

Vulnerable People Policy

Introduction

As part of our commitment to protecting freshwater ecosystems, and the people that depend on them for their wellbeing, we are also committed to working with, and including the public. We know that contributing toward a cause you are passionate about should be a positive, and rewarding experience, everyone has the right to donate if they wish to and are able to do so, and we aim to ensure this is always the case.

Sometimes, circumstances can arise where it may be difficult for fundraisers to know whether or not someone is in a vulnerable circumstance or lacks capacity to make decisions in line with their best interests. We provide guidelines for fundraisers, but the foundation of our approach is to always be aware and conscious of the potential vulnerabilities of others, and protect their best interests.

Our policy on fundraising and vulnerable people applies to all fundraising conducted by, or on behalf of Freshwater Life Project, whether by our employees and volunteers, or through a third party or agency. It applies to all types of fundraising, be it face to face, over the phone, in written or in digital formats.

We adhere to the Code of Fundraising Practice, and this Vulnerable People policy is informed by the Code, and the Institute of Fundraising's Treating Donors Fairly: Fundraising with People in Vulnerable Circumstances guidance.

What is a vulnerable person?

We recognise that some of the people we engage with through our fundraising activities will not always have the capacity or be in the circumstances to fully understand the nature of the donation they are being asked to make to Freshwater Life Project, or the consequences of making that donation.

There are two different types of circumstances where we can judge someone to be vulnerable:

- If someone does not have the capacity of mind to make a decision in line with their best interests
- If someone is in vulnerable circumstances

It is important to recognise the difference between these in order to judge whether someone lacks the capacity to make a decision, or needs more information and support to be able to make a decision to donate. Fundraisers need to be aware of this difference so that they can make a reasoned judgment and act appropriately when communicating with existing or potential supporters.

Recognising a vulnerable person

A person in either circumstance described above, who finds it difficult to immediately make an informed decision about the choices offered to them is called a 'vulnerable person'.

A vulnerable person may be:

- Someone with a diagnosed condition such as dementia
- Someone going through a time of stress or anxiety, e.g. a recent bereavement, redundancy
- Someone with an undiagnosed or temporary mental health condition such as severe anxiety
- Someone with a severe physical illness
- Someone with learning difficulties
- Someone who has difficulty understanding the language
- Someone who is homeless
- Someone who is experiencing financial vulnerability

Our obligation to protect vulnerable people

We obligate ourselves at Freshwater Life Project to protect vulnerable people when fundraising. This includes respecting a vulnerable person's desire to make a donation unless they lack the mental capacity to make this decision. Whenever we suspect that someone we are engaging with is a vulnerable person, we will take steps to end the interaction with them in a way that seeks to:

- Protect that person's wellbeing
- Protect their dignity
- Note any desire they have expressed to support our cause

Fundraising and vulnerable supporters

If we think that someone does not have the mental capacity to make a decision in line with their best interests, we will not take a donation from this person. If we later find this to be the case, we will return any donation made. We will not contact this person to ask for donations in the future and will make sure a record is in place so that if they contact us in future we are able to respond appropriately.

If someone is in vulnerable circumstances, this person may still have the mental capacity to choose to make a donation but may need additional support or additional time to help them make their decision. If somebody discloses to us that they are in a vulnerable circumstance, we will engage with them as an individual to ascertain what support they may need and to ensure that they understand the financial decision they are making. We will consult them about their contact preferences and what forms of communication they are comfortable receiving. With their consent, we will make a note of what they have told us on their supporter record, so that we can better support them with future donations and reaffirm their preferences.



If a fundraiser working for Freshwater Life Project thinks that a person they are talking to may be vulnerable but does have the capacity to decide to donate, they will:

- Ask questions to help affirm the person's understanding of the donation they are making, and the consequences of making that donation
- They will do this without asking about the person's personal circumstances
- If appropriate, give the person additional time to make a decision and arrange to contact them again in the future to see if they would still like to make the donation

We recognise that sometimes it can be difficult for fundraisers to assess the vulnerability of a supporter, and in cases where a fundraiser is unsure, they are advised that they must seek a second opinion from a senior member of staff and obtain approval to accept any donation.

Third parties

We may be alerted to a supporter being vulnerable by a family member or carer. This is assessed on a case by case basis as we need to ensure we comply with data protection laws as well as acting to protect the vulnerable person in question. Where we are given information we will act upon this and our database will be updated to reflect this. We cannot disclose any information to the family or carer in regards to the supporter unless they have power of attorney.

Any agencies fundraising on our behalf, e.g. telephone or face-to-face fundraising agencies, are provided with our Vulnerable People Policy. Any fundraising undertaken by third parties is monitored on a regular basis by Freshwater Life Project.

Signposting and providing advice to people in vulnerable circumstances

It will sometimes be appropriate to signpost vulnerable people to a service or charity that might help them, e.g. by passing on a phone number or website address. Fundraisers will be made aware of relevant information they can signpost people to.