Date: Sept 2026
Next review due: Sept 2027
Responsibility: SMT (Principal/Bursar (with input from Development Manager)

DAME ALLAN'S SCHOOLS

REGISTERED CHARITY NUMBER 1084965

DEVELOPMENT OFFICE

POLICY FOR FUNDRAISING COMMUNICATIONS WITH VULNERABLE SUPPORTERS

1. CONTEXT

This policy responds to the Institute of Fundraising guidance set out in the document called Treating Donors Fairly: Responding to the needs of people in vulnerable circumstances.

These guidelines do not cover children and young people under the age of 18, and the Development Office fundraisers do not actively seek donations from them.

Dame Allan's Schools rely on donations from alumni and other interested individuals and grants from organisations to support the bursary scheme and priority projects for the schools. We aim to communicate with supporters in their chosen method of contact and have a process to allow supporters to change their selected opt-in choices at any time.

Dame Allan's Schools does not identify vulnerable adults based on broad characteristics such as age or disability which might be considered discriminatory.

This document outlines how we take all reasonable care to identify supporters who may be vulnerable, and what action we take if we suspect a person lacks the ability to make an informed decision about making a donation.

2. COMPLIANCE

Fundraising Regulator's Code of Fundraising Practice states:

5.2 Safeguarding and working with people in vulnerable circumstances

In this section, 'you' means a charitable institution or third-party fundraiser.

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. Procedures should set out how fundraisers work with everyone, including:

- The organisers of an activity
- The children taking part in the activity
- The parents, guardians or responsible adults of those children
- All potential donors, including those in vulnerable circumstances

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.

- Returning a donation if you discover that the donor could not make an informed decision at the time of the donation.

You are not expected to assess every existing or potential donor's capacity to make an informed decision. However, fundraisers should be alert to signs that someone lacks the capacity to make an informed decision and support them appropriately.

The four key principles which underpin the Institute of Fundraising's Treating Donors Fairly approach are:

- **Being respectful**

  This means being mindful of and sensitive to any particular 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. Consider what processes and procedures are needed and be prepared to explain your decisions and approach.

3. IDENTIFYING VULNERABLE PEOPLE

By using the term 'vulnerable circumstances', we mean a state in which a person is especially susceptible to harm due to their personal circumstances. Vulnerable circumstances can vary from day-to-day, which may affect the person's behaviour or decisions and means that a flexible response is needed.

Examples of indicators may include:

- Mental illness and mental capacity concerns
- Physical / sensory disability
- Learning difficulties
- Financial vulnerability
- Times of stress or anxiety
- Language barrier
- Influence of alcohol or drugs
- Information provided by a family member or carer

4. RESPONSE TO SUSPECTED VULNERABILITY

Following the guidance of the Institute of Fundraising:

Dame Allan's Schools will not take a donation if they know or have reasonable grounds for believing that a donor lacks the capacity to make a decision about making a gift.

If following receipt of a donation the Schools receive evidence that the donor lacked the capacity to make the decision to donate, then the Schools must return the donation because the original donation was invalid.

If a donor is found to lack capacity, the Schools will put in place measures to ensure that they do not continue to ask that individual for support.

This policy should be read in conjunction with the Schools' Anti-Money Laundering Policy.