OUTDOOR ADVERTISING

POLICY ARRANGEMENTS IN THE EAST OF SCOTLAND

East of Scotland Partnership
Prevention & Remission of
Type 2 Diabetes Programme

Obesity Action
Scotland
Healthy weight for all

Table of Contents

Executive Summary

In recent years, various local authorities across the UK have introduced advertising policies restricting the advertising of foods high in fats, salt and/or sugar (HFSS)[1,2]. However, with these initiatives currently being limited to England, little is known about the subject in the Scottish context. This research aimed to understand the influence local authorities have on outdoor advertising in the East Region of Scotland. It also explored the benefits, opportunities, risks and challenges associated with potentially introducing local health-protecting advertising policies.

The project involved analysis of local policy documentation and interviews with 11 people working across four local authorities. The project was developed in a partnership between Obesity Action Scotland and the East of Scotland Partnership's Prevention & Remission of Type 2 Diabetes Programme and was funded and supported by the Scottish Government. The work was undertaken between December 2020 and March 2021.

Key findings:
1. Local authorities have the most influence on the outdoor advertising spaces which they own.
2. Local authorities with larger population densities and higher footfall own more outdoor advertising spaces than more rural local authorities.
3. Some local authorities have local advertising policies but none explicitly mention restricting unhealthy foods.
4. Introducing health-protecting advertising policies was thought to be the responsibility of elected members, the NHS and the Scottish Government.
5. Designing and implementing health-protecting advertising policies was seen to be multi-sectoral and relevant partners may include local authority departments, national bodies, food industry representatives and advertising partners at various stages.
6. It was recognised that health-protecting policies may encourage healthier behaviours and promote economic opportunities for local businesses. However, there was hesitancy to implement reported by respondents as the evidence for the health impacts of outdoor advertising was not well understood.
7. A number of risks were associated with potentially introducing local health-promoting advertising policies including threats to revenue and challenges around resource management.
8. There was a strong interest in a national approach to such a health-protecting policy across local authority and third party assets to mitigate concerns around consistency, local revenue losses and health messaging.

Recommendations:

- Local authorities may benefit from an increased understanding of the role advertising plays in food purchasing behaviour and other health-related impacts.
- A more thorough understanding of this evidence may help inform local policy and practice.
- In addition, more research could be undertaken on the health impacts of other forms of advertising that residents are exposed to in the East of Scotland, such as TV advertisements.
- A national health-protecting outdoor advertising policy may prove beneficial to allow for a consistent approach across all local authorities.

1. Introduction

1.1 Obesity Action Scotland

Obesity Action Scotland (OAS) was established in 2015 to provide clinical leadership and independent advocacy on preventing and reducing overweight and obesity in Scotland.

One of OAS' priority issues is to see mandatory action on various forms of advertising of foods high in fats, salt and/or sugar (HFSS) including outdoor advertising. This could have a significant impact on the obesogenic environment that surrounds us every day and encourage us to make poor dietary choices. OAS is keen to see progress on the commitment made in the Scottish Government Diet and Healthy Weight Action Plan around pursuing restrictions on the outdoor advertising of HFSS foods.

1.2 East of Scotland Partnership

The East of Scotland Partnership (EoS) is leading a regional approach to prevent Type 2 Diabetes (T2D) by mobilising the full resources of all regional partners within the statutory and non-statutory sectors. The partnership includes all Health Boards, Local Authorities (LAs) and Health and Social Care Partnerships across Fife, the Scottish Borders, Edinburgh and the Lothians.

As part of their work within the Children and Young People (CYP) workstream, an implementation group was initiated with the responsibilities of a project board to initiate and enact work towards the programme's strategic goals. This board has introduced several initiatives aimed at meeting the national standards for child healthy weight and scoped a number of prescient research arms for the prevention work of the EoS.

The prevention research projects include work on the quality of health visitor data collected across the region, scoping existing school initiatives and examining the outdoor advertising of foods across the region.

The East Region planned to undertake research into the extent of outdoor advertising of HFSS foods in areas with high footfall of children and young people. However, this work was delayed as the advertising environment saw a substantial shift during Covid-19 pandemic with substantial space allocated to public health messaging. This was not felt to be representative of the normal advertising environment.

1.3 Research context

This report will sit alongside a larger body of evidence to better understand issues around the advertising of HFSS foods in the East Region of Scotland.

In recent years, various LAs across the UK have displayed interest in introducing healthier food advertising policies which would restrict the advertising of HFSS foods[1,2]. This followed a similar approach taken by Transport for London in 2019 which restricted advertising of HFSS foods and drinks across their entire transport network to address high childhood obesity levels [3].

In Scotland's Diet & Healthy Weight Delivery Plan, the Scottish Government recognised the impact of the food environment on food decisions. It highlighted the importance of shifting advertising practices towards healthier options by engaging with LAs and transport companies to develop a code of practice to restrict advertising of HFSS foods[4].

This report also complements work published by the University of Glasgow and the University of Stirling, which mapped adverts on bus stops/shelters around schools and supermarkets in Edinburgh and West Lothian[5].

This report, funded and supported by the Scottish Government and developed in a partnership between Obesity Action Scotland and the East of Scotland Partnership's Prevention & Remission of Type 2 Diabetes Programme, is designed to better understand the policy mechanisms currently available to help mitigate health risks associated with the outdoor advertising of HFSS foods[5].

1.4 Aim

A four-month piece of research was funded to gather data on LA's management and administration of outdoor advertising in the East Region of Scotland. This research focused on local policy levers that could restrict potentially harmful content and encourage health-promoting content within outdoor advertising spaces.

2. Methodology

2.1 Study definitions

The following definitions have been utilised in this study from existing published definitions, advertising industry reports as well as through the initial research conducted in this study.

Term	Definition	Notes
Advertisement	Advertisement is described as "any word, letter, model, sign, placard, board, notice, awning, blind, device or representation, whether illuminated or not, in the nature of and employed wholly or partly for the purposes of advertisement, announcement or direction".	As defined in the amendment of the Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984
Outdoor advertising spaces	Advertisements that are intentionally displayed outdoors.	This includes digital and non-digital advertising on billboards/large hoardings, phone kiosks, bus stops/shelters, window displays, public transport (e.g. buses, trains, their tickets), advertising on taxis etc. It does not include traffic signs, timetables, warning notices, advertisements displayed inside buildings (with the exception of public toilets) and packaging of products.

Table 1: Study definitions

2.2 Research aim and objectives

Aim: Explore the management and administration arrangements of outdoor advertising in east region of Scotland.

Objectives:
1) To establish the scale of LA owned and/or controlled outdoor advertising spaces (e.g. billboards, bus shelters etc.);
2) To better understand relevant local policies;
3) To understand the scale and potential impact on LAs if changes to advertising legislation and/or policy were to be made; and,
4) To understand the local decision-making process through which health-related advertising policies could be introduced and to identify likely drivers of intervention decisions.

2.5 Design

The study was conducted across four LAs within East of Scotland Partnership: The City of Edinburgh Council, Scottish Borders Council, Fife Council and West Lothian Council. The project utilised a

qualitative research approach to allow for the complexities of this subject to be explored by evaluating the perceptions of those working in the relevant departments within the LAs[6]. All commonalities noted between the LAs are reflected in the report whilst also applying critical thinking to analyse the relevance of the findings.

2.6 Sampling

The eligibility criteria for this study required that respondents be employees from different departments across each of the four LAs in this study. This purposive sampling method was selected to ensure the project was able to appropriately explore the outdoor advertising environment in east region of Scotland and the perceived potential impact to LAs in the event of advertising legislation or policy changes. The perceptions of LA employees who work in this area were considered to be crucial in informing this research. The researcher relied on expert input from gatekeepers from each LA who hold executive positions in the LA to identify the relevant departments. A total of 11 respondents from four LAs were included in this study (Table 2).

Number of respondents (n=11)	Associated local authority
4	The City of Edinburgh Council
2	Scottish Borders Council
4	Fife Council
1	West Lothian Council

Table 2: Respondents and their affiliated local authority

2.7 Data collection

Two complementary methodological approaches were used to better understand the management of outdoor advertising and the perceived impact of potential policy changes:

- Data enquiry to explore
  - local authority owned and/or controlled outdoor advertising spaces
  - related revenue generated
  - any associated contract details
  - relevant local advertising policies and any recent changes
- Interviews to explore
  - the scale and potential impact on LAs in the event of changes to advertising legislation or policies
  - the process and inclination to implement and/or amend local advertising policies

Data collection took place remotely using Microsoft Teams complying with COVID-19 related restrictions in place at the time. In all instances, data enquiry requests were made to confirmed respondents prior to commencing interviews using the following questions:

- How many, if any, outdoor advertising spaces does the LA own and/or control?
  - Where are these located? Please give details
  - How much revenue (per year) are these spaces expected to generate?
  - Are there any current contracts in place to manage these advertising spaces?
    - How often are these contracts renewed?
    - When are the contracts due for renewal?
    - Are there any advertising conditions on the contracts currently?
    - What types of reporting/monitoring mechanisms are in place for the contract? Do you receive frequent reporting on implementation of the contract?
- Currently, are there any relevant local advertising policies in place?
  - What changes, if any, have been made to these policies in recent years? If so, when were changes implemented and by which division?
- Have there been instances where advertising permission has been granted or denied based on advertising content beyond public safety and amenity? If so, please expand.

Interviews were approximately 45 minutes long. This was deemed appropriate due to the remote data collection method and feasible time afforded by respondents. Interviews were recorded with permission to allow for appropriate engagement throughout and will be deleted before publication of this report. A semi-structured style was followed using a pre-determined question guide (Appendix XX). Data were collected using information provided by study respondents through both phases of data collection and known advertising company websites such as Ocean, Clear Channel, JCDecaux, Primesight and Global Media.

2.8 Data analysis

The researcher familiarised themselves with the data through noting initial reflections and transcribing the audio recordings of interviews. A data-driven codebook was developed in NVivo based on these initial reflections. Data were thematically coded into short words or sentences, categorised into common themes and summarised using the codebook, which was amended accordingly as new themes emerged (Table 3). Quotes that appropriately represented each theme were reported in the results.

Main themes	Sub-themes	Related objective
Influence	Differences across local authorities	Objective 1
	Local authority owned outdoor advertising spaces	
	Third-party outdoor advertising spaces	
	Local policies	Objective 2
Process	Idea generation	Objective 4
	Design	
	Implementation	
Impact	Benefits	Objective 3
	Opportunities	
	Risks	
	Challenges	
	Drive and inclination for local policy	Objective 4

Table 3: Study codebook and related objectives

2.9 Ethical considerations
No formal ethical approval was required for this study however, it adhered to generally accepted ethical standards of ensuring informed consent, confidentiality and ensuring benefits of this study outweighed potential harm (which was considered minimal)[7]. Approval for the study was sought from each LA from executives within the authority, e.g. Executive Directors of Place, Resources, Head of Planning etc, prior to data collection. An informed consent checklist was used by the researcher to document consent for the study at each stage (Appendix 2).

An audit trail has been described to establish confirmability of study findings (Appendix 3). Reflexivity was employed to mitigate bias in this study.

A Research Advisory Group was created and was involved in validating and governing the study. The advisory board consisted of members of the East of Scotland Partnership, Obesity Action Scotland and The Scottish Government. The research was also overseen by the East Region Children and Young People Board.

Confidentiality was ensured for interview respondents throughout the study. This was done to allow for honest discussions.

3. Results

Eleven local authority representatives participated in interviews over four months. The findings related to the scale of outdoor advertising in the included LAs, LA's influence on local outdoor advertising, LA's potential to implement local health-protecting policies, and the potential impacts of introducing such policies.

3.1 The scale of local authority owned and/or controlled outdoor advertising spaces

The scale of ownership and control of outdoor advertising spaces varied amongst LAs (Tables 4 and 5). Expectedly, LAs reported having the greatest control over the outdoor advertising spaces that they owned. Furthermore, because advertising was more prevalent in areas with high population density, urban LAs (e.g. Edinburgh) owned considerably more outdoor advertising spaces and had greater industry influence than rural authorities (e.g. Scottish Borders)**.**

The size of LA owned and controlled advertising estates also fluctuated over time. For example, all respondents cited a recent reduction in the number of outdoor advertising spaces their authority owned. However, the cause of this change varied across the region:

o   Rural LAs noted a reduction due to insufficient commercial viability of the outdoor advertising spaces and decreased interest from the advertising industry resulting in the removal and/or refusal of advertising spaces such as billboards, telephone boxes and bus shelters; and,

o   Urban LAs with higher footfall also noted significant reduction in outdoor advertising spaces of up to 30% however, these were largely attributed to the shift from analogue to digital advertising which allowed for rotation of adverts resulting in a decreased need for multiple physical outdoor advertising spaces.

Universally, all LAs planned to expand the scale of their current advertising (table 5). Some of these expansion plans, for example Fife's, were found to be part of a well-coordinated and data-led campaign to ensure Scottish LAs derive commensurate revenue from their assets. However, once again, there were found to be varying motivations for any intended expansion. For example,

o   In LAs with higher population density (e.g. Edinburgh) the motivation to develop the advertising estate was attributed to income maximisation and keeping their facilities as commercially attractive as their competitors.

o   In small-sized LAs, such as Scottish Borders, it was spoken of in terms of under-utilised assets and by the need to promote local businesses in order to aid economic recovery for small businesses and the LAs themselves post COVID-19.

3.2 LA's influence on outdoor advertising spaces

The influence on new outdoor advertising spaces was perceived to be the same as existing outdoor advertising spaces with reliance on ownership and licencing agreements.

Overall, LAs were found to own and control outdoor advertising spaces across a vast range of formats. They had influence over outdoor advertising spaces such as billboards, bus shelters, sponsorship on roundabouts, events related sponsorships and advertising on vehicles, amongst others (table 5). That said, LAs often owned a relatively small proportion of overall outdoor advertising spaces. For example, of the total billboards in Edinburgh, the LA owned six large hoardings (administered by JCDecaux) compared to over 300 hoardings owned by companies such as Global media, Ocean and Clear Channel. And whilst the LA owned and controlled a majority of the bus shelters in the area, Global Media controlled 3200 formats across major bus fleets, including First Edinburgh C & B and Lothian Region Transport (one of LA's Arm's Length External Organisations)[8–11]. This study found that in competitive advertising formats (e.g. urban billboards) or in advertising markets with insufficient demand (e.g. rural areas), public services may be disincentivised from restricting the content of their owned outdoor advertising spaces over concern

that a restriction could undermine the relative value of their outdoor advertising spaces or deprive them of economic viability.

Local Authority	Main advertising partner	Renewal term
The City of Edinburgh Council	JCDecaux	Ten years initially with possible extension of a further five years
Fife Council	Clear Channel	Seven years
West Lothian Council	Clear Channel	Renewal term varies with an initial term of 15 years and subsequent renewal on a few years' basis (latest renewal term is one year due to COVID-19 related delay in re-evaluating existing contract
Scottish Borders	Unknown by research respondents and advertising partnership is considered not to exist	

Table 4: Local authority advertising contract details

Local Authority	Outdoor advertising space type								
	Large hoardings	Bus shelters	Phone boxes	Adverts on Taxis	Adverts on public transport	Wayfinders	Events and sponsorship	Fleet advertising	Real Time Passenger Transport Information (RTPI)
The City of Edinburgh Council	Two (inbound and outbound) and four digital screens coming soon	29 digital 6-sheets	Unknown – not informed by research respondents	Licencing agreements	Controlled by ALEOs*	Currently being developed with proposed advertising provisions	Roundabouts, parks and green spaces, events: Oktoberfest, Christmas and Hogmanay, Edinburgh Festival	Unknown	Currently being developed with proposed advertising provisions
Fife Council	None owned by the LA	Six owned by LA, 153 owned by Clear Channel (six digital)	None owned by the LA	Licencing agreements where only signage pertaining to taxi business details is allowed. Private hire vehicles are not allowed any signage.	Not LA owned	Currently being developed without proposed advertising provisions	Roundabouts - mainly for local business sponsorship	Currently being developed	Unknown
West Lothian Council	Unknown	500 in total in West Lothian, 69 owned and	Unknown– not informed	Licencing agreements	Not LA owned	Unknown	Unknown	Unknown	Unknown

		controlled by Clear Channel (the rest have no advertising on them)	by research respondents				
Scottish Borders		Total number of outdoor advertising spaces (LA owned and otherwise) in Scottish Borders are perceived to be insignificant and primarily in operation as sign posting. The LA currently plans to expand advertising provisions to refuse vehicles and possibly bins however, these are primarily proposed to be used for signposting and local business promotion in the area. The LA is also currently developing a Real Time Passenger Information system in the area, however it is currently proposed to be without advertising provisions.					

*Table 5: Overview of outdoor advertising spaces across local authorities. *The relationship The City of Edinburgh Council has with ALEOs (Arm's Length External Organisations) differs in each instance and may need to be explored further[12].*

The majority of outdoor advertising spaces across all LAs were privately owned by third parties[8–10].

