UPPERTUNITY

CREATING OPPORTUNITIES
BUILDING COMMUNITIES

Organisational Handbook



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1. About Uppertunity

1. Our Mission: What We Aim to Do

1. Foster Empowerment and Belonging

Support individuals with additional support needs and those who feel marginalised to feel empowered, valued, and connected to their community.

2. Promote Growth and Resilience

Encourage individuals to develop thriving mindsets, transferable life skills, confidence, and resilience through curiosity, playfulness, and exploration.

3. Challenge Perceptions

Shift negative perceptions of self and others, fostering open-mindedness and breaking down barriers of misunderstanding.

4. Build Sustainable Communities

Create social, economic, and environmental sustainability by engaging communities in partnership, education, and practical action.

5. Encourage Connection and Collaboration

Develop meaningful partnerships and connections to overcome isolation, learn from one another, and cultivate togetherness.

2. Our Values: How We Work

1. Creativity

Creativity engages the mind, enables broader thinking, and connects us to hidden parts of ourselves. We explore creativity through art, cooking, gardening, and playful activities that inspire new ideas and problem-solving.

2. Empowerment

We work with individuals, not for them. By fostering mutual respect and encouraging ownership, we help individuals build confidence and lead fulfilling lives.

3. Mindset

We advocate for progress, not perfection. It's about the journey. Through exploration, learning, and curiosity, we help individuals develop resilience and shift their focus to possibilities, not limitations.

4. Togetherness

True change happens collectively. We inspire community action, partnership, and collaboration to build stronger, more inclusive connections.

5. Sustainability

We aim to create a sustainable future through social, economic, and environmental practices, including creative waste reduction, awareness raising, and partnership working.

2. Our Culture

1. How We Work With Each Other: The Culture of Uppertunity

At Uppertunity, we strive to create a positive, inclusive, and empowering environment for all staff, clients, volunteers, board members, support staff, and visitors. Our culture is shaped by the following principles:

1. Appreciation and Celebration

- Value everyone's contributions equally.
- Acknowledge achievements and celebrate successes, big or small.
- Verbally recognise and celebrate each person's efforts, regularly.

2. Non-Judgmental Support

- Assume the best in each other and create a safe space to ask for help.
- Avoid judgment and negativity; instead, foster kindness and encouragement.
- See the best in everyone, respecting their journey and abilities.

3. Respect and Fairness

- Respect and value diverse backgrounds, abilities, and identities.
- Treat everyone with fairness. No favouritism, only equity.

4. Playfulness and Creativity

- Encourage humour, curiosity, and experimentation.
- Provide opportunities for creative expression and new ideas.
- Foster a safe space where individuals can showcase their talents.

5. Growth Mindset and Learning

- Embrace progress over perfection.
- Use mistakes as opportunities to learn and grow.
- Support safe risk-taking and encourage stepping outside comfort zones.

6. Communication and Honesty

- Communicate openly. Share knowledge, ask for help, and clarify expectations.
- Check in regularly and give constructive feedback.
- Listen actively and with empathy, asking follow-up questions to show care.

7. Collaboration and Teamwork

- Promote teamwork and inclusivity over competition.
- Share ideas, support each other, and work together to achieve common goals.
- Build a calm and fun environment where everyone feels they belong.

8. Accountability and Trust

- Take ownership of actions and be honest about successes and mistakes.
- Assume good intentions and practice authenticity in every interaction.
- Follow through on commitments and encourage continuous learning.

9. Empowerment

- Guide and support rather than doing things for others.
- Believe in everyone's potential and create opportunities for independence.

10. Adaptability and Flexibility

- Be open to new ideas and willing to adjust for the benefit of everyone.
- Check in regularly to ensure processes are working effectively.

2. How We Behave as Individuals: Being a Great Facilitator

To effectively support adults with additional support needs and empower them, facilitators at Uppertunity embody the following behaviours:

1. Be a Role Model

- Demonstrate positive behaviour in attitude, language, and actions.
- Show respect, kindness, and healthy habits to inspire confidence and trust.
- Is the behaviour you show or what you're talking about helpful to you, or helpful to the person? It should be helpful to the person.

2. Show Initiative

- Be proactive, offer help and stay engaged during activities.
- Check in with members and join in creatively when possible.
- See where things can improve, and share ideas.

3. Build Confidence and Empower

- Provide specific, meaningful compliments that highlight individual strengths.
- Empower individuals to take ownership of their learning and experiences.
- Focus on personal growth, not perfection.

4. Listen and Communicate with Care

- Be empathetic, listen without judgment and offer support.
- Match body language and tone to create equality, not hierarchy.
- Explain things clearly and adapt communication to meet individual needs.

5. Foster Fun and Balance

- Create a safe and engaging atmosphere with enthusiasm and positivity.
- Balance fun with purpose. Focus on the journey, not just the destination.

6. Ensure Safety and Professionalism

- Be aware of safeguarding responsibilities and report concerns.
- Maintain professional boundaries, keeping physical contact to a minimum and no private communication outside of the workspace with clients.
- Share updates with the team to keep everyone informed.

7. Be Prepared and On Time

- Know your responsibilities for workshops, events, and activities.
- Stay informed about Uppertunity's plans and ensure readiness.

8. Practice Kindness and Boundaries

- Be nurturing yet professional. Balance kindness with clear boundaries.
- Respect others' needs, and create space for learning and growth.

9. Share and Collaborate

- Share knowledge, resources, and skills with others.
- Teach and learn from team members and volunteers.

10. Create a Positive Team Environment

- Support colleagues and volunteers by noticing and addressing struggles.
- Practice gratitude and show appreciation for others' efforts.
- Make space for individuals to be themselves and feel valued.

3. Code of Conduct

Creating a safe, respectful, and positive environment for everyone At Uppertunity, we believe in leading with kindness, professionalism, and curiosity. Our Code of Conduct helps us maintain a safe, supportive space where everyone — staff, volunteers, placements, and members — can thrive.

This policy applies to:

- All paid staff, volunteers, and trustees
- Contractors and placement students
- Any person acting as a representative of Uppertunity in any capacity

Key guidelines:

All conduct at Uppertunity should reflect our mission, values, and culture, as outlined in the Organisational Handbook. In particular, representatives are expected to:

- Treat everyone with dignity, respect, and kindness.
- Support inclusion and equity, valuing diverse backgrounds, experiences, and identities.
- Foster empowerment, encouraging independence and personal growth.
- Maintain professionalism, honesty, and accountability at all times.
- Promote a safe, positive, and collaborative environment.

1. Respect and Inclusion

- Treat everyone with kindness, dignity, and respect.
- Celebrate differences, we all bring unique experiences, skills, and perspectives.
- Use inclusive language and behaviour at all times.
- Never use offensive, discriminatory, or intimidating language or actions.

2. Confidentiality and Boundaries

- Keep all personal information about members, staff, and volunteers private.
- Never share photos, stories, or information outside of work unless you have permission.
- Avoid discussing members or internal matters in public or on social media.
- Maintain professional boundaries. Friendships are encouraged, but roles and responsibilities come first.

3. Dress and Presentation

- Dress comfortably, appropriately, and in a way that reflects respect for the people you work with.
- For workshops and catering: wear practical clothing and closed shoes for safety.
- Avoid clothing with offensive images or slogans.
- No low-cut tops, short skirts or shorts, or midriffs showing.
- When representing Uppertunity externally, aim for smart-casual or as directed for the event.

4. Professionalism and Responsibility

- Be punctual, reliable, and communicate if you're running late or can't attend.
- Follow instructions, health and safety procedures, and safeguarding guidance.
- Be proactive, if something doesn't feel right or you're unsure, ask.
- Take care of equipment, materials, and shared spaces.
- Be mindful of confidentiality and data protection when handling paperwork or digital information.

5. Photography and Social Media

- All members must give consent before any photos or videos are taken.
- Only staff are permitted to take photos of members and share them within the staff group chat for internal use.
- Photos must never be shared on personal social media, messaging apps, or with anyone outside of the team.

- You are welcome — and encouraged — to share Uppertunity's posts from our official social media pages to help promote our work.
- Always be professional, positive, and respectful when posting or talking about Uppertunity online.
- If you're ever unsure whether a photo or post is appropriate, check with a manager before sharing.
- Act as an ambassador for Uppertunity in the community and online.
- Avoid actions or statements that could bring the organisation into disrepute.

6. Safety and Common Sense

- Everyone has a role in keeping Uppertunity safe, for yourself, our members, and each other.
- Always follow health and safety guidance, listen to staff instructions, and use equipment safely.
- If something feels unsafe or you're unsure how to do something, stop and ask — never take risks or "just wing it."
- Report accidents, hazards, or near misses straight away so we can prevent future issues.
- Respect personal space and be mindful of others' needs, physical and emotional safety both matter here.

7. Attitude and Mindset

- Approach every day with curiosity, compassion, and a willingness to learn.
- Be open to feedback and reflection, we all grow together.
- Support others and ask for help when you need it.
- Be part of building a positive and nurturing culture for everyone.

8. Safeguarding and Reporting

- If you experience or witness inappropriate behaviour, bullying, harassment, or safeguarding concerns, speak up.
- Report concerns to your line manager or the Designated Safeguarding Lead (Catrin Evans).
- Everyone will be treated fairly, confidentially, and with respect during any follow-up.

9. Prohibited Behaviour

The following behaviours are not acceptable and may result in disciplinary action:

- Harassment, bullying, or discriminatory conduct.
- Verbal, physical, or emotional abuse.
- Breach of confidentiality or data protection.
- Being under the influence of alcohol or illegal substances while representing Uppertunity.
- Theft, fraud, or misuse of organisational property.
- Serious breach of safeguarding procedures.

Our Shared Commitment:

Together, we are developing skills, nurturing connections, and inspiring mindsets for thriving communities - safely, respectfully, and collaboratively.

4. Data Processing and Protection Policy

1. Policy Details

1.1. This document provides guidance for processing personal data in accordance with the principles and legal obligations outlined in the Data Protection Act (2018), General Data Protection Regulation (GDPR), and the common law duty of confidentiality. It explains how Uppertunity complies with best practices for information handling.
1.2. Uppertunity is committed to safeguarding personal information by ensuring transparency, accountability, and security in data collection, processing, and storage. All individuals involved in the organisation will be informed of their rights regarding their data.
1.3. All paid and unpaid staff must ensure Uppertunity meets its legal responsibilities regarding confidentiality, including Disclosure Scotland Checks, GDPR, and relevant human rights legislation that guarantees privacy.
1.4. Uppertunity abides by the six GDPR principles:

- **Lawfulness, fairness, and transparency**: Personal data is processed lawfully and in a transparent manner.
- **Purpose limitation**: Data is collected for specified, explicit, and legitimate purposes.
- **Data minimisation**: Only necessary and relevant data is processed.
- **Accuracy**: Personal data is kept accurate and up to date.
- **Storage limitation**: Data is retained only for as long as necessary.
- **Integrity and confidentiality**: Data is processed securely to prevent unauthorised access, loss, or damage.

1.5. The Board of Directors will review this policy regularly to ensure continued compliance and awareness of responsibilities.

2. Collection of Personal Information

2.1. Uppertunity collects and processes the following personal information:

- Contact details for clients, carers, staff, students, volunteers, and trustees.
- Emergency contact details for staff, students, volunteers, and clients.
- Disabilities or medical needs relevant to roles or group activities.
- Employment history of staff.
- Driving licenses and history for staff and volunteers driving for business purposes.
- References for staff and volunteers.
- Criminal record information where relevant to roles (Disclosure Scotland checks).

2.2. Data is collected via email, secure online forms, or paper forms designed by Uppertunity. All forms state the purpose of data collection and inform individuals of their right to have their data removed.
2.3. A record of processing activities is maintained, detailing the data held and access permissions. The manager oversees updates to this register.

3. Consent Management

3.1. Uppertunity ensures compliance with the following consent principles:

- Consent is used as a lawful basis for processing where appropriate.
- Consent is clearly separated from terms and conditions.
- Individuals must positively opt in (no pre-ticked boxes).
- Clear and plain language is used.
- Individuals can provide granular consent for different types of processing.
- Any third-party reliance on consent will be specified.
- Individuals can refuse or withdraw consent without detriment.

3.2. If an individual lacks capacity to provide consent, the legal guardian's consent will be required.
3.3. Where written consent is impractical (e.g., verbal agreements for media use), individuals will be informed of how their data is used, and only minimal data (e.g., first name, photos, or videos) will be processed.

4. Storage and Access

4.1. Personal information in paper form is stored securely in lockable, non-portable cabinets in designated rooms. Access is controlled by management.
4.2. Digital data is stored on Google Drive and our HR/H&S system is protected through:

- Password-protected systems with access limited to relevant staff.
- Secure storage of business devices (phones, tablets, laptops) with encryption where applicable.

4.3. The manager regularly reviews who has access to what data and ensures security protocols are followed.

5. Sharing of Information

5.1. Personal data is shared only on a need-to-know basis. Any disclosure requires the consent of the individual unless required by law or necessary for safety reasons.
5.2. Staff and volunteers must not discuss or disclose personal data outside necessary operational requirements. This is covered in induction training.
5.3. Information shared with supervisors or managers remains confidential unless the individual consents to further sharing.

6. Retention and Disposal

6.1. Personal data is retained only for as long as necessary:

- Employee and board member records are kept for **7 years** post-employment in line with HMRC requirements.
- Client records are kept for **6 months** after service provision ends.

6.2. Data is securely disposed of:

- Paper documents are shredded by a certified company, "Let's Talk Shred," which provides GDPR-compliant destruction certificates.
- Electronic records are permanently deleted, including emptying online recycle bins.

7. Data Breach Management

7.1. Any suspected or confirmed data breach must be reported to the Data Protection Officer (Manager) immediately.
7.2. Breach response includes:

- Containment and assessment of the breach.
- Notification of affected individuals and relevant authorities within **72 hours**, if required.
- Investigation and corrective measures to prevent recurrence.

8. Data Subject Rights

8.1. Individuals have rights under GDPR, including:

- **Access**: Request a copy of their personal data.
- **Rectification**: Correct inaccurate or incomplete data.
- **Erasure**: Request deletion of data ("right to be forgotten").
- **Restriction**: Limit data processing in certain circumstances.
- **Portability**: Obtain and reuse personal data across services.
- **Objection**: Challenge data processing for legitimate interests.

8.2. Requests to exercise these rights should be submitted to Uppertunity's data protection contact.

9. Training and Compliance

9.1. All staff and volunteers (If required) receive training on data protection responsibilities during induction and through regular refresher sessions.

9.2. Staff with specific data handling duties (e.g., marketing, IT security) receive specialist training.

10. Compliance Monitoring

10.1. Uppertunity will:

- Regularly audit data processing activities.
- Ensure continuous improvement of security measures.
- Review and update this policy annually or when significant changes occur in data protection law.

10.2. Non-compliance with this policy may result in disciplinary action.

This policy ensures that Uppertunity complies with legal requirements, protects the rights of individuals, and maintains high standards of data security and privacy.

5. Safeguarding Vulnerable Adults and Children & Disclosures Policy

1. Policy Overview

1.1 Statement

As a provider of regulated roles, Uppertunity has a legal duty to safeguard children and protected adults and, where required, to refer individuals to Disclosure Scotland. This policy reflects the Protection of Vulnerable Groups (Scotland) Act 2007 and the Disclosure (Scotland) Act 2020, including current requirements around regulated roles, PVG scheme membership, ongoing monitoring and referrals.

1.2 Purpose

This policy sets out Uppertunity's commitment to preventing abuse and neglect, promoting rights and wellbeing, and responding effectively to concerns. It details the responsibilities of staff, volunteers, trustees and anyone acting on our behalf, and explains how we comply with Scottish law and national guidance.
Uppertunity primarily works with individuals with additional support needs aged 16 and over. Under Scottish child protection law, a child is anyone under 18; therefore, this policy covers both children (under 18) and protected adults.

