



TfL Advertising Policy

Ads must

Be socially appropriate ...

Not cause Offence by way of implication

Not promote poor Body confidence

Not depict in a sexual manner

Comply with TfL's Public Sector Equality Duty



Bart Sindrewicz @CryptoNewsjunki · Sep 27
I love ass



TfL Schedule 9 Content Codes:

The Copy and Images of Newspapers must

Comply with the law

Not incite anyone to break the law

Not cause widespread or serious offence

Not depict in a sexual manner

Ads on TfL

- Women's groups to be involved in helping to end sexist advertising
- Women's groups to be included on the Advertising Steering Group
- Whole-culture understanding of the attitudes underpinning violence against women and the harm of objectifying advertising
- This to include not only the Steering Group and other relevant decision makers but, where possible, urging billboard hoarders, decision makers at companies and their advertising companies that habitually submit objectifying ads (a cost-effective way to ensure appropriate advertising)
- Find new ways to advertise lingerie and swimwear
- Improved Pre-Vetting
- A Proper Complaints Procedure
- Publicise how to Complain
- Work with other transport networks (UK-wide/internationally) to encourage similar best practice

Sex Ads & Sexualised Content in ES/Metro

- Ban ads for any aspect of the porn/sex trade including sex chat and 'chat or date' in any newspapers freely distributed on TfL's network
- Amend Schedule 9 Content Codes for Newspapers, if necessary
- Work with Met to investigate legality of organisations placing such ads
- Work with Support Services to help women out of the industries advertised
- Ensure 'classifieds' to not turn into *de facto* prostitution ads
- Ensure ES and Metro also end gratuitous, sexualised copy
- Encourage other transport networks to do the same
- Ensure press coverage, to encourage all newspapers to stop advertising the porn/sex trade and stop its objectifying content

We outline here how and, we suspect, *why* there are still sexist ads on the London transport network, despite excellent codes and an apparently strong commitment to tackle such 'anti social' material.

TfL Advertising Codes

These can be found here: <http://content.tfl.gov.uk/tfl-advertising-policy.pdf>

But key features are:

2.3 An advertisement will not be approved for, or permitted to remain on, TfL's services if, in TfL's reasonable opinion it

is **not socially appropriate** or is inconsistent with TfL's obligations under section 149 of the Equality Act 2010 (**the Public Sector Equality Duty**). More particularly, an advertisement will be unacceptable if:

2.3 (a) it is likely to **cause widespread or serious offence** to reasonable members of the public on account of the product or service being advertised, the **content or design** of the advertisement, or **by way of implication**.

(b) It depicts adults or children in a **sexual manner** or displays nude or semi-nude figures in an overtly sexual context. (While the use of underdressed people in, for example, underwear advertising, may be appropriate, gratuitous use of images of an overtly sexual nature will be unacceptable.).

(d) could reasonably be seen as likely to cause pressure to conform to an **unrealistic or unhealthy body shape**, or as likely to create **body confidence** issues particularly among young people;

How Ads Breach TfL Codes



All the ads (pre-vetted and approved by TfL) featured in this report could be said to fail TfL's strict advertising codes. We have analysed this one alone, from Pretty Little Things. That is because one of our recommendations is a wider understanding by TfL staff and advertisers themselves of the root causes of violence against women and the wider pornographic context in which adverts sit. This ad particularly well exemplifies why such an understanding is needed.

We outline below the numerous ways this ad breaches TfL's codes and should never have been pre-approved. Much of this we phrased in a complaint to TfL, from which we received a standard, template email response telling us the ad was code-compliant and to complain to the ASA:

2.3a) 'Offence': It clearly is likely to cause offence, particularly to black women, to parents and those from different cultural and religious backgrounds – a substantial portion of London's travellers. Apart from anything else, this is promoting an incredibly racist stereotype of 'the large assed black woman'.

2.3a) 'Offence by way of implication'

Why, exactly, do these ads show women leaning forward to present prominent back sides? When we met with TfL Commercial Development Chiefs we were told that companies often try to 'get around the rules' when they can. This is *exactly* what those marketing clothes to young women persistently do and exactly what Pretty Little Things has done, apparently successfully, here.

A large number of people, especially young people who are major consumers of porn and pop videos, will be well aware of how this image is directly linked to the racist misogyny of both (see 2.3d).

2.3 b) 'Not to depict adults .. in a sexual manner'. This clearly has sexual connotations even to a passer by not versed in the typical pornographic images of (black) women.

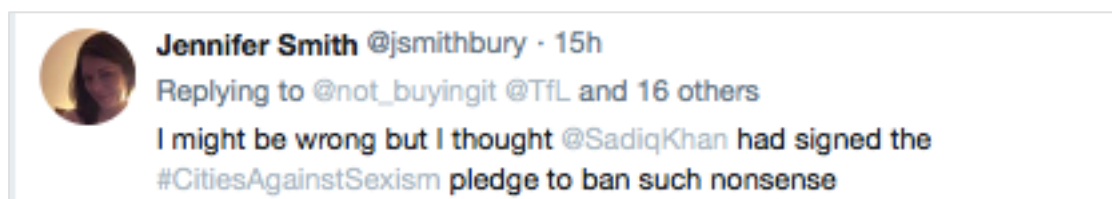
2.3 'Breaching the PSED'. It very arguably breaches the PSED (Public Sector Equality Duty) under which TfL is LEGALLY required to seek to ELIMINATE harassment, discrimination and victimisation of protected groups (e.g. black people and women. Black women obviously being a particularly hard hit group). This includes TfL's responsibility to its *own staff*, particularly black women. Ads like this *are* a form of sexual harassment in the workplace – just as the viewing of porn or even Page 3 newspapers have been argued to amount to sexual harassment at work.

2.3d) 'Promoting Poor Body Image'. This ad arguably promotes poor body image and pressure to conform since amongst young BLACK WOMEN the pressure is NOT to be anorexically thin but to be 'large assed'. This is because black women are constantly shown near naked twerking in pop videos – for which a large back side is almost a pre-requisite and THEY are the brunt of the most abusive porn – where black women are depicted with a large 'porn ass' and where the abuse invariably involves viscous anal/double anal sex.

The way the women are 'presenting' their backsides in this image is instantly recognisable to all who view pop videos or consume porn.

Those not versed or attuned to the world of MTV and porn might not pick up on this – including TfL's decision makers. That is why it is important for all those involved in decision making are not only trained on the reality of the porn and sex trade but empathetic to the issues these raise. Given that approval for all 'suspect' ads appears to rest on the shoulders of one man (the Customer Director, Chris MacLeod) with a background in business not human rights or feminism, we ask how this is even possible.

Sexist Ads Undermine Countless Commitments



There are countless Mayoral, GLA, police and even TfL policies and initiatives that are totally undermined by the presence of sexist advertising:

The Mayor - a Feminist?

Sadiq Khan is well known for declaring himself a Proud Feminist. How do sexist ads fit in with this?:

<https://www.telegraph.co.uk/women/politics/proud-feminist-sadiq-khan-unveils-plan-make-london-best-city/>

Mayor's VAWG Strategy

The Mayor has pledged a record £44mil to tackle violence against women and challenge the sexist and misogynistic *attitudes* that lead to such violence. But creating and cementing misogynistic attitudes is exactly what sexist advertising does:

<https://www.london.gov.uk/press-releases/mayoral/mayors-strategy-to-tackle-violence-against-women>

'Respect and Safety At Work'

How can women (and with regard to the Pretty Little Things ad, especially black women) feel safe, respected, equal, validated and non victimised in an environment with ads like this?

Breach of PSED (and possible sexual/racial harassment) for TfL's own Staff

TfL is legally required to pay due regard to the need to seek to ELIMINATE harassment, victimisation and discrimination of protected groups – ie women and ethnic minorities including black women.


Such ads are also a possible illegal breach of the PSED towards TfL's own staff (women, black women and men). TfL could be taken to tribunal by its staff by consistently allowing ads such as this.

Breach of PSED for TfL Travellers

The PSED equally applies to TfL's travellers.

Suzzan Blac @SuzzanBlac · 18h
Replying to @not_buyingit @TfL

Why on earth would @TfL need an explanation for sexually objectifying women in adverts, when they know that women suffer extensive sexual harassment on London Transport, and according to their OWN source, 90% don't report it. Can you please answer this?



