

Women and Equalities Committee

Oral evidence: Changing the perfect picture: an inquiry into body image, HC 274

Wednesday 2 December 2020

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Members present: Caroline Nokes (Chair); Sara Britcliffe; Elliot Colburn; Angela Crawley; Alex Davies-Jones; Peter Gibson; Kim Johnson; Kate Osborne; Bell Ribeiro-Addy; Nicolas Richards.

Questions 112 - 132

Witnesses

I: Sophie van Ettinger, Global Vice President, Dove; Caroline O'Neill, General Manager, L'Oréal Paris (UK); Kelly Byrne, Commercial Director, Nasty Gal, Boohoo; Kate Dale, Strategic Lead, Campaigns, Sport England.

II: Malcolm Phillips, Regulatory Policy Manager, Advertising Standards Authority; Chris Macleod, Customer and Revenue Director, Transport for London.



Examination of witnesses

Witnesses: Malcolm Phillips and Chris Macleod.

Chair: Can I welcome our witnesses for the second panel? You may have seen some of the evidence from the earlier panel. I will ask members of the Committee to ask you questions in turn and they will make it clear which witness it is they are addressing their question to.

Q112 **Angela Crawley:** My first question is to Malcolm with regard to the Advertising Standards Authority and how it regulates advertising within the industry.

Malcolm Phillips: The ASA is the UK's independent advertising regulator. We have been operating since 1962. We have adapted over time and taken on new responsibilities, including regulation of TV and radio advertising under contract from Ofcom in 2004 and regulation of marketing communications on advertisers' own websites and space under their control online in 2011. Online display advertising has been in the ASA's remit since it was developed.

Last year we resolved 34,717 complaints about 24,886 ads. We secured the amendment or withdrawal of 8,881 ads and delivered 550,242 pieces of advice and training to ensure that businesses get ads right. We are independent, but we work in partnership with a number of statutory bodies, most notably Ofcom, not only on TV and radio but also increasingly in digital, for example on video-on-demand programme advertising and potentially, within the next quarter or so, advertising on video-sharing platforms regulated under some European legal provisions.

We also have close working relationships with the Competition and Markets Authority, notably on influencer marketing, which we have already heard about this afternoon, the Gambling Commission, the Information Commissioner's Office and the MHRA, the name of which is on everyone's lips today.

Two years ago we launched our More Impact Online strategy to further strengthen online ad regulation. As part of this, we are using technology to tackle ads that could have harmful implications, including using machine learning. Online advertising represents around 65% of our work now, but it is a diverse environment that requires equally diverse solutions. We are exploring what more we can do to address issues at the platform level. Over the summer we launched, for example, a scam ad alert system that facilitates consumer reporting of online scams, so that we can alert social media platforms and act as an early warning mechanism to get them removed.

We have a lot of experience of regulating influencer marketing now, having made our first ruling on a vlogging ad campaign back in 2015. We



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have recently been doing some tech-assisted monitoring work to try to proactively identify situations where online influencers are not being clear about the fact that they are doing marketing activity on behalf of a brand.

It is important to stress that we do not just do enforcement work. We try to think more broadly in terms of behaviour change through training, the provision of guidance and targeting awareness campaigns, like our “Love Island” cheat sheet, which we ran in collaboration with ITV, to make “Love Island” contestants aware of the rules for influencer marketing, so when contestants left the programme and took up any marketing opportunities that were made available to them, they were already aware of what they needed to do to comply with the rules.

Q113 **Angela Crawley:** There is still, unfortunately, a perception that online advertising is largely unregulated. You touched on some examples there of where an approach to advertising has potentially a negative effect on people’s body image. Could you perhaps say a bit more about exactly what the ASA can do and what it has done to tackle some of these issues?

