



## **Kids Club Kampala Safeguarding Policy**

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## **Introduction**

### **Definitions of terms**

For the purposes of this Safeguarding Policy, all references to:

‘child’, ‘children’, ‘young person’, ‘young people’, ‘adolescent’ and ‘adolescents’ – whether singular or plural – are used interchangeably and are taken to refer to those under the age of 18 years, in accordance with the United Nations Convention on the Rights of the Child.

‘workers’, ‘staff’, ‘volunteers’, are used interchangeably and are taken to refer to anyone interacting with children on behalf of Kids Club Kampala.

‘vulnerable adults’ or ‘adults at risk’ are taken to refer to individuals aged over 18 who have needs for care and support and; is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

### **Scope and purpose of this policy**

This policy demonstrates Kids Club Kampala’s commitment to keeping safe all children and vulnerable adults with whom it works. Everybody has a responsibility for the safety of children and vulnerable adults and this policy will be followed by all staff, volunteers, board members of the organisation and followed and promoted by those in the position of leadership within the organisation.

The purpose of this policy and its procedures is to help protect the children and vulnerable adults we come into contact with and to ensure that staff and volunteers are aware of issues that can cause them harm and how to respond to concerns relating to the possibility of a child or vulnerable adult suffering harm. Kids Club Kampala acknowledges its duty to act appropriately to any allegations, reports or suspicions of abuse.

This policy has been drawn up in order to enable Kids Club Kampala to:

- promote good practice and work in a way that can prevent harm and abuse occurring;
- ensure that any allegations of abuse or suspicions are dealt with appropriately and the person experiencing abuse is supported; and
- stop abuse occurring.



This policy refers to the responsibilities of staff, volunteers and trustees of Kids Club Kampala UK, including those volunteering or visiting the work of Kids Club Kampala in Uganda. We recognize that definitions of safeguarding and child protection may vary between the UK and in Uganda, and when volunteering or visiting projects in Uganda Kids Club Kampala Uganda's safeguarding policy must be adhered to at all times as well. Kids Club Kampala Uganda's Safeguarding Policy is reviewed regularly as part of Kids Club Kampala UK's due diligence processes.

**This Safeguarding Policy sets out:**

1. Kids Club Kampala's principles for the protection of children and vulnerable adults.

Kids Club Kampala believes that child and vulnerable adult protection is both an individual and a corporate responsibility.

2. Kids Club Kampala's expectations in terms of behaviour and good practice for working with children and vulnerable adults.

Kids Club Kampala believes that everyone must take precautions and responsibility to help create a safe place for children, vulnerable adults and their protection. This begins with everyone being well informed and aware of safeguarding issues.

3. Kids Club Kampala's guidelines for responding appropriately if abuse of a child or vulnerable adult is alleged, disclosed, discovered or suspected.

Kids Club Kampala encourages openness about concerns relating to safeguarding matters because abuse thrives on secrecy. The guidelines in this policy explain what should be done about those concerns.

4. Kids Club Kampala's procedures for recruiting and hiring personnel both voluntary and employed.

Kids Club Kampala ensures that due diligence is done for the hiring of all staff and volunteers and follows the procedures set out in this policy to ensure that safeguarding children and vulnerable adults is an integral part of this process.



### **Safeguarding Statement:**

As members of Kids Club Kampala, we believe that:

1. Safeguarding of children and vulnerable adults is both an individual and a corporate responsibility.
2. All children and vulnerable adults have equal rights to protection from abuse and exploitation and inequalities should be challenged.
3. All children and vulnerable adults should be encouraged to fulfill their potential.
4. The welfare of children and vulnerable adults is paramount.
5. Everyone must take responsibility to help create a safe place for children and vulnerable adults and support their care and protection. This begins with everyone being well informed of safeguarding issues and procedures.
6. Openness must be encouraged about concerns relating to safeguarding matters because abuse thrives on secrecy.
7. All staff and volunteers of Kids Club Kampala owe a duty of care to the children and vulnerable adults with whom they work and a responsibility to meet minimum standards of protection for the children and vulnerable adults in their care.

Therefore, all members of Kids Club Kampala agree on the following policy statement:

Kids Club Kampala has zero tolerance towards abuse and will not tolerate any form of abuse wherever it occurs and whoever is responsible. Kids Club Kampala is fully committed to safeguarding the welfare of all children and vulnerable adults. It recognises it's responsibility to take all reasonable steps to promote safe practice and to protect children and vulnerable adults from harm, abuse, neglect and exploitation. All staff and volunteers will endeavour to work together to encourage the development of an ethos which embraces difference and diversity and respects the rights of children, young people and vulnerable adults.

### **Kids Club Kampala will:**

1. ensure that all staff and volunteers understand their legal and moral obligations to protect children and vulnerable adults from harm, abuse, neglect and exploitation;
2. develop best practice in relation to the recruitment of all workers;
3. ensure that all staff and volunteers understand their responsibility to work to the standards and procedures detailed in our Safeguarding Policy;
4. ensure that all staff and volunteers understand their obligations to report care or protection concerns about a child/vulnerable adult, or a worker's conduct



- towards a child/vulnerable adult, to a designated person for safeguarding, this person will be known as the Safeguarding Officer(s);
5. ensure that all procedures relating to the conduct of workers are implemented in a consistent and equitable manner;
  6. ensure that the Safeguarding Officer(s) understands his/her responsibility to refer any safeguarding concerns to the statutory agencies (i.e. Police and/or Social Services);
  7. provide opportunities for all workers to develop their skills and knowledge particularly in relation to the care and protection of children and vulnerable adults;
  8. ensure that children and vulnerable adults are enabled to express their ideas and views on a wide range of issues and will have access to this Safeguarding Policy;
  9. ensure that parents/carers are encouraged to be involved in the work of Kids Club Kampala and, when requested, have access to all guidelines and procedures;
  10. make known the name(s) of the organisation's Safeguarding Officer(s) so that people know who to contact with any concerns.

## **Safeguarding Officers and Procedure**

### **Safeguarding Officers**

- Kids Club Kampala has two appointed Safeguarding Officers, one at senior management level and one at board level.
- Safeguarding Officers details will be kept up to date on the Safeguarding Register and in the event of a change of officer all staff, volunteers and relevant people will be notified.
- All staff and volunteers are made aware of the names and contact details of both Safeguarding Officers during their safeguarding training and these details are readily available in the event of a safeguarding concern arising.

Senior Management Safeguarding Officer: Olivia Barker White, CEO, olivia@kidsclubkampala.org.

Board Safeguarding Officer: Rachel Read, Trustee; rachelread69@googlemail.com.  
If Rachel is not available responsibility will be taken by Chair of Trustees



## **Safeguarding Concerns**

A safeguarding concern is when a person is concerned about someone's well-being. These concerns may be about a child or adult. Everyone has the responsibility to be aware of and report any safeguarding concerns they may have. This could be a disclosure from a child or adult or it could be a concern that someone has about a child or vulnerable adult.

Please also see sections 3 and 4 for more detail about signs and definitions of abuse of children and vulnerable adults.

## **Safeguarding Procedure**

The following outlines Kids Club Kampala's Safeguarding Procedure. This procedure is to be followed by all staff and volunteers when a safeguarding concern arises.

- When a safeguarding concern arises all staff and volunteers are required to contact a safeguarding officer. In the first instance this is to be the Safeguarding Officer at management level.
- Details of the safeguarding concern will be documented in Kids Club Kampala's Safeguarding Register.
- Any immediate actions that need to be taken to protect a child or vulnerable adult will be taken in a considered manner.
- If deemed necessary, Kids Club Kampala will report the concern to the authorities.
- The Safeguarding Officer at management level will pass on the information about the safeguarding concern to the board level Safeguarding Officer within 1 week of the concern being reported. If necessary, the concern will then be made known to the Chair of the board of trustees.
- If a safeguarding concern is reported relating to a staff member or volunteer of Kids Club Kampala this will be passed on the relevant authorities to be investigated.
- In the absence of the Safeguarding Officer(s), or if the Safeguarding Officer(s) is in any way involved in the concern or suspicion, then the volunteer or Staff Member must report their concerns to the Trustees, who will decide on an appropriate course of further action. The Trustees will report the concern to the appropriate authorities where abuse is suspected or discovered.

## **Confidentiality**



Kids Club Kampala will ensure that any records made in relation to a referral will be kept confidentially and in a secure place. Information in relation to vulnerable adult concerns will be shared on a "need to know" basis. However, the sharing of information is vital to safeguarding and, therefore, the issue of confidentiality is secondary to the need for protection.

## **Recruitment for Safeguarding**

### **Safer Recruitment**

Kids Club Kampala has a responsibility for ensuring safe recruitment procedures of all staff and volunteers working with the organisation. Staff and volunteers working with us will all be subject to the following recruitment and induction processes and checks:

- Staff and volunteers are required to provide a minimum of two references upon application. These references are checked prior to the staff or volunteer commencing work.
- Staff and volunteers identities are checked and verified using more than one form of official identification.
- Staff and volunteers are all required to interview. At interview questions covering safeguarding are included in the interview format and must be adequately answered in order for the staff or volunteer to be successful in their application to work with Kids Club Kampala.
- Staff and volunteers all undergo induction training prior to beginning any active service for Kids Club Kampala. Induction training includes training on Kids Club Kampala's Safeguarding Policy along with other Kids Club Kampala policies.
- All staff and volunteers are required to read, understand, sign and agree to Kids Club Kampala's Safeguarding policy along with Kids Club Kampala's other related policies prior to beginning active service for Kids Club Kampala.
- When and if there are any changes or additions to Kids Club Kampala's policies staff and volunteers will be required to read, understand and sign the new policies.
- Any staff or volunteer that will be working directly with children and/or vulnerable adults is required to undergo a criminal records (DBS) check prior to commencing any work with children and/or vulnerable adults.
- Where it is not possible for an employee or volunteer to provide a DBS check, or where it is not possible for us to carry out a DBS or background check prior to an employee or volunteer working with us, they will be asked to complete a Safeguarding Self-Declaration Form



- Any staff or volunteer working with Kids Club Kampala will receive on-going safeguarding training outlining Kids Club Kampala's Safeguarding Policy and Procedure.
- All staff and volunteers are made aware of the Safeguarding Officers at management and board levels.

## **Child Protection**

### **Possible abusers**

- Adults (both male and female) and other children may abuse children. Abusers usually know the child (e.g. parent, babysitter, sibling, relative, friend of the family). Sometimes they represent someone in authority such as teachers, youth workers, children's workers or church workers / leaders.
- It is crucial that all volunteers and staff recognise that:
  - Abuse of children can and does happen; and
  - Such abuse is normally instigated by people known to, and trusted by, the child or children.
- A stranger will rarely abuse a child but sometimes paedophiles and others set out to join organisations to obtain access to children. People who want to harm children can access them through leisure, sport and voluntary work.
- Abuse may take place in the home, or within a family, community, organisational, religious or institutional setting. Children are particularly at risk in residential homes and in emergency situations – especially where children are displaced, refugees or separated from families, or where families are under extreme stress.
- Anyone could be an abuser, you should hold all staff, volunteers to the same high standards. No one should be treated differently with regards to safeguarding and due diligence undertaken.

### **Definitions of abuse (children):**

#### Physical Abuse

Physical abuse is the actual or likely injury to a child, or failure to prevent physical injury (or suffering) to a child. It includes hitting, beating with a stick or other implement, shaking, throwing, poisoning, burning, drowning or suffocating. This could result in bruises, burns, bite marks, cuts, head injury, whiplash, internal injuries and broken bones. It may also include the situation where a carer deliberately causes ill health to a child they are looking after or feigns ill-health in a child they are looking





after. This may involve forcing the child to work in an unsafe way/environment, or depriving the child of the necessities of food, water, sunlight or air.

