HEADINGTON RYE
OXFORD

Fundraising with and Responding to People in Vulnerable Circumstances Policy

Reviewed by:	The Bursar
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Policy on fundraising with and responding to people in vulnerable circumstances

Fundraising should be a positive experience for everyone. Making a gift to Headington Rye Oxford is an important way that our donors can show support for issues and institutions that they care deeply about. Our fundraising efforts seek to establish and develop relationships with the Headington Rye community around the world. The support of both existing donors and potential new supporters is crucial to the School's continuing success.

Headington Rye Oxford recognises that some of the people we engage with through our fundraising activity may be in a vulnerable circumstance, or may need additional support to make a decision. This policy sets out guidance for anyone involved in fundraising for the School. For the purposes of this document, the term 'fundraiser' refers to anyone engaged in any form of fundraising activity for Headington Rye Oxford, whether in-house or a third party.

Sector Guidance

The Fundraising Regulator's Code of Fundraising practice states that:

- 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.

- 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.

Headington Rye Oxford's approach is informed by the Institute of Fundraising's 'Treating Donors Fairly' Guidance: https://ciof.org.uk/IoF/media/IOF/Header%20images/Treating-donors-fairly.pdf?ext=.pdf

Headington Rye Oxford's approach

Fundraisers for Headington Rye Oxford should respond to the needs of each individual donor, which will depend on the nature of the interaction and engagement. In all circumstances, Headington Rye Oxford expects those fundraising on its behalf to be alert to people who may be in a vulnerable circumstance and to treat those individuals with respect and care.

If the fundraiser has reasonable grounds for believing that a potential supporter lacks the capacity to make a decision, then a solicitation should not be made, nor should a donation be accepted.

If, after receiving a donation, Headington Rye Oxford receives evidence that the supporter lacked capacity to make the decision to donate, then the donation must be returned. Headington Rye Oxford will follow the guidance from the Institute of Fundraising and the Charity Commission in these cases.

If a fundraiser believes that an individual may be in a vulnerable circumstance or unable to make an informed decision, the fundraiser should politely end the interaction in such a way as to not cause distress. When ending fundraising activity, if there is the opportunity to do so, the fundraiser should check the individual's preferences as to whether they would like to be contacted again in the future.

If a donor is found to be lacking capacity to make a decision, Headington Rye Oxford will put into place measures to ensure that donations are not solicited from them in the future. This will likely involve recording communication preferences in the Raiser's Edge database. When recording information, all fundraisers must be aware of their responsibilities under the Data Protection Act. Under no circumstances should fundraisers record any judgement or assessment about what they perceive an individual's physical or mental condition to be.

If an individual voluntarily provides a written or verbal 'personal declaration' about their condition or circumstances, then provided that they have consented for Headington Rye Oxford to hold this data, it can be recorded on the database. In all such circumstances, guidance should be sought from the Privacy and Compliance Officer to confirm our compliance with our data protection obligations.

Sometimes a third party (e.g. a family member) may contact Headington Rye Oxford on behalf of a donor to communicate a request. For any financial matter, the School must be satisfied that the third party making the request is entitled to act on behalf of the individual. This is usually demonstrated through a written authority on behalf of the donor, or a power of attorney for the third party to administer the donor's affairs. It is the third party's responsibility to provide evidence of this entitlement. For some requests (for example, around communication preferences), the third party may not have such written authority, but provided that Headington Rye Oxford is satisfied that the individual is acting in the best interest of the supporter we will respond to these requests.