



## **KEEN London Safeguarding Children and Vulnerable Adults Policy**

KEEN London is a registered charity that runs free weekly games and activity sessions for children with additional needs. Each week children are paired one to one with volunteer coaches for individual support.

KEEN London believes in the right of every child and vulnerable adult to be valued and treated with dignity and respect. It is always unacceptable for a child or vulnerable adult to experience abuse of any kind and the charity recognises its responsibilities to safeguard the welfare of all children and vulnerable adults, by its commitment to practices which protect them.

### **We recognise that:**

- The welfare of the child/vulnerable adult is paramount.
- All children and vulnerable adults regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.
- Children and adults with disabilities or additional needs may be at greater risk of abuse due to their difficulties in communication and their care needs.
- Working in partnership with children, vulnerable adults, their parents, carers and their agencies is essential in promoting young people's welfare.

### **Purpose of this Policy:**

- An effective whole organisation safeguarding policy is one that provides clear direction to staff and others about expected behaviour when dealing with safeguarding issues. An effective policy also makes explicit KEEN London's commitment to the development of good practice and sound procedures. This ensures that safeguarding concerns, referrals and monitoring may be handled sensitively, professionally and in ways that support the needs of the learner.
- To provide protection for the children and vulnerable adults who receive KEEN London services, including the children of adult members or users
- To provide employees and volunteers with guidance on procedures they should adopt in the event that they suspect a child or young person may be experiencing, or be at risk of, harm
- Parents, carers or other interested parties can obtain a copy of this safeguarding policy on request.

This policy applies to everyone at KEEN London, including the board of trustees, paid employees, volunteers who attend our sessions, other volunteers, agency employees, students or anyone working on behalf of KEEN London.

### **We will seek to safeguard children and vulnerable adults by:**

- Valuing them, listening to and respecting them.
- Adopting child and vulnerable adult protection guidelines through procedures and a code of conduct for employees and volunteers.
- Recruiting employees and volunteers safely, ensuring all necessary checks are made.
- Sharing information about child and vulnerable adult protection and good practice with children, vulnerable adults, parents, employees and volunteers
- Sharing information about concerns with agencies who need to know, and involving parents, carers, children and vulnerable adults appropriately.
- Providing effective management for employees and volunteers through supervision, support and training.
- Ensuring that we provide a safe physical environment for our children, vulnerable adults, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.



### Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England. A summary of the key legislation and guidance is available from [nspcc.org.uk/childprotection](https://www.nspcc.org.uk/childprotection).

### This policy should be read alongside our policies and procedures on:

- Dealing with Disclosures and Concerns about a Child or Vulnerable Adult
- Definitions of Abuse (Appendix 1)
- Safeguarding Record for an Incident or Concern (Appendix 2)
- Managing allegations against staff and volunteers
- Recruitment and training
- Health and safety
- Photography and Sharing Images

The above documents can be obtained from the **Designated Safeguarding Lead** or by contacting [info@keenlondon.org](mailto:info@keenlondon.org).

### ROLES AND RESPONSIBILITIES

- All adults working with or on behalf of children have a responsibility to protect them. There are, however, key people within KEEN London and the local authority who have specific responsibilities under safeguarding procedures.
- It is the role of the **Designated Safeguarding Lead (DSL)** to ensure that all of the safeguarding procedures are followed within KEEN London, and to make appropriate, timely referrals to local authority social services in accordance with these procedures. If for any reason the DSL is unavailable, local Child Protection Officers will act in their absence, with the support of a designated trustee as required.
- Additionally, it is the role of the DSL to ensure all staff members (including temporary staff and volunteers) are aware of KEEN London's procedures, and to advise staff and to offer support to those requiring this.

### People Responsible for Safeguarding

All contact details can be found here: [www.keenlondon.org/protect](http://www.keenlondon.org/protect)

#### Child Protection Officers

North London Service Coordinator  
East London Service Coordinator  
South London Service Coordinator

Samira Eddaou ([samira@keenlondon.org](mailto:samira@keenlondon.org)), 07719 565986  
Viktoria Venkatess ([Viktoria@keenlondon.org](mailto:Viktoria@keenlondon.org)), 07789 881997  
Samantha Still ([samantha@keenlondon.org](mailto:samantha@keenlondon.org)), 07703 468133

#### Designated Safeguarding Lead

Director

Debbie Holden ([debbie@keenlondon.org](mailto:debbie@keenlondon.org)), 07706 347084

#### Chair of Trustees

We are committed to reviewing our policy and good practice annually.

**This policy was last reviewed: July 2023**



## Safeguarding: Dealing with Disclosures and Concerns about a Child or Vulnerable Adult

### Appendix 1: Definitions of Abuse

*This document should be read in conjunction with the 'KEEN London Child Protection Policy and Procedures' which can be found at [www.keenlondon.org/protect](http://www.keenlondon.org/protect).*

Underneath each definition are lists of some of signs and behaviours which may indicate that a child or vulnerable adult is being abused. Such lists are **not** fail-safe mechanisms, but can be helpful indicators in certain combinations. In themselves they are not evidence of abuse, but they may suggest abuse if a child or vulnerable adult exhibits several of them or a pattern emerges.

