

Proposal

Project Title	Development of a Lancashire Healthy Advertising and Sponsorship Policy
Project Lead	Wider Determinants of Health Team

Project Summary

In March 2022, Lancashire Health and Wellbeing Board re-signed the Local Authority Healthy Weight Declaration (HWD) committing to act on unhealthy weight in the County. Commitment eight of the HWD specifically addresses action on inappropriate advertising:

"Protect our children from inappropriate marketing by the food and drink industry such as advertising and marketing in close proximity to schools, 'giveaways' and promotions within schools, at events on local authority owned sites."

In recent times there has been a drive by local authorities and healthy food campaigners (such as Food Active and Sustain) to develop policies restricting the outdoor advertising of high fat, salt, and sugar (HFSS) food and drink on both local authority-controlled sites and on transport networks. A high-profile example being restrictions on HFSS advertising on the Transport for London estate which came into effect in February 2019.

Looking more widely at the issue, the Commercial Determinants of Health (CDOH) are the commercial activities that affect people's health, directly or indirectly, positively, or negatively. They impact a wide range of risk factors including smoking, air pollution, alcohol use, obesity and physical activity, and health outcomes including noncommunicable diseases, and mental health conditions¹.

Public Health is proposing to develop and implement a policy across Lancashire County Council owned estate that would ensure we only advertise or allow sponsorship that contribute to a healthy lifestyle. This would preclude advertising food and drinks that are high in Fat, Salt or Sugar (HFSS), tobacco or related products (e.g. vapes), alcohol, gambling and other less healthful products and behaviours. This links to our overall aim to support residents in making better choices that support health and wellbeing. The proposed policy directly aligns to the Health and Wellbeing priority areas of Healthy Hearts, Best Start in Life and Happier Minds.

The proposed policy would only be applicable to advertising on LCC owned estate and sponsorship of LCC events. Advertising space owned by other providers (e.g., district councils or privately owned assets) are out of scope of the proposed policy.

Advertising and sponsorship are defined within this proposal as follows:

- Advertising – the advertisement of products and/or services on council owned assets
- Sponsorship – agreement between council and sponsor organisation where the council receives either money or a benefit in kind for an event, campaign or initiative from an organisation which gains publicity or other benefits by its association.

¹ [Commercial determinants of health \(who.int\)](https://www.who.int/news-room/fact-sheets/detail/commercial-determinants-of-health)

Project aim:

- To develop a LCC policy that promotes healthy options and restricts advertising and sponsorship of high fat, salt, and sugar (HFSS) food and drink, alongside other public health issues including gambling, smoking, alcohol, and general depictions of unhealthy and/or risky behaviours.
- To advocate for and support district councils and other stakeholders to adopt advertising and sponsorship policies restricting promotion of HFSS food and drink and other public health issues.

Why is this project necessary? What is the evidence for need?

Work from the National Institute for Health and Care Excellence (NICE) centered around cardiovascular disease prevention produced a series of recommendation for policy and practice². Within these recommendations a focus is placed on the marketing and promotion of unhealthy products aimed at children and young people.

The following section sets out the need for restricting advertising of high fat, salt, and sugar (HFSS) food and drink, vaping, alcohol, and gambling, specifically to children, young people, and vulnerable groups. It is acknowledged that a resulting LCC policy may include a broader range of restrictions.

Healthy weight

Being overweight or obese can affect both a person's physical health, increasing their risk of developing many life-threatening conditions such as cancer, Type 2 diabetes, and heart disease. As well, there are numerous damaging impacts to a person's mental health, being linked to high rates of depression and anxiety. As such, it has been estimated that cost to society for obesity related conditions is £27 billion per year. This is an issue across all age groups within Lancashire, with 23% of Reception children (aged 4 to 5 years), 37% of year 6 children (aged 10 to 11 years), and 66% of adults being classified as overweight or obese³.

The Health and Care Act 2022 includes restrictions on less health food and drink advertising. This includes a 9pm TV watershed for HFSS products and a restriction of paid-for HFSS advertising online. Evidence suggests this will lead to a shift of 26% in advertising type of from TV and online to out-of-home advertisements e.g., billboards, bus stops and roundabouts⁴.

The government Tackling Obesity Strategy highlights the need to address the food environment to support healthier diets. It is now recognised that it is not enough to provide only nutrition and food education and expect a positive change. Although personal responsibility for what we consume is important, larger food systems including the obesogenic environment we live in, have an impact on our ability to choose a balanced food diet. The Obesity Strategy suggests that when we are bombarded by advertisements and promotions for food it is harder to eat healthily, especially when we are busy or tired. Convenience is a major factor in food choice and the abundance of easily accessible, low-cost food, whether that be a takeaway or pre-prepared processed supermarket food, makes this choice even more difficult.

² [Recommendations | Cardiovascular disease prevention | Guidance | NICE](#)

³ [Obesity Profile - Data - OHID \(phe.org.uk\)](#)

⁴ <https://www.gov.uk/government/consultations/total-restriction-of-online-advertising-for-products-high-in-fat-sugar-and-salt-hfss/evidence-note#adjusting-for-displacement>

Restricting HFSS advertising presents an opportunity to advertise more healthful food and drink products. Currently, a third (33%) of food and drink advertising spend goes towards confectionery, snacks, desserts, and soft drinks with only 1% spend on fruit and vegetables⁵.

In addition to tackling healthy weight through advertising and sponsorship restrictions, there is an opportunity to develop an overarching policy restricting promotion of other less healthful products and behaviors including alcohol, tobacco, and related products (e.g., vapes) and gambling. Evidence for addressing these issues concurrently is outlined below.

Alcohol

Alcohol misuse is one of the UK's biggest risk factors for death, ill-health, and disability amongst 15–49-year-olds in the UK. It is associated with numerous medical conditions, including, mouth, throat, stomach, liver and breast cancers, high blood pressure, cirrhosis of the liver and mental health problems, such as anxiety and depression. Alongside medical impacts, long term alcohol misuse can lead to many social problems, such as unemployment, anti-social behaviour, domestic abuse, and homelessness.

Young Persons' Survey 2020 reported that approximately 1 in 8 young people (14-17-years old) claimed to drink at least once a week, with the majority of those doing this under adult supervision. Admissions for alcohol-specific conditions for males under 18 (23.6 per 100,000) was similar to England's average (23.3 per 100,000) yet was significantly worse (45.4 per 100,000) for females aged under 18 than the English average (36.9 per 100,000)⁶.

Continuous marketing of alcohol has served to normalise alcohol consumption across the UK, meaning people believe its consumption has become a part of everyday life from a young age, increasing immediate consumption⁷. There is strong evidence to suggest that exposure to alcohol marketing from a young age can lead to an increased likelihood of drinking from an early age, alongside a higher prevalence of alcohol intake throughout the life course. This is particularly concerning, as research has found 82% of 3399 young people aged 11-19 years old across the UK were able to recall seeing at least one form of alcohol marketing in the last month, while 17% owned branded merchandise⁸.

Tackling alcohol related harm is an important route towards reducing health inequalities. The impact of alcohol harm and alcohol dependence is felt more in areas of greater deprivation than lower income brackets. Although reasoning for this is not fully understood, as research from NHS digital has found the proportion of adult non-drinkers was highest in the most deprived areas (29%), compared to 10% in least deprived areas, this is typically known as the 'alcohol harm paradox'. It is likely the increased risk of alcohol is related towards the combination of multiple risk factors felt by people living in lower socioeconomic groups. What's more, evidence surrounding the advertising of products within the commercial determinants of health, particularly for HFSS and unhealthy food and drinks, such as alcohol beverages, have been found to be observed more so by those living in areas of higher deprivation as well as young people⁹. Evidence such as this is particularly concerning

⁵ [The Broken Plate 2023 | Food Foundation](#)

⁶ [Young Persons' Survey 2020: Attitudes and Behaviour towards Alcohol, Smoking and Knives Local Authority Report for Lancashire](#)

⁷ [Immediate effects of alcohol marketing communications and media portrayals on consumption and cognition: a systematic review and meta-analysis of experimental studies | BMC Public Health | Full Text \(biomedcentral.com\)](#)

⁸ [Awareness of alcohol marketing, ownership of alcohol branded merchandise, and the association with alcohol consumption, higher-risk drinking, and drinking susceptibility in adolescents and young adults: a cross-sectional survey in the UK | BMJ Open](#)

⁹ [Advertisement of unhealthy commodities in Bristol and South Gloucestershire and rationale for a new advertisement policy | BMC Public Health \(springer.com\)](#)

for Lancashire, as we experience more deprivation compared to any other two-tier county authority, with both the least and most deprived areas, highlighting the exacerbated inequalities across the county¹⁰.

Smoking and e-cigarettes/vaping

Smoking tobacco is one of the UK's biggest preventable killers. It is estimated smoking-related hospital admissions occur almost every minute within England, costing the NHS £17 billion a year. The detrimental impact of smoking is unavoidable, yet through continual marketing, for many it has become a lifelong addiction¹¹. The advertisement of tobacco has been heavily scrutinised in recent history, with the Tobacco Advertising and Promotion Act 2002 banning most forms of advertising and promotion in the UK, such as through print and broadcast media, billboards, direct mail, product placement, etc. This was followed by standardisation of tobacco packaging in 2016.

Research has found the e-cigarette and vaping industry to be employing previously utilised advertising approaches used by the tobacco industry, including the use of celebrity or influencer endorsement across social media and advertisements which feature bright colours and/or attractive flavours¹². In 2023, only one in five children (11-17 years) said they never see vapes promoted, with just 3.5% of children saying they are not aware of e-cigarettes, compared to 36% in 2013. A further concern is that despite being illegal to sell vapes to children, giving them out for free is not, with 2.1% of children who have ever tried vaping, saying that their first vape was given to them freely by an e-cigarette company.

'Stopping the start: our new plan to create a smokefree generation' policy paper¹³ was published in October 2023, where the government outlined how a new strong approach to enforcement will be utilised to create a smokefree generation. Following this a new Tobacco and Vapes Bill was introduced in March 2024, with MPs voting to pass the bill on April 17th, 2024. Additional enforcement measures were included in the bill including powers to restrict the flavour and packaging of vapes which are intentionally marketed at children were introduced. This is alongside changing of how vapes are displayed in shops, moving them out of visual sight from children and away from products which typically appeals to children (e.g., sweets).

Gambling

Aligning to the Health in All Policies (HiAP) across LCC, addressing the prevalence of gambling is key for those vulnerable to experiencing gambling related harm. Evidence has shown the detrimental impacts in which gambling harm can have from the early stages of life, with significant impacts upon a person's physical health, mental health, relationships, finances, employment, and suicidal ideation¹⁴.

Problem gambling, a gambling behaviour which often disrupts the daily life and career of a person, impacting themselves and their peers is estimated by Government to cost the UK, through associated costs, £1.27 billion per year. With up to 460,000 people within the UK likely to be problem gamblers, and a further 3.8% at risk¹⁵. A recent survey from Ygam and GAMstop has stressed the impact of gambling upon university students', with student gamblers reported to lose

¹⁰ Lancashire Insight. Office for Health Improvement and Disparities, Fingertips-Public health data, <https://fingertips.phe.org.uk>

¹¹ [Smokefree generation one step closer as bill introduced - GOV.UK \(www.gov.uk\)](#)

¹² [Smith MJ and S Hilton, 2023. Youth's exposure to and engagement with e-cigarette marketing on social media: a UK focus group study. BMJ Open.](#)

¹³ [Stopping the start: our new plan to create a smokefree generation - GOV.UK \(www.gov.uk\)](#)

¹⁴ [Landmark report reveals harms associated with gambling estimated to cost society at least £1.27 billion a year - GOV.UK \(www.gov.uk\)](#)

¹⁵ [Gambling-related harms evidence review: summary - GOV.UK \(www.gov.uk\)](#)

£35.25 a week on average ¹⁶. The impact of problem gambling, and the wide-ranging harms associated has been widely acknowledged, from harms to the individual gambler, both physically and mentally, to friends, family, peers, and wider society.

The marketing and advertisement of gambling has become a frequent presence in the UK, from television adverts, social media posts and viral internet campaigns. The frequency of these advertisements has grown substantially, the National Audit Office reported an estimated 56% increase in advertising spend from gambling operators between 2014-17. Such an increase in frequency has led towards concerns surrounding the high volume of gambling advertisements, particularly during sports coverage. A report from the University of Bristol found there to be 6,966 gambling messages shown in just six televised Premier League matches over the 11-14 August 2022/23, the Premier League's opening weekend¹⁷. Advertising of these products is more prevalent in areas of higher deprivation.

