

# Fundraising: Vulnerable Supporters Policy

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## 1. Policy Overview

We recognise that every donor is an individual with a unique background, experience, and circumstance, and every interaction between NMITE and our supporters is different.

Inevitably, a few of the people we engage with through our fundraising activities may be classed as temporarily or permanently vulnerable, or lack the mental capacity to make an informed decision about making a donation. This Policy outlines the steps we will take to safeguard these individuals.

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

### 1. Defining vulnerable supporters

We make the distinction between an individual lacking the capacity to make a decision (legislated through the Mental Capacity Act) and someone who has the capacity to make a decision but may be vulnerable at that moment in time.

We recognise that it can be difficult to make a clear cut decision as to whether or not someone falls into one of the above categories. We do not identify vulnerable supporters based on specific personal characteristics like age or disability but on a case by case basis. We encourage our team to take a precautionary approach and use their best judgment.

Below is a (non-exhaustive) list of indicators or behaviours which could signal that someone may be in a vulnerable circumstance or lack capacity.

*Indicators of individuals who are in vulnerable circumstances or lack mental capacity to make a decision could include:*

- Financial vulnerability (where a gift from a donor may impact on their ability to sufficiently care for themselves or leave them in financial hardship);
- Times of stress or anxiety (e.g., bereavement, redundancy);
- A long-term or temporary disability or limiting illness;
- A long-term or temporary mental health condition;
- Influence of alcohol or drugs.

*Behaviours of individuals who lack mental capacity to make a decision may include:*

- Asking irrelevant and unrelated questions;
- Responding in an irrational way to simple questions;
- Asking for questions or information to be continually repeated;
- Taking a long time or displaying difficulty in responding to simple questions or requests for information;
- Displaying signs of confusion and forgetfulness;
- Indicating in any way that they are feeling rushed, flustered, or experiencing a stressful situation.

## **2. Responding to the needs of vulnerable people**

How we respond to the needs of an individual depends on the nature of the conversation we are having with them. We will be responsive to their needs and adapt our approach to suit those needs and the context. We will take special care to be especially compassionate and respectful in our conversations with them.

For example, we can:

- Talk in clear language, avoiding words and phrases that may be hard to understand;
- Repeat information and check understanding;
- Be patient;
- Provide alternative formats of fundraising materials (different language, accessible formats);

- Ask if the individual would prefer to be contacted in a different way (email, letter) and offer to contact them at a different time.

### **3. Accepting and refusing gifts from potentially vulnerable people**

We will not accept a donation if we know, or have good reason to believe, that a person lacks capacity to make a decision to donate, or is in vulnerable circumstances which means they may not be able to make an informed decision.

If we suspect that an individual who is making a donation may be in a vulnerable circumstance or unable to make an informed decision, we will take the following steps:

- Check and confirm that the individual does want, and is able, to make the donation;
- Ask if they would like to have some more time to make a decision and/or to talk to anybody else before making a decision;
- If they are in financial difficulty but still want to support NMITE, we will suggest other ways that they can get involved and make a difference

If we have good reason to believe that the individual is not in a position to make a donation we will gently close the conversation. In some cases it may be necessary to take the donation details and then re-assess the case with the Head of Fundraising before deciding whether to accept the donation.

### **4. Returning donations given by vulnerable supporters**

Despite the safeguards we put in place to protect vulnerable supporters, we acknowledge that there may be occasions where concerns are raised about a donor's mental capacity to have made an informed decision about a past donation. In these circumstances we will sensitively investigate the concerns. If we come to believe that the donor was not in a position to make an informed decision about the gift, we will return it.

If someone with power of attorney for the donor informs us that, at the time of donating, the individual concerned was not able to make an informed decision, we will return the gift.

### **5. Requests by third parties in relation to vulnerable supporters**

Sometimes a third party, for example a family member, may contact NMITE on behalf of a vulnerable donor to communicate a request in relation to their gift, for example cancelling a Direct Debit. In these cases we must be satisfied that the third party making the request is entitled to act on behalf of the individual. This should be demonstrated through a written authority on behalf of the donor, or through power of attorney.

All requests on behalf of vulnerable supporters in relation to their donations should be put in writing. Requests should be addressed to the Head of Development and Fundraising, along with details of the concerns and appropriate evidence of the relationship.

You can contact us by

Email: fundraising@nmite.ac.uk  
Post: Head of Development and Fundraising  
NMITE  
Blackfriars Street  
Hereford  
HR4 9HS

Requests will be reviewed on a case by case basis. We will aim to respond to requests within 20 working days. If further investigation is needed then we will communicate with you to inform you of the estimated timescale.

## **6. Ensuring we do not approach vulnerable supporters for future gifts**

If a supporter is found to be vulnerable or lack capacity, for example if the individual concerned chooses to disclose this information or if we are informed about their circumstances by a verified third party, we will update their communication preferences on our records to ensure that donations are not solicited from them in the future.

We recognise that an individual who may need extra support or may be vulnerable at one point in time may not be in that position later on in their life. On these occasions we may choose to pause communications temporarily until the individual concerned is no longer in a vulnerable position. If appropriate we may ask them when they would like us to resume future communications. When contacting them in the future, we will take care to ensure that they are content to be contacted and we will be alert for any signs of potential vulnerability.

## **7. Privacy and confidentiality**

We will not record sensitive information about a supporter's circumstances unless they have explicitly given us permission to do so. We will only record the information that is necessary to justify why we have refused or returned a gift, and why the supporter should not be approached for a gift in future. If a request comes from a third party, we will record the details of the person making the request, their relationship with the

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|-------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| <b>Author of Policy</b>                                           | <i>Jen Newton</i>                                                                                                       |
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| <b>Amendment Dates</b>                                            | <i>05/07/2023</i><br><i>15/07/2025</i>                                                                                  |
| <b>Reason for update</b>                                          | <i>Institutional annual policy update</i>                                                                               |
| <b>Date for next review</b>                                       | <i>01/08/2027</i>                                                                                                       |
| <b>Related Policies, Procedures, Guidance, Forms or Templates</b> | <a href="#">The Fundraising Regulator's Code of Fundraising Practice</a><br><a href="#">CIOF Treating Donors Fairly</a> |
| <b>Policies superseded by this Policy</b>                         | <i>V3</i>                                                                                                               |

| Summary of changes made to this version                        | <i>updated role title</i> |
|----------------------------------------------------------------|---------------------------|
| donor, the request and the outcome against the donor's record. |                           |