1.3 Scope (Who this applies to)

This policy applies to:

- All employees, volunteers, trustees, contractors, placements, sessional workers and anyone otherwise engaged by or representing Uppertunity.
- Partner and commissioned organisations working with us while delivering services or activities on our behalf or on our premises.

Everyone covered by this policy must read, understand and follow it, and complete required training.

1.4 Legal and Guidance Framework (Scotland)

This policy is informed by and should be read alongside:

- Protection of Vulnerable Groups (Scotland) Act 2007 and the Disclosure (Scotland) Act 2020 (regulated roles, PVG membership, vetting and referrals).
- Adult Support and Protection (Scotland) Act 2007 and relevant Code of Practice.
- National Guidance for Child Protection in Scotland and subsequent updates.
- Getting it Right for Every Child (GIRFEC) and the Children and Young People (Scotland) Act 2014.
- Human Rights Act 1998, Equality Act 2010, Data Protection Act 2018 and UK GDPR.
- Disclosure Scotland Code of Practice and current Volunteer Scotland Disclosure Services (VSDS) guidance.
- Relevant regulatory guidance, including where applicable the Care Inspectorate, Scottish Social Services Council (SSSC), OSCR, NHS Scotland and local authority procedures.

1.5 Our Commitments

Uppertunity will:

- Create and maintain a safe, inclusive environment where harm, abuse, neglect, discrimination and exploitation are never tolerated.
- Recognise that 16-17-year-olds are children in law and apply child protection processes accordingly.
- Use safer recruitment, including PVG membership checks appropriate to regulated roles, and maintain robust induction, supervision and training.
- Ensure clear boundaries, professional conduct and a culture that encourages speaking up and whistleblowing.

- Respond promptly to concerns using the Respond - Report - Record - Refer - Support approach, and make referrals to social work, Police Scotland and/or Disclosure Scotland where thresholds are met.
- Meet the legal duty to refer to Disclosure Scotland when required.
- Handle disclosure information securely, lawfully and proportionately, in line with the Disclosure Scotland Code of Practice, UK GDPR and the Data Protection Act 2018.
- Assess and manage risk across activities, including staffing ratios and behaviour risk planning.
- Review and improve safeguarding practice through regular audits, learning reviews and annual policy review.

1.6 Expectations of Partners and Commissioned Organisations

Any organisation working with Uppertunity must have safeguarding policies and procedures that meet or exceed the standards in this policy and comply with Scottish law and guidance. Depending on the service, this may include requirements set by relevant regulators, commissioners and statutory bodies. Where work is delivered outside Scotland, the partner must also comply with relevant local frameworks in addition to this policy's standards.

1.7 Definitions

- Child: anyone under 18 years of age.
- Protected adult: a person who meets the statutory definition for protected adults within the PVG framework.
- Regulated role: a paid or unpaid role that meets the statutory criteria for regulated roles with children and/or protected adults.
- Designated Safeguarding Lead (DSL): the role appointed by Uppertunity to coordinate safeguarding practice and provide guidance on safeguarding concerns.
- Lead Signatory: the person authorised to lead Uppertunity's disclosure processes with VSDS/Disclosure Scotland.
- Additional Signatory: an authorised person who can carry out disclosure-related functions on behalf of Uppertunity within the permissions given to them.

1.8 Safeguarding and Disclosure Responsibilities

Uppertunity assigns safeguarding and disclosure responsibilities by role rather than naming individuals within this policy. A current internal record of role-holders and authorised signatories will be maintained.

- The Designated Safeguarding Lead (DSL) oversees safeguarding practice, provides staff guidance, coordinates responses to concerns, and liaises with statutory agencies.
- The Lead Signatory oversees the organisation's disclosure application arrangements and ensures compliance with VSDS and Disclosure Scotland requirements.
- Authorised Additional Signatories may process disclosure applications and access disclosure information only where this is necessary for their authorised role and in line with Sub-policy 1.
- The Manager and/or another appointed senior role-holder will ensure recruitment decisions, safeguarding actions and referrals are progressed appropriately. The same person may hold more than one of these roles where this is appropriate and authorised.
- The Board of Trustees retains ultimate governance responsibility. A designated trustee will provide oversight of safeguarding and disclosure compliance.

- Where a concern involves the DSL, Lead Signatory, Manager or another senior role-holder, the matter must be escalated to the Chair or another uninvolved trustee so that decisions are made independently.

1.9 Policy Location and Access

This policy is available on Uppertunity's website and/or internal HR/Health & Safety system accessible to staff and volunteers. Printed copies and accessible formats are available on request.

1.10 Key Objectives

- Clarify roles, responsibilities and accountability for safeguarding across Uppertunity.
- Ensure PVG membership and safer recruitment are applied wherever required before a person carries out a regulated role.
- Provide clear procedures for responding to concerns, allegations and incidents, including referral pathways and PVG referral thresholds/timescales.
- Embed training, supervision and competence requirements for all roles, including enhanced training for those with safeguarding and disclosure responsibilities.
- Promote multi-agency working, proportionate risk management and lawful information sharing.
- Foster a speak-up culture where concerns are raised early and acted upon.

1.11 Core Principles

Uppertunity adopts six widely recognised safeguarding principles:

1. Empowerment - support informed decision-making and respect the person's views and wishes.
2. Prevention - act early to reduce risk and prevent harm.
3. Proportionality - take the least intrusive, appropriate response to the risk.
4. Protection - provide support and action for those at risk of harm.
5. Partnership - work with people and agencies to achieve the best outcomes.
6. Accountability - be transparent, evidence-based and open to scrutiny.

2. Recognising Abuse and Harm

2.1 Introduction

Safeguarding begins with recognising the different forms of abuse and harm that children, young people and protected adults may experience. Everyone involved with Uppertunity - staff, trustees and volunteers - must be alert to signs, symptoms and patterns of harm and take prompt action by following the reporting procedures in this policy.

Abuse can be a single incident or a pattern of repeated behaviour. It can be deliberate, reckless, or a result of negligence. It may occur in person, within organisations, online, or through wider systems and relationships.

Staff and volunteers must remember:

- It is not their role to investigate suspected abuse.
- Their duty is to recognise, record and report concerns to the Designated Safeguarding Lead (DSL) or, if that person is implicated or unavailable, to the appropriate senior role-holder/trustee.

2.2 Categories of Abuse

The following categories are drawn from national safeguarding guidance. Indicators are examples only and should be considered in context.

1. Physical Abuse

Deliberate physical harm such as hitting, shaking, poisoning, burning, scalding, drowning or suffocating. May also include fabricated or induced illness.
Possible indicators: Unexplained injuries, fear, flinching, reluctance to be touched.

2. Emotional / Psychological Abuse

Persistent emotional maltreatment, including threats, humiliation, bullying, intimidation, coercive control and undermining self-esteem.
Possible indicators: Withdrawal, low confidence, extreme compliance or aggression, marked behavioural change.

3. Sexual Abuse & Exploitation

Forcing or enticing a person into sexual activity, including contact and non-contact activity, grooming, sexualised online communication or exploitation.
Possible indicators: Inappropriate sexual knowledge, sudden behavioural changes, avoidance of particular individuals, unexplained physical symptoms.

4. Neglect

Persistent failure to meet basic physical, emotional or psychological needs, including food, shelter, clothing, supervision, medical care or emotional support.
Possible indicators: Poor hygiene, hunger, untreated conditions, frequent absence, developmental concerns.

5. Financial or Material Abuse (Protected Adults)

Theft, fraud, exploitation, pressure regarding money/property, or misuse or withholding of money or benefits.
Possible indicators: Unexplained loss of money or possessions, sudden inability to pay bills, lack of access to finances.

6. Discriminatory Abuse

Harassment, bullying or unfair treatment based on protected characteristics, including hate crime or degrading language.
Possible indicators: Withdrawal, reduced confidence, reluctance to engage, reports of derogatory language.

7. Organisational / Institutional Abuse

Poor professional practice, unsafe systems, neglectful routines, or cultures in which unsafe behaviour goes unchallenged.
Possible indicators: Lack of choice, unsafe environments, repeated poor standards, inappropriate restrictions.

8. Domestic Abuse

Coercive, controlling, threatening, degrading or violent behaviour between partners or family members.
Possible indicators: Fearful behaviour, reluctance to speak in front of a partner/family member, frequent absences, injuries with inconsistent explanations.

9. Self-Neglect (Protected Adults)

Behaviour that threatens personal health, safety or wellbeing, such as refusal of care, hoarding or unsafe living conditions. Possible indicators: Unsafe living environment, malnutrition, poor hygiene or refusal of essential treatment.

10. Other Emerging Forms of Harm

Includes cyber/online abuse, grooming, modern slavery/trafficking and radicalisation/extremism.
Possible indicators: Patterns will vary; concerns must be recorded and reported rather than investigated by staff or volunteers.

2.3 Key Messages for Staff and Volunteers

- Abuse can happen to anyone regardless of age, background or circumstance.
- Concerns should always be taken seriously, even if they seem minor.
- Do not delay: concerns must be passed to the DSL or appropriate alternative immediately.
- Record observations accurately, including dates, times and direct words where possible.
- If someone is in immediate danger, call 999.

3. The Protecting Vulnerable Groups (PVG) Scheme

3.1 Overview

The Protecting Vulnerable Groups (PVG) Scheme is Scotland's membership scheme for people carrying out regulated roles with children and/or protected adults. It is operated by Disclosure Scotland.

The PVG Scheme supports safer recruitment and ongoing safeguarding by checking relevant information and continuously monitoring scheme members while membership is active. Organisations providing regulated roles also

have legal responsibilities, including ensuring appropriate membership and making referrals in defined circumstances.

3.2 How the PVG Scheme Works

- Disclosure Scotland carries out relevant checks when an individual applies to join or makes a PVG scheme application.
- Disclosure results are made available to the applicant, who must share the result with the countersigning organisation through the current Disclosure Scotland process.
- During active membership, Disclosure Scotland may receive and assess new vetting information relevant to suitability.
- Where information calls suitability into question, Disclosure Scotland may consider whether an individual should be barred from regulated roles.
- Uppertunity must not allow a person to carry out a regulated role unless the required PVG scheme membership and disclosure requirements are satisfied.

3.3 Applying to the PVG Scheme

- Uppertunity initiates or countersigns disclosure applications through the current VSDS/Disclosure Scotland process.
- The individual completes their part of the process and provides the required identity information.
- The applicant must share the completed disclosure result with Uppertunity through the approved process.
- Uppertunity must receive and consider the appropriate disclosure result before the individual begins a regulated role.

3.4 Roles Covered by the PVG Scheme

Regulated roles may include certain roles involving caring for, teaching, training, instructing, supervising, providing personal assistance to, or exercising power or influence over children or protected adults. A role must be assessed against the current statutory criteria and guidance; contact alone does not automatically make every role regulated.

If there is uncertainty, Uppertunity will use current Disclosure Scotland regulated-role guidance and role-checking resources and seek advice where necessary.

3.5 Definitions

- Child: anyone under 18.
- Protected adult: as defined in current PVG legislation and guidance.

3.6 Being Barred (Listed)

Disclosure Scotland maintains barred lists for regulated roles with children and protected adults. An individual may be barred from one or both groups. It is a criminal offence for a barred person to seek, agree to or carry out a regulated role with the group from which they are barred, and organisations must not offer such a role to them.

3.7 Uppertunity's PVG Practice

All staff, volunteers and other individuals carrying out regulated roles must have the appropriate PVG scheme membership and disclosure result in place before beginning the regulated role.
If duties change, the role will be reassessed and any required PVG action completed before the new regulated duties begin.

PVG and disclosure records will be handled in accordance with Sub-policy 1: Secure Handling of Disclosure Information.

Membership status will be monitored and the organisation will respond to renewal notifications and transition arrangements in line with the five-year PVG membership framework and current Disclosure Scotland guidance.

Uppertunity will notify/remove its interest when an individual no longer carries out the relevant regulated role, where required by the current process.

4. Safe Recruitment & Role Assessment

4.1 Commitment to Safer Recruitment

Uppertunity is committed to robust and transparent recruitment procedures that protect children and protected adults from harm. Recruitment practices will comply with current PVG/disclosure legislation and recognised safer-recruitment guidance.

- Candidates will be assessed for skills and experience and for attitudes and values relevant to safeguarding.
- Recruitment procedures will be applied fairly and consistently, promoting equality, diversity and inclusion.

4.2 Role Assessment

Before recruitment begins, each paid, voluntary, trustee, placement or other relevant role will be assessed to determine whether it is a regulated role. The assessment will use current statutory criteria and Disclosure Scotland/VSDS guidance and will consider the activities involved, the nature of contact and any power or influence attached to the role.
Where a role is regulated, the appropriate PVG scheme membership and disclosure process will be required before the person carries out that role.

4.3 Recruitment Procedures

- Clear role descriptions outlining duties, safeguarding responsibilities and whether the role is regulated.
- An application process appropriate to the role.
- Structured interviews where appropriate, including safeguarding-related questions.
- At least two references where appropriate, including the most recent employer where applicable, with references verified.
- Identity, address and right-to-work checks where applicable.

4.4 PVG Scheme Membership

- Where a role is regulated, appropriate PVG membership is required before the person begins the regulated role.
- Uppertunity will use current VSDS/Disclosure Scotland application processes.
- Disclosure results will be reviewed only by authorised people and handled in line with Sub-policy 1.
- Membership must remain valid for the relevant workforce and will be monitored in line with current requirements.

4.5 Probation and Induction

- Staff and volunteers will receive induction appropriate to their role, including safeguarding responsibilities and procedures.
- During probation or an initial review period, performance, conduct and adherence to safeguarding standards will be monitored.
- Continued involvement is subject to satisfactory completion of required checks, induction and role expectations.

4.6 Ongoing Monitoring

- Staff and volunteers must promptly disclose information they are required to disclose under organisational policy or law, including relevant safeguarding concerns.
- PVG membership status and organisational interest will be kept appropriately up to date.
- Supervision and appraisal will include safeguarding responsibilities where relevant.

4.7 Record Keeping

- Recruitment and safeguarding records will be kept securely in line with data-protection requirements and organisational retention arrangements.
- Disclosure information itself will be handled, retained and destroyed/deleted in accordance with Sub-policy 1 and the Disclosure Scotland Code of Practice.
- Access will be restricted to authorised people with a legitimate need to know.

5. Training & Development

5.1 Commitment to Training

Uppertunity is committed to ensuring that staff, trustees and volunteers have the knowledge, skills and confidence to carry out their safeguarding responsibilities effectively. Training and professional development are mandatory where relevant and will be refreshed as required.

5.2 Safeguarding and Disclosure Training

- Staff and volunteers must complete safeguarding training during induction and any required declaration/acknowledgement.
- Safeguarding training will be refreshed regularly and when significant guidance or practice changes.
- The DSL and other relevant senior role-holders will undertake enhanced safeguarding training appropriate to their responsibilities.
- Lead and Additional Signatories must understand and follow VSDS/Disclosure Scotland requirements, including secure handling of disclosure information and the boundaries of their authorised role.
- Relevant managers/trustees involved in disciplinary or safeguarding decisions must understand the organisation's duty to refer.

5.3 Additional Mandatory Training for Paid Staff

- Health & Safety
- Mental Health Awareness
- Emergency First Aid
- Training will primarily be completed through Uppertunity's approved learning providers, supplemented with external training as appropriate.

5.4 Monitoring and Records

- Training completion will be recorded and monitored by management.
- Refresher schedules will be maintained.
- A person who has not completed mandatory training may be restricted from duties where this is necessary for safety or compliance.

5.5 Continuous Development

Training needs will be reviewed through supervision, appraisal, incident learning and policy review. Additional training may include equality and inclusion, trauma awareness, supporting people with learning disabilities, safer recruitment and disclosure/PVG practice.

