



YOUR HOSPICE LOTTERY AND MAKE A SMILE LOTTERY CODE OF CONDUCT AND COMPLIANCE 2022

Covid-19 has had a significant impact on the way that our Lottery Fundraisers work. This conduct and compliance document includes essential safety measures that have been implemented to protect our team and the public. Every fundraiser must read and sign this documentation as well as being given Gambling Commission Training before being allowed to represent the hospices and charities we fundraise for.

- ✓ Every fundraiser must have had a valid DBS check before starting work.
- ✓ All fundraisers will always have identification on them.
- ✓ Pictures of all fundraisers will be evident on the Your Hospice Lottery and Make a Smile Lottery websites.
- ✓ Risk assessments within this document are in line with government guidance and are checked by the Head of Health and Safety at St Helena Hospice.
- ✓ The Fundraiser Procedure is in line with some of government and governing bodies' recommendations.
- ✓ Fundraising tablets are powered by Ideal Host which includes a social distancing function in which the potential lottery player can choose to confirm their play on their own device so they will not need to touch the screen. Fundraisers will use anti-bacterial wipes to ensure devices are
- ✓ When speaking with the public a minimum distance of 1 metre is required.
- ✓ Fundraisers are supported in their choice to continue to wear face coverings
- ✓ All fundraisers will continue to regularly wash hands and use hand sanitiser.
- ✓ All Lottery Fundraisers will take PCR tests when experiencing Covid-19 symptoms and should not work (amongst the public) for a minimum of 10 days after testing positive.



FACE TO FACE FUNDRAISING PROCEDURE

Public Lottery Fundraising

This procedural document is prepared for the Your Hospice Lottery (YHL) and Make a Smile Lottery (MAS) following guidance from Public Health England and the Health and Safety Executive (HSE).

This guidance is part of a series of resources produced by the Fundraising Regulator and Chartered Institute of Fundraising that aims to support charities and other fundraising organisations to be able to return to fundraising activities in a responsible way.

This guidance document is also underpinned by a COVID-19 risk assessment which must be signed by every Lottery Fundraiser.

Fundraising in public: principles and key considerations

Fundraising must be carried out responsibly and as Government restrictions are eased, the health, safety and wellbeing of the public, fundraisers and volunteers must come first. YHL and MAS Fundraising has recommenced safely, in-line with some of the Government advice. The risks associated with the activities are being regularly monitored and managed.

Keep up good sanitation practices.

Cleaning practices and hand hygiene are important in reducing the risk of transmission. Fundraisers will wash their hands as often as practically possible and use hand sanitiser frequently. Sanitiser should be used before and after touching any object.



Keep to social distancing guidance.

We will fundraise in accordance with Government guidance on social distancing and in-line with any rules from the Governments and any further conditions from local authorities and Your Hospice Lottery/Make a Smile Lottery. We are aware that this could change over time and will keep up to date with any changes and respond appropriately.

Keep a minimum distance.

You should maintain the appropriate social distance from members of the public and between yourself and other fundraisers. For example, if you knock on a person's door, you should then move at least one metre away from the door. If you have a stand in a public place, then consider having markings or materials that clearly set out the appropriate distance that people should be. Messages on clothing or signage about social distancing should also be considered.

The behaviour of the public may be difficult to predict, and if a member of the public is not maintaining social distancing then it is the responsibility of the fundraiser to act quickly and ensure a proper distance is maintained. Due to the risk of transmission, fundraisers should never shout to attract attention or during a conversation, even if they are in a loud public setting. You should also refrain from playing loud music. If the setting becomes too loud so that fundraisers are unable to have a conversation at normal speaking volume then they should not initiate or continue a conversation.

Give way to the public.

Our Fundraisers will never cause any physical obstruction to the public. If any setting does not enable the fundraiser to give way to the public and maintain social distancing throughout then fundraising will not take place in that setting.



Maintain a static position.

In normal circumstances, the code allows fundraisers to approach the public, for example by taking steps alongside them. However, this is likely to cause anxiety at the current time, so we recommend maintaining a static position in general and giving clear warning if you are going to move closer to a member of the public, while always maintaining a two-metre distance.

Review methods for exchanging items.

Limited fliers or merchandise are handed out. Fundraisers will regularly sanitize hands.

Make sure your behaviour is respectful.

