

# Vulnerable Supporters Policy

## Policy purpose

We think it's important to have a vulnerable persons policy as part of Cambridge Rape Crisis Centre's (CRCC) commitment to open, honest and respectful fundraising. This policy outlines how we identify potential vulnerabilities, the measures we have in place to protect supporters in these circumstances and the actions we will take.

This policy applies to all staff, volunteers, trustees and anyone acting on behalf of or in partnership with CRCC.

## Introduction

Our supporters are incredibly important to us, helping us to ensure that no survivor of sexual violence in Cambridgeshire has to cope alone. CRCC is committed to making sure that our interactions with new and existing supporters are in line with our values and that people are treated fairly and appropriately. This is especially important when supporters demonstrate vulnerable circumstances.

Four key principles underpin our approach:

**Being 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.

**Being responsive:** as fundraisers we will be ready to adapt our approach and be flexible to meet the needs of individuals. It also means being prepared to ask questions or take additional steps when necessary.

**Being fair:** we will not make decisions based solely on particular characteristics, such as a person's appearance, the way they talk, any medical condition, or disability. Fairness means responding to people as individuals.

**Being accountable:** we will take responsibility for our actions, ensuring we work in line with the Code of Fundraising Practice.

Our policy is informed by the Chartered Institute of Fundraising's guidance document '[Treating Donors Fairly](#)'. This document is a specific set of guidance for fundraisers responding to the needs of people in vulnerable circumstances and helping donors make informed decisions.

CRCC is registered with the Fundraising Regulator. We are committed to upholding the [Fundraising Regulator's Code of Practice](#) and to our Fundraising Promise.

## The Code of Fundraising Practice

CRCC will always abide by the Code of Fundraising Practice relating to Vulnerable People.

In particular, we will take all reasonable steps to treat a donor fairly, enabling them to make an informed decision about any donation. We will take into account the needs of any possible donor who may be in vulnerable circumstances or need extra care and support to make an informed decision.

We will never exploit the trust, lack of knowledge, apparent need for care and support or vulnerable circumstance of any donor at any time.

## Capacity to make a decision

Different situations and factors can affect an individual's capacity to make a decision regarding donating. CRCC will communicate with supporters on the assumption that they possess the full capacity to make financial decisions unless we have reason to believe otherwise.

A supporter may experience some or all of the following circumstances:

- A diagnosed condition such as dementia or schizophrenia
- A person facing times of stress or anxiety (e.g. following a recent bereavement or redundancy)
- An undiagnosed or temporary mental health condition (such as severe anxiety)
- Learning difficulties
- Difficulty understanding the language
- Being under the influence of alcohol or drugs

Please note that this is not an exhaustive list. We will look for indicators that could show a supporter needs extra care and support or may be in a vulnerable situation through our verbal and written communication with them. We may identify them using the following channels:

- A supporter informs us that they need extra care and support around decision making and are in a vulnerable situation.
- A family member, carer or person acting on a supporter's behalf informs us that they need extra care and support around decision making and are in a vulnerable situation.
- If we suspect that a supporter may be in vulnerable circumstances even though we have not explicitly been informed.

Each fundraising encounter is unique. CRCC recognises that it can be very difficult for either our people or third parties to accurately identify all signs of vulnerability, some of which can be subtle. However, while an accurate identification of vulnerability may be difficult, all individuals are required to put the needs of the supporter first during any interaction and assess whether they are able to make an informed decision to donate.

In addition, the following examples may help identify vulnerable supporters:

- Request for repetition or to speak more slowly
- Evidence of being confused i.e. replying 'yes' or 'no' to a question that requires a more detailed answer, going off on a tangent and talking about irrelevant and unrelated things
- Repeating themselves
- Becoming upset during the conversation
- Explaining that a relative/friend deals with their finances/personal affairs
- Explains there is a language barrier and they don't understand
- Repeatedly asking who they are talking to
- Inability to read and understand the information they are provided with, and continually asking for it to be repeated
- Talking about personal issues and asking for advice
- Explicitly stating that they are or they feel vulnerable
- Saying they are not well or not in the mood to continue or displaying signs of ill-health
- Indicating in any way they are feeling rushed, flustered or stressed by the situation

## Our responsibilities

If we have sufficient reason to believe that a supporter is in a vulnerable situation and does not possess the required capacity to make a financial decision regarding their donation, we will immediately remove the supporter from all fundraising communications (electronic and physical) sent by CRCC until given notice to do otherwise.

The supporter will also be removed from administrative communications that do not impact them directly, and any other unnecessary data processing. We will ensure that our database records this information as soon as possible and we will confirm and communicate this change to the relevant parties (the supporter, a family member, carer or Power of Attorney.)

We recognise that it may be difficult in some situations to decide whether or not someone is in a vulnerable circumstance or lacks capacity, but if we suspect that a person may be in vulnerable circumstances we will end the conversation immediately and politely, without:

- making a request for a donation
- asking about the individual's capacity to make a decision or the existence of vulnerable circumstances

When dealing with supporters via telephone, we follow guidance provided by the Direct Marketing Association (DMA).

If we become aware of a situation where a third-party agency acting on our behalf has not acted in accordance with this policy, we may stop working with the agency or ask that individual fundraisers responsible for non-compliance with the policy be removed from our campaigns.

### **We will not process a donation if we believe that an individual lacks the capacity to make a decision regarding the donation.**

If we process a donation and receive information or evidence after processing that the person was in a vulnerable circumstance and lacked the capacity required to make a decision about donating, we will refund the donation and confirm this refund in writing.

If the donor has made a request to cancel a donation (e.g. someone who donated whilst temporarily lacking capacity) we will ensure that any regular donation is terminated and confirm this termination in writing.

All decisions relating to refunding or refusing donation will be made in accordance with our Accepting and Refusing Donations Policy.

## Our response

We will always endeavour to do the following with an individual who we have identified/has been identified as someone who requires additional care and support or is in a vulnerable situation:

- Be patient and calm, take time to understand the context and circumstances the individual is in, even if this prolongs the conversation.
- Check how the individual would like to communicate and offer alternatives that give supporters more time to take in the information being provided e.g. offer to send further details in the post/via email.
- Ask the individual if they need more time or if they need to talk to someone else before making a decision regarding a donation.

- Repeat information.
- Provide alternative formats of fundraising materials (different languages, accessible formats).
- Throughout the interaction, check the individual’s understanding of the information they have provided and what they have agreed to – for example by asking them to repeat this information back to us or by sending a further confirmation in writing before proceeding to process anything.
- Talk clearly, avoiding words and phrases that may be hard to understand (but avoid shouting).

These steps will help us to ensure that the individual involved is safe-guarded and is provided with the necessary time and tools to make an informed decision, if they are able to do so.

## Family members/carers/attorney acting on an individual’s behalf

If CRCC is contacted by a family member, carer or attorney regarding an individual who they believe or know to be in a vulnerable circumstance, we will ask to see documentation before we carry out actions requested on that individual’s behalf to evidence that they have authority to act on behalf of the individual.

If, for example, they are concerned about a person who is receiving requests for financial support, we will act upon this, asking what kind of communication, if any, is acceptable. Our database will then be updated to reflect their wishes.

## Other indicators of vulnerability

Age will not be treated as an indicator of vulnerability for an individual. CRCC does not discriminate against a person due to their age. We will take care when communicating with older supporters and ensure that we are conscious of other indicators that may indicate an individual’s need for additional support or position in a vulnerable circumstance.

The only instance where we will immediately cease marketing communications with a supporter based on age is if we identify them as being under the age of 18, at which point we will immediately stop them from receiving fundraising communications. The exception to this is if we are approached by a young person who has undertaken community fundraising for us; we will thank them and communicate with them about their support. We will also make a note that they are under 18 on our database and will ask for written permission from their parent or guardian for their fundraising prior to their fundraising starting.

### Policy Version: Version 2

This policy was ratified by the Board of Trustees on the 6 December 2022.

This policy was last reviewed (NAA/CB) on the 9 May 2024.

This policy will be next reviewed by the 9 May 2027.

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