

**Pauline Ross**

APPENDIX 1

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**From:** Catshill and North Marlbrook Parish Council  
**Sent:** 18 August 2014 10:39  
**To:** wrsenquiries  
**Subject:** Bromsgrove Street Collection consultation

**FAO Dave Etheridge  
Senior Licensing Practitioner  
Worcestershire Regulatory Services**

Thank you for consulting this parish council on Bromsgrove DC's street collection policy. Members have considered the proposed document and made note of it, ie no adverse comment to forward. The same applies to Bournheath Parish Council where I am also Clerk.

Kind regards,

Gill Lungley MILCM  
Clerk to the Council  
Catshill and North Marlbrook Parish Council  
Catshill Village Hall, Golden Cross Lane, Catshill, Bromsgrove B61 0JZ

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## Pauline Ross

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**From:** pat <pat@wythall-parish-council.org.uk>  
**Sent:** 19 August 2014 13:31  
**To:** wrsenquiries  
**Subject:** Street Collection Policy Consultation

Hello Mr.Etheridge

Having studied this document I can only say that, as Wythall does not have any Street Collections, this consultation does not affect us.

Regards,

*Patricia Harrison  
Executive Officer  
Wythall Parish Council  
Beaudesert Rd  
Hollywood  
B47 5DP*

*Tel: 01564 823149  
[info@wythall-parish-council.org.uk](mailto:info@wythall-parish-council.org.uk)  
[www.wythall-parish-council.org.uk](http://www.wythall-parish-council.org.uk)*

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## Pauline Ross

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**From:** Phoenix Children's Foundation <info@phoenixcharity.org>  
**Sent:** 01 August 2014 18:19  
**To:** wrsenquiries  
**Subject:** Street Collection Policy Consultation - Feedback

Good afternoon,

I am emailing regarding the new policy on the regulation of street collections; In the main part the terms are reasonable, however the restriction of one collection per charity per year poses a significant problem to ourselves and I'm sure other charities. Whilst we understand why this policy is in place as I'm sure you are inundated with requests, it will have a devastating effect on our funding capabilities in the area and as a result many children will lose out on vital funding. It would be a drastic measure to remove the allocation limit, however it may be fair to have the limit in place only allowing additional collection in special circumstances (as outlined on the new regulations) or if the date has not been taken close to the application deadline.

We would appreciate if you take our comments into consideration before the policy is finalised.

Please don't hesitate to contact me if you have any queries.

Kind Regards,

Melissa Wright  
Office Manager  
Phoenix Childrens Foundation  
[www.phoenixcharity.org](http://www.phoenixcharity.org)  
01530 267116



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## Pauline Ross

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**From:** Jill Stone <JStone@christian-aid.org>  
**Sent:** 27 August 2014 14:15  
**To:** wrsenquiries  
**Subject:** Draft policy for Street Collections in Bromsgrove

Dear Mr Etheridge

I am writing on behalf of Christian Aid supporters in Bromsgrove who organise collections of behalf of our organisation.

Christian Aid has a national license that enables us to conduct a H2H collection annually in May. [Exemption Order Reference CHC/97/7/49/1]. These collections are conducted by our local volunteer groups. All monies collected are counted in the presence of at least two people and are audited every year. Occasionally one of our local groups will also conduct a street collection or supermarket collection. The former with a license from the local council and the latter with permission from the relevant supermarket.

Our supporters wear tabards clearly marked with our name; they use tins or buckets, again clearly marked with our name, that are numbered and accounted for by the organiser – they may not be in consecutive numbers due to the logistics of organising the collection. Again, all monies collected are counted in the presence of at least two people and are included in the annual audit.

We appreciate Bromsgrove Council's desire to protect the general public from nefarious collectors and unwanted harassment, but some of the suggestions in your draft consultation policy could have negative implications for our supporters and our charity and we would strongly urge you to reconsider the following points:

Firstly, the definition of a "public place". The law on this issue is ambiguous, with no legal definition of a public place. We can understand that if a collector is standing in the entrance to a shop or shopping centre, where the public are walking past on the street, then that could be considered collecting in a public place. But if the collector is standing on private property (eg supermarket entrance, or inside a shop collecting from people already on the private property), then it has always been understood that permission from the shop or supermarket is all that is required.

If the necessity to apply for a licence applied to all collections in supermarkets as well as streets, there is going to be a lot more red tape involved. If the reason behind getting council authorisation for these types of 'public places' is to limit and monitor the frequency of the collections, I know that the supermarkets do this themselves – they will only accept a certain number of applications and never have more than one on any given day. So there shouldn't be a need for council monitoring as well.

Secondly, the necessity for the collecting tins to be numbered consecutively makes it very difficult to administrate. As a local office, we send out tins to supporters for use in their collections and then we get tins back in as and when they are able to return them. That means that we don't always have consecutive numbers to give out to supporters. We do keep track of our tins and they are numbered and accounted for. A more reasonable requirement would be 'All Collection Boxes must be numbered and accounted for and must be secured closed.....'

Thirdly, many of our supporters are elderly and prohibiting the use of chairs may prevent some people from volunteering if they cannot take a break to sit down at intervals.

Finally, 'our supporters say that not being able to apply for a licence for a Monday or Wednesday is quite restrictive.

I hope that you will take these points into consideration when drawing up our final policy on street collections.



Yours sincerely

**Jill Stone**

**Regional Coordinator**

Room 403B, The Big Peg

120 Vyse Street,

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[www.christianaid.org.uk](http://www.christianaid.org.uk)



----- Gaza Emergency Appeal As the death toll continues to rise, we have launched an emergency appeal to help the terrified people of Gaza. Our medical partner, PMRS, is already on the ground providing vital treatment and healthcare to more than 8,000 Palestinians every day. Please help our partners to do even more to respond to the desperate humanitarian needs emerging.

<http://www.christianaid.org.uk/emergencies/current/gaza-emergency-appeal/index.aspx> -----

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## Pauline Ross

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**From:** Stephen Service <stephen@pfra.org.uk>  
**Sent:** 06 August 2014 11:41  
**To:** wrsenquiries  
**Subject:** Bromsgrove Street Collection Consultation

Dear Dave,

Thankyou for drawing our attention to Bromsgrove's Street Collection Policy Consultation and giving the Public Fundraising Regulatory Association the opportunity to respond.

As your document makes clear, the majority of the new policy refers to cash collections which do not fall under the PFRA's remit. However, we have the following comments regarding the Direct Debit Collections section of the proposed policy:

*"It may be possible in the future to enter into an agreement with the PFRA to regulate DD collections. In the meantime any complaints or enquiries regarding DD Collections should be referred to the PFRA."*

The PFRA is very happy to respond to any enquiries regarding Direct Debit collections and always looks to ensure that any complaints it receives are satisfactorily addressed. However, it is important to emphasise that the PFRA's ability to regulate these collections is restricted unless a site management agreement is in place between the council, the PFRA and fundraisers operating in the area. Part of the purpose of a Site Management Agreement is to take into account the local needs of the community and agree a clear line of communication between the local authority and the PFRA by assigning local authority officials as gatekeepers within the authority. It is the most effective means by which the PFRA can ensure complaints are dealt with.

I look forward to meeting with you in September to discuss the prospect of a Site Management Agreement for Bromsgrove with you in more detail.

Best regards,

**Stephen Service**  
Outreach Officer  
Public Fundraising *Regulatory* Association

Tel: 020 7401 8452 / 07760 995031

[www.pfra.org.uk](http://www.pfra.org.uk)

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