

DAISY WHITEHOUSE
DOWN AT THE SOCIAL

LANCASHIRE MARKETING
JUNE 11TH

HFS LEGISLATION



About Me!

**AGENCY FOUNDER, WORKING IN PR AND SOCIAL MEDIA,
COLLABORATING WITH BIG BRANDS AND SMALL INDIS TO
HELP THEM ACHIEVE THEIR GOALS.**



**DIRECTOR OF THE UK BARTENDERS GUILD & MEMBER OF
THE LANCASHIRE WOMEN'S ENTERPRISE STEERING
COMMITTEE.**

**LOVES WORKING WITH NATIONAL AND REGIONAL
HOSPITALITY BRANDS BIG AND SMALL.**

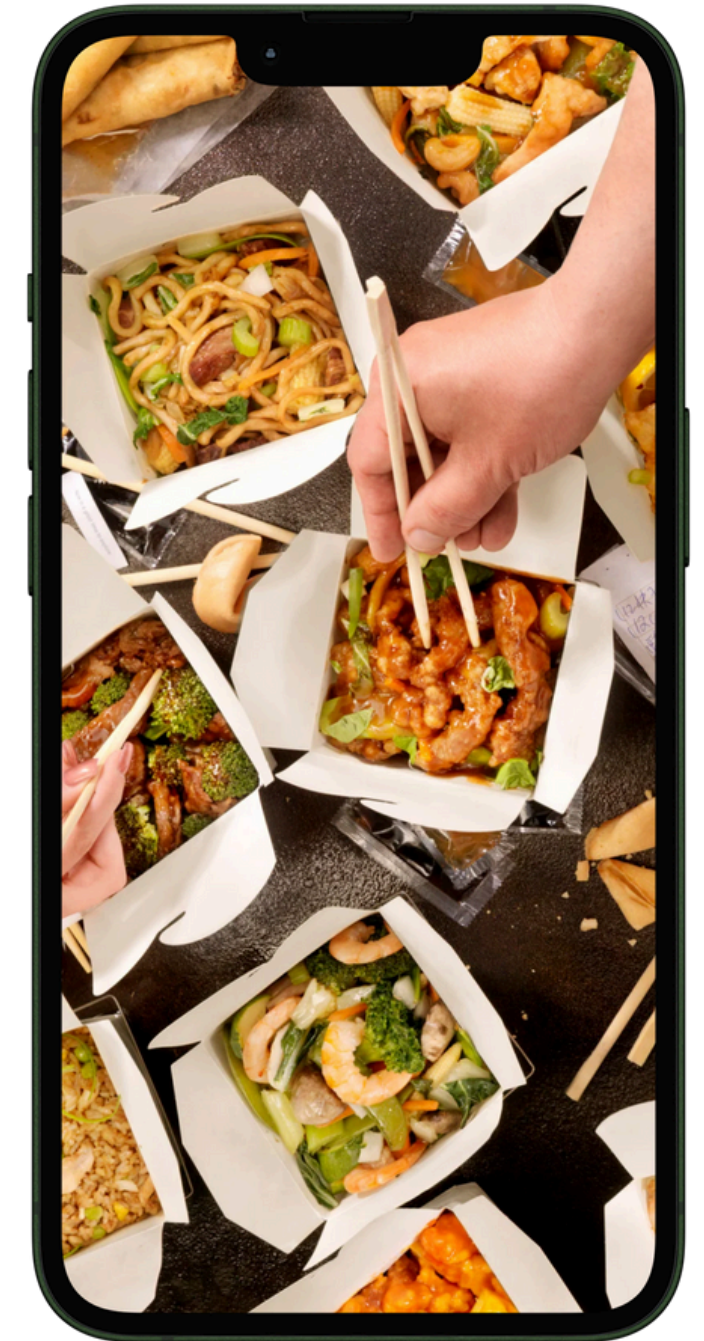


THE LEGISLATION

From 1st October 2025, the UK's new **High Fat, Salt and Sugar** advertising restrictions will officially come into force – banning all paid media promoting foods that don't align with the guidelines.

Paid promotions that don't comply could be pulled without warning, and brands could face heavy fines.

So it's time to rethink your advertising strategy.



HOWEVER! If your business has fewer than 250 employees – you are exempt from this.

HFSS FOODS

ALSO! Breaded and battered products like mozzarella sticks, spring rolls, chicken nuggets and even french fries.

