



FUNDRAISING
REGULATOR

Annual complaints report 2020/21

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Executive summary

This report is split into two parts and records data from 1 April 2020 – 31 March 2021. This covers the periods in which the UK entered national lockdowns in response to the COVID-19 pandemic.

In **Part 1** we examine the complaints escalated to the Fundraising Regulator. The Fundraising Regulator investigates complaints about charitable fundraising where these have not been resolved by the organisations concerned themselves. We do so by considering whether the organisation has complied with the Code of Fundraising Practice (the code), which sets out the standards that all charitable fundraising organisations across the UK are required to meet.

In **Part 2** we examine the complaints received by 56 of the UK's largest fundraising charities, that individually spend more than £5 million per year on their fundraising activities. They are asked to report, via a voluntary survey, how many complaints they have received about a range of fundraising methods and, where possible, the reasons for these complaints.

It is important that charities record and monitor the complaints they receive. Charities can use this valuable data to learn from complaints and improve their practices. By sharing their data, the contributing charities are supporting wider learning across the charitable fundraising sector.

This report provides an overview of broad trends in fundraising complaints for 2020/21. This information is intended to identify areas of fundraising practice that may require specific expertise, new processes or more planning to get right.

Key findings

Part 1: Complaints received by the Fundraising Regulator

- In 2020/21, we closed 362 in-remit complaints about charitable fundraising and we completed 13 investigations. These figures are down on the previous year, although the total number of incoming complaints (including in-remit and out of remit) is up.
- We found that COVID-19 was the primary theme in only 27 complaints received by the Fundraising Regulator.
- For the third year in a row, charity bags were the most complained about method of fundraising to the Fundraising Regulator, receiving 105 complaints in 2020/21. The second most complained about method was digital and the third was addressed mail.
- The most common cause of complaint across all fundraising methods received by the Fundraising Regulator was misleading information.
- Lottery fundraising was an emerging method that more people are beginning to complain to us about.

Part 2: Complaints reported by a sample of large charities

- Charities reported receiving a total of 17,800 complaints, which was down by 4% on the figure reported last year.
- Online fundraising received the most complaints (5,836); this method of fundraising has seen a 357% increase in complaints over the past three years. It is the first time in the history of this report that online fundraising is the most complained about method reported by charities.
- Addressed mail (3,687) and corporate fundraising (2,504) were the second and third most complained about methods respectively.
- We saw a drop in both activity levels and complaints received for methods of fundraising that involved in-person contact.

Four key themes

1. Complaints to the regulator were not significantly impacted by the pandemic

Complaints received by the Fundraising Regulator during 2020/21 were about a variety of fundraising methods, including digital, in-person fundraising (including street, door-to-door fundraising), events, and most prominently, fundraising using charity bags. These fundraising activities have featured within the top 10 most complained about methods in previous years. In the small number of complaints that were related to COVID-19, people were often concerned about in-person fundraising taking place in a time of social distancing. This year, we saw more complaints about lottery fundraising, however this method makes up a very small proportion of the overall complaints received.

2. Complaints to charities reflect a shift from in-person fundraising

The data in Part 2 of this report shows that many of the sampled charities either stopped or reduced their fundraising activities that involved in-person contact with the public. This led to a reduction in complaints about these methods. Yet we did not see an increasing number of charities taking up methods of fundraising that do not involve in-person contact, for example telephone or SMS fundraising.

The data also shows a notable increase in online fundraising complaints, which aligns with anecdotal evidence about charities focusing on methods of fundraising that do not involve in-person contact during the pandemic. Although complaints have increased, this activity appears to be relatively low risk in terms of complaints, as this report finds that just 1 impression¹ in nearly 2 million received a complaint.

It is important for charities to consider how they expand their use of online fundraising while working to best practice and following the Code of Fundraising Practice. Over the next year, the Fundraising Regulator will focus on helping the sector and members of the public understand online fundraising and the risks that this method can involve.

3. Some fundraising methods are more unpopular than others

This report highlights the fundraising methods that are the most likely to receive a complaint. The prime examples are charity bags and addressed mail. Other activities that are likely to generate complaints are in-person fundraising methods, such as: street fundraising, private site fundraising, and door-to-door fundraising.

When using these methods, charities should take particular care to understand the risks and mitigate them as far as possible. Learning from complaints is key. Charities need to be confident that they can offer assurance to the public that they can carry out these methods of fundraising in an appropriate way.

4. At a time of crisis good fundraising has prevailed

We know that charities have had to operate in difficult circumstances due to the pandemic; many have furloughed staff, reduced their fundraising activities and grappled with new technology and changing public expectations. This year's report shows that, despite the unprecedented challenges that the charity sector has faced, overall good fundraising practice has prevailed, as complaints continue to decline.

¹ An impression is the measure used for the number of times an advert is displayed to people online

Fundraising complaints at a time of crisis

By Jenny Williams, Chair of the Complaints and Investigations Committee

This year's Annual Complaints Report is set against a backdrop of unprecedented interruptions to charitable fundraising that resulted from the COVID-19 pandemic. Public fundraising methods were particularly affected by restrictions on person-to-person contact that were imposed by governments across the UK during this reporting year. Some charities worked with a reduced staff team, because of staff furlough and redundancies. This meant that income generation for many charities was challenging throughout 2020/21. But at the same time, we saw many strikingly successful fundraising campaigns, as the British public responded with overwhelming generosity to urgent fundraising appeals. This report explores the impact of the pandemic on fundraising complaints made to the Fundraising Regulator and a sample of large fundraising charities.



While the full financial impact of the pandemic is still largely unknown, this report finds that its immediate effect on fundraising complaints was less marked than expected. There was neither an increase nor significant decrease in complaints about charitable fundraising reported by charities or the Fundraising Regulator. With fewer staff to handle incoming complaints and many charities turning to different methods of fundraising for the first time, conditions for increased complaints may have been ripe. But this was not the case. But we also know that in-person fundraising methods were paused for much of this reporting year and members of the public had a lot of pressures on them, leaving them less capacity to make complaints – so a large fall in complaints would have perhaps been understandable. Instead, we saw a marginal year-on-year decrease in complaints about charitable fundraising in both parts of this report.

The pandemic does not appear to have affected the types of complaints escalated to the Fundraising Regulator; charity bags were still the most complained about method. This theme has continued over the past three years. However, complaints recorded by the charities appear to reflect how their activity adapted during the pandemic. For example, complaints about online methods increased and there were fewer complaints about in-person fundraising methods. This is likely to be a result of activity increasing and decreasing respectively for these methods.

This year's report includes some changes to the categories that we use to record fundraising complaints data, which brings them up to date with current fundraising practices (see the Annex for further information). Direct comparison between this report and earlier reports is therefore limited. These changes result from engagement with the charities that submit their data to this report. We are committed to continually listening to the sector and adapting the resources we produce so that they remain useful. We plan to carry out further engagement on Part 2 of this report in 2022, and we will use this to inform the production of future reports.

Throughout the pandemic, the Fundraising Regulator worked with governments and public health bodies to issue tailored and practical guidance for the sector. I'd like to take this opportunity to thank the sector for its commitment to upholding fundraising standards amid the challenging environment, for pausing their fundraising where appropriate, and only resuming fundraising when it has been safe and responsible to do so. I'd also like to thank the team at the Fundraising Regulator for their continued commitment to handling complaints sensitively and effectively amid the pandemic.

I encourage you to read the findings of this report in conjunction with our guidance and webinars on the Code of Fundraising Practice. Together these resources are intended to support effective complaints handling and ensure that charitable fundraising in the UK is legal, open, honest and respectful.

Complaints received by the Fundraising Regulator between 1 April 2020 and 31 March 2021

Introduction

In this part of the report, you will learn about complaints from the public that were escalated to the Fundraising Regulator. We publish this information for transparency and to share learning with the sector, which we encourage charitable fundraising organisations to use to improve their practices.

We investigate complaints about charitable fundraising where these have not been resolved by the organisations concerned themselves. We do so by considering whether the organisation has complied with the Code of Fundraising Practice (the code), which sets out the standards that all charitable fundraising organisations across the UK are required to meet.

Some complaints that come to us may be more appropriate for consideration by another regulator, such as the Charity Commissions for England and Wales or for Northern Ireland if the concerns are governance related; the Information Commissioner's Office if they are data privacy related; or the Advertising Standards Authority if related to advertising, among others. In these cases, we will signpost the complainant to the most appropriate regulator and mark this as 'out of remit'. Where a complaint falls within our remit but is also of interest to another regulator, we will notify the relevant regulator of our findings.

Complaints during the COVID-19 pandemic

The COVID-19 pandemic had an unprecedented impact on almost all areas of our society, including charitable fundraising. Restrictions on person-to-person contact meant that many traditional methods of fundraising had to pause or adapt. Against this backdrop, we monitored our incoming complaints throughout the year for concerns relating directly to fundraising during the COVID-19 pandemic.

In 2020/21, we closed 362 complaints about charitable fundraising, which is slightly down from the 368 received last year. Although the complaints we received in 2020/21 were about a variety of fundraising methods (see page 13), we did find that circumstances unique to the pandemic were present in a small number of complaints. We found that COVID-19 was the primary theme in 27 cases. It is encouraging to see relatively few complaints in this area. This small proportion reflects the positive way the sector has adapted its fundraising during this challenging period, in particular its sensitive and agile approach to reflect changing guidance and public sentiment.

In the cases where COVID-19 was the primary theme, some were related to concerns that Government guidance was not being followed, for example fundraisers not wearing PPE or following social distancing rules. Other complainants were unhappy that face-to-face fundraising resumed at all in between periods of lockdown as they considered

it unsafe or inappropriate. We also received some complaints related to face-to-face fundraising and charity bags where the individual was concerned for the welfare of people in vulnerable circumstances (for example, if a member of the household was clinically vulnerable and shielding). These complaints were made to us early in the pandemic, before the vaccine rollout.

Throughout the pandemic, the Fundraising Regulator's primary aim was to ensure that Government guidance was followed by fundraisers, so that the public was protected, and the good reputation of fundraising was upheld. We ensured that organisations had the information they needed to adapt their activities, through our Coronavirus guidance series, which included tailored information about specific fundraising practices. Reception to this guidance from the sector was overwhelmingly positive and many organisations engaged with us via our enquiries and complaints services to make sure they implemented it effectively.

While we sought to reassure members of the public through our guidance series by setting out what to expect from fundraisers, it became clear that public sentiment and appetite for contact with strangers was a key factor for organisations to consider when planning to resume their fundraising activities. Even if guidance was followed and all precautions sought, during periods of lockdown we encouraged organisations to reflect seriously on whether to carry out in-person fundraising at all.

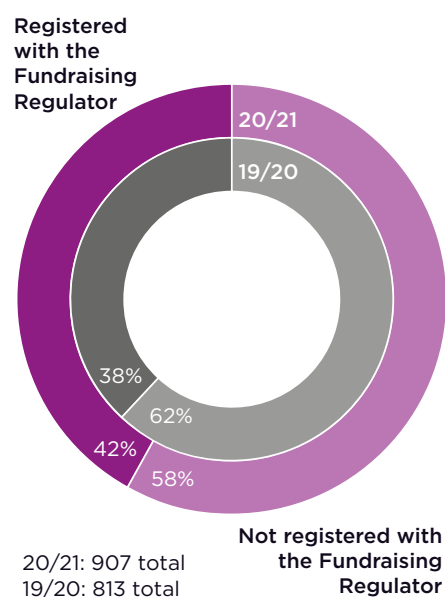
We carried out three investigations during the year that raised concerns specific to the COVID-19 pandemic. One of these cases is featured as a case study in this report (see page 17); the other two remain ongoing and summaries will be published on our website when they conclude.

Overall, the pandemic appears to have limited impact on the number of complaints made directly to us. The main themes of the complaints we received were not specific to COVID-19.

Incoming fundraising complaints

We received 907 incoming complaints in this reporting year². The complaints we assessed in this reporting year included in-remit complaints about charitable fundraising (363), as well as those that were out of remit (459) and those with insufficient information to be classified. This is the highest figure reported over the past three years, and up by 11% on last year. There were three notable peaks in the volume of incoming complaints in July 2020, December 2020 and March 2021, where 86, 97 and 96 complaints were recorded in each month respectively.

Our data shows that we receive more incoming complaints about organisations that have not registered with us. The graph

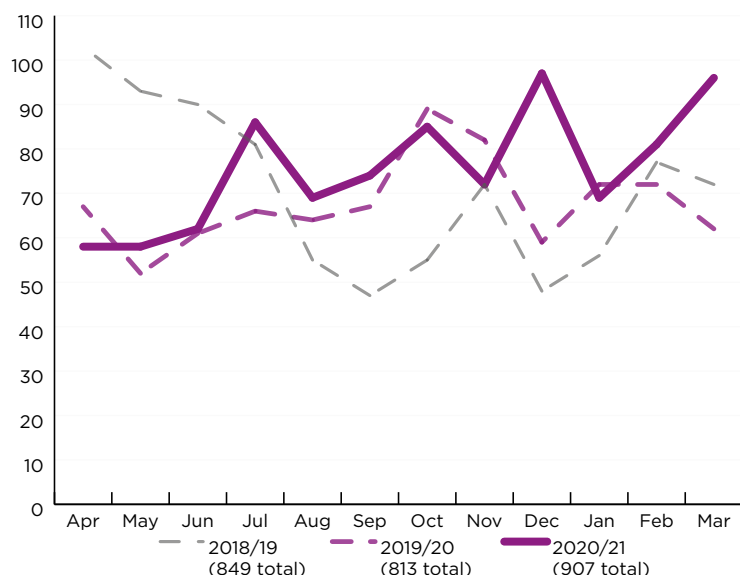


Graph: Registration status of organisations associated with incoming complaints

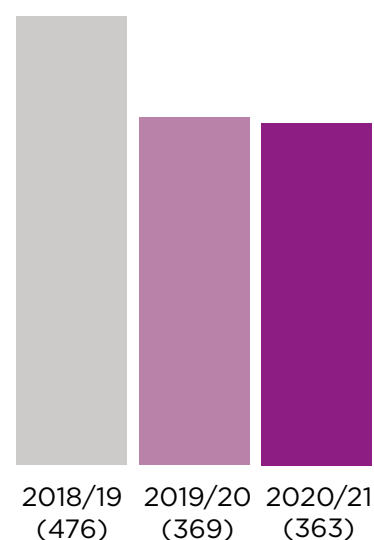
² Incoming complaints represent cases opened by the regulator between 1 April 2020 - 31 March 2021. A small number remained in progress from 1 April 2021 onwards and were therefore not closed as complete within this reporting period.

shows that around 40% of incoming complaints were about registered organisations over the past two years. Looking closer at the non-registrant data, many of these complaints do not concern charities or third-party fundraisers. Instead they concern individuals carrying out ‘in-aid-of fundraising’³, crowdfunding or are out of remit (i.e. are not about fundraising at all).

Graph: Total incoming complaints to the Fundraising Regulator over three years



Graph: Remit status of incoming complaints over three years

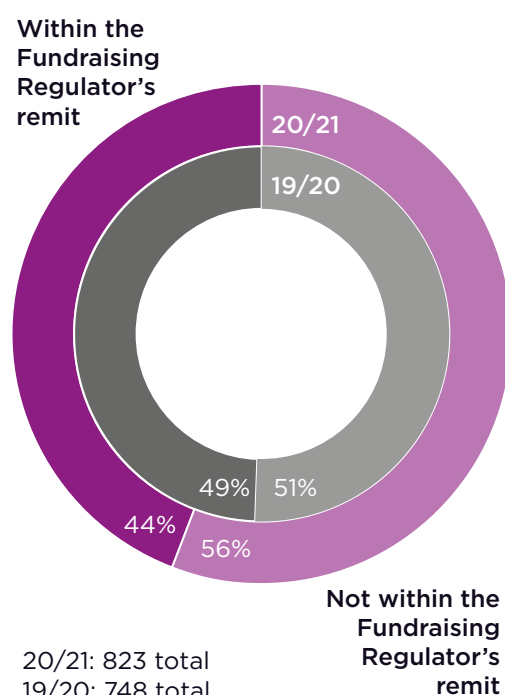


Closed fundraising complaints

We closed 905 complaints in this reporting year, this includes a number of complaints (24) that were opened before April 2020⁴.