The value of third-party outdoor advertising spaces for a LA varied from area-to-area and across advertising formats. For example, there were licensed advertising markets (e.g. bus shelters, taxis, public transport etc.) where a LA may have influence through operational licensing agreements. That is to say, when the LA grants a license for a company/person to operate a service such as taxis or bus shelters, the LA may stipulate specific advertising principles in that licensing agreement. LAs do not typically generate income from these services as they are controlled and operated by third-parties however, an exception was noted during this study. In Fife, the LA's advertising partner, Clear Channel, was granted permission to erect and manage their own bus shelters in the area. In recent months, some of these bus shelters have been converted to digital formats. Respondents noted potential advertising-related revenue for the LA from said shelters through their licensing agreements, despite not owning them. However, the details of this licencing agreement were not explored in this study.

Furthermore, on occasion, a LA might value a third-party outdoor advertising space not because they derive any income from its existence (as they would if they owned the outdoor advertising space), but because the existence of an outdoor advertising space results in indirect benefits such as a reduction in the LA's expenditure. For example, in all areas, third-party owned bus shelters resulted in a reduced cost for the LA otherwise incurred to maintain such shelters. One respondent estimated the cost to erect each bus shelter to be approximately £5k however, the maintenance costs were not discussed and it is unclear whether this estimate would be consistent across LAs. The benefits a LA derives from a third-party outdoor advertising space may well limit their inclination to exert influence on advertising content, especially when there is a worry that an intervention might weaken the profitability – and therefore viability - of the outdoor advertising space (section 3.5.3).

The control or influence a LA has over a third-party outdoor advertising space also varies depending on the advertising format. However, overall control and influence was limited due to existing policies only relating to planning permissions and LA-owned outdoor advertising spaces. For example, LAs appeared to have little influence over third-party billboard hoardings and no influence over the content of the advert once an outdoor advertising space's planning permission is granted. Whereas, all respondents mentioned potential influence on the content of adverts on third-party owned outdoor advertising spaces when those outdoor advertising spaces form part of a licenced advertising market (for example, bus shelters, taxis, public transport etc).

Respondents reported two main mechanisms through which a LA might have influence over the content of a third-party outdoor advertising space. However, all respondents stated that a LA's ability to exert influence in either of these ways requires the goodwill and consent of a LA's advertising partners.

Firstly, a LA can influence the content of specific third-party owned outdoor advertising spaces through licencing agreements. For example, licencing agreements of third-party owned bus shelters in West Lothian have a long-standing agreement in which the LA stipulated advertising restrictions beyond the national guidelines at the time to prohibit political advertising and advertising of cigarettes and other tobacco products. This was prior to the national implementation of the Tobacco Advertising and Promotion Act 2002[13].

Secondly, a LA's influence on third-party outdoor advertising spaces was noted through their local advertising policies. Whilst local advertising policies clearly state that the principles would be limited to LA-owned outdoor advertising spaces without covering matters that are subjected to "separate regulation, for example through planning or licensing"[14], LAs may bind an advertising partner to this

policy through contract agreements. For example, respondents from Fife Council noted extending the principles of their local policy to third party outdoor advertising spaces through their contract with Clear Channel. They noted that the content of outdoor advertising spaces owned by Clear Channel would also need to adhere to the LA's advertising principles as stipulated in their contract. This research did not find this to be common practice amongst LAs. However, it is worth noting that these restrictions were reported to be limited to outdoor advertising spaces owned by the same advertising company that also managed LA-owned outdoor advertising spaces. This further implies influential power is achieved through goodwill and collaboration with existing advertising partners. Due to the novelty of this policy and limited exploration of licensing and contract agreements in this study, the specific nature of the content that affected this agreement is unknown. The underlying motive for this stipulation is also unknown, e.g. whether it was from a public health perspective, economic benefits, etc.

This report makes special mention of Arms Length External Organisations (ALEOs) because of the way in which they might have - perhaps inadvertently - converted public service-owned outdoor advertising spaces into 'third-party' outdoor advertising spaces outwith the simple control of LA policy. For example, on public transport, because of the use of Transport ALEOs, such as Lothian Buses, it is anticipated that LA policy may not easily influence the many adverts a resident sees when travelling on the city's public transport network[12]. This study did not explore the details of the LA's often complex and varied relationships with their ALEOs. However, respondents did convey a level of complexity in governance arrangements that they noted to make local interventions both less likely and less impactful.

Interestingly, respondents, despite often being advertising experts, were not always clear on the extent of their influence over licenced advertising markets and often considered the topic outside their expertise. Given the complexities and operational differences noted amongst LAs, e.g. licencing agreements being considered part of Legal services in some LAs, Transport and/or Property services in others, this study was unable to identify one person or department with total oversight of advertising policy. There did appear to be a triangulation of responsibility between departments for advertising policy decisions and this may limit the influence and likelihood of local policy interventions.

3.3 Current local advertising policies

In general, constraints on sponsorship and the content of local advertisements was said to be determined by national-level policies and guidance. However, this study did note examples where LAs maintained local policies designed to define additional principles for acceptable advertising and sponsorship practices.

A number of Scotland-wide regulations were noted as key shapers of outdoor advertising and sponsorship activity. These included:
- Local Government Act 1986;
- Local Government Scotland Act 2003;
- The Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984;
- Communications Act 2003;
- The Public Contracts (Scotland) Regulations 2015;
- General Data Protection Regulation (GDPR);
- Supply of Goods and Services Act 1982;
- Consumer Protection from Unfair Trading Regulations 2008;
- Business Protection from Misleading Marketing Regulations 2008; and,
- Civic Government (Scotland) Act 1982 – Section 127

Respondents also cited the existence of local policies designed to define local principles for advertising and sponsorship. For example, to protect amenity, the City of Edinburgh Council introduced a citywide ban on 'A' Boards and other temporary on-street advertising[15]. Health was not noted to be a primary motivation for this restriction. Moreover, some LAs have additional local policies such as Planning Guidance and Contract Standing Orders, outlining further local advertising and sponsorship principles[16–19]. The City of Edinburgh Council and Fife Council also both have local advertising policies drafted in 2019 and 2020 respectively[14,20].

Varied approaches were adopted for local policies based on vested economic interests, reputational considerations, as well as risk appetite assessments (section 3.4). Local advertising policies were occasionally, but not always, motivated by the need to protect the public's health. That said, the study was unable to find an example of a local policy that explicitly restricted advertising of HFSS foods. Instead, policies either relied on broad clauses that perhaps restrict the advertising of these foods or opt only to restrict the advertising of products such as tobacco and vaping.

When discussing decisions not to restrict advertising of HFSS foods within their advertising policies, respondents attributed their decisions to concerns around potential revenue loss and the perceived difficulty of defining HFSS foods. For example, in Edinburgh, the LA made a conscious decision not to restrict the advertising of HFSS foods following a consultation with their advertising partner, JCDecaux, due to concerns around potential revenue losses (see section 3.5.3). Whereas in Fife Council, respondents expressed apprehension around explicitly mentioning HFSS foods in their advertising policy but believed that their broader clause forbidding the advertising of 'socially undesirable or unhealthy acts' would prevent a whole spectrum of unhealthy advertising, including HFSS foods. Due to this relatively ambiguous policy writing, it is unclear whether this clause restricts any advertising beyond what is already addressed by The UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP code). The CAP code provides guidance on restricting advertisements that may promote an "unhealthy lifestyle in children", anti-social behaviour, and other unhealthy acts such as alcohol misuse and gambling behaviours that are "socially irresponsible or could lead to financial, social or emotional harm"[21]. It is unclear what impact, if any, this broader clause has had in practice because Fife's local advertising policy (2020) is only at the beginning of its implementation. Nor is it known whether the policy monitoring process will track the clause's impact on the local advertising of HFSS foods.

Furthermore, respondents cited numerous shortcomings of using local advertising policies to shape local advertising practices. For example, respondents from both Fife and Edinburgh noted that any local action would inevitably have a disproportionate impact on the outdoor advertising spaces owned by public services. Introducing such policies could then inadvertently give third-party owned outdoor advertising spaces a comparative advantage (section 3.5). In summary, many respondents understood the need for advertising restrictions to protect the health of residents, especially children. However, they were apprehensive about using local levers that disadvantage their own advertising estates through the creation of unlevel playing fields. Furthermore, they were unsure of the long-term sustainability of such local policies due to the resources required to monitor and enforce any local stipulation. Many preferred a national approach as it was said that a policy at that level would be simpler to enforce and could influence all outdoor advertising spaces equally.

