

MIDDLESBROUGH COUNCIL	
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Report of:	Director of Public Health - South Tees - Mark Adams
Relevant Executive Member:	Executive Member for Public Health - Councillor Jan Ryles
Submitted to:	Executive
Date:	8 April 2026
Title:	Encouraging Healthier Advertising
Report for:	Decision
Status:	Public
Council Plan priority:	A healthy place
Key decision:	Yes
Why:	Decision(s) will have a significant impact in two or more wards
Subject to call in?	Yes
Why:	Non-urgent decision

Proposed decision(s)	That executive approves the implementation of a new advertising policy that restricts the promotion of health harming products on Council advertising assets.
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Executive summary
<p>Purpose of the Report</p> <p>This report seeks approval for the implementation of a new advertising policy that restricts the promotion of health harming products on Council advertising assets.</p> <p>The policy aligns with the Council's strategic ambitions to create healthier environments, reduce health inequalities, and protect vulnerable communities.</p> <p>Why This Decision Is Needed</p> <p>Middlesbrough faces significant health challenges, including some of the highest rates of childhood obesity nationally (39.8% of Year 6 children) and adult overweight prevalence (71.4%). Unhealthy Commodity Industry (UCI) products are major contributors to preventable illnesses such as cardiovascular disease, cancer, and diabetes. Outdoor advertising is a powerful driver of consumption, disproportionately targeting deprived</p>

communities and children. Without intervention, the new national restrictions on TV and online high fat, sugar and salt (HFSS) food advertising, implemented January 2026 will likely shift marketing spend to outdoor spaces, increasing local exposure.

Recommended Option and Rationale

The proposed policy provides a clear, consistent framework for acceptable advertising, ensuring compliance with legislation and safeguarding public health. It supports the Council's Healthy Weight Declaration and Public Health Strategy, contributing to ambitions for a healthier, more sustainable, and more equal Middlesbrough. Evidence from other local authorities and Transport for London shows minimal financial impact and significant health benefits, including reduced calorie intake and improved health outcomes.

Whilst restricting advertising from health harming industries represents a clear path to improving the advertising environment in Middlesbrough, it is also important to consider how positive messages can be utilised to maximise uptake of services and activities that improve wellbeing.

Key Features of the Policy

- Prohibits advertising of HFSS foods, alcohol, tobacco, gambling, payday loans, and other harmful commodities on Middlesbrough Council advertising assets including bus shelters, lampposts, roundabouts and social media channels.
- Allows limited exceptions for public health campaigns (e.g., stop smoking or responsible drinking).
- Applies content-based restrictions rather than brand-based, encouraging advertisers to promote compliant products.
- Protects local small, medium enterprises (SMEs) through exemptions and support for compliance.

Impacts and Benefits

- Health: Reduces exposure to harmful advertising, supporting healthier choices and reducing health inequalities.
- Financial: Expected to be cost-neutral; current advertising income (~£83k/year) unlikely to be significantly affected.
- Social: Protects vulnerable groups, including children and deprived communities.

Implementing an advertising policy with restrictions for health harming products would represent a bold and progressive step in advancing Middlesbrough's whole systems approach to addressing overweight and obesity across all age groups, while championing improved population health, healthier environments, and reducing inequalities.

1. Purpose of this report and its contribution to the achievement of the Council Plan ambitions

- 1.1 Seek the approval of the implementation of a new advertising policy that restricts the promotion of Unhealthy Commodity Industry Products on Council advertising assets

Our ambitions	Summary of how this report will support delivery of these ambitions and the underpinning aims
A successful and ambitious town	<ul style="list-style-type: none"> - The policy protects local Small/Medium Enterprises by providing exemptions and additional support for compliance. This gives local SMEs greater flexibility and visibility compared to larger corporate competitors.
A healthy place	<ul style="list-style-type: none"> - The implementation of this policy would support residents to make informed choices with reduced influence from Unhealthy Commodity Industries - The policy supports our ambition to create healthier environments by limiting the proliferation of unhealthy commodity industry product advertising resulting in a shift towards a healthier advertising environment - The policy protects those living in the most deprived wards, and those most at risk of harm, where Unhealthy Commodity Industry product advertising is disproportionately targeted.
Safe and resilient communities	<ul style="list-style-type: none"> - The implementation of this policy supports a proactive systems approach to reduce crime and anti-social behaviour (ASB) by de-normalising a culture of high volume consumption. By limiting the visibility of alcohol and zero alcohol products the policy reduces environmental triggers that can lead to increased alcohol consumption resulting in public disturbances and ASB.
Delivering best value	<ul style="list-style-type: none"> - The proposed policy provides clauses to allow for high value one off events and contracts to be exempt from the restrictions via negotiated terms.

