



## **Safeguarding Policy and Procedure, September 2026**

### **1.0 Policy statement**

This safeguarding policy outlines the commitment of Boleskine Community Care (BCC) to protecting children, young people, and protected adults from harm, abuse, and neglect. BCC is committed to creating and maintaining a safe and secure environment for children and protected adults in all areas of our operations.

This policy is in accordance with relevant Scottish legislation, including The Protection of Vulnerable Groups (Scotland) Act 2007 (commonly known as PVG); Children and Young People (Scotland) Act 2014; Data Protection Acts of 1998 and 2018, and General Data Protection Regulations; Human Rights Act 1998, and various United Nations Conventions. It applies to all individuals and organisations affiliated with BCC involved in activities concerning children and protected adults.

### **2.0 Equality statement**

BCC is committed to ensuring that all children, young people, and vulnerable adults have the same protection regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity. BCC has a commitment to commitment to anti-discriminatory practice and explicitly recognises the additional needs of those from minority ethnic groups and disabled people and the barriers they may face, especially around communication.

Please see BCC's Equality and Diversity Policy for further information.

### **3.0 Purpose**

Boleskine Community Care recognises the right of every individual to stay safe. BCC comes into contact with vulnerable adults and children through the following activities: weekly social events, volunteer driving scheme, Home Care and one-to-one support for members of our community.

This policy seeks to ensure that BCC undertakes its responsibilities in relation to safeguarding and establishes a framework to support Trustees, staff, external contractors and volunteers and clarifies BCC's expectations.

### **4.0 Scope and Definitions**

This policy applies to:

- Children and Young People: Anyone under the age of 18.

- **Adults at risk:** Refers to adults who are at risk of harm due to disability, mental disorder, illness, or physical or mental infirmity and are unable to protect themselves from harm or exploitation.

## **5.0 Responsibilities**

The BCC Trustee Board has overall responsibility for ensuring adequate resources, policies, and training are in place to support the safeguarding of children and vulnerable adults.

***The Lead or Designated Safeguarding Officer is the BCC Community Engagement Coordinator:*** They hold overall responsibility for implementing and upholding this policy. They will ensure the provision of adequate resources, training, and supervision to staff, volunteers, and member organisations engaged in activities involving children and protected adults. They also have responsibility for receiving reports, liaising with external statutory agencies (e.g., Police Scotland, local council social work), and managing records.

Staff and Volunteers have individual responsibility to remain vigilant, adhere to the code of conduct, and report any concerns immediately. All staff and volunteers affiliated with BCC are responsible for promoting the welfare and safeguarding of children and protected adults. They must familiarise themselves with this policy, promptly report any concerns or incidents, and participate in relevant training programs.

All BCC staff and Trustees are also required to abide by BCC's codes of conduct. All Trustees, staff and volunteers are expected to maintain professionalism at all times, acting in the best interests of children and protected adults and avoiding any actions that may compromise their safety or well-being. Any breach of these codes or of confidentiality could result in disciplinary action, up to and including termination of employment or termination of volunteer engagement.

## **6.0 What is abuse?**

Signs of abuse can often be difficult to detect. Many forms of abuse are also criminal offences and should be treated that way. The [Care and support statutory guidance](#) identifies ten types of abuse, these are:

- [Physical abuse](#)
- [Domestic violence or abuse](#)
- [Sexual abuse](#)
- [Psychological or emotional abuse](#)
- [Financial or material abuse](#)
- [Modern slavery](#)
- [Discriminatory abuse](#)
- [Organisational or institutional abuse](#)
- [Neglect or acts of omission](#)
- [Self-neglect](#)

<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

### **6.1 Physical abuse**

Physical abuse includes hitting, slapping, pushing, kicking, rough handling, misuse of medication, being locked in a room, inappropriate sanctions or force feeding, inappropriate methods of restraint, scalding or burning, and unlawfully depriving a person of their liberty.

### **6.2 Domestic abuse**

Domestic abuse is defined as any of the following:

- physical or sexual abuse;
- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse;
- psychological, emotional or other abuse

For the definition to apply, both parties must be aged 16 or over and 'personally connected' (Domestic Abuse Act, 2021).

Whatever form it takes, domestic abuse is rarely a one off incident and should instead be seen as a pattern of abusive and controlling behaviour through which the abuser seeks power over the victim. Domestic abuse occurs across society, regardless of age, gender, race, sexuality, wealth and geography. The figures from reported incidents show, however, that it consists mainly of abuse by men against women. Children are also affected both directly and indirectly and there is also a strong correlation between domestic abuse and child abuse.

### **6.3 Sexual abuse**

Sexual abuse includes rape and sexual assault or sexual acts or touching that the adult has not consented to or could not consent to, or was pressured into. It includes penetration of any sort, incest and situations where the alleged abuser touches the abused person's body (for example breasts, buttocks, genital area), exposes his or her genitals (possibly encouraging the abused person to touch them) or coerces the abused person into participating in or looking at pornographic videos or photographs. Abuse can also include inappropriate looking, sexual teasing or innuendo or sexual harassment. Denial of a sexual life to consenting adults is also considered abusive practice.

Any sexual relationship that develops between adults where one is in a position of trust, power or authority in relation to the other (for example day centre worker / social worker / residential worker / health worker) may also constitute sexual abuse

#### **6.4 Psychological or emotional abuse**

Psychological abuse includes 'emotional abuse' and takes the form of threats of harm or abandonment, deprivation of contact, humiliation, rejection, blaming, controlling, intimidation, coercion, indifference, harassment, verbal abuse (including shouting or swearing), and isolation or withdrawal from services or support networks. It can also involve failure to respect privacy. This can take place in person or online (cyber bullying).

Psychological abuse is the denial of a person's human and civil rights including choice and opinion, privacy and dignity and being able to follow one's own spiritual and cultural beliefs or sexual orientation. It includes preventing the adult from using services that would otherwise support them and enhance their lives or removal of items such as mobility or communication aids or intentionally needing someone alone when they need assistance. It also includes the intentional and / or unintentional withholding of information (for example information not being available in different formats / languages and so on).

#### **6.5 Financial or material abuse**

This includes theft, fraud, exploitation, internet scamming, pressure/ coercion in connection with an adult's financial affairs or arrangements including wills, property inheritance or financial transactions or the misappropriation of property, possessions or benefits. It also includes the withholding of money or the unauthorised or improper use of a person's money or property, usually to the disadvantage of the person to whom it belongs. Staff borrowing money or objects from a service user is also considered financial abuse.

Financial abuse can significantly impact on an adult's health and well-being, and research has shown that where there are other forms of abuse, financial abuse is likely to be occurring. According to the Office of the Public Guardian financial abuse is the most common form of abuse. Financial abuse can occur in isolation, but where there are also other forms of abuse, it is also likely to be a feature.

Financial abuse may amount to theft or fraud which the police should investigate. It may also require attention and collaboration from a wider group of organisations, including shops and financial institutions such as banks. Where abuse is perpetrated by someone who has the authority to manage an adult's money, the relevant body should be informed. In the case of a deputy or attorney this will be the Office of the Public [Guardian](#), and for appointees the [Department for Work and Pensions](#).

#### **6.6 Modern slavery**

Modern slavery encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their

disposal to coerce, deceive and force individuals into a life of abuse, and inhumane treatment.

### **6.7 Discriminatory abuse**

This includes discrimination on the grounds of race, faith or religion, age, disability, gender, sexual orientation and political views, along with racist, sexist, homophobic or ageist comments or jokes, or comments and jokes based on a person's disability or any other form of harassment. It also includes not responding to dietary needs and not providing appropriate spiritual support. Excluding a person from activities on the basis they are 'not liked' is also discriminatory abuse.

### **6.8 Organisational abuse**

Organisational abuse is the mistreatment, abuse or neglect of an adult by a regime or individuals in a setting or service where the adult lives or that they use. Such abuse violates the person's dignity and represents a lack of respect for their human rights. It can include: run-down or overcrowded establishments, authoritarian management or rigid regimes, lack of leadership and supervision, abusive and disrespectful attitudes towards people using the service and failure to respond to complaints

Organisational abuse occurs when the routines, systems and regimes of an organisation result in poor or inadequate standards of care and poor practice which affect the whole setting and deny, restrict or curtail the dignity, privacy, choice, independence or fulfilment of adults.

### **6.9 Neglect and acts of omission**

These include ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, and the withholding of the necessities of life such as medication, adequate nutrition and heating. Neglect also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the mental capacity to assess risk for themselves.

Neglect and poor professional practice may take the form of isolated incidents or pervasive ill treatment and gross misconduct. Neglect of this type may happen within a person's own home or in an organisation. Repeated instances of poor care may be an indication of more serious problems. Neglect can be intentional or unintentional.

### **6.10 Self-neglect**

Self-neglect includes a wide range of behaviour that threatens the person's own health and / or safety. It may include failure to act on the part of the person to provide themselves with adequate food, water, clothing and shelter. It may mean neglecting to care for one's personal health, hygiene or surroundings, including hoarding, taking adequate safety precautions and the misuse of drugs and alcohol.

Self-neglect differs from other types of abuse in that there is no third party involved. Furthermore, the definition of self-neglect excludes a situation in which a person who has capacity makes a decision to engage in acts that threaten their health and safety as a matter of choice.

### **7.0 Recruitment, vetting and training**

All BCC Trustees will undergo Disclosure Scotland checks via the Protection of Vulnerable Groups (PVG) Scheme and will not be confirmed as a Trustee until a satisfactory disclosure has been obtained.

All BCC paid staff engaging in regulated work involving children and protected adults will undergo thorough recruitment procedures, including Disclosure Scotland checks, in line with the Protection of Vulnerable Groups (Scotland) Act 2007. Individuals will not be confirmed in post until a satisfactory disclosure has been obtained. References will be sought and diligently verified for all prospective staff and volunteers involved in activities concerning children and protected adults.

Where relevant, all personnel will complete mandatory safeguarding training upon induction and take part in regular update, ensuring that it is regularly updated to reflect current legislation, best practices, and the identification of safeguarding concerns.

Support mechanisms will be in place to assist staff, volunteers, and relevant personnel in dealing with safeguarding issues, including access to counselling and debriefing services.

### **8.0 Reporting and responding to concerns**

- Immediate Risk: If a person is in immediate danger or requires medical attention, staff must call 999 for the police or an ambulance straight away.
- Stage 1 - Internal Reporting: Staff must not investigate concerns themselves. Instead, they must:
  1. Listen carefully and take the disclosure seriously.
  2. Reassure the individual that they have done the right thing, using clear language appropriate to the individual concerned.
  3. Record the disclosure objectively and report it swiftly to the Designated Safeguarding Officer who will make a formal record.
  4. The Designated Officer will investigate immediately.
  5. The Designated Officer will assess the information and refer the case to local multi-agency safeguarding hubs or social work departments as relevant.
- Stage 1 - If you have a concern about the Designated Officer, please contact the Chair of the BCC Trustee Board.

- Stage 2 - If you are unhappy with BCC's response contact local authority for advice at The Highland Council, Glenurquhart Road, Inverness, IV3 5NX Telephone - 01349 886 606 If the allegation cannot be resolved internally.
- BCC recognises its legal duty to report any concerns about unsafe practice by any of its paid staff or volunteers to the Independent Safeguarding Authority (ISA).

***Any safeguarding concerns or incidents involving children or protected adults must be immediately reported to the Designated Safeguarding Officer within BCC on 01456 486 247.***

All concerns will be treated seriously, promptly investigated, and appropriate action will be taken, following statutory guidelines and local procedures. BCC will cooperate fully with statutory agencies, such as the police or social services, as required.

## **9.0 Recording**

All complaints will be recorded online in a safe shared area and only be accessible by relevant staff and Trustees to maintain confidentiality.

## **10.0 Confidentiality and Data Protection**

BCC will handle all safeguarding concerns and records with strict confidentiality, ensuring compliance with relevant data protection legislation. Information will be shared on a need-to-know basis, and consent will be obtained when appropriate and in accordance with legal requirements.

## **11.0 Review and Monitoring**

This policy will undergo an annual review or as necessary to ensure its effectiveness and compliance with current legislation. Regular monitoring and evaluation will be conducted to assess the implementation of safeguarding measures and identify areas for improvement.

## **12.0 Dissemination of the Policy**

This policy will be readily available to all staff, volunteers, member organisations, service users, and relevant stakeholders. It will be communicated through training sessions, staff inductions, and prominently displayed within BCC's premises and digital platforms.

**This policy will be checked annually and will be fully reviewed every two years.**

### ***Version control***

| <b>Version number</b> | <b>Change or update - last review date</b> | <b>Author or owner</b> | <b>Approved by BCC Trustees</b> |
|-----------------------|--------------------------------------------|------------------------|---------------------------------|
| <b>1.0</b>            | <b>15th September 2026</b>                 | <b>Rachel Burn</b>     | <b>Katherine Grant</b>          |

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|--|-----------------------------------------------------|--|--|
|  | <b>Next check date<br/>September 2027</b>           |  |  |
|  | <b>Next full review<br/>date September<br/>2028</b> |  |  |

**Further details:**

<https://www.gov.scot/publications/protection-vulnerable-groups-scotland-act-2007-section-35-2-3/>

<https://www.gov.scot/publications/children-young-people-scotland-act-2014-national-guidance-part-12/pages/3/>

<https://www.gov.uk/data-protection>

<https://www.legislation.gov.uk/ukpga/1998/42/contents>