

StC Payroll Giving Ltd

FAQ's for charity clients

Q. How are you responding to the changes in regulations concerning fundraising and how charities work with fundraising agencies?

- A.** We have updated our contracts to reflect the new regulations in force as contained in the Charities (Protection and Social Investment) Act 2016, (as amended or replaced from time to time, or any statutory requirements or modifications thereof); and our contract also states that we will abide by the Code of Conduct or Code of Practice for payroll giving fundraising issued by the Association of Payroll Giving Organisations (APGO) and The Code of Fundraising Practice issued by the Fundraising Regulator.

We are registered with the Fundraising Regulator.

It also states that we will abide by our own Ethical Fundraising policy, (as amended or replaced from time to time), copy attached below as Addendum 1 and which can also be seen on the StC website www.stcpayrollgiving.co.uk.

Q. How are you preparing for GDPR?

- A.** We have been going through a GDPR compliance process because we take personal data management, security and integrity very seriously.

We have written a Governance Framework and reviewed and audited each and every one of our policies concerning data security and instigated new policies where necessary.

Given the nature of our business model though, and having taken advice on this subject, we do not think that we are your “data processor”. This is because, properly analysed, we do not process personal data on your behalf. Instead, our analysis of the data sharing arrangement between us is that we are a data controller in respect of the personal data; and, when we share the personal data with you, you also become a data controller in respect of that same personal data. As I am sure that you will appreciate, by treating ourselves as “data controller” in these circumstances, we are in no way looking to diminish our responsibilities under GDPR. Quite the reverse. As “data controller” rather than “data processor”, the legal responsibilities on us are, if anything, even greater. With both of us being data controllers in respect of the donor personal data that we share with you, the key to us both ensuring transparency for the

donors is to adequately describe our data-sharing arrangements in our respective privacy notice documentation.

Data sharing agreement documentation based on a “data controller/data controller” relationship, is included in the new version of our contract and data sharing agreement which has been sent to every charity client. We absolutely applaud transparency and good practice in connection with data sharing arrangements because, like you, we take the security and integrity of the donors’ personal data extremely seriously.

Q. Data Security, what are you doing to keep the donor’s data secure?

A. Our contract states that we will abide by the Privacy and Data Protection Requirements (as amended or replaced from time to time, or any statutory requirements or modifications thereof).

Before 25 May 2018, this means the Data Protection Act 1998 (the DPA), the Data Protection Directive (95/46/EC), the Electronic Communications Data Protection Directive (2002/58/EC), the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2426/2003) (as amended) and all applicable laws and regulations relating to the processing of the personal data and privacy, including where applicable the guidance and codes of practice issued by the Information Commissioner or any other national data protection authority, and the equivalent of any of the foregoing in any relevant jurisdiction. After 25 May 2018, Privacy and Data Protection Requirements shall mean the GDPR, the Data Protection Act 2018, the Electronic Communications Data Protection Directive (2002/58/EC), the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2426/2003) (as amended) and, once in force, the EU E-Privacy Regulation and any subsequently enacted United Kingdom legislation to implement any part of the EU E-Privacy Regulation.

We use Sharefile to disseminate information. ShareFile employs SSL/TLS protocols to protect client authentication, authorization and file transfers.

High-grade encryption - ShareFile secures files in transit with no less than 128-bit encryption using industry-standard encryption protocols.

File Integrity - ShareFile employs a keyed hashed message authentication code (HMAC) to authenticate and ensure the integrity of intra-system communications. ShareFile verifies file size and file hash to ensure integrity.

Link generation - ShareFile download links are uniquely and randomly generated using strong hash-based message authentication codes. ShareFile provides technical countermeasures to protect links from guessing attacks.

Currently no data is stored outside the EU.

The company that we use to process of all our data, Bell Donor Management Ltd, has been assessed and approved by QAS International to the following management systems standards and guidelines:

ISO/IEC 27001: 2013

Q. What is your policy on dealing with vulnerable donors?

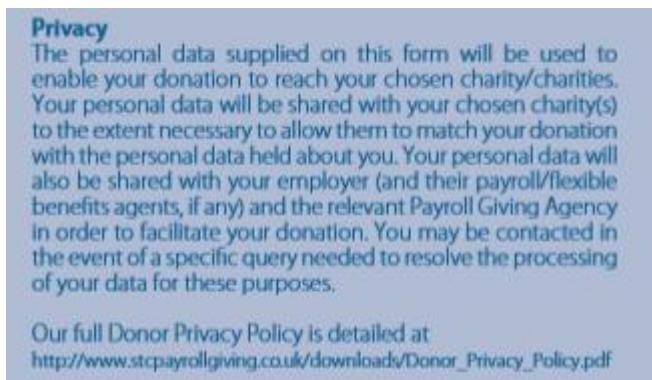
A. Please see our policy attached (Addendum 2)

Q. Are charities able to meet the fundraisers and train them, whilst imparting information about their particular charity?

A. As StC works with circa 200 charities, this would not be practically possible. Also, our fundraisers are invited in to workplaces to promote the payroll giving scheme, not a specific charity. Once a donor has agreed to donate to a charity through the scheme, then he/she is asked which charity they would like to support and materials from charities are used if the donor asks for more information. Our fundraisers are trained to be knowledgeable but impartial when it comes to charity choice.

It must also be remembered that fundraisers may not normally have time to educate a donor about any one charity as they are trying to see as many people as possible in a short time.

Q. Which privacy statement appears on your donor recruitment form?



Privacy
The personal data supplied on this form will be used to enable your donation to reach your chosen charity/charities. Your personal data will be shared with your chosen charity(s) to the extent necessary to allow them to match your donation with the personal data held about you. Your personal data will also be shared with your employer (and their payroll/flexible benefits agents, if any) and the relevant Payroll Giving Agency in order to facilitate your donation. You may be contacted in the event of a specific query needed to resolve the processing of your data for these purposes.

Our full Donor Privacy Policy is detailed at
http://www.stcpayrollgiving.co.uk/downloads/Donor_Privacy_Policy.pdf

Q. Which marketing statement appears on your donor form?

Marketing
Opting in to receive charity marketing communications means you can see how your chosen charity/ies use your donations to help provide their services. 'Marketing' consists of any communication which promotes a charity or its values, so could be anything from a newsletter to a specific appeal.

Using the boxes below, please indicate which channels your charity/ies may use to send you marketing. Ticking as many boxes as possible gives your charity/ies the option of choosing which way works best for them. Please note that you can change your contact preferences at any time by contacting us or the charity

SMS: Telephone: Post: Email:

We will never share your details without consent.

Q. Which disclosure statement appears on your donor forms?

Disclosure Statement

StC Payroll Giving Ltd, company registration number: 7416962, is a professional fundraising organisation. Our services to all involved in the setup and ongoing administration of your Payroll Giving donation are varied and far-reaching, however only if support is generated from our work, are we paid a one-off fee by the charities we represent. Please visit <http://www.stcpayrollgiving.co.uk/charity-partners/> for the full list of charities we represent.

The person you are talking to is a fundraiser paid by StC Payroll Giving Ltd.

We estimate that our annual remuneration this year will be in the region of £670,000, for a projected income of £13,500,000, which will be proportionately shared (in accordance with donations made) by the circa 175 charities we are contracted to. The average life of a Payroll Giver is 8.5 years.

Complaints Procedure

You will find full details of our *Complaints Procedure, escalation of complaints and how to complain* on our website http://www.stcpayrollgiving.co.uk/downloads/Complaints_Policy.pdf

The Association of Payroll Giving Organisations (The APGO)

As referenced in our Complaints Procedure, we are members of self-regulatory body called The Association of Payroll Giving Organisations (The APGO) and as such, we follow a strictly enforced code of conduct that, above all, ensures that employees are able to give to any UK charity regardless of whether or not we represent that cause.

Q. What materials can a charity supply to help raise awareness of their cause?

A. It's good for our fundraisers to have as much information as possible when representing your cause, and they do carry small charity postcards with them that include as much information about the charity as possible. Newsletters are also a great aid for our fundraisers, giving the fundraisers a better

understanding and current news within the charity. Newsletters can either be sent via email as below or a few copies in the post to circulate to our fundraisers.

The most popular giveaways we find most appealing to a donor are things like bears, pens and badges. These seem to be a great incentive to help donor uptake.

Q. Can charities have access to our fundraiser training manual?

A. We are not able to share our whole fundraising training manual as it is business sensitive information, but we can share with you an extract, see attached (Addendum 3).

Bearing in mind that charities work with other PFO's and often fundraise for themselves face to face, our training methods are not for public distribution.

Payroll Giving is different from other forms of F2F fundraising in that we are promoting in the workplace with the permission of employers and we have often spent years building up relationships with these employers. If we are not absolutely ethical with our fundraising, then we run the risk of visiting permissions being retracted. That leads to us having a zero-tolerance policy with bad fundraising practice and fundraisers who do not comply with our policies are let go immediately.

Fundraising training logs can be obtained upon request from:

charityupdates@stcpayrollgiving.co.uk

Q. Are charities able to attend promotions and fundraiser training and carry our "shadowing"?

A. We could not possibly accommodate this for every charity that we work with, but in order for the you to monitor compliance along with current regulations, we will:

- given suitable advance notice, allow a representative from the Payroll Giving Charity Forum (PGCF) to attend one of our fundraiser training sessions, not more than twice a year, and we will share with you any relevant reports produced the PGCF, or by other organisations and APGO approved parties upon request;
- given suitable advance notice, allow a representative from the PGCF to shadow a fundraiser during a payroll giving promotion, not more than four times a year, and share with you any relevant reports produced by the PGCF, or by other organisations and APGO approved parties upon request.

Shadowing and training reports can be obtained upon request from:

charityupdates@stcpayrollgiving.co.uk

Q. How are our fundraisers paid?

A. We are not at liberty to fully disclose pay levels but can assure you that all of our fundraisers are paid a daily rate plus OTE.

Q. How do StC charge charities?

A. We have a scale of costs which depend on the size of the annual donation. (Please refer to your contact for a full listing). This reflects the way that fundraisers are remunerated.

Q. How do charities request a refund if a donor does not materialise?

A. Please refer to your contract for full details but here is an extract:

12.3 The Charity shall: -

12.3.1 raise any query in respect of Donor Recruitment Fees with the Organisation no earlier than five (5) months after the date of a Donor's Pledge (as shown on the signed Donor's Pledge form) so that the matter may be investigated; and

12.3.2 bring any query or discrepancy (including any non-appearance of income) to the attention of the Organisation not later than eight (8) months after the date of the Donor's Pledge;

Q. Where can I get further information about Payroll Giving?

A. See here for a full explanation concerning the scheme and how it works <http://www.institute-of-fundraising.org.uk/library/payroll-giving-manual-2015/>

Q. Who do I contact with a query?

1. Helen Von Trotsenburg - Hvont@stcpayrollgiving.co.uk – Contracts, general queries
2. Lynda Bulford - charityupdates@stcpayollgiving.co.uk – Materials, give-aways, charity news and updates. Also requests for shadowing reports, training reports etc.
3. Suzanne Turner – accounts@stcpayrollgiving.co.uk -invoicing, accounts

Addendum 1

StC Payroll Giving Ltd - Ethical Fundraising Policy

StC Payroll Giving Ltd (STC) is committed to its mission to help charities of all sizes to raise regular income using the Payroll Giving Scheme in order to provide long term income for these charity clients. We commit at all times to be open, honest, fair and legal.

This policy seeks to cover the ethical issues and social responsibility within fundraising. All STC staff involved in fundraising have a responsibility to be aware and have a thorough understanding of the ethical issues referred to in this policy.

1. STC respects the rights of donors to clear, truthful information on the work of STC and to openly report how we manage donors' information responsibly.
2. We will comply with the Fundraising Regulator's Codes of Fundraising Practice as amended from time to time and UK law in every respect, including those regarding openness and honesty with members of the public.
3. As members of the APGO's self-regulatory scheme, we follow their Code of Conduct, which, amongst other things, helps to ensure that organisations raising money for charity from the public do so honestly and properly.
4. We will respect the privacy and contact preferences of all donors. We will respond promptly to requests to cease contacts or complaints and act as best we can to address their causes.
5. We will adhere at all times to the legal requirements the **Charities Act 1992** and the **Charities (Protection and Social Investment) Act 2016** and any amendments made to them. We will ensure that equivalent fundraising activities carried out in Northern Ireland are managed in the same manner.