HIGH FAT

Pastries and cakes

Biscuits and sweets

Chocolate

Ice Cream

HIGH SALT

Ready meals

Pizza

Crisps

Fast food

HIGH SUGAR

Breakfast cereals

Fizzy drinks

Smoothies & juice

Syrups

The Nutrient Profiling Model is a UK government system that scores foods based on their content of fat, sugar, salt, fibre, and protein. It's used to identify which products are high in fat, sugar, or salt (HFSS) and help inform policies on food marketing and advertising.

THE NUTRIENT PROFILING MODEL

THE INDEX:

If a food product scores 4 or more on the index, you can't advertise it through paid media.



THE CONTEXT

Back in 2018, the Government announced its **‘Childhood Obesity: a plan for action, chapter 2’** which included a plan to ban promotions of HFSS products.

Then, in 2020, they doubled down and decided to introduce the legislation around it, in hopes to **reduce childhood obesity** rates in the UK.

So from January this year, brands - or those that knew about it - began preparing for the new legislation to come into play.

- **2018**
The plan to ban HFSS advertised was devised.
- **2020**
The bill was passed as part of the UK’s plan to tackle obesity.
- **2025**
Brands gear up for the new legislation.

THE GUIDELINES

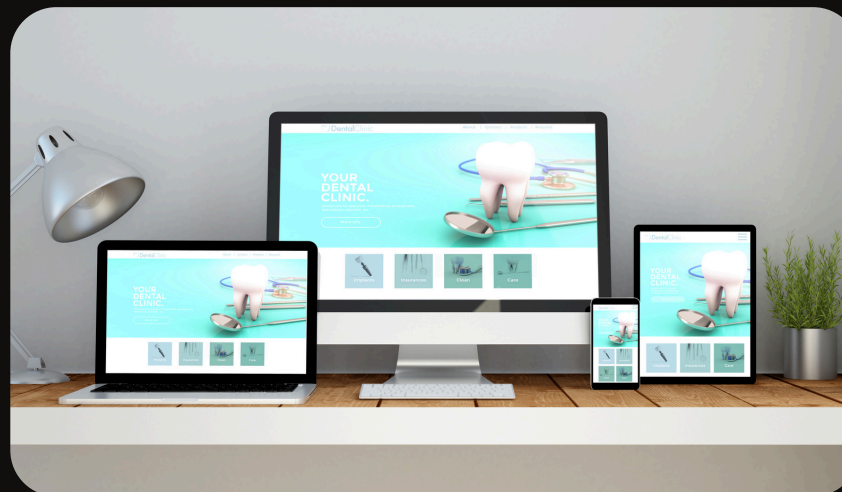
Social

No HFSS paid advertising allowed – including payed influencer campaigns.



Websites & Apps

No HFSS advertising allowed – even if it's not yours, you could be fined.



TV

HFSS advertising can only be broadcasted after the 9pm watershed.



THEN:

AN UPDATE.

- **THE DEADLINE HAS BEEN DELAYED.**

The new HFSS restrictions will now now come into place **until 1st Jan 2026**.

HOWEVER! Advertisers, broadcasters, and online platforms have pledged to follow the restrictions from 1st October 2025, as if they were already in effect.