### Sexual Abuse

Sexual abuse is the actual or likely sexual exploitation of a child or adolescent. It involves encouraging, forcing or enticing a child to take part in or observe sexual activities that they may or may not truly comprehend. It includes any action with sexual intent towards children such as touching a child's genitals, asking a child to touch the genitals of others, encouraging the child to watch or take part in pornography, or having sex with the child whether or not they appear to be consenting. It involves the child not being able to give informed consent and may violate social taboos or family roles. It includes rape, incest and all forms of sexual activity involving children, such as pornography and prostitution. It is criminal to involve children in sexual behaviours for which they are not personally, socially, and developmentally ready.

This includes Child Sexual Exploitation (CSE). This is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them.

### Neglect

Neglect is the persistent or severe failure to meet a child's basic physical and psychological needs or failure to protect a child from danger. It is any action that deliberately neglects the right to live, the right to learn, the right to participate and the right to speak. Neglect is likely to result in serious impairment to the child's health and development. It may involve a carer failing to protect a child from exposure to cold or starvation or extreme failure to carry out important aspects of care.

### Emotional Abuse

Emotional abuse is the actual or likely persistent or severe emotional ill treatment or rejection of a child, which is likely to have an adverse effect on the child's emotional and behavioural development. It includes any actions (gestures, word and behaviours) that deliberately cause children to feel afraid, anxious, in danger, corrupted, exploited, annoyed or discouraged. It may involve conveying to a child that they are worthless, unloved and inadequate. It involves neglecting to give enough love and attention, not making the child feel secure and worthy, or verbally assaulting the child by belittling, blaming, sarcasm, screaming and threats.

This includes spiritual abuse, which is abuse administered under the guise of religion, including harassment or humiliation, which may result in psychological trauma.



### Organised Abuse

Organised abuse is sexual abuse where there is more than a single abuser and the adults concerned appear to act together to abuse the child or children, and / or where an adult uses an institutional framework or position of authority to recruit children for sexual abuse.

This includes organized child trafficking. This is the action or practice of illegally procuring and relocating children, typically for the purposes of forced labour or sexual exploitation.

### Child Abuse linked to faith or belief

Abuse linked to faith or belief is where concerns for a child's welfare have been identified, and could be caused by, a belief in witchcraft, spirit or demonic possession, ritual or satanic abuse features; or when practices linked to faith or belief are harmful to a child.

Child abuse linked to faith or belief is not confined to one faith, nationality or ethnic community. Examples have been recorded worldwide across various religions including Christians, Muslims and Hindus.

Such abuse can include:

- abuse as a result of a child being accused of being a 'witch'
- abuse as a result of a child being accused of being possessed by 'evil spirits'
- ritualistic abuse which is prolonged sexual, physical and psychological abuse
- satanic abuse which is carried out in the name of 'satan' and may have links to cults
- any other harmful practice linked to a belief or faith

The forms of abuse that can occur fall into the four main categories of abuse namely, physical abuse, emotional abuse, neglect and/or sexual abuse.

We are committed to the protection of all people from all types of harm and exposure to exploitation including abuse linked to faith or belief. Our staff are trained to recognise and report on any concerns pertaining to any form of abuse or exploitation.

### Bullying

Bullying is increasingly recognised as harmful to children and adolescents. It could involve physical intimidation, verbal intimidation or emotional intimidation. It may include racist and sexist remarks or isolating or excluding someone. It always involves



a less powerful person experiencing deliberate hostility.