UNICEF Baby Friendly Initiative

Breastfeeding within the first six months of a baby's life is one of the most effective ways to ensure positive child health and survival. Breastfeeding has unmatched benefits for infant and maternal physical and emotional health, as it:

- is tailored made to meet a baby's nutritional needs as they grow and develop.
- contains antibodies which can protect them against infections and illness.
- provides the opportunity to create a bond with the baby as well as providing them with food and comfort.
- offers protection against sudden infant death syndrome, childhood diabetes and leukaemia.
- can protect a mother's health by reducing their risk of ovarian cancer, breast cancer, diabetes, and osteoporosis.

Breastfeeding is an important measure of public health and is included as an indicator in the public health outcomes framework. Increasing the number of babies who are breastfed is expected to reduce inequalities in young children and cut the incidence of common childhood illnesses such as ear, chest, and gut infections¹⁸. Increasing the number of babies breastfeeding to near-universal levels for infants and young children could potentially save over 800,000 lives a year (equivalent to 13% of all deaths in children under two). While there are further economic benefits, with a cost saving of £26.5 million to the UK economy, and protecting household income, with formula feeding costs ranging between £44 to £89 per month.

The UK has some of the lowest breastfeeding rates in the world, with eight out of ten women stopping breastfeeding before they want to ¹⁹. Across the Lancashire-12 only 33.5% of babies were found to be first feed breastmilk (excluding expressed and donor milk), a rate which is significantly lower than the England rate of 71.7%. While rates of gastroenteritis, an illness four times less likely to be experienced by a baby who is breastfed than a formula-fed baby, for babies under the age of one years old (243.4 per 10,000) was significantly higher than rates across England (113.2 per 10,000) ²⁰.

¹⁶ [Student Gambling Survey 2024. Ygam.](#)

¹⁷ [September: Premier League football gambling advertising | News and features | University of Bristol](#)

¹⁸ [Quigley et al, 2007. Breastfeeding and Hospitalization for Diarrheal and Respiratory Infection in the United Kingdom Millennium Cohort Study. Pediatrics.](#)

¹⁹ [Breastfeeding in the UK](#)

²⁰ [Child and Maternal Health – Data- OHID \(phe.org.uk\)](#)

In line with the WHO International Code Of Marketing Of Breast-Milk Substitutes²¹, current UK law prohibits advertising and promotion of infant formula which is marketed for use from birth. Follow-on formula, marketed for use from 6 months of age, and milks for older babies can be advertised and promoted, however this must not cross-promote infant formula through similar branding or by it not being obvious the product is for older babies²². The UK Committee for UNICEF has found infant formula companies' use a range of ways to target women through online and offline channels and platforms. Research has highlighted over half of all parents and pregnant women (84% in the UK) reported to have been targeted with marketing from infant formula companies. Often these tactics utilised are to exploit parents' anxieties and aspirations, distorting science, and medicines to legitimise their claims and push their products²³.

Lancashire County Council's services again received the UNICEF Baby Friendly Initiative (BFI) Gold award following their re-validation visit in March 2024. The BFI enables public services to better support families with feeding and developing close and loving relationships so that all babies get the best possible start in life. The initiative additionally advocates for all parents, irrespective of feeding method, to be equipped with evidence-based information upon which to make an informed choice about how to feed and care for their babies so that they can get the best possible start in life. The proposed advertising and sponsorship policy would ensure that LCC continues to adhere to the WHO code²¹, including restricting promotion of breastmilk substitutes and food products which state 'from 4 months' which contradict current guidance to start complementary feeding from around six months of age.

What is the size of the opportunity?

LCC currently owns advertising space on 53 bus shelters which are all currently promoting positive messages about LCC fostering and adoption services (Education and Childrens Services): 25 in Hyndburn, 22 in Pendle, 4 in Preston, 2 in Burnley. Of these 53 bus shelters, 83% are situated within the 50% most deprived areas in the UK, with 20 (38%) in decile 1, 76% in the 40% most deprived areas and 66% in the 30% most deprived areas. As well, 92% are in the 50% worse areas for health and disability deciles, with 24 (45%) in decile 1, 83% in the 40% worse health and disability deciles and 75% in the 30% worse health and disability decile.

LCC additionally owns 150 roundabouts (23 Chorley, 5 Hyndburn, 10 Lancaster, 13 Pendle, 34 Preston, 5 Ribble Valley, 5 Rossendale, 41 South Ribble, 14 West Lancs) which are sponsored on an annual basis.

Many advertising billboards, bus stops etc. within the county are owned by private companies such as Clear Channel and Global. Some of district councils also have advertising space and work is currently being undertaken to establish the size of this.

What benefits will the project deliver?

Whilst recognising that obesity is a complex problem with multiple causes, implementation of advertising restrictions of HFSS products across the London transport network claimed a range of public health benefits:

- Reduction in the number of calories and the amount of sugar and fat consumed from high in fat, salt, and sugar products per household.

²¹ [Health-Professionals-Guide-to-the-Code.pdf \(unicef.org.uk\)](#)

²² [Guide to UK formula marketing rules. Baby Milk Action.](#)

²³ [How the marketing of formula milk influences our decisions on infant feeding. UNICEF.](#)

- An estimated 4.8% fewer individuals with obesity, alongside a reduction of diabetes and cardiovascular diseases over a three-year period.

Evidence has further highlighted how the prevalence of HFSS food and drink and other public health issues, such as gambling, smoking, vaping, and alcohol products are typically found within areas of higher deprivation, placing individuals within these areas at a greater likelihood of consuming/utilising these products. The benefits reported by Transport for London were found to likely benefit people who live in the more deprived areas, suggesting the policy can help to reduce health inequalities.

Substantial economic costs are reported from commercial determinants of health which are promoting less healthful behaviours, often resulting in addiction and harm:

- Obesity related conditions are estimated to cost society £27 billion per year.
- Alcohol-related deaths and hospital admission costs the NHS an estimated £3.5 billion per year in England and an estimated £1 billion per year to wider society.
- Smoking-related hospital admissions cost the NHS £17 billion a year, with hospital admissions occurring almost every minute.
- Problem Gambling is estimated to cost the UK, through associated costs, £1.27 billion per year.

Implementation of a HFSS policy aligns with considerable public support for greater powers to exist within local authority concerning the restriction of local advertising of HFSS food and drink, alongside further public health issues ²⁴:

- 68% of the public are in favour of their local council being able to restrict unhealthy food and drink advertising on council-owned spaces
- 64% are in favour of their local council being able to restrict unhealthy food and drink advertising in outdoor areas
- 54% would support banning alcohol advertising from outdoor spaces

Although LCC have a relatively small estate in terms of available advertising space, restricting advertising and sponsorship of less healthy products will lessen the adverse impact of the commercial determinants of health within the county. Lancashire clearly cannot expect to realise the same impact as in London but taking action towards improving health and wellbeing in Lancashire and setting an example is an important step.

What are the risks?

Potential economic impact: loss of advertising revenue

Lancashire County Council pay business rates for the advertisements displayed on bus stops, but we do not currently earn any revenue on them. We currently use these sites to raise awareness of positive LCC services including adoption and family support.

Even if we were earning revenue from these sites, it's unlikely the council would lose money by introducing the policy. Specific to the suggested HFSS element of the policy, there would not be an outright ban on any food or drink company from advertising, just the type of product shown. This means a company can switch out their product and still advertise. Since many local authorities are adopting healthier advertising policies, companies are familiar with this process and are complying with the new approach.

²⁴ [Addressing the leading risk factors for ill health – supporting local government to do more - The Health Foundation](#)

Of the 150 LCC owned roundabouts, evidence suggests there will be limited impact on the revenue brought into LCC given current contracts. Currently 27% of the roundabouts are sponsored by businesses in marketing and construction, 10% financial services, 9% education, 9% real estate, 8% motor vehicles and 6% currently lie vacant. Regarding HFSS advertising, 2% of roundabouts feature advertising which promote alcohol, in the form of local breweries and 0.7% promotes a local online food ordering service in which fast food options are available.

To ensure continued support of local businesses, some councils who have adopted advertising and sponsorship policies have included specific terms to support local businesses in promoting their products and services towards related events e.g., a local brewery may be permitted to sponsor a local beer festival.

Potential legal challenge to the policy

It is planned to mitigate risk by consulting our legal department using policy development and implementation process.

