



Policy name	Fundraising with People in Vulnerable Circumstances Policy
Policy summary	Our policy sets out guidance to ensure we are committed to assisting and protecting our supporters to make an informed decision about the financial support they choose to give to the MS Society. We aim to ensure we act appropriately with people who may be in a vulnerable circumstances.
Policy owner/ Responsible Director	Executive Director Engagement & Income Generation
Policy Lead	Quality Manager, Engagement & Income Generation
Audience	All external facing staff, supporters and relevant suppliers, volunteers including third-party fundraisers.
Key Consultation:	Executive Group, Heads of Income Generation, Heads of Finance, Head of Governance, Head of Volunteering and Community Networks
Approver	Board of Trustees, Audit and Risk Committee.
Approval/effective date	May 2025
Approval Cycle	3 years
Next review	2028

1. Introduction

- 1.1. The MS Society believes it is important to have a Fundraising with People in Vulnerable Circumstances Policy as part of its commitment to honest, fair and ethical fundraising and donating. This policy outlines how we identify potential vulnerabilities, the measures we have in place to protect financial supporters in these circumstances and the actions we will take.
- 1.2. The policy covers the MS Society's criteria for identifying potential vulnerabilities in any supporter and the decisions and actions that should be taken. This policy should be read in conjunction with the supporting documents:

Safeguarding Adults policy and procedures – this sets out our position in relation to safeguarding adults who may be at risk.

Acceptance and Refusal of Donations Policy – this explains how we decide whether to accept or reject donations.

Volunteer Involvement Policy – this explains what guidance is given to volunteers and will align with this policy in relation to people in vulnerable circumstances.

Fundraising Regulator Code of Fundraising Practice 2019

2. Definitions

2.1. Person in vulnerable circumstances – an individual who finds it difficult to immediately make an informed decision about the choice offered to them. Examples include but are not exhaustive:

- a person who has suffered a recent bereavement
- a person with learning difficulties
- a person with a diagnosed condition such as dementia
- a person who may have difficulty understanding the language
- a person who has an undiagnosed or temporary mental health condition such as severe anxiety.
- An elderly person; While there is no formal legal definition of "elderly" in the UK, individuals aged 65 and over are generally considered to fall within this category. This age group may be more susceptible to certain vulnerabilities.
- A person under the age of 18 when asking for donations; or under the age of 16 when engaging in fundraising activities
- A person whose donation is likely to affect their ability to sufficiently care for themselves or leave them in financial hardship
- A person who is under the influence of alcohol or drugs
- A person who is unable to protect themselves from financial exploitation

3. Policy statement

3.1. We are committed to making sure that our interactions with new and existing supporters are in line with our values and that people are treated fairly and appropriately. We believe that everyone should have the opportunity to engage in fundraising for and donating to the MS Society. It is our job to ensure we provide a safe environment for this.

4. Purpose and aims

4.1. The purpose of the Fundraising with People in Vulnerable Circumstances person policy is to:

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- Provide staff, volunteers and third-party fundraisers with a clear framework and decision-making tool when dealing with a person in vulnerable circumstances.
- To comply with guidelines as set out in the Fundraising Regulator Code of Fundraising Practice.
- To safeguard and protect people in vulnerable circumstances who would like to support the MS Society financially.
- Provide staff and volunteers with the correct training and support.

5. Scope

- 5.1. This policy applies to all staff, volunteers and third-party fundraisers involved in the MS Society across all Nations of the UK. It also applies to anyone who is seconded, contracted or an agency worker and any other individual providing a fundraising service on behalf of the MS Society.
- 5.2. An Equality Impact Statement has been carried out to ensure this policy meets our standards and any extra measures are put in place.

