

Vulnerable Customer Policy

1. Statement

1.1 Fundraising should be a positive experience for all, whether an existing or potential new supporter. We recognise that we must balance the opportunities for all to support charitable contributions with direct recognition to the equality act whilst considering the unique and individual circumstances each person may have that could affect decision making. Vulnerability may take many forms and so extra care and consideration to possible ramifications and ability to rationalise decision making should be considered as far as possible and practicable.

This group referenced above may include, but are not restricted to:

Any prospect whose first language is not English, who is elderly, who has a visible or declared disability, who has a suspected mental health diagnosis which may impact on decision making at the time of contact, who is under the influence of alcohol, drugs or other mind altering substances that may include the misuse of prescribed medications, a person with a learning disability unable to clearly demonstrate through their interaction the required level of understanding to support any decision making, a person who appears to be experiencing cognitive impairment such as a dementia or indeed any other health or physical related issue which may impair clear and measured judgement.

1.2 All individuals may, at some stage in their life, be in a vulnerable circumstance or require additional care and support. The purpose of this policy is to ensure that the operations of Unique Fundraising Ltd do not have any negative impact upon vulnerable consumers. For the purposes of this policy vulnerable consumers are sponsors/ supporters and prospective sponsors/ supporters whose ability or circumstances require us to take extra precautions in the way that we sell and provide our services in order to ensure that they are not disadvantaged in any way.

2. Scope

2.1 This policy is to provide all staff/ contractors with guidance to ensure full awareness of the policy & procedures in place in respect of how to identify and deal with vulnerable adults.

2.2 All staff and contractors are expected to comply with this policy at all times; to meet the standards and abide by the Institute of Fundraising document - ***‘Treating Donors Fairly – Fundraising with People in Vulnerable Circumstances’ Guidance for Fundraisers: Responding to the needs of people in vulnerable circumstances and helping donors make informed decisions.*** Compliance with ***The Compliance Directorate Rule Book – Private Site Fundraising, Rule Fr3: Managing vulnerability*** must also be met.

2.3 Any employee/ contractor who breaches this policy will be dealt with under the Contract for Services Agreement, (for self-employed contractors)/ Contract of Employment and Disciplinary Procedure (for employees), and, in serious cases, may result in the termination of a contract.

3. Considerations for Covid-19

3.1 Some people may have pre-existing medical conditions which render them more vulnerable to the dangers of Covid-19 infection. Fundraising staff should identify where possible and be aware of people who fall into vulnerable and extremely vulnerable categories so they can ensure that they are given adequate protection and support to enable them to comply with government health recommendations in respect of Covid-19. Full details are covered in the Covid-19 – Fundraising Risk Assessment.

3.2 Fundraisers should also be vigilant when speaking with and responding to people vulnerable from the effects of Covid-19. This may be; general anxiety, financial due to losing employment or income, emotionally due to personal illness with Covid-19 or illness or the loss of family/ friends.

4. Financial Vulnerability - Self-Exclusion – Procedure

4.1 A self-exclusion request may come directly to a fundraiser whilst on site/ in venue, through a welcome call made by a member of the verification team, or from a phone call made by a member of the public to the Unique Fundraising office.

4.2 If a member of the public has indicated that they would like to discuss self-exclusion from participation in gambling, arrangements will be made for them to either speak to the HR/ Compliance Manager at Unique Fundraising as soon as possible, or the contact details for **begambleaware** will be given.

If the member of the public has proceeded with a sign up, a note will be made by the fundraiser to flag as vulnerable and followed up with a call from the HR/ Compliance Manager to discuss their circumstances.

4.3 If a member of the public discloses gambling concerns or is certain that they wish to self-exclude the fundraiser will not sign them up for any lottery products and will direct them for advice/ to self-exclude through;

<https://www.begambleaware.org/self-exclusion>

Tel: 0808 8020 133

4.4 *Should a member of the public sign up and later disclose gambling concerns through a welcome call or through a call to the office, they will be flagged as vulnerable. This would be followed up by a call from the HR/ Compliance Manager who would discuss their situation, cancel the sign up if deemed appropriate and direct them to **begambleaware** for further support. A record of this would be kept by the HR/ Compliance Department.*

5. Responsibility for implementation of the policy

5.1 The HR/ Compliance Manager is responsible for monitoring and reviewing the operation of this policy and making recommendations for changes to minimise risks to the Company. We reserve the right to amend this policy as appropriate at any time, and that any amendments will be notified to you.

5.2 All staff/ contractors are responsible for their own compliance within this policy and for ensuring that it is consistently applied. All staff/contractors should ensure that they take the time to read and understand it. Any breach of the policy should be reported to their immediate manager.

6. Training & Compliance

6.1 The following training will be conducted in accordance with the Institute of Fundraising guidance 'Treating Donors Fairly' document. Training will incorporate an awareness of 'Indicators which could mean that an individual is in a vulnerable circumstance or needs additional support'. All fundraisers will be informed of the procedure for dealing with vulnerable customers detailed in Paragraph 5:

Induction/ Compliance Training –

- Training will be initially conducted during Induction/Compliance Training.
- Re-training will be conducted at least annually; in particular on return to work post the Covid-19 pandemic.
- This policy document will be read and signed as understood.
- A Compliance Test will be taken and must be passed to allow a fundraiser to provide their services to the company as a fundraiser.

Refresher/ Compliance Training –

- Regular refresher/ compliance training will be conducted at Head Office as deemed necessary. This includes group training or one-to-one sessions which may be deemed necessary, for example; following a complaint, an anomaly picked up during the verification process, a mystery shop.
- Refresher training will be conducted with Managers/ CTSOs at regular periodic meetings as deemed necessary.

Compliance Checks –

- Compliance and understanding of this policy will be checked during fundraisers' one-on-one visits by Managers, and further training will be given when a need is identified.
- Verification calls – any anomalies raised during this process will be flagged up to the HR/ Compliance Manager and addressed accordingly.
- Mystery Shops – will be conducted by Unique Fundraising, the charity client and the IoF to check compliance.
- The IoF's 'Treating Donors Fairly' Guidance and The Compliance Directorate Rule Book- Private Site Fundraising have been uploaded to the iPad. These documents must be read and understood by all fundraisers and referred to as deemed necessary. A test of both documents will be conducted and passed on a 6 monthly basis to allow a fundraiser to continue providing their services.
- This Policy will be re-circulated at least annually, when any amendments are made, and as deemed necessary by the HR/ Compliance Manager.

7. Procedure for Dealing with vulnerable customers

Examples of People in vulnerable circumstances

The following is a non-exhaustive list of examples of people in vulnerable circumstances:

- Whose first language is not English

- Elderly (over the Age of 70)
- Has a visible physical disability
- Has a suspected mental disability
- Who is under the influence of alcohol or drugs
- Who is Incoherent or appears senile
- Has learning difficulties
- Who is experience a time of stress or anxiety (e.g. bereavement, redundancy, Covid-19)
- Financial vulnerability (where supporting the charity may impact on their ability to sufficiently care for themselves or leave them in financial hardship)
- Who has dementia or Alzheimer's or any health-related disadvantage that could be deemed to affect their judgement
- Covid-19 Pandemic – see para.3

Head Office will be notified of any customer who is signed up deemed and potentially in the people in vulnerable circumstances bracket above. Action to be taken as follows;

- The fundraiser will record a note on the iPad of the details and circumstances of the sign up with confirmation that the sign up has been completed iaw IoF's guidance.
 - A note will be made for the sign up for every supporter aged 70 years or over to allow processing via the iPad. This note is to flag any vulnerable circumstances and confirm the supporter's suitability to sign up iaw this policy and the IoF's guidance. The fundraiser must check that the supporter fully understands the details of the sign up and is happy to support.
 - A member of the verification team will make a welcome call and the HR/ Compliance Manager will be notified of the details/ outcome. The call will be listened to and a full compliance check conducted.
 - Any special requests at the verification call will be passed on to the client
- Any sign-ups deemed not to be compliant will result in the cancellation, and any breaches this policy will be dealt with i.a.w. Para 2.3.
 - The iPad will not allow any supporter under the age of eighteen to be signed up for a Direct Debit. Fundraisers will direct anyone under the age of 18 to the charity directly to donate should they wish.
 - At the request of the Charity Client or HR/ Compliance Manager, any individuals deemed vulnerable will be notified to IT and their bank details will be blocked to stop them signing up again. In the event of such an individual signing up, their sign up will go into 'pending' and will be notified to IT. The charity client will then be notified of the incident by the HR/ Compliance Manager.
 - We will maintain a record of all supporters identified as vulnerable, and cancellations will be notified to the charity client.

- We will monitor our complaints procedure to identify any trends.

8. Review

This policy is reviewed at least annually by the HR/ Compliance Manager and updated as required.