



Fundraising with Vulnerable People and Children and Young People (CYP) Policy

Introduction

It is inevitable that fundraisers will encounter people who may be in a vulnerable circumstance or need additional support to make an informed decision. There will also be times when our fundraisers inadvertently approach people who may not have the mental capacity to make a decision to donate. It is also possible that on occasion the SNAPS team may come into contact with individuals under 18 who wish to fundraise for us. This document outlines how we can take all reasonable care to identify supporters who may be vulnerable, or under 18 and what action we can take.

SNAPS has a responsibility to ensure employees and volunteers take all reasonable care to protect vulnerable adults and individuals under 18. SNAPS 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” as well as the following codes of fundraising practice;

- Fundraising involving Children
- Children and Data Protection

Every donor is an individual with a unique background, experiences and circumstances – and every interaction between a fundraiser and donor is different. SNAPS 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 is considered discriminatory.

Complying with regulation and best practice

The Fundraising regulator states:

5.1.1. You must make sure that fundraising activities are age-appropriate.

5.1.2. You must only contact children on school premises if you have the approval of a relevant member of staff.

5.1.3. You must get appropriate permission before taking or publishing photographs of children.



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5.2.1. You must have clear procedures in place to make sure fundraisers are aware of their safeguarding responsibilities towards themselves, potential donors and one another.

5.2.2. You must not, at any time, take advantage of the trust, lack of knowledge, apparent need for care and support, or vulnerable circumstances of an existing or potential donor.

5.2.3. You must give appropriate consideration to the needs of existing or potential donors who may be in vulnerable circumstances or need extra care and support to make an informed decision. This includes:

- not accepting a donation if you know, or have reason to believe, that a person cannot make an informed decision to donate; and
- returning a donation if you discover that the donor could not make an informed decision at the time of the donation.

5.2.3. You must take all reasonable steps to avoid asking for regular donations (for example, by direct debit) from anyone aged under 18.

SNAPS' fundraising team must always adhere to the above.

SNAPS' fundraising employees must also abide by the four key principles of the Chartered Institute of Fundraising's "Treating Donors Fairly" policy, which are:

- Being respectful - This means being mindful of and sensitive to any need that a donor may have. It also means striving to respect the wishes and preferences of the donor.
- Being responsive - Fundraisers need to be ready to adapt their approach and be flexible to meet the needs of individuals. It also means being prepared to ask questions or take additional steps when necessary.
- Being fair - Fundraisers should not make decisions based solely on a particular characteristic such as a person's appearance, the way they talk, any medical condition, or disability. Fairness means responding to people as individuals.
- Being Accountable - Fundraisers should take responsibility for their actions, ensuring that their work is carried out in line with the [Code of Fundraising Practice](#).

Identifying vulnerable people

Who is a vulnerable adult?

A vulnerable adult is any person aged 18 years or over who is, or may be, unable to take care of him or herself or who is unable to protect him or herself against significant harm or exploitation. With regards to fundraising, when we



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refer to a vulnerable adult we specifically refer to those people who are lacking the ability, either temporarily or permanently, to make an informed decision about donating money to SNAPS.

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, however, below are a list of indicators or triggers which could signal that someone may be in a vulnerable circumstance or lack capacity:

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

Written Communications

We can at times identify vulnerable adults through written communications:



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- A supporter who has emailed or written to us to tell us they are permanently vulnerable (see earlier definitions)
- Letters we receive from people where their thoughts and wishes are not clear or consistent.

Family Members/Carers

We may also be alerted to a supporter being vulnerable by a family member or carer. Where we are given this information, we must work with the supporter and their family member/carers if appropriate/depending on circumstances) to update the individual's communication preferences and record these on the individual's Beacon record. Ensuring these preferences are always adhered to.

Examples of how a fundraiser can respond to the needs of an individual who may be vulnerable include:

- 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 making a decision
- Check their understanding at relevant parts of the interaction and ask if there is anything that needs further explanation

Appropriate Actions if Someone is Identified as Vulnerable

Should a SNAPS employee or volunteer identify an individual as vulnerable or lacks the capacity to make a decision about their donation the donation must not be accepted (in accordance with the Fundraising Regulator's guidance). If after a donation is taken SNAPS receives evidence that the person lacked capacity to make the decision to donate, then the fundraiser should inform the Head of Fundraising and arrangements should be made to return the donation because the original donation was invalid.



