



department for
**culture, media
and sport**

improving
the quality
of life for all

The Government response to advertising and trading regulations London 2012



host government department of the
Olympic and Paralympic Games



Llywodraeth Cynulliad Cymru
Welsh Assembly Government



**The Scottish
Government**

Our aim is to improve the quality of life for all through cultural and sporting activities, support the pursuit of excellence, and champion the tourism, creative and leisure industries.

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Thank you

We would like to thank all those who took the time share their knowledge and expertise in responding to the consultation. The responses have been extremely helpful and have informed the shape of the final regulations.

The UK, Scottish and Welsh Governments promised to respect commitments made to the International Olympic Committee (IOC) in the Host City Contract (which included obligations as to the regulation of advertising and street trading) and to take all necessary measures to ensure that we fulfil our obligations. In the Executive Summary of the consultation we made clear that we are fully committed to regulating advertising and trading in open public places but the extent to which we do this was subject to consultation.

The main issues this consultation sought views on were: the scope of advertising activity and trading which we propose to regulate, the areas within which the regulations will apply (which we called the “event zones”) and the time periods during which the regulations will be in force (which we called the “event periods”). We made it clear, and responders recognised that we were not consulting on whether we regulate advertising and trading in open public places as this was a commitment that the Government had already made.

The proposed regulations were subject to a 12 week public consultation from 7 March to 30 May 2011. Over 600 stakeholders were alerted to the consultation through a variety of methods including letter, email, leaflet drop, and utilising the communication methods of trading, business and advertising associations. In total DCMS received 51 responses to the consultation. The bulk of respondents can be broadly broken down as follows; 18 responses from local authorities and local authority groups, 8 from the advertising and press industry, and 3 from the sporting industry, with the remaining responses coming from a range of individual businesses, traders and residents.

Few respondents questioned the need for the regulations, understanding the requirement to protect sponsors and enhance the UK’s reputation as a host of an international event. Most respondents were broadly positive of the policy direction the Department has taken. The responses on the whole addressed technical detail in specific areas rather than stating that the approach was fundamentally wrong. Almost all respondents considered that the Department had got the timings for the regulations right and a few suggested amendments to the breadth of the zones, expanding or narrowing depending on the specific concerns. The comments on whether the department had got the definition of advertising and trading right and the views expressed on the exceptions were considered and have been very helpful to the department. DCMS has made some changes to the regulations as a result of these comments.

The consultation has contributed significantly and positively to the way the regulations have now been framed and drafted.

We have grouped the responses into sections and have provided the Government’s response at the end of each section. This document should be read alongside the amended regulations which can be found on the DCMS website.

Advertising

Question 1: Have we got the definition of advertising right?

1. 76% of responses to question 1 felt we had got the definition of advertising right or partially right. Respondents generally acknowledged the need to have a broad definition of advertising in order to capture any kind of ambush marketing activity. Some responding bodies also felt it was right that official sponsors should benefit from sponsoring the games.
2. Local authorities and other bodies felt that the definition should explicitly cover the distribution of items outside of the regulated zone for the use of ambush marketing purposes within the zone.
3. Responding bodies felt that the definition of advertising activity as drafted in the regulations would incorrectly capture advertisements directed at the users of Smartphones and other portable electronic equipment resulting in individuals unintentionally breaching the regulations. Respondents felt that this may not have been the intention and as such an explicit exception should be drafted. However some respondents also noted that these devices could potentially be used for ambush marketing purposes if used to display an advertisement to others and that this activity should be caught by the regulations.
4. Responses from the advertising industry also felt that there should be specific reference within the regulations to prevent the use of the human body for the purposes of ambush advertising. For instance, an individual invaded one of the diving events at the Athens 2004 Olympics with the name of a company daubed on his bare chest.
5. A respondent from the sporting goods industry had concerns that existing advertising for commercial sponsorship of community and social projects within regulated zones will fall foul of the regulations as drafted and should be made exempt.

Question 2: Have we made the right exceptions?

6. 71% of respondents who answered question 2 felt that the exceptions were correct or partially correct. A number of respondents suggested amendments to the list of exceptions:
7. Local authorities responding were concerned that the exceptions would allow for temporary occupiers of business premises within the regulated zones to legitimately rent properties for the sole purpose of ambush marketing during the Games.
8. One local authority welcomed the exception that permits existing advertising that benefits from deemed consent. However they noted that enforcing the regulations may be problematic if these sites are not easily identifiable to enforcement officers.

“The regulations will have an impact on us as a campaigning group, but from the way that the regulations are drafted they do appear to allow space for genuine campaigning activities.”

Trade Unions Congress

9. One respondent felt that charities should not be excluded from the advertising regulations and suggested that some charities regularly undertake advertising campaigns intentionally designed to ambush and shock people which would distract from the feel of the Games. They went on to say that by allowing charities to advertise there was a significant risk of the regulated zone becoming overcrowded.
10. One respondent from the advertising industry was concerned that the exemption for advertisements on vehicles (including buses and taxis) could potentially be abused. There is evidence from other high profile sporting events that companies have arranged for advertisements to be placed on vehicles and driven around the vicinity gain brand exposure and association with an event.
11. A number of respondents felt that the exception for advertising on clothing where no ambush is intended should be expanded to cover items carried as well as attire worn. This would ensure that spectators carrying branded items are exempt, unless they are participating in an ambush marketing campaign.
12. One local authority advised that telephone kiosks could be draped in advertising and should therefore be caught by the advertising regulations.

Question 3: Have we got the balance right between protecting sponsors and allowing business to operate as usual?

13. 66% of respondents felt that we had got the balance right or partially right.
14. However respondents also made the point that the balance of the regulations can only truly be determined after they have been interpreted and enforced.
15. A number of responding bodies made the point that businesses in regulated areas would require a clear explanation of the effect of the regulations and enforcement officers would also need clear instructions around the intention of the regulations to be enforced proportionately.
16. Some individual traders that responded felt that the regulations were too restrictive. Whilst some traders acknowledged the need for official sponsors to be protected from their competitors ambushing the Games they also felt that local businesses should be encouraged to maximise potential business opportunities afforded to them by additional footfall as a result of Olympic events in their area.
17. Responding bodies from the advertising industry were concerned that for suspected ambush marketers the burden of proof is reversed and as such the people who are responsible for goods, services or businesses advertised (such as directors or managers of companies whose products are advertised) need to prove that they took all reasonable steps to prevent the activity from happening.

“Local businesses should be able to promote themselves and their wares”

The Hackney Pearl

Government's Response

18. **We accept that there is a risk of individuals unintentionally breaching the regulations by simply going about their normal daily activities; such as viewing the internet on a Smartphone or carrying personal items with visible branding. This clearly is not the policy intent of the regulations. It is helpful to have these specific examples raised and we have amended the regulations to ensure these activities are permitted. We will also make additional changes to prohibit advertising on the human body.**
19. **In line with the Town and Country Planning Regulations 2007 (in Wales the Town and Country Planning Regulations 1992 and in Scotland Town and Country Planning (Scotland) Regulations 1984), these regulations will prohibit advertising on vehicles where the principle aim is to advertise. We feel this is right and proportionate. Extending to all vehicles carrying advertising would be an unreasonable response, although we recognise that this carries a risk.**
20. **Most advertising that currently benefits from deemed consent under the Town and Country Planning Regulations 2007 (in Wales the Town and Country Planning Regulations 1992 and in Scotland Town and Country Planning (Scotland) Regulations 1984), will also be allowed under these regulations. However in some circumstances the deemed consent category has not been transferred to an exempt category in the advertising and trading regulations. This is because there is a potential breach of the objectives underpinning the regulations. In such cases we think it is reasonable to apply an authorisation process to filter activity before it is allowed or disallowed.**
21. **We recognise that wherever a restricted zone is marked out, advertising and trading will be pushed outside of it. There will be a risk that the distribution of items outside the zone will be for the intent and purpose of ambush within the zone. We have made clear in the regulations that arranging (at any time and any place) for advertising activity to take place in an event zone when the regulations apply will contravene the regulations.**
22. **History tells us that the Olympic and Paralympic Games attracts a high level of ambush marketing and unauthorised commercial exploitation. Pursuing those who stand to benefit most from this practice and who are actually culpable, including company directors and land owners, acts as a powerful deterrent. In practice, the prosecutor will be required to prove, beyond reasonable doubt, that an accused committed an offence. The individual has a defence and can avoid liability if they prove that they had no knowledge of the activity or they took reasonable steps to prevent it happening.**
23. **In keeping with existing advertising and trading legislation, the accused must prove the defence on the balance of probabilities. But the matters that a person is required to prove are entirely within their knowledge – that they did not know about the trading or advertising or that they took reasonable steps to prevent the trading or advertising from occurring. This arrangement is consistent with existing law and practice and, in the Government's view, is reasonable and proportionate.**

Trading

Question 4a: Have we got the definition of trading in open public spaces right?