6. Standards

- 6.1. Our policy is informed by the Fundraising Regulator Code of Fundraising Practice and their guidance: Standards Which Apply to Working with Others.
- 6.2. We should take all reasonable steps to treat a donor fairly, enabling them to make an informed decision about a donation. This includes considering the needs of any potential fundraiser or donor who may be in a vulnerable circumstance or require additional care and support to make an informed decision.
- 6.3. A member of staff, volunteer or third-party fundraiser must not exploit the trust, lack of knowledge, apparent need for care and support or vulnerable circumstance, of any donor at any point in time.
- 6.4. If a member of staff, volunteer or third-party fundraiser knows or has reasonable grounds for believing that an individual lacks capacity to make a decision to donate, a donation must not be taken. They should end the call politely without:
 - making a request for a donation
 - asking about the individual's capacity to make a decision or the existence of vulnerable circumstances

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- 6.5. We will never contact supporters with the aim of asking for an increase in their giving where the supporters' records indicate a declaration of vulnerable circumstances.
- 6.6. Regardless of whether a declaration has been made or not, we will not accept donations where we have 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.
- 6.7. Should a situation arise where a staff member or volunteer becomes aware that they have unknowingly accepted donations from an individual during a time that they were experiencing vulnerable circumstances, they must endeavor to return all donations accepted during this period. Guidance on the return of donations can be found in section 7.11 of the Acceptance and Refusal of Donations Policy
- 6.8. If information is received regarding a supporter's vulnerability from a third party, we 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.
- 6.9. If the MS Society 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 fundraisers responsible for non-compliance with the policy be removed from our campaigns.
- 6.10. If a staff member or volunteer believes they have interacted with a supporter in vulnerable circumstances and they are concerned about their welfare; they must follow our Safeguarding Adults Policy.
- 6.11. If a member of staff, volunteer or third-party fundraiser is in any doubt about whether to accept a donation based on someone's vulnerability, they should speak to their manager/key contact.

7. Acting on behalf of a person in vulnerable circumstances

- 7.1. If we are contacted by a family member, carer, or Attorney about an individual in a vulnerable circumstance, we will ask for a copy of the legal document (LPA or deputyship order) and confirm the individual's capacity. We will confirm the scope and status of the authority (e.g., that it is active, relates to the decision at hand, and permits communication with us). Once we have confirmed the third party's authority, we can allow them to act on the individual's behalf. For example, if they are concerned about a person receiving requests for

financial support, we will ask what kind of communication is acceptable. Our database will then be updated to reflect their wishes.

- 7.2. We will always follow safeguarding and data protection policies to protect the individual's rights.

8. Engaging people in vulnerable circumstances

- 8.1. Everyone should be given the opportunity to engage in fundraising for or donating to the MS Society. Where an adult is deemed to be in vulnerable circumstances, extra measures must be put into place:
 - 8.1.1. It is the responsibility of the event organiser to conduct a risk assessment to determine the suitability of involving a person in vulnerable circumstances in a fundraising event.
 - 8.1.2. Informed consent should be obtained from the person in vulnerable circumstances or their guardians before involving them in any fundraising activities or events.
- 8.2. The safety and well-being of persons in vulnerable circumstances should be prioritised at all times. Appropriate support should be provided and regularly monitored to ensure they can participate safely and comfortably.
- 8.3. If staff and/or volunteers are concerned regarding the welfare of a person in vulnerable circumstances, they should immediately notify the event manager. Guidance must then be followed as per the Safeguarding Adults Policy.

9. Responsibilities

- 9.1. **The Board of Trustees** retains overall accountability for ensuring the MS Society has adequate policies and procedures in place for people in vulnerable circumstances that comply with legal and regulatory requirements.
- 9.2. **The Audit and Risk Committee** has oversight of adherence to the policy and compliance monitoring.
- 9.3. **The Executive Group** is responsible for approving and implementing the policy, monitoring its effectiveness and reporting to the Audit and Risk Committee.
- 9.4. **The Executive Director of Engagement and Income Generation** is the policy owner and is responsible for ensuring the regular review and effective working of this policy as well as reporting annually on the number and nature of issues arising with vulnerable people. This will

then form the basis of making recommendations for improvements to this policy and practice.

- 9.5. The **Quality Manager, Engagement & Income Generation** is the policy lead and is responsible for ensuring the policy is maintained and updated according to the review schedule.
- 9.6. **Line managers (including volunteer managers)** are responsible for ensuring their teams are aware of and adhere to the policy, notifying their line managers as required.
- 9.7. **Appointing managers** are responsible for ensuring new starters are aware of the policy, and contracting managers are responsible for ensuring contractors are aware of the policy.
- 9.8. **All staff and volunteers** are responsible for upholding the policy and ensuring people in vulnerable circumstances receive the right level of support and guidance in relation to engaging in MS Society activities and/or making donations. Any issues should be reported to their line managers.

10. Laws and regulations

- 10.1. The policy complies with the relevant laws and regulations in place at the time of approval. Any changes in laws and regulations before the scheduled review process will be applied as soon as possible.
- 10.2. The policy also complies with the relevant professional and sector standards and codes in force. Where text giving is used for fundraising, all staff are required to adhere to OFCOM regulations.

11. Monitoring and compliance

- 11.1. Individuals are obliged to disclose any actual or potential breach of this policy to their managers.
- 11.2. Any breach, or suspected breach, of this policy by employees will be handled through the MS Society Disciplinary Policy and Procedure. For Volunteers, the procedure is detailed in the Resolving Volunteer Issues (RVI) Policy.
- 11.3. Compliance reporting on the application of the policy will be provided by the Executive Group annually. Any serious breach of the policy will be reported to the Audit and Risk Committee.

12. Training and support

- 12.1. All staff are required to complete mandatory Safeguarding Training which includes supporting adults at risk.
- 12.2. Volunteers are required to complete mandatory Safeguarding Awareness for Volunteers training.

13. Review and maintenance

- 13.1. An in-depth review of this policy will be carried out by the Policy Lead every three years in line with our organisational policy approval process.
- 13.2. The policy will be reviewed sooner if:
 - there has been a significant regulatory change that we must comply with or,
 - as an organisation we have made a significant change to the principles and decision-making criteria within this policy.
- 13.2 Policy updates should be shared with all staff across the MS Society.

14. Appendices

- 14.1 Appendix 1: related documents
- 14.2 Appendix 2: Document Provenance
- 14.3 Appendix 3: Equality Impact Assessment summary



Appendix 1: related documents

Document title	Relationship to this policy
The Fundraising Regulator Code of Practice 2019	Mentioned in this policy / supports implementation of this policy / Related document
The Fundraising Regulator Code of Practise 2025 (effective November 2025)	Mentioned in this policy / supports implementation of this policy / Related document
Safeguarding Adults Policy	Mentioned in this policy / supports implementation of this policy / Related document
Acceptance & Refusal of Donations Policy	Mentioned in this policy / supports implementation of this policy / Related document
Whistleblowing Policy	Related document. For reporting misconduct or other concerns on the areas covered by this policy.
Volunteer Involvement Policy	** Please note this policy is in review stage**

Appendix 2: document provenance

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Date endorsed	Category	Summarise changes made	Reason for changes	Consulted	Changes endorsed by
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[VULNERABLE PERSON POLICY]

[month/ year]	[Scheduled review / Interim update]	[list changes made to policy]	[List the reason for the changes]	[List who was consulted]	[Job title/Board/Committee/ EG]



Appendix 3: privacy impact assessment

Screening question:

Does this policy relate to the gathering, processing, storing or the use of personal identifiable information of staff, volunteers, service users or donors; or gathering processing or storing commercially sensitive information (either ours or partner organisations); or altering processes or systems relating to gathering, processing or storing or use of this information?

NO

Privacy impact assessment summary:

If you answered yes to the above screening question you will need to complete a privacy impact assessment. Please contact the Head of Information Governance for support. Once completed, please include a summary of the PIA here, or 'not relevant' if one has not been completed.

Appendix 4: equality impact assessment

Screening question:

Does this policy or any of its processes have an impact on staff, volunteers, supporters, users of our services or activities or any other people who may come into contact with us?

YES

Equality impact assessment summary:

If you answered yes to the above screening question you will need to complete an equality impact assessment:

Overall risk score: 1.5

[Equality Impact Assessment](#)