Every year, around half of the complaints we handle are out of our remit. These complaints may be related to financial, governance, data, or other concerns, rather than charitable fundraising. When a complaint is out of our remit, we signpost the complainant to the most appropriate body to handle their concerns. We signposted most of out of remit complaints to the Charity Commission for England and Wales, followed by Action Fraud.

Graph: Remit status of closed complaints⁵



³ 'In-aid-of fundraising' is defined as an individual or group raising funds for a charitable organisation independently and without the instruction of that charitable organisation. In some cases, the organisation may know about the activity and even provide supporting materials.

⁴ Closed complaints represent cases completed by the regulator between 1 April 2020 - 31 March 2021. This includes a number (24) that were submitted to us before the start of this reporting period.

⁵ Please note that the complaints listed in this graph do not add up to the total complaints closed in each reporting year. This is because some complaints contained insufficient information to be able to be classified as within or not within the Fundraising Regulator's remit.

Table: Signposting to other organisations in 2020/21

Organisation the complainant was signposted to	No. of out of remit complaints signposted
Charity Commission	144
Action Fraud	82
Trading Standards	14
Citizens Advice	14
HMRC	2
Other organisation	77
Total	333

The graph illustrates how we progress complaints. In 2020/21, we closed 67% after our initial consideration. This often involves us making enquiries of the organisation complained about to establish the facts of the situation. This further evidence helps us to assess whether a potential breach of the code has occurred, which may warrant formal investigation.

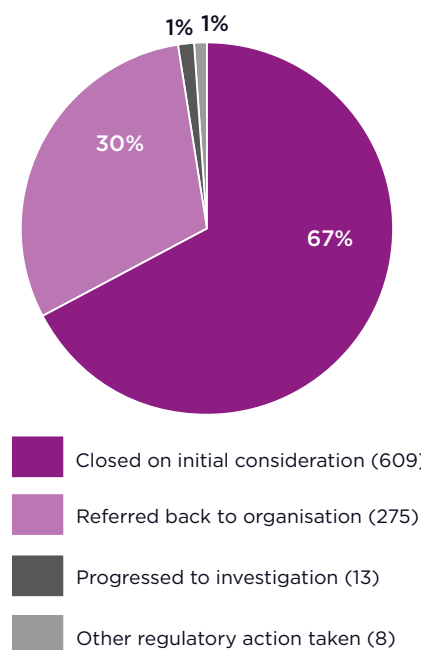
A third of complaints were made to us prematurely (we will normally only consider a complaint where it has been put the organisation complained about first). Just over 1% (13 complaints) progressed to formal investigation and a further 1% required other regulatory action. Other action may include engaging with the organisation to seek assurances, share guidance or to highlight specific standards of the code.

In 69% of investigations we identified a breach of the code

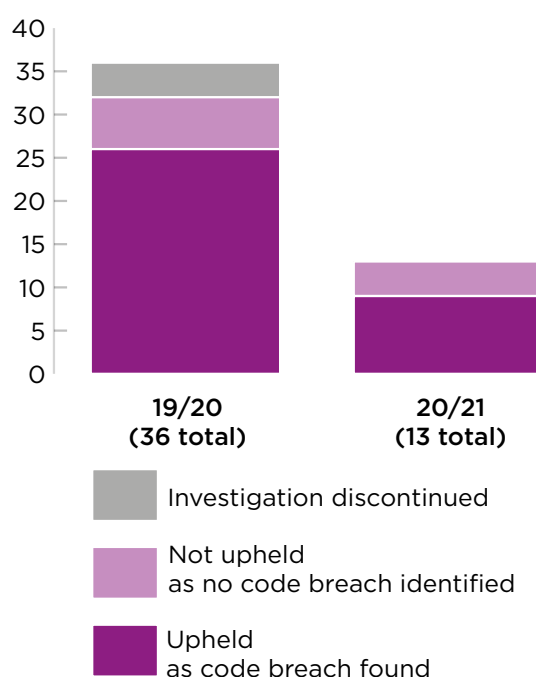
We completed 13 investigations in 2020/21. This is fewer than in the previous year because we have overhauled our investigations process. We now focus on assessing complaints made to us in more detail in preliminary stages. This ensures we are proportionate in our regulation and do not expend resource – both ours and the organisations complained about – formally investigating cases where there is clearly no breach of the code.

In 69% of our investigations, we found a breach of the code. This is broadly in line with the proportion of upheld complaints reported last year. During our investigative process, we assess the organisation's fundraising activity against standards in the code. We do not always uphold the grounds for the original complaint, however, we may on occasion find breaches concerning other areas of the organisation's activity.

Graph: How we handled complaints in 2020/21



Graph: Investigations upheld year-on-year comparison



Fundraising Preference Service

The Fundraising Regulator operates the Fundraising Preference Service (FPS), which is a free service that helps people to manage the marketing contact they receive from charities registered in England, Wales and Northern Ireland.



The FPS is particularly useful to support those who are in vulnerable circumstances and may be unable to make informed choices about giving to charity. More than a third of FPS suppressions are made on behalf of a friend or relative.

We do not record requests to suppress contact from charities made through the FPS as complaints about fundraising. However, FPS activity is an important indicator of public attitudes towards charitable fundraising.

Over the past year, 722 charities have received requests from the public to stop contacting them. Since the service launched in 2017, there have been 12,367 requests made about 2,020 charities. These figures show that the FPS is playing a significant role in helping members of the public to take control of how they are contacted by charities. This year we received eight complaints about charities not having actioned an FPS request.

It is positive to see charities proactively engaging with the FPS by setting themselves up on the charity portal to receive notifications of suppression requests. In total, 2,264 charities have signed up to the portal.

Charities' compliance with FPS suppressions is good; there were just two organisations that have breached the code by failing to access their suppressions in 2020/21. We publish a monthly list of these non-complaint charities on our website; in total, there are 13 charities on this list, that have failed to access their FPS request since 2017. When we find a breach of the code in relation to the FPS, we notify the Information Commissioner's Office of a potential breach of the Data Protection Act 2018 and notify the Charity Commission for England and Wales and/or Northern Ireland due to the charity's failure to respond to the request.

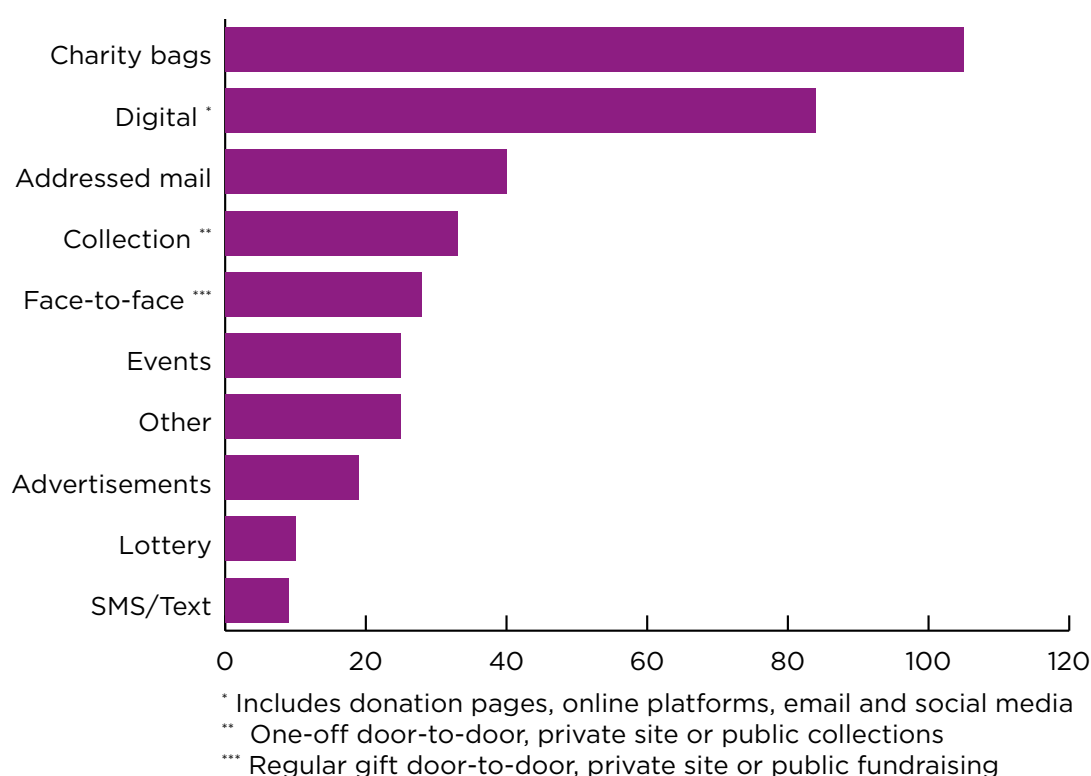
Complaints about fundraising methods

The complaints we received during 2020/21 were related to a variety of fundraising methods, including digital, in-person fundraising (including street, door-to-door), events, and most prominently, fundraising via charity bags⁶. These methods also feature as some of the most complained about last year. It does not appear that the pandemic has had a significant impact on the types of fundraising activity that members of the public raise concerns with us about.

However, the relative number of complaints recorded for each method does perhaps reflect how fundraising changed during the pandemic. For example, face-to-face fundraising (including door-to-door) has historically featured in the top three most complained about methods and we saw a much greater proportion of digital complaints this year, compared to previous years. This aligns with how the sector adapted as a result of restrictions on person-to-person contact. This finding is also reflected in the complaints reported by charities in Part 2 of this report.

A new addition to the top 10 table this year is lottery fundraising. Although this method makes up a relatively small proportion of the overall complaints received, it has overtaken the number of complaints made to us about corporate fundraising, telephone fundraising, charity shops and unaddressed mail. The nature of complaints about lotteries were varied, however several concerns relate to a general dislike of the method. We will continue to track these complaints closely to see if this increase develops into an ongoing trend. See page 18 for an analysis of lottery complaints.

Graph: Top 10 most complained about fundraising methods in 2020/21⁷



6 Charity bags fundraising definition: The distribution of charity bags to households with the purpose of obtaining clothes and/or other goods for resale and/or recycling.

7 Please note, we are unable to provide year-on-year comparisons for the most frequent complaints made to us because we have changed our internal categories for recording this data.

Most complained about method: Charity bags



Every year charity bags are the most complained about method of fundraising to the Fundraising Regulator and 2020/21 was no exception. This year we received 105 complaints about this method, despite some organisations choosing to pause this activity during periods of national lockdown and some ceasing to use this fundraising method altogether. This may explain why this year's figure is down on the number reported last year (125 complaints). In Part 2 of this report, we find that charity bags were only used by six of the UK's largest fundraising charities, suggesting that this method of fundraising may be more popular among smaller and medium-sized charities.

The main reason for charity bag complaints is a failure to respect the wishes of a householder who has made it known that they do not want to receive charity bags. This is the main reason for charity bag complaints every year and is a concern that has been heightened for some by the context of the pandemic, due to fears of contamination.

To help improve fundraising practices in relation to charity bags fundraising, we have published guidance for the sector. We have also published advice for members of the public so that they know how to identify genuine bags, and what to expect when they receive them. Our website data shows that our advice for the public has been particularly well received, suggesting that it is an area of fundraising that people are keen to know more about. Data from our enquiries service also shows that we receive many more questions from the public about this method than from the charitable sector. This is different from all other fundraising methods, where the enquiries tend to be from fundraising organisations. We encourage organisations fundraising via this method to share this guidance with their supporters.

Key learnings for charity bag fundraising

1. **Investigate, don't just apologise:** organisations must always make sure any complaint made is properly investigated and an appropriate solution found. We often see organisations quickly apologising for the delivery of an unwanted charity bag, and committing to the issue not happening again, without proper investigation. Sometimes individual members of the public experience this on repeated occasions, leading to frustration. You should identify whether the complainant has previously complained, explore why the breach occurred and explain what action you are taking to mitigate the risk of it happening again.
2. **Train all staff, and regularly monitor third parties:** although human error cannot always be avoided, organisations should regularly check that their distribution company is carrying out their role in accordance with their training. Organisations must have proper oversight of any third party, rather than simply lending its name to the activity.
3. **Comply with fundraising standards:** follow section 8 of the Code of Fundraising Practice. This is in addition to the general standards that apply to all types of fundraising.

CASE STUDY: When apologies alone are not enough

A distribution company continued to deliver charity bags to a complainant on behalf of a national charity, despite having a sign on their door which states 'addressed mail only' and their address being recorded on the company's 'do not deliver' list. This was a result of the distributor not having adequate training on the purpose of the 'do not deliver' list.

By continuing to deliver charity bags to the complainant, the company breached the requirements of the code not to deliver to households with a 'no charity bags' sign, or words to that effect. And by delivering to an address that had been marked as restricted, the charity engaged in unreasonably persistent fundraising.

The charity failed to respond to the complainant's concerns appropriately, as it did not acknowledge the failings in its process. The charity also breached the code on monitoring third parties by not taking all reasonable steps to ensure the distribution company's compliance with the code, nor had it demonstrated sufficient learning from complaints.

Recommendations for the distribution company:

- review its system for identifying and communicating restricted addresses to distribution staff.
- review its training relating to avoiding households with 'no charity bags' signs.

Recommendations for the charity:

- update its contract with the company to ensure that the arrangements provide specifically for adherence to the code.
- review and improve its quality monitoring measures, paying particular attention to restricted addresses and properties that display a 'no charity bags' sign.
- review and improve how it records and reviews complaints to improve its complaints handling, including the way it evidences learning.

Second most complained about method: Digital

In a year where there were restrictions on in-person contact, digital was one of the most complained about fundraising methods. Our definition of digital fundraising includes email, online fundraising platforms, social media, donation pages on charity websites and pop-up banners. This year we also found evidence of charities adapting traditional methods, such as lotteries and events, to the digital space.



We received 84 complaints about digital fundraising in 2020/21, which is an increase in the figure reported last year. In November 2020, a CAF poll found that just over half (53%) said they needed to make a shift to a more online fundraising approach because of the pandemic. The same research also found that just over a third of charities were currently fundraising online, whilst nearly two thirds (62%) said that they were not⁸.

⁸ Charities Aid Foundation, Covid-19 What it means for giving; www.cafonline.org/about-us/research/coronavirus-and-charitable-giving

This could suggest that the uplift in digital fundraising complaints was partially a result of charities trying new methods of fundraising for the first time.

The main theme of the complaints we received about digital fundraising was that the information presented to the donor was misleading – either in its misrepresentation of the cause or the way in which funds raised would be spent. Concerns about misleading fundraising cut across all fundraising methods.

Five tips to avoid misleading donors

Over the four years we have produced this report, we have consistently found that misleading information features as a theme in complaints about all fundraising methods. To help organisations provide clear and informative messaging, here are five areas to consider when planning fundraising communications:

1. **Be clear about why the donations are needed and what the funds raised will be spent on.** Set out whether the money is being raised for a restricted fund or general purposes. If fundraising materials focus only on one specific area of need, it is easy to inadvertently imply that the donations will be used for a restricted fund. Make it clear if the intention is to raise money for general purposes.
2. **The content and presentation of information should be considered carefully.** Something as simple as website layouts can inadvertently mislead donors, so take time to review both the information and its context. Try to view it through the eyes of an individual who does not have access to any other information about the cause. Consider whether the materials provide enough information for members of the public to make an informed donation decision.
3. **Inform donors what will happen if you exceed or do not reach your goal.** If the money is being raised for a particular purpose with a target attached, donors must be told what would happen to the donations if the total amount raised is not enough to reach (or is more than) the target.
4. **Some charitable causes may attract more hostile attention and scrutiny.** Be mindful that not everyone will want to support the cause. Be ready to answer questions openly and helpfully. Be prepared to back up any claims with evidence where necessary.
5. **Provide volunteers with appropriate training and support.** If someone is raising funds independently of the charity, this should be communicated as ‘in-aid-of fundraising’⁹ in the appeal, to distinguish this from the organisation’s fundraising.