24. 72% of respondents to question 4a felt that we had got the definition of trading in open public spaces right or partially right. Respondents were broadly confident the regulations would cover the majority of eventualities that could take place in an event zone.
25. Local authorities wanted a clearer definition of “open public space.” One local authority also suggested we consider defining “article” in line with existing trading legislation. Another local authority proposed that we amend the regulations to “offer to supply” rather than “offer to sell” as this could simplify prosecutions.
26. Local authorities commented that the definition as drafted would only capture lawful pedlar trading and street collections but would not cover unlawful activity in these areas.
27. Local authorities noted that charitable collections will be disallowed under the regulations. However they commented that the regulations do not capture face to face charitable direct debit canvassing. They felt this activity would have an effect on the look and feel of the Games and should also be brought within scope of the regulations.

Question 4b: Have we made the right exceptions?

28. Local authorities felt we should widen the exemption of deliveries from a vehicle. They suggested that deliveries of non-perishable goods such as domestic fuel and retail supplies should also be permitted
29. One local authority felt the Olympic Delivery Authority (ODA) should consider licensing the numbers of cycle rickshaws and “pedicabs” in regulated areas as they could potentially prevent spectators from moving freely. These vehicles often carry advertisements and could potentially be used for ambush marketing.
30. Local authorities requested further clarity on the authorisation process on the use of tables and chairs on pavements outside cafes and restaurants within the regulated zone. Temporary licences are issued by local authorities under street trading legislation or the Highways Act. The regulations do not provide an exemption for this kind of trading on public land, only private land.
31. One local authority felt that newsvendors are incorrectly exempted and should be brought within scope of the regulations. By requiring ODA authorisation numbers of sellers and their receptacles could be controlled and not hinder access within the regulated zone. There was also concern that allowing newsvendors unregulated and therefore unlimited access to venues could provide an avenue for ambush marketing.
32. The Newspaper Society however were pleased that the supply of newspapers and periodicals were exempted and believed that the caveat “undue interference or inconvenience to persons using the street” was unnecessary.

33. LOCOG commented that they will be trading within the regulated zones. They have suggested that it would reduce administrative burden on the ODA if they were exempt from the authorisation process.

Questions 5a and 5b: Are we impacting on specific groups through these regulations and how can we limit that impact?

34. 89% of respondents to question 5 felt that specific groups would be impacted upon by the regulations. Unsurprisingly the majority of respondents felt that traders within the regulated zone would be impacted upon by the regulations.
35. A respondent from the advertising industry felt sellers of advertising space should be compensated if advertising hoardings remained unsold at Games time.
36. Another respondent noted that venues which regularly host large scale events will already have business arrangements with a variety of traders, some of these traders will only come in to support specific events. If these traders are not authorised by the ODA then this will have an adverse effect on both the venue's and traders' earnings.
37. Local authorities and other stakeholders felt that there is a key role for the ODA to pro-actively engage with businesses in regulated zones in good time ahead of the Games to make in order to make them aware of their obligations under the regulations. One local authority felt that LOCOG and ODA should fund a programme of advice including seminars and one to one support.

"The regulations are complex, particularly in relation to advertising restrictions. Micro businesses are likely to require advice and support to understand their obligations, in some cases on a one to one basis."

Tower Hamlets Council

Government's Response

38. **We want local existing businesses to be able to trade as normal where possible and benefit from additional opportunities brought about by the Games. To help meet this aim we will:**
- **Amend the regulations to permit deliveries of non-perishable goods as well as perishable goods;**
 - **Allow selling and distribution of newspapers and periodicals during Games times but retain the proviso that sellers and distributors must not cause 'undue interference or inconvenience to persons using the street' as this protects the objective of allowing unheeded access to Games venues;**
 - **We will not prohibit "pedicabs" and rickshaws from entering the zone as we deem them to be public transport and providing a service. Such transport providers will have to comply with any other laws that regulate their business.**
39. **We accept there is a potential risk of unlawful pedlars and charity collectors operating unregulated within the zone. Consequently we will amend the regulations to capture this activity.**
40. **Cafes and restaurants that have an outside space with tables and chairs on a public highway will require authorisation by the ODA. This will enable the ODA to effectively limit the activity on public highways. During Games' time there will be considerably more footfall and we want to provide clear routes to venues.**