100 Women: Undercover in London, catching harassers on the Tube

TfL 'Equality Campaigns'

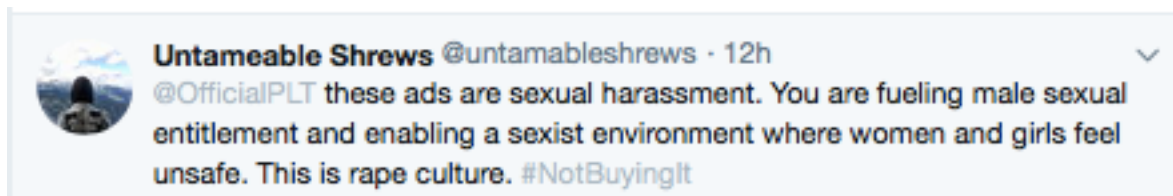
Current promotions by TfL to promote diversity (eg Behind Every Great City etc celebrating 100 years of women's suffrage) are hugely appreciated and important. They are marred by the presence of clearly sexist, inappropriate ads.

TfL Tackling Harassment

TfL's campaign to encourage women to report unwanted sexual behavior on London transport, is undermined when sexist ads, pre-approved by TfL, amount to little more than a form of, officially endorsed, harassment:

<https://www.campaignlive.co.uk/article/transport-london-every-report-helps-build-picture-vccp/1427271>

Understanding Needed of WHY Objectification is Harmful



There needs to be a genuine whole-organisation understanding of why objectification and stereotyping is harmful. This is not about 'snow flakes' being offended by a bit of flesh. This is about a constant re-iteration and *re-affirmation* of women's function and status in our society. It might sound like an exaggeration to say sexualised and objectifying ads is 'rape culture' but if you think about it, actually, that is exactly what it is:

This is about the messages being signalled to the 1 in 3 women who are sexually assaulted, experienced domestic violence or stalking. This is about the messages being given to the 100% of women (and girls) who are harassed, including frequently on the transport network.

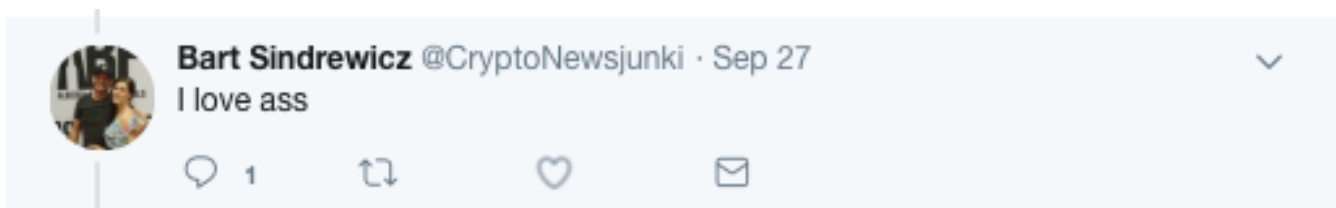
This is about the messages sent out to men and boys who are already bombarded with a culture of 'toxic masculinity' - an overwhelming sense of superiority over women, disrespect and sexual entitlement whether from the covers of newspapers or abusive online porn.

This is about the messages that such advertising sends out to children and young people, to foreign visitors, to a hugely diverse population of travellers.

This is about creating a safe space, a positive, inclusive environment.

And, always, it needs to be remembered that the purpose of ads is to sell, to make money. Advertisers, who spend large sums of money on the psychology of marketing, should never be able to over ride TfL's duty to women, girls and all the travelling public.

These are the kind of attitudes TfL is promoting:



Women's Groups Involvement

We were in contact with TfL as the new advertising codes and its steering group was being created. Despite a long track record on this issue (we helped push for TfL's initial advertising codes 15 years ago) we were not invited to provide input. This feels like a wasted opportunity.

We ask if any women's groups or experts, such as ourselves, with a similar track record on this issue were consulted with. And why they are not either part of the TfL's advertising steering group or, at very least, regularly presenting to it.

The steering group, admirably, has representatives from the LGBT and race rights community but not a women's right representative. Given that sexist advertising has always been *the* most complained about aspect of advertising to the ASA - second only to the sexualisation of children - this seems to be an unhelpful omission. The presence of Dr Diedrichs, an expert in body image, goes some way to alleviating this but, given the continued presence of sexualised ads on the network, we would suggest that this might not be enough. We urge for:

- Women's Rights Groups & other experts in this field to be involved at all points: on steering groups, providing consultancy, training and support at all possible points.
- This to be over specific issues (eg it is welcome news to see that Dr Diedrichs presented on body image to the committee : <http://content.tfl.gov.uk/mayors-advertising-steering-group-minutes-july-2017.pdf>). The Committee needs similar issue specific presentations eg over the nature of porn and pornographic style imagery.
- The Committee should also seek presentations more generally around the harm of stereotyping and objectifying advertising on children and adults alike.
- All those involved in TfL's advertising (including billboard hoarders, such as JC Decaux) should attend similar presentations, including conferences that highlight violence against women and girls, toxic masculinity, the contributing factors and the effect of stereotyping on all, including victims of abuse.
- We would urge for this to include decision makers at the 'worst offenders' (such as BooHoo, Pretty Little Things and their advertising creators). If execs here understand the wider context of violence against women and the attitudes that shape it, they might desist from objectifying advertising – saving TfL considerable time and money and, indeed, the advertisers themselves.

Underwear/Swimwear Ads – Automatic Code Breach



There is an inherent problem with underwear/swimwear ads as typical advertising of it almost cannot fail to be objectifying or promote poor body image (given the bodies used in such ads, are representative of less than 1% of the female population). This is true whatever the intent of the advertiser (although, in most cases sexualisation is a clear 'sales tactic').

This has been an issue for some time for TfL. At one stage there was a consideration not to allow large 'bikini ads' on the backs of buses, where the sheer scale of (funnily enough, always sizeable) cleavage could not but fail to be sexualising.

We urge TfL to work with women's groups, advertisers and feminist-orientated advertising companies to find a way around this problem. Why show (always highly unrepresentative) bodies at all? It is certainly not to give buyers a 'sense of how it would look on them' since the overwhelming majority of potential purchases will never look like a size 8 model with a DD chest in a bikini.

Why not just show the product? There are so many ways this concept could be used to create imaginative, positive advertising that *does not* 'body shame', objectify or sexualise.

Cosmetic Surgery Ads – Automatic Code Breach

When we met with TfL bosses we were told that cosmetic surgery ads that showed ‘before/after’ imagery would not be approved. However, surely all ads for cosmetic surgery, regardless of any imagery used, automatically breach TfL’s codes not to ‘body shame’. They are all telling women (mostly) that their own bodies are unfit and inappropriate and all telling women to undergo needless (and, where it goes wrong, often disfiguring) surgery or procedures (such as Botox) to ‘fix them’.

In light of this, we urge TfL to ban all cosmetic surgery ads.

Reliance on ASA Decisions

Since TfL has (and has had for some 15 years) greatly superior advertising codes to the ASA’s we ask why it appears to rely on ASA decisions to inform its own?:

eg for this Forza ad: <http://content.tfl.gov.uk/mayors-advertising-steering-group-minutes-july-2017.pdf>



Similarly, TfL did *not* uphold complaints about this, surely clearly inappropriate Kardashian ad: <http://content.tfl.gov.uk/mayors-advertising-steering-group-minutes-july-2017.pdf>.

Is that because the ASA (with an appalling understanding of sexism) did not uphold complaints?:



The response to our recent complaint to TfL over the Pretty Sexist Thing ad also appears to suggest that TfL is relying on ASA guidance on which ads to accept – and using its approval to justify and inform TfL's view on acceptable advertising (Appendix 2).

Pre Vetting

Although rigorous 'pre approval' might be in operation this clearly appears to be failing on occasion: <http://content.tfl.gov.uk/advertising-steering-group-minutes-feb2018.pdf> This could be improved through:

- Appropriate pre-vetters in adequate numbers. From our understanding with TfL chiefs it appears that one individual carries out all pre-vetting of any 'suspect' ads. Furthermore this is carried out by looking at small copy of ads, with a clearly very different impact from a the often life-size final product.
- We would argue that one individual cannot possibly carry out this work appropriately.
- The individual who we were informed carries out such pre-vetting is Customer Director, Chris MacLeod, with a background in business and a large portfolio. But this task clearly needs to be carried out by individuals dedicated to this role alone - with clear 'feminist credentials' who is fully empathetic towards, and committed to prevent, the harm of stereotyping, sexualisation and objectification.
- Women's groups should be involved (eg providing consultancy training) or even helping with pre-vetting, if need be, of any potentially sexualising advertising.
- 'The Usual Offenders' (eg young women's clothing companies) should be pre-warned to cease sexualised advertising and should be particularly closely monitored.

