

# Annual Advertising Report

2017/18

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 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, 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 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 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.

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# Foreword

We will continue to invest to keep up with the fast-moving world of advertising.

Transport for London has one of the most valuable advertising estates in the world. But, faced with an ever-changing world and an incredible fast-moving advertising industry, we need to adapt our approach to the needs of modern London.

We are continuing to invest in our advertising infrastructure. In doing so, we ensure that our estate is not just one of the most valuable, but that it is high tech, forward thinking, and able to facilitate dynamic campaigns reflecting the vibrant city we serve. And this investment enables us to generate revenues to put back into running and improving our transport network.

This, our second annual advertising report, describes some of this investment, as well as the exciting new developments that we have seen in the past year, and the number and types of advertising we have run. It also details the number of complaints, rejections and ASA appeals upheld against advertisements on our network.

This all requires close collaboration between us and the advertising industry to produce creatives that are right for our network. A total of 144 advertisements were accepted after alterations on our network last year, up from 61 in the previous year.

I would like to say a big thank you to our advertising partners, and the Advertising Steering Group, who have continued to provide us with invaluable insight and expertise.

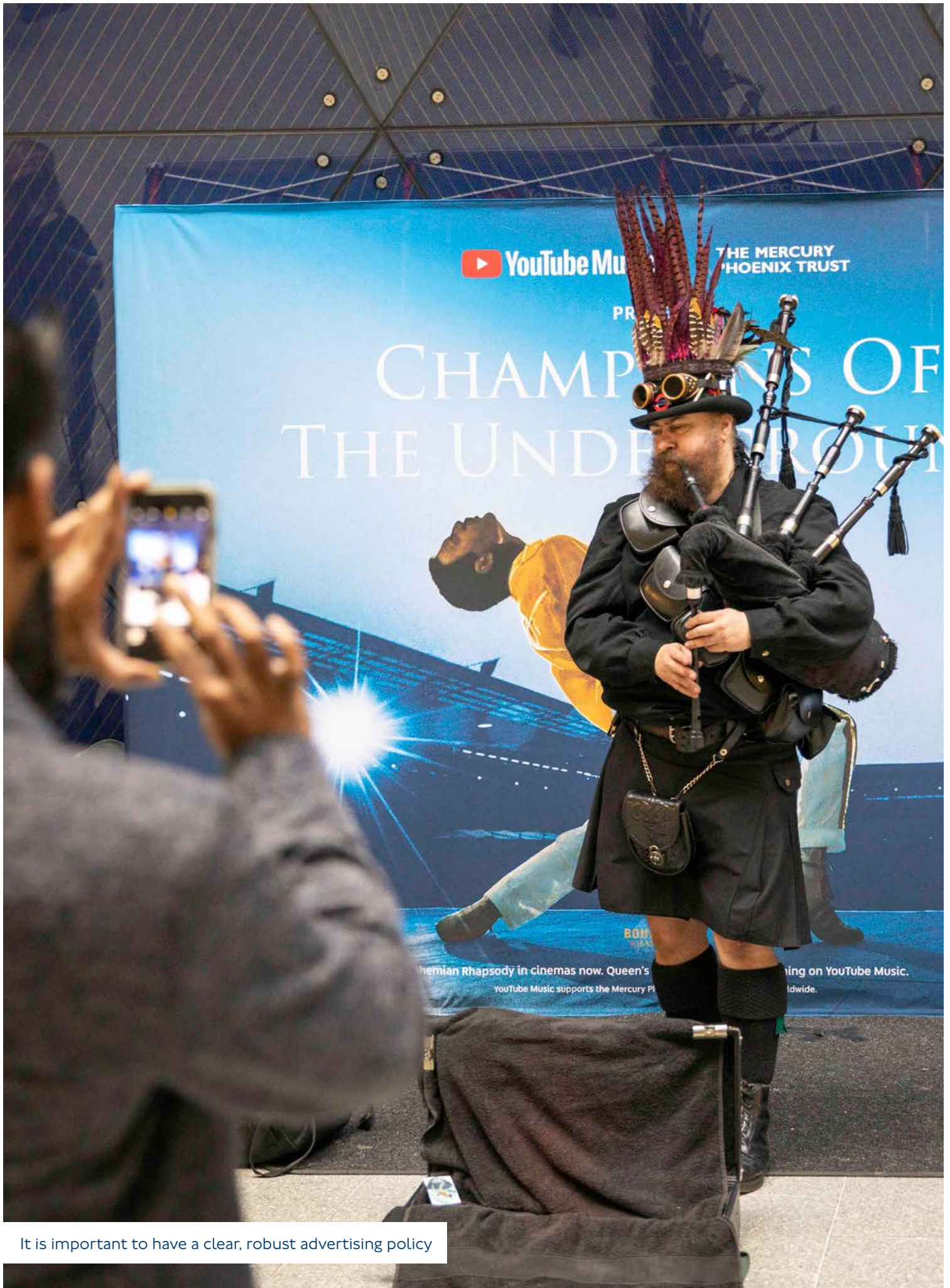


If you have a view on our advertising policy, or just an advert on our estate, please do get in touch. We take all ideas, suggestions and complaints seriously. They all go towards creating a better transport network.

**Vernon Everitt**  
Managing Director, Customers,  
Communication & Technology



Our estate can facilitate the most forward-thinking campaigns



It is important to have a clear, robust advertising policy

# Message from the Chair

It is important to have a robust advertising policy that recognises London's diversity.

