

**POLICY ON ADVERTISING ON PUBLIC TRANSPORT SERVICES**  
**Blackpool Transport Service Limited**

**1. Introduction**

- 1.1. This Advertising Policy sets out the policy of **Blackpool Transport Service Limited (BTSL)** on the display of advertisements. It applies to advertising on buses and trams run by BTSL and property owned, occupied or managed by BTSL, whether that is real (buildings etc) or moveable property (“BTSL’s property”).
- 1.2. “Advertising” includes the display of advertising materials, the distribution of printed publications, or by performance (“advertisements”).
- 1.3. BTSL is committed to treating all members of the public equally and with respect. BTSL wishes to ensure that everyone is able to use its services and facilities without undue offence being caused to them.
- 1.4. BTSL is also fully committed to meeting its obligations under the Equality Act 2010.
- 1.5. For these reasons, BTSL has adopted this Policy. It reflects the policy of Blackpool Borough Council (“BBC”) on advertising on its property. It gives effect to BBC’s requirement that all advertising on its property, including property occupied or managed by a company wholly owned by BBC, must meet the standards set out below.
- 1.6. This Policy aims to ensure that undue offence is not caused to members of the public by controversial advertisements on, or in, BTSL’s property, including that occupied or managed by BTSL, and to ensure that BTSL meets its legal obligations.

1.7. BBC and BTSL also want to make sure that the risk of vandalism to its property that might arise if they allowed controversial advertisements to be displayed is avoided.

1.8. From time to time, BTSL engages external private contractors to manage advertising on BTSL's property. This may be through the grant of a licence to exploit any commercial advertising opportunities or by entering into other contractual arrangements. All such licences or contracts with any such private contractors will contain terms ensuring that any advertising complies with this Policy, including that the required standards set out below are met in respect of any such advertising.

## **2. Required Standards**

2.1. Advertisements will not be approved for display on BTSL's property if in the reasonable opinion of BTSL, the advertisement falls within any of the following categories:

2.1.1. The advertisement is inconsistent with any of the obligations imposed by the Equality Act 2010.

2.1.2. The advertisement is likely to cause widespread or serious offence to members of the public:

2.1.2.1. by reason of the nature of any product, service, event, individual or group being advertised; or

2.1.2.2. by reason of the wording or design of the advertisement or the imagery used; or

2.1.2.3. by reason of the message conveyed or sought to be conveyed by the advertisement, including by way of inference.

2.1.3. The advertisement condones or provokes anti-social behaviour.

2.1.4. The advertisement promotes the sale or consumption of tobacco products.

- 2.1.5. The advertisement promotes the provision of “No Win No Fee” services.
- 2.1.6. The advertisement promotes political or religious views, causes or events, or individuals espousing political or religious views.
- 2.2. BTSL will not approve for display any advertisement that does not meet these standards and will remove, or cause to be removed, any such advertising from its property if, notwithstanding this Policy, it is displayed.
- 2.3. Any contractor engaged to manage advertising for BTSL must not allow any advertisement to be displayed on BTSL’s property that does not meet these standards and they must remove any such advertising from its property if, notwithstanding this Policy, it is displayed. Any such contractor must remove any advertising that BTSL decides does not meet the standards set out in this Policy if required to do so by BTSL.
- 2.4. BTSL understands that some advertising falling within some of the categories listed above will not be offensive and could not be reasonably viewed as offensive to anyone. However, BTSL aims to adopt a position of neutrality and to reduce the likelihood that BTSL or one of its companies will have to arbitrate between groups or individuals over what is, or is not, acceptable. For this reason, it is BTSL’s policy not to allow any advertising in the categories set out above.
- 2.5. Further, advertisements on BTSL’s property must meet the standards required by any applicable statutory and legal provisions and any applicable regulations in force relating to the content of advertisements or promotional messages, including The UK Code of Non-Broadcast Advertising, Sales Promotion, and Direct marketing (12<sup>th</sup> edition).

### **3. Complaints**

- 3.1. If a member of the public, or a body displaying or seeking to display an advertisement, has a complaint, question or concern about this Policy or its application, including about any particular advertisement then they should

first raise this with: [customerexperience@blackpooltransport.com](mailto:customerexperience@blackpooltransport.com) for the attention of Karen Cooper, Head of People and Stakeholders

3.1.1.; They will do their best to resolve any issue.

3.2. If any complaint is not satisfactorily resolved, or it is believed that any question or concern has not been adequately addressed, after having followed the procedure under paragraph 3.1, that complaint, question or concern may be raised with [accounts@blackpooltransport.com](mailto:accounts@blackpooltransport.com) for the attention of James Carney, Finance and Commercial Department at the BTSL. They will make a decision on any complaint or respond to any question or concern, as the case requires. Any decision of James Carney, Finance and Commercial Department at the BTSL as to whether an advertisement should be displayed or removed will be final.

A handwritten signature in black ink that reads "J. Carney." The signature is written in a cursive style with a large initial "J" and a long horizontal stroke at the end.

Dated 11 March 2021,

Signed by James Carney,

Finance and Commercial Director, Blackpool Transport Services Ltd