2. Recommendations

- 2.1 That the Executive:

- That Executive approves the implementation of a new advertising policy that restricts the promotion of health harming products on Council advertising assets.

3. Rationale for the recommended decision(s)

- 3.1 Middlesbrough Council does not currently have a formal policy outlining the terms under which advertising may be sought and accepted. Implementing such a policy will provide a clear, consistent, and controlled approach to advertising across the Council. Specifically, the policy will:

- Ensure consistency in decision-making and application.
- Establish clear standards for acceptable advertising content and practices.
- Provide a robust framework of controls to manage advertising activities.
- Ensure compliance with relevant legislation, industry codes, and Council policies, including brand guidelines.
- Safeguard the town's image, environment, and public health.
- Protect and uphold the Council's reputation and corporate identity.
- Support the Council's strategic vision and priorities by enabling effective communication.
- Maximise the use of Council assets to generate revenue opportunities.
- Foster positive relationships with businesses through responsible advertising partnerships.

3.2 Middlesbrough experiences poorer health outcomes and higher levels of health inequalities compared to national averages. Products from Unhealthy Commodity Industry (UCIs) – specifically alcohol, tobacco, vaping, gambling and high fat, sugar or salt (HFSS) foods – are established major contributors to the leading causes of preventable illness and premature death, including cardiovascular disease, cancer, type 2 diabetes, mental health and addiction.

3.3 The influence of UCIs extends beyond the health impacts creating a significant wider social and economic burden on the town. Specifically, the resulting harms, particularly from alcohol, increase levels of anti-social behaviour and incidents of domestic violence, placing additional strain on local police and support services.

3.4 Advertising is a powerful environmental driver of consumption. High levels of UCI product advertising in public spaces disproportionately affects vulnerable groups including children, young people and ethnic minority communities experiencing greater socio-economic disadvantage who may already be at a higher risk from UCI related harm. By limiting the exposure of the public to UCI product advertising, the council supports efforts to reduce health inequalities.

3.5 Food and drink advertising represents a substantial proportion of outdoor marketing in Middlesbrough. Between October and December 2024, 49.7% of all bus shelter advertisements across the borough were promoting food and drink products, of which 53.1% were classed as HFSS (26.4% of the overall total adverts).

3.6 The justification for prioritising the rationale for the restriction of HFSS advertising within the report's narrative reflects its status as the most prevalent category of UCI product advertising content within Middlesbrough, however the strategic importance of restricting other UCI product advertising is equally significant. The individual policy rationale for each industry is documented in appendix 1.

3.7 The advertising of HFSS products frequently carries a secondary concern regarding sustainability and high carbon emissions, often linked to the promotion of items like burgers and other carbon-intensive, non-plant-based food sources.

3.8 Due to national Government implementing the new TV and online advertising restrictions for unhealthy food advertising on January 2026, it is expected that the majority of advertising spend will shift to outdoor advertising. Government research

conducted by Kantar, shows that 26% of current expenditure on unhealthy food advertising will switch to outdoor advertising. It is therefore expected that unhealthy food advertising on Middlesbrough Council advertising assets will increase unless there is a policy to restrict it.