Risk to health of inaction

Impacts of advertising on health and wellbeing outcomes including economic impact of obesity and related disease outcomes (e.g., cardiovascular disease, diabetes), smoking and vaping, alcohol, and gambling.

Inaction limits progress on Lancashire's Healthier Places Programme

Lancashire Healthier Places Programme is LCC's whole systems approach to healthy weight and systems leadership within this. This includes the development of bespoke District Council Healthy Weight Declarations (HWD) to sit beside the LCC Healthy Weight Declaration. There is benefit to LCC taking a leadership position by demonstrating its progress against the sixteen HWD commitments, including healthier advertising.

What is the evidence for the planned approach?

It is becoming increasingly common for local authorities to have advertising and sponsorship policies. Following the success of implementing restriction on HFSS food advertising on the Transport for London system in 2019, many London Borough Councils have adopted policies in their local areas.

Outside of London, an increasing number of local authorities are introducing advertising and sponsorship policies. In March this year, Sheffield City Council introduced a policy restricting adverts for gambling, vaping, infant milk and HFSS food and drinks amongst other climate damaging products such as air travel, fossil fuels and petrol/diesel vehicles^{25,26}. Barnsley²⁷ and Knowsley^{28,29} Councils also took the opportunity to introduce wide aspects of public health into their policies. More locally, Blackpool³⁰ and Blackburn with Darwen³¹ Councils both have advertising policies in place although neither currently cover HFSS food and drink. Following a report from Sustain commissioned by the three Lancashire authorities in July 2022, there is an opportunity to work

²⁵ [Junk food ads banned from Sheffield City Council-owned billboards - BBC News](#)

²⁶ [Appendix 1 - Sheffield City Council Advertising and Sponsorship Policy 2024-2026.pdf](#)

²⁷ [Advertising and sponsorship policy 2022-2025 \(barnsley.gov.uk\)](#)

²⁸ [Knowsley Champions Healthier Choices - Knowsley News](#)

²⁹ [Appendix A - Draft Healthier Food and Drink Advertising Policy.pdf \(knowsley.gov.uk\)](#)

³⁰ [Blackpool Council advertising policy](#)

³¹ [Advertising policy: Blackburn with Darwen Borough Council | Bwd Advertising \(advertisebwd.co.uk\)](#)

collaboratively on the introduction of HFSS restrictions into all these policies utilising the Sustain Healthier Food Advertising Toolkit³².

What resources will be needed?

Wider Determinants of Health team will work with wider public health colleagues and other relevant services (e.g., Highways, Transport) within LCC to establish the scope of policy and assets available e.g. inclusion of digital information screens.

For the HFSS product element of the policy, the [Nutrient Profiling Model](#) (NPM) will be applied to assess whether a food or drink product is HFSS will be required. Subject to rigorous scientific scrutiny, extensive consultation, and review, the NPM is supported by the independent Scientific Advisory Committee on Nutrition (SACN) and has been used by Ofcom to determine HFSS products since 2007. Training in use of the NPM may be required for individuals implementing the policy.

How does it relate to other projects / workstreams?

- Lancashire County Council Healthy Weight Declaration
- Lancashire Health and Wellbeing Board Priorities
 - Healthy Hearts
 - Happy Minds
 - Best Start in Life
- UNICEF Baby Friendly Initiative
- Lancashire Healthier Places Programme
- Lancashire Smokefree Alliance
- Tobacco Free Lancashire & South Cumbria Strategy 2023 – 2028
- Smokefree Lancashire Service – including development of campaigns and educational materials, work with children and young people
- Trading Standards programmes
- Advertising opportunities in other LCC spaces e.g. libraries

Next Steps

It is recommended that this proposal takes the following progressive steps to drafting and implementation of the policy:

- Director of Public Health and Elected Member Portfolio Holder consider the proposal.
- Cabinet endorsement of the approach in requested.
- Relevant leadership teams advised.
- Corporate Strategy & Policy Team engaged to co-develop the first draft of the policy based on the policy proposal recommendations and in line with the developing corporate policy framework.
- Submission to Strategic Policy & Performance Board for oversight and agreement.
- Director of Public Health, Wellbeing and Communities, in consultation with the Cabinet member for Health and Wellbeing, to approve the policy and implementation approach.

³² [Local healthier food advertising policies | Sustain \(sustainweb.org\)](https://www.sustainweb.org/)