- **“NEW” EXEMPTIONS APPLY.**

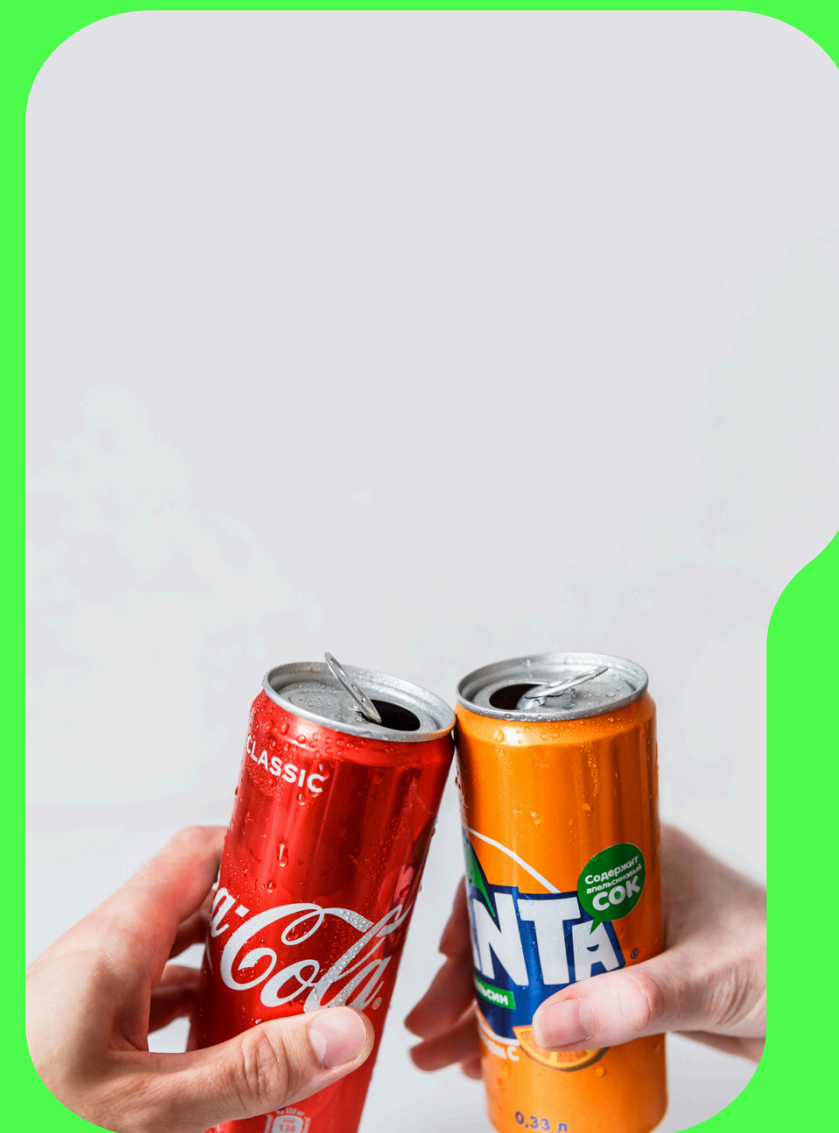
Except they’re not new exemptions – they’re the same exemptions just explained properly.

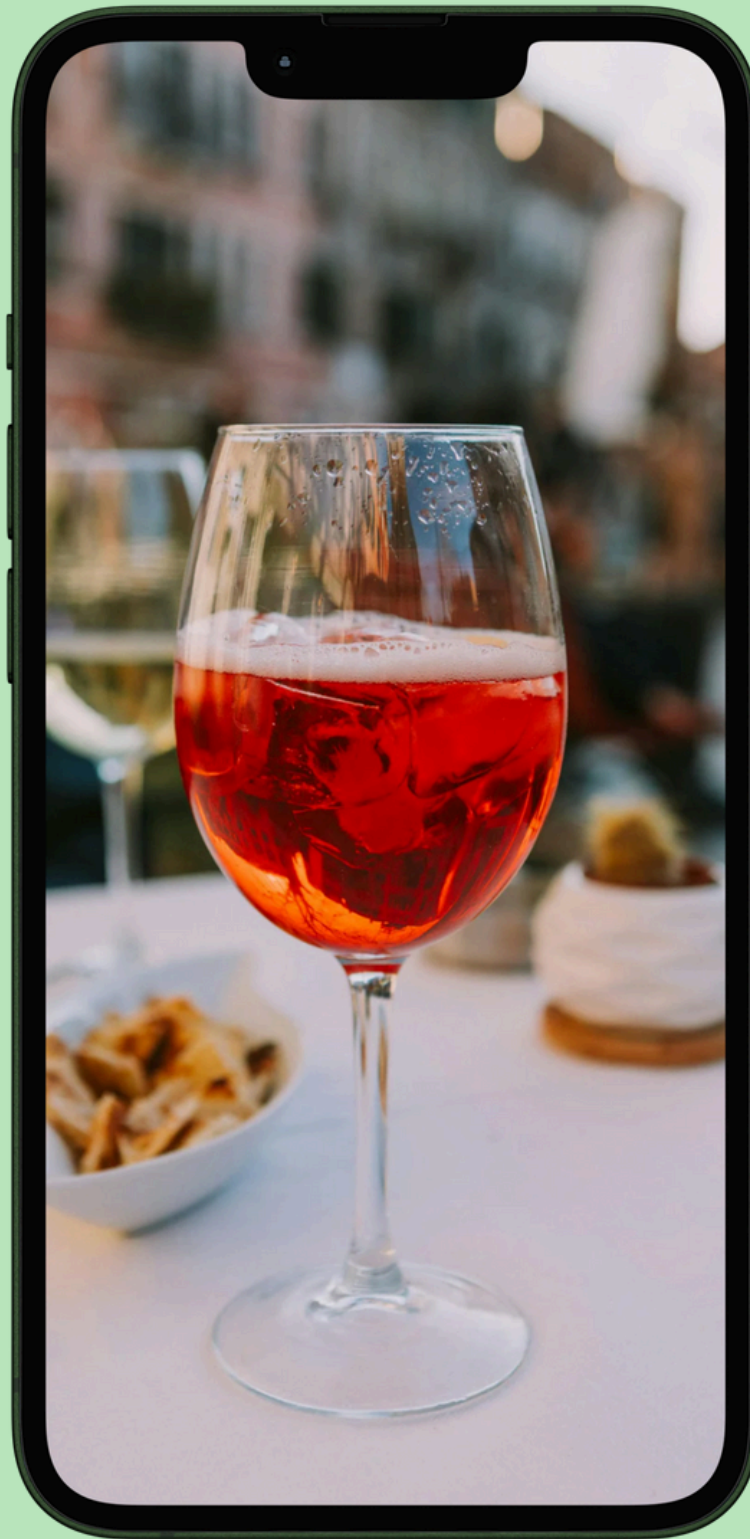
The government has introduced an amendment that states brand-only advertising does not count within the restrictions, provided the ads do not identify a specific HFSS product.