Event zones and regulated areas

Question 6: Do our event timings allow us to adequately deal with rogue trading or advertising

41. 78% of responses to question 6 felt that the short and specific event timings were appropriate and struck a good balance between meeting the objectives of the regulations and minimising the impact on businesses within the regulated zone.
42. Many local authorities were content with the timings but some made the point that targeted information for businesses in the regulated zone will need to be disseminated in good time before the regulations come into force.
43. Respondents from the advertising industry commented that the event timings would only be sufficient if enforcement officers are given the appropriate powers which enable them to act swiftly to deal with illegal trading and ambush marketing attempts immediately.

Question 7: The event zone will extend to the water and up into the air. Have we got this right?

44. 79% of respondents felt that it was appropriate for the regulations to cover airspace and water as leaving these areas unprotected would leave the Games exposed to ambush marketing activity.
45. Two councils made the point that where the regulated zone is not defined by roads or natural boundaries enforcement may be problematic when determining the offence took place in the regulated zone.

Proposals for additional zones

46. Some respondents suggested additional zones which could be targeted by ambush marketers if left unprotected by a regulated zone:
 - One responding body felt that Heathrow airport, as the official gateway to the Games, should be protected from ambush advertising;
 - Another suggested that we should also include live sites and key stages of the torch relay;
 - One local authority suggested that the West End of London should be within a regulated zone during the Games. They felt that ambush marketers wishing to associate themselves with London 2012 could do so by targeting iconic London buildings.

Map Changes

47. A number of respondents suggested minor changes to the maps, these have been considered and some of these amendments will be reflected in the final regulations.

Government's Response

- 48. We have designed the regulations to ensure minimal disruption for a fixed period of time in very tightly defined areas. We made a policy decision to focus only on the sporting events to be held during the Games themselves as it is crucial that those events are protected to ensure a fantastic spectator experience and protect sponsors' investments. We recognise that there is a risk that other areas may be ambushed however it is the case that wherever the boundary is drawn there is a possibility of increased advertising and trading just the other side. We believe that we are protecting the right space in a proportionate manner and that existing law must be relied upon for all other space.**
- 49. We do accept that iconic London structures are at potential risk to ambush marketing and will extend zones to cover the Palace of Westminster and Westminster Abbey where events take place in the vicinity of those buildings.**
- 50. We also agree that enforcement will be made problematic if zone boundaries aren't easily identifiable by natural landmarks, paths or roads. We will amend maps where necessary to ensure boundaries are clear.**
- 51. We have agreed to a number of small map changes. Generally, map changes have been made to help ensure spectators have a positive experience during the Games. We have extended some zones to capture coach drop-off points and provide clear walking routes from public transport hubs as well as taking into account high rises where there is a risk of ambush advertising.**

Authorisation and enforcement

Question 8: Is the ODA approach to street trading authorisation reasonable and transparent

52. 69% of respondents to question eight felt that the ODA approach to authorising street trading was reasonable and transparent or partially reasonable and transparent.
53. Local authorities broadly felt that the approach was clear and transparent. They particularly welcomed the opportunity to be consulted by the ODA when considering street trading authorisations during Games time. Local Authorities felt existing knowledge of street traders in their area would be valuable in assisting the ODA.
54. A number of respondents felt they needed more information on the criteria that will be used for authorising traders and the financial assistance available before they could pass further comment.

Response by ODA

55. **The ODA will continue to engage and liaise with the relevant Local Authorities regarding existing traders.**
56. **The ODA readily recognises the local authority expertise and local knowledge that will be key in the ODA implementation of the authorisation process. In particular contacts in the authorities concerned are a prime conduit for the ODA to provide information to traders about the effect of the regulations.**
57. **In the autumn the ODA will produce a Detailed Notice providing comprehensive information on the requirements of the regulations. This will translate the regulations into an easy to follow format suitable for all businesses that may be affected by the regulations. The Detailed Notice will be widely publicised and the ODA will make this Detailed Notice available to local authorities to assist them and local traders.**
58. **The authorisation process for trading within the zones will open before the end of the year and applications can be made on line or by post. The application process will be open to anyone but if the application relates to activities that require a licence or any other form of permit or authority this will be a pre-requisite.**
59. **There will be a number of other criteria which will be used in the evaluation of applications for trading during the Games, including crowd safety and security factors.**
60. **The details of the application process will be available on the ODA website and any applicant who is not content with the decision on their application may apply within a set period for a review of the ODA's decision.**
61. **Financial assistance will be considered on a case by case basis through the application process.**

Question 9: Is the LOCOG approach to advertising authorisation reasonable and transparent?

