



# Ringling the Changes

**Why it's time to reform the TPS to the advantage of  
telephone fundraising**

by

**Hugh McCaw**

chief executive  
Relationship Marketing

May 2009

# Contents

<b>Introduction</b>	<b>3</b>
<b>Executive Summary</b>	<b>4</b>
<b>1 Why should fundraising be treated differently to telesales?</b>	<b>5</b>
<b>2 The legislation was never intended to catch fundraising</b>	<b>6</b>
<b>3 Where do we go from here?</b>	<b>11</b>
3.1 Why do we need reform?	11
3.2 Precedents for reform	12
a) Market research	
b) Baby MPS	
3.3 What are the options for reform?	13
3.4 The consumer protection/choice issue	13
3.5 How do we make it happen?	13
<b>4 Summary of conclusions</b>	<b>15</b>
Appendix – biography of Hugh McCaw	17
References	18

## Introduction

If someone is registered with the Telephone Preference Service (TPS), then as a charity you cannot cold call that person to ask them to donate to you, or support you in any other way.

This has become such an accepted fact about the way we fundraise that hardly anyone ever thinks about whether it should be any different or whether it could have been any different.

In fact, even to suggest otherwise makes you seem like some kind of customer service heretic who wants to remove consumer choice and bombard people with all kinds of marketing calls they don't want.

But I believe we ought to look again at the nature of telephone fundraising calls and the TPS and whether there is a better system for opting in or opting out of charity calls that benefit the consumer, the charity and the beneficiary.

Earlier this year, I began talking to Members of the Scottish Parliament as well as my local Westminster MP to see if they could look at this issue. This was picked up in *Third Sector* magazine (Jordan, 2009) and the response that story generated from Relationship Marketing's clients and others convinced me that there is some support for reforming charities' relationships with the TPS.

That's why I have decided to produce this thought piece on the TPS and telephone fundraising. I don't see this as some great manifesto for change, but I do hope that it can start a debate and, with luck, this might be the catalyst that starts a movement for reform.

I want to try to show that charity telephone fundraising is qualitatively different from commercial telesales and so should be treated and regulated differently.

I want to suggest that the original legislation and the drivers to the original legislation were aimed at telesales and that fundraising just got caught in the net.

I want to suggest alternatives to the total opt-out of charity calls that is all the TPS rather crudely offers and also that there are already precedents how this might operate.

And I hope you'll see that a new system would preserve consumer choice and protection.

## **Executive summary**

Telephone fundraising is not the same as telesales – in fact it is very different in its intent (chapter 1).

Legislation covering privacy in the 1990s was aimed at curbing excesses of commercial cold calling and was never intended to regulate fundraising (chapter 2).

Because telephone fundraising had such a low profile in the 1990s however, the fundraising community never made an effective case for charities being regulated differently to telesales, even though the Department of Trade and Industry had suggested a separate opt-in for charities (chapter 2).

Reform of the TPS is needed because, even though the phone is not a major recruitment method for many charities, many small, local charities would benefit from being able to cold call local people (chapter 3).

There are precedents for regulating certain sectors of industry differently to telesales: market research and the Baby MPS (chapter 3).

There are three options for reform of the TPS:

1) Opt-in. Consumers who opt out of receiving unsolicited calls have the option of opting back in to receive calls from charities. This is the model suggested by the DTI in its original consultation in 1998.

2) Opt-out. Consumers who opt-out of receiving commercial cold calls will be presumed to accept charity calls unless they further opt-out of charity calls as well. (Chapter 3)

3) Charities should be exempted from TPS legislation.

There has been a 'miscarriage of justice'. In 1998, the government introduced the idea of a separate category for charities and then abandoned it a few months later.

The fundraising community needs to appeal that decision. We need to look again at the issue of how charity fundraising calls are treated by the TPS and begin lobbying to have them treated differently to commercial cold calling (telesales). And we need to go back to the government and Information Commissioner's Office and ask again for a separate category for charities in the TPS.

# 1 Why should fundraising be treated differently to telesales?

The reasons that charities initiate any contact with the public (using any communications medium and not just for fundraising) are completely different to the reasons businesses do so. A business will call with the sole intention of selling you a product. Since this will boost the company's profits, the call is made out of total self-interest.

Businesses need to market directly to consumers because they – the businesses – need new customers. Without them they go out of business. If that happens, some people lose their jobs and their income and consumers can no longer get this particular product or brand.

