

Release International

Fundraising with People in Vulnerable Circumstances Policy

Introduction

Release International is a Christian Ministry and this is expressed in our [Ethos Statement](#) and [Statement of Faith](#). The values, attitudes, motivation and relationships of staff and the way the work is achieved is as important as the work itself. We are committed to high standards and to providing an excellent level of service to our supporters and potential supporters, whether or not they are donors, and to everyone who engages with Release International, and aim to treat everyone in accordance with the Christian values at the heart of our ministry.

About us

Through the ministry of Pastor Richard Wurmbbrand and Hebrews 13:3, Release International has been called by God to love and serve persecuted Christians.

We do this by:

- Raising their voice;
- Giving them the 'Tools' they need to live for Jesus Christ;
- Calling UK Christians into fellowship with them;
- Learning lessons of Christian discipleship with them.

Around the world we prayerfully, pastorally and practically help:

- Families of Christian martyrs;
- Prisoners of faith and their families;
- Christians suffering oppression and violence;
- Christians forced to flee.

Fundraising is a necessary and essential part of Release International's work and this policy has been written based on guidance from the Institute of Fundraising (IoF). It applies to all staff employed by Release International, whether full-time, part-time, permanent or temporary, to volunteers and to consultants when they fundraise on behalf of Release. The term staff is used throughout this policy to apply to all of the above.

Aims

- To explain fundraising with people in vulnerable circumstances in the context of Release International.
- To explain Release International's Supporter Charter.
- To explain the requirements for using third party fundraisers.
- To explain understanding of mental capacity and of vulnerable circumstances in relation to fundraising.
- To help to identify someone with lack of mental capacity or in vulnerable circumstances.
- To explain Release International's approach to fundraising with older people.

- To explain how Release International responds to the needs of individuals.
- To set out a process to accept, refuse and/or return a donation.
- To explain when/how to end a fundraising interaction and when to prevent future interactions.
- To explain how sensitive and/or personal information is to be recorded.
- To explain subject access requests and data retention/disposal.
- To explain how to record 'quality assessments' and 'personal declarations'.
- To establish a process for how staff are trained in relation to this policy.
- To establish a procedure for handling any breach in policy.
- To establish a procedure for handling complaints regarding the implementation of this policy.
- To establish a process to implement, monitor, evaluate and review this policy.

Fundraising

Fundraising is a necessary and essential part of Release International's work and we aim to treat all donors fairly and in accordance with the requirements of the Fundraising Regulator Registration Scheme (FRRS), Office of the Scottish Charity Regulator (OSCR) and the Charities' Regulator of the Republic of Ireland; and as such must be compliant with their requirements and abide by the Fundraising Regulator's *Code of Fundraising Practice*. Special consideration must be given to people in vulnerable circumstances and this policy sets out the principles of how we manage fundraising with this particular group of people. This policy should be read in conjunction with Release International's [Fundraising Policy](#), [Data Protection Policy](#) and associated procedures, [Supporters' Complaints Policy](#), [Safeguarding Policy](#) and [Equal Opportunities and Diversity Policy](#).

Beyond meeting regulatory requirements though, and in line with our Christian values, Release International is committed to ensuring that fundraising is a positive experience for all, whether people are already committed as a supporter of Release International or whether they are a new supporter or potential donor. Release International values all financial donations, whether they are of a financially large or small amount and recognises the sacrifice that many people make to give to Release International's work, in obedience to their own Christian calling.

A [Fundraising Policy](#) has been developed which can be found on our website. However, it is necessary to give special consideration to people who are in vulnerable circumstances or who need additional support to make a decision.

It is not Release International's intention to deliberately target fundraising at such people, but it is inevitable that during the course of our usual work which involves fundraising, we will come into contact with such people.

It is not Release International's intention to treat any group of individuals differently based on a personal or protected characteristic, see Release International's [Equal Opportunities and Diversity Policy](#), such as age (real or perceived) or disability (past or present), as this could lead to discrimination; everyone should have the opportunity to donate to Release International's work if they wish to do so.

However, there may be times when donations should not be accepted or where a donor needs additional care and support to make an informed decision. It is important that staff know how to recognise these situations and how to respond appropriately.

There are **four key principles** (four of which are enshrined within the FRRS *Fundraising Code of Practice*) which underpin Release International's approach to fundraising:

- We aim to treat all donors with **respect**, in a way which seeks to respect the wishes and preferences of the donor.
- We aim to treat all donors with **fairness**, not discriminating against any individual or group of people based on their age, appearance or health conditions.
- We aim to **respond** to all donors appropriately, adapting our approach and communications to suit the needs and requirements of the donor.
- We are **accountable** to ensure that the needs of people in vulnerable circumstances are met in our interactions with them.

Release International's *Supporter Charter*

In addition to Release International's [Fundraising Policy](#) and the FRRS's *Fundraising Code of Practice*, we have developed a complementary *Supporter Charter* which reflects our calling and vision as a Christian ministry.

There are **seven principles** enshrined in the *Supporter Charter* as follows:

1. Our fundraising is based on the Bible and its teaching;
2. Our fundraising respects and protects our independence and our Ministry;
3. We fundraise with integrity;
4. We work in partnership with those who support us;
5. We value and respect our supporters;
6. We fundraise in faith and with courage;
7. We are transparent in our fundraising and use of funds.

All staff at Release International are considered to be fundraisers, by the nature of them being ambassadors and representatives of Release International, although some will be in roles where fundraising is more explicit or where their interaction with existing or potential donors is more frequent.

Using Third Parties for Fundraising

In accordance with the Charities (Protection and Social Investment) Act 2016 it is Release International's responsibility to ensure that any third parties fundraising on our behalf maintain the same high standards in relation to people in vulnerable circumstances.

A written agreement will be put in place with the third-party acting on our behalf which must include information on the following:

- Any fundraising standards that the commercial company has committed to be bound by;

- How the commercial organisation will protect people in vulnerable circumstances and others from unreasonable intrusion into their privacy, unreasonably persistent approaches or undue pressure to donate to the charity;
- Any arrangements in place that will enable the charity to monitor compliance with the requirements in the agreement.

In our Annual Report we will include a statement which sets out the following:

- Whether a professional fundraiser carried out any fundraising activities;
- Whether that professional fundraiser is bound by the regulatory system for fundraising;
- Whether Release International monitored the activity carried out by professional fundraisers and how;
- The number of complaints that have been received about fundraising activity;
- What Release International has done to protect vulnerable people.

Understanding Mental Capacity

Mental capacity is the ability to make a decision. There is a presumption that a person has capacity unless it is established that they lack capacity. Whether or not you consider a person to have made an unwise decision, that is different from that person not having the capacity to make that decision.

If staff reasonably believe that an individual is unable to make a decision, they must not accept a donation from that person. If the donation has already been made, and at the time of donating the individual lacked capacity (and we receive evidence of this) we must return the gift. See the section below about Refusing or Returning a Donation.

There is a distinction between an individual lacking the capacity to make a decision (legislated through the Mental Capacity Act) and someone who has the capacity to make a decision but who may be vulnerable at the time of making the decision. Both situations require an appropriate response to be made.

Staff at Release International are not trained in capacity assessment, and further guidance about assessing mental capacity can be found at Appendix 1.

Understanding Vulnerable Circumstances

All individuals may, at some stage in their life, be considered vulnerable or to require additional care or support, depending on their own personal circumstances, health, bereavements, life events and so on. An individual who may need additional care and support, or who may be considered to be in vulnerable circumstances, can still have capacity to choose to make a donation.

It is the context and circumstance that they may be in at the time of making a decision about whether to donate that is relevant. Additional support may include: delaying acceptance of a gift to give the donor time to consider their donation; including a 'cooling off' period if the donor changes their mind; or suggesting the donor gets advice from church leaders/family/friends.

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. Staff need to understand this difference so that they are able to make a reasoned judgement and to act appropriately when dealing with existing or potential donors.

Identification of Persons who Lack Mental Capacity or are in Vulnerable Circumstances

It is not possible to provide a single means to identify someone who lacks mental capacity or who may be in vulnerable circumstances or who may be in need of additional care and support.

However, there are some examples of indicators or triggers which may point to someone who may lack capacity or be in a vulnerable circumstance.

The display of physical difficulties does not necessarily indicate any issues of vulnerability or mental capacity, although physical disability or distress could impact on their ability to make an informed decision at that time.

Examples of indicators which could mean that an individual is in a vulnerable circumstance or needs additional support could include:

- Physical and mental conditions
- Disability
- Learning difficulties
- Times of stress or anxiety (e.g. bereavement, redundancy)
- Financial vulnerability (where a gift from a donor may impact on their ability to sufficiently care for themselves or leave them in financial hardship)
- English not being the donor's first language
- Influence of alcohol or drugs.

Checklist to help identify signs that an individual may be in a vulnerable circumstance:

Is the individual:

- Asking irrelevant and unrelated questions, or displaying signs of forgetfulness?
- Unable to read and understand the information they are provided with, and asking for it to be continually repeated?
- Responding in an irrational way to simple questions?
- 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' and 'what do you want'?
- Wandering off the subject at hand and making incongruous statements?
- Saying that they are not well or not in the mood to continue?
- Displaying signs of ill-health like breathlessness or making signs of exasperation or discontent?

- Giving a statement such as ‘I don’t usually do things like this, my husband/wife/son/daughter takes care of it for me?’
- Indicating in any way that they are feeling rushed, flustered, or experiencing a stressful situation?
- Having trouble remembering relevant information, for example, that they are already a regular donor to Release International or have recently donated?
- Donating an unexpectedly large gift with no prior relationship? (There being no prior relationship before a gift is made does not on its own constitute ‘vulnerability’; many legacy and major donor gifts are given without the existence of a previous relationship between Release and the donor).

Older People

Many of the indicators already listed which could mean that an individual is in a vulnerable circumstance or needs additional support may also apply to older people and staff need to keep these in mind when communicating with older people, although as previously stated, it is not Release International’s intention to treat older people differently or to exclude them from the opportunity to donate, if they wish to do so.

Reasonable effort should be made to ensure that the potential donor understands the information and donation, and the same principles apply as outlined above for people who lack mental capacity or who are in vulnerable circumstances.

Consideration needs to be given to how older people will respond and react to both the volume and tone of any fundraising communications. The Director of Engagement, in consultation with the Head of Communications, annually reviews the volume of Release International communications and considers their suitability to all recipients, including older people. Preferences for communications are regularly sought and recorded, in accordance with Data Protection requirements, from all supporters.

Release Procedure for Major Giving and Older People

Release International has an older age profile of supporters which is in line with older age profiles of attendees of the UK Christian Church; and as such we treat any individual over the age of 75 as an older person for the purposes of this policy. Release International has further deemed any person over the age of 75 as an older person who may lack mental capacity or be vulnerable. Any major gift received by Release International (where the gift or total of gifts made in any one calendar year is greater than £5,000) from a person over the age of 75 will automatically trigger a check for mental capacity and vulnerability. This will include the offer of a meeting locally or a home visit by Release International staff to ensure that the donor is happy to have made a major gift. Release will also allow a 14 day ‘cooling off period’ for all donations made by any supporters over 75, which exceeds £5,000, to ensure older supporters have been given enough time to consider the impact of their major gift on their own personal finances.

