

Hands On Payroll Giving Vulnerable Persons Policy

November 2016

This policy covers Hands On Payroll Giving's (Hands On) commitment to fair treatment of adult individuals that may become a Payroll Giving donor that demonstrate vulnerable circumstances. It is applicable to all staff, contractors and volunteers, and anyone acting on behalf of Hands On and their charity partners.

Aim of this policy

This policy ensures that Hands On's fundraising is conducted in a fair and ethically responsible way. This policy will detail what Hands On considers to be indications of vulnerability with the aim that in practice those acting on behalf of Hands On can easily recognise vulnerability and respond to it in a way that is best for the individual.

Definitions

- **Employers** – the entity with which Hands On has agreed to promote Payroll Giving to their employees
- **Employees** – potential Payroll Giving donors that Hands On will interact with (at their Employer's behest) to promote the concept of supporting any charity with a gift from their pay
- **Vulnerable individual** – an individual that finds it difficult to immediately make an informed decision about the choices offered to them. A vulnerable person may experience all or none of the following:
 - a diagnosed condition such as dementia
 - a recent bereavement
 - an undiagnosed or temporary mental health condition such as severe anxiety
 - learning difficulties
 - difficulty understanding the language
- **Institute of Fundraising** - The Professional Membership Body for UK fundraising
- **Association of Payroll Giving Organisations (APGO)** – Professional Membership body for the Payroll Giving sector

Details of Hands On's policy

Hands On is compassionate towards individuals and will never exploit vulnerability. It will do everything it can in order to assist employees in making an informed decision about joining Payroll Giving to donate to any cause they wish.



Hands On follows the Institute of Fundraising's Code of Fundraising Practice, the Association of Payroll Giving's Code of Conduct, and Hands On's Code of Practice at all times. When undertaking Payroll Giving fundraising, Hands On and all representatives:

1. Follow any guideline set out by the Employer, or the Employer's representative to comply with any on-site regulations or advice
2. Allow employees or those acting on behalf of employees to declare vulnerability through the use of a statement providing details of the vulnerability.
3. Regardless of if a declaration has been made or not, Hands On does not accept Payroll Giving instructions where it has reason to believe that the donor may be experiencing vulnerable circumstances and accepting the donation would be ethically wrong and/or harmful to the donor.
4. Should a situation arise where Hands On becomes aware that it has unknowingly accepted Payroll Giving instructions from an individual during a time that he or she was experiencing vulnerable circumstances, it will endeavour to refund all deducted made during this period.
5. Should Hands On receive information regarding a Payroll Giving donor's vulnerability from a third party (excluding the donor's Employer), it will not act on any request to alter the supporter's preferences unless the third party can provide evidence that he or she has the authority to act on behalf of the supporter.
6. Should Hands On receive information regarding a Payroll Giving donor's vulnerability from their Employer, Hands On will take suitable action with guidance from the Employer to evaluate the donor's Payroll Giving instruction.

If Hands On becomes aware of a situation where one of their representatives has not acted in accordance with this policy, it will carry out a thorough investigation of the circumstance and may stop working with the representative. In matters of serious misconduct representatives will not be permitted to continue in their role with Hands On.

How Hands On comply with this policy

Hands On does not identify vulnerable adults based on disability or age or any other social indicator, it deals with each donor on a case-by-case scenario. Hands On seeks to ensure that every employee is equipped with the appropriate information in order to make an informed decision about Payroll Giving. It recognises that in some circumstances it may be necessary to adapt the way in which it communicates with the donor i.e. using braille or a translation service. The need to adapt the way in which Hands On communicates with employees does not necessarily indicate vulnerability.

It is important that each fundraiser, when interacting with an employee, considers all interactions to determine whether or not they should be considered a vulnerable adult. Indicators of vulnerability could be bereavement, illiteracy, illness, disability or other impairment. Fundraisers must always use their best judgment when they have grounds to believe that an employee is vulnerable before making a final decision. The following examples may help identify vulnerable individuals:



- Request for repetition or to speak more slowly
- Evidence of being confused i.e. replying 'yes' to a question that requires a more detailed answer, going off tangent and talking about irrelevancies
- Repeating themselves
- Becoming upset during a conversation
- Not interacting with a fundraiser / taking little or no interest in the information on offer
- Explaining that a relative/friend deals with their finances/personal matters
- Explains that there is a language barrier and they don't understand
- Talking about personal issues and asking for advice
- Explicitly stating that they feel vulnerable

Attention should also be paid to anything that the employee has failed to mention i.e. they fail to identify which charity they wish to support, or how much they authorise to be deducted from their pay.

The above cannot be taken as a definitive list but if an employee exhibits any of the above behaviour, Hands On expects fundraisers to ask the employee to repeat the details of their agreed gift so that the fundraiser can assess whether the supporter has understood clearly the gift that they will be agreeing to.

Fundraisers must also seriously consider the following:

- Whether the employee is able to understand the discussion that you've been having
- Whether they are able to make a decision based on the conversation
- Whether they know all of the facts necessary in order to make a decision
- Whether they are able to communicate their decision regarding a Payroll Giving instruction

Hands On recognises that it may be difficult for the fundraiser to assess the vulnerability of the supporter. Should a fundraiser have concerns about an employee's Payroll Giving instructions they must inform Hands On's Processing Team who will verify details before implementing a deduction from pay.

