Name: KCLSU Advertising and Sponsorship Policy

Brief description: This policy is intended to give KCLSU and our student groups a guide to successful partnerships with external organisations, work in conjunction with KCLSU’S ethical checklist and enable staff to make appropriate day-to-day judgements on advertising/sponsorship activity.

1.0 Introduction

1.1 KCLSU (King’s College London Students’ Union) is a not for-profit organisation supporting over 27,000 students through their journey at Kings College London. This Advertising and Sponsorship Policy is intended to give KCLSU and our student groups a guide to successful partnerships with external organisations.

1.2 We see our relationships with external organisations, suppliers and providers of services – including advertising and sponsorship - as an opportunity to enhance the student experience, generate income and enhance KCLSU’S reputation as a top Students’ Union.

1.3 As part of our focus on being financially sustainable we are committed to driving income through advertising and sponsorship. To protect KCLSU’s reputation, brand and values, we have developed an Advertising and Sponsorship Policy.

1.4 This document sets out the types of advertising and sponsorship relationships that are appropriate for KCLSU and in keeping with our brand and values.

2.0 Scope

2.1 This document outlines a policy for the operation of advertising and sponsorship activity at KCLSU. The purpose of this policy is to:

- Protect KCLSU’S reputation, brand and values
- Ensure advertising and sponsorship is carried out in a transparent way
- Separate commercial advertising/sponsorship from editorial content
- Provide delegated authority from the Union’s Trustees to make day-to-day judgements on the appropriateness of advertisers and make agreements for advertising/sponsorship activity
- Where appropriate to work in conjunction with KCLSU’S ethical checklist which can be located here.

2.2 This policy applies to KCLSU and to all KCLSU student groups engaging in advertising and sponsorship activity, in print, online or in physical spaces across King’s College London campuses.

3.0 Compliance

3.1 The primary responsibility for ensuring advertising and sponsorship complies with these guidelines, and other regulations, rests with the Entertainments Development Manager and their team.
3.2 The Union’s Trustees have appointed the Deputy Chief Executive (as part of our Senior Leadership Team) to provide guidance and advice should the Entertainments Development Manager not be able to make a clear decision based on this policy. KCLSU’S Deputy Chief Executive is understood to provide guidance to the Entertainments Development Manager in protecting our reputation, brand and values.

3.3 Where a decision is likely to be controversial the case should be referred to the student life committee and ethics officer to ensure we remain politically accountable with the Ethics officer invited

3.4 If Student Council, AGM, SGM or a referenda pass a policy that requires the Advertising and Sponsorship policy to be amended, the changes will first be agreed by the trustee board and then the Advertising and Sponsorship policy will be amended accordingly.

3.5 At the end of each Academic year KCLSU will provide a report available to view online which lists who we have accepted sponsorship from and what activities this sponsorship relates to.

4.0 Principles

4.1 The following principles apply to all KCLSU student groups engaging in advertising and sponsorship activity (e.g. in print, on-line, and physical attributes across campus):

4.2 Advertising and sponsorship relationships must not jeopardise KCLSU’s reputation, brand or values.

4.3 All advertisements should be legal, decent, honest and truthful, as recommended by the Advertising Standards Authority (the UK’s independent regulator of advertising).

4.4 All advertisements must be socially responsible and prepared with a sense of responsibility to KCLSU’S students, and to the wider society, and should reflect the spirit, not merely the letter, of the policy.

4.5 Advertisements should:

- Be suitable for the target audience.
- Meet student expectations of KCLSU’S brand.
- Not bring KCLSU into disrepute, or give rise to doubts about KCLSU’S integrity, independence or impartiality.

4.6 As a charitable organisation it’s important that where possible advertisers share our values and positively contribute to KCLSU’S offer.

5.0 Reputation of the Union

5.1 Advertising or sponsorship arrangements must not influence KCLSU’S activities in such a way to impair the responsibility and independence of the Students’ Union.

5.2 All advertising must be clearly presented as commercial content, distinct from Union editorial content, and must not give the impression that it is Union content or part of Union activities.

5.3 The nature of the commercial relationship must always be transparent to the target audience and it must be clear to our students when they are seeing a commercial message. Surrpeitious or subliminal advertising is not permitted. Where content has been sponsored, this must be signalled clearly through use of a sponsorship credit.

5.4 KCLSU will not accept advertising from organisations that could damage existing commercial or operational partnerships.

5.5 Advertisements that receive a significant amount of negative member feedback or otherwise do not comply with this policy may be prohibited and removed at any stage. In all cases, KCLSU's existing complaints procedure must be used www.kclsu.org/policyzone/.

6.0 Prohibited categories of advertising
6.1 To protect KCLSU’s reputation, brand and values, the following categories of advertising are prohibited:

Religious advertising
- KCLSU does not believe it has the right to commercialise external religious or faith groups; this would include these groups carrying out activities such as running campus stalls, being promoted through digital media or at the annual Welcome Fair.

Advertising of pornography and sexual services
- This includes any advertisements relating to sex chat lines, pornography (such as films rated R18 by the British Board of Film Classification), escort agencies, sexually explicit publications and dating websites, and other sexual services.

Advertising of tobacco products
- This includes any advertisements relating to tobacco products, tobacco manufacturers and smoking accessories including lighters and e-cigarettes.

Advertising of weapons and gun clubs
- This policy does not cover the rights of our student groups to set up societies involving weapons, such as airsoft, paintball, and country pursuits such as clay pigeon shooting.

7.0 Specific Restrictions

7.1 To protect the KCLSU’s reputation, the following categories of advertiser or sponsor have specific restrictions or may require referrals.

7.2 Political advertising and advertising about controversial subjects

- This policy does not affect the rights of our student activity groups to set up political societies, however KCLSU must remain unbiased between political parties
- Advertising of lobby groups is unlikely to be accepted and only when there is no political or lobbying call to action and no implication of endorsement by KCLSU

7.3 Alcohol

7.3.1 Advertisements within the alcohol category must be socially responsible and must contain nothing that is likely to lead people to adopt unwise styles of drinking (for example, by encouraging excessive drinking). Care should be taken not to exploit the young, the immature or those who are mentally or socially vulnerable.

7.3.2 Advertisements within the alcohol category must be in line with KCLSU’S Responsible retail of alcohol policy and will not:

- Claim or imply that alcohol can enhance confidence or popularity.
- Imply that drinking alcohol is a key component of the success of a personal relationship or social event (the consumption of alcohol may be portrayed as sociable or thirst-quenching).
- Imply that alcohol might be indispensable or take priority in life or that drinking alcohol can overcome boredom, loneliness or other problems.
• Imply that alcohol has therapeutic qualities. Alcohol must not be portrayed as capable of changing mood, physical condition or behaviour or as a source of nourishment. Marketing communications must not imply that alcohol can enhance mental or physical capabilities; for example, by contributing to professional or sporting achievements.

• Link alcohol to illicit drugs.

• Feature alcohol being handled or served irresponsibly.

7.3.3 Drinking alcohol must not be portrayed as a challenge. Advertisements must neither show, imply, encourage nor refer to aggression or unruly, irresponsible or anti-social behaviour nor link alcohol with brave, tough or daring people or behaviour.

7.3.4 Advertisements within the alcohol category must neither link alcohol with seduction, sexual activity or sexual success, nor imply that alcohol can enhance attractiveness.

7.3.5 Advertisements that include a sales promotion featuring alcohol must not imply, condone or encourage excessive consumption.

7.3.6 Advertisements must not link alcohol with activities or locations in which drinking would be unsafe or unwise, such as the use of potentially dangerous machinery or driving.

7.3.7 Advertisements may feature sporting and other physical activities, but must not imply that those activities have been undertaken after the consumption of alcohol.

7.4 Betting, Gaming, Gambling, Casinos and Lotteries (BCGCL)

7.4.1 Advertisements in the BCGCL category must not mislead consumers by omitting material information, nor mislead by hiding material information, or presenting it in an unclear, unintelligible, ambiguous or untimely manner.

N.B. Material information is information that consumers need in context to make informed decisions about whether or how to buy a product or service. Whether the omission or presentation of material information is likely to mislead consumers depends on the context, the medium and, if the medium of the advertisement is constrained by time or space, the measures that the advertiser takes to make that information available to consumers by other means.

7.4.2 Advertisements in the BCGCL category must not:

• Portray, condone or encourage gambling that is socially irresponsible, or could lead to financial, social or emotional harm

• Exploit consumers’ susceptibilities, aspirations, credulity, inexperience or lack of knowledge

• Suggest peer pressure to gamble or disparage abstention

• Suggest gambling is a rite of passage

• Link gambling to seduction, sexual success or enhanced attractiveness

• Suggest that gambling can enhance personal qualities, for example, that it can improve self-image or self-esteem, or is a way to gain control, superiority, recognition or admiration

• Exploit cultural beliefs or traditions about gambling or luck

• Suggest that gambling can provide an escape from personal, professional or educational problems such as loneliness or depression

• Suggest that gambling can be a solution to financial concerns, an alternative to employment or a way to achieve financial security

• Portray gambling as indispensable or as taking priority in life, over (for example) family, friends or professional or educational commitments
• Condone or feature gambling in a working environment (the only exception is for licensed gambling premises)

• Suggest that solitary gambling is preferable to social gambling.

7.5 Financial Products and Services (FPS)

7.5.1 KCLSU believes that it should not actively engage in commercial partnership with companies that have received significant negative publicity for avoiding UK tax payments, although we may work together with companies who have made a commitment to improve their tax position.

7.5.2 Advertisements for financial products and services with a very high APR, such as ‘pay day’ loans will not normally be suitable for advertisement through KCLSU.

7.5.3 Offers of financial products must be set out in a way that allows them to be understood easily by the audience being addressed. Advertisers must ensure that they do not take advantage of consumers' inexperience or credulity.

7.5.4 Advertisements in the FPS category should state the nature of the contract being offered, any limitation, expense, penalty or charge and the terms for withdrawing from that contract. Alternatively, if a marketing communication is short or general in its content, free material explaining the offer must be made readily available to consumers before a binding contract is entered into.

7.5.5 The basis used to calculate any rate of interest, forecast or projection must be apparent immediately in all advertisements within this FPS category.

7.5.6 Advertisements in the FPS category must make clear that the value of investments is variable and, unless guaranteed, can go down as well as up. If the value of the investment is guaranteed, the advertisement must explain the guarantee.

8.0 Advertising practice

8.1 Further guidance on generally acceptable advertising practice is available in ‘the Code’ set out by Advertising Standards Authority to ensure compliance with national restrictions and marketing tactics: https://www.cap.org.uk/Advertising-Codes.aspx

Misleading advertising: https://www.cap.org.uk/Adverting-Codes/Non-Broadcast/Codeltem.aspx?cscid=61a03caa-6750-498d-8732-68d55c0752fd#VakMQk2252w

For further information, or advice on specific advertising or sponsorship activity, please contact:

Matt Fryer – Entertainments Development Manager

matt.fryer@kclsu.org

0207 848 1562