Our fundraisers will at all times:

1. Provide clear and adequate, written or verbal, information to the public about possible follow-up, including any applicable telephone procedures or other contact details as required by the Data Protection Act 1998 and comply with other provisions of the Data Protection Act 1998;
2. Act honestly and in a manner that does not mislead and will not knowingly or recklessly disseminate false or misleading information in the course of their fundraising duties, nor permit others to do so;
3. Utilise materials as agreed previously with the fundraising organisation;
4. Ensure that in the event of a complaint, a record of the name, address and telephone number of

the complainant is made, and the complainant is referred immediately to the organiser of the activity and to the Fundraising Director of StC as per our complaints procedure;

5. Not directly encourage existing donors in any way to change an existing charitable donation to another fundraising organization;

6. Use a courteous manner that will not bring StC, the charitable organisations or Payroll Giving into disrepute;

7. Ensure that donors are aware that committed giving schemes are intended for long-term donations; that the donor has the right to terminate the agreement at any point; and that charitable organisations' needs may be better served by a one-off donation if the donor does not feel able to undertake a long-term commitment;

8. Terminate any contact politely and immediately upon request;

9. Ensure that donors are aware that they are free to elect to give to any charitable organisation following a Payroll Giving promotion, even if it is a charitable organisation that the fundraiser is not directly representing;

10. Ensure that all materials, especially completed donor forms, are held securely and in accordance with their obligations under the Data Protection Act 1998 and our own privacy policy;

11. Wear photo identity badges provided by StC in a visible place at all times;

12. Ensure that sufficient safeguards exist and are followed throughout the solicitation process to avoid pressurising potential donors, though reasonable persuasion can be used;

13. Ensure that donors are aware that they have the right to terminate an agreement to donate to a fundraising organisation at any point;

14. Make legally compliant statements as to how StC are paid;

15. Process information as swiftly as possible and ensure that information relating to new donors is passed to the relevant parties as soon as possible;

16. When representing multiple organisations, ensure that all clients are represented in an entirely neutral manner;

17. Above all the fundraiser must ensure that the public are protected from unreasonable intrusion on a person's privacy, unreasonably persistent approaches or undue pressure to give, as per the Charities Act 1992 and the Charities (Protection and Social Investment) Act 2016.

18. Before any approaches to solicit donations are made to a group of employees, StC will agree conditions of access with the relevant employer.

Addendum 2

StC Policy for dealing with vulnerable donors.

At StC we want our clients, both charity clients and employers, to feel comfortable with the ways that we recruit donors. This policy aims to make sure that we meet this pledge at all times. We also want everyone who works for us to understand their responsibilities to all donors, whether potential donors or recruited donors. We want to work together in a clear and consistent way, always taking reasonable care to treat everyone fairly.

This policy follows the Institute of Fundraising's guidance *Treating Donors Fairly*, specifically the guidance for fundraisers on responding to the needs of people in vulnerable circumstances and helping donors make informed decisions. The full report can be found here: <http://www.institute-of-fundraising.org.uk/guidance/research/treating-donors-fairly/>

Sections of this policy marked with an asterisk (*) have been taken directly from the Institute's guidance.

As well as the Institute of Fundraising, we are also members of the following professional body:

- Association of Payroll Giving Organisations (APGO)

We abide to follow the codes of each of these organisations and those regulations put forward by the Fundraising regulator and the Charities Act 1992 and the Charities (Protection and Social Investment) Act 2016, (as amended or replaced from time to time, or any statutory requirements or modifications thereof.

We want this policy to inform our working practices and be relevant to all. We will take steps to ensure that this approach is embedded in our organisation's culture and ensure that this policy is visible at all times on our website. <http://www.stcpayrollgiving.co.uk/other-policies/>

We will ensure all those that regularly communicate with donors are fully trained before they do so and that this training is refreshed at least once a year.

How do we identify an individual who needs additional care and support, or may be in a vulnerable circumstance?

The Collins dictionary defines “vulnerable” (amongst other things) as:

1. Capable of being physically or emotionally wounded or hurt
2. Open to temptation, persuasion, censure, etc.
3. Liable or exposed to disease, disaster, etc.

We first need to define someone as vulnerable and then ascertain if this is a permanent or a current life situation. We will not make sweeping judgements on people - for example, age is not necessarily an indicator of vulnerability - and everyone should have the opportunity to donate, if they are able to do so. We also need to bear in mind that actively avoiding someone based on a characteristic such as age could be seen to be discriminatory.

Permanent versus temporary vulnerabilities *

There is some overlap in these indicators above and the tests relating to mental capacity. The important distinction is whether the individual has a complete lack of capacity to make a decision or needs more information and support to be able to make a decision to donate. Fundraisers need to be aware of this difference so that they can make a reasoned judgment and act appropriately when dealing with existing or potential donors. An individual who may need additional care and support, or may be in a vulnerable circumstance, can still have capacity to choose to donate to a charity.

Examples include:

| Permanent | Current life situation |
|--------------------------------------|---|
| Physical & mental medical conditions | Physical & mental medical conditions |
| Disability | Times of stress or anxiety e.g. Bereavement, redundancy |
| Learning difficulties | Financial vulnerability |

| | |
|---|-------------------------------|
| Financial vulnerability | Influence of alcohol or drugs |
| English not being the donors first language | |
| | |

Indicators that the individual appears confused *

It is not possible to provide a comprehensive set of factors or characteristics which would enable fundraisers to be able to always identify an individual who is in a vulnerable circumstance, may require additional support, or lack capacity. Instead, what follows is a (non-exhaustive) list of indicators or triggers which could signal that someone may be in a vulnerable circumstance or lack capacity.

Are they:

- Asking irrelevant and unrelated questions?
- Responding in an irrational way to simple questions?
- Asking for questions or information to be continually repeated?
- Saying 'yes' or 'no' at times that it is clear they haven't understood?
- Taking a long time or displaying difficulty in responding to simple questions or requests for information?
- Repeating simple questions such as:
 - who are you?
 - what charity is it?
 - what do you want?
- Wandering off the subject at hand and making incongruous statements?
- Displaying signs of forgetfulness?

Indicators that the individual may have physical difficulties *

The displaying of physical difficulties by the donor does not necessarily indicate any issues of vulnerability or mental capacity. However, if a donor is experiencing or exhibiting any form of physical difficulty or distress, this could impact on their ability to make an informed decision on their donation at that time and could be addressed by a fundraiser acknowledging and addressing that need.

Are they:

- Unable to hear and understand what is being said?
- Unable to read and understand the information they are provided with?
- Displaying signs of ill-health like breathlessness or making signs of exasperation or discontent?

Indicators that the individual may be in a vulnerable circumstance (or lack capacity) *

Different signs should be more or less apparent depending on the nature of the communication and fundraising interaction – talking to an individual face to face will allow for more signs or indicators to be picked up by the fundraiser who can then respond appropriately. What is important is that fundraisers are alert to any signs given which indicate that the individual may not be able to make an informed decision about their donation.

Are they:

- Giving a statement such as 'I don't usually do things like this, my husband/wife/son/daughter takes care of it for me'?
- Saying that they are not feeling well or not in the mood to continue?
- Indicating in any way that they are feeling rushed, flustered, or experiencing a stressful situation?
- Having trouble remembering relevant information, for example forgetting that they are already a regular donor to that charity (e.g. have an existing Direct Debit), or have recently donated?
- Donating an unexpectedly large gift with no prior relationship?

(NB. There being no prior relationship before a gift is made does not on its own constitute 'vulnerability': many legacy and major donor gifts to charities are given without the existence of a relationship between the donor and charity.)

What should we do if a potentially vulnerable person wishes to sign a donor form?

Interaction with vulnerable people may be unavoidable, especially as it is not always immediately obvious what a person's situation is. How fundraisers respond to the needs of an individual will depend on the nature of the particular interaction and engagement. Fundraisers should be responsive to the needs of an individual and adapt his or her approach to suit those needs and the context.

Examples of how a fundraiser can respond to the needs of an individual: *

- Talk in clear language, avoiding words and phrases that may be hard to understand (but avoid shouting).
- Repeat information.

- Try to reflect the terminology used by the donor which may help to increase/speed up their understanding.
- Be patient and do not rush the individual.
- Provide alternative formats of fundraising materials (different language, accessible formats).
- Be upfront and tell the person why you are communicating with them and check they are happy to continue.
- Ask if they would prefer to be contacted in a different form (email, letter) and offer to contact them at a different time.
- Ask if they would like to talk to anybody else before making a decision.
- Check their understanding at relevant parts.
- Check with a supervisor or HR manager if they are available.

Taking or returning a donation

If you're still unsure about whether or not we should allow the donor to complete a form, you should refer to the following checklist: *

- Check against the charity commission gift acceptance/refusal policy (section 6.3).
<https://www.gov.uk/government/publications/charities-and-fundraising-cc20/charities-and-fundraising>
- See whether the individual has completed a form before or if there is a prior relationship.
- Consider whether the donor was given any additional support at the time of completing the form to help them make an informed decision.
- Attempt to contact the donor to check that the donation, and amount, was intended.
- Make a judgment on whether you think that the person is able to make an informed decision – and if not, then do not process the form without checking with a supervisor or HR manager if they are available.

