



YOUR HOSPICE LOTTERY AND MAKE A SMILE LOTTERY CODE OF CONDUCT AND COMPLIANCE 2025

This conduct and compliance document includes essential safety measures that have been implemented to protect our team and the public. Every fundraiser must read and sign this documentation as well as being given Gambling Commission Training before being allowed to represent the hospices and charities we fundraise for.

- ✓ Every fundraiser must have had a valid DBS check before starting work.
- ✓ All fundraisers will always have identification on them.
- ✓ Pictures of all fundraisers will be evident on the Your Hospice Lottery and Make a Smile Lottery websites.
- ✓ The Fundraiser Procedure is in line with some of government and governing bodies' recommendations.
- ✓ Fundraising tablets are powered by Ideal Host which includes a mode in which the potential lottery player can choose to confirm their play on their own device.

FUNDRAISING PROCEDURE

Fundraising Claims

All fundraising communications—whether verbal, written, or digital—must be accurate, clear, and not misleading. This includes any statements made by fundraisers during public engagement, as well as promotional materials used to support fundraising campaigns.

1. Accuracy and Honesty

- Fundraisers must ensure that all claims about the charity, its work, and the impact of donations are factually correct and up to date.
- Exaggerated, ambiguous, or unverifiable statements must be avoided.
- If a claim is based on projections or estimates, this must be clearly stated.



2. Transparency

- Fundraisers must be clear about how donations will be used and which organisation(s) will benefit.
- If a donation is split between multiple causes or includes administrative costs, this must be disclosed.
- Any conditions or restrictions on donations must be explained to the donor.

3. Avoiding Misleading Information

- Fundraisers must not omit key information that could influence a donor's decision.
- Visuals, testimonials, or statistics used in fundraising must not misrepresent the charity's work or outcomes.
- Fundraisers must not imply urgency or distress unless it reflects the actual situation.

4. Use of Impact Statements

- When describing the impact of donations, fundraisers must use real examples or case studies that reflect typical outcomes.
- Statements such as "Your donation will help save lives" must be supported by evidence or clarified as part of a broader programme.

5. Regulatory Compliance

- All fundraising claims must comply with consumer protection laws and advertising standards.
- Fundraisers must be familiar with the Fundraising Regulator's guidance on responsible communications and avoid any form of misleading advertising.



6. Internal Review and Approval

- All fundraising materials and scripts must be reviewed and approved by a designated compliance officer or manager before use.
- Fundraisers must report any concerns about misleading claims or unclear messaging to their supervisor immediately.

Public Lottery Fundraising

This guidance is part of a series of resources produced by the Fundraising Regulator and Chartered Institute of Fundraising that aims to support charities and other fundraising organisations to conduct any fundraising activities in a responsible way.

Fundraising in public: principles and key considerations

Fundraising must be carried out responsibly and the health, safety and wellbeing of the public, fundraisers and volunteers must come first. The risks associated with the activities are being regularly monitored and managed.

Give way to the public.

Our Fundraisers will never cause any physical obstruction to the public. If any setting does not enable the fundraiser to give way to the public, then fundraising will not take place in that setting.

Maintain a static position.

The code allows fundraisers to approach the public, for example by taking up to three steps alongside them. If supporter doesn't engage in this time, fundraiser will stop the activity and return to his static position.

Make sure your behaviour is respectful.





You must take all reasonable steps to make sure your fundraising is carried out in a way that reflects positively on fundraising in general. This includes: not unreasonably intruding on a person's privacy; not putting undue pressure on a person to donate; not using unreasonably persistent approaches; and accepting a request to end an interaction. You should be mindful of how your interaction can affect others in a public space, so it's important to be aware of others around you and the space you are in.

You must comply with applicable equality legislation, including the Equality Act 2010 in England, Wales, and Scotland, and equivalent laws in Northern Ireland.

Use fundraising sites responsibly.

If part of a site becomes particularly crowded, for example, due to multiple queues forming, you should reposition yourself while also meeting the requirements of any Site Management Agreement that may be in place.

Limit the number of fundraisers.

