

Complaints Report 2018/19



FUNDRAISING
REGULATOR

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This report is in two parts and brings together learning from our own investigations alongside the data on fundraising complaints reported by the charity sector. The reporting period for the two parts differ as we changed our financial year end in 2018.

Part one: Complaints received by the Fundraising Regulator between 1 September 2018 and 31 August 2019.

Part two: Complaints reported by the charity sector between 1 April 2018 and 31 March 2019.

Welcome to the Fundraising Regulator's Annual Complaints Report for 2018/19.

This is the third year in which we have reported on the key themes arising from our casework and complaints handled by the charity sector. Together, this information gives us a picture of the nature of fundraising complaints, and where we may need to provide further support to the sector. This report should help fundraisers identify opportunities for learning for their own organisations, and encourage improvements in fundraising practice and complaints handling across the sector.

Throughout the year both charities and third-party fundraisers continued to demonstrate their commitment to upholding the standards of the Code of Fundraising Practice. We are encouraged by their dedication to continually improve the way in which they fundraise. Where we have identified breaches of the code, the organisations concerned have accepted our findings and have taken steps to make improvements. I am pleased to note that the fundraising sector is responsive to feedback and puts learning from our investigations into practice in a timely manner.

During this reporting period, our board took the decision to begin naming the organisations we investigate. This change is intended to promote and support a culture of sustainable and ethical fundraising; allow the public, donors and potential donors to make informed decisions when they choose to donate to charity; and to ensure we are transparent about our investigations process. It also brings our investigations process in line with other regulators, such as the Charity Commission for England and Wales. Our investigation summaries include more detail than previously to make them more useful for the public and the organisations we regulate.

This year was the first time that a case we investigated was taken to external review. This was requested by a charity after we investigated and upheld a complaint about its fundraising. The independent external reviewer partially upheld the charity's complaint. After three years of operation, we welcome the opportunity to have our casework scrutinised and agree that the review highlights some important learning for us. We have committed to implementing the recommendations in full and you can read more about the review on pages 13-14.

Looking ahead, we will be reviewing the information contained in future reports and the data collected via the Annual Complaints Return to ensure that it is of most value to the sector. We expect to engage with the sector on the future shape of this report within the next year, and we would very much appreciate your feedback. I do hope your organisation finds the information that follows useful.

This is my last report as a member of the Fundraising Regulator's Board. I would like to pay tribute to the work of our Head of Complaints, Catherine Orr, and her team for their work in consolidating our complaints regime and securing its place in the system of charity regulation in England, Wales and Northern Ireland.

Michael Smyth CBE QC (Hon)

Chair of the Complaints and Investigations Committee



Key Findings

This report is split into two parts – fundraising complaints received by the Fundraising Regulator (part one) and fundraising complaints reported by the charity sector (part two).

Key findings from the Fundraising Regulator’s casework include:

- We received 737 complaints and completed 82 investigations.
- In 49 investigations we identified at least one breach of the Code of Fundraising Practice.
- Some of the key themes emerging from our investigations included:
 - **safeguarding vulnerable people**;
 - the use of **misleading information** in fundraising communications; and
 - a failure to observe ‘no charity bag’ signs when fundraising using **clothing collections**.

Key findings from the complaints reported by the charity sector include:

- The total number of complaints reported in 2018/19 was 20,541, which is 6% lower than the 21,851 reported in 2017/18.
- **Addressed direct mail**, **door-to-door fundraising** and **outdoor events** were the most complained about methods of fundraising.
- Complaints about clothing collections, online advertising and email fundraising fell significantly on the figures reported in 2017/18, by 55%, 16% and 15% respectively.

Fig 1: Key themes from our casework



Fig 2: Key themes from the charity sector



Part one: Complaints received by the Fundraising Regulator

We investigate complaints about fundraising where these cannot be resolved by fundraising organisations themselves. We do so by considering whether the charity or fundraising organisation has complied with the Code of Fundraising Practice (the code), which outlines the standards expected of all charitable fundraising organisations across the UK.

We deal with complaints about fundraising in England, Wales and Northern Ireland, and fundraising in Scotland where it is carried out by charities registered with the Charity Commission for England and Wales or the Charity Commission for Northern Ireland.

Our remit

We investigate complaints where the code may have been breached by a fundraising organisation. For example:

- ✓ If a member of the public believes a fundraising organisation has made misleading or excessive requests for donations.
- ✓ If a member of the public believes a fundraising organisation has been disrespectful or treated them unfairly when seeking donations.
- ✓ If a fundraising organisation is not transparent or open about the relationship it has with a third party, for example, an agency working on its behalf.
- ✓ If a fundraising organisation has failed to respect a donor's wishes, for example, if a donor has asked to be contacted only in a certain way.
- ✓ If a fundraising organisation has not dealt appropriately with a complaint made by a member of the public about fundraising.

However, we cannot investigate:

- ✗ Complaints about allegations of serious or sustained misconduct by those in management and control of a charity. These are usually matters for the Charity Commission for England and Wales, the Charity Commission for Northern Ireland or the Office of the Scottish Charity Regulator.
- ✗ Complaints that an organisation is claiming to be a charity when it is not, including allegations of fraud or criminal activity. These concerns should be taken to the police or ActionFraud.
- ✗ Complaints about employment or contractual matters, either from a member of the public, an employee or third-party agency.
- ✗ Complaints that have already been brought to the attention of, and are being investigated by, the police.
- ✗ Complaints where legal action is being taken.
- ✗ Fundraising complaints against charities which are only registered in Scotland. To see if a charity is registered in Scotland you can search the [Scottish Charity Register](https://www.oscr.org.uk/about-charities/search-the-register/register-search/).¹

(1) <https://www.oscr.org.uk/about-charities/search-the-register/register-search/>

Complaints and investigations

Between 1 September 2018 and 31 August 2019 we received 737 complaints, which is a 33% reduction on the previous year. Of these 737 complaints, 41% were not within our remit and a further 36% came to us prematurely.

In 2017/18 nearly 40% of the complaints we received were not within our remit and 44% came to us prematurely.

We completed 82 investigations and in 49 of these we identified a breach of the code. In these cases we made recommendations for improvement, unless the organisations had already taken action in response to the events complained about. In a number of cases, we asked the organisations involved to apologise to the complainant.



Fig 3 (right): No of complaints and investigations 2018/19

Giving organisations an opportunity to resolve complaints

In all but exceptional cases (for example, where there are serious public interest or safety implications) we ask complainants to raise their concern with the relevant fundraising organisation directly in the first instance, as organisations should have in place processes for complaints handling. This is often the quickest way to resolve a complaint and for organisations to identify learning.

36% of the complaints we received in 2018/19 were premature, meaning they were not ready for us to consider because they had not yet been put to the organisation(s) complained about by the complainant. This is a reduction from 44% in 2017/18. We aim to maintain this trend.

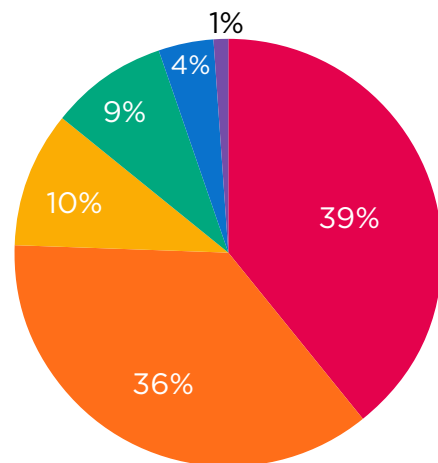
Out of remit complaints

When we receive complaints that are not in remit, we try where possible to signpost complainants to other organisations who may be able to help them.

The highest proportion of out of remit complaints in 2018/19 were signposted to the Charity Commission for England and Wales and Action Fraud. In 10% of complaints, as shown in the chart, we signposted complainants to other organisations - this included local authorities, the Housing Ombudsman or the Local Government Ombudsman.

The figures in the rest of this report exclude the out of remit complaints received.

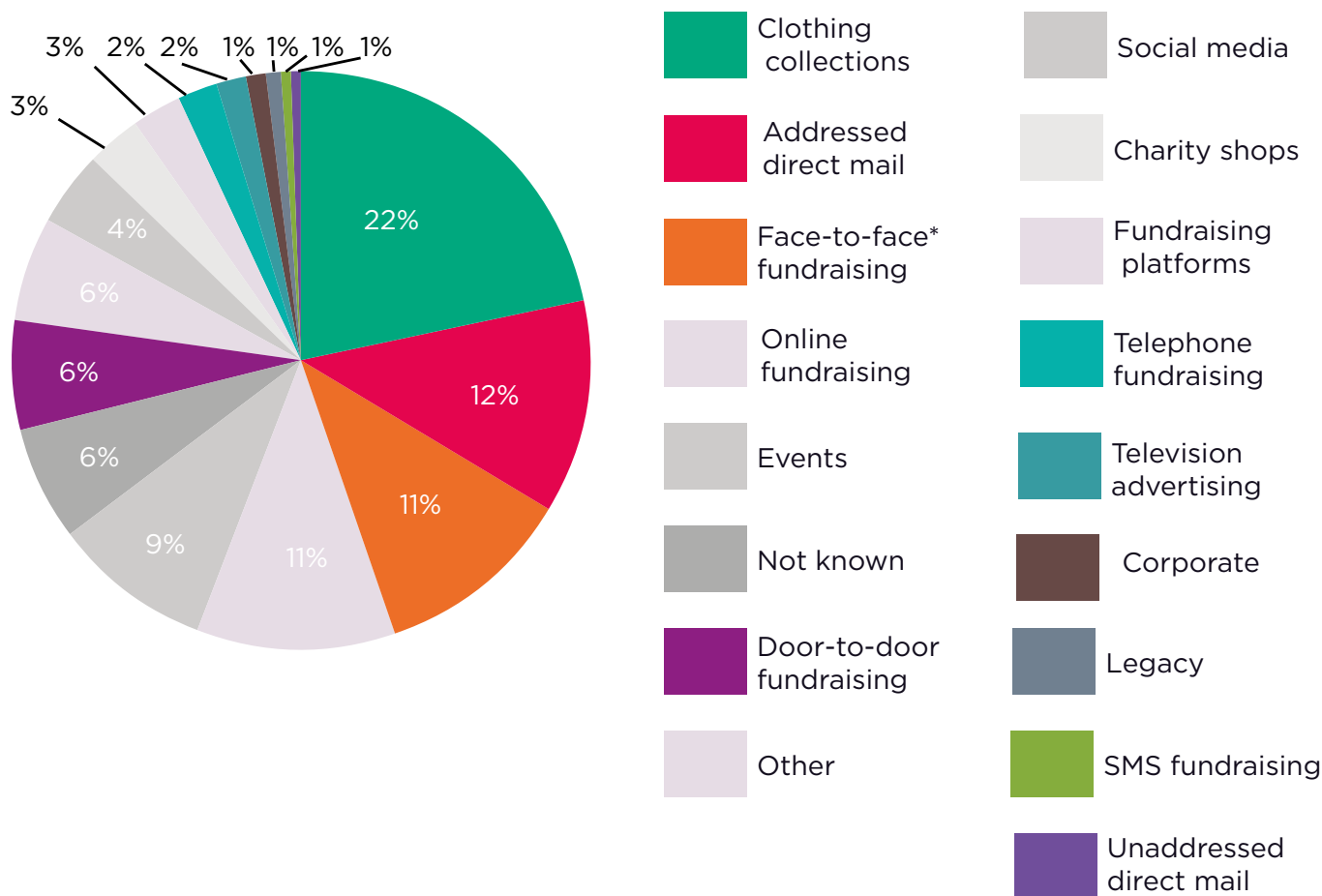
Fig 4 (right): Signposting to other organisations in out of remit complaints



What people are complaining about

The most commonly complained about methods of fundraising in our casework were clothing collections, addressed direct mail, face-to-face fundraising and online fundraising. Addressed direct mail was also frequently complained about to charities – see pages 17-18 for a breakdown of the most common complaints made to charities.

Fig 5 (below): Fundraising methods most complained about to the Fundraising Regulator



*Includes private site and street fundraising

Themes from our investigations

Of the 82 investigations we completed during 2018/19, the following themes emerged as some of the most frequently raised concerns:

- 20 (24%) related to the treatment of vulnerable donors
- 18 (22%) related to misleading information in fundraising communications
- 11 (13%) related to 'no charity bag' signs on properties not being observed

Similar to 2017/18, we identified a cross-cutting theme relating to a failure by organisations to deal effectively with complaints. 62 (76%) of our investigations looked at concerns about complaints handling in addition to the main substantive points of the complaint. This is unsurprising given that we ask people to complain to the charity directly first.

The use of misleading information and complaints about collection bags were also two of the top themes we investigated in 2017/18.

Safeguarding vulnerable people

Fundraisers will inevitably come into contact with people in vulnerable circumstances. The code is clear that all reasonable steps must be taken to treat donors fairly, to take into account the needs of any possible donor who may be in vulnerable circumstances, and to never exploit the trust, lack of knowledge, apparent need for care and support or vulnerable circumstance of any donor at any time. We recognise that the sector has worked hard to address concerns in this area that existed at the time we were established in 2016.

Safeguarding vulnerable people

Investigation summary

The complainant's late mother, who lived in extra care accommodation, was regularly contacted before her death by charities seeking donations. The complainant felt that their mother may not have been able to make informed decisions about her charitable giving, and that the amount of contact may have placed undue pressure on her to donate. The complainant named 18 different charities in their complaint.



We asked the relevant charities for information about their contact with the complainant's mother and investigated if there was any evidence they had placed her under undue pressure. We also considered whether any of the charities had concerns about her capacity to give.

We found that in most cases the complainant's mother had made contact with the charity after receiving unaddressed mailings and magazine inserts. In other cases she had a pre-existing relationship with the charity. In a handful of cases, the charities had bought her contact details from a third party. We found that all the charities had respected the donor's communication preferences and that there was no evidence that she was put under pressure to give. We also found that there was no reason for the charities to suspect that she was not capable of making her own decisions to donate.

Why was this case important?

Despite finding no breach of the code on the part of the charities involved in this case, it raises several important issues.

- The case echoes long-standing systemic problems related to the treatment of people in vulnerable circumstances, which is one of the reasons why the Fundraising Regulator was established in 2016.
- The case highlights the difficulties charities face in knowing when a donor or potential donor is in vulnerable circumstances.
- The investigation shows the importance of good record keeping in evidencing the treatment of donors. We found all 18 charities were clearly able to demonstrate they had consent to contact the person concerned, as well as when the consent was obtained, and if the donor's preferences had been changed at any time.
- The case also underlines the difficulties charities face in knowing the cumulative effect of multiple charities contacting a donor (in this case, through magazine inserts).

Outcome

We are conducting a review of the information available to charities on safeguarding people in vulnerable circumstances. We will publish guidance in this area in 2020.

Misleading information

Concerns that a charity's fundraising communications are misleading to donors has remained a consistent reason for complaints to be made to us in 2018/19. Although we have upheld some of these complaints, we have found that there is often no intention to mislead on the part of the charity, and the information provided to donors before they donate is appropriate to allow them to make an informed decision. The Advertising Standards Agency has produced [advice](#)² in this area, which charities should follow.

(2) <https://www.asa.org.uk/advice-online/misleading-advertising.html>

Misleading information

Investigation summary

The complainant told us that the charity says in its adverts that it is "always there" to help. However, the complainant believed that the charity's services were a "postcode lottery" and not available for everyone. They had concerns that people donating to the charity were being misled by the suggestion that the charity's services were available everywhere. The complainant first complained to the charity but remained dissatisfied.

We found that there was no evidence that the charity was suggesting that its services were physically available to all those affected by the charity's cause. In fact, we found that the charity was clear when fundraising that it provides a variety of services, some in person, and others either online or on the telephone. We also found that the charity had responded appropriately to the complaint.

Learning

Charities must give potential donors adequate information about where their donation will go on their fundraising materials, to allow them to make an informed decision.



Clothing collections

Although the sector reported a significant fall in the number of complaints about clothing collections in 2018/19, this was the most complained about method of fundraising in complaints that we handled. The most frequent cause of these complaints was a collection bag being delivered against the householder's express wishes. We are increasingly seeing a concern among members of the public in relation to the environmental impact of the plastic collection bags that are distributed.

