

Meeting of:	Cabinet
Date of Meeting:	Thursday, 04 September 2025
Relevant Scrutiny Committee:	Resources Scrutiny Committee
Report Title:	Restrictions on High in Fat, Sugar and Salt (HFSS) advertising - Updated Advertising and Sponsorship Protocol
Purpose of Report:	To update the protocol in line with the Council's policy commitments
Report Owner:	Executive Leader and Cabinet Member for Performance and Resources
Responsible Officer:	Director of Corporate Resources
Elected Member and Officer Consultation:	<p>Head of Finance/Section 151 Officer</p> <p>Monitoring Officer/Head of Legal & Democratic Services Operational Manager Property</p> <p>Operational Manager Transport Services</p> <p>Operational Manager Strategy and Insight</p> <p>Operational Manager - Communications, Participation, Equalities and Directorate Development</p> <p>Principal Tourism and Marketing Officer</p>
Policy Framework:	This report is a matter for Executive decision by Cabinet
<p>Executive Summary:</p> <ul style="list-style-type: none"> To support its objective of reducing health inequalities in the Vale of Glamorgan the Council will no longer allow the advertising of High in Fat, Sugar and Salt (HFSS) products on Council owned sites and across the Council's online presence. This is the first such restriction to be introduced by a Local Authority in Wales. It is the outcome of a collaborative project with the Cardiff and Vale University Health Board (UHB) Public Health team. The Vale of Glamorgan Council Advertising and Sponsorship Protocol was agreed in 2018 and requires updating in line with the Council's policy framework, particularly a commitment to healthy advertising and marketing made through the regional Amplifying Prevention partnership. 	

- The updated protocol restricts the advertising of High in Fat, Sugar and Salt (HFSS) products on Council owned sites and across the Council's online presence.

Recommendations

1. That Cabinet approves the updated Advertising and Sponsorship Protocol contained in Appendix A attached to this report.
2. That Cabinet approves the accompanying Food and Drink Advertising Approval Guidance contained in Appendix B attached to this report.
3. That, subject to Recommendation 1, Cabinet delegates authority to the relevant Head of Service in consultation with the Executive Leader and Cabinet Member for Performance and Resources, Director of Corporate Resources and Head of Finance/Section 151 Officer to promote and agree sponsorship and advertising opportunities and award necessary contracts in line with the Advertising and Sponsorship Protocol contained in Appendix A. Where it is deemed appropriate to do so, further reports to Cabinet on specific opportunities will be reported.

Reasons for Recommendations

1. To ensure that advertising and sponsorship activity is undertaken consistently in line with the Council's Corporate Plan and wider policy agenda and contracts are agreed in line with defined processes and emerging regional and national policy to support people in making healthier food and lifestyle choices.
2. To ensure advertising and sponsorship activity is managed in accordance with the Advertising and Sponsorship Protocol and, where in certain circumstances it is deemed to be appropriate to do so, that individual reports are brought to Cabinet in due course.
3. To ensure that the process for progressing any changes is undertaken efficiently and effectively in accordance with the Council's policies and procedures and that the views of the Scrutiny Committee are taken into account.

1. Background

- 1.1 The Council operates a considerable number of advertising sites across the Vale of Glamorgan. The majority of these are at Council maintained bus stops and other fixed locations adjacent to the public highway.
- 1.2 Advertising at most of the sites is administered through an agreement with a third party.
- 1.3 The Council's current Advertising and Sponsorship Protocol sets out what forms of advertising can be considered for such sites. This was agreed in April 2018 as part of the report Reshaping Services – Income Generation and Commercial Opportunities.
- 1.4 The protocol sets out the terms upon which advertising and sponsorship activities may be sought and accepted by the Council.
- 1.5 The protocol was produced to support the delivery of a number of strategic objectives and policy principles contained within the Council's previous Corporate Plan and Income Generation and Commercial Opportunities Strategy.

- 1.6** Vale 2030, the Council's Corporate Plan and wider policy framework has set new and ambitious objectives for the Council to tackle health inequalities in the Vale of Glamorgan. The Reshaping strategy has renewed the Council's focus on identifying opportunities for income generation. The protocol has now been updated to reflect this.

2. Key Issues for Consideration

- 2.1** Restricting the advertising of foods high in fat, salt, and sugar (HFSS) is a tested public health intervention aimed at reducing obesity and diet-related illnesses across the UK. Evidence shows that exposure to HFSS advertising particularly among children contributes to unhealthy dietary preferences and increased calorie intake, thereby exacerbating rates of obesity and related non-communicable diseases.
- 2.2** The UK Government has legislated comprehensive advertising restrictions through the Health and Care Act 2022, which amends the Communications Act 2003. These measures include a 9pm watershed for HFSS advertising on broadcast television and a 24-hour ban on paid-for HFSS advertising online, effective from 5th January 2026.
- 2.3** A number of Local Authorities in England have taken proactive steps to introduce restrictions on advertising. For example, London Boroughs such as Southwark and Haringey have implemented local advertising bans on HFSS products across Council-owned media and public transport networks. These initiatives have shown promise in reducing exposure to unhealthy food marketing and aligning local policy with national health objectives.
- 2.4** In Wales, the advertising restrictions support broader public health strategies, including the Healthy Weight: Healthy Wales plan, which aims to reduce obesity and promote healthier lifestyles. This national strategy recognises the role of environmental and commercial determinants of health, including advertising, and advocates for systemic changes to support healthier choices. The UK-wide advertising restrictions directly reinforce these goals by limiting the commercial promotion of HFSS products to Welsh audiences.
- 2.5** Locally, the Move More Eat Well Plan and its successor the Good Food and Movement Plan developed by the Vale of Glamorgan Public Services Board (PSB), Cardiff Public Services Board (PSB) and the Regional Partnership Board (RPB) both identified 'healthy advertising and marketing' as priority areas, with a particular focus on public sector policy development.
- 2.6** Welsh Government's national strategy to prevent and reduce obesity in Wales, Healthy Weight: Healthy Wales, also highlights the importance of positive marketing of healthier foods and restricting the advertising of products that are high in fat, sugar and salt (HFSS). This is reflected in National Priority Area 1: Shifting the food and drink environment towards healthier options.
- 2.7** This year the Future Generations Commissioner called for a plan to halt the rise in obesity within five years, reverse it within ten and create a Wales that

- supports healthy weight by default by 2035 and for prevention to be established as a core strategic objective in corporate strategies and planning.
- 2.8** Amplifying Prevention is a partnership between the Cardiff and Vale University Health Board (UHB), Vale of Glamorgan Council and Cardiff Council to amplify prevention and reduce inequalities. The partnership is a legacy of partnership arrangements introduced during the pandemic and recognises that collective action on specific issues relating to public health can be taken to amplify the prevention work underway within individual organisations or partnerships by applying the principle of proportionate universalism
- 2.9** In April 2022 colleagues from the UHB attended a meeting of the Council's Strategic Leadership Team to discuss priorities for the Vale of Glamorgan. At this meeting SLT agreed that work to progress policy development around restricting HFSS food and drink advertising and increasing opportunities for healthier advertising should be taken forward.
- 2.10** Following SLT's commitment, work has progressed to research the impact advertising foods that are HFSS are having on the public. Research has found that the negative impact is likely to be greater for children and young people and for those living in areas of deprivation as these groups are more likely to be exposed to HFSS advertising through a variety of mediums.
- 2.11** Exposure to HFSS advertising for children is particularly concerning as it can be found to lead to strong brand awareness, stronger HFSS preferences, more snacking and over consumption, HFSS food replacing healthier foods impacting on children's diets/weight and potentially leading to a range of health and social harms.
- 2.12** A local study undertaken by the Public Health Intervention Responsive Studies Team (PHIRST) in partnership with the Vale of Glamorgan Council, Cardiff Council and Cardiff and Vale Public Health Team aimed to evaluate public perceptions of HFSS advertising and of the planned policy changes. There was a high level of awareness of advertising considered to be HFSS amongst residents of Cardiff and the Vale of Glamorgan. Exposure to advertising was not limited to the areas where people lived, as people travelled across Cardiff and the Vale of Glamorgan for both leisure and work. Children and young people demonstrated a higher awareness of perceived HFSS advertising in their environment than adults. Participants were generally positive towards a policy that would restrict the advertising of HFSS products across Council owned and contracted sites with positive impacts from the policy perceived on food and drink purchasing behaviours, health, environment and wider policy expansion.
- 2.13** Many of these negative impacts have been evidenced on children across the globe by the [World Health Organisation](#). Creating positive food environments that promote and enable healthy food and drink choices can help to drive behaviours and eating patterns in a positive way.
- 2.14** Data from the [Childhood Measurement Programme](#) shows that whilst the Vale of Glamorgan has the highest percentage of children age 4/5 classed as healthy or underweight in 2018/19 when compared to all other Welsh Local Authorities at

82.1% (significantly higher than Welsh average at 73.1%), 17.9% of children aged 4/5 are obese or overweight.

- 2.15** A Healthier Advertising event was held bringing together stakeholders from across the Vale of Glamorgan Council, Cardiff Council and the UHB. The purpose of the event was to explore how opportunities for healthier advertising could be increased as well as developing local policies opportunities to limit the advertising, marketing and promotion of HFSS foods and drinks. Stakeholders agreed that the best way forward was to establish local working groups in each organisation to develop localised healthier advertising policies. To ensure a coordinated approach the different working groups will share lessons learnt and materials ensuring work is aligned to Amplifying Prevention and Move More Eat Well.
- 2.16** A group of colleagues from both Local Authorities and the UHB has been working since to scope local policies and guidance and understand the impact of reducing these. In 2025 it determined that such restrictions could be implemented without a significant impact on the income generated by advertising and sponsorship contracts.
- 2.17** The Vale of Glamorgan successfully tendered its primary advertising contract with a restriction on HFSS advertising in June 2025. It is anticipated this will come in effect in September 2025.

3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?

3.1 Creating Great Places to Live, Work and Visit

By reducing the visibility and influence of unhealthy food advertising, especially in public spaces and transport networks, the policy contributes to healthier environments. This supports the creation of communities that promote well-being, encourage active lifestyles, and reduce health inequalities—making the Vale of Glamorgan a more attractive and supportive place to live and work.

3.2 Respecting and Celebrating the Environment

HFSS advertising restrictions can indirectly support environmental goals by encouraging more sustainable food choices and reducing the demand for highly processed products, which often have larger environmental footprints. Promoting healthier, locally sourced alternatives aligns with the Council's ambition to respect and protect the natural environment.

3.3 Giving Everyone a Good Start in Life

Children are particularly vulnerable to the influence of HFSS advertising. Restricting such marketing helps protect young people from developing unhealthy eating habits early in life, thereby supporting better physical and mental health outcomes. This aligns directly with the Council's objective to ensure that every child in the Vale of Glamorgan has the best possible start.

3.4 Supporting and Protecting Those Who Need Us

Communities experiencing deprivation are disproportionately exposed to HFSS advertising and suffer higher rates of diet-related illness. Advertising restrictions help reduce this inequality by creating fairer food environments and supporting vulnerable groups in making healthier choices. This contributes to the Council's commitment to protect and support those most in need.

3.5 Being the Best Council We Can Be

- 3.6** Implementing and supporting evidence-based public health policies such as HFSS advertising restrictions demonstrates leadership, innovation, and responsiveness to community needs. It reflects the Council's ambition to be forward-thinking, collaborative, and committed to improving outcomes for all residents.