You should expect that at this time some members of the public may be more anxious than usual about interacting with others. Check that an individual is happy to talk with you and be respectful about personal space while maintaining one metre distance. You should be mindful of how your interaction can affect others in a public space, so it's important to be aware of others around you and the space you are in. You can find more information on behaviours and general fundraising principles in [our guidance here](#).

Use fundraising sites responsibly.

You should observe current social distancing guidance when deciding where to fundraise at a venue. If part of a site becomes particularly crowded, for example, due to multiple queues forming, you should reposition yourself while also meeting the requirements of any Site Management Agreement that may be in place.



Limit the number of fundraisers.

- For door-to-door fundraising, no more than four fundraisers will work together at the same time and only one fundraiser at a time will approach a household.
- For private site fundraising, the number of fundraisers will be set by the terms of the relevant agreement with the site owner.

Review how we collect donor information.

We will continue to offer the social distancing application on our Ideal Host powered tablets in cases where the donor prefers to not touch the tablet. Fundraisers will use anti-bacterial wipes to regularly wipe the tablets, protecting those customers that are comfortable with confirming their play on the fundraisers tablet.

Make sure ID badges and mandatory information is accessible.

Lottery Fundraisers will always have identification badges on them. Lottery Fundraiser pictures are also apparent on the [Your Hospice](#) and [Make a Smile Lottery](#) websites

Carefully select your door-to-door fundraising territory.

When selecting territories in which to fundraise, be particularly mindful of places where there may be greater numbers of people who are vulnerable or who may be more vulnerable to the virus. No work should be carried out in a household which is isolating because one or more family members has symptoms or where an individual has been advised to shield. **Keep a knock sheet and record every door that has been approached.**



Personal Protective Equipment (PPE) and Face Coverings.

REVIEWED 07/04/2022: We continue to support fundraisers who chose to wear face coverings. All fundraisers must adhere to policies set by venues/sites when fundraising at private sites.

Co-operate effectively with third parties.

If you work with third parties, it is important that you are clear about your expectations in relation to fundraising conduct and the approach that should be taken as pandemic restriction measures are eased. All agencies that work for MAS and YHL will provide copies of their risk assessment and policies.

Listen to feedback.

We listen and reflect on feedback we receive from the public, staff, and volunteers as this will help to inform the way we carry out fundraising during this period. Activity will be continually reviewed, considering comments, complaints, and feedback.

Fundraiser, member of non-clinical staff, or volunteer - COVID-19

From 1st April you should take a lateral flow test if you develop new symptoms of Covid-19. If you test positive, you should isolate and follow the current isolation guidance. You must also notify your line manager.

There is no longer a requirement to test if you have a positive household contact unless you yourself develop symptoms.

There is no longer a requirement for PCR testing in any circumstances.

We will no longer undertake risks assessments for staff and volunteers in higher risk groups where they work in these areas.



Consider the needs of people in vulnerable circumstances or with protected characteristics.

It is inevitable that fundraisers will meet people who may be in a vulnerable circumstance or need additional support to make an informed decision. Fundraising organisations should also be mindful that during the pandemic, there are a number of people living with increased risks associated with COVID-19. You must take into account the needs of anyone who may be in vulnerable circumstances, including people who may be at higher risk from COVID-19. You should also consider the needs of those with protected characteristics, such as those who are hearing or visually impaired. Please also refer to our vulnerable people policy on how to interact with vulnerable persons.

Do not apply undue pressure to donors.

Be polite and respectful.

Be mindful of how the public may respond to your fundraising.



Title	Lottery Fundraiser Social Distancing Risk Assessment
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Assessors' Name	Kevin McGill, Health & Safety Manager Jill Moore, Lottery Manager Sarah Bumstead, National Sales Manager	Date	07/04/2022
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Description of process, activity, or task to be risk assessed	
Describe the location where the activities are taking place	Door to Door Sales Venue Sales Event Sales
Describe the activities being performed	Lottery Fundraisers selling The Your Hospice Lottery and Make a Smile Lottery face to face with members of the public at venues, events or at the potential customers door.
Describe the equipment and/or substances being used	Pop Up Banner, Marketing Stand, Sign Up Tablet, Tape Measure, marketing collateral, Hand Wash/ Sanitiser.
Describe the people involved in these activities (and others who might be affected)	Lottery Fundraisers. Potential Customers.



Identification of hazards and risk controls

Description of Hazard and hazardous event	Who might be harmed?	What risk controls are currently in place?	Current Risk Rating		
			L	C	R
Risk of COVID - positive member of public infecting staff	Fundraiser and Member of the public.	<p>1.1: Ensuring a safe 1m distance between the fundraiser and the potential customer.</p> <p>CONTROL: The fundraiser will make sure they always adhere to staying 1m away from the potential customer. The fundraiser will never enter a potential customers home at any point. The distance measured will start at the customers front door, if there isn't enough space to safely distance 1 metre the fundraiser will not proceed to make contact.</p> <p>For venues 1 metre distance will be maintained. The fundraisers will speak with venue Management to ensure they are positioned in a safe environment with being outside a preferred option.</p>	1	4	3



		<p>1.2: Always Ensure hygiene and cleanliness.</p> <p>CONTROL:</p> <p>Each fundraiser will always have hand sanitiser evident and use frequently, especially before and after knocking on a door.</p> <p>Fundraisers will use the sign-up tablet in the normal way and clean after every interaction. The Ideal Host powered tabled has a social distancing application where the potential donor can opt to confirm their play on their own device without the need to touch the tablet.</p> <p>When signing a potential player, they will speak about the charity involved instead of showing the person a laminate information sheet. The media function on the tablet will also allow the fundraiser to show the supporter digital information.</p> <p>If working in or around a venue the fundraisers will as frequently as possibly wash their hands.</p> <p>REVIEWED 07/04/2022: Whilst no longer a legal requirement, we continue to support Fundraisers who chose to wear face covering or face shields when approaching a door and working on a venue. The fundraiser will also adhere to any restrictions still in place at venues.</p>			
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		<p>1.3: Still illness</p> <p>CONTROL:</p> <p>From 1st April you should take a lateral flow test if you develop new symptoms of Covid-19. If you test positive, you should isolate and follow the current isolation guidance. You must also notify your line manager.</p> <p>There is no longer a requirement to test if you have a positive household contact unless you yourself develop symptoms.</p> <p>There is no longer a requirement for PCR testing in any circumstances.</p> <p>We will no longer undertake risks assessments for staff and volunteers in higher risk groups where they work in these areas.</p> <p>1.4: Avoiding employees working face to face/ side by side</p> <p>CONTROL: 1 metre distance from each fundraiser if they are working in pairs.</p>			
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		<p>1.5: Space Management</p> <p>CONTROL: Fundraisers to work with venue Management when positioning themselves. Try to secure a position outside and ensure there is enough space to maintain the 1m distance required. Use a tape measure to sense check the area to determine there is enough space. Move location within the venue on the agreement of venue management if the fundraiser and equipment is causing a disturbance to the flow of people traffic. Ensure the equipment is not causing a trip hazard and ensure area markings are taped to the floor at venues.</p> <p>For door to door the fundraisers will only knock-on doors where the 1m distance is applicable. They will also ensure passers-by are 1m away. If a house has insufficient space the door will not be knocked.</p> <p>1.6: Weather</p> <p>CONTROL: Fundraisers will be advised to take regular breaks if hot weather is apparent. They will be informed to regularly hydrate themselves and stick to shaded areas as much as possible if hot weather is evident. For hot weather the fundraisers will be informed to dress accordingly.</p> <p>For cold weather, heavy rain, snow, or strong winds the fundraiser will seek guidance from venue management to try to secure a safe, space compliant space within the store. For door-to-door staff within poor weather they will be asked to dress sufficiently to suit the weather. Regular breaks will be required if poor weather persists.</p>			
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		<p>1.7: Abusive Behaviour/ Shielded Potential Players</p> <p>CONTROL: If possible, when working at venues fundraisers will be asked to work in pairs keeping a safe distance as suggested earlier. The fundraiser will inform store staff and security (if evident) that they are working and are having issues with a customer if violence or abuse is evident.</p> <p>Fundraisers to politely respect people’s opinions and stop the conversation in a positive manner.</p> <p>If working door to door fundraisers to update their line manager of the area they are working in and keep in constant contact.</p> <p>Fundraisers to inform their Line Manager of abusive or threatening behaviour as soon as possible.</p>			
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Risk Rating after implementation of risk controls

Risk Rating Calculator

	Insignificant	Minor	Moderate	Major	Catastrophic
Almost Certain	5	10	15	20	25
Likely	4	8	12	16	20
Possible	3	6	9	12	15
Unlikely	2	4	6	8	10
Rare	1	2	3	4	5

Likelihood that hazardous event will occur		Consequence of hazardous event	
1	very unlikely	1	insignificant – no injury
2	unlikely	2	Minor – minor injuries needing first aid
3	fairly unlikely	3	Moderate – up to three days absence
4	likely	4	Major – more than seven days absence
5	very likely	5	Catastrophic - death

Action Level Table

Risk rating	Action
20 – 25	Consider the risk and take immediate action, what extra precautions will you put in place?
15 – 16	Take immediate action and maintain existing controls rigorously
8 – 12	Action – improve within specified timescale
3 – 6	Monitor – look to improve at next review or if there is a significant change
1 – 2	No action – no further action but ensure controls are maintained and reviewed



Vulnerable People Guidelines

It is inevitable that you will come into contact with people who may be in a vulnerable circumstance or need additional support to make an informed decision. This guidance is intended to help and support you deal with those situations.

It is important to proceed with caution with any members of the public who you suspect may be vulnerable. We must do our best to avoid signing these people up even if they have indicated that they wish to do so! But equally we must not be seen to be discriminatory or judgmental of potentially vulnerable members of the public. These guidelines will assist you in deciding whether the individual with whom you are speaking could potentially be vulnerable and therefore you should end that interaction and you shouldn't sign them up.

“Vulnerable” is defined as somebody who you suspect may not be capable of informed consent about what they are doing - i.e.: they don't completely understand what they are signing up to do or what happens next. The most common types of vulnerability in this context are:

- Physical and mental medical conditions, disabilities, and difficulties (both permanent and temporary, including learning difficulties)
- Age
- Stress and anxiety
- Poor grasp of English
- Under the influence of alcohol or drugs.

If you believe that an individual may be in a vulnerable circumstance or unable to make an informed decision, then you should end that interaction



How you can identify someone who may be vulnerable;

- Asking irrelevant and unrelated questions.
- Responding in an irrational way to simple questions.
- Asking for information to be continually repeated or continually asking the same questions.
- Obviously not understanding what you are saying and changing the subject of what you are discussing
- Taking a long time or displaying difficulty in responding to simple questions or requests for information.
- Displaying signs of forgetfulness.
- Indicating that they are currently stressed or in difficult times (e.g.: because of job loss, bereavement, ill child or parent, having to act as a carer for a child, parent or relation)
- Indicating lack of affordability to maintain the donation for any of the same reasons
- Giving a statement such as 'I don't usually do things like this, my husband/wife/son/daughter takes care of it for me'.
- Saying that they are not feeling well or not in the mood to continue.
- Indicating in any way that they are feeling rushed, flustered, or stressed
- Unable to read or understand the information you are giving to them
- Displaying signs of ill-health such as breathlessness or looking exasperated or discontented.
- Indicating that they are not financially capable of making and maintaining the donation, e.g.: they say that they never have any spare money and can barely afford to pay their bills or rent, they are in debt, they take lots of loans

Age does not necessarily mean that an elderly person is vulnerable. But please be aware of the above indicators when engaging with an elderly person in order to judge whether s/he is potentially vulnerable.



How you should engage with someone you suspect may be vulnerable

It is important to always clearly explain the reason you stopping and engaging with any person you speak to whilst you are fundraising. If you suspect, once your engagement with that person has started, that the person may be vulnerable then please take extra care and do the following:

- Explain as clearly as possible the reason for you stopping that person
- Ensure your ID is clearly on show (photo facing out) and hold it out for the person to see.
- Talk in clear language, avoiding words and phrases that may be hard to understand (but avoid shouting).
- Repeat information.
- Be patient and do not rush.
- Repeatedly check the person is happy to continue.
- Ask if they would like to talk to anybody else before making a decision.
- Check their understanding at relevant parts of the engagement
- Ask if there is anything that needs further explanation



How to end a conversation with someone who you feel might be vulnerable

If you believe that the person with whom you are engaging is not capable of informed consent to make and maintain the donation, then you should end that engagement. But this must be done politely and courteously.

A polite way to end the engagement is to say, “I’ve taken up enough of your time today, thanks for listening”, or “Maybe you need some more time to consider whether you’d like to support <the charity/the hospice>.”

- If the individual is keen to donate but you have identified them as a potentially vulnerable person, explain to them the direct methods to do so via the charity website and main telephone number.
- If, at any stage during or after the engagement, you suspect the person has been alarmed, distressed or confused by your conversation, contact your Manager and report the incident.