Policy on Supporters in Vulnerable Circumstances

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Policy Approver:	Board of Trustees
Policy Owner:	Head of Safeguarding
Distribution:	Internal and External
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REPORTING A CONCERN?

If you need to report any concern or incident, please contact:

Compassion UK - childprotection@compassionuk.org
Compassion Ireland - childprotection@compassion.ie

Or see section 4.3 for further guidance.

Compassion UK and Compassion Ireland ("Compassion") reserve the right to review, amend, modify, and update its policies and procedures at any time and without prior notice to adapt to changing business needs, legal requirements, and best practice.

Please Note: Printing this document may make it obsolete

1. Introduction

Compassion UK and Compassion Ireland ("Compassion") is committed to its mission to release children from poverty in Jesus' name. To make this possible, Compassion partners with supporters through fundraising and supporter care that is legal, open, honest and respectful. Compassion believes that every person is a child of God, uniquely created with their own background, experiences, and circumstances. This belief underpins Compassion's commitment to honour each individual in every interaction. Guided by the ministry's Christian ethos and values, Compassion strives to ensure that in every interaction with the organisation, people are treated with dignity, fairness and respect - regardless of whether they choose to give.

Compassion offers a range of giving and engagement opportunities ranging from one-off donations, regular giving and other fundraising activities to meet the real needs for children and families in poverty. Child sponsorship is generally a long-term commitment, lasting until the child completes their education, usually between the ages of 18 and 22.

Compassion recognises that circumstances can change for supporters who make the generous commitment to bring hope and transformation, to those living in extreme poverty. At times, any supporter may be in a vulnerable circumstance or need extra care and support to make informed decisions around giving. Compassion is committed is to treating supporters fairly, never putting undue pressure to donate, never exploiting anyone's circumstances, and supporting informed choices.

2. Purpose

The purpose of this policy is to set out Compassion's approach to recognising and responding to vulnerable circumstances in all supporter interactions. It aims to protect dignity, promote fairness and support informed decisions about giving. The policy also defines roles and expectations for fundraising partners to ensure concerns are managed consistently, transparently and fairly.

3. Scope

This policy applies to all Compassion employees and associated personnel who are involved in fundraising or communicating on behalf of the organisation. It covers every interaction with both supporters and potential supporters, across all fundraising and supporter engagement activities and through every channel.

Compassion has separate policies which cover:

- Reporting and responding to safeguarding concerns including during interactions with supporters, ensuring these are escalated and managed appropriately. ('Safeguarding Policy')
- The framework for making and documenting reasonable and consistent decisions regarding whether to refuse or return a donation, where capacity or vulnerability is in doubt including escalation routes. ('Policy on Acceptance, Refusal and Return of Donations')
- The standards of behaviour supporters can expect in relation to Compassion's fundraising and supporter care, and how concerns or complaints are addressed. ('Supporter Charter and Complaints Policy')
- The lawful and secure handling of personal and sensitive information, including data relating to vulnerability. ('Data Protection Policy')

> This is a shared policy that covers Compassion UK and Compassion Ireland under the same policy. Where relevant and applicable, some aspects of the policy may be customised to ensure compliance with relevant laws and regulations for each entity.

In the event of any conflict or inconsistencies between the policy and applicable legislation for each entity, the legislation will always take precedence

4. Standards

Our Values in Action

4.1. Compassion's approach to engaging with supporters in vulnerable circumstances is underpinned by the ministry's core values:

- **Dignity** - Honouring every person by using respectful language, adapting pace and format to individual needs, and never applying guilt or undue pressure.
- **Integrity** - Being open and honest about Compassion's mission, checking understanding, ending any interaction on request, and decline or return gifts when capacity is in doubt.
- **Stewardship** - Carrying out proportionate due diligence and taking reasonable steps to avoid accepting donations which are given without capacity or that could cause financial hardship.
- **Excellence** - Training and equipping employees and associated personnel to recognise indicators of vulnerability, tailoring approaches to an individual's needs and escalating concerns promptly.
- **Discernment** - Pausing when unsure, seeking advice, and making balanced, reasonable and consistent documented decisions in the person's best interests.

Our Commitment to Supporters in Vulnerable Circumstances

4.2. Compassion's fundraising and supporter care will always be legal, open, honest and respectful, upholding public trust and confidence in all fundraising activities. All fundraising activities are conducted in line with he UK Code of Fundraising Practice and the Irish Guidelines for Charitable Organisations on Fundraising from the Public.

4.3. Compassion believes everyone should have the chance to give if they wish and are able and strives to ensure that giving is always a positive experience. To uphold this commitment, Compassion will:

- Ensure fair access so that no one is denied the opportunity to give based solely on appearance, age, or perceived behaviour.
- Respect choice by ending fundraising interactions promptly when requested, and by responding compassionately when a regular donation is cancelled without contact and to any request to cease donations due to vulnerability.
- Support informed decisions by taking all reasonable steps to help supporters make an informed decision and decline donations where capacity is in doubt.
- Protect supporters by never taking advantage of trust, lack of knowledge, apparent need for care and support, or vulnerable circumstances of any supporter or potential supporter.

Recognising and Responding to Vulnerability

Recognising Vulnerability

4.4. Compassion trains all employees involved in fundraising or communicating on our behalf of the organisation to identify when someone may be in a vulnerable circumstance and in need of extra support. Potential indicators may include physical and mental health issues, difficulty processing information, communication barriers, challenging life events, or financial hardship. Where capacity cannot be confidently established, decisions err on

the side of caution, prioritising the individual's wellbeing and avoiding any undue pressure particularly where to commit to long-term giving is involved.