## **Recognising Signs of Child Abuse**

All Kids Club Kampala staff and volunteers must be alert to the possibilities of child abuse and are recommended to follow these pointers if they are uncertain:

### Signs of Physical Abuse

- Any injuries not consistent with the explanation given for them
- Injuries that occur to the body in places that are not normally exposed to falls, rough games, etc
- Injuries that have not received medical attention
- Reluctance to change for, or participate in, games or swimming
- Repeated urinary infections or unexplained tummy pains
- Bruises, bites, burns, fractures, cuts, scratches, etc which do not have an accidental explanation
- Substance abuse

### Signs of Neglect

- Under nourishment
- Failure to grow
- Constant hunger
- Stealing or gorging food
- Untreated illnesses
- Inadequate care

### Signs of Sexual Abuse

- Any allegations made by a child concerning sexual abuse
- Child with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour, or who regularly engage in age-inappropriate sexual play.
- Sexual activity through words, play or drawing
- Child who is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations
- Eating disorders

### Signs of Emotional Abuse

- Changes or regression in mood or behaviour, particularly where a child



withdraws or becomes clinging

- Depression / aggression
- Extreme anxiety
- Nervousness, frozen watchfulness
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and / or adults
- Attention-seeking behaviour
- Persistent tiredness
- Running away
- Stealing
- Lying

Indicators of child abuse linked to faith or belief

- physical injuries, such as bruises or burns (including historical injuries/scaring)
- a child reporting that they are or have been accused of being 'evil', and/or that they are having the 'devil beaten out of them'
- the child or family may use words such as 'kindoki', 'djin', 'juju' or 'voodoo' - all of which refer to spiritual beliefs
- a child becoming noticeably confused, withdrawn, disorientated or isolated and appearing alone amongst other children
- a child's personal care deteriorating (eg rapid loss of weight, being hungry, turning up to school without food or lunch money, being unkempt with dirty clothes)
- it may be evident that the child's parent or carer does not have a close bond with the child
- a child's attendance at school or college becomes irregular or there is a deterioration in a child's performance
- a child is taken out of a school altogether without another school place having been arranged
- Wearing unusual jewellery/items or in possession of ornaments/scripts.

### **Child Protection: Behaviour protocols**

Kids Club Kampala expects anyone interacting with the children on its behalf to abide by its behaviour and child discipline guidelines when interacting with children. These guidelines comply with the UN Convention on the Rights of the Child and are listed below.



**You should:**

- Play your part in helping to develop an ethos where all people matter and are treated equally, and with respect and dignity.
- Always put the care, welfare and safety needs of a child first.
- Respect a child's right to be involved in making choices and decisions which directly affect them.
- Listen attentively to any ideas and views a child wants to share with you.
- Respect a child's culture (for example their faith and religious beliefs).
- Respect a child's right to privacy and personal space.
- Respond sensitively to children who seem anxious about participating in certain activities.
- Speak to the Safeguarding Officer(s) immediately if you suspect that a child is experiencing abuse, bullying or harassment.
- Be aware of the vulnerability of some groups of children to being isolated and hurt (for example, children with disabilities and learning difficulties; Minority Ethnic children).
- Ensure that when you are working with children you are at least within sight or hearing of other adults.
- Listen carefully to any child who 'tells you' (sometimes through drawings and behaviour as well as words) that they are being harmed and report what you have discovered immediately to the Safeguarding Officer(s).
- Report immediately any suspicion that a child could be at risk of harm or abuse.
- Never dismiss what a child tells you as 'lies' or exaggeration.
- Only restrain a child who is at imminent risk of inflicting harm to themselves or others or is at risk of damaging property.
- Never underestimate the contribution that you can make to the development of safe communities for children.

**You should not:**

- Exaggerate or trivialise another worker's concerns about a child or ignore an allegation or suspicion of abuse in the hope that it will either 'go away' or that 'someone else will deal with it'.
- Discuss personal issues about a child or their family with other people except with the Safeguarding Officer(s) when you are concerned about the child's well being.
- Be drawn into any derogatory remarks or gestures in front of children or young persons.
- Allow a child, young person or adult to be bullied or harmed by anyone in the organisation.
- Allow children to swear or use sexualised language unchallenged.



**You must never:**

- Engage in sexually provocative games, including horseplay.
- Never allow others to or yourself engage in touching a child in a sexually provocative manner.
- Never make sexually suggestive comments to a child, even in fun.
- Engage in rough or physical contact unless it is permitted within the rules of a game or sports activity or conforms to the guidance on appropriate physical restraint.
- Never form inappropriate emotional or physical relationships with children.
- Harass or intimidate a child or worker because of their age, 'race', gender, sexual orientation, religious belief, socio-economic class or disability.
- Never invite or allow children to stay with you at your home without the knowledge and consent of the child's carers and Kids Club Kampala

**If abuse is disclosed or discovered:**

- Do not delay.
- Do not act alone.
- Do not start to investigate.
- Consult with our Safeguarding Officer(s), who will refer the matter on to the relevant authorities, if necessary.
- It is not your responsibility to inform anyone else, including the family, because you do not know who might be implicated.

**What to do if a child tells about abuse:**

- Look at the child directly.
- Accept what the child says.
- Keep calm.
- Tell the child that you will need to tell someone else - do not promise confidentiality.
- Be aware that the child may have been threatened.
- Tell the child they are not to blame.
- Do not press for information or ask leading questions but do ask them to tell, describe and explain (TED).
- Reassure the child they are right to tell and that you take what they say very seriously.
- Let them know what you are going to do next, whom you are going to tell and why and roughly what will happen.
- Finish on a positive note.



- As soon as possible afterwards, make hand-written notes of the nature of the concern or allegation, exactly what the child said, what you said in response, a description of any visible injuries. Sign and date the paper and note the time.
- Report the concern to the organisation's Safeguarding Officer(s) in accordance with the safeguarding procedure outlined in this Safeguarding Policy.

## **Protection of Vulnerable Adults**

### **Definitions of abuse (vulnerable adults)**

Abuse is a violation of an individual's human and civil rights by any other person or persons. Many incidents of abuse are criminal acts.

The abuse of vulnerable adults is defined as: 'The physical, psychological, emotional, financial or sexual maltreatment or neglect of a vulnerable adult by another person'. It may be a single act or repeated over a period of time, and may take one form or multiple forms. The lack of appropriate action can also be a form of abuse.

It can occur in a relationship where there is an expectation of trust and can be perpetrated by a person or persons, in breach of that trust, who have influence over the life of a dependant, whether they be formal or informal carers, staff, family members or others. It can also occur outside such a relationship.

Abuse can be either deliberate or the result of ignorance, or caused by a lack of training, knowledge or understanding. Often if a person is being abused in one way, they are also being abused in other ways. Abuse can take many forms including the following:

- **Physical Abuse:** Physical abuse is the actual or likely injury, or failure to prevent physical injury (or suffering) to a vulnerable adult. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a vulnerable adult. Physical harm may also be caused when a carer fabricates the symptoms of, or deliberately induces illness in a vulnerable adult.
- **Sexual Abuse:** Sexual abuse involves forcing or enticing a vulnerable adult to take part in sexual activities, whether or not the vulnerable adult is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving vulnerable adults in looking at,



or in the production of, sexual online images, watching sexual activities, or encouraging vulnerable adults to behave in sexually inappropriate ways. This includes sexual exploitation.

- **Emotional Abuse:** It may involve conveying vulnerable adults that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying, causing vulnerable adults frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of Emotional Abuse is involved in all types of ill treatment of a vulnerable adult though it may occur alone. This includes spiritual or religious abuse.
- **Neglect:** Neglect is the failure to meet a vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of the vulnerable adult's health or development. It is any action that deliberately neglects the right to live, the right to learn, the right to participate and the right to speak. It may also include neglect of, or unresponsiveness to, a vulnerable adult basic emotional needs.
- **Organised Abuse:** Organised abuse is sexual abuse where there is more than a single abuser and the adults concerned appear to act together to abuse the vulnerable adult or adults, and / or where an adult uses an institutional framework or position of authority to recruit vulnerable adults for sexual abuse. This includes trafficking.
- **Bullying:** Bullying is increasingly recognised as harmful to vulnerable adults. It could involve physical intimidation, verbal intimidation or emotional intimidation. It may include racist and sexist remarks or isolating or excluding someone. It always involves a less powerful person experiencing deliberate hostility.

An abuser can be anyone who has contact with the vulnerable person - it could be a partner, spouse, child, relative, friend, informal carer, a healthcare, social care or other worker, a peer or, less commonly, a stranger.

### **What to do if Vulnerable Adults talk to you about abuse**

It is recognised that a vulnerable adult may seek you out to share information about abuse or neglect, or talk spontaneously individually or in groups when you are present. In these situations, YOU MUST:





- Listen carefully to the vulnerable adult. Do not press for information or ask leading questions but do ask them to tell, describe and explain (TED).
- Give the vulnerable adult time and attention.
- Allow the vulnerable adult to give a spontaneous account; do not stop a vulnerable adult who is freely recalling significant events.
- Make an accurate record of the information you have been given taking care to record the timing, setting and people present, the vulnerable adult's presentation as well as what was said. Do not throw this away as it may later be needed as evidence.
- Use the vulnerable adult's own words where possible.
- Explain that you cannot promise not to speak to others about the information they have shared - do not offer false confidentiality.
- Reassure the vulnerable adult that: they have done the right thing in telling you; they have not done anything wrong.
- Tell the vulnerable adult what you are going to do next and explain that you will need to get help to keep him/her safe.
- Never promise confidentially. You should never promise to keep something secret as you may not be able to.
- DO NOT ask the vulnerable adult to repeat his or her account of events to anyone.
- Report the concern to the Safeguarding Officer(s) in accordance with the safeguarding procedure outlined in this Safeguarding Policy.
- Because of your observations of, or information received you may become concerned about a vulnerable adult who has not spoken to you. It is good practice to ask a vulnerable adult why they are upset or how a cut or bruise was caused, or respond to a vulnerable adult wanting to talk to you. This practice can help clarify vague concerns and result in appropriate action.

## **Allegations against who work with children and/or vulnerable adults**

If you have information which suggests an adult who works with children and vulnerable adults (in a paid or unpaid capacity) has:

- behaved in a way that has harmed or may have harmed a child or vulnerable adult.
- possibly committed a criminal offence against, or related to, a child or vulnerable adult.
- behaved towards a child/children and/or vulnerable adult/s in a way that indicated s/he is unsuitable to work with children and/or vulnerable adults.



You should speak immediately with the Safeguarding Officer(s). This person will consult with/make a referral to the relevant local authorities and/or police if necessary.

## **Safeguarding and Data Protection**

This relates to the storage of data, information and visual image at Kids Club Kampala. For more information about this, please also refer to Kids Club Kampala's Data Protection Policy.

### **Child Protection: Data Protection**

All staff and volunteers are obliged to report to the Safeguarding Officer(s) any concerns or suspicions they have about data, information or visual images being stored that is, or could be construed to be, abusive to a child or children.

It is a criminal offence to store data, information or visual images that are abusive to a child or children, either in its production or its content. This includes sexually abusive images of children and child pornography.

If a member of staff or a volunteer is found to have stored, or be storing, data, information or visual images that are abusive to a child or children, the Safeguarding Officer(s) will report the incident to the relevant statutory authorities and the police.

### **Safeguarding Data and Information**

Kids Club Kampala seeks to uphold the principles of Data Protection in relation to Safeguarding. The principles set out in this section apply to all written material stored by Kids Club Kampala. It includes names, addresses, contact details, photographs, slides and videos, and it is recognised that this list is not comprehensive.

No non-staff/volunteer member or organisation will be able to access the database(s), save in exceptional circumstances and in consultation with the Safeguarding Officer(s) and trustees. In such circumstances, the non-staff/volunteer member or organisation must undertake a full induction to the Data Protection Policy and the Safeguarding Policy and sign a contract confirming their agreement to adhere to them.

No volunteer or staff members should leave database open and unattended on any computer they are using. Neither should any printed information or information downloaded in soft copy from the database be left open or unattended.

No volunteer or staff member is allowed to download or store data or information that could be construed as abusive to a child or children, either in its production or its



content. This includes abusive images of children.

### **Data Protection Principles which relate to Child Protection**

It is a criminal offence to store data, information or visual images that are abusive to a child or children, either in its production or its content. This includes sexually abusive images of children.

If a member of staff or a volunteer is found to have stored, or be storing, data, information or visual images that are abusive to a child or children, the Safeguarding Officer(s) will report the incident to the relevant statutory authorities.

Staff members and volunteers are obliged to report to the Safeguarding Officer(s) any concerns or suspicions they have about data, information or visual images being stored that is, or could be construed to be, abusive to a child or children.

Any report of a concern or suspicion will be taken seriously. It is not the responsibility of the staff member or volunteer to decide whether or not the data, information or visual images is, or could be construed to be, abusive to a child or children. It is their responsibility to recognise their duty to report and to pass on any concerns or suspicions.

### **Reporting the Storage of Abusive Data, Information or Visual Images**

All staff and volunteers are obliged to report to the Safeguarding Officer(s) any concerns or suspicions they have about data, information or visual images being stored that is, or could be construed to be, abusive to a child or children.

In making this requirement a part of both the Data Protection and the Safeguarding Policy, it is recognised that certain data and information about 'children at risk' could be misconstrued as abusive if certain searches are made. If there is any doubt about the validity of a concern or suspicion, the final decision will lie with the Safeguarding Officer(s) and the Trustees.

Upon receiving notification of a staff or volunteer's concern or suspicion, the Safeguarding Officer(s) will

- a) Make a record of all details of the concern or suspicion;
- b) Ask a Trustee to carry out a search of the relevant computer(s)/files on which the data, information or visual images is allegedly stored;

It is a criminal offence to store data, information or visual images that are abusive to a child or children. If a staff member is found to have stored, or be storing, data,



information or visual images that are abusive to a child or children, the Safeguarding Officer(s) will report the incident to the relevant statutory authorities

In the absence of the Safeguarding Officer(s), or if the Safeguarding Officer(s) is in any way involved in the concern or suspicion, then the volunteer or staff member must report their concerns to the Trustees, who will decide on an appropriate course of further action. The Trustees will report the concern to the appropriate authorities where abuse is suspected or discovered.

Any report of a concern or suspicion will be taken seriously. It is not the responsibility of the staff member to decide whether or not the data, information or visual images is, or could be construed to be, abusive to a child or children. It is their responsibility to recognise their duty to report and to pass on any concerns or suspicions.

### **Dissemination of Data**

No data, image or information is to be disseminated if it is either abusive, or could be construed as abusive, of a child or children, or which could potentially be used to abuse a child or children.

Common sense must prevail in the use of this good practice. Before disseminating any data, image or information, each worker must ask his or herself two questions:

- (a) 'Will this information lead people to specific details of a child such that personal access with that child is made easier? (For example, name and location of a child)
- (b) Is this information restricted to people with special access to confidential or strategic processes aimed at protecting children? (For example, a strategic plan to eradicate sexual trafficking).

If the answer is yes, the request will be denied and a simple explanation given to the enquirer. If the answer is a maybe, then please check with the Safeguarding Officer(s) before responding. If the volunteer or staff member handling any request for information, data or a visual image, has any reason to doubt the integrity of the Third Party and/or their request for resources, such resources will not be released. The Safeguarding Officer(s) must be notified and a record kept. Details of the Safeguarding Officers can be found in the Safeguarding Policy

### **Safeguarding and Social Media**

For more information regarding Safeguarding in relation to Social Media and Data and Image Sharing, including sharing stories and images of children, please refer to and read this policy in conjunction with Kids Club Kampala's Social Media Policy.