

# Safeguarding of Children, Young People and Adults at Risk

## Guidance Document for SWI Federations and Institutes

### 1. Introduction to this Guidance Document

The Scottish Women's Institutes SCIO (SC053058) (**SWI**) is committed to ensuring the safety and wellbeing of all individuals who engage with its activities, including children, young people, and adults at risk.

SWI is currently made up of 28 Federations, which are unincorporated charities which operate regionally across Scotland. Each Federation is composed of multiple local Institutes, which are unincorporated community groups of members who operate locally.

This guidance document sets out the principles, responsibilities, and procedures that SWI expects Federations and Institutes to consider within their own safeguarding policies and child protection policies, specific to such Federation (or Institute).

This guidance document also sets out the notification requirements to SWI when a Federation or Institute becomes aware of any allegation or incident related to safeguarding or child protection.

This guidance document may be reviewed and amended at any time by SWI. This document is reviewed at least annually.

This document does not constitute legal advice and includes some general guidance only. If you are unsure of how to proceed, we recommend that you seek independent legal advice.

The following **definitions** are used in this guidance document:

**applicable laws** means all legislation, statutory guidance, and regulatory requirements governing the safeguarding of children, young people and adults at risk in Scotland, including but not limited to:

- The Children and Young People (Scotland) Act 2014
- The Adult Support and Protection (Scotland) Act 2007
- The Protection of Vulnerable Groups (Scotland) Act 2007
- The Data Protection Act 2018 and UK GDPR
- Charities and Trustee Investment (Scotland) Act 2005
- OSCR Safeguarding Guidance for Charities (2025)
- National Guidance for Child Protection in Scotland (2023)
- Getting it right for every child (GIRFEC) (Scottish Government)

**children and young people** or **child/young person** means individuals under the age of 18.

**adults at risk** means individuals aged 18 or over who may be unable to safeguard their own wellbeing, property, rights or other interests because of disability, age, illness, or social circumstances.

**safeguarding** means actions taken to promote the welfare of children and young people and adults at risk and protect them from harm. Such practices include actions to protect such

individuals from harm including physical, emotional, sexual and financial harm and neglect. This includes making sure appropriate policies, practices and procedures are put in place.

**child protection** is part of a safeguarding process and focuses on protecting individual children identified as suffering, or likely to suffer, significant harm. This includes child protection procedures detailing how to respond to concerns about a child.

**abuse** means any form of maltreatment which causes harm, or places Children and Young People or Adults at Risk at risk of harm. Abuse can be intentional or due to neglect, and it can occur within families, peer groups, online environments, intimate relationships, communities or organisational settings. Abuse may be a single incident or pattern of repeated behaviour.

**exploitation** means the use of power, control, manipulation or coercion to take advantage of Children and Young People or Adults at Risk for personal or financial gain.

## 2. Reporting concerns to SWI

As the parent body, SWI must be informed of any safeguarding concern or child protection concern at a Federation or Institute that:

- Has been referred to external authorities.
- Involves allegations against staff, volunteers or trustees of the Federation or Institute.
- Has the potential to impact the reputation, operations or legal obligations of SWI or those in the SWI group (including without limitation, any Federation or Institute).

Notification to SWI should be made as soon as reasonably practicable, and in any case within 24 hours of the concern being raised.

Information shared with SWI shall:

- Respect all confidentiality of individuals involved in the concern and comply with UK data protection legislation and avoid all personal data where possible.
- Contain anonymised detail of the concern sufficient for SWI to provide oversight and support.

The relevant Federation must provide regular updates to SWI in relation to:

- The progress of investigations.
- Any internal actions taken.
- Outcomes from the investigation.

Throughout the process, SWI may provide advice and governance oversight, or additional support where required. However, such advice and oversight shall not replace the Federation's or Institute's responsibilities as an independent charity and acting as the first responder in the Safeguarding process.

## 3. Safeguarding and child protection frameworks and policies

Charities working with children/young persons and/or adults at risk must do all they can to keep these beneficiaries safe and protected from harm.

SWI believes that everyone has the right to live free from abuse, harm and neglect. We recognise and expect all Federations and Institutes to recognise the responsibility to safeguard

the welfare of children and young people and adults at risk by providing a safe, supportive, and inclusive environment.

Therefore, SWI expects and requires that all of its Federations and Institutes to implement a safeguarding and child protection framework and to keep the relevant frameworks (including policies thereunder) under review. We provide more detail on what is expected of "frameworks" below. Federations are responsible for ensuring that its Institutes have frameworks in place.

