

Brighton & Hove City Council

Cabinet

Agenda Item 57

Subject: Advertising and Sponsorship

Date of meeting: Thursday, 15 October 2026

Report of: Cabinet Member for Customer Services, Public Realm & Local Government

Lead Officer: Director for People and Innovation

Contact Officer: Natalie Orringe, Head of Strategic Communications and Engagement

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Ward(s) affected: (All Wards);

Key Decision: Yes

Reason(s) Key: Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

- 1.1 This report introduces the Council's Advertising and Sponsorship Policy, designed to provide a clear, consistent and transparent council-wide framework for managing all advertising, sponsorship and promotional activities, including brand activation on council-owned and managed assets. The policy seeks to ensure compliance with legal and regulatory requirements, whilst promoting council values and protecting the Council's reputation by preventing conflicts of interest or perceptions of undue influence. It will also help to unlock sustainable income streams at scale, contributing directly to the Council's Medium Term Financial Strategy, as well as delivering public realm benefits, and promoting Brighton & Hove as a vibrant place to live, work and visit.
- 1.2 Implementation of this policy will enable confident and diligent decision making about the commercial partnerships, advertising and sponsorship arrangements the Council enters into, ensuring these align with the council's aim to build a better Brighton & Hove for all through:
- Enhancing the city's public realm, reputation, cultural life, and visitor offer,
 - Promoting fairness, inclusion, accessibility and community benefit,
 - Protecting and improving public health, wellbeing and safety, and
 - Supporting the financial sustainability of the council, good governance, service improvement.

- 1.3 The policy does not seek to regulate advertising on privately owned assets or determine decisions under separate regimes.

2. Recommendations

- 2.1 Cabinet approves the Advertising and Sponsorship Policy in Appendix 1, including the safeguards, prohibited and restricted categories, governance arrangements, approval levels and review provisions set out in the policy.
- 2.2 Cabinet notes the intention to undertake an initial pilot, identifying 3-5 low-risk sites for advertising wraps, banners and hoardings to test demand for advertising space, the application of the policy, and secure early income. Insights from the pilot will be used to refine future delivery in line with the Council's learning framework.
- 2.3 Cabinet agrees for the Council to join the Coalition to End Gambling Ads (CEGA) and authorises the Director of Public Health and Head of Strategic Communications and Engagement to complete the membership arrangements and prepare appropriate communications activity.
- 2.4 Cabinet delegates authority to the Director for People and Innovation, in consultation with the relevant Cabinet Member, to make minor amendments to the policy and supporting guidance that do not change the substantive purpose of the policy or the prohibitions agreed by Cabinet.

3. Context and background information

- 3.1 The council owns and manages a wide portfolio of assets, amenities and infrastructure, and delivers events, programmes and schemes that provide a material opportunity for income generation from advertising, sponsorship and brand activation. A recent asset audit indicates that the city has good underlying advertising fundamentals, including a recognised national and international identity; major visitor economy; prominent seafront; significant retail, leisure and hospitality activity; strong events profile; and substantial student population and younger resident profile. To-date, the commercial opportunities presented by these characteristics have not been maximised, largely because of fragmented decision-making and engagement with partners and agencies. A coordinated approach to managing commercial partnerships across all council-owned and managed assets, supported by this policy, will maximise the value of these opportunities and deliver more sustainable income streams for the Council. This is a practical opportunity to make a positive contribution to the Council's Medium Term Financial Strategy by converting currently underused advertising, sponsorship and partnership potential into managed, recurring income.
- 3.2 The opportunities identified for council-owned and managed assets are broad and varied, including freestanding digital advertising units, large-format advertising, temporary building wraps or banners, brand activations,

partnerships, and smaller scale public-realm opportunities such as bicycle parking, guardrails and wayfinding signage. To ensure future commercial activity upholds the Council's values, corporate priorities and legal obligations, the proposed policy establishes a control framework, setting out the conditions under which advertising, sponsorship and commercial partnerships are acceptable, namely they must;

- protect public trust in line with council values and priorities,
- support the Council's social, health, equality and environmental objectives, and
- contribute positively to the quality, accessibility and identity of the public realm.

3.3 Crucially the policy includes an assessment framework, ethical safeguards and an approval matrix to ensure impartiality and compliance with statutory guidance and industry codes of practice. It will allow the Council to shape a coherent, city-wide opportunity pipeline rather than relying on ad hoc, service-level decisions.

3.4 Realising these opportunities will require a disciplined public-realm first approach. This means that decisions about advertising and sponsorship opportunities will start with the purpose, character and use of council-owned places and assets as civic spaces and public-facing channels, rather than with commercial value alone. It is proposed that an initial pilot is run before the end of the calendar year on 3-5 low-risk advertising sites for wraps, banners and hoardings, to test demand, the application of the policy in practice, and to secure early income.