6. Reporting Concerns and Referrals

6.1 Guiding Principles

All staff, trustees and volunteers share a duty to act promptly on safeguarding concerns. Concerns must be taken seriously, recorded accurately and referred through the appropriate channels. No one should attempt to investigate allegations themselves unless they are specifically authorised to conduct an organisational investigation. Uppertunity follows the Respond - Report - Record - Refer - Support approach.

6.2 Respond and Report

- Ensure the immediate safety of the child or protected adult.
- In an emergency, call 999. If not urgent but statutory support is required, contact the relevant social work or protection service.
- Seek consent from an adult to share information where appropriate, unless there is a lawful safeguarding reason to share without consent.
- Do not ask leading questions or carry out an informal investigation; record facts.
- Notify the DSL immediately, or an appropriate uninvolved senior role-holder/trustee if the DSL is implicated or unavailable.

6.3 Record

- Use the Safeguarding Incident Form or provide a full factual account.
- Record the person's exact words where possible.
- Date, time and sign/attribute all records.
- Keep safeguarding records confidential and secure.

6.4 Refer

The DSL or appropriate senior role-holder will determine safeguarding next steps and seek management/trustee or external advice where required. Relevant guardians, care managers, key workers or statutory agencies will be contacted where appropriate and lawful.

Concerns of significant or immediate harm may require referral to Police Scotland and/or the relevant local authority protection/social work service.

6.5 Support

Individuals involved will be offered appropriate emotional and practical support, including signposting or referral to external services where relevant.

Staff and volunteers raising concerns will be supported, and whistleblowing protections apply.

Key Contacts

Organisation / Service	Contact
Police Emergency	999
Police non-emergency	101
NHS 24	111
Dundee Council First Contact Team	01382 434019
Angus Council Access Line	03452 777778
Disclosure Scotland	0300 020 0040

6.6 Referrals to Disclosure Scotland

Uppertunity has a legal duty to make a referral to Disclosure Scotland when the statutory referral criteria are met. This duty may apply to employees and volunteers, whether or not the person is a PVG scheme member, and may continue even if relevant concerns come to light after the person has left the organisation.

Detailed organisational requirements are set out in Sub-policy 2: Making Referrals / Duty to Refer. The sub-policy forms part of this policy and must be followed whenever harmful behaviour or removal from a regulated role may trigger the legal duty.

6.7 Allegations Against Staff or Volunteers

Safeguarding allegations concerning staff or volunteers will be managed fairly, promptly and proportionately. Temporary suspension or restriction from duties may be used as a neutral risk-management measure where appropriate; it is not an assumption of guilt. The safety and welfare of children and protected adults will take priority while due process is maintained.

6.8 Allegations Against the DSL, Manager, Lead Signatory or Trustee

- If a concern involves the DSL, Manager or Lead Signatory, it must be reported directly to the Chair of the Board or another uninvolved designated trustee.
- If the concern involves a trustee, including the Chair, it must be reported to another uninvolved trustee, who should seek external safeguarding advice where appropriate.
- The person receiving the concern must ensure appropriate safeguarding action and consider whether the Disclosure Scotland referral threshold is met.
- Decisions about referral must not be controlled by a person who is the subject of the concern.

7. Confidentiality, Risk Management, and Managing Behaviour

7.1 Confidentiality & Information Sharing

- Personal information must be treated confidentially and shared only where there is a legitimate, lawful and proportionate reason.
- Safeguarding information may be shared without consent where necessary to protect a person from harm or meet a legal obligation.
- Records must be stored securely in line with Uppertunity's Data Protection Policy and relevant sub-policies in this document.
- Disclosure information has additional handling requirements set out in Sub-policy 1.

7.2 Risk Management and Ratios

- Activities involving children or protected adults must be risk assessed. Risk assessments are completed through Uppertunity's agreed Health & Safety arrangements.
- Staffing levels and ratios should reflect the risk level of the activity, the needs of participants, the complexity of the activity and the environment.
- Standard practice is 1 staff/volunteer to 3 individuals unless an individual has their own external support worker, in which case that person is not normally included in this ratio.
- Members/clients must complete the relevant referral process before joining, including information on known risks, allergies and emergency contacts.
- Staff and volunteers must remain alert to safeguarding concerns during all activities.

7.3 Managing Challenging Behaviour

Uppertunity recognises that behaviour can be a form of communication and may reflect unmet needs, frustration, distress, pain or communication difficulties. Our approach is guided by safety, dignity and empowerment.

- Violent or abusive behaviour is not accepted.
- If identified risks cannot be safely supported within Uppertunity's service model, this will be discussed with the individual and relevant supporters/referrers.
- If risk changes after a person joins, arrangements will be reviewed and continued attendance may not be possible where risks cannot be safely managed.
- Uppertunity does not provide one-to-one support. External support workers are expected to collaborate with Uppertunity staff.
- Volunteers must not be left in sole charge of vulnerable individuals where this falls outside their authorised and risk-assessed role.

Approach to De-escalation

- Remain calm and reassure the individual.
- Give the person space and dignity.
- Identify potential triggers such as pain, frustration or environmental stressors.
- Use appropriate distraction, redirection or a change of environment where helpful.
- Involve another staff member when appropriate.
- Ensure others nearby are safe and create privacy/space where possible.
- If there is an immediate risk of harm, call 999.

Post-Incident Actions and Recording

- Once safe, support the individual and consider what may have contributed to the incident.
- Inform relevant external professional support where appropriate and lawful.
- Support and debrief staff involved.
- Complete an Incident Report Form.
- The Manager/DSL or appropriate role-holder will review the incident, corrective actions, risk assessments and support plans.
- Record learning, including what went well, what could improve and any staff support required.

8. Charity Trustee Safeguarding Responsibilities

The Board of Trustees holds ultimate responsibility for ensuring that safeguarding is embedded across Uppertunity. Trustees will be supported with training and information to carry out this duty. Safeguarding will be reflected in governance arrangements, organisational planning and oversight.

The Board will:

- Ensure robust safeguarding, disclosure, conduct and whistleblowing policies and procedures are maintained and reviewed.
- Identify and oversee safeguarding risks.
- Promote a respectful culture where people can raise concerns.
- Ensure clear processes for recognising, responding to, recording and reporting concerns.
- Ensure relevant training is completed and refreshed.
- Oversee safer recruitment and appropriate PVG/disclosure arrangements.
- Review learning from incidents, near misses, complaints and referrals.
- Ensure safeguarding expectations are maintained in partnerships and commissioned arrangements.
- Ensure disclosure information is handled in accordance with the Disclosure Scotland Code of Practice and Sub-policy 1.
- Ensure the organisation understands and meets its legal duty to refer under Sub-policy 2.

A designated trustee will provide safeguarding oversight on behalf of the Board. This includes receiving appropriate reports, overseeing significant concerns or investigations, checking that recruitment and training controls are maintained, and ensuring that conflicts of interest are managed.

Everyone involved in Uppertunity is expected to understand the safeguarding procedures relevant to their role, complete required training, remain alert to risk and report concerns promptly.

9. Policy Review

This policy, including both disclosure sub-policies, will be reviewed at least annually by management and the Board of Trustees and updated when required by legislation, regulator/VSDS/Disclosure Scotland guidance or organisational change.

Staff, volunteers, trustees and authorised signatories will be informed of material updates relevant to their responsibilities.

Current role-holders for safeguarding and disclosure responsibilities will be maintained separately from this policy so staff changes do not make the policy obsolete.

10. Sub-policy 1: Secure Handling of Disclosure Information

10.1 Purpose

This sub-policy sets out how Uppertunity will handle disclosure information securely and confidentially. It applies to information obtained through Disclosure Scotland/VSDS processes, including PVG and other disclosure results. It supports compliance with the Disclosure Scotland Code of Practice, data-protection law and current VSDS secure-handling requirements.

10.2 Scope

This sub-policy applies to the Lead Signatory, authorised Additional Signatories, relevant managers and any other person who is specifically authorised to receive, view, discuss, record or make decisions using disclosure information.

10.3 Core Principles

- Disclosure information will be used only for the purpose for which it was obtained and only where the organisation is entitled to receive and consider it.
- Access will be limited to authorised people who need the information for their role.
- Disclosure information will not be shared informally, circulated widely, or discussed with people who do not have a legitimate need to know.
- The applicant will be treated fairly and information will be considered proportionately alongside the requirements and risks of the role.
- Uppertunity will keep only the minimum information necessary for its lawful recruitment, safeguarding and compliance purposes.

10.4 Receiving and Accessing Disclosure Information

- Disclosure information will be received or accessed only through current authorised VSDS/Disclosure Scotland processes.
- Applicants must share disclosure results with Uppertunity through the approved Disclosure Scotland process where this is required.
- Only the Lead Signatory and authorised Additional Signatories, or another specifically authorised decision-maker where necessary, may access the full disclosure information.
- Login details, passwords, multi-factor authentication methods and access links must not be shared between users. Each authorised person must use their own approved access arrangements.
- Disclosure information must not be accessed on public/shared computers or in a setting where unauthorised people can view the screen.

10.5 Use and Decision-Making

- Disclosure information will be considered only in relation to the relevant role and the organisation’s lawful recruitment/safeguarding responsibilities.
- A disclosure containing information will not automatically result in exclusion. Any decision will consider relevance, seriousness, circumstances, time elapsed, role requirements, safeguarding risk and any other appropriate information.
- Where necessary, the applicant will be given an appropriate opportunity to discuss relevant information before a final recruitment decision is made, subject to safeguarding and legal requirements.
- The full disclosure result will not be copied into general personnel notes, emails, supervision records or other systems.

10.6 Storage and Recording

- Uppertunity will avoid retaining copies, screenshots, downloads or printouts of disclosure certificates/results unless there is a clear lawful and operational need to do so.
- Where a temporary copy must be retained, it will be stored separately and securely with access restricted to authorised people. Digital copies must be held in an access-controlled location; physical copies, if any, must be kept in a locked, non-portable storage unit.
- General recruitment/PVG tracking records may record only the minimum necessary administrative information, such as the applicant's name, disclosure type, application/result date, role/workforce, outcome/decision, and any organisational interest or renewal information required for compliance.
- The tracking record must not reproduce detailed conviction or other sensitive disclosure content unless there is a specific lawful reason and documented necessity to do so.
- Disclosure information must not be sent through unsecure personal email accounts, messaging apps or shared drives that are accessible to people who are not authorised.

10.7 Retention and Secure Destruction/Deletion

- Full disclosure information will be retained only for as long as it is genuinely required for the recruitment/safeguarding decision, any related dispute or legal requirement, and in accordance with the current Disclosure Scotland Code of Practice and Uppertunity's retention arrangements.
- Once no longer required, paper disclosure information will be securely destroyed, for example by cross-cut shredding or confidential waste disposal, and digital copies will be securely deleted from active folders, downloads, email attachments and other storage locations under Uppertunity's control.
- Where a disclosure was viewed online and no copy was required, no local copy should be created simply for record-keeping purposes.
- Administrative evidence that an appropriate disclosure was obtained and considered may be retained where lawful and necessary, without retaining the full disclosure content.

10.8 Confidential Discussions and Sharing

- Any discussion of disclosure information must take place privately and only with people authorised to contribute to the decision.
- Information may be shared with statutory or regulatory bodies where there is a legal duty or lawful safeguarding reason to do so.
- If advice is sought from VSDS/Disclosure Scotland, only the information necessary to obtain that advice should be shared.

10.9 Data Breach or Accidental Disclosure

Any loss, misdirection, unauthorised access, accidental sharing or suspected compromise of disclosure information must be reported immediately to the Manager/appropriate senior role-holder and the person responsible for data protection. The organisation will contain the breach, record what happened, assess risk, take remedial action and make any required notification to the relevant authority or affected person.

10.10 Responsibilities

- Lead Signatory: ensures disclosure processes are operated in accordance with VSDS/Disclosure Scotland requirements and this sub-policy.
- Additional Signatories: follow this sub-policy and access information only within their authorised responsibilities.
- Manager/DSL: ensures disclosure information is used appropriately in recruitment and safeguarding decisions and that access remains proportionate.
- Board/designated trustee: provides governance oversight and seeks assurance that secure-handling arrangements are working.

10.11 Compliance

Failure to follow this sub-policy may result in removal of signatory/access permissions, management or disciplinary action, notification to VSDS/Disclosure Scotland or other authorities where required, and review of the organisation's disclosure arrangements.

11. Sub-policy 2: Making Referrals / Duty to Refer

11.1 Purpose

This sub-policy sets out how Uppertunity will meet its legal duty to refer individuals to Disclosure Scotland when the statutory criteria are met. It applies to people in regulated roles, including employees and volunteers, and may apply whether or not the individual is a PVG scheme member.

11.2 Organisational Responsibility

The duty to refer belongs to Uppertunity as an organisation. It is not solely the responsibility of the Lead Signatory, DSL or any one named individual. The Manager/DSL and relevant senior management or trustees will ensure possible referral cases are identified, assessed and acted on. The Board retains governance oversight.

11.3 When the Duty May Arise

A referral must be considered where an individual in a regulated role has engaged in harmful behaviour or conduct relevant to suitability and Uppertunity has removed, or would have removed, that person from the regulated role as a result. The duty may also apply where relevant concerns come to light after the person has left the organisation.

Harmful behaviour can include, for example:

- Harming a child or protected adult.
- Placing a child or protected adult at risk of harm, including through neglect or serious incompetence.
- Inappropriate sexual behaviour involving a child or protected adult.
- Inappropriate behaviour involving pornography where this falls within the statutory referral criteria.
- Inappropriate medical treatment of a child or protected adult.
- Other conduct that meets the legal referral criteria in force at the time.
- Harm may be physical, emotional/psychological, sexual, financial or otherwise recognised in the relevant legislation and guidance. It may include attempting, encouraging or facilitating harm.

11.4 What “Removed” Means for Uppertunity

The referral duty can be triggered where harmful conduct results in action such as:

- Dismissal from a regulated role.
- Ending a volunteer placement or other engagement because the person is no longer suitable to carry out the regulated role.
- Permanent removal or transfer away from the regulated role because of the conduct.
- A situation where Uppertunity would have dismissed or permanently removed the person, but they resigned, retired, left, stopped volunteering, or their contract/engagement ended before the action could be completed.

Temporary suspension while facts are established is a risk-management action and does not by itself determine whether the referral threshold is met. The organisation must consider the final facts, conduct and removal decision.

11.5 Relationship with Other Safeguarding or Disciplinary Processes

- The Disclosure Scotland referral duty is separate from referrals to Police Scotland, social work, regulators or other bodies. One does not replace another.
- Uppertunity will take immediate safeguarding action where required and will not delay urgent protection measures while considering a Disclosure Scotland referral.

- Internal disciplinary, grievance or volunteer-management procedures should be followed fairly, but a person leaving the organisation does not remove the duty to consider referral.
- The organisation should gather and preserve relevant factual records and evidence as part of its normal investigation/decision process.

11.6 Decision-Making Process

- Any concern that could involve harmful behaviour by a person in a regulated role must be escalated promptly to the DSL/Manager or, where conflicted, to an uninvolved senior role-holder or trustee.
- The responsible decision-makers will confirm whether the person was carrying out a regulated role, identify the relevant conduct and evidence, and determine what action Uppertunity has taken or would have taken.
- The statutory referral criteria and current Disclosure Scotland/VSDS guidance will be checked. Advice will be sought from Disclosure Scotland or VSDS where there is uncertainty.
- The rationale for the decision to refer or not refer will be documented securely.
- Where the threshold is met, the referral will be submitted within the statutory timescale. Current guidance requires referral within three months of the decision to permanently remove/dismiss the individual from the regulated role, including where an appeal is ongoing.

11.7 Information to Include

The referral will use the current Disclosure Scotland referral route/form and provide the information required at that time. This may include:

- Identity details for the individual.
- Details of the regulated role and relevant workforce.
- PVG scheme membership details where available and relevant.
- A clear account of the harmful conduct and risk, using appropriate anonymisation for children/protected adults where required.
- The outcome of Uppertunity's investigation/disciplinary or volunteer-management process.
- The action taken or action that would have been taken had the person not left.
- Relevant supporting records, statements or documents requested by Disclosure Scotland.

11.8 Confidentiality and Information Handling

Referral information is highly sensitive. It must be shared only with people who need it to manage the safeguarding, employment/volunteer-management and legal referral process. Records will be kept securely and handled in accordance with the Data Protection Policy and, where disclosure information is involved, Sub-policy 1.

11.9 Conflicts of Interest and Allegations Against Senior Role-Holders

- A person who is the subject of the concern must not decide whether a referral is made.
- If the concern involves the DSL, Manager or Lead Signatory, the matter must be overseen by the Chair or another uninvolved designated trustee.
- If the concern involves the Chair, another uninvolved trustee must lead the governance response and obtain external advice as necessary.

11.10 Advice and Current Guidance

Because referral decisions can be fact-specific and guidance may change, Uppertunity will use the current Disclosure Scotland and VSDS guidance at the point of decision. Where there is uncertainty, advice should be sought rather than assuming the duty does not apply.

Disclosure Scotland general contact: 0300 020 0040. Current referral forms, submission routes and contact details should be checked on the Disclosure Scotland/VSDS websites before a referral is submitted, rather than relying solely on contact details printed in an older policy version.

11.11 Records and Governance Oversight

- The decision, rationale, relevant dates and referral status will be recorded securely.
- The Board/designated safeguarding trustee will be informed of serious safeguarding matters and statutory referrals at an appropriate level of detail, while protecting confidentiality.
- Learning from referral cases will be used to improve recruitment, induction, supervision, training, risk assessment and safeguarding practice.

Policy Acknowledgement and Implementation

Uppertunity confirms that it will adhere to the secure handling of disclosure information requirements and to its legal responsibilities to make referrals where the statutory criteria are met. The Lead Signatory, Additional Signatories, relevant managers and trustees must understand the sections of this policy that apply to their responsibilities.

This document should be read alongside Uppertunity's Data Protection, Recruitment, Disciplinary, Whistleblowing, Health & Safety and other relevant organisational policies and procedures.

Current external guidance used for this update:

- Volunteer Scotland Disclosure Services (VSDS), Guidance and Resources - including Secure Handling of Disclosure Information Guidance and Policy, and Duty to Refer and Sample Policy (both listed as reviewed September 2026).
- Disclosure Scotland, current guidance on regulated roles, PVG scheme membership, five-year membership, disclosure application processes, Code of Practice and duty to refer.

External guidance should be checked at each annual review because disclosure legislation, processes and online systems may change.

Uppertunity Safeguarding Incident Form

Your information			
Name			
Address			
Contact number(s)			
Email			
Name of organisation		Your role	

Personal information – vulnerable individual					
Name				Date of birth	
Gender[i]	Male ☐	Female ☐	Non-binary ☐	Another description (please state) ☐	
Is there any information about the individual that would be useful to consider?					

Contact information – parent / carer / social worker		
Name(s)		
Address		
Contact number(s)		
Email		
Have they been notified of this incident?	No ☐	Please explain why this decision has been taken
	Yes ☐	Please give details of what was said / actions agreed

Incident details*				
Date and time of incident				
Please tick one:	☐ I am reporting my own concerns.	☐ I am responding to concerns raised by someone else – please fill in their details:		
Name of person raising concern		Role within the organisation or relationship to the individual		
Contact number(s)				
Email				

Details of the incident or concerns (include other relevant information, such as description of any injuries and whether you are recording this incident as fact, opinion or hearsay)

* Attach a separate sheet if more space is required (e.g. multiple witnesses)

Incident details (continued)			
Individual's account of the incident			
Please provide any witness accounts of the incident			
Name of witness (and date of birth, if a child)		Role within the organisation	
Address			
Contact number(s)			
Email			
Details of any person involved in this incident or alleged to have caused the incident / injury			
Name (and date of birth, if a child)		Role within the organisation	
Address			
Contact number(s)			
Email			

Please provide details of action taken to date:

Has the incident been reported to any external agencies?	☐ No	☐ Yes – please provide further details:

Name of organisation / agency	
Contact person	
Contact number(s)	
Email	
Agreed action or advice given	

Declaration	
Your signature	×
Print name	
Today's date	

Contact your organisation's Designated Safeguarding Officer in line with Uppertunity's reporting procedures	
Safeguarding Officer's name	
Date reported	

Uppertunity Safeguarding Declaration

The overall safety of our clients is of utmost importance to Uppertunity, and we take every step possible to ensure we maintain this. Uppertunity will not tolerate the abuse of adults in any of its forms and is committed to safeguarding adults with care and support needs from harm. Uppertunity takes reasonable steps to manage risks and keep all our clients safe.

It is a requirement that all volunteers and staff assist in safeguarding procedures. Completing this form does not remove the requirement on a staff members or volunteer to complete a PVG application. It is in addition. Copies of this form will be kept by the manager of Uppertunity for up to a year after the end of your engagement with Uppertunity. Thank you for supporting our work.

Declaration	
I have read Uppertunity's Safeguarding Policy	
I understand what safeguarding is, and what my roles and responsibilities are in regard to keeping our clients safe at Uppertunity	
I hereby agree to comply with Uppertunity's Safeguarding Policy and Procedures, and attend any required training	
I am aware of who the Named Safeguarding Person is, and how to contact them	
I understand what to do if there is a safeguarding incident or emergency, or if I have any concerns	
I understand duty of care, and agree to comply to Uppertunity's code of conduct	

Signed by employee or volunteer	
Employee/volunteer	
Date of completion	
Signature	

Sign-off by manager	
Manager	
Date of completion	
Signature	

6. Expenses Policy

1. Purpose

This policy outlines how staff and volunteers can claim expenses incurred while carrying out activities on behalf of Uppertunity. We aim to keep this process simple, fair, and transparent, while ensuring responsible use of funds.

2. General Principles

- All expenses must be agreed in advance with a manager
- Wherever possible, Uppertunity will purchase items directly using a the company's business card
- Spending should be necessary, reasonable, and kept to a minimum
- Only management, including Leads, hold bank cards and are responsible for most purchases

3. Spending Guidelines

Food & Activity Costs

- Management (including Leads) may purchase food for sessions, catering, or events up to £200
- Larger amounts must be agreed in advance with the Manager
- This is for operational delivery and should not become routine or excessive

Other Purchases (e.g. materials, equipment)

- All purchases must be agreed in advance
- Any item over £30 must be approved by the Manager
- Spending should be occasional and not a regular substitute for planned purchasing

What Can Be Claimed

- Pre-approved materials and supplies
- Travel for work-related activities such as transporting members or catering
- Pre-agreed food and activity costs

What Cannot Be Claimed

- Travel to and from your usual place of work
- Personal items
- Any unapproved purchases

Receipts & Submitting Expenses

- A receipt (photo or copy) must be provided via email or WhatsApp
- Expenses should be submitted to your manager
- Claims must be submitted within 30 days
- Expenses without receipts may not be reimbursed unless agreed in advance

4. Mileage

- Mileage is paid at 45p per mile
- Applies to work-related travel only (not commuting)
- Mileage should be submitted monthly, including:
    - Date
    - Purpose
    - Number of miles

5. Volunteer Expenses

- Mileage will be covered where volunteers are supporting members or delivering activities
- Due to limited funding, we are not able to cover travel to/from Uppertunity

6. Disclosure (PVG) Costs

- Staff are required to complete a PVG/disclosure check
- This is paid for by the staff member and reimbursed by Uppertunity upon completion
- Volunteers are not required to cover this cost

7. Payment Process

- Payments are made via bank transfer
- Reimbursement will be made within 14 days of approval

8. Approval

- The Manager approve standard expenses
- Larger or exceptional expenses must be approved by the Manager

Uppertunity reserves the right to decline any expense that does not follow this policy.

7. Reserves Policy

1. Introduction

1.1. The purpose of this Reserves Policy is to ensure that Uppertunity's trustees and directors take proactive steps to secure the organisation's long-term financial sustainability. It provides assurance to staff, clients, and stakeholders that all funds received are used for charitable purposes.
1.2. Reserves are defined as unrestricted funds available for use at the discretion of the organisation, excluding restricted funds and tangible fixed assets.
1.3. Uppertunity's reserves are referred to as Operating Reserves.

2. Purpose of Reserves

2.1. Operating Reserves provide financial stability to sustain Uppertunity's mission, employment, and operations.
2.2. Reserves may be used for:

- Emergency funding gaps due to unexpected expenses or loss of income.
- One-time strategic investments in staff development, research, or infrastructure.

2.3. Reserves are not intended to replace long-term funding or cover recurring deficits.
2.4. In alignment with Uppertunity's Articles of Association, all surplus income is used for community benefit.

3. Calculation of Reserves

3.1. The calculation of reserves includes essential, recurring costs such as salaries, rent, and core service provisions.
3.2. Reserves will be reviewed annually following the approval of Uppertunity's accounts by an external accountant.
3.3. Uppertunity, as a company limited by guarantee, sets reserves based on its annual income and expenditure.
3.4. The target reserve level is equivalent to six months' operating costs.
3.5. The Board may allocate certain one-time revenue sources, such as grants or donations, to reserves if deemed necessary.

4. Reporting and Monitoring

4.1. Reserves are managed transparently and included in monthly financial reports.
4.2. The Executive Manager is responsible for monitoring reserve levels and raising concerns with the Board when:

- Reserves exceed necessary levels.
- Reserve levels fall below the agreed target.

4.3. The reserves policy is reviewed annually alongside the organisation's budget and activities.
4.4. Reserve levels and their designated use will be outlined in Uppertunity's Annual Report.
4.5. Operating Reserves are held within the organisation's general accounts and monitored monthly.

5. Use of Reserves

5.1. Reserves are carried forward each month and are only used under specific circumstances.
5.2. The Board of Directors must approve any use of reserves through a majority vote in a Directors Meeting.
5.3. If reserves are required due to financial shortfall (e.g., rent or salaries), the Executive Manager must convene a meeting with the Board.
5.4. When reserves are used, an analysis of the financial situation will be conducted.
5.5. If Operating Reserves are used, the Board will develop a plan to replenish reserves within a reasonable timeframe.
5.6. All use of reserves must be recorded and reported by the Executive Manager.

6. Oversight and Governance

6.1. The reserves policy is a living document, monitored throughout the year as part of Uppertunity's financial strategy.
6.2. The Board will ensure that reserves are neither excessive nor insufficient.
6.3. Annual reporting will include:

- The reserves policy and target levels.
- Actual reserve levels and any changes.
- Any use of reserves and plans for replenishment.

6.4. The Board may consider investing reserves for financial returns while ensuring funds remain accessible when needed.

7. Regulatory Compliance

7.1. The policy aligns with Charity Commission guidance on financial management and reserves.
7.2. The reserves policy will be reviewed annually to ensure continued relevance and compliance with regulations.

Summary of Reserves Policy

- **Purpose:** Ensure financial stability and support long-term sustainability.
- **Target:** Maintain reserves equal to six months' operating costs.
- **Monitoring:** Reviewed monthly and reported in the Annual Report.
- **Use of Reserves:** Approved by the Board of Directors only for emergencies or strategic investments.
- **Review:** Annually assessed for financial health and compliance with regulatory guidance.

This policy ensures Uppertunity remains resilient while effectively managing its financial resources for maximum community impact.

8. Equality, Diversity and Inclusion Policy

1. Policy Statement

Uppertunity promotes an inclusive and diverse workplace, ensuring equal opportunities for all regardless of race, gender, disability, age, religion, or sexual orientation. We strive to create a level playing field by addressing systemic barriers and discrimination while fostering a culture of equity and respect.

2. Key Commitments

- Ensuring fair recruitment practices.
- Providing reasonable adjustments for employees with disabilities.
- Challenging discrimination, harassment, and inequality.
- Creating an inclusive environment where everyone feels welcomed, respected, and valued.
- Encouraging diversity to foster creativity, innovation, and better decision-making.

3. Our Approach

At Uppertunity, our members lead our activities, ensuring services are tailored to their needs and aspirations. We support wellbeing, connections, training, development, and employment within our community. Majority of our staff have faced barriers to employment, including mental health challenges, caregiving responsibilities, early school leaving, and learning disabilities. Our operational model is shaped around these experiences.

We aim to build a diverse team representing a range of backgrounds. To enhance inclusivity, we will conduct an internal audit at our next visioning event to identify representation gaps and develop strategies to address them. While equality is a core principle, we prioritise equity, recognising that individuals have unique circumstances requiring tailored support. We provide mentoring for all staff and volunteers to ensure their strengths are recognised and utilised effectively.

Uppertunity was founded to create opportunities for inclusion. We believe in continuous improvement and fostering dialogue through visioning days and community events.

4. Fair Work Practices

Our approach aligns with the Fair Work Convention's five dimensions: Security, Respect, Effective Voice, Opportunity, and Fulfilment.

4.1 Security

- Providing stable contractual arrangements with consistent hours.
- Paying at least the Living Wage (as per the Living Wage Foundation).
- Offering flexible work schedules to accommodate family and caregiving needs.
- Providing pension arrangements.

4.2 Respect

- Implementing robust health, safety, and wellbeing policies.
- Promoting dignity at work and embedding respect as a core value.
- Ensuring fair conflict resolution practices.
- Providing ongoing mentoring and professional development opportunities.

4.3 Effective Voice

- Encouraging dialogue and participation through trade union recognition and collective bargaining.
- Conducting regular team meetings and quarterly visioning days.
- Maintaining open channels for communication and consultation.

4.4 Opportunity

- Ensuring fair and unbiased recruitment processes.
- Providing accessible training and career development opportunities.

- Prioritising employment for individuals facing barriers to work.

4.5 Fulfilment

- Designing jobs that allow for skill utilisation and autonomy.
- Encouraging creative problem-solving and leadership development.
- Investing in continuous learning and career advancement.

5. Recruitment and Development

- Inclusive Hiring: We prioritise lived experience and first consider internal candidates before external recruitment.
- Bias-Free Recruitment: We aim to implement blind recruitment techniques where possible.
- Equal Pay: All contracted staff are paid equally at living wage standards.
- Flexible Work Arrangements: We encourage work-life balance, with full-time staff working four days a week.
- Employee Involvement: Monthly team meetings, mentoring, and participation in board meetings foster transparency and engagement.
- Workplace Wellbeing: Access to external counselling services and mental health resources.
- Training and Development: Staff receive ongoing training, including first aid, mental health awareness, and risk management.

6. Inclusive Management

Uppertunity fosters an open and empowering culture where all members, staff, and volunteers are integral to decision-making. We implement:

- Transparent communication on practices, aims, and finances.
- Leadership by example, with management involved in all aspects of operations.
- Collaborative work distribution, ensuring team input in planning and service delivery.
- Regular team bonding activities, such as creative workshops and social events.
- An open-door policy to support team members and address challenges proactively.

7. Addressing Discrimination

Uppertunity does not tolerate discrimination based on any protected characteristic under the Equality Act 2010, including:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including nationality and ethnicity)
- Religion or belief
- Sex
- Sexual orientation

Our staff and volunteers receive training to recognise and challenge discriminatory behaviours, ensuring an inclusive and equitable workplace.

8. Monitoring and Review

- We will conduct annual reviews of workforce demographics and workplace practices.
- An action plan will be developed to address any identified gaps in diversity or inclusivity.
- Employee and volunteer feedback will inform policy updates and organisational improvements.

This policy aligns with Uppertunity's mission to empower individuals through self-determination, inclusion, and community-driven progress.

9. Workplace Mental Wellbeing Policy

1. Policy Statement

Uppertunity recognises that supporting the mental wellbeing of employees and volunteers is vital for individual and organisational success. Mental wellbeing affects health, safety, social inclusion, and productivity. By fostering a positive and supportive culture, we enhance the lives of individuals, their families, and society as a whole.

Our goal is to create an environment where employees feel comfortable discussing mental health, accessing support, and maintaining wellbeing. We treat mental health with the same seriousness as physical health and provide structured support for employees experiencing difficulties. This policy applies equally to all employees and volunteers and aligns with other health and safety policies, including sickness absence, substance abuse, and bullying and harassment.

2. Key Principles

2.1. Promoting Mental Wellbeing in the Workplace

We aim to foster a workplace environment that actively supports mental wellbeing by:

- Raising awareness about mental health through training and resources.
- Providing opportunities for stress-reducing activities, such as physical exercise, team bonding, and social events.
- Offering flexible working arrangements to support mental health.
- Ensuring clear job roles, objectives, and responsibilities with appropriate management support and training.
- Preventing workplace bullying, discrimination, or harassment.
- Maintaining open communication between staff and management, particularly during organisational changes.

2.2. Creating a Supportive Culture

We strive to build a culture based on trust, respect, and openness by:

- Encouraging employees to discuss mental health without fear of discrimination or reprisal.
- Providing non-judgmental and proactive support to those experiencing mental health challenges.
- Handling mental health concerns sensitively and maintaining confidentiality.
- Supporting employees dealing with external factors affecting their mental health.
- Offering a comprehensive induction programme to all new employees.

2.3. Supporting Employees with Mental Health Difficulties

We commit to:

- Ensuring fair treatment for employees facing mental health challenges.
- Encouraging staff to seek support from their GP or a professional counsellor.
- Investigating workplace factors contributing to stress and addressing them where possible.
- Facilitating a phased return to work for employees recovering from mental health issues.
- Exploring alternative roles if returning to the same job is not possible.
- Maintaining strict confidentiality and sharing information only on a need-to-know basis with the individual's consent.

2.4. Promoting Fair Employment Practices

We aim to reduce stigma and discrimination in recruitment and employment by:

- Displaying positive and inclusive messaging about mental health in job advertisements.
- Training all recruitment personnel on mental health awareness and disability rights.
- Making it clear that mental health disclosures will not negatively impact hiring decisions.
- Avoiding assumptions about an individual's ability to work based on mental health history.
- Providing line managers with training on managing mental health in the workplace.

2.5. Addressing Workplace Stress as a Health & Safety Issue

To manage and mitigate workplace stress, we will:

- Conduct regular risk assessments to identify and address stressors.
- Consult with employee representatives on stress management initiatives.

- Provide training on effective stress management and resilience.
- Offer access to confidential counselling services.
- Ensure managers are equipped to support staff in handling workplace stress.

3. Responsibilities

3.1. Responsibilities of Managers

Managers play a key role in maintaining a mentally healthy workplace. Their responsibilities include:

- Identifying and mitigating stressors in the workplace.
- Ensuring good communication between employees and leadership.
- Supporting employees experiencing personal or work-related stress.
- Providing the necessary resources and training for staff to carry out their jobs effectively.
- Monitoring workloads to prevent excessive stress and burnout.
- Encouraging employees to take their full holiday entitlement.
- Providing opportunities for professional development.
- Ensuring all managers receive training on mental health awareness and management.

3.2. Responsibilities of Employees

Employees also have a role to play in maintaining workplace wellbeing. They are responsible for:

- Raising concerns about stress or mental health issues with their manager or designated representative.
- Seeking support when needed and engaging with wellbeing initiatives.
- Supporting colleagues by fostering a respectful and inclusive environment.
- Engaging with counselling or support services if recommended.

4. Implementation & Monitoring

- The effectiveness of this policy will be reviewed annually.
- Uppertunity will monitor and report on levels of mental health-related absences.
- Regular training and awareness sessions will be provided for all employees.
- Feedback mechanisms will be put in place to assess employee wellbeing and workplace culture.

By implementing this policy, Uppertunity commits to fostering a workplace that prioritises mental health, reduces stigma, and supports all employees in achieving positive wellbeing.

10.Conflict of Interest Policy

1. Introduction

1.1. All staff, volunteers, and Directors of Uppertunity will strive to avoid any conflict of interest between the interests of the Organisation and personal, professional, or business interests. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.
1.2. The purpose of this policy is to protect the integrity of Uppertunity's decision-making process, maintain stakeholder confidence, and safeguard the reputation of volunteers, staff, and Directors.
1.3. This policy is intended to supplement good judgment, and staff, volunteers, and Directors should adhere to its spirit as well as its wording.
1.4. Examples of conflicts of interest include:

- A Director who is also a service user and must vote on user fees.
- A Director related to a staff member involved in decisions on staff pay and conditions.
- A Director who serves on another committee competing for the same funding.
- A Director with shares in a business seeking a contract with Uppertunity.
- Employees engaging in activities that financially benefit a competitor.
- Employees using company resources for external business interests.
- Employees accepting bribes or offering them to authorities.

2. Appointment of Directors and Hiring of Staff

2.1. Upon appointment, each Director and staff member must disclose any interests that could potentially result in a conflict of interest. This disclosure will be updated annually or as appropriate.
2.2. During meetings or activities, Directors must disclose any interests that could create a conflict and seek clarification if in doubt.

3. Articles of Association Statement

3.1. Directors must declare any personal interest likely to give rise to a conflict.
3.2. A Director is deemed to have a personal interest if they, their partner, close relative, or associated business have an interest in a matter.
3.3. If a question arises about whether a Director has a conflict of interest, it will be decided by a majority vote of the other Directors.
3.4. Where a Director has a conflict of interest:

- They may remain for part of the discussion but not for the decision-making process.
- They will not be counted in the quorum for that section of the meeting.
- They must abstain from voting on the matter.

3.5. The Chair and all other Directors each hold one vote.

4. Employment Contracts and Conflicts

4.1. Employees must not engage in any external business activity that conflicts with Uppertunity's interests without written consent.
4.2. Employees are prohibited from engaging with, financially supporting, or working for direct competitors.
4.3. Employees must not:

- Induce colleagues or contractors to leave Uppertunity for competitive employment.
- Interfere with Uppertunity's relationships with employees or contractors.
- Share employment opportunities with competitors.
- Solicit or hire Uppertunity's employees or contractors for competing businesses.

5. Managing Conflicts of Interest

5.1. If a conflict of interest arises for a Director due to loyalty owed to another organisation or person, the unconflicted Directors may authorise the situation if the following conditions are met:

- The Charity Commission's permission is sought before a benefit for a trustee is authorised (unless already permitted in the Articles of Association or by written approval from the Commission).
- The conflicted Director withdraws from discussions affecting that organisation or person.
- The conflicted Director abstains from voting and is not counted towards the quorum.
- The remaining Directors determine that authorising the conflict serves the charity's best interests.

5.2. All disclosures and actions taken to manage conflicts of interest must be recorded in meeting minutes.
5.3. For all other potential conflicts of interest, guidance will be sought from Social Enterprise Scotland, and the advice and subsequent actions will be recorded in the minutes.

Declaration of Interest Form

Person or organisation	**Nature of relationship and/or nature of conflict of interest**

Name: _____
Position: _____
Signed: _____
Date: _____

NB: Complete one form for each member of the committee and file with the minutes.

11.Social Media and Photography Policy

1. Statement of Policy and Purpose

1.1. Uppertunity recognises that social interaction and photography are valuable tools for sharing our work, celebrating achievements, and engaging our community. Used appropriately, they enhance our reputation and mission; used inappropriately, they can cause harm or risk to individuals and the organisation.
1.2. This policy governs the use of social media and photography to protect the organisation's reputation, ensure the safety and privacy of those we work with, and provide clear guidance for staff, volunteers, and representatives.
1.3. This policy applies to all employees, volunteers, trustees, contractors, and placement students, whether acting in a professional or personal capacity where their actions could impact Uppertunity.
1.4. This policy should be read alongside our Data Protection Policy, Safeguarding Policy, and Code of Conduct.

2. Scope

This policy applies to:

- Employees, volunteers, trustees, and contractors.
- All forms of social media (Facebook, Instagram, LinkedIn, Twitter/X, TikTok, YouTube, blogs, online forums).
- The taking, storage, and sharing of photographs or videos in any capacity connected to Uppertunity.

3. Photography Rules

3.1. **Who Can Take Photos**

- Only paid staff are permitted to take photographs or videos for Uppertunity purposes.
- Volunteers, members, and visitors are not permitted to take photographs or videos during Uppertunity activities or events.

3.2. **Consent**

- Even if an individual has previously signed a consent form, verbal consent must be sought each time before taking a photo or video.
- Consent must be informed, meaning the individual (or their guardian) understands what the image will be used for and has the right to decline without explanation.

3.3. **Storage and Security**

- Photos and videos must not be stored on personal mobile phones.

3.4. **Use of Images**

- Images and videos will only be used for purposes agreed at the time of consent (e.g., marketing materials, social media, reports).
- Any changes in use (e.g., using an image for a different campaign) require new consent.

4. Social Media Use

4.1 **Official Use**

- Only authorised staff may post content on Uppertunity's official social media accounts.
- Official posts must follow brand guidelines, respect confidentiality, and align with organisational values.

4.2 **Personal Use**

- Staff and volunteers must not post photographs or videos of Uppertunity members, events, or activities on their personal social media accounts, even if they have consent.
- Staff and volunteers may share official posts by using the direct link or share function from Uppertunity's social media pages.
- Opinions expressed on personal accounts must be clearly stated as personal and not representative of Uppertunity.

5. Prohibited Use

Social media and photography must not be used to:

- Breach confidentiality or data protection policies.
- Harass, bully, or discriminate.
- Share misleading, defamatory, or offensive content.
- Damage Uppertunity's reputation or relationships with stakeholders.

6. Monitoring and Compliance

6.1. Uppertunity may monitor social media activity related to its work, where legally permissible, to ensure policy compliance.
6.2. Any breach of the photography or social media rules may result in disciplinary action, removal from role, or legal action if necessary.

7. Review

This policy will be reviewed annually and updated as necessary. All staff, volunteers, and trustees will be informed of changes and are required to comply with the most recent version.

12.Whistleblowing Policy

1. Introduction

1.1. Uppertunity is committed to conducting its business fairly, honestly, and with transparency, in compliance with all legal and regulatory obligations. We expect all directors, employees, and anyone acting on our behalf to maintain the highest standards of ethical business behaviour.
1.2. However, all organisations face the risk of wrongdoing or misconduct. A culture of openness and accountability is essential in preventing such situations and addressing them appropriately when they arise.
1.3. This policy provides a robust whistleblowing framework that allows employees, volunteers, and other stakeholders to report concerns in confidence, ensuring that all issues raised are taken seriously and investigated thoroughly.
1.4. This policy aims to:

- Encourage and empower colleagues to report suspected wrongdoing as soon as possible.
- Provide guidance on how to raise concerns.
- Reassure individuals that they can raise genuine concerns without fear of reprisals, even if mistaken.
- Foster a culture of openness and accountability.
- Ensure compliance with relevant legislation.

2. Scope

2.1. This policy applies to all employees, directors, officers, contractors, agency workers, casual workers, consultants, and trainees at Uppertunity.
2.2. It also applies to concerns related to customers, suppliers, or any other third parties with whom Uppertunity interacts.
2.3. This policy should not be used to question business decisions or raise HR-related grievances such as harassment, bullying, or discrimination, which should be addressed through Uppertunity's grievance policy.

3. What Should Be Reported?

3.1. Uppertunity encourages the reporting of any unlawful, dishonest, or unethical behaviour, including but not limited to:

- Criminal activity (e.g., fraud, theft, embezzlement).
- Corruption, bribery, or blackmail.
- Financial malpractice or mismanagement.
- Facilitating tax evasion.
- Failure to comply with legal, regulatory, or professional obligations.
- Actions endangering health and safety.
- Environmental damage.
- Providing false information to public officers.
- Miscarriage of justice.
- Unauthorised disclosure of confidential information.
- Deliberate concealment of wrongdoing.
- Retaliation against whistleblowers.

4. Reporting a Concern

4.1. Uppertunity provides multiple channels for reporting concerns to ensure accessibility and confidentiality.

Option 1: Report to Manager

- Employees and volunteers should raise concerns with their line manager in the first instance, either verbally or in writing.
- If the issue implicates the manager, employees should escalate the concern through another option.

Option 2: Report to Chair of the Board

- If an employee or volunteer does not feel comfortable reporting to their manager or is dissatisfied with the response, they can escalate the concern to the Chair of the Board.

Option 3: Report to OSCR (Office of the Scottish Charity Regulator)

- If internal reporting is not possible or does not lead to appropriate action, individuals can report concerns to OSCR.

Option 4: External Advice

- Employees and volunteers can seek guidance from external bodies such as:
  - Advisory, Conciliation, and Arbitration Service (Acas)
  - The whistleblowing charity *Protect*
  - Their trade union

5. Protection for Whistleblowers

5.1. Employees and volunteers are protected by law when reporting concerns in the public interest, including reporting:

- A criminal offense (e.g., fraud).
- A danger to health and safety.
- Risk or actual damage to the environment.
- A miscarriage of justice.
- Legal non-compliance (e.g., lack of proper insurance).
- Cover-ups of wrongdoing.

5.2. Personal grievances (e.g., bullying, harassment, discrimination) are not covered under whistleblowing laws unless they are in the public interest. These should be reported through Uppertunity's grievance policy.
5.3. Uppertunity prohibits retaliation against whistleblowers. Any individual who attempts retaliation will face disciplinary action, up to and including dismissal.

6. Confidentiality

6.1. All reports will be treated with the strictest confidentiality.
6.2. Anonymous reports will be accepted, but whistleblowers are encouraged to provide their contact details to facilitate an effective investigation.
6.3. Information will only be shared on a need-to-know basis to ensure proper handling of the concern.

7. Investigation and Follow-Up

7.1. Once a report is made:

- A designated officer will acknowledge receipt within five working days.
- A preliminary assessment will determine if further investigation is required.
- Investigations will be conducted promptly and fairly.
- Findings and necessary actions will be communicated to the whistleblower where appropriate.

8. Monitoring and Review

8.1. The effectiveness of this policy will be reviewed annually by Uppertunity's Board.
8.2. Amendments will be made as necessary to align with best practices and legal requirements.

9. Conclusion

9.1. Uppertunity is committed to fostering a safe and transparent workplace where employees and volunteers feel confident to report wrongdoing.
9.2. This policy ensures that concerns are raised, addressed appropriately, and that whistleblowers are protected from any form of retaliation.

13. Complaints and Grievances policy

1. Introduction

1.1. Uppertunity is committed to fostering an inclusive, fair, and respectful environment for all clients, staff, volunteers, and individuals using our services.
1.2. We recognise that from time to time, concerns, conflicts, or complaints may arise. This policy outlines the procedures for raising and addressing grievances in a fair, confidential, and timely manner.
1.3. All grievances will be taken seriously and handled with respect, impartiality, and sensitivity.

2. Scope

2.1. This policy applies to:
- Clients using Uppertunity's services
- Employees and contractors
- Volunteers
- Trustees
- Any other individuals engaging with Uppertunity in any capacity

2.2. This policy covers grievances related to but not limited to:
- Workplace or service-related concerns
- Treatment by staff, volunteers, or clients
- Discrimination, harassment, or bullying
- Unfair treatment, misconduct, or breach of policies
- Health and safety concerns
- Service delivery concerns

3. Informal Resolution

3.1. Uppertunity encourages informal resolution where possible and appropriate.
3.2. Clients, staff, or volunteers who have concerns should initially raise them directly with the relevant individual involved or with their supervisor/manager.
3.3. If an informal resolution is not possible or does not resolve the issue satisfactorily, the formal grievance procedure should be followed.

4. Formal Grievance Procedure

4.1. **Stage One: Submission to Management**
- A formal grievance should be submitted in writing to the Manager or an appropriate senior staff member.
- The written grievance should include:
  - The nature of the complaint
  - Relevant facts and supporting evidence
  - Any steps already taken to resolve the matter
  - Desired resolution
- The Manager will acknowledge receipt within 5 working days and conduct an investigation.
- A meeting will be arranged to discuss the grievance, and an outcome will be provided in writing within 10 working days of the meeting.

4.2. **Stage Two: Escalation to Trustees**
- If the complainant is not satisfied with the outcome of Stage One, they may escalate the grievance to the Board of Trustees in writing.
- The Trustees will acknowledge receipt within 7 working days and may appoint an impartial member to investigate.
- A meeting will be held with the complainant to review the case.
- A final decision will be issued within 14 working days of the meeting.

4.3. **Stage Three: External Resolution**

- If the complainant is still not satisfied, they may refer their grievance to external bodies such as:
    - The Advisory, Conciliation and Arbitration Service (Acas)
    - The Charity Commission (OSCR in Scotland) if it relates to governance issues
    - A legal professional or advocacy group for further support
    -

5. Confidentiality & Non-Retaliation

5.1. All grievances will be handled with confidentiality, and information will only be shared on a need-to-know basis.
5.2. No individual will be treated unfairly or face retaliation for raising a grievance in good faith.
5.3. If any grievance involves allegations of misconduct, discrimination, or safeguarding concerns, appropriate safeguarding policies will be followed.

6. Monitoring & Review

6.1. The Board of Trustees will monitor grievances to identify trends and improve policies.
6.2. This policy will be reviewed annually to ensure its effectiveness and fairness.

14. Digital and IT Security

1. Purpose and Scope

1.1. Uppertunity is committed to safeguarding its digital assets, IT infrastructure, and sensitive data by implementing robust digital and IT security measures. This policy outlines the security protocols for all employees, volunteers, trustees, and service users who interact with our digital systems.
1.2. This policy applies to all devices, networks, software, cloud services, and personal data handled within Uppertunity, including computers, mobile devices, emails, and cloud-based systems.
1.3. The objective of this policy is to:

- Protect sensitive and personal data from unauthorised access.
- Prevent cyber threats such as malware, phishing, hacking, and data breaches.
- Ensure compliance with GDPR, Data Protection Act (2018), and relevant regulations.
- Establish clear guidelines for staff, volunteers, and service users on IT security best practices.

2. Authentication and Access Control

2.1. **Double Password Protection**:

- All accounts, including email, cloud services, and internal systems, must be protected with two passwords or multi-factor authentication (MFA) where applicable.
- Passwords must be unique, complex, and changed regularly.
- Staff must not reuse passwords from personal accounts for Uppertunity systems.

2.2. **User Access Levels**:

- Access to systems and data is granted based on the principle of least privilege (only the necessary access for work duties).
- Only authorised personnel can access sensitive data, and access will be regularly reviewed.
- Staff and volunteers should notify the IT team if access permissions need to be changed or revoked.

2.3. **Account Management**:

- All user accounts must be disabled immediately when staff, volunteers, or service users leave the organisation.
- Shared accounts must be avoided unless absolutely necessary.

3. Data Security and Protection

3.1. **Data Storage**:

- All sensitive data must be stored securely in Uppertunity's encrypted cloud system or secure internal servers.
- Physical copies of sensitive information must be kept in locked cabinets with controlled access.
- No personal or sensitive data should be stored on USB sticks or personal devices without encryption and management approval.

3.2. **Data Transmission and Sharing**:

- Sensitive data must only be shared via secure and encrypted communication channels (e.g., encrypted emails, secure file-sharing platforms).
- Personal or client information must never be sent via unencrypted email or messaging apps.
- Staff must verify recipient identities before sharing sensitive information.

3.3. **Data Retention and Disposal**:

- Uppertunity follows a strict data retention policy to ensure data is not kept longer than necessary.
- Any sensitive data that is no longer required must be securely deleted from digital systems and shredded if in physical form.

4. IT Infrastructure and Device Security

4.1. **Device Management**:

- All devices used for work must have password protection and, where possible, encrypted storage.
- Staff should lock their devices when unattended and log out of systems after use.
- Any loss or theft of work-related devices must be reported immediately.

4.2. **Software and Updates**:

- All operating systems, applications, and security software must be regularly updated to protect against vulnerabilities.
- Only approved software and applications should be installed on Uppertunity devices.
- Unauthorised software or file downloads are strictly prohibited.

4.3. **Network Security**:

- Staff must connect to secure networks only. Public Wi-Fi should not be used without a VPN.
- Internal Wi-Fi networks must be password-protected and regularly monitored.
- Firewalls and antivirus software must be enabled and regularly updated.

5. Email and Internet Security

5.1. **Phishing and Fraud Protection**:

- Staff must be cautious of unsolicited emails requesting sensitive information.
- Do not click on unknown links or download attachments from unverified sources.
- Suspicious emails should be reported to the IT team immediately.

5.2. **Acceptable Use of Internet and Social Media**:

- Personal internet use must not interfere with work responsibilities.
- Employees must avoid accessing or sharing inappropriate, illegal, or harmful content.
- Social media use must comply with Uppertunity's Social Media Policy.

6. Incident Reporting and Response

6.1. **Security Incidents**:

- Any suspected data breach, unauthorised access, or cyberattack must be reported to the IT team immediately.
- Staff should not attempt to resolve security issues independently but must follow the designated reporting process.
- The IT team will assess the situation and take appropriate action, including notifying relevant authorities if necessary.

6.2. **Data Breach Response Plan**:

- In the event of a data breach, Uppertunity will follow the Data Protection Policy and report serious breaches to the Information Commissioner's Office (ICO) within 72 hours if required.
- Affected individuals will be informed of any breach that poses a risk to their personal data.

7. Training and Compliance

7.1. **Staff Training**:

- All staff and volunteers must undergo IT security training upon joining Uppertunity.
- Regular refresher training sessions will be conducted to ensure compliance with security practices.

7.2. **Compliance and Monitoring**:

- Compliance with this policy is mandatory, and violations may result in disciplinary action.
- Regular audits and security reviews will be conducted to identify and mitigate risks.

8. Policy Review and Updates

8.1. This policy will be reviewed annually and updated as necessary to reflect changes in technology, regulations, and best practices.

8.2. Any modifications to this policy must be approved by Uppertunity's management and IT team.

15.Volunteer Policy

1. Introduction

Volunteers are a vital part of Uppertunity, supporting our mission and strengthening our services. This policy outlines our commitment to volunteers, the expectations of volunteers, and how we ensure a positive and mutually beneficial experience.

Definition of a Volunteer:
A volunteer at Uppertunity is someone who, without financial expectation beyond reimbursed expenses, undertakes tasks at the request and on behalf of the organisation. Volunteers must be at least 16 years old, with no maximum age limit.

2. Role of Volunteers

Volunteers support Uppertunity's strategic aims by:

- Enhancing services for our clients
- Bringing new skills, ideas, and perspectives
- Increasing community engagement
- Supporting the overall mission of Uppertunity

Volunteers do not replace paid staff but complement and enhance our work.

3. Uppertunity's Commitment to Volunteers

We strive to:

- Treat volunteers with respect, appreciation, and fairness.
- Provide clear roles and expectations.
- Offer support, training, and supervision to help volunteers succeed.
- Foster an inclusive, positive, and engaging volunteer experience.
- Ensure volunteers are properly integrated into the organisation.
- Reimburse agreed-upon expenses.
- Protect volunteers' health, safety, and wellbeing.
- Comply with data protection and confidentiality policies.
- Ensure fair recruitment, free from discrimination.

Volunteers are recognised for their time and commitment through team events, awards, and regular appreciation.

4. Volunteer Expectations

Volunteers must:

- Treat staff, members, clients, and fellow volunteers with respect.
- Represent Uppertunity professionally and positively.
- Commit to non-discrimination and inclusivity.
- Provide advance notice if they cannot attend a shift or wish to leave.
- Adhere to Uppertunity's policies and procedures.
- Give constructive feedback about their experience.
- Engage in training and development opportunities.
- Be consistent and reliable, particularly due to the needs of the clients we work with.

5. Support for Volunteers

5.1 Induction

All volunteers receive an induction covering:

- Uppertunity's mission and values
- Role expectations
- Code of conduct
- Relevant policies and procedures

5.2 Training & Development

Volunteers are offered training opportunities to enhance their skills and confidence in their role.

5.3 Mentoring & Feedback

Each volunteer has access to regular mentoring and reflection with the manager to discuss progress, raise concerns, and explore future opportunities.

6. Volunteer Rights & Responsibilities

Volunteers have the right to:

- A safe and supportive environment.
- Clear guidance and supervision.
- Fair and equal treatment.
- Meaningful work that contributes to Uppertunity's goals.
- Express concerns or grievances and receive a fair resolution.

Volunteers are responsible for:

- Maintaining confidentiality.
- Following Uppertunity's policies (health and safety, safeguarding, GDPR, etc.).
- Reporting concerns to the manager.
- Acting in the best interest of Uppertunity and its clients.

7. Volunteer Involvement & Feedback

Volunteers can contribute ideas and feedback through:

- Regular meetings
- Anonymous suggestions
- Direct communication with management
- End-of-service exit interviews

We listen to volunteers and act on their feedback to improve experiences.

8. Legal & Policy Compliance

8.1 Recruitment & Selection

- Uppertunity has an open and fair recruitment process for volunteers.
- Volunteers must complete a basic application.
- Where necessary, volunteers must undergo a PVG (Protecting Vulnerable Groups) check.
- Two references are required for volunteers working with vulnerable groups.

8.2 Insurance

Volunteers are covered by Employers' and Public Liability Insurance, providing protection for injuries or accidents while volunteering.

8.3 Health & Safety

Volunteers must follow Uppertunity's Health & Safety policy to ensure a safe environment.

8.4 Grievances

Volunteers can raise concerns with their designated contact (manager). If unresolved, they can escalate the issue to the Board of Trustees.

8.5 Confidentiality

Volunteers must respect confidentiality agreements, ensuring client and organisational information remains private.

9. Volunteer Placement Process

Before starting, the manager will:

1. Define a volunteer role description.
2. Ensure the role benefits both the volunteer and organisation.
3. Discuss and agree on working hours, tasks, and supervision.
4. Obtain necessary background checks (PVG) if applicable.
5. Provide induction, training, and ongoing support.

10. End of Volunteering

- Volunteers can end their role at any time but should provide notice where possible.
- If a volunteer has completed at least two months, they can request a reference.
- An exit interview is offered to reflect on the experience and explore future opportunities.

11. Volunteer Expenses

11.1 What We Cover

Volunteers can claim expenses for:

- **Public Transport:** Fully reimbursed with receipts.
- **Taxis:** Reimbursed for those with disabilities.
- **Mileage:** Pre-approved travel costs may be reimbursed.
- **Other Costs:** Any other essential expenses must be pre-approved by the manager.

11.2 Refreshments

Volunteers receive **complimentary tea and coffee** while on-site, as well as one free soup on days they are volunteering, and 50% off menu items from Uppertunity.

12. Final Statement

Uppertunity is committed to ensuring a positive, fulfilling, and impactful volunteer experience. Volunteers are valued members of our community and essential to achieving our mission.

16. Risk Management Policy

1. Purpose

The purpose of this policy is to provide a structured approach to risk management within Uppertunity, ensuring that risks are identified, assessed, managed, and monitored effectively. This supports Uppertunity's charitable aims and purposes, safeguards its assets, ensures financial stability, and protects staff, volunteers, and clients.
This policy aligns with The Charities and Trustee Investment (Scotland) Act 2005 (the 2005 Act), which requires trustees to act with care, diligence, and in the best interests of the organisation. The Board of Trustees will exhibit a higher level of care in managing the organisation's risks than they would in their personal financial affairs.

2. Scope

This policy applies to all activities within Uppertunity and is a fundamental part of the organisation's risk management framework. It applies to:

- Trustees
- Employees
- Volunteers
- Third parties working with Uppertunity

All individuals associated with Uppertunity must be aware of risks, understand how to identify and report risks, and ensure they follow risk management processes.

3. Risk Management Framework

3.1 Responsibilities

The Board of Trustees

- Oversees risk policy and reviews risk reports.
- Approves actions to mitigate risks.
- Ensures appropriate governance structures are in place to manage risk.
- Convenes a special meeting if a critical risk arises.

The Manager

- Ensures that risk management is embedded in daily activities.
- Reviews risk reports and ensures continuous improvement in risk management.
- Ensures that staff and volunteers are trained in risk awareness.

Line Managers & Project Leads

- Ensure team members follow the risk management policy.
- Identify, assess, and report risks to the Manager.
- Implement risk treatment plans within their area of responsibility.

Employees & Volunteers

- Are responsible for identifying and reporting risks.
- Must follow all risk-related policies and procedures.
- Participate in risk awareness training as required.

4. Risk Management Process

Uppertunity follows a structured risk management approach to identify, assess, mitigate, and monitor risks. The process includes:

4.1 Identifying Risks

- Risks are identified by staff, volunteers, trustees, and stakeholders.

- Risks can be reported through risk assessments, team meetings, or incident reports.
- Risks should be categorised based on the following risk categories:

Risk Categories:

- **Financial:** Funding issues, cash flow risks, fraud, financial mismanagement.
- **Governance:** Board performance, conflicts of interest, decision-making issues.
- **External:** Economic conditions, funding changes, external partnerships.
- **Compliance & Regulations:** Legal obligations, GDPR compliance, safeguarding policies.
- **Operational:** Service delivery risks, IT failures, human error, equipment failures.
- **Reputation:** Public perception, social media risks, negative publicity.

4.2 Assessing Risks

- Risks are evaluated based on:
  - **Likelihood** (Rare, Unlikely, Possible, Likely, Almost Certain)
  - **Impact** (Insignificant, Minor, Moderate, Major, Critical)
- A risk matrix is used to prioritise risks.

4.3 Managing and Mitigating Risks

- Eliminate the risk where possible.
- Reduce the risk through controls, policies, and training.
- Transfer risk through insurance or partnerships.
- Accept low-level risks that are manageable.

4.4 Monitoring and Reviewing Risks

- The Risk Register is updated immediately when new risks are identified.
- The register is reviewed at each Board meeting, and outdated risks are removed.
- Urgent risks will trigger a special Board meeting for immediate action.

5. Risk Reporting

- Line Managers prepare risk reports for their areas, including risk treatment plans.
- The Manager reviews all risk reports before Board meetings.
- The Board reviews risk reports at each full meeting.
- If a critical risk is identified, a special Board meeting will be held.

6. Annual Risk Review

- This policy is reviewed annually by the Board to ensure it remains relevant and effective.
- The risk management process is assessed for continuous improvement.
- Any necessary updates to the policy are approved by the Board.

7. Conclusion

Effective risk management is essential to Uppertunity's success. By following this policy, Uppertunity can proactively manage risks, ensure financial and operational stability, and protect its people and mission.

17. Trustees Code of Conduct and Governance Framework

1. Introduction and Purpose

This Trustees & Governance Framework sets out:

- How Uppertunity is governed
- The roles and responsibilities of trustees (board members)
- The standards of behaviour expected from all trustees

Trustees of Uppertunity are responsible for the good governance of the organisation. They have a legal duty to act in the best interests of Uppertunity and its beneficiaries, prioritising these interests above any personal, professional, or financial interests.

Trustees must ensure that their decisions and behaviour:

- Reflect the values and mission of Uppertunity
- Comply with charity and company law and our governing documents
- Maintain public trust and confidence in the organisation

This framework incorporates the Trustee Code of Conduct and may be read alongside Uppertunity's governing documents and key policies.

2. Our Mission and Values

2.1 Mission

Uppertunity supports adults (aged 16 and over) with learning disabilities, autism, additional support needs, and mental health barriers to improve their wellbeing, build confidence, and develop purpose. We do this through creative workshops, group and community work, mentoring, skill development programmes, meaningful volunteering roles, and social events.

2.2 Values

Trustees share responsibility for upholding and modelling Uppertunity's values:

- **Inclusion** – creating spaces where everyone belongs
- **Empowerment** – supporting people to realise their potential
- **Creativity** – using creative approaches to support growth
- **Community** – building connections and togetherness
- **Respect** – valuing each person's unique journey

3. Governance Overview

Uppertunity is governed by a board of directors, who are also charity trustees.

The board is collectively responsible for:

- Setting and safeguarding Uppertunity's mission and strategic direction
- Ensuring activities align with our charitable purposes
- Overseeing financial sustainability and risk management
- Ensuring compliance with charity law, company law, OSCR and Companies House requirements, and our Articles of Association
- Appointing and supporting the Manager, who leads day-to-day operations

The board provides strategic leadership and oversight; the Manager is responsible for operational delivery, supported by staff and volunteers.

4. Board Composition and Appointment

4.1 Board Size and Diversity

- The board aims to have between five and nine trustees.
- Uppertunity seeks a diverse board that brings different skills, experiences, and perspectives, including lived experience of disability, neurodiversity, mental health, social enterprise, and community work.
- We particularly welcome trustees with skills in finance, governance, fundraising, marketing, operations, HR, or lived experience of the communities we serve.

4.2 Appointment and Induction

New trustees are appointed by the existing board following an appropriate recruitment and selection process (which may include an informal interview).

All new trustees receive an induction which includes:

- Introduction to Uppertunity's work, mission, and values
- Overview of trustee roles, responsibilities, and legal duties
- Copy of this Governance Framework and our Articles of Association
- Recent financial accounts and annual reports
- Current strategic plan and any key policies
- Opportunity to visit Uppertunity and meet staff, volunteers, and members (where appropriate)

4.3 Length of Service

- Trustees typically serve a three-year term, and may be reappointed for further terms (as permitted by the Articles of Association).
- Trustees are encouraged to let the Chair know if their circumstances change and they need to step down before their term ends.

5. Roles and Responsibilities

5.1 Collective Board Responsibilities

The board as a whole is responsible for:

Strategic Direction

- Setting and reviewing Uppertunity's vision, mission, and strategic objectives
- Ensuring activities align with our charitable purposes and values
- Making major decisions about the organisation's future

Financial Oversight

- Approving annual budgets and monitoring financial performance
- Ensuring proper financial controls and procedures are in place
- Reviewing and approving annual accounts
- Ensuring adequate reserves and financial sustainability
- Approving major financial commitments or investments

Risk Management

- Identifying and managing risks to the organisation, our staff, volunteers, members, and partners
- Reviewing the risk register at least annually
- Ensuring appropriate insurance is in place

Legal and Regulatory Compliance

- Ensuring compliance with charity law, company law, health and safety, data protection, and other relevant regulations
- Filing annual returns and accounts with Companies House and OSCR
- Ensuring effective safeguarding policies and procedures are in place

Supporting the Manager

- Appointing and supporting the Manager
- Setting objectives and reviewing the Manager's performance annually
- Providing appropriate supervision, support, and space for strategic thinking

Monitoring Impact

- Ensuring Uppertunity measures and reports the difference it makes
- Reviewing impact reports and acting on learning
- Approving annual reports and accounts

5.2 Individual Trustee Responsibilities

Each trustee is expected to:

- Act in the best interests of Uppertunity and its beneficiaries
- Attend and actively contribute to board meetings (minimum expectation: at least 75% of meetings annually)
- Read board papers and prepare for meetings (approximately one hour per meeting)
- Complete any actions agreed at board meetings
- Declare conflicts of interest and manage them in accordance with the Conflict of Interest Policy
- Use their skills and experience to support Uppertunity
- Champion Uppertunity positively in the wider community where appropriate
- Maintain confidentiality of board discussions and sensitive information
- Be available for occasional additional meetings or working groups where possible

Indicative minimum time commitment: 12–15 hours per year, plus any agreed involvement in working groups or specific projects.

6. Key Governance Roles

6.1 Chair of the Board

The Chair is appointed by the board and is responsible for providing leadership to the trustees. Key responsibilities include:

- Planning and chairing board meetings
- Ensuring meetings are productive, inclusive, and well-structured
- Working with the Manager to set meeting agendas and prioritise key issues
- Acting as main point of contact between board and Manager
- Supporting the Manager through regular one-to-one meetings (typically monthly)
- Conducting the Manager's annual review and setting objectives
- Representing Uppertunity externally when required
- Helping to manage conflicts or difficult situations at board level

The board should clearly confirm and record who is acting as Chair.

6.2 Treasurer

- No formal Treasurer is currently appointed.
- Financial oversight remains a collective board responsibility.
- The Manager shares updated management accounts and financial forecasts with the board every month.
- The board must ensure that it collectively understands these reports and can question and challenge where necessary.

6.3 Secretary / Governance Administration

- No formal Company Secretary is appointed.
- The Manager supports administrative governance tasks including:
    - Ensuring meeting papers are sent out in advance

- Taking and distributing minutes and follow-up actions
- Maintaining records of trustee details, terms of office, and register of interests
- Ensuring statutory returns are filed on time
- Keeping governance documents up to date

6.4 Manager

The Manager is appointed by the board and is responsible for the day-to-day management of Uppertunity. They:

- Lead and manage staff, volunteers, and operations
- Implement the strategic plan and board decisions
- Manage finances and ensure proper financial controls are maintained
- Ensure quality and safety of service delivery
- Build partnerships and relationships with funders, partners, and stakeholders
- Prepare reports and papers for the board
- Keep the board informed of important developments and risks
- Represent Uppertunity externally

The board is responsible for strategy and oversight; the Manager is responsible for operational delivery.

7. Trustee Code of Conduct

This section sets out the standards of behaviour expected of all trustees.

7.1 General Principles

Trustees must:

- Act in the best interests of Uppertunity and its beneficiaries
- Act with integrity, honesty, and accountability
- Treat others with respect and uphold Uppertunity's values
- Avoid bringing Uppertunity into disrepute through their actions or public statements

7.2 Meeting Attendance and Participation

Trustees are expected to:

- Attend at least 75% of board meetings in any given year (unless otherwise agreed)
- Notify the Chair in advance if they are unable to attend, with reasons where possible
- Come prepared, having read relevant papers in advance
- Actively participate in discussions and decision-making
- Support a culture of constructive challenge, learning, and reflection

7.3 Conflict of Interest and Ethical Behaviour

Trustees must:

- Declare any actual or potential conflicts of interest at the earliest opportunity
- Avoid situations where personal, financial, or professional interests could improperly influence their role
- Not accept gifts, favours, or hospitality that could reasonably be perceived as influencing their judgement
- Not misuse their position as a trustee for personal gain or to benefit family, friends, or close associates

All trustees must follow Uppertunity's Conflict of Interest Policy.

7.4 Confidentiality and Data Protection

Trustees must:

- Maintain confidentiality regarding sensitive matters discussed by the board
- Not share confidential information with third parties unless authorised by the board
- Comply with Uppertunity's **Data Protection and Privacy Policy** when handling personal or organisational data

7.5 Collective Responsibility and Decision-Making

Trustees are expected to:

- Support board decisions once they have been made, even if they held a different personal view during discussions
- Engage in respectful, constructive debate and challenge
- Make decisions in line with Uppertunity's mission, values, and beneficiaries' best interests
- Avoid undermining agreed board decisions publicly or privately

8. Board Meetings and Decision-Making

8.1 Frequency

- The board meets at least four times per year (quarterly).
- Additional meetings may be called when necessary.
- The Chair and Manager typically meet monthly between board meetings.

8.2 Notice and Papers

- Meeting dates should be set well in advance.
- Papers should normally be circulated at least one week before each meeting.
- Papers should be clear, concise, and highlight key issues and decisions required.

8.3 Quorum and Voting

- A quorum is five trustees, unless otherwise specified in the Articles.
- Decisions are usually made by simple majority vote of trustees present.
- Where possible, the board aims for consensus.

8.4 Minutes

- Minutes should record key discussions, decisions, and actions (including who is responsible and by when).
- Draft minutes should be circulated within two weeks of the meeting.
- Minutes are approved at the next board meeting and retained as part of Uppertunity's records.
- Key decisions and actions are summarised in regular board updates.

9. Working Groups

The board may establish working groups to focus on specific areas or projects (e.g. fundraising, events, property development, strategy).

Working groups:

- Have clear terms of reference (purpose, membership, authority, reporting)
- May include trustees, staff, volunteers, and people from the community
- Must include at least one trustee to maintain a governance link
- Report back regularly to the board, which retains overall responsibility for decisions

Working groups are a useful way to involve volunteers and can act as a pathway to future board membership.

10. Financial Governance

10.1 Financial Oversight

The board is responsible for ensuring Uppertunity is financially sound and sustainable. This includes:

- Approving annual budgets and monitoring income and expenditure
- Reviewing and approving annual accounts and reserves policy
- Monitoring cashflow and financial forecasts
- Approving significant financial commitments (e.g. property leases, major purchases)

10.2 Financial Authority Levels

The board agrees clear financial authority levels. As guidance:

- The Manager can approve expenditure up to £5,000 within an approved budget
- Expenditure between £5,000–£10,000 requires Chair approval
- Expenditure over £10,000 requires full board approval
- Any unbudgeted expenditure over £1,000 requires board approval

These thresholds should be reviewed periodically and adjusted as appropriate.

10.3 Financial Controls

Uppertunity maintains appropriate financial controls including:

- Separation of duties (different people authorising and processing payments)
- Regular bank reconciliations
- Clear financial policies and procedures
- Annual independent examination or audit of accounts (as required)
- Professional HR and health and safety support (currently through Citation)

11. Conflicts of Interest

A conflict of interest arises when a trustee's personal interests (or those of someone close to them) could influence, or be seen to influence, their decisions for Uppertunity.

All trustees must:

- Complete a register of interests on joining the board and update it when circumstances change
- Declare any relevant interests at the start of each meeting
- Withdraw from discussion and decision-making on matters where they have a conflict
- Not vote on matters where they have a conflict

The register of interests is reviewed at least annually.

12. Risk Management

The board is responsible for identifying and managing risks to Uppertunity.

We maintain a risk register which records:

- Key strategic, financial, operational, and compliance risks
- Likelihood and impact of each risk
- Mitigating actions and controls
- Named leads for each risk

The risk register is reviewed at least annually and updated as needed. Common risks include funding, staffing, safeguarding, reputation, premises, and governance capacity.

13. Key Policies

The board ensures Uppertunity has appropriate policies in place and that they are reviewed regularly. Essential policies include:

- Safeguarding policy and procedures
- Health and safety policy
- Data protection and privacy policy
- Equal opportunities and inclusion policy
- Financial policies and procedures

- Employment policies (including recruitment, disciplinary, grievance)
- Complaints procedure
- Risk management policy
- Reserves policy

Professional HR and health and safety support (currently through Citation) helps ensure policies are compliant and up to date.

14. Annual Governance Cycle

A typical annual cycle of governance activities:

Quarter 1 (July–September)
- Review and approve annual accounts
- File accounts and annual returns with OSCR and Companies House
- Review performance against the previous year's strategic plan

Quarter 2 (October–December)
- Review risk register
- Review key policies (on a rolling schedule)
- Begin budget planning for the next financial year

Quarter 3 (January–March)
- Review board effectiveness and skills mix
- Identify board recruitment needs and plan trustee recruitment if needed
- Hold a strategic planning or "away day" session

Quarter 4 (April–June)
- Approve budget for new financial year
- Update register of interests
- Plan for year-end accounts preparation

15. Reviewing Board Effectiveness

The board reviews its effectiveness at least annually, for example by:
- Reflecting on what is working well and what could be improved
- Checking whether the board has the right skills, diversity, and experience
- Reviewing whether meetings are productive, inclusive, and well-run
- Identifying any trustee training or development needs
- Reviewing this Trustees & Governance Framework and updating it when needed

This review may be carried out through a facilitated discussion, individual conversations, or a short survey.

16. Removal of a Trustee

16.1 Grounds for Removal

A trustee may be asked to step down, or removed from the board, where they:
- Consistently fail to fulfil their responsibilities, including:
    - Attending fewer than 75% of meetings without good reason; or
    - Missing more than three consecutive meetings without valid explanation
- Commit a serious or repeated breach of this Code of Conduct
- Fail to comply with the Conflict of Interest Policy
- Engage in gross misconduct, including fraudulent, abusive, or unethical behaviour
- Are disqualified from acting as a trustee or director under relevant law

Any removal must be consistent with Uppertunity's Articles of Association and applicable law.

16.2 Procedure

- Concerns are raised with the Chair (or another trustee if the concern relates to the Chair).
- The trustee is informed in writing of the concerns and the possible outcome.
- A formal review is carried out by the board (or a delegated panel of trustees).
- The trustee has the opportunity to respond in writing and/or attend a meeting to present their case.
- After considering all information, the board may vote on removal. A **two-thirds majority** of trustees (excluding the trustee concerned) is required to remove a trustee, subject to the Articles of Association.
- The decision and rationale are recorded in the minutes.

Where appropriate, the board may first explore supportive steps such as mentoring, training, or adjusted responsibilities before considering removal.

17. Support and External Resources

Uppertunity can draw on a range of external supports for governance:

- SCVO (Scottish Council for Voluntary Organisations) – guidance, training, and resources on charity governance and trusteeship.
- OSCR (Office of the Scottish Charity Regulator) – guidance on trustee duties, reporting, and compliance.
- Firstport / LaunchPad – training and workshops on governance and social enterprise.
- Trustee recruitment platforms such as TrusteeConnect, Digital Trustees, Specialist Volunteer Network and Reach Volunteering, which provide guidance on recruiting trustees.

Trustees are encouraged to make use of these resources and to undertake appropriate training.

18. Review of this Framework

This Trustees & Governance Framework (including the Trustee Code of Conduct) will be:

- Reviewed by the board at least every three years, or sooner if required
- Updated to reflect changes in law, best practice, or Uppertunity's structure and strategy

By accepting a role as a trustee of Uppertunity, individuals agree to:

- Adhere to this Framework and Code of Conduct
- Uphold Uppertunity's mission and values
- Act responsibly, ethically, and transparently
- Always act in the best interests of Uppertunity and its beneficiaries

18.Ethical Fundraising Policy

1. Introduction

Uppertunity is committed to ethical, transparent, and responsible fundraising practices. We recognise that how we fundraise directly impacts the trust of donors, supporters, beneficiaries, and the wider public. This policy outlines our commitment to fundraising that aligns with our values, legal obligations, and ethical principles.

We will always strive to be open, honest, fair, and compliant with UK laws and best practices, including the Code of Fundraising Practice and guidance from the Fundraising Regulator and Charity Commission.

This policy applies to trustees, employees, volunteers, fundraisers, and third parties acting on behalf of Uppertunity.

2. Ethical Fundraising Principles

2.1. Transparency & Honesty

- We will always provide clear, truthful, and accessible information about Uppertunity's work and how donations are used.
- All fundraising communications will be accurate, respectful, and never misleading.
- We will submit realistic budgets when applying for funding and use funds for their intended purpose.
- We will publish reports on our impact and financial accountability annually.
- We comply with all legal requirements for openness and honesty when engaging with donors and the public.

2.2. Donor Rights & Responsibilities

- Donors have the right to:
    - Know how their donations will be used.
    - Receive prompt acknowledgment and thanks.
    - Have their data protected in line with our Data Protection Policy.
    - Opt out of communications at any time.
- We will never pressure individuals into giving donations.
- We respect donors' wishes if they request anonymity.

3. Fundraising & Vulnerable Donors

We are committed to protecting vulnerable donors and ensuring that fundraising is always conducted responsibly. If an individual appears to be vulnerable, we will:

- Not pressure them into donating.
- Be respectful and patient, using clear and simple communication.
- Consider their communication preferences.
- Decline donations if we believe the donor is not competent to make the decision.

4. Representing Our Beneficiaries

- We will respect the dignity, rights, and privacy of beneficiaries when using their stories in fundraising materials.
- We will only use images, quotes, and stories with full consent.
- We will avoid exaggeration, exploitation, or misrepresentation.

5. Ethical Conduct for Fundraising Staff & Volunteers

- We have a zero-tolerance policy for discrimination, bullying, exploitation, or harassment.
- We maintain a culture of respect, equality, and inclusion.
- All fundraising staff and volunteers receive training in ethical fundraising and how to handle donations appropriately.

- A whistleblowing process is in place for staff and volunteers to report unethical or illegal fundraising practices.

6. Fundraising Due Diligence & Donation Acceptance

6.1. Due Diligence on Donors

Uppertunity will undertake due diligence on donors and major gifts to ensure:

- Donations do not come from illegal, unethical, or high-risk sources.
- The donor's activities align with Uppertunity's mission and values.
- Large anonymous donations are carefully assessed for risk.

If a donation may damage Uppertunity's reputation or compromise its integrity, the Board of Trustees may refuse or return the donation.

6.2. Restricted Donations

- If a donor requests their donation to be used for a specific purpose, we will respect their wishes.
- If we are unable to use the donation for the specified purpose, we will inform the donor and, if appropriate, offer a refund.

6.3. Refusal of Donations

We reserve the right to refuse donations if:

- The donation comes from illegal, unethical, or unknown sources.
- The donor's values conflict with Uppertunity's mission.
- Accepting the donation would compromise our independence or integrity.

7. Fundraising with Commercial & Corporate Partners

We will not partner with any business or commercial entity that:

- Acts in a way that is contrary to Uppertunity's values and charitable objectives.
- Produces or sells goods/services that could harm our beneficiaries or the environment.

For corporate partnerships:

- All agreements will be reviewed to ensure fairness and alignment with our mission.
- We will set up clear monitoring and review systems to evaluate the partnership's impact.
- The Board will disclose commercial partnerships in our Annual Report.

8. Fundraising Regulations & Trustee Responsibilities

Uppertunity's Board of Trustees will:

- Ensure compliance with Charity Commission guidance (CC3a).
- Follow the six principles in Charity Commission CC20 on trustee duties in fundraising.
- Provide regular oversight of fundraising activities and manage risks effectively.
- Address fundraising complaints promptly and effectively.

9. Fundraising Complaints & Whistleblowing

Uppertunity has a clear process for handling fundraising complaints:

1. Complaints should be directed to the Manager in the first instance.
2. If unresolved, the issue will be escalated to the Board of Trustees.
3. If further action is required, complaints can be referred to the Fundraising Regulator or Charity Commission.

We encourage whistleblowing in cases of:

- Fraudulent, unethical, or coercive fundraising.
- Misuse of donor funds.
- Any other breach of this policy.

19. Anti Bullying and Harassment Policy

1. Policy Statement

Uppertunity is committed to maintaining a safe, respectful, and inclusive environment for all staff, volunteers, clients, and visitors. Everyone has the right to be treated with dignity and respect and to work in an atmosphere free from harassment, bullying, and discrimination.

Harassment and bullying in any form will not be tolerated. This includes behaviour that occurs:

- Within the workplace (including remote work settings).
- During work-related activities, such as events, meetings, or training sessions.
- On social media platforms or any form of digital communication.
- Outside working hours if it impacts the work environment or relationships within Uppertunity.

This policy applies to all employees, contractors, volunteers, service users, board members, and visitors. Uppertunity recognises that harassment and bullying can have severe physical, emotional, and professional consequences. Workplace bullying can create a toxic environment, leading to stress, absenteeism, decreased productivity, and loss of self-confidence. This policy outlines the responsibilities of all individuals in preventing and addressing bullying and harassment effectively.

2. Key Principles

- **Zero Tolerance**: Uppertunity has a strict zero-tolerance policy on bullying and harassment. Any complaint will be taken seriously and investigated promptly.
- **Fair and Respectful Workplace**: All individuals are expected to contribute to a positive and supportive work environment.
- **Protection from Retaliation**: No one who raises a complaint will face victimisation or unfair treatment for doing so.
- **Confidentiality**: Complaints will be handled discreetly, and information will only be shared on a need-to-know basis.
- **Accountability**: Everyone has a responsibility to uphold this policy and report any misconduct they witness.

3. Definitions of Bullying and Harassment

3.1. What is Harassment?

Harassment is any unwanted behaviour that offends, humiliates, intimidates, or threatens an individual. It is the impact of the behaviour, rather than the intent, that determines whether harassment has occurred.
Harassment can be:

- **Physical**: Unwanted touching, intimidation, aggressive behaviour, physical assault.
- **Verbal**: Offensive remarks, malicious gossip, jokes, name-calling, threats, slurs, or unwanted propositions.
- **Non-Verbal**: Staring, offensive gestures, written communications, displaying offensive images, graffiti, or digital harassment.
- **Discriminatory**: Harassment based on age, gender, disability, sexual orientation, race, religion, or any protected characteristic.
- **Sexual Harassment**: Unwanted sexual advances, inappropriate comments, pressure for sexual favours, or sharing sexually explicit material.

3.2. What is Bullying?

Bullying is persistent, offensive, abusive, intimidating, malicious, or insulting behaviour that undermines, humiliates, or injures the person it is directed toward. Unlike harassment, bullying does not necessarily relate to a protected characteristic.

Examples of bullying include:

- Public humiliation or belittling remarks.
- Persistent and unjustified criticism.
- Setting unrealistic deadlines or unmanageable workloads.
- Spreading rumours or gossip.
- Deliberately excluding someone from workplace activities.
- Making threats or engaging in intimidating behaviour.
- Using social media or digital platforms to harass or intimidate someone ("cyberbullying").
- Setting someone up to fail (e.g., withholding important information).

3.3. What is Not Bullying?

Reasonable and lawful management actions are not considered bullying when conducted in a fair and appropriate manner. Examples include:

- Providing constructive feedback on performance.
- Assigning reasonable work duties.
- Disciplinary action taken under company policy.
- Making legitimate business decisions, such as restructuring or promotions.

4. Responsibilities

4.1. Responsibilities of All Staff, Volunteers, and Clients

- Treat others with respect and dignity.
- Refrain from engaging in any form of harassment or bullying.
- Report any witnessed harassment or bullying incidents.
- Foster an inclusive and positive work environment.

4.2. Responsibilities of Managers and Leaders

- Lead by example and actively prevent bullying and harassment.
- Ensure that all staff and volunteers are aware of this policy.
- Take all complaints seriously and respond promptly.
- Provide support to those affected by bullying or harassment.
- Implement appropriate disciplinary action when necessary.

5. Procedures for Reporting Bullying and Harassment

5.1. Informal Resolution

- If you feel safe doing so, speak directly to the person responsible and explain that their behaviour is unwelcome.
- If you are uncomfortable approaching the individual, seek support from a manager or trusted colleague.
- Managers should intervene early and attempt to resolve conflicts before they escalate.

5.2. Formal Resolution

If informal action is ineffective or inappropriate, a formal complaint should be made. Complaints should be submitted in writing and should include:

- Details of the incidents, including dates, times, and locations.
- Names of witnesses (if any).
- Any steps already taken to address the issue.

Who to report to:

1. Your manager – If appropriate, report the complaint to your direct supervisor.
2. Chair of Trustees – If the issue involves your manager, or if you are unsatisfied with their response, escalate to the Board of Trustees.
3. External Authorities – If necessary, complaints can be made to OSCR (Office of the Scottish Charity Regulator), ACAS, or the whistleblowing charity Protect.

Note: Complaints about serious criminal behaviour, such as assault, should be reported directly to the police.

6. **Investigations and Outcomes**

- **Confidentiality**: Investigations will be handled discreetly, and information will only be shared with those involved in resolving the issue.
- **Fair Process**: Both the complainant and the accused will have an opportunity to present their case.
- **Support Available**: Both parties may bring a support person or representative to meetings.
- **Possible Outcomes**:
    - Mediation or facilitated discussion.
    - Training or coaching to address inappropriate behaviour.
    - Formal disciplinary action, including warnings or dismissal for serious offences.

If a complaint is found to be made maliciously, disciplinary action may be taken against the complainant.

7. **Protection Against Retaliation**

Uppertunity strictly prohibits retaliation against any person who raises a concern under this policy. Anyone found to have victimised a complainant or witness will face disciplinary action.

8. **Training and Awareness**

- All employees will receive training on anti-harassment and bullying during induction.
- Regular refresher courses will be provided.
- Managers will receive additional training on conflict resolution and appropriate workplace behaviour.

9. **Record Keeping**

- Informal complaints will not be recorded unless they escalate into a formal complaint.
- Formal complaints and investigations will be documented and stored securely.
- Records of complaints will be kept for 12 months, unless required for longer by legal or regulatory authorities.

10. **Review and Monitoring**

- This policy will be reviewed annually by the Board of Trustees.
- Staff and volunteers will be consulted for feedback and improvements.
- Reports on trends and recurring issues will be analysed to improve workplace culture.

Uppertunity is dedicated to fostering a safe, respectful, and inclusive workplace where everyone can thrive. Bullying and harassment will not be tolerated, and all complaints will be taken seriously. If you have any concerns, do not hesitate to report them. You deserve to work and engage in an environment free from harassment and bullying.

For further guidance, contact your Manager, the Chair of Trustees, or an external authority such as ACAS or OSCR.

20. Use of AI

1. Purpose & Scope

This policy applies to all staff, volunteers, students, placements, board members, and anyone creating work under the Uppertunity name.

AI tools are increasingly common in everyday work. Uppertunity recognises that:

- AI can support efficiency and free time for more human, relational, and creative work
- AI should be used responsibly, ethically, and in line with our values
- AI use must never replace professional judgement, empathy, or interpersonal support
- AI has an environmental impact, and overuse should be avoided

This policy covers the use of AI tools only while completing work for Uppertunity. Personal use outside of work is not included.

2. Allowed Uses of AI

AI may be used for tasks that support efficiency, accessibility, creativity, and communication, including:

- Drafting emails, letters, newsletters, and social media posts
- Creating marketing or promotional wording (not images or automatic generated posters)
- Summarising research or reports (not replacing research itself)
- Drafting admin documents or templates
- Generating ideas for project planning, workshops, or events
- Helping create easy-read materials and accessible versions of documents
- Providing wording suggestions for funding applications (with human review)
- Clarifying information or providing definitions

AI is intended to support work, not replace the human skills, insight, and judgement of Uppertunity staff/volunteers.

3. Prohibited Uses of AI

AI must not be used for:

- Safeguarding decisions
- Mental health, wellbeing, or behavioural advice for members or families
- Decisions involving vulnerable adults
- Clinical, therapeutic, or diagnostic advice
- Writing formal reports without human review and proofreading
- Any decision that requires professional or interpersonal judgement
- Overuse that replaces creativity, reflection, or human-led work
- Unethical or misleading use, including pretending work was not AI-assisted
- AI-generated images or videos are not permitted at Uppertunity.

AI can support tasks, but cannot replace: human thought, judgement, support, or accountability. Creativity should remain human-led.

4. Confidentiality & Data Protection

To protect people's privacy and comply with data protection law:

You must not enter:

- Personal data that identifies someone

- Sensitive data (health, disability details, behaviour notes, safeguarding concerns)
- Names of members (first names allowed only if essential and non-sensitive)
- Addresses, phone numbers, financial details
- Confidential or internal documents not already public

You must:

- Remove or anonymise any identifiable information before using AI
- Use AI tools in line with Uppertunity's Data Protection and Privacy Policy
- Share outputs only after checking accuracy, tone, and appropriateness

5. Approved AI Tools

Uppertunity allows the use of a small number of AI tools to support writing, planning, accessibility, and administrative efficiency.

Approved for Use (Writing, Planning, Summarising, Accessibility):

ChatGPT

- Use for drafting emails, ideas, planning, accessible wording, and summaries.
- Caution: No personal/sensitive info. Always check accuracy and tone.

Google NotebookLM

- Use for summarising anonymised documents and extracting key points.
- Caution: Upload only fully anonymised files.

Microsoft Copilot

- Use for drafting emails, summarising Word/Excel files, and simple planning.
- Caution: Review accuracy; do not input sensitive data.

Canva AI – Magic Write only

- Use for short wording, layout ideas, and easy-read text.
- Caution: No AI images or videos. Check all content.

Claude (Anthropic)

- Use for policies, long documents, structured writing, and thoughtful planning.
- Caution: No identifiable data; review facts.

Grammarly AI

- Use for proofreading, tone adjustments, and clarity.
- Caution: Language editing only; avoid sensitive content.

Otter.ai (Transcription)

- Use for internal, non-sensitive meeting notes.
- Caution: No members, no safeguarding/HR topics, consent required.

Perplexity AI

- Use for research summaries with linked sources.
- Caution: Double-check accuracy; do not enter any personal data.

Zoom AI Companion

- Use for summaries of non-sensitive internal meetings.
- Caution: Never use during meetings involving members or sensitive information; announce before use.

Tools that are not permitted:

- AI-generated images, artwork, or videos (preserves creativity and authenticity)
- Any tool requiring upload of personal, sensitive, or confidential information
- Any tool without transparent data protection practices
- Deepfake, voice-cloning, or impersonation tools

Approval of new tools:

Other AI tools may be approved by the Manager following assessment of:

- Data protection compliance
- Environmental impact
- Intended purpose and necessity
- Accessibility benefits

Staff and volunteers must not use unapproved AI tools that store or share data externally without permission.

6. Safeguarding & Ethical Use

AI must never be used for safeguarding decisions, behavioural guidance, crisis responses, support plans, or anything that relates to a vulnerable adult's wellbeing.

AI cannot replace:

- Human judgement
- Professional responsibility
- Interpersonal support
- Relationship-based work
- Emotional or psychological insight

Where AI is used to support accessibility or communication, the final decision-making and judgement must always remain with a staff member.

7. Accessibility & Inclusion

Uppertunity supports using AI in ways that improve access and inclusion, including:

- Easy-read formats
- Visual supports
- Simplified text
- Video scripts
- Alternative communication formats

AI should help reduce barriers, never create new ones.

8. Accuracy, Bias & Human Review

All AI-generated content must be reviewed by the person who used the tool. Another staff member does not need to check it, but the user is personally responsible for:

- Reading the full output
- Checking facts and correcting inaccuracies
- Ensuring the tone matches Uppertunity's values
- Removing any biased, outdated, or harmful content
- Ensuring the output is appropriate for the audience

AI often generates confident but incorrect or biased information. Users must apply critical thinking.

9. Training & Experimentation

- AI training for staff, volunteers, and students is under review and may be developed in future.
- The Manager must approve any use of new AI tools not already in common use.
- Approved tools will be reviewed regularly to ensure they are safe and appropriate.

Example tools under consideration: ChatGPT, Claude, Google NotebookLM, Canva's AI assistant.

10. Environmental Considerations

AI uses significant energy. To minimise impact:

- Avoid unnecessary or repeated queries
- Do not use AI for tasks that can be done as quickly by hand
- Plan prompts carefully to reduce wasteful use
- Avoid “over-automation” and keep human-centred practices at the heart of work
- AI should support, not take over, human work.

11. Misuse, Risks & Accountability

If someone uses AI inappropriately, for example:

- Sharing personal or sensitive data
- Using AI for safeguarding decisions
- Publishing unreviewed or inaccurate information
- Using AI in a way that causes harm or reputational damage
- Misrepresenting AI-generated work as fully their own

Uppertunity will review the incident, which may involve:

- Supportive conversation and additional training
- Clear guidance and monitoring
- A formal warning
- Disciplinary or misconduct procedures, where harm or risk is significant

Uppertunity takes misuse seriously, especially where vulnerable adults may be affected.

12. Future Development & Policy Review

AI changes rapidly. Therefore:

- This policy will be reviewed annually
- It may also be updated sooner if there are significant changes in:
    - AI technology
    - Data protection law
    - Environmental impact evidence
    - Sector-wide guidance

Uppertunity remains committed to safe, ethical, inclusive, and environmentally conscious use of AI.