62. 70.5% felt that the LOCOG approach to advertising authorisation was reasonable and transparent or partially reasonable and transparent.
63. Respondents were broadly content that that LOCOG's approach to advertising authorisation was reasonable and transparent. However some respondents felt the process could be more transparent and called for greater clarity around what factors will be taken into account when LOCOG assess applications for authorisation.
64. Respondents from the advertising industry had concerns around unsold advertising space in and around venues. They suggested that advertising sites that remain unsold are dressed appropriately to maintain the look and feel of the Games and not remain blank.
65. They also suggested that appropriate compensation for advertising contractors is considered as they will be required to continue to pay premium business rates on unsold advertising sites.

Response by LOCOG

66. **LOCOG will issue further details of its authorisation strategy in due course but anticipates that discretion will be maintained as necessary to enable it to react to individual circumstances and ensure its obligations to the IOC, IPC and sponsors are met.**
67. **LOCOG recognises the risk that, although it has indicated that sponsors of the Games will be authorised to purchase existing outdoor media sites in the event zones, some of these sites may not be purchased by sponsors of the Games. LOCOG is entering into discussions with the Outdoor Media Centre (the industry's trade body) with a view to authorising the owners of such space to sell it to organisations/companies where this does not conflict with the Games' sponsors or the aims of the regulations.**

Question 10: Is the ODA approach to enforcement reasonable and proportionate?

68. 72% of respondents felt that the ODA approach to enforcement was reasonable and proportionate or partially reasonable and proportionate.
69. Local authorities welcomed the intention to use locally based enforcement officers. However they were clear that additional financial resources would have to be made available to take on this additional work.
70. Local authorities also felt that the police would need to be engaged as they will need to be able to support enforcement officers when required.
71. Local authorities felt that the ODA will need to prepare and deliver a comprehensive training package to inform enforcement officers of the complex regulations and emphasise the light touch approach to enforcement. There was concern from various responding bodies that overzealous enforcement of the regulations would distract from the look and feel of the Games.

"The European Sponsorship Association, while strongly in favour of robust and appropriate measures to protect the rights of official sponsors, warned: It is clear from previous global events that disproportionate ambush protections and overly zealous enforcement of anti-ambush rules can generate very substantial negative media coverage, often with adverse publicity for the event organiser, for the host city and country and for official sponsors. This can significantly damage public perception both of particular sponsors and, more generally, of commercial involvement in sport."

European Sponsorship Association

72. One local authority commented that advice, communication and time spent with individual traders is critical. Timely advice will also serve to prevent unintended transgressions; assist in securing the voluntary removal of unauthorised advertising and, overall, help to ensure that the principles of good enforcement as set out in the Government's Better Regulation Executive's strategy are followed.
73. Responses from the sporting goods industry felt the introduction of a helpline would help prevent infringements by providing immediate and accurate detailed advice.
74. One respondent felt that comprehensive training of enforcement officers is imperative as the regulations are complex and need to be enforced appropriately and proportionately.

Response by ODA

75. **The intention, wherever practicable, is to allow business to continue as usual. Utmost care will also be taken to preserve the enjoyment of the Games for spectators and visitors and to avoid inconvenience and disruption through enforcement, unless it is suspected that persons involved are knowingly participating in illegal activity.**
76. **Through its enforcement policy the ODA will primarily ensure compliance with the Regulations is secured through communication, advice and co-operation. Enforcement powers will only be deployed in unavoidable situations such as where there is deliberate, targeted ambush marketing or persistent and intentional disregard of ODA advice.**
77. **During the Games period enforcement will be undertaken by experienced local authority officers specifically designated by the ODA. The ODA is currently in discussion with the relevant local authorities to secure sufficient designated officers via a memorandum of understanding with each authority. It is expected that in some instances a police presence may be necessary.**
78. **All ODA designated officers will be professionally trained well in advance of the Games periods. The training will include the detailed provisions of the legislation as well as the ODA's enforcement policy and how this is to be implemented**
79. **The ODA's policy is to follow best practice enforcement objectives as set by the Government's Better Regulation Executive.**
80. **The ODA will provide comprehensive information on its website and will enable individual enquiries from traders to be made through the website or via a "helpline" once the application process has opened. The ODA has also reiterated its commitment to offer to attend public or business meetings local authorities may arrange for those affected by the regulations to provide general information and answer specific questions.**