3.7 Long-term

Restricting HFSS advertising addresses the long-term health impacts of poor diet, including obesity, diabetes, and cardiovascular disease. By reducing exposure to unhealthy food marketing—especially among children—this policy helps prevent future generations from inheriting a public health crisis, thereby safeguarding long-term well-being.

3.8 Prevention

The policy is inherently preventative. It aims to reduce the risk of diet-related illnesses before they develop by tackling one of the root causes: the pervasive marketing of unhealthy foods. This supports the Act's emphasis on preventing problems rather than reacting to them later, which is more costly and less effective.

3.9 Integration

Advertising restrictions contribute to multiple national well-being goals simultaneously, including:

- 3.10** A healthier Wales by promoting better nutrition.
- 3.11** A more equal Wales by reducing the disproportionate impact of HFSS advertising on children in deprived communities.
- 3.12** A globally responsible Wales by aligning with international public health standards and commitments.
- 3.13** This integrated approach reflects the Act's requirement to consider how decisions impact all aspects of well-being - social, economic, environmental, and cultural.

3.14 Collaboration

The development and implementation of advertising restrictions involve collaboration between UK Government, Welsh Government, Local Authorities, public health bodies, and civil society. This cooperative effort ensures that the policy is informed by diverse perspectives and expertise, enhancing its effectiveness and public support.

3.15 Involvement

Public engagement has been central to shaping health policies in Wales, including the Healthy Weight: Healthy Wales strategy. Involving communities, especially young people and families, in discussions about food environments and advertising ensures that policies reflect lived experiences and local needs.

4. Climate Change and Nature Implications

- 4.1** HFSS foods are often ultra-processed and rely heavily on industrial agriculture, long supply chains, and energy-intensive manufacturing. By reducing their promotion, advertising restrictions can help shift consumer demand toward healthier, less processed, and more locally sourced foods - many of which have a lower carbon footprint.
- 4.2** Highly advertised HFSS products are often impulse purchases and may contribute to overconsumption and food waste. By curbing their visibility, people may make more intentional and sustainable food choices, which helps reduce waste and the associated emissions from production, transport, and disposal.
- 4.3** Advertising restrictions can create space for promoting healthier alternatives, including local and seasonal produce. These foods typically require less transportation and packaging, reducing greenhouse gas emissions and supporting local economies.

5. Resources and Legal Considerations

Financial

- 5.1** The recent tender exercise demonstrates that there will be no negative impact on the income generated through advertising and sponsorship as a result of implementing this restriction.
- 5.2** Councils elsewhere in the UK have already brought in policies that restrict the advertising and promotion of HFSS foods and drinks across their assets (e.g. bus stops, digital displays, and road signs), their buildings and their communication mechanisms (e.g. websites, social media, and print materials).

Employment

- 5.3** There are no employment issues associated with this report.

Legal (Including Equalities)

- 5.4** There are no specific legal considerations arising as a direct result of this report.

6. Background Papers

The Vale of Glamorgan Council Advertising and Sponsorship Protocol (2018)

[Advertising and Sponsorship Protocol \(valeofglamorgan.gov.uk\)](http://valeofglamorgan.gov.uk)

[Healthier Advertising in Cardiff and Vale of Glamorgan - NIHR Public Health Interventions Responsive Studies Teams \(PHIRST\)](#)



Vale of Glamorgan Council

Advertising and Sponsorship Protocol

Version 1.1

August 2025

Vale of Glamorgan Council – Advertising and Sponsorship Protocol

1. Document Purpose

- 1.1 To safeguard the reputation of the Vale of Glamorgan Council, its members, partners, and officers and to ensure protection for service users, a set of guidelines is required for the management of advertisements and sponsorship activities by the Council.
- 1.2 The Vale of Glamorgan's Advertising and Sponsorship protocol sets out the terms upon which advertising and sponsorship activities may be sought and accepted by the Council.
- 1.3 The Council has a commitment to seek and develop commercial advertising and sponsorship opportunities that support the strategic delivery of corporate objectives both directly and indirectly.
- 1.4 This protocol aims to advise Council members, partners, officers and prospective advertising and sponsorship partners on what are, and are not, acceptable forms of advertising and sponsorship for the Council. The protocol relates to current and prospective advertising and sponsorship opportunities connected to the Council's buildings, assets, and physical resources, and both new and existing products and services, including events.

2. Definitions

- 2.1 Advertising is an agreement between the Council and the advertiser, whereby the Council benefits (in the form of funds, resources or services) from the advertiser in exchange for publicity in the form of advertisement via one or more of the Council's buildings, assets, physical resources, products or services, including events.
- 2.2 Sponsorship is a relationship of mutual benefit between the Council and sponsor whereby the Council receives benefits (in the form of funds, resources or services) from the sponsor in exchange for a set of rights and association to one or more of the Council's buildings, assets, physical resources, products or services, including events.

3. Guiding Principles

3.1 Advertising Principles

The general principles that should be followed when placing an advertisement via the Council are:

- Advertisers must ensure that each advert complies with all relevant rules of law, regulations, or codes of practice. In particular the adverts must adhere to the codes of conduct laid down by the Advertising Standards Authority –

in both letter and spirit.

- The adverts must contain nothing which is in any way defamatory, obscene or illegal or which infringes copyright or any other intellectual property rights or other rights belonging to a third party or which if published or displayed would constitute a breach of contract or confidence or the publication or display of which is for any reason unlawful.
- All adverts must be lawful, accurate, decent, honest, and truthful and created with a sense of social responsibility.
- All adverts will be clearly labelled as such, and it should be noted the Council does not endorse any products or services advertised through any of its channels. The Council will not carry any advert that may detract from its brand or identity. Adverts may only use the Council's name or brand with written permission from the authorised person.
- Legal liability for the content of any advert placed in line with this Protocol will rest with the Advertiser and the Council will be indemnified by the Advertiser in respect of any claims.
- All advertisements and sponsorship arrangements must be in line with the Healthier Advertising policy agenda developed by the Cardiff and Vale Amplifying Prevention Board.

3.2 Sponsorship Principles

The general principles that should be followed when entering into a sponsorship arrangement with the Council are:

- The sponsorship income must be of relatively low enough value not to influence the Council's current or future dealings with that sponsor and the sponsor has the annual budget to provide this sponsorship.
- No sponsor will be preferred above another, except where there are defined classes of sponsor.
- Terms of publicity must be entered into by all parties involved to ensure probity.
- The Council will not carry advertisements or work with organisations where the company's products or services relate to/are:
 - For gambling services (excluding lotteries carried out for charitable purposes).
 - For Sexual Services (excluding counselling or health related services where written permission has been obtained).
 - For Pornographic services.
 - Of a religious nature.
 - Discriminatory on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race religion or belief/non-belief, sex, and sexual orientation.
 - Of a political nature.
 - Where the advertiser is currently undergoing (or expecting to do so imminently) a procurement process with the Council.

- Financial institutions, retailers, and any other loan advancers with punitive interest rates for short term lending.
- The Council will not carry advertisements for food and drink that is high in fat, salt, or sugar (HFSS).

3.3 The above list is not exhaustive, and the Council retains the right to refuse advertising or sponsorship on the grounds that, in the Council's opinion, it is inappropriate, or it conflicts with services already provided by the organisation or it could bring the Council into disrepute. The Council reserves the right to remove advertising or withdraw from sponsorship arrangements without reference to the partner company if the Council's reputation is brought into disrepute as a result of the actions of the advertiser/sponsoring organisation.

4. Procurement Guidance

- No advertising or sponsorship arrangement will influence any decision (including the award of contracts) of the Council or its officers or members.
- No requirement for advertising or sponsorship will be sought during any future procurement exercises.
- Any concerns relating to any perceived influence of decision making must be reported to the Head of Finance/Section 151 Officer the Head of Audit.

4.1 In addition to the above, advertisers and sponsors should confirm they meet the Council's standard on both ethical and equality policies.

5. Application of this protocol

5.1 In line with this protocol, prospective advertisers and sponsors wishing to enter into an agreement with the Council are offered the opportunity to promote their brand through advertising or sponsoring via a single channel or a 'package' arrangement encompassing a variety of Council assets, products and services to be coordinated by the Council's corporate communications team, in liaison with the relevant service area(s).

5.2 Additional guidance on determining which food and non-alcoholic drink advertisements are considered acceptable is given in the Vale of Glamorgan Council Food and Drink Advertising Approval Guidance.

6. Roles and Responsibilities

- 6.1 The Operational Manager – Corporate Communications is responsible for the day to day management of this protocol and its application to advertising campaigns and sponsorship arrangements that are offered to or sought by the Council.
- 6.2 In the Operational Manager – Corporate Communications' absence the responsibility outlined above will be carried out by their line manager.
- 6.3 In the event that any advertising or sponsorship campaign does not clearly fall within the guidance contained in this protocol, the Director of Corporate Resources will be consulted to reach a determination, liaising as required with the relevant service Director and the Council's Leader.
- 6.4 All sponsorship and advertising opportunities and subsequent contracts should be promoted, agreed, and awarded by the relevant Head of Service, liaising as required with the Council's Leader, Director of Corporate Resources and Section 151 Officer.
- 6.5 All Advertising and Sponsorship Agreements must be referred to Legal & Financial Services for review prior to agreement where the value exceeds £1,000 or where any queries relating to the potential appropriateness of the sponsoring/advertising company exist.
- 6.6 Where it is deemed appropriate to do so, reports to Cabinet on specific opportunities will be reported.
- 6.7 It is recommended that all potential advertising partners and sponsors are referred to this protocol.

7. Monitoring and Review

- 7.1 This protocol will be reviewed annually. Any significant changes will be reported to Cabinet for approval.

Vale of Glamorgan Council Food and Drink Advertising Approval Guidance

1. General Principles – determining HFSS products

- 1.1. The UK Government Nutrient Profiling Model (NPM) is widely used and has been subject to rigorous scientific scrutiny, extensive consultation, and review. Furthermore, the scoring system it uses balances the contribution made by beneficial nutrients that are particularly important in children's diets with components in the food that children should eat less of.
- 1.2. It has therefore been concluded that the NPM model is the best way of identifying food that contributes to child obesity. Such food and non-alcoholic drink is not only purchased directly by children but is bought for them by others.
- 1.3. Guidance on how to identify whether a product is considered a high fat, salt, sugar foodstuff (HFSS) under the NPM has been [published by the Department of Health and Social Care](#).

2. Practical exceptions

- 2.1. The NPM allocates points on the basis of the nutrient content of 100g of a food or non-alcoholic drink and does not differentiate between products on the basis of typical portion size or manner of consumption.
- 2.2. There are no exceptions to the policy. The Vale of Glamorgan Council understands there may be some limited unintended consequences of applying this policy, but has concluded that these consequences do not justify the public expenditure required to establish, run and monitor a general exceptions process.
- 2.3. Ad hoc exemptions can be granted by the Vale of Glamorgan Council. Where exemptions are granted:
 - 2.3.1. Advertisements and/or supporting copy should not suggest that the product(s) are 'healthy', given their overall HFSS rating;
 - 2.3.2. Advertisements and/or supporting copy should be presented in a way that is targeted at adults and adult settings; and
 - 2.3.3. Advertisements and/or supporting copy must comply with the Vale of Glamorgan Council Advertising & Sponsorship Protocol.