- 3.9 Middlesbrough has one of the highest rates of childhood obesity in the country. In 2023/24, the National Child Measurement programme (NCMP) reported 29.7% of reception aged children and 39.8% of Year 6 children are classified as living with overweight or obesity, both above the national average. Further to this 71.4% of adults in Middlesbrough are overweight (including obesity). This represents a significant challenge, not just for MBC or Public Health, but also for other key partners and organisations across Middlesbrough.
- 3.10 The Healthy Weight Declaration (HWD) was adopted by Middlesbrough Council in February 2024. The HWD provides a framework to support the implementation of a whole systems approach to obesity across four key themes, Advocacy and Leadership, Commercial Determinants, Health Promoting Infrastructure and Organisation Change and Culture Shift. Commitment Eight of the HWD refers specifically to the protection of children from advertising from the food and beverage Industry:
- Commitment 8 ‘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 controlled sites.’*
- 3.11 The proposed advertising policy (appendix 2) and associated implementation plan are the result of comprehensive co-development effort across multiple key departments including public health, transport, marketing and communications and sustainability.
- 3.12 The proposed advertising policy builds on and broadens the scope of existing restrictions included in the roundabout advertising contract which includes restrictions on alcohol and tobacco products.
- 3.13 The proposed advertising policy outlines the type of companies, partnerships, organisations or individuals that are considered unsuitable for entering into advertising agreements with as detailed in the tables below, which also include current examples of other activity that is happening locally to improve health.

Category	Advertising
Tobacco and related products	Not permitted
E-cigarettes/ vaping	Permitted only if advert is part of a stop smoking campaign, featuring a product that is not owned or part-owned by the Tobacco Industry
What Other Activity is Happening	
The Smoke-Free South Tees Service is central to improving population health and reducing tobacco-related harm. It provides evidence-based behavioural support alongside comprehensive pharmacotherapy, including the full range of NRT products and Varenicline/Cytisinicline supplied through the regional pharmacy PGD commissioned by Middlesbrough Council. The service also gives balanced, evidence-	

informed advice on tobacco and vaping as harm-reduction tools, including support through the national Swap to Stop scheme.

To maximise accessibility and reduce inequalities, support is delivered across community settings such as schools, pharmacies, faith venues, NHS and primary care sites, and substance use services, with additional telephone, evening, and 24/7 digital support via the enhanced regional Smoke Free app. This multi-setting approach ensures residents can access flexible, high-quality stop smoking support.

The South Tees Smokefree Alliance provides a coordinated, whole-system approach across prevention, protection, and enforcement. Partners from public health, the NHS, Trading Standards, environmental health, housing, community safety and education work together to reduce smoking prevalence and tackle inequalities. Activity includes targeted campaigns, priority-population outreach, smokefree environment initiatives, and enforcement against illicit tobacco, illegal vapes and underage sales. Through strong local governance and regional collaboration with FRESH, the Alliance is driving progress towards achieving 5% smoking prevalence by 2030 and a smokefree generation.

Category	Advertising
Gambling or betting products, services or organisations	Not permitted
<p>What Other Activity is Happening?</p> <p>In 2023, ADPH North East received regulatory settlement funding from the Gambling Commission to develop a three-year regional programme addressing gambling-related harms. Hosted by Middlesbrough Council, the programme brings together 12 local authorities, OHID and Newcastle University to deliver a co-ordinated public health approach across the region.</p> <p>The work is structured around eight pillars that guide planning, delivery and evaluation: Support & Partnerships; Advocacy; Media, Communications & Education; Treatment; Data; Research & Evaluation; Licensing; Protecting Young People; Lived Experience.</p> <p><u>What is the programme delivering?</u></p> <ul style="list-style-type: none"> • MECC Gambling Harms Module • Screening Questions Pilot in South Tees • Gambling Harms Leaflets & Posters • Regional Survey • Regional Gambling Harms Health Needs Assessment (HNA) 	

Category	Advertising
Foods and drinks that are high in fat, salt and/or sugar (HFSS) as defined by the Department of Health and Social Care's nutrient profiling model.	Not permitted
HFSS food and drink brands or those synonymous with, including food ordering	Not permitted

services, where no food or drink product is featured directly	
Energy drinks containing stimulants such as caffeine (150mg of caffeine per litre)	Not permitted
<p>What Other Activity is Happening?</p> <p>Middlesbrough Council adopted the Healthy Weight Declaration in 2024 to provide a framework for action for the implementation of a whole system approach to obesity.</p> <p>This includes</p> <ul style="list-style-type: none"> • Improving access to good-quality, nutritious food through the Eat Well Schools and Early Years Award, which promotes a whole-setting approach and compliance with School Food Standards. • Exploring ways to increase healthy options at council sites and events. • Collaboration with Planning to embed health in the Local Plan, including measures to manage hot food takeaway and fast-food outlet density. 	

