UPPERTUNITY

CREATING OPPORTUNITIES
BUILDING COMMUNITIES

Organisational Handbook

Contents

Updated on: 27/02/2025

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.

3. Our Offer: Practical Steps to Achieve Our Aims

1. Meaningful Weekly Groups
   Life skills, creative arts, sewing, drama, and active workshops to support personal development and connection.

2. Events and Outings
   Opportunities for individuals to connect socially, experience new environments, and strengthen their sense of belonging.

3. One-to-One Support
   Personalised check-ins, skills development, and guidance to help individuals grow and achieve their goals.

4. Volunteering and Inclusive Jobs
   Offering meaningful roles and employment opportunities that empower individuals and foster inclusion.

5. Gardening and Biodiversity Projects
   Practical projects to connect with nature, promote biodiversity, and raise climate awareness.

6. Climate-Conscious Catering
   Providing sustainable, environmentally conscious food services to educate and inspire action.

2. <u>Our Culture</u>

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. 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.

4. Safeguarding Vulnerable Adults Policy

1. Policy Overview

1.1 Named Safeguarding Person:
Danielle du Plooy (Manager)
Contact: danielledp@uppertunity.co.uk
1.2 Policy Location:
This document is available on our website: Uppertunity.org.uk and on our online HR/H&S system that staff have access to.
1.3 Purpose:
This policy outlines Uppertunity's commitment to safeguarding adults with care and support needs, ensuring they are protected from abuse and neglect while promoting their welfare and rights. It sets out clear responsibilities for Uppertunity staff and volunteers, ensuring effective working practices and compliance with safeguarding regulations. The practices and procedures within this policy are based on the relevant legislation and government guidance: Scotland - Adult Support and Protection Act 2007; Adult Support and Protection (Scotland) Act 2007 Code of Practice 2014.
1.4 Key Objectives:
- Understand adult safeguarding responsibilities.
- Promote the rights of vulnerable adults to make their own decisions.
- Ensure appropriate action is taken where an adult is at risk.
- Work in partnership with professionals and agencies to safeguard individuals.
1.5 Core Principles:
Uppertunity follows the six key principles of safeguarding:
1. **Empowerment** – Supporting informed decision-making.
2. **Prevention** – Taking proactive steps to reduce risk.
3. **Proportionality** – Responding appropriately to safeguarding concerns.
4. **Protection** – Taking action for those at risk.
5. **Partnership** – Collaborating with other organisations.
6. **Accountability** – Maintaining transparency and responsibility.

2. Duty of Care

- Uppertunity has a moral and legal duty to protect staff, volunteers, and service users from harm.
- Staff and volunteers must be aware of their behaviour and the emotional and physical wellbeing of clients.
- Personal contact outside of work (phone, email, social media) should be professional and appropriate. Any concerns should be reported to the manager immediately.

3. Who is a Vulnerable Adult?

A vulnerable adult is anyone 16 years or older who:
- Has a learning or physical disability.
- Has a physical or mental illness, including addiction.
- Is unable to protect themselves from significant harm or exploitation.
- Receives care services due to age, disability, or health conditions.
Under the Human Rights Act 1998, everyone has the right to live free from abuse and neglect.

4. Types of Abuse

Abuse is a misuse of power and control that causes harm or distress. Types of abuse include:
- **Physical** – Hitting, slapping, pushing, misuse of medication.
- **Sexual** – Unwanted sexual acts, harassment, indecent exposure.
- **Psychological** – Verbal abuse, threats, controlling behaviour, bullying.

- **Financial** – Theft, fraud, financial exploitation.
- **Neglect** – Ignoring basic needs, failure to provide necessary care.
- **Discriminatory** – Abuse based on race, gender, disability, or beliefs.
- **Modern Slavery** – Forced labour, human trafficking.
- **Self-neglect** – Neglecting personal hygiene, health, or safety.
- **Forced Marriage** – A marriage without the person's consent.

Abuse can happen anywhere and can be carried out by: family members, carers, professionals, neighbours, or strangers.

5. **Safe Recruitment**

- All staff and volunteers working regularly with vulnerable adults must provide two references and undergo a PVG check.
- Volunteers will not work alone with vulnerable adults.
- All Board members must obtain a PVG check.
- The manager ensures staff are suitable through reference checks and interview screening.
- Any convictions disclosed during PVG checks will be assessed on a case-by-case basis.
- New staff will shadow the manager or a lead worker for a minimum of two weeks.

6. **Training**

- All staff must complete safeguarding training, and sign a safeguarding declaration form.
- Safeguarding lead must attend PVG and disclosure training.
- Paid staff must complete training in:
  - Health & safety
  - Autism awareness
  - Mental health awareness
  - Learning disability awareness
  - Emergency first aid

7. **Designated Safeguarding Lead**

- The **Designated Safeguarding Lead** (currently **Danielle du Plooy**) is responsible for:
  - Implementing this policy.
  - Conducting PVG checks.
  - Ensuring staff and volunteers follow safeguarding procedures.
  - Liaising with authorities when necessary.

8. **Reporting Concerns**

All safeguarding concerns should be reported using the Respond, Report, Record, Refer, and Support method:
8.1 Respond & Report:
- Ensure immediate safety of the vulnerable adult.
- If urgent, call 999 or First Contact Team (Dundee: 01382 434019).
- Seek consent from the adult to report concerns unless they lack capacity.
- Do not investigate – document facts only.
8.2 Record:
- Use the Safeguarding Incident Form or write a detailed report.
- Include exact words spoken by the person involved.
- Keep records confidential.
8.3 Refer:
- The Designated Safeguarding Lead will decide next steps.

- Contact the person's guardian, care manager, or key worker.
- If necessary, report to Dundee Social Work Team or Police Scotland.

8.4 Support:
- Ensure the individual is supported emotionally and practically.
- Offer referrals to external support services.

9. Confidentiality & Information Sharing

- Staff and volunteers must keep information confidential unless there is a safeguarding risk.
- Information should only be shared with authorities when there is a legal duty to protect someone from harm.
- If an adult is at immediate risk, information must be shared even without their consent.

10. Managing Risks

- All activities involving vulnerable adults must be risk assessed.
- Clients must complete a referral form, noting any risks, allergies, and emergency contacts.
- Staff and volunteers must remain vigilant for signs of abuse.

11. Key Contacts

Organisation	Contact Number
Police Emergency	999
Police non-emergency	101
NHS24	111
Dundee Council (First Contact Team)	01382 434019
Angus Council (Access Line)	03452 777778

12. Policy Review

- This policy is reviewed annually and updated when legal or organisational changes occur.
- All staff and volunteers will be informed of any changes.

Uppertunity is committed to protecting vulnerable adults and fostering a safe, respectful, and supportive environment for all.

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	

5. 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.

6. 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.

7. <u>Workplace Mental Wellbeing Policy</u>

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.

8. 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.

9. Social Media Policy

1. Statement of Policy and Purpose

1.1. Uppertunity recognises that social interaction on the internet is an important and integral part of life. If used correctly, it offers valuable business opportunities; however, inappropriate use can impact productivity and pose business risks.

1.2. This policy governs the use of social media to protect the organisation's reputation, provide clear guidelines for employees, and ensure professional and ethical conduct online.

1.3. This policy applies to all employees, volunteers, directors, and contractors, whether using social media in a professional or personal capacity where it may impact Uppertunity.

1.4. This policy should be read alongside our Data Protection Policy.

2. Scope

2.1. This policy applies to:
- Employees, directors, contractors, and volunteers.
- All forms of social media, including but not limited to Facebook, Twitter, Instagram, LinkedIn, YouTube, TikTok, personal blogs, and online forums.
- Both official use (representing Uppertunity) and personal use where it may affect the organisation.

3. Official Use of Social Media

3.1. Only authorised individuals may post on Uppertunity's official social media accounts.

3.2. Media inquiries, including social media requests for official statements, must be directed to the Manager.

3.3. Employees and volunteers authorised to manage Uppertunity's social media must undergo training and follow branding, messaging, and engagement guidelines.

4. Personal Use of Social Media

4.1. Employees and volunteers may use social media for personal purposes but must:
- Ensure posts do not harm Uppertunity's reputation.
- Use personal, rather than work, contact details.
- Clarify that opinions are personal and not representative of Uppertunity when discussing industry-related topics.

4.2. Employees must not:
- Share confidential, proprietary, or sensitive information about Uppertunity, clients, employees, or partners.
- Use company branding, logos, or other intellectual property without permission.
- Post anything defamatory, discriminatory, or offensive.

5. Prohibited Use

Employees must not use social media in ways that:
- Breach confidentiality or data protection policies.
- Harass, bully, or discriminate against individuals.
- Damage Uppertunity's reputation or relationships with stakeholders.
- Infringe copyright, trademark, or intellectual property rights.
- Share misleading, defamatory, or false information about Uppertunity.

6. Monitoring and Compliance

6.1. Uppertunity may monitor employees' social media use where legally permitted, particularly when concerns arise about breaches of policy.

6.2. Any social media use that damages Uppertunity's reputation, violates laws, or breaches confidentiality will result in disciplinary action.