3.5 Existing third-party agreements will remain subject to their contractual terms until they are varied or renewed. Adoption of the policy will not override existing contractual rights or obligations. The policy should be incorporated into new and renewed contracts, with suitable monitoring, removal and termination provisions, so that commercial operators and partners are required to work within the Council's public value tests, public-realm expectations and agreed safeguards.

4. Proposed prohibitions, restrictions and approval matrix

4.1 The policy outlines clear, specific and proportionate prohibitions on advertising, sponsorship and brand activations on council-owned and managed assets that do not align with the Council's values and priorities. It prohibits opportunities that may cause harm, promote illegal activities or undermine public confidence in the Council, for example the promotion of tobacco or gambling. Implementation of the policy will seek to balance freedom of expression and commercial activity with the Council's duties relating to public health, community wellbeing.

4.2 Consistent with this proposed prohibition the Council has been invited to join the Coalition to End Gambling Ads (CEGA). Joining CEGA aligns with the Council's commitment to putting the wellbeing of residents first and helps create a healthier, more inclusive city that protects children and vulnerable

adults from potential harm. Being a member will strengthen a key aim of the Advertising and Sponsorship policy in ensuring that commercial activity on council assets is aligned with public health objectives and community wellbeing. As a member, the Council may share campaign content, contribute to events or political roundtables, or develop its own campaigns.

- 4.3 The policy also incorporates the existing approach to the advertisement of food and non-alcoholic drink products high in fat, salt or sugar, and advocates for a product-based view rather than a blanket prohibition on brands. This enables businesses to advertise compliant, healthier products. Alcohol advertising and sponsorship will be considered only on a restricted, case-by-case basis, taking account of content, placement, audience, public health and reputational risk. The same will apply to financial services where products are not exploitative and messaging is responsible and clear.
- 4.4 All advertising, sponsorship and brand activation propositions on council-owned and managed assets will be assessed for their public and commercial benefit; compliance with the policy and applicable law; and the regulatory history of the proposed advertiser or sponsor. Wider impacts on public health; equality; safeguarding; accessibility; climate and the environment; heritage; highways and public realm are also part of the assessment framework. Application of this framework will not predetermine decisions taken under separate statutory regimes, including planning licensing highways and procurement functions.
- 4.5 A proportionate approach to approvals is proposed whereby opportunities assessed as low-risk will be approved by the relevant Head of Service, in consultation with Strategic Communications and Engagement. Medium-risk opportunities, which may include new partners, restricted categories and higher value proposals, will require relevant Director or delegated senior officer approval. High-risk opportunities that may be high-profile, particularly sensitive or novel, will require a decision by the relevant Corporate Director with Cabinet Member involvement as appropriate. Any substantive departure from the agreed policy will be referred back to Cabinet.
- 4.6 The policy will be reviewed annually, or sooner where legislative, public health, or strategic priorities change.

5. Analysis and consideration of alternative options

- 5.1 Without a policy in place there will continue to be a disjointed approach to approval of advertising, sponsorship and brand activations, relying on service-level decisions or policy set by agencies and contractors. Whilst this would retain flexibility, it leads to inconsistent controls, the loss of potential value, unclear accountability, a lack of central oversight and avoidable reputational and regulatory risk. It is therefore not the recommended way forward.

- 5.2 Adopting any wider blanket prohibitions could simplify decision-making but unnecessarily limit appropriate commercial opportunities and the scope of income generation. The proposed approach uses absolute prohibitions for the clearest harms and proportionate, product-based or case-by-case controls for other categories, whilst prioritising community wellbeing and public value.
- 5.3. Not becoming a CEGA member would avoid external affiliation but not reflect the policy's proposed position on gambling advertising or support the Council's commitment to protecting vulnerable children and adults and promoting community wellbeing. Almost 20 other local authorities across the UK are already members. Membership has no fee and the Council can determine the extent of its involvement.

6. Community engagement and consultation

- 6.1 The draft policy was initiated through conversations with other local authorities about their approach to commercial activity and governance of income generation from advertising. It has been informed by a wide review of other council policies and discussions with lead Members about the impact of other commercial partnership activity in the city and its alignment with council values and priorities.
- 6.2 The draft has been developed further through cross-departmental input, including Strategic Communications and Engagement, Public Health, Culture and Events, Property, Planning, Licensing and operational services. This has helped to strengthen the policy by broadening its scope, further clarifying prohibited and restricted categories, enhancing the regulatory and public health safeguards, and ensuring that planning, heritage, equality, reputational and commercial considerations are properly reflected. The engagement has also made the policy more practical to implement by refining its due-diligence requirements, approval and escalation routes, supported by officer guidance and a proposed test-and-learn delivery approach.

