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**From 'intrusive' and 'excessive' to financially abusive?  
Charitable and religious fund-raising amongst vulnerable  
older people.**

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Review

## **From 'intrusive' and 'excessive' to financially abusive? Charitable and religious fund-raising amongst vulnerable older people.**

Dr Mark Redmond, University of Gloucestershire

### Introduction

In the UK the long overdue investigation into historic child sexual abuse is widely expected to uncover and confirm an unprecedented level of abuse perpetrated by a range of people in positions of power. One of the features is likely to be the whole scale abuse of children that took place almost '*under our own noses*' and in plain sight of everyone, in '*every day*' settings. At this stage we can only wonder about what might be discovered and then recommended in order to ensure that it doesn't happen again.

There can be no doubt that child sex abuse can lead to a life time of physical and mental distress for many survivors, and the inquiry may go some way to ensure that their stories are told, that they have an opportunity to seek redress and are able to move on. However, whilst this inquiry is long overdue and necessary there is a danger that the spotlight will remain exclusively on child sexual abuse to the detriment of other forms of abuse, sometimes perpetrated by the same people, or same institutions that are being held accountable today. One of these forms of abuse is the financial exploitation of vulnerable older adults. At present the subject of the financial abuse, of vulnerable adults outside of the family and the carer-service user nexus remains an under-explored issue in the UK. Consequently we lack a full understanding of its scope, nature, range and impact on victims and their families, and we therefore don't have an appreciation or awareness of the need to monitor, report, investigate and record. However, whilst this may be the case, it is possible to suggest that one direct consequence of a more open acknowledgement of the impact and nature of child sexual abuse, will be a readiness by some to begin to acknowledge other types of abuse that have taken place, in some cases, by the same perpetrators or the same organisations. In particular it is time to start to explore two distinct but closely related issues, namely the financial relationships that charities and voluntary organisations, as well as churches, religious groups and clergy, have with vulnerable older people. One of the lessons we must learn from all types of abuse is that it can actually happen '*under our own noses*' in '*every day*' settings, and in a manner that sometimes provokes an initial sense of disbelief before we take a second, clearer, view. Recent reports about the activities of charitable fund-raisers have positioned their activity as intrusive. None have yet dared to frame them in terms of financial abuse, as those working within health and social care might understand it. Yet arguably, when we look more closely at it that is exactly what it is. When older people are increasingly acknowledged as making a significant contribution to the economy through '*...a variety of other means, including gifts, donations and bequests to charities...*' (WRVS, 2011, pg.19), it is time to place some of these financial transactions under the spotlight and explore whether the nature of the exchange is a pernicious and excessive form of financial abuse on a scale we can't yet imagine.

### What is Financial Abuse?

Brown (2003) argues that the term 'abuse' can be applied to cover '*...a range of different acts and failures to act, by different perpetrators and in different settings...*' (2003, pg4). Whilst this definition can be applied to all forms of abuse, it is clear that it is useful starting point when considering the financial exploitation of vulnerable adults. By way of confirming this SCIE (2011) regard financial abuse as: -

*'Financial or material abuse, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation*

*of property, possessions or benefits*'. (SCIE (2011), pg. 2)

This is a definition to which we shall return later. In taking forward and exploring definitions it is worth noting that Brown (2003) argues that when we consider the nature and experience of financial abuse it can be used to describe: -

- Misappropriation of money and/or other assets by various means such as theft or fraud.
- Transactions to which the person could not consent or which were invalidated by intimidation, deception or exploitation.
- Misuse of assets legitimately accessed but wrongfully spent.
- Non-use of assets to meet the legitimate needs of a vulnerable person. (Brown 2003, pg5)

Reflecting these points SCIE (2011) suggests that financial abuse includes:

- theft
- fraud by abuse of position
- fraud by failing to disclose information
- fraud by false representation
- blackmail
- forgery
- ill treatment or neglect. (2011, pg. 3).

In this way we can see that the type of financial abuse experienced by vulnerable adults may reflect upon the vulnerability of the victim and / or the motivation of the perpetrator which might be anything on a scale between '*... intentional, wilful, deliberate, or malicious; or unintentional, benign, passive, or reckless*' (Glendenning, 1997).

In 2008 Help the Aged argued that financial abuse was '*...one of the most prevalent forms of elder abuse*' (2008, pg. 4), citing that in the year previous (2007) approximately 57,000 people aged over 66 years had experienced some form of financial abuse. This figure is dwarfed by that noted by O'Keeffe et al (2007), who suggest that 1% of those over the age of 66 years (86,500) experienced financial abuse within a 12 month period. It seems that first set of figures, at least, may be an underestimation, for Timmerman (2009), reporting from the United States, notes that '*... for every known case of financial elder abuse, there are four to five cases that go unreported*' (2009, pg. 23). Whilst Stiegel (2012), also from the US, quotes figures which suggest that '*... for every exploitation case reported to an agency 43.9 are not reported*' (2012, pg. 74). Whatever the true figure is, the 57,000 estimated cases in the UK, makes financial abuse the second most common form of maltreatment in the UK after neglect (Help the Aged: 2008). As if to reiterate the consequences of financial abuse Manthorpe & Samsi (2013) refer to Price *et al* (2011) noting that some authors have started to describe financial abuse as '*financial violence*' in an attempt to emphasise the impact that it has on the victims.

Older adults, and specifically vulnerable older adults, are at risk of financial exploitation as a result of frailty, being financially excluded, having low levels of financial awareness, and having varying degrees of cognitive impairment (Swan 2007). In recent years it has been exacerbated by changes in basic financial management systems and processes which have seen an increasing shift towards online shopping and banking, telephone banking, and the rise of payments through debit and credit cards, all of which require older people to have a certain level of financial and technological awareness. The shift of focus away from a signed cheque towards a 4 number password in order to withdraw cash has further increased opportunities for vulnerable older people to be exploited, through the use of proxies who might be more mobile and have easy access to ATMs.

In this situation the social isolation of vulnerable adults may act to increase risk rather than diminish opportunities for financial abuse, and make older people susceptible to doorstep or telephone salesmen who may access bank accounts through those new methods noted above. Timmerman (2009) develops this further noting that older people are often the target of:

*'... 'commercial' perpetrators ...viewed as trusting and not suspicious, perhaps because they grew up in a time when they knew their local merchants, insurance agents or bankers personally and they couldn't imagine dealings with them that weren't ethical and above board. (2009, pg. 24).*

One of the reasons why it is appropriate and necessary to focus more attention on financial abuse comes as a consequence of successive government policies across the western world that focus on personalisation and that of giving people greater choice and control over their care needs. Increasingly, the concept of choice and control has been interpreted as the financial power for vulnerable people to purchase their care, and in the UK this has been through the introduction of direct payments and personal budgets. Whereas prior to this change the 'service user' was outside of the purchaser-provider relationship, this development has increasingly located vulnerable older people in a direct commercial transaction with their carers and with care agencies. To put it simply the cash that pays for care is more readily available from people who do not have the financial safeguards local authorities and large organisations possess. At the same time, as people live longer with frail health, there is a greater use of proxies, such as family members or neighbours, acting informally or formally holding a Lasting Power of Attorney (LPA) over the financial affairs of an older person. Whilst this has the potential to remove the older person from a position of being exploited by a carer, it has opened up another form of possible abuse.

Historically social care organisations have focused their attention towards financial abuse on a limited number of potential perpetrators. Typically these can be regarded as falling into two groups, namely family, friends and neighbours, or carers and care agencies such as domiciliary companies and residential and nursing homes. It is a view under pinned by SCIE (2010) who suggest that *'... financial abuse is most frequently perpetrated by a person acting in a trusted capacity...'* (2010, pg. 8). In both contexts Bagshaw *et al* (2013) note that sometimes the relationship is *'...marked by physical violence, social isolation, emotional abuse, neglect, and financial exploitation...'* (2013, pg86). In Australia, Bagshaw *et al* (2013) note that financial abuse *'... is the most common form of reported or suspected abuse of older people (often accompanied by psychological abuse) and the older person's adult son(s) or daughter(s) are most likely to be the abusers...'* (2013, pg87).

Bagshaw *et al* (2013) refer to Wilson *et al* (2009) who notes: -

*'Older people's assets can be a site of competing interests. Families have an interest in protecting potential inheritances; the market has interests in promoting lifestyle, care, and accommodation options, as well as financial products, such as reverse mortgages; the state is concerned with self-provision and financial independence in older age, and, with service providers, also has an interest in preserving assets to pay user charges for health, care, and accommodation in older age'. (Wilson et al (2009), pg. 156 in Bagshaw et al (2013), pg87)*

These *'competing interests'* exist in the UK today.

Gibson and Qualls (2012) note that *'...elder financial abuse is largely private, occurring often in the context of close relationships'* (2012, pg26) where, according to Bagshaw *et al* (2013) the key risk factors to financial abuse are when; -

1. There was a family member with a strong sense of entitlement to an older person's

property/possessions

2. The older person has diminished capacity, e.g. dementia, depression, mental illness
3. The older person is dependent on a family member for care
4. The family member has a drug or alcohol problem
5. The older person feels frightened of a family member

Explaining this further Bagshaw *et al* (2013) suggest that:

*'... intentional financial abuse is linked to a range of attitudes ...{about}... older people and their resources that suggested it was acceptable to misappropriate an older person's assets, including notions that the older person's assets would eventually belong to them, that the older person no longer needed their assets, or would have wanted to have their assets used in this way; or that by providing assistance, the carer had "earned" the resource in question' (2013, pg99-100).*

This last sentiment is confirmed by Gibson and Qualls (2012), who note that the idea of earned entitlement *'... embodies the idea that family members are "due" by merits earned within the family system.'* (2012, pg. 27). As such it is regarded or excused as being a form of 'reciprocity' between the family member doing the abusing. Gibson and Qualls (2012) explain the rationalisation that may lay behind this noting two examples *'...I help out to make his/her life easier—he/she is simply reciprocating...'* or *'...I had a rough childhood—now it's time for him/her to make it up to me...'*

SCIE (2010) acknowledge that some family members may not see their actions as a crime and *'... think it's acceptable to take money from their vulnerable relative – especially if inheritance of the money is likely anyway...'* (2010, pg. 8).

Meanwhile, others *'...may feel that they are simply securing assets, to prevent their inheritance being spent on fees for care services.'* (SCIE 2010, pg. 8).

Whilst family members are most likely to be the perpetrators of financial abuse Oliver (2014) notes that 15-20% of this crime takes place within residential care. This is despite the fact that Knowles and Campbell (2013) note that it is less frequently reported. Here the range of abuse can span fraud and theft to being put under pressure, or a member of staff accepting an inappropriate gift (Oliver 2014). On the whole the management and oversight of potential financial abuse in a residential or nursing setting is undertaken through safeguarding policies and procedures and contractual obligations that employees are required to abide by.

Whether the offence is undertaken by a relative or a carer, the consequences of a decision to report a known misdemeanour can be profound, and it is a step that is not taken lightly. Indeed, Gibson and Qualls (2012) note that the older person *'... often refrains from informing other family members in order to protect the exploitative person, or for fear of losing daily living support. The process generally does not end until the older adult dies or all assets are depleted'* (2012, pg. 27).

Stiegal (2012) describes the position of a victim considering reporting abuse as being akin to a catch 22, in that:

*'...they are afraid they won't be believed; there is a stigma about being labeled [sic] a victim; they depend upon the perpetrator and fear the loss of that relationship; they are reluctant to get the perpetrator in trouble; they fear the perpetrator will retaliate; or they fear exposure of exploitation will lead to the appointment of a guardian or conservator or cause them to be placed in a long-term-care facility'* (2012, pg. 75-76).



The understandable attention on the types of common perpetrators of abuse and contexts where it takes place has meant that those working in the field of adult safeguarding have not been focused on those activities that takes place on the margins and with events and practices that take place in plain sight and '*under our own noses*'. At first sight these practices seem normal, natural and '*everyday*'. Charitable donations and giving to religious groups and clergy can fall precisely under this criteria and, as three separate events in the UK during the summer of 2015 highlight, this attention is now appropriate

### Charitable and religious fund-raising amongst vulnerable older adults.

Interest in the nature and experience of financial abuse of vulnerable older adults came to light in the UK through the death of a 92 year old woman, Olive Cooke. Mrs Cooke committed suicide by throwing herself down the Avon Gorge, near Bristol in spring 2015. In the aftermath of her death it became clear that in the months leading up to her death she received some 267 requests, by charities, for funding. These requests arrived within the period of a single month (Birkwood, 2015a). Mrs Cooke's relatives subsequently stated that her death was not a direct consequence of the letters received, and were instead labelled as '*intrusive*' (Eleftheriou-Smith, 2015) and '*excessive*' (Birkwood, 2015b). Whilst it is both understandable and excusable that the family might wish to make sense of the death in a specific way, more experienced professionals might come to a different conclusion given that she was also known to have made two previous attempts on her life in recent years and was suffering from depression and insomnia (BBC (2015) during the same period that she was receiving the requests for financial help from charities.