I've learned a lot since becoming Chair of Transport for London's Advertising Steering Group. I did not fully appreciate the amount of decisions that Transport for London has to make when it comes to advertising, and I didn't fully appreciate the amount of adverts on the estate. I also discovered the huge range of issues that TfL has to assess and weigh up when permitting advertising, many of which the organisation now brings to the steering group for wider discussion.

Questions around politics, diversity and body image were raised throughout the year as part of TfL's decision-making process. This is why it's so important to have a clear, robust advertising policy – a policy that recognises London's incredible diversity, but is clear in its ambition to work with the industry to do this. And this is also why it's vital to have an advertising steering group, bringing a combination of industry and academic expertise with lived experience, questioning and testing that policy to ensure that it's fit for the challenges we face as a society.

Over the past year, the steering group has discussed TfL's engagement with customers regarding diversity in the advertising industry and indeed, diversity in the advertisements seen across the TfL network. We have discussed TfL's views on cryptocurrencies, pay day loans, junk food and body image, to name but a few.



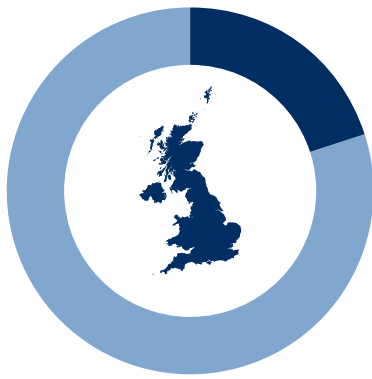
I would like to thank members of the group and the advisors from TfL and their advertising partners for their guidance and look forward to more lively discussion over the coming year.

**Dr Mee Ling Ng**  
Advertising Steering Group, Chair

# Our advertising estate

One of the most valuable advertising estates in the world.

## 20%



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

## 55m

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

## £82.9m

we are investing £82.9m to upgrade our advertising estate



## 260

D6 screens have been installed on the London Underground network, with 140 scheduled for 18/19

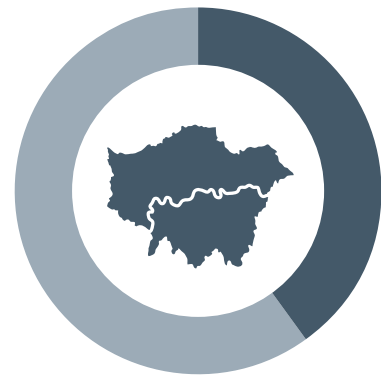


Our customers find advertising a welcome distraction





# 40%



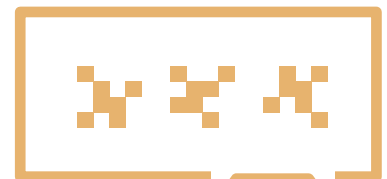
of London's outdoor advertising by value is owned by TfL



# £152.1m

Our advertising revenues increased to 152.1m in 17/18

# 12



large digital landscape advertising screens installed across London's road network

# Investment and innovation on our advertising estate

Thanks to investment, we facilitate some of the most innovative campaigns.