6.3. Employees must report any social media activity that may harm Uppertunity to the Manager.

7. Breaches of Policy

7.1. Violations of this policy may lead to:
- Removal of content in breach of policy.
- Disciplinary action, up to and including termination of employment.
- Legal action if social media use causes harm to Uppertunity or individuals.

8. Review and Amendment

8.1. This policy will be reviewed annually and updated as necessary to ensure compliance with best practices and legal requirements.

8.2. Employees and volunteers will be informed of any updates and are expected to comply with the latest version.

By using social media in connection with Uppertunity, employees, volunteers, and representatives agree to abide by this policy.

10.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:
  - o Advisory, Conciliation, and Arbitration Service (Acas)
  - o The whistleblowing charity *Protect*
  - o 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.

11. 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.

12. 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.

13.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.

14.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:
- o **Financial:** Funding issues, cash flow risks, fraud, financial mismanagement.

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

4.2 Assessing Risks
- Risks are evaluated based on:
  - o **Likelihood** (Rare, Unlikely, Possible, Likely, Almost Certain)
  - o **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.

15. Trustees Code of Conduct Policy

1. Introduction

Trustees of Uppertunity are responsible for the good governance of the organisation. As such, they have a 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 actions and decisions reflect the values and mission of Uppertunity, maintaining public trust and avoiding any activity that may bring the organisation into disrepute.

This Code of Conduct outlines the standards of behaviour and accountability expected from trustees to uphold the integrity of Uppertunity.

2. Key Responsibilities of Trustees

Trustees must:
- Act in the best interests of Uppertunity and its beneficiaries, prioritising these interests above all else.
- Follow Uppertunity's governing documents and comply with relevant laws, including charity regulations.
- Ensure proper use of the organisation's resources, making sound financial and operational decisions.
- Declare and manage conflicts of interest, following Uppertunity's Conflict of Interest Policy.
- Act collectively and in a transparent manner, making decisions in line with Uppertunity's objectives.
- Uphold the organisation's values, ensuring that Uppertunity remains inclusive, ethical, and effective.
- Respect confidentiality, handling sensitive information appropriately and responsibly.
- Maintain good relationships with fellow trustees, staff, volunteers, members, and stakeholders.
- Promote and protect Uppertunity's reputation, ensuring their actions support the credibility and integrity of the organisation.

3. Expectations of Trustees

3.1. Meeting Attendance & Participation
- Trustees are expected to attend at least 75% of board meetings in any given year.
- Absences must be communicated to the Chairperson in advance, with valid reasons provided.
- Trustees are expected to come prepared, having read necessary documents in advance of meetings.
- Active participation in discussions and decision-making is required.

3.2. Conflict of Interest & Ethical Behaviour
- Trustees must declare any conflicts of interest at the earliest opportunity.
- Trustees should avoid situations where personal, financial, or professional interests may compromise their role.
- Trustees must not accept gifts, favours, or hospitality that could influence their decision-making.
- Trustees must not misuse their position for personal gain or to benefit close associates.

3.3. Confidentiality & Data Protection
- Trustees must maintain confidentiality regarding sensitive matters discussed in board meetings.
- Confidential information must not be shared with third parties unless authorised by the board.
- Trustees must comply with Uppertunity's Data Protection Policy when handling personal or organisational data.

3.4. Collective Responsibility & Decision-Making
- Decisions made by the majority of the board should be supported by all trustees, even if personal views differ.
- Trustees should engage in constructive discussion and work collaboratively.
- All decisions should be made with Uppertunity's mission and beneficiaries in mind.

4. Removal of a Trustee

4.1. Failure to Fulfil Trustee Responsibilities
- If a trustee fails to attend more than three consecutive meetings without a valid reason, or fails to attend at least 75% of all meetings within a year, the board may vote to remove them.
- This decision will be made following a formal review by the board.

4.2. Breach of Code of Conduct

A trustee may be removed if they:
- Commit a serious breach of this Code of Conduct.
- Fail to comply with the Conflict of Interest Policy.
- Engage in gross misconduct, including fraudulent or unethical behaviour.

4.3. Removal Procedure
- The trustee will receive written notice outlining the concerns and reasons for potential removal.
- The trustee will have the opportunity to respond and present their case at a board meeting.
- A vote of two-thirds of the trustees is required to remove a trustee.

5. Commitment to Good Governance

By accepting a position as a trustee of Uppertunity, individuals agree to:
- Adhere to this Code of Conduct.
- Uphold the values and mission of Uppertunity.
- Be accountable for their actions and governance of the organisation.
- Act in the best interests of Uppertunity and its beneficiaries at all times.

This policy ensures that trustees act responsibly, ethically, and transparently, safeguarding the future of Uppertunity.

16. 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.

17. 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.