

Annual Advertising Report

2016/17

MAYOR OF LONDON



**TRANSPORT
FOR LONDON**
EVERY JOURNEY MATTERS

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'. We are committed to creating a 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 on foot, by cycle or using public transport by 2041. To make this a reality, we prioritise health and the quality of people's experience in everything we do.

We manage the city's 'red route' strategic roads and, through collaboration with the London boroughs, can help 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 and improve air quality, revitalise town centres, boost businesses and connect communities.

We run most of London's public transport services, including the London Underground, London Buses, the Docklands Light Railway, 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, we can make people's lives easier and increase the appeal of sustainable travel over private car use.

We are moving ahead with many of London's most significant infrastructure projects, using transport to unlock growth. We are working with partners on major projects like Crossrail 2 and the Bakerloo line extension that will deliver the new homes and jobs London and the UK need. We are in the final phases of completing the Elizabeth line which, when it opens, will add 10 per cent to 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 freezing fares so everyone can afford to use public transport, 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 that 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. We all need to pull together to deliver the Mayor's Transport Strategy; by doing so we can create a better city as London grows.

Contents

4	Foreword
7	Message from the Chair of the Advertising Steering Group
8	Our advertising estate
10	Transforming our advertising estate
12	The Advertising Policy
14	The Advertising Steering Group
16	Facts and figures
17	Advertising categories
18	Complaints
19	Appeals
20	Rejections
22	Contact us

Foreword



Commercial advertising has always been a defining feature of our stations, trains and bus network. It is almost as much a part of London as the transport network itself. And it serves a dual purpose. For advertisers, it sells goods and services and promotes campaign messages. For us, through reinvestment of the income we receive, it helps cover the cost of running one of the most integrated transport networks in the world.

Carrying advertising places significant obligations on us. Our estate is different from TV, online or print. No one can 'switch off' the advertising in a Tube carriage or on the side of a bus. So the unique and extensive nature of our network means that we must work in very close partnership with the industry, customers and many others to ensure that advertisements are appropriate for a global and highly diverse city.

This, our first Annual Advertising Report, reflects on what has happened over the course of the year to shape our approach towards the 16,000 advertisements we have