Malcolm Phillips: Yes, absolutely. We have done quite a few rulings this year on complaints related to body image, and some of them have been particularly as a result of lockdown. A good example is a ruling that we published in October on four Instagram posts by a weight loss injection provider called Skinny Revolution Ltd. I can make a link to the ruling available to the Committee following the session. One of the posts featured a “before” image of a slim Barbie doll and an “after” image of an overweight Barbie doll alongside the caption, “Me in quarantine”. The caption stated, “Do not let lockdown knock you back. Use this time to keep working toward your weight loss goal and come out the other side looking amazing”. Hashtags included “funny”, “meme”, “weight loss” “motivation” and “lockdown”.

In ruling on the ad, we stated that people, particularly young women who were already body conscious because of pre-existing societal pressures regardless of their weight or size and including those who were of a healthy weight, were likely to have had their concerns about putting on weight heightened by changes to their lifestyle during lockdown, such as prolonged periods of staying at home and experiencing disruption to ordinary diet or exercise routines. We considered that the “before” image of a slim Barbie doll and the “after” image of an overweight Barbie doll, together with the claims, “Me in quarantine”, and, “Don’t let lockdown knock you back”, poked fun at women’s physicality and played on those anxieties. That is a key recent example of how we are tackling body image concerns in online advertising.

Q114 **Angela Crawley:** That is a helpful example. I would like to see more of that happen, in fact. The ASA review adverts on a case-by-case basis, but we have had evidence that the body image harms that might be caused might be caused by a cumulative effect of seeing adverts that perpetuate



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these appearance ideals and stigma. Perhaps you could say a bit more about how the ASA can work with advertisers to prevent this.

Malcolm Phillips: We are aware that there is a concern about potentially subtle or insidious effects of advertising, and also a concern about the volume of advertising that people see. These concerns are, of course, interrelated. We are keen to understand more about the role that advertising plays in negative body image and we are planning our own call for evidence on body image and advertising in the new year, building on the work we have done on gender stereotyping.

We recently did a public consultation on scheduling and ad placement restrictions on cosmetic interventions advertising to help limit children's and young people's exposure to that kind of advertising. We will be announcing the outcome of that work in the new year.

The example that I gave maybe helps illustrate that, while it is important to understand those subtle effects that advertising can have, we need not to lose sight of the fact that advertising frequently strives to be quite bold in its effects and makes opportunities out of real-life conditions that we experience. In terms of those more subtle effects, it is something that we will be keen to hear about when we do our call for evidence on body image.

Q115 **Angela Crawley:** It is maybe worth highlighting for your attention that a number of the young people who came forward for this inquiry outlined that the adverts that they are exposed to online have had a detrimental effect on their mental health. That is something we would like the Advertising Standards Agency to be taking far more seriously. There have been calls for the adverts to be more representative of their consumers and to show a diverse range of abilities, body sizes and ethnicities. What role does the ASA have in encouraging companies to do this? Do you have any powers to compel companies to adhere to a certain standard?

Malcolm Phillips: It is probably important to state that the system is mainly set up to tell people what not to do. Rather than requiring a particular understanding of diversity in advertising, especially bearing in mind that we do not have access to the richness of research that each brand holds that you have heard about in the last session, so far we have tended to concentrate on things like, through our gender stereotyping guidance, warning against suggesting that an individual's happiness or wellbeing should depend on conforming to an idealised gender stereotypical body shape or physical features, as well as warning against using body types that do not match stereotyped ideals in association with lack of success in one's personal life.

There is undoubtedly more for us to explore here. In particular, I would draw attention to our plans for forthcoming work on racial stereotyping. I have already heard some comments this afternoon about maybe the interplay between gender and racial stereotypes and body image. I was also interested to note the body image survey carried out by the



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Committee, which pointed to a higher risk of negative emotion about body image among women, people with a disability and transgender people.

One thing I would really like us to build into our work on body image next year is some targeted engagement with specific communities to better understand whether there is a role for us in helping mitigate those higher risks through our work. We are an evidence-based regulator and we are always open to submissions from anyone who wants to tell us how advertising affects perceptions about these issues.