⁹ ‘In-aid-of fundraising’ is defined as an individual or group raising funds for a charitable organisation independently and without the instruction of that charitable organisation. In some cases, the organisation may know about the activity and even provide supporting materials.

CASE STUDY: Misleading information in a television advertisement

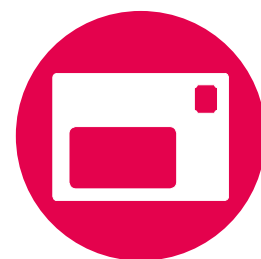
A complainant believed a charity's television advertisement was misleading as it suggested that the funds it raised were for the COVID-19 pandemic, but the aim of the advertisement was to raise money for the charity's general funds.

We did not uphold the complaint because we did not find that the information in the advert about the pandemic was misleading. But the charity breached the code in relation to misleading information as the advert suggested that donations would be spent only on the work of its helpline, yet the aim was to raise money for the charity's work more generally.

The addition of a few clarifying words would have avoided the risk of breaching the code on potentially misleading people and restricted donations. For example, a short message in the script or on screen during the advertisement could say that donations would support the organisation's general activities or make it clear the activities shown were non-exclusive examples of the charity's work.

Third most complained about method: Addressed mail

Although featuring in the top three, addressed mail fundraising received significantly fewer complaints than both online and charity bag fundraising. Across the year, 10% of complaints related to this method (40 complaints in total); this is closely followed by complaints about collections and face-to-face fundraising.



Most of these complaints related to handling personal data. Of particular concern to complainants was that they had been contacted by an organisation that they had no previous relationship with. Individuals were concerned about how the organisation had obtained their details, on what grounds the organisation considered they had a right to contact them, and whether the organisation's actions were compliant with General Data Protection Regulation (GDPR).

CASE STUDY: acting promptly when concerns are raised

The complainant was concerned that the charity had breached GDPR by purchasing a mailing list and using their name and address in a postal fundraising mailing.

In the mailing, the charity stated how it had obtained the recipients' details and gave information on how recipients could remove themselves from the list. When the concerns were raised, the charity acted promptly to remove the complainant's details from its mailing list and took steps to ensure that it did not mail them in future.

But the complainant considered that the charity should not have obtained data from a third party in order to send the postal mailing. We found that the charity's decision to use data from a third party was not a breach of the sections of the code relating to personal data. The charity also acted promptly when the complainant raised their concerns.

A growing trend: lottery, free draw and prize competition fundraising



‘Lottery’ is a broad term that includes a range of fundraising activities, such as raffles, tombolas and sweepstakes. Lottery fundraising can be operated online and in person. This year we saw lotteries enter the top 10 most complained about fundraising methods (10 complaints in total) for the first time. The complaints relate to a general dislike of the method and some individuals were particularly concerned about whether the lotteries were being run fairly and in line with regulations and laws.

The set up and administration of lotteries is regulated by the Gambling Commission. However, where a charitable draw offers a free entry route, it is regulated by the Fundraising Regulator. Find out more about the regulation of lotteries [in this blog¹⁰](#). Throughout this reporting year, property free draws generated a lot of press attention, which focused on the high value prizes at stake.

Lotteries allow charities to raise money from the public in a way that appeals to a wide audience. The added incentive of a prize enables charities to engage with those who may otherwise not donate. Individuals entering a lottery may not always consider themselves ‘donors’ because the charitable element may be secondary to their primary motivation of entering to win a prize.

As with all other fundraising, operators of charitable lotteries are required under the Code of Fundraising Practice to make sure that their fundraising is legal, open, honest and respectful, and that donors are treated fairly. This includes following the rules to ensure donors are adequately informed, not exerting undue pressure and safeguarding people in vulnerable circumstances.

If you are considering hosting a lottery, you should read the [Gambling Commission’s fundraising and lotteries guidance¹¹](#), as well as its [quick guide to lottery rules¹²](#). Both will help you understand the regulations that apply to a lottery you may be organising or taking part in.

Getting your complaints handling right

Good complaints handling is about proper internal training, thorough investigation, and appropriate communication. Complaints can be a valuable source of feedback and a positive learning tool. Staff should feel able to flag and escalate complaints in an open way, with the expectation that senior leaders will want to know about them and do everything they can to rectify the concerns. In charities, this includes their trustees, who are ultimately responsible for complaints, even if they delegate the day-to-day handling of these to staff.



¹⁰ www.fundraisingregulator.org.uk/more-from-us/news/leaving-nothing-chance-what-you-need-know-about-lottery-free-draw-and-prize

¹¹ www.gamblingcommission.gov.uk/public-and-players/guide/fundraising-prize-draws-raffles-and-lotteries

¹² www.live-gamblecom.cloud.contensis.com/PDF/quick-guides/Running-a-lottery-quick-guide.pdf

A mechanism should be in place for reporting complaints data to trustees. This reporting should be tailored to the size and specific fundraising activities that the organisation carries out. In the case of serious complaints (for example, those that warrant a serious incident report to the relevant Charity Commission) it may be appropriate for trustees to maintain close oversight of an individual complaint until the matter is resolved.

The relatively small number of complaints that are escalated to us suggests that the sector is handling most of the complaints it receives about its fundraising effectively and resolving these without the need for intervention from the regulator. However, concerns about poor complaints handling continues to be a theme of the complaints that we see. Better handling of these complaints at the outset may have prevented escalation.

Five tips for improving your complaints handling

1. **Treat all contentious matters as formal complaints:** if you are unclear whether a communication you receive is a complaint or a general expression of dissatisfaction, err on the side of caution. By treating these matters as complaints, a proper process will be applied to handling these concerns.
2. **Have a clear and accessible complaints process:** this should be prominently published on your website, and available for members of the public to access when they want. This should contain all relevant information on how you'll act on the concern, with timescales. See our [complaints handling guidance](#)¹³ for more on this.
3. **Thoroughly investigate complaints:** you should consider all complaints as a learning opportunity and a means to improve the way you operate. Complaints should be investigated with an independent person within your organisation, who is unrelated to the matter. If there is no such person available, consider whether you need to bring someone external in to look at the case. You should gather and review all evidence available to you to establish the facts.
4. **Make evidence-based decisions:** respond to all points raised by the individual and provide clear responses to each. You should explain your justification for action you will or will not take. Apologise where appropriate but recognise that it is your action that will put things right.
5. **Learn from complaints:** this is perhaps the biggest, most important, consideration. We cannot always prevent things from going wrong but it is vital that you learn from mistakes and put things right for the future. To do this, you will need to properly document the complaints you receive and investigations you carry out, report to your senior team and board on them, and put improvement plans in place.

Watch our [complaints handling webinar](#)¹⁴ for more information.

¹³ www.fundraisingregulator.org.uk/more-from-us/resources/complaints-handling-guidance

¹⁴ www.fundraisingregulator.org.uk/more-from-us/resources/webinar-handling-complaints

CASE STUDY: when better complaints handling may have prevented escalation

When a complainant raised concerns with the charity that a charity bag had been delivered to their address, the charity forwarded the complaint on to its agency, without acknowledging it. The charity therefore breached the code in relation to handling and investigating complaints.

The agency breached the section of the code that relates to investigating and handling complaints, as it did not ask for supporting evidence of the complaint. It only requested evidence after we became involved, at which point the evidence had been disposed of.

In addition, the charity had not ensured that the agency was aware of the code, or that it had sufficient measures in place to monitor the agency's work to ensure its compliance with the code. The charity had also breached the code in these areas.

We recommended that both the charity and the agency review their complaints policy and process. We also recommended that the charity monitor the agency to ensure its compliance with the code and the agency review its staff training on the code.

Are you committed to the Fundraising Values?

When carrying out any type of fundraising activity your behaviour must be guided by the Fundraising Values. These are the four core values of the code: legal, open, honest and respectful, which underpin the Code of Fundraising Practice. Read our [guidance for fundraisers¹⁵](#) and [advice for the public¹⁶](#) on the behaviours that should underpin all fundraising. We strongly encourage you to tell your supporters about your commitment to the values.



¹⁵ www.fundraisingregulator.org.uk/more-from-us/resources/key-behaviours-guidance-fundraisers

¹⁶ www.fundraisingregulator.org.uk/more-from-us/resources/key-behaviours-advice-public

Complaints received by a sample of large charities between 1 April 2020 and 31 March 2021

Introduction

In this part of the report, we examine the complaints received by 56 of the UK's largest fundraising charities. These household name charities individually spend more than £5 million per year on their fundraising activities. Together they account for a significant proportion of the total amount fundraised from members of the public each year.

While these organisations generate a large sum of fundraised income each year and reach a large number of people, their fundraising is not representative of all charities, particularly those smaller in size. This report is intended to give a general sense of public concerns rather than a complete picture of all fundraising complaints made in the UK.

Read in conjunction with Part 1 of this report (which includes complaints made to the Fundraising Regulator), this analysis gives an overview of broad trends in fundraising complaints. It is intended to help charities identify areas of their practice that may require specific expertise, new processes or more planning to get right.

The Annual Complaints Return (from which the data from charities is compiled) is a voluntary survey sent to charities by the Fundraising Regulator every year. We'd like to thank the charities that have completed this year's return, and that in previous years, for their continued commitment to sharing their data, so that fundraising practices and complaints handling can be improved in all fundraising organisations. These charities are supporting the entire sector to raise standards.

The charities contributing to this report have provided data from 1 April 2020 to 31 March 2021. This includes the times when the UK entered nationwide lockdowns and restrictions on in-person contact were enforced by governments. Restrictions across the UK were different in each nation; some of the charities submitting data to this report only work in one country, while others work across the nations.

The pandemic had a significant impact on charities' ability to fundraise; many had to furlough staff, reduce their operations and adapt to new ways of working. Community and mass participation events, street and private site fundraising and door-to-door fundraising were methods particularly affected. Some charities paused their public fundraising for a period of time, while others stopped altogether. Charities were also conscious of a lack of public appetite for in-person giving, even when restrictions eased. Together, these factors have influenced the complaints charities received during the period.

Table: Fundraising complaints and number of sample charities reporting fundraising complaints over the past three years

Method	No. of fundraising complaints reported by charities					No. of organisations reporting fundraising complaints				
	20/ 21	19/ 20	18/ 19	+/-	% +/-	20/ 21	19/ 20	18/ 19	+/-	% +/-
Online	5,836	1,660	1,278	4,558	357	40	29	26	14	54
Addressed mail	3,687	4,054	5,619	-1,932	-34	53	54	55	-2	-4
Corporate ¹⁷	2,504	108	339	2,165	639	16	13	17	-1	-6
Email	1,534	1,053	1,080	454	42	46	47	39	7	18
Door-to-door	752	2,413	4,094	-3,342	-82	17	25	25	-8	-32
Television advertising	715	430	370	345	93	36	26	24	12	50
Challenge and sponsorship events ¹⁸	681	2,063	2,054	-1,373	-67	23	31	32	-9	-28
Lotteries and raffles ¹⁹	515	959	774	-259	-33	36	33	34	2	6
Telephone	509	1,040	550	-41	-7	38	36	41	-3	-7
Social events ²⁰	375	1,757	677	-302	-45	12	14	16	-4	-25
Volunteer	120	440	261	-141	-54	10	24	21	-11	-52
Private site	115	1,402	1,226	-1,111	-91	19	32	35	-16	-46
Unaddressed mail	109	94	136	-27	-20	17	17	17	0	0
Charity bags ²¹	86	203	1,110	-1,024	-92	5	8	6	-1	-17
Static collections fundraising ²²	60	308	225	-165	-73	6	16	15	-9	-60
SMS	55	130	185	-130	-70	8	13	16	-8	-50
Street	51	236	349	-298	-85	6	13	11	-5	-45
Free draws and prize competitions ²³	43	72	118	-75	-64	5	5	5	0	0
Major donor	16	26	28	-12	-43	9	11	9	0	0
Radio advertising	14	17	14	0	0	3	6	6	-3	-50
Trusts and foundation	10	7	7	3	43	8	6	6	2	33
Print media ²⁴	9	70	37	-28	-76	4	8	12	-8	-67
Public outdoor advertising ²⁵	4	27	10	-6	-60	2	6	6	-4	-67
Total complaints	17,800	18,569	20,541							

17 Formerly 'Fundraising from businesses'

18 Formerly 'Outdoor events'

19 Formerly separate categories

20 Formerly 'Social activities'

21 Formerly 'Clothing collections'

22 Formerly 'Cash collections'

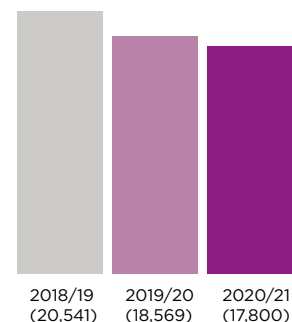
23 Formerly 'Other prize draws'

24 Formerly 'Press advertising' and 'Magazine and news inserts'

25 Formerly 'Outdoor advertising'

Fundraising during the COVID-19 pandemic

For the third year in a row there has been a decrease in the number of complaints received by charities contributing to this report, which aligns with a decrease in in-remit complaints escalated to the Fundraising Regulator. While this is likely to be a result of activity being paused during 2020/21, another contributing factor could be that members of the public were concerned with other issues, and therefore not raising complaints about charitable fundraising. However, the continued decrease in complaints may also point to better compliance with the standards, reducing cause for complaints.



Graph: Total complaints over the past three years

The number of charities carrying out methods of fundraising that do not involve person-to-person contact, such as telephone fundraising and unaddressed mail has remained fairly consistent over the past three years. While most organisations did not rush into trying new methods of fundraising, some did pivot their activity, and it would appear from the complaints data, in a fully compliant manner for the most part.

Against the backdrop of the pandemic, it may have been anticipated that fundraising complaints would have increased. Yet there is little evidence to suggest that fundraising standards fell during the pandemic, as the overall number of complaints continued to decline.

Complaints decrease for in-person fundraising methods

Charities reported a drop in the number of complaints for methods that involved in-person contact, compared to those figures reported in 2018/19. These are: door-to-door fundraising; private site face-to-face fundraising; street fundraising; and events fundraising. This is likely due to restrictions on the use of public and private places and charities choosing to pause activity. Some of these activities, in particular events fundraising, would have involved the use of volunteers. The data also shows that complaints about volunteers have decreased by 54% over the past three years.