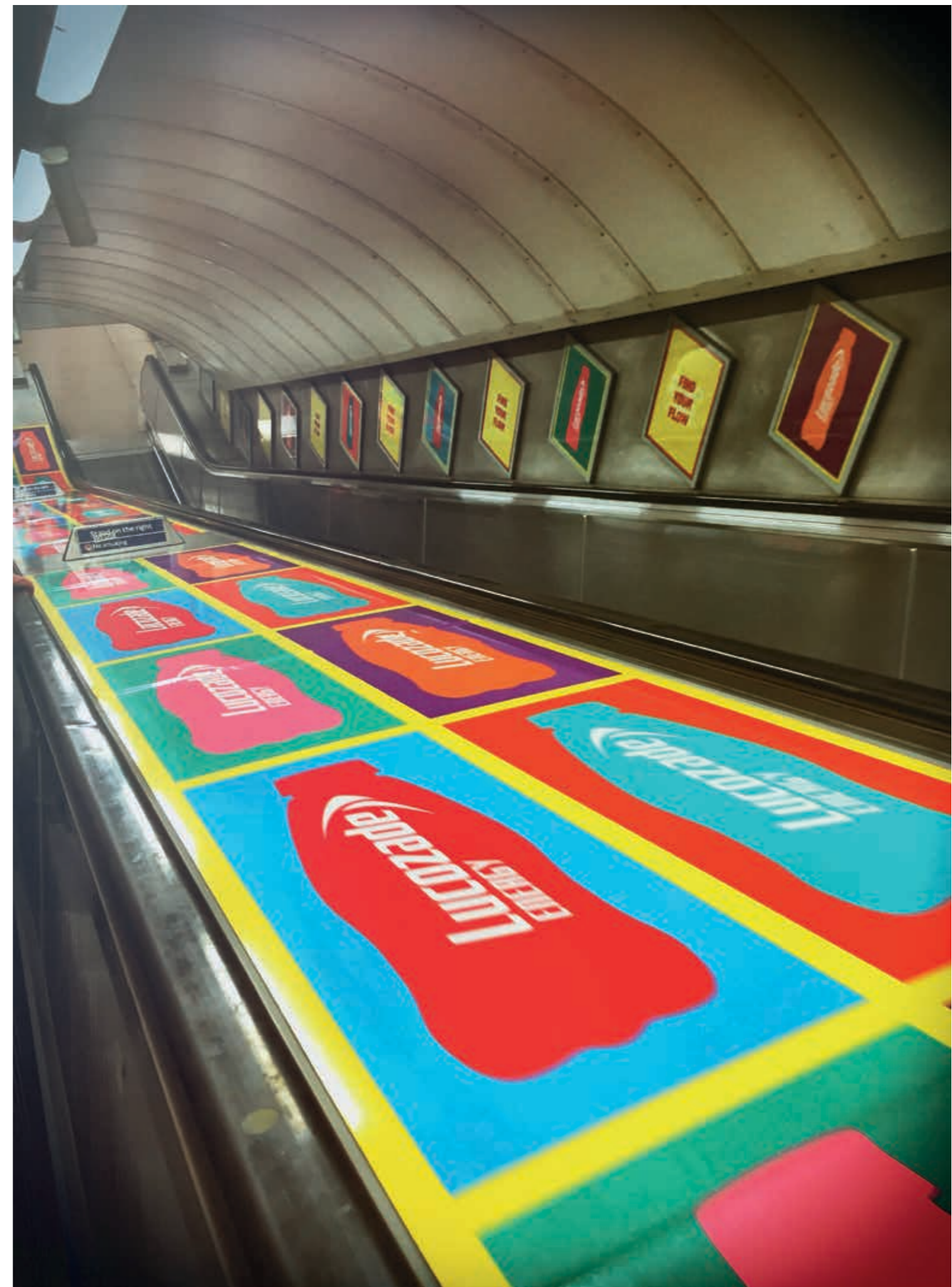
carried. It contains information on the number of complaints we have received and the number of advertisements we have rejected and for what reasons.

The relatively low number of complaints we receive and the few occasions when we are forced to reject specific advertisements reflect the careful approach we take to working with advertisers to help them meet the requirements of our Advertising Policy. Where we believe that advertisements fail to comply, we provide early feedback to see if changes can be made. As a result, we rejected just 23 advertisements, demonstrating the value of this open and proactive approach. Sixty-one advertisements were accepted after we worked with advertisers to amend and improve the copy.

We and our partners acted quickly on the commitment made by Mayor of London, Sadiq Khan, to update our policy to deal with unrealistic expectations surrounding body image. A new Advertising Steering Group, chaired by Dr Mee Ling Ng, has provided advice and guidance on the implementation of this and other wider elements of our Advertising Policy. The wise counsel and insights of the Group have been invaluable.

I would like to thank our advertising partners, advertisers and the Advertising Steering Group for helping us shape what a modern advertising estate should look like for London.

Vernon Everitt
Managing Director, Customers,
Communication & Technology





Message from the Chair

I was delighted that the Mayor of London first appointed me to the TfL Board and then to Chair the Advertising Steering Group. It is a pivotal time for TfL as it must balance a new financial landscape while ensuring that it continues to provide a world-class service and experience for its customers. For advertising, this means TfL must generate significant revenues to reinvest in the transport network while ensuring that advertising is not offensive, insensitive, does not promote violence, hate, intolerance or inequality, and is not purposefully controversial.

The Advertising Steering Group has an important role to play in providing feedback and recommendations to TfL. The diversity of London is its strength and I hope that the Advertising Steering Group is one that represents all Londoners. We are always better when we listen to the experience of others and I am glad that TfL shows a commitment to coming around the table to discuss advertising on its network.

