

FitzRoy Fundraising Weekly Lottery Policy regarding vulnerable people and staff.

FitzRoy is committed to ensuring that all fundraising activity including the FitzRoy Weekly lottery is operated and conducted in a secure, fair, and socially responsible way, actively endorsing responsible gambling amongst its supporters. We want it to be fun to play, whilst raising charitable funds, but not in a way that is detrimental to someone who is vulnerable.

What is a vulnerable person?

Through our work it is inevitable that we will come into contact with people who are vulnerable and not able to make informed decisions about their giving. Because of this we take all reasonable care to identify supporters who may be vulnerable, and to decide what action we take. We recognise that some of the people who engage with our fundraising activities such as the weekly lottery will not always have the capacity to fully understand the nature of the donation they are being asked to make to FitzRoy, or the consequences of making that donation.

An individual 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 experience:

- a diagnosed condition such as dementia
- a recent bereavement
- an undiagnosed or temporary mental health condition such as severe anxiety
- learning difficulties
- difficulty understanding the language

Our obligation to protect vulnerable people

FitzRoy has an obligation to protect vulnerable people and those in vulnerable circumstances. Whenever we suspect that someone we engage with is lacking capacity or is in vulnerable circumstances – we call them a 'vulnerable supporter' – we will take steps to terminate the contact in a way which seeks to:

- protect that person
- protect their dignity
- note any desire they have expressed to support FitzRoy

Fundraising and vulnerable supporters

We believe everyone has the right to donate if they wish to and are able to do so. That's why we offer further support for people in vulnerable circumstances who want to make a decision about whether to make a donation.

Our policy is informed by the Institute of Fundraising's (IoF) code of fundraising practice and their guidance, [Treating Donors Fairly](#).

Our vulnerable person fundraising policy

- FitzRoy is compassionate towards its supporters and will never exploit vulnerability
- We will not actively market our fundraising products including the weekly lottery to the people we support or other vulnerable people
- we will always do everything we can to assist supporters to make informed decisions about the support they choose to give to FitzRoy
- we fully comply with the Fundraising Regulator's Code of Fundraising Practice
- when dealing with supporters via telephone, we follow guidance provided by the Direct Marketing Association (DMA).
- on their behalf to declare vulnerability
- FitzRoy will not contact supporters with the aim of asking for an increase in their giving where the supporters' records indicate a declaration of vulnerability
- regardless of whether a declaration has been made or not, FitzRoy does not accept donations where it has reason to believe that a supporter may be experiencing vulnerable circumstances and that accepting the donation would be ethically wrong and/or harmful to the donor
- should a situation arise where FitzRoy becomes aware that it has unknowingly accepted donations from an individual during a time that he or she was experiencing vulnerable circumstances, it will endeavor to return all donations accepted during this period
- should FitzRoy receive information regarding a supporter's vulnerability from a third party, it will not act on any request to alter the supporters' preferences unless the third party can provide evidence that he or she has authority to act on behalf of the supporter
- if FitzRoy becomes aware of a situation where a third-party agency acting on its behalf has not acted in accordance with this policy, it may stop working with the agency or ask that individual staff responsible for non-compliance with the policy be removed from FitzRoy campaigns

What to do if you suspect a supporter is vulnerable

If you believe you have interacted with a vulnerable supporter whether it is someone we support or a member of the public and you are concerned about their welfare with regards to fundraising activity, please contact the fundraising team directly by emailing fundraising@fitzroy.org.uk or calling 01730 711 111 option 5. Please also refer to the FitzRoy safeguarding policy.

Family members and carers

If you have been alerted to a supporter being vulnerable by a family member or carer. We will act upon this by asking the supporter what kind of communication, if any, is acceptable. please contact the fundraising team directly by emailing fundraising@fitzroy.org.uk or calling 01730 711 111 option 5. Please also refer to the FitzRoy safeguarding policy

We follow the Institute of Fundraising guidance which states that “a donation should not be taken. If after the donation is taken the charity receives evidence that the person lacked capacity to make the decision to donate, then the charity can and should return the donation because the original donation was invalid... If a donor is found to lack capacity, the organisation should put in place measures to ensure that donations are not solicited from them in the future.”

Staff Entry and Incentives Policy

All FitzRoy staff are allowed to purchase weekly lottery entries provided they are not directly *involved* in the promotion or administration of the lottery.