Category	Advertising
Breast milk substitutes such as infant milk formulas, baby foods and juices for infants under 6 months, bottles and teats not permitted by the International Code of Marketing of Breast-milk Substitutes	Not permitted
<p>What Other Activity is Happening</p> <p>Stage 1 UNICEF Baby Friendly accreditation for Middlesbrough Family Hubs. Harrogate and District NHS Foundation Trust (0-19 team) Gold accredited (service operates within the Middlesbrough Family Hubs.) Achieving the UNICEF BFI accreditation includes embedding policies and guidelines to support the standards, education programme for all staff (including senior managers/leaders) to implement the standards according to their role, processes for implementing, auditing, and evaluating the standards and ensuring there is no promotion of breastmilk substitutes, bottles, teats or dummies in the family hub facilities. The standards protect and support breastfeeding in all aspects of the services and enables mothers to continue breastfeeding for as long as they wish.</p> <p>South Tees Infant Feeding Steering Group leads on a collaborative whole system approach to infant feeding, which also includes the Mamazing breastfeeding media campaign, Welcome to Breastfeed Scheme (breastfeeding friendly venues), breastfeeding boroughs commitments, data intelligence and proactive interventions to reduce drop off rates, and workforce development. This work aligns with the UNICEF BFI, ensuring that women and families receive evidence-based information and support to make informed choices about feeding their baby.</p>	

Category	Advertising
Alcoholic drinks	Permitted only if advert is part of a public health campaign, featuring a product that is not owned or part-owned by the Alcohol Industry
<p>What Other Activity is Happening</p> <p>The Recovery Solutions Young Person & Family Team is Middlesbrough Council's dedicated support service for drug and alcohol issues sitting within Public Health South Tees. Recognising the vital role schools play in early intervention and prevention, we offer a comprehensive range of services tailored to the needs of each setting.</p> <p>Our aim is to equip young people, parents, and staff with the knowledge and resources to understand and respond to current and emerging drug and alcohol trends. The recent surge in "spice" use has prompted a focused response to minimise harm. We remain committed to staying ahead of these trends to deliver timely and relevant support.</p> <p>Our school offer:</p> <ul style="list-style-type: none"> • Discreet 1:1 support • Informative assemblies • Targeted group sessions • Empowering staff training • Accessible parent/guardian support • Letters to parents • Real Time Reporting Mechanism • Onward Nicotine Vaping pathway referral 	

Category	Advertising
Loan advancers which meet the Financial Standards Authority's definition of 'High Cost Short Term (HCST)'	Not permitted
<p>What Other Activity is Happening</p> <p>Any interaction with Resident and Business Support, generally results in a financial review which would be undertaken and in line with the Councils Corporate Welfare Strategy - and involve the following:</p> <ul style="list-style-type: none"> • Review of benefits and other entitlements to maximise income ensuring residents are receiving all the benefit they are entitled to, which may include support with Housing Costs. The idea being to put more money the pocket - so aid with meeting debt obligations. • If the debt is Council tax / Council debt a review of the debt is undertaken to ensure that any relevant support such as discounts and exemptions are on the account and an affordable repayment plan put in place. • Crisis awards where required 	

- Referrals to debt support workers – CHAC, Step change or Citizens Advice
- MBC have two staff that have money guiders certification to support discussions and recommendations
- Referrals to the Community Bank who can support with low interest loans / financial reviews
- Help with Debt Prioritisation, referring into other policies such as the Corporate Debt Write Off, Section 13A etc to reduce levels of Council debt where possible

Under the Crisis Resilience Fund we are looking at how we can provide further support around debt management and money management either internally with advisors or working partners/other external organisations.

- 3.14 The restrictions in relation to HFSS do not apply to specific companies or brands. Instead focusing on the content of the advertisements, with limitations placed on the promotion of products that do not align with public health objectives. Subsequently this results in advertisers swapping out non-compliant products for products that would be compliant. For example swapping a HFSS product such as a whipped caramel frappe for a compliant product such as an iced latte.
- 3.15 HFSS is identified using the UK Nutrient Profiling Model (NPM) - a widely utilised measure which has been subject to rigorous scientific scrutiny, extensive stakeholder consultation, and review.
- 3.16 UCI products from categories that are not permitted represent a small percentage of overall advertising content, under 10%, minimising the impact of a total restriction whilst establishing a future proof policy framework that protects against an increase or change in advertising content in the future.
- 3.17 By implementing this policy, the local authority will reduce exposure to UCI product advertising, contributing to sustained improvements in population health and advancing long-term objectives for a healthier, more equitable and sustainable environment.
- 3.18 The cost of implementing the recommendations of this report is expected to be met from existing budgets.
- 3.19 The Council receives approximately £83k per annum from advertising income. While concerns around potential revenue loss are understandable, evidence from other local authorities and Transport for London (TFL) suggest the risk is low, with reports that the financial impact has been minimal whilst there has been a visible reduction in UCI product advertising.
- 3.20 Bauer Media (formerly known as Clear Channel Europe North) the current provider for Middlesbrough's bus shelter contract (including management of advertising), already works with several local authorities that have adopted similar advertising policies and is well-positioned to supply advertising content that meets healthier advertising standards.

- 3.21 Whilst restricting advertising from health harming industries represents a clear path to improving the advertising environment in Middlesbrough, it is also important to consider how positive messages can be utilised to maximise uptake of services and activities that improve wellbeing.
- 3.22 The Council benefits from an allocated proportion of advertising time on digital and static advertising boards throughout the town centre. This existing entitlement provides a valuable platform to amplify positive health and social messages as part of the proposed healthier advertising policy. By utilising this space more strategically and learning from local success such as the 'Mamazing' infant feeding campaign, the council can increase the visibility of campaigns to promote local support services and activities - helping to create a more supportive and health enhancing environment for residents and visitors.

4. Background and relevant information

- 4.1 The commercial determinants of health (CDoH) are the conditions, actions and omissions by corporate bodies that affect our health. (World Health Organisation Definition). They are the activities of private sector industries that impact us both positively and negatively by shaping the environments in which we are born, grow, live and work.
- 4.2 Unhealthy Commodity Industries (UCI) are for-profit and commercial enterprises/businesses delivering commercial products that lead to significant associated negative health consequences. Examples include tobacco, food and beverage, gambling and alcohol industries.
- 4.3 The products of these industries are linked to many chronic, non-contagious diseases (non-communicable diseases – NCDs), including cancer, heart disease, stroke, overweight and obesity, mental health. In 2019, NCDs accounted for 88.8% of all deaths in England and they make a significant contribution to disabilities and worsening health-related quality of life alongside driving inequality.
- 4.4 An obesogenic environment refers to surroundings that encourage unhealthy eating and physical inactivity, increasing the risk of obesity. One of the many factors that contribute to the obesogenic environment is the outdoor advertisement and the advertising of unhealthy food high in fat, salt and/or sugar (HFSS).
- 4.5 Research suggests that there is a relationship between the percentage of outdoor food advertising and overweight (Lesser et al, 2013). This research found that the greater the percentage of outdoor advertisements promoting products that are HFSS, the greater the likelihood of residents living with obesity.
- 4.6 Considering the current childhood obesity rates both nationally and locally, it is important that children and young people are not exposed to such advertising. Evidence in a Cancer Research UK report published in 2018, found that young people who recalled seeing junk food adverts every day were more than twice as likely to have overweight. It also reported that when exposed to HFSS product adverts, that 87% of

young people find them appealing and three in four are tempted to eat the food advertised in them.