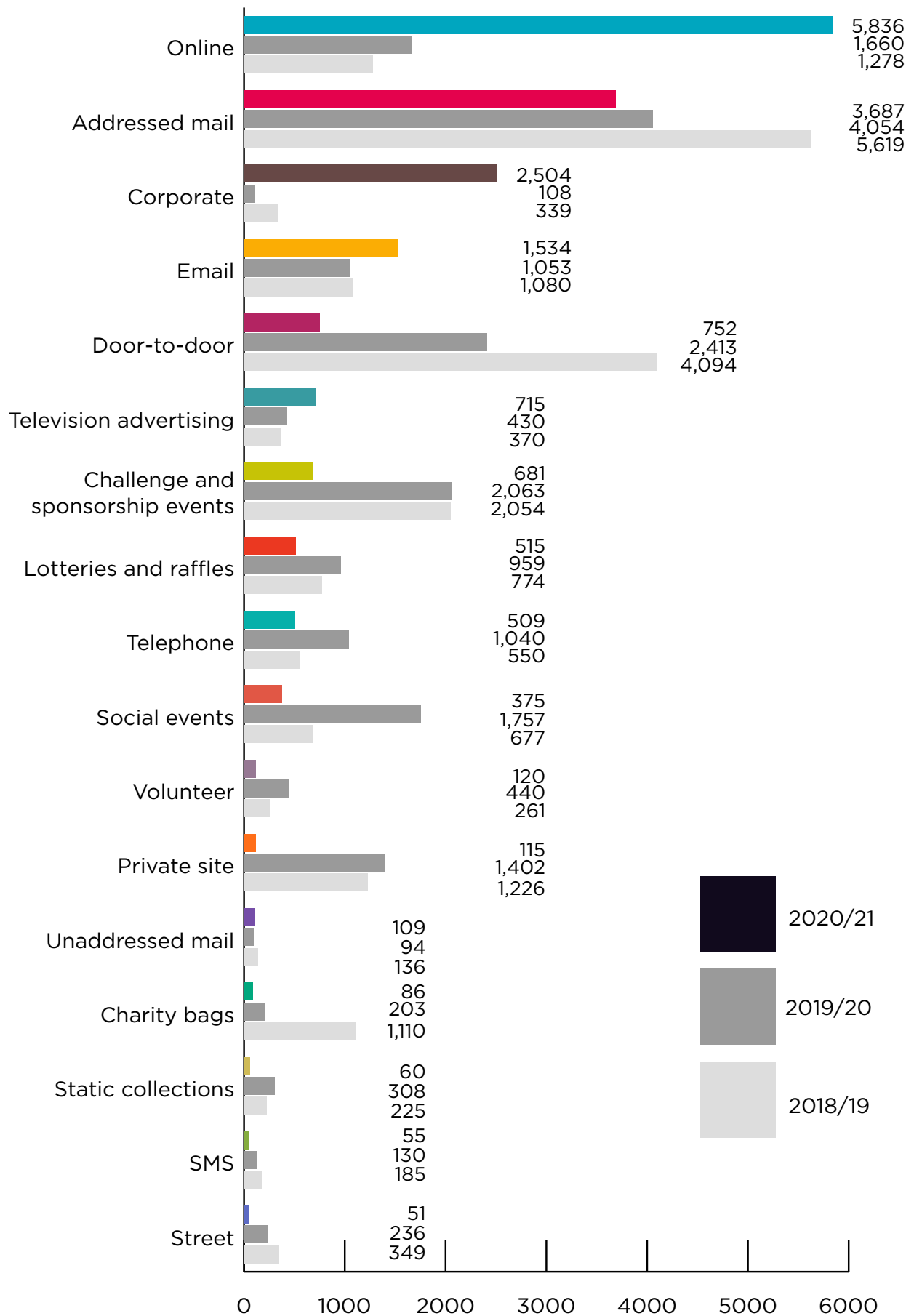
Online fundraising complaints increase

Almost all charities reported that complaints related to online fundraising had increased since 2018 (+357%). We define online fundraising as: a fundraising ask that is hosted on a website and is aimed at an online audience. This can include a charity's own website, advertising banners or pop-ups on third-party websites, as well as social media and online fundraising platforms. In addition, other digital methods, such as email fundraising, have seen a notable increase in complaints since 2018 (+42%).

We know that many charities focused on digital methods of fundraising during the pandemic as we all spent increasing amounts of time online, and this is reflected in the rise in public concerns. Research from CAF in 2020 found that only one in five charity leaders say they know how to manage online fundraising effectively²⁶, which may explain why we've seen many complaints in this area.

26 Charities Aid Foundation, Charity Landscape 2020; www.cafonline.org/about-us/publications/2020-publications/charity-landscape-2020

Graph: Complaints reported for each fundraising method



As technology evolves, so do the opportunities for charities to harness online fundraising in new ways, but charities must proceed with caution.

Charities should focus on continually upskilling their fundraising teams and senior leaders on digital methods to effectively fundraise online and mitigate the risk of breaching the code. In 2022, the Fundraising Regulator will begin a review of the code, to make sure that it remains up to date and reflects good practice in fundraising. The review will consider whether existing standards in the code related to digital fundraising are sufficient to support the sector, or whether changes are needed in this area.

Complaints about other non-contact methods did not increase

The data shows that complaints about corporate fundraising have significantly increased over the past three years (+639%). But there is a caveat to this; a high proportion of the complaints in 2020/21 were concerns about one particular fundraising campaign, rather than reflective of complaints received about corporate fundraising across all charities.

Complaints about addressed mail have continued on a downward trajectory over the past three years. The charities that provided data on complaints didn't increase their addressed mail fundraising, even though this method would have been relatively safe to carry out during the pandemic. Yet Part 1 of this report highlights addressed mail as frequently complained about.

Complaints about telephone fundraising and SMS fundraising also tell a similar story to addressed mail. These methods saw a decrease in complaints and the number of charities carrying out this activity, even though they were methods available to charities throughout the pandemic.

In 2020/21 there was a decrease in the number of organisations reporting complaints about lotteries and raffles fundraising, but a slight increase in the number of charities carrying out this method. In-person recruitment for lotteries would have had to pause because of the pandemic, but online lotteries would have gone ahead. Looking at supporting data from our enquiries service, we saw a 10% increase in people asking questions about lotteries from June to August 2020, which supports the finding that more charities carried out lottery fundraising.

Methods of fundraising most likely to result in complaints

We use ratios to understand whether a method of fundraising is likely to result in a complaint to a charity. We do this by comparing the total complaints with total activity numbers. The table below shows the top five fundraising methods that generate the most complaints proportionate to the volume of activity carried out.

Table: Methods of fundraising most likely to result in complaints

Method of fundraising	Ratio of complaints to fundraising activity
Corporate	1:4
Street	1:129
Private site	1:450
Volunteer	1:564
Social events	1:965

The high ratio of complaints about corporate fundraising is due to one charity's data. This high ratio is not reflective of all large charity fundraising complaints in 2020/21. Nonetheless, this does show that while corporate fundraising is effective because it reaches a wide audience, it does have the ability to generate a lot of complaints if the partnership is not carefully thought through or if concerns come to light about the company involved. Some of the areas charities should consider when engaging in a corporate fundraising campaign are:

- Consider public sentiment about your potential corporate partner – is the company involved in any contentious matters?
- Do you have a contingency plan in place if a reputational issue emerges about your corporate partner?
- Do the corporate partner's values align with your charity's own mission, vision and ethical standards?

The remaining methods in this table are in-person fundraising. Street fundraising is by far the most frequently complained about in-person method. Despite these methods being paused at points throughout the reporting year and the level of activity declining overall, we did still see a considerable number of complaints. Although we are unable to make a direct comparison with ratios reported latest year (see methodology on page 27), we can see that private site, social events and volunteer fundraising also had a high ratio of complaints last year. This suggests that these methods are likely to be of consistent concern to members of the public.

Complaints by fundraising method

This section looks closely at the total complaints received by the 56 charities contributing to this report against each method of fundraising. See the glossary in the Annex for a definition of each method.

Methodology

We asked charities to record their activity and the number of complaints they received for 25 fundraising methods. We also asked charities, where possible, to provide data for the reasons for complaints that were made about the fundraising activity. Graphs from 28 page onwards show (in %) the main reasons for each complaint.

For some methods of fundraising, there are very few complaints recorded against them and even fewer reasons for the complaint. We advise readers to interpret this data with caution, as it is not representative of fundraising complaints made to charities.

Not all charities provide us with data about the reasons for a complaint. Charities can also provide more than one reason for a complaint, as complaints may have more than one cause. This means that, the percentages cited in these graphs may add up to more or less than 100%.

In 2020, we engaged with the charities that submit their data to this report to identify ways of improving the Annual Complaints Return survey. We have made some small changes to this year's survey following that engagement and would like to thank all those charities who spoke to us. We made changes to how we categorise complaints and record volumes of activity. These changes mean that direct comparison with previous year's data isn't possible.

In 2020/21 we asked charities to report their volume of activity whether they had recorded complaints against a method or not. In previous years, charities only reported activity when they had recorded a complaint against it. This change provides a more accurate picture of the ratio of complaints received. But it also means that it is not possible to directly compare 2020/21 ratios with ratios from previous years, although the figures do give a general indication of public concern.

We do not provide a definition of what constitutes a complaint to the charities contributing to this report. Charities may have recorded the complaints made to them differently and therefore the complaints in this report reflect what the individual charity has treated as a complaint, rather than a universal standard.



Between 2019/20 and 2020/21 there was a 252% increase in the number of complaints about online fundraising. This follows what we know about charities opting for digital methods of fundraising during the pandemic.

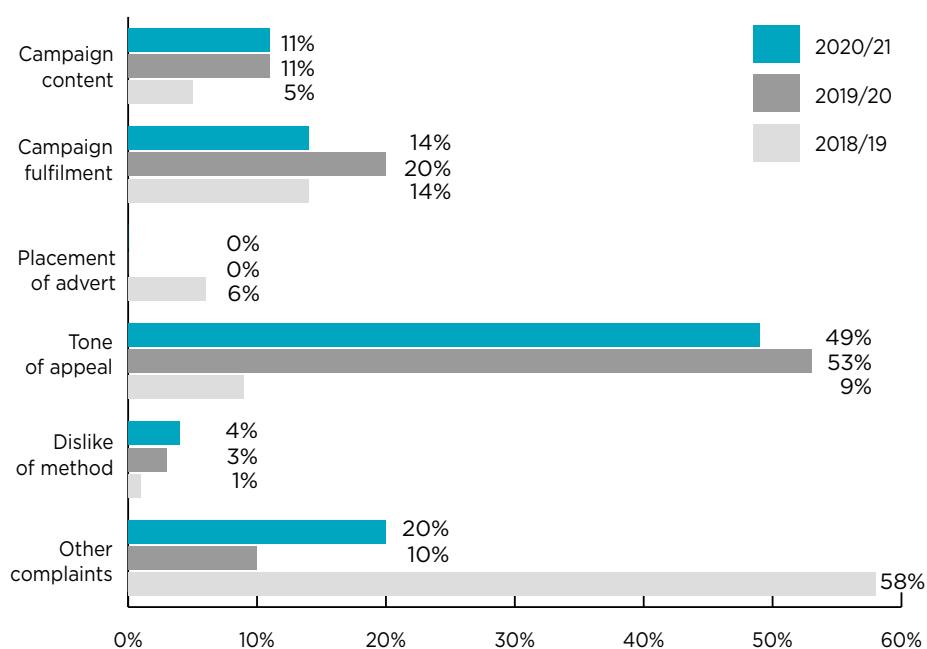
The data finds that 71% of organisations that used this method received a complaint; a 19% increase from 2019/20. The most common theme for complaints was tone of appeal, which was a concern in nearly half of all complaints. The tone of an appeal relates to how the advert is shown, where the advert is placed and the language/imagery in it.

Yet despite the increase in complaints, the numbers reported are relatively small when compared the level of activity carried out, with every 1 impression in 1,886,192 receiving a complaint.

Table: Summary of complaints and activity for the past three years

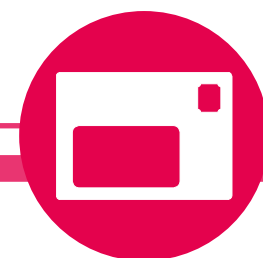
Online fundraising	2020/21	2019/20	2018/19
No. of orgs using online fundraising	53	54	58
% of orgs using method	95%	96%	100%
Total no. of impressions ²⁷	11,007,815,009	5,452,354,513	2,977,252,116
No. of orgs reporting complaints	40	29	26
% of orgs reporting complaints	71%	52%	45%
Total no. of complaints	5,836	1,660	1,278
Complaint to no. of impressions ratio	1:1,886,192	1:3,284,551	1:2,329,618

Graph: Reason(s) for a complaint for the past three years



²⁷ Please note, due to a change in reporting categories in 2020/21, the data for 2019/20 and 2018/19 relates to total adverts served, not total impressions. Impressions are the total number of times an advert is displayed to people online. This year's online fundraising method definition was also expanded to ask for data in relation to social media fundraising.

Addressed mail



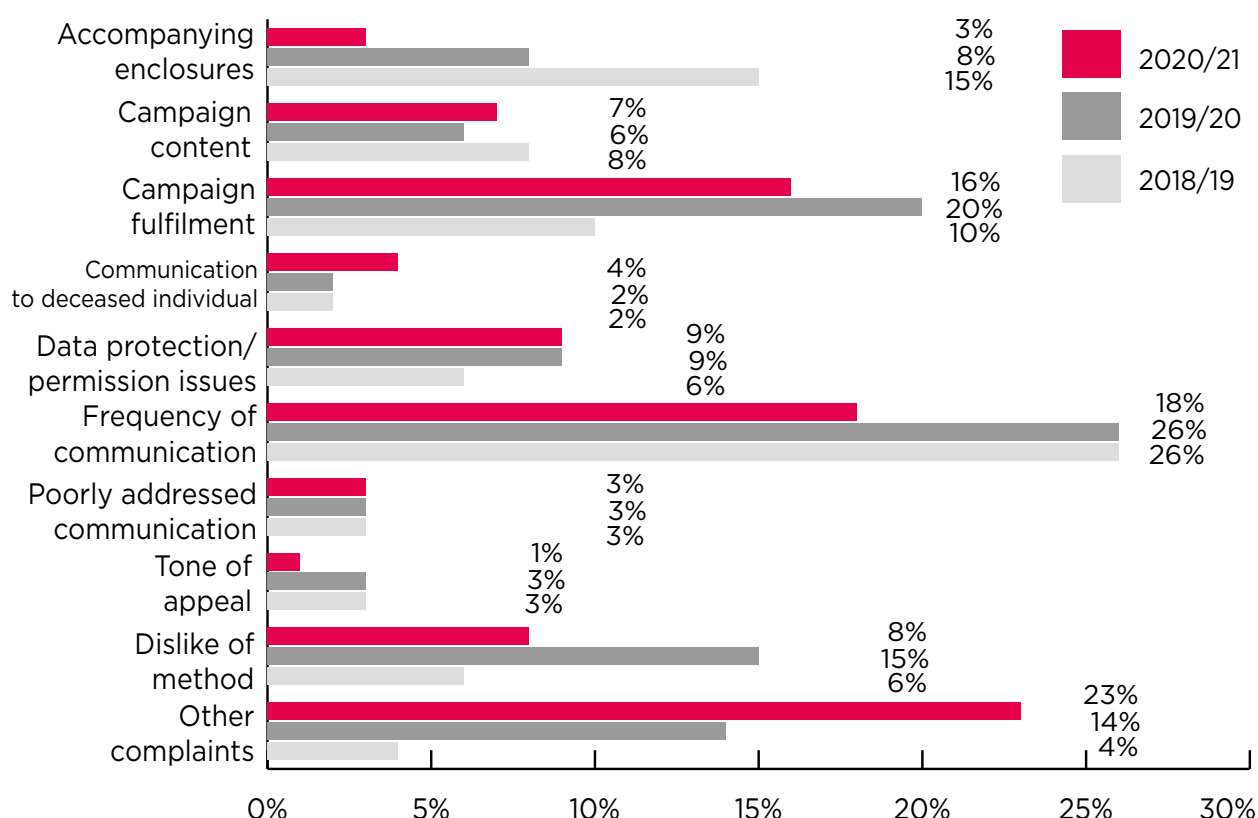
This is the first year (since 2017) that addressed mail is not the most complained about method of fundraising reported by charities. All charities contributing to this report use addressed mail as a method of fundraising, and the number of charities that receive complaints about this method has remained consistent over the past three years.

There has been a steady, year-on-year, decrease in the number of complaints about this method, and this mirrors the decrease in volume of activity. Concerns about accompanying enclosures and a general dislike of the method have declined, yet we are seeing similar levels of complaints about campaign content and data protection issues.

Table: Summary of complaints and activity for the past three years

Addressed mail fundraising	2020/21	2019/20	2018/19
No. of orgs using addressed mail	56	56	58
% of orgs using method	100%	100%	100%
Total no. of pieces of addressed mail sent	63,200,944	70,834,507	78,624,313
No. of orgs reporting complaints	53	54	55
% of orgs reporting complaints	95%	93%	95%
Total no. of complaints	3,687	4,054	5,619
Complaint to contact ratio	1:17,142	1:17,473	1:13,993

Graph: Reason(s) for a complaint for the past three years





For the second year in a row, all charities reported using email fundraising, and 46 charities received a complaint about this method. This is similar to the previous year.

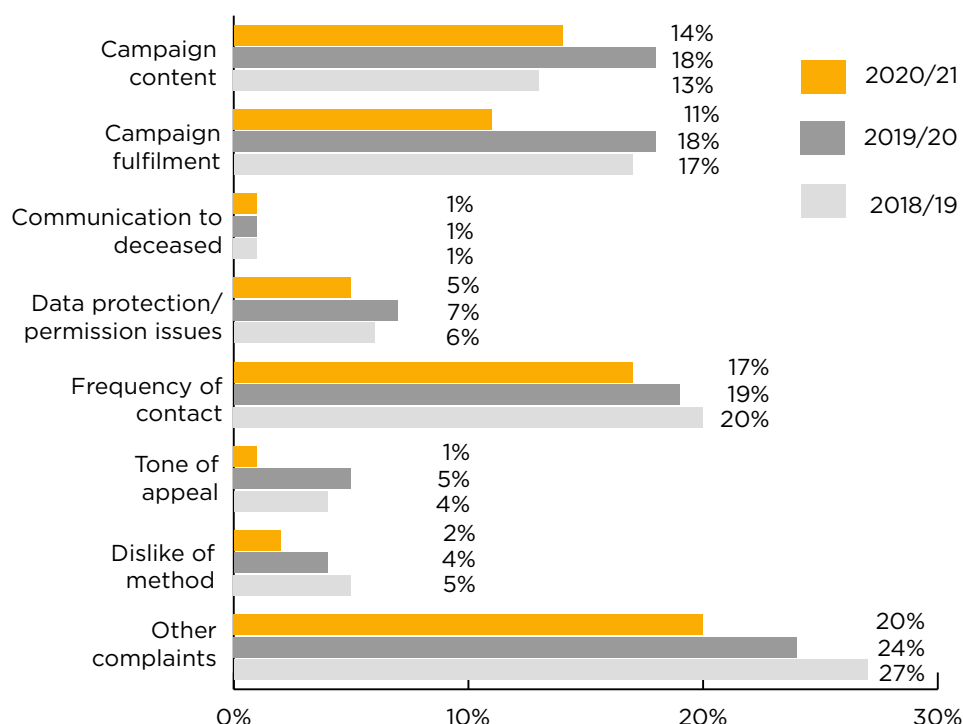
In 2020/21, a large number of emails were sent out by organisations, which correlates with a significant rise in the number of complaints received (from 1,080 complaints in 2018/19 to 1,534 in 2020/21). Activity numbers, and therefore complaints, have probably risen as charities used emails more while in-person fundraising was restricted.

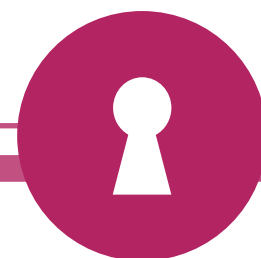
The reasons for email fundraising complaints have remained consistent over the past three years, with only minor changes. It is encouraging to see complaints about campaign content and campaign fulfilment decrease, as this could suggest charities are getting better at making sure their messaging is appropriate.

Table: Summary of complaints and activity for the past three years

Email fundraising	2020/21	2019/20	2018/19
No. of orgs using email fundraising	56	56	57
% of orgs using method	100%	100%	98%
Total emails sent by orgs	271,330,526	112,812,622	96,730,770
No. of orgs reporting complaints	46	47	39
% of orgs reporting complaints	82%	84%	67%
Total no. of complaints	1,534	1,053	1,080
Complaint to emails sent ratio	1:176,878	1:107,134	1:89,566

Graph: Reason(s) for a complaint for the past three years





The number of charities using door-to-door fundraising dropped in 2020/21, from 25 charities to 14 charities. This is also mirrored in a significant reduction in the number of households visited. This follows what we know about the pandemic preventing fundraisers interacting with the public. All charities that used this method in 2020/21 received complaints about it, which is consistent with 2019/20 and 2018/19, suggesting that door-to-door fundraising is a particularly contentious method for the public.

The data presents a curious finding: more charities received complaints about door-to-door fundraising than carried out this method. This could suggest members of the public had come into contact with fraudulent door-to-door fundraisers, and subsequently reported this to the genuine charity. A few charities did report to us that they received complaints in relation to door-to-door activity which they considered to be fraudulent as the charity had not undertaken any door-to-door fundraising in that area. Alternatively, members of the public may have mistaken which charities knocked on their door. In either scenario, it is positive to see charities recording these complaints as part of comprehensive record keeping, even when they did not carry out the activity.

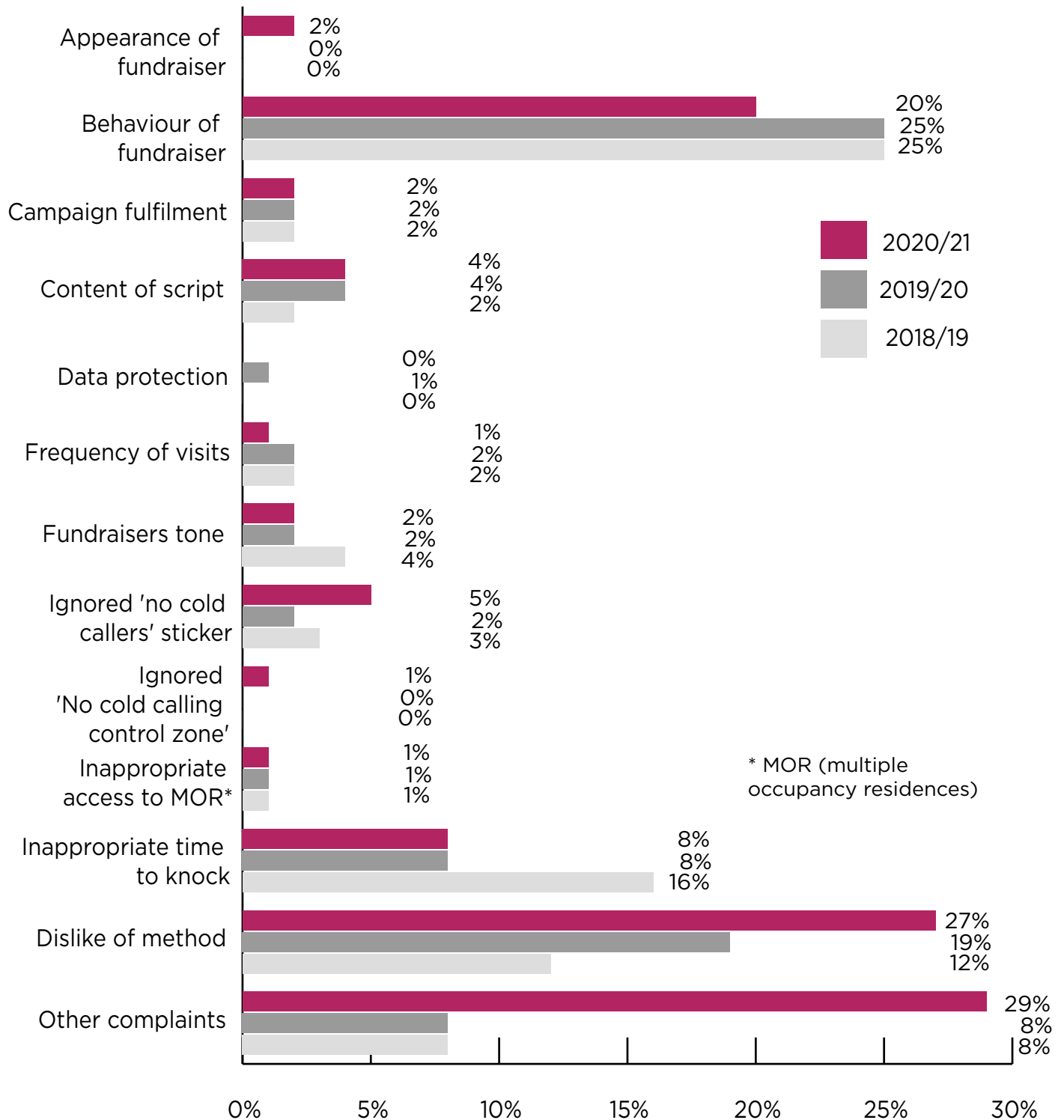
Behaviour of the fundraiser, dislike of this method and inappropriate time to knock remained the top three reasons for complaints in 2020/21, continuing the trend from 2019/20 and 2018/19. Other complaints also saw an increase in 2020/21. Most of the 'other' complaints were due to members of the public complaining that door-to-door fundraising was taking place during the pandemic.

Table: Summary of complaints and activity for the past three years

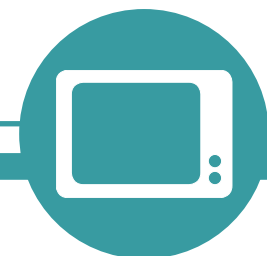
Door-to-door fundraising	2020/21	2019/20	2018/19
No. of orgs using door-to-door fundraising	14	25	25
% of orgs using method	25%	45%	43%
Total no. of households visited	3,579,338	18,013,114	24,526,886
No. of orgs reporting complaints	17	25	25
% of orgs reporting complaints	30%	45%	43%
Total no. of complaints	752	2,413	4,094
Complaint to contact ratio	1:4,760	1:7,465	1:5,991



Graph: Reason(s) for a complaint for the last three years



Television advertising



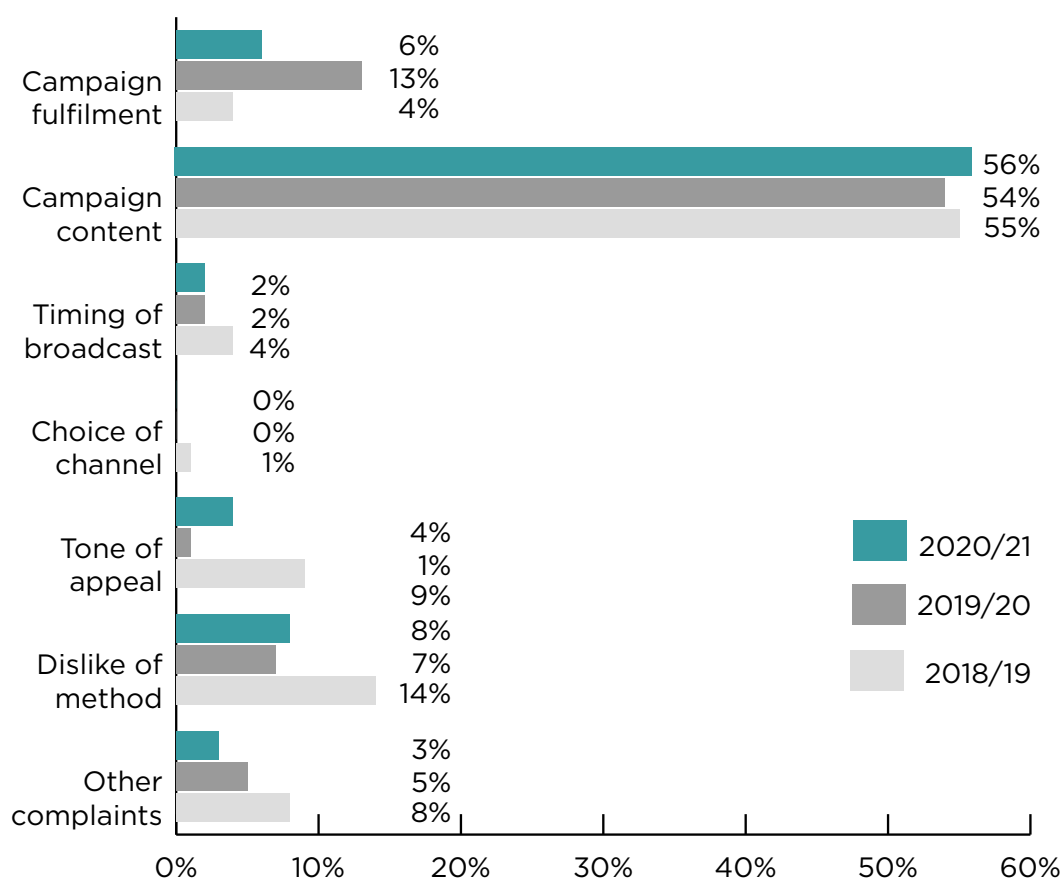
The number of complaints reported about TV advertising has increased by 66% since last year. We can see that more charities are using this method than in previous years, which coincides with more charities reporting complaints about TV advertising. For the third year running, campaign content (at 56%) was by far the most frequently cited concern.

The ratio of complaints to activity for this method is positive. In 2020/21 there was a chance that one view in 14 million would generate a complaint.

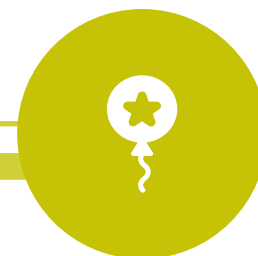
Table: Summary of complaints and activity for the past three years

Television advertising	2020/21	2019/20	2018/19
No. of orgs using TV advertising	46	41	39
% of orgs using method	82%	73%	67%
Total audience reach	10,442,176,337	5,747,334,330	6,206,130,906
No. of orgs reporting complaints	36	26	24
% of orgs reporting complaints	64%	46%	41%
Total no. of complaints	715	430	370
Complaint to audience reach ratio	1:14,604,442	1:13,365,894	1:16,773,327

Graph: Reason(s) for a complaint for the past three years



Challenge and sponsorship events



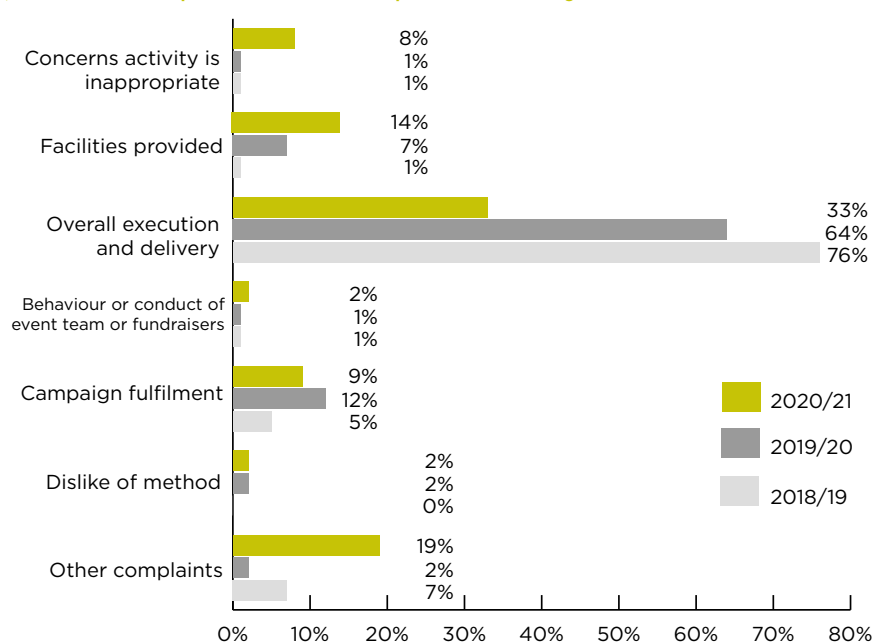
Despite pandemic-related restrictions preventing charities carrying out events²⁸ in person, the number of charities using this method of fundraising has remained consistent with previous years. Yet there were fewer charities reporting complaints about this method in 2020/21 and the total number of complaints also reduced by 67%. This suggests that while the fundraising activity may have taken place in this reporting year, the actual event may have been postponed or moved online, resulting in fewer complaints but the same number of charities reporting this activity. Some charities may have recorded their online events fundraising under the 'online' category in the Annual Complaints Return.

There was a considerable reduction in complaints related to overall execution and delivery of activity. However, there was a rise in the number of complaints related to either concerns that the activity is inappropriate or about the facilities provided. Again, this could be related to charities moving challenge and sponsorship events online.