It's not quite the same for charities. On the face of it, we fundraise because we need new donors. Without new donors, it is possible the charity could run out of money and stop operating. But if charities stop operating, the effects are much greater than when a business goes bust.

When a charity closes its doors, yes some people lose their jobs. But the main effect is not that the consumer loses the choice of some types of products; it's that a different group of people – the beneficiaries – lose the services provided by the charity that they desperately need.

So a charity calls because it wants to engage a member of the public in redressing a wrong in the world. It might ask them to do that by donating money, or by campaigning or advocacy, such as signing a petition. The call is made not out of self-interest by the charity, but in the interests of others, its beneficiaries (or its cause).

Fundraisers – and I mean all fundraisers, not just telephone fundraisers – are not selling something in the way that commercial direct marketing sells to consumers. They are advocates, calling on behalf of someone or something – the beneficiary or cause – that needs support.

But, despite having completely different aims, when it comes to regulation, these two activities – telesales and telephone fundraising – are treated exactly the same.

This is because the ideas behind legislating direct marketing have focused on the method (calling people on the telephone) rather than the message (selling a product for self-interest against fundraising in the interest of others).

Because the method is the same, the regulation is the same. However, I believe that because the intent is different, it is time we seriously started to lobby for the legislation to take that into account.

## 2 The legislation was never intended to catch fundraising

Ten years after the introduction of the Telecommunications (Data Protection and Privacy) Regulations 1999, it is absolutely accepted that telephone fundraising falls within the definition of “direct marketing” covered in this act and its successor (the Privacy and Electronic Communications Regulations 2003).

But I’m not convinced that the legislation was ever intended for charity fundraising and it’s my contention that telephone fundraising was simply swept up in the regulation and now no-one ever considers it might not have been this way.

The driver behind the 1999 act was commercial cold calling – not just cold calling, but specifically automated cold calling. The use and abuse of predictive dialling systems from off-shore sites had created considerable disquiet about commercial organisations using such systems. Charities and telephone fundraising agencies were never accused of applying similar work practices.

Articles in the marketing press at the end of the 1990s all make references to the regulations – which stem from European Telecommunications Data Protection Directive (Directive 97/66/EC), or the TDPD as it was known – as targeting commercial direct marketing. [The 1999 Act led to the Telephone Preference Service – the voluntary system set up by the Direct Marketing Association in 1995 – receiving statutory backing as the official directory required by the TPDP.]

Writing in a specialist journal, data protection expert Heather Rowe said: “Clearly, this Article is aimed at junk mail by fax and random calling by automated calling systems....” (Rowe, 1998.)

In an article from June 1998 in the advertising industry magazine *Campaign*, Stephen Groom, head of marketing and privacy law at solicitors Osborne Clarke, described one of the main planks of the TDPD as: “Without an individual consumer’s prior consent, it will be illegal for direct marketers to contact consumers by either unsolicited faxes or auto-dialling or automated calling machines.” (Groom, 1998.) The other plank of course is the prohibition on cold calling from human operators.

His article is full of references to “telemarketers” and “consumers”, implying the commercial intent behind the directive, but not a mention of “donors” or “fundraisers”.

Another example is a news item from *Marketing* magazine in November 1998 about the publication of the Privacy in Telecommunications Bill (which led to the Telecommunications (Data Protection and Privacy) Regulations 1999). This states that:

“*Consumers* are to be made aware of their right to stop unsolicited calls from *companies*...The new law will make it illegal for *companies* to phone *consumers* who have indicated that they do not wish to be called.” (My italics.) (Marketing, 1998.)

It’s not surprising the sector press took this angle because the Direct Marketing Association’s consumer brochure promoting the TPS was entitled: “How you can STOP unwanted telephone *sales* calls.” (Capitals in original, my itals.) (DMA, 1999).

Even as late as 2003 – the year the Privacy and Electronic Communications Regulations (PECR) supplanted the 1999 act – the DMA was referring to the TPS in terms of its commercial intent. In a press release from that year, the DMA describes the TPS as: “The free-of-charge register that gives [*consumers*] the power to put an end to calls from *companies* seeking to *sell* their *products* and services.” (My italics.) (DMA, 2003.)

By that time, charity telephone fundraising had been completely subsumed within this idea of commercial telesales to the point that no-one ever considered that it might have its own – and very different – identity, the kind of identity I outlined in chapter 1 of this white paper.

But it wasn’t inevitable that it should turn out this way. Before the TDPD could be implemented into UK law by the Department of Trade and Industry (as it was then – now the Department of Business, Enterprise and Regulatory Reform [BERR]), the DTI had to draft regulations and put these out to consultation (DTI, 1998a).

To date I have not been able to get a copy of this consultation document (although I have got the press release announcing it): The BERR does not archive previous DTI materials online; there is no hard copy in the BERR library; and the British Library does not list it in its catalogue.

So we have had to piece together its contents from contemporary reports (Grooms, 1998; Rowe 1998).

It’s clear that the DTI always favoured an opt-out system, whereby consumers are deemed to accept unsolicited calls unless they specifically opt-out – this is how the TPS operates. This is in preference to the opt-in system, whereby consumers are deemed not to want cold calls unless they opt-in to them. (The TDPD left it up to member states to choose either an opt-in or opt-out system.)

But the original DTI consultation made a specific suggestion that charities might not be part of the general opt-out system.

Heather Rowe wrote: “The Government wondered if it would be possible to have a system whereby subscribers could choose to consent to receive unsolicited direct

marketing calls from certain types of organisations – the example given [i.e. in the DTI consultation document] was charities.” (Rowe, 1998)

This is confirmed in Groom’s *Campaign* article, where he says that the consultation paper stated that whatever system was implemented “might also allow consumers to identify particular organisations from which they would be willing to receive unsolicited calls, for example charities.” (Groom, 1998.)

So the DTI had – right at the start of the consultation that ultimately led to the two pieces of UK legislation covering telecoms data privacy – allowed for the possibility of an opt-in system for charities as part of an overall opt-out system.

In other words, the DTI had originally suggested that the system would allow consumers to opt-out of receiving unsolicited calls in general, but then opt back in to receive cold calls from charities.

But in the explanatory document accompanying the draft regulations that was issued just a few weeks after the consultation closed – and which briefly summarised some of the responses to the consultation – it is clear this opportunity for charities had been lost (DTI, 1998b).

The DTI left the door ajar for us. So why didn’t we kick it open?

Well we did try. The Institute of Charity Fundraising Managers (as the Institute of Fundraising was then) did lobby for a separate category for charities. They also lobbied for a blanket exemption (source: email from Andrew Watt, then head of policy at the ICFM). But it didn’t come to anything.

What happened in those few months between the DTI suggesting a separate category for charities in their initial consultation and then abandoning the idea completely in the draft regulations just a few months later?

I am still trying to find out but it is difficult piecing things together. The Institute of Fundraising has so far not been able to supply us with a copy of their consultation response and the people who worked on this are now doing other things.

But as the DTI had suggested the opt-back-in for charities, someone must have persuaded them otherwise. With the ICFM supporting the separate category for charities, someone, or some organisation, must have made some pretty powerful counter-arguments that swung the DTI away from a separate category and towards treating telesales and fundraising exactly the same.

I believe that whatever the DTI’s reasons were for not giving charities a separate opt-back-in category, they represent a miscarriage of justice. I believe they were wrong

not to have conceded this to the charity sector and I believe we should go back to the government and Information Commissioner's Office and ask for it again.

Part of the reason we didn't get this concession might be because the whole issue didn't seem to register strongly on the charity sector's radar.

Even though the ICFM was lobbying the DTI for exemption and a separate category, this issue did not generate a lot of coverage in the sector press. As the voluntary sector's main news magazine, *Third Sector* did not run a single story about the DTI consultation or draft regulations throughout the whole of 1998. *Third Sector* did not run a news item about the new regulations until June 1999, five weeks after they came into force – and that focused on telemarketing and made no specific reference to fundraising (Palmer, 1999).

It seems that the whole TDPD issue was not causing a lot of concern among phone operators. Why was this?

First, charity telephone fundraising did not have a high profile in the mid-to-late 1990s (some might say that it doesn't now either).

Telephone fundraising burst on to the scene in the early 1990s when it was hailed as the 'next big thing' in fundraising and attracted the same types of controversy as face-to-face does now – undermining public trust, invading privacy, making people feel guilty, all that kind of stuff.

But the big difference compared to F2F is that F2F is highly visible whereas telephone fundraising is, literally, a back room operation. Far from becoming the next big thing, the telephone as a fundraising tool slid out of view. When F2F appeared in 1996, that really did become the next big thing in terms of cold acquisition, and the phone was assigned a rather marginal role of supporting DM campaigns and making upgrade calls to warm supporters. As it was not a major cold acquisition method, the phone perhaps wasn't seen as something that was threatened by the TPS.

And, of course, volumes of charity telephone fundraising were (and still are) tiny compared overall to telesales.

By the time the marketing sector came to look at the implications of implementing the TDPD, it's not surprising that telephone fundraising slid in under the radar.

So in summary:

- Privacy legislation was driven by commercial abuses of cold calling, especially through automated calls, and was never specifically aimed at fundraising, which

claimed far smaller volumes, did very little cold calling and did not make as much use of automated call technology.

- The original DTI consultation on implementing new European legislation raised the possibility of an opt-in system for charities as part of an overall opt-out system. So the government has recognised in principle that charities could be treated as a special case.
- Perhaps because telephone fundraising was a relatively small part of donor acquisition, not to mention a tiny part of overall cold call direct marketing, the charity sectors arguments for a separate category did not achieve a high profile. At the same time, some organisation must have argued forcefully *against* a separate category for charities.
- Telephone fundraising therefore became caught in the consumer protection net that was intended to prevent excesses and abuses of commercial cold calling.

### **3 Where do we go from here?**

We know that the government was entertaining the possibility that consumers could be allowed to opt-in to receive charity calls even though they had opted out of receiving cold calls generally.

That means that, in principle, they were prepared to accept that charities engaged in fundraising were different to commercial telesales.

In recognition of this, I think that, as a sector and led by the Institute of Fundraising, we should begin to lobby the Information Commissioner to reform the TPS.

#### **3.1 Why do we need reform?**

First of all, I believe the TPS ought to have a different system for charities because I don't think the current system is fair. I don't think it was ever intended to put the brakes on fundraising and because of that, it is only right that the system should be reformed.

But more importantly, charities need access to every available source of income.

The telephone is not a major route to new donors for many charities and it might never be. Personally, I think its main role will be in stewardship of donors that have been recruited through other methods.

But there are plenty of charities that could benefit from cold acquisition using the phone – and many do. We work with a range of international, national and local charities, some medium and some small. Relationship Marketing has acquired more than 1.5 million new donors (as well as volunteers) for its charity clients through cold acquisition and this continues to be a very effective fundraising investment initiative.

Some charities need the option of cold call recruitment and the current opt-out system cuts off a route to potential donors as approximately 60 per cent of British households have registered with the TPS.

And even taking the stewardship route, there are many charity donors who are registered with the TPS. Thanks to the efforts of Sustrans, the ICO changed the rules to allow 'administrative' calls to such donors – such as checking their Gift Aid status (Professional Fundraising, 2004). We can then secure their permission to make further fundraising calls. But this is costly and time consuming and a reformed TPS could provide a simpler route to these donors.

### **3.2 Precedents for reform**

There are already precedents for treating fundraising differently to the bulk of commercial cold calling.

#### **a) Market research**

Market research calls – of the type conducted by the likes of MORI and BMRB – are exempt. The official reasoning from the ICO is that market research is not ‘direct marketing’, which is defined in section 11 of the Data Protection Act 1998 and so is exempt from the TPS by definition (source: telephone call to ICO helpline).

This act defines direct marketing as: “...the communication (by whatever means) of any advertising or marketing material which is directed to particular individuals.”

One TPS-registered blogger, who had been called by MORI, contacted the TPS to complain and was told: “TPS does not cover Market Research calls as they are asking your opinion rather than trying to sell you something.”

[www.workfresh.com/01313012940/01313012940.html](http://www.workfresh.com/01313012940/01313012940.html)

This backs up perfectly the point I made in chapter 1. Market research is allowed because it is not trying to sell you something. But neither is telephone fundraising, not in the sense of a sale as a contractually-binding financial transaction – which is what is meant by the legislation.

Market research is exempt from the TPS because, even though it uses exactly the same medium as commercial cold calling – the telephone – the decision on how to regulate it has been based on the intent behind the call rather than the communications medium used.

So the exemption for market research establishes the precedent that the TPS status of cold calls can be decided on their message and intent, rather than the medium.

#### **b) Baby MPS**

A second precedent is the existence of the Baby MPS. This is a special subsection of the Mail Preference Service that allows parents who have recently lost a baby or young child to opt out of receiving marketing material about baby and infant products for a fixed period in case they find these distressing.

This is a precedent for treating one sub-sector differently to the rest.

[www.mpsonline.org.uk/bmpsrl/](http://www.mpsonline.org.uk/bmpsrl/)

### **3.3 What are the options for reform?**

There are three main options to reform the TPS.

1) Opt-in. Consumers who opt-out of receiving unsolicited calls have the option of opting back in to receive calls from charities. This is the model suggested by the DTI in its original consultation in 1998.

2) Opt-out. Consumers who opt-out of receiving commercial cold calls will be presumed to accept charity calls unless they further opt-out of charity calls as well.

3) Charities should be exempted from TPS in the same way that market research calls are.

There are also two further options – donors should be able to opt-in to receiving calls from charities they already support or will be presumed to want to receive calls unless they further opt-out. Both these options imply that, even though a donor may be TPS-registered, a charity that they have a relationship with can call them with fundraising calls.

I cannot see how any of these five options would be a major technological challenge for the TPS. They simply involve at most an extra tick box when a person registers.

### **3.4 The consumer protection/choice issue**

One final objection to overcome is that of consumer protection. When *Third Sector* ran its news item about my starting a dialogue with MSPs on this subject, the online story received some predictable comments about how this would take away consumer choice (Jordan, 2009).

I really don't see how giving potential donors more choice about whether they will or won't accept unsolicited calls from charities damages their rights as consumers. There are options I have described that allow a consumer to say – categorically – that they do not want to receive cold calls from a charity. They are protected.

But choice is enhanced because consumers are given the option of receiving calls, *if they want to receive them*. That, surely, is what consumer choice is all about.

### **3.5 How do we make this happen?**

Before we can take this anywhere, there needs to be a debate in the fundraising sector about reforming the TPS. There is a huge inertia to overcome because a lot of people just take it for granted that telephone fundraising should not be treated differently to commercial cold calling. We need to challenge this attitude.

We also won't get anywhere unless we can engage the Institute of Fundraising, and I intend to begin a dialogue with the Institute on this subject.

I think that there is an excellent case for the Institute to lobby the Information Commissioner's Office to reform the TPS. I hope this white paper can set the ball rolling.

## 4 Summary of conclusions

It is time that the fundraising community began to lobby seriously and concertedly to reform the TPS.

This is justified because:

- The legislation covering privacy and unsolicited calls (first, the European Telecommunications Data Protection Directive, then the two British Acts: Telecommunications (Data Protection and Privacy) Regulations 1999 and Privacy and Electronic Communications Regulations 2003) were intended to curtail abuses of commercial sales cold calling and not aimed at fundraising. Fundraising was therefore caught up in the consumer protection net.
- Telephone fundraising is qualitatively different to telesales. Telesales are self-interested and concerned with maximising sales and profit for the company making the call. Fundraising is other-directed and concerned with improving the lives (or condition) of the charity's beneficiaries. Current legislation treats them equally because the medium they use is the same even though the intent is different.
- The original DTI consultations on implementing new European legislation raised the possibility of an opt-in system for charities as part of an overall opt-out system. So the government has recognised in principle that charities could be treated as a special case.
- There are existing precedents to making a special case for charities. Market research is exempt from the TPS because it is not selling, even though it uses the same medium as telesales and fundraising. It is regulated differently because it has a different intent. So it sets a precedent for treating fundraising differently because that too has a different intent to telesales (which was the main driver behind the original legislation). The Baby MPS sets a precedent for making a special case for a specific industry sector.

There are three main options to reforming the TPS:

1) Re-designate charities as per market research.

2) Opt-in. Consumers who opt-out of receiving unsolicited calls have the option of opting back in to receive calls from charities. This is the model suggested by the DTI in its original consultation in 1998.

3) Opt-out. Consumers who opt-out of receiving commercial cold calls will be presumed to accept charity calls unless they further opt-out of charity calls as well.

- The fundraising community needs to look again at the issue of how charity fundraising calls are treated by the TPS and begin lobbying to have them treated differently to commercial cold calling (telesales).

In their initial consultation, the Department of Trade and Industry raised the possibility of a separate category (an 'opt-back-in') for charities, but abandoned this idea a few months later when they drew up the draft regulations.

But I believe that whatever the DTI's reasons for not giving charities a separate opt-back-in category may have been, they are a miscarriage of justice. I believe they were wrong not to have conceded this to the charity sector. The fundraising sector now needs to appeal against that decision. We must go back to the government and Information Commissioner's Office and ask once again for a separate category for charities in the Telephone Preference Service.

## **Appendix**

### **Hugh McCaw**

Hugh McCaw came into the voluntary sector more than 20 years ago following a very successful career in shipping, where he owned a shipping company. His roles include director and chief executive across a range of charities, including Action for Children, where he was awarded fundraiser of the year, Mencap And Children's Hospital Appeal. Hugh was also founder in 1994 of Children Today Charitable Trust supported by the patronage of the Duchess of Westminster. He was one of the founders of the North West Institute of Fundraising, is a former trustee of the Institute of Fundraising, and was recognised by his peers for his contribution to fundraising by being elected as a Fellow of the Institute in 2006.

He is now chief executive of Relationship Marketing, the telephone fundraising agency he set up in 1997.

## References

- Department of Trade and Industry (a)** – Press release: *Implementation of the Telecoms Data Protection Directive*, April 1998  
<http://web.archive.org/web/19990417090739/www.dti.gov.uk/cii/tpdp/condoc.htm>
- Department of Trade and Industry (b)** – Explanatory document: *Telecoms Data Protection Directive: Implementation in the UK – Draft Regulations*, 1998  
[http://ecaue.xisl.co.uk/documents/doc\\_2.pdf](http://ecaue.xisl.co.uk/documents/doc_2.pdf)
- Direct Marketing Association** – Sales brochure: *How To STOP Unwanted Sales Calls*, 1999 [www.dma.org.uk/ attachments/resources/736\\_S4.pdf](http://www.dma.org.uk/attachments/resources/736_S4.pdf)
- Direct Marketing Association** – Press release: *Consumers Show Support for the TPS*, July 2003. Printed copy. Not archived on DMA website but available at:  
[www.creativematch.co.uk/viewnews/?88604](http://www.creativematch.co.uk/viewnews/?88604)
- European Parliament** – Directive 97/66/EC (Telecommunications Data Protection Directive) [www.aip-bg.org/lichnidanni/pdf/directive\\_97\\_66.pdf](http://www.aip-bg.org/lichnidanni/pdf/directive_97_66.pdf)
- Grooms, Stephen** – *Telemarketing – Your Number’s Up*, Campaign, June 26, 1999,  
[www.campaignlive.co.uk/news/28437/](http://www.campaignlive.co.uk/news/28437/)
- Office of Public Sector Information** – Data Protection Act 1998  
[www.opsi.gov.uk/acts/acts1998/ukpga\\_19980029\\_en\\_1](http://www.opsi.gov.uk/acts/acts1998/ukpga_19980029_en_1)
- Office of Public Sector Information** – Telecommunications (Data Protection and Privacy) Regulations 1999 [www.opsi.gov.uk/si/si1999/19992093.htm](http://www.opsi.gov.uk/si/si1999/19992093.htm)
- Office of Public Sector Information** – Privacy and Electronic Communications Regulations 2003 [www.opsi.gov.uk/si/si2003/uksi\\_20032426\\_en.pdf](http://www.opsi.gov.uk/si/si2003/uksi_20032426_en.pdf)
- Jordan, Hannah** – *Good Call*, Third Sector, March 17, 2009  
[www.thirdsector.co.uk/Channels/Fundraising/Article/890686/Good-call/](http://www.thirdsector.co.uk/Channels/Fundraising/Article/890686/Good-call/) (password required)
- Marketing** – *Privacy Laws Set to Hit Cold Calling*, November 19, 1998  
[www.brandrepublic.com/Marketing/News/52144/New-DM-law-may-curb-cold-calling/?DCMP=ILC-SEARCH](http://www.brandrepublic.com/Marketing/News/52144/New-DM-law-may-curb-cold-calling/?DCMP=ILC-SEARCH)
- Palmer, Henry** – *Telemarketers Face Fines for Unsolicited Calls*, Third Sector, June 10, 1999 (not archived online)
- Professional Fundraising** – *Donors Who Give Phone Numbers Will Have TPS Registration ‘Overridden’*, Mid-September 2004 (not archived online)
- Rowe, Heather** – *Telecoms Data Protection – UK Implementation*, Computer and Law Security Report vol 14 no 6 1998 (not archived online)