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For a donation to be refused, or returned, SNAPS must be reasonably satisfied that the damage caused by accepting the donation will outweigh the cash benefits. This should be judged on a case-by-case basis at the discretion of the Head of Fundraising.

If it is felt that there is a moral obligation to return a donation then there is scope for the Charity Commission to authorise a charity to refund a donation (section 106 Charities Act 2011). Further guidance is available from the Charity Commission.

Should a donor be identified as vulnerable this should be marked on their Beacon record and actions taken to ensure this individual is not solicited for any future donations.

Consent and Capacity

Fundraisers must ensure that individuals have the capacity to give informed consent before accepting donations.

Where there is doubt about a person's capacity, fundraisers must not proceed with the donation and should refer to safeguarding protocols.

Identifying an Individual Under 18

It is the responsibility of all employees and volunteers working on behalf of SNAPS to ensure every effort is made not to solicit donations from under 18s. If a team member is in any doubt about an individual's age they must ask for proof.

An applicant's date of birth will be requested on all printed registration forms and on the website. Should face to face sales be active the applicant's date of birth should be requested, and SNAPS representatives reserve the right to request evidence of age/ a valid ID at their discretion.

Should a transaction take place over the phone, the applicant's date of birth will be requested and if the representative is in any doubt the individual they are speaking to is under 18, they may ask the individual to provide ID.

If in doubt employees will take all reasonable steps to verify a person's age and if this is not possible SNAPS reserve the right to refuse to engage in fundraising activity and to store an individual's data.

Supporting an Individual Under 18/Child or Young Person (CYP)

When a CYP wishes to fundraise for SNAPS, parental consent must be gained for their fundraising to go ahead. If they telephone or email to enquire



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about fundraising, parent or guardian contact details should be requested to gain consent.

SNAPS should not store the fundraising/marketing data of anyone under the age of 16 without explicit consent from a parent or guardian. A signed copy of consent should be saved and linked to the relevant Enthuse record. (It is noted that CYP data is stored on Charity Log for the purposes of accessing SNAPS services.)

There will be instances in which the age of a young person may only come to light further down the line. For example, if they set up an online fundraising page, we may not be aware of their age until contact has been made. At which point, individuals should complete a fundraising registration form including their DOB which the fundraising team should check upon receipt and, if they are under 16, the process for parental consent outlined above must occur.

Meetings

Any meetings with individuals under 18 should only be arranged once parental/guardian consent is received. Where possible, a parent or guardian should be present for the meeting. If this isn't possible, all meetings should take place in a public space and, if possible, two employees should be present.

When Under 18's/CYP Fundraise

When an individual under 18 fundraises for SNAPS, employees should follow the relevant stewardship plan for the activity being undertaken. All reasonable steps should be taken to ensure the CYP understands the rules around any fundraising event/challenge they are participating in and are fit to do so.

Key Points to Highlight to Children and Young People

All rules on fundraising involving children must be highlighted. For example, if they wish to do a street collection, the relevant rules and procedures should be outlined to them such as, they cannot collect on private land without the landowner's permission and buckets must be sealed etc.

There are some fundraising activities which are specifically restricted by age including;

- Street and house-to-house collections;
- Direct debit schemes/regular giving
- Lotteries or raffles; and



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- Events involving alcohol.

The age restrictions depend on the specific activity and where it is carried out, so it is key the fundraising team have all the information required to advise CYP's in the best way regarding their planned activity.

Working with Schools and Youth Groups

When fundraising in schools or youth settings, fundraisers must obtain prior written consent from the institution and parents or guardians where applicable.

Fundraising activities must be clearly explained and participation must be voluntary.

Other Activities

It is recognised that fundraising goes beyond a financial relationship with supporters – for example many individuals volunteer to take part in fundraising events as well as other volunteering activity, such as campaigning or sharing their stories. Where issues relating to people who may be in vulnerable circumstances or who are under 18 arise, the above principles should still apply.

Additional Safeguarding Measures

In accordance with the November 2025 Fundraising Regulator Code, fundraisers must take extra care when engaging with vulnerable individuals and young people.

Fundraisers must be trained to identify signs of vulnerability and respond appropriately.

All fundraising communications must be age-appropriate and avoid any undue pressure or misleading information.

Monitoring and Accountability

Fundraising activities involving vulnerable people and young people must be regularly monitored to ensure compliance with safeguarding standards.

Any concerns or breaches must be reported immediately to the designated safeguarding lead.

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