

**EMBARGOED TO 00:01, 20 JANUARY 2016**

Fundraising Standards Board

**FRSB Investigation  
into Charity  
Fundraising  
Practices instigated  
by Mrs Olive  
Cooke's case**

20 January 2016



## **ABOUT THE FRSB**

The Fundraising Standards Board is the self-regulatory body for charity fundraising in the UK. It regulates charity fundraising against the standards set by the Institute of Fundraising (the Code of Fundraising Practice). The FRSB's near 2,000 charity fundraising members collectively account for 60% of voluntary income raised in the UK. The FRSB runs a three-stage complaints process, publishing the outcome of adjudications and investigations at [www.frsb.org.uk](http://www.frsb.org.uk).

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## **FOREWORD**

Since last summer, charity fundraising practices have been under intense scrutiny after nationwide newspaper headlines reported the tragic death of Olive Cooke and allegations that she was ‘hounded’ by approaches from charities. A series of further media exposés in the weeks following Mrs Cooke’s death identified unacceptable fundraising practices being carried out by some fundraising agencies and well known UK charities.

While Mrs Cooke’s family believe that charities were not responsible for her death, they have confirmed to the FRSB that she was upset by the large number of fundraising approaches she received; particularly through the post.

Mrs Cooke was a kind and generous person who had a long history of supporting the Royal British Legion’s annual ‘Poppy Appeal’ and who was also often willing to respond and give financial support to many of the other charities that approached her.

Her experience is a sad but extremely important case as it sheds light on the way in which fundraising activity could escalate and leave a committed donor feeling under pressure to give.

Mrs Cooke’s experience demonstrates the inevitable consequences of a fundraising regime where charities have been willing to exchange or sell the personal details of donors to each other, and to commercial third parties. This created a situation where a donor to a number of charities could find themselves, after a period of time, receiving mail packs and phone calls from an ever-growing, and almost uncontrollable, number of charities.

At the same time, it must be acknowledged that individual charities had no way of knowing the cumulative impact of their practices or how many other organisations might be approaching Mrs Cooke at any one time. However, one might question whether more consideration could have been given by charities to the potential consequences of sharing her details so extensively and indeed how charities can prevent this from happening in the future.

According to evidence supplied by charities contributing to our investigation, from the year 2000 to 2014 the number of charities contacting Mrs Cooke regularly to ask for donations more than trebled and, at its peak, she received over 460 mailings per annum from the charities in our sample - equivalent to eight or nine a week. An interview which Mrs Cooke gave to the Bristol Post six months before she died suggests that the number of mailings analysed in our sample represents only around one-sixth of the number of fundraising requests she was actually receiving in total.

But she was not alone. Mrs Cooke’s experiences were echoed in the hundreds of complaints that the FRSB received after the publicity of her death. While most individual charities did not send out excessive quantities of mail, the collective impact of mass market mailings and data sharing, with inadequate opportunities for the recipient to opt out, has meant that many other donors reported being inundated with requests from charities and feeling under pressure to give. This, together with other poor fundraising practices exposed since Mrs Cooke’s death, underlines why the fundamental reform to charity fundraising that the FRSB called for in our ‘Interim Report’ is now being implemented.

At the FRSB, we welcome the positive steps that have already been taken to raise standards, with the Institute of Fundraising's Code of Fundraising Practice now providing greater clarity so that charities must make it easier for supporters to opt in and opt out of donor communications and forthcoming changes which will include banning data sharing without express consent.

But successful fundraising reform will not be achieved by the introduction of greater sanctions and a new regulatory framework alone. There must also be a genuine commitment amongst all fundraising practitioners as well as charity chief executives and trustees to show greater respect to the public, and to ensure that every fundraising experience is a positive one - reflecting donors' critical role in funding vital charitable services in the UK and overseas.

The relationship between a charity and its donors has to be cherished and donors must be placed firmly at the heart of fundraising in the future.

**Andrew Hind, Chair of the Fundraising Standards Board**

## STATEMENT TO THE FRSB FROM MRS COOKE'S FAMILY

Mr McLean  
Chief Executive of the Fundraising Standards Board

We are very grateful that there has been an investigation into charity fundraising practice overseen by the Fundraising Standards Board and are pleased that there have been changes to the Code of Practice as to how charities fundraise, as well as changes to the law to prevent elderly and vulnerable people feeling pressurised to give when they can't.

We want Olive to be remembered for her incredibly kind, generous and charitable nature. Far from being a victim, she was a strong believer in the importance of charities in UK society and local communities. She found great comfort in the knowledge that her support could help someone else live a better life.

At the same time, she was concerned about the amount of letters and contact that she was receiving from charities and we are sure she would have been very upset to know that her details were being shared or sold by some charities who she had agreed to support. We are also pleased that a Fundraising Preference Service is going to be developed as this will mean that vulnerable people can put a stop to fundraising approaches in the future if they want to.

On Olive's behalf we can't thank you and your colleagues enough for your help and we now know something will become of this sadness.

## **EXECUTIVE SUMMARY**

Following media reports of the tragic death of Olive Cooke in May 2015, the Fundraising Standards Board (FRSB) was asked by Government to investigate<sup>1</sup> charity fundraising amid claims that Mrs Cooke had been overwhelmed by approaches from charities.

On 18 May 2015, the FRSB launched a two-strand investigation addressing:

- The particular circumstances that led to Mrs Cooke feeling overwhelmed by contact from charities; and
- The charity fundraising practices that led to a spate of public complaints received by the FRSB in the weeks that followed Mrs Cooke's death.

This investigation report reviews the evidence provided by a total of 1,442 FRSB member charities and 30 other non-member charities known to be mailing Mrs Cooke. The report provides a valuable insight into the proportion of these charities which held Mrs Cooke's details, how those details had been acquired and how frequently the charities concerned were mailing her.

However, it is known from an interview given by Mrs Cooke to the Bristol Post on 30 October 2014 that she was also receiving mailings from a large number of other charities. The FRSB has had no way of identifying these other charities or of accurately quantifying the volume of contact they were also having with Mrs Cooke.

Our findings in respect of the second strand of the investigation were published in an Interim Report in June 2015 and reflect the many issues that confronted both Mrs Cooke and the wider public. The FRSB made 17 recommendations for changes to the Institute of Fundraising's national fundraising standards [http://www.frsb.org.uk/wp-content/uploads/2015/06/FRSB-Interim-investigation-report\\_Published-9June2015.pdf](http://www.frsb.org.uk/wp-content/uploads/2015/06/FRSB-Interim-investigation-report_Published-9June2015.pdf).

### **Mrs Cooke was a generous supporter of many causes**

Information contained in charity responses to the FRSB's survey requesting information on their relationship with Mrs Cooke confirmed what was already known about her: that she was a generous supporter of many causes.

- 99 charities from our sample possessed her details;
- Mrs Cooke had donated to at least 88 of these charities in her lifetime; and
- She had been a regular donor to 48 of these charities – more than half (55%) of those she supported.

### **Mrs Cooke received an ever-increasing volume of charity mail**

As well as receiving mailings from charities she was supporting, Mrs Cooke's generosity led to her receiving an increasing number of fundraising requests from new charities with which

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<sup>1</sup> The terms of reference for the investigation are at: [www.frsb.org.uk/terms-of-reference-published-for-olive-cooke-investigation/](http://www.frsb.org.uk/terms-of-reference-published-for-olive-cooke-investigation/)



she had not had any previous contact. This was due to the fact that her personal contact details had been shared by a number of those charities.

- Between the years 2000 and 2014, the number of mailings that she annually received from the charities in our sample increased from 119 to 466\*. This corresponds with the growing number of charities she chose to support.

Mrs Cooke's family have indicated that the cumulative impact of the number of organisations mailing her led to her feeling distressed and overwhelmed.

In 2014, the year before her death, we estimate that she received an annual equivalent of at least 460 mailings, or almost nine every week, from the charities in our sample.

The FRSB's analysis relates only to a sample of 99 charities. In an interview conducted with the Bristol Post on 30 October 2014, Mrs Cooke confirmed that she usually received around six mailings from charities every day, and as Christmas approached she was receiving eight to ten every day, with a total of 267 charity mailings in one month.

The peak of 466 mailings in one year referred to in this report, on the basis of the charities in our sample, is therefore likely to represent only about one-sixth of the total mailings from charities that Mrs Cooke was actually receiving.

### **Charities shared Mrs Cooke's details without her express permission**

While the level of contact by each individual charity seems reasonable (averaging at under six mailings per year), some responsibility for the volume of communication must be taken by those charities which had, over the years, passed on Mrs Cooke's contact details either to other charities or commercial list brokers without seeking her clear permission to do so.

- While the majority of charities that possessed Mrs Cooke's details did not share her contact information, 24 out of the 99 charities with her details on file had passed them on to others.
- 21 of these confirmed they had permission to share her details but in virtually all cases this permission was 'assumed' and based on the fact that Mrs Cooke had not proactively opted out of data sharing.
- The default position of most charities was that the onus was on Mrs Cooke, the donor, to initiate an opt-out of data sharing, often without clear guidance on how to do it.
- While most charities had not themselves shared Mrs Cooke's personal data with others, 70 of the 99 charities had obtained Mrs Cooke's personal details from a third party (such as a fellow charity or commercial list supplier).

### **Charities gave insufficient opportunities for opting out of future contact**

Charities offered limited opt out opportunities for Mrs Cooke to remove her contact details from future mailings:

- 16 of the 99 charities failed to provide Mrs Cooke with any opportunity to opt out of further communications;

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\*The average number of mailings was calculated based on the number of charities that had contacted her multiplied by the number of mailings per year that each charity said they sent to her.

- 56 charities required Mrs Cooke to proactively contact them if she wished to opt out; and
- Only 14 charities were consistently providing an opt out 'tick box' to allow Mrs Cooke to easily stop receiving mailings.

### **Changes to Fundraising Standards**

Following the news surrounding Mrs Cooke's death and complaints received by the FRSB in the weeks that followed, the FRSB published an interim report setting out the most common public concerns about fundraising and issuing 17 recommendations for changes to the Code of Fundraising Practice.

The Institute of Fundraising has accepted the vast majority of these and made the following principal changes to its Code of Practice:

- Amending the wording of all required actions from 'OUGHT' to 'MUST';
- Providing greater clarity on the requirements of the Data Protection Act and the Privacy and Electronic Communications Regulations as enforced by the Information Commissioner's Office;
- Introducing the requirement for all addressed communications to include the ability for the public to opt out of future contact from the charity and for it to be clearly presented and simply worded;
- Requiring all charities and their fundraising agencies to end a fundraising call when asked and stipulating that calls must be made from an identifiable number that can be checked or reported; and
- Removing the term 'reasonable persuasion' from the Code and replacing it with clearer definitions that prohibit unreasonably intrusive behaviour that places undue pressure on a person to donate.
- In addition, a forthcoming change will make it a requirement for charities to obtain express permission before sharing a donor's personal data.

### **A behavioural shift is now required for the way in which charities view their supporters**

There needs to be a behavioural shift across the voluntary sector in the way that charities view their supporters.

The FRSB believes that the spirit of the Fundraising Promise - to which all FRSB members commit - should have a more central role in shaping the relationship between every charity and its donors. A full version of the Fundraising Promise can be found in Appendix III of the report.

Of the six principles in the Fundraising Promise we feel one is particularly relevant to this sad case:

## **“WE ARE RESPECTFUL**

- We respect the rights, dignities and privacy of our supporters and beneficiaries. We will not put undue pressure on you to make a gift and if you do not want to give or wish to cease giving, we will respect your decision. If you tell us that you don't want us to contact you in a particular way we will not do so.”

Trustees must actively engage with their charity's fundraising activities to ensure that generating income is not placed above respect for their donors and the wider public.

### **Looking to the future**

The FRSB believes that if charities fully comply with the newly strengthened Code of Practice and reposition donors at the heart of their fundraising activities this will go a long way towards ensuring that donors in the future will not be placed under the same pressures as those confronting Mrs Cooke.

Nevertheless, there needs to be an easier way for individuals to control how they are approached by charities and greater organisational commitment to meeting donors' needs and listening to their concerns. We therefore support the principle of the proposed Fundraising Preference Service (FPS) although it will be for the new Fundraising Regulator to identify an effective way for this system to be implemented.

## **METHODOLOGY**

The FRSB collated and assessed evidence provided by Mrs Cooke's family during the summer of 2015 and reviewed all charity fundraising complaints made to the FRSB between 15 May and 3 June of that year.

Mrs Cooke's family advised the FRSB that the high number of fundraising appeals that Mrs Cooke received in the post was what had caused her most distress. The FRSB's investigation therefore focused primarily on the charity mailings she received and the sharing of her contact details.

The FRSB approached all of its fundraising charity members and 30 other charities that were known to have contacted Mrs Cooke, seeking their cooperation with the investigation, by responding to a series of questions (see Appendix II) about their fundraising contact with her. A total of 1,442 fundraising organisations responded to this call for evidence.

This report provides an analysis of both that evidence as well as information supplied by Mrs Cooke's family.

## **PART A: INVESTIGATION INTO CHARITY CONTACTS WITH MRS OLIVE COOKE**

### **1. Key findings**

In addition to being a long-term volunteer poppy seller for the Royal British Legion, Mrs Cooke was also a generous supporter of charities, and our investigation confirms that she gave to at least 88 separate charities in her lifetime. The FRSB has identified that the large number of mailings she received was mainly due to:

- The large number of charities that she supported in her lifetime;
- The extent to which her details were passed on to other charities and commercial list agencies; as well as
- Insufficiently clear opportunities for her to opt-out of future contact from charities.

Most of the charities involved in this investigation did not contact Mrs Cooke excessively by direct mail - the average being 5.8 times a year, i.e. roughly once every two months; some of these letters are likely to have been general correspondence or newsletters, rather than donation requests. As such, it was the collective, cumulative experience of being approached by so many organisations that was one of the most significant factors in leading to Mrs Cooke feeling overwhelmed.

- Of the 1,442 charities that contributed to the FRSB's investigation, 99 confirmed that they had Mrs Cooke's details on their database with 32 of the 99 charities contacting her for the first time within the last five years.
- Mrs Cooke supported a total of 88 of these charities over the years; at varying stages, she was a regular donor to 48 organisations (55%), a sporadic donor to 24 and a one-off donor to 16.
- Before the year 2000, we estimate that Mrs Cooke was being mailed by 19 of the charities in our sample. Over the past five years, this rose to over 70.
- Typically, from the 99 charities in our sample, Mrs Cooke would receive up to nine addressed charity letters in a week, with each charity sending her an average of just under six mailings per year. This amounted to a peak of over 460 mail items in 2014.
- 24 charities (one quarter of those with Mrs Cooke's details on their records) had shared her details with other organisations.
- 17 of the 99 charities did not know from where they had sourced Mrs Cooke's details. Of those that did know, 70 charities (85%) reported that her details were secured via a third party: 29 sourced her details from a list purchased from a fellow charity, 27 from a list broker and 14 by exchanging contact data with fellow charities.

It is known from an interview that Mrs Cooke gave to the Bristol Post on 30 October 2014 that she was also receiving a large number of additional fundraising approaches from charities which were not included in this investigation sample. The peak of 466 mailings in one year referred to in this report, on the basis of the charities in our sample, is therefore likely to represent only about one-sixth of the total mailings from charities that Mrs Cooke was actually receiving.

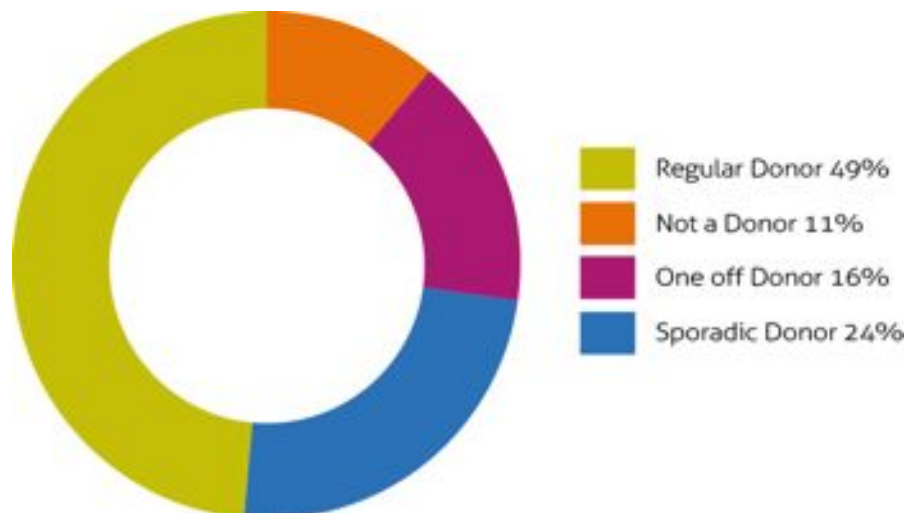
## 2. Mrs Cooke's relationship with charities

Mrs Cooke was a generous supporter of charities, giving to a wide variety of causes. She had a particular interest in supporting international development, children's, religious and military causes.

- As noted above, 88 charities in our sample confirmed that Mrs Cooke had donated to them. She was:
  - A regular donor to 48 organisations;
  - A sporadic donor to 24; and
  - A one-off donor to 16.

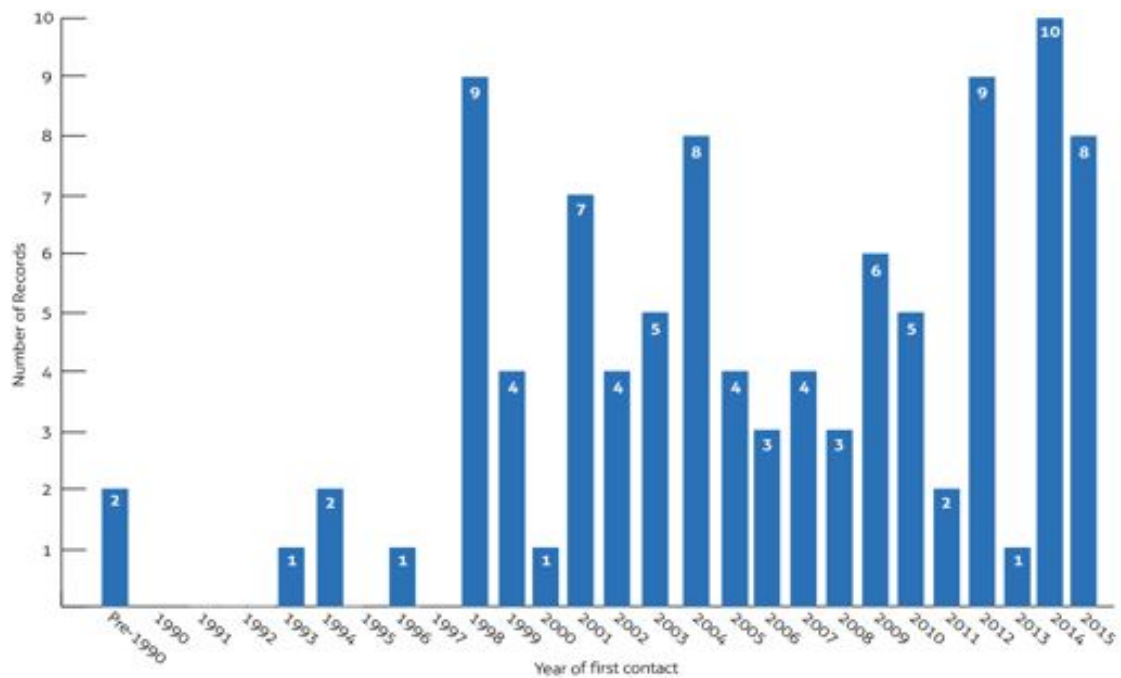
A further 11 charities confirmed that although Mrs Cooke was on their database, they had not received any donations from her.

### **Type of support given to the 99 charities holding Mrs Cooke's details**



Prior to the year 2000, she was being mailed by 19 of the charities in our sample, but since then 80 new charities wrote to Mrs Cooke for the first time, 32 of them within the last five years (up to May 2015).

### Year of first contact by the 99 Charities holding Mrs Cooke's details



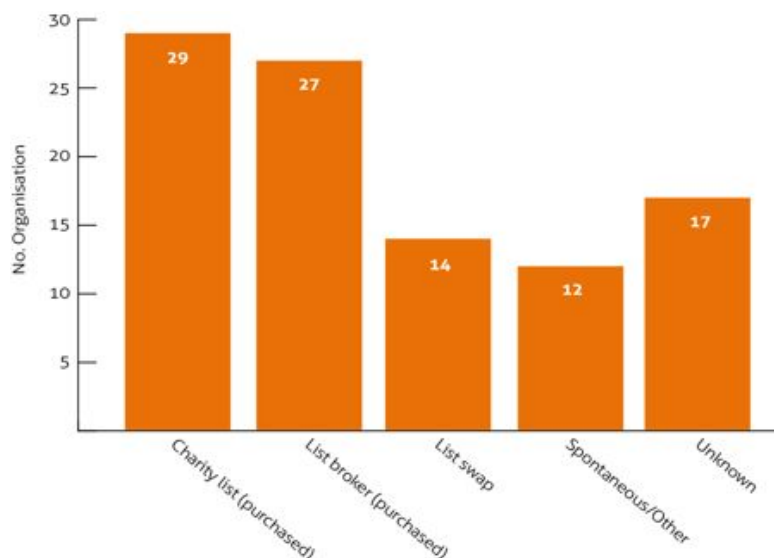
### 3. Data sharing and the sourcing of Mrs Cooke's details

Of the 99 charities in our sample contacting Mrs Cooke, 70 confirmed that they sourced her details from a third party, either through a donor list purchased by a fellow charity, from a commercial list broker or via an exchange of donor data with another charity (list swap). 17 charities (11 to whom Mrs Cooke was a regular donor) did not know where they had sourced her details from.

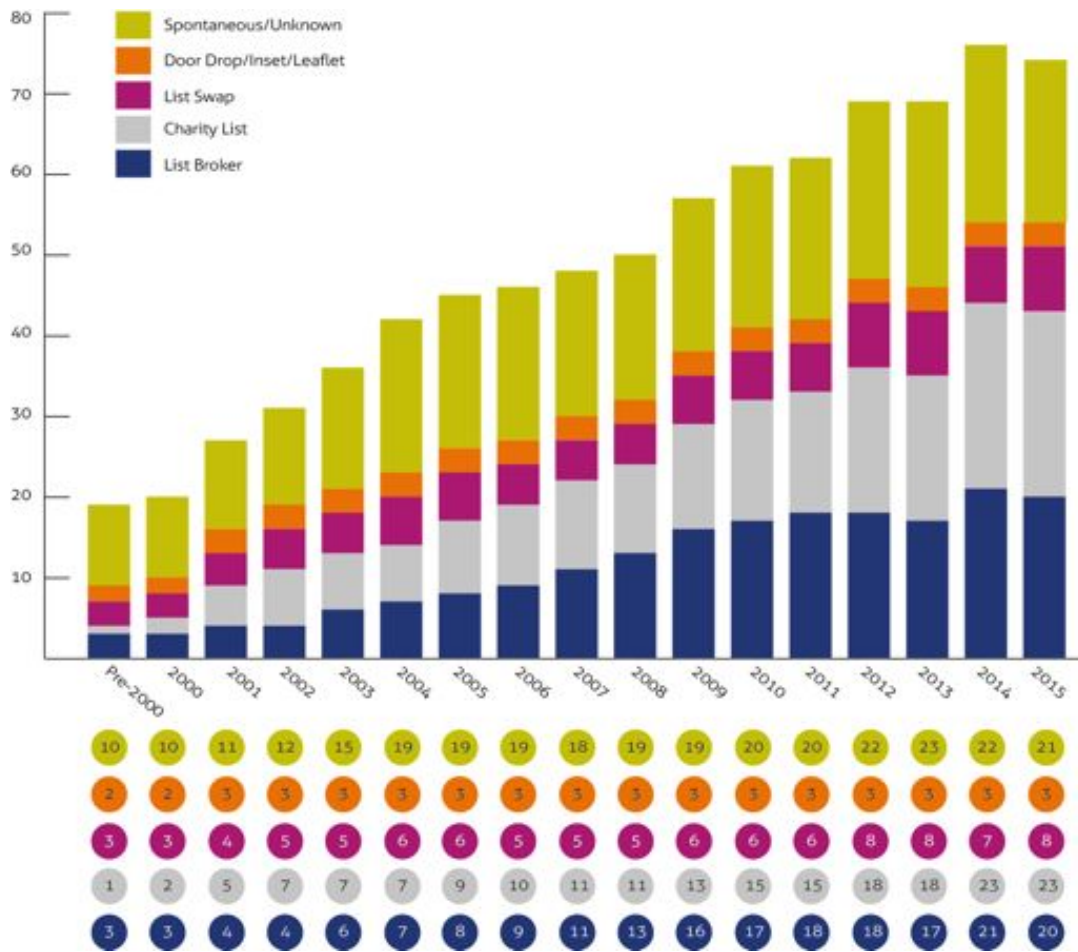
Our investigation uncovered that the 70 charities accessed Mrs Cooke's details via donor lists from 22 separate data suppliers and 17 separate charities.

There was a long-term gradual growth in the number of charities contacting Mrs Cooke. This activity ramped up after 2000, with an increase in the use of list brokers and charity lists.

### Source of data for the 99 charities holding Mrs Cooke's details



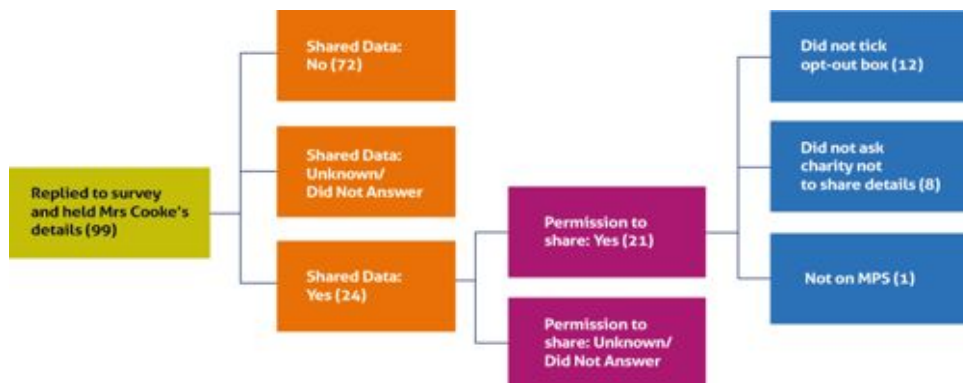
**Number of charities contacting Mrs Cooke by year and initial type of contact\*\***



24 of the 99 charities who had Mrs Cooke’s details on their systems confirmed that they shared Mrs Cooke’s details with a third party. The majority (72) stated they had not, and a further three charities did not know whether they had shared her details or not.

This evidence indicates that charities are more comfortable buying in donors’ contact details than with sharing their own data.

**4. Data sharing – consent**



\*\*The figures for 2015 are an estimate of the number of charities that we believe would have been in contact with Mrs Cooke and is based on the figures supplied to the FRSB during the course of this investigation



Of the 24 charities that shared Mrs Cooke’s details, 21 stated that they had consent to do this, although this permission was in virtually all cases only passively obtained since Mrs Cooke had not actively opted out.

As the previous table shows, 12 of the 21 charities confirmed that Mrs Cooke had not ticked the box indicating she didn’t want them to share her details; whilst eight confirmed that she would have been informed that her data might be shared and she did not proactively make contact with them and ask for this not to happen, and one organisation said they shared her data because she was not on the Mailing Preference Service.

During our investigation, four charities reported that they did not share Mrs Cooke’s details because she had opted out of data sharing and one further charity stopped sharing her details on request.