7. Financial implications

- 7.1 The policy establishes controls but does not itself guarantee income. As opportunities are developed, they are expected to contribute to the Council's Medium Term Financial Strategy by generating new revenue from council-owned and managed assets. Each opportunity will require a proportionate assessment of income, costs (including legal, procurement, finance, property and operational services), liabilities, tax and business rates, officer capacity and any benefit in kind. CEGA membership carries no fee.

Name of finance officer consulted: Ishemupenyu Chagonda
Date consulted: 11/09/2026

8. Legal implications

- 8.1 The policy and any legal agreement entered into by the Council must operate within applicable advertising, local government, equality, procurement, subsidy control, planning, highways, licensing, data protection and contract requirements. Adoption of the policy will not override existing contractual rights or predetermine statutory decisions. Written agreements and legal review will be required proportionate to the risk and value of each arrangement

Name of lawyer consulted: Siobhan Fry Date consulted: 24/09/26

9. Risk implications

- 9.1 Without a council-wide framework there is a risk of inconsistent decisions, inappropriate associations, unmanaged conflicts, non-compliance with contractual or statutory requirements and damage to public trust. The proposed mitigations are clear prohibitions, documented assessment criteria, tiered approvals, specialist advice, written agreements, central oversight, a decision register, removal and termination arrangements and scheduled review.
- 9.2 Implementation risks include potential effects on income, delay caused by unclear approval routes, inconsistent application between services and attempts to apply the policy beyond existing contractual rights. These will be managed through clear guidance, named ownership, contract review, the and monitoring of financial and operational effects. Any further risks and issues affecting implementation will be teased out through an initial pilot phase, focused on 3-5 low-risk wraps, banners and hoardings sites to test demand and secure early income.
- 9.3 There is also a risk that delivery costs and officer capacity requirements could reduce net income if not managed carefully. This will be mitigated by assessing the full cost of delivery before progressing opportunities and ensuring that implementation costs are recovered from generated income wherever possible.

10. Equalities implications

- 10.1 The policy is intended to reduce exposure to harmful, exploitative, discriminatory or misleading advertising and provide additional safeguards for children and vulnerable residents. Decisions will consider the Public Sector Equality Duty, accessibility, placement and likely audience. A full equalities impact assessment is in Appendix 2.

11. Sustainability implications

- 11.1 Proposals will be assessed for energy and resource use, carbon emissions, waste, biodiversity, air quality, the environmental practices and potential environmental harms of proposed advertisers and sponsors' products, brands or services, and the effect on the public realm. Requirements for digital infrastructure will address efficiency, maintenance, operating hours and end-of-life arrangements where appropriate.

12. Health and Wellbeing Implications

- 12.1 The policy supports a healthier advertising environment through the proposed prohibition of gambling, tobacco, vaping and exploitative financial products, product-based HFSS restrictions and case-by-case controls for alcohol, other financial products, services or brands with potentially harmful environmental impacts. Joining CEGA supports the Council's proposed position on preventing gambling-related harm.

Other Implications

13. Procurement implications

- 13.1 Advertising, sponsorship and brand activation opportunities may constitute concessions, licences, leases, services, works or mixed arrangements. The appropriate route to market will be determined for each opportunity. New procurements and contracts will include policy compliance, social value, reporting, transparency, audit, removal, termination and reinstatement provisions.

14. Crime & disorder implications:

- 14.1 The policy prohibits content promoting illegal, violent or socially harmful behaviour and supports restrictions relating to addictive substances and gambling. Site-specific proposals will also consider lighting, obstruction, pedestrian safety, anti-social behaviour and other community safety implications.

15. Conclusion

- 15.1 The proposed policy provides the foundation needed to pursue advertising and sponsorship income responsibly. It makes the Council's red lines explicit, introduces proportionate approval and escalation routes, protects statutory and regulatory independence, and creates the records and contractual controls required for accountability and audit.
- 15.2 Approving the policy, initial pilot and CEGA membership will allow the Council to balance commercial ambition with public health, equality, safeguarding, environmental and reputational responsibilities. The pilot will provide practical learning, in line with the learning framework, to refine implementation before activity is scaled to making a sustainable contribution to the Council's Medium-Term Financial Strategy.

Supporting Documentation

Appendices

1. Advertising and Sponsorship Policy
2. Equality Impact Assessment

