

Open Fundraising

Our response to the PhonepayPlus consultation on the continued use of SKIP.

Some context

Over two years ago, Open Fundraising and UNICEF UK made the case to the mobile payment regulator PhonePay Plus (PP+) to grant an exemption from its code of practice and allow the use of SKIP in the delivery of charitable subscription services.

We are pleased to see that after an exhaustive period of testing PP+ intends to change its code of practice to allow the system to operate within the rules rather than under an exemption from them.

The view from Open Fundraising

We agree with the overwhelming majority of the findings documented in the consultation paper and welcome PP+'s intention to amend the code of Practice. Regular PSMS giving has been of huge benefit to the sector and its potential is still far from being fully realised.

The only addition we wish to challenge is detailed below.

'The requirement that consumers who text SKIP in 3 consecutive months must be immediately given the option to stop or continue, and be unsubscribed if they do not positively respond within 24 hours'

All of our learning and analysis of the data suggests that supporters understand the SKIP and STOP features of Regular PSMS. We can see from their behaviour that while multiple skips often precede a STOP, they do not always mean that a donor will terminate their relationship with their chosen charity.

To compel supporters to opt back into giving after successfully using the key feature of the product and being reminded of the STOP function without a clear consumer requirement seems overly onerous – especially given the so far overwhelmingly positive response from consumers.

In the current environment we are reminding donors of how to STOP if they skip in three consecutive months. When we offer this feature it is clear from the data that supporters have clarity on what to do. When we submitted data for the last review of the system we had a total of 19,479 supporters who had received at least three appeals, of which 647 had skipped the last three and been presented with a reminder to STOP as a result. 367 (57%) stopped their gift after being presented the reminder.

We recognise that the intention of PP+ was that supporter's gifts would be automatically stopped if they skipped three times in a row. As the data shows this is not necessary as supporters are taking an action to SKIP and half STOP when promoted, with the other half continuing to be opted into the system.

We believe that clarifying the exemption to reflect our 'accidental' test serves the consumer well.