

Sponsorship & Donations

Version 3

Approved by: LTM Board

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Date of next review: January 2021

Policy owner: Assistant Director: Marketing & Development/Head of Development

1. Policy Abstract

London Transport Museum (LTM or the Museum) proactively pursues funding from the corporate sector, trusts, foundations, statutory and industry funders and from individuals to fund its charitable activity and extend its community and audience reach.

The Museum's Development team will establish relationships with those individuals or entities which have good reason to support the Museum, particularly, those who are willing and able to work collaboratively with the Museum in the long-term. This includes, but is not exclusive to, the transport industry and companies who do business with Transport for London (TfL).

The Museum's Sponsorship & Donations policy will help the Museum to decide who it will work with. The Museum is aware that the activities of some organisations may not be compatible with the Museum's mission and reputation. Before entering into a partnership or relationship, the Museum will assess any potential harm a partnership could have on London Transport Museum, Transport for London, Museum audiences and stakeholders.

2. Assessment criteria

London Transport Museum is registered with the Fundraising Regulator <https://www.fundraisingregulator.org.uk/directory?name=london+transport+museum>. The Museum's fundraising complies with the Fundraising Code of Practice and particular attention is paid to provisions 1.3-1.7 in relation to Requesting Donations, the Acceptance and Refusal of Donations, Rewards/ Incentives and benefits Packages, After Donation, Use of Funds, Complaints and Returning Donations. The Museum pays particular care to provision 1.3.2. Acceptance and Refusal of Donations:

a) The trustees (and their delegates) must act in the best interests of the charity when deciding to accept or refuse a particular donation.

Alongside consideration of the Fundraising Code of Practice, the decision on whether to develop a partnership or relationship will be based on the following criteria:

- *Brand alignment* – Is the relationship with a potential sponsor / donor consistent with our organisational values, mission and plan?
- *Reputational risk* – Could the sponsor / donor relationship bring either London Transport Museum or TfL into disrepute?
- *Nature and scale of risk* – What are the risks/likelihood of the risks, versus the potential benefits?
- *Funding need* - Does the relationship deliver on a real need for the organisation?
- *Value of the partnership* – What is the value of the partnership to London Transport Museum compared with the investment the Museum will need put in to secure and manage it. Will the partnership deliver value to the Museum in the long term?
- *Financial stability* – Are we confident that the sponsor/donor will honour the terms of the relationship, contractual and otherwise?

3. Process of assessment

We will look at each partner on a case by case basis to decide if there are potential issues in entering into a relationship. The Museum has a standard process, as follows:

- At the start of each fundraising campaign, the Development team will develop a fundraising strategy. As part of the 'prospect research phase' of strategy development, the team will assess the suitability of potential funding partners against the above assessment criteria. The findings of this research will be included in a Fundraising Strategy document. If research on prospects generates significant sensitivities, a potential funder will not be included on a 'prospect lead list'.

- Prospect research undertaken by the Museum is compliant with General Data Protection Regulation outlined in section 3 and the Privacy Notice displayed on the homepage of the Museum's website
- Occasionally, a funding opportunity will present itself outside of a formal fundraising campaign. In this scenario, we will follow the same research process and a potential relationship will be discussed, evaluated and approved by the below groups.
- Fundraising Strategy will be reviewed by the Assistant Director, Marketing & Development, who will undertake further research and consult with Senior Managers at the Museum and relevant stakeholders at TfL as necessary.
- The Strategy will then be tabled for discussion and approval at the Museum's monthly Fundraising meeting. This meeting is attended by the Development Team, Museum Director, Chairman of the London Transport Museum Friends and others as appropriate. The Committee will make the decision to do one of the following:
 - To pursue the relationship/s in the strategy.
 - To investigate a potential sponsor or donor further. In which case, the Marketing & Development team will report back to the Fundraising Committee Meeting with more information for consideration completing the 'Supporter Review' form, part of the Museum's suite of project management templates under the 01 Planning Stage of the project process. The form will be tabled and discussed at the Fundraising Committee meeting and the decision taken on whether the Museum should enter into a relationship to the Museum Board.
 - The process will also be invoked for all existing partners when a contractual agreement comes to an end and new contractual agreement is being negotiated in case the circumstances within that company have changed
 - A signed and scanned version will be saved within the Marketing & Development files on the Museum's L Drive

As a relationship develops, further security is provided:

- When the Museum agrees a sponsorship or donation (either financial or in kind) the Museum will develop a formal legal contract signed by both parties. This contract has been developed for the Museum by the TfL Legal team and is regularly reviewed. It protects the Museum and TfL throughout the relationship term and covers the following:
 - Sponsor benefits and a description of the relationship.
 - Sponsorship fees and payment schedule.
 - Intellectual property, licensing, use of name and logos.
 - Compliance with TfL policies.
 - Insurance and indemnity.
 - Criteria for termination.

- The relationship will be developed with a partner as described in the Fundraising Strategy and partnership plan.
- If, after entering into a contractual agreement with a partner or donor, the contract is breached, the contract may be terminated.

It is the responsibility of all staff, trustees and volunteers to ensure that these principles, criteria and internal procedures are adhered to.

4. General Data Protection Regulation and the use of Personal Information

Personal Information will be managed in line with the General Data Protection Regulation (GDPR) which replaces the Data Protection Act 1998 and becomes enforceable from 25 May 2018.

The information below provides a summary of the key ways in which the London Transport Museum (LTM) may use personal information.

a. How we collect personal information

The Museum may collect information in several different ways:

Most of the information we hold is provided directly by the donor, supporter or prospect. For example, they may give us their information in order to purchase a ticket or sign up for one of our events, request our newsletter, make a donation, or purchase something from our online shop. We will also collect information if a donor, supporter or prospect emails, phones or writes to us. If a donor, supporter or prospect telephones LTM, the call may also be recorded for training and quality purposes.

An individual may also have provided us with their information in another capacity such as an LTM Volunteer, Trustee, Patron or any other type of supporter or member.

Depending on their privacy settings, we may also collect information about a donor, supporter or prospect from their interactions on one of the Social Media platforms we use; for example if they post on our Facebook or Twitter pages or visit our YouTube channel.

If they are a member of the London Transport Museum Friends, the London Transport Museum Friends may also share personal information with us, when a member of the Friends has agreed they can do so.

On some occasions we may also collect publicly available information about a donor, supporter or prospect detailed in the sections below.

b. How we use personal information

LTM will use personal information in four main ways:

- To administer and fulfil a ticket order, online purchase or donation, including processing Gift Aid;
- To maintain an accurate record of an individual's relationship with us and to manage their contact preferences;
- To administer, operate and improve our events, exhibitions and fundraising activities; and;
- Where an individual has agreed, to send out information about the Museum

If an individual has agreed to receive our newsletter, we will send regular updates that will include information about the Museum's work, as well as our events, special offers and fundraising activities.

There are some membership and donation communications that we are required to send regardless of an individual's contact preferences. These are essential communications, deemed necessary to fulfil the Museum's contractual obligations to a donor or supporter. These may include Direct Debit confirmations and advanced notices, thank you letters, renewal of Membership cards and renewal reminders, Gift Aid confirmation letters and querying returned mail or bounced Direct Debit payments.

c. Supporter profiles and targeting communications

Sometimes we may combine personal information with information available from other publicly available sources.

We do this for a number of reasons; for example so that we can send better communications more likely to interest the donor or supporter - or to provide an improved Museum experience for our donors, supporters and visitors. It also helps us to build a better long-term relationship with all of the people who support us currently - or who may do so in the future. Importantly, it enables us to raise more funds, more quickly and so support the wide and varied work that takes place at London Transport Museum.

We may analyse geographic, demographic and other information relating to an individual and we may use additional information from third party sources when it is available. Such information is only compiled using publicly available information about an individual. Some examples of the resources we might use include:

- Royal Mail National Change of Address database (NCOA);
- BT Operator Services Information System (OSIS);
- WealthEngine, a wealth intelligence database;
- Reviewing employment information made publicly available via social media;
- Newspaper articles, publications and company websites;
- Companies House, Bordex and other company information databases;
- Charity Commission and Office of the Scottish Charity Regulator (OSCR) registers.

Occasionally LTM may use aggregated, depersonalised information to carry out other research and analysis. Examples may include looking at which geographic areas our visitors travel from, or which age groups visit us. Individuals cannot be identified using this data.

LTM does not undertake any profiling or make other decisions or assumptions about you based solely on the use of automated systems, databases or computer applications.

d. Sharing personal information

LTM has contracts with a number of third party service providers that support the day-to-day operation of the Museum, website, our fundraising activities and our shop.

Where we appoint an external supplier any such arrangements will be subject to a formal agreement between London Transport Museum and that organisation or individual to protect the security of personal information.

Where a donor explicitly agrees, we may share their personal information with the London Transport Museum Friends, a separate charity that works closely with the Museum to support its objectives and fundraising activities.

We will never pass a donor's personal information on to any other organisation for marketing purposes and do not sell or rent personal information to third parties for any purpose.

If a donor has made a Gift Aid declaration, we may disclose the information that the donor provided to HMRC for the purpose of reclaiming Gift Aid on their donation(s).

In some circumstances, disclosures of personal information to the police (and other law enforcement agencies) are permitted by data protection legislation, if they relate to the prevention or detection of crime and/or the apprehension or prosecution of offenders. Before any such disclosure takes place, the police are required to demonstrate that the personal information concerned is necessary for them to carry out a proper investigation. Each police request received by TfL is dealt with on a strictly case-by-case basis to ensure that any such disclosure is lawful and carried out in accordance with relevant guidance issued by the Information Commissioner's Office.

e. Length of time we keep information

The Museum will retain personal information in line with its data retention policy. This means that we will not hold information for longer than is necessary for the purpose we obtained it for.

To ensure that we do not retain inaccurate, out-of-date or irrelevant information, information will be regularly reviewed and we will delete anything that we no longer need.

f. Overseas processing

LTM and its service providers may process a donor's personal information in countries within the European Economic Area (EEA) and worldwide. These locations include the Netherlands and the USA. Any such processing will be carried out in strict accordance with UK and EU privacy legislation and the appropriate contractual safeguards which LTM has put in place.

g. Keeping information secure

We take the privacy of customers and supporters very seriously and a range of robust policies, processes and technical measures are in place to control and safeguard access to, and use of, the personal information we hold.

h. Information rights

If a donor would like to unsubscribe from our newsletters or other updates they receive from us, they can do so by using the link we include at the end of every email. They can also update their contact preferences at any time by contacting us at the address below.

Under data protection legislation a donor is entitled to ask to see any personal information that we hold about them and be given details of how we use that information, and where we obtained it from.

If a donor thinks that any of the personal information we hold about them is inaccurate, they can request that we correct it.

A donor also has the right, in certain circumstances, to require us to stop processing their personal information, or ask us to delete it.

In relation to all of a donor's information rights, please email us at enquiry@ltmuseum.co.uk or write to us at the address below:

London Transport Museum
Covent Garden Piazza
London
WC2E 7BB

We may require proof of identity and address before we can process a donor's request. We will respond to a request within the appropriate statutory timescales and in accordance with guidance from the Information Commissioner's Office.

If a donor has a specific concern or complaint about the way LTM handles their personal data, they can contact the Privacy and Data Protection team at Transport for London at privacy@tfl.gov.uk

A donor is also entitled to raise a concern with the Information Commissioner's Office, the UK's independent body set up to uphold information rights. More information about an individual's privacy and data protection rights can be found on their website at ico.org.uk

5. Freedom of Information Requests

The Freedom of Information Act 2000 provides a right to request access to all types of recorded information held by public authorities like Transport for London and its subsidiary companies including London Transport Museum.

From time to time the Museum receives requests for information related to London Transport Museum's business, operations and collections. Typically, requests seek information about: how collections are managed or recorded; how contracts for services are awarded; commercial activities; the value of sponsorships and contractual arrangements; details of sponsors use of venue hire, or use of other Museum facilities. Requests may explicitly cite FOI legislation, or simply ask a question which is categorised as a FOI request on receipt. Requests may be sent direct to the Museum or via Transport for London. Some are received via the WhatDoTheyKnow website <https://www.whatdotheyknow.com/> a site which helps anyone to submit requests to any authority.

Regardless of where a request is received or the subject matter, we follow a process agreed with the TfL Information Governance team when responding to all requests for information that are categorised as sensitive.

- Upon receipt, requests for information received at the Museum or TfL may be flagged as 'sensitive' and the Museum's Information Services Manager will be notified.
- The Information Services Manager liaises with TfL to formally log the request and notifies the relevant team manager in the Museum to draft a response.
- The Information Services Manager liaises with the Information Governance team at Transport for London to ensure a response to all requests are processed and sent within 20 working days.
- Responses to requests flagged as sensitive are added to TfL's sensitive report and must be signed off by the Museum Director and by TfL's Managing Director Customers, Communication and Technology before being sent.
- Since 1 January 2017, as part of TfL's commitment to transparency, all responses to FOI requests, including those relating to the Museum are published on TfL's Freedom of Information page <https://tfl.gov.uk/corporate/transparency/freedom-of-information>

Date of next review: January 2020