Ending contact

Based on your assessment of the situation, it may be necessary to end the interaction. When doing this, care must be taken not to cause offense or upset. Examples of ways to end a verbal or email conversation include:

- 'I've taken up enough of your time today, thank you for listening.'
- 'Maybe you would like to take some more time to consider whether you'd like to support us?'
- 'You're welcome to contact us at your convenience to discuss this further...'

Terminating the interaction could depend on whether the individual's vulnerability is judged to be a permanent or temporary situation.

What should we do if we are contacted by a family member or carer?

If a donor – or a family member with power of attorney – contacts to say that a donation was made by someone unable to make an informed choice, then we can (and should) cancel the donation. It may also be appropriate to mark this person on our database as 'do not contact'.

However, if the contact is made by a third party - such as a family member, without power of attorney - we need to be satisfied that the request is being made on behalf of the donor. The onus here falls to the third party to provide evidence that they have the right to represent the donor. We should, of course, remain sensitive to the fact the donor may be going through a permanent or temporary change in circumstances that may be quite stressful to the third party.

In all situations, the outcome and the preferences recorded should be followed up with a written confirmation to the donor.

Addendum 3

StC Payroll Giving Ltd– Training for both employed and freelance fundraisers

All fundraisers undergo a full day's induction to the company where the practices below are discussed. Fundraisers then undergo a full programme of training on site where the points below are put into practice. All fundraisers are visited on site every 6 weeks and a check list is used to confirm that all points below are adhered to. Fundraiser Liaison Managers arrange random site visits to check on all fundraisers to ensure best practice is being followed. Head Office makes weekly random spot check calls to sites to gain feedback on the quality of the visit and the professionalism of the fundraiser. All feedback is used for training purposes. Regular Fundraising training meets are held throughout the year.

Fundraisers are updated with any new fundraising legislations immediately and training manuals and checklists are amended to illustrate this.

- Fundraisers must hold all materials, especially completed donor forms securely as these will contain information of a sensitive nature. These must be kept in a locked cabinet. When sending completed donor forms for processing these must be sent electronically on the iPad provided and sent via the secure Sharefile provided. Donor forms will be collected by the Fundraiser Support Manager on a regular basis
- Fundraisers MUST NOT denigrate other individuals or organisations
- Fundraisers must ensure that identity badges are worn in a visible place at all times along with their solicitation statement which should be shown to all potential donors
- Fundraisers MUST NOT pressurise donors or potential donors, but may use reasonable persuasion

- Fundraisers must act honestly and, in a manner that does not mislead or knowingly or recklessly disseminate false or misleading information in the course of their fundraising duties, nor permit others to do so
- Fundraisers must adhere to the time and location agreed with the employer or contact
- Fundraisers must adhere to the brief agreed before the start of fundraising activities, by either the employer or StC
- Fundraisers must at all times ensure that fundraising is undertaken in such a manner that STC are confident that sufficient safeguards exist and are followed throughout the solicitation process to avoid the application of pressure on potential donors to donate;
- Fundraisers must ensure that in the event of a complaint, a record of the name, address and telephone number of the complainant is made, and the complainant is referred immediately to the Directors of StC
- Fundraisers must not directly encourage existing donors in any way to change an existing charitable donation to another fundraising organisation or change the method by which they are giving unless it benefits the charity i.e. a larger donation or employer matching
- Fundraisers must at all times communicate clearly and transparently with the employer and employees. All bookings are pre-made with the employer and the employees are to be seen as arranged with the employer
- Fundraisers must at all times use a courteous manner that will not bring StC, or the charities represented by them, into disrepute
- Fundraisers must ensure that donors are aware that Payroll Giving/committed giving schemes are intended for long-term donations although the donor has the right to terminate the agreement at any point

- Fundraisers must terminate any contact politely and immediately upon request
- Fundraisers must ensure that donors are aware that they are free to elect to give to any charity following a Payroll Giving promotion, even if it is a charity that the fundraiser is not directly representing
- Fundraisers must use the opt in section on pledge forms during Payroll Giving promotions which shows how an employee wishes to receive literature from the charity, wishes to remain anonymous or does not wish to receive literature. The donor's privacy must be respected at all time
- Fundraisers **MUST** treat all potential donors fairly, enabling them to make an informed decision about any donation. When dealing with vulnerable adults, fundraisers must adhere strictly to StC's policy for dealing with vulnerable donors.
- **Above all the fundraiser must ensure that the public are protected from unreasonable intrusion on a person's privacy, unreasonably persistent approaches or undue pressure to give, as per the Charities (Protection and Social Investment) Act 2016**