A Complaints Procedure

There currently is *no complaints procedure*

Individuals who complain are responded to within a very short space of time with a template email that merely tells them that all ads are pre-vetted and thus approved according to TfL's 'strict' codes' and to complain to the ASA if they don't like them. In other words, there is no complaints procedure by any accepted understanding of the term, ie for a complaint to be lodged, the appropriateness of the ad to then be investigated and a considered response received. There appears to be no clear means for the travelling public getting an inappropriate ad removed. When we tried to escalate our initial complaint, our message appeared to disappear into a vacuum. This, surely is a breach of one of the primary underlying principles of the Advertising policy - for a 'clear and transparent complaints *procedure*' (as stated on page 3 of TfL's Advertising Policy).

Instigate a proper complaints procedure:

- This requires a team made up of appropriately informed, empathetic individuals who deal with and assess all complaints and investigate the appropriateness of the ad in question from scratch, regardless of whether it has been pre-approved and who respond to complainants, regardless of

outcome, in a supportive manner.

- It also requires on going training (eg consultancy with expert women's groups with teams attending relevant events on women's rights, sexism in advertising etc to gain real insight into *why* inappropriate ads are problematic).

Improved response letters:

From meeting TfL chiefs and seeing minutes of the Advertising Steering Group's meetings it appears complaints and specific ads are monitored, and on occasion discussed and potentially acted upon. At very least this information could be conveyed to complainants, rather than the public being left feeling almost insulted with a standard response letter (ie ignored).

Falsely Positive Data?

TfL's steering group has already noted a low number of complaints: <http://content.tfl.gov.uk/mayors-advertising-steering-group-minutes-february-2017-draft.pdf>. We would suggest that this will particularly be the case for sexist ads, for the reasons outlined below. Low reporting is giving TfL a false sense of positivity over public feeling. The fact that the 'Beach Body Ready' ad (hardly the most sexist or offensive ad approved by TfL), sparked such controversy suggests, in part, a groundswell of anger and frustration over inappropriate advertising that this ad tapped into.



Indeed the social media comments we received over the Boohoo and Pretty Little Things ads featured throughout this document (Appendix 1), suggest that this is very much the case. It should be pointed out that some of these are from known survivors of male sexual violence.

Beth Khan Yes, saw this ad the other day on the tube. This company has always used unnecessary sexualized images in it's marketing predominantly aimed at teenage girls as the consumers which annoyed me but this particular ad felt like a step too far... it's a fashion shoot not a glamour shoot! They are intentionally blurring the lines.

TfL's own advertising policy states there will be a clear and transparent complaints procedure, however we feel this is still very much lacking. Indeed, we would assert that there currently *isn't* a complaints procedure. The ASA, for all its very many faults, does at least have a complaints procedure in place and this could be one thing where lessons could be learnt by TfL.

Unclear there *is* a Complaints Process

If it is not clear that people can even complain about advertising, TfL will be receiving falsely low levels of complaints. TfL should inform the public that sexist ads are not tolerated eg through an advertising campaign (on line and/or with physical posters) as carried out by Ken Livingstone in the 1980s. The Mayor could also make a statement to this effect This appears to have been touched on previously by the steering group <http://content.tfl.gov.uk/mayors-advertising-steering-group-minutes-february-2017-draft.pdf>:

Members said that TfL could do more to make its customers aware of issues and challenges around advertising and lead on encouraging more appropriate advertising more widely.

Unclear Complaints *Process*

TfL advertising codes champion a 'clear and transparent' complaints procedure. But Currently the ability to complain about advertising is extremely unclear. The online complaints system is geared towards travel issues it is not at all clear how to complain about advertising. A distinct category on the online complaints form specifically for advertising would help.

Attrition due to *Poor* Complaints Process

Another reason TfL may receive a low number of complaints *particularly* regarding sexist ads, is because of the process of attrition warred on complainants when expressing concerns over sexist advertising. The ASA has an appalling understanding, and track record, of dealing with such ads. In fact the EHRC is currently investigating the ASA after we raised concerns. When TfL then reiterates this, with a standard email response and no apparent real complaints procedure (as highlighted here), this simply adds to this attrition effect.

Costings, Added Benefit and other ideas

- **Costs:** Additional costs could perhaps be carried by advertisers, particularly those who create the most work for TfL (with inappropriate ads) – this will add extra impetus for such advertisers to 'get it right'.
- **The Good Ad Awards:** Perhaps a simple, fun award could be offered to the best 'feel good' ad or ad campaign – companies that throw off stereotypes and prevent an alternative world vision. You could ask people to vote for their favourite ad. You could also ask them to vote for the worst



Perhaps even more concerning are the ads for 'sex chat' and prostitution ('chat or date') in the newspapers, The Evening Standard (ES) and The Metro, that TfL allows to be distributed across its network.

It is shocking that TfL or any newspaper allows such ads when these ads should be used to alert the police to the undoubted whole scale criminality and abuse by the businesses which are running them.

Why These Ads are Unacceptable

The Laws on prostitution are summarised here: <https://www.legislation.gov.uk/ukpga/2003/42/section/52>

- The definition of Prostitution is 'the provision of sexual services in exchange for money, goods or services' A Paid-For 'Date' is prostitution. Similarly 'Sex Chat' is clearly a form of prostitution.
- It is illegal to profit from the prostitution of another or to cause or incite prostitution. The companies behind these ads are clearly profiteering from prostitution. They are also clearly inciting the use of prostitution. Given the highly abusive way these industries and their pimps operate they are also very likely to be inciting the women involved to prostitute themselves – the transition from 'sex chat' to 'paid date' is spelt out in black and white).
- It is illegal to solicit in a public space (yet that is exactly what these ads do.)
- Trafficking or coercion of sexual services is also illegal.
- The Met Police and the Trade Body for the press called on newspapers to drop such ads half a decade ago by because of their links with trafficking. Since then 'coercion into prostitution' has also become a criminal offence.
- Sir Alan Caton, former Suffolk Chief of Police, ensured local press stopped carrying sex ads following the serial murders of women in prostitution in Ipswich.
- Even if no recognised crime is taking place, the sex trade - in all its guises - is hugely abusive.
- Newspaper sex ads normalise and legitimise the sex trade in the most mainstream manner imaginable - encouraging use of, and fueling demand for, the highly abusive sex trade.

We go into considerable (fully referenced) detail into this information here :
<https://www.notbuyingit.org.uk/sites/default/files/ASA%20EHRC.pdf>

Breach of TfL's Newspaper Codes

TfL's Schedule 9 Codes (Appendix 3) state The Copy and Images in the Newspaper must :

a) comply with the law and not incite anyone to break the law

We have already outlined how this is being breached above.

b) not be likely to cause widespread or serious offence to members of the public or sections of the public

We would suggest such ads cause serious offence (ie triggering distress) to women who have escaped the sex trade, to many women who have been harassed and abused and are offensive and of concern to many parents and many from different cultural backgrounds.

d) not depict in a sexual manner

Sex ads, regardless of the imagery, are obviously depicting women in a sexual manner – they are selling women for sex.

e) not depict or refer to indecency or obscenity

Although we would not use this language ourselves, the sex trade is 'indecent' and 'obscene' because of the harm associated with it and the effect it has on wider social attitudes. You could also argue that sex chat - men masturbating to strangers talking to them for money - is 'offensive' in the more traditional sense of the word.

f) condone or provoke anti-social behaviour and/or violence

As already outlined, such ads most certainly do condone violent, anti social behavior – including to children (the buying of prostitutes, the majority of whom are violently abused by punters).

The fact that TfL has Schedule 9 codes makes it clear that TfL has a degree of control over the content of the newspapers it allows to be distributed on its network. If these codes need to be re-written to specify permitted advertising then surely they can be. We would argue that TfL has the absolute authority to decide what papers benefit from its substantial distribution network and attach certain criteria to that. This is in no way an infringement of 'freedom of the press' – promoting porn and prostitution or the sexualisation of women is not, and never has been, a press 'right'.

It is absolutely incongruous that TfL specifically disallows ads for porn and prostitution in all other aspects of marketing but is allowing it in 'its' newspapers.

Newspapers sex ads pose a clear issue of child protection

- Large numbers of children read newspapers
- No child should be exposed to the porn/sex trade
- They breach the ethos of child protection under the Serious Crime Act
- Sex ads in a newspaper are clearly likely to incite underage young people to 'use such services'
- They provide an easy 'grooming aid' to paedophiles (porn/sex ads in newspapers make it, quite literally, 'child's play' for any abuser to suggest this is totally normal to his target).

Breaching & Undermining of TfL, Mayoral & Government Codes and Intent

- These ads breach TfL's Advertising codes, Newspaper 'Schedule 9' codes and it's PSED, both to those viewing these ads and to those being sold in the ads.
- We have spearheaded a successful legal case against a council for its pro strip club licensing. When the legal expert who led this heard about these porn and sex ads in Metro and ES she was horrified and immediately suggested this could be a breach of TfL's PSED.
- They undermine all Government, Mayoral and even international efforts to clamp down on the hugely abusive porn and sex trade, such as:

Ending Children's access to Porn

Online porn is already 'opt in' and is soon to be age verified – to end children's access to it. It is absurd that prostitution is advertised in a newspaper.

Ending Website advertising of Prostitution

The USA is already prosecuting those who advertise prostitution online and the UK is likely to follow suit soon. Allowing such ads in TfL-endorsed newspapers is totally incongruous with this.

<http://www.bbc.co.uk/news/technology-43699203>

<https://www.theguardian.com/society/2018/jun/30/ban-prostitution-websites-stamp-out-trafficking-sexual-exploitation>

Ending Craig's List/Back page-style 'rooms for sex' ads

The Government has reissued guidance that 'rooms for sex' as advertised in Craig's List and elsewhere is illegal profiteering from the prostitution of another. But THAT Is exactly what the advertisers in Metro and ES are doing – and, indeed what the newspapers themselves are guilty of.

Clamping down on Consuming Porn on TfL

Siwan Hayward, TfL's Head of Transport Policing, has been quoted as saying:

"We do not tolerate any unwanted sexual behaviour on our transport network.

"If someone has made you feel uncomfortable, for example by viewing pornographic material, please tell the police or a member of our staff."

It is absurd that, on the one hand TfL is, rightly, clamping down on men watching porn on London transport and yet at the same time allowing ads for the porn/sex trade in the newspapers it endorses on its network.

Clamping down on Sexual Harassment

The Mayor is quoted as saying when talking about sexual harassment and men masturbating on public transport:

"By working together with partners, we can .. give women and girls the encouragement they need to come forward. .. I urge Londoners to speak up and report unwanted sexual behaviour to the police immediately."

https://www.huffingtonpost.co.uk/entry/tfl-campaign-urges-women-to-report-sexual-harassment_uk_58c6a62fe4b0ed71826df9ac?guccounter=1&guce_referrer_us=aHR0cHM6Ly93d3cuZ29vZ2xILmNvLnVrLw&guce_referrer_cs=99-faCQ8jf200biwi-_0Sw

Allowing sex ads in TfL-endorsed newspapers totally undermines the ethos of clamping down on sexual harassment.

Other Inappropriate Content

TfL Schedule 9 Codes clearly suggest that TfL has some powers over newspaper copy as well. Both the ES and Metro, but most particularly the Metro, use gratuitous sexualised content. Metro's 'Guilty Pleasures' often seems to be little more than a soft porn section.

Metro content over 2 consecutive days in Aug 2017




The Evening Standard's recent Halloween offering was simply a gratuitous 'breast fest'. The sexualised images of children's cartoon characters is particularly striking:




Given that both are the ES and Metro are free newspapers, not reliant on providing salacious titillation to boost sales, such content seems particularly unnecessary. There is a real opportunity for intervention here to improve the standards in both these papers by TfL.

Appendix 1: This is What the Travelling Public Think of Sexist Tube Ads


These social media posts are from women, parents and outspoken survivors of child and adult sexual abuse. They expose what many women and parents think, the vast majority of whom don't complain, not least because it always seems to 'fall on deaf ears':

**Suzzan Blac** @SuzzanBlac · 18h
Replying to @not_buyingit @TfL
Why on earth would @TfL need an explanation for sexually objectifying women in adverts, when they know that women suffer extensive sexual harassment on London Transport, and according to their OWN source, 90% don't report it. Can you please answer this?




90% of unwanted sexual behaviour on London transport goes unreported (Source: TfL)


100 Women: Undercover in London, catching harassers on the Tube

**Gahh Yee** @GahhYee
Replying to @not_buyingit @TfL and 16 others
Seeing women presented like pieces of meat (and this line of ads is consistently bad) makes tube platforms an unfriendly environment for women. I do my best to distract my young daughter from these images - constant awareness and defensiveness in public is tiring and tiresome!

2:08 AM · 27 Sep 2018


3 Retweets 6 Likes


**Untameable Shrews** @untamableshrews · 12h
@OfficialPLT these ads are sexual harassment. You are fueling male sexual entitlement and enabling a sexist environment where women and girls feel unsafe. This is rape culture. #NotBuyingIt


**Felis Catus** THANK YOU for posting this. I've been horrified by their ads for a long time. The idea that young impressionable girls and teens are seeing these images is disgusting and the images are just degrading to women as a whole. All this while desensitising the public to pornographic images.


Like · Reply · Message · 1w

1

**ScottishFeminist** @BunterHelen · 2h
Replying to @gemma_brett @not_buyingit and 16 others
I think we possibly don't complain enough. I do complain to the ASA (Poundland elf Xmas campaign which was upheld) but I would spend a considerable amount of time each day if I complained about everything I saw.

**Beth Khan** Yes, saw this ad the other day on the tube. This company has always used unnecessary sexualized images in it's marketing predominantly aimed at teenage girls as the consumers which annoyed me but this particular ad felt like a step too far... it's a fashion shoot not a glamour shoot! They are intentionally blurring the lines.

**Jennifer Smith** @jsmithbury · 15h
Replying to @not_buyingit @TfL and 16 others
I might be wrong but I thought @SadiqKhan had signed the #CitiesAgainstSexism pledge to ban such nonsense

**Kajsa** @kajsa_skog · Sep 30
Replying to @not_buyingit @TfL
I saw this walking from South Kensington to the museums recently, with my two young daughters. So many kids walk through there, I hate that this is being normalised for them. Thanks for what you're doing, I'm complaining too.

Thank you for your email of 18 September about advertisements seen on London Underground.

To ensure adverts are appropriate for our customers to view, we give them a lot of consideration before they are displayed on our network.

I'm sorry the advert campaign by Prettylittlething.com has caused you offence in any way.

All adverts in relation to them were reviewed in line with the Transport for London Advertising policy deemed to comply with all requirements.

The adverts were also reviewed by CAP (the Committee of Advertising Practice) who regulate advertising in the UK - they confirmed that all Prettylittlething.com adverts complied with the UK Code of Non-broadcast Advertising and Direct & Promotional.

As a result of this, they were approved to run.

If you still have concerns about the advert, you can contact the Advertising Standards Authority via their website- www.asa.org.uk/asa

Thanks again for contacting us. If there is anything else we can help you with, please reply to this email. Alternatively, you can call us on 0343 222 1234 and we'll be happy to help you.

Appendix 3: TfL Schedule 9 Codes on Newspaper Copy and Images

These were sent to us from TfL during out dealings with TfL in 2016:

SCHEDULE 9 **Content Guidelines**

The copy and images in the Newspaper must:

- a. comply with the law, and not incite anyone to break the law.
- b. comply with the Code of Practice of the Press Complaints Commission (for content);
- c. not be likely to cause widespread or serious offence to members of the public or sections of the public;
- d. not depict men, women or children in a sexual manner, or display nude or semi-nude figures in an overtly sexual context;
- e. not depict or refer to indecency or obscenity, depict bodily functions, nor use obscene or distasteful language; or
- f. condone or provoke anti-social behaviour and/or violence.

In addition, all advertisements in the Newspaper must comply with the British Code of Advertising, Sales Promotion and Direct Marketing (as such code may be amended or replaced from time to time), other relevant guidelines produced by the Advertising Standards Authority.