3.4 Local decision-making processes for health-related advertising policies

3.4.1 Idea generation process for local advertising policies
Overall, there was a lack of consensus amongst LAs as to the likely origins of a policy designed to restrict the advertising of HFSS foods. When respondents were asked to speculate where they

believed new ideas for health-based local advertising policies would come from, their answers differed. However, common themes were identified in interviews. For example, Elected Members, local NHS Health Boards, and the Scottish Government were commonly cited as the places where ideas for restrictions would most likely originate. Other stakeholders were also mentioned, including Integration Joint Boards, Health and Social Care Partnerships, community planning partnerships, LA commissions and committees (e.g. Poverty Commission, Climate Commission, Policy and Coordination Committee and related directorates); third sector campaign groups, and Public Health Scotland. Notably, many respondents thought it unlikely that an individual LA department or executive would be the source of proposals for health-based advertising policies. However, in the limited instances where respondents did speculate on the involvement of LA services, it was proposed that such an idea may originate from LA Executives, from Property services or Protective Services.

Most respondents thought elected members to be the most likely source of local policy proposals. They were deemed crucial in both suggesting such an initiative and being involved in approving the design and policy principles. This was evidenced in The City of Edinburgh Council's advertising policy where the approach was initiated by elected councillors.

All respondents expected involvement of the Health and Social Care partnership in suggesting a new initiative. However, many respondents doubted whether their partnership would be *the* driving force because of a perception that their area's partnership primarily focused on social care and less so on health. Interestingly, Directors of Public Health were not mentioned at all as a potential source of health-protecting advertising policy however this research was unable to explore the reasons for this.

Generally, respondents noted the absence of staff within LAs dedicated to overseeing health initiatives. Therefore, it was thought that any initiative would need to originate from elected members, NHS, or the Scottish Government. Few respondents thought LA officers and executives would be the source of new proposals for health protecting advertising policy. On occasion, this belief was said to be because health was more the NHS' responsibility than the LA's:

> R10: "in Scotland, of course, public health isn't part of local authorities and obviously Scottish Government lead on health policy. So, it would more likely come from there. But obviously, we do have health and social care services, which are part of the council, but it tends to be more social work related, looking after older people or children, you know, vulnerable children".

On other occasions, respondents were more optimistic about the LA's increasing prioritisation of health. For example, many noted that the health integration agenda gave rise to new roles designed to encourage healthy behaviour, such as physical activity. However, respondents speculated that these employees would be unlikely to attempt the initiation of a health protecting advertising policy because their job descriptions were rarely focused at a strategic level and instead would be more likely to be oriented to the delivery of a specific project or service.

Interestingly, the long-term strategic prevention of ill-health was said to be an increasing concern for a LA's Planning Department. Planning teams were seen to be increasingly adept at incorporating health concerns into their development planning processes. However, as yet, health sensitive advertising policies were not reported as a focus of any planning department's discussions.

3.4.2 Design process of local advertising policies

Participants had varying opinions around the key actors crucial in designing a new health-protecting local advertising policy. It was generally agreed that the design process of such a policy would be determined by the underlying motives of the policy and the departments most likely affected by its implementation.

In terms of internal involvement from within the LA, a multi-stakeholder approach was perceived to be crucial. Whilst elected members and departments such as property services, planning, legal and communications were frequently mentioned, one respondent noted the importance of including every LA service affected in the discussions. There was a general consensus that the level of involvement would most likely be directly correlated to the departments most affected and most likely to implement such an initiative, e.g., planning, transport and property services. As outdoor advertising spaces in all LAs were noted to span across a number of departments, it was thought that individual departments might need further clarification about any related revenue streams. For example, billboards may be managed by property services, but if advertising is on display on LA vehicles such as refuse vehicles, then transport or roads management services would also need to be involved.

Respondents also said the input of external stakeholders would be crucial for any policy formulation. Again, interested stakeholders were often thought to include Community Planning Partnerships, IJBs, Health Boards, and Public Health Teams. It was also noted that public opinion may need to be considered, and a national consultation led by the Scottish Government was deemed to be most appropriate. Additionally, industry was said to be a crucial stakeholder with the input of relevant industry bodies, specifically advertising partners and food and drink industries. For example, as noted previously, in Edinburgh, the LA made a conscious decision not to restrict the advertising of HFSS foods following a consultation with their advertising partner, JCDecaux. Whilst this study was unable to gather the details of this consultation due to it being deemed commercially sensitive, this consultation, based on JCDecaux's experience in London, was suggested to have considerable influence over the LA's decision regarding the policy design (section 3.5.3).

Throughout the interviews, respondents discussed the importance of conducting risk-assessment analyses during the policy design process in order to consider potential risks involved and weighing them against the intended outcomes whilst also highlighting any gaps in their understanding for a successful policy process.

Respondents identified a range of factors that would be imperative to deliberate at each stage of the design process of any policy that looks to introduce local advertising principles. Before commencing the design of any local advertising policy, respondents noted the importance of considering how a LA's assets may best be used to generate additional income, the potential costs involved and the possible unfavourable impact on current revenue streams, if any. This was evidenced in the policy process for Fife Council's advertising policy where discussions surrounding income maximisation for the LA through expansion of outdoor advertising spaces preceded the design of their advertising policy (section 3.5.5). This was followed by risk-appetite related discussions and the prospects outdoor advertising spaces may offer.

Moving onto the policy design, respondents conveyed the importance of considering the LA's motives and desired outcomes. They noted the importance of considering risk-management strategies in the policy design process and a need to think beyond monetary gain alone. Respondents highlighted a benefit in concurrently approaching a restrictive advertising policy with an enabling policy for healthful advertising. Instead of solely focusing on exclusions and restrictions

for adverts, respondents discussed the importance of considering the nature of adverts that would be permitted and encouraged. It was thought that influencing existing advertising practices would also allow for opportunities to positively promote public health which would need to be considered for any relevant local policy design process. A collaborative approach with advertising partners and ALEOs was proposed to consider the aims of different stakeholders and the culture they would like to promote.

Respondents with first-hand experience of designing their area's health-conscious advertising policy noted a need to avoid any policy having unintended consequences. For example, in Fife, where an existing advertising policy has been proposed through an underlying motive to protect citizen health, it was noted that the risk management process was vital for such discussions. There was concern expressed that a poorly communicated policy could result in citizens assuming that any allowed advertising was endorsed and supported by LAs. In order to mitigate this, the policy clearly stipulated that the LA "would have no control over the ultimate service, product or claim being made"[14]. Further demonstrating this process to mitigate reputational risk, the LA formulated a risk-matrix for advertisements that may be utilised in order to deliberate the suitability of an advertisement (Appendix 4).

Overall, a large consideration for the policy design process was the importance of gathering and utlising suitable evidence to both design and substantiate the LA's approach. Expectedly, it was concluded that any policy proposed locally to restrict advertising activity beyond national guidelines would require an extensive evidence base. In discussing the suitability and requirement of the evidence base, respondents discussed wide-ranging questions that they believed would need to be answered for any proposed policy. These include:

- How does this approach align with the LA's objectives and local context?
  - Would this approach contradict or damage a commitment made in other areas within the LA?
- How effective is this approach?
  - Is there any evidence from other places of this being a successful intervention?
  - Is there any evidence of this approach being more effective when compared to other health protecting interventions, in particular for instances where there are limited resources?
- What are the potential benefits of implementing such a policy?
- What are the potential costs and resources involved? and,
- What are potential risks involved in this approach?

3.4.3 Implementation process of local advertising policies

Similar to the policy design process, it was concluded that the implementation process would be dependent on the underlying motive of the policy and the departments most likely to be affected by it. For example, if planning controls were to be applied as part of the policy, such as advertising restrictions based on distance from schools or hospitals, then Planning Services within a LA would be considered a crucial stakeholder in the implementation process. It was also agreed that legal services within a LA are considered to be critical in the implementation process across all LAs.

The theoretical and actual approaches to the implementation process varied and challenges were discussed. LAs with a large geographical area, e.g. Scottish Borders, noted challenges regarding

resources and close monitoring of a policy principle;

> R03: "it may be that a planning officer identifies that because [they] happen to be driving past. However, it's equally possible that we're reliant on someone identifying that within the local community and raising it with the local authority and then action would be taken at that juncture. So just as a practical notion, what I'm suggesting is that a very close monitoring of it would probably be a challenge".

A large part of the implementation process of such policies have been noted to be dependent on advertising partnerships. Whilst respondents noted having the power to veto advertisements that they deemed inappropriate based on content on their own assets, they also expressed a level of reliance and trust with their advertising partnerships for the implementation of the policy, which may be dealt with through the team that manages the relevant contract within the LA. Therefore, the implementation and management of any policy principles is largely deemed to be controlled by the relevant advertising partner. However, the LA reserves the right to raise concerns if they deem it necessary and some respondents noted having meetings with their advertising partners on a quarterly to annual basis where monitoring of these principles may be discussed. Strong relationships between LAs and advertising partners were instrumental in changes being made to specific advertisements.

