External Vulnerable Circumstances Policy

As fundraisers we aim to help individual supporters feel connected to the people benefitting from the CARE projects they support. We do this through a variety of communication channels including mail, email, SMS, telephone, live chat and, from time to time, in person.

As a charity we protect the dignity of vulnerable people living in poor communities overseas and this protection of dignity applies to our supporters who choose to donate or raise funds for CARE.

CARE recognises that some people who wish to support us will be in vulnerable circumstances in the context of how we interact with them. This can be due to several factors outlined in this document. As a charity, CARE has a duty and obligation to make sure that all our dealings are consistent with our values which include helping others thrive by nurturing their differences, strengths and potential and that we make reasonable adjustments and put in place appropriate support mechanisms to make sure members of the public/supporters are not being disadvantaged by us.

Our guiding principles

We are members of the Fundraising Standards Board and this is what we promise our supporters:

- We will always **respect your privacy**; if you prefer not to be contacted by certain methods please let us know.
- We will always **protect your data**; we will not sell your personal details to any other organisation.
- We have a **supporter care team** who are dedicated to you. We always love to hear from you.
- We will **share stories** of how your support is helping to change lives for the better.
- We will be **honest** with you. If we face challenges or make a mistake, we will let you know; we are always learning.
- We are **accountable** to the people we reach through your support.

The IoF Code of Practice

We always abide by the Institute of Fundraising Code of Practice. The general principles state:

“You must 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”

"You must not exploit the trust, lack of knowledge, apparent need for care and support or vulnerable circumstance of any donor at any time"

"You must not take a donation if you know, or have good reason to believe, that a person lacks capacity to make a decision to donate, or is in vulnerable circumstances which mean they may not be able to make an informed decision"

Vulnerable contacts

If, based on our interaction with a supporter, we have reason to assume that additional support may be required or that they are in a vulnerable circumstance, we will adapt the manner of our communication in response. This may include:

- being patient and not rushing the conversation so avoiding making the person agitated or confused
- offering to contact the individual in a different way so that they have additional time to make a decision, if indeed they have the capacity to do so
- checking the person's understanding, for example by asking them to repeat back information to us
- asking the person if they need to speak with anyone else before deciding
- asking if they would prefer another method of communication e.g. offer to have some information sent in the post, via email or SMS, so they have time to take in the information.

If it is reasonably believed that a supporter is unable to make a decision or is in a position which does not allow them to make a donation, then a donation is not to be taken or accepted.

In the case of donations received via SMS, if a number is identified as having multiple responses/ interactions then CARE will contact the supporter and, if deemed appropriate, the donations will be refunded.

Types of vulnerable circumstances

Vulnerable circumstances can be permanent or temporary and may include people with a diagnosed physical or mental health condition, learning difficulties, people with an undiagnosed condition such as severe anxiety or depression and people with literacy issues or problems understanding English. Circumstances may also include domestic issues,

alcohol and drugs dependency, unemployment, financial vulnerability from bankruptcy. Furthermore, some people may feel vulnerable due to a recent event, such as bereavement, divorce, redundancy etc.

When communicating with a supporter, it should be considered if they are:

- able to follow and understand the discussion taking place.
- able to weigh up the information, ask rational questions or probe for appropriate details
- able to retain the information you are giving them; can they recall details or are you having to repeat?
- able to express, explain or communicate their decisions.

All the above will help to make sure that the individual comes first and give them time to make an informed decision.

Where an individual is in permanent vulnerable circumstances where they are unable to make any informed decisions, we will flag their record on our database as “Do not contact” and they will not be contacted again.

In the case of permanent vulnerable circumstances due to physical disability such as hearing loss or sight loss, such persons still have the capacity to choose to donate to a charity. We will discuss how we can help them to continue their support by offering alternative communication methods such as printing in large font or by sending written information or ensuring that any telephone communication is clear with no background noise.

In the case of temporary vulnerable circumstances, such persons still have capacity to choose to donate to a charity. However, it is the context and circumstance they may be in at the time of deciding about whether to donate that is relevant. CARE should delay accepting a donation until the supporter has had time to consider it and a “cooling off” period should be given so that the supporter can change his or her mind or give them a chance to get advice from family/friends.

Other ways of finding out a supporter is in vulnerable circumstances

We can at times identify vulnerable adults through communications:

1. A supporter who has emailed or written to us to tell us they are in permanently vulnerable circumstances
2. Handwriting is shaky or difficult to read (indicating frailty)?
3. Unreasonable anger – this can indicate underlying anxiety and stress
4. Displaying signs of forgetfulness

5. Continually asking for things to be repeated
6. Taking a long time to answer simple questions
7. Repeating simple questions such as ‘who are you’, ‘what charity is it’, ‘what do you want’
8. Asking irrelevant/unrelated questions
9. Irrational answers to simple questions
10. Straying off the subject and making unrelated statements
11. Indicating they are feeling rushed, flustered, stressed or exasperated by the situation
12. Unable to read/understand information
13. Displaying signs of ill-health
14. Saying they are not well and do not want to continue
15. Not remembering relevant information about the charity if they already support
16. Repetitive yes/no answers to questions
17. With special regard to donations received via **SMS**, signs that a person maybe vulnerable are:

    ● Repeated donations to the same campaign keyword, indicating that they do not understand the mechanism or what the process is or have not understood that the donation has been successful.

    ● Setting up multiple subscriptions to one charity in response to multiple campaigns, perhaps unaware that they already have a subscription.

    ● Setting up subscriptions to multiple charities.
18. If a third party has indicated the supporter is in vulnerable circumstances. In this situation:
    - CARE will take steps to verify the authority of that person to act up on the individual’s behalf e.g. Power of Attorney or Legal Deputy authorisation. If these documents are provided, we will accept their instruction from that authority regarding termination of commitments, refund of donations, removal from mailing lists or other communication preferences updates.
    - If the third party is a family member or friend but without a legal authority to act on behalf of the person in vulnerable circumstances, CARE will make efforts to gain consent from the person in vulnerable circumstances for the family member or friend to act upon their behalf. This could be over the phone or in writing.
    - If we are unable to ascertain consent from the person in vulnerable circumstances for the family member or friend to act upon their behalf, we will proceed with actions based upon our judgement of what is in the best interest of the supporter.

Our database will be updated to reflect the supporter's wishes.

DO WE USE AGE AS AN INDICATOR OF VULNERABLE CIRCUMSTANCES?

No. Age does not indicate whether a person is vulnerable or not. There are many older people who are active and leading comfortable lifestyles, so we cannot make a judgement based on age. However, reasonable steps should be taken to ensure that information is understood. Equally a much younger supporter could be in vulnerable circumstances. Vulnerability needs to be assessed on the person's circumstances.

If a supporter is identified as being **under the age of 16**, then they will be removed from fundraising appeals and calls.

STAFF TRAINING

Training is provided for staff and fundraisers when they begin working for CARE and checks are carried out to ensure the guidelines are being adhered to.

Any supporters with disabilities are encouraged to contact the Supporter Care Team to discuss how we can help them to support the work of CARE International UK. You can contact the team by emailing supportercare@careinternational.org or telephoning 0207 091 6100. In addition, you can write to us at CARE International UK, c/o Ashurst LLP, London Fruit & Wool Exchange, 1 Duval Square, London, E1 6PW