In terms of what we can do to compel advertisers, we have a number of compliance options available to us to help enforce our rulings, including refusal of media space and the ability to take paid ad search links down if they link to non-compliant material. We are working increasingly closely with social media platforms to get their collaboration on helping tackle issues with organic posts, for example.

Fundamentally, I would say over time our experience has been that the adverse publicity caused by rulings is in itself an extremely effective weapon against non-compliant advertising and online actually tends to increase that effect, because of the way that rulings get reported, linked to and amplified as they spread through media attention.

Q116 Angela Crawley: I am sure the Committee will be able to make available to you that volume of evidence that perhaps will assist in your work there. Specifically, you mentioned at the beginning some of the statistics. I wondered how many adverts specifically the ASA has identified in the last year that have caused harm in how people feel about their appearance and how many of those adverts, if there are any, have been banned.

Malcolm Phillips: We tend to receive a fairly small number of complaints about body image, but some of the work that we have done on tech-assisted monitoring, for example, is probably relevant here. In January we issued an enforcement notice to 130,000 wide-ranging businesses across the beauty and cosmetic services industry about ads for Botox, which is a prescription-only medicine, so advertising is against our rules and indeed the law. We identified a trend of these ads appearing in social media, particularly in organic Instagram posts, and we took action to ensure advertisers reviewed their advertising and, if necessary, made immediate changes. We used monitoring technology to identify where these ads were appearing on Instagram and flagged them with the platform to have them quickly removed, making it clear to advertisers that continued to break the rules that they risked being referred to the MHRA or their professional regulatory body.

Angela Crawley: Just as a final point from me, there are grave concerns about certain social media companies. I know my colleague will come on to that, but I hope the ASA will do more in this field, because it is absolutely required.



Q117 **Alex Davies-Jones:** My colleague just mentioned I would like to press you a bit more on your work with the social media companies. How does the ASA currently regulate advertising on social media and how are you expecting this to change when the Online Harms Bill is finally produced?

Malcolm Phillips: In terms of how we currently regulate ads on social media, it is a combination of consumer complaint work, which continues to be very important, but also the tech-assisted monitoring that I mentioned, where we increasingly try to use machine learning to identify where there are mentions of terms that are likely to be problematic, for example, or we use avatar work to mimic the behaviour of certain types of users in order to check what kinds of ads are being targeted at them, most obviously to check that advertising for age-restricted products is not being targeted at children inappropriately.

There are various compliance projects that we have been doing, including monitoring of influencer marketing. There is quite a big concerted project on that in the last few months to check and find undisclosed marketing among influencers across social media. We will be reporting on that in the new year.

In terms of the Online Harms Bill, we understand that the Government are going to assign Ofcom responsibility for enforcing a duty of care on companies that facilitate the online sharing of user-generated content and that online media in scope of the legislation will be required to have appropriate systems and processes in place to tackle harmful content carried on their services.

At the time of writing it seems that is unlikely to apply to any significant extent to the creative content audience targeting of ads carried by companies falling in scope of the regulation, because it seems to be limited to user-generated content and to specific types of harm typically unrelated to advertising, like terrorist content or incitement of violence. The extent to which harms associated with underage exposure to legal content, so children accessing inappropriate material, relates to advertising remains to be seen.

At the moment we do not expect massive changes from the Online Harms Bill, but we are not relying on that either. We want to do more and more work ourselves to explore how we can hold platforms to account and work with platforms to improve the systems that they have in place to deal with specific advertising matters.

Q118 **Alex Davies-Jones:** That is really good to hear that you are not waiting for it, because we are all going to be waiting a long time at the moment for this Bill to be brought forward. It is good to know that you are just getting on with the work at hand.

I wonder if you could talk to us a bit more about exactly what work you are doing with the social media companies. You have touched on it quite a lot in your recent answers, with the work with Instagram, TikTok and



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Snapchat to tackle body image concerns. You have mentioned that there are going to be new strategies developed in the new year. I wonder if you could tell the Committee a bit more about that. That would be really good.

