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# Protecting Vulnerability Policy

## Version 1.0 2024

**Note: This policy has been updated to reflect the current situation within the UK and the prevalence of the Covid-19 virus. It is based on the advice provided by the UK Government, therefore, it is essential that Government advice is regularly reviewed. Should there be a conflict between this policy and the Government advice in relation to Covid-19, the Government advice will take precedence.**

**Protecting Vulnerability**

**Introduction**

Appco Marketing requires all employees, contractors, and sub-contracted commercial and charity brand ambassadors to respect every member of the communities in which we operate on behalf of our charity and commercial clients. As trusted ambassadors for our clients, we – and all sub-contracted brand ambassadors – are committed to doing everything we can to protect those who may be considered to be in vulnerable circumstances.

Employees and brand ambassadors are expected to take all reasonable steps to treat all donors or customers fairly and to enable them to make informed, unpressured decisions about their donations, services choices or purchases. Employees and brand ambassadors are required to never exploit the credulity, lack of knowledge, apparent needs for care and support, or vulnerable circumstances of any donor.

This policy pertains to all Appco Marketing employees and outsourced business partners, including the brand ambassadors and any other customer facing personnel they contract.

**Scope**

**Appco Marketing employees and contractors**

Appco Marketing requires all employees and contractors to abide by this policy and adhere to all of the processes set out within it. All sub-contracted brand ambassadors representing Appco Marketing’s clients must comply with the expectations, training and procedures set out in this policy.

Appco Marketing employees who have direct contact with donors or customers – such as our quality assurance team – receive additional training on identifying and protecting vulnerability.

**Defining and identifying potential vulnerability**

Vulnerability, or potential vulnerability, cannot be clearly defined because it covers a range of circumstances and conditions (both temporary and permanent) and differs for every individual.

It can cover a wide range of situations ranging from illness, financial hardship, mental health or physical disability. Vulnerability often includes, but is not limited to, individuals who are evidently:

* unable to communicate in English
* hearing or speech impaired
* chronically ill
* forgetful or confused
* under the age of 18
* elderly and/or of pensionable age
* living in rural/isolated areas
* living in sheltered housing
* on low incomes or make references to financial difficulties
* under the influence of drugs or alcohol
* suffering a bereavement or other stressful situation

In light of the COVID-19 pandemic, potential vulnerability could also include but is not limited to, individuals who are evidently:

* identified as high-risk for contracting COVID-19
* are self-isolating
* anxious about face to face interactions due to risk of infection
* anxious about the financial and economic impacts of COVID-19
* experiencing financial difficulties due to COVID-19
* experiencing mental health difficulties due to COVID-19

Being able to recognise and protect people in potentially vulnerable circumstances is an absolute requirement for all brand ambassadors representing Appco Marketing’s clients and all Appco Marketing employees who have contact with donors or customers. All parties are required to be vigilant at all times for signs of potential vulnerability.

However, it is important to note that a person who fits in one or a number of the above circumstances is not necessarily vulnerable.

Brand ambassadors and Appco Marketing employees are required to use their training and initiative to assess whether an individual is able to commit to an ongoing donation, a contract for goods or services or a purchase and/or requires extra support to make the decision to donate on a regular-giving basis.

**Additional measures to protect vulnerability during face-to-face interactions**

Appco Marketing complies with all sector guidance and regulations on protecting vulnerability. All brand ambassadors are required to always provide, in a clear and transparent manner, all the information people need to make informed decisions about their commitment.

To further protect those in potentially vulnerable circumstances, Appco Marketing has proactively implemented the following robust processes and standards for all brand ambassadors representing our charity clients.

**Vulnerability training for brand ambassadors**

Appco Marketing runs regular training sessions to ensure all sub-contracted Marketing companies, and in turn any brand ambassadors understand and abide by the following vulnerability protection measures:

* absolute vigilance for signs of potential vulnerability
* when fundraising, using a ‘Thanks for Listening’ card to help politely disengage from a person who they suspect may be vulnerable is a useful tool. However, this may not be appropriate at this current time with the Covid-19 virus and the risk of virus transmission. Therefore, the person should always be asked if they wish to receive a card, or that it can even be left on the doorstep to be collected as and when by the householder.
* always providing, in a clear and transparent manner, all the information donors or customers need to make informed decisions about their commitment to the charity or service they have selected.
* always taking into account and protecting the needs of any potential donor or customer who may require additional support, or who may be in a vulnerable circumstance, by:
  + asking questions to assess whether they are able to commit to an on-going donation or understand what they are signing up to
  + double-checking the person understands what they have committed to by always using the checklist (see below)
  + cancelling a form if the brand ambassador recognises signs of potential vulnerability during the sign-up process

In light of COVID-19, training materials of sub-contracted Marketing companies and in turn brand ambassadors has been updated to include health and safety measures in accordance with sector and government guidance to ensure the protection of any potentially vulnerable persons. This includes but is not limited to:

* Maintaining and respecting social distancing rules
* Wearing the required PPE (personal protective equipment) to ensure the safety of brand ambassadors and the public
* Double-checking that the person is happy to have a face to face conversation with the brand ambassador
* Being polite and respectful about any objections to the activity, as the public may be more anxious than usual about face to face interactions

**Donor/Customer checklist**

Brand ambassadors must ensure that every donor or customer completes and signs a checklist in addition to their donor pledge form or customer service request form as part of the sign-up process. In light of Covid-19, donors are offered the opportunity to make a contactless pledge. Where this Is the case, they will be presented with a summary of what they are committing to on their own device.

This process confirms the person's understanding of what they are committing to and accompanies every sign-up form. If a signed checklist is not completed, the donor's pledge or customer’s form is not processed.

**Additional measures to protect vulnerability**

**Territory management**

Within our residential fundraising work, Appco Marketing operates an industry-leading territory management system, which allows us to identify the demographics of potentially vulnerable people. Appco Marketing has used this information to exclude specific locations from our fundraising activity.

**Quality-assurance and verification calls**

For the fundraising work Appco Marketing does on behalf of its charity clients, Appco Marketing’s contact centre call donors without exception, to anyone over 75 years of age before their direct debit is processed, to thank them for their generosity and to check they are happy with the sign-up process and the fundraiser.

These calls are recorded and monitored for quality purposes.

If Appco Marketing cannot speak to a donor who is over 75, their pledge is not processed, they are highlighted to the relevant charity as a potentially vulnerable person and the charity is not charged by Appco Marketing for this donor.

If, during the verification call, a donor demonstrates any confusion or unease, or questions what they have signed, their donation will be cancelled, and our quality assurance manager will investigate the issue.

Appco Marketing works closely with its commercial clients and will utilise point of sale verification calls which are conducted with call centre agents independent from the brand ambassadors. These calls will confirm the details and quality of the sale with the customer, checking for signs of vulnerability. If there any reported issues our quality assurance manager will investigate the issue.

**Contactless options**

In light of COVID-19 Appco Marketing has reviewed the way it collects and processes donor information. To minimise the requirement for any physical contact, brand ambassadors have the option of offering to complete the sign up via contactless methods. This includes the use of QR Code and SMS technology that enables the potential donor to input sensitive personal information on to their own device to complete the signup form.

**Monitoring and managing breaches of this policy**

Breaches of the Appco Marketing vulnerability policy are taken very seriously. Should we receive any complaints in this regard, we will fully investigate with all parties involved and will not hesitate to take all necessary action.

Appco Marketing has strict remedial measures in place should we conclude that an employee or sub-contracted brand ambassador has not followed our guidelines.

If any brand ambassador is found to have wilfully signed or attempted to sign a vulnerable person knowing that they were in a vulnerable circumstance, then their identity badge will be terminated with immediate effect and they will no longer be able to represent any of Appco Marketing’s clients.

Version Control Table

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| --- | --- | --- | --- |
| **Version Number** | **Purpose/Change** | **Author** | **Date** |
| 1.0 | Document released | Isabel Montoya-Perez, General Manager | 2024 |