## **5. Opportunities to opt out from further charity contact**

Of the 99 responding charities that had Mrs Cooke’s details on file, only five confirmed that she had contacted them to ask if they could remove her from their mailing list.

14 charities provided an opt out ‘tick box’ in all communications. Ten charities confirmed that supporters would have had the opportunity to opt out at the first point of contact but not consistently thereafter, while two organisations gave an opt-out on initial contact and then annually.

56 charities indicated that they provide contact details of their head office in each appeal leaving it for supporters to contact them if they want to be taken off the mailing list. A further 16 charities stated that they did not provide any explicit opt out opportunities.

<b>Type of opt out opportunity provided</b>	<b>Count</b>
Opt out tick box provided in each communication	14
Opt out included in first communication but not provided consistently thereafter	10
Opt out included in first communication, then annually	2
Contact info of charity provided in each communication but no opt out box provided	56
Data cull on inactive supporters	1
No opt out options provided	16
<b>Total</b>	<b>99</b>

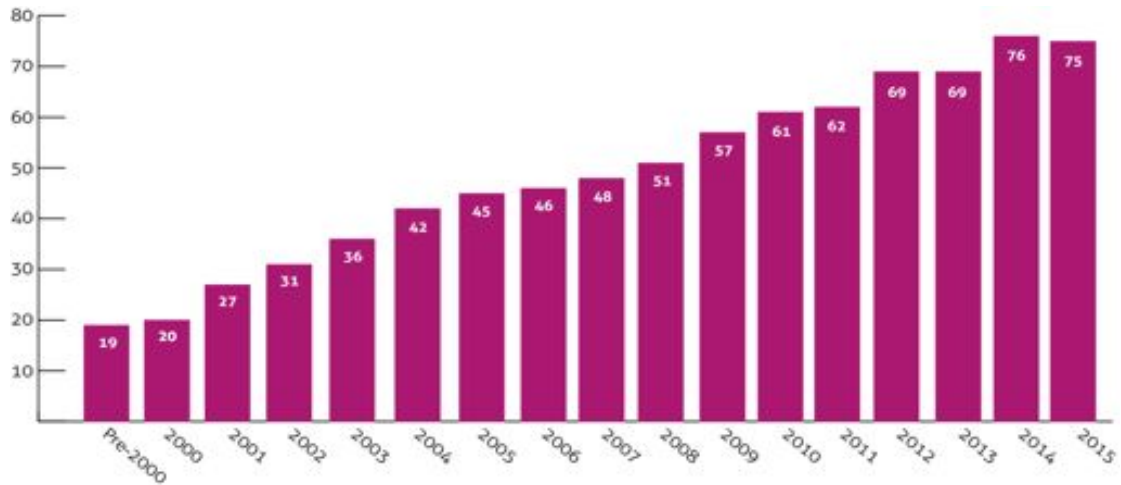
Most charities (85%) would have required her to contact them - on her own initiative - if she didn’t want to receive any further communications.

The FRSB recommended in its Interim Report of June 2015 that it should be a mandatory requirement for charities to include clear opt out opportunities in all future direct mail campaigns. The Institute of Fundraising has now amended the Code accordingly.

## **6. Pattern of contact and mailing frequency**

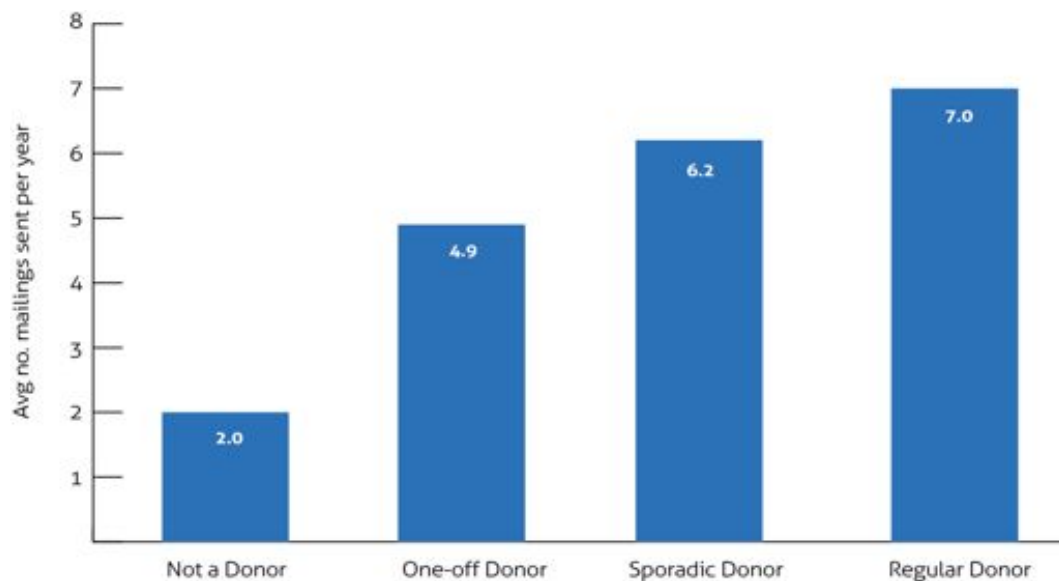
Mrs Cooke went from being contacted by 19 of the charities in our sample in 2000 to a peak of 76 in 2014. About half of the charities that contacted her were organisations that she supported as a regular donor. However, in more recent years, there was an increase in the proportion of charities contacting her to which she had donated just once.

**Number of charities contacting Mrs Cooke by year\*\*\***



The level of mail contact was higher by those charities to whom Mrs Cooke was a more regular supporter.