- For door-to-door fundraising, no more than four fundraisers will work together at the same time and only one fundraiser at a time will approach a household.
- For private site fundraising, the number of fundraisers will be set by the terms of the relevant agreement with the site owner.

Make sure ID badges and mandatory information is accessible.

Lottery Fundraisers will always have identification badges on them. Lottery Fundraiser pictures are also apparent on the Your Hospice and Make a Smile Lottery websites.

Carefully select your door-to-door fundraising territory.

When selecting territories in which to fundraise, be particularly mindful of places where there may be greater numbers of people who may be more vulnerable. Keep a knock sheet and record every door that has been approached.



Co-operate effectively with third parties and due diligence.

If you work with third parties, it is important that you are clear about your expectations in relation to fundraising conduct and the approach that should be taken as pandemic restriction measures are eased. All agencies that work for MAS and YHL will provide copies of their risk assessment and policies.

To ensure ethical, transparent, and compliant fundraising practices, Your Hospice Lottery and Make a Smile Lottery are committed to robust due diligence and ongoing monitoring of all fundraising activities, including those carried out by third-party agencies.

1. Third-Party Fundraiser Oversight

- All external fundraising agencies must undergo a thorough vetting process before engagement, including checks on their compliance history, safeguarding policies, and training standards.
- Agencies must provide up-to-date risk assessments, safeguarding policies, and evidence of staff training.
- Contracts with third-party fundraisers includes clear expectations regarding conduct, data protection, and adherence to the Fundraising Regulator's Code of Practice.

2. Monitoring Fundraising Activity

- Regular audits and welcome call spot checks will be conducted to ensure fundraisers are complying with agreed procedures and ethical standards.
- Tablets will record fundraisers activity, including working pattern and donor interactions. Any incidents or complaints must be raised with the line manager immediately.
- Line managers are responsible to review fundraising performance and behaviour through direct observation, feedback collection, and data analysis.

3. Documentation of Decisions



- All significant fundraising decisions—especially those involving vulnerable individuals, complaints, or unusual donor circumstances—must be documented and raised with line manager immediately.
- Fundraisers are expected to record any decisions made during interactions that deviate from standard procedure, including reasons and outcomes.
- These records will be reviewed periodically by the lottery team to identify trends, risks, and opportunities for improvement.

4. Continuous Improvement

- Feedback from donors, staff, volunteers, and partner organisations will be used to refine fundraising practices.
- Complaints and concerns will be logged, investigated, and used to inform training and procedural updates.
- Fundraisers will be encouraged to share insights and suggestions for improving ethical standards and public engagement.

5. Compliance with Legal and Regulatory Standards

- All fundraising activities must comply with relevant laws, including data protection (UK GDPR), consumer protection, and equality legislation.
- Fundraisers must be familiar with the Fundraising Regulator's Code of Fundraising Practice and receive regular updates on changes to regulatory requirements.

Listen to feedback.

We listen and reflect on feedback we receive from the public, staff, and volunteers as this will help to inform the way we carry out fundraising during this period. Activity will be continually reviewed, considering comments, complaints, and feedback.

Consider the needs of people in vulnerable circumstances or with protected characteristics.



It is inevitable that fundraisers will meet people who may be in a vulnerable circumstance or need additional support to make an informed decision. You must take into account the needs of anyone who may be in vulnerable circumstances.

You should also consider the needs of those with protected characteristics, such as those who are hearing or visually impaired.

Please also refer to our vulnerable people policy on how to interact with vulnerable persons.

Do not apply undue pressure to donors.

Be polite and respectful.

Be mindful of how the public may respond to your fundraising.

Do not knock on doors or estates with no-canvassing stickers/signs displayed.

When fundraising door-to-door, do not enter donor's property, even when invited.

Do not collect donor's personal information unless willingly shared by themselves.

Vulnerable People Guidelines

It is inevitable that you will come into contact with people who may be in a vulnerable circumstance or need additional support to make an informed decision. This guidance is intended to help and support you deal with those situations.