Responding to the Needs of Individuals

Staff need to be responsive to the needs of all individuals and adapt their approach to suit the needs of the individual and the context. Examples of the sort of adaptations they may need to make are:

- Talk clearly
- Avoid words and phrases that may be hard to understand
- Avoid shouting
- Repeat information
- Try to reflect the terminology used by the donor
- Be patient, do not rush the individual
- Provide alternative formats of fundraising materials, if they are available
- Be explicit about why you are communicating with the individual, and check if they are happy for you to continue
- Ask the individual if they wish to be contacted in a different way or at a different time
- Ask the individual if they would like to talk to someone else before deciding to make a donation
- Check the individual's understanding at relevant parts of the interaction and ask if there is anything that needs further explanation.

When interacting with an individual who may be in a vulnerable circumstance, staff may provide general help, advice or support to that person by letting them know that there are other charities or services who may be able to help them and it may be appropriate to pass on a website address or organisation's phone number. As Release International is a Christian Ministry, staff may also wish to suggest that the person contacts their own church minister for further support or advice, if appropriate.

Checklist for Accepting and Refusing Donations

- Check the donation against Release's **Guidance on Accepting and Refusing Donations** in Release International's [Fundraising Policy](#) Appendix 3.
- See whether the individual has donated to Release International before or if there is a /prior relationship
- Consider whether the donor was given any additional support to help them make an informed decision
- Attempt to contact the donor to check that the donation, and amount, was intended.
- Complete a **Quality Assessment** and/or discuss with the supporter making a **Personal Declaration Statement**. This will record whether you think that the person is able to make an informed decision – and if not, then do not take the donation. See Appendix 1 for Quality Assessment and Personal Declaration Forms.

Refusing or Returning a Donation

There may be occasions when it is necessary to refuse a donation or to return one and this needs careful consideration; please refer to Release International's [Fundraising Policy](#) for further details.

If Release International has reasonable grounds for believing that the supporter lacks the capacity to make a decision, then a donation should not be accepted. After the donation has been made, if Release International receives evidence that the person lacked capacity to make the decision to donate, the original donation is considered to be invalid and Release International will return the donation.

In other circumstances it may be less clear whether a person had the capacity to make a decision but lacked information or was in a vulnerable circumstance; and so it is necessary to weigh up the benefits of receiving a donation versus the reputational damage that may be caused by accepting the gift.

To return or refuse the donation Release International needs to be reasonably satisfied that the damage caused by accepting the donation will outweigh the monetary benefits. Please ensure that all decisions about returning and refusing donations where necessary are reported to the UK Operations Manager/Director of Engagement **within seven days** of returning or refusing the donation.

Any supporter who makes a donation of £250 or more at a church event or speakers' event should be recorded by staff and volunteers. The supporter will then be referred to the UK Operations Manager to consider mental capacity and vulnerability under this policy **within seven days**. For donations under £250, all staff should carefully consider the information contained in this policy to make a decision on whether to accept or refuse a donation.

Where Release International staff are attending a church event, it is appropriate to seek further advice where possible from local church leaders, if there is any concern about the vulnerability or mental capacity of a potential donor. Raising the issue of vulnerability or mental capacity with a local leader must be done with care and in confidence.

Deferring or Ending a Fundraising Interaction or Conversation

If during a fundraising interaction or conversation staff believe that an individual may be in a vulnerable circumstance or unable to make an informed decision, then they should end the interaction or conversation. This must be done respectfully, taking care not to cause offence or upset the individual. In some situations, it may be appropriate to take the donation details and discuss the situation with the UK Operations Manager/Director of Engagement to decide if the donation can be accepted or not. Please see Appendix 2 for further details about deferring donations and for the Deferral of Donations Form

Wherever possible, staff should check an individual's preference as to whether they would like to be contacted again. To take a donation, you may need to record name, address, email, and telephone details. This could be done on a sign-up sheet, pledge card, petition, by phone, via web, or on a Gift Envelope. We also accept anonymous donations. Where a person may lack mental capacity or be in vulnerable circumstances, you should ask them to complete the paperwork and assist them with it. You should also

offer a **14 day ‘cooling off’ period** to ensure that the person is fully able to consider the impact of this donation on their personal finances. This means that they can change their mind and have their money refunded to them if they let us know within 14 days. You then need to advise SRT and record this on ThankQ, the supporter database.