Part of TfL's aim, Every Journey Matters, is to involve customers in its decisions and listen to their views. That is why I am glad that TfL is publishing its first Advertising Report and that TfL publishes the agendas and briefing packs from the Advertising Steering Group on its Commercial Media webpage. I have seen from the Advertising Steering Group that TfL really does read every comment that you send in, so please get in touch with your thoughts regarding advertising or any other aspect of your journey.



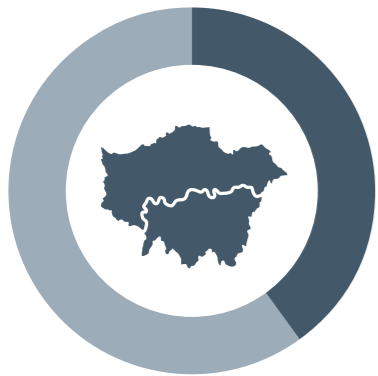
We have had some robust discussions and covered a number of issues for which there is often no easy answer. There is an acceptance that sometimes decisions are subjective as to whether advertisements are acceptable and I am grateful for the expertise that members have shown in our meetings. I would like to thank the members of the Advertising Steering Group and the advisors from TfL and their advertising partners for their work. The Advertising Steering Group has observed an updated Advertising Policy that is working well overall and I look forward to members continuing to provide guidance to TfL in the coming years.

Dr Mee Ling Ng
Advertising Steering Group, Chair

Our advertising estate

One of the most valuable advertising estates in the world

40%



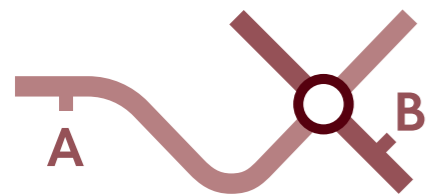
of London's outdoor advertising by value is owned by TfL

15% ▲

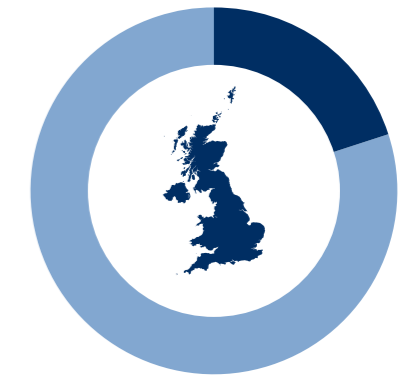
growth in digital outdoor advertising spending per year means it is set to overtake traditional outdoor advertising by 2020 (source: PwC)

31m

journeys each day



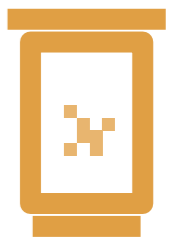
20%



of the UK's outdoor advertising by value is owned by TfL

500

digital screens have been installed at our bus shelters



60%



of Tube customers find advertising a welcome distraction (source: Exterior Media)

55m

customer see our Hello London Icons screens at Canary Wharf Tube station each year

Transforming our advertising estate

Together with our advertising partners, we are transforming our advertising estate to generate revenues to reinvest in the transport network. In the financial year 2016/2017, we generated £142.1m from commercial advertising.

In October 2016, we launched Hello London, a media partnership with Exterior Media. The eight-year partnership will bring investment and innovation to advertising on London Underground, London Overground, London Trams, Docklands Light Railway, Victoria Coach Station and, once operational, the Elizabeth line. As part of this, we have installed two new large format digital advertising screens at Canary Wharf Tube station and will be investing in more of these and other digital screens across our estate. The partnership will generate £1.1bn, which will be invested in our transport services.

Exterior Media launched its Engagement Zone study in July 2016 which showed how our customers value advertising as part of their journey and how brands can connect to their audience meaningfully. The study found that six in 10 customers find advertising on the Tube a welcome distraction, making it an active and beneficial part of the transport environment for brands and customers alike.