**Average number of mailings per year by type of support**

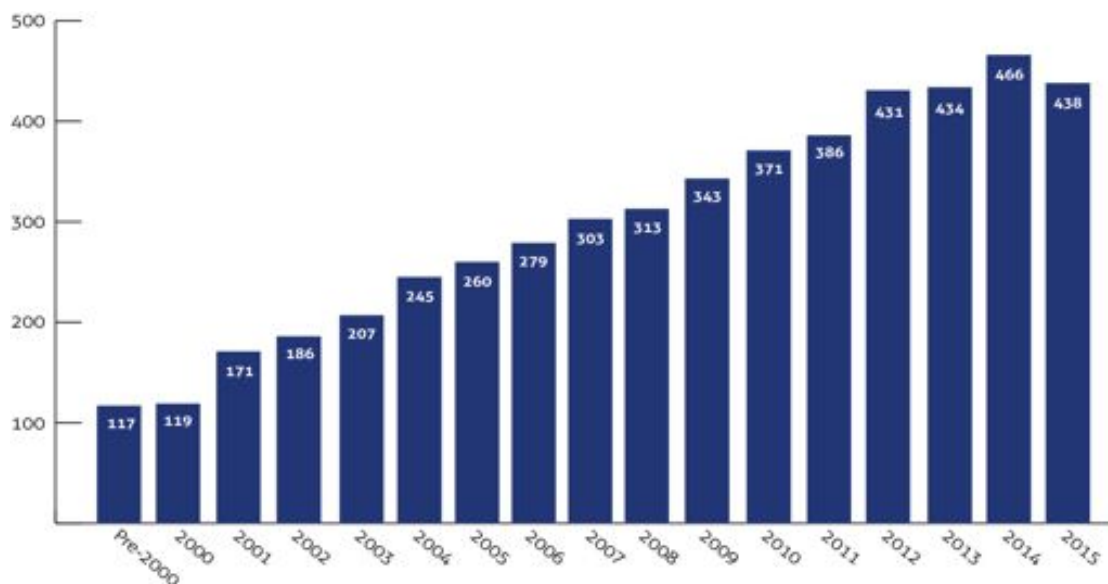


Mrs Cooke received an average of 5.8 mailings per charity each year. While the volume of mailings by most charities does not seem excessive, 16 of the organisations in our sample were sending Mrs Cooke between 10 and 14 letters per year and the cumulative effect of being contacted by so many charities would have been significant. Mail from the charities in our sample increased over the years from 119 in the year 2000 to over 460 mailings annually by 2014.

\*\*\* The figure for 2015 is an estimate of the number of charities that we believe would have been in contact with Mrs Cooke and is based on the figures supplied to the FRFB during the course of this investigation

As part of the review of self-regulation, a new Fundraising Preference Service has been proposed as a solution for donors receiving such high volumes of contact and those wishing to stop any fundraising approaches.

**Estimated number of mailings received by Mrs Cooke by year\*\*\*\***



The majority of mailings received by Mrs Cooke were from charities to which she was a regular giver. However, in recent years, she also received a growing number of communications from charities to which she gave just once or sporadically.

**Summary**

This investigation has demonstrated that Mrs Cooke was a generous supporter of charities, giving to at least 88 separate charities in her lifetime.

However, Mrs Cooke was not given adequate opportunities to opt-out of further contact from these charities and had not given express permission to have her details shared with others.

Mrs Cooke's experiences have led to a significant strengthening of the Code of Fundraising Practice. It is now for charities to ensure that donor interests are placed at the heart of all future fundraising activity.

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\*\*\*\*The figure for 2015 is an estimate of the number of mailings that Mrs Cooke may have gone on to receive during that year and is based on the figures supplied to the FRSB during the course of this investigation.

## **PART B: INVESTIGATION INTO COMPLAINTS RECEIVED FOLLOWING THE DEATH OF MRS COOKE**

This section of the investigation report summarises the complaints received by the FRSB during the three weeks that followed the death of Mrs Cooke, as published in the [FRSB's Interim Investigation Report](#) on 9 June 2015.

### **Key Findings**

During the three weeks that followed news of Mrs Cooke's death (15 May to 5 June 2015), the FRSB received a total of 384 complaints. The interim report addressed donors' collective experiences of fundraising, in addition to concerns raised about charity-specific practices.

Of the complaints raised:

- 70% related to direct mail activity;
- Four in ten (42%) addressed the frequency of charity communications;
- Over a third (35%) were specific to fundraising approaches made to the elderly or vulnerable people;
- One in six (16%) were about how consent is given for charities' use of contact data, with concerns that the current opting out measures for charity communications was unclear;
- 7% related to concerns about the buying, selling and sharing of data between charities and external data agencies;
- A further 7% were raised by people who felt pressurised by telephone fundraising;
- 4% concerned contact to people registered with the telephone and mailing preference services (TPS and MPS); and
- 3% were about gifts included in charity mail packs.

### **Published recommendations**

Based on analysis of the complaints received, the FRSB Board published recommendations that the Institute of Fundraising's Code of Fundraising Practice should be strengthened to ensure that the public were given greater control over the way that charities communicate with them.

In particular, the FRSB emphasised that the public must be given regular opportunities to articulate how often and in what ways they want to be communicated with, and whether or not they are willing to have their personal contact information shared with third parties.

In response, the Institute of Fundraising initiated a full review of fundraising standards and addressed all 17 of the FRSB's recommendations, also making two additional changes to the Code. The main changes to the Code are as follows:

- Every addressed fundraising communication must carry a clear message explaining how donors can easily opt out of receiving future communications;
- Charities are now banned from selling their supporters' personal data for commercial gain;
- Minimum font sizes will be introduced for opt-in and opt-out statements on all printed communications, including newspaper adverts and direct mail;

- Greater clarity will be provided on the provisions of the Data Protection Act and Privacy and Electronic Communications Regulations as enforced by the Information Commissioner's Office;
- Telephone fundraising - all charities must end a fundraising call when asked;
- All fundraising calls from fundraising agencies must be made from an identifiable number so the member of the public knows who has called and if they are unhappy they can follow up or report the caller; and
- The Code, which previously allowed charities to use "reasonable persuasion" to ask for support, has been changed and will now have clearer definitions that prohibit unreasonably intrusive behaviour that places undue pressure on a person to donate.

In addition, a forthcoming change will make it a requirement for charities to obtain express permission before sharing a donor's personal data.

The FRSB believes that these changes to fundraising practice represent a fundamental rebalancing between a charity's "right to ask" for funds and the public's "right to say no".

## APPENDICES

### Appendix I: FRSB recommendations and Institute of Fundraising (IOF) responses

FRSB Recommendations (June 2015)	Institute of Fundraising response	Date Code change implemented
The sector must give more control to the public over how often and in what ways charities communicate with them.	Accepted	N/A
IOF Code to specify the maximum number of times a charity can contact an individual per year.	Not accepted	N/A
IOF Code to be clearer on rules regarding opt ins and opt outs for all fundraising methods; not just SMS and MMS.	Accepted	November 2015
IOF Code to stipulate that opt outs must be available in all marketing communications and be clearly presented/worded.	Accepted	December 2015
IOF to review 'Treating Donors Fairly' guidance.	Accepted	Ongoing
Bearing in mind public sensitivities about the subject, IOF to review how charities communicate with older people and make changes to the code where appropriate.	Not accepted	N/A
IOF Code to stipulate how many times a telephone fundraiser can request a donation during one individual approach.	Accepted	November 2015
IOF Code to stipulate all telephone fundraising agencies must hold a TPS- Assured certification.	Accepted	November 2015
IOF Code to provide more clarity on how charities should monitor the conduct of third party fundraising agencies.	Accepted	November 2015
IOF to remove references to 'reasonable persuasion' from the Code	Accepted	November 2015

IOF Code to make it clear that charities should obtain express permission from donors before sharing their information.	Accepted	Pending
In the context of data sharing, the IOF Code should provide more detail on the associated provisions of the Data Protection Act.	Accepted	November 2015
IOF Code to remove footnote from code permitting charities to bypass TPS based on the relationship they have with a supporter.	Accepted	August 2015
IOF to review work conducted by 'The Nuisance Calls and Texts Task Force on Consent and Lead Generation' convened by Which? in March 2014.	Accepted	N/A
IOF to consider the efficacy of the Mailing Preference Service (MPS) as part of its Code review.	Accepted	N/A
Charities to consider the impact of any enclosures they use in mail packs; particularly within the context of placing pressure on the donor.	Accepted but already addressed in IOF Code	N/A
IOF Code to remove all references to 'OUGHTS' and replace with 'MUST'.	Accepted	June 2015

**Appendix II – FRSB questionnaire sent to FRSB member charities and other organisations that had communicated with Mrs Cooke.**

1. *Did you ever or do you hold Mrs Cooke's contact details on your database?*
2. *If so, how did you obtain these details? E.g. did you buy her contact details, did you secure them from a list broker or via a life style survey? If yes to any of these questions who did you buy them from and when were they obtained?*
3. *If she donated to your charity, what was the nature of her relationship with you? E.g. was she a regular donor or did she make a one off donation?*
4. *Did she ever contact your charity asking to be taken off your mailing list? If so, what action was taken?*
5. *Did your charity share her contact details with other organisations? If so, did she give her consent and what was the nature of that consent?*
6. *How many pieces of postal correspondence, on average, would you say you sent to Olive Cooke in any one year?*
7. *How did you give Mrs. Cooke an opportunity to opt out of communications with you? (This question is more about how your charity offers opt outs, rather than if Mrs. Cooke asked to be taken out of communications)*



## Appendix III – FRSB Fundraising Promise

### Our Fundraising Promise

We are members of the Fundraising Standards Board (FRSB) self-regulatory scheme. The FRSB works to ensure that organisations raising money for charity from the public do so honestly and properly. As members of the scheme, we follow the Institute of Fundraising's Codes of Fundraising Practice and comply with the key principles embodied in the Codes and in this Promise

#### We Are Committed to High Standards

- We do all we can to ensure that fundraisers, volunteers and fundraising contractors working with us to raise funds comply with the Codes and with this Promise
- We comply with the law including those that apply to data protection, health and safety and the environment

#### We Are Honest and Open

- We tell the truth and do not exaggerate
- We do what we say we are going to do
- We answer all reasonable questions about our fundraising activities and costs. Please contact us, visit our website or see our Annual Report if you require further details

#### We Are Clear

- We are clear about who we are, what we do and how your gift is used
- Where we have a promotional agreement with a commercial company, we make clear how much of the purchase price we receive
- We give a clear explanation of how you can make a gift and amend a regular commitment

#### We Are Respectful

- We respect the rights, dignities and privacy of our supporters and beneficiaries
- We will not put undue pressure on you to make a gift and if you do not want to give or wish to cease giving, we will respect your decision
- If you tell us that you don't want us to contact you in a particular way we will not do so

#### We Are Fair and Reasonable

- We take care not to use any images or words that cause unjustifiable distress or offence
- We take care not to cause unreasonable nuisance or disruption

#### We Are Accountable

- If you are unhappy with anything we've done whilst fundraising, you can contact us to make a complaint
- We have a complaints procedure, a copy of which is available on request. If we cannot resolve your complaint, we accept the authority of the FRSB to make a final adjudication