

Concern Worldwide (UK) Policy Vulnerable Donors Policy

1. Introduction

Concern Worldwide (UK) is committed to ensuring that our fundraisers, volunteers and external suppliers working with us to raise funds comply with all fundraising legislation, regulation and best practice.

We are committed to complying with the Fundraising Regulator Code of Fundraising Practice (<https://www.fundraisingregulator.org.uk/code-of-fundraising-practice/code-of-fundraising-practice-v1-4-310717-docx/>) and the Institute of Fundraising guidance document 'Treating Donors Fairly' guidance document (<http://www.institute-of-fundraising.org.uk/library/treatingdonorsfairly/>).

In particular our policy on dealing with vulnerable donors is informed by Section 1 of the Fundraising Regulator Code of Fundraising Practice (Key principles and behaviours), which states that:

- Fundraisers must take all reasonable steps to treat a donor fairly, enabling them to make an informed decision about any donation. This must include taking into account the needs of any potential donor who may be in a vulnerable circumstance or require additional care and support to make an informed decision.
- Fundraisers must not exploit the credulity, lack of knowledge, apparent need for care and support or vulnerable circumstance of any donor at any point in time.
- If a Fundraiser knows or has any reasonable grounds for believing that an individual lacks capacity to make a decision to donate, a donation must not be taken
- A donation given by someone who lacked capacity at the time of donating must be returned
- Fundraisers must not continue to ask an individual for support if they have reasonable grounds for believing, in the course of their engagement with the individual, that they are in vulnerable circumstances which mean they are unable to make an informed decision to donate.

2. Policy statement

Concern Worldwide donors and supporters play a pivotal role in our work tackling hunger among some of the world's poorest people. We are committed to ensuring that supporting Concern is a highly positive experience for everyone, both existing and potential new supporters.

As part of that commitment, we recognise that Concern has a clear obligation to protect those lacking the capacity to make an informed choice about supporting the charity and those in vulnerable circumstances. We are committed to ensuring that any individual or agency representing Concern meets this obligation at all times.

We also recognise that, in reaching out to existing and potential new donors to explain our work and ask for support, for example when conducting activities such as direct dialogue or telephone fundraising, it is inevitable that from time to time our fundraisers will come into contact with people lacking capacity to make an informed decision or people in vulnerable circumstances. In such cases, whenever a fundraiser suspects that a person may be vulnerable, our policy is that the fundraiser should end the approach politely and sensitively without making a request for a donation and without making any direct enquiries about the individual's capacity to make a decision or the existence of vulnerable circumstances. This approach applies in all fundraising activities, both those managed in-house and those conducted through external agencies.

Concern recognises that in some cases it may be difficult for fundraisers to make a clear cut decision as to whether or not someone is in a vulnerable circumstance or has capacity to make an informed decision. The fundraiser is unlikely to know the person, the interaction may not last long and may be over the phone. In situations where there is a doubt, our policy is to err on the side of caution and to end the contact politely and respectfully. In such cases, fundraisers may provide additional written information or refer donors to Concern's website, so they are able to make their own decision in a more considered fashion and without the presence of a Concern fundraiser.

Concern is committed to helping our fundraisers comply with this policy and so has developed specific guidelines to help fundraisers deal appropriately with vulnerable donors and members of the public (See Appendix). Every fundraiser employed by the charity will receive a copy of this policy as part of their induction and be given appropriate training to ensure it is understood.

3. Who this policy applies to

A range of Concern UK staff, volunteers and representatives may come into contact with the public in the course of their work and therefore may come into contact with people in vulnerable circumstances. This policy applies to all of the following:

- All office based staff, including those in the Fundraising, Supporter Care, Finance, Communications and Policy and Campaign teams
- Our in-house street fundraiser and door to door teams
- Volunteers based in our offices, those involved with local volunteer Concern groups, volunteers in Concern UK shops and any volunteer fundraiser representing Concern.
- External direct dialogue and telemarketing fundraising agencies that Concern may appoint from time to time to fundraise on our behalf

4. Working with external agencies

Concern requires all agencies working on our behalf to comply with this policy. Where agencies have their own policy for dealing with vulnerable donors, we will review it before the signing of contracts to ensure that the agency's approach and standards are consistent with our own. We will also require that the Fundraising Regulator Code of Fundraising practice is complied with at all times and include this requirement in any contract.

5. Returning donations made by vulnerable people

Despite our efforts to protect those in vulnerable circumstances, we recognise that occasionally Concern may receive a donation where there is a doubt over the donor's mental capacity to make that decision. In line with the Fundraising Regulator Code of Practice, in such situations Concern may return the donation to the donor or in certain circumstances to a family member or designated person. In all cases, we will need to be satisfied that at the time the donation was made the donor was unable to understand the consequences of making the donation.