Clothing collections

Investigation summary

The complainant said that a clothing collection bag was delivered to their home by a third-party agency working on behalf of the charity despite having a 'no charity bags' sign on their front door. First, they complained to the charity and agency directly but remained unhappy, so brought the complaint to us.

We found that the agency should not have delivered the collection bag to the complainant's property and in doing so did not act respectfully.



Clothing collections

We also found that the agency did not respond appropriately to the complaint. We found that the charity was not making all reasonable efforts to ensure the ongoing compliance of its agency with the code.

Both the charity and agency committed to our recommendations for improvement in this case. These related to the delivery of the collection bag, the charity's monitoring and oversight of its agency, and complaints handling.

Learning

This case highlights the importance of charities, or third-party agencies fundraising on their behalf, respecting the wishes of householders when delivering collection bags. Charities must ensure that their contract with their third party includes provisions to enable them to effectively monitor the activities they are carrying out on their behalf, and ensure that this monitoring takes place. This must include appropriate oversight of complaints handling.



Complaints handling

Of the 82 investigations we completed, complaints handling was a theme in 62 (76%) of them. We expect this to be a recurring theme every year due to the nature of our complaints process, as we tend to only investigate cases once the charity or fundraising organisation has been given the opportunity to resolve the issue directly with the complainant.

Although we saw some examples of good complaints handling among these, we did find a breach of the code relating to complaints handling in 37 of these 62 cases (60%). We encourage organisations to view complaints as a useful way of receiving feedback from those they are interacting with, and to use the learning from them to continually improve their fundraising practices.

Complaints handling

Investigation summary

The complainant was concerned about the conduct of agency fundraisers working on behalf of the charity on a high street. The complainant said that the fundraisers used aggressive fundraising techniques. He also told us that he was unhappy with the charity's response to his complaint as it was "substantially content-free."

We found that the charity did not properly investigate and respond to the complaint, and in doing so it did not act respectfully. We also found that in failing to appropriately investigate the complaint, the agency had not identified all the relevant learning to ensure this did not happen again. Both the charity and its agency committed to reviewing the learning from this complaint to improve their complaints handling.

Learning

The code requires charities and third-party fundraising organisations to have in place an effective complaints handling process. This case highlights the importance of having a clear and publicly available complaints procedure. Organisations must investigate complaints fairly, proportionately and without undue delay. You can find out more about handling complaints appropriately in our [guidance](#).¹

(1) <https://www.fundraisingregulator.org.uk/more-from-us/resources/complaints-handling-guidance>



The Fundraising Preference Service (FPS)

The Code of Fundraising Practice specifies that charities must stop sending direct marketing communications to individuals after a request has been received from them not to. Continuing to contact someone is a breach of the code.

In the past year, 2,820 members of the public made 8,719 suppression requests against 846 charities. In the six months to August 2019, we named 72 charities as breaching the code in relation to FPS on our website. As of the end of this reporting period, 37 charities had breached the code and failed to access 89 requests.

We investigated four complaints relating to the FPS in this reporting period and upheld all of them. This is the same number of investigations as the previous year but represents a smaller proportion of the overall number of charities who have received suppression requests from individuals via the FPS.

Fundraising Preference Service

Investigation summary

The complainant said that they used the Fundraising Preference Service (FPS) to request that the charity stop sending their mother direct marketing. But despite this request, their mother continued to receive three further mailings from the charity.



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We contacted the charity and it confirmed that it had undertaken an internal investigation into the complaint which had revealed a problem in its processes. This meant the charity had received the complainant's FPS request but there had been a delay in updating its records, meaning further mailings had been sent that should not have been. The same error had affected a further 82 individuals who were sent direct marketing against their wishes, in breach of the code.

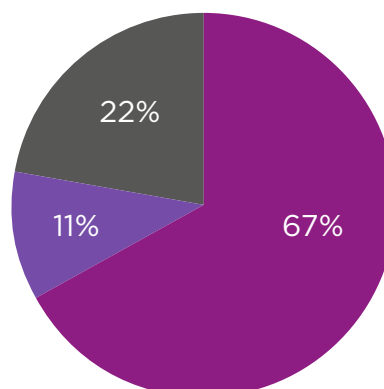
The charity apologised for the "unacceptable oversight" and took action to address the problem and committed to undertaking further system checks in the future.

Who we are investigating

This chart shows the breakdown of how many of those we investigate either pay the Fundraising Levy or are registered with us, or are neither in the levy nor registered with us. Charities within our levy spend a minimum of £100,000 per year on fundraising. Charities that spend less than this can pay £50 per year to register with us.

Although many of our investigations involve organisations that either pay our levy or are registered with us, this chart shows that a considerable number of our investigations relate to organisations that are not.

Fig 6 (right): the type of organisations we investigate



- Organisations who pay our levy
- Organisations who are registered with us
- Organisations who are neither in our levy nor registered with us

This was also the case in 2017/18. It is important to note that our regulation includes all charitable organisations that fundraise in the UK, and the costs of that regulation are borne by those who pay the levy and are registered with us. We strongly encourage those organisations that are not registered to do so, so that they demonstrate their commitment to the fundraising standards and share the cost of regulation.

Escalated complaints

Our Complaints and Investigations Committee oversees the casework that we undertake. Where necessary, it considers a small number of individual cases. Cases can be referred to the committee for a number of reasons, including: multiple complaints about the same issue and/or charity; novel or contentious issues in the case; wider or systemic issues within the complaint; or where we consider there is a risk to public safety and trust in charity fundraising more generally.

Full investigation report: International Liberty Association

We published a full investigation report on our website following our investigation into this organisation due to the seriousness of the concerns identified and to highlight the recommendations we made for improvement. It is important to highlight the potential risk that the charity's fundraising approach posed to the public, and the need for effective trustee oversight and control of volunteers when charities of all sizes fundraise. The full report can be found [on our website](#).¹

We opened an investigation into International Liberty Association in January 2018, having received eight complaints from members of the public about the charity's fundraising practices. The complaints focused on visits made by volunteers from the charity to members of the public in their homes, during which donations were sought. Concerns were raised that the volunteers placed significant and undue pressure on potential donors – some of whom were vulnerable people – to donate substantial sums. In several cases, we were told that the volunteer fundraisers had suggested that the donors obtain a loan in order to facilitate a donation.

We obtained evidence from the charity, including its own complaints log, and met with two of its trustees to discuss the complaints we had received. We found that the charity's fundraising operation was lacking in appropriate oversight from the trustees and carried a high risk to both the charity and potential donors. We saw no evidence to show that volunteers were aware of the need to comply with the code.

We acknowledged the passion and dedication of the volunteers, but were concerned that their closeness to the cause and the fundraising method used, involving private meetings with people in their own homes, exposed the charity and the public to a level of risk that was not being appropriately mitigated or managed by the trustees.

Although we considered that the charity's policy on vulnerable people was broadly in line with good practice, we saw evidence to show that this was not always being followed by its volunteers. In one case, a volunteer continued to seek donations from a vulnerable person against their wishes and instructions from the police.

We were also concerned by evidence that the trustees had been made aware of potential problems with volunteers but had failed to appropriately investigate or take action in relation to the serious issues that had been raised by complaints.

We noted several changes to the charity's processes that the trustees made during the course of our investigation to address the issues we raised, and made several further recommendations to the charity. The charity cooperated with our investigation throughout and agreed to comply in full with our recommendations.

(1) <https://www.fundraisingregulator.org.uk/more-from-us/resources/decision-international-liberty-association>

Investigations that we discontinued

On rare occasions we close an investigation without issuing a decision. In this reporting period this occurred on three occasions, for example where there is an ongoing police investigation into a complaint.

Compliance with our recommendations

We are pleased to report that for the most part, organisations responded positively to our recommendations for improvement and complied with these in full. In two cases where a charity did not comply, we referred them to the Charity Commission for England and Wales as the statutory regulator.

Requests for external review

Decisions made by us are final and are not subject to appeal. However, parties to a complaint may request an external review if they can show that one or more of the following criteria are met:

- we have refused to reopen an investigation in response to new evidence;
- there was a problem in the process by which our decision was made; or
- it is alleged that our decision is unreasonable and not one we could sensibly have made on the basis of all the relevant facts.

In this reporting period a case was referred to the independent external reviewer for the first time. The external reviewer partially upheld the complaint.

External review

We passed the following case to our independent external reviewer following our investigation into a charity and its agency, in which we made findings against both organisations. This case presents some useful learnings for our own complaints handling. More information on this case can be found [on our website](#).¹

The complaint

Our original investigation found that the agency delivered a clothing collection bag on behalf of a charity against the express wishes of the householder. We also found breaches of the code relating to the handling of the complaint, learning from previous complaints and the charity's monitoring of its agency. The charity requested an external review of our decision and provided new evidence to support its request.

What the external reviewer found

The external reviewer found that we provided the charity and its agency with sufficient opportunity to meet our evidential requirements, and that they did not provide enough operationally-generated evidence in support of their position. However, they commented that we could have been more directive in setting out the types of evidence we were looking for.

The external reviewer found that some of the breaches we had identified in our investigation were sustainable. However, they found that we had attached too much weight to the complainant's evidence, and should have sought further evidence from them, particularly as key facts were disputed by the charity and its agency. The reviewer found that our decision-making hinged on an insufficiently-reasoned preference for the complainant's evidence, and that this was unfair. They also found that we conflated the charity and agency's denials of wrongdoing with a refusal to learn lessons.

(1) <https://www.fundraisingregulator.org.uk/more-from-us/resources/external-review-our-casework>

External review

How we put it right

In line with the external reviewer's recommendations, we undertook the following actions to learn from this review:

- A member of staff and Board member not involved in the original investigation reviewed our decision in light of the external reviewer's findings. We issued a revised decision to all parties.
- We reviewed our handling of contested evidence and produced an action plan which was presented to our Complaints and Investigations Committee.
- We met with the charity and agency to reflect on better ways of working together in the future.

Our Vice Chair separately considered a further two requests for external review but found that the criteria had not been met in these cases. Our Vice Chair did, however, find in one of the cases that we had not been sufficiently clear in one of our investigation summaries about our findings and recommended that we make changes to our process. We now share investigation summaries with all parties to the complaint along with our final decision, and invite them to comment on the factual accuracy of these prior to publication.

Naming the organisations we investigate

In October 2018, we took the decision to name all organisations we investigate in our published investigation summaries, whether the complaint is upheld or not. Organisations have been named in all closed investigations into complaints received on or after 1 March 2019.

We think it is right that we name all the organisations we investigate so that we promote and support a culture of ethical fundraising. This allows the public, donors and potential donors to make informed decisions when they choose to donate to charity, and ensures we are transparent in our investigations process. Naming the organisations we investigate also brings our work in line with that of other regulators, such as the Charity Commission for England and Wales. However, our approach differs in that we name organisations once an investigation has concluded, rather than at the outset.

In September 2019 we published the first set of investigation summaries in which we named the organisations we investigated. We have included more detail than we previously have in investigation summaries with the aim of making them more useful for the public and the organisations we regulate. You can read our investigation summaries [on our website](#).³

Working with other regulators

We continue to be mindful of the wider regulatory landscape in which we operate, and share information with other regulators in line with our memoranda of understanding where applicable.

For example, in 2018/19 we referred organisations to the Charity Commission for England and Wales when we had concerns relating to governance. We also liaised with bodies such as the Information Commissioner's Office and the Advertising Standards Authority where we have casework in common.

(3) <https://www.fundraisingregulator.org.uk/complaints/investigations>

Part two: Complaints reported by the charity sector

For our 2016 report, we compiled data from fundraising organisations that were registered with us and spending more than £100,000 per year on fundraising, to understand the complaints they had received.

We repeated this exercise in 2017/18 and 2018/19. However, for both these years we reduced the number of charities that we gathered information from 893 to 58, to focus on the charities which spend £5 million or more per year on fundraising.

These 58 organisations represent a significant proportion of all complaints handled by the sector. They each submitted their data to us on complaints they had received over the course of the reporting year via our Annual Complaints Return.

Table 1: Sample sizes of the Complaints Reports

Complaints Report	Reporting period covered	Sample size
2016	January 2016 - December 2016	893 charities (no of respondents to our survey of charities spending more than £100,000 per year on fundraising)*
2017/18	April 2017 - March 2018	58 charities (of the 893 charities that submitted data for the 2016 report, identified as spending more than £5 million per year on fundraising)
2018/19	April 2018 - March 2019	58 charities (the same charities that submitted data for the 2017/18 report)

*The Fundraising Regulator was launched in July 2016. In May 2017, we requested complaints data from the charities that fell within the first year of our voluntary levy of charities spending £100,000 or more per year on fundraising. At that time, the levy for 1 September 2016 to 31 August 2017 was based on data submitted by charities as part of the annual return to the Charity Commission for England and Wales for the year ending 31 December 2014. We received responses from 893 charities of different sizes.

Key findings

The key findings below are compared to figures reported in 2017/18. See table 2 for a year-on-year comparison of all complaints by fundraising method.



Addressed direct mail

Complaints rose by 19%, from 4,709 to 5,619, with 55 organisations reporting complaints on this method (previously 57).



Door-to-door fundraising

Complaints decreased by 22% from 5,239 to 4,094, with 25 organisations reporting complaints on this method (previously 29).



Outdoor events

Complaints rose by 43% from 1,439 to 2,054, with 32 organisations reporting complaints on this method (previously 30).



Online advertising

Complaints have fallen by 16% from 1,517 to 1,278, with 26 organisations reporting complaints on this method (previously 30).



Private site fundraising

Complaints have risen by 27% from 968 to 1,226, with 35 organisations reporting complaints on this method (previously 28).



Clothing collections

Complaints about clothing collections have fallen by 55% from 2,478 to 1,110, with 6 organisations reporting complaints on this method (previously 9).



Email fundraising

Complaints about fundraising by email have fallen by 15% from 1,277 to 1,080, with complaints on this method reported by 39 charities (previously 44).



Social activities

Complaints about social activities have risen by 17% from 577 to 677, with complaints on this method reported by 16 charities (previously 17).



Telephone fundraising

Complaints have decreased by 33% from 820 to 550, with 41 organisations reporting complaints on this method (previously 36).



Raffles

Complaints have decreased by 4% from 542 to 518, with 23 organisations reporting complaints on this method (previously 20).

Overview of complaints reported by charities

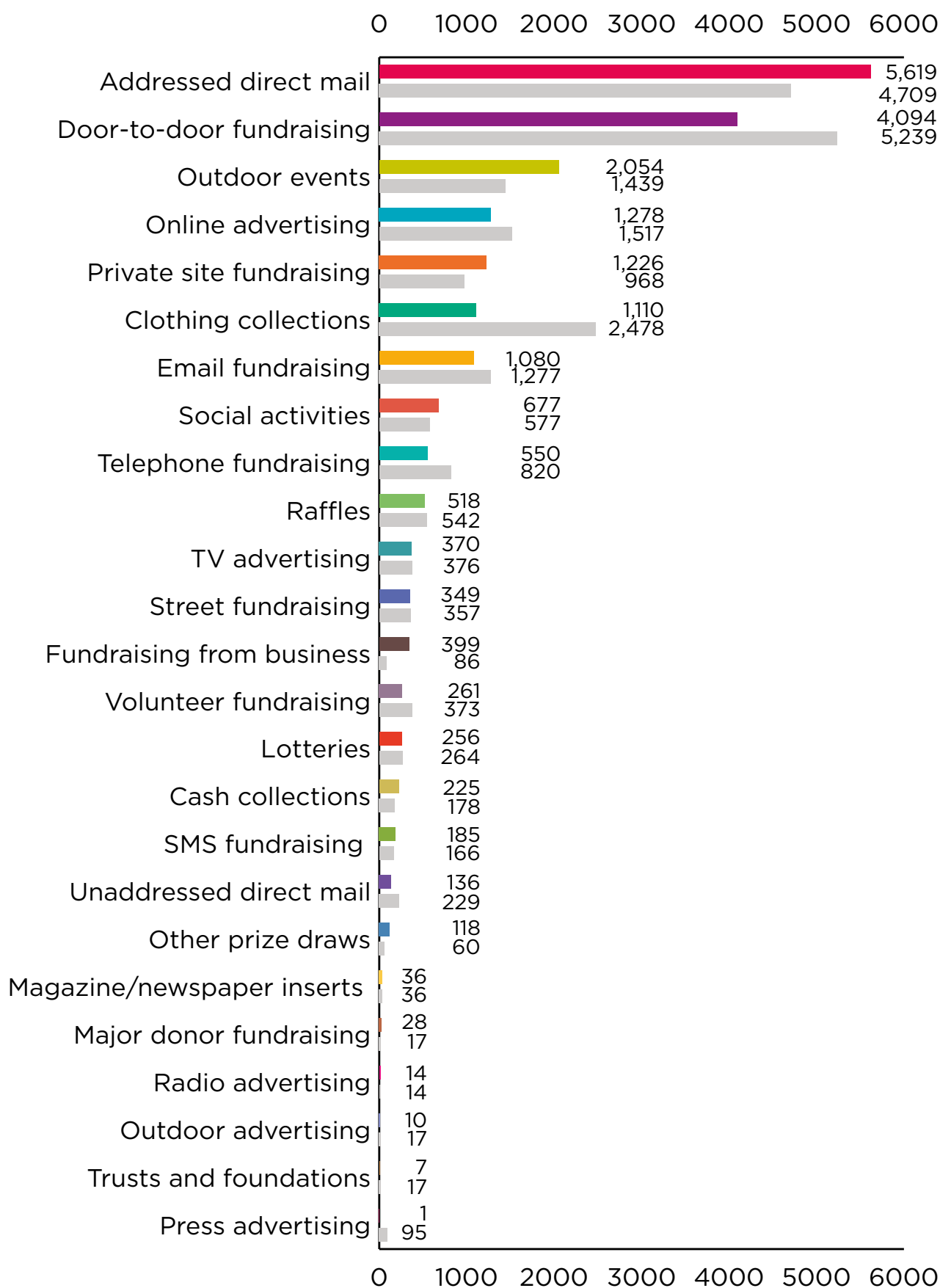
The total number of complaints reported by the 58 charities was 20,541, which is 6% lower than reported in 2017/18 (21,851). There were 25 methods of fundraising reported about.

Table 2: All complaints by fundraising method

Method		Total no of complaints reported		Change in complaints reported from 17/18		No of organisations reporting complaints		
		2018/19	2017/18	+/-	%	2018/19	2017/18	+/-
1	Addressed direct mail	5,619	4,709	910	19.3%	55	57	-2
2	Door-to-door fundraising	4,094	5,239	-1,145	-21.9%	25	29	-4
3	Outdoor events	2,054	1,439	615	42.7%	32	30	2
4	Online advertising	1,278	1,517	-239	-15.8%	26	30	-4
5	Private site fundraising	1,226	968	258	26.7%	35	28	7
6	Clothing collections	1,110	2,478	-1,368	-55.2%	6	9	-3
7	Email fundraising	1,080	1,277	-197	-15.4%	39	44	-5
8	Social activities	677	577	100	17.3%	16	17	-1
9	Telephone fundraising	550	820	-270	-32.9%	41	36	5
10	Raffles	518	542	-24	-4.4%	23	20	3
11	Television advertising	370	376	-6	-1.6%	24	29	-5
12	Street fundraising	349	357	-8	-2.2%	11	14	-3
13	Fundraising from business	339	86	253	294.2%	17	12	5
14	Volunteer fundraising	261	373	-112	-30.0%	21	17	4
15	Lotteries	256	264	-8	-3.0%	26	26	0
16	Cash collections	225	178	47	26.4%	15	12	3
17	SMS fundraising	185	166	19	11.4%	16	18	-2
18	Unaddressed direct mail	136	229	-93	-40.6%	17	13	4
19	Other prize draws	118	60	58	96.7%	5	4	1
20	Magazine/newspaper inserts	36	36	0	0.0%	11	8	3
21	Major donor fundraising	28	17	11	64.7%	9	9	0
22	Radio advertising	14	14	0	0.0%	6	6	0
23	Outdoor advertising	10	17	-7	-41.2%	6	6	0
24	Trusts and foundations	7	17	-10	-58.8%	6	7	-1
25	Press advertising	1	95	-94	-98.9%	1	6	-5

For most fundraising methods, there has been a decrease in complaints reported. However, complaints about addressed direct mail, outdoor events, private site fundraising, social activities, fundraising from business, cash collections, SMS fundraising, other prize draws and major donor fundraising have increased since last year.

Fig 7: Year-on-year comparison of complaints by fundraising method



Direct and non-direct marketing

The total number of complaints about direct and non-direct marketing is very similar between 2017/18 (9,256) and 2018/19 (9,279). Many areas saw a decrease in complaints, but there was a 19% increase in addressed direct mail and an 11% increase in SMS fundraising complaints.

Fig 8: No of complaints for direct and non-direct marketing

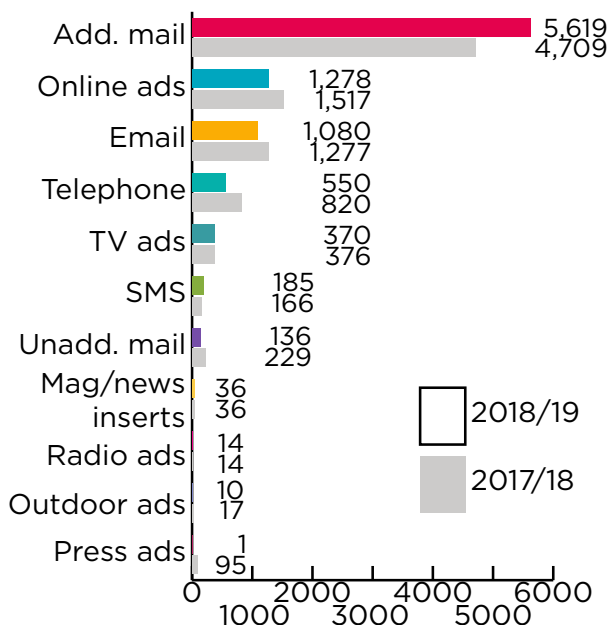
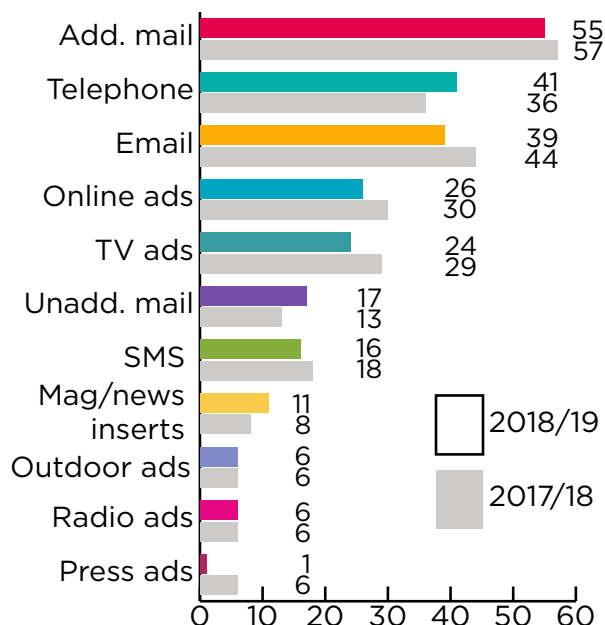


Fig 9: No of charities reporting complaints about direct and non-direct marketing



Public collections

There has been a significant fall in the number of complaints about door-to-door fundraising (22%) and clothing collections (55%). Conversely, there has been a rise in complaints about private site fundraising (27%) and cash collections (26%). These figures are reflected in the number of organisations who reported complaints on these topics.

Fig 10: No of complaints about public collections

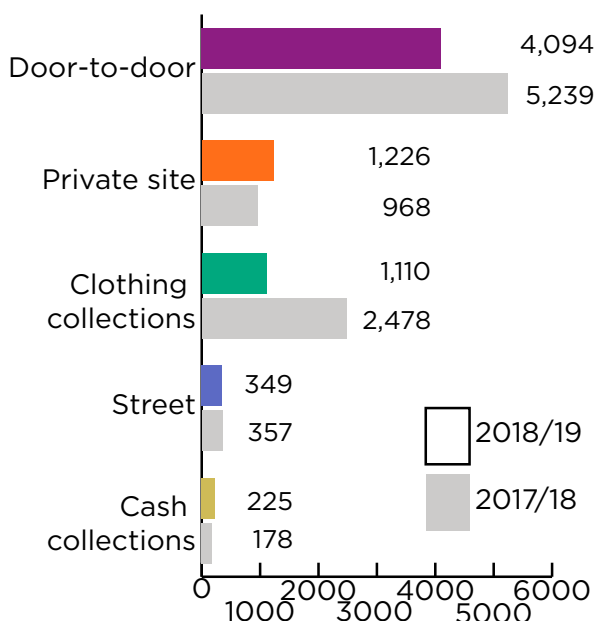
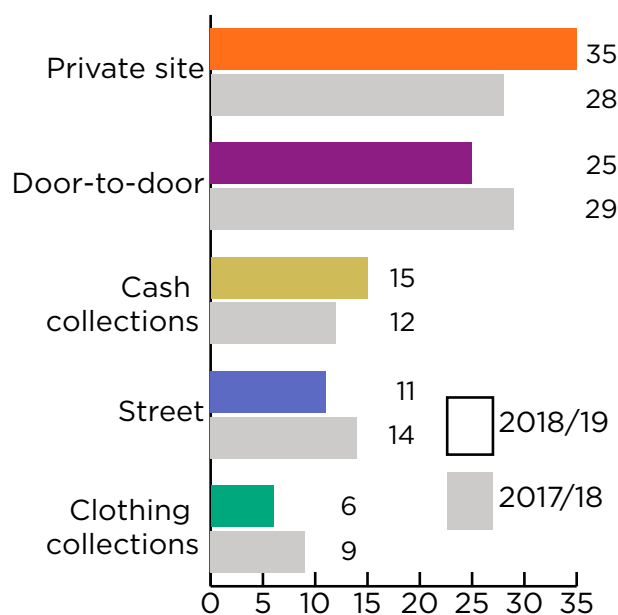


Fig 11: No of charities reporting complaints about public collections



Lotteries, raffles and other prize draws

Complaints about raffles and lotteries have fallen slightly from 2017/18. However, the figures show a near 100% increase in the number of complaints about 'other prize draws'. Examples of this category include tombolas, prize competitions and free-to-enter draws.

Fig 12: No of complaints about lotteries, raffles and other prize draws

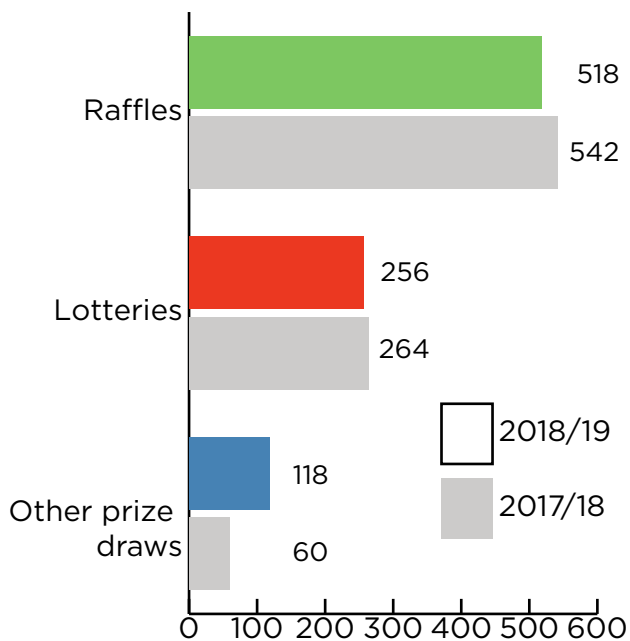
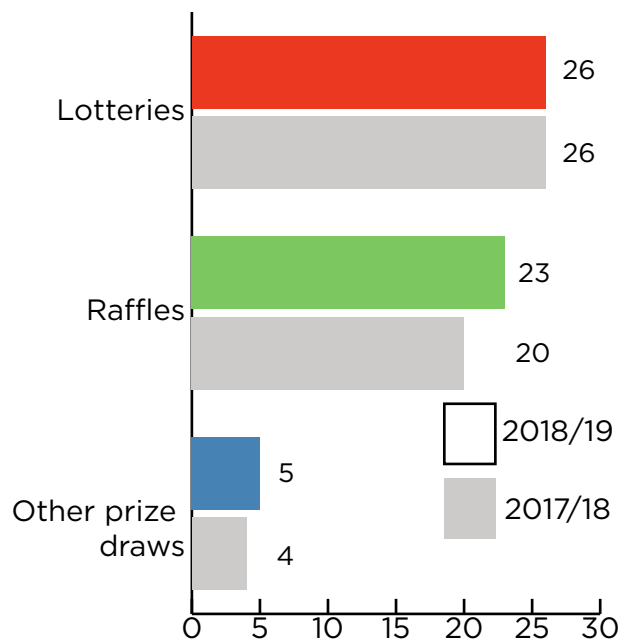


Fig 13: No of charities reporting complaints about lotteries, raffles and other prize draws



Events

There has been a significant increase (43%) in complaints about outdoor events, a 17% increase in complaints about social activities and a decrease of 30% about volunteer fundraising. The number of organisations reporting these complaints remains similar to last year.

Fig 14: No of complaints about event fundraising

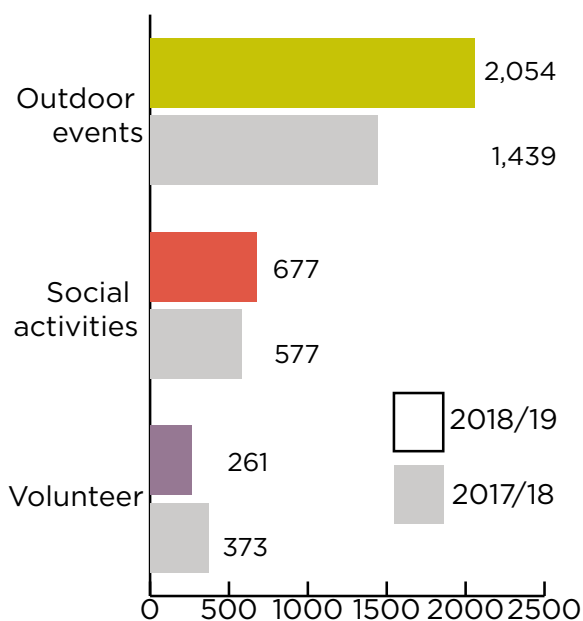
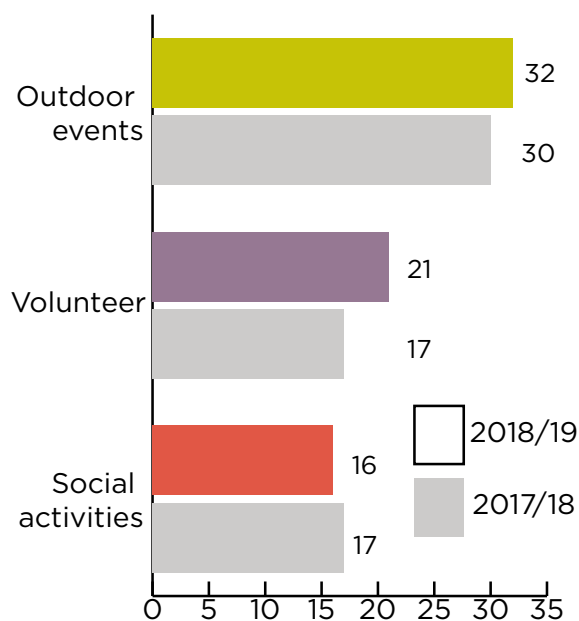
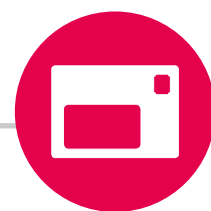


Fig 15: No of charities reporting complaints about event fundraising



Analysis of reported complaints by fundraising method

The following section provides further information on the type of fundraising complaints reported for particular fundraising methods, comparing data from 2017/18 and 2018/19.



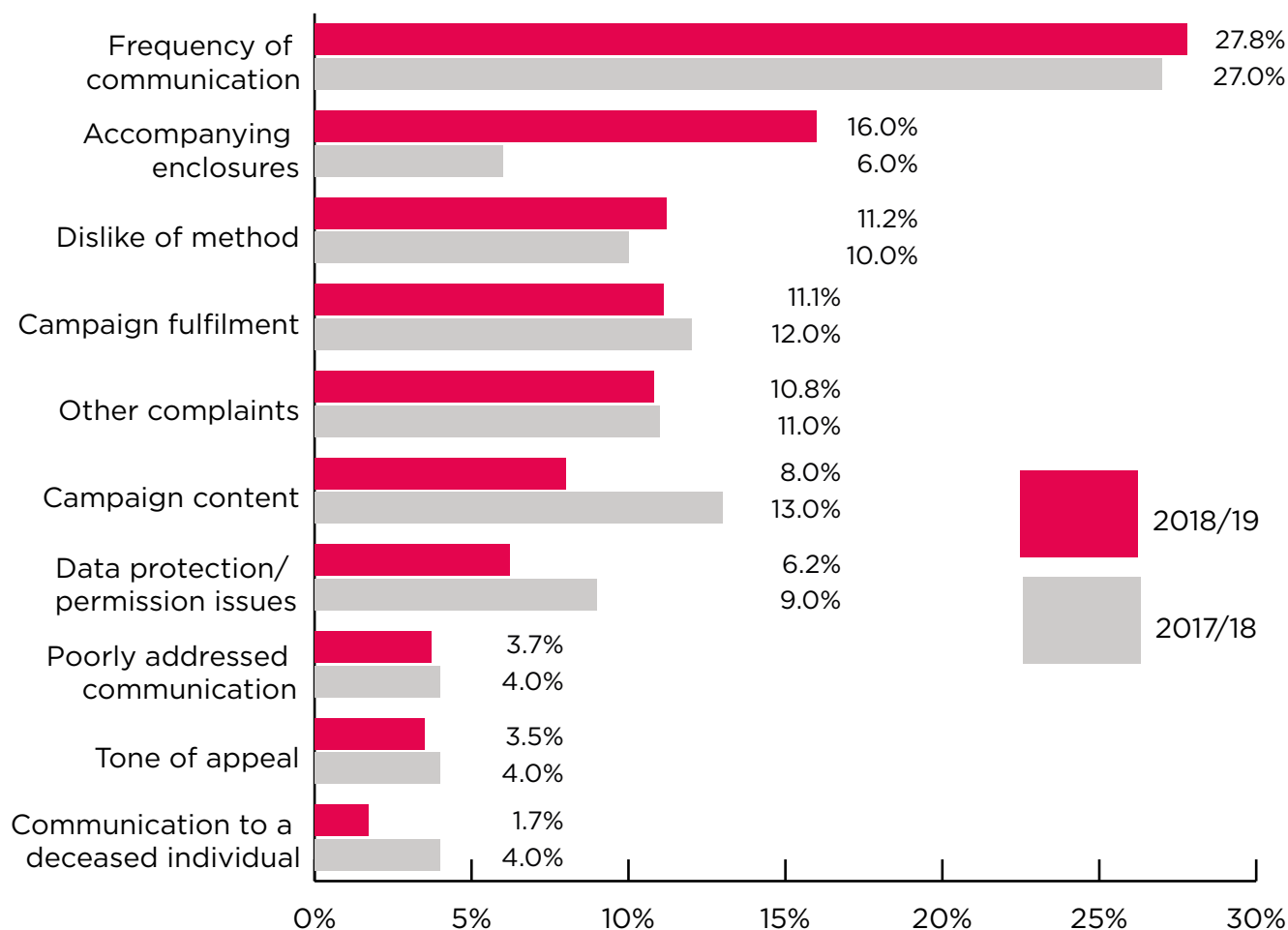
Addressed direct mail

Complaints about addressed direct mail increased by 19% from 4,709 to 5,619 even though the number of mailed items sent by charities significantly decreased. Frequency of communication remains the most commonly reported complaint. There has been a slight fall in complaints on data protection/permission issues and campaign content, and a significant rise in complaints about accompanying enclosures.

Table 3: Overview of addressed direct mail complaints

	2018/19	2017/18
No of organisations reporting complaints about addressed direct mail	55	57
Percentage of organisations reporting complaints	95%	98%
No of addressed direct mail items sent by organisations reporting complaints	78,624,313	98,488,876
Total no of complaints reported	5,619	4,709
Ratio of complaints to addressed mail items*	1:13,993	1:20,915

Fig 16: Type of complaint - addressed direct mail



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.



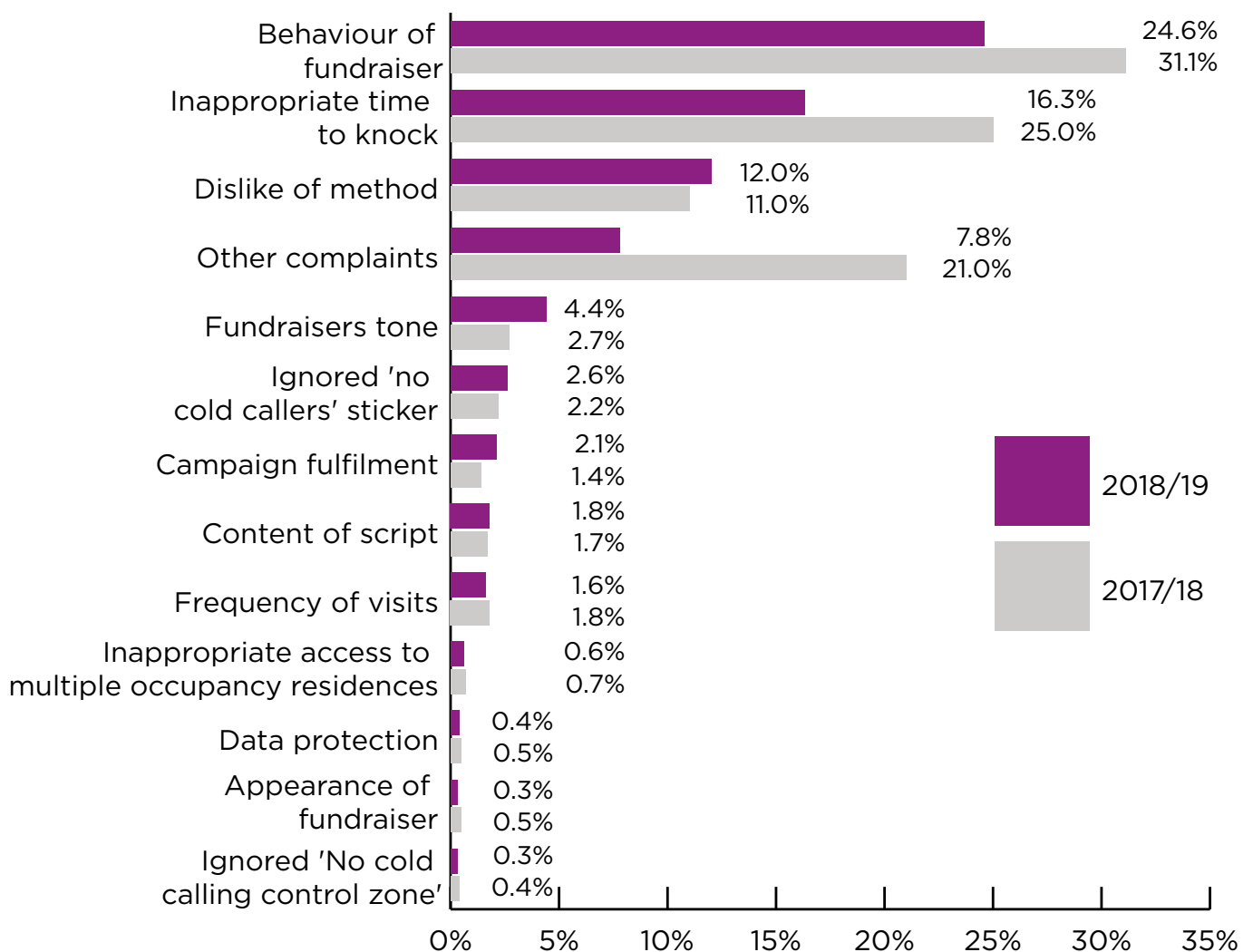
Door-to-door fundraising

Complaints about door-to-door fundraising have fallen by 22%. The number of organisations that received a complaint about this method also decreased and the number of contacts with the public using this method fell by 12%. Behaviour of fundraisers and knocking on doors at an inappropriate time remain the two most reported types of complaint, but both have fallen from 2017/18.

Table 4: Overview of door-to-door fundraising complaints

	2018/19	2017/18
No of organisations reporting complaints about door-to-door fundraising	25	29
Percentage of organisations reporting complaints	43%	50%
No of contacts by organisations reporting complaints	24,526,886	27,859,076
Total no of complaints reported	4,094	5,239
Ratio of complaints to contacts*	1:5,991	1:5,318

Fig 17: Type of complaint - door-to-door fundraising



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.



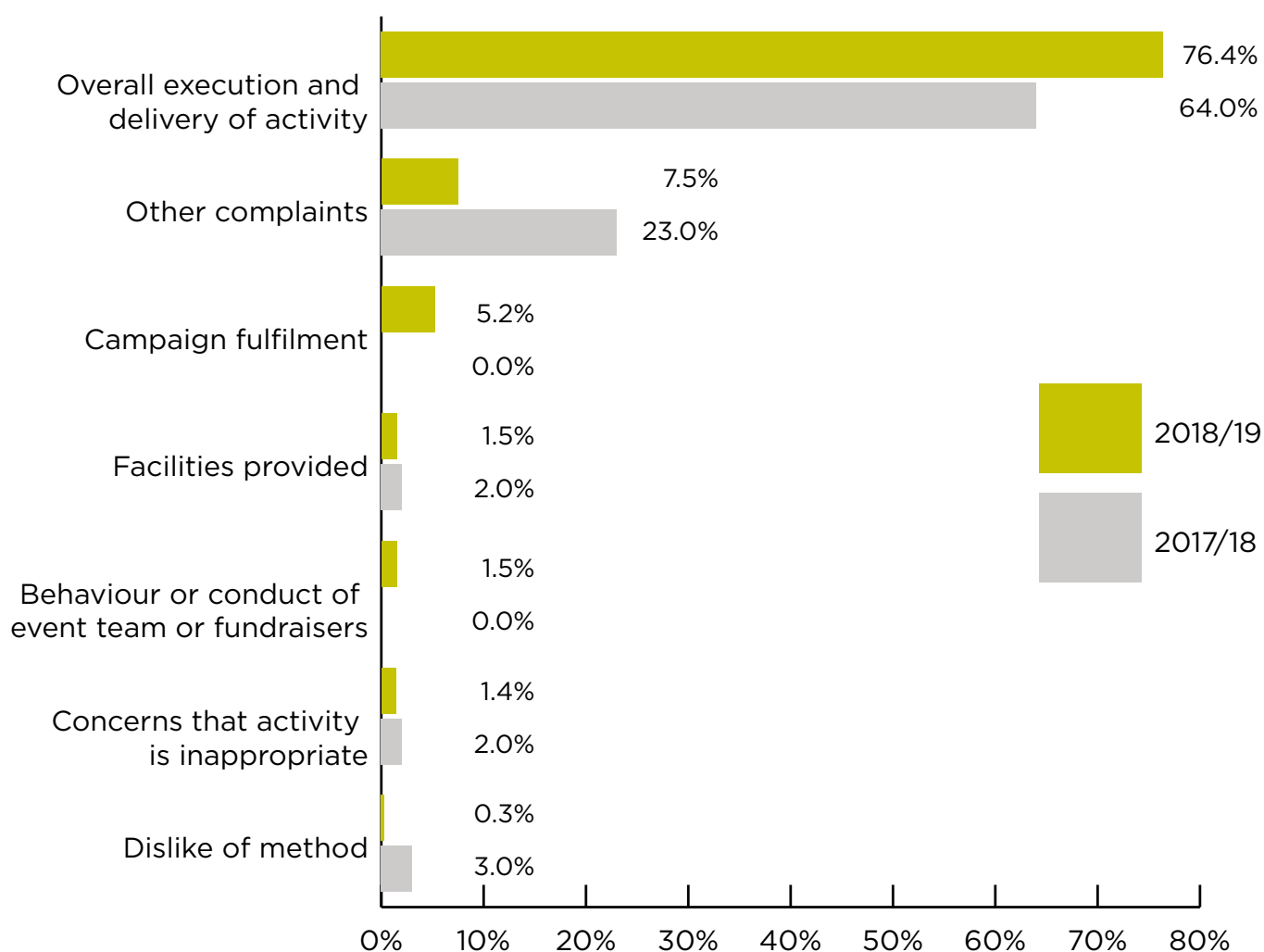
Outdoor events

There has been a significant rise (43%) in complaints about outdoor events. By far, the most frequently reported type of complaint remains the execution and delivery of the outdoor event and this rose by 12% between 2017/18 and 2018/19. (We did not collect data about complaints made because of campaign fulfilment and behaviour or conduct in 2017/18).

Table 5: Overview of outdoor events complaints

	2018/19	2017/18
No of organisations reporting complaints about outdoor events	32	30
Percentage of organisations reporting complaints	55%	52%
No of outdoor event participants reported by organisations reporting complaints	6,111,257	5,426,827
Total no of complaints reported	2,054	1,439
Ratio of complaints to outdoor event participants*	1:2,975	1:3,771

Fig 18: Type of complaint - outdoor events



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.



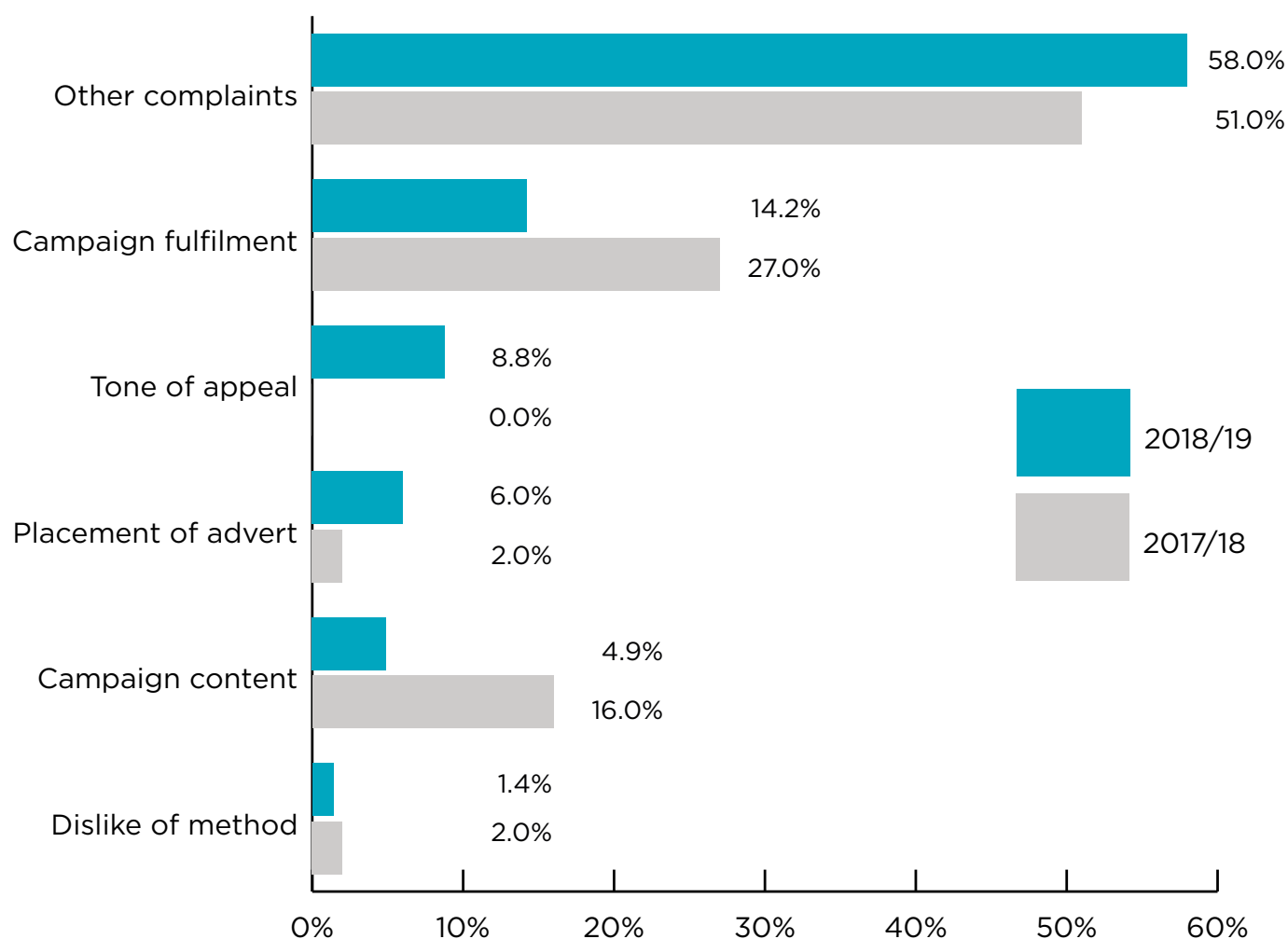
Online advertising

The number of online advertising complaints has fallen by 16%. Fewer organisations reported complaints about this fundraising method even though the reach of these organisations slightly increased. There was a significant fall in complaints about campaign fulfilment and campaign content, and a rise in placement of advert and tone of appeal.

Table 6: Overview of online advertising complaints

	2018/19	2017/18
No of organisations reporting complaints about online advertising	26	30
Percentage of organisations reporting complaints	45%	52%
No of adverts from organisations reporting complaints	2,977,252,116	2,848,427,586
Total no of complaints reported	1,278	1,517
Ratio of complaints to adverts*	1:2,329,618	1:1,877,671

Fig 19: Type of complaint - online advertising



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.



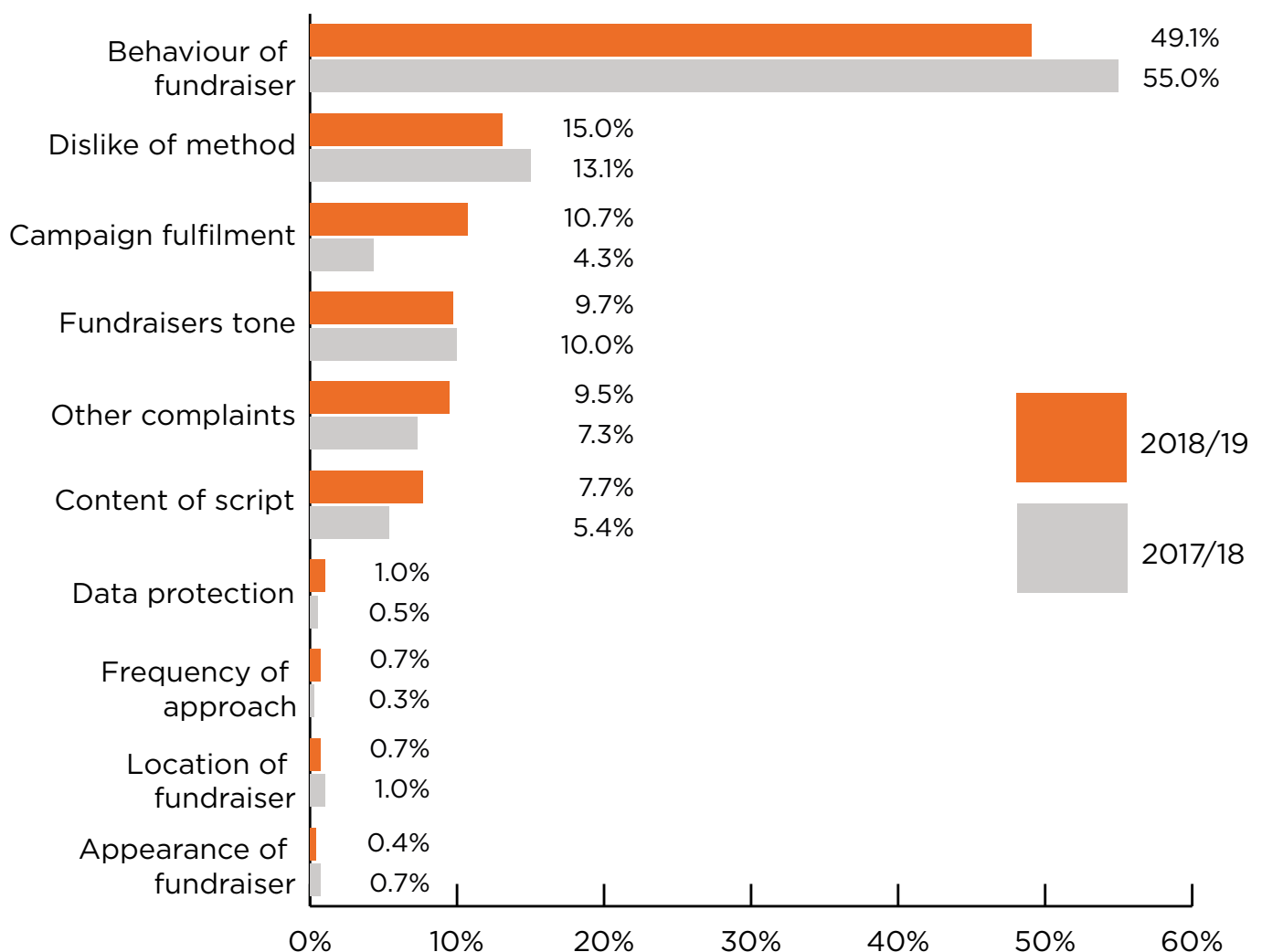
Private site fundraising

Complaints about fundraising on private sites has risen by 27% from 968 to 1,226, as has the number of organisations reporting complaints for this fundraising method. However, the number of sign-ups from private site face-to-face fundraising has fallen, which has resulted in a higher ratio of complaints to sign-ups. The main theme of complaints continues to be about the behaviour of the fundraiser which accounts for around half of complaints, and there was a significant increase in complaints about campaign fulfilment.

Table 7: Overview of private site fundraising complaints

	2018/19	2017/18
No of organisations reporting complaints about private site fundraising	35	28
Percentage of organisations reporting complaints	60%	48%
No of sign-ups by organisations reporting complaints	525,319	584,557
Total no of complaints reported	1,226	968
Ratio of complaints to sign-ups*	1:428	1:604

Fig 20: Type of complaint - private site fundraising



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.



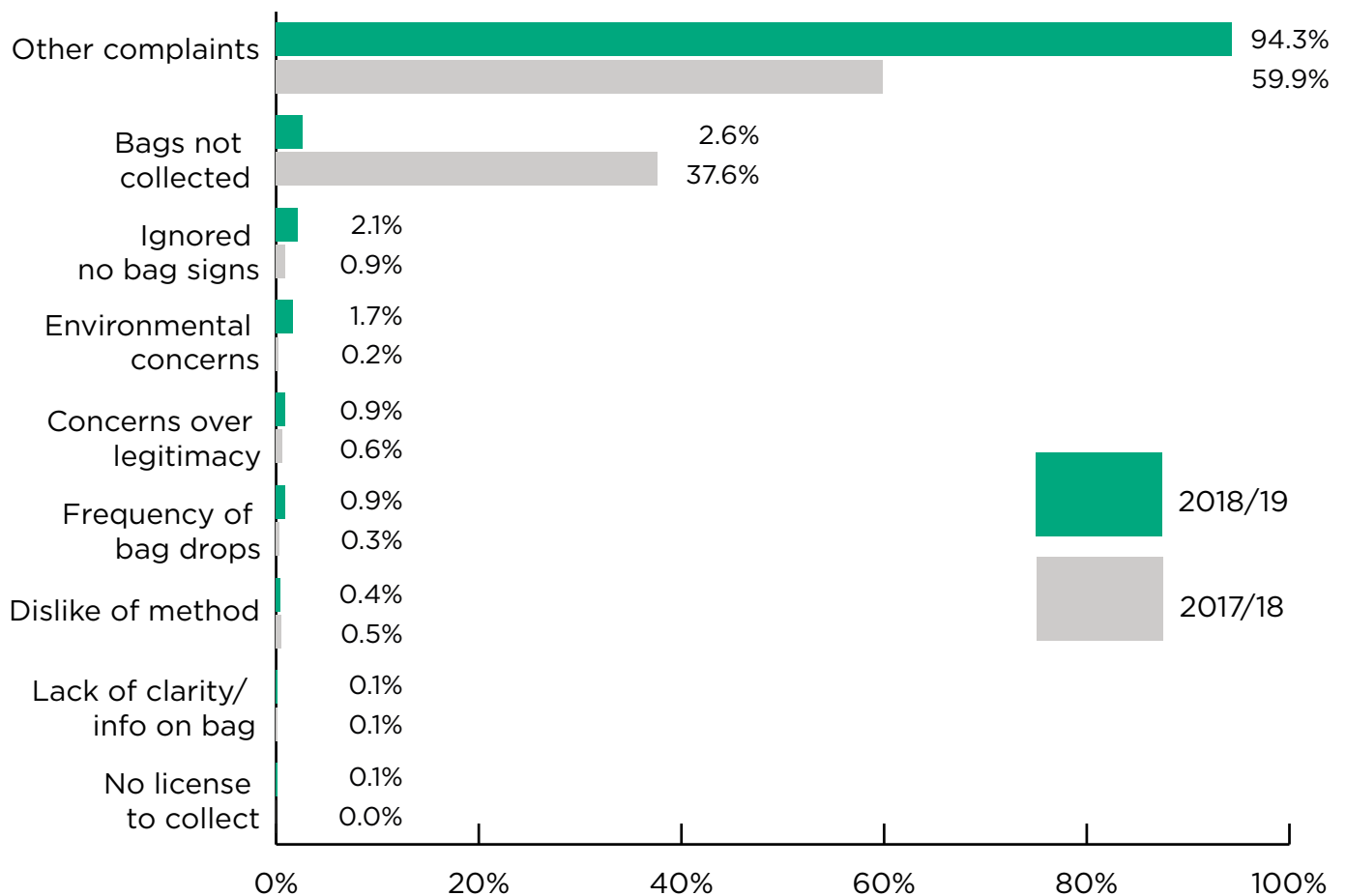
Clothing collections

Complaints about clothing collections have fallen by 55% from 2,478 to 1,110. Organisations that reported a complaint fell by a third. Although there has been a four-fold rise in the number of clothing bags being distributed, the ratio of complaints to contacts has fallen dramatically from 1 in 1,797 bags distributed to 1 in 18,232 bags.

Table 8: Overview of clothing collection complaints

	2018/19	2017/18
No of organisations reporting complaints about clothing collections	6	9
Percentage of organisations reporting complaints	10%	16%
Total no of bags distributed by organisations reporting complaints	20,237,585	4,452,890
Total no of complaints reported	1,110	2,478
Ratio of complaints to clothing bags distributed*	1:18,232	1:1,797

Fig 21: Type of complaint - clothing collections



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.



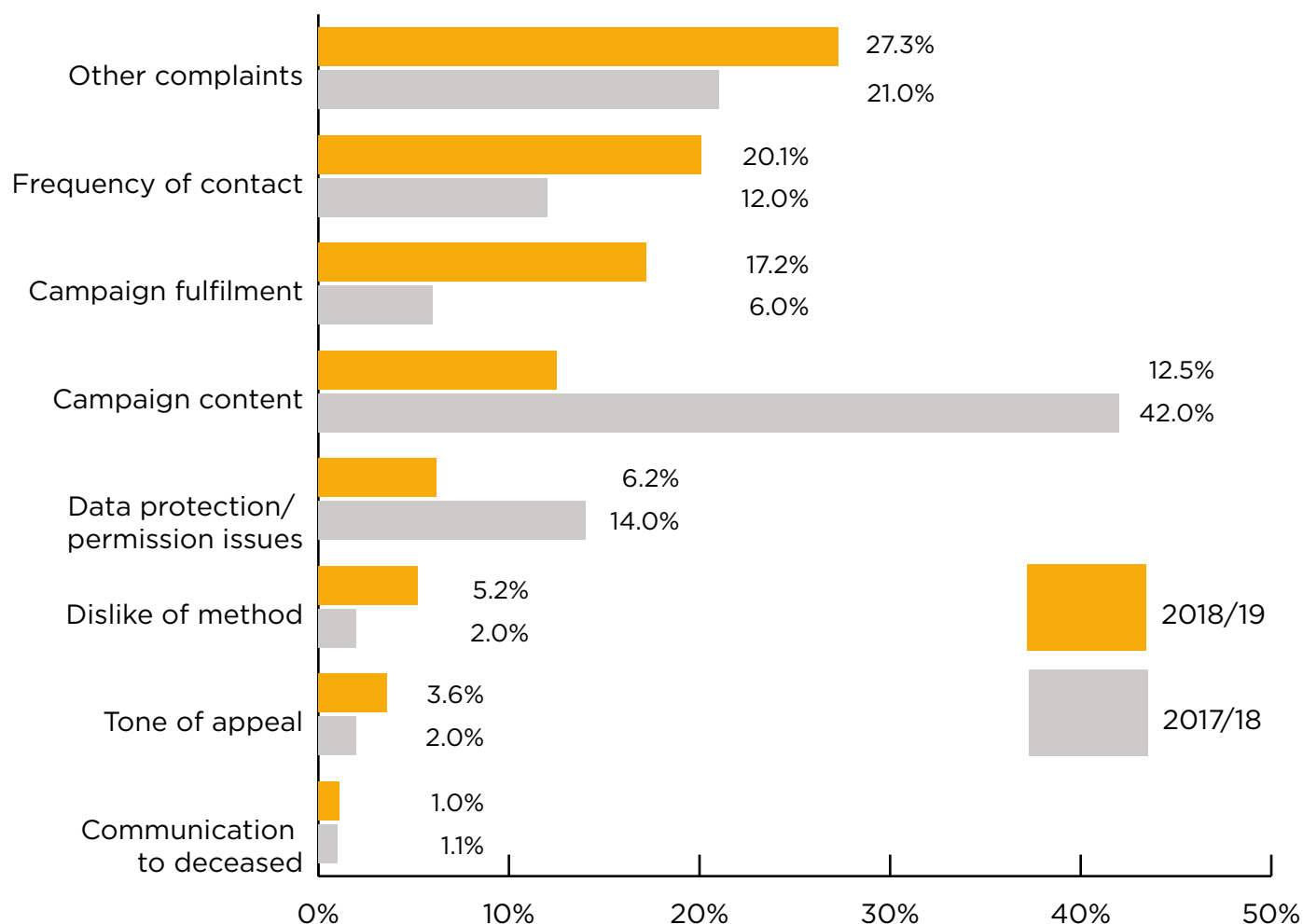
Email fundraising

Complaints about fundraising by email have fallen by 15% since last year and the number of organisations reporting this type of complaint has also fallen. The number of emails sent by these organisations has significantly decreased, which accounts for the ratio of complaints to contacts increasing. Although there has been a significant drop in the number of complaints about campaign content and data protection issues, there has been a rise in complaints about frequency of contact and campaign fulfilment.

Table 9: Overview of email fundraising complaints

	2018/19	2017/18
No of organisations reporting complaints about email fundraising	39	44
Percentage of organisations reporting complaints	67%	76%
No of emails sent by organisations reporting complaints	96,730,770	144,949,101
Total no of complaints reported	1,080	1,277
Ratio of complaints to contacts*	1:89,566	1:113,508

Fig 22: Type of complaint – email fundraising



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.



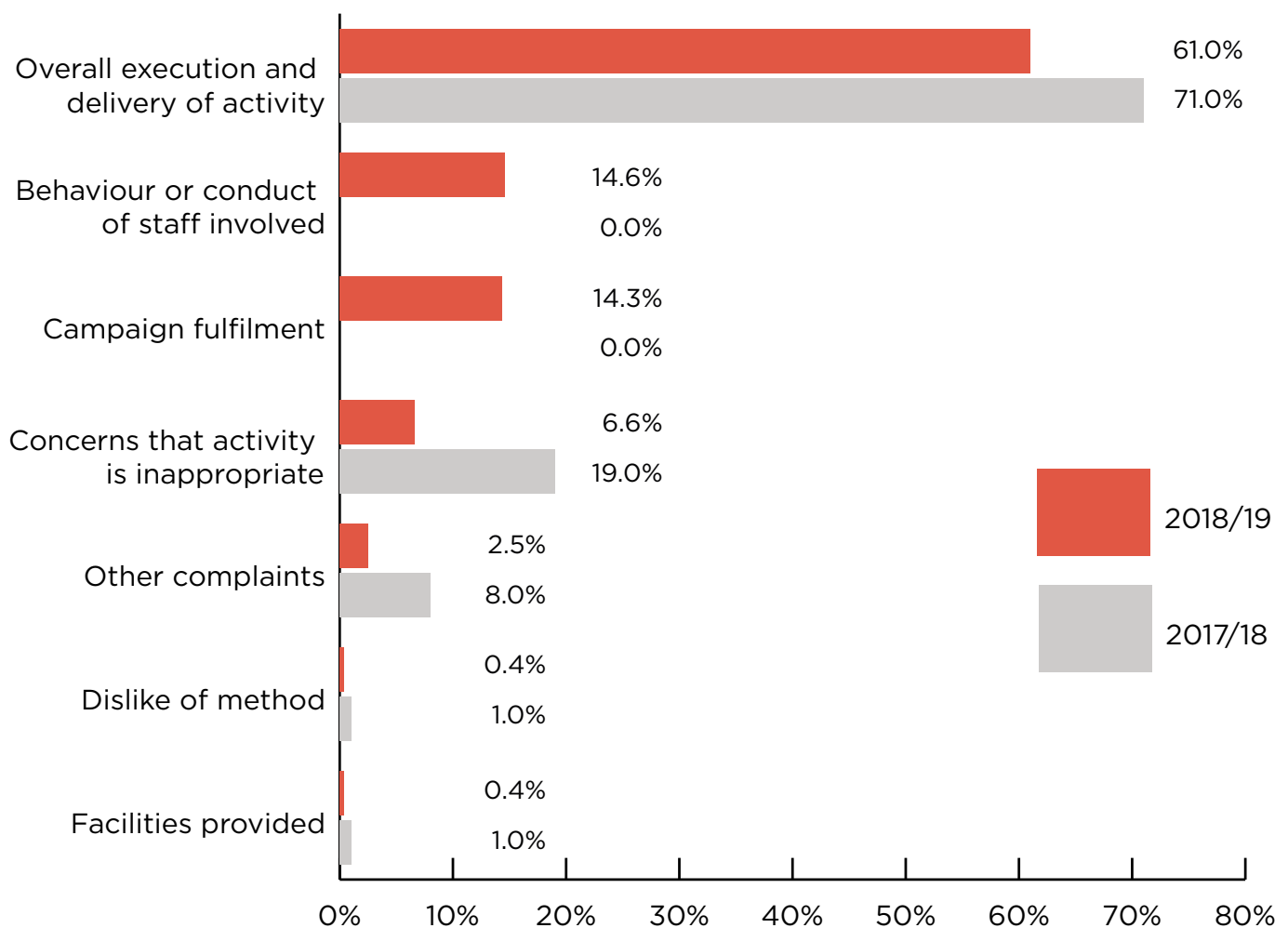
Social activities

Complaints about social activities have risen by 17% from 577 to 677, but the number of organisations reporting these complaints remains similar. The numbers of tickets sold for social activities slightly increased. Complaints about execution of activity and social activity being inappropriate have both have fallen significantly. (We did not collect data about complaints made because of campaign fulfilment and behaviour or conduct in 2017/18).

Table 10: Overview of social activities complaints

	2018/19	2017/18
No of organisations reporting complaints	16	17
Percentage of organisations reporting complaints	28%	29%
No of tickets sold by organisations reporting complaints	470,119	421,710
Total no of complaints reported	677	577
Ratio of complaints to tickets sold*	1:694	1:731

Fig 23: Type of complaint - social activities



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.



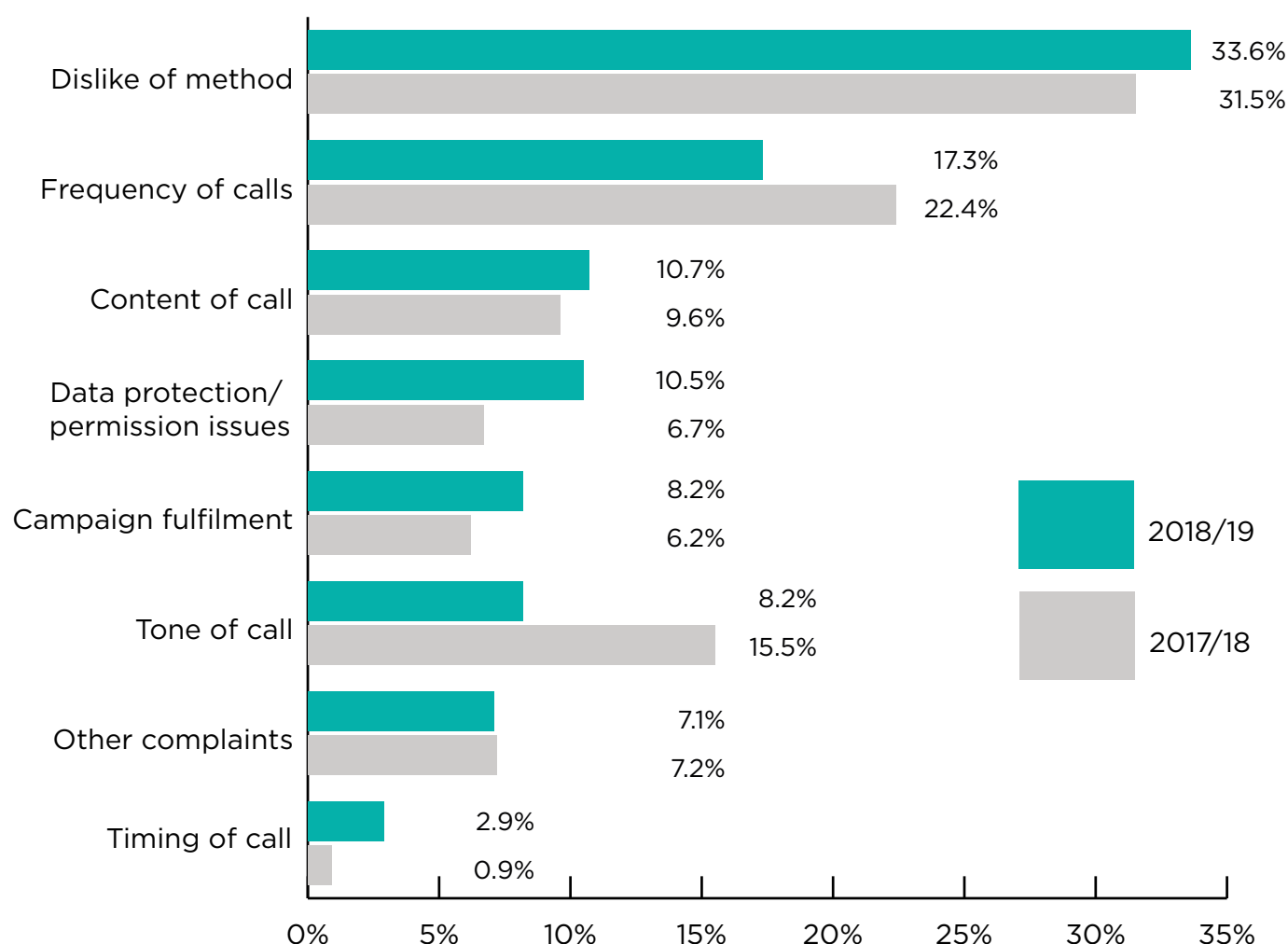
Telephone fundraising

Complaints about telephone fundraising have decreased by 33% from 820 to 550. However, the number of organisations reporting these complaints increased from 36 to 41. Whilst there has been a significant fall in the number of people called, the number of complaints has not fallen as dramatically. Therefore, the ratio of complaints to calls has increased. Dislike of the method remains the main reason for complaints, and complaints about the frequency of calls and tone of the call have dropped significantly.

Table 11: Overview of telephone fundraising complaints

	2018/19	2017/18
No of organisations reporting complaints about telephone fundraising	41	36
Percentage of organisations reporting complaints	71%	62%
No of people called by organisations reporting complaints	2,161,525	8,598,201
Total no of complaints reported	550	820
Ratio of complaints to number of people called*	1:3,930	1:10,486

Fig 24: Type of complaint - telephone fundraising



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.



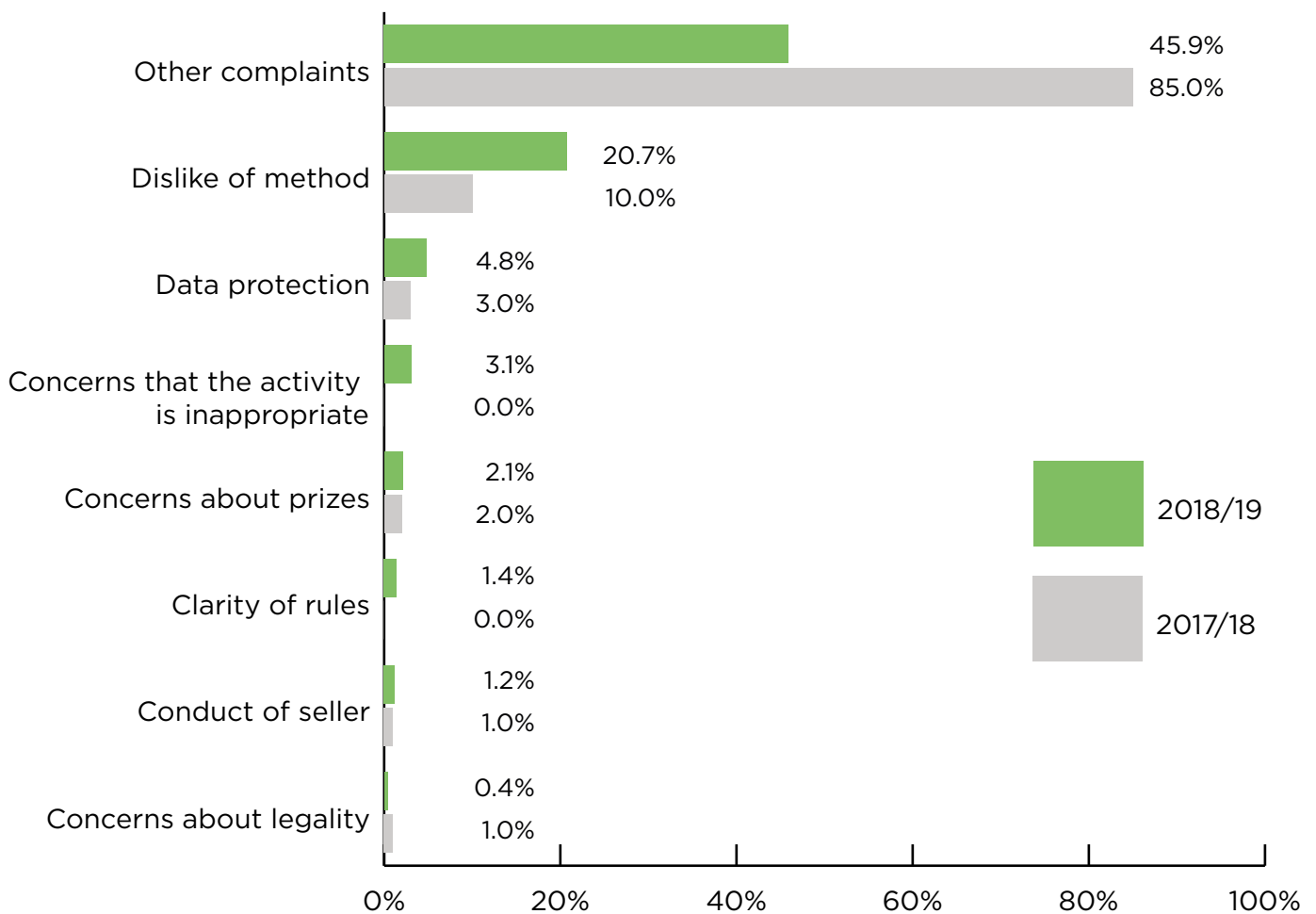
Raffles

Complaints about raffles have fallen slightly (4%). There has been an increase in the number of organisations reporting complaints about raffles and an increase in the number of tickets sold by those organisations that reported these complaints. There has been a significant increase in the number of complaints from people who dislike this method of fundraising.

Table 12: Overview of raffle complaints

	2018/19	2017/18
No of organisations reporting complaints about raffles	23	20
Percentage of organisations reporting complaints	40%	34%
No of raffle tickets sold by organisations reporting complaints	20,002,813	18,452,131
Total no of complaints reported	518	542
Ratio of complaints to number of tickets sold*	1:38,615	1:34,045

Fig 25: Type of complaint - raffles



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.



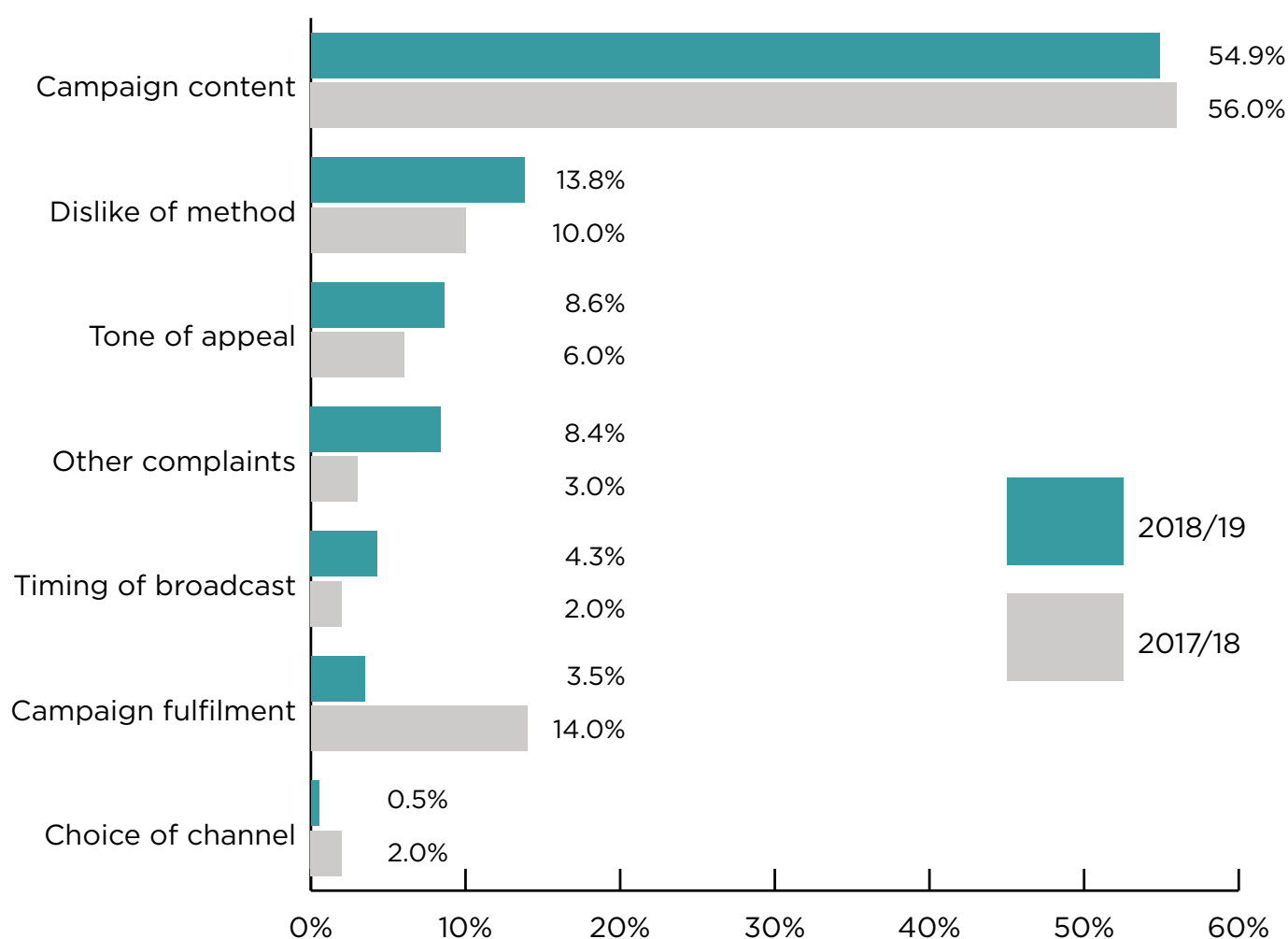
Television advertising

Complaints about television advertising remain steady, with 376 in 2017/18 and 370 in 2018/19. There has been a drop in complaints related to television advertising campaign fulfilment. Complaints about campaign content remains the most recorded type of complaint at 55%, however the majority of other categories of complaints have seen an increase.

Table 13: Overview of television advertising complaints

	2018/19	2017/18
No of organisations reporting complaints about television advertising	24	29
Percentage of organisations reporting complaints	41%	50%
Total television advertising audience reach by organisations reporting complaints	6,206,130,906	6,084,962,686
Total no of complaints reported	370	376
Ratio of complaints to television advertising audience reach*	1:16,773,327	1:16,183,411

Fig 26: Type of complaint - television advertising



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.



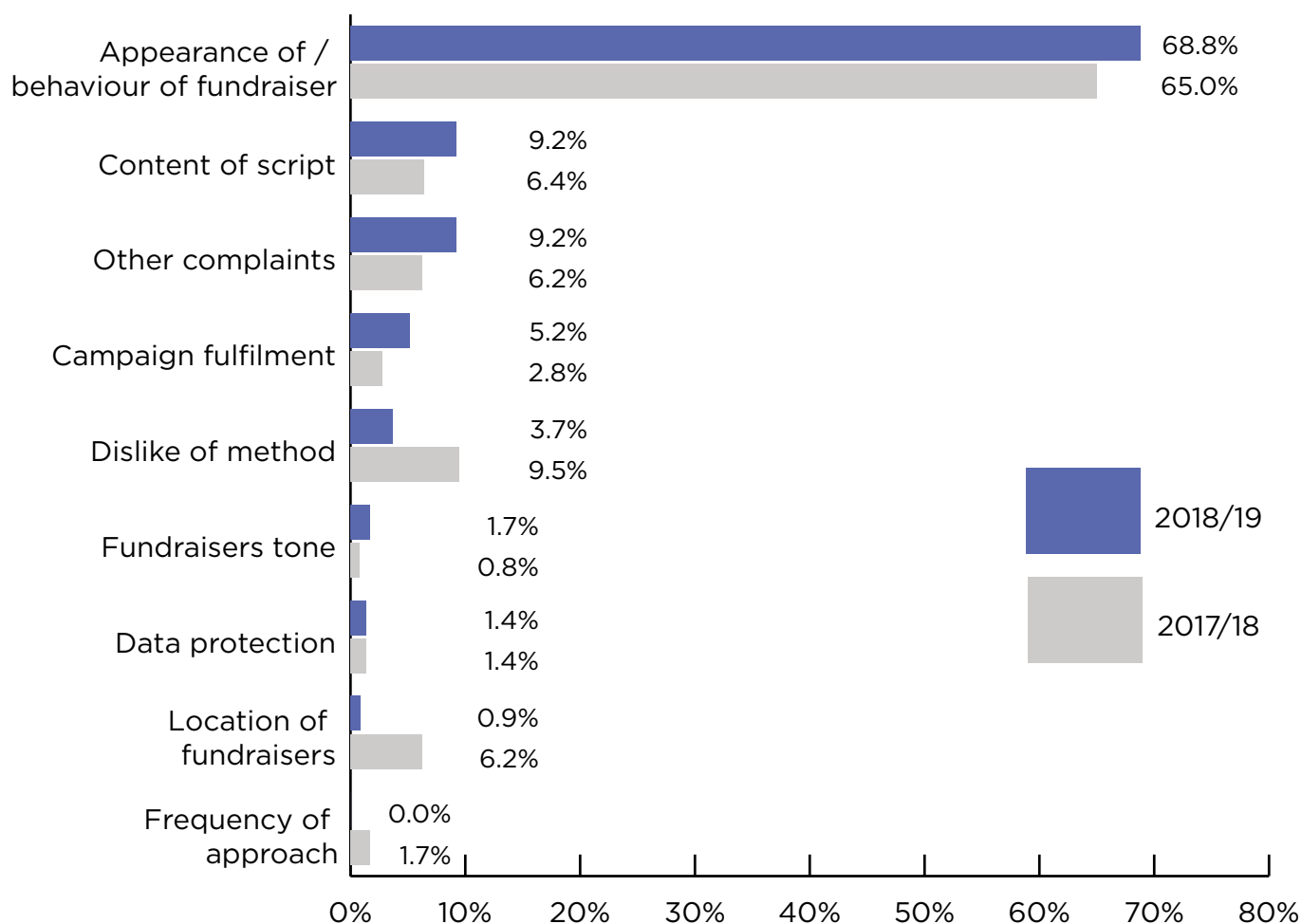
Street fundraising

The number of complaints and the number of organisations that reported a complaint remains relatively consistent. The appearance or behaviour of fundraisers remains the most reported complaint about this fundraising method, accounting for over two thirds of complaints. There has been a drop in the number of people complaining because they dislike street fundraising.

Table 14: Overview of street fundraising complaints

	2018/19	2017/18
No of organisations reporting complaints about street fundraising	11	14
Percentage of organisations reporting complaints	19%	24%
No of sign-ups by organisations reporting complaints	1,855,756	1,701,293
Total no of complaints reported	349	357
Ratio of complaints to number of sign-ups*	1:5,317	1:4,766

Fig 27: Type of complaint - street fundraising



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.



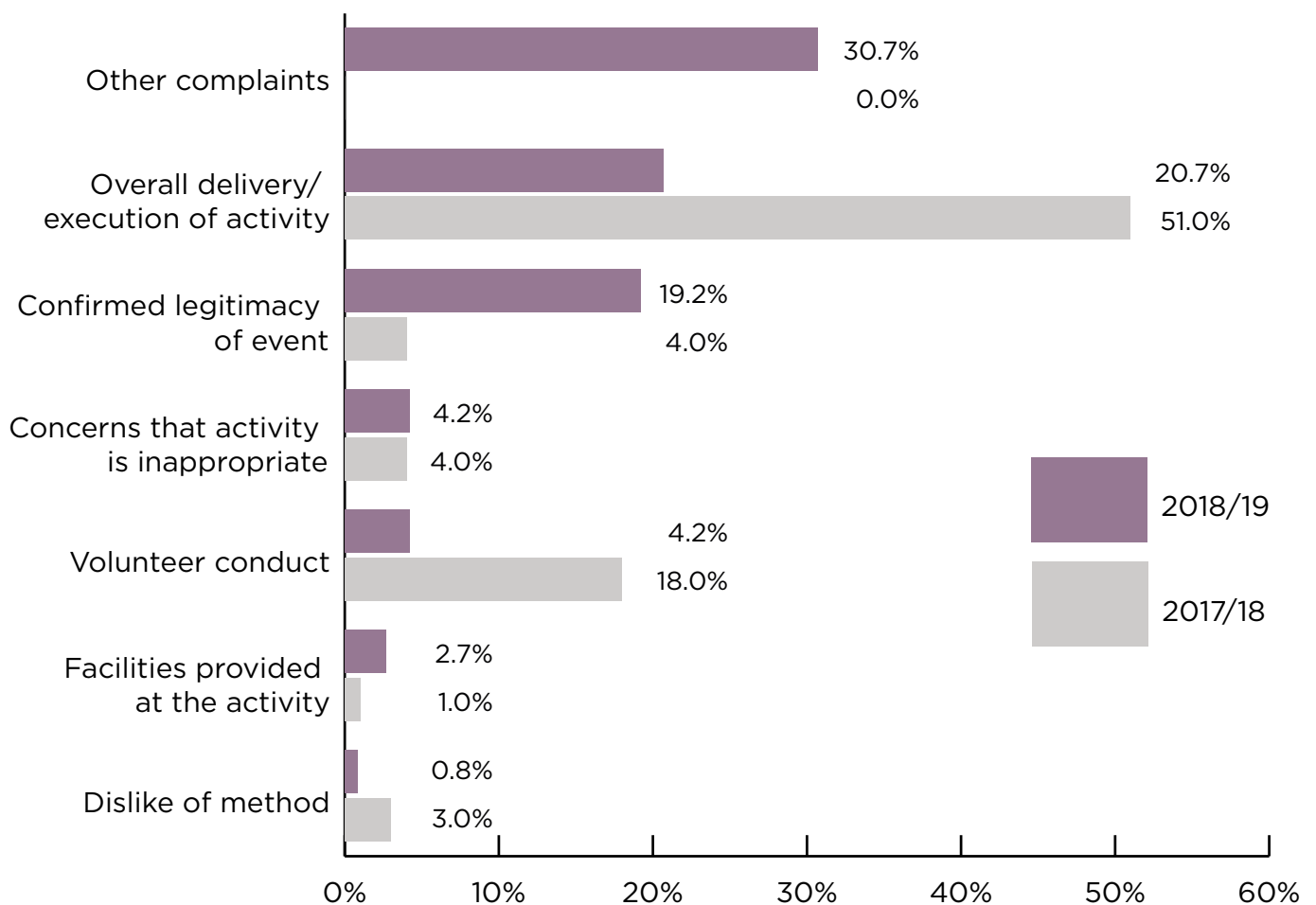
Volunteer fundraising

The number of complaints reported has dropped by 30%, and the number of 'on behalf of' events has decreased by 20%. There has been a significant rise in the number of complaints about the legitimacy of such events. In contrast, there has been a significant fall in the number of complaints about volunteer conduct and the overall delivery or execution of the activity.

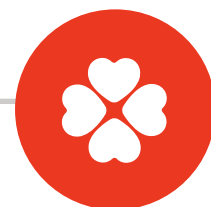
Table 15: Overview of volunteer fundraising complaints

	2018/19	2017/18
No of organisations reporting complaints about volunteer fundraising	21	17
Percentage of organisations reporting complaints	36%	29%
No of volunteer fundraising 'on behalf of' events by organisations reporting complaints	100,741	125,240
Total no of complaints reported	261	373
Ratio of complaints to 'on behalf of' events*	1:386	1:336

Fig 28: Type of complaint - volunteer fundraising



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.



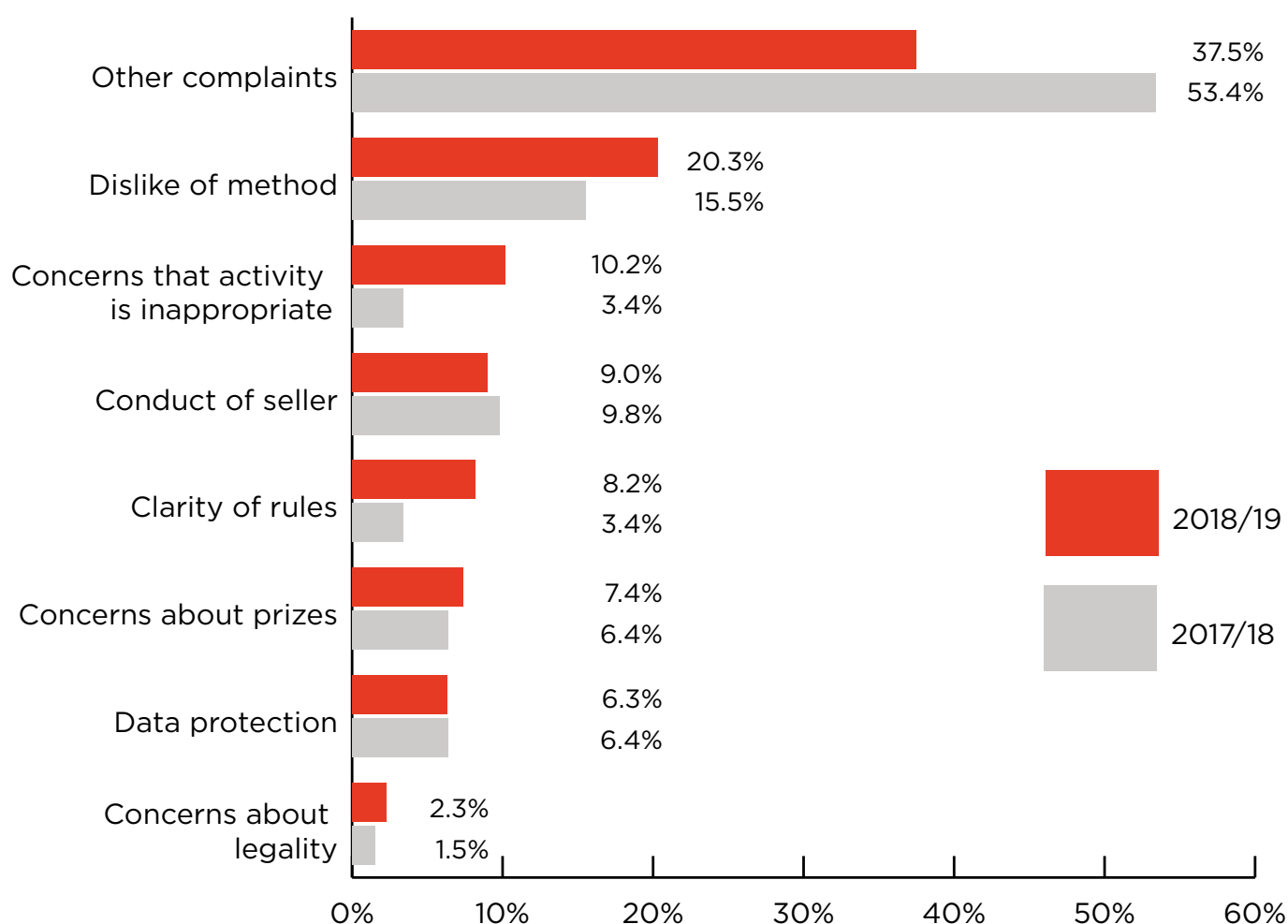
Lotteries

The number of complaints about lotteries fell slightly by 3%, despite a significant rise (42%) in the number of lottery tickets sold by the organisations that reported a complaint. The number of organisations reporting this complaint remains the same, but there was a growth in the number of complaints about disliking the method, concerns that the activity is inappropriate and clarity of the lottery rules.

Table 16: Overview of lottery complaints

	2018/19	2017/18
No of organisations reporting complaints about lotteries	26	26
Percentage of organisations reporting complaints	45%	45%
No of lottery tickets sold by organisations reporting complaints	41,506,397	29,162,691
Total no of complaints reported	256	264
Ratio of complaints to lottery tickets sold*	1:162,134	1:110,465

Fig 29: Type of complaint - lotteries



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.



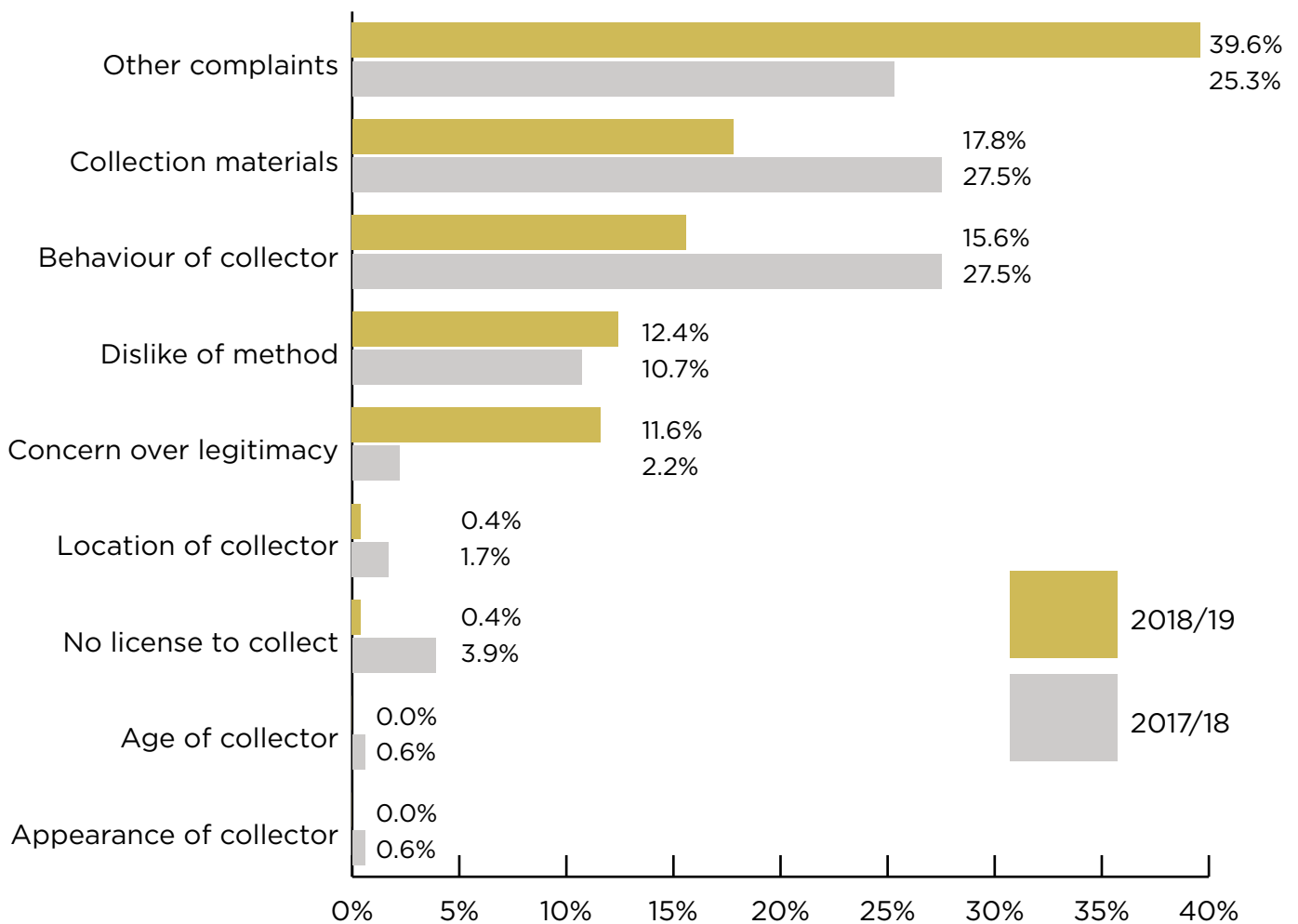
Cash collections

There has been a 26% rise in complaints about cash collections and an increase in the number of organisations who report these types of complaints. Although there has been a significant increase in complaints about concerns over the legitimacy of collections, complaints about collection materials and the behaviour of collectors have dropped.

Table 17: Overview of cash collection complaints

	2018/19	2017/18
No of organisations reporting complaints about cash collections	15	12
Percentage of organisations reporting complaints	26%	21%
No of collections made by organisations reporting complaints	491,934	410,044
Total no of complaints reported	225	178
Ratio of complaints to number of collections made*	1:2,186	1:2,304

Fig 30: Type of complaint - cash collections



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.



SMS fundraising

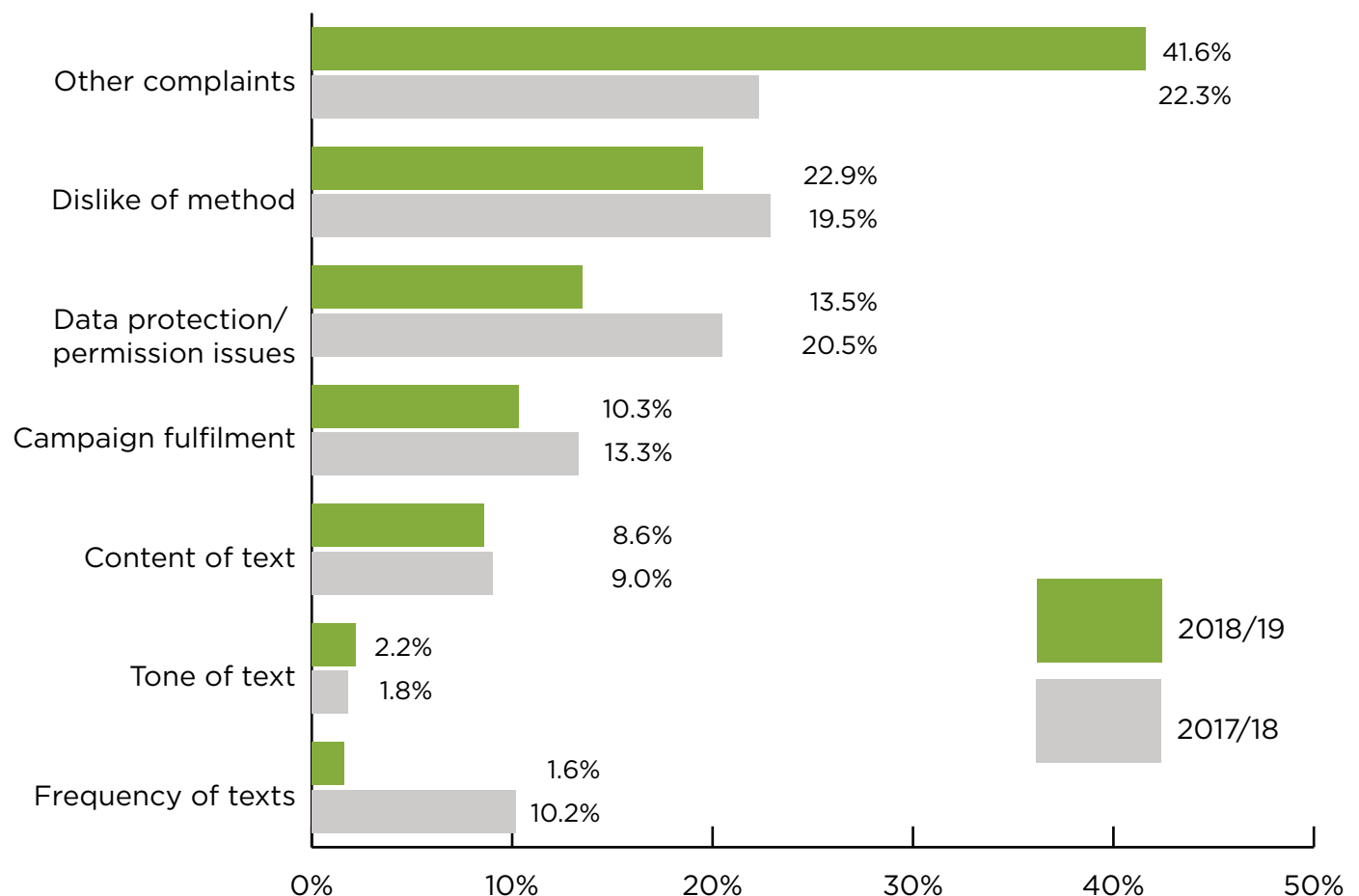
There has been an 11% increase in complaints about fundraising via SMS (text message), but they were reported by slightly fewer organisations. As a result, the ratio of complaints to text messages has increased slightly.

The increase in complaints categorised as ‘other’ seems to be linked to system errors from providers, such as not being able to respond to requests for donations or being charged twice. There has been fall in complaints about the frequency of texts, as well as those about data protection.

Table 18: Overview of SMS fundraising complaints

	2018/19	2017/18
No of organisations reporting complaints about SMS fundraising	16	18
Percentage of organisations reporting complaints	28%	31%
No of texts sent by organisations reporting complaints	4,188,825	5,946,244
Total no of complaints reported	185	166
Ratio of complaints to text messages sent*	1:22,642	1:35,824

Fig 31: Type of complaint - SMS fundraising



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.



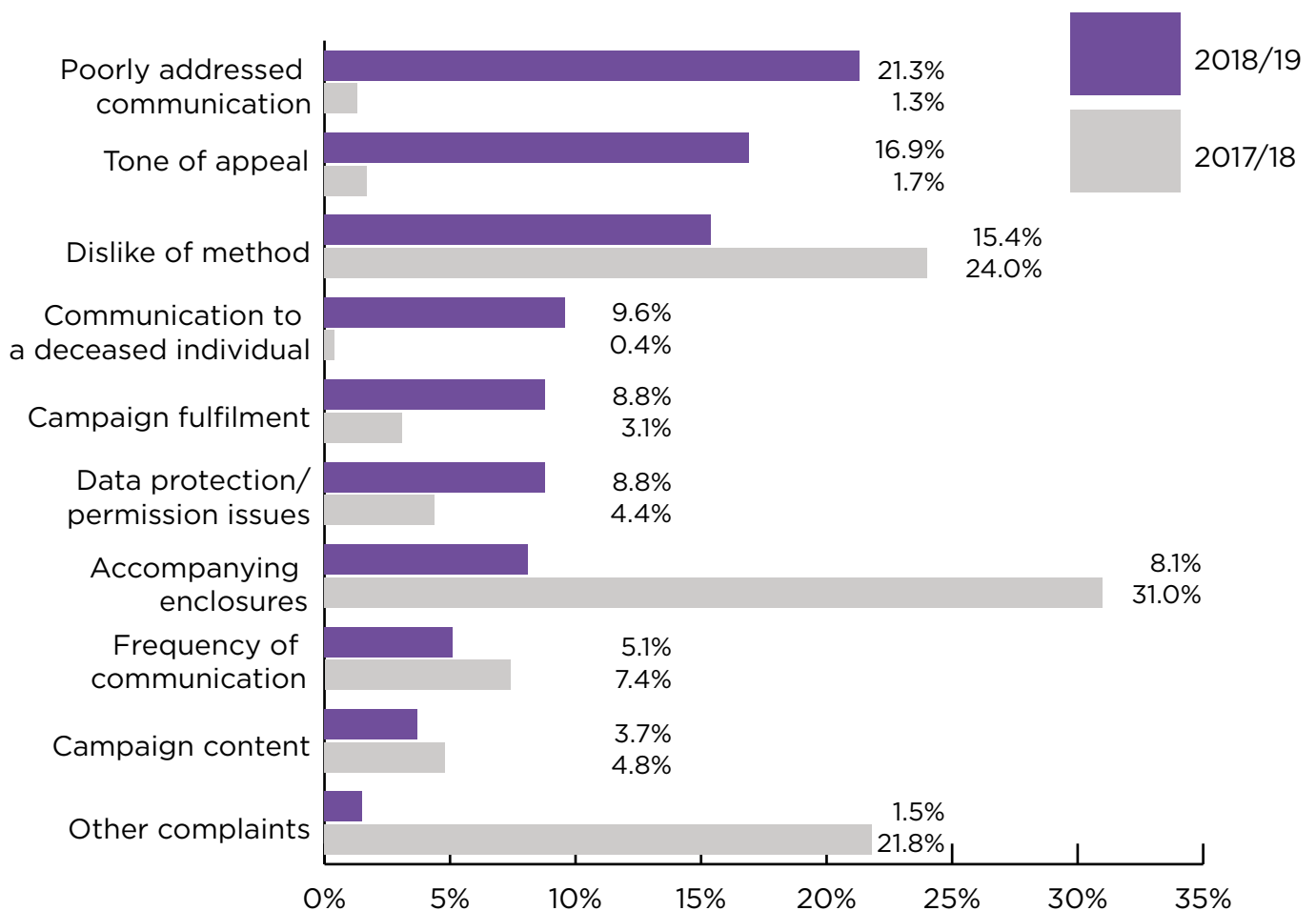
Unaddressed direct mail

The number of complaints about unaddressed direct mail has fallen by 41%, from 229 to 136, and the number of organisations reporting these complaints has increased. There has been a marked rise in the number of complaints across several categories (including campaign fulfilment, tone of appeal and poorly addressed communication), although this is likely explained by better recording methods, as those categorised as ‘other’ have dropped significantly. There has also been a fall in the number of complaints made about accompanying enclosures and a dislike of the method.

Table 19: Overview of unaddressed direct mail complaints

	2018/19	2017/18
No of organisations reporting complaints about unaddressed direct mail	17	13
Percentage of organisations reporting complaints	29%	22%
No of number of items sent by organisations reporting complaints	102,337,921	75,062,134
Total no of complaints reported	136	229
Ratio of complaints to number of items sent*	1:752,485	1:327,782

Fig 32: Type of complaint - unaddressed direct mail



*This is an approximate ratio using 1:x format for simplicity and consistency throughout the report.

Glossary

The definitions below were circulated to the organisations completing the Annual Complaints Return for 2018/19. Due to the timing of the return, these definitions will differ from those provided in the updated Code of the Fundraising Practice, which was published in June 2019.

Addressed direct mail – a fundraising appeal sent through the post which has been specifically addressed to an individual residing at the property.

Cash collection – the collection of donations from the public in the form of coins and banknotes in buckets and envelopes. This includes static collections, street collections and private site collections.

Clothing collections – a fundraising campaign which entails distributing collection bags to households with the purpose of obtaining clothes and other goods for resale and/or recycling.

Door-to-door fundraising – a face-to-face campaign which entails fundraisers visiting residential addresses with the purpose of securing a regular direct debit donation.

Email fundraising – a fundraising appeal that has been sent to both existing and prospective supporters by email.

Fundraising activity – any activity which is specifically designed to raise income for a charity.

Fundraising from business – a fundraising campaign which has been run in conjunction with a commercial partner and/or participator. This includes campaigns in which a percentage of product sales have been agreed and ‘charity of the year’ activities.

Lotteries – a fundraising appeal which involves the distribution of tokens resulting in the winning token (or tokens) being selected at random in an official draw. This usually involves a monetary prize.

Magazine/newspaper inserts – a fundraising campaign involving hard copies of flyers or leaflets enclosed in the pages of newspapers and magazines.

Major donor fundraising – any fundraising activity which has involved interaction with either prospective or current high-value givers.

Online advertising – a fundraising appeal that is specifically aimed at an online audience. This includes internet banners on third-party websites and pop-ups asking for financial contributions and/or advertising an event.

Other prize draws – a gaming-based fundraising campaign that either involves an element of skill (for example, a question) and/or has a free entry route.

Outdoor advertising – a fundraising appeal which has been displayed in prominent outdoor locations such as billboards, bus stops and advertisements on public transport.

Outdoor events – outdoor fundraising activities which involve an element of physical exertion. This includes fun runs, challenge events, golf days, tournaments and marathons. It does not include outdoor concerts, fetes, fairs or treasure hunts.

Glossary

Press advertising – a fundraising appeal which has been included in printed media, such as magazines or newspapers.

Private site fundraising – a ‘face-to-face’ campaign which entails fundraisers approaching members of the public on private property (for example, supermarkets or shopping centres) with the purpose of securing a regular direct debit donation.

Radio advertising – a fundraising appeal that has been broadcast on a local, national or digital radio station.

Raffles – a lottery in which the prizes are goods rather than money.

SMS fundraising – a fundraising appeal which has been sent to the public through mobile text message.

Social activities – fundraising activities that have a particularly social focus.

Street fundraising – a ‘face-to-face’ campaign which entails fundraisers approaching members of the public on the street with the purpose of securing a regular direct debit donation.

Telephone fundraising – a fundraising appeal which uses the telephone to approach both prospective and existing supporters.

Television advertising – a fundraising appeal that has been broadcast on television through paid-for advertising. This includes campaigns for regular gifts and one-off donations and event advertising.

Trusts and foundations – set up by companies and/or individuals for the purpose of using profit or private wealth for charitable purposes.

Unaddressed direct mail – a fundraising appeal sent through the post with a direct ask and which has not been addressed to a specific individual but instead the occupier of a property. These appeals may also be known as ‘door drops’.

Volunteer fundraising – any fundraising activity led by volunteers which the charity concerned is aware of and is providing its support for.



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