

# Annual Complaints Report 2023/2024

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# INTRODUCTION

# About us

The Fundraising Regulator is the independent regulator of charitable fundraising in England, Wales, and Northern Ireland. We also regulate fundraising in Scotland where it is carried out by charitable institutions where the lead regulator is the Charity Commission for England and Wales (CCEW) or Charity Commission for Northern Ireland (CCNI). Fundraising by those only registered in Scotland is regulated by the Office of the Scottish Charity Regulator (OSCR) and Scottish Fundraising Adjudication Panel.

We consider complaints about charitable fundraising where these cannot be resolved by organisations themselves. We also investigate proactively where fundraising has caused, or has the potential to cause, harm.

Visit our <u>website</u> for more about us and the scope of our regulation.



# **EXECUTIVE SUMMARY**

In this report, we present insights from the Fundraising Regulator's casework (see part one, pages 10-27) alongside complaints reported by a sample of the UK's largest fundraising charities (see part two, pages 28-72) for the period 1 April 2023 to 31 March 2024.

This data is analysed in the context of a continued cost of living crisis, as well as in comparison to reporting from previous years.

# Part one

In part one of this report, we focus on three key themes: misleading information, door-to-door fundraising and issues seen about fundraising by community interest companies (CICs). These are areas we wish to highlight where we think there is relevant learning for the sector and where we can see new fundraising issues emerging.

# Part two

In part two of this report, we look at complaints relating to various fundraising methods that have been received by a sample of the largest fundraising charities. We compare this year to previous reporting years and highlight the relationship between the prevalence of a method and the number of complaints about that method. You can find the definitions of the different fundraising methods we discuss in part two in the glossary annex at the end of this report on page 76.

# FOREWORD

## By Jenny Williams, Chair, Complaints and Investigations Committee

Throughout 2023/24, the sector has continued to face a challenging environment from the impacts of the cost of living crisis leading to a strain on resources. However, the emergence of technologies such as artificial intelligence (AI) has also provided new opportunities for innovation within the sector, as well as posing some additional challenges. We will continue to work closely with the sector to help identify and address these challenges.

This report sets out the learning and data from the Fundraising Regulator's caseload during this period, as well as fundraising complaints data reported to us by over 50 of the UK's largest fundraising charities. We wish to thank these charities, as always, for their continued support in sharing their complaints data with the sector to help inform best practice.

The findings of this year's report mirror sentiments we have seen from the public, in the press and in our work over the past year, namely that door-to-door fundraising remains unpopular with the public and continues to receive high levels of complaints.

This supports the findings we have seen through our own <u>research into the public's</u> <u>perception of different fundraising</u> <u>methods</u>, our <u>first market inquiry report</u> <u>into subcontracting in face-to-face</u> <u>fundraising</u>, and several high-profile reports in the press.

This year's report also discusses a new theme - fundraising conducted by community interest companies (CICs). This year we have received a significant number of complaints relating to the fundraising behaviour of CICs that threaten to bring charitable fundraising into disrepute. Lastly, we want to highlight some upcoming changes to how we will be reporting complaints data from charities, as this is the last time we will publish a report in this format. In response to a survey of over 450 charities conducted in 2023, we've decided to pause the collection and publication of data from charities for two years. This data usually forms part two of our Annual Complaints Report and we're pausing it so we can work with the sector to make improvements to how we collect this data and share the results in more useful and accessible ways.

During this two-year period, we will continue to report on the complaints the Fundraising Regulator receives from members of the public (the Annual Complaints Report part one) and analyse charities' compliance with the fundraising reporting requirements of the Charities Act 2016. You can <u>read more on our website</u> about our decision to pause the publication of this data and the improvements we intend to make.



# **CONTEXT FOR FUNDRAISING IN 2023/24**

In this report, where possible, we compare data from 2019/20 to 2023/24 to demonstrate changes to fundraising activity and complaints levels in a post-pandemic world. This is in the context of a continued cost of living crisis, the growth of artificial intelligence, and several issues impacting the reputation of charitable fundraising.

Sep - 2022	Continuing Disasters Emergency Committee (DEC) Ukraine appeal (launched in early 2022), which has so far raised £438m.
1 Sep - 2022	DEC launches Pakistan Floods Appeal.
23 Sep 2022	'Mini budget' delivered against cost of living backdrop.
31 Oct - 2022	Some provisions of the Charities Act 2022 come into force.
30 Nov - 2022	ChatGPT launches.
6 Feb - 2023	DEC launches Turkey-Syria Earthquake Appeal.
2 Aug 2023	Wales Online publishes investigation into subcontracted door-to-door fundraising agencies.
12 Oct - 2023	Fundraising Regulator launches market inquiry into subcontracting in face-to-face fundraising.
9 Nov - 2023	Annual Complaints Report 2022/23 published showing complaints about door-to-door fundraising have significantly risen.
26 Mar - 2024	Fundraising Regulator publishes market inquiry.
30 May - 2024	Fundraising Regulator publishes research on the public's experience and expectations of charitable fundraising.

# Continued impact of the cost of living crisis

The cost of living crisis has continued to have an impact on those who fundraise. Consumer Prices Index (CPI) inflation rose by a further 2.0% in the 12 months to June 2024<sup>1</sup>. This was after CPI had already increased by 8.9% in the 12 months to March 2023<sup>2</sup> in the aftermath of the pandemic and after Russia's invasion of Ukraine further worsened global prices<sup>3</sup>. Research from multiple sources indicates charities' resources remain strained as they continue to face higher costs and increased demand on services, with less income.

The Charities Aid Foundation (CAF) estimated a record £13.9 billion was donated to charity in 2023, an increase on the £12.7 billion donated in the previous year. However, it also found fewer people had donated to charity compared to before the pandemic, even though some donors are giving larger amounts to certain causes and appeals. With the exception of "super givers" making very large donations, the typical charity donation of £20 had not increased since 2017. With inflation peaking at 7.1% in 2023, this real-terms cut has strained many charities' finances. Last year, £800 million less also went to overseas aid and disaster relief. This is roughly half the support in 2022, where the public generously donated to appeals to support Ukraine, for example.

# Guidance for the cost of living

Charity Commission for England and Wales Improving your charity's finances

1 Consumer price inflation, UK; Office for National Statistics; <u>https://www.ons.gov.uk/economy/</u> inflationandpriceindices

- 2 Consumer price inflation, UK: March 2023; Office for National Statistics; https://www.ons.gov.uk/economy
- 3 Exchange of letters between the Governor and the Chancellor regarding CPI Inflation March 2023; Bank of England; <u>https://www.bankofengland.co.uk</u>

# **Growth of Al**

Over the past year, the rapid growth and potential of generative and predictive AI tools to transform how charities operate and fundraise – along with the new opportunities and risks they bring – have been key topics of discussion within the sector. Some charities appear to embrace the use of AI, while others are more hesitant. Thirty-five percent of charities are already using AI for certain tasks, while a further 26% have plans to do so in the future<sup>4</sup>. Charities appear very interested in AI's potential but are not yet ready to respond to its sudden emergence in our working lives, with 78% agreeing that AI is relevant to their charity, but 73% feeling unprepared to respond to the opportunities and challenges that come with it<sup>5</sup>.

Increasing numbers of charities are using AI within fundraising to assist with tasks such as writing draft funding bids, creating fundraising or marketing materials, and analysing donor data, as just a few examples. However, those who use AI in their fundraising need to be aware of its limitations and risks, including accuracy of information, data privacy and the potential for bias as part of the range of ethical and legal considerations AI presents.

# **Guidance for using AI**

Charity Commission for England and Wales: <u>Charities and artificial intelligence</u>

4 Charity Digital Skills Report 2023; <u>https://charitydigitalskills.co.uk/wp-content/uploads/2023/07/</u> Charity-Digital-Skills-Report-2023.pdf

5 Charity Digital Skills Report 2023; https://charitydigitalskills.co.uk/wp-content/uploads/2023/07/ Charity-Digital-Skills-Report-2023.pdf

# **Reputation of charitable fundraising**

During the last year charities have continued to return to face-to-face fundraising after the lifting of coronavirus pandemic restrictions. However, with this there has also been a notable increase in practices that threaten to bring the sector into disrepute.

We became aware of several serious concerns about poor fundraising practice involving face-to-face fundraising carried out by sub-contracted marketing companies, who sometimes further sub-contracted the fundraising activity. These were identified from complaints, high-profile stories in the media and self-reports made to us by charities.

This led to us launching our first market inquiry into the use of subcontracting in face-to-face fundraising. After running a series of workshops with charities and fundraising agencies, we published our first market inquiry report detailing our findings and recommendations to charities on 26 March 2024. Recommendations included that subcontracting firms are monitored more closely by charities and that agency staff should receive appropriate training.

Although we recognise the value face-to-face fundraising has for the sector, <u>research we commissioned from Opinium</u><sup>6</sup> shows that the method remains unpopular with the public. Sixty-two percent of respondents rated their experience of door-to-door fundraising negatively, and 40% rated their experience of public fundraising negatively. This highlights the continuing need for charities to conduct face-to-face fundraising in a sensitive and considerate way.

However, we were encouraged to find that overall charities perform well when it comes to public trust, with half of those surveyed generally trusting charities to deliver on what they promise. We were also pleased to find that the experience of those who currently support a charity is good, with around two-thirds of respondents having had a positive experience of supporting charities over the last 12 months. Forty-two percent of respondents also said that knowing the Fundraising Regulator existed would make them more likely to trust charity fundraisers, which demonstrates the value of registering with the regulator and displaying the Fundraising Badge.

6 The public's experience and expectations of charitable fundraising; Opinium and the Fundraising Regulator; <u>https://www.fundraisingregulator.org.uk/more-from-us/news/opinium-research-publics-</u> <u>experience-and-expectations-charitable-fundraising</u>

# PART ONE

# Complaints received by the Fundraising Regulator

1 April 2023 – 31 March 2024

# **KEY FINDINGS**

The purpose of part one is to share learning from our casework that is relevant to the wider fundraising sector. We focus on the complaints that are both about charitable fundraising and within the scope of our regulation. To understand how we define this, see the methodology (page 74).

- Misleading fundraising and misleading information continue to be the most complained about theme in the complaints that we receive and is a common cause for complaints across different types of fundraising. It has been the single most complained about theme for the past three years in a row (with 15% of complaints in 2023/24, 12% of complaints in 2022/23 and 18% of complaints in 2021/22). As in previous years, these complaints highlight the need for clear, considered wording in materials and scripts.
- Door-to-door fundraising has continued to be one of the more complained about fundraising methods to the regulator. Although this method is a good way for charities to interact with the public and generate income, it is also unpopular, with many complainants expressing a dislike for the method. Agency use of subcontractors and subsubcontractors can make it more challenging for charities to retain appropriate oversight and control of compliance with the relevant standards.
- We have seen new issues arise from fundraising by CICs, who have less regulation than registered charities. This year we have seen a growing number of complaints about fundraising by CICs (54 out of 455 overall complaints). These have come from members of the public, charity fundraisers, local authorities, and the police. The concerns have mainly related to negative fundraiser behaviour, pressure to donate, licences and permissions, and misleading fundraising.



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# **Overview of our casework data**

### Incoming and closed casework

In 2023/24, we received 1,060 incoming cases overall – a 6% decrease on 2022/23 (1,128 cases). We closed 1,036 cases in this reporting period (of which 42 were received in 2022/23 and one in 2021/22). Of the closed cases, we identified 455 complaints that were both about charitable fundraising and within the scope of our regulatory remit. Most of the remaining cases were outside the scope of our regulation, raising concerns on topics including personal cause fundraising, potential fraud, and charity governance – for more information, see the methodology (page 74).

## Self-reported fundraising incidents

In March 2022, we launched a new self-reporting pathway for the sector. This enables fundraising organisations to tell us proactively about incidents of potential code breach that they have identified internally, or been made aware of through, for example, a complaint or press enquiry. It is not mandatory for charities to do this, but it can be a good way to let us know what has happened before a complaint reaches us, and to tell us what the organisation is doing to put it right. Self-reports also help us and the sector to identify emerging risks and ways to mitigate them, and is an indicator of support for the code, therefore also benefitting not just the charity self-reporting but also the wider sector. We can also provide advice and guidance to the self-reporting organisation if it's needed.

Since the new pathway launched, we have had 47 self-reports submitted to us (26 in 2023/24, an increase of 37% from the 19 organisations that submitted self-reports to us in 2022/23, and two received in 2021/22). This year we opened investigations into two self-reports, which related to separate media articles regarding door-to-door fundraising. For most self-reports, the organisations had taken appropriate action to resolve their issues before contacting us. For others, we were able to offer advice and have constructive conversations with the organisations. The themes of some of these self-reports included handling personal data, fundraising governance, potential fraud, and donors in vulnerable circumstances.

We received four self-reports about hacking/ransomware cyber security incidents, three of which were from hospices and small hospitals. It was interesting to see these self-reports made at a time when there has been a suggestion that these types of incidents within the sector may be on the rise. Some organisations seemed better prepared than others to respond, with some self-identifying signs of a potential threat and locking down their systems to minimise impact, although others only became aware when systems were already compromised.

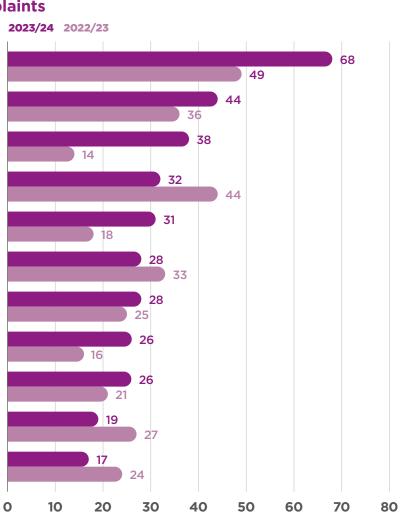
Charities wishing to prevent cybercrime within their own organisations can read the Charity Commission's guidance '<u>Protect your</u> <u>charity from fraud and cyber crime</u>'.

## **Methods and themes**

Reviewing complaints thematically, most related to misleading information (68), fundraiser behaviour (negative) (44), licence and permission (38), repeated contact (32), and pressure to donate (31).



Misleading information Fundraiser behaviour (negative) Licence and permission Repeated contact Pressure to donate Dislike of method (fundraising) Customer service (fundraising) Vulnerable circumstances Charity governance (fundraising) No charity bag sign Restricted donation



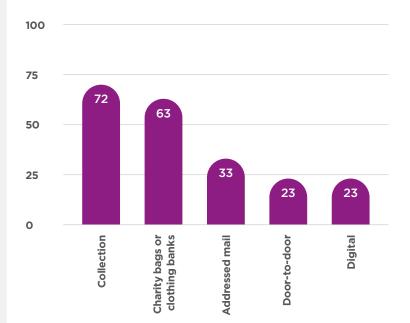
In 2023/24, the methods that generated the most concern were collections (public – cash) (72), charity bags/clothing banks (63), addressed mail (33), face-to-face fundraising (regular gift – doorto-door) (23) and digital (donation page) (23).

Cash collections from the public involve one-off donations as opposed to regular donations. We have found this high number of complaints (72) related directly to the increase in complaints we have seen about CICs carrying out street fundraising.

In 2023/24, charity bags once again became one of the most complained about fundraising methods reported to the regulator. This contrasts with the number of complaints about this method received by the sample charities in part two of the report, and our public research which showed individuals were likely to have a positive experience with charity bags. Although complaints about this method have been historically high, over the past few years we have been working with organisations using this method to reduce the number of complaints. Where individuals have complained about the unwanted delivery of bags, charities have arranged for the address to be supressed and for the delivery of bags to stop.

However, in a number of cases we found that after approximately 18 months to two years, delivery of bags to these individuals resumed. We have seen this to be a familiar pattern. and one which individuals reported as frustrating. When we contacted the charities concerned, we found that staff in the charity and/or the bag delivery company had changed and therefore the understanding and knowledge about how to prevent these problems had been lost. We've encouraged charities to keep records of how to deal with these issues, so it can be included in handovers to new staff.

## Method of fundraising (where known)

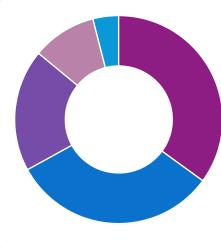


# Top five most complained about methods 2023/24 vs 2022/23

	2023/24	2022/23
1.	Collection	Door-to-door fundraising
2.	Charity bags or clothing banks	Charity bags or clothing banks
3.	Addressed mail	Addressed mail
4.	Face-to-face (including door-to-door)	Digital
5.	Digital	Collection

Digital fundraising is where we see most complaints about misleading information. Although it is convenient to have the option to click to donate readily available, such as on a charity's website or social media, charities should ensure they give donors enough information before or during the donation process to ensure they are fully informed about what exactly the donation is for. Donors may not read all material and will click through to donate, only to discover later that they did not fully understand what they were donating for.

Where individuals mention 'dislike of method' as a reason for complaining about a fundraising method, charity bags and face-to-face fundraising are methods that feature highly. However, <u>public research we</u> <u>conducted this year</u> conversely showed that the public reported a more positive experience receiving charity bags as opposed to door-to-door or street fundraising, which was perceived much more negatively.

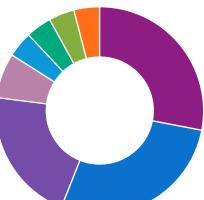


# Complaints about digital fundraising methods

Donation page	23
Online fundraising platform	21
Social media	13
Other	7
Email	3

## Complaints about dislike of fundraising method

Charity bags / clothing banks	8
Collection or regular gift	8
Face-to-face	6
Digital	2
Addressed mail	1
Lottery	1
Telephone fundraising	1
Unaddressed mail	1



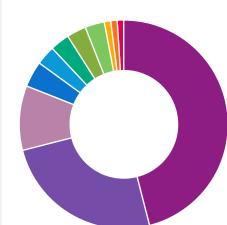
# THEME ONE: MISLEADING INFORMATION

Year-on-year, misleading information is consistently the theme where we see the highest number of complaints in our casework across different types of fundraising methods. This can include a charity providing misleading information about what the charity is, its cause, and what it will use any donations for, as examples.

Most complaints about misleading information we received relate to fundraising for a restricted purpose (see more about restricted funds in our glossary annex on page 76). We also have had several complaints where there is confusion about the identity of an organisation and the claims it makes about what it is raising funds for.

These cases highlight the importance of well-considered wording and good record-keeping to ensure fundraising is open and honest, and donors know where their money is going.

Complaints about misleading information have been the single most complained about theme for the past three years in a row (15% or 68 out of 455 in 2023/24, compared to 12% or 49 out of 399 in 2022/23; and 18% or 70 out of 381 in 2021/22).



## Misleading information by method

Digital	30
Collection	15
Advertisements	6
Other	5
Events	3
Charity bags / clothing banks	2
Lottery	2
Addressed mail	2
Charity shops	1
Face-to-face	1
Grants and trusts	1

The Code of Fundraising Practice (the code) gives examples of what misleading information looks like in practice, including leaving out information, being inaccurate or ambiguous, or exaggerating details.

Receiving a complaint does not mean that charities have acted deliberately to mislead donors, and in most cases these complaints are not upheld. However, in a minority of cases we have found that charities have unintentionally or inadvertently misled donors. This most often occurs when there is a lack of clarity in the fundraising materials about whether donations are intended for a restricted purpose or general funds.

# Why it is important an appeal does not mislead potential donors

Donors often seek clarity and reassurance about a charity or organisation, its cause, and the purpose it is raising funds for before giving. They will often read an organisation's information, such as on their website and fundraising materials before giving. Donors also rely on this information being accurate if they wish to distinguish a charity from other organisations that are raising money for similar causes.

Charities need to be clear in the information they provide about their services, as potential donors may know of similar services provided by other local organisations. It is important that charities and organisations can distinguish the services they provide. Although lack of clarity and insufficient detail is not necessarily misleading information, the volume of complaints we are receiving show potential donors have concerns.

# Organisations should take care not to accidentally make a restricted fund

Fundraising organisations should take care not to inadvertently create a restricted fundraising appeal through the information they present. This could occur when the language or presentation of information in fundraising materials leads donors to believe that their donations will only be used for a specific purpose. This becomes an issue if the charity then spends the funds more widely on general purposes which can lead to complaints about the ways funds are used. Similarly, organisations should be careful in making statements saying that a proportion of funds raised will then be used for a specific purpose where this cannot be monitored or substantiated.

# Learning from our casework

#### The complaint

We received ten complaints about a charity in a short space of time (11 months) about potentially misleading information on their website. This included claiming to be raising money for the NHS without any formal agreement in place with them and using NHS branding on their website. We also received complaints that the charity had not responded to or investigated complaints made directly to it.

# What happened

The charity's website initially claimed donations were to be used for specific regional hospitals, and to be raising money for "your local hospital" on their fundraising materials and website, therefore creating what seemed to be a restricted appeal. However, the charity and fundraisers were not keeping records of which donations were made for which specific named hospital and was intending to use the funds more generally. There were also no agreements in place with any hospitals to accept the donations or regarding what they would be used for. There was no evidence to confirm donations had been made to any hospitals, and the charity's main expense had been fundraising costs.

## **Our decision**

We could not find any evidence that the charity had set aside funds for any specific hospital, nor recorded which donations were for which hospital. It appeared instead that all donations were pooled, and the charity made decisions about how to direct them. The charity changed its approach in 2021 from stating that donations would benefit particular hospitals to stating that donations would go to hospitals "in your region" and "vour regional hospital where the need is greatest". However, we found these statements to be misleading. The charity's materials did not explain to donors what was considered 'their' region and there was no means for online donors to specify their region. The charity drew up a list of nine or ten hospitals in each region and donated a single fixed amount to each one. We did not see any evidence of how the charity decided which hospitals had the greatest need, or if it did so at all, and we did not see any evidence that the hospitals received the donations.

We saw evidence that the charity used fundraising materials that suggested a direct working relationship between itself and the NHS and its charity partner, NHS Charities Together. These organisations made it clear to us that this was not the case.

# Learning from our casework (continued)

### Recommendations

We asked that the charity:

- Update its website and fundraising materials to ensure it is not misleading donors by:
  - providing a clear explanation of how its regional model of donations works; and
  - ensuring its fundraising materials do not suggest it is fundraising for critical care within the NHS.
- Show us how it will manage its restricted funds, both for in-person donations and online donations.
- Have a Memoranda of Understanding with any NHS hospitals or trusts it wishes to pass donations on to.
- Explain to us how it intends to develop an improved system of complaint handling which comprehensively records complaints and implements learning.
- Consider whether to refund two donations that were intended for specific hospitals but were not passed on, and notify us of the trustees' decision and reasoning.

## Outcome

We found that the charity had breached the code standards about ensuring funds raised for a particular purpose were used specifically for that purpose, making misleading statements, and allowing donors to make an informed decision. The charity did not acknowledge these, nor demonstrate what actions it will take to comply with the code. We reported its non-compliance to the Charity Commission for England and Wales, which assisted them in investigating wider governance concerns. The findings of our investigation and code breaches were also published on our website to alert potential donors and reassure NHS England that its logo was not being misused. The charity has closed since we published our investigation.

# Responding to complaints about misleading information

## Be open to feedback

Be as open and responsive as possible to feedback about your fundraising information and materials and listen to those involved in the same area you are fundraising for. It is likely they will have experience that your organisation can benefit from and it may also help to avoid similar complaints from others in the future.

#### Be transparent

In response to complaints, be as transparent as possible. Keep detailed records of how you have used donations so you can show how you have used any funds received.

# Mitigating complaints about misleading information

#### **Avoid generalised statements**

General statements such as "all funds raised will go towards..." or "90% of funds raised will be used for..." should be avoided in fundraising materials if you know that donations may be used for more general purposes. It may be seen as misleading if some of the funds said to be for a specific purpose are then used for general costs, such as administrative costs, salaries, or operating expenses.

# Have the right agreements in place from the start

If you state in your materials that you are fundraising to support another organisation, before you start fundraising you should ensure that you already have the correct agreements in place. These agreements should outline how the funds will be used and transferred to that organisation.

#### Be clear about who you are

Be as clear as possible in all your fundraising materials about who you are, what your purpose is, what services you offer, and what distinguishes you from other organisations with similar goals. This can help donors avoid any confusion and can help avoid any claims from donors that you misled them about who you are and your objectives.

#### **Further guidance**

<u>Chartered Institute of Fundraising (CloF): Restricted and unrestricted funding</u> <u>Charity Commission for England and Wales: Charity fundraising appeals for specific</u> <u>purposes</u> <u>Fundraising Regulator: Guidance for charitable institutions working with professional</u> fundraisers

# THEME TWO: DOOR-TO-DOOR FUNDRAISING

As we saw last year, door-to-door fundraising continues to be one of the most complained about methods the regulator sees in its casework. This aligns with data reported by the sector and explained in part two of this report.

Our cases have shown the importance of charities having sufficient oversight of their fundraisers, including details of the contracts, training, monitoring, and complaint handling throughout its supply chain, rather than relying mainly on its contractual requirements with fundraising agencies. These cases also highlight the importance of sufficient risk assessment of this fundraising method in light of changes to public habits and mood, and ensuring that systems designed to protect the vulnerable do not fail.

## Door-to-door continues to be a disliked method

In our <u>recent research published by Opinium on the</u> <u>'The publics' experience and expectations of</u> <u>charitable fundraising'</u><sup>7</sup>, we saw that door-to-door and public fundraising – methods that the public has less agency over – received the most negative feedback. The research found that 62% of respondents rated their door-to-door experience negatively against 17% who had a positive experience, echoing the high volume of complaints we receive about this method.

Importantly, the research found that negative experiences can have an impact on the public's likelihood to engage with door-to-door fundraising again in the future, as well as with charities in general. Therefore, it is critical that charities and fundraisers think carefully about how they approach using these methods.

<sup>7</sup> The public's experience and expectations of charitable fundraising; Opinium and the Fundraising Regulator; https://www.fundraisingregulator.org.uk/ more-from-us/news/opinium-research-publics-experience-andexpectations-charitable-fundraising

# Learning from our casework

#### The complaint

The complainant's spouse was signed up on their doorstep to make a regular gift to a charity by an agency fundraiser. The complainant explained that their spouse was vulnerable and did not have capacity to provide the authorisation needed to sign up to the donations. The complainant was not satisfied with the response received from the charity and asked us to investigate the matter.

## What happened

The complainant found donations were being taken from them and their spouse's joint account when checking bank statements, so they contacted the charity to enquire about them. The complainant explained their spouse's circumstances to the charity, and that they had a 'no cold calling' sign in place. Once it was found the charity had signed up the complainant's spouse to make a regular gift by Direct Debit, the charity cancelled this and refunded the complainant for the donations already taken.

The charity discovered that a system error had resulted in the complainant's spouse not being sent an advance notification letter after they were signed up to donate to tell them that the donations would begin coming out of their bank account. This is why the complainant did not discover the donations were being taken sooner. Because of the circumstances of the complainant's spouse, the complainant believed that the fundraiser had likely entered their property to assist the spouse in getting their financial details. As the complainant was dissatisfied with this response, the charity referred them to the police and the Fundraising Regulator.

## **Our decision**

Charities have a responsibility to ensure third-party fundraisers keep to the code and understand their responsibilities when representing them in fundraising campaigns. This includes how fundraisers approach people in potentially vulnerable circumstances.

On examination of the policies and procedures the charity has in place, as well as the training and monitoring of the agency itself, we were satisfied that overall, these were sound. However, given the plausible and persuasive nature of the testimony in relation to the complainant's spouse, we were also satisfied that given the level of training we know they would have received, the fundraiser should have been aware of the spouse's vulnerability and should not have signed them up to donate.

We could not fairly say on the information available the specific actions this fundraiser took during this interaction – only that we were content on balance that the code was breached in terms of the assessment of a potentially vulnerable donor. There was also not enough information for us to say whether or not a 'no cold calling' sign was in place at the time. We were satisfied with how the charity handled the complaint and the steps taken to rectify the issue.

Although we did not find any systemic issues with the charity or its agency, we found the agency was responsible for the breach of the code by its individual fundraiser's actions, and the charity was also responsible for the breach, on the basis that it was ultimately responsible for its agents.

# Learning from our casework (continued)

### **Our recommendations**

We recommended that the charity:

- Review its existing regular giving process to minimise errors that could prevent advanced notification letters from being sent.
- Checks the training its third-party fundraisers receive to ensure that there is no contradictory local guidance undermining its policies or fundraising practice, with particular reference to potential donors who may be in vulnerable circumstances.
- Review its handling of this matter, so that it recognises and embeds the positive approach we found was demonstrated by its managers, while also learning from any errors and identifying gaps in knowledge about complaint handling.

We also recommended that the fundraising agency that the charity worked with review any local guidance that brings into question the delivery, understanding, and practice of its vulnerability training for fundraisers across all its charity contracts.

# Responding to complaints about doorto-door fundraising

# Effectively investigate any complaints about fundraisers you work with

Charities should not tolerate any poor behaviour by fundraisers identified by complaints. Charities often assume that poor fundraising behaviour is isolated to the one individual fundraiser and either arrange for re-training or dismissal of that individual.

However, complaints about poor behaviour may be indicative of wider issues and inappropriate sales techniques and incentives encouraged by the company who has engaged the fundraiser. Charities need to be alert to this possibility when looking at complaints data and consider undertaking further root cause analysis of complaints. Charities should also give additional attention or priority to complaints that relate to potential breaches of the code.

# Review door-to-door practices to ensure they meet the charity's values

Charities should carefully think about what they consider to be 'reasonable persuasion' and what is allowed by their door-to-door fundraisers and ensure that their fundraisers understand their expectations. This should ensure charities protect the public from unreasonably persistent approaches from fundraisers or undue pressure to donate. Charities should ensure that any local guidance provided to fundraisers does not undermine their own values, particularly in relation to the treatment of donors who may be in vulnerable circumstances. For example, fundraisers may be encouraged to use prompts about where potential donors can find their bank details to enable them to sign up for a regular donation. However, this would be inappropriate where a donor is in vulnerable circumstances.

# Mitigating complaints about door-todoor fundraising

# Ensure the training of fundraisers is sufficient

Fundraisers should be sufficiently trained so that they can identify someone who might be in vulnerable circumstances and know how to act around them. This does not mean a fundraiser cannot fundraise in these situations, but how the fundraising can be conducted in certain circumstances should be considered. It is also worthwhile having oversight of the scripts used by fundraisers and agencies, as these may have been adapted to include marketing techniques that may be in breach of the code.

Fundraisers should also be trained to recognise 'no cold calling' or similar signs that make it clear the householder does not want to receive a visit. Charities should ask fundraisers they work with not to call at doors where there are any signs indicating that person does not want to be disturbed. Fundraisers also need to be aware that when a potential donor says 'no' to a fundraising request they must comply with the code. Reasonable persuasion is allowed, but if someone is clear they are not interested the fundraiser should leave.

# Make sure you are effectively monitoring fundraising conducted by agencies or sub-contractors

Charities need a clear line of sight of all the activity of their agencies and any sub-contractors to ensure the fundraising done on their behalf is compliant with the code. Fundraising agencies and companies they sub-contract to do not have the same statutory responsibilities that a charity does for its fundraising. They are often marketing companies, whose motivations may be different to the charity's.

Therefore, fundraising agencies should be bound contractually to observe the code and monitored to ensure that any fundraising they do fully reflects the charity's own fundraising policies and support for the code. Charities therefore need to know about the organisational culture of any sub-contracted agency to ensure any fundraising it does on the charity's behalf reflects the charity's own values.

# Have safeguards to provide opportunities to identify people who signed up for a regular gift but don't want to proceed

This is particularly important for identifying people in vulnerable circumstances when asking them to sign up for a regular donation. These are often checks carried out by the fundraising agency rather than the charity, but it is important these are regularly reviewed to ensure they are adequate and working properly.

# **Further guidance**

<u>Chartered Institute of Fundraising: Treating donors fairly</u> Key behaviours expected of fundraisers: guidance for fundraisers

# THEME THREE: FUNDRAISING BY COMMUNITY INTEREST COMPANIES (CICS)

We have seen a growing number of complaints submitted to us about fundraising by CICs in the past year. CICs are businesses which are set up with a purpose that benefits the community, but they are not registered charities and not subject to the same rules and regulations that registered charities are. At the start of 2024, we published our second investigation into a CIC after we had received 21 more complaints about them in the six months following our initial investigation. We have continued to receive a high level of complaints about this CIC, which have accounted for a significant proportion of our total complaints relating to negative fundraiser behaviour, pressure to donate, licences and permissions, and misleading information.

We have seen an increase in complaints about other CICs carrying out street fundraising without the appropriate permissions. In addition, we have started to receive complaints from charities themselves about CICs' behaviour when street fundraising and also private site fundraising. Charities need to apply for licences to fundraise, and they may be restricted in the number of times they can carry out street fundraising. For example, in London charities are only allowed to fundraise four times a year.

# Why is the Fundraising Regulator involved in CIC fundraising cases when they are not charities?

The Fundraising Regulator's remit extends to all types of charitable fundraising. Therefore, the code equally applies to fundraising being carried out by CICs. CICs are private businesses that are set up to provide a community benefit and will come within our remit if they fundraise for charitable purposes.

We have also seen that the public finds it difficult to distinguish between fundraising carried out by charities and CICs, with members of the public often mistakenly assuming that CICs are the same as charities. Therefore, when a CIC engages in poor fundraising behaviour, it can negatively impact on the reputation of the charity sector. It is therefore essential that our work tackles fundraising by CICs to help protect the reputation of charitable fundraising and charities who fundraise in a legal, open, honest and respectful way.

# Our experience of engaging with CICs

In our experience engaging with CICs about complaints, we have found that in general they were not aware that fundraising was regulated, nor were they aware of the work of the Fundraising Regulator and the code.

The CICs that have come to our attention have a reliance on donations from in-person fundraising rather than income from business activity, and some appear to have wholly charitable objects. It is important that CICs are aware that they are subject to the same regulation as other forms of charitable fundraising and should abide by the rules in the code.

Part of this is being aware that they needed a licence to fundraise in different areas. Licences can be obtained from local authorities, who have differing requirements and processes. There also appears to be a lack of structure and organisation in terms of the governance of CICs and sometimes operationally, which has been surprising given their level of income. When we engage with them, they also often don't have information or policies that we would expect to see from fundraising charities. This could include policies about behaviour when they fundraise from the public, which should align with the code.

In response to these issues, we are broadening awareness of the code so that CICs develop a better understanding of their responsibilities when fundraising.

# Learning from our casework

We received a significant number of complaints within a six-month period about one CIC. The complaints showed recurring themes, such as the poor conduct of street fundraisers, including obstructing people's paths or shopfronts to talk, following people, approaching people sat down, soliciting donations, using pressurised fundraising techniques, and using excessive persistence when told 'no'. Fundraisers also failed to display an ID badge and would operate as a group - such as seven in one location - to exert more pressure on members of the public. The language used by the CIC's representatives was also misleading, as they clearly indicated that they were fundraising for a cause, which could mislead the public into thinking they were registered charity fundraisers.

Charity fundraisers also found that CICs were carrying out street fundraising without a licence in areas where the charity had permission to fundraise. Sometimes CIC fundraisers refused to move from a site that had been booked by a charity, and in one case we received a report of the site's security guards having to move the CIC fundraisers on. We have also received reports of CIC fundraisers being aggressive to registered charities fundraising in the same area, when only the charities have permission to fundraise.

The fundraising concerns about CICs have been generally about one-off donations (either cash or card), but there has also been a report of one CIC seeking regular donations.

# PART TWO

Complaints reported by a sample of the UK's largest fundraising charities

> 1 April 2023 -31 March 2024

# INTRODUCTION

The purpose of this part of the report is to share information about complaints reported by a sample of the UK's largest fundraising charities. This helps organisations across the wider fundraising sector to understand the common reasons why complaints are received and to benchmark their own complaints data. To understand more about the data we collect, refer to the methodology (page 74).



# **Key findings**

The top five methods with the highest number of reported complaints this year are:

- Email (due to an outlier case please see more detail below)
- Door-to-door
- Addressed mail
- Challenge and sponsorship events
- Private site

Looking purely at complaint numbers, this year charities have reported that fundraising via email was the most complained about method for the first time. However, email fundraising complaint numbers this year were significantly skewed by a General Data Protection Regulation (GDPR) issue with an email fundraising campaign by one charity. The charity in question has since updated their GDPR policies and resolved this issue, and there have been no reports of significant issues with email campaigns within this charity since June 2023.

If we excluded the complaints about email submitted by this one charity, overall complaints about email fundraising are in fact the lowest they have been for five years, and it would only be the fourth most complained about method. Excluding this case, door-to-door is the most complained about method, as it was last year. It has consistently featured in the top five most complained about methods for the past four years. This aligns with <u>our research published this</u> <u>year</u> which showed door-to-door approaches are perceived more negatively than other methods of fundraising by members of the public. To address the anomaly and provide a more representative picture, we have excluded that charity's email fundraising complaint data when discussing individual fundraising methods in detail (see page 44). For example, with this email issue included in our overall complaints data, email fundraising makes up 26% of all fundraising complaints reported this year. However, when the anomalous data is excluded, email fundraising only accounts for 6% of overall reported complaints.

# A note on Israel/Gaza conflict fundraising complaints

Several charities informed us that they had received complaints regarding fundraising related to the Israel/Gaza conflict. Complaints spanned several different methods of fundraising, although most fell under the activity of 'marketing'. For one charity, 70% of the email fundraising complaints were about the content of their Israel/Gaza appeal.

# **Complaints by method**

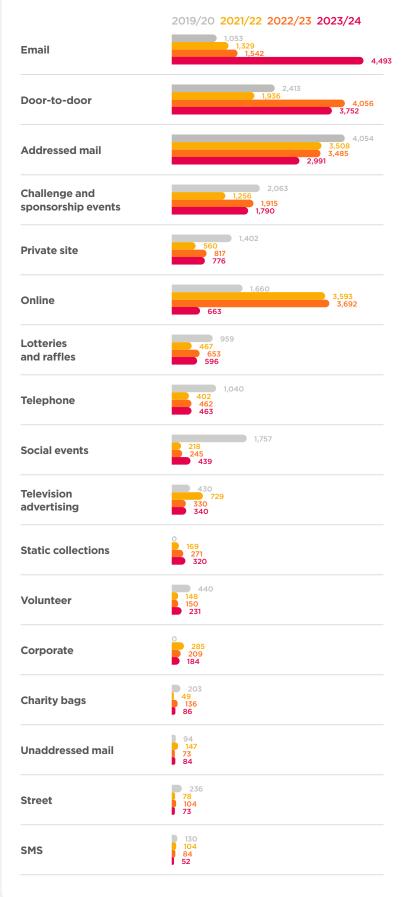
This graph shows the number of complaints reported for the most complained about fundraising methods. In our graphs 2020/21 has been excluded as this was an unusual year because of the coronavirus pandemic, so comparisons against this year are less relevant. Refer to the appendices for the full data table (see page 79).

Grouping fundraising methods together by activity type enables us to identify common trends. In the charts below we compare the percentage change in complaint numbers between this reporting year (2023/24) and the previous reporting year (2022/23) as well as between this year and the last pre-coronavirus reporting year (2019/20) for collections, events, gaming, and marketing activity.