Preventing Further Fundraising Approaches

If a donor is found to lack capacity, measures need to be put in place to ensure that donations are not solicited from them in the future. We need to record this on ThankQ. We will select the preference on ThankQ: Do not Mail (communications stopped and/or by any means.)

If an individual needs extra support or is in vulnerable circumstances at that point in time, they may not be in the same situation in a few months’ time. Therefore, a commonsense approach will be taken and the individual will not be contacted again for 12 months. Extra care will be taken when contacting that individual in the future to ensure that the individual is happy to be contacted and Release International staff need to be alert for any signs of potential vulnerability in future.

If an individual states that they do not want to be contacted again or should not be contacted via a particular method of communication, their wishes should be respected where allowable under UK law. Please see Release International’s [Data Protection Policy](#) for more details on personal data rights and procedures.

Staff and volunteers need to record the names of people that they have refused donations from. Please see Appendix 3 for the Refusal of Donation in Church Form.

Recording Special Categories of Personal Data

If Release International communicates with someone who they think may need additional care and support to make a donation, a common question from fundraisers is what records they should keep, or not. It may well be that a charity wants to record some information about an individual which helps them to stop that person from receiving fundraising communications, or so that they know that they should refuse a gift if that person makes a donation in the future.

While there can be obvious benefits to recording information, charities have to be aware of their responsibilities under the Data Protection Act 2018 – particularly where the information that they are recording is ‘sensitive personal data’ – including any details of views or opinions about a person’s physical or mental health conditions and religious background or views.

Data relating to living individuals must be treated fairly and lawfully. This includes an obligation on Release International to tell people that we are holding their personal data and an explanation of the purpose(s) for which it is holding that data for all means. Release International staff should avoid recording information about an individual’s physical or mental health conditions or any other sensitive personal data without the awareness and full **express consent** of that person.

The DPA requires that sensitive personal data is stored with the knowledge and in most cases express consent of the individual. The DPA also requires that all information stored about a person, including medical information is accurate, relevant, not excessive and up-to-date. Release International staff should ensure that they periodically review any notes/comments that fundraisers make as part of their records.

Importantly, no-one at Release International should record any judgment about what they perceive an individual's physical or mental condition to be. See Appendix 1 for information about making Quality Assessments and Personal Declarations.

Subject Access Requests; and Data Retention and Disposal

All individuals have the right to make a subject access request to any organisation processing their personal data and get a copy of the information that is held about them by that organisation. Release International has set out its policy on retention of personal data in the [Data and Document Retention Policy](#).

Recording a 'Quality Assessment'

Staff can record their own 'quality assessment' of an interaction with a donor or member of the public. This should not be any assessment of the individual's condition or circumstance, but a review of the quality of the interaction from the fundraiser's point of view.

The quality assessment should be noted and recorded on ThankQ so that it can help guide and inform future fundraising activity. It is important for fundraisers to exercise caution when recording any assessments of an individual, avoiding opinions which may constitute personal data. See Appendix 1 for information about making Quality Assessments and Personal Declarations.

Such information would need to be disclosed if the individual ever made a subject access request. For example, if the statement had included an opinion about Mr John Edwards' health, the charity may be required to disclose that statement if Mr Edwards ever made a request to see the personal data held about him by the charity.

An Individual's 'Personal Declaration'

While in most circumstances ministries can't record sensitive personal data without the individual's permission, all individuals can freely give information to a charity that they would like that organisation to keep a note of. The charity can then record the information on the database which can help manage their communications to that individual as well as tailor them to be appropriate and sensitive.

If an individual provides information to the charity that contains sensitive personal data, for example by making a statement about their condition or circumstance, the charity could ask the individual if they would like the information to be recorded so that they can best manage their communications in the future. A personal declaration can be given in writing or by a verbal statement. Please see Appendix 1 for information about making Quality Assessments and Personal Declarations.

Training

All staff receive induction relevant to their role within Release International. Roles which have specific interaction with supporters in relation to fundraising, such as Development Managers (DMs), who have face-to-face contact with supporters and existing donors or potential donors, and the Supporter Relations Team (SRT), who are the interface with the public via written correspondence, emails, phone calls and website queries, receive training specific to their role and to Fundraising, including this policy.

Breach of Policy

If a member of staff is considered to have breached this policy it will be dealt with in accordance with Release International's [Disciplinary Policy](#).

Complaints

If a member of staff has a complaint that this policy has not been followed correctly they may raise this using the [Grievance Policy](#).

Implementation, Monitoring, Evaluation and Review

This policy has been approved by the Trustees. It will be implemented by the Director of Engagement. We will monitor it on an ongoing basis. The policy will be evaluated and reviewed every two years or sooner as appropriate.

Laura Hayes
Approved by Trustees
Review

May 2020
June 2020
June 2022

APPENDIX 1 – QUALITY ASSESSMENT AND PERSONAL DECLARATION FORMS

Introduction

A **Quality Assessment Form** should be completed after any interaction with a supporter if the quality of their interaction raises any concerns about the vulnerability or mental capacity of a supporter.

Quality Assessments should not draw any conclusions about the person's mental health, physical health, vulnerability or mental capacity. Release International staff are not permitted by law to record a speculative note on ThankQ about the supporter's personal circumstances without **express consent**. However, we can make a basic assessment of the quality of the interaction that gives rise to any concerns.

If you have met with, or spoken to, a supporter by phone, or they have written or emailed you, or texted you; and you have concerns, please make an assessment of the quality of the interaction by completing a **Quality Assessment Form**.

Please also add the **Quality Assessment Form** to the supporter record as an attachment to ThankQ Please also record this on the **Quality Assessment and Personal Declaration master log**.

Where a supporter makes a comment or disclosure which explicitly mentions any health condition, including any mental, emotional or physical health condition, Release International staff are not permitted to record that on the ThankQ **without express consent**.

If a supporter makes a declaration about any serious mental, emotional or physical health conditions, you should always check to see if the supporter would like to make a written **Personal Declaration** to us about their mental, emotional or physical health condition which can and should be recorded on ThankQ.

This **Personal Declaration** can and should be recorded on ThankQ database only if **express consent** is obtained verbally or in writing. (See notes and procedure about **Personal Declarations** below.)

You should notify the Operations Manager or Director of Engagement immediately an incident occurs which would trigger **Quality Assessments** and/or **Personal Declarations**.

You should record all **Quality Assessments** and attach it to ThankQ **within three days** of the event.

Please do note this is a subjective score on quality and not a conclusion or a disclosure about a health condition. We are only seeking to understand our supporter and get a sense of the quality of the interaction.

QUALITY ASSESSMENT FORM AND GUIDANCE NOTES

Quality Assessment Form
Supporter name:
Supporter ThankQ no:
Church leader name:
Church name and address:
Staff name:
Staff title:
Date of Quality Assessment:
Please indicate the location or medium of the interaction:
Church event: (please tell us where and when this took place)
Other Release International general engagement meeting:
Personal visit for major donors:
Email:
Web enquiry:
Social media post: (Please circle)
Facebook Twitter Instagram YouTube Whatsapp
Phone call:
Letter:
Date of interaction:
Date added to ThankQ and referred to the Operations Manager/Director of Engagement:

Question 1

Clarity of communications

Please tell us, using the scale one to 10 (where one is poor and 10 is excellent) the clarity of the communication. How clear was the communication? (Please tick).