Through new infrastructure, enabling innovative experiential advertising campaigns and through a new and improved use of data, the past year has seen our advertising estate go from strength to strength. In 2017/8, we increased revenue generated by commercial advertising to £152.1m.

We are investing £82.9m to upgrade advertising infrastructure, and this investment continued throughout 2017/18, as we installed hundreds of new digital screens. This included 260 new full-motion D6 screens across the London Underground network – with a further 140 scheduled for 2018/19. We also fitted 60 full-motion DX3 screens across the London Underground – new digital displays hosting motion content, which customers will be able to watch when standing on station platforms.

In August 2018, we launched a partnership with Euronews – one of Europe's most-watched news channels – to bring bespoke live news content to the Tube. This runs across the DX3 screens and carries London, local and international news at 15 stations.

Outside of the Tube and rail network, we installed 12 large digital landscape advertising screens at six key locations along London's main arterial roads. From Heathrow to the Olympic Park, these screens, installed in collaboration with Outdoor Plus, will generate an additional £1.7m in revenue per annum.

As well as improving the environment in which our partners advertise, in 2017/18 we were able to better inform our partners about the types of people that they are advertising to, as we put our data to better use.

In November 2017, Pukka Herbs became the first company to use new segmentation data to engage its audience on the network. This technique overlays depersonalised and anonymous group data from Oyster cards with Experian Mosaic demographic groups. These groups then help inform brands or advertisers on the types of people that use our network, including where they travel in London and at what times. All of this information is anonymised and is grouped at station level so no individual can be identified, and no data is shared directly with brands or advertisers.

Through this tool we can now prove to brands that their campaigns are being seen by the people that they want to connect with, and who will be interested in their advertisements.

All of this new and improved technology provides a more attractive environment for our advertising partners, who in turn are able to facilitate more dynamic and high-tech campaigns.



Sherlock Gnomes takes over Baker Street station in this experiential campaign



THANKS GARETH FOR THE INCREDIBLE JOURNEY.  
SOUTHGATE IS YOURS.



After England's World Cup success, Southgate station was temporarily renamed in the manager's honour

This infrastructure consolidates our position as one of the most innovative advertising estates in the world, generating more revenue for us to reinvest in improving London's transport. We were recently recognised for this work when we were shortlisted for the best use of data as part of The Drum's Out of Home Awards 2018.

As well as investing in infrastructure, we continued to work with brands to facilitate innovative advertising. Building on our previous success in enabling experiential campaigns, customers travelling through Baker Street in April 2018 found the station 'taken over' by gnomes to celebrate the release of the 'Sherlock Gnomes' film, sequel to the 2011 film 'Gnomeo and Juliet'. The campaign featured 'roaming gnomes' and special PA announcements, along with the transformation of the Sherlock Holmes silhouette on the station platform walls. Gnomeo, Juliet and Sherlock Gnomes could also be found handing out activity sheets for children to help them solve the mystery.

This campaign and the numerous others are great examples of how brands can use our stations in an engaging way. They're also an example of how advertisers have more flexible and dynamic opportunities to connect with their audiences at our stations.

In July 2018, in honour of the success of the England national football team at the World Cup in Russia, we teamed up with Visa to rename the Grade II listed Piccadilly line station Southgate to Gareth Southgate, after the team's manager. Lasting for 48 hours and obtaining global media coverage, the renaming included the signage on the platforms, in the ticket hall and outside the station. It was a great example of how we can work creatively with brands outside of the traditional advertising space.

We also saw a number of advertising 'takeovers' in which brands such as Netflix covered the walls and ceilings at Oxford Circus and Old Street Tube stations to promote the new series of Stranger Things and Black Mirror.

These campaigns captivated audiences, and fans took to social media in excitement about the forthcoming broadcasts. Elephant & Castle Tube station also sparked intrigue in the music press in August when posters depicting a new 3D Aphex Twin logo were spotted on the walls. Rumours quickly started amongst fans about a highly-anticipated new album.

These campaigns brought some unexpected fun to the thousands of customers passing through our stations.

# Our advertising policy. Health and diversity in London

Working with advertisers to bring respectful and responsible campaigns to our network.

In 2017/18 we continued to evaluate our advertising policy. We want to ensure that we are always facilitating great campaigns, and that advertising is responsible and respectful, and reflects the diverse nature of London.

As part of the Draft London Food Strategy, Mayor Sadiq Khan announced plans in May 2018 to ban advertisements for food or drink that is regarded as HFSS (high in fat, salt or sugar) on our network. London has one of the highest child overweight and obesity rates in Europe, with almost 40 per cent of children aged ten and 11 overweight or obese. We have a crucial role in the health of all Londoners, and it is important for us to play a role in supporting the creation of a healthier, more active London, a key aspect of the Mayor's Transport Strategy.

Our data suggests a large percentage of the advertising which would be affected comes from a handful of major companies and brands. As part of the consultation process we have been engaging with the industry and encouraging them to shift their advertising towards their healthier products.

The draft London Food Strategy was open for consultation from 11 May-5 July 2018. The results of this were published in November 2018, where it was

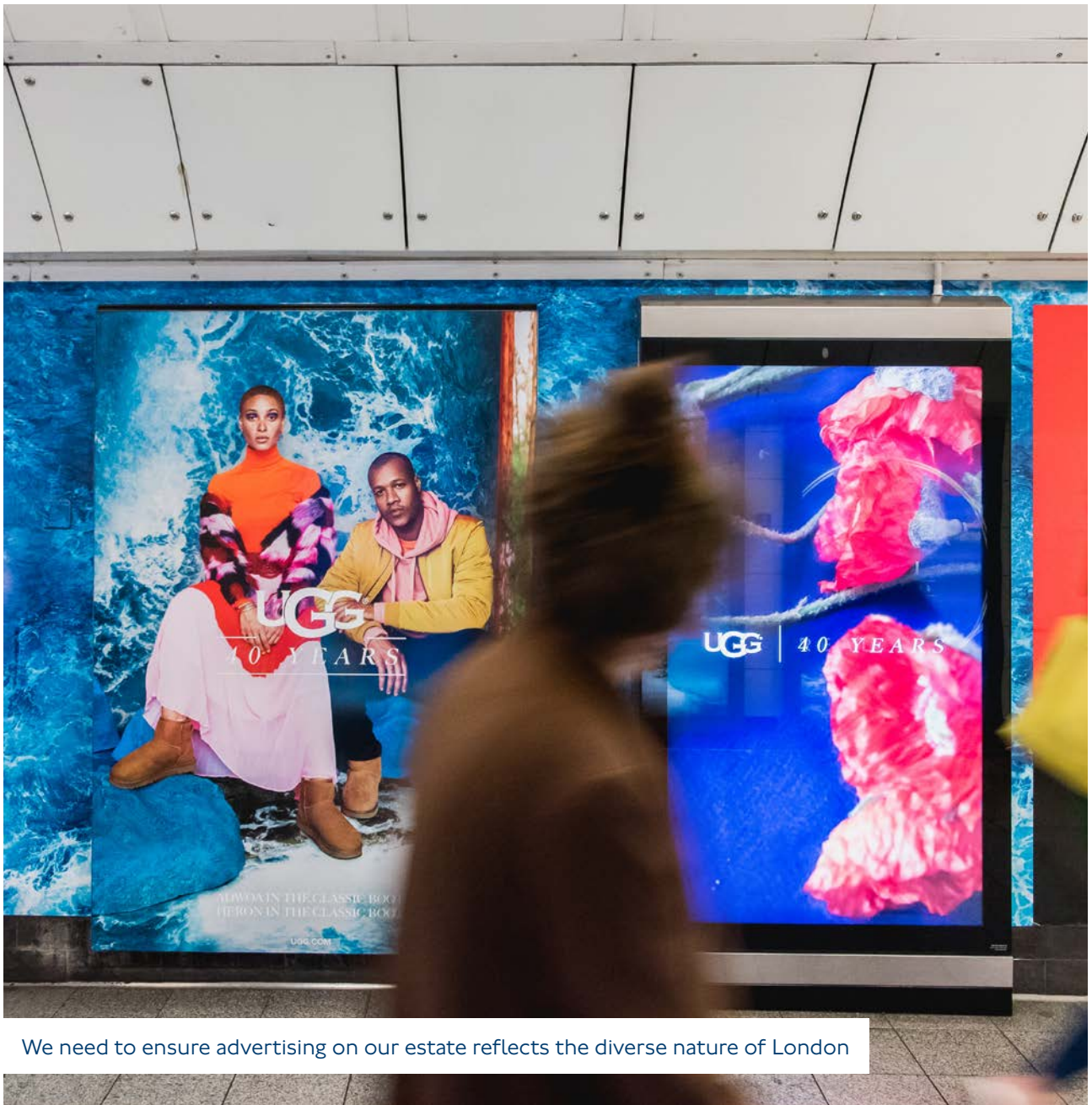
confirmed that as of 25 February 2019, there will be restrictions on advertising food that is high in fat, salt or sugar. We will work with advertisers to ensure they understand what adverts will be allowed when these restrictions take effect.

When it comes to diversity, we know that the advertising industry has not always got things right. Earlier this year, the GLA commissioned research from University College London, which revealed that Londoners don't feel the women they see in adverts are representative of women in the capital. The findings showed that 75 per cent of Londoners feel that adverts should reflect the diversity of the city's population, yet fewer than one in four thinks adverts are culturally diverse. It also highlights that women and girls feel pressured to achieve a specific beauty standard as a result of the women they see in adverts around the city.

In July 2018, we supported the Mayor's launch of the 'Women We See' competition to help address the issue. This challenged agencies and brands to submit a concept that addressed some aspect of this issue, whether it be older women, BAME women, women with disabilities (visible and not visible), single parents, women from diverse socio-economic backgrounds or LGBT women.

The winner will see their concept appear across our network from January 2019 with advertising space worth £500,000. They will have the chance to reach a huge audience across London and lead

the way in driving positive change in the industry. There is also the chance for two shortlisted campaigns to receive a prize worth £50,000 in match funding in digital advertising.



We need to ensure advertising on our estate reflects the diverse nature of London

# The Advertising Steering Group

Discussing the important issues to make sure our advertising policy remains relevant.

The first meeting of the Advertising Steering Group in 2018 took place on 16 February. After hearing an update on the number of advertisements that ran from July 2017-December 2018 and the number and category of complaints, members discussed recent advertisements that had obtained media coverage.

Members also discussed how TfL could engage more with the industry and with customers regarding advertising. It was suggested that TfL could do more to explain to the industry the clauses of the Advertising Policy including the clauses on graffiti and the appearance of broken glass, and how they are applied. For customers, more information could be put on the TfL website, including that about the copy approval process.

Members discussed how more is needed to be done to make advertising representative of London's diverse population, and that 'brand safety' and reputation was important in advertising.

The Advertising Steering Group next met in July 2018. Heidi Alexander, newly appointed Deputy Mayor for Transport took the place of Val Shawcross CBE.

Members heard an update on TfL's policy towards advertisements for pay day loan products. It was acknowledged that media coverage of pay day loans has decreased over recent years, as well as the use of the loans themselves.

Members also heard an update on TfL's policy towards the advertisement of cryptocurrency products. Cryptocurrency advertising is not significant, but had increased.

TfL continues to monitor this category of advertisements, particularly following the ban on cryptocurrency advertising by digital platforms such as Twitter.

Members recognised the point that restrictions on online advertising of cryptocurrency were perhaps more appropriate, given that the purchasing of the product requires people to be online.

It was acknowledged that there were more steps required between the viewing of an advert on the TfL estate and the actual purchasing of a cryptocurrency product compared to online advertising.

A verbal update was given on the draft London Food Strategy consultation, which closed on 5 July. Members heard an initial analysis of the responses to the consultation, including the responses to a potential ban on HFSS and initial themes drawn from the responses concerning the consultation as a whole.

The Advertising Steering Group will continue to meet to discuss issues from our estate. Agendas, minutes and materials will be published at [tfl.gov.uk/infofor/businessandcommercial/commercialmedia](https://tfl.gov.uk/infofor/businessandcommercial/commercialmedia)



## Membership

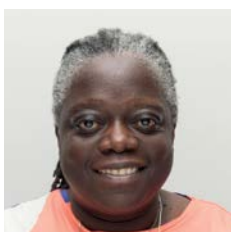
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**Dr Mee Ling Ng**  
TfL Board Member  
(Chair)



**Heidi Alexander**  
Deputy Mayor  
for Transport



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



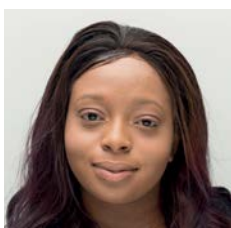
**Dr Philippa Diedrichs**  
Associate Professor in  
Appearance Research,  
University of  
West England



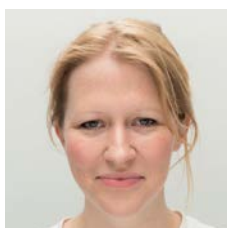
**Tom Knox**  
Chairman of MullenLowe  
and former President  
of the Institute of  
Practitioners in  
Advertising (IPA)



**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 2017.

**16,000+**

advertisements have been carried on our network

**252**



complaints were received directly from our customers

**144**



advertisements were accepted after alteration

**28**



advertisements were rejected

**23**



advertisements were subject to ASA appeals

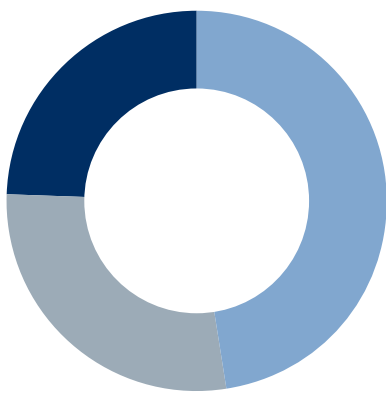
**11**



ASA appeals were upheld

# Advertising categories

## Top three advertising categories:



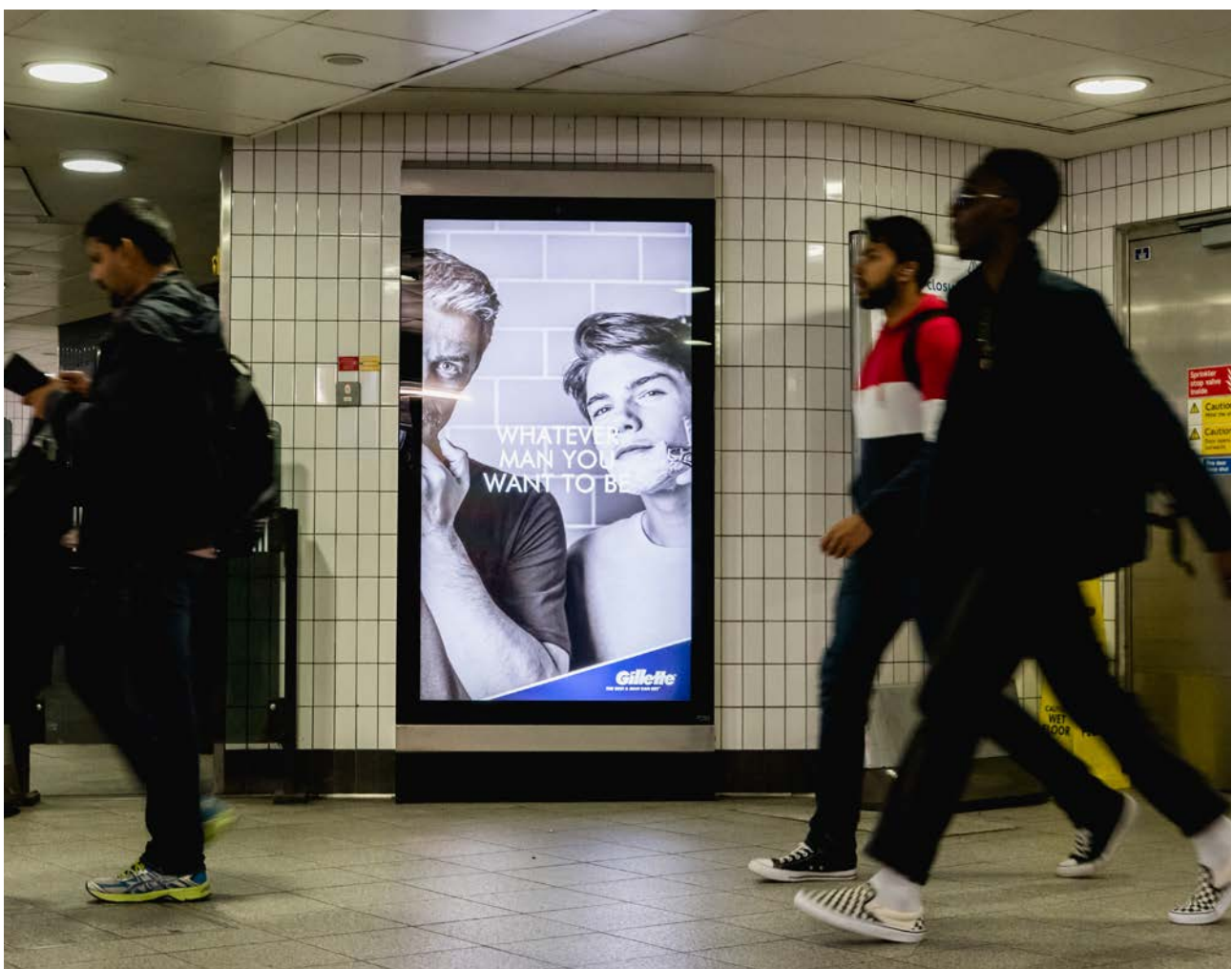
- 1** Entertainment and leisure  
**3,583**
- 2** Retail stores  
**2,103**
- 3** Government, social and political  
**1,829**

| Category                      | Number of advertisements |
|-------------------------------|--------------------------|
| Business and industrial       | 944                      |
| Clothing and accessories      | 478                      |
| Computers                     | 197                      |
| Cosmetics and toiletries      | 200                      |
| Drink                         | 452                      |
| Entertainment and the media   | 3583                     |
| Finance                       | 479                      |
| Food                          | 297                      |
| Gardening and agriculture     | 13                       |
| Govt/Social/Political         | 1829                     |
| Household appliances          | 8                        |
| Household equipment           | 217                      |
| Household stores              | 7                        |
| Leisure equipment             | 200                      |
| Mail order                    | 208                      |
| Motors                        | 86                       |
| Online shopping               | 145                      |
| Pharmaceutical                | 326                      |
| Property                      | 560                      |
| Recruitment                   | 41                       |
| Retail                        | 2103                     |
| Travel and transport          | 558                      |
| Office equipment and supplies | 19                       |
| Unknown                       | 740                      |

# Complaints

In 2017/18, we received 252 complaints on a range of topics. The most common advertising categories that received complaints were:

- Religion
- Political
- Body image
- Fly posters
- Sexual nature



| Advertisement                              | Number of complaints | Advertisement                          | Number of complaints |
|--|----------------------|--|----------------------|
| Russia Today                               | 89                   | Book a hitman                          | 1                    |
| For the love of Allah                      | 43                   | Canada Goose                           | 1                    |
| Jigsaw (film)                              | 11                   | See it, Say it, Sort it                | 1                    |
| Ramadan                                    | 10                   | Muslim Aid                             | 1                    |
| Quotejesus.com                             | 8                    | Natural History Museum                 | 1                    |
| Israel apartheid posters*                  | 7                    | Semilsrael Expo                        | 1                    |
| Unknown advert                             | 7                    | Pregnacare                             | 1                    |
| The Ritual (film)                          | 4                    | Forza Diet                             | 1                    |
| Ryanair                                    | 4                    | Disney                                 | 1                    |
| World Baloch Organisation                  | 4                    | Benylin                                | 1                    |
| Unspecified: Nudity/sexual nature          | 4                    | Unspecified: Guns                      | 1                    |
| Pay day loans                              | 3                    | Unspecified: Horror                    | 1                    |
| Boohoo                                     | 3                    | Go Vegan World                         | 1                    |
| Victoria's Secret                          | 3                    | Local Refurbished Accommodation        | 1                    |
| The Mega T-side Format                     | 3                    | Natural History Museum                 | 1                    |
| The Ashes (computer game)                  | 2                    | Clarks                                 | 1                    |
| Potatoes: more than just a bit on the side | 2                    | Bible & Rosary                         | 1                    |
| The Snowman (film)                         | 2                    | First Direct Bank                      | 1                    |
| United Colours of Benneton                 | 2                    | Hostmaker Rental Services              | 1                    |
| Monarch (airline)                          | 2                    | Display of guns and weapons            | 1                    |
| Munich (book, Robert Harris)               | 2                    | Jigsaw Movie                           | 1                    |
| Kingsman (film)                            | 2                    | London Dungeons                        | 1                    |
| McDonalds                                  | 2                    | The Greatest Showman (film)            | 1                    |
| Coca Cola                                  | 2                    | Illuminated video advertising on buses | 1                    |
| Magic Mike                                 | 2                    | Timotei Conditioner                    | 1                    |
| Cadent                                     | 2                    |  |                      |
| China-Pakistan Economic Corridor (CPEC)    | 2                    | <b>Total</b>                           | <b>252</b>           |

\* These adverts were fly posted – they were not approved by Transport for London or our advertising partners, nor would they would have been approved if they were submitted to us. These posters are an act of vandalism which we take extremely seriously. Upon hearing of the posters, we instructed our contractors to remove any of these posters found on our network immediately and referred the matter to the police. We are also working with our contractors to see what measures we can take to improving the security of our advertising sites, particularly bus shelters.

# Appeals

The Advertising Standards Authority received complaints about 23 advertisements that ran on our network, and each one was considered by the ASA through an appeals process. Eleven complaints were upheld for a variety of reasons, from misleading advertising, responsible advertising concerns and exaggeration. Where an appeal was informally resolved, 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](http://www.asa.org.uk)

| Advertiser                   | Date           | Result of appeal        |
|------------------------------|----------------|-------------------------|
| eHarmony                     | August 2017    | Upheld                  |
| Quiz Clothing                | August 2017    | Not upheld              |
| V24 Shot                     | August 2017    | Not upheld              |
| Pretty Little Thing          | September 2017 | Not upheld              |
| Push Doctor                  | October 2017   | Upheld in part          |
| Ryanair                      | October 2017   | Upheld                  |
| Greenpeace                   | October 2017   | Informally resolved     |
| Sunny Loans                  | October 2017   | Not upheld              |
| Fever Tree                   | November 2017  | Informally resolved     |
| HotHouse Partnerships Ltd    | November 2017  | Upheld                  |
| Palmers                      | December 2017  | Informally resolved     |
| On The Beach                 | January 2018   | Upheld                  |
| TalkTalk                     | January 2018   | Upheld                  |
| Zoopla                       | January 2018   | No further action taken |
| Boots                        | February 2018  | Investigation ongoing   |
| Veganuary                    | February 2018  | Informally resolved     |
| i heart Wines                | February 2018  | Upheld                  |
| Eden Farmed Animal Sanctuary | February 2018  | Upheld                  |
| Ryanair                      | March 2018     | Upheld informally       |
| Babylon                      | April 2018     | Upheld                  |
| Puressential                 | May 2018       | Upheld                  |
| On the Market                | May 2018       | Upheld in part          |
| Don Broco                    | July 2018      | Not upheld              |

# 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 28. Some advertisements were rejected for multiple reasons.

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](http://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.

| Reason for rejection | Frequency |
|----------------------|-----------|
| 2.3                  | 2         |
| 2.3(a)               | 7         |
| 2.3(c)               | 6         |
| 2.3(e)               | 1         |
| 2.3(f)               | 3         |
| 2.3(j)               | 1         |
| 2.3(l)               | 1         |
| 2.3(m)               | 1         |
| 2.3(n)               | 8         |
| 2.3(p)               | 1         |

# Contact us

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





GARETH SOUTHGATE

#SouthgateSelfie  
VISA

© Transport for London

November 2018

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