Stewardship

Active generosity

Vulnerable Donor Policy

1st September 2022

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1 Aims and Application of this Policy

Partnering with Stewardship to help the world encounter Jesus through the generosity of his church should be a positive and fulfilling experience for all. At Stewardship, our aspiration is that our Donors feel valued and protected, engaging with our vision and with our Partners through generous and prayerful financial giving. We recognise that we will engage with Donors and potential Donors who may be in a vulnerable circumstance, either permanently or temporarily, or may need additional support to make sound, informed decisions.

This policy sets out how we care for vulnerable Donors, how we can identify such persons, and what action we take if we suspect that a person is vulnerable. This policy applies to all staff, contractors, and trustees of Stewardship, and to third party organisations and suppliers working on our behalf.

2 Underlying Principles

Respect

We will always be respectful, being mindful of and sensitive to the needs that a Donor may have. We will strive to respect their wishes and preferences.

'Be devoted to one another in love. Honor one another above yourselves.' (Romans 12:10)

Fairness

We will treat people fairly. This includes, but is not limited to, the avoidance of discrimination against any group or individual based on their ethnicity, health condition or any other protected characteristic.

'There is neither Jew nor Gentile, neither slave nor free, nor is there male and female, for you are all one in Christ Jesus.' (Galatians 3:28)

Responsiveness

We will respond appropriately to the individual needs of our Donors, adapting our marketing approach in tone, language, and communication technique to suit the needs and requirements of Donors.

'In humility value others above yourselves, not looking to your own interests but each of you to the interests of the others.' (Philippians 2:3-4)

Accountability

We will take responsibility for our actions, ensuring that our work is carried out in line with the Institute of Fundraising's Code of Fundraising Practice. We have effective procedures and policies in place to ensure this happens.

'Let everyone be subject to the governing authorities, for there is no authority except that which God has established. The authorities that exist have been established by God. Consequently, whoever rebels against the authority is rebelling against what God has instituted, and those who do so will bring judgement on themselves. For rulers hold no terror for those who do right, but for those who do wrong. Do you want to be free from fear of the one in authority? Then do what is right and you will be commended.' (Romans 13: 1-3)

3 Policy Statement

All individuals may, at some stage in their life, be considered vulnerable. Vulnerability may reflect a wide range of situations, some permanent, some temporary. At Stewardship we believe everyone should have the opportunity to partner in our work. This may include people who are potentially in a vulnerable circumstance. In some situations, it may be difficult to make a clear- cut decision as to whether someone is in a vulnerable circumstance or lacks capacity. Our approach is always to err on the side of caution, recognising that we are often seeking Donors to commit to a long-term relationship of regular giving.

Stewardship does not identify people as vulnerable solely based on disability, age, or any other social indicator. We recognise that each Donor is an individual with a unique background, experience, and circumstance, and treat every interaction on a case-by-case basis. Accordingly, it is not possible to provide a comprehensive set of factors or characteristics which would allow identification of individuals who may be vulnerable.

We follow the definition of vulnerability given by:

- the Direct Marketing Association (DMA) in their document "Framework: Developing a Vulnerable Customers Policy for Internal Use"
- the guidelines on indicators of vulnerability given by the Chartered Institute of Fundraising in their document "Treating Donors Fairly: Responding to the needs of people in vulnerable circumstances"

Where we have reason to believe that a Donor or potential Donor may be in a vulnerable circumstance, we will seek to identify whether the individual has capacity to make an informed decision about their financial giving. 'Making an informed decision' means that, at the point of making the decision, the individual is able to understand the information relevant to the decision, retain that information, use or weigh up that information as part of the decision-making process, and communicate the decision. In cases where we reasonably believe that someone, we're engaging with is unable to make an informed decision, we will not accept gifts or applications to make new gifts.

Where appropriate, we will encourage individuals to support causes in other ways, through prayer, correspondence, and advocacy. In some cases, an individual in a potentially vulnerable circumstance may need additional support to help them make their decision. Additional support might include:

- providing additional information and alternatives
- signposting; providing different contact options (telephone, email)
- checking understanding at appropriate points during the conversation and asking if there is anything that needs further explanation
- delaying acceptance of the gift and/or donation request to give the Donor time to consider it further
- suggesting the Donor gets advice from family/friends.

In cases where we have confidence that an individual in a potentially vulnerable circumstance has capacity to make an informed decision, we will accept gifts, donation requests or new applications to give. In these cases, we will document our decision internally, so it can be reviewed or re-assessed as appropriate to each case.

If we become aware that we have unknowingly accepted gifts and/or donation requests from an individual during a time in which he or she did not have the capacity to make an informed decision, we will return all amounts accepted during this period in line with our Gift Refusal Policy.

Where we are declining a gift/donation or a new application to give, we will always take care not to cause offence or upset to the individual concerned. If there is an appropriate opportunity to do so, we will check the individual's preferences as to whether they would like to be contacted again in the future.

We provide regular training and guidance to staff whose roles may bring them into contact with people who may be in a vulnerable circumstance, so that they are able to identify potentially vulnerable situations, recognise conversational and other indicators of vulnerability, and take appropriate action, either to provide individuals with additional support or to sensitively end an interaction. In some cases, it may be necessary to take the details of the gift/donation or new application, and then re-assess the case within the Giving Services team or Philanthropy team to decide on any further action, such as confirming the details again with the Donor. In these cases, the Giving Services team or Philanthropy team Managers will be responsible for our final decision on whether to accept the gift/donation, in consultation with the Compliance team and/or the board of trustees, if required.

We recognise that, from time to time, we may receive information regarding a Donor's vulnerability from a third party. For some requests, such as changes to communications preferences, we will act on requests where we are satisfied that the third party is acting in the best interests of the Donor. To ensure we are acting in accordance with our Donors' wishes, and in accordance with the Code of Fundraising Practice, to action requests concerning financial matters we will ask for evidence that the third party has authority to act on the Donor’s behalf, e.g., Power of Attorney. The Giving Services team or Philanthropy team Managers will be responsible for our final decision on whether to act on a third-party request. Each request will be treated on its own merits.

Please refer to our Lasting Powers of Attorney Policy guidance for further information.

More Information

If you would like more information about this policy, please contact Stewardship via email: enquiries@stewardship.org.uk, or call 020 8502 5600, or write to Stewardship, 1 Lamb’s Passage, London, EC1Y 8AB.

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