Nubian Skin, a small business that creates 'nude' underwear for all skin tones. In March 2020 their campaign appeared across our network in digital advertising space again worth £500,000 and we, along with the GLA and Nubian Skin received significant coverage in both national and international media.

Advertising Steering Group

Ensuring our Advertising Policy remains relevant

The Advertising Steering Group was established in 2016 by direction of the Mayor to guide and inform the development of the TfL Advertising Policy. Since it was set up the Group has met regularly and reviewed a wide range of topics.

Its initial focus was overseeing the implementation of the policy changes introduced by the Mayor around body image and it has noted the reduction of problematic copy in this area.

It also reviews the range and number of complaints received and provides regular comment and insight.

Members were updated on the advertising restrictions for products high in fat, sugar and salt that were announced in October 2018 and have also been regularly briefed on the progress of the Diversity in Advertising competitions.

Due to coronavirus, meetings of the Advertising Steering Group were postponed but it was scheduled to meet in September 2020 and has reviewed the contents of this report. The Advertising Steering Group will continue to be an important forum in the management of our advertising estate and agendas, minutes and materials will be published at tfl.gov.uk/info-for/business-and-commercial/commercial-media

Membership group



Dr Mee Ling Ng
TfL Board Member
(Chair)



Heidi Alexander
Deputy Mayor
for Transport



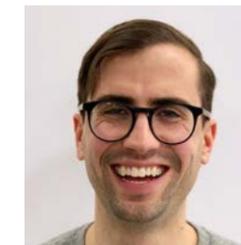
Leah Kreitzman
Mayoral Director
for External and
International Affairs



Dr Philippa Diedrichs
Professor of
Psychology,
University of
West England



Tom Knox
Chairman of
MullenLowe
and former President
of the Institute of
Practitioners in
Advertising (IPA)



Jeff Ingold
Head of Media,
Stonewall

Facts and figures – 2018/19

A summary of advertising for 2018/19

20,417
advertisements were carried on our network

547

complaints were received directly from our customers



41

advertisements were rejected



13

advertisements were the subject of complaints to the ASA

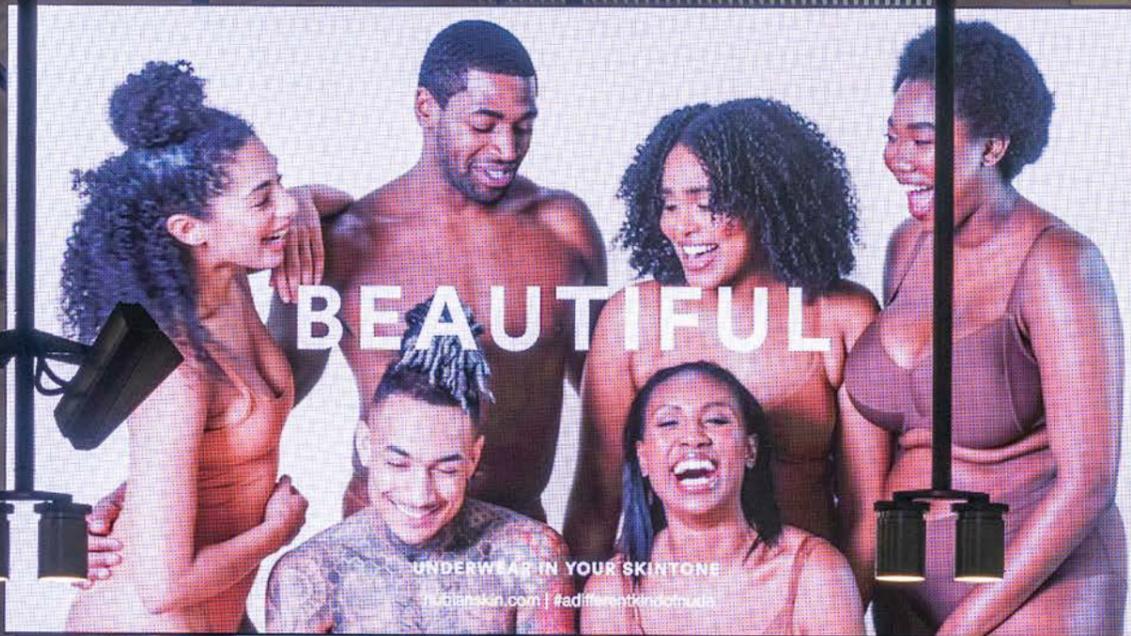


7

of these ASA complaints were upheld



Our advertising is seen by people all across London



Facts and figures – 2019/20

A summary of advertising for 2019/20

23,712

advertisements were carried on our network

364

complaints were received directly from our customers



75

advertisements were rejected



14

advertisements were the subject of complaints to the ASA



6

of these ASA complaints were upheld



Advertising categories

A breakdown of advertising run by market sectors

Top three advertising categories 2019/20



- 1** Entertainment and leisure
5,895
- 2** Retail
2,473
- 3** Government, social and political
2,293

Category	Number of advertisements 2018/19	Number of advertisements 2019/20
Business and industrial	1,169	1,676
Clothing and accessories	1,025	982
Computers	551	858
Cosmetics and toiletries	425	754
Drink	908	1,040
Entertainment and leisure	4,532	5,895
Finance	1,063	1,336
Food	374	351
Games and consoles	98	108
Gardening and agriculture	4	9
Government, social and political	2,201	2,293
Household appliances	231	390
Household equipment	239	188
Household stores	53	44
Leisure equipment	195	215
Mail order	230	234
Media	896	487
Miscellaneous	690	984
Motors	232	443
Multi advertisers	6	4
Office equipment and supplies	40	61
Online shopping	174	221
Pharmaceutical	359	430
Property	697	668
Recruitment	24	38
Retail	2,446	2,473
Telecoms	390	327
Tobacco and accessories	18	22
Travel and transport	1,147	1,181

Complaints

A breakdown of the complaints we received

These complaints covered a wide range of topics, and can be summarised as falling into the following very broad categories:

- Political
- Ethical
- Religious
- Sexual

It is worth noting that a small number of specific advertisements tend to generate the bulk of the complaints in any year and overall, we receive a very small number of complaints given the very large number of campaigns and individual advertisements we run on the estate.

Advertisement	Number of complaints 2018/19
The People's Vote	162
MJInnocent.com	157
For The Love of Allah	45
Northern Cyprus Holidays	15
Boohoo	13
McDonalds	10
Ramadan	10
Royal Brunei Airlines	9
Royal Carribean	8
Pretty Little Things	7
Jordan Peterson	5
Muzmatch	4
Burger King	3
London Dungeons	3
Magic Mike	3
Nasty Gal	3
Living Vegan	3
Erectile Dysfunction	3
Go Vegan World	3
BAE Systems	2
Beyond Life	2
The First Purge	2
HM Government Hate Crimes	2
Body Worlds	2

Advertisement	Number of complaints 2018/19
HIV	2
Black Mirror Bandersnatch	2
#F Your Fetish	2
Lexus	2
Victoria's Secrets	2
Floradix	1
Man of La Mancha	1
Deliveroo	1
KFC	1
Tinder	1
Pet Semetary	1
Asian Single Solution	1
Slenderman	1
Snowflake	1
Sunny	1
Bulldog	1
Switch to Super	1
Vauxhall	1
Venom	1
Killing Eve	1
Viva.org.uk	1
Kraken Rum	1
Primera Air	1
Mariah Carey	1

Advertisement	Number of complaints 2018/19
All I Want For Christmas	1
Metropolitan Police	1
Recommended by Mums	1
IESO Digital Health	1
Beefeater Pink Gin	1
Greggs	1
Bodyworks	1
Get Eddie	1
Adidas	1
Ali Baba & His 40 Thieves	1
Pow Wow Now	1
Every Love Matters	1
Diamond Mist	1
Santander	1
British Transport Police	1
Etoro.com	1
Costa Coffee	1
Playstation	1
Amazon Music	1
Local Refurbished Accommodation	1
Natural History Museum	1
Clarks	1
Not known	20
Total complaints	547

Advertisement	Number of complaints 2019/20
Royal Brunei Airlines	11
Northern Cyprus Holidays	33
Hostmaker	16
Kapten Taxi App	12
Monday.com	11
Burger King	8
McDonalds	8
The People's Vote	6
Annabel Comes Home	6
Christian Aid	5
#SongKranFestival	5
KFC	5
Nestify	5
Deliveroo	4
ANIMA	4
BAE Systems	4
Just Eat	3
LGBT	3
Gym Box	3
EU Election	2
Tinder	2
Thriller	2
Pretty Little Things	2
Nasty Gal	2

Advertisement	Number of complaints 2019/20
DJ Semtex	2
Napapjiri	2
Innokin	2
JUULvapor	2
Coca-Cola	2
Football Index	2
Loveitcoverit	2
Vitabiotics	2
Animal Aid	2
Lucozade	1
Soylent.com	1
#UberEats	1
Extremely Wicked	1
Hustle	1
Mo Farah	1
Dettol	1
L'Oreal	1
Equinor	1
Assasination Vacation	1
Freshworks	1
ERS Publications	1
Pet Semetary	1
London Dungeons	1
Magic Mike	1

Advertisement	Number of complaints 2019/20
Viva.org.uk	1
British Transport Police	1
Simply Be	1
Joker	1
Borderlands 3	1
Habito	1
Sky One	1
KFC	1
Charlie's Angels	1
#NATO	1
Tesco	1
Knives Out	1
Hugo Boss	1
Picard	1
Made.com	1
Domino's	1
Marsh & Parsons	1
Superdrug	1
Nando's	1
Twitter	1
Richard Dawkins Novel	1
On The Beach	1
Govegan.i.e.	1
Viagra	1

Advertisement	Number of complaints 2019/20
Etihad Airline	1
Barbican	1
Specsavers	1
CrisisLink	1
Chiquita	1
Temptation Island	1
Happy Death Day	1
FOA	1
Hula Hoops	1
Jungle Formula	1
Missguided	1
Trebor	1
Futurefinance.com	1
Not known	32
Total complaints	364

ASA complaints

A summary of the complaints raised with the Advertising Standards Authority

TfL only checks the advertising it runs for compliance with its own Advertising Policy. In keeping with the voluntary regulatory framework for advertising in the UK it is the responsibility of the advertiser and their agents to ensure that the ads they provide are 'Legal, Decent, Honest and Truthful' and comply with the appropriate general Codes of Advertising Practice. The general public is therefore free to complain to the Advertising Standards Authority (ASA) as well as TfL about any ad it sees on our network.

For the sake of openness and completeness we therefore also report on the number of complaints received by the ASA about ads on the TfL estate.

In 2018/19 they received complaints about 13 advertisements that ran on our network and of these seven were upheld.

In 2019/20 the total was 14 complaints, with six being upheld.

As with the complaints received directly by TfL, this represents a very small number of complaints in relation to the large number of ads we carry.

A summary is provided here and further information about these rulings can be found on the ASA website at www.asa.org.uk.

2018/19 – ASA Complaints Advertiser	Result of appeal
Babylon Healthcare	Not upheld
I Heart Wine	Upheld
Puressentiel	Upheld
On the Market	Not upheld
Tepe Oral Hygiene	Not upheld
Boots	Not upheld
Dextro Energy	Upheld
McDonalds	Upheld
Notting Hill Genesis	Upheld
Riverford	Not upheld
Red Bull	Upheld
Plenish	Not upheld
Mondelez UK	Upheld

2019/20 – ASA Complaints Advertiser	Result of appeal
British American Tobacco	Not upheld
KFC	Upheld
Man Cave	Not upheld
Numan	Upheld
Pet Sematary	Not upheld
Emma Mattress	Not upheld
PounceBet	Not upheld
Imperial Tobacco Ltd	Not upheld
Diamond Mist	Upheld
Top Cash Back	Upheld
Missguided	Not upheld
Stubhub	Upheld
Hugo Boss	Not upheld
People Hour	Upheld

Campaigns declined

Advertising needs to be appropriate for all our customers

The authority to accept or decline campaigns is generally delegated to our advertising sales agents, who use our published Advertising Policy as guidance. Every year they review in the order of 35,000 advertisements. In a small number of cases they refer ads to us for further review.

Of those advertisements referred to us for a final decision, we declined 41 in 2018/19 and 75 in 2019/20. Some advertisements were turned down for multiple reasons. In many cases, particularly for ads for foods and non-alcoholic drinks high in fat, salt and sugar, alternative ads were subsequently submitted and accepted to run.

More details about the reasons for declining ads is provided in the accompanying table, which refers to the relevant clauses of the TfL Advertising Policy, see also: tfl.gov.uk/info-for/business-and-commercial/commercial-media on the commercial media page

Reason for rejection	2018/19 Frequency	2019/20 Frequency
2.3(a) Likely to cause widespread offence or serious offence to reasonable members of the public	1	4
2.3(b) Depicts adults or children in a sexual manner or displays nude or semi-nude figures in overtly sexual context	2	3
2.3(c) Could reasonably be seen as distasteful, indecent or obscene	1	1
2.3(d) Could reasonably be seen as likely to cause pressure to conform to an unrealistic or unhealthy body shape	1	4
2.3(f) Depicts direct or immediate violence to anyone shown in the advertisement or could reasonably be seen as condoning, inciting or provoking crime, violence or anti-social behaviour	0	2
2.3(h) Contains images or messages which relate to matters of public controversy or sensitivity.	1	1
2.3(j) Contains negative references to TfL's services, or those services provided or regulated by other members of the GLA Group	4	1
2.3(p) Promotes food or non-alcoholic drink which is high in fat, salt and/or sugar ('HFSS' products),	0	44
2.3(q) Unacceptable for some other substantial reason (which TfL will identify and explain as reasonably required)	2	8



Contact us

To send feedback or to complain about an advertisement, visit tfl.gov.uk

Call our 24-hour contact centre on
0343 222 1234

Or write to:

TfL Customer Services
4th Floor
14 Pier Walk
London SE10 0ES

About Transport for London (TfL)

Part of the Greater London Authority family led by Mayor of London Sadiq Khan, we are the integrated transport authority responsible for delivering the Mayor's aims for transport.

We have a key role in shaping what life is like in London, helping to realise the Mayor's vision for a 'City for All Londoners' and helping to create a safer, fairer, greener, healthier and more prosperous city. The Mayor's Transport Strategy sets a target for 80 per cent of all journeys to be made by walking, cycling or using public transport by 2041. To make this a reality, we prioritise sustainability, health and the quality of people's experience in everything we do.

We run most of London's public transport services, including the London Underground, London Buses, the DLR, London Overground, TfL Rail, London Trams, London River Services, London Dial-a-Ride, Victoria Coach Station, Santander Cycles and the Emirates Air Line. The quality and accessibility of these services is fundamental to Londoners' quality of life. By improving and expanding public transport and making more stations step free, we can make people's lives easier and increase the appeal of sustainable travel over private car use.

We manage the city's red route strategic roads and, through collaboration with the London boroughs, we are helping to shape the character of all London's streets. These are the places where Londoners travel, work, shop and socialise. Making them places for people to walk, cycle and spend time will reduce car dependency, improve air quality, revitalise town centres, boost businesses and connect communities. As part of this, the Ultra Low Emission Zone scheme and more environmentally friendly bus fleets are helping to tackle London's toxic air.

During the coronavirus pandemic we have taken a huge range of measures to ensure the safety of the public. This includes enhanced cleaning using hospital-grade cleaning substances that kill viruses and bacteria on contact, alongside regular cleaning of touch points, such as poles and doors, and introducing over 1,000 hand sanitiser points across the public transport network.

Working with London's boroughs we have also introduced Streetspace for London, a temporary infrastructure programme providing wider pavements and cycle lanes so people can walk and cycle safely and maintain social distancing.

At the same time, we are constructing many of London's most significant infrastructure projects, using transport to unlock much needed economic growth. We are working with partners on major projects like the extension of the Northern line to Battersea, Barking Riverside and the Bank station upgrade.

Working with Government, we are in the final phases of completing the Elizabeth line which, when open, will add 10 per cent to central London's rail capacity. Supporting the delivery of high-density, mixed-use developments that are planned around active and sustainable travel will ensure that London's growth is good growth. We also use our own land to provide thousands of new affordable homes and our own supply chain creates tens of thousands of jobs and apprenticeships across the country.

We are committed to being an employer that is fully representative of the community we serve, where everyone can realise their potential. Our aim is to be a fully inclusive employer, valuing and celebrating the diversity of our workforce to improve services for all Londoners.

We are constantly working to improve the city for everyone. This means using data and technology to make services intuitive and easy to use and doing all we can to make streets and transport services accessible to all. We reinvest every penny of our income to continually improve transport networks for the people who use them every day. None of this would be possible without the support of boroughs, communities and other partners who we work with to improve our services.

By working together, we can create a better city as London recovers from the pandemic and moves forward.

© Transport for London

August 2020

tfl.gov.uk