Malcolm Phillips: I am a little limited in what I can say about some of that right now. I can say that we are exploring a quite unusual potential model of holding platforms to account. That would be unusual in the way of our ordinary work to the extent that in non-broadcast media we tend, first and foremost, to be dealing with the brands; ASA decisions tend to be enforced against brands, because the brands ultimately have responsibility for the content of the advertising and for all of the arrangements that result in the advertising that appears in social media, including influencer marketing. We are doing this extra piece of work to try to explore whether there is potential for us to work directly with platforms rather than brands.

I touched on it at the very start, but there is this incoming piece of law, the Audiovisual Media Services Regulations, which were passed at the end of September, which include some requirements on video-sharing platforms to put various systems in place, including age verification systems and systems that require users to state when they are uploading something that constitutes marketing. That would include influencer marketing. VSPs—video sharing platforms—then have to make sure that is adequately disclosed to users of their sites, as well as having to ensure that advertising under their control conforms to certain basic standards. Ofcom has publicly announced its intention to designate the ASA as the enforcer of those advertising rules for video-sharing platforms, so again that would involve us in a much more direct way in regulating platforms.

Q119 **Alex Davies-Jones:** That is good to know. You mentioned that the good case example that you had that you recently brought forward was against the so-called skinny injections. We have seen that misinformation is a common feature on these posts about extreme dieting and so-called thinspiration, which are some of the other social media trends that have a huge negative impact on body image, as we all know.

We are also seeing the same problem with misinformation in relation to the coronavirus pandemic with all the anti-vax information that has been pushed out there towards us at the moment. Again, we know the Online Harms Bill is unacceptably delayed, but what would you like to see from the Government and social media companies in the short term? You have mentioned some of the work that you are doing in the short term, just getting on with the work, but what would you like to see from them to try to counteract this happening?

Malcolm Phillips: We have done a lot of work this year to deal with advertising that we thought was unreasonably seeking to exploit the coronavirus pandemic, including various bogus health treatments. Again, I can follow up with details of the enforcement work that the ASA has done during the year on that. I imagine that the very important



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remainder of what needs to be addressed there is more on the editorial side and we just do not really get involved in talking about that. It is beyond my competence to really touch on that issue.

Q120 **Alex Davies-Jones:** Whose competence is that? Where does that responsibility lie, in your opinion?

Malcolm Phillips: As I understand it, Ofcom is going to get that responsibility for regulating this material.

Q121 **Alex Davies-Jones:** Until that comes into force, it just falls through the gaps.

Malcolm Phillips: I mentioned this incoming law. Ofcom is going to be designating us to perform advertising-related regulatory activity. Ofcom already is going to be doing regulation on the editorial side on video-sharing platforms in connection with editorial material, so it is not just a question of waiting for the Online Harms Bill.

Q122 **Kate Osborne:** In your written evidence you say that you work to tackle misleading, harmful or offensive advertisements. Can I ask you to define "harm" in this respect?

Malcolm Phillips: That is a really key question. The thing that I would say is that we need to get specific about this. There are specific harms that can arise from specific advertising treatments. When we think about this, we tend to think of vulnerabilities. A very important part of our work and the work of the Competition and Markets Authority over the last few years has been trying to understand that concept of vulnerability a bit more as it relates to consumers, and to try to get away from a static view of some consumers always being vulnerable and others not. It would be fairer to say that people go through perhaps transitory stages of vulnerability and it is important for us to understand those in order to target advertising interventions where they are really necessary.

One of the things that we explored when we were doing our work on gender stereotyping, for example, was that mothers in the very early stage of motherhood were particularly vulnerable in terms of their self-perception and whether there was a specific need to warn against advertising treatments that might exploit that vulnerability by, for example, promoting or projecting an ideal view of what a young mother should be like. That is an example, hopefully, that illustrates the need for us to think, as I say, in quite specific ways about what harms arise.

The survey that the Committee published, as I say, shows us some directions for our inquiry to go in in the new year, in terms of looking at specific impacts, because there we start to get away from a generalised notion of the audience and we start to get towards specific audience groups that might require specific forms of thinking, to really think about what their vulnerabilities might be and how we can mitigate that.

Q123 **Kate Osborne:** Can I ask you what industries are considered high risk



for body image advertising? What do you do to ensure ads from these industries are not creating body confidence issues?

Malcolm Phillips: We do not tend to conceive of particular sectors of advertising as high risk. There are sectors of advertising that require a particular level of protection, so for example gambling or alcohol advertising, where there are important legal restrictions and important vulnerabilities for us to bear in mind. We do not regard sectors as high risk in quite that way. One of the interesting and complex things about body image is the extent to which it extends beyond any one sector of advertising.

We have certainly, as I say, done some rulings recently that have concentrated in the area of weight loss injections, for example, and I mentioned an example of one of those earlier, but depictions of bodies are everywhere in advertising. We need to be adaptive and we need to understand that problems can arise anywhere where somebody depicts a body in an ad and somebody seems to be suggesting something about a potential ideal connected with body image.

Q124 **Chair:** Just as a follow-up question to Malcolm, would you not consider adverts where prescription-only products are injected into the face to be high risk?

Malcolm Phillips: Yes, that is fair point, given that, as I say, Botox should not be advertised. It is a prescription-only medicine. That would certainly be high risk, yes, and that is reflected in the work that we have done to proactively identify those ads and take them down.

Q125 **Elliot Colburn:** Malcolm, you can take a breather. I am going to move on to Chris for a few questions, but I will come back to you, Malcolm, so we are not quite done. Chris, you may have heard some of the evidence from the first panel about the financial and commercial effect of changes to advertising policies. We have heard anecdotally as part of this inquiry that it may well be the perception of loss of revenue that might lead some companies to change their advertising policies in the way that TfL has done to be mindful of perpetuating body image concerns. My starter for 10 for you, Chris, would be about what impact this change in policy has had on the advertising revenue for TfL.

Chris Macleod: Good afternoon, everybody. We introduced the body image clause within our existing overarching policy in 2016 and until the recent pandemic impact we had seen a rising level of advertising revenue for our estate. That is not to say, however, that the restrictions on body image might not have affected that. It is very hard to break out a particular policy element, given that the total revenue picture is made up of thousands of advertising decisions made by hundreds of companies, but you would have to say that it would be pretty hard for us to say there has been any reduction in revenue as a result of introducing that particular clause that we did.

Q126 **Elliot Colburn:** I only because you say it is difficult to put a number on



it, but in 2018 TfL's finance and performance committee estimated that £13 million of revenue was lost in the junk food ban. Is there not a way to extrapolate the figures that the body image policy change might have had on revenue?

Chris Macleod: No, not really. There are two things. This is not a discussion about the junk food restrictions, but, again, even in the year that they were introduced, our revenue actually increased and we did not see those estimates come through, probably because they were done on a theoretical basis. The difference between the body image restriction and the ad ban on HFSS is one is a subjective ruling around a type of advertising. The body image clause did not stop any advertising. It just said, "Change or look at the style in which you are doing the advertising for these products", whereas in the HFSS area arguably there were some categories of advertising that did not meet the food regulations so therefore could not be advertised. Even in that situation, people could substitute products, whereas in the body image one they could simply present their product in a more acceptable way. Again, there is much less likely to be a revenue impact there.

Q127 **Elliot Colburn:** I want to come back on to this difference between these two policies and the impact that they might have in terms of their implementation, but again, just focusing on the cost, the Mayor was quite heavily criticised at the time of the introduction of the junk food ban because of the impact that it was having on revenue, not least of which because TfL's own business plan was not just calling for a replacement of the lost revenue, but for a 51% increase in advertising costs. Notwithstanding the difficulties that there have been with the coronavirus pandemic and the impact on TfL's finances, how does TfL plan to replace that lost revenue and fulfil its obligations in the business plan to increase it?

Chris Macleod: I can only say what I have said before. Apart from the pandemic impact, there was no evident substantial impact of the HFSS restrictions. In the year in question the revenue went up. It is very hard to really know about particular decisions and why a particular company may or may not have advertised. We are talking quite a lot about HFSS here, but there is quite a bit of evidence of companies that were able to substitute. Without naming names, they had a lower-fat, lower-salt or lower-sugar alternative, and that product was simply substituted and the advertising continued.

Clearly, what we will be doing as we emerge from the pandemic, as we are now and we are seeing our revenues build back, is continuing to promote the network. In terms of things like body image, the competition that we run to promote the network is one that is open, diverse and the sort of place that people would want to advertise. We are creating an environment where brands would want to present themselves. These sorts of changes are attractive to many advertisers. They are not necessarily putting them off but are making them say, "That is the sort of place or the sort of London I want to advertise in".



Q128 Elliot Colburn: I will move on to that focus and ask a bit more about how this change in policy has been received by Londoners and what work TfL has done to understand a bit more about the impact of these. Again, I do not want to keep harping back to HFSS, but it is an interesting comparison, because, again, there were problems with the implementation of that change in advertising policy that were not necessarily intended, where the Mayor was compared to Scrooge because things like mince pies and even Macmillan's coffee morning were not allowed to be advertised, the latter because it featured cakes. Again, how can we ensure that policy changes like this achieve their intended effects?

Chris Macleod: Can I just clarify: are you asking me about body image now or are you asking me about HFSS?

Elliot Colburn: I am asking how the body image change in policy has been received by Londoners and how it has been implemented without unintended consequences.

Chris Macleod: I understand that. As I say, the change was made in 2016. It would be fair to say that, apart from the concerns at the time, it has been pretty successful. If you judge it partly on the revenue, it would appear to have had little or no impact on revenue. We have had literally no complaints about advertising. We have completely rejected outright about four ads as a result of the policy.

We have learned the importance of communicating, collaborating and working in partnership with the advertisers. We are not a censor and the way we work is not binary. People do not submit stuff and we say yes or no and that is it. We will work with people. We work with the Advertising Standards Authority and the Committee of Advertising Practice and seek guidance from them as well.

At the same time the policy was introduced we established an Advertising Steering Group. That was an independent body that the Mayor asked us to establish, which did not have decision-making powers, but we would report to them and work with them. They would give us feedback and we are a very transparent organisation. We would say, "These are the ads that we have run. These are the complaints we have had. How do you think we are doing?" As I say, when you look at the low level of complaints, the low level of rejections and the generally positive way in which the policy has been accepted, it would suggest that it has been a success.

Q129 Elliot Colburn: Apart from the measurement by level of complaints, could I ask a bit more about the kinds of tests TfL has been using to see how successful the policies have been? Do you do things like market research and have feedback? What kind of feedback was there in the press, for example, in London about the policy? What sorts of things have you managed to do?



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Chris Macleod: Again, it is a very interesting question. It is something that we have discussed at the Advertising Steering Group, because in a sense its success is like that expression about the dog that does not bark. The success is in what you do not see. You do not see the complaints. You do not see the controversy of it. You see generally more and more ads that are diverse and representative.

We do not do market research directly about that particular policy. It would be quite difficult and costly to do that, but there has been a lack of controversy, complaints and concerns about it. Having said that, I am sure there is still progress to be made and things that can be done going forward.

Q130 **Elliot Colburn:** Malcolm, if I can bring you back in now having had a break, having seen the example from Transport for London, what is stopping the ASA from adopting a similar policy to reduce body image concerns and pressures on adverts across the UK in every sector?

Malcolm Phillips: It is always open to a media owner to establish their own standards and views on what they want to carry in advertising in their channels. It is a very different matter for a regulator to impose controls that will then be enforced on a mandatory basis, and that is what the ASA does. The ASA treats the contents of the CAP and BCAP codes as mandatory and enforces them against any advertising that we consider to be in the remit of the codes. That involves us necessarily in important legal and regulatory considerations.

The ASA system is subject to judicial review. Not only its individual decisions on investigations but also our decisions to impose rules can be reviewed in a court of law, because we are treated as a public body for the purposes of the regulation that we do. It is important for us to follow processes like public consultation and the evidence-based policymaking approach that has been adopted in the UK through successive Administrations over the last 20 years. It is important for us to demonstrate that our restrictions are necessary, proportionate and prescribed by law.

It is to that end that we are doing the work that we are doing in planning a call for evidence on body image, and it is to that end that we did a public consultation exercise, for example, on rules on scheduling and ad placement on cosmetic interventions advertising, which has now concluded. We are evaluating the responses to that at the moment. We have that kind of accountability for the controls that we impose.

Q131 **Chair:** Chris, you spoke about the Advertising Steering Group. Can I ask how somebody gets appointed to that? How large is this group? They may not have decision-making powers, but they can certainly give advice and I would just be interested to understand a little better how that works.



Chris Macleod: The Mayor appointed a chair and then the chair invited members from a wide range of organisations, such as from Stonewall, other charitable groups and the advertising industry, but the view was that they were there as informed individuals, not necessarily stakeholders for their own particular sectors. There are about half a dozen members. I am not a member. I serve the group, along with our media contractors. We employ sales agents to sell the advertising space on our behalf and we act as a secretariat to the group and prepare reports.

We have always produced an advertising report for the last few years; before the steering group was established but also since the steering group was established we produce a report. We are a transparent and accountable organisation. That report will say how many ads we have run; we run something in the order of 24,000 ads every year. It will say how many complaints we have. It will say what will happen to those complaints and what they were about. It is not just about complaints. We will also say how we are investing in the network and so forth.

We meet three or four times a year. The chair will establish an agenda. We started with body image as a topic we particularly looked at, so we always return to body image. We say, "These are the sorts of ads that we have had. These are the issues we have had. These are any of the complaints we have had". Body image became quite an uncontroversial topic and we moved on to look at other things, not trying to find things to ban and reduce, but just saying how we could make the network more representative and accountable.

For example, we look at the advertising competition that we run. We started two or three years ago an advertising competition to promote diversity in London, the idea being that brands and agencies could come forward, submit ads in the competition on a particular theme and the winner would receive free advertising space on the TfL estate, which is actually quite a high value of advertising, to promote that issue.

The first competition was themed around women and how women were represented in advertising. It was underpinned by some research that we commissioned. That was very successful. We then looked at the BAME audience last year, again using the research and again trying to promote the question of diversity. There is quite a lot of evidence that women, BAME and other groups are not necessarily well shown in advertising and we wanted to champion that. This year the competition has been around ageing and how the ageing population is presented in advertising.

The steering group would comment on that. It has guided us on the HFSS and junk food policy, and we have looked at other topics. The TfL estate is very large and very visible. From time to time we get questions about issues such as human rights and property rental; different topics come up and we discuss those at the steering group.

Q132 **Chair:** Thank you for that. That is really helpful and there are some interesting topics for the competition. They certainly show a breadth of



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diversity. The steering group is all appointed then. Is there gender balance on that? Are BAME communities represented on it?

Chris Macleod: They certainly are. We are in a process of probably refreshing the membership of that, but that is a decision for the chair, not for me. My sense is that it is representative as it can be in a relatively small group. It is not a big group but it is representative, and that was the intention of establishing a steering group.

Chair: Thank you very much for that. That is very helpful. Can I thank both witnesses for your contributions this afternoon? They have been most helpful and interesting.