



VULNERABLE DONORS POLICY

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UCKG HELPCENTRE VULNERABLE DONORS POLICY

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1. **POLICY STATEMENT**

The Universal Church of the Kingdom of God (also referred to in this policy as the UCKG HelpCentre, UCKG or the Charity) is a Christian organisation and registered charity in England and Wales. That aims to provide, in all its HelpCentres and related faith and outreach activities, an inclusive environment – in line with Biblical principles – where anyone can learn about and practice the Christian faith, and receive advice, guidance and practical assistance to life's problems.

The Charity promotes that beneficiaries and the general public contribute financially to support its work, which is essential to ensure its continuation and expansion, and educates congregants on the Christian practice of faith offerings to thank, praise, and challenge God on the fulfilment of His promises.

The Charity welcomes and is thankful for all donors and their generous contributions that support the critical work it does, and for the blossoming of faith relationships out of every expression of faith through faith offerings.

The Charity recognises that existing or future donors may at some stage in their lives face vulnerable circumstances or become vulnerable and that this could impact their decision making and overall experience in financially supporting the Charity and/or their faith relationship and related offerings to God.

2. **AIMS AND PURPOSE OF THIS POLICY**

The UCKG has an unwavering commitment towards its objectives of advancing the Christian faith and implementing general charitable purposes, understanding and embracing the pressures and high expectations placed on faith organisations in modern society.

The Charity believes and is committed to ensuring that everyone should have the opportunity to support its work financially, and express their faith in God through faith offerings, and that both should be a positive and extremely rewarding experience for all.

The Charity recognises that it is unavoidable that it will engage with donors that are vulnerable or in vulnerable circumstances, and that may require additional support to make sound and informed decisions. This policy determines how the Charity will identify and care for vulnerable donors, and the actions it will take when vulnerabilities are identified, informed or self-declared.

3. **SCOPE OF THIS POLICY**

This policy is for use and applies to all of the Charity's trustees, ministerial staff (that's bishops, bishops' wives, consecrated and non-consecrated pastors, pastors' wives, assistant pastors, universal biblical institute trainees, missionaries and any other ministerial staff in training), administrative staff (that's full-time employees, part-time employees, any freelancers, any administrative volunteers and anyone on work experience), and all levels of volunteers (that's anyone that volunteers at any church group, activity or event, any community outreach group, activity or event, any charitable or humanitarian activities or events, and fundraising). And, relates to all aspects of the work of the Charity – encompassing any and all of its ministerial work (that's regular prayer services, special faith purposes and events, advice and guidance sessions, visits, faith groups, projects and initiatives, etc.), community groups and outreach work, fundraising work or administrative work (including any trading subsidiaries and initiatives) in the United Kingdom and the Channel Islands.

4. PRINCIPLES OF THIS POLICY

The practices within this policy are based on the principles contained in UK legislation and any applicable guidelines provided by the Charity Commission for England and Wales and the Fundraising Regulator, and specifically takes the following into consideration (in alphabetical order):

- Adult and Support Protection (Scotland) Act 2007
- Charities Act 2011
- Code of Fundraising Practice
- Equality Act 2010
- Human Rights Act 1998
- Mental Capacity Act 2005
- Safeguarding Board Act (Northern Ireland) 2011
- Safeguarding Vulnerable Groups (Northern Ireland) 2007

This policy operates in conjunction with the following policies from the Charity (in alphabetical order):

- Fundraising Policy
- Safeguarding Policy
- Whistleblowing Policy

5. DEFINING VULNERABLE DONORS

For the purpose of this policy, the Charity makes the distinction between a donor lacking the capacity to make a decision (legislated through the *Mental Capacity Act 2005* and all subsequent amendments) and someone that has the capacity to make a decision but may be vulnerable at the particular moment of making a donation.

The Charity recognises that it can be difficult to make a clear cut decision as to whether or not someone falls into one of the categories described above. The Charity will not identify vulnerable donors based on specific personal characteristics like age, gender, race, or disability or any other protected characteristic but on a case by case basis, where a precautionary approach and best judgement must prevail.

The following non-exhaustive lists are for indicators or behaviours that could signal someone may be in vulnerable circumstances or lack mental capacity.

Indicators of individuals that could be in vulnerable circumstances or lack mental capacity to make a decision may include:

- Financial vulnerability;
- Times of stress or anxiety;
- A long-term or temporary disability or limiting illness;
- A long-term or temporary mental health condition;
- Influence of alcohol or drugs.

Behaviours of individuals that could lack mental capacity to make a decision may include:

- Asking irrelevant and unrelated questions;
- Responding in an irrational way to simple questions;
- Asking for questions or information to be continually repeated;

- Taking a long time or displaying difficulty in responding to simple questions or requests for information;
- Displaying signs of confusion and forgetfulness;
- Indicating in any way they are feeling rushed, flustered, or experiencing a stressful situation.

6. **ENGAGING VULNERABLE DONORS**

The Charity rarely engages with existing or potential donors directly to solicit donations. Indeed, the Charity mainly makes public appeals to beneficiaries and the general public for the financial support of its work, and educates congregants on faith offerings during its public prayer services.

Where the Charity was informed, identified or someone declared themselves as being vulnerable, it will respond to the vulnerable individual's needs and/or circumstances and adapt its approach to suit those needs and the context, which may include:

- Using simpler and clear language;
- Being patient and compassionate;
- Repeating information where needed;
- Asking if they would like to speak to someone else before making a decision;
- Checking their understanding throughout the conversation;
- Sending information for them to review in their own time before deciding.

The Charity will not accept or retain a donation if it is known or there is good reason to believe that a vulnerable individual lacks capacity to make a decision to donate, or is in vulnerable circumstances that means they may not be able to make an informed decision.

In cases where the Charity has the confidence that a donor in vulnerable circumstances has capacity to make an informed decision, their donation will be accepted or retained, with the relevant considerations and decision process recorded so that it can be reviewed or reassessed as appropriate.

7. **HIGH DONATIONS DUE DILIGENCE**

In addition to its considerations on engaging vulnerable donors, the Charity will always conduct appropriate research and enhanced scrutiny to minimise potential risks on all donations or faith offerings in excess of £2,500, which will include assessments to identify any donor vulnerabilities.

The Charity receives many smaller donations that, due to capacity, will not trigger the same level of research and scrutiny as this would not be practicable, proportionate or reasonable.

8. **RESPONSIBILITY**

The Charity's board of trustees has overall responsibility for the approval and oversight of this policy.

Responsibility for the implementation and adherence to this policy is delegated to the senior management (that's the bishop in charge and the general manager) of the Charity.

9. **REVIEWING THIS POLICY**

This policy is approved and endorsed by the Charity's board of trustees and will be reviewed annually, within the first quarter of the year, or whenever there is a learning experience that makes it mandatory to amend/update the policy. All reviews for any given year will be listed in the Version Control Sheet on page 7. The Legal Department is responsible for reviewing and updating this policy.

VERSION CONTROL SHEET

Version	Approved by	Valid from	Expired on
01 for the year 2026	Board of Trustees	Mon 01 Jun 2026	-