4.5. Compassion may offer additional support to help a person make an informed decision. This can include providing information in alternative formats, offering different contact options, checking understanding during conversations, delaying acceptance of a donation, suggesting getting advice from family or friends, offering to follow up later, and using plain language or simplified explanations.

Responding with Care

4.6. Compassion ensures that the dignity of each person guides every interaction and decision. If there is reason to believe a person cannot make an informed decision, the donation will not be accepted. An informed decision requires the ability to understand, retain, weigh relevant information, and communicate a choice.

4.7. If a donation is later found to have been made without capacity, it will be returned in line with Compassion's Policy on Acceptance and Refusal of Donations, ensuring the process is handled with sensitivity and care.

4.8. Compassion recognises that vulnerability may be temporary, fluctuating or permanent and will make reasonable adjustments, such as pausing contact, offering donation breaks, or ceasing requests where appropriate. Before requesting any increase in giving, known or potential vulnerability will be assessed to ensure no disadvantage or financial hardship. Compassion also acknowledges that circumstances can change and improve, and any adjustments or decisions will be reviewed to reflect an individual's current situation.

4.9. If a supporter discloses a risk of harm (to themselves or others), or if a safeguarding concern arises (such as suspected abuse, neglect, or exploitation), Compassion employees and associated personnel must escalate the matter immediately to the Head of Safeguarding.

Anyone can raise a concern by emailing:

Compassion UK: childprotection@compassionuk.org Compassion Ireland: childprotection@compassion.ie

4.10. Information about a person's vulnerability may sometimes come from a third party. Such information is always taken seriously. However, third-party requests related to financial matters are only processed when clear evidence (such as Power of Attorney or written consent) confirms the third party's authority to act on the supporter's behalf.

Fundraising involving Children and Young People

4.11. Compassion complies with all relevant standards on minimum age restrictions for fundraising and protection of children's personal data.

4.12. As a children's ministry, Compassion recognises that families or other supporter groups such as schools or churches often involve children in sponsorship activities, such as praying for and writing to the child they sponsor or giving one-off gifts. Compassion takes reasonable steps to avoid making direct fundraising requests for regular donations to anyone aged under 18 including requesting for the year of birth on all regular giving application to verify age.

4.13. From time to time, Compassion may receive applications for regular giving from individuals under 18.

- For those under 16, only a parent or guardian may donate on their behalf.
- For those aged 16 - 17, parental, guardian, or nominated adult permission is required for any donation from the young person's account. Wherever possible, regular donations are set up in the name of the parent, guardian, or nominated adult. In all cases, permission is obtained and properly recorded before any donation is accepted, including confirmation that the young person can make an informed decision about giving.

Working with Third Parties

4.14. Compassion carefully selects and equips third-party fundraisers and partners, requiring them to uphold Compassion's values, this policy, data protection and safeguarding standards. All third-party fundraisers have written agreements that include compliance with fundraising standards and in particular requirements for identifying and supporting people in vulnerable circumstances.

4.15. If Compassion becomes aware of a situation that a third-party fundraiser or partner representing the organisation has not acted in accordance with this policy, Compassion may suspend or terminate the relationship.

Data Protection

4.16. Information about a person's vulnerability may include special category data. Compassion will only record what is necessary, use a clear lawful basis, apply enhanced access controls, and retain in line with its Data Protection Policy.

5. Associated Policies and Procedures

The following policies and procedures are linked, connected, co-related or relevant to this policy.

• Data Protection Policy	• Policy on Acceptance and Refusal of Donations
• Safeguarding Policy	• Supporter Charter and Complaints Policy

6. Definitions

Term	Definition
Associated Personnel	Refers to casual workers, apprentices, advocates (volunteers), trustees, ambassadors, independent contractors, third party organisations and suppliers working on Compassion's behalf.
Capacity	A person's ability, at the time of deciding, to understand, retain, weigh and communicate information relevant to that decision such as making a donation or sponsoring a child. Capacity is decision-specific and may vary over time.
Child	Every person below the age of 18 irrespective of the age of the majority.
Informed decision	At the time of deciding, the person can understand, retain and weigh relevant information and can communicate their decision.
Safeguarding	Taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse, and harassment from occurring; to protect people (especially children and youth, vulnerable adults, employees and associated personnel) from that harm and to respond appropriately when harm does occur.
Supporters	For the purposes of this policy, "supporters" refers to both potential and existing supporters. This includes individuals who are considering, have expressed interest in, or are currently engaged in giving, sponsoring, fundraising, or otherwise supporting Compassion's work.
Third-party fundraiser/partner	Any organisation or individual authorised to fundraise or communicate with people on Compassion's behalf

Vulnerable Circumstance	A situation in which a person may be especially susceptible to harm or may need extra care and support to make an informed decision; needs can vary over time.

7. Policy Approval and Revision History

This policy will be reviewed and approved every three years or where necessary upon any significant change to legislation or current practice (whichever happens first).

Version Number	Approval Date	Changes Made
V1.0	01-Dec-2018	
V2.0	29-Oct-2021	
V3.0	24-Oct-2025	• New policy document applicable to both Compassion UK and Compassion Ireland. • The policy has been expanded with greater detail and new sections covering areas such as fundraising involving children and youth, third-party fundraisers, and data protection. Clear definitions have also been introduced to improve clarity and consistency.