- 4.7 Further to this evidence shows a disproportionate concentration of outdoor advertising in areas of higher deprivation. Nationally, 82% of outdoor advertisements are located in the poorest half of England and Wales, with six times more ads in the most deprived areas compared to the least deprived.
- 4.8 In Middlesbrough, where levels of deprivation are among the highest in the country, this pattern is particularly concerning. These communities are not only exposed to a higher volume of advertising but are also disproportionately targeted with promotions for unhealthy food and drink, contributing to widening health inequalities.
- 4.9 One way in which the impact of advertising can be reduced is through the implementation of an Advertising Policy that restricts the promotion of health-harming commodities on Council assets such as bus shelters, lampposts and in publications such as resident magazines.
- 4.10 The Government's Pride in Place 2025 programme clearly signals national support for local authorities to adopt advertising restrictions. By highlighting the success of Transport for London's 2019 ban and the implementation of advertising policies in Barnsley, York, and Knowsley, the programme commits to empowering councils to take stronger action against unhealthy out-of-home advertising. Working with DHSC and DCMS, a best-practice toolkit will be developed to guide implementation, demonstrating a clear expectation that local authorities lead the way in creating healthier advertising environments.
- 4.11 First introduced by the Mayor of London on the TfL network in 2019, healthier advertising policies have now been formally adopted by over 25 local authorities across the United Kingdom.
- 4.12 TfL introduced its Healthier Food Advertising Policy in February 2019 which restricted advertising of unhealthy food across their whole network. Research indicated that the new policy contributed 1000 calorie decrease in energy from unhealthy purchases in a Londoners' weekly shop (Yau et al 2022). A study led by researchers from the University of Sheffield's School of Health and Related Research, in collaboration with the London School of Hygiene and Tropical Medicine, found that the restrictions of unhealthy food advertising across the TfL network to have brought wide-ranging health benefits for Londoners.
- 4.13 The policy is likely to have had the biggest health impacts on people from more deprived areas leading to reductions in London's health inequalities. The researchers estimated that the reduced calorie intake associated with the policy could lead to 94,867 fewer cases of obesity, 2,857 cases of diabetes prevented or delayed and 1,915 fewer cases of cardiovascular disease. In turn, the lower incidence of these diet-related illnesses could then save the NHS £218 million over the lifetime of the current population (Sustain, 2022).
- 4.14 Following the successful implementation of the policy over 25 local authorities, including County Durham, Sheffield and Barnsley have now adopted their own

Advertising Policies. The inclusion of restrictions varies widely across local authorities however it is now becoming common practice to restrict the following:

- HFSS
- Alcohol and 0% alcohol alternatives
- Gambling
- Vaping products – unless as part of a stop smoking campaign
- Breast milk substitutes
- Commercial Baby Foods
- Payday loan companies

4.15 A common concern regarding the implementation of advertising policies is the potential for reduced revenue for local authorities. However, research led by the University of Bristol found that councils that have adopted such policies report that the financial impact has been minimal whilst there has been a visible reduction in harmful commodity advertising (Daly et al)

4.16 TfL announced that its advertising revenues have been unaffected by the restrictions since implementation in 2019. In the first year of the policy, revenues went up by £2.3 million, and in the second year (2020-21), despite financial losses due to Covid lockdowns at the time, the advertising revenues were maintained. Most companies have continued to market via the TfL estate by switching to advertising the healthier products in their portfolios.

5. Ward Member Engagement if relevant and appropriate

5.1 Not relevant.

6. Other potential alternative(s) and why these have not been recommended

6.1 Option 1 - 'Do Nothing' - This policy is an important component of our Whole Systems Approach to Obesity and contributes to the Public Health Strategy, most notably the commitment to Create Healthier Environments. It also supports a healthier, greener, and more equal Middlesbrough. The alternative option, 'do nothing', is not considered appropriate given the cost to the Council of preventable ill health and in the interests of the health of our residents.

6.2 Option 2 – Implement advertising policy without restrictions on UCI products – This option would miss a vital opportunity to embed a health in all policies approach as outlined in the Public Health Strategy and deliver proven public health benefits. As highlighted in the report evidence from local authorities that have implemented these restrictions show no negative impact on council revenue and a clear improvement on the advertising environment, including reduced exposure to harmful products and increased space for positive messaging.

7. Impact(s) of the recommended decision(s)

Topic	Impact
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<p>Financial (including procurement and Social Value)</p>	<p>Currently in contract with Bauer Media until 2027 therefore no changes could be implemented until the start of the new contract. Based on a study of bus shelters in Middlesbrough between October and December 2024 there is currently around 26.4% of advertisements that would no longer be allowed under the new advertising policy. The impact on current advertising income of £83k and the potential for maintenance costs falling to the council due to lack of bidders is likely to be very low based on research undertaken with 15 Local Authorities that have already adopted new advertising policies. At least three of those Local Authorities have seen their bus shelter contracts renew after their advertising policy was adopted, with Bauer remaining the provider in both Swindon (policy adopted April 2024, contract renewal January 2025) and Bristol (policy adopted May 2021, contract renewal February 2022) and the contract switching from JC Decaux to Bauer in York (policy adopted April 2024, contract renewal January 2025). Other advertising income across the borough is negligible.</p>
<p>Legal</p>	<p>The policy complies with relevant advertising, consumer protection, and competition laws and will be applied consistently and transparently to mitigate risks of judicial review on grounds of irrationality or procedural unfairness. Additionally, contractual obligations with advertisers will be reviewed to prevent breach of existing agreements.</p>
<p>Risk</p>	<p>The policy will serve as a positive driver for the Council Plan, particularly CP-01 – <i>A successful and ambitious town</i>, by promoting positive messaging that fosters a healthier advertising environment for both internal and external stakeholders. Additionally, the policy will support CP-04 – <i>Delivering best value</i> by ensuring that advertising is appropriate and by encouraging the promotion of healthier products within stakeholders’ portfolios.</p>
<p>Human Rights, Public Sector Equality Duty and Community Cohesion</p>	<p>There are no disproportionate adverse impacts on any group or individuals with characteristics protected in UK equity law. An impact assessment has been carried out and is attached (Appendix 3).</p>
<p>Reducing Poverty</p>	<p>Whilst the policy won’t directly impact or reduce poverty the implementation of the advertising policy will create a healthier advertising environment for those living in communities who are not only exposed to a higher volume of advertising but also disproportionately targeted with promotions for unhealthy food and drink, contributing to widening health inequalities. The policy includes clauses to protect local SMEs ensuring local businesses are still able to promote their products.</p>
<p>Climate Change / Environmental</p>	<p>No adverse impact</p>
<p>Children and Young People Cared for by</p>	<p>No adverse impact</p>

the Authority and Care Leavers	
Data Protection	No impact

Actions to be taken to implement the recommended decision(s)

Action	Responsible Officer	Deadline
Make all staff aware of new advertising policy through internal communication channels	Head of Marketing and Communications	30 June 2026
Engagement with procurement department to raise awareness and ensure policy is embedded into relevant procurement exercises	Health Improvement Specialist and Head of Marketing and Communications	30 June 2026
Engagement with legal department to raise awareness and ensure policy is embedded into relevant contracts	Health Improvement Specialist and Head of Marketing and Communications	30 June 2026

Appendices

1	Rationale for the inclusion of unhealthy commodity industry products
2	Draft advertising policy
3	Level one impact assessment

Background papers

Body	Report title	Date
Lesser, L.I., Zimmerman, F.J. & Cohen, D.A	Outdoor advertising, obesity, and soda consumption: a cross-sectional study	2013
Christopher Thomas, Lucie Hooper, Gillian Rosenberg, Fiona Thomas, Jyotsna Vohra	Under Pressure: New evidence on young people's broadcast marketing exposure in the UK	2018
Emma Boyland, Rosa Whalen, Paul Christiansen, Lauren McGale, Jay Duckworth, Jason Halford, Malcolm Clark, Gillian Rosenberg, Jyotsna Vohra	See it, want it, buy it, eat it: How food advertising is associated with unhealthy eating behaviours in 7 – 11 year old children	2018
Yau A, Berger N, Law C, Cornelsen L, Greener R, Adams J, et al.	Changes in household food and drink purchases following restrictions on the advertisement of high fat, salt, and sugar products across the Transport for London network: A controlled interrupted time series analysis	2023
Department of Housing, Communities and Local Government	Pride in Place Strategy	2025

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