It is important to proceed with caution with any members of the public who you suspect may be vulnerable. We must do our best to avoid signing these people up even if they have indicated that they wish to do so! But equally we must not be seen to be discriminatory or judgmental of potentially vulnerable members of the public. These guidelines will assist you in deciding whether the individual with whom you are speaking could potentially be vulnerable and therefore you should end that interaction and you shouldn't sign them up.

"Vulnerable" is defined as somebody who you suspect may not be capable of informed consent about what they are doing - i.e.: they don't completely understand what they are signing up to do or what happens next. The most common types of vulnerability in this context are:

- Physical and mental medical conditions, disabilities, and difficulties (both permanent and temporary, including learning difficulties)



- Age
- Stress and anxiety
- Poor grasp of English
- Under the influence of alcohol or drugs.

If you believe that an individual may be in a vulnerable circumstance or unable to make an informed decision, then **you should end that interaction.**

How you can identify someone who may be vulnerable;

- Asking irrelevant and unrelated questions.
- Responding in an irrational way to simple questions.
- Asking for information to be continually repeated or continually asking the same questions.
- Obviously not understanding what you are saying and changing the subject of what you are discussing
- Taking a long time or displaying difficulty in responding to simple questions or requests for information.
- Displaying signs of forgetfulness.
- Indicating that they are currently stressed or in difficult times (e.g.: because of job loss, bereavement, ill child or parent, having to act as a carer for a child, parent or relation)
- Indicating lack of affordability to maintain the donation for any of the same reasons
- 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 stressed
- Unable to read or understand the information you are giving to them
- Displaying signs of ill-health such as breathlessness or looking exasperated or discontented.
- Indicating that they are not financially capable of making and maintaining the donation, e.g.: they say that they never have any spare money and can barely afford to pay their bills or rent, they are in debt, they take lots of loans



Age does not necessarily mean that an elderly person is vulnerable. But please be aware of the above indicators when engaging with an elderly person in order to judge whether s/he is potentially vulnerable.

How you should engage with someone you suspect may be vulnerable

It is important to always clearly explain the reason you stopping and engaging with any person you speak to whilst you are fundraising. If you suspect, once your engagement with that person has started, that the person may be vulnerable then please take extra care and do the following:

- Explain as clearly as possible the reason for you stopping that person
- Ensure your ID is clearly on show (photo facing out) and hold it out for the person to see.
- Talk in clear language, avoiding words and phrases that may be hard to understand (but avoid shouting).
- Repeat information.
- Be patient and do not rush.
- Repeatedly check the person is happy to continue.
- Ask if they would like to talk to anybody else before making a decision.
- Check their understanding at relevant parts of the engagement
- Ask if there is anything that needs further explanation

How to end a conversation with someone who you feel might be vulnerable

If you believe that the person with whom you are engaging is not capable of informed consent to make and maintain the donation, then you should end that engagement. But this must be done politely and courteously.

A polite way to end the engagement is to say, "I've taken up enough of your time today, thanks for listening", or "Maybe you need some more time to consider whether you'd like to support <the charity/the hospice>."

- If the individual is keen to donate but you have identified them as a potentially vulnerable person, explain to them the direct methods to do so via the charity website and main telephone number.



- If, at any stage during or after the engagement, you suspect the person has been alarmed, distressed or confused by your conversation, contact your Manager and report the incident.

Fundraiser Protection

We are committed to ensuring the safety, wellbeing, and dignity of all fundraisers representing Your Hospice Lottery and Make a Smile Lottery. In accordance with the Fundraising Regulator's Code of Fundraising Practice (Rule 2.1.2), we take all reasonable steps to protect fundraisers from harm, harassment, and undue pressure while carrying out their duties.

1. Safe Working Environment

- Fundraisers must be provided with appropriate training, including safeguarding, conflict resolution, and dealing with challenging situations.
- Fundraisers should be briefed on site-specific risks and have access to risk assessments for each location.
- Fundraisers must be equipped with mobile phones or other communication tools to report incidents or request support.

