

Safeguarding Vulnerable Supporters Policy

1.0 INTRODUCTION

At EACH, we rely on voluntary donations for the majority of our income and depend on donors to fund our work - without our supporters we would not be able to deliver our services to families across Cambridgeshire, Essex, Norfolk and Suffolk. Our fundraisers, retail staff and volunteers connect with our supporters through a variety of channels including mail, email, phone, SMS, face to face meetings, in shops and at events.

Fundraising should be a positive experience for all, whether an existing donor or potential new supporter. By following the high standards set by the Fundraising Regulator across all our fundraising activities, we want to ensure that the relationship with our donors is strong.

Every donor is an individual with a unique background, experiences and circumstances – and every interaction between a fundraiser and donor is different.

EACH does not identify vulnerable adults based on broad personal characteristics such as disability or age. We believe that everyone should have the opportunity to donate if they are willing and able to do so, and that denying people the chance to give based on appearance, age or behaviour may be considered discriminatory. However, EACH recognise there are times when donations should not be taken or where a donor needs additional care and support to make an informed decision.

There will also be times when fundraisers and retail staff come into contact with people who may not have the mental capacity to make a decision to donate. Contact can happen either through our own communications or through communications from the agencies who work on our behalf.

If a fundraiser or member of retail staff reasonably believes that an individual is unable to make a decision then they should not accept a donation from that person. If the donation has already been made, and at the time of donating the individual lacked capacity (and EACH receives evidence of this) then the donation will be returned.

2.0 OBJECTIVES

To ensure that people in vulnerable circumstances are protected in the course of our work to fundraise and generate income.

3.0 ROLES AND RESPONSIBILITIES

All members of staff, including volunteers, must be aware of the policy and the actions to be taken if they come into contact with a potential donor who they suspect might be in vulnerable circumstances. If in doubt, they should refer to a member of the fundraising / retail team before accepting the gift.

Line Managers of fundraisers or retail staff have a responsibility for ensuring that staff are aware of and fully understand this policy. They must assess whether staff are able to make correct decisions on their own initiative and seek support from their line manager when appropriate.

4.0 MANAGING DONORS

EACH abides by the Fundraising Regulator's Code of Fundraising Practice. The General Principles clause 1.2 e) state that:

- i) "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. ii) 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." iii) "If a fundraiser knows or has reasonable grounds for believing that an individual lacks capacity to make a decision to donate, a donation MUST NOT be taken. iv) A donation given by someone who lacked capacity at the time of donating MUST be returned."

We recognise that it may be difficult in some situations for fundraisers or other members of staff to make a clear decision as to whether or not someone is in a vulnerable circumstance or lacks capacity. The person is likely to be a stranger to the member of staff, the interaction can be short-lived and may not be in person.

The following key points, taken from the Institute of Fundraising's 2016 guidance on "Treating Donors Fairly", will help staff as they decide how to respond appropriately:

"Respect – Always be respectful. This means being mindful of and sensitive to any particular need that a donor may have. It also means striving to respect the wishes and preferences of the donor.

Fairness – Treat your donors fairly. This includes not discriminating against any group or individual based on their appearance or health conditions.

Responsive – Respond appropriately to the individual needs of your donors. The responsibility lies with fundraisers to adapt their approach (tone, language, communication technique) to suit the needs and requirements of the donor.

Accountable – Take responsibility for your actions, ensuring that your fundraising is carried out in line with the Code of Fundraising Practice. Consider what processes and procedures your charity may need in place to ensure this happens and that the needs of people in vulnerable circumstances are met.”

5.0 TYPES OF VULNERABILITY

By vulnerability we mean those people who may need additional care and support, or may be in a vulnerable circumstance, when making a decision to donate.

All individuals may, at some stage in their life, be in a vulnerable circumstance or require additional care and support. At EACH we recognise the broad range of issues which may impact upon someone’s ability to make a decision to donate, and that those circumstances may be either permanent or temporary. For further information and guidance please refer to the procedure for Identifying and Managing Vulnerable Supporters (MF08a).

EACH does not actively seek donations from young people under 18. If a donor is under 18, permission must be sought from the appropriate responsible adult who will hold overall responsibility for the donation/s and the communication with the charity.

Older people – particularly those over 60 – constitute a significant section of our donor base, and many are indeed very active and fully able to make decisions. Equally, younger donors may find themselves in a vulnerable position. EACH will therefore not use age as a factor in determining whether a person is vulnerable or not, which could be considered to be discriminatory. Instead, when communicating or fundraising with someone who is older, members of staff should take reasonable steps to ensure that they understand the information and donation. Staff should be aware of signs that may indicate that the individual needs additional care and support to make an informed decision and take appropriate steps to meet that need.

In addition to age, there may be overlap in the above indicators and the requirements of the Mental Capacity Act 2005. The important distinction is whether the individual has a lack of capacity to make a decision, or needs more information and support to be able to make a decision to donate. Staff need to be

aware of this difference so that they can make a reasoned judgment and act appropriately when dealing with existing or potential donors. People in vulnerable circumstances can still have the capacity to donate, but may need additional support.

6.0 TRAINING AND COMPETENCY

All new fundraising staff will read and discuss this policy with their line manager as part of their induction on appointment. Line managers will highlight and discuss with existing fundraising staff during 1:1 meetings.

7.0 EQUALITY & DIVERSITY STATEMENT

EACH will ensure that the contents of this document are applied in a fair and reasonable manner that does not discriminate on the grounds of any protected characteristic as defined by the Equality Act 2010.