



FRC010 Vulnerable Supporters Policy

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1. PURPOSE

The purpose of this policy is to ensure that appropriate safeguards are in place when engaging with, or accepting donations from, individuals who may be in vulnerable circumstances or lack the capacity to make fully informed decisions.

It should be read alongside:

- The Challengers Ethical Fundraising Policy
- The Challengers Safeguarding Policy
- The Chartered Institute of Fundraising (CiF) Code of Fundraising Practice
- Treating Donors Fairly guidance

This policy applies to all fundraising activity carried out by Challengers staff, volunteers, third-party suppliers, and agencies acting on our behalf.

2. STATEMENT

Challengers is committed to protecting vulnerable people and treating all supporters with respect, dignity, and fairness. We recognise that some individuals we engage with may not always be able to understand the nature or consequences of a donation request. In such circumstances, Challengers will take steps to ensure they are protected from harm, undue pressure, or financial detriment. Challengers will not knowingly exploit vulnerability and will always prioritise the welfare of the supporter.

3. AIMS & PRINCIPLES

The following aims and principles guide how Challengers engages with supporters who may be vulnerable:

3.1 Ethical Principles

- We will never exploit or take advantage of someone's vulnerability.
- Supporters will always be given clear, fair, and transparent information to help them make an informed choice.
- We comply with the Fundraising Regulator's Code of Fundraising Practice.
- When fundraising by telephone, we only work with agencies that comply with the Direct Marketing Association's guidelines on dealing with vulnerable consumers.

3.2 Commitment to Supporters

- Supporters, or those acting lawfully on their behalf, may declare vulnerability at any time.
- Challengers will not contact supporters to ask for an increase in their giving where a declaration of vulnerability is present.
- We will not accept a donation if we believe that doing so may cause harm or is ethically inappropriate.

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- If we discover that donations were accepted from a person who was in vulnerable circumstances at the time, we will review and, where appropriate, return those donations.

3.3 Third-Party Compliance

- All fundraising partners must comply with this policy.
- Where non-compliance occurs, Challengers may cease working with the agency or request the removal of specific fundraisers from our campaigns.
- Challengers will not act on a third-party request to amend a supporter's preferences without satisfactory evidence of authority to act on their behalf.

4. DEFINITIONS

Vulnerable Person

An individual who may find it difficult, either temporarily or permanently, to make an informed decision or manage a fundraising interaction due to factors such as:

- cognitive impairment or conditions such as dementia
- learning difficulties
- a temporary or undiagnosed mental health condition (e.g., severe anxiety, depression, crisis)
- bereavement or significant emotional distress
- difficulty understanding the language used
- signs of financial vulnerability or unrealistic donation intentions

Vulnerable Circumstances

A situation in which an individual is especially susceptible to harm or undue influence because of their personal, financial, emotional, or situational state. Vulnerability may fluctuate and requires flexible, sensitive assessment.

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5. EXPECTATIONS

5.1 Identifying Potential Vulnerability

Fundraisers should be alert to indicators such as confusion, disorientation, distress, inability to understand information, unusual payment intentions, or contradictory statements.

5.2 Required Actions

If a fundraiser suspects a supporter may be vulnerable, they must:

- end the conversation politely and immediately
- avoid requesting a donation or probing into the person's capacity or circumstances
- record the concern in accordance with internal reporting procedures
- seek guidance from the Head of Fundraising before accepting or processing any donation

5.3 Safeguarding Concerns

If there is reason to believe a supporter may be at risk of harm or abuse, the fundraiser must follow the Challengers Safeguarding Policy and escalate to the Designated Safeguarding Lead.

5.4 Recording & Data Protection

- Any notes relating to vulnerability must be factual, minimal, and recorded securely in line with GDPR and Challengers' Data Protection Policy.
- Sensitive personal information should only be recorded when necessary to protect the supporter and fulfil compliance obligations.
- Access to such information must be limited to appropriate staff only.

6. ROLES AND RESPONSIBILITIES

All Staff and Volunteers

- Treat all individuals with respect, dignity, and fairness.
- Follow this policy and raise concerns where appropriate.

Fundraising Team

- Ensure all donation interactions comply with this policy.
- Record and report concerns about vulnerability.

Head of Fundraising

- Provide guidance to fundraisers when assessing vulnerability.
- Approve decisions to accept, decline, or return donations involving vulnerable individuals.
- Ensure third-party agencies comply with this policy.

Designated Safeguarding Lead

- Manage any safeguarding concerns arising in the context of fundraising interactions.
- Provide specialist advice where welfare concerns extend beyond fundraising considerations.

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7. REFERENCES

- Chartered Institute Of Fundraising – Treating Donors Fairly
- Challengers Ethical Fundraising Policy - FRC002
- The Challengers Approach - DC001

8. DOCUMENT CHANGE HISTORY

DOCUMENT CHANGE HISTORY				
Plan Version No.	Release Date	Summary of Changes	Section No./Paragraph No.	Changes Made By
1.	15/11/2023	New policy		Madeline Church
2.	27/11/2025	General review and updated format		Laura Attwater
3.				
4.				