2. Reporting and Escalation

- Any incidents of harassment, abuse, or threatening behaviour must be reported immediately to a line manager or designated safeguarding officer.
- A clear escalation procedure is in place to ensure fundraisers feel supported and protected.
- All reports will be treated seriously and confidentially, with appropriate follow-up and support provided.

3. Lone Working and Door-to-Door Safety

- Fundraisers working alone or in door-to-door settings must follow lone working protocols, including regular check-ins and route planning.
- Fundraisers must not enter a donor's property under any circumstances, even if invited.
- Territories should be selected with safety in mind, avoiding areas with known risks or where fundraisers have previously experienced hostility.

4. Respect and Dignity

- Fundraisers must be treated with respect by colleagues, the public, and partner organisations.



- Discrimination, bullying, or harassment of fundraisers will not be tolerated under any circumstances.
- Fundraisers are encouraged to speak up if they feel unsafe, unsupported, or unfairly treated.

5. Mental Health and Wellbeing

- Fundraisers should be encouraged to take regular breaks and manage their workload to avoid burnout.
- Access to mental health support or employee assistance programmes should be made available where possible.
- Managers should regularly check in with fundraisers to assess wellbeing and offer support.

Link to Official Guidance and Support Materials

Fundraisers are encouraged to familiarise themselves with the Fundraising Regulator's support guides, including resources on documenting decisions, monitoring third-party fundraisers, and identifying vulnerable individuals.

- [Code of Fundraising Practice \(2025\)](#)
- [Guidance on Working with Third Parties](#)
- [Documenting Fundraising Decisions](#)



Cybersecurity Advice for End Users

Dear end users,

It is not with any pleasure that I write this to you, nor is it intended to make you feel like you've done anything wrong. You might have - you just didn't realize it, but don't worry, you're not alone. In fact, I imagine many people that you work with have fallen prey to one or more of the behaviours that I mention.

You probably believe magic goes on behind the velvet curtain labelled IT that protects your computers and mobile devices from harm, and, in a way, there is. IT staff work tirelessly to prevent all of those desktops, servers and mobile devices from getting hacked or infected with malware, ransomware, and other security threats. The truth is those desktops, servers, mobile devices, and networks are only as secure as you allow them to be.

That's right, in many instances the burden falls on your shoulders. Don't worry it's not that hard.

Instead of couching this advice in terms you may or may not understand, I'll make it as clear as possible. The best piece of cybersecurity advice I can give you is this: When in doubt, don't do it. Such generalities could leave you staring blankly at your screen and unable to function, so here are some specific security best practices.

- Don't click suspicious links. If you don't know if a link is suspicious, ask.
- Don't install any software on your PC or mobile device unless it comes from the operating system's built-in software store.
- Don't install browser add-ons unless they are sanctioned by your company.
- Don't visit websites that seem dodgy. What is a dodgy website? Products advertised on social media, sites that advertise products or services that sound too good to be true, sites that want to install applications on your computer, or any domain found on a list like the Fake Sites Database.
- If you absolutely must visit a dodgy site (say you're doing research for a marketing department and want to know why a product is listed as must have), do it on a tablet that can easily be reset to factory default and doesn't contain company data.
- Update your passwords with really strong ones that you can't memorize. I know that's a pain, but there's a solution: Ask your IT staff about how to use a password manager.
- Don't open email attachments that haven't been checked by your antivirus package.
- Don't open text messages from unknown senders.

I know this list seems daunting, but it all supports the original idea of, "When in doubt, don't do it."



It is no secret that, among IT professionals, the pervading feeling is that the weakest link in a company's security is the end users, but it doesn't have to be that way. All you must do is stick to the above list of cybersecurity best practices, and you'll make the lives of your IT staff exponentially easier.

But don't take this personally. It's not you. Actually, it might be you. But not 100% of the time, more like 80-90%.

Just remember, it's not that hard to keep those PCs safe from evening wear and formalwear... got you again! Come on, end users... keep up with me.

You can do this. I have faith in you. But just in case, repeat to yourself, "When in doubt, don't do it."

Thanks for reading

St Helena IT Department.

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