Charity 501
SC501001

Safeguarding Policy

0.1 | Draft for board approval

Document Control

Document title	Safeguarding Policy
Version	0.1
Status	Draft for board approval
Owner	Designated Safeguarding Lead
Designated Safeguarding Lead	
Deputy Designated Safeguarding Lead	
Approved by (name and role)	Board of Trustees
Date approved	[INSERT DATE OF BOARD APPROVAL]
Next review due	[INSERT DATE — no later than one year from approval]
Classification	

Version History

Version	Date	Author	Summary of changes
0.1			

Before adoption

Confirm every field above and every placeholder in this document (such as [INSERT NAME] or [INSERT DATE]) has been completed before the board adopts it. Then read the whole document against the charity's own circumstances: every statement about what the charity holds, has decided, has arranged or has already done must be true, and anything that is not must be changed before adoption.

- [CHARITY TO CONFIRM: the name and job title of the Designated Safeguarding Lead, to be inserted at clause 7.1]
- [CHARITY TO CONFIRM: the name and job title of the Deputy DSL, to be inserted at clause 7.2]
- [CHARITY TO CONFIRM: the name of the nominated trustee who acts as the alternative reporting route, to be inserted at clauses 7.3, 11.5 and 9.5]
- [CHARITY TO CONFIRM: the local authority name and contact number for children's social work, to be inserted at clause 9.3]
- [CHARITY TO CONFIRM: the local authority name and contact number for adult social work / adult protection, to be inserted at clause 9.4]
- [CHARITY TO CONFIRM: the agreed procedure for a missing child or late collection at the end of a youth programme session, referenced at clause 16.8]
- [CHARITY TO CONFIRM: the name of the role responsible for maintaining training records, to be inserted at clause 17.5]

- [CHARITY TO CONFIRM: the name of the role staff and volunteers contact for additional wellbeing support, to be inserted at clause 18.3]
- [CHARITY TO CONFIRM: details of any employee assistance or external support service available to staff and volunteers, at clause 18.3, or remove the sentence if none is available]
- [CHARITY TO CONFIRM: the DSL's safeguarding training is current and recorded before this policy is adopted]
- [CHARITY TO CONFIRM: PVG scheme membership is in place and current for everyone already in a regulated role at the date of adoption]
- [CHARITY TO CONFIRM: ICO registration is in place, given that this policy references processing of special category safeguarding data]
- [CHARITY TO CONFIRM: the disclaimer wording on participant and parent consent forms for day trips will be reviewed in light of clause 16.11 and the Unfair Contract Terms Act 1977 (Part II), which means a signed disclaimer neither removes the charity's duty of care nor substitutes for public liability insurance]

Important: These are draft outputs from a Charity Compliance Engine advisory session. They require trustee review, adaptation to your specific circumstances, and formal board approval before adoption. They do not constitute legal advice. Independent professional advice should be sought for complex or high-risk areas.

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A DIAGRAM FROM THIS POLICY

Safer recruitment

Shown in full. In the policy it sits beside the text it supports.

PROCESS FLOW **Safer Recruitment: From Role Definition to Start**

Safer recruitment is not just about disclosure checks. It is a structured process designed to deter unsuitable applicants, identify concerns early, and ensure every person in a role has been properly assessed. Every step is scaled to the role: for most volunteer roles it is a short, welcoming process, and many roles need no disclosure check at all.

1. **Define the role**
   Write a clear role description before advertising. It states whether the role involves contact with children or adults who may be at risk and whether it is a regulated role, and so what level of disclosure it needs: PVG scheme membership, a Level 1 or Level 2 disclosure, or none. Include the organisation's values and any faith or ethos requirements where these are lawful and proportionate.

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2. **Advertise openly**
   Advertise the role in a way that is accessible and does not unlawfully deter applicants on grounds of a protected characteristic. Provide applicants with the role description, the organisation's safeguarding policy, and information about the checks that will be carried out. Transparency at this stage deters unsuitable applicants.

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3. **Application and interview**
   Collect a completed application or expression of interest. For staff, hold an interview; for volunteers, a conversation, not an interview, with no probation period. Use it to explore values, motivations, and any gaps in history. Assess suitability for the specific role and the organisation's ethos, not just capability.

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4. **References**
   Take references, through a clear process, for any role involving children or adults who may be at risk, scaled to the role, and review them before the person begins. For paid posts in a registered care service the standard is two professional references, one from the current or most recent employer. Do not accept references from family members or personal friends.

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5. **Previous convictions, and trustees**
   Asking applicants to declare convictions themselves is optional; where the charity asks, it explains what must legally be disclosed. A conviction does not automatically bar someone: it is assessed fairly against the role. **Trustees and senior managers** are different: before they start, search OSCR's Record of Removed Persons and take a signed declaration against the automatic disqualification criteria. A possible match pauses the appointment; a disqualified person cannot serve without an OSCR waiver.

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6. **Disclosure check**
   The type of check depends on whether the role is a regulated role under the Protection of Vulnerable Groups (Scotland) Act 2007 as amended by the Disclosure (Scotland) Act 2020. Before any application, see and verify documentary evidence of identity (a previous disclosure is not evidence of identity) and keep a note of the check. Most small charities apply through an umbrella body; Volunteer Scotland Disclosure Services is free for qualifying voluntary organisations.

   Regulated role
   PVG scheme membership required. Submit via Disclosure Scotland before the person begins their role. Do not allow the person to start until membership is confirmed. No exceptions.

   Non-regulated role
   PVG is not required. Decide whether the role needs a Level 1 or Level 2 disclosure, or none, and record the decision.

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7. **Induction and ongoing oversight**
   Provide a structured induction before the person begins. Induction must cover the safeguarding policy, code of conduct, reporting procedures, and role-specific requirements. Safer recruitment does not end at appointment: maintain regular supervision, create a culture where concerns can be raised, track PVG renewal dates, and remember the duty to refer to Disclosure Scotland (see the referral policy).

Record keeping: Keep a recruitment file for every appointment, including the role description, application, references, the identity check and the disclosure check outcome. Disclosure information is used only for the decision, never copied, and destroyed once the decision is made: record only whether it was satisfactory.

Source: Protection of Vulnerable Groups (Scotland) Act 2007 · Disclosure (Scotland) Act 2020 · Equality Act 2010 · Disclosure Scotland Code of Practice (2025) and mygov.scot · OSCR Record of Removed Persons · Volunteer Scotland safer recruitment resources (volunteerscotland.net)