The implementation process also entails communication of such policies internally and externally. There were particular challenges noted regarding communication of advertising policies. Whilst LAs noted communicating the advertising policy to Chief Executives within the LAs with the expectation that the same general principles would apply across the LA, there was little external communication noted. External communication was deemed crucial, as above. One of the considerations respondents deemed crucial for the design process of such a policy was evidence regarding benefits and lessons learned from the implementation of similar policies elsewhere. This was further evidenced by concerns raised regarding a lack of coordination amongst LAs leading to insufficient knowledge of the policy process. One respondent noted a greater need for coordination amongst LAs in order to share knowledge from such an approach and prevent the need to 'reinvent the wheel' each time to use their resources efficiently. However, it was noted that the 32 LAs in Scotland may have differing opinions dependent on their context which made this process more challenging. Respondents highlighted a need for and saw the benefits of a national approach which could be adapted to suit local contexts and allow for variation in local approaches to implementation.

The local advertising policy review process, for LA's that had such a policy, was confirmed to be on an annual basis. However, it was accepted that unless there were clear concerns highlighted with the current practice or changes were made on a national level, there would be little incentive to re-consider current policies. The length of contract agreements were noted to be granted on a 7-10year basis with the option of extension by another few years (table 4). As evidenced in West Lothian, this may lead to unaltered content-related stipulations in contracts for over two decades (table 4). Fife Council's policy was noted to require a more thorough review and monitoring of the policy in the first year due to its infancy. However, similar to other LAs and previous policies, this was noted to return to annual reviews following the first year.

3.5 Potential impact on LAs in instances of advertising legislation/policy changes
All respondents thought that the potential impact of any policy intervention could be wide-ranging and would have both positive and negative consequences. The anticipated benefits, opportunities, challenges and risks of any policy intervention are summarised below.

3.5.1 Benefits

Respondents discussed a range of potential benefits of implementing local advertising restrictions, in particular around HFSS foods. These included:

- Future cost benefits related to health and social care services as well as the potential consequent impact on employment levels;
- Helping to promote a healthier lifestyle and address health inequalities within different socio-economic groups; and,
- Potential benefits to the third sector in the region by supporting their work to improve health and well-being of citizens

All respondents identified health-related benefits, however, as noted previously, proposing such policies was rarely related to health and health was often considered to be a responsibility of the NHS. Therefore, this study was unable to conclude the relevance of these benefits.

3.5.2 Opportunities

Throughout the interviews, respondents noted numerous opportunities that could arise as a result of local advertising restrictions, in particular around HFSS foods. These included:

- Ability to increase promotion of healthier foods and brands;
  R02: "We've had someone who's doing vegan sort of products and suchlike. So, again, some of the businesses see an opportunity to do that and promote that then in terms of promoting positive health benefits"
- Establishing a cost-effective/efficient method of utilising current advertising spaces to sign-post citizens towards local businesses; and
- Allowing and encouraging innovative strategies to promote healthier lifestyles, provided this was national guidance, akin to the Soft Drinks Industry Levy. It was noted by respondents that the Levy led to the soft drinks industry innovating ways to reduce the sugar content of their products, and something similar could work for the HFSS food industry.

3.5.3 Risks

Risk management was a recurring theme in all interviews. The perceived impact of policy changes extended beyond the potential benefits and respondents discussed a range of possible risks associated.

Respondents noted direct and indirect revenue related risks. These included:

- Direct revenue losses from omitting adverts of HFSS foods. For example, in Edinburgh, the LA was advised that there could be a potential loss of 24% to their advertising revenue (through contract payments) if they implemented restrictions on advertising HFSS foods.
- Indirect revenue losses by potentially deterring industries interested in HFSS advertising (e.g. fast food chains) to open in the area hindering income, jobs and general development of the area. There were also concerns around making local businesses operating in that sector feel unwelcome, increasing reputational risk for the LAs.

Additional risks noted by respondents were related to potential instances where only local advertising restrictions would apply as opposed to a national initiative. It was also noted that implementing restrictions only on LA-owned/controlled outdoor advertising spaces (likely due to the influence discussed above) would have limited potential as advertising of HFSS foods on third-party outdoor advertising spaces would continue. Respondents also discussed potentially creating an unfair commercial disadvantage for themselves and an economic advantage for their competitors. If there were only restrictions on LA-owned/controlled outdoor advertising spaces, HFSS businesses would be forced to seek out privately owned sites. Competition for privately owned sites would increase leading to owners of such sites charging premiums to boost income. Simultaneously, the

LA's relationship with their advertising partners could become strained, potentially threatening future contracts.

This risk was also mentioned in relation to hindering advertising partner relationships that currently offer LAs cost-avoidance benefits as discussed previously, such as maintenance of bus shelters:

> R11: "[the contract] maybe doesn't lend itself well to being flexible (…) because if the council was to stop this contract, [the advertising company] would be able to take up these [bus] shelters and basically, we would have no stock there".

Similarly, in the absence of clear policy principles and direction for implementation, risk of litigation was noted. However, it was pointed out that this risk would be mitigated through clarity of restrictions, collaboration with advertising partners and a national direction for such a policy.

Notably, revenue risks mentioned relating to HFSS food advertising restrictions were derived from estimates based on restrictions applied across Transport for London (TfL) in 2019. This report was unable to gather the details for the proposed revenue loss which was also perceived to be commercially sensitive information. An independent review of the TfL restrictions is underway by the London School of Hygiene and Tropical Medicine, but has been delayed due to Covid-19. This review may provide further insight into the impacts of the ban on revenue.

3.5.4   Challenges

In addition to the challenges discussed previously regarding implementation and communication of local advertising polices (3.4.3), respondents discussed other challenges relating to local policies designed to reduce the advertising of HFSS foods. HFSS food-related restrictions were noted to be subjective and open to interpretation. Respondents conveyed this to be a challenge in ensuring clarity around related advertising restrictions in order to reduce the associated risk. No mention of using valid and reliable nutrient profile models were made in this study and classification of HFSS foods were deemed inconclusive by respondents. However, it is worth noting that the study respondents often used the terms 'HFSS foods' and 'unhealthy foods' interchangeably. Other challenges discussed included:
- Concerns about costs involved to get the assets prepped for expansion (primarily relevant for LAs with fewer outdoor advertising spaces as it stands today) as well as costs involved in the implementation and monitoring process. This included the concerns relating to resource management and the potential requirement to upskill staff members in order to allow the implementation of this initiative to be absorbed into people's current roles;
- Challenges involved due to the impact of COVID-19 pandemic. Respondents anticipated advertising policy changes to potentially place an additional burden on businesses as they try to recover from the impact of the pandemic. However, it was also noted that this may be mitigated through clear communication of the policy and the possible opportunities it could offer:
  - P02: "One of the negative things could be it's just yet another thing that businesses are having to deal with, as well as all these other changes.";
- Apprehension relating to a lack of evidence respondents perceived they had regarding the effectiveness of health-protecting advertising policies. This was further evidenced by the acknowledgment of a lack of communication of existing relating policies amongst LAs leading to a deficient evidence base.

3.6 Drive and motivation for local advertising policy interventions

Three main considerations were given for why a LA might introduce a local advertising policy: the potential impact on local citizens' health, the impact on local economy and the ultimate impact upon LA services.

3.6.1 Citizen's health

There was a general consensus a LA would be more inclined to introduce a policy were it proven to improve health.

LAs where Community Planning Partnerships had made health a headline objective in their outcome improvement plans appeared more ready to intervene on health grounds under a precautionary principle (e.g. Fife Council)[22].

Whereas in areas where this consideration was less apparent, the case for action had not yet been made. For example, many respondents cited the need to consider the balance and strength of evidence of HFSS food advertising's impact on health. They also suggested interventions in other areas instead could yield greater health benefits, e.g. promoting physical activity. Similarly, others noted the high exposure of HFSS food advertising online and TV as a reason for them not to address outdoor advertising.

3.6.2 Local economy

Respondents discussed that underlying motivations for implementing local advertising policies are and would be rooted in improving the local economy and maximising revenue opportunities (section 3.6.3). As discussed previously, all LAs were looking to expand their advertising assets which theoretically would cause some LAs to exponentially increase levels of advertising in the area. This expansion may also increase the LA's exposure to risk due to increased opportunities for commercial sectors to influence its citizens. Due to this, there has been increased internal motivation to consider local advertising practices to align with the LA's objectives.

Some LAs were looking to expand their outdoor advertising spaces in order to support local businesses and aid economic recovery post COVID-19 whilst also supporting healthy behaviour. Due to these underlying motivations, respondents noted increased consideration of content of advertisements in the area. In these instances, the inclination to consider local advertising policies primarily stemmed from potential impact on local economy. The Scottish Borders, noted a lack of large advertising campaigns in the area, in particular of HFSS foods. Instead, the majority of advertising in the area was perceived to be informative and signposting to local businesses (table 5). These differences in context also led to variations in underlying motivation to implement local advertising policies and regulations.

There was also reportedly a variance in LA income generated by their individual advertising estates. Areas with smaller estates and less revenue appear less concerned by potential risks when considering policy interventions. For example, respondents from the Scottish Borders, a comparatively rural area, thought their LA seemed relatively more open to intervening in a way that prohibited large scale advertising campaigns for HFSS food on their outdoor advertising spaces. Again, this may also be influenced by the fact that their outdoor advertising spaces were thought to be predominantly used for information campaigns and signposting to local businesses (table 5). Whereas, areas with larger estates and more significant income generated by advertising appeared more cautious about exercising their control and influence, citing a greater risk to income and a greater number of vested stakeholders.

3.6.3 Impact on LA services

Lastly, throughout the study, respondents discussed the potential impact on LA services and the challenges involved in that process. Expectedly, the risks of potential loss of revenue, costs and resources involved in implementing a health-protecting policy played a substantial role in determining the respondents' inclination to consider such policies. For example, in Fife, this initiative was noted to be born out of a collaboration of multiple departments and viewpoints. Respondents discussed further details from a financial standpoint. A case was highlighted where Directors of Finance across Scotland and the group COSLA commissioned the accounting firm PWC to conduct an analysis a few years ago across 23 LAs which highlighted potential for income generation for LAs through advertising and sponsorship. Following this, internal discussions within the LA regarding the expansion of outdoor advertising spaces also prompted conversations around financial risk appetite as well as brand endorsement perspectives from the communications team. It was decided that a collaborative approach would be appropriate for such an initiative in order to support local economy using LA assets whilst also supporting a healthy behaviour shift.

Additionally, respondents from Fife Council discussed a supplementary motivation to implement a health-protecting policy. It was noted that one of the underpinning drives to consider such a policy was to help create a platform which could potentially be replicated by other LAs should they choose to do so. Respondents hoped such a policy would support discussions with the Scottish Government to consider a larger, nation-wide, initiative. It was widely noted amongst all LAs that a national drive would be key in promoting local inclination to implement such policies due to the expected national direction and a clear mandate.

This study found that a competitive advertising environment, under which public services feel compelled to maintain the relative value of their outdoor advertising spaces, can often dissuade LAs from controlling content of their owned outdoor advertising spaces. A nation-wide or UK-wide measure, similar to the Soft Drinks Industry Levy, with the support of the ASA was perceived to be more compelling to help mitigate some concerns noted previously whilst also having a greater impact on health behaviour. Respondents noted that a national drive could help mitigate concerns around revenue risks associated with market competition from third-party assets whilst also preventing inconsistent health messages in the area. Respondents representing more rural LAs, e.g Scottish Borders, also highlighted further contextual considerations. It was noted that citizens were also influenced by advertising in adjacent areas as, prior to COVID-19 pandemic restrictions, they frequently travelled to other LAs for work, leisure or to visit family and friends. Therefore, a national drive was expected to be more effective and contextually relevant.

4.0 Strengths and Limitations

This research benefited from using semi-structured interviews which allowed for an in-depth exploration of the subject matter. It also benefited from strong partnerships with the East Region and gatekeepers helped ensure a diverse range of people were interviewed. Furthermore, the mixed-methods approach allowed for initial contextual insight into the outdoor advertising landscape, primarily allowing researchers to gain information around the ownership and control of different advertising spaces.

Due to the wide-ranging subject matter and time constraints, this study could not comprehensively explore the whole outdoor advertising environment in the East Region of Scotland. It also did not examine the full extent of LA influence on outdoor advertising spaces through licencing agreements as the study respondents did not consider this to be part of their expertise. Further research could determine LA influence on advertising estates through licensing agreements. Interviews with relevant divisions, e.g. legal services, transport services and property services, may prove insightful.

Whilst this research has revealed some key considerations for potential local health-protecting advertising policies and the role of LAs in implementing these, future research may be required. For example, elected members were highlighted as the key stakeholders likely to propose new local policies. Therefore, understanding their views of health-protecting advertising policies may prove beneficial.

5.0 Conclusion

This study has provided good insight into the outdoor advertising environment in the east region of Scotland and the management and administration of advertisements by LAs.

The research demonstrates the variability in advertising estates and influence amongst LAs. An expected association was noted between population density and increased commercial interest and breadth of outdoor advertising spaces in the area. Whilst some LAs owned and controlled more outdoor advertising spaces than others, all LAs are thought to own a small percentage of the total number of outdoor advertising spaces. This study concludes that undisputable influence on the content of advertising depends on ownership of the outdoor advertising spaces therefore, all LAs noted limited control overall. The limited influence suggested over third-party outdoor advertising spaces has been noted to rely on licensing agreements.

A number of national regulations were discussed to shape outdoor advertising activity ranging from planning regulations to data protection. Some LAs also had additional local guidance and regulations relating to outdoor advertising that were primarily amenity and public safety related. Two of the four LAs included in this study had local advertising policies that also explored principles relating to the content of advertisements. Whilst both policies outlined restrictions relating to unhealthy products and acts such as tobacco and gambling, neither policy explicitly prohibited the advertising of HFSS foods beyond regulations in place through the ASA. Whilst challenges were noted in communicating the policy internally and externally, respondents noted the general expectation that advertising policy principles (e.g. LA's stance on vaping) would apply across the LA, potentially affecting other areas such as sponsorship agreements.

Similarly, there was a lack of consensus noted when discussing the actual and theoretical policy process to introduce advertising policies relating to content. However, some commonality has been noted amongst LAs. All respondents conveyed the importance of elected members in both suggesting such a policy initiative and being crucial players in the design and implementation process. NHS Health Boards and the Scottish Government were also seen to be key sources of such policy proposals. Internally, a multi-stakeholder approach was thought to be necessary. Generally, respondents noted the importance of income maximisation and improvement of the local economy as underlying motivations for designing and implementing local advertising policies. This was also suggested to be a key influence for related risk assessments (appendix 3).

Throughout the study, respondents conveyed the importance of establishing and maintaining advertising partnerships. Advertising partners were seen as key stakeholders with strong influence. LAs discussed reliance on these partnerships for the implementation and day-to-day monitoring of advertising activity, for their expertise regarding related revenue, and for providing some cost-avoidance benefits to the LAs.

Research respondents placed importance on conducting risk-assessment analyses looking at potential revenue changes, resource management, highlighting information gaps and weighing possible outcomes against the evidence base for such an approach. A number of concerns were raised regarding the evidence base for introducing a health-protecting policy, with questions raised around effectiveness and the evidence surrounding its potential impact. Benefits and opportunities

of such a policy primarily consisted of health protection of citizens and improving the local economy. Conversely, the risks and challenges the respondents foresee from local advertising policies ranged from potential revenue losses, reputational risks for the LAs and challenges associated with resource management and additional burden for local businesses.

Respondents noted greater interest for a nation-wide restriction, similar to the Soft Drinks Industry Levy, with the support of ASA. It is thought that this approach may help create a level playing field between LA-owned and privately owned outdoor advertising spaces. A national approach could also protect LA relationships with advertising partners, protect against local reputational risks and avoid the risk of inconsistent messaging to the public. Furthermore, it has been suggested that having national guidance on the subject would ensure clarity and consistency of the term HFSS foods whilst also mitigating concerns for LAs over resources required to gather evidence for this approach. Evidence regarding benefits and lessons learned from implementation of relevant policies in other areas was deemed crucial for the design process and a national approach would ensure greater coordination between all 32 LAs in Scotland and allow for more efficient use of resources.

Scotland's Diet & Healthy Weight Delivery Plan discusses the impact of the food environment on citizens' food behaviour. The plan also outlines the need to engage LAs to develop a code of practice to restrict HFSS food advertising on LA-managed sites[4].

Overall, respondents acknowledged the potential health impacts of local advertising policies that restrict HFSS food advertising. However, there seemed to be little incentive to implement explicit local restrictions due to a potential undesirable economic impact, a perceived lack of evidence on the potential health benefits, and the inconsistency noted in recognising the place for public health in LA policy developments.

6. 0 Recommendations
LAs may benefit from an increased understanding of the role advertising plays in food purchasing behaviour or other health-related impacts. A more thorough understanding of this evidence may help inform local policy and practice. In addition, more research could be undertaken on the health impacts of other forms of advertising that residents are exposed to in the East of Scotland, such as TV advertisements. Finally, a consultation on the potential for national health-protecting outdoor advertising policies may prove beneficial to allow for consistent approaches across LAs.

Recommended Resources

o A Healthier Future – Scotland's Diet & Healthy Weight Delivery Plan (2018) (The Scottish Government)
o The Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984;
o Healthier Food and Drink Advertising Policy Toolkit: how local areas can implement policies to restrict junk food advertising (SUSTAIN) - *publication expected in 2021.*
o Evaluation of TfL restriction on HFSS foods advertising (London School of Hygiene & Tropical Medicine): expected Spring 2021

Statement of Conflict of interest

This research was funded by The Scottish Government. Obesity Action Scotland has an interest in influencing policies related to advertising of HFSS foods. The organisation's work is overseen by a Steering group consisting of members from a variety of sectors to help mitigate potential bias and ensure rigour and transparency throughout the research process. This research project had an oversight group who were involved in all stages of decision making.

References

1.   Bernhardt F. Healthier Food and Drink Advertising Policy Toolkit : how local areas can implement policies to restrict junk food advertising. 2021.
2.   SUSTAIN. Bristol becomes first city outside London to restrict junk food advertising [Internet]. SUSTAIN. 2021 [cited 2021 Mar 10]. Available from: https://www.sustainweb.org/news/mar21-bristol-launch-healthier-food-advertising-policy/
3.   Reynolds B, Holt A, Bernhardt F, Crowther B, Bradshaw B. Taking down junk food ads [Internet]. 2019 [cited 2021 Mar 8]. Available from: https://www.sustainweb.org/publications/taking_down_junk_food_ads/
4.   The Scottish Government. A Healthier Future – Scotland's Diet & Healthy Weight Delivery Plan [Internet]. 2018 [cited 2021 Jan 15]. Available from: https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2018/07/healthier-future-scotlands-diet-healthy-weight-delivery-plan/documents/00537708-pdf/00537708-pdf/govscot%3Adocument/00537708.pdf?forceDownload=true
5.   Olsen JR, Patterson C, Caryl FM, Robertson T, Mooney SJ, Rundle AG, et al. Exposure to unhealthy product advertising: Spatial proximity analysis to schools and socio-economic inequalities in daily exposure measured using Scottish Children's individual-level GPS data. Health Place [Internet]. 2021 Mar 1 [cited 2021 Mar 8];68(e102535). Available from: https://linkinghub.elsevier.com/retrieve/pii/S1353829221000319
6.   Neve K, Hawkes C, Brock J, Spires M, Isaacs A, Squires CG, et al. Understanding Lived Experience of Food Environments to Inform Policy: An Overview of Research Methods [Internet]. 2021 [cited 2021 Mar 8]. Available from: https://researchcentres.city.ac.uk/__data/assets/pdf_file/0004/595318/Understanding-Lived-Experience-FINAL-v2.pdf
7.   UCL. Accepted Ethical Standards [Internet]. UCL RESEARCH ETHICS COMMITTEE. 2016 [cited 2021 Mar 12]. Available from: https://ethics.grad.ucl.ac.uk/accepted-ethical-standards.php
8.   JCDecaux. Edinburgh - JCDecaux UK [Internet]. JCDecaux. 2021 [cited 2021 Mar 4]. Available from: https://www.jcdecaux.co.uk/edinburgh-0#roadside
9.   Clear Channel. Billboard & Bus Shelter Advertising Edinburgh - Outdoor Advertising - Clear Channel Direct [Internet]. Clear Channel. 2021 [cited 2021 Mar 4]. Available from: https://www.clearchanneldirect.co.uk/locations/scotland/edinburgh
10.   Global Media. Edinburgh Outdoor Advertising - Global [Internet]. Global Media. 2021. Available from: https://global.com/advertise/audiences/local-advertising/scotland/edinburgh/outdoor/

11. The City of Edinburgh Council. Reform of Transport Arm's Length External Organisations [Internet]. 2020 [cited 2021 Mar 9]. Available from: https://democracy.edinburgh.gov.uk/documents/s26620/7.7 - Reform of Transport Arms Length External Organisations.pdf

12. The City of Edinburgh Council. Policy and Sustainability Committee - Tuesday, 6th August 2019 at 10:00am - City of Edinburgh Council Webcasts [Internet]. The City of Edinburgh Council Webite. The City of Edinburgh Council; 2019 [cited 2021 Mar 4]. p. 1:31:38-1:34:56. Available from: https://edinburgh.public-i.tv/core/portal/webcast_interactive/437765/start_time/5499000

13. GOVUK. Tobacco Advertising and Promotion Act 2002 [Internet]. UK Legislation. Statute Law Database; 2002 [cited 2021 Mar 1]. Available from: https://www.legislation.gov.uk/ukpga/2002/36/contents

14. Fife Council. Advertising and Sponsorship Policy and Procedure 2020. 2020.

15. The City of Edinburgh Council. On-street advertising structures – The City of Edinburgh Council [Internet]. The City of Edinburgh Council. 2018 [cited 2021 Mar 4]. Available from: https://www.edinburgh.gov.uk/support-business/-street-advertising-structures?documentId=12495&categoryId=20026

16. The City of Edinburgh Council. The City of Edinburgh Council Contract Standing Orders [Internet]. 2021 [cited 2021 Mar 4]. Available from: https://www.edinburgh.gov.uk/downloads/file/28816/contract-standing-orders

17. The City of Edinburgh Council. APPLICATION FOR CONSENT for City Dressing Banners APPLICATION DETAILS [Internet]. 2019 [cited 2021 Mar 4]. Available from: https://cultureedinburgh.com/sites/default/files/attachments/council-approved-banner-

18. The City of Edinburgh Council. EDINBURGH PLANNING GUIDANCE: OUTDOOR ADVERTISING AND SPONSORSHIP [Internet]. 2019 [cited 2021 Mar 4]. Available from: https://www.edinburgh.gov.uk/downloads/file/26474/outdoor-advertising-and-sponsorship

19. Fife Council. Planning Guidance - Fife Council [Internet]. Fife Council. 2021 [cited 2021 Mar 4]. Available from: https://www.fife.gov.uk/kb/docs/articles/planning-and-building2/planning/development-plan-and-planning-guidance/planning-guidance

20. The City of Edinburgh Council. Policy on advertising and sponsorship [Internet]. 2019 [cited 2021 Mar 4]. Available from: https://democracy.edinburgh.gov.uk/documents/s4036/Item 7.7 - Policy on Advertising and Sponsorship.pdf

21. The Committee of Advertising Practice. The CAP Code The UK Code of Non-broadcast Advertising and Direct & Promotional Marketing Edition 12 The UK Code of Non-broadcast Advertising and Direct & Promotional Marketing 2 [Internet]. 2014 [cited 2021 Mar 24]. Available from: https://www.asa.org.uk/uploads/assets/47eb51e7-028d-4509-ab3c0f4822c9a3c4/b721618e-3c2c-438d-8024411970aa2c75/The-Cap-code.pdf

22. Fife Council. Plan 4 Fife: Local Outcome Improvement Plan Contents [Internet]. 2017 [cited 2021 Mar 9]. Available from: https://publications.fifedirect.org.uk/c64_Plan_for_Fife_2017_2027_June192.pdf

1) Briefly describe the sort of outdoor advertising spaces you believe [LA name] could theoretically influence should you choose to? (e.g. power as a landlord)
   a. Which would you say is greater, the area you can influence or control?
2) 2) Does [LA name] currently have policies designed to define appropriate locations for outdoor advertising spaces?
   a. Would you be able to please briefly summarise the key aims of these policies?
   b. Do you know if [LA name] currently have any local advertising policies designed to protect the health or wellbeing of residents? That's to say, policies designed to limit the presence of hazardous products (For example, gambling, payday loans, tobacco, alcohol, unhealthy food, inappropriate body image). If so, please expand.
3) Who in [LA name], do you believe is most likely to suggest introducing a local advertising policy, in particular in relation to addressing advertising of unhealthy foods?
   a. Whose participation in [area name] would be critical for a successful design of such a policy intervention and why?
   b. Who do you believe would inform the policy design?
   c. Who in [LA name] would be critical for the successful implementation and enforcement of such a policy?
4) In your opinion, how likely is it that the LA would consider implementing advertising policies designed to reduce exposure to hazardous products (including unhealthy food)?
   a. What kind of factors do you think might be needed to increase the likelihood of action?
      i. *(if necessary) Would the LA be more likely to consider such interventions designed to protect a vulnerable group? (for example, children)*
   b. Do you believe there may be anything specific about [area name] that might make an intervention more or less likely?
   c. Do you think any extra evidence about the hazards of unhealthy food advertising would encourage a policy intervention? (Y/N). If so, please expand.
5) Let's assume an intervention designed to limit the advertising of unhealthy food has been implemented and enforced. Could you speculate;
   d. What might be some of the benefits be?
   e. What do you think might some of the drawbacks be?
   f. Could you share a little about some logistical considerations perhaps?
6) Finally, I would like to just take a minute to establish [LA name]'s working definitions of outdoor advertising. Could we please take a minute to clarify what adverts would be considered to be a part of outdoor advertising in [LA name]? (remember we are interested in how the Public Sector could potentially influence the overall outdoor advertising spaces, e.g. through leasing, licencing agreements etc.

