



YOUR HOSPICE LOTTERY AND MAKE A SMILE LOTTERY CODE OF CONDUCT AND COMPLIANCE 2024

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.
- ✓ Risk assessments within this document are in line with government guidance and are checked by the Head of Health and Safety at St Helena Hospice.
- ✓ The Fundraiser Procedure is in line with some of government and governing bodies' recommendations.
- ✓ Fundraising tablets are powered by Ideal Host in which the potential lottery player can choose to confirm their play on their own device so they will not need to touch the screen.



FACE TO FACE FUNDRAISING PROCEDURE

Public Lottery Fundraising

This procedural document is prepared for the Your Hospice Lottery (YHL) and Make a Smile Lottery (MAS) following guidance from the Health and Safety Executive (HSE).

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 be able to fundraise 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 steps alongside them.

Make sure your behaviour is respectful.

You should check that an individual is happy to talk with you and be respectful about personal space. 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 can find more information on behaviours and general fundraising principles in [our guidance here](#).



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

Co-operate effectively with third parties.

If you work with third parties, it is important that you are clear about your expectations in relation to fundraising conduct. All agencies that work for MAS and YHL will provide copies of their risk assessment and policies.



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.

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.