3. Advertisements featuring only non-HFSS food and non-alcoholic products

- 3.1. These would normally be approved but would still need to comply with other sections of the Vale of Glamorgan Council Advertising and Sponsorship Protocol.

4. Advertisements featuring only HFSS products

- 4.1. Where a proposed advertisement features only food and/or non-alcoholic drink which is rated HFSS, such copy would be rejected
- 4.2. It is therefore recommended that, before committing to advertising production, if advertisers are unsure, they should discuss their eligibility with the Vale of Glamorgan Council's agents.

5. Advertisements where there is a range of food/non-alcoholic drink featured, some of which is HFSS

- 5.1. The advertising of any HFSS products is unacceptable under the Vale of Glamorgan Council Advertising and Sponsorship Protocol, so a range or meal could not feature them (i.e. a meal could only be featured if all products were non-HFSS). This would also apply to any collection

of ingredients or meal settings being shown, including those for restaurants, aggregator platforms and delivery services.

- 5.2. It is the responsibility of advertisers and their agents to verify the status of the products featured using the NPM.

6. Advertisements where no food or non-alcoholic drink is featured directly but the advertisement is from or features a food and/or non-alcoholic drink brand

6.1. This may include:

- advertisements where the brand's logo is included but no products (e.g. a brand values campaign);
- directional or promotional signage to a store, app or website;
- promotional advertising which is price led but features no products (e.g. '50% off everything');
- advertising about a business or its performance; and
- sponsorship of an event or attraction by a food or non-alcoholic drink brand.

- 6.2. Food and non-alcoholic drink brands (including food and drink service companies or ordering services) will only be able to place such advertisements if the advertisement promotes healthier options (i.e. non-HFSS products) as the basis of the copy.

- 6.3. Where advertisers are uncertain about the classification of proposed copy under these guidelines, they should discuss this with the Vale of Glamorgan Council's agents.

7. Advertisements where food and non-alcoholic drink is shown 'incidentally' (i.e. it is not the subject of the advertisement but is included (or implied) by visual or copy)

- 7.1. HFSS products should not be promoted by being featured in advertisements for other products. It is the responsibility of advertisers and their agents to verify the HFSS status of the products featured using the NPM.

- 7.2. Where a food or non-alcoholic drink item is featured incidentally and does not relate to a specific identifiable product which can be assessed for its HFSS status, the closest product may be analysed or advertising copy may be rejected by the Vale of Glamorgan Council or its agents on the basis that the advertisement promotes the consumption of HFSS foods.

8. Advertisements where food and non-alcoholic drink is referenced in text, through graphical representations or other visual representation

- 8.1. HFSS products should not be promoted through references in text, graphical images or other visual representations of food and non-alcoholic drink. Where a food or non-alcoholic drink item is featured in this way and does not relate to a specific identifiable product which can be assessed for its HFSS status, advertising copy may be rejected by the Vale of Glamorgan Council or its agents on the basis that the advertisement promotes the consumption of HFSS foods.

9. Indirect promotion of HFSS food and/or drink

- 9.1. Where a product is non-HFSS but falls within a category covered by Public Health Wales (PHW's) recommendations for sugar or calorie reduction, the product should always carry a prominent product descriptor to help differentiate it from non-compliant products (e.g. where an advertisement features a non-HFSS pizza or burger, the image should be accompanied by prominent text that names the specific product and retailer).

- 9.2. Children should not usually be shown in advertisements for products which are compliant in a category which is covered by PHW's recommendations for sugar or calorie reduction.

10. Portion sizes

- 10.1. The NPM model is based on nutrients per 100g of a product, rather than recommended portion size. Advertisers should always ensure that they promote products in portion sizes which encourage healthy eating. For products that are non-HFSS but fall within a category covered by PHW's recommendations for sugar or calorie reduction, the product should be displayed as a single portion.