Appendix 2: Informed consent checklist for research participation

Local authority name: Click or tap here to enter text.
Interview participant name: Click or tap here to enter text.

☐ Written invitation (with research aim and plan) sent to local authority Director(s) to participate in research

☐ Approval received from Director(s) of local authority to conduct study

☐ Written interview invitation sent to interviewee outlining aim of the research

☐ Participant agreed to participate in research interview

☐ Online interview invitation accepted by participant

☐ Outline of research aim, plan and confidentiality provided at the start of online interview to participant

Appendix 3: Study audit trail

Research team and reflexivity
Three researchers were involved in this study alongside a research advisory group consisting of four additional members from different organisations. Researchers were employed by Obesity Action Scotland and East of Scotland Partnership. The advisory board consisted of members from The Scottish Government, Obesity Action Scotland and East of Scotland Partnership. The advisory board met virtually and discussed the governance of the study once or twice a month. The research was also overseen by the East Region Children and Young People Board.

The project was funded by the Scottish Government. Obesity Action Scotland also has an interest in influencing policies related to advertising of HFSS foods. The organisation's work, including this project, is also overseen by a Steering group consisting of members from a variety of sectors in order to help mitigate potential bias and ensure transparency throughout.

Data collection
Using gatekeepers known, researchers gathered contact information for local authority directors in order to seek approval for the study. These directors then provided a list of potential participants for the study from each of their LAs. A total of 16 participants were identified and contacted. The researchers gained approval from 11 participants who were interviewed for this study resulting in a total of 8 interviews.
Data was collected virtually using Microsoft Teams and all other communication with participants was conducted over email.

Data reduction and analysis products
After each interview with participants, the researcher conducting the interviews noted initial reflections, brief summary from the interview and any initial questions the researcher had that may need to be followed up with. The researcher used these voice recordings prior to starting the analysis process in order to establish a codebook for the data. An initial codebook was developed using existing literature on the subject as well as said recordings.
The researcher then transcribed all interviews and ensured each transcription also included the informed consent checklist completed by the research prior to commencing the interview.

Initial codebook for thematic analysis:
1) Council's perceived influence on advertising practices
    a. Properties owned
    b. Third party outdoor advertising spaces
    c. Local policies
2) Perceived impact of advertising restrictions of HFSS foods
    a. Benefits and opportunities
    b. Risks and challenges
3) Local governance and implementation process of such policies
    a. Idea generation
    b. Design
    c. Implementation
    d. Monitoring and evaluation
    e. Inclination to implement local advertising restrictions for HFSS foods

Data reconstruction and synthesis products

Using the initial codebook, all transcriptions were coded using NVIVO 11. Codes were however not limited to the codebook and instead used the codebook as a guidance for data clean up. Any new themes identified were used to improve the codebook for this research (table 6).

Following data clean up and the thematic framework generation by the primary researcher, a secondary researcher took a small sample of the transcriptions (2/8 interview transcripts) to code the data independently. This allowed for greater objectivity and consistency of analysis. No new themes were found following the secondary analysis.

The themes concluded in this study are as follows:

Main themes	Sub-themes
Influence	Differences across local authorities
	Local authority owned outdoor advertising spaces
	Third-party outdoor advertising spaces
	Local policies
Process	Idea generation
	Design
	Implementation
Impact	Benefits
	Opportunities
	Risks
	Challenges
	Drive and inclination for local policy

Table 6: Research themes

A full report was written by the primary researcher and supervised by the secondary researcher before further it was further assessed by the advisory group. The advisory group offered direction for the report whilst also requiring clarification for the analysis to ensure transparency and clarity for the reader. This relatively objective outlook helped mitigate researcher bias to ensure trustworthiness and credibility for the project. The report was then validated by research participants ensuring accuracy before publication planning.

Process monitoring
The primary researcher developed methodological notes throughout, e.g. proposed design of interview questions, informed consent procedure, thematic codebook etc. These notes were utilised to direct discussion during advisory board meetings where all members conveyed their thoughts and feedback. Prior to commencing the report write up, the primary researcher presented initial findings to the group to ensure transparency and call attention to any instances where conclusions were deemed subjective or required further evidence. This also resulted in highlighting the limitations of this report and recommendations for further research.

Materials and contextual components
Informed consent forms, participation invitation letters and project approval letters were all designed prior to data collection.
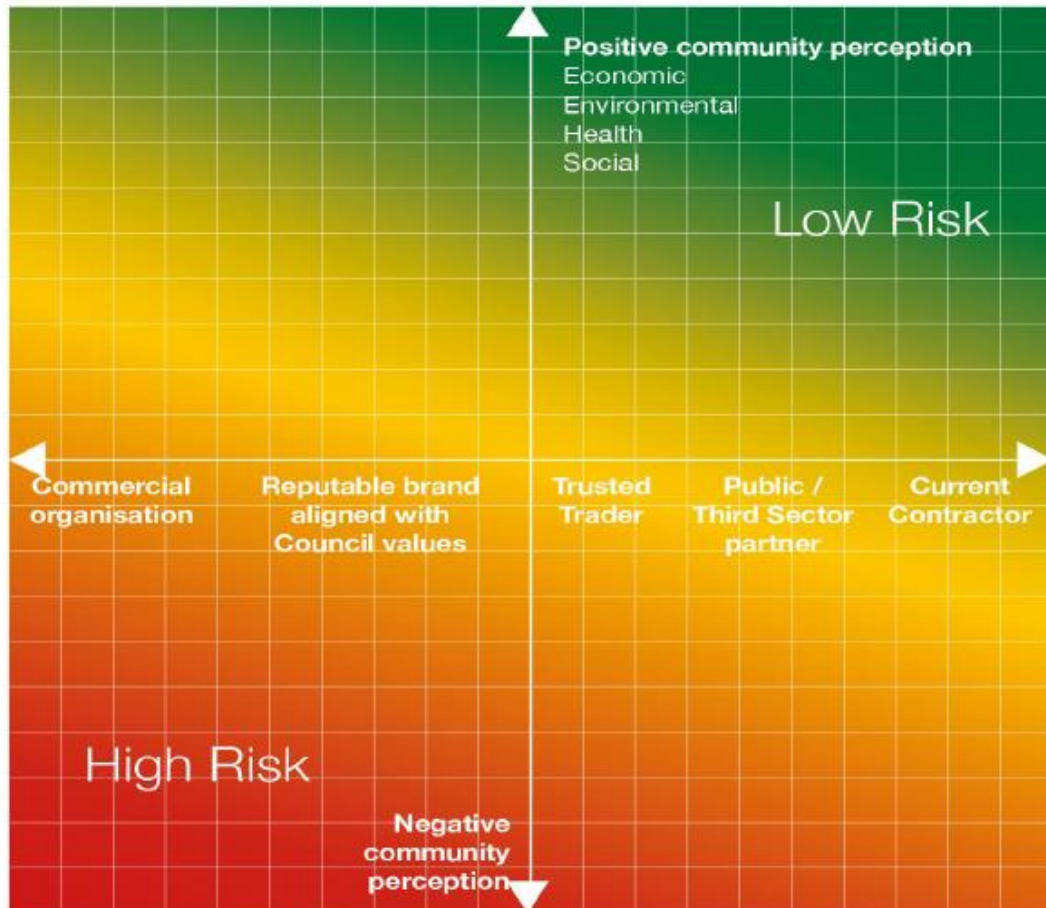The virtual method of data collection resulted in requiring limited equipment. A password protected laptop was used to conduct the interviews, attend advisory board meetings and write all reflexive notes as well as the report.

Appendix 4: Fife Council's Risk Assessment Matrix

Used to limit risk as part of their Advertising and Sponsorship Policy and Procedure 2020 [14]

Reputational Association Risk

Consideration of organisational/brand values and operation as well as community perception

:.