Amongst all of the noise that followed this death a number of questions have gone unanswered, the first one being how cancelling 27 direct debits might provoke over 200 further additional requests for funding? The answer throws a light on the opaque world of charitable fund-raising and the idea that those who already donate will be more likely to make further donations than those who do not. Indeed, at the time of her death, newspapers reported that Mrs Cooke's telephone number was on a list of individually named charitable donors traded by different data firms (Tominey, 2015), at the cost of £130 per 1,000 names (Ainsworth 2015). In this context donor information is therefore valuable as a marketable commodity. This leaves donors in a difficult situation where they are likely to be pursued for additional contributions, not least if they cease donating to a charity. Ainsworth (2015) explains the dilemma faced by people, like Mrs Cooke, who might wish to stop receiving letters from charities, noting that '*...it doesn't matter how many charities you write to, asking to be taken off their mailing lists... because a new letter will come through the door from someone else...*' (2015, pg2).

In the wake of Olive Cooke's death a number of commentators within the charitable world talked about a need to change practice. Alistair McLean, Chief Executive of the Fund-raising Standards Board (FSB), an umbrella body for charities and voluntary organisations, was reported as talking about the incident as a '*watershed*' moment (Birkwood 2015b) and, whilst recognising the death as a concern, Prime Minister Cameron endorsed the need for the FSB to review procedures and rules (Ware 2015). It was as if the matter required simply checking whether processes were robust. At no point has there been a concern that Mrs Cooke's experience represented the tip of an exploitative iceberg – part of a wider culture amongst charities that seeks to generate money. Yet, the reaction has a degree of incongruity about it. Specifically it is hard to reconcile an argument that simultaneously attempts to label the issues surrounding Olive Cooke's death as an isolated 'one off' event, whilst recognising the need for significant change in practice. There is a sense that the question of financial abuse has been acknowledged without it having been publicly named and discussed. The implication is that the financial survival of a range of charities and the services they provide appear to be too high a price to pay, and a sense of incredulity about organisations



concerned with doing good somehow being involved in an exploitative and abusive relationship with the very people who fund the work. The accusation has seemingly been written off before being publically investigated. Yet, the subsequent news in September 2015, that an 87 year old man suffering from dementia, also became a victim of the sale of lists of vulnerable charitable donors changes the context further.

In trying to unpick whether current practices by those who raise money for charities are tantamount to financial abuse it is worth returning to some of the definitions of financial abuse, noted above. As we have seen SCIE (2011) notes that financial abuse includes:-

*'... theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits'. (SCIE (2011), pg. 2)*

Although it would be difficult to argue that 267 separate requests were part of a sustained and orchestrated attempt to secure funds from Olive Cooke, it would be hard to suggest that this number of requests for funds, from charities, within a single month amounted to something other than pressure. What is significant, however, and which requires further exploration is the motivation of fund-raising organisations in sharing and buying names and addresses of people who already donate money. It appears that the person's name is on the list not because they have a concern for the individual charity's aims. Instead they are listed precisely because they have opened their purse or wallet to another charity beforehand and it has been calculated that this will make them more liable to donate again. The potential to secure a donation is the deciding factor and, arguably, this point pushes the exchange of that information into a potential exploitative relationship. This issue highlights an unsavoury and hidden aspect of charitable fundraising, much of which is undertaken by commercial, or arms-length, organisations on behalf of individual charities. These organisations often fail to fully explain the nature of their relationship with the charity they are raising funds for, when contacting a potential donor, and encourage an impression of the call or letter being direct from the charity itself (Graves 2012). The same applies to paid commercial 'tin shakers' working in high streets raising funds for a different charity every day of the week. This 'opaqueness' is at best misleading, but can present as a fraudulent activity. One of the possible reasons as to why this takes place could be a point that finds a resonance in Timmerman's (2009) assertion, noted above, of older people being the target of *'... 'commercial' perpetrators ...viewed as trusting and not suspicious...'* (2009, pg. 24). Charities occupy a trusting and non-suspicious position in the public imagination. However, given our growing understanding of how some abused children and young people are abused by those in positions of trust, and are sometimes shared by perpetrators, there is something unsavoury about the subject, not least in the profitable exchange of personal details of donors between the agents working for these charities, and sometimes the charities themselves.

In response to the circumstances surrounding the death of Olive Cooke a number of high profile charities have intimated their support for the notion of independent regulation. This, however, must be seen as just the start of a process designed to protect older people from financial exploitation, rather than a process whose intentions are to minimise the reputational damage to the charities themselves. In considering solutions it must be noted that whilst charitable fundraising has clearly been found wanting, it is not the only sector that deserves attention. Churches and religious organisations appear as being equally reliant on donations (through such things as the offertory plate, bequests and tithing) from individual members of local congregations, of whom older people make up a significant majority. Indeed, for example within the UK the Church of England alone relies upon donations totalling £750 million each year (Church of England (2015)). Again, as with charities, the nature of the financial arrangements that take place between an individual and their priest, church or religious organisation remains hidden, and the motivations and rationale for both giving, as well as receiving, are opaque. Yet given the fact that these organisations rely heavily on

local fund-raising from congregations of sometimes vulnerable older adults, there is a need to shine further light on them in order to satisfy ourselves that the relationship is not exploitative. However, just as systems and processes surrounding the management of complaints and allegations of child abuse within churches were found lacking, there is no evidence that the same religious organisations manage the protection of vulnerable older people in a rigorous manner. The Church of England's most recent pronouncement on protecting people 'Promoting a Safe Church' (2006) is now almost a decade old, and whilst it contains advice and recommendations for good practice, there is little evidence that they are followed robustly and consistently across the organisation. Any organisation that relies upon donations totalling three quarters of a billion pounds each year should demonstrate an appropriate level of financial integrity, not least as a form of recompense for the advantageous tax position religious organisations have in many countries.

Given the reliance upon raising large sums of money across the different religions and religious groups, there is a danger that both individual clergymen and women and churches, as organisations, can be regarded as belonging to those parties that are deemed to have a '*competing interest*' (Wilson *et al* (2009)) in the financial assets of older people. Increasingly the media is reporting thefts by parish priests ((BBC, 2005) and (Manchester Evening News, 2013)). Although they are identified as isolated events they highlight the degree of temptation that exists when handling large sums of money with little oversight. Indeed, during the summer of 2015 the case of Rev. Simon Reynolds received attention in the UK media due to the fact that he had kept an estimated £24,000 raised through fees charged for weddings and, up to 700 funerals (Edmonds, 2015). The fact that the thefts appear to have taken place over a six year period suggest internal processes for accounting for income generation within the Church of England are, as has been the case with managing paedophile priests, woefully inadequate and enabled the offences to continue.

In the context of working with vulnerable older adults it is important to acknowledge that the clergy have a similar level of privilege and access to older people to that enjoyed by GPs, nurses and carers. Whilst GPs and other carers are mainly focusing on the physical well-being of an individual, clergy have a particular responsibility for attending to the spiritual well-being of believers. It is a context that is ripe for abuse, but which continues to remain taboo and hidden, and unregulated or externally monitored. This is especially the case for those members of the clergy who continue to operate outside of team ministries with little local oversight in a semi-independent manner that is comparable to the single-handed GP surgeries that were highlighted in the wake of the Shipman inquiry.

Whilst many religious organisations like the Church of England (CoE) in the UK have policy statements regarding safeguarding vulnerable adults, they lack the systems and processes that put good intentions into action, and which might monitor and inspect custom and practice at the level of a parish or diocese. At a fundamental level there is no external verification and regulation of the processes through which churches secure a significant part of their income. Indeed, there is no formal and independent process that monitors and records the numbers of clergy who inherit money, property or other assets from their parishioners. Yet the lack of a record does not mean that it does not take place. In the absence of formal inspection and recording systems abusive transactions can take place. Whilst vulnerable older people may regard clergy and church officials as '*... trusting and not suspicious, perhaps because they ... couldn't imagine dealings with them that weren't ethical and above board.*' (Timmerman (2009), pg. 24), the history of child sexual abuse, and a growing dossier of financially abusive priests, tells us that in practice individual clergy can be completely the opposite. As such there can be no doubt that money and assets can be inappropriately secured for both personal and corporate gain. The question is how much, how often, and by how many?