Table: Summary of complaints and activity for the past three years

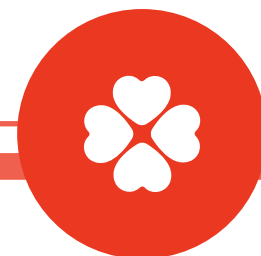
Challenge and sponsorship events fundraising	2020/21	2019/20	2018/19
No. of orgs using c. and s. events	43	42	40
% of orgs using method	77%	75%	69%
Total no. of participants	4,730,571	6,110,249	6,111,257
No. of orgs reporting complaints	23	31	32
% of orgs reporting complaints	41%	55%	55%
Total no. of complaints	681	2,063	2,054
Complaint to no. of participants ratio	1:6,947	1:2,962	1:2,975

Graph: Reason(s) for a complaint for the past three years



²⁸ Please note, this fundraising method was previously called 'outdoor events'. This fundraising method was changed in 2020/21 to 'challenge and sponsorship events' to bring the definition in line with the Code of Fundraising Practice. See glossary on page 50 for the full definition.

Lotteries and raffles

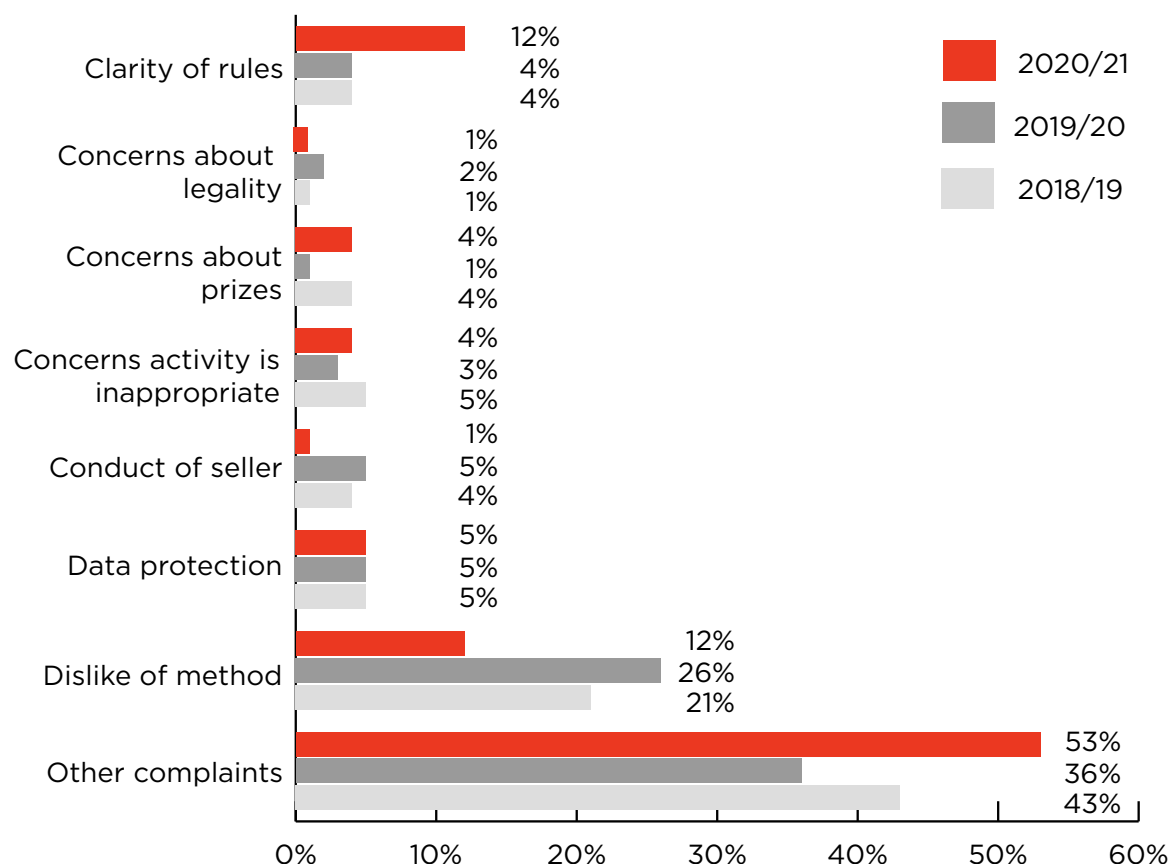


In 2020/21, 40 organisations used this method of fundraising, of which 36 received complaints²⁹. The most common reasons for complaints were, dislike of method, concerns that the activity is inappropriate and concerns over data collections. There was a large number of 'other' complaints, which relate to admin/processing errors, limitations on being able to play online/within certain devolved countries and issues with taking payments from players.

Table: Summary of complaints and activity for the past three years

Lotteries and raffles fundraising	2020/21	2019/20	2018/19
No. of orgs using lotteries and/or raffles	40	33	34
% of orgs using method	71%	59%	59%
Total lottery or raffle tickets sold	69,320,978	96,438,253	61,509,210
No. of orgs reporting complaints	36	33	34
% of organisation reporting complaints	64%	59%	59%
Total no. of complaints	515	959	774
Complaint to tickets sold ratio	1:134,604	1:100,561	1:79,469

Graph: Reason(s) for a complaint for the past three years



²⁹ Please note, in 2020/21, we made changes to this report and as part of that we combined lotteries and raffles into one reporting category. Prior to that, they were two separate categories. We made this change because raffles are a form of lottery.



The data shows no evidence of charities carrying out more telephone fundraising during the pandemic. The number of organisations using telephone fundraising has remained consistent over the past three years.

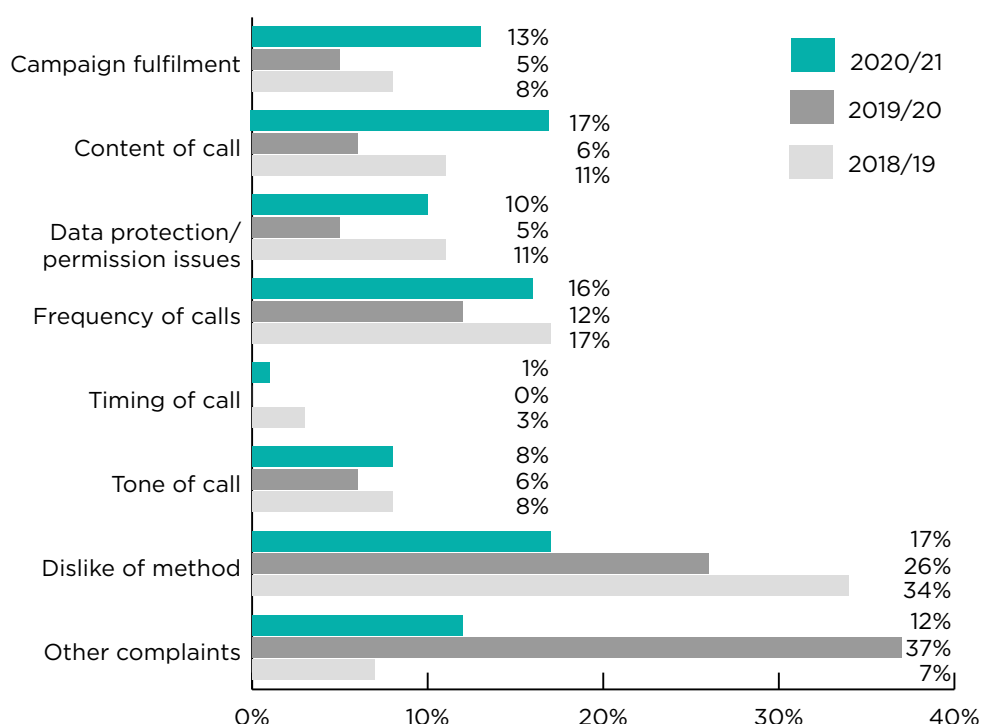
The number of charities receiving complaints about this method has only increased slightly in the most recent year (36 in 2019/21 to 38 in 2020/21), yet this figure is still down on that reported in 2018/19 (41 organisations reporting complaints).

Complaints about telephone fundraising have more than halved between 2019/20 and 2020/21. However, it is possible that the number of complaints is returning to more normal levels, after a spike last year. Complaints about telephone fundraising were most likely to be about a dislike of the method and the content and frequency of the call. It is encouraging to see that far fewer people cited dislike of method than in previous years.

Table: Summary of complaints and activity for the past three years

Telephone fundraising	2020/21	2019/20	2018/19
No. of orgs using telephone fundraising	46	46	47
% of orgs using method	82%	82%	81%
Total no. of fundraising calls made	2,124,924	2,228,766	2,161,525
No. of orgs reporting complaints	38	36	41
% of orgs reporting complaints	68%	64%	71%
Total no. of complaints	509	1,040	550
Complaint to calls made ratio	1:4,175	1:2,143	1:3,930

Graph: Reason(s) for a complaint for the past three years



Social events



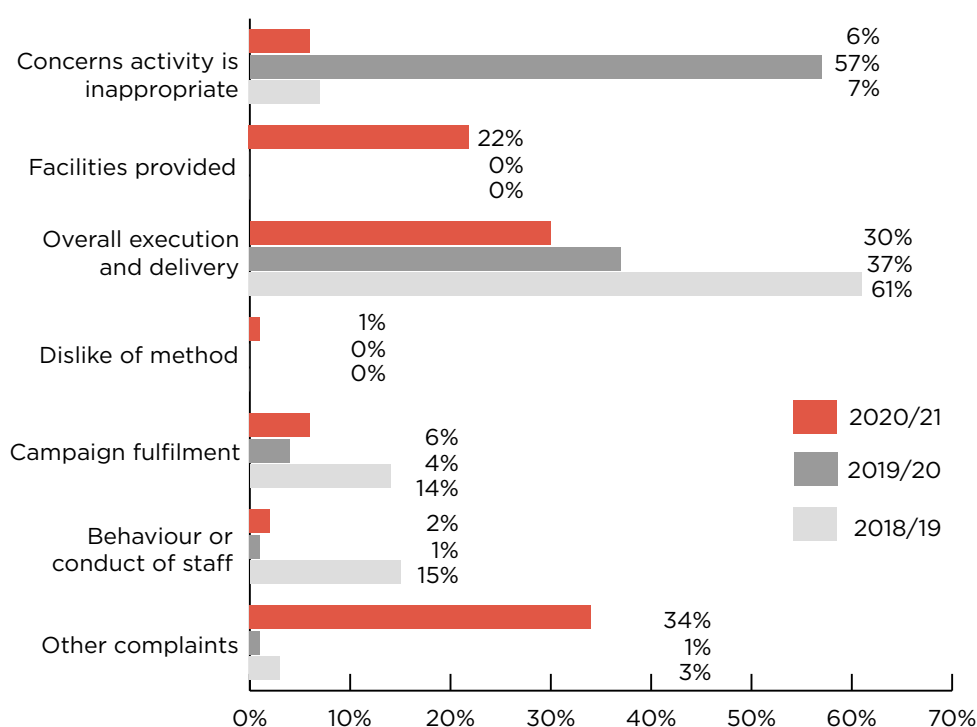
Despite pandemic-related restrictions on in-person fundraising such as events, tickets sales for social events³⁰ remained buoyant for 2020/21. However, the number of complaints decreased dramatically, from 1,757 in 2019/20 to just 375 in 2020/21.

Complaints included concerns about facilities provided, which could be because charities moved their social events online. Overall delivery and execution of the event was also a commonly cited reason for complaints, yet this is down on previous years. 'Other' complaints also increased in 2020/21. The majority of these were in relation to members of the public complaining about the thank you (or lack thereof) they received after an event.

Table: Summary of complaints and activity for the past three years

Social events fundraising	2020/21	2019/20	2018/19
No. of orgs using social events fundraising	21	29	31
% of orgs using method	38%	52%	53%
Total tickets sold	361,715	453,210	470,119
No. of orgs reporting complaints	12	14	16
% of orgs reporting complaints	21%	25%	28%
Total no. of complaints	375	1,757	677
Complaint to tickets sold ratio	1:965	1:258	1:694

Graph: Reason(s) for a complaint for the past three years



³⁰ Please note, the glossary definition for this method of fundraising was changed in 2020/21 from 'social activities' to make it clearer that category relates to events, potentially with ticketed entry, and which have a social aspect, such as a pub quiz.

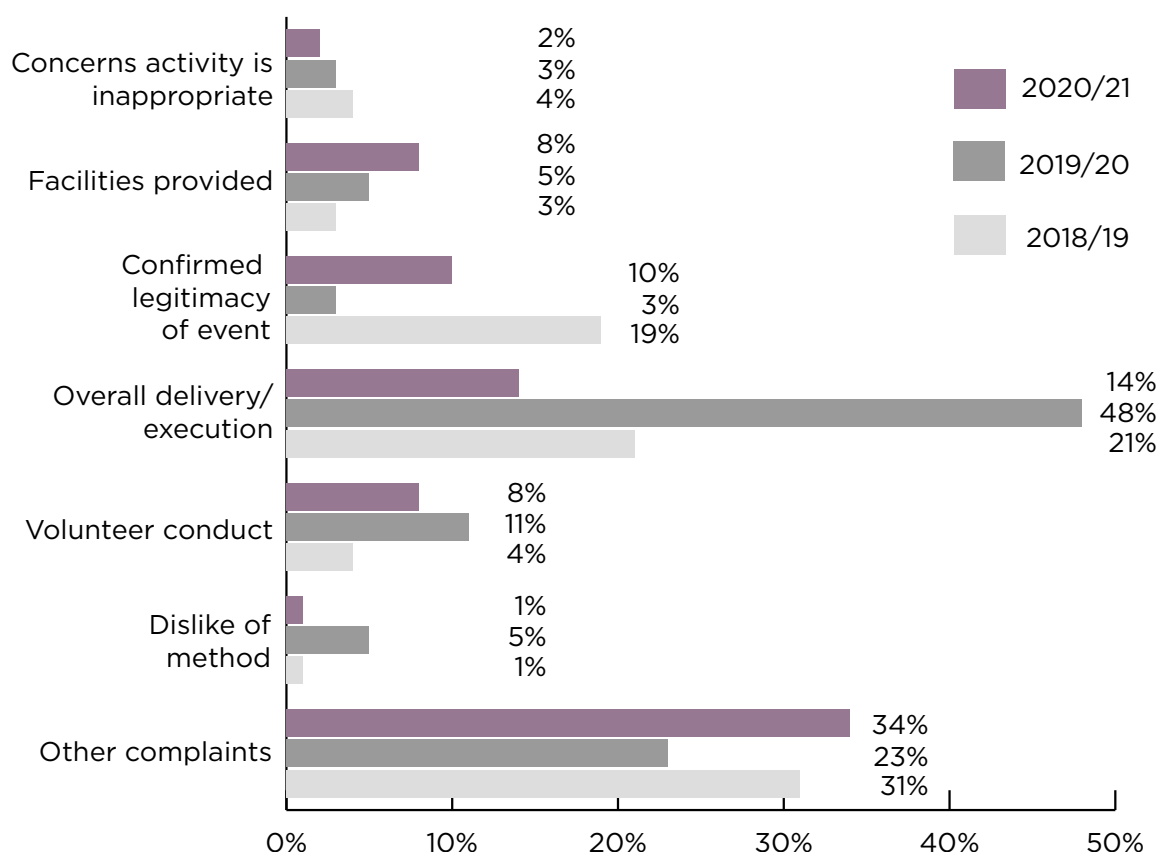


Complaints about volunteer fundraising have fallen significantly over the past year (down from 440 in 2019/20 to 120 in 2020/21). There was also a drop in the number of charities fundraising via volunteers, down from 37 in 2019/20 to 32 in 2020/21. Volunteers usually undertake in-person methods of fundraising, so the reduction in complaints aligns with a decline in activity. The reason for most complaints was cited as 'other', which includes a range of concerns related to gift aid, materials provided and general admin.

Table: Summary of complaints and activity for the past three years

Volunteer fundraising	2020/21	2019/20	2018/19
No. of orgs using volunteer fundraising	32	37	36
% of orgs using method	57%	66%	62%
Total 'on-behalf-of' events run by volunteer fundraisers	67,739	74,104	100,741
No. of orgs reporting complaints	10	24	21
% of orgs reporting complaints	18%	43%	36%
Total no. of complaints	120	440	261
Complaint to 'on-behalf-of' events ratio	1:564	1:168	1:386

Graph: Reason(s) for a complaint for the past three years



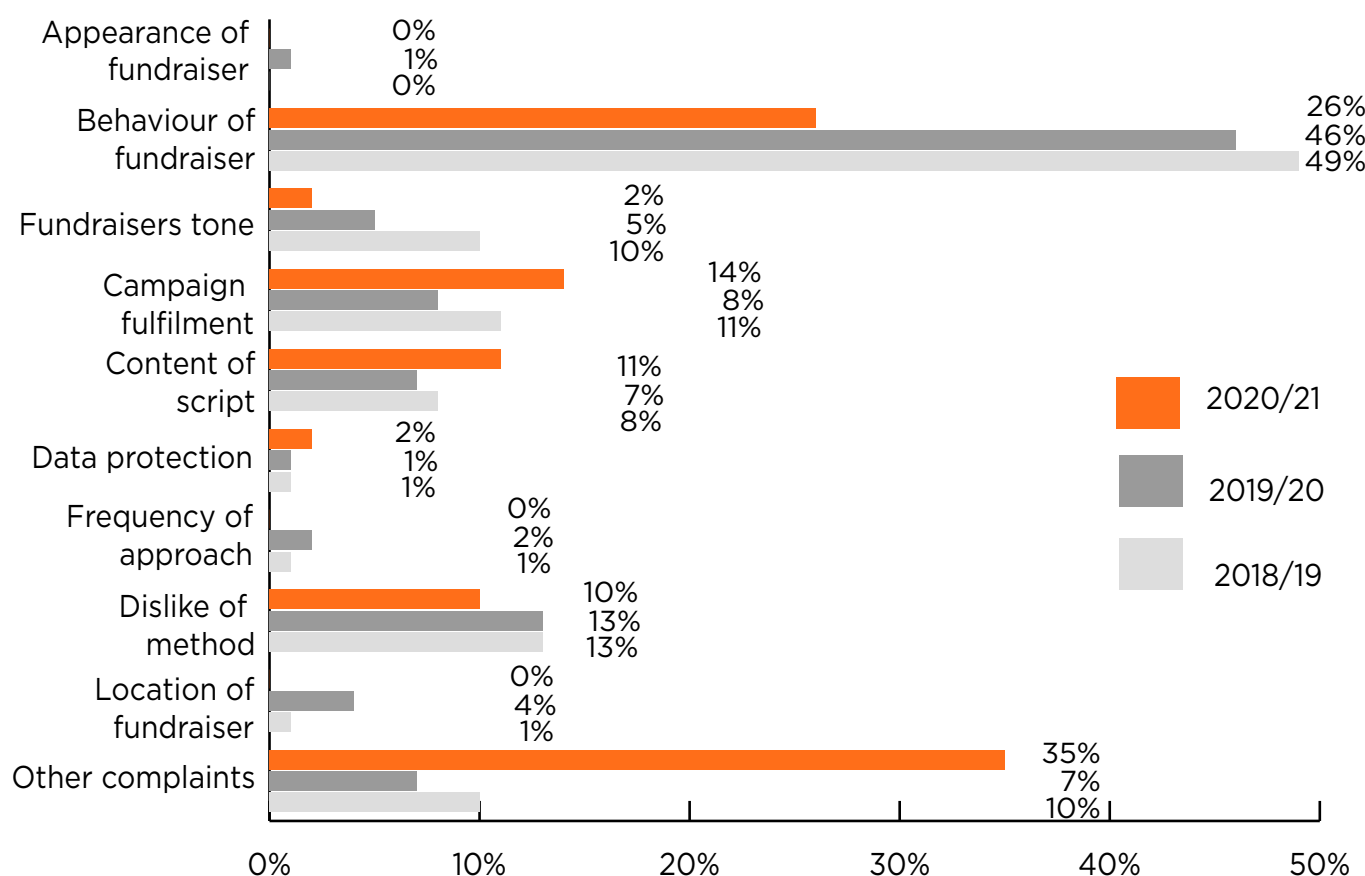


Complaints about private site fundraising declined in 2020/21 by 92% and far fewer charities carried out this method compared to the previous year. This is likely a result of pandemic restrictions. Most charities that fundraised at a private site received complaints about this method. Although fewer charities carried out this method, the proportion of complaints to activity has remained similar to last year. Behaviour of fundraiser was, for the third year, the most frequent reason for a complaint.

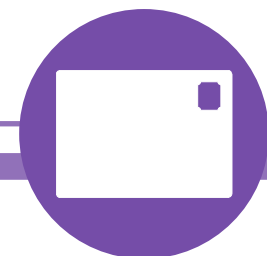
Table: Summary of complaints and activity for the past three years

Private site fundraising	2020/21	2019/20	2018/19
No. of orgs using private site fundraising	21	34	38
% of orgs using method	38%	61%	66%
Total no. of private site sign ups	51,723	586,397	525,319
No. of orgs reporting complaints	19	32	35
% of orgs reporting complaints	34%	57%	60%
Total no. of complaints	115	1402	1226
Complaint to sign up ratio	1:450	1:418	1:428

Graph: Reason(s) for a complaint for the past three years



Unaddressed mail



The number of organisations fundraising via unaddressed mail has broadly remained consistent between 2019/20 and 2020/21, yet the number of complaints recorded for this method has moderately increased by 16%.

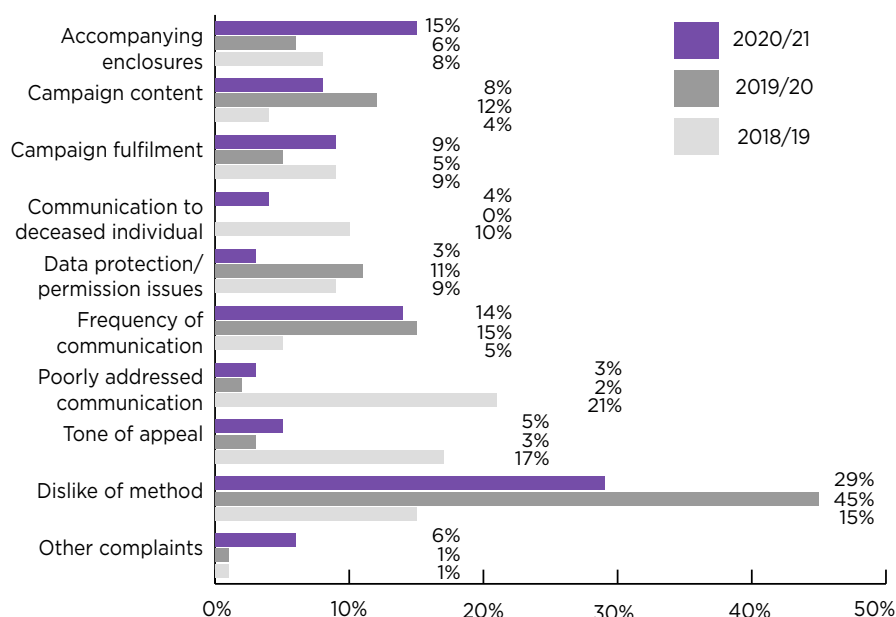
In 2020/21 there was a significant drop in the number of complaints due to dislike of method, yet this remains the most common reason for unaddressed mail complaints. Complaints about accompanying disclosures saw a notable increase – this is an interesting finding as complaints about accompanying disclosures dropped for addressed mail. Frequency of communication is also a common reason for these complaints, which was also a key theme last year.

In 2020/21 there was roughly a one in a million chance of a piece of unaddressed mail generating a complaint. This is the most positive ratio we've seen over the past three years and shows that unaddressed mail is a 'low risk' fundraising methods in terms of complaints.

Table: Summary of complaints and activity for the past three years

Unaddressed mail fundraising	2020/21	2019/20	2018/19
No. of orgs using unaddressed mail	25	26	23
% of orgs using method	45%	46%	40%
Total no. of pieces of unaddressed mail sent	102,112,739	35,454,965	102,337,921
No. of orgs reporting complaints	17	17	17
% of orgs reporting complaints	30%	30%	29%
Total no. of complaints	109	94	136
Complaint to pieces sent ratio	1:936,814	1:377,180	1:752,485

Graph: Reason(s) for a complaint for the past three years



Charity bags



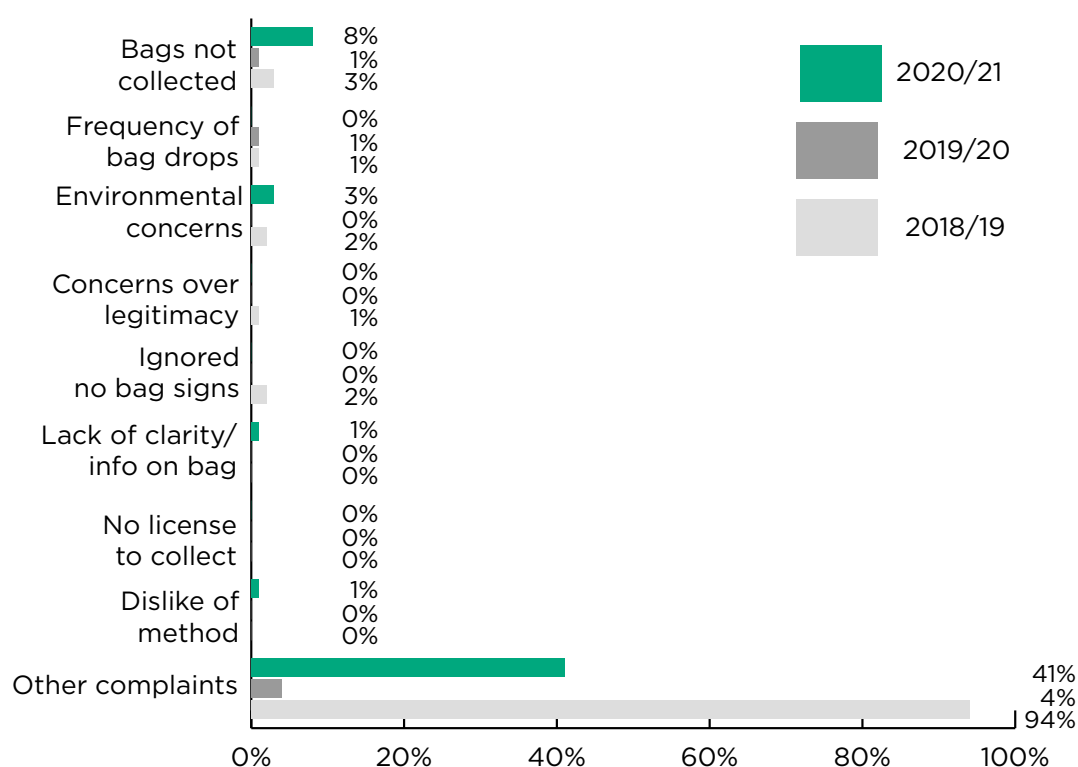
Although charity bags³¹ are consistently the most complained about method in Part 1 of this report, charities that contribute their data to Part 2 do not report many complaints in this area. The number of large charities using charity bags to fundraise is low, which suggests that this method is more often used by smaller and medium-sized charities.

The number of large charities using charity bags to fundraise has decreased every year and in 2020/21, just six charities fundraised in this way. The number of complaints is decreasing dramatically too. Where complaints were made, the main reason cited was 'other', which was due to an organisation receiving complaints over the behaviour of the collector.

Table: Summary of complaints and activity for the past three years

Charity bags fundraising	2020/21	2019/20	2018/19
No. of orgs using charity bags fundraising	6	7	10
% of organisations using method	11%	13%	17%
Total bags distributed	4,177,605	17,905,686	20,237,585
No. of orgs reporting complaints	5	8	6
% of orgs reporting complaints	9%	14%	10%
Total no. of complaints	86	203	1,110
Complaint to bags distributed ratio	1:48,577	1:88,205	1:18,232

Graph: Reason(s) for a complaint for the past three years



³¹ Please note, the glossary definition for this method of fundraising was changed in 2020/21 from clothing collections to charity bags.



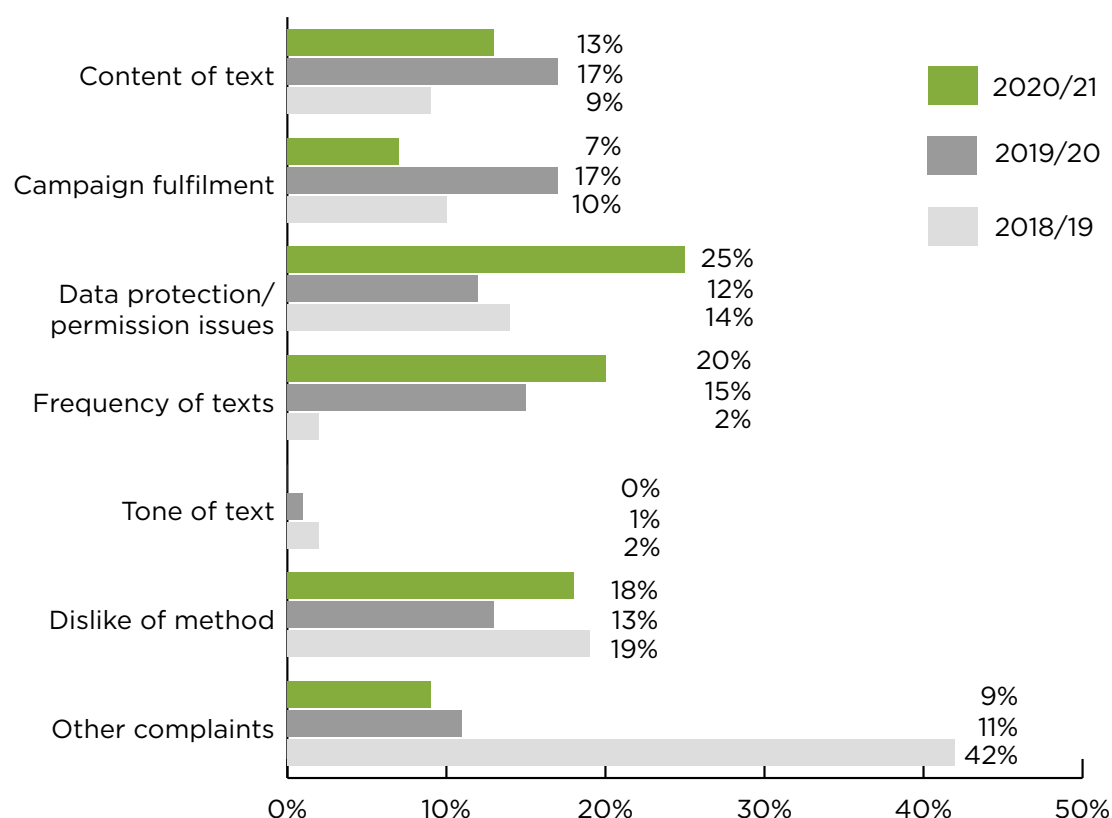
There has been a reduction in the number of charities fundraising via SMS from 35 in 2019/20 to 28 in 2020/21. The figures suggest charities did not take up fundraising via SMS as an alternative to in-person methods during the pandemic. As the number of organisations undertaking SMS fundraising declined, so did the number of organisations who recorded complaints about this method.

Data protection and frequency of texts were cited as the most common reason for these complaints. Complaints about the content of the texts and campaign fulfilment were down on the figures reported last year.

Table: Summary of complaints and activity for the past three years

SMS fundraising	2020/21	2019/20	2018/19
No. of orgs using SMS fundraising	28	35	31
% of orgs using method	50%	55%	53%
Total no. of texts sent	3,437,547	2,561,602	4,188,825
No. of orgs reporting complaints	8	13	16
% of orgs reporting complaints	14%	23%	28%
Total no. of complaints	55	130	185
Complaint to texts sent ratio	1:62,501	1:19,705	1:22,642

Graph: Reason(s) for a complaint for the past three years





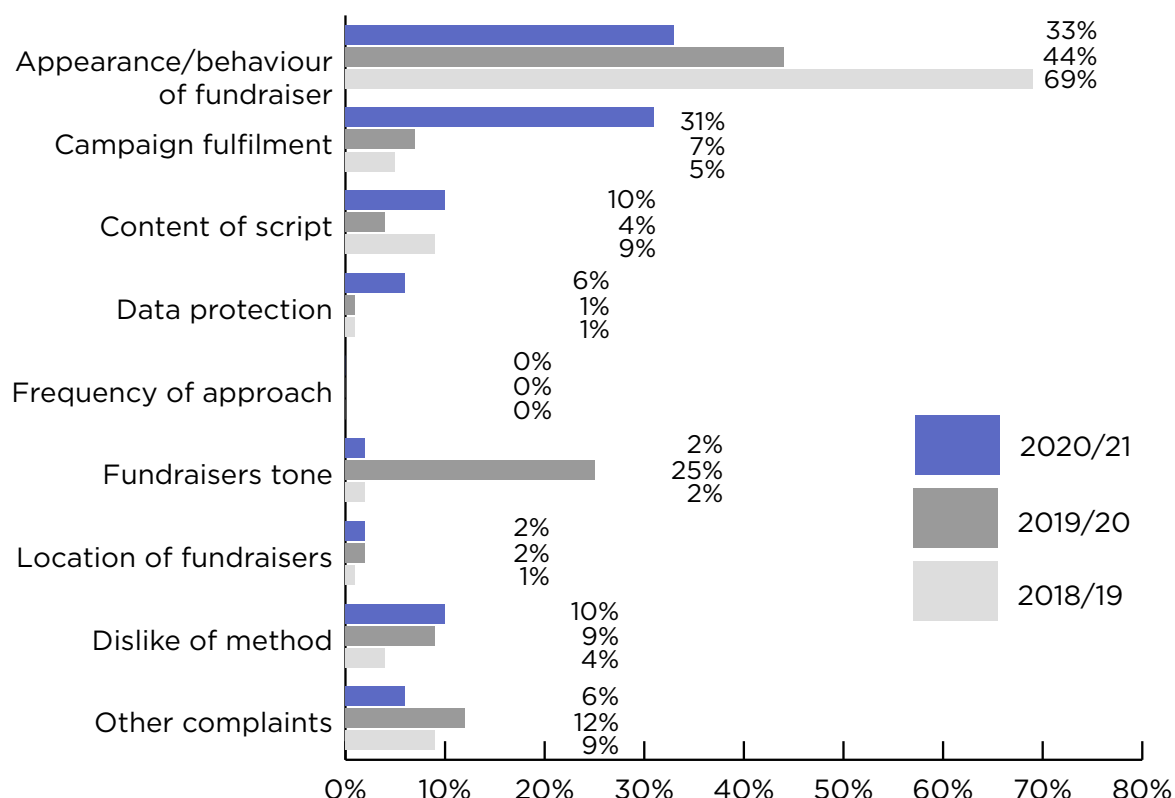
In 2020/21 complaints about street fundraising dropped dramatically. This coincides with activity being paused at times throughout the year due to the pandemic. In this reporting year, there were just six charities fundraising in this way, which is likely due to the restrictions on in-person contact. All charities carrying out this method received complaints about it.

Although there were far fewer complaints than in previous years, the proportion of complaints to activity is similar to the proportion for 2019/20. Street fundraising is one of the top five 'riskiest' methods for complaints. Appearance and behaviour of fundraiser was the most cited reason for a complaint, which follows previous years. Complaints about the fundraiser's tone has dropped considerably year-on-year.

Table: Summary of complaints and activity for the past three years

Street fundraising	2020/21	2019/20	2018/19
No. of orgs using street fundraising	6	12	11
% of orgs using method	11%	21%	19%
Total no. of street sign ups	6,556	45,582	1,855,756
No. of orgs reporting complaints	6	13	11
% of orgs reporting complaints	11%	22%	20%
Total no. of complaints	51	236	349
Complaint to sign ups ratio	1:129	1:193	1:5,317

Graph: Reason(s) for a complaint for the past three years





The large increase in the total number of complaints in the past year, from 108 in 2019/20 to 2,504 in 2020/21, is due to complaints in relation to one charity's corporate partnership. This demonstrates that corporate partnerships can be highly contentious. See page 26 for issues to consider when entering a corporate partnership.

Please note, in previous years, the charities who submitted data did not receive a significant number of complaints for corporate fundraising, so we have not included data for 2018/19 and 2019/20. This fundraising method was previously called 'fundraising from businesses'.

Additional insight into complaints reported by charities

In this section of the report, we have summarised the responses to two open-ended questions. These questions were a new addition to the Annual Complaints Return in 2020/21. The responses give us additional insight into the fundraising complaints received by charities.

Q1: Over the year (April 1 2020 to March 31 2021), did you see any obvious changes in the complaints you received?

Q2: Have there been any specific issues or activities that have resulted in complaints?

The majority of charities noted that they received fewer complaints this year because they paused in-person activities amid COVID-19 restrictions. Where charities received complaints specific to the pandemic, many organisations reported that this was due to cancelling or postponing events. Despite this causing concern for members of the public, event cancellations were unavoidable, and in-line with government guidance issued during the year.

Charities reported that because they focused more on alternatives to in-person fundraising, such as TV and online fundraising, these areas received more complaints. This supports the findings in this report. An increased focus on email and online fundraising did lead to some charities receiving more complaints about website faults, rather than their fundraising activity specifically. For example, web browser errors and automated email acknowledgment.

Some charities reported that they saw greater positive engagement with their active supporters. Some also reported that they saw greater reach on their social media and websites and saw an increase in donations via these channels.

Other methods of fundraising

This year and historically the fundraising methods in this section have received very few complaints. As few complaints were reported, we do not have insight into the reasons for these complaints. Below is the data recorded for these methods of fundraising in 2020/21.

Tables: Summary of complaints and activity for the past three years

Static collections

Static collections	2020/21
No. of orgs using static collections	19
% of orgs using method	34%
Total no. of static collections	323,981
No. of orgs reporting complaints	6
% of orgs reporting complaints	11%
Total no. of complaints	60
Complaint to number of collections ratio	1:5,400

Free draws and prize competitions³²

Free draws and prize competitions	2020/21
No. of orgs using free draws and prize competitions	15
% of orgs using method	27%
Total tickets sold by orgs using method	4,198,132
No. of orgs reporting complaints	5
% of orgs reporting complaints	9%
Total no. of complaints	43
Complaint to tickets sold ratio	1:97,631

Major donor

Major donor fundraising	2020/21
No. of orgs using major donor fundraising	48
% of orgs using method	86%
No. of major donor contacts approached	19,696
No. of orgs reporting complaints	9
% of orgs reporting complaints	16%
Total no. of complaints	16
Complaint to activity ratio	1:1,231

³² In previous years, this was called 'other prize draws'

Tables: Summary of complaints and activity for the past three years

Radio advertising

Radio advertising	2020/21
No. of orgs using radio advertising	26
% of orgs using method	46%
Total audience reach	596,474,562
No. of orgs reporting complaints	3
% of orgs reporting complaints	5%
Total no. of complaints	14
Complaint to audience reach ratio	1: 42,605,326

Trusts and foundations

Trusts and foundations fundraising	2020/21
No. of orgs using trusts and foundations	47
% of orgs using method	84%
No. of applications to trusts and foundations	30,117
No. of orgs reporting complaints	8
% of orgs reporting complaints	14%
Total no. of complaints	10
Complaint to activity ratio	1:3,012

Print media³³

Print media fundraising	2020/21
No. of orgs using print media	30
% of orgs using method	54%
Total audience reach	361,729,185
No. of orgs reporting complaints	4
% of orgs reporting complaints	7%
Total no. of complaints	9
Complaint to audience reach ratio	1:40,192,132

Public outdoor advertising³⁴

Public outdoor advertising	2020/21
No. of orgs using public outdoor fundraising	19
% of orgs using method	34%
Total adverts served by orgs using method	197,813,663
No. of orgs reporting complaints	2
% of orgs reporting complaints	4%
Total no. of complaints	4
Complaint to adverts served ratio	1:49,453,416

³³ In previous years, this data was split across two different categories: 'magazine/newspaper inserts' and 'press advertising'

³⁴ In previous years, this was called 'outdoor advertising'

Conclusion

The findings from this year's report show that amid the pandemic, the charitable fundraising sector maintained its commitment to good fundraising. The continued decline in complaints suggests that organisations are taking a thoughtful and measured approach to fundraising.

The data suggests that organisations have taken account of the public's reduced appetite for face-to-face fundraising. Although in-person fundraising was permitted at times throughout this reporting year, most of the charities contributing to this report chose not to fundraise in this way. Even amid reducing staff teams and remote working, charities have continued to listen and respond to the concerns of the public and their donors.

Throughout this reporting year, there was considerable use of online methods of fundraising, which corresponds with increasing complaints. However, the rise in complaints is not disproportionate to the significant amount of activity. Nonetheless, organisations had to adapt quickly during times of great uncertainty and the increasing complaints in this area is a reminder that fundraising should always be planned carefully, and in a way that meets the standards in the code.

The complaints data continues to show that some methods of fundraising are more disliked than others. We have seen for the third year that charity bags are still the most complained about method of fundraising in complaints made to the Fundraising Regulator. This clearly shows that the charity sector will always need to undertake considerable planning in this area so that this activity maintains the support of the public.

The Fundraising Regulator is preparing to embark on its next five-year strategy from 2022 onwards. As part of that, we are committed to providing an effective casework function that supports the public when they encounter concerns about fundraising and supports the sector to learn from complaints and drive up standards. We will continue to provide learning for the fundraising sector and will engage with organisations to further improve this report. We thank the 56 charities who have submitted their data to this year's Annual Complaints Report for the invaluable insight they share with the wider charitable fundraising sector.

Changes to glossary and reporting categories for Part 2 2020/21

In autumn 2020 we engaged with the charities that complete the Annual Complaints Return for Part 2 of this report to discuss ideas on how it could be improved. They told us that they need considerable advance notice to make substantial changes to their internal processes used to collect complaints data. We have therefore made only small changes to the format of this year's return survey.

The changes include updating the glossary to provide greater clarity on how the different methods of fundraising are defined and combining some methods of fundraising together. Last year there were 26 reporting categories and this year there are 24. For example:

- press advertising, magazine and newspaper inserts now form one category;
- raffles, free draws and prize competitions are one category;
- street collections and private site collections have been removed from cash collections; and,
- prospective face-to-face fundraising has been removed as a category as no data has been recorded against it for the past three years.

This means that some methods of fundraising are not directly comparable with data from previous years.

We are aware that we are not able to capture information on all types of fundraising that a charity might conduct. However, the data included in this report is intended to give a snapshot of complaints received about common fundraising methods.

	2020/21 method	2020/21 definition	2019/20 method	2019/20 definition
1	Fundraising	An ask for money or other property for charitable, benevolent, or philanthropic purposes.	Fundraising activity	Any activity which is specifically designed to raise income for a charity.
2	Addressed mail fundraising	Fundraising communications that are sent through the post and is addressed to a named individual living at the property.	Addressed direct mail	A fundraising appeal sent through the post which has been specifically addressed to an individual residing at the property.
3	Static collections fundraising	The collection of cash from the public using collection boxes that remain in one place.	Cash collection ³⁵	The collecting 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.
4	Charity bags fundraising	The distribution of charity bags to households with the purpose of obtaining clothes and/or other goods for resale and/or recycling.	Clothing collections	A fundraising campaign which entails distributing collections bags to households with the purpose of obtaining clothes and other goods for resale and/or recycling.
5	Door-to-door fundraising	Fundraisers who go door-to-door (also called 'house-to-house') between residential addresses, to known and prospective donors, with the purpose of procuring one-off cash/property or regular Direct Debit donations.	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.
6	Email fundraising	A fundraising communication that is sent to existing and prospective donors via email.	Email fundraising	A fundraising appeal that has been sent to both existing and prospective supporters by email.
7	Corporate fundraising	A fundraising activity that is run in collaboration with a commercial partner and/or participator. This includes, for example, campaigns involving cause-related marketing, sponsorship deals and 'charity of the year' activities.	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.
8	Lotteries and raffles fundraising	Lotteries - a fundraising method which involves the distribution of 'tokens' resulting in the winning token(s) being selected at random in an official draw. This usually involves a monetary prize.	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.
9		Raffles - a lottery in which the prizes are goods rather than money.	Raffles	A lottery in which the prizes are goods rather than money.

³⁵ Cash collections did not replace static collections as a singular category. Instead, the decision was made to separate out the fundraising methods previously housed under the term 'cash collections' (i.e. static collections, door-to-door, private site and street fundraising).

	2020/21 method	2020/21 definition	2019/20 method	2019/20 definition
10	Major donor fundraising	A fundraising activity that involves interaction with either prospective or current major donors.	Major donor fundraising	Any fundraising activity which has involved interaction with either prospective or current high value givers.
11	Online fundraising	A fundraising ask that is hosted on a website and is aimed at an online audience. This can include a charity's own website, advertising banners or pop-ups on third-party websites, as well as social media and online fundraising platforms.	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 contribution and/or advertising an event.
12	Free draws and prize competitions fundraising	Prize competitions – a 'gaming'-based fundraising method that involves an element of skill (for example, a question) for entry.	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.
		Free draws - a 'gaming' based fundraising method that has a free entry route.		
13	Public outdoor advertising fundraising	A fundraising ask that is displayed in prominent outdoor locations, either on private or public land. Examples include advertisements on billboards, bus stops and public transport.	Outdoor advertising	A fundraising appeal which has been displayed in prominent outdoor locations such as billboards, bus stops and advertisements on public transport.
14	Challenge and sponsorship events fundraising	Fundraising events that raise money through sponsorship of a person or group of people who intend to complete a specific task or challenge, for example, run a marathon, climb a mountain, or cycle or walk a certain distance.	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, fêtes, fairs or treasure hunts.
15	Print media fundraising	A fundraising ask that is included in printed media, such as magazines or newspapers. This includes magazine and newspaper inserts.	Magazine/newspaper inserts	A fundraising campaign involving hard copies of flyers or leaflets being enclosed in the pages of newspapers and magazines.
16			Press advertising	A fundraising appeal which has been included in printed media, such as magazines or newspapers.
17	Private site fundraising	Fundraisers who approach members of the public on private property (for example, supermarkets or shopping centres) with the purpose of procuring one-off cash/property or regular Direct Debit donations.	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.

	2020/21 method	2020/21 definition	2019/20 method	2019/20 definition
18	Radio advertising fundraising	A fundraising ask that is broadcast on a local, national or digital radio station.	Radio advertising	A fundraising appeal that has been broadcast on a local, national or digital radio station.
19	SMS fundraising	A fundraising ask that is sent to a donor or potential donor through a mobile text message service with the purpose of procuring one-off cash/property or regular Direct Debit donations.	SMS fundraising	A fundraising appeal which has been sent to the public through mobile text message.
20	Social events fundraising	A fundraising activity that has a specific 'social' focus, such as an event and possibly with ticketed entry. This could include, for example, a coffee morning or a pub quiz.	Social activities	Fundraising activities that have a specific 'social' focus.
21	Street fundraising	Fundraisers who approach members of the public on the street with the purpose of procuring one-off cash/property or regular Direct Debit donations.	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.
22	Telephone fundraising	A fundraising ask that is made to a donor or potential donor through a telephone service with the purpose of procuring one-off cash/property or regular Direct Debit donations.	Telephone fundraising	A fundraising appeal which uses the telephone to approach both prospective and existing supporters.
23	Television advertising fundraising	A fundraising ask that is broadcast on television through 'paid for' advertising. This includes campaigns for regular donations, one-off donations and the advertising of fundraising events.	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.
24	Trust and foundation fundraising	A charitable institution applying to trusts and foundations to solicit funds in the form of grants.	Trusts and foundations	Set up by companies and/or individuals for the purpose of using profit or private wealth for charitable purposes.
25	Unaddressed mail fundraising	A fundraising communication that is sent through the post that is not addressed to a named individual living at the property but instead, for example, to 'the Occupier' of a property.	Unaddressed direct mail	A fundraising appeal sent through the post with a direct ask and has not been addressed to a specific individual but instead 'the occupier' of a property. These appeals may also be known as 'door drops'.
26	Volunteer fundraising	Fundraising activity that is carried out by an individual acting as an on-behalf-of volunteer fundraiser and who are under instruction by the charity to raise funds on its behalf and in its name.	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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