

## SDS Safeguarding Policy 2025

Descriptor	Changes made	Date	Version
Policy first implemented	-	Jan 2019	0.1
Policy Review	Reviewed September 2020 – EQIA completed and minor adjustments made to the policy. Anticipated updated protection guidance from Scottish Government not available as delayed.	Sept 2020	0.2
Policy Review	Updated following publication of the Scottish Government Child Protection Guidelines - refresh	Nov 2022	0.3
Policy Review	Minor updates including additional references to key external documents and policies	April 2025	0.4

Name of policy being superseded (if applicable)	Child Protection Policy previous version - 2015
Related policies	Protecting Vulnerable Groups (PVG) Policy, Code of Conduct, Whistleblowing Policy and Procedure, Data Protection, Retention and Disposal Policy for CIAG, Records Management
Related SOPs	Child Protection Procedure, Vulnerable Adults Protection Procedure, Partnership Working in Schools and Colleges, School – Service Offer Guidance Document, Next Steps -ServiceOffer Guidance Document
Equality Impact Assessment completed	Yes
Intended Audience	SDS employees and teams who have contact with children, young people and vulnerable adults.
For publication	Internal and external publication
Team responsible for policy	National CIAG
Policy owner contact details (email)	Senior Director Delivery
Policy due for review (date)	April 2027

<b>Policies should have a clear purpose and perform at least one of the following functions. Please identify all the functions this policy performs.</b>	<b>If statement applies, please mark with an X below</b>
Outline how we allocate limited resources to deliver services or outcomes	
Outline how SDS adheres to legislation, statutory duty etc.	X
Ensure fair and consistent allocation of benefits	
Protect organisational assets, including data	
Define expectations around the employee/employer relationship	
Other (please specify)	

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## 1. Policy summary

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The policy describes SDS obligations to safeguard and protect vulnerable groups. Vulnerable groups are defined as children, young people and vulnerable adults who use SDS services.

The document should be read in conjunction with the [SDS Child Protection & Vulnerable Adults Protection procedures](#) which provide operational guidance on dealing with disclosures for employees who work with these groups.

## 2. Policy purpose and objectives

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This policy describes the SDS approach to ensuring the protection and safeguarding of children, young people and vulnerable adults at risk of harm. It sets out a protective layering approach where harm prevention, in the context of overall wellbeing, is at the heart of our delivery.

SDS will:

- Inform colleagues working for (or on behalf of) SDS of their responsibilities with regard to child and adult protection and how they will be supported to meet these.
- Inform members of the public, customers and partners about our obligations under child and adult protection and how we intend to meet them.

This policy should be read in conjunction with both the SDS Child Protection Procedure and SDS Vulnerable Adults Protection Procedure which help employees recognise, respond, refer and record disclosures in the event of a child or vulnerable adult wellbeing/welfare concern.

## 3. Strategic context

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“Harm” means the ill treatment or the impairment of the health or development of a child, including, for example, impairments suffered as a result of seeing or hearing the ill treatment of another. In this context, ‘development’ can mean physical, intellectual, emotional, social or behavioural development and ‘health’ can mean physical or mental health”.

*National Guidance for Child Protection in Scotland 2023*

SDS has a duty and commitment to protect vulnerable groups who access its services from significant harm. This is achieved by providing training and support to employees so that they can adhere to protection principles at all times. Given the organisation delivers many of its services directly to children, young people and on occasion to vulnerable adults, it is vital to ensure that employees feel capable and confident to report any concerns to the relevant legislative authorities speedily and without delay.

The SDS response to child protection is informed by the UN Convention on the Rights of the Child (UNCRC), emerging practice around contextual safeguarding and also the Children and Young Person (Scotland) Act 2014, which enshrine the principles of GIRFEC (Getting it Right for Every Child) in law. The principles of GIRFEC apply to employees of SDS in a child protection context. These are:

- Putting the needs of children and young people first.
- Ensure that children and young people are listened to and understand decisions that affect them; and
- Ensure that they get the appropriate co-ordinated support needed to promote, support and safeguard their wellbeing, health and development.

The Scottish Government National Guidance on Child Protection (updated 2023) also set out inter-agency values and standards which organisations should adhere to when dealing with child protection matters. The SDS approach is also informed by these

These include:

- Safety and Rights (e.g. Equally Safe 2023 – preventing & eradicating violence against women and girls)
- Child’s Experience
- Trauma-Informed Practice
- Culture, Community and Family Context
- Engagement and Working Together

- Family Support and Child Protection
- Inequalities
- Supporting the Workforce

SDS may also receive requests (although in relatively small numbers) to support the work of Prevent which is the UK government strategy for preventing young people being drawn into terrorism. Prevent Multi Agency Partnerships (PMAPs) operate within a safeguarding context to help assist individuals.

The SDS response to adult protection is informed by the principles of the Adult Support and Protection (Scotland) Act 2007 and revised Code of Practice (2022) which states that any public body or staff members must, if relevant, have regard to:

- The wishes and feelings of an adult.
- The views of an adult's nearest relative, carer, guardian, attorney or other person who has an interest in the adult's well-being or property.
- The importance of an adult's participation and providing them with information and support to enable them to participate.
- Ensuring that a vulnerable adult is not treated less favourably than any other adults in a comparable situation.
- An adult's abilities, background and characteristics.

## 4. Definitions

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**SDS employees:** an employee is a person employed under a contract of employment with SDS, this can include permanent, fixed term, Modern Apprentice and other trainee contracts.

**School:** any educational establishment which a child might attend.

**Post – 16 learning and training establishments/provision:** any training providers, colleges for example.

**Children – The Child and Young Person Act (2014):** defines a 'child' or 'young person' as: anyone aged under 18 years of age). The extension of the use of the term 'child' beyond 16 years of age is to ensure that there is not an abuse of the position of trust that exists in a position of trust relationship. Where a young person aged 16-18 requires protection it must be noted that the Adult Support and Protection (Scotland) Act 2007 legislation may apply.

**Vulnerable Adult:-** The Adult Support and Protection (Scotland) Act 2007 defines adults at risk as: Adults, aged 16 and over, who:

- a) are unable to safeguard their own well-being, property, rights or other interests.
- b) are at risk of harm; and
- c) because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected.

The Act provides a definition of harm which is that:

**Harm** includes all harmful conduct and includes:

- a) conduct which causes physical harm.
- b) conduct which causes psychological harm (e.g., by causing fear, alarm or distress).
- c) unlawful conduct which appropriates or adversely affects property, rights or interests (e.g., theft, fraud, embezzlement or extortion).
- d) conduct which causes self-harm.

## 5. Scope

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This policy and associated procedures apply to all employees within SDS. Everyone involved in SDS business, including individuals who are seconded into SDS from another organisation (or employed through an agency) and voluntary placements (e.g., students and those on work experience) will be required to comply with this policy and associated procedures.

## 6. Policy detail

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### *Wellbeing*

Children, young people and vulnerable adults should:

- ***get the help they need***
- ***when they need it***
- ***for as long as they need it***

Supporting wellbeing is always paramount and practitioners working with children, young people and vulnerable adults must play their part in supporting wellbeing. In the context of children and young people this is the GIRFEC approach and [further details can be found here](#). For vulnerable adults, the SDS approach is informed by the [Act Against Harm resource](#).

### *Protection and Prevention of harm*

Every adult in Scotland has a potential role in ensuring that all children and vulnerable adults live safely and can reach their full potential. Child and vulnerable adult protection issues are an integral part of policy and practice within SDS and are not considered an optional activity.

It is the duty of SDS employees to report any suspicion of physical, sexual / emotional neglect / harm of children or vulnerable adults with whom they come into contact. Full details of how to deal with a child protection or vulnerable adults disclosure can be found in the Child Protection procedure/Adult Protection procedures which are stored within the Resources tab of Connect. All employees should make themselves familiar with these procedures.

### **SDS' corporate commitment to child/vulnerable adult protection**

SDS provides information, advice, mandatory training (CIAG teams) and guidance to support all SDS employees about their responsibilities in relation to the protection of children or adults at risk of harm. A comprehensive learning framework has been developed to support colleagues understand their responsibilities and act confidently if a concern arises. This framework also includes responsibilities for those colleagues working occasionally with vulnerable groups which may be through 1:1 interviews, focus groups/quality reviews e.g. SDS researchers, Service Designers and Skills Investment Advisers

At local authority level, SDS has implemented a network of Nominated Protection Officers (NPOs) who are responsible for providing oversight, assurance and supporting staff in the event of a disclosure.

Awareness and understanding of the Child Protection Procedure and Vulnerable Adult Protection Procedure is mandatory for SDS employees working directly with children or adults at risk of harm.

As a Protective layering organisation through HR resourcing, ensure that all new and existing employees who work with children and vulnerable groups are PVG checked under the Protection of Vulnerable Groups (Scotland) Act 2007

HR follow SDS protection procedures and have appropriate HR procedures (i.e., Disciplinary Policy and Procedure) to respond to situations where an allegation(s) is/are made against SDS employees concerning child protection/protection of adults at risk of harm.

To assist colleagues SDS will continue to:

- Refer to the Scottish Government national guidance as well as expert organisations in the field of safeguarding/protection to help inform policy, guidance and learning requirements.
- Provide appropriate learning and development through the SDS Protection Learning Framework to help build understanding and competence to deal effectively with any concerns, making onward referrals to the appropriate agencies as required.
- Ensure the policy/guidelines are contained within the SDS induction programme for new starts.
- Provide appropriate line management support following incidents if required and further personal support if required e.g. awareness of the Employee Assistance Programme as well as support line managers to develop the relevant knowledge and skills.
- Ensure SDS Partnership Agreements with schools contain reference to the school's guidelines and procedures in relation to wellbeing and child protection including the nominated person responsible for Child Protection within the school Senior Management Team.
- Ensure that when carrying out research with children (including online or paper surveys; focus groups and face to face interviews) colleagues are aware of the SDS Child Protection Procedure; have the appropriate level of disclosure and are fully aware of the legal and ethical issues surrounding research with children. Before carrying out research with children SDS employees will ensure consent is obtained from both the child and their parent or carer. Although a child under 16 is deemed capable to make decision about participation in research, consent of a parent ("parental consent") must also be obtained before carrying out research with any child under 16. Formal parental consent **and** the formal consent of the child are always required in these circumstances.
- Work with contracted learning providers, support the development of good practice regarding safeguarding and signpost to the relevant statutory agencies for further support as required.
- Ensure that PVG checks are part of the criteria for selection when engaging contractors if the work programme requires contact with children/adults at risk of harm. The onus will be on the SDS Business Unit requesting the procurement to specify this. Should a wellbeing issue arise in these circumstances, the matter will be referred to the appropriate statutory agency. SDS staff policies do not cover third party contractors therefore the contractor policies and procedures will apply thereafter.
- Ensure students on placement/work experience participants are aware of the SDS Policy and SDS Guidelines covering safeguarding and protection as part of their induction. Should a wellbeing issue arise in these circumstances, the matter will be referred to the appropriate statutory agency and the university/school procedures will apply in dealing with



student/pupil thereafter.

- Where appropriate, bring this policy and associated procedures to the attention of the public, relevant agencies and young people and their parents/carers.

This policy will be reviewed every two years.

## 7. Further guidance

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For practice-level guidance on dealing with disclosures employees are required to follow the [SDS Child Protection Procedure or Vulnerable Adults Protection Procedure.](#)