"In respect of deliberate and premeditated campaigns to undermine the official sponsorship programme, the Regulations provide LOCOG with the ability to ensure that it will be able to protect the goodwill associated with London 2012 in particular and the Olympic Movement in general. However, there are serious concerns about how these Regulations will be enforced on the ground against local business during the Games period"

Dr Mark James and Professor
Guy Osborn

Annex A: Responding Bodies

Organisations

1. Advertising Association
2. Anschutz Entertainment Group (the O2)
3. Brent Council
4. British Airways
5. Broxbourne Council
6. CBS Outdoor
7. Coventry City Council
8. Dr Mark James and Prof Guy Osborn
9. Essex County Council
10. European Sponsorship Association
11. Forman's Fish Island
12. Greenwich Council
13. Greenwich Peninsula Regeneration
14. Hackney Council
15. Hertfordshire County Council
16. Incorporated Society of British Advertisers (ISBA)
17. JCDecaux
18. Joint Local Authority Regulatory Services (JLARS)
19. Kingston Council
20. Live Nation
21. The London Organising Committee of the Olympic Games and Paralympic Games Limited (LOCOG)
22. London Trading Standards Association (LOTSAs)
23. Merton Council
24. Newcastle City Council
25. Newspaper Society
26. Nike
27. Outdoor Media Centre
28. Robert Campbell Lloyd - Pedlars.info
29. Peninsula Festival Ltd
30. Professional Publishers Association

31. The Hackney Pearl
32. The Law Society Scotland
33. Tower Hamlets Council
34. Trade Union Congress
35. Trading Standards Institute
36. Trafford Council
37. Transport for London
38. Westminster City Council
39. Weymouth and Portland Council
40. World Federation of Sporting Goods Industry
41. Windsor and Maidenhead Council

Individual Responses

42. H Dave
43. A Davidson
44. I Getty
45. C Hill
46. G Kennedy
47. T King
48. J Macdiarmid
49. S Rayment
50. D Robertson
51. L Tribble

Annex B: Response breakdown.

Question 1: Is definition of advertising correct?

No. of responses	38	
Yes	13	34%
Partially	16	42%
No	9	24%

Question 2: have we made the right exceptions?

No. of responses	38	
Yes	8	21%
Partially	19	50%
No	11	29%

Question 3: Have we got the balance right between protecting sponsors and allowing business to operate as usual?

No. of responses	35	
Yes	9	26%
Partially	14	40%
No	12	34%

Question 4a: Have we got the definition of trading in open public places right?

No. of responses	32	
Yes	14	44%
Partially	9	28%
No	9	28%

Question 4b: Have we made the right exceptions?

No. of responses	29	
Yes	11	38%
Partially	12	41%
No	6	21%

Question 5a: Are we impacting on specific groups through these regulations?

No. of responses	27	
Yes	24	89%
Partially	1	4%

No 2 7%

Question 5b: How can we limit that impact?

Free text response.

Question 6: Do our event timings allow us to adequately deal with rogue trading or advertising?

No. of responses	32	
Yes	20	62%
Partially	7	22%
No	5	16%

Question 7: The event zone will extend to the water and up into the air. Have we got this right?

No. of responses	26	
Yes	16	61.5%
Partially	3	11.5%
No	7	27%

Question 8: Is the ODA approach to street trading authorisation reasonable and transparent?

No. of responses	26	
Yes	12	46%
Partially	6	23%
No	8	31%

Question 9: Is the LOCOG approach to advertising authorisation reasonable and transparent?

No. of responses	27	
Yes	11	41%
Partially	8	29.5%
No	8	29.5%

Question 10: Is the ODA approach to enforcement reasonable and proportionate?

No. of responses	29	
Yes	9	31%
Partially	12	41%
No	8	28%



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