Policy For Payroll Giving Fundraising Communications with Vulnerable People 2026

Introduction

To ensure that we take all reasonable care to protect vulnerable adults, Payroll Giving in Action Ltd complies with the Institute of Fundraising guidance set out in the document called "Treating Donors Fairly: Responding To The Needs Of People In Vulnerable Circumstances And Helping Donors Make Informed Decisions". Payroll Giving in Action Ltd requires its staff and any contractors contacting "employees within the workplace" on our behalf, to comply with guidelines provided by the Association of Payroll Giving Organisations, the Chartered Institute of Fundraising and the Fundraising Regulator.

Every donor is an individual with a unique background, experiences and circumstances – and every interaction between a fundraiser and donor is different. Payroll Giving in Action Ltd does not identify vulnerable adults based on broad personal characteristics such as disability or age. We believe that everyone should have the opportunity to donate if they are willing and able to do so, and that denying people the chance to give based on appearance, age or behaviour may be considered discriminatory.

It is inevitable that we will encounter people who are vulnerable and not able to make informed decisions about their giving. This document outlines how we take all reasonable care to identify employees who may be vulnerable, and what action we take if we suspect a person is vulnerable.

Complying with regulation and best practice

The Chartered Institute of Fundraising General Principles clause 1.2 e) 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 considering the needs of any potential donor who may be in a vulnerable circumstance or require additional care and support to make an informed decision. ii) 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."

Payroll Giving in Action Ltd fundraising abides by the four key principles of the Institute of Fundraising's "Treating Donors Fairly" policy, which are:

Respect – treating all members of the public respectfully. 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, whatever they may be.

Fairness – all donors should be treated fairly. This includes not discriminating against any group or individual based on their appearance or any personal characteristic.

Responsive – this means responding appropriately to the different needs that a donor may have. The onus should be on the fundraiser to adapt his or her approach (tone, language, communication technique) to suit the needs and requirements of the donor.

Accountable – it is up to fundraisers and charities to take responsibility and care to ensure that their fundraising is happening to a high standard.

Identifying vulnerable people

By 'a vulnerable adult', we mean those people who are lacking the ability, either temporarily or permanently, to make an informed decision about donating money through Payroll Giving in Action Ltd to any UK charity. There are several factors which can contribute to vulnerability. Examples of indicators which could mean that an individual is in a vulnerable circumstance or needs additional support could include:

- Mental illness and mental capacity concerns (both permanent and temporary conditions), including dementia and personality disorders
- Significant physical illness
- Physical and sensory disability
- Learning difficulties
- Times of stress or anxiety (e.g. bereavement, redundancy)
- Financial vulnerability (where a gift from a donor may impact on their ability to sufficiently care for themselves or leave them in financial hardship)
- Language barriers
- Influence of alcohol or drugs
- Where people live (for example, in supported housing).

It is not feasible to provide a comprehensive set of factors or characteristics which would enable fundraisers to always identify an individual who is in vulnerable circumstances. We therefore follow the guidance on indicators of vulnerability, laid down by the Institute of Fundraising. This guidance includes:

Indicators that an individual appears confused, such as:

- Asking irrelevant and unrelated questions
- Responding in an irrational way to questions
- Saying 'yes' or 'no' at times when it is clear they haven't understood the meaning of what is being discussed.

Indicators that the individual may have physical difficulties, such as:

- Unable to hear and understand what is being said.
- Unable to read and understand the information they are provided with.
- Displaying signs of ill-health like breathlessness or signs of exasperation or discontent.

Indicative statements that suggest a lack of mental capacity, such as:

- Saying 'I don't usually do things like this, my husband/wife son/daughter takes care of it for me.'
- Having trouble remembering relevant information, for example forgetting that they are already a regular donor to that charity (e.g. have an existing Direct Debit) or have recently donated.

What we do if we suspect a supporter is vulnerable

We follow the Institute of Fundraising guidance if we suspect that a donor lacks the capacity to decide about the donation which states that "a donation should not be taken.

What should we do if a potentially vulnerable person wishes to sign a donor form?

Interaction with vulnerable people may be unavoidable, especially as it is not always immediately obvious what a person's situation is. How fundraisers respond to the needs of an individual will depend on the nature of the interaction and engagement. Fundraisers should be responsive to the needs of an individual and adapt his or her approach to suit those needs and the context.

Examples of how a fundraiser can respond to the needs of an individual:

- Talk in clear language, avoiding words and phrases that may be hard to understand (but avoid shouting).
- Repeat information.
- Try to reflect the terminology used by the donor which may help to increase/speed up their understanding.
- Be patient and do not rush the individual.
- Provide alternative formats of fundraising materials (different language, accessible formats).
- Be upfront and tell the person why you are communicating with them and check they are happy to continue.
- Ask if they would prefer to be contacted in a different form (email, letter) and offer to contact them at a different time.
- Ask if they would like to talk to anybody else before deciding.
- Check their understanding at relevant parts.
- Check with a supervisor of HR manager if they are available.

Ending contact

Based on your assessment of the situation, it may be necessary to end the interaction. When doing this, care must be taken not to cause offense or upset. Examples of ways to end a verbal or email conversation include:

- 'I've taken up enough of your time today, thank you for listening.'
- 'Maybe you would like to take some more time to consider whether you'd like to support us?'
- 'You're welcome to contact us at your convenience to discuss this further...'

Terminating the interaction could depend on whether the individual's vulnerability is judged to be a permanent or temporary situation.

What should we do if we are contacted by a family member or carer?

If a donor – or a family member with power of attorney – contacts to say that a donation was made by someone unable to make an informed choice, then we can (and should) cancel the donation. It may also be appropriate to mark this person on our database as 'do not contact'.

However, if the contact is made by a third party - such as a family member, without power of attorney - we need to be satisfied that the request is being made on behalf of the donor. The onus here falls to the third party to provide evidence that they have the right to represent the donor.

We should, of course, remain sensitive to the fact the donor may be going through a permanent or temporary change in circumstances that may be quite stressful to the third party.

In all situations, the outcome and the preferences recorded should be followed up with a written confirmation to the donor.

All Payroll Giving in Action Ltd fundraisers are required to sign Page 10 of the Training Book.

Signed: