



# Advertising policy

June 2016

MAYOR OF LONDON



**TRANSPORT  
FOR LONDON**  
EVERY JOURNEY MATTERS

### **About Transport for London (TfL)**

We are the integrated transport authority for London. Our purpose is to keep London moving, working and growing, and to make life in our city better. We reinvest all of our income to run and improve London's transport services.

Our operational responsibilities include London Underground, London Buses, Docklands Light Railway (DLR), London Overground, TfL Rail, London Trams, London River Services, London Dial-a-Ride, Victoria Coach Station, Santander Cycles and the Emirates Air Line.

On the roads, we regulate taxis and the private hire trade, run the Congestion Charging scheme, manage the city's 580km red route network, operate all of the Capital's 6,300 traffic signals and work to ensure a safe environment for all road users.

We are delivering one of the world's largest programmes of transport capital investment, which is building the Elizabeth line, modernising Tube services and stations, transforming the road network and making it safer, especially for more vulnerable road users, such as pedestrians and cyclists.

We are a pioneer in integrated ticketing and providing information to help people move around London. Oyster is the world's most popular smartcard, and the rise in contactless payment is making travel ever more convenient. Real-time travel information is provided directly by us and through third party organisations, which use the data we make openly and freely available to power apps and other services.

Improving and expanding transport in London is central to driving economic growth, jobs and housing across the country.

# Principles

## Introduction

Our advertising estate is unique and is one of the transport network's defining features. It is the most valuable out of home advertising estate in the world and it provides advertisers with access to a huge and diverse audience. It also brings great benefits to us and our customers by enhancing journey experience and delivering revenues to reinvest in the transport network.

There are 30 million journeys on our transport network every day and our advertising estate covers almost every aspect of that network through a wide range of channels.

The diversity of our audiences is vast covering every age (including children), gender, sexual orientation, religion, language, heritage, economic background and interest. Our 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.

That scale and diversity means we must be considerate and responsive to the type of advertising our customers want and expect to see and we have a clear set of guidelines so advertisers and brands can understand those expectations.

We want to support and encourage great advertising, with content which engages our customers and enhances the transport environment. To do that we are committed to working with brands, agencies and our customers to get the balance right. This document sets out how we will work in partnership to achieve that.

## Consumer and market engagement

The diversity of our audience, the complexity of our estate and our desire to see quality and engaging advertising means we take a unique approach to market engagement. Our approach with consumers and advertisers is based on three very clear values – transparency, accountability and responsibility.

We expect advertisers to share our values and we want our network to carry the very best advertising, which informs and delights our customers. To achieve this we believe in having constructive and collaborative dialogue with advertisers. We, and our partners review each piece of copy submitted to us. We consider both the content of the advertisement and where it is placed on our network. Where we do not believe a piece of advertising meets our guidelines, we, along with our Media Partners, work with the brand or agency to help them improve their content. This requires all parties to work together to find the right solution for our customers and estate.

Not all advertisers will enter dialogue with us or be responsive to amending their content. In these situations we may take the very unusual step of refusing to carry a piece of advertising. We do not do this lightly, but we have to protect the integrity of our estate.

To ensure we are able to hear the views of our customers, we aim to provide a clear and transparent complaints procedure to ensure that consumers can voice their concerns if they believe advertising does not meet the standards they believe appropriate.

Our transparent approach will be supported through the publication of an annual review of our advertising estate to provide an overview of how it has performed, the numbers and types of advertising which have run on our network, and the complaints that we have received.

Ultimately we believe in a dialogue with advertisers and our customers. London shapes the advertising market, both in the UK and beyond. We have a hugely important role to play, and one that can only be fulfilled through ongoing engagement.

### **Aspirations**

Our unique customer base and estate means we can and should facilitate great advertising. To that end we aspire to carry advertising which is engaging, enhances our customers' journey experience, is responsible and respectful, and is sensitive to time, location and events.

We also aspire to ensure we don't carry advertising which is offensive, insensitive, promotes violence, hate, intolerance or inequality, or is purposefully controversial.

# Guidelines

## 1. Background

- 1.1 The purpose of this policy is to set out high level principles and procedures relating to the approval of advertisements which appear on services run or regulated by Transport for London (TfL).
- 1.2 The application of the principles will depend on context and will sometimes require subjective judgments.
- 1.3 The regulation of advertising in the UK is the responsibility of the Advertising Standards Authority (ASA). The ASA applies the Advertising Codes which are written by the Committees of Advertising Practice (CAP).
- 1.4 Advertisements carried on services run or regulated by TfL (including campaigns on behalf of TfL) should not conflict with the required standards outlined below, which supplement the requirements of the Advertising Codes.

## 2. Required standards for approval of advertisements

- 2.1 TfL roundels or other intellectual property owned by TfL may only be used in accordance with any further guidelines and/or licensing system which may be in place.
- 2.2 Individual TfL services may specify and apply further requirements in relation to advertising on those services.

- 2.3 An advertisement will not be approved for, or permitted to remain on, TfL's services if, in TfL's reasonable opinion, the advertisement does not comply with the law, does not comply with the UK Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing (or any relevant CAP code), is not socially appropriate, or is inconsistent with TfL's obligations under section 149 of the Equality Act 2010 (the Public Sector Equality Duty). More particularly, an advertisement will be unacceptable if:

- (a) it is likely to cause widespread or serious offence to reasonable members of the public on account of the product or service being advertised, the content or design of the advertisement, or by way of implication. Advertisements which are consistent with TfL's Public Sector Equality Duty, such as those which promote tolerance, or discourage prejudice, will not however normally be disapproved on the ground that they might cause offence;
- (b) it depicts adults or children in a sexual manner or displays nude or semi-nude figures in an overtly sexual context. (While the use of underdressed people in, for example, underwear advertising, may be appropriate, gratuitous use of images of an overtly sexual nature will be unacceptable.);
- (c) it could reasonably be seen as distasteful, indecent or obscene, in its use of imagery, language or otherwise;

- (d) could reasonably be seen as likely to cause pressure to conform to an unrealistic or unhealthy body shape, or as likely to create body confidence issues particularly among young people;
- (e) it relates to lap-dancing, 'gentlemen's clubs', escort agencies, massage parlours, or unproven health and weight loss products;
- (f) it depicts direct or immediate violence to anyone shown in the advertisement; or could reasonably be seen as condoning, inciting or provoking crime, illegality, violence, or anti-social behaviour;
- (g) it relates to films which have not been granted permission for public exhibition or which do not show the British Board of Film Classification certificate;
- (h) it contains images or messages which relate to matters of public controversy or sensitivity. Advertisements which are calculated to promote tolerance, discourage prejudice, or are consistent with TfL's Public Sector Equality Duty, advertisements which are calculated to promote the right to life, liberty and security of the person, and advertisements which reasonably promote causes which are not party political, will however not normally be disapproved on this ground;
- (i) it refers to or portrays (or gives the impression of portraying) a living person. TfL requires an indemnity against any action by that person, or on that person's behalf, before such references or portrayals will be accepted. This does not apply to a person who is a professional performer, model or similar, unless there is reason to doubt their consent;
- (j) it contains negative references to TfL's services, or those services provided or regulated by other members of the GLA Group, or might bring TfL or other members of the GLA Group into disrepute;
- (k) it is likely to be defaced, for example due to the subject matter or the inclusion of a high proportion of blank space;
- (l) it uses handwriting or illustrations that suggest the advertisement has been damaged, defaced, fly posted or subject to graffiti, after it has been posted;
- (m) it may adversely affect in any way the interests of the site owner, TfL or any member of the GLA Group;
- (n) it promotes a party political cause or electioneering. Advertisements must conform to TfL's policy on use of resources, with particular care exercised in pre-election periods;
- (o) it is digital, and may pose a health and safety risk as a result of flickering or other visual imagery;
- (p) it is unacceptable for some other substantial reason (which TfL will identify and explain as reasonably required).

# Administration

## 3. Definitions

- (a) **Advertisement** includes advertisements in any form proposed to appear on TfL's services, and includes information campaigns undertaken by TfL.
- (b) **The GLA Group** means the Greater London Authority, TfL, the Mayor of London, the London Assembly, the London Legacy Development Corporation, the Mayor's Office for Policing and Crime, the London Fire and Emergency Planning Authority and Old Oak and Park Royal Development Corporation (OPDC).
- (c) **TfL's services** means services properties and facilities operated by or on behalf of TfL or regulated by TfL on which TfL has a right to approve advertisements, including but not limited to:
  - (i) London Underground;
  - (ii) London Buses;
  - (iii) London Rail and any rail subsidiaries of TfL;
  - (iv) London Trams;
  - (v) London's roads for which TfL is responsible;
  - (vi) Taxi and Private Hire;
  - (vii) London River Services;
  - (viii) Victoria Coach Station;

(ix) London Transport Museum;

(x) The cable car;

(xi) Any cycle hire schemes; and

(xii) Dial-a-Ride.

## 4. Decision to approve or not accept advertising

- 4.1 A decision as to acceptance of an advertisement shall be the responsibility of a person given or permitted authority by TfL to make such decisions.

## 5. Approval and amendment

- 5.1 This policy is approved by the Commissioner.
- 5.2 This policy will be subject to review as considered necessary by the Marketing Director.

Approved by the Commissioner  
Mike Brown MVO  
Date : 13 June 2016





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