That basically means: no direct promotion of food or drink, just the brand name, logo, or general lifestyle imagery that doesn’t highlight any specific HFSS product.



WAYS AROUND IT





CUSTOMER PERSONA: DRINKS BRAND

example - organic marketing

Create content around the lifestyle and occasions that suit your drinks, or compile a video of pairing suggestions.

Collaborate with influencers on organic content where the product is part of a broader lifestyle story, not a direct product pitch.

example - paid advertising

Channel your ad spend into a city centre pop-up, where consumers can test your drinks in real life – and encourage them to create content themselves with a photo opportunity.

Tip: UGC content is your biggest ally here – you just can't pay for it.

CUSTOMER PERSONA: ONLINE BAKERY

Example - organic marketing

Share behind-the-scenes content showing the craft and care behind baking — the artistry, the local sourcing, the baker's story.

Example - paid advertising

Use ad spend to promote the brand story or upcoming pop-up events. Or consider sponsoring or presenting at local food festivals.

Tip: Recipe videos are proven to increase your saves.



CUSTOMER PERSONA: PIZZERIA

Example - organic marketing

Showcase recipe inspiration and community stories: how the dough is made, the origins of the ingredients, customer spotlights, or charity partnerships.

Run organic contests asking followers to share their favourite toppings or pizza memories.

Example - paid advertising

Run ads promoting the restaurant experience (ambience, customer reviews, special events) rather than pushing specific menu items.

OOH ads could highlight brand identity and values, such as family-friendly vibes or sustainability commitments



TO DO LIST:

Don't wait until your campaign is pulled or your credibility is questioned. **Get your HFSS ducks in a row now.**

1

Audit your Q4 plans – are you relying on paid food ads?

2

Reallocate budgets toward organic content strategy and influencer gifting (not paid).

3

Work on SEO-led, high-engagement content that drives clicks and time-on-page.



HOW PLATFORMS REWARD PERFORMANCE



META

Algorithms favour **time spent, shares, comments, and saves.**

That means captions that spark conversation, carousel posts, and calls-to-action that keep people scrolling, tapping, and sharing.

TikTok

It's all about **completion rates** and **replays.**

You've got three seconds to hook your viewer and convince them to stay.

Snappy, high-retention content is what wins here.

YouTube & Google

Click-through rates and **watch time** rule the roost.

That means optimised titles, engaging thumbnails, and deep-dive content that encourages binge-watching and boosts your search visibility.

PRIORITISE

ORGANIC CONTENT

With paid options off the table for many brands, the secret sauce is now engagement-focused organic content. It's not about chasing likes anymore — it's about how users interact with your posts.

THE METRICS THAT MATTER NOW:

- ✓ Page visits
- ✓ Link clicks
- ✓ Comments & shares
- ✓ Saves
- ✓ Watch time
- ✓ Return visits



These are the signals that push your content further — automatically. Think of it as feeding the algorithm the right fuel.

GET IN TOUCH

We **ENGAGE** and **CONNECT** audiences to build **COMMUNITIES** – and create newsworthy campaigns for newsworthy businesses.

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SOCIAL MEDIA

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WHO WE'VE DONE IT FOR



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