Due to changes in the fundraising method name and definition used in 2020/21, data for static collections and corporate fundraising is not directly comparable with 2019/20.

Note: All stats in these charts are based on absolute complaint numbers, so numerical changes may be skewed by changes in activity levels and the number of organisations providing data.

# Total reported complaints by method



# Collections

100%

80%

60%

40%

20%

0%

-20%

-40%

-60%

-80%

-100%

Most forms of collections saw a drop in complaints between 2022/23 and 2023/24. The exception is static collections (collections using collecting boxes which stay in one place), which saw an 18% increase in complaints. Since the last year of pre-coronavirus reporting (2019/20), complaints about door-to-door fundraising have increased significantly, but complaints about other collection methods have fallen (see analysis of individual methods on page 37 for more details).

# Collections % change 2022/23 to 2023/24

18%

-30%

Street

-5%

**Private site** 

-7%

Door-to-door



# Collections % change 2019/20 to 2022/23

Static collections not included as no comparable data for 2019/20.

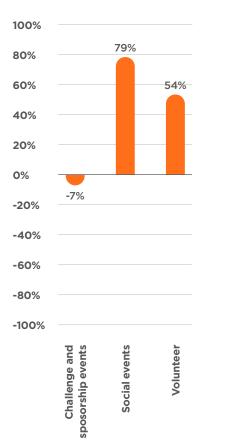
Static collections

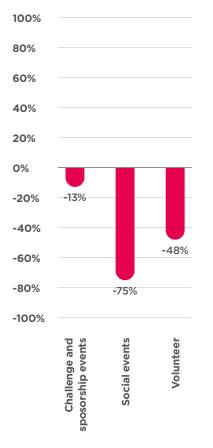
#### **Events**

Complaints about social events rose significantly, increasing by 79% from 2022/23 to 2023/24. Complaints about volunteer events also saw a significant increase of 54%. Only challenge and sponsorship events saw a reduction in complaints in 2023/24. However, complaints about all types of event fundraising have fallen since the last year of pre-coronavirus reporting (2019/20). Please see page 42 for further details.





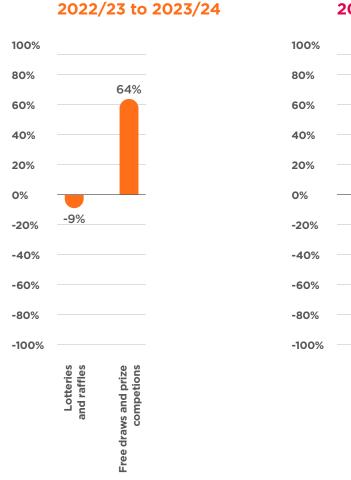




# Gaming

Complaints about free draws and prize competitions increased significantly (by 64%) from 2022/23 to 2023/24. Free draws and prize competitions were not included in pre-coronavirus reporting, as free draws in particular have grown in prominence since the end of the pandemic. The level of complaints about lotteries and raffles has fallen slightly since 2022/23 and significantly since 2019/20.

**Gaming % change** 



#### Gaming % change 2019/20 to 2022/23

-38%

Lotteries and raffles

Free draws and prize competitions not included as no comparative data from 2019/20.

# Marketing activity (direct and non-direct)

The significant increase in the level of complaints about email fundraising (191%) in 2023/24 is largely due to the GDPR data issue referred to above for one specific charity. If the data from this charity is removed, complaints about email fundraising have in fact fallen by 43% from 2022/23 to 2023/24. Complaints about online fundraising fell significantly (by 82%) between 2022/23 and 2023/24. However, complaints about radio advertising increased by 29% and complaints about unaddressed mail increased by 15% in the same period.

With the exception of email fundraising, complaints about all types of marketing activity have fallen compared to 2019/20.

# Marketing activity 2022/23 to 2023/24

191%

-14%

Addressed mail

-82%

Online

3%

**Television** advertising

Email

0%

Telephone

350%

300%

250%

200%

150%

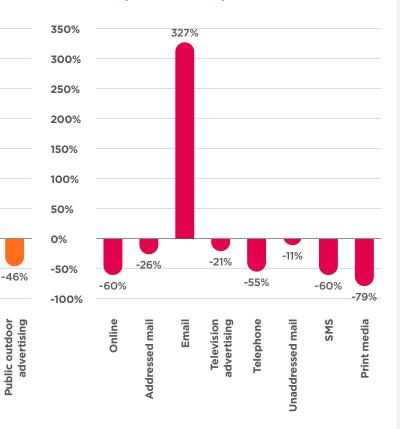
100%

50%

0%

-50%

-100%



# Marketing activity 2019/20 to 2022/23

There is no available comparative data for radio advertising and public outdoor advertising from 2019/20.

Radio advertising

29%

0%

**Print media** 

15%

Unaddressed mail

-38%

SMS

# **Ratio of complaints to activity**

As well as comparing the overall number of complaints, the report also looks at the ratio of complaints to activity levels. Comparing complaints to activity levels across fundraising methods gives an indication of which methods have a higher risk of generating complaints.

Volunteer fundraising was the method most likely to generate complaints in 2023/24 and was more likely to generate complaints than in 2022/23. In 2023/24, the ratio was around one complaint for every 200 volunteer events, compared to around one complaint for every 250 events in 2022/23. Corporate fundraising was the second most likely method to generate complaints in 2023/24. However, the ratio of one complaint for every 225 corporate fundraising asks in 2023/24 was a significant improvement on the 2022/23 ratio of one complaint for every 92 corporate fundraising asks.

Although it has the third highest ratio in the table above, street fundraising was half as likely to generate complaints in 2023/24 (one for every 439 sign-ups) compared to 2022/23 (one for every 215 sign-ups).

Both social events and static collection saw a large increase in the proportion of complaints to activity between 2022/23 and 2023/24.

Method	2023/24	2022/23
Volunteer	1:199	1:248
Corporate	1:225	1:92
Street	1:439	1:215
Social events	1:553	1:856
Static collection	1:680	1:880

# Top five methods most likely to generate a complaint

# COMPLAINTS BY FUNDRAISING METHOD AND REASON

In this section, we share more information about the reasons given to charities for the complaints they received about each fundraising method. Reporting this data is optional and percentages may not add up to 100%. See the methodology for more information (see page 74).

### **Door-to-door fundraising**

Over the past four years, door-to-door fundraising has consistently been in the top five most complained about methods of fundraising and was the most complained about method in 2022/23. If the email fundraising complaints to a single charity which experienced a GDPR data issue are excluded, door-to-door fundraising is the most complained about method again in 2023/24, making up 27% of all complaints received by the sample charities. If the email fundraising complaints to that charity are included, door-to-door fundraising is the second most complained about method in 2023/24 and makes up 22% of all reported complaints.

The number of complaints about door-to-door fundraising fell by 8% from 4,056 in 2022/23 (the highest level seen in recent years) to 3,752 in 2023/24. In the same period, door-to-door activity levels increased by more than 10%, so the ratio of complaints to activity for door-to-door fundraising also fell in 2023/24. The ratio of one complaint per 6,548 visits in 2023/24 was around 20% higher than one complaint per 5,441 visits in 2022/23. The 2023/24 ratio is still below the 2019/20 ratio of one complaint per 7,465 visits, meaning door-to-door fundraising is still more likely to generate complaints than before the pandemic.

Similar to previous years, around half of all respondents carried out door-to-door fundraising in 2023/24 (49%). Every organisation that carried out door-to-door fundraising in 2023/24 received complaints, which indicates it is a method that is likely to generate complaints. Although significant numbers of people do not like the method, it does work for charities in terms of generating income, which is why they continue to use this approach.

In line with previous reporting, 'behaviour of fundraiser' was the most frequently reported reason for complaints, increasing from 29% in 2022/23 to 35% in 2023/24. 'Dislike of method' also remains a common reason for complaints, increasing from 20% to 25% in 2023/24.

In their narrative submissions, charities explained that complaints about door-to-door fundraising included concerns that vulnerable members of the public were being targeted, the legitimacy of the door-to-door fundraisers, and the time of day that fundraisers were knocking on doors. The charities also explained that they are updating their training and policies for fundraisers and the third-party agencies they work with in response to the complaints.

Door-to-door	2023/24	2022/23	2021/22	2020/21	2019/20
No. and % of sample using method	26 (49%)	30 (53%)	25 (45%)	14 (25%)	25 (45%)
No. and % of sample using method who reported complaints	26 (100%)	29 (97%)	24 (96%)	17 (121%) <sup>8</sup>	25 (100%)
No. of households visited	24,569,108	22,070,440	18,826,602	3,579,338	18,013,114
No. of complaints	3,752	4,056	1,936	752	2,413
Ratio of complaints to visits	1:6,548	1:5,441	1:9,724	1:4,760	1:7,465

<sup>8</sup> The 2020/21 data shows that 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.

# Common reasons for complaints about door-to-door (%)

Behaviour of fundraiser	2019/20 2021/22 2022/23 2023/24
	29 35
Dislike of method	19 20 25
Inappropriate time to knock	8 14 11 11
Other complaints	8 7 6
Ignored 'no cold callers' sticker	2 5 6 5
Content of script	4 5 3 4
Frequency of visits	2 3 3 4
Campaign fulfilment	2 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3
Inappropriate time to access multiple occupancy residences	1 1 1 2
Appearance of fundraiser	
Data protection	
Fundraiser's tone	2 2 5 1
Ignored 'no cold calling control zone'	2 1 1

#### **Addressed mail**

Complaints about addressed mail fundraising represented 22% of all complaints received by the sample charities in 2023/24. Complaints about addressed mail fell by 14% from 3,485 in 2022/23 to 2,991 in 2023/24. Addressed mail activity increased by around 5% in 2023/24. As a result, the ratio of complaints to addressed mail sent improved from one complaint per 18,353 pieces of addressed mail in 2022/23 to one complaint per 22,391 in 2023/24. Addressed mail activity is still below pre-coronavirus levels, but complaints and the ratio of complaints to activity have improved steadily since 2019/20.

Addressed mail fundraising remains a common method for the sample of charities, with almost all respondents using it in 2023/24 (98%). Of those, a significant proportion (92%) received complaints, which is broadly in line with previous years. For the fifth consecutive year, the most cited reason for complaints about addressed mail was 'frequency of communication'. However, this fell from 42% of all given reasons in 2022/23 to 25% in 2023/24. 'Campaign fulfilment' also remains a commonly cited reason for complaints (13%), along with 'data protection or permission issues' (13%). Several charities also received complaints from supporters who were asked by addressed mail to increase the amount they donate.

In response to complaints, charities explained they have updated their GDPR policies and procedures, and are continuing to review the use of legitimate interest to contact donors.

No. and % of sample using method   52 (98%)   56 (98%)   56 (100%)   56 (100%)   56 (100%)     No. and % of sample using method who reported complaints   48 (92%)   51 (91%)   55 (98%)   53 (95%)   54 (96%)     No. of pieces of addressed mail sent   66,971,040   63,960,382   66,661,819   63,200,944   70,834,507     No. of complaints   2,991   3,485   3,508   3,687   4,054						
using method 48 (92%) 51 (91%) 55 (98%) 53 (95%) 54 (96%)   using method who reported complaints 48 (92%) 51 (91%) 55 (98%) 53 (95%) 54 (96%)   No. of pieces of addressed mail sent 66,971,040 63,960,382 66,661,819 63,200,944 70,834,507   No. of complaints 2,991 3,485 3,508 3,687 4,054   Ratio of complaints 1:22,391 1:18,353 1:19,003 1:17,142 1:17,473	Addressed mail	2023/24	2022/23	2021/22	2020/21	2019/20
using method who reported complaints   No. of pieces of addressed mail sent 66,971,040 63,960,382 66,661,819 63,200,944 70,834,507   No. of complaints 2,991 3,485 3,508 3,687 4,054   Ratio of complaints 1:22,391 1:18,353 1:19,003 1:17,142 1:17,473	•	52 (98%)	56 (98%)	56 (100%)	56 (100%)	56 (100%)
addressed mail sent   No. of complaints 2,991 3,485 3,508 3,687 4,054   Ratio of complaints 1:22,391 1:18,353 1:19,003 1:17,142 1:17,473	using method who	48 (92%)	51 (91%)	55 (98%)	53 (95%)	54 (96%)
Ratio of complaints   1:22,391   1:18,353   1:19,003   1:17,142   1:17,473	•	66,971,040	63,960,382	66,661,819	63,200,944	70,834,507
•	No. of complaints	2,991	3,485	3,508	3,687	4,054
	•	1:22,391	1:18,353	1:19,003	1:17,142	1:17,473

# Common reasons for complaints about addressed mail (%)

Frequency of communication	2019/20 2021/22 2022/23 2023/24 26 40 42 25
Campaign fulfilment	20 10 13
Data protection or permission issues	9 9 9 13
Campaign content	6 8 8 10
Communication to deceased individual	2 2 4 4
Poorly addressed communication	3 3 2 2
Accompanying enclosures	8 2 1
Tone of appeal	3 1 1 1
Dislike of method	15 13 16 0
Other complaints	8 14 0

#### Challenge and sponsorship events

Complaints about challenge and sponsorship events represented 13% of all complaints received by the sample charities in 2023/24. Complaints fell slightly (by 7%) from 1,915 in 2022/23 to 1,790 in 2023/24. However, the frequency of challenge and sponsorship events fell by 16% in 2023/24. As a result, the ratio of complaints increased from one per 2,118 participants in 2022/23 to one per 1,914 in 2023/24. This means challenge and sponsorship events were more likely to generate complaints in 2023/24 than in any of the past five years.

Challenge and sponsorship events remain a common fundraising method, with 92% of the sample charities using this method in 2023/24. In line with recent years, around half of the sample charities received complaints about this activity (53%). In 2023/24, two charities were responsible for a substantial proportion of the complaints (87% or 1,558 complaints) due to issues with specific events.

The most commonly given reason for complaints by far was 'campaign fulfilment', which increased from 37% of all cited reasons in 2022/23 to 52% in 2023/24. The sample charities explained that complaints involved issues with materials not arriving on time, poor communication before and after the events (sometimes from third parties the charities worked with), and the overall execution and delivery of events. In response, some charities have taken steps to improve communication for supporter journeys and to plan for better oversight when working with external agencies. One charity has also improved the accessibility and visibility of the safety information provided before and during an event.

Challenge and sponsorship events	2023/24	2022/23	2021/22	2020/21	2019/20
No. and % of sample using method	49 (92%)	53 (93%)	51 (91%)	43 (77%)	42 (75%)
No. and % of sample using method who reported complaints	26 (53%)	28 (53%)	29 (57%)	23 (53%)	31 (74%)
No. of event participants	3,425,766	4,056,101	4,776,169	4,730,571	6,110,249
No. of complaints	1,790	1,915	1,256	681	2,063
Ratio of complaints to event participants	1:1,914	1:2,118	1:3,803	1:6,947	1:2,962

# Common reasons for complaints about challenge and sponsorship events (%)

Campaign fulfilment	2019/20 2021/22 2022/23 2023/24 12 24 37 52
Overall execution and delivery	64 9 12
Dislike of method	2 2 8 10
Concerns activity is inappropriate	1 4 3 9
Facilities provided	7 7 7 7
Other complaints	2 20 28 3
Behaviour or conduct	1 2 2

#### **Email fundraising**

Complaints about email fundraising represented 26% of all complaints received by the sample charities in 2023/24 and the number of complaints rose by 191%, from 1,542 in 2022/23 to 4,493 in 2023/24. The ratio of complaints to activity in 2023/24 of around one complaint per 85,000 emails sent is the worst in recent years.

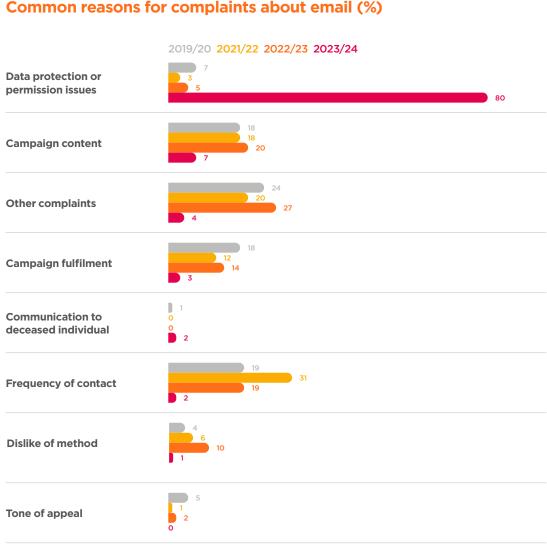
However, these changes are almost entirely the result of a single charity receiving a large volume of complaints about a GDPR issue with one particular email fundraising campaign. Complaints to this charity accounted for 80% of all email complaints in 2023/24, but they were responsible for only around 3% of the total volume of emails sent. The charity responded to the issue by updating their data policies to resolve the issue and has not experienced any further significant issues since June 2023.

If the complaints and activity data for the charity which experienced the GDPR issue are removed, email fundraising complaints represent only 6% of all complaints received by the sample charities. The ratio of complaints becomes around one per 420,000 emails sent, a significant improvement on previous years. The total number of complaints about email fundraising received by the other 52 charities in the sample in 2023/24 was 881, a significant reduction from the 1,542 complaints reported by 57 charities in 2022/23. This is despite an increase in activity of almost 20% between 2022/23 and 2023/24. As with previous years, every charity in the sample used email fundraising, and a significant proportion (83%) reported at least one complaint.

If the data from the charity with the GDPR issue is included, 'data protection or permission issues' is by far the most given reason for complaints, representing 80% of the total. However, if the data from that charity is removed, the reported reasons for complaints are more evenly spread and 'campaign content' is the most common. In 2023/24, 'campaign content' was cited in 33% of complaints, a significant increase from 20% in 2022/23. For one charity, 70% of the email fundraising complaints were about the content of their Israel/Gaza appeal (see note on Israel/Gaza on page 30)

Email	2023/24	2022/23	2021/22	2020/21	2019/20
No. and % of sample using method	53 (100%)	57 (100%)	56 (100%)	56 (100%)	56 (100%)
No. and % of sample reporting complaints	44 (83%)	45 (79%)	46 (82%)	46 (82%)	47 (84%)
No. of emails sent	381,124,307	310,849,623	304,147,109	271,330,526	112,812,622
No. of complaints	4,493	1,542	1,329	1,534	1,053
Ratio of complaints to emails sent	1:84,826	1:201,589	1:228,854	1:176,878	1:107,134

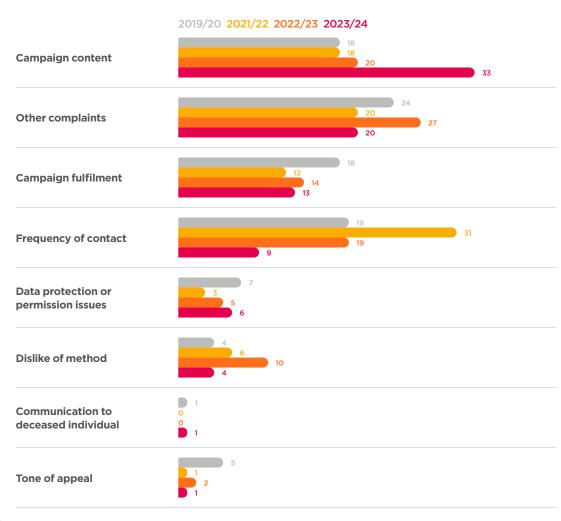
Email	2023/24 excluding single charity emailing issue
No. and % of sample using method	52 (100%)
No. and % of sample reporting complaints	43 (83%)
No. of emails sent	370,689,329
No. of complaints	881
Ratio of complaints to emails sent	1:420,760



#### Common reasons for complaints about email (%)

#### Common reasons for complaints about email (%)

(excluding charity with data breach issue)



#### Private site fundraising

Complaints about private site fundraising represented 6% of all complaints received by the sample charities in 2023/24. The number of complaints decreased by 5% from 817 in 2022/23 to 776 in 2023/24 and activity decreased by a similar amount (6%). As a result, the ratio of complaints to activity remained relatively stable, falling slightly from one complaint for every 713 private site sign-ups in 2022/23 to one complaint for every 701 in 2023/24. Although sign-ups fell slightly in 2023/24, private site fundraising activity remains close to pre-coronavirus levels but is significantly less likely to generate complaints than in 2019/20. Private site fundraising remains common for charities in the sample, with 72% using this method in 2023/24, compared to 65% in 2022/23. Private site fundraising is about as likely to generate complaints in 2023/24 as in previous years, as 87% of charities using this method reported at least one complaint.

Similar to previous years, the most cited reason for complaints about this method was 'behaviour of fundraiser' (53%). Specific issues included complainants feeling pressured, misunderstandings about signing up for regular giving, and concerns about potential fraud or inappropriate sign-up activity. In response, charities have investigated claims against specific fundraisers and are ensuring appropriate training refreshers and quality checks are conducted.

Private site	2023/24	2022/23	2021/22	2020/21	2019/20
No. and % of sample using method	38 (72%)	37 (65%)	31 (55%)	21 (38%)	34 (61%)
No. and % of sample using method who reported complaints	33 (87%)	34 (92%)	26 (84%)	19 (90%)	32 (94%)
No. of sign-ups	546,449	582,415	372,195	51,723	586,397
No. of complaints	776	817	560	115	1,402
Ratio of complaints to sign-ups	1:704	1:713	1:665	1:450	1:418

# Common reasons for complaints about private site (%)

Behaviour of fundraiser	2019/20 2021/22 2022/23 2023/24 46 39 42 53
Other complaints	7 5 8 10
Dislike of method	9 5 7
Campaign fulfilment	8 8 5 5
Location of fundraiser	4 2 3 5
Content of script	7 9 8 4
Fundraisers' tone	5 4 6 2
Data protection	1 2 1 1 1
Frequency of approach	2 0 1 1
Appearance of fundraiser	1 5 0

#### **Online fundraising**

Complaints about online fundraising represented 5% of all complaints received by the sample charities in 2023/24. After three years of consistently high complaint levels, the number of complaints about online fundraising fell substantially in 2023/24 (by over 80%) to the lowest level in recent years.

The significant reduction in complaints can be explained in part by changes in the way that charities now report their online complaints. Many charities in the sample no longer record complaints or criticism connected to general online activity (such as in response to social media posts) as online fundraising complaints.

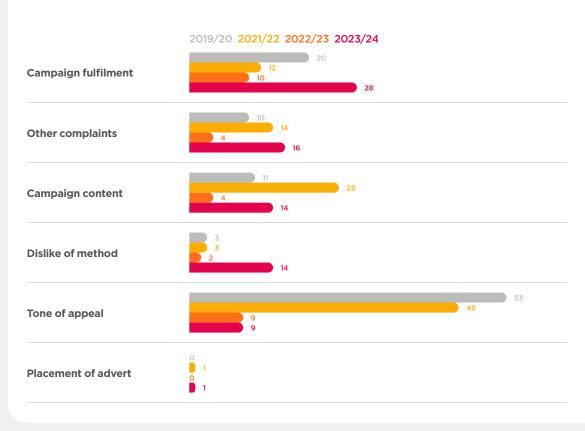
In 2023/24, there were 663 complaints about online fundraising, compared to 3,692 in 2022/23. Activity fell by around 12% in 2023/24, but with the significant reduction in complaints, the ratio of complaints to activity improved substantially. In 2023/24, there was around one complaint for every 14.5 million online fundraising impressions, compared to around one complaint for every 3 million in 2022/23. Online fundraising remains a very common approach for charities in the sample, with 98% using this method. In 2023/24, around half of the sample charities conducting online fundraising (54%) reported at least one complaint. This was the lowest proportion since 2019/20.

The most reported reason for complaints was 'campaign fulfilment', which was cited in 28% of complaints in 2023/24, a significant increase from 10% of given reasons in 2022/23. 'Dislike of method' and 'campaign content' were each cited in 14% of complaints. Complaints about 'dislike of method' saw a significant increase compared to previous years.

Specific issues cited by complainants included difficulty finding information and problems with making donations through charities' websites. Charities have taken steps to address these issues, including improving the error reporting functionality on their websites so they can identify and address problems quicker.

Online	2023/24	2022/23	2021/22	2020/21	2019/20
No. and % of sample using method	52 (98%)	56 (98%)	54 (96%)	53 (95%)	54 (96%)
No. and % of sample using method who reported complaints	28 (54%)	38 (68%)	37 (69%)	40 (75%)	29 (54%)
No. of impressions (approx)	9.6 billion	10.9 billion	8.9 billion	11 billion	5.4 billion
No. of complaints	663	3,692	3,593	5,836	1,660
Ratio of complaints to impressions	1:14,533,015	1:2,958,408	1:2,483,579	1:1,886,192	1:3,284,551

#### **Common reasons for complaints about online (%)**



#### **Lotteries and raffles**

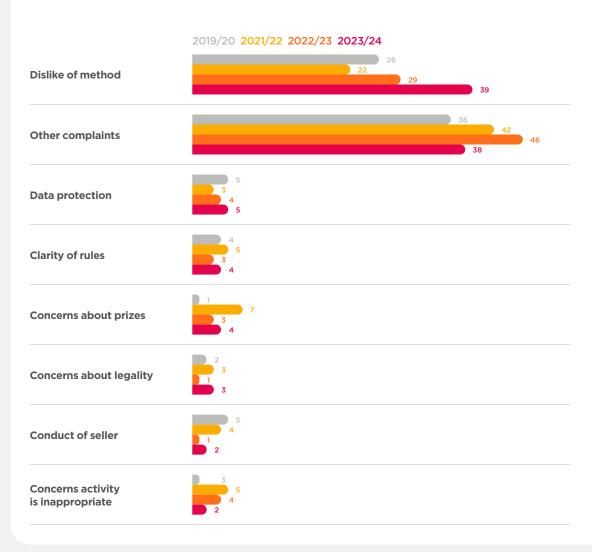
Complaints about lotteries and raffles represented 4% of all complaints received by the sample charities in 2023/24. Complaints fell by 9% from 653 in 2022/23 to 596 in 2023/24. Activity fell by 4% with around 82 million lottery and raffle tickets sold in 2023/24 compared with around 85 million in 2022/23. As a result, the ratio of complaints to activity improved slightly, from around one complaint for every 130,000 tickets sold in 2022/23 to around one complaint for every 137,000 tickets sold in 2023/24.

Lotteries and raffles were a less common method for the sample of charities in 2023/24 than in recent years, with 68% using this method in 2023/34 compared to 77% in 2022/23. Lotteries and raffles activity was just as likely to generate complaints as in previous years, with 81% of sample charities using this method reporting at least one complaint. By far the most commonly given reason for complaints about lotteries and raffles was 'dislike of method', which represented 39% of reasons reported to the sample charities This is a noticeable increase from 2022/23, when 'dislike of method' represented 29% of cited reasons for complaints.

Charities explained that they also received complaints about prize fulfilment. In response to these complaints, the charities have taken steps to prevent human and administrative errors that could lead to such issues.

Lotteries and raffles	2023/24	2022/23	2021/22	2020/21	2019/20
No. and % of sample using method	36 (68%)	44 (77%)	42 (75%)	40 (71%)	33 (59%)
No. and % of sample using method who reported complaints	29 (81%)	34 (77%)	33 (79%)	36 (90%)	33 (100%)
No. of tickets sold	81,528,550	85,137,044	73,636,147	69,320,978	96,438,253
No. of complaints	596	653	467	515	959
Ratio of complaints to tickets sold	1:136,793	1:130,378	1:157,679	1:134,604	1:100,561

#### Common reasons for complaints about lotteries and raffles (%)



#### **Telephone fundraising**

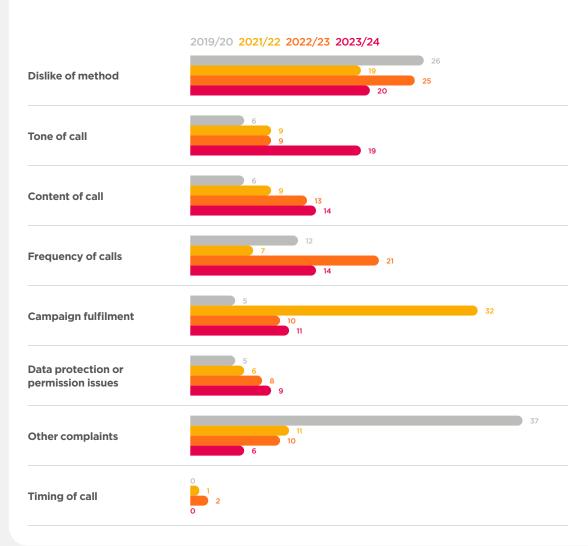
Complaints about telephone fundraising represented 3% of all complaints received by the sample charities in 2023/24. The number of complaints in 2023/24 was almost identical to 2022/23 (463 and 462 respectively) but activity increased by 65% in 2023/24. In 2022/23, charities in the sample made around 2 million fundraising calls, but in 2023/24 they made around 3.5 million calls. As a result, there was a marked improvement in the ratio of complaints to activity in 2023/24 and telephone fundraising calls were significantly less likely to generate complaints than in previous years. In 2022/23, there was one complaint for every 4,536 fundraising calls, compared with one complaint for every 7,466 calls in 2023/24.

Telephone fundraising remains common for charities in the sample, with 87% using this method in 2023/24. Similar to 2022/23, 74% of charities who used telephone fundraising reported at least one complaint in 2023/24. The most commonly given reason for complaints was 'dislike of method', which was mentioned in 20% of all complaints in 2023/24. This was noticeably lower than the 25% of complaints for telephone fundraising which cited 'dislike of method' in 2022/23. The second most common reason was 'tone of call', which was mentioned in 19% of all complaints in 2023/24, a significant increase on previous years when it was consistently cited in less than 10% of all complaints. 'Content of call' and 'frequency of calls' were each cited in 14% of complaints in 2023/24.

Many of the charities reported relatively low complaint levels compared to their volume of calls and so they did not implement significant changes in practice in response to the complaints. Some charities explained that they conduct regular compliance checks with their campaign teams and telephone agencies to identify where script amendments and further training are required.

Telephone	2023/24	2022/23	2021/22	2020/21	2019/20
No. and % of sample using method	46 (87%)	46 (81%)	45 (80%)	46 (82%)	46 (82%)
No. and % of sample using method who reported complaints	34 (74%)	34 (74%)	40 (89%)	38 (83%)	36 (78%)
No. of calls	3,456,892	2,095,545	2,286,844	2,124,924	2,228,766
No. of complaints	463	462	402	509	1,040
Ratio of complaints to calls	1:7,466	1:4,536	1:5,689	1:4,175	1:2,143

#### Common reasons for complaints about telephone (%)



#### **Social events**

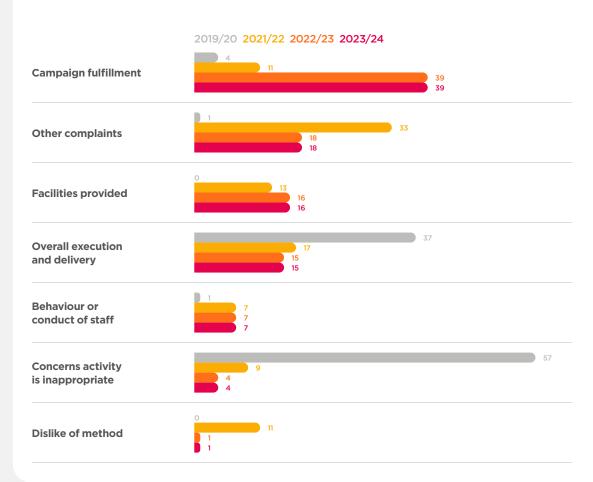
Complaints about social events represented 3% of all complaints received by the sample charities in 2023/24. The number of complaints increased significantly (by 79%) from 245 in 2022/23 to 439 in 2023/24. Activity increased slightly in 2023/24 with 16% more tickets sold than in 2022/23, but the ratio of complaints to activity was significantly worse in 2023/24. In 2022/23, there was one complaint for every 856 social event tickets sold, but in 2023/24 it was one complaint for every 553. Although this represents the worst ratio of complaints to activity in recent years, social events are still half as likely to generate complaints as in the last year of pre-coronavirus reporting (2019/20) when there was one complaint for every 258 event tickets sold.

Social event fundraising remains a fairly popular method for the sample charities, with 57% using this method. Of those charities using this method, 53% reported at least one complaint, which is higher than in recent years. Almost 80% of complaints about social events fundraising were received from one charity because of a specific event. This charity explained they have taken steps to address the feedback from complaints and improve the overall supporter journey from registration through to participation and thanks.

The most commonly given reason for complaints was 'campaign fulfilment' which was cited in 39% of complaints in 2023/24 (the same percentage as in 2022/23). Other issues raised by complainants included the accessibility of social events and poor communication, such as not receiving thank you letters. The charities who received these complaints responded directly to individuals who raised the issues.

Social events	2023/24	2022/23	2021/22	2020/21	2019/20
No. and % of sample using method	30 (57%)	34 (60%)	24 (43%)	21 (38%)	29 (52%)
No. and % of sample using method who reported complaints	16 (53%)	14 (41%)	9 (38%)	12 (57%)	14 (48%)
No. of tickets sold	242,822	209,780	232,661	361,715	453,210
No. of complaints	439	245	218	375	1,757
Ratio of complaints to tickets sold	1:553	1:856	1:1,067	1:965	1:258

#### Common reasons for complaints about social events (%)



#### **Television advertising**

Complaints about television advertising represented 2% of all complaints received by the sample charities in 2023/24. The number of complaints increased slightly from 330 in 2022/23 to 340 in 2023/24. However, as audience reach for television advertising increased by 29% in 2023/24, the ratio of complaints to activity improved significantly. In 2022/23, there was around one complaint for every 24 million views of television fundraising ads, compared with around one complaint for every 33 million views in 2023/24. This means television fundraising ads were significantly less likely to generate complaints in 2023/24 than in recent years.

Television advertising fundraising was more common among the sample charities in 2023/24 than in recent years, with 81% using this method. Seventy-nine percent of charities using this method received at least one complaint in 2023/24 – a similar level to recent years.

One charity received 27% of all complaints about television advertising, with the vast majority of these (85%) citing 'campaign content' as the issue. These complaints largely related to a television advert that showed two men kissing after getting married. Another charity received 19% of all complaints about television advertising, mostly relating to the depiction of illness in the ads. That charity defended the importance of depicting the illness they wish to combat and did not intend to cause distress to viewers. They explained that they regularly review feedback from complaints and ensure broadcast adverts meet the standards of the relevant regulatory bodies, but they do not intend to amend their approach in response to these complaints.

By far the most commonly given reason for complaints was 'campaign content', which was cited in 60% of all complaints in 2023/24. This was an increase from the 51% of complaints which cited 'campaign content' in 2022/23, but still well below the peak of 79% in 2021/22. Reasons complainants objected to campaign content included disapproval that the voice of a high-profile individual was used in two campaigns, and that campaigns were misleading.

2023/24	2022/23	2021/22	2020/21	2019/20
43 (81%)	40 (70%)	41 (73%)	46 (82%)	41 (73%)
34 (79%)	31 (78%)	32 (78%)	36 (78%)	26 (46%)
260 million	200 million	250 million	230 million	140 million
340	330	729	715	430
1:32,813,051	1:24,287,470	1:13,963,238	1:14,604,442	1:13,365,894
	43 (81%) 34 (79%) 260 million 340	43 (81%) 40 (70%) 34 (79%) 31 (78%) 260 million 200 million 340 330	43 (81%) 40 (70%) 41 (73%)   34 (79%) 31 (78%) 32 (78%)   260 million 200 million 250 million   340 330 729	43 (81%) 40 (70%) 41 (73%) 46 (82%)   34 (79%) 31 (78%) 32 (78%) 36 (78%)   260 million 200 million 250 million 230 million

# 2019/20 2021/22 2022/23 2023/24 54 79 **Campaign content** 51 60 Tone of appeal 11 **Dislike of method** 10 Other complaints 13 4 3 4 Campaign fulfilment 2 1 5 4 Timing of broadcast **Choice of channel** 0 2

# Common reasons for complaints about television advertising (%)

#### **Static collections**

Static collections refer to using collecting boxes that stay in one place. Complaints about static collections represented 2% of all complaints received by the sample charities in 2023/24. Complaints about static collections increased by 18% from 271 in 2022/23 to 320 in 2023/24. The level of activity in static collections fell by 9%, from around 240,000 in 2022/23 to around 220,000 in 2023/24. As a result, the ratio of complaints to activity for static collections significantly increased. In 2022/23, there was one complaint for every 880 static collections, but in 2023/24 there was one complaint for every 660. This indicates static collections are significantly more likely to generate complaints than in previous years and the ratio has increased every year since reporting began in 2020/21.

Static collections remain reasonably popular, with 51% of the sample charities using this method in 2023/24. Complaints about static collections come from a small cohort of the sample, five of the 27 charities (19% of the total).

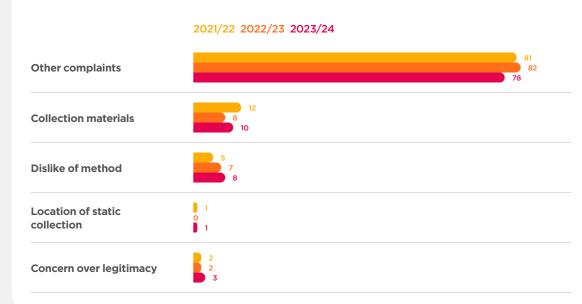
One charity accounted for 69% of static collection activity and received 90% of the complaints. The main issues raised in these complaints were supporters not receiving their collection materials and the conduct of fundraisers. The charity explained that they instructed the appropriate team to review stock distribution and availability.

As with previous years, the most commonly given reason for static collection complaints was 'other complaints' which could indicate the complexity and variety of issues that emerge from static collections. 'Collection materials' was cited as the reason for 10% of complaints, which is similar to previous years.

Static collections	2023/24	2022/23	2021/22	2020/21	2019/20
No. and % of sample using method	27 (51%)	32 (56%)	27 (48%)	19 (34%)	N/A
No. and % of sample using method who reported complaints	5 (19%)	9 (28%)	10 (37%)	6 (32%)	N/A
No. of collections	217,569	238,377	421,128	323,981	N/A
No. of complaints	320	271	169	60	N/A
Ratio of complaints to collections	1:680	1:880	1:2,492	1:5,400	N/A

Due to a historic change in the method name and definition, data comparison is not possible for 2019/20.

#### **Common reasons for complaints about static collections (%)**



#### **Volunteer fundraising**

Complaints about volunteer fundraising represented 2% of all complaints received by the sample charities in 2023/24. Complaints about volunteer fundraising increased significantly (by 54%) from 150 in 2022/23 to 231 in 2023/24. Activity also increased (by 23%) from around 37,000 events in 2022/23 to around 46,000 events in 2023/24. Volunteer fundraising was significantly more likely to generate complaints in 2023/24, with one complaint for every 199 events, compared to one complaint for every 248 events in 2022/23. This is the highest ratio of complaints to activity since pre-coronavirus reporting in 2019/20.

Volunteer fundraising was more common in 2023/24 than in previous years, with 72% of the sample charities using this method. Although complaints increased, these came from a relatively small proportion of the sample (39%).

One charity was responsible for 54% of all complaints about volunteer fundraising despite running a very small proportion of events. Many of the complaints this charity received were about the execution of a single volunteer event run by a corporate partner. The charity explained that this corporate partnership has ended and they have reviewed the feedback to improve future events.

In line with previous years, the most commonly given reason for volunteer fundraising complaints was 'overall delivery or execution', which was cited in 39% of all complaints in 2023/24. This was a significant increase on the 24% of complaints where it was reported in 2022/23. 'Volunteer conduct' was cited in 16% of complaints in 2023/24, similar to the level in 2022/23.

2023/24	2022/23	2021/22	2020/21	2019/20
38 (72%)	34 (60%)	37 (66%)	32 (57%)	37 (66%)
15 (39%)	17 (50%)	20 (54%)	10 (31%)	24 (65%)
45,923	37,260	53,440	67,739	74,104
231	150	148	120	440
1:199	1:248	1:361	1:564	1:168
	38 (72%) 15 (39%) 45,923 231	38 (72%) 34 (60%)   15 (39%) 17 (50%)   45,923 37,260   231 150	38 (72%) 34 (60%) 37 (66%)   15 (39%) 17 (50%) 20 (54%)   45,923 37,260 53,440   231 150 148	38 (72%) 34 (60%) 37 (66%) 32 (57%)   15 (39%) 17 (50%) 20 (54%) 10 (31%)   45,923 37,260 53,440 67,739   231 150 148 120

# Common reasons for complaints about volunteer (%)

	2019/20 2021/22 2022/23 2023/24	
Overall delivery or execution	21 24 39	48
Other complaints	23 28 22 16	
Volunteer conduct	11 6 15 16	
Facilities provided	5 3 10 10	
Concerns activity is inappropriate	3 3 4 3	
Dislike of method	5 5 5 3	
Confirmed legitimacy of event	3 4 1	

#### Corporate

Complaints about corporate fundraising represented around 1% of all complaints received by the sample charities in 2023/24. Corporate fundraising complaints fell by 12% from 209 in 2022/23 to 184 in 2023/24. At the same time, corporate fundraising activity more than doubled, with over 41,000 corporate fundraising asks in 2023/24 compared to around 19,000 in 2022/23. As a result, corporate fundraising was significantly less likely to generate complaints in 2023/24 than in any previous reporting year. In 2023/24 there was one complaint for every 225 corporate fundraising asks, compared with one complaint for every 92 in 2022/23.

In line with recent years, corporate fundraising remained a very common approach for the sample of charities, with 96% using this method in 2023/24. Thirty-three percent of charities conducting corporate fundraising in 2023/24 received at least one complaint, a similar level to previous years. The most commonly given reason for complaints about corporate fundraising was 'inappropriate partnerships', which was cited in 22% of all complaints in 2023/24. This was a significant increase on the 11% of complaints that gave this reason in 2022/23. 'Activity of partnership not considered appropriate' was cited in 15% of complaints in 2023/24, similar to the 18% of complaints that gave this reason in 2022/23.

Several complainants expressed concern about the ethics and environmental impact of certain corporate partners. Some charities also received complaints regarding the quality of merchandise sold by corporate partners and the timeliness of correspondence. One charity explained that: "All our partnerships are reviewed in accordance with our ethical policy before we enter into a relationship with them."

Corporate	2023/24	2022/23	2021/22	2020/21	2019/20
No. and % of sample using method	51 (96%)	53 (93%)	53 (95%)	47 (84%)	N/A
No. and % of sample using method who reported complaints	17 (33%)	16 (30%)	20 (38%)	16 (34%)	N/A
No. of asks to businesses (for the purposes of fundraising)	41,339	19,152	12,936	10,110	N/A
No. of complaints	184	209	285	2,504	N/A
Ratio of complaints to asks made	1:225	1:92	1:45	1:4	N/A

Due to a historic change in the method name and definition, data comparison is not possible for 2019/20.

# **Common reasons for complaints about corporate (%)**

	2021/22 2022/23 2023/24
Partnership not considered appropriate	7 11 22
Activity of partnership not considered appropriate	1 18
Other complaints	28
Dislike of method	3 5 13
Overall execution of activity	2 6 7
Content of approach	1 1 3
Donation amount requested	0 0 1
Tone of approach	0 0 1

#### **Charity bags**

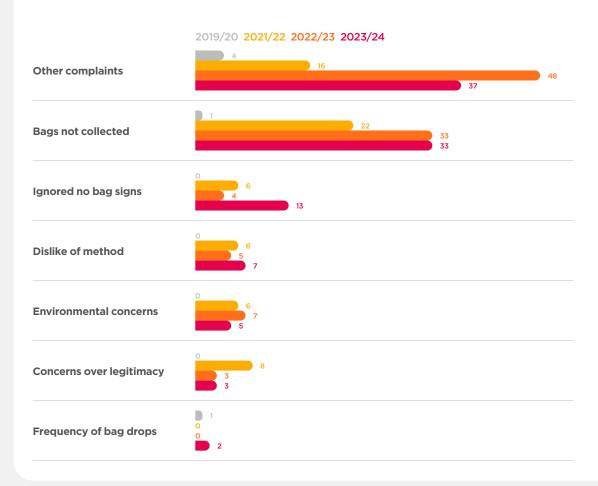
Complaints about charity bags represented less than 1% of all complaints received by the sample charities in 2023/24. Complaints fell significantly (by 37%) from 136 in 2022/23 to 86 in 2023/24. Activity decreased by 12% from around 11.8 million charity bags distributed in 2022/23 to around 10.4 million distributed in 2023/24. The ratio of complaints to activity decreased significantly from around one complaint for every 87,000 charity bags distributed in 2022/23, to around one complaint for every 121,000 charity bags distributed in 2023/24. As a result, charity bags were significantly less likely to generate complaints than in previous reporting years.

Charity bags remain a rarely used approach for the sample charities, with just 13% using this method in 2023/24. Fifty-seven percent of charities using charity bags reported at least one complaint in 2023/24. Given the small sample, comparisons with the number of charities using charity bags in previous years are less meaningful. Charity bag fundraising activity has increased significantly since the coronavirus pandemic, but is yet to reach the pre-coronavirus levels of 2019/20, when almost 18 million bags were distributed by the sample charities.

The most commonly given reason for complaints about charity bags was 'bags not collected', which was mentioned in 33% of all complaints in 2023/24. This reason was also cited in 33% of complaints in 2023/24. The next most commonly given reason was 'ignored no bags sign' which increased from 4% in 2022/23 to 13% in 2023/24, the highest level in recent years. There was limited insight from the small number of charities reporting complaints (4 out of 7) about how they responded to these issues.

Charity bags	2023/24	2022/23	2021/22	2020/21	2019/20
No. and % of sample using charity bag fundraising	7 (13%)	8 (14%)	7 (13%)	6 (11%)	7 (13%)
No. and % of sample using method who reported complaints	4 (57%)	3 (38%)	4 (57%)	5 (83%)	8 (114%)
No. of bags distributed	10,382,109	11,794,191	2,258,429	4,177,605	17,905,686
No. of complaints	86	136	49	86	203
Ratio of complaints to bags distributed	1:120,722	1:86,722	1:46,090	1:48,577	1:88,205

#### Common reasons for complaints about charity bags (%)



#### **Unaddressed mail**

**Note:** please refer to the glossary in the annex on page 76 to see the difference between unaddressed mail and addressed mail.

Complaints about unaddressed mail represented less than 1% of all complaints received by the sample charities in 2023/24. Complaints increased by 15% from 73 in 2022/23 to 84 in 2023/24. Activity fell significantly (by over 30%) from around 144 million pieces of unaddressed mail sent in 2022/23 to around 99 million pieces in 2023/24. As a result, the ratio of complaints to activity significantly increased, from around one complaint for every 2 million pieces of unaddressed mail in 2022/23, to around one complaint for every 1.2 million pieces in 2023/24. Unaddressed mail was a more commonly used approach for the sample charities in 2023/24 than in recent years, with 49% using this method in 2023/24. Forty-two percent of the charities using unaddressed mail reported complaints in 2023/24.

The most commonly given reason for complaints about unaddressed mail was 'dislike of method', which was reported in 37% of all complaints in 2023/24. 'Dislike of method' was not cited in any complaints in 2022/23 but has been the most commonly given reason in previous years. 'Data protection or permission issues' was cited in 19% of complaints in 2023/24, which is a significantly higher proportion than in previous years. Charities that received complaints indicated the complaint numbers were too low in relation to volume to merit specific changes to their processes.

2023/24	2022/23	2021/22	2020/21	2019/20
26 (49%)	21 (37%)	21 (38%)	25 (45%)	26 (46%)
11 (42%)	9 (43%)	13 (62%)	17 (68%)	17 (65%)
99,247,834	143,727,601	138,199,193	102,112,7393	5,454,965
84	73	147	109	94
1:1,181,522	1:1,968,871	1:940,131	1:936,814	1:377,180
	26 (49%) 11 (42%) 99,247,834 84	26 (49%) 21 (37%)   11 (42%) 9 (43%)   99,247,834 143,727,601   84 73	26 (49%) 21 (37%) 21 (38%)   11 (42%) 9 (43%) 13 (62%)   99,247,834 143,727,601 138,199,193   84 73 147	26 (49%) 21 (37%) 21 (38%) 25 (45%)   11 (42%) 9 (43%) 13 (62%) 17 (68%)   99,247,834 143,727,601 138,199,193 102,112,7393   84 73 147 109

# Common reasons for complaints about unaddressed mail (%)

	2019/20 2021/22 2022/23 2023/24	
Dislike of method	0 37	66
Data protection or permission issues	0 1 19	
Campaign content	12 3 12 13	
Communication to deceased individual	0 3 8 13	
Frequency of communication	15 14 15 12	
Accompanying enclosures	6 1 5 2	
Poorly addressed communication	2 0 1 1	
Campaign fulfilment	5 3 1 1	
Other complaints	1 5 0 1	
Tone of appeal	3 0 5 0	

#### **Street fundraising**

Complaints about street fundraising represented less than 1% of all complaints received by the sample charities in 2023/24. Complaints fell significantly (by 30%) from 104 in 2022/23 to 73 in 2023/24. Activity increased significantly (by 43%) from approximately 22,000 sign-ups in 2022/23 to approximately 32,000 in 2023/24. As a result, the ratio of complaints to activity significantly dropped, from one complaint for every 215 sign-ups in 2022/23, to one complaint for every 439 in 2023/24, meaning street fundraising was half as likely to generate a complaint in 2023/24.

Street fundraising was an even less common approach for the sample charities in 2023/24 than in previous years, with just 9% using this method in 2023/24. Four of the five charities using street fundraising received complaints with one organisation receiving 80% of all complaints.

In line with previous years, 'fundraiser appearance or behaviour' was by far the most commonly given reason for complaints, as it was cited in 68% of all complaints in 2023/24. 'Dislike of method' was mentioned in 22% of complaints in 2023/24, significantly more than in previous years. The charities that received complaints responded to individual issues with fundraiser behaviour but did not consider that the concerns raised merited changes in their overall street fundraising processes.

<b>2022/23</b> 10 (18%)	<b>2021/22</b> 8 (14%)	<b>2020/21</b> 6 (11%)	<b>2019/20</b> 12 (21%)
10 (18%)	8 (14%)	6 (11%)	12 (21%)
8 (80%)	5 (63%)	6 (100%)	13 (108%)
22,396	22,228	6,556	45,582
104	78	51	236
1:215	1:285	1:129	1:193
	22,396 104	22,396 22,228 104 78	22,396 22,228 6,556   104 78 51

# Common reasons for complaints about street (%)

Fundraiser appearance or behaviour	2019/20 2021/22 2022/23 2023/24 44 51 68
Dislike of method	9 4 9 22
Other complaints	6 6 7
Campaign fulfilment	7 10 9 3
Content of script	4 1 1 0
Data protection	1 0 1 0
Fundraiser tone	25 2 0 0
Location of fundraisers	2 0 1 0

#### **SMS fundraising**

SMS fundraising is a fundraising ask sent to donors or potential donors by text message to request one-off cash/property or regular Direct Debit donations.

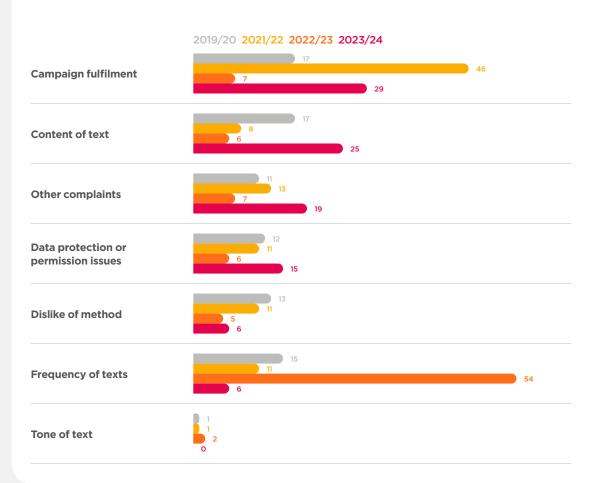
Complaints about SMS fundraising represented less than 1% of all complaints received by the sample charities in 2023/24. Complaints fell significantly (by 38%) from 84 in 2022/23 to 52 in 2023/24. Activity increased significantly (by 41%) from around 5.6 million SMS fundraising messages sent in 2022/23 to around 7.8 million in 2023/24. As a result, the ratio of complaints to activity significantly improved, from around one complaint for every 66,000 messages in 2022/23, to one complaint for every 151,000 in 2023/24. This means SMS fundraising was significantly less likely to generate complaints in 2023/24 than in any of the recent reporting years.

SMS fundraising remains a fairly common approach for the sample charities with 51% using this method in 2023/24. Almost half (48%) of the charities using SMS fundraising received complaints.

The most commonly given reason for complaints about SMS fundraising was 'campaign fulfilment', which was cited in 29% of all complaints in 2023/24. This was a significant increase on the 7% of complaints that mentioned this reason in 2022/23. 'Content of text' was mentioned in 25% of complaints in 2023/24, which was significantly more frequent than in recent years. Charities that received complaints indicated they did not consider that the issues raised required specific changes to their processes.

SMS	2023/24	2022/23	2021/22	2020/21	<b>2019/20</b> 35 (63%)	
No. and % of sample using SMS	27 (51%)	30 (53%)	33 (59%)	28 (50%)		
No. and % of sample using method who reported complaints	13 (48%)	11 (37%)	14 (42%)	8 (29%)	13 (37%)	
No. of texts sent	7,826,152	5,557,128	6,569,382	3,437,547	2,561,602	
No. of complaints	52	84	104	55	130	
Ratio of complaints to texts sent	•		1:63,167	1:62,501	1:19,705	

#### Common reasons for complaints about SMS (%)



# Appendicies

# APPENDIX A: METHODOLOGY

This Annual Complaints Report is split into two parts:

**Part one:** complaints received by the Fundraising Regulator.

**Part two:** complaints reported by a sample of the UK's largest fundraising charities.

The data for both parts is for the period 1 April 2023 to 31 March 2024.

# Part one methodology

In this report, we focus on the themes arising from the complaints the Fundraising Regulator receives that are both about charitable fundraising and within the scope of our regulatory remit.

By charitable fundraising, we mean fundraising activity that is within the scope of the Code of Fundraising Practice. This is asking for money or other property for charitable, benevolent, or philanthropic purposes.

People or organisations can ask for donations for a non-charitable cause or to personally benefit someone in need, but we do not regulate this type of activity.

By "within the scope of our regulatory remit", we mean those cases that are appropriate for the Fundraising Regulator to consider investigating as the lead regulator, or as part of an investigation together with another regulatory body. Some of the complaints that we classify as outside of our remit may relate in part to charitable fundraising, but there are aspects of the case that make it more appropriate for another organisation to investigate – such as concerns about wider governance or fraud.

#### Part two methodology

The charities included in the sample were identified as spending more than £5 million per year on their fundraising, according to data submitted to the Charity Commission for England and Wales for the year ending 31 December 2014.

The charities in the sample complete a survey each year about their fundraising activity and the number of complaints received for each of the fundraising methods listed in the glossary (see page 76). When we refer to 'sample charities' we mean those that have provided us with this data. Charities are also asked to provide optional information about the reasons why a complaint has been received.

#### **Data limitations**

We do not provide a definition of what makes a complaint to the charities and therefore this report reflects what each organisation has treated as a complaint, rather than a universal standard.

For some methods, there are very few complaints or reasons reported, so this data should be interpreted with caution. We have not reported in detail about fundraising methods that have consistently received fewer than 50 complaints for this reason.

As charities can provide more than one reason for each complaint, and not all charities provide this data, percentages may not add up to 100%.

We ask charities to report volumes of activity has taken place whether they have recorded complaints against a method or not. In 2019/20, charities only reported activity when they had recorded a complaint against it.

#### Changes to data

See the <u>Annual Complaints Report 2021/22</u> for information about historic changes to the methodology.

# APPENDIX B: SURVEY GLOSSARY

The definitions of 'free draws and prize competitions fundraising' and 'lotteries and raffles fundraising' have changed compared to 2021/22 to better align with terms used in the Code of Fundraising Practice. Minor amendments have been made to other definitions for clarity, but these are not material. **Addressed mail fundraising:** Fundraising communications that are sent through the post and addressed to a named individual living at the property.

#### 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.

**Charity bags fundraising:** Fundraising which involves distributing charity bags to households with the purpose of obtaining clothes and/or other goods for resale and/or recycling.

**Charitable institution:** A charity (registered or unregistered) or voluntary organisation established for purposes which may not be strictly charitable in law, but which are philanthropic or benevolent.

**Corporate fundraising:** Fundraising activities run with a commercial partner and/ or commercial participator. This includes, for example, campaigns involving cause related marketing, sponsorship deals and 'charity of the year' activities.

- A commercial partner is a partnership between a charitable institution and a commercial company where the commercial company provides money, skills or other resources to the charitable institution.
- A commercial participator is any person who carries on a business and, in the course of that business, promotes goods or services on the basis that it will make donations to a charitable institution.

**Donation:** A gift of money or other property that is voluntarily given and accepted without expecting or receiving something in return.

**Donor:** A person who gives a donation to a charitable institution.

**Door-to-door fundraising:** Fundraising which involves going door-to-door (also called 'house-to-house') to donors or potential donors, to request one-off cash/ property or regular Direct Debit donations.

**Email fundraising:** Fundraising communications that are sent to donors or potential donors using email.

# Free draws and prize competitions fundraising

- Free draws: 'Gaming' based fundraising that must either be completely free to enter or have a free method of entry.
- Prize competitions: 'Gaming' based fundraising that involves a level of knowledge or judgement, or an element of skill (such as by answering a question) for entry.

**Fundraising:** Asking for money or other property for charitable, benevolent, or philanthropic purposes.

#### Lotteries and raffles fundraising

- Lotteries: A type of gambling in which people pay to enter and prizes are allocated either totally by chance or, if the way prizes are allocated involves a series of processes, the first of those processes relies totally on chance.
- Raffles: A type of lottery in which the prizes are goods rather than money.

**Major donor fundraising:** Fundraising activity that involves interacting with major donors or potential major donors.

**Online fundraising:** A fundraising ask that is hosted on a website or app 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.

 An online fundraising platform is a website or application run by a commercial company, not-for-profit organisation, charitable institution or a person, which charitable institutions can use for fundraising, or which people or organisations can use for crowdfunding for charitable, philanthropic and benevolent purposes.

**Print media fundraising:** A fundraising ask that is included in printed media, such as magazines or newspapers. This includes magazine and newspaper inserts.

**Private site fundraising:** Fundraising which involves approaching the public on private land (for example, at supermarkets or shopping centres) to request one-off cash/ property or regular Direct Debit donations.

#### Public outdoor advertising fundraising: $\mbox{\sc A}$

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.

#### Radio advertising fundraising: $\boldsymbol{A}$

fundraising ask that is broadcast on a local, national or digital radio station.

**Restricted funds:** Restricted funds are funds to be used for specific purposes, set out by, for example, the donor, grant maker, or the terms of a public appeal. Restricted funds may not be spent on any other part of the charity's work.

**SMS fundraising:** A fundraising ask sent to donors or potential donors by text message to request one-off cash/property or regular Direct Debit donations.

**Social events fundraising:** Fundraising activity that has a specific 'social' focus, such as an event (possibly with ticketed entry). This could include, for example, a coffee morning or a pub quiz.

**Static collections fundraising:** Collections using collecting boxes which stay in one place.

**Street fundraising:** Fundraising which involves approaching members of the public on the street to request one-off cash/ property or regular Direct Debit donations.

**Telephone fundraising:** A fundraising ask that is made to donors or potential donors by telephone to request one-off cash/ property or regular Direct Debit donations.

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 advertising fundraising events.

Trust and foundation fundraising:

Fundraising which involves charitable institutions applying to trusts and foundations for grant funding.

**Unaddressed mail fundraising:** Fundraising communications that are sent through the post and are not addressed to a named individual living at the property but instead, for example, to 'the Occupier'.

**Volunteer fundraising:** Fundraising activity carried out by an individual acting as an 'on behalf of' volunteer fundraiser, who works with and who is under the instruction of a charitable institution to raise funds on its behalf and in its name.

# APPENDIX C: OVERVIEW OF COMPLAINTS REPORTED BY CHARITIES

	Organisations using method				Organisations reporting complaints					
Fundraising method	2023/24	2022/23	2021/22	2020/21	2019/20	2023/24	2022/23	2021/22	2020/21	2019/20
Addressed mail	52	56	56	56	56	48	51	55	53	54
Challenge and sponsorship events	49	53	51	43	42	26	28	29	23	31
Charity bags	7	8	7	6	7	4	3	4	5	8
Corporate	51	53	53	47	0	17	16	20	16	0
Door-to-door	26	30	25	14	25	26	29	24	17	25
Email	53	57	56	56	56	44	45	46	46	46
Free draws and prize competitions	18	19	20	15	0	6	4	8	5	0
Lotteries and raffles	36	44	42	40	33	29	34	33	36	33
Major donor	48	52	51	48	0	9	10	8	9	0
Online	52	56	54	53	54	28	38	37	40	29
Print media	36	38	38	30	45	10	8	8	4	8
Private site	38	37	31	21	34	33	34	26	19	32
Public outdoor advertising	25	23	25	19	0	3	5	3	2	0
Radio advertising	25	20	22	26	0	8	6	6	3	0
SMS	27	30	33	28	35	13	11	14	8	13
Social events	30	34	24	21	29	16	14	9	12	14
Static collections	27	32	27	19	0	5	9	10	6	0
Street	5	10	8	6	12	4	8	5	6	13
Telephone	46	46	45	46	46	34	34	40	38	36
Television advertising	43	40	41	46	41	34	31	32	36	26

				Total reported	l complaints
Fundraising method	2023/24	2022/23	2021/22	2020/21	2019/20
Addressed mail	2,991	3,485	3,508	3,687	4,054
Challenge and sponsorship events	1,790	1,915	1,256	681	2,063
Charity bags	86	136	49	86	203
Corporate	184	209	285	2,504	0
Door-to-door	3,752	4,056	1,936	752	2,413
Email	4,493	1,542	1,329	1,534	1,053
Free draws and prize competitions	23	14	40	43	0
Lotteries and raffles	596	653	467	515	959
Major donor	35	17	19	16	0
Online	663	3,692	3,593	5,836	1,660
Print media	15	15	23	9	70
Private site	776	817	560	115	1,402
Public outdoor advertising	7	13	7	4	0
Radio advertising	27	21	32	14	0
SMS	52	84	104	55	130
Social events	439	245	218	375	1,757
Static collections	320	271	169	60	0
Street	73	104	78	51	236
Telephone	463	462	402	509	1,040
Television advertising	340	330	729	715	430
Trusts and foundation	5	6	5	10	0
Unaddressed mail	84	73	147	109	94
Volunteer	231	150	148	120	440

				Ratio of complai	nts: to activity
Fundraising method	2023/24	2022/23	2021/22	2020/21	2019/20
Addressed mail	1:22,391	1:18,353	1:19,003	1:17,142	1:17,473
Challenge and sponsorship events	1:1,914	1:395	1:3,803	1:6,947	1:2,962
Charity bags	1:120,722	1:86,722	1:46,090	1:48,577	1:88,205
Corporate	1:225	1:92	1:45	1:4	0
Door-to-door	1:6,548	1:5,441	1:9,724	1:4,760	1:7,465
Email	1:84,826	1:201,589	1:228,854	1:176,878	1:107,134
Free draws and prize competitions	1:95,762	1:31,145	1:9,867	1:97,631	0
Lotteries and raffles	1:136,793	1:130,378	1:157,679	1:134,604	1:100,561
Major donor	1:668	1:1,147	1:1,155	1:1,231	0
Online	1:14,533,015	1:2,958,408	1:2,483,579	1:1,886,192	1:3,284,551
Print media	1:23,581,414	1:34,902,639	1:19,376,906	1:40,192,132	0
Private site	1:704	1:713	1:665	1:450	1:418
Public outdoor advertising	1:174,913,095	1:26,030,614	1:382,511,025	1:49,453,416	0
Radio advertising	1:47,594,528	1:38,177,020	1:24,796,684	1:42,605,326	0
SMS	1:150,503	1:66,156	1:63,167	1:62,501	1:19,705
Social events	1:553	1:856	1:1,067	1:965	1:258
Static collections	1:680	1:880	1:2,492	1:5,400	0
Street	1:439	1:215	1:285	1:129	1:193
Telephone	1:7,466	1:4,536	1:5,689	1:4,175	1:2,143
Television advertising	1:32,813,051	1:24,287,470	1:13,963,238	1:14,604,442	1:13,365,894
Trusts and foundation	1:6,442	1:4,943	1:6,996	1:3,012	0
Unaddressed mail	1:1,181,522	1:1,968,871	1:940,131	1:936,814	1:377,180
Volunteer	1:199	1:248	1:361	1:564	1:168

Due to either historic low volumes of complaints or changes in fundraising method names and definitions made in 2020/21, some data is either not available or not comparable for 2019/20. It is not possible to directly compare against 2019/20 ratios due to changes in the way we collected activity data (see page 74).





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