When implementing a framework, please consider the following:

1. **Review and assess safeguarding risks** through risk assessments. These should be considered and updated regularly.
2. Have **adequate safeguarding policies and procedures** appropriate for your activities.
  - a. **Annex 1 includes a template style policy that you can use.** Please amend this template as appropriate for your Federation or Institute.
  - b. Keep these policies and procedures under review, particularly where there are changes in circumstances or activities. We recommend reviewing these regularly (perhaps annually).
  - c. Ensure that these procedures include escalation to SWI in accordance with the terms of this guidance document.
3. Federations and Institutes must consider appropriate safeguarding training for all relevant volunteers and trustees (and staff, where relevant).
  - a. Everyone who works with children/young people and adults at risk should understand the role they have in keeping these individuals safe. As such, Federation or Institute representatives who have a safeguarding role or responsibility should have training to help them carry out their duties.
  - b. Training will support Federation and Institute representatives in recognising the signs and indicators of abuse or exploitation.
  - c. Training should be part of the Federation and Institutes induction process for new volunteers and trustees (and staff, where applicable), and be regularly refreshed.
4. Consider appointing a **lead** with responsibility for safeguarding (the template policy assumes that you will appoint such a lead). The role of this lead is likely to include the following:
  - a. Providing advice and support on safeguarding.
  - b. Being the primary contact in relation to safeguarding concerns.
  - c. Promotion of safeguarding training within the Federation or Institute.
  - d. Receiving, recording and referring information to the appropriate authorities.
  - e. Supporting all volunteers (and where applicable, staff) to understand and follow safeguarding procedures.

- f. Ensuring records are maintained securely and in line with all applicable laws.
  - g. Reporting safeguarding incidents to SWI.
5. Have in place **safe recruitment processes**, and carry out appropriate checks in compliance with Disclosure and PVG requirements.
  6. Embed safeguarding and wellbeing in the **culture** of your Federation and Institute.
  7. Comply with the member **code of conduct**.
  8. Have a **reporting process** that is known to all your volunteers and trustees (and where relevant, staff). This should allow for whistleblowing procedures also, and ensure escalation to SWI. in accordance with the terms of this guidance document.
  9. Make sure all concerns reported are appropriately and sensitively **investigated and promptly acted on**.
  10. If incidents occur, **reflect and learn** from them.
  11. Federations and Institutes must only store any **personal data** obtained, including that which relates to children and young people and adults at risk, in accordance with UK data protection legislation. Any information shared shall only be shared in line with UK data protection legislation. Federations and Institutes must follow the principles of necessity, proportionality and lawfulness when sharing information.

There is more information on OSCR's website ([OSCR | Safeguarding guidance](#)) and the NSPCC's website ([Writing safeguarding policies and procedures | NSPCC Learning](#)).

## Annex 1 - Template Policy

# [INSERT NAME OF FEDERATION OR INSTITUTE]

## Policy on Safeguarding of Children, Young People and Adults at Risk

### 1. Introduction

The Scottish Women's Institutes SCIO (SC053058) (**SWI**) is committed to ensuring the safety and wellbeing of all individuals who engage with its activities, including children, young people, and adults at risk.

SWI is made up of 28 Federations, which are unincorporated charities which operate regionally across Scotland. Each Federation is composed of multiple local Institutes, which are unincorporated community groups of members who operate locally. In accordance with SWI requirements and the requirements of charity law and good governance, all Federations and Institutes must have a safeguarding policy in place.

This policy sets out the principles, responsibilities, and procedures designed to protect people from harm, abuse, and exploitation while participating in [INSERT NAME OF FEDERATION / INSTITUTE] ("**us**", "**our**", "**our organisation**") activities, whether in person or online.

This policy supports compliance with Scottish legislation and national safeguarding guidance.

This policy may be reviewed and amended at any time by us. This policy is reviewed annually by us or as suggested by the SWI from time to time.

### 2. Definitions

**applicable laws** means all legislation, statutory guidance, and regulatory requirements governing the safeguarding of children, young people and adults at risk in Scotland, including but not limited to:

- The Children and Young People (Scotland) Act 2014
- The Adult Support and Protection (Scotland) Act 2007
- The Protection of Vulnerable Groups (Scotland) Act 2007
- The Data Protection Act 2018 and UK GDPR
- Charities and Trustee Investment (Scotland) Act 2005
- OSCR Safeguarding Guidance for Charities (2025)
- National Guidance for Child Protection in Scotland (2023)
- Getting it right for every child (GIRFEC) (Scottish Government)

**children and young people** or **child/young person** means individuals under the age of 18.

**adults at risk** means individuals aged 18 or over who may be unable to safeguard their own wellbeing, property, rights or other interests because of disability, age, illness, or social circumstances.

**safeguarding** means actions taken to promote the welfare of children and young people and adults at risk and protect them from harm. Such practices include actions to protect such individuals from harm including physical, emotional, sexual and financial harm and neglect. This includes making sure appropriate policies, practices and procedures are put in place.

**child protection** is part of a safeguarding process and focuses on protecting individual children identified as suffering, or likely to suffer, significant harm. This includes child protection procedures detailing how to respond to concerns about a child.

**abuse** means any form of maltreatment which causes harm, or places children and young people or adults at risk at risk of harm. Abuse can be intentional or due to neglect, and it can occur within families, peer groups, online environments, intimate relationships, communities or organisational settings. Abuse may be a single incident or pattern of repeated behaviour.

**exploitation** means the use of power, control, manipulation or coercion to take advantage of Children and Young People or Adults at Risk for personal or financial gain.

### 3. Policy Statement and Scope

This policy applies to everyone who interacts with us (referred to as "**representatives**" in this policy), including:

- Our staff (if applicable) - whether full-time, part-time, permanent staff and those on fixed-term contracts.
- Our Board.
- Our volunteers.
- Our members.
- Our third party suppliers and contractors.

This policy should be read alongside the related policies and procedures that we have in place or have been provided by SWI, including policies related to data protection, anti-harassment and bullying, and the SWI Code of Conduct. **[DRAFTING NOTE: You may wish to amend this section to specifically refer to related policies in place]**

### 4. Understanding Wellbeing

Using the "getting it right for every child" (GIRFEC) principles, the approach to considering children's/young person's wellbeing should be rights-based, strengths-based, holistic and adaptable enough to take account of the stage of development and the complexity of child's/young person's individual life circumstances. In collaboration, with children and young people and their parent or guardian, we consider the following wellbeing indicators:

- **Safe** – an environment where a child/young person feels secure, nurtured, listened to and enabled to develop to their full potential. This includes freedom from Abuse or

neglect.

- **Healthy** – having the highest attainable standards of physical and mental health, access to suitable healthcare, and support in learning to make healthy and safe choices.
- **Achieving** – being supported and guided in learning and in the development of skills, confidence and self-esteem.
- **Nurtured** – growing, developing and being cared for in an environment which provides the physical and emotional security, compassion and warmth necessary for healthy growth and to develop resilience and a positive identity.
- **Active** – having opportunities to take part in activities such as play, recreation and sport, which contribute to healthy growth and development.
- **Respected** – being involved in and having their voices heard in decisions that affect their life, with support where appropriate.
- **Responsible** – having opportunities and encouragement to play active and responsible roles, and where necessary, having appropriate guidance and supervision.
- **Included** – having help to overcome inequalities and being accepted.

## 5. Roles and Responsibilities

The following section explains the different levels of responsibilities related to safeguarding and child protection within our organisation.

### 5.1 Our representatives

All individuals representing us or SWI in any way have a duty to promote safeguarding and child protection. Therefore, the responsibility for the effective implementation of this policy lies with all of our representatives.

All representatives should:

- Prioritise the wellbeing of children and young people and adults at risk at all times.
- Recognise and report any concern or allegation immediately, following reporting procedures set out below.
- Never investigate concerns themselves.
- Avoid actions which may place someone at further risk.
- Confirm in writing that you have read and understood this policy and cooperate with its processes.

This policy does not form part of any contract of employment. We may incorporate this policy into any contract to provide services with a third party.

Failure to comply with this policy may expose us, SWI and/or specific individuals to substantial damage including civil and criminal sanctions, regulatory enforcement, competitive disadvantage and/or reputational harm. Because of the importance of this policy, violations of this policy by employees or volunteers may result in disciplinary action, up to and including termination of employment, volunteering role or contract. If a service provider or contractor breaches this policy, they may have their contract terminated with immediate effect and without liability to us. If members breach this policy, then we may require to suspend or cancel membership.

## **5.2 Our Board**

Our Board holds the ultimate accountability for safeguarding across the organisation. Safeguarding is a regular item for discussion at board meetings.

Some of **the Board's** responsibilities include:

- Ensuring we comply with all applicable laws and guidance.
- Creating and overseeing a safeguarding culture embedded within our governance structure .
- Appointing a lead for safeguarding and child protection matters.
- Approval and monitoring of this policy.
- Liaising with the SWI on safeguarding and child protection matters as referred to in this policy.
- **Ensuring compliance with charity trustees duties in accordance with the Charities and Trustee Investment (Scotland) Act 2005.**
- Responding to serious incidents where required.

## **5.3 Safeguarding Leads**

***[DRAFTING NOTE: It would be good practice to appoint designated volunteers/staff to champion your safeguarding and child protection policy and to act as a contact point at member activities for raising concerns]***

We may appoint safeguarding lead(s) from time to time, who would be appointed by **[our Board]**. Safeguarding lead(s) must be staff or volunteers of our organisation.

Selected safeguarding lead(s) will be person(s) who are likely to be routinely in attendance at our member activities (particularly those which involve children and young persons or adults at risk) and who has a good understanding of this policy and its requirements.

Their duties include:

- Acting as the first point of contact for safeguarding concerns.
- Receiving, recording, and referring information to appropriate authorities.
- Supporting volunteers to understand and follow safeguarding procedures.
- Ensuring records are maintained securely and in line with legislation.
- Liaising with child protection and adult protection services as needed.

## 6. Our framework for safeguarding and protection

We believe that everyone has the right to live free from abuse, harm, and neglect. We recognise our responsibility to safeguard the welfare of children and young people and adults at risk by providing a safe, supportive, and inclusive environment.

We will seek to keep people safe by:

- Valuing, listening to, and respecting all participants.
- Appointing safeguarding lead(s).
- Adopting best practice in safeguarding policies and procedures.
- Providing training and support for staff (where applicable, volunteers and members).
- Recruiting staff (where applicable) and volunteers safely, ensuring PVG checks where appropriate.
- Reporting concerns promptly.
- Maintaining secure and confidential record keeping.
- Promoting equality, inclusion, and an anti-bullying culture.

Ensuring that we provide a safe physical environment by applying health and safety measures in accordance with the law and regulatory guidance.

### **6.1 Safer Recruitment**

We ensure that anyone working or volunteering with children and young people or adults at risk undergoes appropriate screening. We are committed to safe recruitment, selection and vetting.

Where we become aware that any current staff member (where applicable) or volunteer may pose a risk to children and young people and adults at risk it will comply with all applicable laws and any criminal record disclosure guidance in respect of referring that individual to the authorities, where appropriate.

#### **Disclosure Scotland/Protection of Vulnerable Groups (PVG)**

This includes Protection of Vulnerable Groups (PVG) checks through [Volunteer Scotland Disclosure Services](#). All PVG records are handled in compliance with data protection requirements.

Please note, Disclosure Scotland have recently made changes – always check the website for [updated guidance](#)

### **6.2 Code of Conduct and Training**

All staff (where applicable) and volunteers must read and sign SWI's Code of Conduct before they are recruited. When SWI updates the Code of Conduct, we repeat this process.

All our representatives shall ensure they:

- Comply with this policy.
- Never follow or connect with any child/young person on social media.
- Never contact any adults at risk for personal purposes (contact is permitted where required for purposes related to our organisation and as detailed in our privacy policy).
- Never enter into a relationship with a child/young person or adult at risk.
- Never engage in any abuse or exploitation.
- Never use inappropriate language.
- Never make sexually suggestive comments.
- Never provide any child/young person with personal contact details and never contact any child/young person for personal reasons.
- Never take pictures or films of child/young person or adult at risk on a personal device.

We will ensure that relevant representatives are adequately trained on this policy and safeguarding measures.

All our representatives must complete all mandatory training when requested by us, and failure to complete mandatory training may be treated by us as a breach of this policy.

### **6.3 Creating a Welcoming and Safe Environment**

We will ensure:

- All children and young people and adults at risk are treated with respect and dignity.
- We do not tolerate bullying, harassment, or discrimination in any form. We promote equality, diversity, and inclusion across all activities.
- All environments are safe, comfortable and private where necessary with risk assessments being completed for all activities, considering accessibility, health and safety, and safeguarding risks. (See attached event risk assessment template).
- All our staff and volunteers will avoid unnecessary contact with children and young people.
- All children and young people are provided with appropriate supervision with appropriate adult-to-participant ratios being maintained.
- Relevant emergency contact details are obtained from children and young people and adults at risk.
- Any relevant medical information has been obtained, and suitable arrangements have been made to accommodate the child/young person and adults at risk.

### **6.4 Personal Data and Images**

- We store and use any data obtained, including that which relates to children and young people and adults at risk, in accordance with this policy and UK data protection legislation.
- Any information shared shall only be shared in line with UK data protection legislation.
- We shall maintain secure, accurate and timely records of child protection concerns and actions taken in accordance with all applicable laws.
- Written consent must be obtained before taking or using photographs or videos of children and young people or adults at risk.

- Images must be respectful, appropriate, securely stored, and not accompanied by unnecessary personal information.
- When children themselves, parents, carers or spectators are taking photographs or filming at our events and the images are for personal use, we will publish guidance about image sharing before the start of the event.

## 7. Responding to Concerns and Allegations

### 7.1 Disclosure and response

Incidents resulting in safeguarding concerns or child protection concerns may be raised by anyone (including but not limited to all personnel, child/young person or an adult at risk). If someone tells you that they are subject to abuse or exploitation, or you suspect there might be a concern:

- Always stop and listen straight away, ensure they understand you take the allegation seriously.
- Encourage the individual to talk, but do not ask leading questions, interrupt or ask the individual to repeat themselves. It is **NOT** your responsibility to investigate suspected cases.
- Never promise that you will keep what is said confidential or secret - explain that if you are told something important you will only tell the people who need to know.
- Record what you have been told accurately and as soon as possible. Use the child/young person or adult at risk's own words if possible. Make a note of the time, location, whether anyone else present.
- Do not confront the alleged abuser or perpetrator.
- Report your concerns immediately in accordance with section 7.2. DO NOT worry that you might be mistaken; you have a responsibility to pass on your concerns following a disclosure. Never think abuse is impossible, or that the accusation is bound to be wrong.

### 7.2 How to report concerns

**[DRAFTING NOTE: Please amend this section to align with your expected reporting procedures]**

If you see or suspect abuse or exploitation, you must report such concerns.

- **When to report?** Immediately. Do not delay.
- **Who to report to?**
  - **If there is immediate risk of harm:** If an individual is believed to be at immediate risk of harm, the appropriate authorities (police/medical/social services) should be contacted as soon as the risk occurs. Please also inform the safeguarding lead.
  - **If there is no immediate risk of harm:** The safeguarding lead. If the allegation is against the safeguarding lead or the safeguarding lead is unavailable, then the information should be reported to [INSERT OTHER ROLE].

- **How to report?** Concerns should be recorded factually and submitted to the safeguarding lead in person, or by phone call, or through use of a secure written reporting channel (e.g. encrypted email).
- **What to report?** The reporting individual should include details such as:
  - The nature of the concern.
  - Date, time and place of the incident or disclosure.
  - Exact wording used by child/young person or adult at risk.
  - Name and roles of those involved.
  - Actions taken so far.

### **7.3 Internal Process**

Within 24 hours of receiving a concern, the safeguarding lead (or where applicable [OTHER ROLE]) is responsible for:

- Reviewing the concern.
- Whoever is the subject of the allegation they should be required to stop any activity they are doing until an investigation has been completed.
- Consulting with the relevant external authorities where required.
- Making decisions on next steps.
- Recording all actions taken.
- Subject to the reporting requirements outlined at section 7.4 below, informing our [Board/Federation] of the concern.
- Considering whether any other parties need to be informed (for example, grant providers).

The exact process of the investigation will be determined by the safeguarding lead or where applicable [OTHER ROLE] with reference to the nature of the incident.

### **7.4 Reporting to SWI**

**[DRAFTING NOTE: This section 7.4 aligns with SWI's expectations and should not be amended]**

As the parent body, SWI must be informed of any safeguarding concern or child protection at our organisation that:

- Has been referred to external authorities.
- Involves allegations against our staff, our volunteers and/or our trustees.
- Has the potential to impact the reputation, operations or legal obligations of the organisation, of SWI or those within the SWI group (for example, other Federations and Institutes).

Notification to SWI should be made as soon as reasonably practicable, and in any case within 24 hours of the concern being raised.

Information shared with SWI shall:

- Respect all confidentiality of individuals involved in the concern and comply with UK data protection legislation and avoid all personal data where possible.
- Contain anonymised detail of the concern sufficient for SWI to provide oversight and support.

The Federation must provide regular updates to SWI in relation to:

- The progress of investigations.
- Any internal actions taken.
- Outcomes from the investigation.

Throughout the process, SWI may provide advice and governance oversight, or additional support where required. However, such advice and oversight shall not replace our responsibilities as an independent charity and acting as the first responder in the safeguarding process.

### **7.5 Whistleblowing**

We encourage a culture of openness and accountability. Anybody who believes safeguarding procedures are not being followed can raise concerns with the safeguarding lead or directly contact the NSPCC Whistleblowing Advice Line on 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## **8. Policy Acknowledgement**

I, \_\_\_\_\_ of \_\_\_\_\_ **[INSERT NAME OF FEDERATION / INSTITUTE]**, confirm that

I have read and understood this policy, and agree to follow its principles and procedures.

Signature:

Date:

Name:

Telephone: