



FUNDRAISING
REGULATOR

Annual Complaints Report 2021/2022

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BACKGROUND

About the Fundraising Regulator

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 registered primarily in these countries. Fundraising by those only registered in Scotland is subject to adjudication by the Scottish Fundraising Adjudication Panel.

Our vision is a society where charitable fundraising is open, honest and respectful, so that people have confidence and trust in fundraising, and charitable fundraising thrives. Visit our website for more [about us](#) and the scope of our regulation.

Our approach to casework

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. We do this by assessing whether organisations have complied with the [Code of Fundraising Practice](#).

We prioritise local resolution and informal mediation. This means that we generally ask that people make a complaint to the fundraising organisation they have concerns about before contacting us. We also seek to work with all parties involved to reach a resolution without the need for formal investigation, where it is possible and proportionate to do so.

We will investigate where there may be non-compliance with the code and this poses an actual or potential risk to the public, the fundraising sector, or public confidence in fundraising more generally. We publish summaries of our investigations to share learning with the sector and enable the public to make informed decisions when they donate to charity. Our [complaints process](#) explains our approach in more detail.

When a complaint is not within our regulatory remit, we will always try to signpost the complainant to another body that may be able to help them.

EXECUTIVE SUMMARY

In this report, we present insights from the Fundraising Regulator's casework (see part one, pages 9-27) alongside complaints reported by a sample of the UK's largest fundraising charities (see part two, pages 28-56) for the period 1 April 2021 to 31 March 2022. This data is analysed in the context that charitable fundraising continued to be affected by the coronavirus (COVID-19) pandemic (see page 8).

Part one

In part one of this report, we focus on three overarching themes: presenting information in an open and honest way, protecting people in vulnerable circumstances and issues arising from working with third parties. We chose to focus on these themes because of the volume of complaints or breadth of fundraising methods related to the theme, and the potential impact for a donor or charity that could arise from similar complaints.

We conclude that charities need to carefully consider the content and structure of their fundraising materials; appropriately identify and respond well to signs of potential vulnerability; and adequately monitor third parties fundraising on their behalf.

Part two

In part two of this report, though for some methods complaint volumes to charities had risen between 2020/21 and 2021/22 – some significantly so – most had proportionally fewer complaints in relation to fundraising activity compared to 2019/20. We conclude that variations in complaint volumes were broadly due to changing activity levels and public mood linked to the pandemic.

Charities responded to complaints in a variety of ways, depending on the fundraising method. Many charities expressed that they had learned from the concerns they had received and gave examples of how they had implemented this in response. Examples include carrying out quality checks, providing training for fundraisers, reviewing frequency of contact, as well as reviewing or changing processes and procedures.

FOREWORD

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

For the second year, our Annual Complaints Report reflects the impact of the coronavirus pandemic.



Overall, the data for 1 April 2021 to 31 March 2022 indicates that digital tools are being used more often and by more charities, and that changes to fundraising activity levels affected the level of fundraising complaints.

In 2021/22, the fundraising methods commonly complained about to the Fundraising Regulator were broadly similar to previous years. This year, we've focused on sharing thematic information to draw out learning for the wider sector. Information about our casework performance can be found in our annual report and accounts.

The sample data from the UK's largest fundraising charities presents a mixed picture. It appears many charities had resumed using in-person methods previously paused or restricted.

Complaint numbers for some methods remained broadly similar, whereas others rose in line with increased activity. We've included additional information to enhance understanding about why complaints were received and the charities' actions in response.

That overall charity fundraising complaint numbers have reduced again this year is a testament to the commitment organisations have to good practice. However, many challenges face the fundraising sector as the impact of rising costs of living is increasingly felt. We will continue to review the support and guidance we can offer to make sure good practice is maintained.

This report does not cover concerns about fundraising not considered 'charitable' for our regulatory purposes. However, it is worth noting that the public did get in touch with us about personal cause fundraising, often following high profile media stories. This – together with other concerns outside our regulatory remit – in part accounts for the overall increase in our casework volumes this year.

We let people know that this type of activity is not regulated by the Fundraising Regulator and signposted them to the police or Action Fraud where people had concerns about fraud. We are monitoring the changing role of fundraisers as part of our ongoing strategic work.

This is the first complaints report released within our new Strategic Plan period 2022-27. Over the next five years, we will continue to develop our proactive approach to regulation. We've already introduced, and are keeping under review, a self-reporting pathway for non-compliance with the code. The intelligence we gather through this pathway, the complaints report and other data sources, helps us to identify and understand fundraising trends.

Finally, considerable thanks are due to the charities that have contributed their time and data to this report over the years. Their contribution has been critical to making this report increasingly valuable. We look forward to building on recent engagement with and feedback from the sample charities, and working with the sector more widely over the coming years, to further improve the usefulness of the report.

This is the first complaints report released within our new Strategic Plan period 2022-27. Over the next five years, we will continue to develop our proactive approach to regulation.



CONTEXT FOR FUNDRAISING

18 Mar 2020	Chartered Institute of Fundraising and Fundraising Regulator advise charities to reflect seriously on whether to continue public fundraising.
26 Mar 2020	National lockdown measures legally come into force.
25 Jun 2020	Chartered Institute and Fundraising Regulator publish guidance to support a return to fundraising in line with social distancing .
4 Jul 2020	UK's first local restrictions enforced in parts of Leicestershire.
5 Nov 2020	National lockdown measures enforced .
6 Jan 2021	National lockdown measures enforced .
Apr 2021	Some non-essential shops, outdoor and indoor venues reopen .
8 Dec 2021	Measures announced in England in response to Omicron variant.
24 Feb 2022	Formal end of restrictions in England ; invasion of Ukraine.

Based on information from the Institute for Government and other sources.



Coronavirus (COVID-19) pandemic

Fundraising was still affected by the pandemic with legal requirements differing between England, Wales, Northern Ireland and Scotland as restrictions eased. Concerns about the Omicron variant led to tighter restrictions in December 2021. The government in England formally ended legal restrictions in England on 24 February 2022, with the devolved nations doing so later.

Conflict in Ukraine

On 24 February 2022, the Russian Federation invaded Ukraine. The response from the UK public quickly affected the fundraising landscape. For example, a new record was set for the most money raised by an online campaign in one week when nearly £62 million was donated to the Disasters Emergency Committee – this campaign had raised over £380 million by the start of September 2022. Due to the timing of this reporting period, any learning from complaints related to Ukraine fundraising appeals will be reflected in future reports.

Guidance for emergency fundraising

Fundraising appeals set up in response to emergencies or disasters often raise significant amounts in a brief time frame. Nevertheless, the same standards apply in an emergency as for ‘business as usual’ circumstances.

Charity Commission for England and Wales
[Charity emergency appeals: starting, running and supporting charitable emergency appeals \(CC40\)](#)

Fraud Advisory Panel
[An introduction to fundraising in an emergency help sheet](#)

Fundraising Regulator
[Tips for giving safely to charity](#)

PART 1

Complaints received by the Fundraising Regulator



1 April 2021 –
31 March 2022

INTRODUCTION

The purpose of this part 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 58).

Key findings

- Complaints about misleading information increased by 17% (from 60 in 2020/21 to 70 in 2021/22) and over half of these related to either digital (31 of 70) or advertising (12 of 70) fundraising. Charities need to consider the content and structure of their fundraising materials to make sure that information on different channels is open, honest and not likely to mislead.
- Vulnerability is explicitly mentioned in a small number of cases (15 in 2021/22 and 12 in 2020/21) but is threaded through many complaints where other issues are of primary concern. The breadth of activities that result in complaints, and the potential impact for both the donor and charity, mean it is important for fundraisers to appropriately identify and respond well to these circumstances.
- Concerns about fundraiser behaviour, dislike of method, and pressure to donate often feature in complaints about fundraising methods that are commonly carried out by third parties on behalf of a charity. Where we do investigate, we find that charities often fail to adequately monitor third parties or to handle complaints effectively.



OVERVIEW OF OUR CASEWORK DATA

Incoming and closed casework

In 2021/22 we received 1,080 incoming cases overall – a 19% increase on 2020/21 (907 cases). We closed 1,040 cases in this reporting period (of which 25 were received in 2020/21).

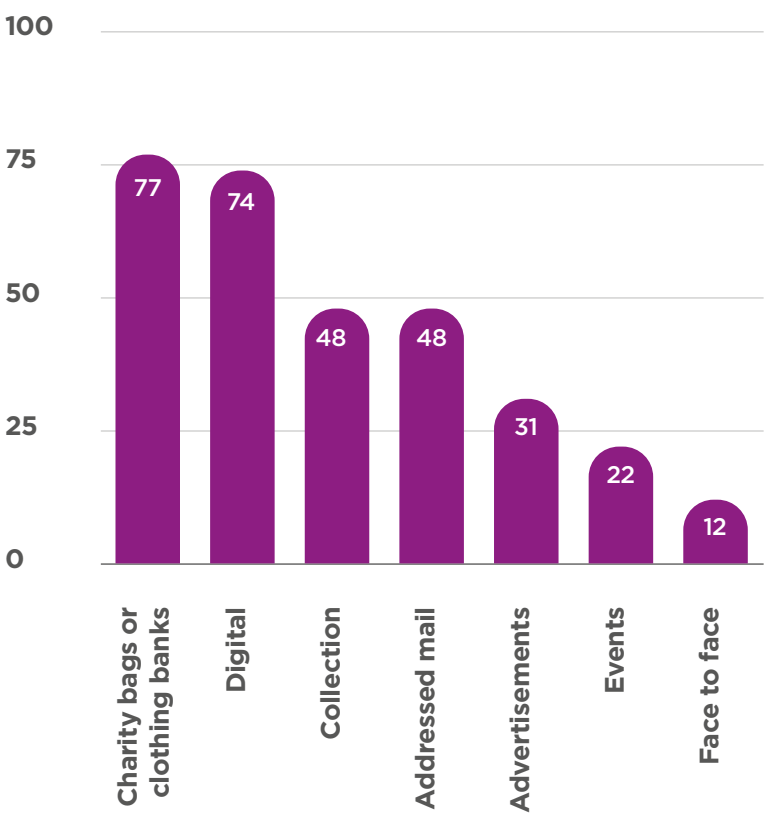
Of the closed cases, we identified 381 complaints that were both about charitable fundraising and within the scope of our regulatory remit.

The majority of the remaining cases were outside the scope of our regulation, raising concerns on topics including potential fraud and charity governance – for more information, see the methodology (page 58).

Methods and themes

The methods that generated the most concerns were charity bags and clothing banks (77 of 381), digital (74), collections (48), addressed mail (48) and adverts (31). These five methods accounted for almost three quarters of the complaints within our regulatory scope (73%).

Complaints about fundraising methods (where known)



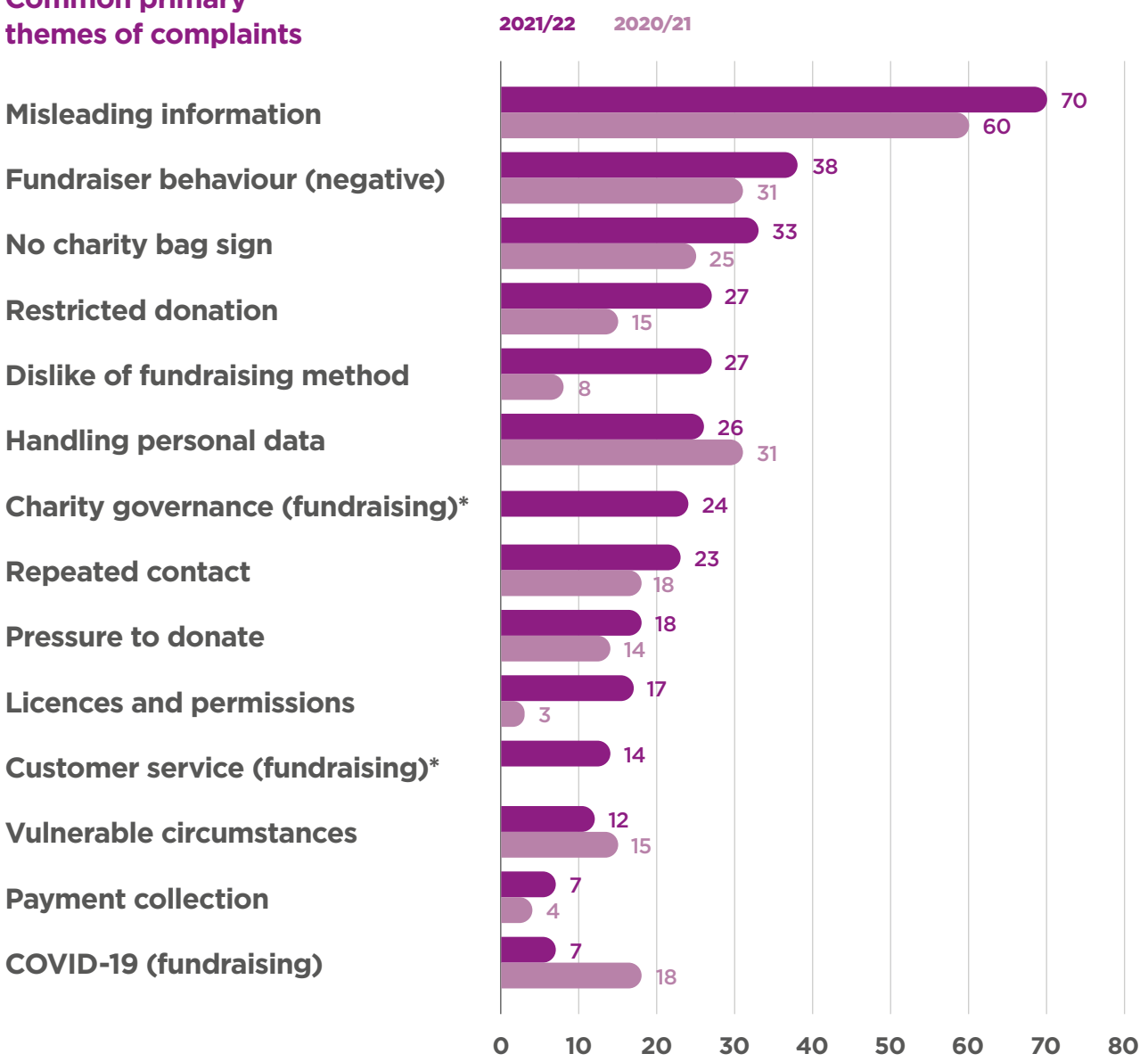
We have further refined our categories for recording method data so direct comparison is not possible with figures originally presented in the Annual Complaints Report 2020/21.



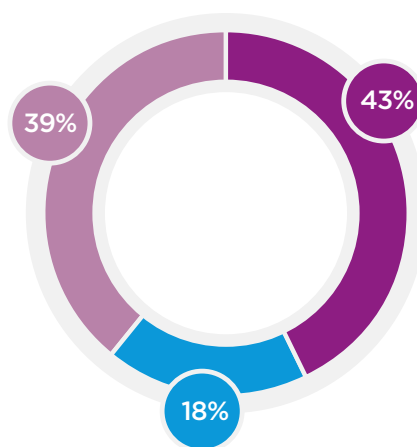
Reviewing complaints thematically, most related to misleading information (70 of 381), fundraiser behaviour (38), restricted donations (27) or a dislike of the method (27). Some specific complaints were also received about not respecting a sign on the front door of a household that indicates that the resident does not wish to receive charity bags (33 of 381).

*Historically these thematic categories did not distinguish between fundraising and non-fundraising related concerns for charity governance or customer service, so year on year comparison is not possible.

Common primary themes of complaints

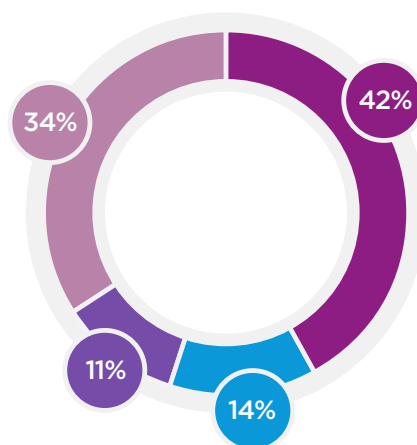


As can be expected, there is a link between some of the methods that were most complained about and the most common themes. For example, in 2021/22 six in ten complaints about charity bags related to ignoring 'no charity bag' signage or dislike of method and over two thirds of complaints about digital fundraising methods related to either misleading information, restricted donations or negative fundraiser behaviour.



Complaints about charity bags or clothing banks by theme*

No charity bag sign	33	(43%)
Dislike of fundraising method	14	(18%)
Other	30	(39%)



Complaints about digital fundraising by theme*

Misleading information	31	(42%)
Restricted donation	10	(14%)
Fundraiser behaviour (negative)	8	(11%)
Other	25	(34%)

THEME ONE: PRESENTING INFORMATION IN AN OPEN AND HONEST WAY

There is evidence that digital tools are being used more often and by more charities. Polling by the Charities Aid Foundation found that 51% of charities plan to do more digital activity¹ and the Charity Digital Skills report found that 82% see digital as more of a priority due to the pandemic².

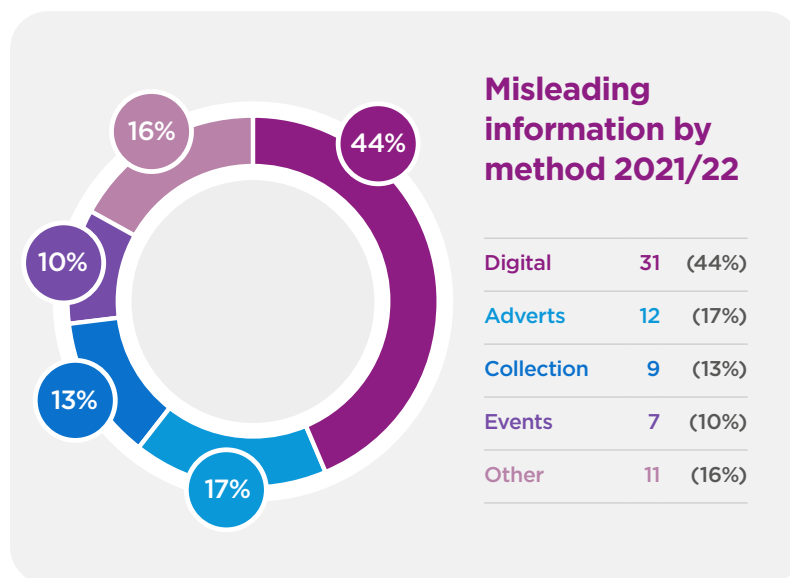
With increased activity, it is not surprising that digital fundraising methods are some of the most complained about. Charities need to consider both the presentation and content of fundraising materials on different channels to make sure they are being open and honest, and that the information is not likely to mislead.

By digital fundraising we mean fundraising that took place using email, social media, online fundraising platforms or other digital channels.

1. CAF Charity Landscape report 2022; <https://www.cafonline.org/about-us/publications/charity-landscape-2022>
2. Charity Digital Skills Report 2022; <https://charitydigitalskills.co.uk/>
3. Advertising Standards Authority Annual Report 2021; <https://www.asa.org.uk/resource/annual-report-2021-full-report.html> (additional contextual information provided directly by the ASA)

Misleading information continues to be the most common theme

In 2021/22 complaints where the primary theme was misleading information increased by 17% (from 60 in 2020/21 to 70). The fundraising method most commonly linked to this theme was digital, followed by adverts and collections.



Other organisations saw increased complaints about adverts

The Advertising Standards Authority found the complaints it received about non-commercial organisations had increased by more than a quarter from 3,587 in 2020 to 4,545 in 2021. Most of these related to campaigns by charities, which indicates that our data is not an isolated trend. The ASA found that complaints tended to be about adverts being over-emotive or disturbing, the time and location of adverts, or concerns that people who may be vulnerable were being targeted. However, most organisations complained about were found to be compliant with the advertising codes. The concerns are an indicator of public sentiment, but are not in themselves evidence that the information was misleading³.

People have different motivations for complaining

Sometimes we receive complaints from supporters of a charity who are concerned that the way information is presented in a specific fundraising campaign is potentially misleading, and may undermine the integrity of the charity's overall message. In other cases, we receive complaints from people who appear to disagree with the aims and goals of a charity, and feel strongly that its overall fundraising messaging is misleading.

It is inevitable that some causes are more likely to be seen as controversial and could face a higher level of scrutiny from those whose values or views do not align. We consider whether fundraising organisations are compliant with the Code of Fundraising Practice. It is not our role to make a value judgement where an organisation and a complainant have differing ethical views.

Diversification of channels poses challenges to presenting information

Our working definition of a fundraising material is “anything that includes language which asks the public to support or donate to a charity by giving money, goods or other property”. It is important to consider not just the content, but also whether the structure of materials is likely to mislead or be misinterpreted.

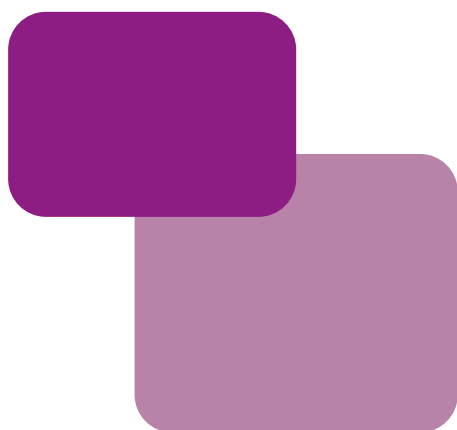
For example, where website ‘donate’ buttons are positioned can be important to the way someone understands how their donation will be used. They may feel misled if they later realise what happened does not match their original expectations. A button or appeal banner across every webpage could mean all the website content is effectively fundraising material.

Describing fees or transactions as donations

Some complaints related to concerns that fees or charges were misleadingly described as donations. Charities should consider whether their organisation has correctly described the type of payment being asked for. If a payment or sum of money is mandatory to access services or goods, it cannot accurately be described as a donation.

Code glossary: donation

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



Learning from our casework

The complaint

The complainant believed a charity had made false claims in a fundraising appeal video that was shown on several online channels. They felt that the specific words used in the appeal misrepresented and exaggerated the charity's activities, and unfairly criticised and insulted others.

Our decision

We found that the charity's assertions, based on its view of the facts and research, were not misleading or likely to mislead. The video set out the charity's ethical stance, but it did not criticise or insult any specific people or organisations. It was also able to back up its claims by pointing to relevant research. The charity was therefore compliant with the code.

The outcome

The complainant requested an external review of our decision. An independent reviewer acknowledged that the complainant had a differing ethical view to the charity which meant they disagreed with how evidence was interpreted and language used. The reviewer considered that the complaint did not meet the threshold for a full external review process, as our decision was not unreasonable.



Mitigating complaints about the way information is presented

Carefully consider structure and content

Charities must take care that the messaging and structure of any fundraising materials is not likely to mislead. This may be more difficult on channels that restrict the information that can be shared, such as those with a limited character count or video length.

Use evidence and keep detailed records

Charities can keep a detailed record of any evidence sources and factors they have considered so this can be easily referenced if asked. It may not be possible to make a direct link between the fundraising material and any evidence, so consider how websites can be used as a general resource to refer back to if needed.

Carry out regular risk assessments

Charities must consider the possibility of a challenge to any claims. If a campaign or cause is likely to be contentious, make sure trustees, staff and volunteers know the steps that will be taken if the situation escalates.

Responding to complaints about the way information is presented

Respond in good faith

Charitable institutions and third party fundraisers must be open and honest when responding to complaints. If it appears that a complaint is unfounded or the complainant is mistaken, fundraisers should still be respectful when engaging with the complainant.

Fully acknowledge the substantive points

When responding, provide enough detail to acknowledge the specifics of the complaint, and refer to evidence. If an organisation has got something wrong, it should be open about what will be done to put things right.

Consider how to respond to unacceptable behaviour

Upsetting circumstances may mean people act out of character. A policy that sets out how an organisation will respond to unacceptable behaviour in an appropriate way will help to protect fundraising staff and volunteers from abuse.

Further guidance

Fundraising Regulator
[Complaints handling guidance for charities and third-party fundraising organisations](#)

Fundraising Regulator
[Key behaviours expected of fundraisers: guidance for fundraisers](#)

THEME TWO: PROTECTING PEOPLE IN VULNERABLE CIRCUMSTANCES

The theme of vulnerable circumstances is explicitly mentioned in a small number of the cases we receive (15 in 2021/22 and 12 in 2020/21) but is often threaded through many complaints where other issues are of primary concern. Identifying potential signs of vulnerability can be complex, so it is important that fundraisers know how to engage appropriately with people they believe may be at risk.

Code glossary:

vulnerable circumstances

A state in which a person is especially susceptible to harm due to their personal circumstances. It is a state which can vary from day-to-day, which may affect the person's behaviour or decisions and needs a flexible response.

4. Data and analysis from Census 2021, Living longer and old-age dependency – what does the future hold?; Office for National Statistics; <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/ageing/articles/livinglongerandoldagedependencywhatdoesthefuturehold/2019-06-24>

Vulnerability can be hard to identify

Vulnerability can be temporary or long term, and influenced by a number of factors. It is important that fundraisers know how to identify the potential signs, whether an interaction is in-person or not. The breadth of activities that generated complaints include addressed mail, adverts, charity shops, collections, events, face to face fundraising, lotteries and free draws, and telephone fundraising.

Being respectful requires balanced judgement

Even when a fundraiser has followed best practice, the potential donor and their friends or relatives may have differing opinions about the degree to which they can make an informed decision to donate. This can be difficult to navigate. Though there are some circumstances where someone could be more at risk, this does not necessarily mean that they lack capacity.

Ageing populations may need to be factored into risk assessments

In the UK it is projected that by 2050 one in four people will be aged 65 or older⁴. It is not right to identify someone as vulnerable just on the basis of their age but when combined with other factors, being older and in poorer health may indicate a person is more likely to be vulnerable.

Dementia is an example that is often mentioned in our casework by concerned friends or relatives. This is an umbrella term for a range of medical conditions that affect memory, thinking, behaviour and the ability to perform everyday activities. Many of the conditions are progressive and the signs and symptoms can change from day to day. In a fundraising context, this means indicators of vulnerability may not always be obvious or even present during an interaction between a fundraiser and a potential donor.

People may object to asking children for donations

A small number of complaints related to fundraising involving young people. Although charities and third-party fundraisers must take all reasonable steps to avoid asking for regular donations from under 18s, the code does not prohibit asking for one-off donations. However, not everyone will be comfortable with this and some parents or guardians may object on behalf of their child. Also, fundraisers should be aware that what may not be considered undue pressure for most adults may feel different for a younger person.

The potential impact can be significant

The potential impact in this area can be significant, not only for the vulnerable person and their loved ones, but also the charity if this leads to a refund request or reputational damage. It is important that charities respond well when they are informed about a donor's vulnerability, including after the fundraising happens.

Trustees must act in their charity's best interests and must only refund donations in line with its policies or in exceptional circumstances. If it is unclear whether or not a charity should give a refund, it should consider getting legal advice. A charitable institution may also need to seek permission from its statutory charity regulator – be aware that guidance on refunding donations is changing in England and Wales as a result of the Charities Act 2022.

The Fundraising Preference Service (FPS)

One of the ways we help to protect people in vulnerable circumstances is by operating the FPS. This enables people to stop direct marketing contact from any charity registered with the Charity Commissions in England and Wales or Northern Ireland. Charities need to set themselves up on the FPS if they receive a request through the service to stop direct marketing. Visit our website for more information about the FPS.



Learning from our casework

The complaint

The complainant was unhappy that a charity representative had visited their home to collect a donation from an older relative. The relative was a long-term supporter of the charity and was shielding during the pandemic due to poor health. The complainant considered their relative to be vulnerable and had explained this to the charity. Despite a heated doorstep exchange, the representative entered the property to collect the donation. When a complaint was made, the charity maintained it had not done anything wrong and made disparaging remarks about the complainant. Ultimately, the poor handling of the complaint resulted in the charity refunding the donation.

Our decision

We found that the charity had not reconsidered whether it was right to collect the donation after being informed about the donor's vulnerability. The charity also showed a lack of empathy and unwillingness to listen throughout their complaints handling process. The charity was therefore not compliant with the code.

The outcome

The charity told us that it would introduce guidance on vulnerability, which we welcomed. We also recommended that the charity improved its complaints handling.



Mitigating complaints related to vulnerability

Develop appropriate policies and procedures

Charities must develop policies to guide how fundraisers identify and interact with people in vulnerable circumstances and have a clear policy on accepting and refusing donations. Make sure that those fundraising on behalf of the charity are familiar with its policies, as well as trained and monitored for compliance.

Keep detailed records

Good record keeping protects both the fundraiser and the potential donor, and demonstrates the decisions made throughout the whole fundraising journey. Be aware if recording any information that may count as special category data and requires consent to hold or share.

Comply with fundraising reporting requirements

The Charities (Protection and Social Investment) Act 2016 requires registered charities in England and Wales which have their accounts audited (where gross income is over £1 million) to provide information on how they deal with vulnerability in their trustees' annual report. We consider it good practice that all charities report on this information as it gives assurance that these issues are being addressed.

Responding to complaints related to vulnerability

Respond with empathy

Even if a fundraiser feels they have done everything right, try not to feel indignant. Striking the right tone from the outset will go a long way in determining whether the complaint is able to be resolved.

Recognise the nuance

Recognise that vulnerability is not always easy to identify. If fundraisers did not spot any potential indicators, this does not necessarily mean they have done anything wrong. It also does not mean that the person who has raised concerns is incorrect.

Be open to refunding donations if appropriate

It can be appropriate in certain circumstances for charities to refund donations if more information emerges about a donor's vulnerability. If the donation amount is significant, a charity may need to seek legal advice and permission to return the donation may be required from its statutory regulator.

Further guidance

Charity Commission for England and Wales
[Ex gratia payments by charities \(CC7\)](#)

Chartered Institute of Fundraising
[Accepting, refusing and returning donations](#)

Chartered Institute of Fundraising
[Treating donors fairly](#)

Fundraising Regulator
[Complaints handling guidance for charities and third-party fundraising organisations](#)

Fundraising Regulator
[The Charities \(Protection and Social Investment\) Act 2016: Fundraising reporting requirements guidance](#)

THEME THREE: ISSUES ARISING FROM WORKING WITH THIRD PARTIES

Charitable institutions work with a variety of people, groups and organisations to fundraise. For this report, we focus on issues that arise from working with third parties that carry out ‘on behalf of’ fundraising. The code states that charitable institutions are responsible for this fundraising and must have a complaints procedure which also applies to these types of fundraisers.

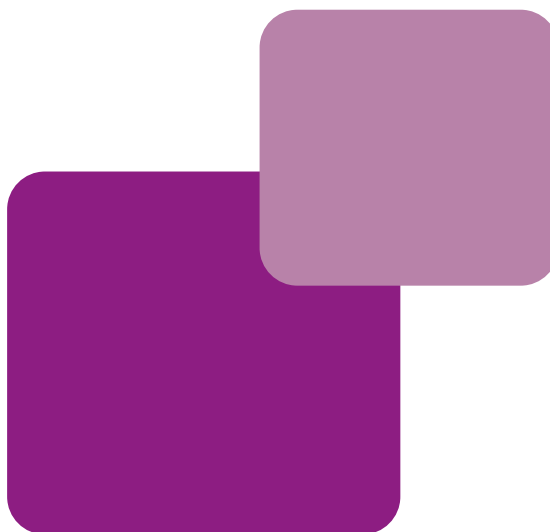
Code glossary: third-party fundraiser

Organisations or people that a charitable institution has authorised to fundraise on its behalf. They may be volunteers, professional fundraisers or commercial partners.

Working with volunteers

Volunteers do not receive payment or other significant benefit when fundraising for a charitable institution – although organisations can reimburse out of pocket expenses. Sometimes volunteer fundraising happens under the direct instruction of a charity (‘on behalf of’ fundraising) and sometimes without its direct instruction (‘in aid of’ fundraising). The distinction between the two is important because it determines whether, and to what degree, a charity is responsible for the fundraising activity.

In general terms, ‘on behalf of’ volunteer fundraisers must understand the behaviour that is expected of them, know the cause they are fundraising for and have a reasonable understanding of how donations will be spent so that they can answer any questions if asked.



Learning from our casework

The complaint

The complainant was unhappy about the behaviour of a volunteer fundraiser who was collecting money outside a supermarket during the pandemic, under the instruction of a charity. They were also unhappy that the volunteer had told them they were collecting for one purpose when it later turned out not to be the case.

Our decision

We were unable to reconcile the conflicting accounts of the complainant and charity about the volunteer fundraiser's behaviour. National pandemic guidance in England at the time was that public fundraising should cease and the charity was unable to supply evidence of its risk assessment. We found that the volunteer had inadvertently misled the complainant because the charity was not collecting funds for the purpose they had said on that day. The charity was not fully compliant with the code.

The outcome

We recommended that the charity reviewed its approach to decision making, including risk assessments, and how this was documented. We also recommended that it clearly defines the purpose of its fundraising and fully briefs its volunteers so they can give donors accurate information.



Mitigating complaints about volunteer fundraising

Be aware of the boundaries

The more that a charity knows about or has directed any fundraising activity, the more likely it is to be 'on behalf of' volunteer fundraising. However, the distinction between 'in aid of' and 'on behalf of' is not always clear cut. Consider taking further advice if the relationship and its associated responsibilities are unclear.

Make sure that volunteers are adequately supported

Charities must make sure any guidance and support they give is relevant to the nature of the relationship with the volunteer. Although the code does not say that charities must have written agreements with 'on behalf of' volunteer fundraisers, having key information in writing can help an organisation to be clear about what it expects and to manage any reputational risks.

Carry out background checks where appropriate

Charities must check that 'on behalf of' volunteer fundraisers are suitable to act as responsible people on its behalf. One example is meeting any legal duties regarding safeguarding checks.

Working with other types of third parties

When fundraising, certain types of third-party relationships are subject to specific requirements under the law of England, Wales and Scotland. Examples include when working with businesses that fundraise on a charitable organisation's behalf by collecting and distributing charity bags or carrying out face to face or telephone fundraising. See section seven of the code on professional fundraisers, commercial participators and partners for more information.

Charities must make sure that everything needed is in place before any fundraising starts as the potential impact resulting from getting the legal set up wrong can be significant. Also, if a charity does not make sure that third party fundraisers are trained and monitored, they will not be able to effectively understand if the third party's activity and behaviour is in line with the code when representing the charity.

Fundraisers frequently seek help to understand the standards that apply

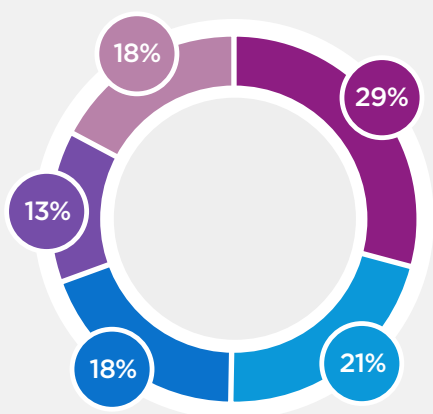
In 2021/22 we received a substantial number of enquiries about commercial participators, licenses and permissions, contracts and agreements, and solicitation statements – including a number of enquiries from businesses that wished to set up fundraising appeals in response to the Ukraine conflict. Also, during this period and the previous year, section seven of the code was one of the top three most visited sections on our website.

This indicates that many fundraisers seek guidance and support to understand the standards related to fundraising carried out by third parties. The code includes standards that reflect the law but it is not a legal handbook. Ultimately, a fundraising organisation is responsible for making sure it gets the advice needed to meet its legal requirements.

Some common themes are associated with methods often carried out by third parties

Fundraiser behaviour was the second most common theme after misleading information. Breaking this down further, it appears concerns are often expressed about methods such as collections, charity bags and face to face which are frequently carried out by third parties on behalf of a charity.

Fundraiser behaviour by method 2021/22



Collection	11	(29%)
Digital	8	(21%)
Clothing bags or clothing banks	7	(18%)
Face to face	5	(13%)
Other	7	(18%)

Other common themes are also associated with methods often carried out by third parties. For example, 44% of concerns about feeling pressured to donate related to collections or face to face.

Themes specific to fundraising using charity bags or clothing banks

Complaints about charity bags are particularly frequent in our casework and often relate to concerns about fundraisers ignoring 'no charity bag' signage or simply a dislike of the method. Complaints about clothing banks are less common.

There will always be some fundraising methods that are more liable to be disliked by the public, so mitigating for these complaints may not always be possible. However, responding well to requests to stop distributions and taking steps to prevent future contact may help to stop complaints from escalating.

Only a small proportion of the sample charities in part two (see page 55) use charity bags to fundraise, which suggests that this method is more often used by charities with a smaller fundraising expenditure. It is important for charities of all sizes to make sure that the third parties they contract, and any subcontractors, adequately train and monitor those distributing and collecting materials on their behalf. Charities should make sure they have sufficient oversight of both the operational processes and any complaints received, especially as the public will associate the actions and behaviours of any third parties with the charity brand.

Insufficient monitoring and complaints handling can result in non-compliance

Most of the complaints associated with methods carried out by third parties, we resolve by referring complainants back to the charity so that they can address the concerns. In the cases we do investigate, we often find that charities are failing to adequately monitor the third parties they are working with or to handle complaints effectively.

Learning from our casework

The complaint

The complainant told us that they did not want to receive charity bags that were distributed on a charity's behalf by a company. They asked us to tell the charity this, which we did. Despite this, the complainant went on to receive more bags.

Our decision

As the complainant did not have a 'no charity bags' sign, the first delivery was not unreasonable. But the charity and the company should have respected the request not to receive any further bags. We found that the company engaged in unreasonably persistent fundraising and was not compliant with the code. We also found that the charity was not compliant due to its insufficient monitoring of third parties.

The outcome

We recommended that the charity put quality measures in place to monitor the work the company carried out on its behalf, including additions to its compliance training materials and ongoing monitoring processes. We also recommended that the company reviewed its system for communicating information about 'banned addresses' to its delivery staff.



Mitigating complaints about fundraising by other third parties

Check what requirements need to be met and carry out due diligence

Charity trustees are ultimately responsible for making sure risks are adequately assessed. Trustees may need advice to understand the legal requirements and must carry out due diligence checks before entering into a third-party agreement. If there is a significant conflict of interest, both parties must consider whether it is appropriate for the relationship to continue.

Monitor for compliance with the code

Charities can monitor the third parties they work with in a variety of ways including mystery shopping, spot checks, site visits or listening in to a sample of calls. Fundraisers should consider how they can share reports on performance, learnings and improvements with the charity's senior leadership and board.

Make sure that third parties know about complaints processes

Charities must make sure that people fundraising on its behalf know where to signpost if they are asked about complaints processes. Handling a complaint well does not necessarily mean that a person will be completely satisfied, but handling it poorly will not make any issues easier to resolve.

Responding to complaints involving third party fundraising

Take responsibility for the actions of 'on behalf of' fundraisers

It's not acceptable to simply blame a third party if things have gone wrong, or expect them to deal with any concerns independently. Take proportionate action to put things right, including apologising where appropriate. Make sure any changes made to services, guidance or policy are implemented on both sides of the relationship.

Remember that trustees are still responsible

Even if a charity authorises a person or organisation to fundraise on its behalf, the trustees remain ultimately responsible for the fundraising activity. So make sure the board has sufficient oversight of complaints handling.

Involve an independent party where appropriate

Where possible make sure that complaints are investigated by someone who is independent of the events complained about. If this cannot be achieved internally, consider whether it would be appropriate to involve an independent party to investigate fairly and proportionately.

Further guidance

Chartered Institute of Fundraising
[Successful partnerships for sustainable fundraising](#)

Fundraising Regulator
[The Charities \(Protection and Social Investment\) Act 2016: Fundraising reporting requirements guidance](#)

PART 2

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

1 April 2021 –
31 March 2022

INTRODUCTION

The purpose of this part is to share information about complaints reported by a sample of the UK's largest fundraising charities.

This part 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 58).

Key findings

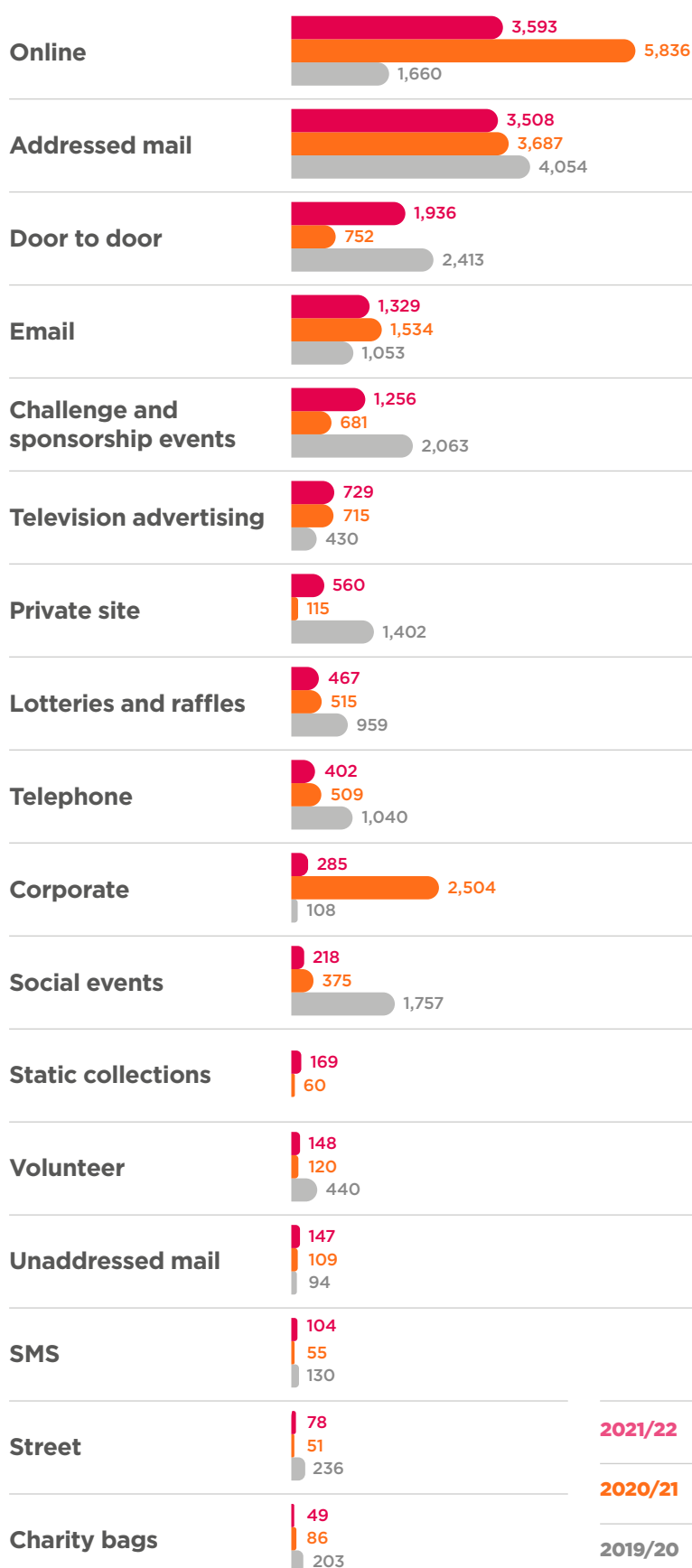
- It appears that in 2021/22 many charities resumed using in-person fundraising methods such as collections and events that were paused or restricted earlier in the pandemic. Broadly, complaint numbers have risen in line with this increased activity. However, charities have generally not yet returned to pre-pandemic activity levels. As such, this means most methods had proportionally fewer complaints in relation to activity in 2021/22 than compared to 2019/20.
- Overall, the total complaints reported by the sample charities has continued to decrease since 2019/20 to 15,104 in 2021/22. This could be for a variety of reasons including changes in activity as result of the pandemic, fewer activities being carried out which are more likely to result in complaints, or because charities are improving the way they mitigate risks and comply with the fundraising standards.
- Comparing 2020/21 to 2021/22, the charity complaints data presents a mixed picture. Complaint numbers for some methods such as addressed mail (5% decrease from 3,687 to 3,508) and television advertising (2% increase from 715 to 729) have remained broadly similar. Other methods have seen a significant change such as online fundraising (38% decrease from 5,836 to 3,593) and door to door (157% increase from 752 to 1,936).



OVERVIEW OF MOST COMMON COMPLAINT METHODS

This graph shows the number of complaints reported for the most complained about fundraising methods in 2021/22. Refer to the appendices for the full data table (see page 62).

Total reported complaints by method



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

Grouping fundraising methods together by activity type enables us to identify common trends. In the graphics below we compare the percentage change in complaint numbers between this reporting year and the previous reporting year (2021/22 and 2020/21) as well as between this year and before the pandemic (2021/22 and 2019/20) for marketing activity, collections and events.

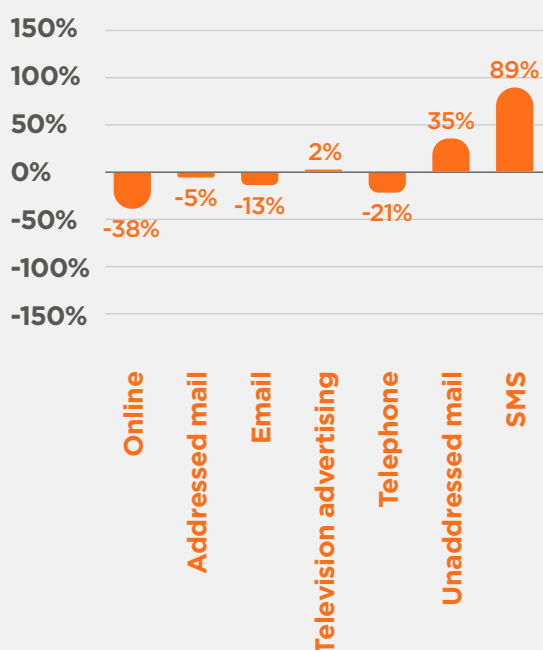
Marketing activity (direct and non-direct)

In 2021/22, online fundraising and addressed mail accounted for nearly three quarters (72%) of total complaints about direct and non-direct marketing activity. For some methods including email and online, complaints reduced compared to last year but increased compared to before the pandemic. However, most methods such as SMS, telephone, TV advertising and unaddressed mail present more of a mixed picture. This likely reflects changes in activity levels and public mood throughout the pandemic.

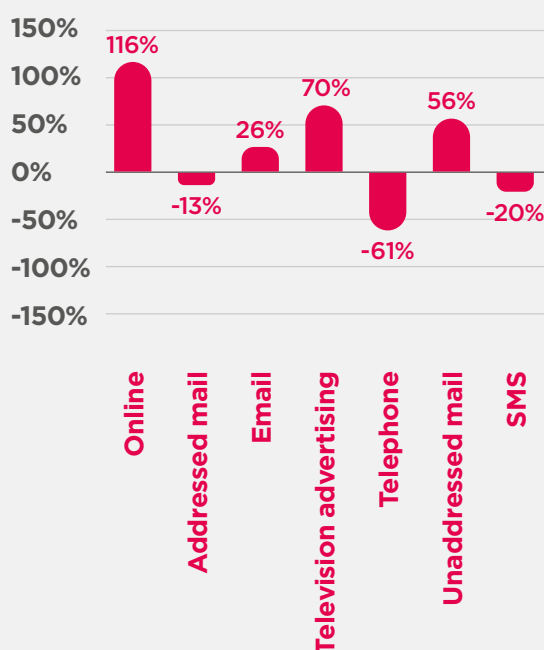
Code glossary: direct marketing

Sending (by whatever means) any advertising or marketing material which is directed to particular people.

Marketing % change 2020/21 to 2021/22



Marketing % change 2019/20 to 2021/22



Due to low numbers of reported complaints (though considered forms of marketing activity) public outdoor advertising, print media and radio advertising are not included in this analysis.

Code glossary: collection

A collection of money or sale of articles on the public highway.

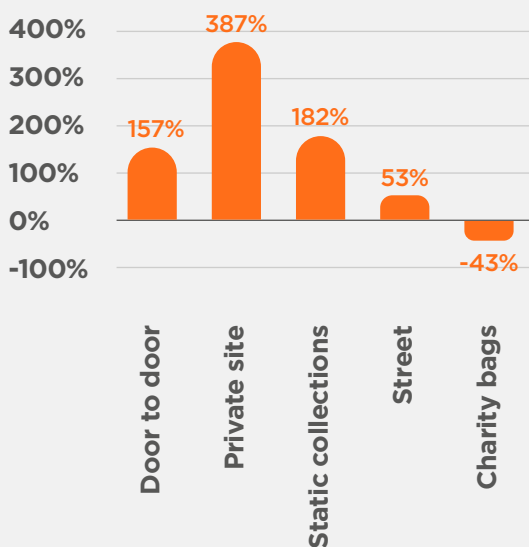
A collection of money or other property house to house (also known as door to door).

A collection of money or other property on private land.

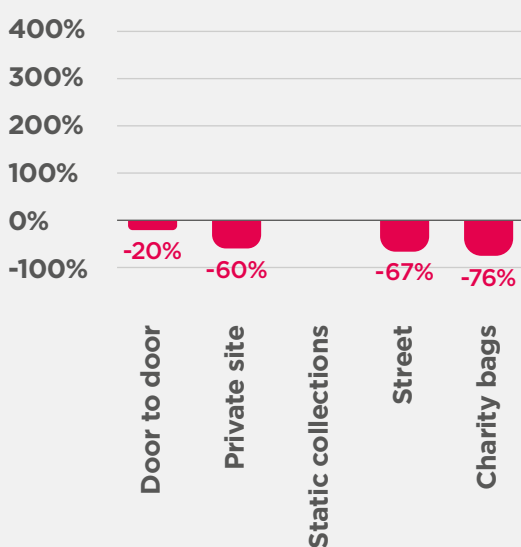
Collections

In 2021/22, door to door and private site accounted for almost 90% of total complaints about collections. For most methods complaints have increased since last year, generally in line with increases in activity levels, but are lower than in 2019/20. This could be explained by changes to pandemic restrictions on in-person activities and charities not yet carrying out the same level of activity as before. The exception is charity bags which saw a decrease in complaints both during and before the pandemic (see pages 55-56).

Collections % change 2020/21 to 2021/22



Collections % change 2019/20 to 2021/22

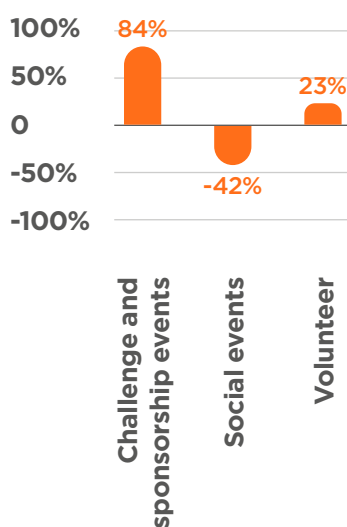


Due to changes in the fundraising method name and definition made in 2020/21, data for 'static collections' is not directly comparable with 2019/20.

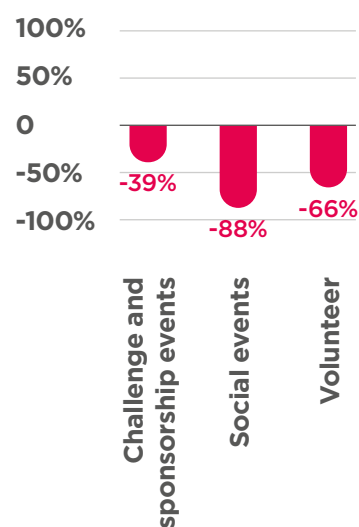
Events

In 2021/22 challenge and sponsorship events accounted for three quarters (77%) of complaints about events. Although for all methods there was a decrease in complaints overall since 2019/20, compared to 2020/21 those about challenges and volunteer led events increased. Charities have told us that operating these events has been more complex when remote or hybrid working – see pages 41 and 51 for more reasons as to why complaints were made about these methods.

**Events % change
2020/21 to 2021/22**



**Events % change
2019/20 to 2021/22**



Ratio of complaints to activity

In 2021/22 the methods that had the most complaints in proportion to the activity carried out were: corporate, street, volunteer and private site. These are the same methods as in 2020/21, with volunteer fundraising having proportionally slightly more complaints than private site compared to last year.

Method	2021/22	2020/21
Corporate	1:45	1:4
Street	1:285	1:129
Volunteer	1:361	1:564
Private site	1:665	1:450

As acknowledged in last year's report, due to the relatively low amount of activity for corporate fundraising, complaints about only a few commercial partner or participator relationships can have a significant impact on the ratio data (see page 48).

The remaining methods are generally carried out in-person. Ratios have changed slightly compared to last year, most likely due to changes in activity levels related to the pandemic. However, as street, volunteer and private site have high complaint to activity ratios year on year, this indicates these methods are likely to be of consistent concern to the public. Evidence also suggests that people commonly express a dislike of these methods.

COMPLAINTS BY FUNDRAISING METHOD AND REASON

In this section, we share more information about the reasons charities give as to why complaints have been 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 58).

Online fundraising has been the most complained about method to charities two years in a row and digital is also one of the most complained about methods to the regulator (see page 11).



Online fundraising

Online fundraising has been the most complained about method to charities two years in a row and digital is also one of the most complained about methods to the regulator (see page 11).

The number of charities using online fundraising has remained fairly consistent. However, activity levels dropped from 11 billion impressions to 8.9 billion between 2020/21 and 2021/22. This may be because charities refined their approach to digital and public use of digital channels changed during the pandemic.

The number of charities reporting complaints and volume of complaints reported have reduced compared to last year. This method is relatively low risk with one complaint for every 2.5 million impressions in 2021/22. Nevertheless, complaints have still more than doubled since 2019/20 from 1,660 to almost 3,600.

In 2021/22 the most common complaint reasons were the tone of appeal (45%) and campaign content (25%). There is a potential link to the theme of misleading information often cited in complaints to the regulator (see page 14).

Some charities explained that they also received complaints about websites and payment systems not working, or new fundraising products that were not launched effectively, as well as feedback on social media that was not necessarily about fundraising. They responded through better investment in technology or moderating comments to deliver a good supporter experience.

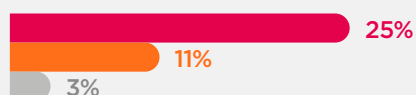
Online fundraising	2021/22	2020/21	2019/20
No and % of sample using method	54 (96%)	53 (95%)	54 (96%)
No and % of sample reporting complaints	37 (66%)	40 (71%)	29 (52%)
No of impressions	8,923,497,919	11,007,815,009	5,452,354,513
No of complaints	3,593	5,836	1,660
Ratio of complaints to impressions	1:2,483,579	1:1,886,192	1:3,284,551

Common reasons given for complaints about online (%)

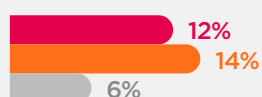
Tone of appeal



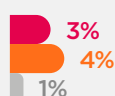
Campaign content



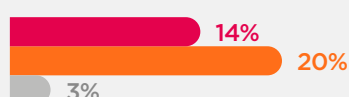
Campaign fulfilment



Dislike of method



Other complaints



Complaints about 'placement of advert' is not shown due to low volumes.

Addressed mail

Addressed mail has consistently been one of the top two most complained about methods to charities over the past two years and within the top five most complained about methods to the regulator (see page 11). This may be due to its widespread use, as all the sample charities carried out this activity.

Addressed mail has consistently been one of the top two most complained about methods to charities.

The most common reason, by far, for complaints was how frequently someone was contacted.

The total pieces sent increased by 5% in 2021/22 from 63.2 to 66.7 million but complaint numbers dropped from just under 3,700 to just over 3,500. This meant that one in around every 19,000 pieces of addressed mail resulted in a complaint, compared to 1 in 17,000 in 2020/21.

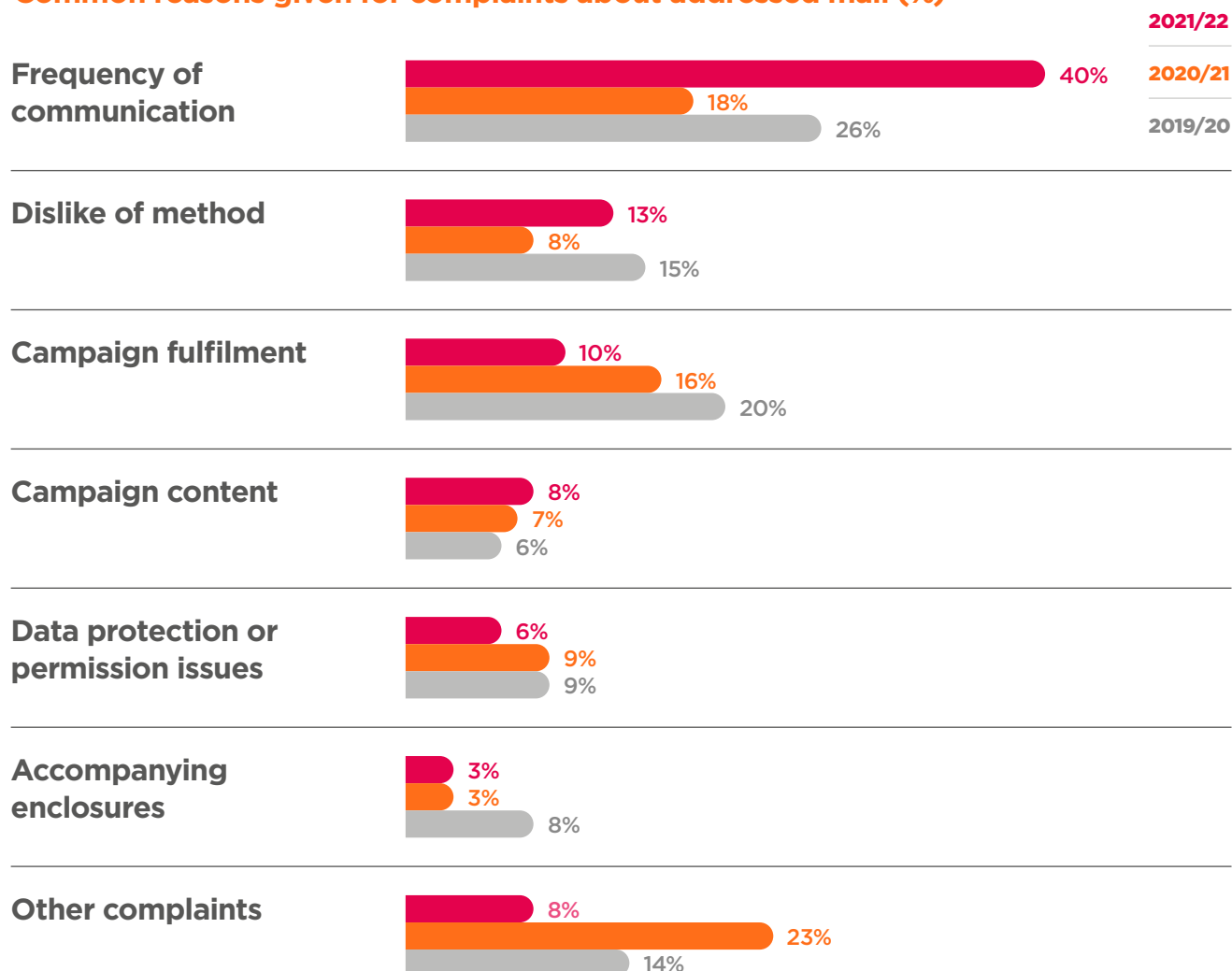
In 2021/22 by far the most common reason for complaints to charities was how frequently someone was contacted (40%) which has increased significantly compared to previous years (18% in 2020/21 and 26% in 2019/20). Repeated contact was also one of the most common reasons for complaints to the regulator about this method, as well as concerns about handling personal data.

Some charities responded to complaints by making sure that mailings were scheduled appropriately so that supporters did not receive too many in a brief time period. Others reviewed permission options for donations so that donors clearly understood the communications they would receive. The pandemic's impact on postal services also led to complaints about delays or items going missing.



Addressed mail	2021/22	2020/21	2019/20
No and % of sample using method	56 (100%)	56 (100%)	56 (100%)
No and % of sample reporting complaints	55 (98%)	53 (95%)	54 (93%)
No of pieces of addressed mail sent	66,661,819	63,200,944	70,834,507
No of complaints	3,508	3,687	4,054
Ratio of complaints to contact	1:19,003	1:17,142	1:17,473

Common reasons given for complaints about addressed mail (%)



Complaints about 'communication to deceased individual', 'poorly addressed communications' and 'tone of appeal' are not shown due to low volumes.

Door to door

Door to door has consistently been in the top five most complained about methods to charities over the past three years. The number of charities using this method returned to 2019/20 levels (from 14 in 2020/21 to 25 in 2021/22) with a nearly five-fold increase in households visited from 3.6 to 18.8 million.

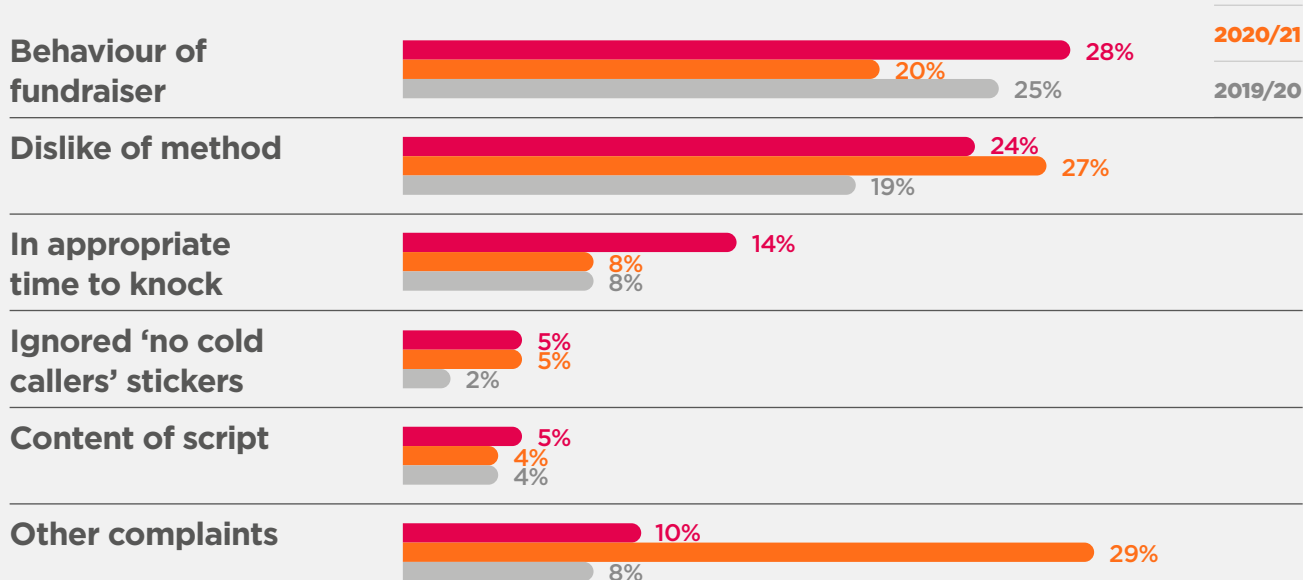
It is not surprising therefore that complaints increased by over 150% in 2021/22 (from 752 to 1,936) as activity resumed. However, around 1 in every 9,700 households visited raised a complaint compared to 1 in every 4,800 in 2020/21. This suggests that

concerns linked to the pandemic may have influenced last year's data.

Most complaints were due to fundraiser behaviour (28%) or a dislike of the method (24%). Charities said that some people questioned whether this method is legitimate or disliked visits being made too late in the evening, particularly in winter. Charities told us they responded to concerns in a variety of ways such as: thoroughly investigating any complaints, providing training to fundraisers, carrying out mystery shopping and avoiding late evening visits.

Door to door	2021/22	2020/21	2019/20
No and % of sample using method	25 (45%)	14 (25%)	25 (45%)
No and % of sample reporting complaints	24 (43%)	17 (30%)	25 (45%)
No of households visited	18,826,602	3,579,338	18,013,114
No of complaints	1,936	752	2,413
Ratio of complaints to contact	1:9,724	1:4,760	1:7,465

Common reasons given for complaints about door to door (%)



Complaints about 'appearance of fundraiser', 'campaign fulfilment', 'data protection', 'frequency of visits', 'fundraisers tone', 'ignored no cold calling zone' and 'inappropriate access to multiple occupancy residence' are not shown due to low volumes.

Email

All of the charities used email fundraising and the number of those reporting complaints has remained fairly consistent. However, complaint numbers decreased slightly between 2021/22 and 2020/21 (from 1,534 to 1,329).

Charities may be contacting their supporters more often, given the increase in emails sent from 271 million to 304 million.

Complaints about frequency of contact almost doubled in 2021/22

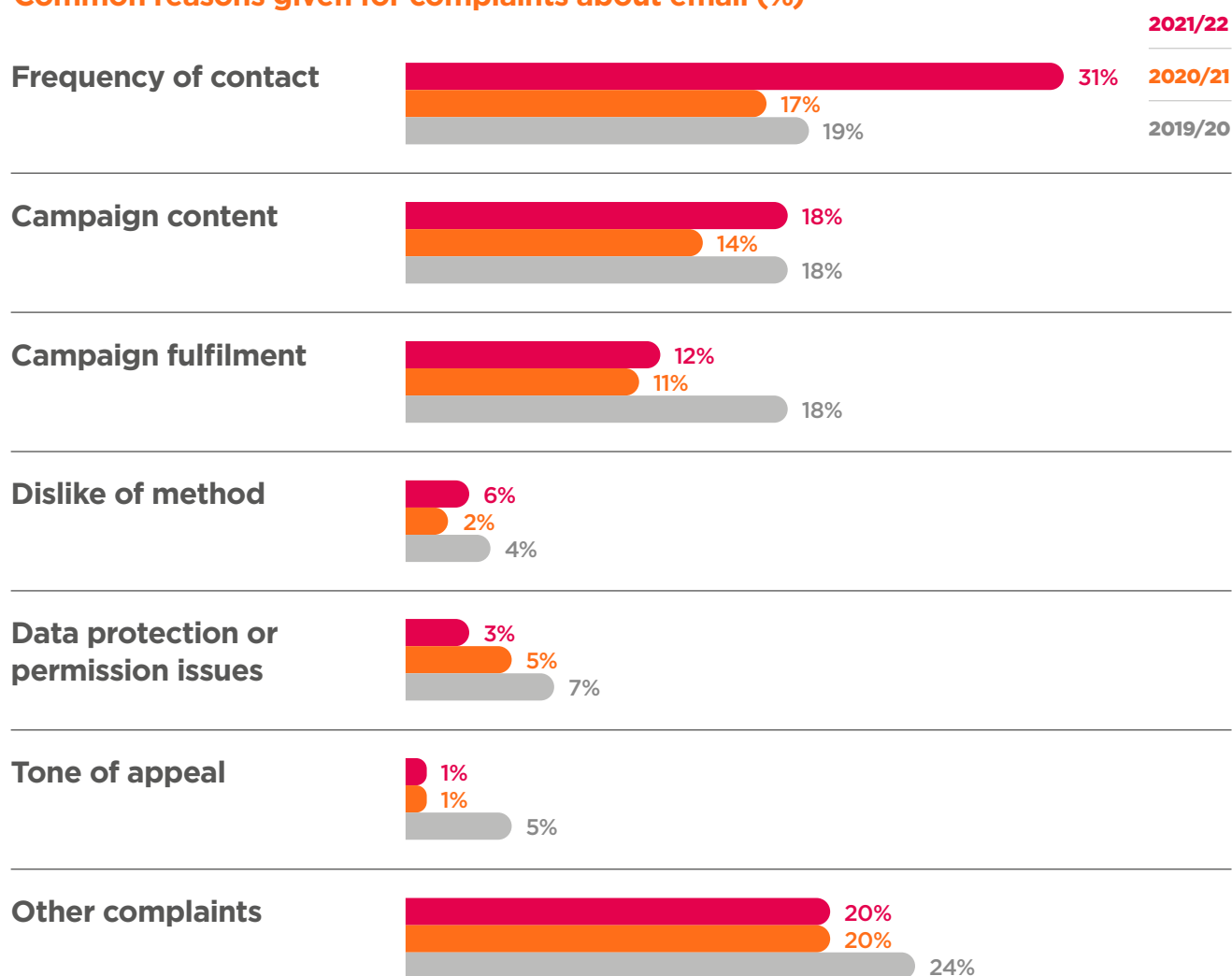
In 2021/22 the most common complaint reason was frequency of contact (31%) about twice as high as in 2020/21 (17%). It is unclear exactly why this increase has been so significant. It may suggest some charities are contacting their supporters more often, given the increase in emails sent from 271 million to 304 million.

Charities also told us that some complaints were due to occasional errors such as typos or incorrect names, emails being sent twice, or the language and tone. Some of the ways they responded were doing quality checks before sending and carefully managing the frequency of email correspondence.



Email	2021/22	2020/21	2019/20
No and % of sample using method	56 (100%)	56 (100%)	56 (100%)
No and % of sample reporting complaints	46 (82%)	46 (82%)	47 (84%)
No of emails sent	304,147,109	271,330,526	112,812,622
No of complaints	1,329	1,534	1,053
Ratio of complaints to emails sent	1:228,854	1:176,878	1:107,134

Common reasons given for complaints about email (%)



Complaints about 'communication to deceased' are not shown due to low volumes.

Challenge and sponsorship events

The number of charities using challenge and sponsorship events increased by 19% (from 43 in 2020/21 to 51 in 2021/22) however, participant levels stayed broadly the same at around 4.7 million in contrast to 6.1 million in 2019/20. Despite more charities using them, these events may not bring in as many new participants or have fewer people taking part. This might be due to pandemic-related concerns about social contact or uncertainty about whether larger events could go ahead.

Lower participant levels may be due to pandemic-related concerns about social contact or other uncertainties.

Most complaints were concerning overall delivery and execution

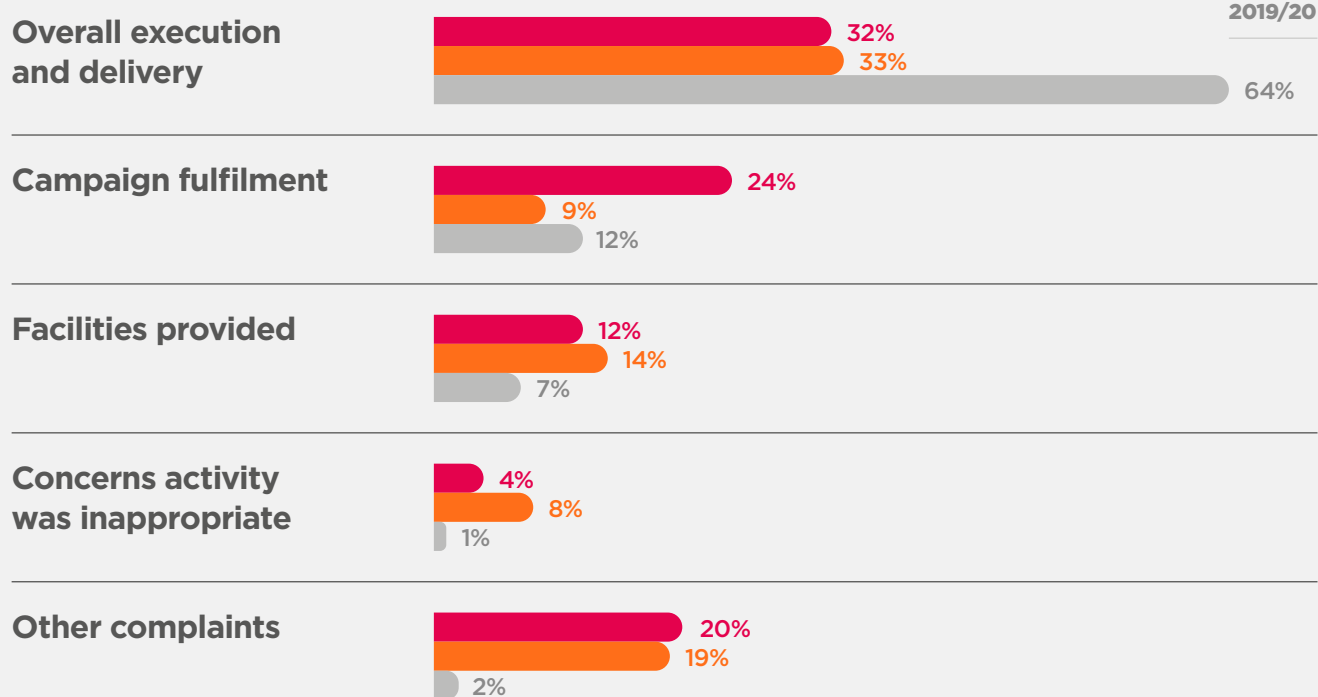
The number of charities reporting complaints increased from 23 to 29 in the same period, with complaints almost doubling from 681 to 1,256. This increase means the complaint to participant ratio has halved from 1:6,947 to 1:3,803.

In 2021/22 most complaints were about the overall execution and delivery (32%) – the same as the previous year (33%). Examples charities gave about why they received complaints included people not receiving their participant packs in time or not getting a medal or a thank you afterwards, as well as issues with the venue or how the event was run. Many charities stated that delays in handling supporter requests were due to staff working at home. Some charities responded by providing entirely digital packs or changing processes in response to new ways of working.



Challenge and sponsorship events	2021/22	2020/21	2019/20
No and % of sample using method	51 (91%)	43 (77%)	42 (75%)
No and % of sample reporting complaints	29 (52%)	23 (41%)	31 (55%)
No of event participants	4,776,169	4,730,571	6,110,249
No of complaints	1,256	681	2,063
Ratio of complaints to event participants	1:3,803	1:6,947	1:2,962

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



Complaints about 'behaviour or conduct (of event team or fundraisers)' and 'dislike of method' are not shown due to low volumes.

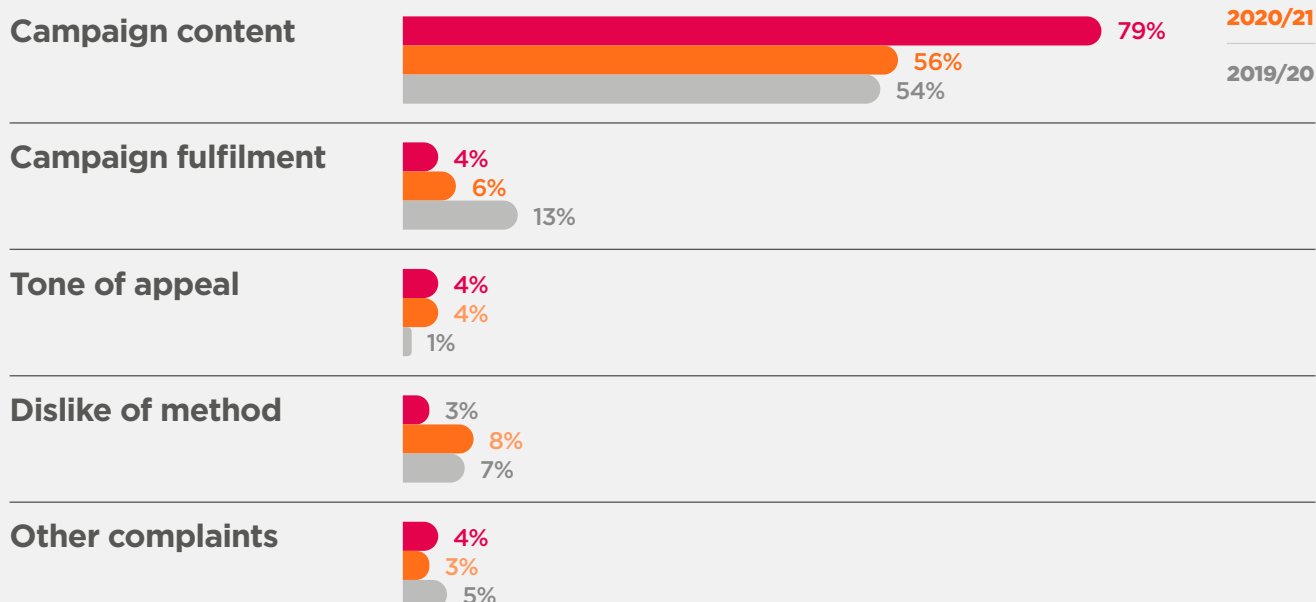
Television advertising

In 2021/22 the number of charities using TV advertising returned to 2019/20 levels but the audience reach was broadly the same as in 2020/21. The complaint to reach ratio reduced due to slight changes in audience numbers and complaints. With one complaint for an audience of around 13.9 million, this activity is relatively low risk.

As with previous years, the most common complaint reason was the campaign content (79%). Charities told us that some people said the content was graphic, not representative of the charity or not inclusive enough. Others said people might find the advert upsetting if they were personally affected by issues within it. Charities responded to complaints by keeping the content and tone under review.

Television advertising	2021/22	2020/21	2019/20
No and % of sample using method	41 (73%)	46 (82%)	41 (73%)
No and % of sample reporting complaints	32 (57%)	36 (64%)	26 (46%)
Average total audience reach per charity	248,273,183	227,003,833	140,178,886
No of complaints	729	715	430
Ratio of complaints to total audience reach	1:13,963,238	1:14,604,442	1:13,365,894

Common reasons given for complaints about television advertising (%)



Complaints about 'timing of broadcast' and 'choice of channel' are not shown due to low volumes.

In previous years we presented the total audience reach by providing the sum of reach figures provided by each charity. We have changed the table above to reflect the average reach figures instead, to reflect viewing figures based on population sizes.

Private site

The number of charities using private site fundraising increased by 10 (from 21 to 31) between 2020/21 and 2021/22 and signups also increased by over 600% (from 51,723 to 372,195). Charities returned to using this method as pandemic restrictions lifted but the number of signups remain less than in 2019/20, suggesting that fewer people may be attending these sites or that people were less receptive to this type of fundraising than before the pandemic.

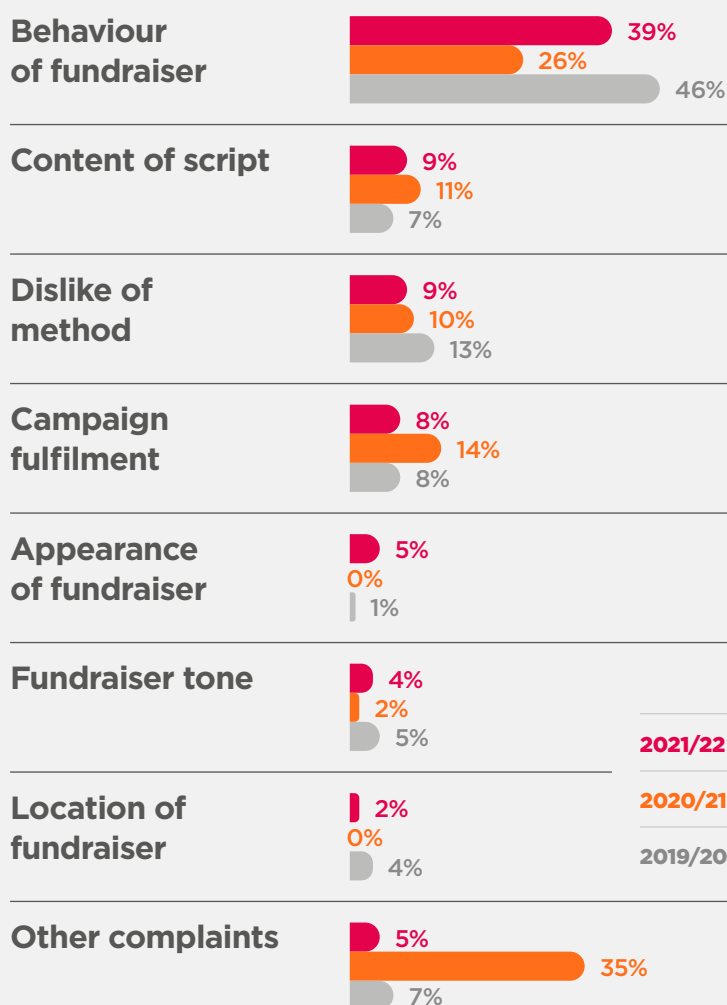
Given the increase in activity, it is not surprising to see the number of charities reporting complaints has increased (from 19 in 2020/21 to 26 in 2021/22) and complaints also increased in the same period by 387% (from 115 to 560).

As for 2020/21, most complaints related to fundraiser behaviour (39%). Charities told us that some people expressed concerns about not maintaining social distancing, or the fundraising 'script', or a dislike about being approached for donations. Charities responded by providing training and keeping scripts and complaints under review.

Complaints about 'data protection' and 'frequency of approach' are not shown due to low volumes.

Private site	2021/22	2020/21	2019/20
No and % of sample using method	31 (55%)	21 (38%)	34 (61%)
No and % of sample reporting complaints	26 (46%)	19 (34%)	32 (57%)
No of sign ups	372,195	51,723	586,397
No of complaints	560	115	1402
Ratio of complaints to sign ups	1:665	1:450	1:418

Common reasons given for complaints about private site (%)



Lotteries and raffles

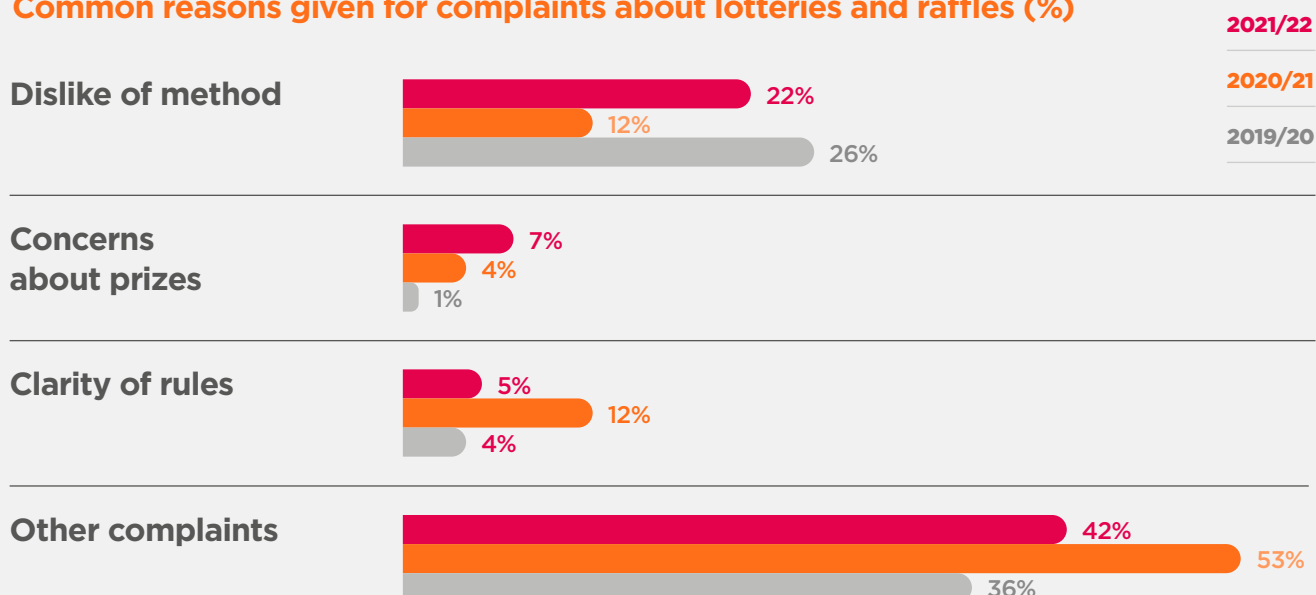
The number of charities using lotteries and raffles has increased year on year (from 33 in 2019/20 to 42 in 2021/22) and the quantity of tickets sold also increased compared to the previous year from 69.3 million in 2020/21 to 73.6 million. Despite this, the number of charities reporting complaints decreased from 36 in 2020/21 to 33 in 2021/22 and complaints also decreased from 515 to 467. This could be because

charities are becoming more familiar with this method and mitigating issues which might result in complaints.

As most complaints are for 'other' reasons, it is unclear what prompts concerns – though charities told us they were contacted about issues such as paying for tickets, the cost of postage and the environmental impact of taking part. Some responded by addressing fulfilment issues or making sure their payment technology was up to date, as well as having processes in place to record supporter preferences.

Lotteries and raffles	2021/22	2020/21	2019/20
No and % of sample using method	42 (75%)	40 (71%)	33 (59%)
No and % of sample reporting complaints	33 (59%)	36 (64%)	33 (59%)
No of tickets sold	73,636,147	69,320,978	96,438,253
No of complaints	467	515	959
Ratio of complaints to tickets sold	1:157,679	1:134,604	1:100,561

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



Complaints about 'concerns about legality', 'concerns activity is inappropriate', 'conduct of seller' and 'data protection' are not shown due to low volumes.

Telephone

Between 2020/21 and 2021/22, there was a slight decrease in the number of charities using telephone fundraising (from 46 to 45) but the number of calls made remained broadly similar year on year at around 2.2 million. Although there was a slight increase in charities reporting complaints (from 38 to 40) overall complaints decreased (from 509 to 402). As a result, the ratio of complaints reported to calls made decreased from just under one every 5,700 to one every 4,200.

There was a slight increase in the number of charities reporting complaints about phone calls.

Many people simply do not like or are especially unhappy with being called by charities.

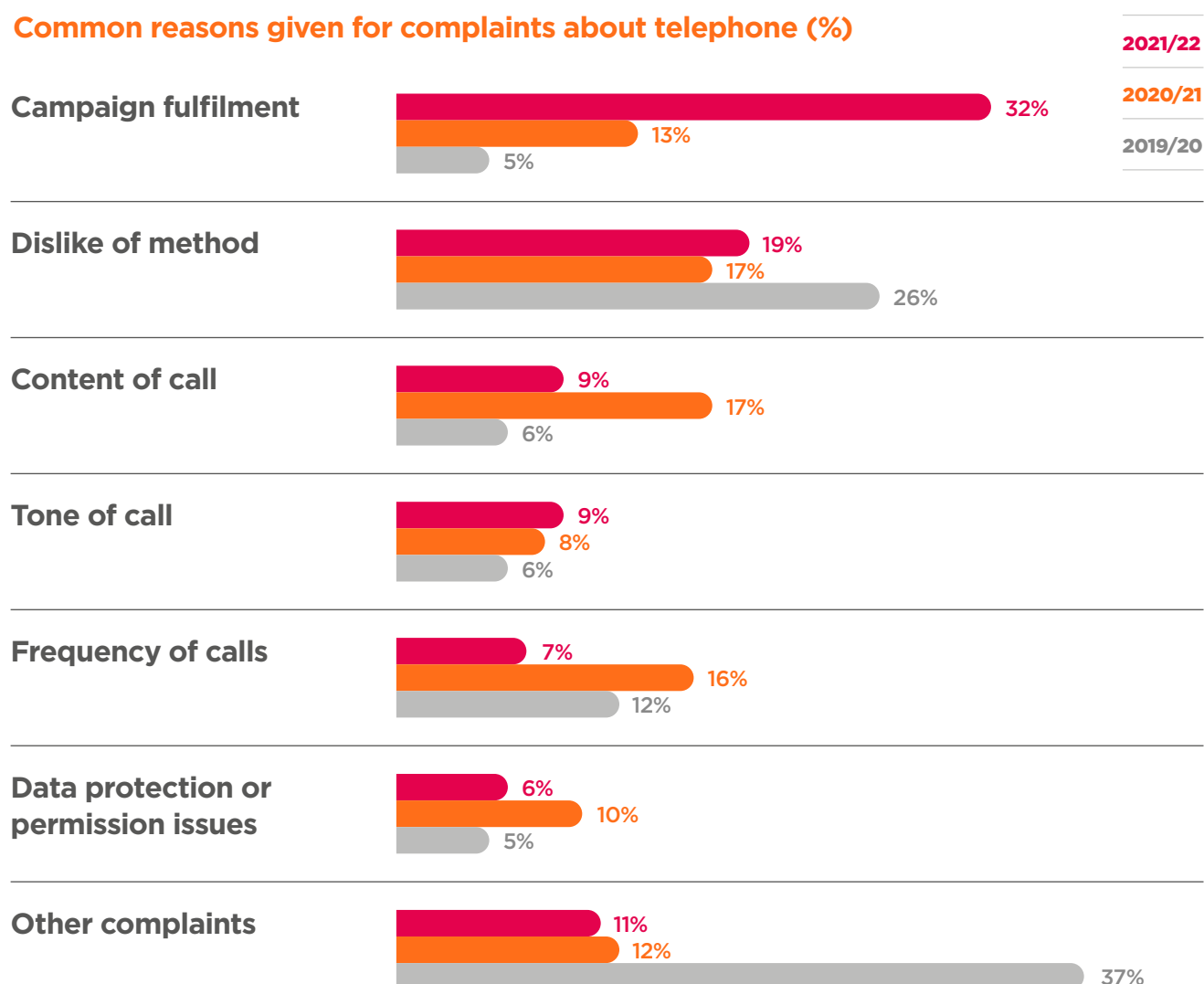
In 2021/22 campaign fulfilment was by far the most common reason for complaints (32%) whereas in the previous year it was content of the call (17%) and dislike of method (17%). By campaign fulfilment, we mean charities carrying out the actions promised to donors as part of the particular campaign. The increase in complaints for this reason are likely due to one charity which experienced delays in getting items sent to those who signed up to get a free gift when registering as a supporter.

Charities told us that many people simply do not like the method or are unhappy about being called. They responded by making sure call handlers were clear about the purpose of the call, that people were not called too frequently and that quality checks were made on calls to supporters.



Telephone	2021/22	2020/21	2019/20
No and % of sample using method	45 (80%)	46 (82%)	46 (82%)
No and % of sample reporting complaints	40 (71%)	38 (68%)	36 (64%)
No of calls made	2,286,844	2,124,924	2,228,766
No of complaints	402	509	1,040
Ratio of complaints to calls made	1:5,689	1:4,175	1:2,143

Common reasons given for complaints about telephone (%)



Complaints about 'timing of call' is not shown due to low volumes.

Corporate

Between 2020/21 and 2021/22 there was an increase in both the number of charities using corporate fundraising (from 47 to 53) and asks to businesses (from just over 10,000 to just under 13,000). However, whilst the total number of charities reporting complaints also increased (from 16 to 20) total complaint numbers reduced significantly by 89% (from 2,504 to 285).

Last year we acknowledged that the spike in complaints could be accounted for by a strong response to one charity's involvement with a company. The overall decrease this year highlights how due to the relatively low level of activity, complaints about only a few relationships can have a significant impact on data for this method.

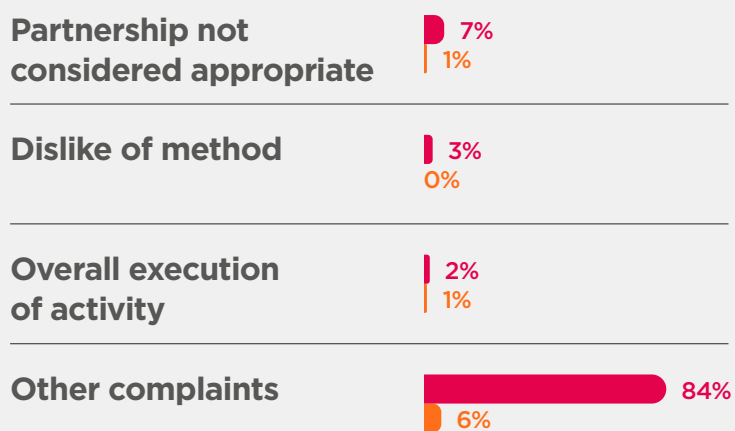
As 84% of complaints in 2021/22 were for 'other' reasons and in 2020/21 limited data was available, it is difficult to identify trends. Some reasons given included a charity refusing a donation from a company – last year by contrast the complaints were mostly about a different charity accepting a donation from a different company. As well as general concerns about suppliers failing to provide materials to support corporate partners' fundraising. Charities responded by reviewing their procedures for accepting donations and making sure appropriate processes were in place for oversight of suppliers.

Corporate	2021/22	2020/21
No and % of sample using method	53 (95%)	47 (84%)
No and % of sample reporting complaints	20 (36%)	16 (29%)
No of asks to businesses (for the purposes of fundraising)	12,936	10,110
No of complaints	285	2,504
Ratio of complaints to asks made	1:45	1:4

Common reasons given for complaints about corporate (%)

2021/22

2020/21



Complaints about 'content of approach', 'data protection', 'donation amount requested' and 'activity of partnership not considered appropriate' are not shown due to low volumes.

Social events

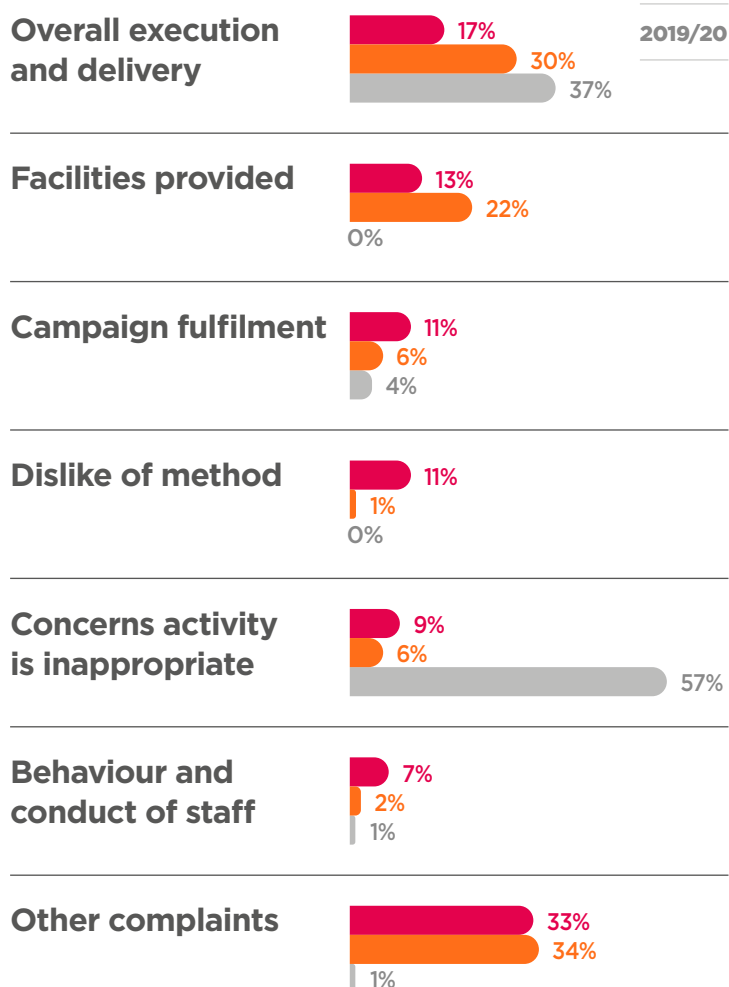
Since 2020/21, the number of charities using social events has increased from 21 to 24 but the quantity of tickets sold has decreased by 35% (from 361,700 to 232,700). This might be because people were unsure whether events would be able to take place or other pandemic-related concerns. There was also a decrease in both the number of charities reporting complaints and complaints reported, so the ratio of complaints to tickets sold is now around one in every 1,000.

Charities told us that some reasons included concerns about holding events during the pandemic and delays in supporters receiving materials to support events. Many responded by having procedures in place to make informed decisions about when to cancel or reviewing supporter packs to make sure they were mailed in time.



Social events	2021/22	2020/21	2019/21
No and % of sample using method	24 (43%)	21 (38%)	29 (52%)
No and % of sample reporting complaints	9 (16%)	12 (21%)	14 (25%)
No of tickets sold	232,661	361,715	453,210
No of complaints	218	375	1,757
Ratio of complaints to tickets sold	1:1,067	1:965	1:258

Common reasons given for complaints about social events (%)



Static collections

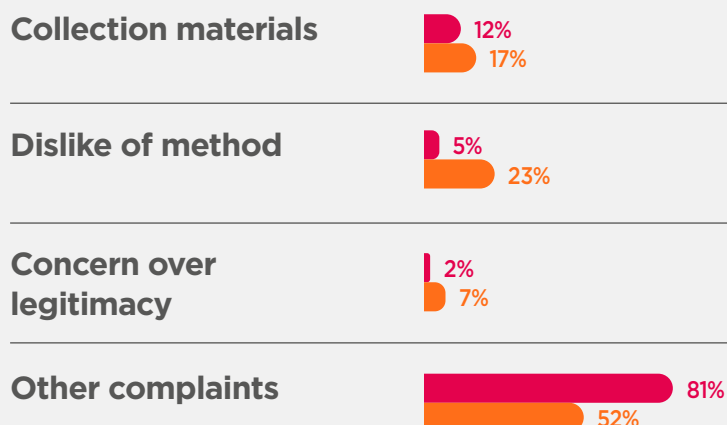
The number of charities using static collections increased from 19 to 27 between 2020/21 and 2021/22 and collection numbers also increased by 30% (from 323,900 to 421,100). This suggests that charities may be returning to some pre-pandemic fundraising activities, though as the data on social events shows (see page 49), the public may not yet be engaging with all activities at the same level.

There has also been an increase in charities reporting complaints from 6 to 10 and a significant increase in complaint numbers of 182% (from 60 to 169). As 'other' is the most frequent reason, it is unclear exactly what underpins this.



Static collections	2021/22	2020/21
No and % of sample using method	27 (48%)	19 (34%)
No and % of sample reporting complaints	10 (18%)	6 (11%)
No of static collections	421,128	323,981
No of complaints	169	60
Ratio of complaints to static collections	1:2,492	1:5,400

Common reasons given for complaints about static collections (%)



Complaints about 'no license to collect' are not shown due to low volumes.

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

Volunteer

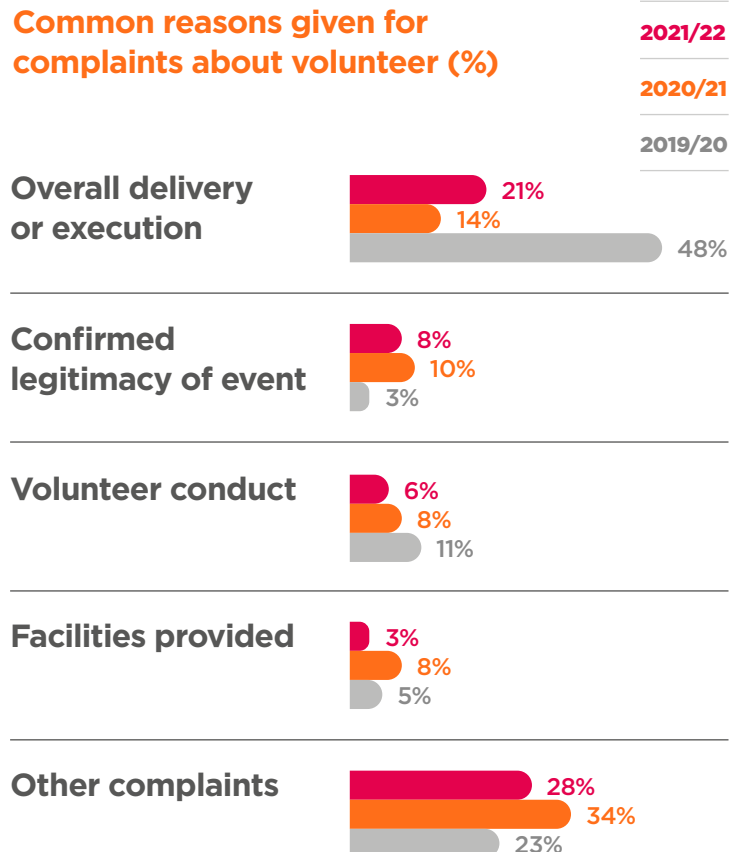
The number of charities using volunteer fundraising has returned to 2019/20 levels but the number of volunteer 'on behalf of' events fell from over 67,000 to 53,440 between 2020/21 and 2021/22. In fact, total 'on behalf of' event numbers are nearly a quarter lower than in 2019/20. This suggests that whilst charities may have resumed using these events, there may be less willingness amongst volunteers to run them.

In the same period, the number of charities reporting complaints doubled from 10 to 20 and complaints increased by 23% from 120 to 148. However, complaint numbers are about a third of those reported before the pandemic. The fall in events and rise in complaints means that in 2021/22 around one in every 360 events resulted in a complaint compared to one in every 560 the year before.



Volunteer	2021/22	2020/21	2019/20
No and % of sample using method	37 (66%)	32 (57%)	37 (66%)
No and % of sample reporting complaints	20 (36%)	10 (18%)	24 (43%)
No of 'on behalf of' events run by volunteer fundraisers	53,440	67,739	74,104
No of complaints	148	120	440
Ratio of complaints to calls made	1:361	1:564	1:168

Common reasons given for complaints about volunteer (%)



Complaints about 'concerns activity is inappropriate' and 'dislike of method' are not shown due to low volumes.

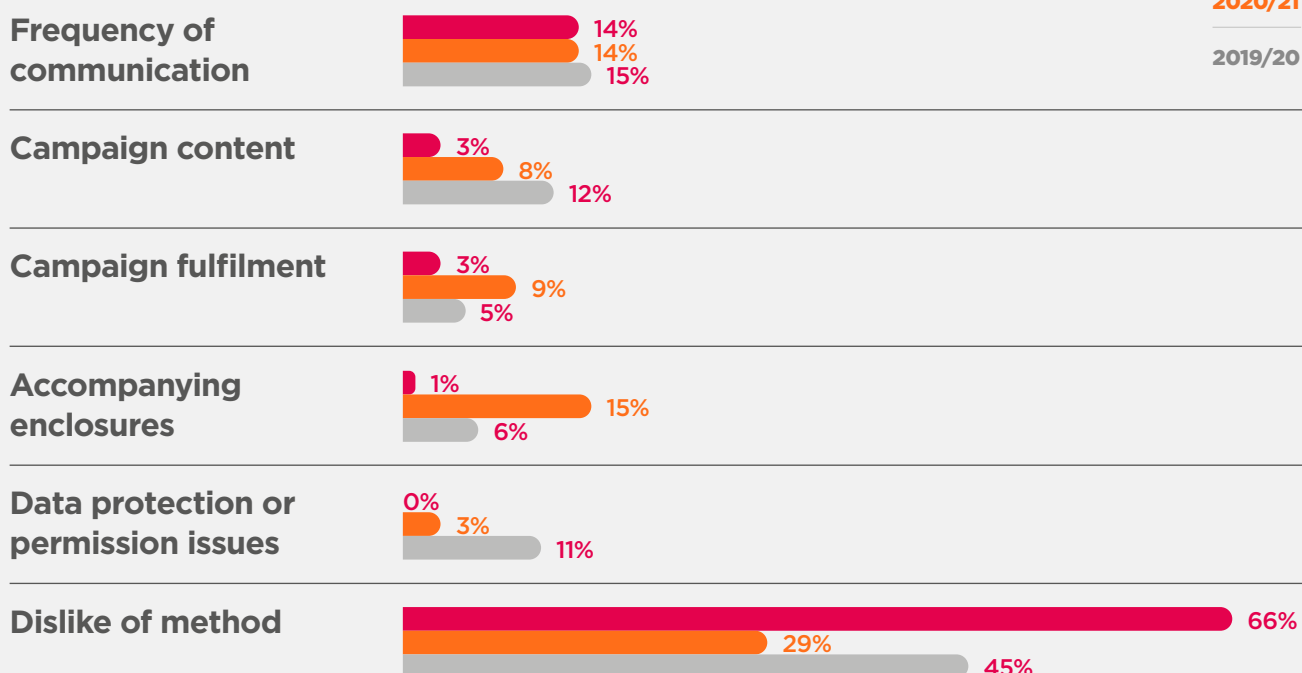
Unaddressed mail

Between 2020/21 and 2021/22 the number of charities using unaddressed mail decreased from 25 to 21 but the amount of mail sent increased by 35% (from 102 million pieces to 138 million). This suggests that charities which do use this method are doing so more often and find it an effective way to engage with potential donors.

In the same period, though the number of charities reporting complaints decreased from 17 to 13, complaints increased by 35% (from 109 to 147). Despite this, it is still relatively rare to receive complaints with around one for every 940,000 pieces sent. Consistently, dislike of the method is the most common reason for a complaint.

Unaddressed mail	2021/22	2020/21	2019/20
No and % of sample using method	21 (38%)	25 (45%)	26 (46%)
No and % of sample reporting complaints	13 (23%)	17 (30%)	17 (30%)
No of sign ups	138,199,193	102,112,739	35,454,965
No of complaints	147	109	94
Ratio of complaints to sign ups	1:940,131	1:936,814	1:377,180

Common reasons given for complaints about unaddressed mail (%)



Complaints about 'communication to deceased', 'poorly addressed communication', 'tone of appeal' and 'other complaints' are not shown due to low volumes.

SMS

Between a half to two thirds of sample charities used text messages to fundraise each year. The number of texts sent has nearly doubled since 2020/21 from 3.4 to 6.6 million and is much higher than the 2.6 million sent in 2019/20, indicating that this method is being increasingly used to reach potential donors.

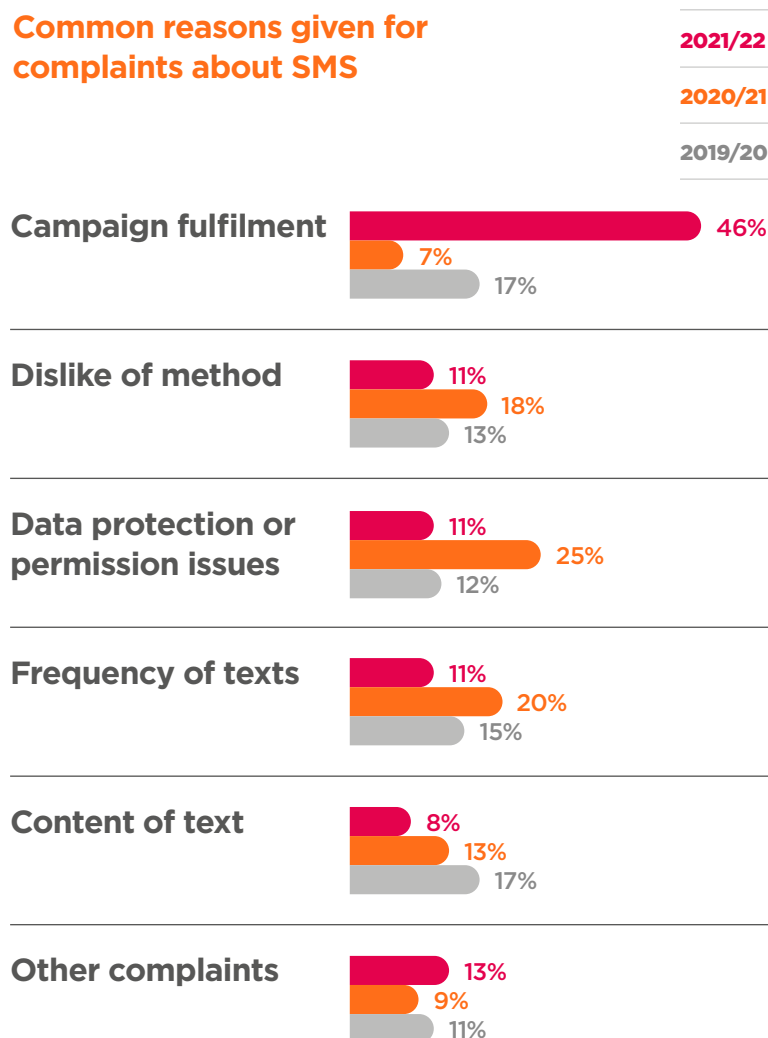
Complaint numbers have also doubled from 55 in 2020/21 to 104 in 2021/22. The ratio of complaints to texts sent remained similar between this year and last, indicating this increase was proportionate in line with increased activity. Complaint levels are also lower than in 2019/20 when far fewer messages were sent. This might be because the public is more accepting of receiving texts than in 2019/20.

The most common reason for complaints was the overall campaign fulfilment (46%) in contrast to last year when data protection issues were of primary concern (25%). Some charities said they received concerns about whether messages were legitimate and responded by reviewing content to make sure it appeared authentic. They also reviewed message frequency and made sure opt out options were clear.

Complaints about 'tone of text' is not shown due to low volumes.

SMS	2021/22	2020/21	2019/20
No and % of sample using method	33 (59%)	28 (50%)	35 (63%)
No and % of sample reporting complaints	14 (25%)	8 (14%)	13 (23%)
No of sign ups	6,569,382	3,437,547	2,561,602
No of complaints	104	55	130
Ratio of complaints to sign ups	1:63,167	1:62,501	1:19,705

Common reasons given for complaints about SMS



Street

There was a slight increase in the number of charities using street fundraising in 2021/22 compared to the previous year, but there has not yet been a return to 2019/20 activity levels. Signups increased significantly by 239% (from 6,556 in 2020/21 to 22,228 in 2021/22) but are about half those in 2019/20. This suggests that whilst some charities are using this method again, street fundraising is not yet as widespread as before the pandemic.

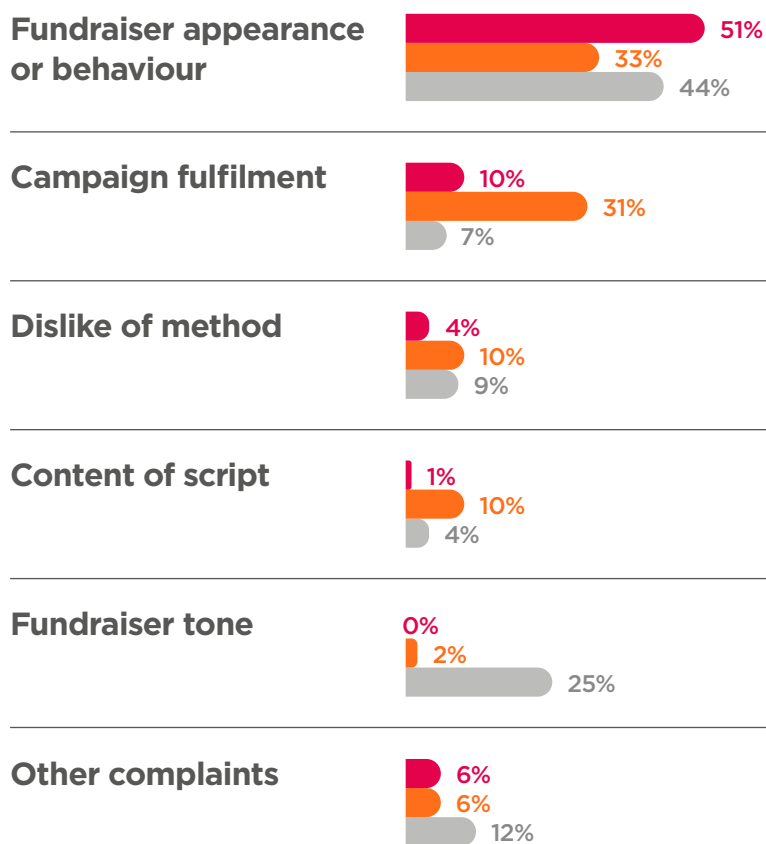
In 2021/22 complaint numbers increased compared to the previous year but the significant increase in signups means that the likelihood of receiving a complaint has decreased from one complaint for every 129 sign ups to one for every 285. The most common reason year on year is fundraiser appearance or behaviour – cited in between a third to a half of complaints.

Complaints about 'data protection', 'frequency of approach' and 'location of fundraisers' are not shown due to low volumes.



Street	2021/22	2020/21	2019/21
No and % of sample using method	8 (14%)	6 (11%)	12 (21%)
No and % of sample reporting complaints	5 (9%)	6 (11%)	13 (22%)
No of sign ups	22,228	6,556	45,582
No of complaints	78	51	236
Ratio of complaints to sign ups	1:285	1:129	1:193

Common reasons given for complaints about street (%)



Charity bags

Only a small proportion of the sample charities use charity bags. This suggests that this method is not widely used by the largest fundraising charities, though charities with a smaller fundraising expenditure than our sample may carry out this activity. In 2021/22, 2.3 million bags were distributed, about half the amount in the previous year, and nowhere near as many as the 17.9 million distributed in 2019/20.

Charity bags appear not to be widely used by larger fundraising charities.

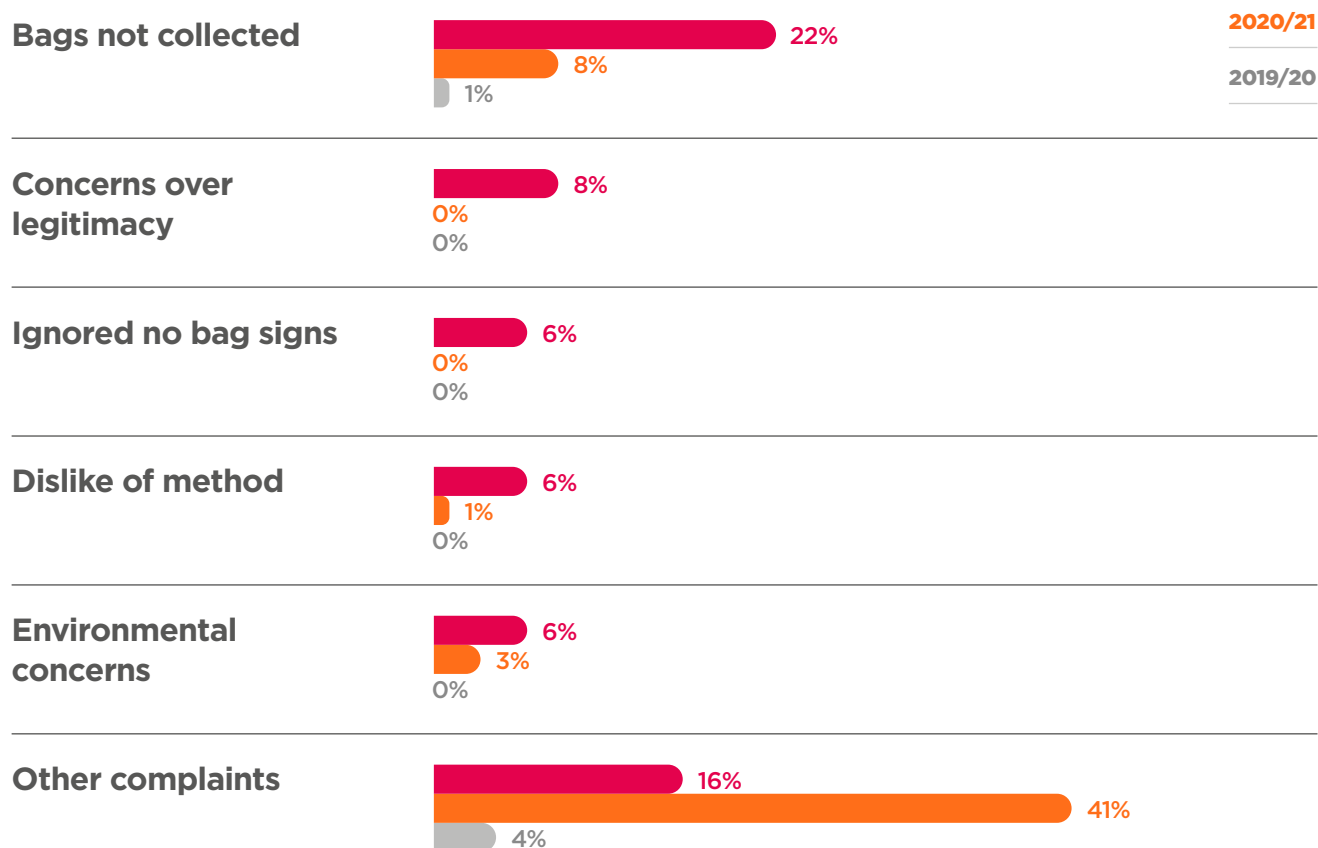
Most complaints were due to bags not being collected

The numbers of charities reporting complaints and complaints reported has dropped compared to the previous year, but complaint ratios remained broadly in proportion at 1:46,090 in 2021/22 and 1:48,577 in 2020/21. Most complaints were due to bags not being collected (22%) – in contrast to the regulator’s complaints data, where concerns were often raised about ignoring ‘no charity bag’ signage.



Charity bags	2021/22	2020/21	2019/20
No and % of sample using method	7 (13%)	6 (11%)	7 (13%)
No and % of sample reporting complaints	4 (7%)	5 (9%)	8 (14%)
No of bags distributed	2,258,429	4,177,605	17,905,686
No of complaints	49	86	203
Ratio of complaints to bags distributed	1:46,090	1:48,577	1:88,205

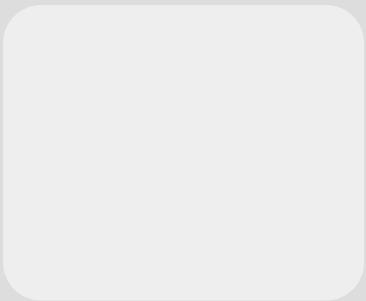
Common reasons given for complaints about charity bags (%)



Complaints about 'frequency of bag drops', 'lack of clarity or information on bag' and 'no license to collect' are not shown due to low volumes.



Appendices



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 2021 to 31 March 2022.

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 this type of activity is not regulated by us.

By within the scope of our regulatory remit, we mean those cases that are appropriate for the Fundraising Regulator to consider 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 to the case that means it is more appropriate for another organisation to consider them – such as concerns about wider governance or fraud.

Part two methodology

The sample size for part two has remained the same since the Annual Complaints Report 2017/18. These charities 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 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 60). When we refer to 'sample charities' we mean those which 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 methods which consistently received less 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%.

In 2021/22 and 2020/21 we asked charities to report volumes of activity whether they had recorded complaints against a method or not. In previous years, charities only reported activity when they had recorded a complaint against it.

Changes to data

In 2021/22 we added two additional questions to the survey: “if you can, provide information on some of the reasons why you think you received complaints about this method of fundraising” and “has your organisation changed its approach to this fundraising method as a result of these complaints and, if so, what changes have been made?”.

This change improves our understanding about why complaints were received and the actions organisations have taken in response. These questions were optional, so not all charities answered them. We have included this information where it offers additional insight and understanding into the complaints received or provides useful information that other charities can learn from.

See the Annual Complaints Report 2020/21 for information about historic changes to methodology.

Billions

Traditionally there has been a difference in the meaning of a ‘billion’ between the UK and USA. In this report, a billion is a thousand million, or one followed by nine noughts (1,000,000,000).

APPENDIX B: PART TWO SURVEY GLOSSARY

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

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

Corporate fundraising

A fundraising activity that is run in collaboration with a commercial partner and/or participator. This includes, for example, campaigns involving cause-related marketing, sponsorship deals and 'charity of the year' activities.

Door to door fundraising

Fundraisers who go door to door (also called 'house to house') between residential addresses, to known and prospective donors, with the purpose of procuring one-off cash or property or regular Direct Debit donations.

Email fundraising

A fundraising communication that is sent to existing and prospective donors via email.

Free draws and prize competitions fundraising

- Free draws: A 'gaming' based fundraising method that has a free entry route.
- Prize competitions: A 'gaming' -based fundraising method that involves an element of skill (for example, a question) for entry.

Fundraising

An ask for money or other property for charitable, benevolent, or philanthropic purposes.

Lotteries and raffles fundraising

- Lotteries: A fundraising method which involves the distribution of 'tokens' resulting in the winning token(s) being at random in an official draw. This usually involves a monetary prize.
- Raffles: A lottery in which the prizes are goods rather than money.

Major donor fundraising

A fundraising activity that involves interaction with either prospective or current major donors.

Online fundraising

A fundraising ask that is hosted on a website and is aimed at an online audience. This can include a charity's own website, advertising banners or pop-ups on third-party websites, as well as social media and online fundraising platforms.

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

Fundraisers who approach members of the public on private property (for example, supermarkets or shopping centres) with the purpose of procuring one-off cash or property, or regular Direct Debit donations.

Public outdoor advertising fundraising

A fundraising ask that is displayed in prominent outdoor locations, either on private or public land. Examples include advertisements on billboards, bus stops and public transport.

Radio advertising fundraising

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

SMS fundraising

A fundraising ask that is sent to a donor or potential donor through a mobile text message service with the purpose of procuring one-off cash or property, or regular Direct Debit donations.

Social events fundraising

A fundraising activity that has a specific 'social' focus, such as an event and possibly with ticketed entry. This could include, for example, a coffee morning or a pub quiz.

Static collections fundraising

The collection of cash from the public using collection boxes that remain in one place.

Street fundraising

Fundraisers who approach members of the public on the street with the purpose of procuring one-off cash or property, or regular Direct Debit donations.

Telephone fundraising

A fundraising ask that is made to a donor or potential donor through a telephone service with the purpose of procuring one-off cash or 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 the advertising of fundraising events.

Trust and foundation fundraising

A charitable institution applying to trusts and foundations to solicit funds in the form of grants.

Unaddressed mail fundraising

A fundraising communication that is sent through the post that is not addressed to a named individual living at the property but instead, for example, to 'the Occupier' of a property.

Volunteer fundraising

Fundraising activity that is carried out by an individual acting as an 'on behalf of' volunteer fundraiser and who are under instruction by the charity to raise funds on its behalf and in its name.

APPENDIX C: OVERVIEW DATA TABLE FOR COMPLAINTS REPORTED BY CHARITIES

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

*Fundraising method name or glossary definition changed in 2020/21.

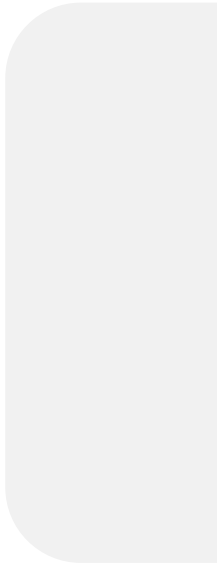
Fundraising method	Total reported complaints			Ratio complaints : activity	
	2021/22	2020/21	2019/22	2021/22	2020/21
Online	3,593	5,836	1,660	1:2,483,579	1:1,886,192
Addressed mail	3,508	3,687	4,054	1:19,003	1:17,142
Door to door	1,936	752	2,413	1:9,724	1:4,760
Email	1,329	1,534	1,053	1:228,854	1:228,854
Challenge and sponsorship events*	1,256	681	2,063	1:3,803	1:6,947
Television advertising	729	715	430	1:13,963,238	1:13,963,238
Private site	560	115	1,402	1:665	1:450
Lotteries and raffles*	467	515	959	1:157,679	1:134,604
Telephone	402	509	1,040	1:5,689	1:4,175
Corporate*	285	2,504	108	1:45	1:4
Social events*	218	375	1,757	1:1,067	1:965
Static collections*	169	60	-	1:2,492	1:2,492
Volunteer	148	120	440	1:361	1:564
Unaddressed mail	147	109	94	1:940,131	1:936,814
SMS	104	55	130	1:63,167	1:62,501
Street	78	51	236	1:285	1:129
Charity bags*	49	86	203	1:46,090	1:48,577
Free draws and price competitions*	40	43	-	1:9,867	1:97,631
Radio advertising	32	14	-	1:24,796,684	1:42,605,326
Print media*	23	9	-	1:19,376,906	1:40,192,132
Major donor	19	16	-	1:1,155	1:1,231
Public outdoor advertising*	7	4	-	1:382,511,025	1:49,453,416
Trusts and foundation	5	10	-	1:6,996	1:3,012

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 and is therefore not displayed in this table. It is not possible to directly compare 2021/22 and 2020/21 ratios against 2019/20 ratios due to changes in the way we collected activity data (see page 59).

Figures for 2020/21 for 'free draws and prize competitions' have been corrected as an error was identified in the data submission process by one charity.



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