JCDecaux holds our bus shelter advertising contract. In February 2017, the company celebrated installing 500 digital screens on our bus shelter network – halfway towards its 1,000 target. The contract, which began in 2015, will bring in at least £300m over eight years. We also worked with JCDecaux on the updated Wandsworth Roundabout advertising superstructure, which went live in September 2016.

We are also working with other advertising companies to bring forward further advertising sites around London. While it is important to deliver high-quality sites in good locations, we also hope to encourage positive advertising campaigns. The Game of Thrones experiential event in July 2017 with Sky Atlantic is such an example. The Iron Throne was transported to the Northern line ticket hall at King's Cross Tube station to promote the latest series of the show, giving customers a fun photo opportunity. The entire ticket hall was decked out in immersive advertising, buskers entertained, station announcements were re-recorded and costumed actors helped to recreate the world of Game of Thrones.

Together with our advertising partners, we will continue to invest in our advertising estate and bring our customers engaging advertising campaigns and experiential events over the coming year.

The Advertising Policy

The Advertising Policy sets out the standards that will be required on our estate, and is used by us and our advertising partners. The Advertising Policy applies equally to us and our own advertising as it does to commercial brands. It promotes a collaborative approach to developing the advertisements that appear on our system. Our intention is to encourage the production of advertising content that reflects the multi-cultural and inclusive nature of London and enhances the value and perceptions of our advertising assets.

The Mayor of London asked us to update our Advertising Policy following his election in May 2016 to ensure all advertising on our network is appropriate; with special emphasis on addressing body image in advertising. This updated policy was introduced in July 2016 with a new clause so that advertisements would not be accepted 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 amongst young people'.

The policy does not seek to prohibit categories of advertising except in specific cases. While it is now clearer on issues including body shaming, it also allows for a wider range of political advertising. For instance, previously all advertising of political causes was unacceptable, but the revised policy only rules out party political advertising or electioneering.

Copy approvals process

We do not want to become a censor, but we have an important responsibility to our customers to ensure that advertising on the transport network is appropriate.

We have a robust approvals process that starts with our advertising partners. Exterior Media and JCDecaux are our two largest partners and we have contracts with a range of other companies for other parts of our advertising estate, including for roadside advertising.

Our partners are empowered to consider advertisements submitted to them and can accept or reject them without referring them to us where the advertisement clearly does, or does not, comply with the Advertising Policy.

We want our partners to work with the industry to ensure advertisements comply with the Advertising Policy. Where an advertisement is contentious, our partners seek guidance from the Committee on Advertising Practice (CAP)¹ ahead of any referral to us to make a final decision.

We ask our advertising partners to refer to us all advertisements that include references to sensitive subject matter. These subjects include weapons, violence, nudity, body image issues, religion, political causes and gambling. These instructions do not prejudice any decisions to accept or reject these advertisements.

We always monitor complaints received once an advertisement is displayed, both from customers and those notified to us and our advertising partners by the Advertising Standards Authority (ASA). The work of the Advertising Steering Group, the publication of this report, and listening to feedback are just some of the actions we can take to make sure our copy approvals process and the implementation of the Advertising Policy remains robust.

¹ CAP is the sister organisation of the Advertising Standards Authority (ASA). It writes, revises and updates the Advertising Codes and offers advice on copy standards.



The Advertising Steering Group

The Advertising Steering Group was set up to provide us with advice and guidance on implementing our Advertising Policy. The Mayor of London appoints its members and the Chair is a member of the TfL Board. The members represent our diverse city and are encouraged to speak as informed members of the public rather than as delegates for a particular group or organisation.

Representatives from Exterion Media and JCDecaux are advisors to the group and we also serve as advisors and the Secretariat. The advisor's role is to help inform discussions by providing information and updates on our advertising estate.

The first informal meeting of the Advertising Steering Group, in January 2017, allowed members to meet and find out about our advertising estate, the Advertising Policy and the purpose of the group.

The inaugural meeting on 17 February 2017 covered advertising categories that are shown on our advertising estate. Members praised the Mayor of London and the Advertising Policy for talking about body image. The members agreed that the policy was being implemented successfully but that we should not be complacent and should continue to monitor how we capture complaints to ensure all are recorded. Members

thought that we could do more to make our customers aware of issues and challenges around advertising and lead on encouraging more appropriate, representative and diverse advertising more widely.

At the next meeting on 21 July 2017, members learnt more about academic research on body image and efforts being made by the IPA to increase diversity in the advertising industry. Dr Philippa Diedrichs gave a presentation summarising research on body image.

Tom Knox updated the group on the IPA's Here for Good campaign to improve diversity in the advertising industry. The campaign sets the advertising, media and communications agency sectors targets by 2020 for 40 per cent of positions at all levels within agencies to be held by women; 15 per cent of leadership positions in the industry's biggest agencies to be from a non-white background; and 25 per cent of new joiners will be from black, Asian, or minority ethnic (BAME) backgrounds.

The Advertising Steering Group will continue to meet regularly to discuss important issues from our advertising estate. Agendas, minutes and meeting materials will be published on TfL's website following each meeting tfl.gov.uk/info-for/business-and-commercial/commercial-media

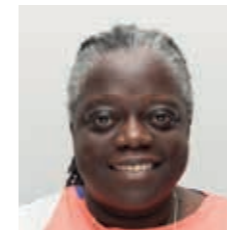
Membership



Dr Mee Ling Ng
TfL Board Member
(Chair)



Valerie Shawcross CBE
Deputy Mayor
for Transport



Evelyn Asante-Mensah
Former Commissioner
for Equality and Human
Rights Commission



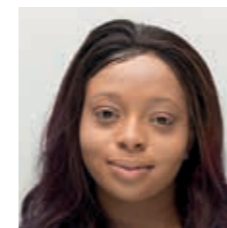
Dr Phillippa Diedrichs
Associate Professor in
Appearance Research,
University of
West England



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



Leah Kreitzman
Mayoral Director
for External and
International Affairs



Lexian Porter
Member of the
TfL Youth Panel



Kim Sanders
Head of Media
Engagement, Stonewall

Facts and figures

Since July 2016

16,000+
advertisements have been carried on our network

148 
complaints were received directly from our customers

61 
advertisements were accepted after we worked with the advertiser

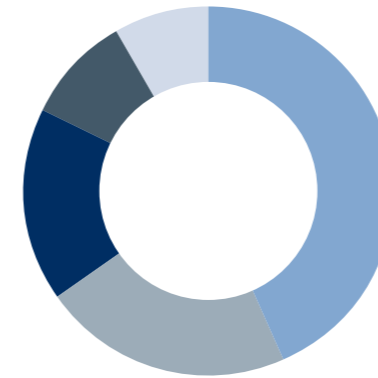
23 
advertisements were rejected by us

9 
advertisements on our network have been subject to ASA appeals

2 
ASA appeals were upheld, although five appeals were resolved informally

Advertising categories

Top five ad categories



- 1** Entertainment and leisure
4,394
- 2** Retail stores
2,198
- 3** Government, social and political
1,717
- 4** Business and industrial
962
- 5** Property
823

Category	Number of advertisements
Agricultural, gardening and pet care	9
Automotive	154
Business and industrial	962
Charities	49
Clothing	575
Confectionary	28
Cosmetics and toiletries	276
Drink	656
Education and vocational	91
Entertainment and leisure activities	4394
Finance	653
Food	462
Gaming	20
Government, social and political	1717
Home appliances	208
Home improvements	3
Household furnishings	50
Household supplies	5
Internet	7
Leisure products	211
Luxury goods	40
Mail order retail	184
Medical	27
Miscellaneous	148
Office and home computing	373
Pharmaceutical	339
Property	823
Publishing and media	128
Recruitment	77
Retail services	46
Retail stores	2198
Sport	7
Telecommunications	143
Travel and transport	820

Complaints

Since the updated Advertising Policy came into force on 11 July 2016, we have received 148 complaints on a range of topics. The most frequent topics of complaint were:

- Religion
- Political
- Sexual nature
- Body image
- Financial product
- Sexism

Advertisement	Number of complaints	Advertisement	Number of complaints
Islamic Relief	66	Dior Sauvage	1
Protein World	9	Disasters Emergency Committee	1
UK Security and Counter Terrorism*	8	GoVeganWorld	1
Boux Avenue	6	I am the Agent	1
QuoteJesus.com	5	Made.com	1
Fake advertisement – Royal Navy**	4	Northern Cyprus Tourism Board	1
Forza Diet	4	Not specified (sexual nature)	1
Israel Ministry of Tourism	4	Okessay	1
Man in the High Castle	4	PalExpo	1
Smart Pig	4	Perfectil	1
Amazon Web Services	2	Pride in London	1
Eve Mattresses	2	Quiz Clothing	1
Marsh & Parsons	2	Rihanna Anti World Tour (2015)	1
Metallica	2	Royal British Legion	1
Missguided	2	Uspaah	1
Naked Magicians	2	V&A Museum	1
Big Man on the Move – Limousine Company***	1	Virgin Trains	1
Central Intelligence (film poster)	1	Warner Bros Studio Tour	1
Coca-Cola	1		
Denial (film poster)	1	Total	148

Appeals

The ASA received complaints about nine advertisements on our network and each one is considered by the ASA through an appeal process. Two appeals were upheld against HouseSimple and Bio-tiful Dairy respectively relating to product claims. Appeals against advertisements by Hunter and Protein World were not upheld. Where an appeal was informally resolved, this means that the advertiser agreed to amend or withdraw the advertisement without the need for a formal investigation. Further information about these ASA rulings can be found on the ASA website at www.asa.org.uk

Advertiser	Date	Result of appeal
Pfizer	September 2016	Informally resolved
Chronext	October 2016	Informally resolved
Job Today	October 2016	Informally resolved
HouseSimple	November 2016	Upheld
Tyrells	January 2017	Informally resolved
Hunter	February 2017	Not upheld
Protein World	May 2017	Not upheld
Chantecaille	July 2017	Informally resolved
Bio-tiful Dairy	August 2017	Upheld

* UK Security and Counter Terrorism advertisements ran on the National Rail network but did not run on our network.

** A poster purporting to be from the Royal Navy was fly-posted on our network. The poster compared the Royal Navy to suicide bombers and, understandably, caused distress. As an illegally posted advert, we did not approve the poster. We treat all fly-posting as vandalism and ask our advertising partners to remove them immediately. We will work with police colleagues in any subsequent investigations.

*** A card from 'Big Man on the Move' was seen fly-posted on the Tube network. The advertisement advertised lap dancing; a category of advertising expressly banned by the Advertising Policy. The advertisement was not approved by us and we treated it as vandalism.

Rejections

Our advertising partners are empowered to accept or reject advertisements where they clearly do, or do not, comply with our Advertising Policy. Of those advertisements referred to us for a final decision, we rejected 23. Some advertisements were rejected for multiple reasons.

Reason for rejection	Frequency
2.3	2
2.3(a)	8
2.3(b)	6
2.3(d)	3
2.3(f)	1
2.3(l)	5
2.3(m)	1

Contact details for our advertising partners and more information on the clauses referred to above can be found in the Advertising Policy, which can be found at tfl.gov.uk/info-for/business-and-commercial/commercial-media on the commercial media page.

We do not seek to be a censor and will always seek to work with advertisers and brands to ensure that their advertisements comply with the Advertising Policy before rejecting an advertisement.



Lego bus shelter on Regent Street

Contact us

To send feedback or to complain about an advertisement, visit tfl.gov.uk/help-and-contact/contact-us-about-corporate-affairs

Find us on Facebook

Tweet us using @tfl

Call our 24- hour contact centre on 0343 222 1234

Or write to: TfL Customer Services,
4th Floor, 14 Pier Walk, London SE10 0ES

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