In the UK, as in most western societies, donating to the church and religious groups is expected and to some extent are culturally encouraged, not least because of the tax exemptions and benefits that

might follow for both donor and recipient. As such, on one level these exchanges take place in plain sight and, as the offertory plate illustrates quite literally, under our own noses. However, as recent cases have highlighted, this does not mean that transactions are transparent and that in every case the processes that have been taken in order to secure that money are fair, reasonable and appropriate. Yet, at present they remain without any question of impropriety. This is despite the fact that in most dioceses priests will be inheriting property and monies from parishioners, and churches will be receive significant levels of regular and one-off donations. All of this takes place outside of a context in which safeguarding is paramount.

As those engaged in charitable fundraising begin to consider independent regulation and a stronger Code of Fundraising Practice (Institute of Fundraising (2015)), it is appropriate to start thinking about whether donations to both religious organisations and individual clergy should be included in these developments, and whether such combined activity should be enforced through statute. Whilst regulation should include the opportunity for the independent adjudication of complaints from the public, the case of Olive Cooke and the more recent incident surrounding Samuel Rae suggests it is also timely to consider a more '*belts and braces*' approach that adult protection deserves. Here then rigorous systems might include the introduction of statutory codes of practice for both individual fundraisers and clergy, alongside which a professional register might later be introduced (one might expect that a similar recommendation for clergy could emerge from Justice Lowell Goddard's inquiry into child abuse as a means to exercise greater independent and external control over the management of clergy). At the same time there is a need to consider it is appropriate to explore the compulsory registration of donations above a certain value on a centralised and independently monitored register, as well as the regular (ie annual or bi-annual) independent inspection of individual parish and diocesan accounts. These steps would not only enhance good practice and promote public confidence, they would act to minimise the opportunities for the types of abuse thrown up by the cases of Olive Cooke and Samuel Rae from taking place again.

#### Conclusion.

As we have become more aware of the complexity of abusive relationships it has been clear that some of it has taken place '*under our noses*' and in '*plain sight*'. Looking back with the help of what we now know, hindsight has helped us to look afresh at things that seemed perfectly normal and acceptable, but which were far from it. Here for example, some of the financial transactions, discussed above, and that have traditionally taken place within families have been reframed and reconsidered as being inappropriate. As such they have led to the greater use of the formal 'power of attorney' above more informal and looser arrangements within which abuse can take place. Charitable and religious donations occupy a similar terrain. Charitable giving is part of our everyday culture and, up until spring 2015, has received scant attention. The events surrounding Olive Cooke, and now Samuel Rae, demand that we adopt a more critical standpoint.

One of our starting points in revisiting charitable and religious donations has to be the recognition that many local services in the UK, rely on older people through providing both time and financial support (WRVS (2011)). These services are often regulated and inspected in order to ensure that the people who use them are protected from harm. Ironically, donors, who are often just as vulnerable as those who use the services they help pay for, are denied the same protection. Indeed, given the fact that donor information is a marketable commodity between charities and those that fundraise on their behalf, the potential for exploiting individual donors is high. However, whilst it appears that there is now some movement in the wake of Olive Cooke's death, there appears to be a reluctance to name the issue as being financial abusive. Instead, the remedy has been to focus on improving internal systems and processes. This has an implied sense of disbelief and denial, and finds a resonance in the original reactions to claims that priests, politicians and celebrities were involved in child sexual abuse. Yet, relying on the perpetrators of a financially abusive process to put their house in order is not the full answer. Instead a more suitable starting point is an acceptance that

current fundraising practices create the conditions where institutional financial abuse of vulnerable people has been allowed and encouraged, and that transparency and regulation has become both necessary and appropriate

Clergy are often the visual representatives of local charities and locally funded services. Indeed, given their obligation to ensure that the diocesan funds are collected through the 'parish share' and their direct engagement with vulnerable donors, whilst also having a pastoral role in administering to the needs of the same people, a conflict of interest arises and opportunities for exploitation take place. At present the giving of money to both the church as an organisation and the priest as an individual is hidden and a lack of internal rigour and accountability creates an opportunity for financial abuse to take place. The continuation of this unregulated activity appears to be based on trust. Given the fact that religious organisations and priests have abused trust elsewhere it is appropriate to consider whether it is time to change. A legally enforceable code of practice for both individual clergy and fundraisers may help in doing something that appears to be overdue – placing the most vulnerable and yet most generous in our society first.

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