1	2	3	4	5	6	7	8	9	10
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Here are some examples:

- a) A letter: the handwriting was very spidery and looked like it was written with a shaky hand: Score 4
- b) At a meeting: in discussion the language used by the supporter was confused: Score 2

Question 2

Distress, high emotion or confusion in communications

Please tell us, using the scale one to 10 (where one is very distressed and 10 not distressed at all) the level of distress, emotion or confusion exhibited throughout the communication. How distressed, highly emotional or confused was the supporter? (Please tick).

1	2	3	4	5	6	7	8	9	10
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Question 3

Logic and sequencing in communications

Please tell us, using the scale one to 10 (where one is poor and 10 is excellent) the level of logic and sequencing exhibited throughout the communication. How logical was the supporter? Were statements and sentences delivered in a coherent and logical order? (Please tick).

1	2	3	4	5	6	7	8	9	10
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Question 4

Fantasy or delusions in communications

Please tell us, using the scale one to 10 (where one is poor and 10 is excellent) how balanced and realistic was the supporter and did they express themselves coherently? (Where a score of 10 indicates statements that are fully sound and balanced) How realistic was the supporter? (Please tick).

1	2	3	4	5	6	7	8	9	10
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Question 5

Supporter safety

Please tell us, using the scale one to 10 (where one is very concerned and 10 is not concerned at all) how concerned you are about the safety of the supporter or any person

the supporter may come into contact with, such as adults or children at their church. How safe was the supporter and those around him/her? (Please tick).

1	2	3	4	5	6	7	8	9	10
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Question 6

Release International staff safety

Please tell us, using the scale one to 10 (where one is very concerned and 10 is not concerned at all) how concerned you are about your safety or the safety of any Release staff during or after the communications. Did you feel threatened or did the supporter make you feel uneasy or fearful or shocked by speaking in an inappropriate, abusive or aggressive manner? (Please tick).

1	2	3	4	5	6	7	8	9	10
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NEXT STEPS

We need to consider the total score from the Quality Assessment, and whether we need to refer the supporter on to external statutory or local pastoral care and support.

Quality Assessment Question	Score:
Question 1	Score:
Question 2	Score:
Question 3	Score:
Question 4	Score:
Question 5	Score:
Question 6	Score:
Total Score	Score:

For any scores of **30 or less** you will need to ask for a **Personal Declaration** to be made which will allow us to record sensitive personal data about health, vulnerability and mental capacity declared by the supporter with express consent.

If the supporter does not wish to make a **Personal Declaration** that is fine. Please only complete the **Quality Assessment Form** and record on ThankQ that a **Personal Declaration** was offered and declined.

We will also need to contact the supporter’s local church leader and/or social services and/or emergency services (NHS/police/fire) and advise them of our concerns if needed. We are permitted to do that under the Data Protection Act **without express consent** where there is a clear threat to life or it is in the vital interests of the supporter.

Please go to the **Personal Declaration Form and Guidance Notes** below.

EMERGENCY PROCEDURE

In an emergency and where you have any concerns that you are dealing with a life-threatening situation, please alert the Operations Manager/Director of Engagement, another Director if required, and the Safeguarding Lead at Release International immediately, who will call a meeting to consider and agree referral of the supporter into ongoing support or emergency services.

Where immediate threat to life is apparent call 999 yourself without any delay. Please record this activity on ThankQ without drawing any conclusions about the situation. Simply record that you have concerns about safety and have called the emergency services. Please record this on the **Quality Assessment and Personal Declaration master log**.

PERSONAL DECLARATION FORM AND GUIDANCE NOTES

Personal Declaration Form

Name of supporter:

Supporter ThankQ no:

Name of Church leader:

Name and address of Church:

Staff name:

Job title:

Date of Personal Declaration:

Location/medium of Personal Declaration:

Church event:

Other meeting:

Personal visit:

Email:

Web enquiry:

Social media:

Phone call/text:

Letter:

Personal Declaration Statement Script for Staff	
Please read out the following Personal Declaration Statement to the supporter:	
<p>“I hereby give my express consent for Release International to record the following Personal Declaration Statement about my mental health, my physical health, my personal circumstances, or any other physical conditions, or relevant comments, about my vulnerability and/or my mental capacity.</p> <p>This will be held on our supporter database for a maximum of seven years after which it will be securely disposed of our deleted.</p> <p>I understand that I give my express permission for this Personal Declaration Statement to be recorded by Release International as sensitive personal data under the Data Protection Act 2018.</p> <p>I further understand that I can ask for this Personal Declaration Statement to be removed or amended at any time on the supporter database and within one month of a written request being received by Release International.</p> <p>Release International will send you written confirmation of the Personal Declaration Statement to you in writing within one month.”</p>	

Please record here exactly what the supporter shares with you. You should type this or write this down and then read it back, and then verbally confirm it is correct.

Personal Declaration Statement	
Signed staff member:	
Date of Personal Declaration Statement:	
Confirmation of the accuracy of the Statement was given by the supporter:	YES/NO
Date referred to Operations Manager/Director of Engagement:	
Date entered on ThankQ:	
Date referred to alternative Director:	
Name of Director lead:	
Date referred to Safeguarding Lead:	

Date referred to social or health services; or local pastoral support:	
Date referred to emergency services:	
Date of Release emergency meeting and link to notes:	
Date written copy of Personal Declaration Statement sent to supporter:	

Next Steps

You should record all **Personal Declaration Statements** on the **Quality Assessment and Personal Declaration master log** each time [insert link]; and alert SRT and the Operations Manager/Director of Engagement to any new **Personal Declaration Statements** that have been made as soon as possible. Please note all actions and diarise appropriately for follow up.

APPENDIX 2 – DEFERRING DONATIONS PENDING FURTHER INVESTIGATIONS

In some circumstances, where you believe that the person you are talking to may be in vulnerable circumstance of have mental capacity problems, you should take the details of the donation, then seek further advice from the Operations Manager or Director of Engagement.

Please record all deferred donations on the Deferred Donations Register, held on the S: Drive. [Deferred Donations Register.xlsx](#)

Please complete this Deferral of Donations Form in this case for both cheques received and bank card payments. It is important that bank card details

Deferral of Donations Form
Name of donor:
Amount of donation:
Deferred donations register reference no:
Payment method: Cheque or Bank card
Cheques should be held in a safe and clearly labelled Deferred Donation and a copy of this form attached. Records of bank card Deferred Donations must also be held in the safe.
Cheque: Name of account holder
Cheque: Account no.
Cheque: Sort code no.
Card details: Type of Card Visa Debit/Mastercard/ Visa
Card no:
Sort code no:
Name of card holder as shown on the card:
Security no:
Date enquiry made:
Date referred to Operations Manager/ Director of Engagement:
Date of final decision:
Date donation taken:
Date called supporter with decision:
Date decision letter issued and recorded on ThankQ:
Date cheque or bank Deferral of Donations Form is destroyed or deleted:
Please record that you destroyed or deleted personal data in the Data Disposal Log in the Data and Document Retention Policy.

APPENDIX 3 – REFUSAL OF DONATIONS AT CHURCHES OR EVENTS

Staff and volunteers attending church services, events and conferences may refuse donations. Where the refusal is made in a church environment it is important that we record that refusal on ThankQ against that church record. Please complete the following form and return to SRT within seven days of refusing a donation in a church.

Refusal of Donation in Church Form
Name of donor:
Name of church:
ThankQ ID no. of church:
Date form completed:
Staff or volunteer name:
Date form sent to SRT:
Date SRT recorded on ThankQ
Reason(s) donation refused:
Notes: