



Bike for Good Safeguarding Policy

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Scope of the Policy

What is Safeguarding?

Safeguarding is the action that is taken to promote the welfare of children and adults at risk of harm (hereafter referred to as people at risk) and protect them from harm.

Safeguarding means:

- preventing harm to people at risk's health or development
- protecting people at risk from harm and maltreatment
- ensuring people at risk benefit from the provision of safe and effective care
- taking action to enable all people at risk to have the best outcomes.

Definitions

Safeguarding children is defined as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Safeguarding vulnerable adults is defined as:

- Protecting the rights of adults to live in safety, free from abuse and neglect
- People and organisations working together to prevent and stop both the risks and experience of abuse or neglect
- People and organisations ensuring adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action
- Recognising adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or wellbeing

Who is this policy for?

It is our duty as an organisation to protect the welfare of all our staff, volunteers, community members and customers. **We believe that any individual can be vulnerable in a given set of circumstances, and as such we incorporate all participants and team members of Bike For Good into this policy, regardless of age or other factors.**

We also believe that **safeguarding is the responsibility of everybody** within Bike for Good. All employees, sessional workers and volunteers have a duty of care for those around them, and **where they have concern** for the safety or well being of another

individual they should **duly report this to one of the Designated Safeguarding Officers** (named below).

Our Designated Safeguarding Officers (DSO's) are

Name	Email	Phone
Gail Murray	gail@bikeforgood.org.uk	0141 248 5409
Peter Jahn	peter.jahn@bikeforgood.org.uk	0141 248 5409
Kasia Sokulska	Kasia@bikeforgood.org.uk	0141 248 5409
Chris Martin	christopher.martin@bikeforgood.org.uk	0141 248 5409

Dealing with Concerns

If you have a concern:

Key Message
If an employee or volunteer has concerns about a member of staff, a volunteer, a sessional worker/partner, or a member of the public this should be reported immediately to one of the Designated Safeguarding Officers (named above).

If it is not appropriate to speak to any of the DSOs for any reason, please speak to one of the team leads. **You do not have to be certain** that the individual is at risk in order to speak to your Safeguarding Officers, we recommend **erring on the side of caution** and raising any worries you may have.

The Safeguarding Officer will then take this forward, reporting the concern to the relevant authorities if deemed necessary. **It is not your job, nor the job of the Safeguarding Officer, to investigate further.**

How concerns will be dealt with

Upon being informed of a safeguarding concern, the Safeguarding Officer **must act promptly**. Generally the first DSO to be informed will take the lead on the case, unless there is a reason otherwise. Where the parents/guardians/emergency contact of the individual concerned are not the cause of concern they should be the **first port of contact**.

Where it is thought that the person at risk in question is potentially at **immediate risk** of

significant harm, a referral will be made to the relevant authorities (i.e. social services, Police Scotland) **as a matter of urgency**. (Please see flowchart in Section 5 of this policy, and contact details in Section 6).

The Safeguarding Officer will **manage the situation on an ongoing basis**, putting any necessary monitoring or support in place for the individual concerned and relevant staff members, as well as being an ongoing point of contact for the individual, their family and the relevant authorities.

Concerns about children should be referred to the children's social care department of the local authority where the child lives. Concerns about vulnerable adults should be referred to local authority adult services.

A report detailing any incidents raised and how these were handled should then be **reported to the lead Trustee(s)** responsible for Safeguarding, currently Tom Brown. The Trustee(s) will then provide a **critical appraisal** of the handling of any incident, and work with the Safeguarding Officers to **implement any changes required** to policies or procedures as a result of this learning.

Recording and Reporting Procedures

The information given by the individual raising the initial concern should be recorded **as fully and accurately** as possible by the Safeguarding Officer in the 'Record of Cause for Concern' form.

All further information relevant to the concern/incident and any action taken by the Safeguarding Officer should also be recorded **in as much detail as possible** in the '*Safeguarding Chronology Sheet*'. This includes all contact that takes place with the relevant authorities, and any ongoing support and monitoring after the incident.

Safeguarding records will be stored electronically and securely and kept for a [period of 25 years](#), after which time they will be destroyed. In the case that concerns or allegations have been raised about an adult's behaviour around a person at risk, detailed records will be kept of all relevant information and actions taken. In keeping with [NSPCC guidelines](#), these should be kept securely until the individual reaches the age of 65.

Allegations Against Staff

In a situation where an allegation is made against an employee or volunteer of Bike for Good, immediate action must be taken. This includes reporting the matter to the police and social services as necessary.

In the case of a contracted member of staff, they will be unable to perform any duties involving interaction with people at risk while an investigation is underway. They may be offered alternative duties or advised to work from home if deemed appropriate, or alternatively will be suspended from all work duties with pay in line with our Disciplinary Policy. In the case of a freelance worker or volunteer, the person will be asked not to come to Bike for Good (unless invited) until the investigation is complete. This is not an accusation of guilt, but a protective precaution. Throughout the process, the individual

concerned will be issued with a point of contact within the organisation.

We Will Seek to Keep People at Risk Safe By:

Safer Recruiting

As an organisation, we strive to create a safe and positive environment by ensuring we are only recruiting staff and volunteers who are suitable to work with people at risk. Our process for this includes checking references and obtaining PVG memberships for those working with people at risk, as detailed fully in our [Recruitment & Selection](#) and [Disclosure](#) policies. The equivalent process for volunteers is detailed in our [Volunteer Recruitment and Supervision](#) policy.

Support and Supervision

Support and supervision is a two-way, regular and ongoing process to ensure effective service delivery which is participant-centred but also meets the expectations of the organisation. The process should also include supporting staff in their personal and professional development to build a safe and effective workforce. While the frequency may vary depending on the work role, Bike for Good strives to ensure that all employees, sessional staff and volunteers have regular supervision and are supported in ensuring the best outcome for all of our service users.

Staff Training

Bike for Good will ensure that the Safeguarding Officers receive designated officer training at least every 3 years. Further to this, one safeguarding officer (currently Kasia Sokulska) will be designated to keep up to date with changes to guidelines & advice.

Sessional staff and all employees must complete safeguarding training which will be arranged by the organisation. There will also be regular refresher training on safeguarding children and vulnerable adults, including on specific areas of risk and safeguarding practice.

On top of formal training, the DSO's will continue to promote Safeguarding check-ins at weekly team meetings as part of the agenda. Any concerns will be risk-assessed and reported as appropriate.

Lone Working with people at risk

Where possible, one-to-one working with people at risk is to be avoided. Ideally, a second staff member, volunteer or parent/carer should be present during activities with an individual person at risk. In the case of a one-to-one cycle training lesson, a parent should remain present on-site, as is conveyed in the booking information. Lone Working risk assessment is to be in place for instances where Lone Working takes place.

Please refer to our Lone Working Policy for information on relevant processes.

Contact with Service Users

Employees should ensure that all contact with service users under the age of 18 is through official work channels only. Personal contact details should neither be shared nor sought.

Digital Safeguarding

Online interaction with people at risk should be treated with similar precautions to offline interactions. This means that:

- Lone working (i.e. one-to-one contact) should be avoided where possible.
- Contact should only be during normal working hours and via official work channels, e.g. only staff email addresses or work phone numbers should be linked to any platforms used for online delivery/interactions with service users. The use of personal email addresses and phone numbers is not permitted.
- Consent for engaging in online delivery should be sought in cases where it would have been necessary for offline delivery (e.g. parental consent when engaging with those under the age of 16).
- When delivering sessions via video, employees should ensure they deliver these with a 'neutral' background, where nothing personal or inappropriate can be seen in the background.
- To ensure the privacy and security of our service users, online meetings/sessions with these groups MUST require a password for entry or admission to be granted by the host.
- Any concerns raised regarding the safety of a person at risk during online delivery should be reported directly to one of the Safeguarding Officers.

Uniform Return

Our brand and uniform come to be known as familiar and trustworthy symbols for those who engage in our services and could therefore be used to gain the trust of individuals at risk. As such, all line managers will support HR in ensuring the correct return of Bike for Good uniform at the end of employment, as per our termination paperwork.

Sharing this Policy

The DSO's will strive to ensure that this policy is not only read but is understood and put into practice as necessary by all members of the team. The policy and its content will be shared in staff/volunteer induction packs, on BrightHR, via email, verbally at team meetings, and through prominent signage throughout our workplaces too. The Safeguarding team will additionally provide training to the wider team on a variety of issues relevant to safeguarding on an annual basis.

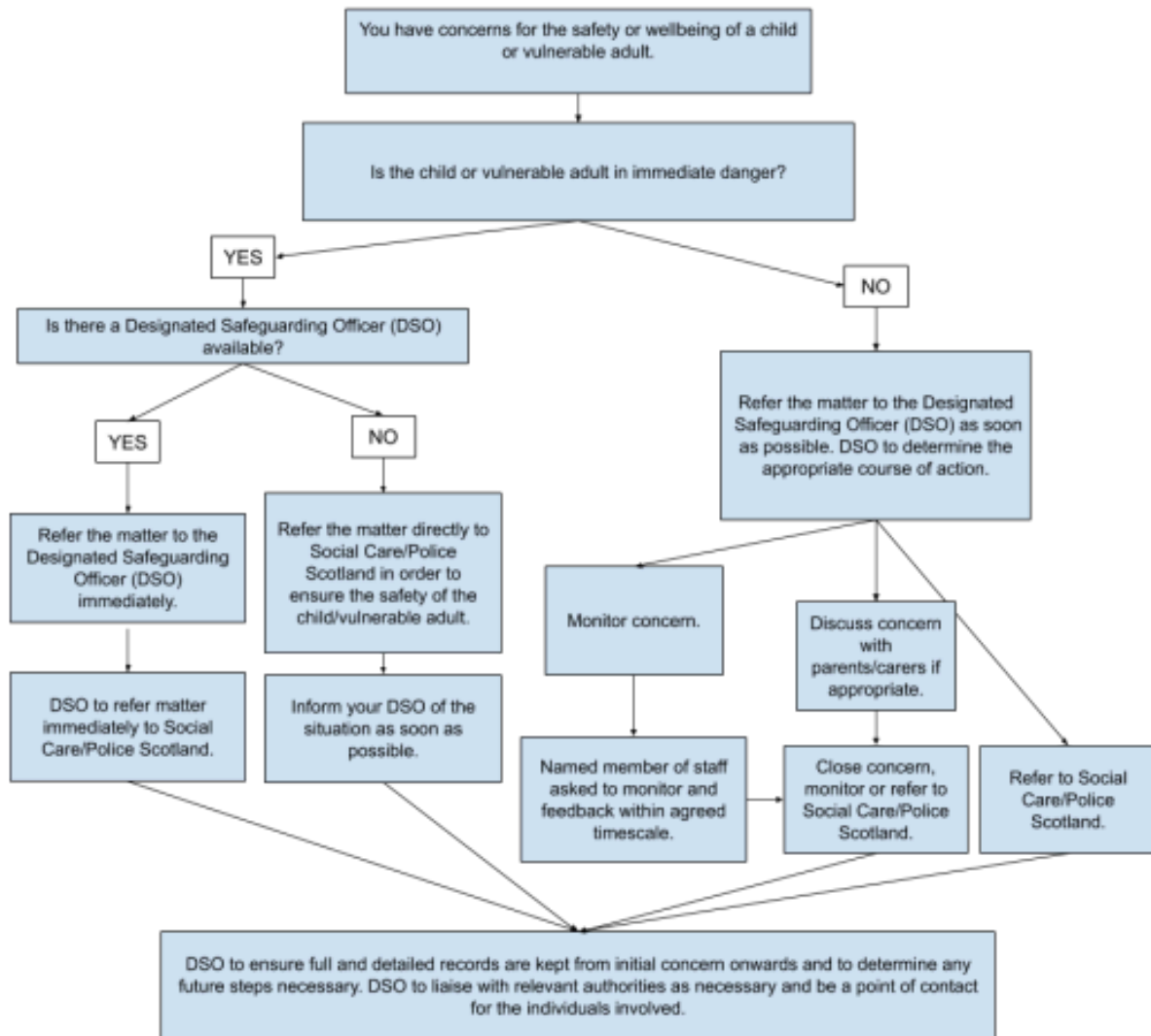
The policy will be reviewed quarterly at all meetings of the Safeguarding Working Group to ensure it is fit-for-purpose, and will be updated as necessary. This policy sits alongside our 'Safeguarding Action Plan' - a document that outlines which employees have

responsibility for overseeing the various elements of this policy.

Data Protection Act 2018

The organisation will treat all personal data in line with obligations under the current data protection regulations. Refer to Bike for Good Data Protection Policy below (Appendix 1)

Summary of the Safeguarding Process



(Needs changed updated?)

Relevant Contact Details

Where a concern is to be reported, Social Care at Glasgow City Council can be contacted on 0141 287 0555, or 0300 343 1505 outwith office hours. Alternatively, Scottish Police non-emergency can be contacted on 101.



Data Protection Policy for Employees, Workers, Volunteers & Consultants

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Introduction

Bike for Good needs to collect and use certain information about individuals.

These include customers, suppliers, service users, employees, volunteers, and other people the organisation has a relationship with or may need to contact.

This Policy describes how this personal data must be collected, handled and stored to comply with the **Data Protection Act 2018 & UK GDPR**.

Why this policy exists

This privacy policy ensures Bike for Good:

- Complies with UK GDPR and follows good practice
- Protects the rights of staff, customers, volunteers, suppliers and service users
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Policy scope

This policy applies to all staff, contractors, volunteers and other people working on behalf of Bike for Good.

It applies to all data that the company holds relating to identifiable individuals, which can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Any other information relating to individuals

Data protection risks

This policy helps to protect Bike for Good from data security risks including:

- Breaches of confidentiality, e.g. information being given out inappropriately.
- Failing to offer choice, e.g. all individuals should be free to choose how the company uses data relating to them.
- Reputational damage, e.g. the company could suffer if hackers successfully gained access to sensitive data.

Data Protection Principles

Personal data must be processed in accordance with six 'Data Protection Principles.' It must:

- be processed fairly, lawfully and transparently;
- be collected and processed only for specified, explicit and legitimate purposes;

- be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
- not be kept for longer than is necessary for the purposes for which it is processed; and
- be processed securely.

We are accountable for these principles and must be able to show that we are compliant.

How we define personal data

We will collect and use the following types of personal data about you:

- Recruitment information such as your application form and CV, references, qualifications and membership of any professional bodies and details of any pre-employment assessments;
- Contact details and date of birth;
- Contact details for your emergency contacts;
- Gender;
- Information about your contract of employment (or services) including start and end dates of employment, role and location, working hours, details of promotion, salary (including details of previous remuneration), pension, benefits and holiday entitlement;
- Bank details and information in relation to your tax status including your national insurance number;
- Identification documents including passport and driving licence and information in relation to your immigration status and right to work for us;
- Information relating to disciplinary or grievance investigations and proceedings involving you (whether or not you were the main subject of those proceedings);
- Information relating to your performance and behaviour at work;
- Training records;
- Images (whether captured on CCTV, by photograph or video);
- Any other category of personal data which we may notify you of from time to time.

‘Special categories of personal data’ are types of personal data consisting of information as to:

- Racial or ethnic origin
- Health
- Sexual orientation
- Any criminal convictions and offences

We may hold and use any of these special categories of your personal data in accordance with the law.

Examples of when we might process your personal data

We have to process your personal data in various situations during your recruitment, employment (or engagement) and even following termination of your employment (or engagement).

For example (see below for the meaning of the asterisks):

- to decide whether to employ (or engage) you;
- to decide how much to pay you, and the other terms of your contract with us;
- to check you have the legal right to work for us;
- to carry out the contract between us including where relevant, its termination;
- training you and reviewing your performance*;
- to decide whether to promote you;
- to decide whether and how to manage your performance, absence or conduct*;
- to carry out a disciplinary or grievance investigation or procedure in relation to you or someone else;
- to determine whether we need to make reasonable adjustments to your workplace or role because of your disability*;
- to monitor diversity and equal opportunities*;
- to monitor and protect the security (including network security) of the Company, of you, our other staff, customers and others;
- to monitor and protect the health and safety of you, our other staff, customers and third parties*;
- to pay you and provide pension and other benefits in accordance with the contract between us*;
- paying tax and national insurance;
- to provide a reference upon request from another employer;
- monitoring compliance by you, us and others with our policies and our contractual obligations*;
- to comply with employment law, immigration law, health and safety law, tax law and other laws which affect us*;
- to answer questions from insurers in respect of any insurance policies which relate to you*;
- running our business and planning for the future;
- the prevention and detection of fraud or other criminal offences;
- to defend the Company in respect of any investigation or litigation and to comply with any court or tribunal orders for disclosure*; and
- for any other reason which we may notify you of from time to time.

We will only process special categories of your personal data (see above) in certain situations in accordance with the law. For example, we can do so if we have your explicit consent. If we asked for your consent to process a special category of personal data then we would explain the reasons for our request. You do not need to consent and can withdraw consent later if you choose by contacting the data controller on the following email address: dataprotection@bikeforgood.org.uk

We do not need your consent to process special categories of your personal data when we are processing it for the following purposes, which we may do:

- where it is necessary for carrying out rights and obligations under employment law;
- where it is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent;
- where you have made the data public;
- where processing is necessary for the establishment, exercise or defence of legal claims; and
- where processing is necessary for the purposes of occupational medicine or for the assessment of your working capacity.

We might process special categories of your personal data for the purposes above which have an asterisk beside them. In particular, we will use information in relation to:

- your race, ethnic origin, religion, sexual orientation or gender to monitor equal opportunities;
- your sickness absence, health and medical conditions to monitor your absence, assess your fitness for work, to pay you benefits, to comply with our legal obligations under employment law including to make reasonable adjustments and to look after your health and safety.

We do not take automated decisions about you using your personal data or use profiling in relation to you.

Responsibilities

Everyone who works for or with Bike for Good has some responsibility for ensuring data is collected, stored and handled appropriately.

All that handle personal data must ensure that it is processed in line with this policy and UK GDPR principles.

However, these people have key areas of responsibility:

The Data Controller is responsible for:

- Keeping senior management updated about UK GDPR responsibilities, risks and issues.
- Reviewing all procedures and related policies, in line within an agreed schedule.
- Arranging training and advice for the people covered by this policy.
- Handling questions from staff and anyone else covered by this policy.
- Dealing with requests from individuals to see the data Bike for Good holds about them.
- Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.

Guidelines for Data Processors:

- The only people able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.
- Bike for Good will provide training to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used, and they should never be shared.
- Personal data should not be disclosed to unauthorised people, either within the company or externally.
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted or disposed of.
- Employees should request help from their line manager or the data controller if they are unsure about any aspect of data protection.

Data Storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the data controller by emailing:

dataprotection@bikeforgood.org.uk

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Employees should make sure paper and printouts are not left where unauthorised people could see them, like on a printer.
- Data printouts should be shredded and disposed of securely when no longer required.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be protected by strong passwords.
- Data should never be saved directly to laptops or other mobile devices like tablets or smartphones.
- All computers containing data should be protected by an antivirus and firewall.

Data will be retained for its useful period.

Data use

Personal data is of no value to Bike for Good unless the organisation can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, employees should ensure the screen of their computers are always locked when left unattended.
- Personal data should not be shared informally.
- Personal data should never be transferred outside the UK.
- Employees should not save copies of personal data to their own computers.

Data accuracy

The law requires Bike for Good to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that personal data is accurate, the greater the effort Bike for Good should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
- Staff should take every opportunity to ensure data is updated. For instance, by confirming a customer's details when they call.
- Bike for Good will make it easy for data subjects to update the information Bike for Good holds about them. For instance, via the company website.
- Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.

Your data subject rights

- You have the right to information about what personal data we process, how and on what basis as set out in this policy.
- You have the right to access your own personal data by way of a subject access request (see above).
- You can correct any inaccuracies in your personal data by contacting the Data Controller by emailing: dataprotection@bikeforgood.org.uk
- You have the right to request that we erase your personal data where we were not entitled under the law to process it or it is no longer necessary to process it for the purpose it was collected. To do so you should contact the Data Controller.
- While you are requesting that your personal data be corrected or erased or are contesting the lawfulness of our processing, you can apply for its use to be restricted while the application is made. To do so you should contact the Data Controller.

- You have the right to object to data processing where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop.
- You have the right to object if we process your personal data for the purposes of direct marketing.
- You have the right to receive a copy of your personal data and to transfer your personal data to another data controller. We will not charge for this and will in most cases aim to do this within one month.
- With some exceptions, you have the right not to be subjected to automated decision-making.
- You have the right to be notified of a data security breach concerning your personal data.
- In most situations we will not rely on your consent as a lawful ground to process your data. If we do however request your consent to the processing of your personal data for a specific purpose, you have the right not to consent or to withdraw your consent later. To withdraw your consent, you should contact the Data Controller.
- You have the right to complain to the Information Commissioner. You can do this by contacting the Information Commissioner's Office directly. Full contact details including a helpline number can be found on the Information Commissioner's Office website (www.ico.org.uk). This website has further information on your rights and our obligations.

Subject access requests

All individuals who are the subject of personal data held by Bike for Good are entitled to:

- Ask what information the company holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the company is meeting its UK GDPR obligations.
- Request to be removed from records.

If an individual contacts the company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller at dataprotection@bikeforgood.org.uk

The data controller will always verify the identity of anyone making a subject access request before handing over any information.

We must respond within one month unless the request is complex or numerous in which case the period in which we must respond can be extended by a further two months.

This is a free service unless the request appears extremely, unnecessarily excessive.

Disclosing data for other reasons

In certain circumstances, UK GDPR allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Bike for Good will disclose requested data. However, the data controller will ensure the request is legitimate, seeking advice from the company's legal advisers where necessary.

Providing information/Fair processing notice

Bike for Good aims to ensure that individuals are aware that their data is being processed and that they understand:

- How the data is being used
- How to exercise their rights

Bike for Good processes most data on the basis of having legitimate interests. Bike for Good will not request details for any other reason unless it is made specifically known

How to deal with data breaches

We have robust measures in place to minimise and prevent data breaches from taking place. Should a breach of personal data occur (whether in respect of you or someone else) then we must take notes and keep evidence of that breach. If the breach is likely to result in a risk to the rights and freedoms of individuals then we must also notify the Information Commissioner's Office within 72 hours.

If you are aware of a data breach you must contact your Line Manager and the Data Controller immediately and keep any evidence you have in relation to the breach.

dataprotection@bikeforgood.org.uk

Appendix 2

There are trained Mental Health First Aiders in Bike for Good who can provide a listening ear to anybody who is finding themselves in an emotionally difficult situation or crisis. It can be anybody from community members, volunteers and staff themselves.

We know that Bike for Good has many members of staff and it can be difficult knowing people by name. To make it as easy and discreet as possible we added a picture to each Aider's contact details.

Kasia Sokulska, kasia@bikeforgood.org.uk

Liz Henderson, elizabeth.henderson@bikeforgood.org.uk