

Diversity Impact Assessment

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| Advertising and Sponsorship Policy |
| |
| 4 April 2024 |
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1. Summary description of the proposed change

Since our Advertising and Sponsorship policy was first agreed in 2018, an increasing number of councils have been amending their policies to reflect national ambitions and challenges such as health and wellbeing and climate change, which are also key priorities for Medway. The current policy allows advertising content and sponsorships that would undermine the Council's objectives around public health and climate response. The proposed revised policy now incorporates amendments setting out new restrictions around advertising content and sponsorship opportunities to enable the Council to meet its priorities in particular for foods that are high in fat, sugar and salt (HFSS) and high carbon products and services. There are also other minor amendments recommended relating, for example, to the approval processes and branding.

2. Summary of evidence used to support this assessment.

The Council's new proposed One Medway Council Plan has five priorities and a number of principles that underline those priorities. Enjoying Clean Green, Safe and Connected Communities and Improving Health and Wellbeing for All are two of our priorities and Climate Response is one of our underpinning principles.

Medway has a high level of obesity rates across both adults and children. Medway Council has a responsibility to implement programmes to reduce obesity along with the development of a Whole Systems approach to Obesity (WSO). Part of the WSO is to inject health into all policies (HiAP) by reviewing and recommending changes across all council policies to support the reduction in our Medway obesity levels.

HFSS adverts make these products more appealing and influence young people particularly to make less healthy food choices. A 2018 Cancer Research UK study estimated that seeing just one extra HFSS advert per week led to the consumption of 350 additional calories. Unsurprisingly, there are associations between outdoor HFSS advertising and obesity. The advertising spend for cakes, biscuits, confectionary and ice creams is twenty times that of healthy food. As such, it's highly likely that unregulated advertising sites frequently expose residents to HFSS adverts.

The child obesity epidemic affects more than just a child's physical health. This policy is part of a whole system approach and a good example of health in all

policies. The child obesity epidemic has implications for both the affected individuals' emotional and mental development, as well as their social interactions. But it also has repercussions for the economy in terms of the wellbeing of a future workforce and the NHS. Recent estimates show that £66bn could be saved over the course of a child's lifetime if child obesity was brought down to 1980s levels. In addition, in 2018, the government committed to halving child obesity by 2030. At that point, 1 in 3 children were overweight or obese by the time they left primary school and this is still the case today. That means a lot of work needs to be done over the next decade.

Adult obesity is strongly correlated with worse Covid outcomes. The pandemic has given fresh impetus to reducing adult obesity due to its strong correlation with a higher risk of worse Covid outcomes. Some research puts the increased risk of death by Covid for obese patients at 48%.

Research from the London School of Hygiene and Tropical Medicine examined data from two million grocery purchases of HFSS products to examine the impact of the policy in London. It found households purchased 1,000 fewer calories from HFSS products per week a reduction of 6.7 per cent. Chocolate and confectionary saw the largest decrease.

A number of other councils have now also implemented restrictions on HSFF advertising including Brighton, Bristol, Liverpool, Haringey, Merton, Southwark, Barnsley and many others.

Research commissioned by Badvertising and Adfree Cities in 2023 emphasised the strong legislative background to introducing such carbon producer restrictions, given that the need to reach net zero carbon emissions is part of the UK's primary legislation, and that the UK's latest carbon budget makes explicit recognition of the need to reduce demand for high-carbon activities.

The review concluded that it is within local authorities' power to adopt policies that include such restrictions. It considers the legal risks to be limited and the prospect of successful challenge to be low. The review also acknowledges that effective local authority precedents are already set and working in practice.

3. What is the likely impact of the proposed change?

We anticipate that the potential impact on residents is to promote greater health equalities across all Medway residents.

| Protected characteristic groups (Equality Act 2010) | Adverse impact | Advance equality | Foster good relations |
|---|----------------|------------------|-----------------------|
| Age | No | Yes | NA |

| | | | |
|-------------------------------------|-----------|------------|-----------|
| Disability | No | Yes | NA |
| Gender reassignment | No | Yes | NA |
| Marriage/civil partnership | No | Yes | NA |
| Pregnancy/maternity | No | Yes | NA |
| Race | No | Yes | NA |
| Religion/belief | No | Yes | NA |
| Sex | No | Yes | NA |
| Sexual orientation | No | Yes | NA |
| Other (eg low income groups) | No | Yes | NA |

4. Summary of the likely impacts

It is hoped that there will be a long-term potential positive impact on the health of Medway's population from introducing these restrictions and the potential reduction of reliance on healthcare services in the longer term. Research from the London School of Hygiene and Tropical Medicine examined data from two million grocery purchases of HFSS products to examine the impact of the policy in London. It found households purchased 1,000 fewer calories from HFSS products per week a reduction of 6.7 per cent. Chocolate and confectionary saw the largest decrease. People with a disability or long-term health condition may be particularly vulnerable to health issues related to poor nutrition so restricting processed food advertising could benefit them. Similarly, protecting children from processed food marketing is essential for their wellbeing. Some people, particularly from marginalised communities, often bear the brunt of climate change impacts more than others so reducing support for non-renewable energy companies can indirectly benefit them. Some religious or cultural practices influence food choices so restrictions should be mindful of this, advertising and sponsorship play a role in representation, so again need to be mindful that the restrictions do not impact on inclusivity.

5. What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?

We will seek to work with new advertisers and sponsors to widen the range of healthy and low carbon products and services promoted through our channels.

6. Action plan

Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence

| Action | Lead | Deadline or review date |
|--------|------|-------------------------|
| | | |

7. Recommendation

It is recommended for the health and wellbeing of all Medway residents to proceed to approve this amended policy.

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8. Authorisation

The authorising officer is consenting that the recommendation can be implemented, sufficient evidence has been obtained and appropriate mitigation is planned, the Action Plan will be incorporated into the relevant Service Plan and monitored

Assistant Director

Date of authorisation