Remember that there can be other explanations for a child or vulnerable adult showing such signs or behaving in such ways. This is especially pertinent for children and adults with additional needs.

#### **HARM**

Is the ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another; Development means physical, intellectual, emotional, social or behavioural development; Health includes physical and mental health; Ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.

#### **WHAT IS ABUSE AND NEGLECT?**

Abuse and neglect are forms of maltreatment of a child or vulnerable adult. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. Children and vulnerable adults may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or vulnerable person.

Underneath each definition are lists of some signs and behaviours which may indicate that a child or vulnerable adult is being abused. Such lists are **not** fail-safe mechanisms, but can be helpful indicators in certain combinations. In themselves they are not evidence of abuse, but they may suggest abuse if a child or vulnerable adult exhibits several of them or a pattern emerges.

Remember that there can be other explanations for a child or vulnerable adult showing such signs or behaving in such ways. This is especially pertinent for children and adults with additional needs.

#### **Recognising Abuse**

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example, by hitting them or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.

Four categories of abuse:

#### **Physical Abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness.

#### **Possible signs of physical abuse:**

- Unexplained injuries or burns, particularly if they are recurrent
- Improbable explanations for injuries
- Untreated injuries or illness not attended to
- Fear of going home or of a parent/carer being contacted



- Significant changes in behaviour with no explanation
- Signs of physical discomfort without explanation

### **Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed. These may include interactions that are beyond the developmental capability of the child or vulnerable adult, as well as overprotection and limitation of exploration and learning, or preventing them participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children and vulnerable adults frequently to feel frightened or in danger, or the exploitation or corruption of children and vulnerable adults. Some level of emotional abuse is involved in all types of maltreatment of a child or vulnerable adult, though it may occur alone.

#### **Possible signs of emotional abuse:**

- Continual self-deprecation, low self-esteem
- Inappropriate emotional responses to new difficult or painful situations
- Drug, alcohol or solvent abuse
- Depression, withdrawal

### **Sexual Abuse**

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, including prostitution, whether or not they are aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children and vulnerable adults in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging children or vulnerable adults to behave in sexually inappropriate ways.

#### **Possible signs of sexual abuse:**

- Bruises, bites or marks on the body
- Scratches, abrasions or persistent infections in anal or genital areas
- Pregnancy – especially in young adolescents or vulnerable adults who are evasive about the identity of the father
- Age-inappropriate sexual awareness (may be evident in play, drawings, vocabulary, writing)
- Attempts to teach others about sexual activity
- Pain when sitting down
- Odour

### **Neglect**

Is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers); or



- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **CHILD CRIMINAL EXPLOITATION: COUNTY LINES/ SERIOUS YOUTH VIOLENCE**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, markets and seaside towns.

Key to identifying potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs, and a referral to the National Referral Mechanism should be considered.

#### **Like other forms of abuse and exploitation, county lines exploitation:**

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors, including gender, cognitive ability, physical strength, status, and access to economic or other resources.

#### **Who is vulnerable to county lines exploitation/ serious youth violence?**

The national picture on county lines continues to develop but there are recorded cases of:

- Children as young as 12 years old are being exploited by gangs to courier drugs out of their local area; 15-16 years is the most common age range.
- Both males and females are being exploited.
- White British children are being targeted because gangs perceive they are more likely to evade police detection.
- The use of social media to make initial contact with children and young people.
- Class A drug users are being targeted so that gangs can take over their homes (known as 'cuckooing').

KEEN London understands that county lines exploitation is widespread, with gangs from big cities including London, Manchester and Liverpool operating throughout England, Wales and Scotland. Gangs are known to target vulnerable children and adults; some of the factors that heighten a person's vulnerability include:

- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Social isolation or social difficulties;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other people involved in gangs;
- Having a physical or learning disability;
- Having mental health or substance misuse issues;
- Being in care (particularly those in residential care and those with interrupted care histories).



### **CHILDREN WHO MAY BE PARTICULARLY VULNERABLE TO ABUSE**

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures that fail to acknowledge children's diverse circumstances rather than the individual child's personality, impairment or circumstances.

Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and a reluctance on the part of some adults to accept that abuse can occur.

To ensure that all receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs
- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- learners who are looked after by the local authority or care-leavers • asylum seekers
- living away from home
- vulnerable to being bullied or engaging in bullying
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

### **Safeguarding learners with Special Educational Needs**

KEEN London recognises that learners with special educational needs may be more susceptible to abuse and staff members are aware that behaviour, mood and injury may relate to possible abuse and not just their SEN or disability.

All staff will take into account that changes in behaviour and/ or demeanour may not necessarily be linked to their disability but to consider the potential for abuse as a reason for these changes. KEEN London understands that there is a higher risk of peer group isolation, bullying and difficulties with communication for learners who have educational needs.

### **SPIRITUAL, CULTURAL AND RELIGIOUS BELIEFS: WITCHCRAFT AND SPIRIT POSSESSION**

Where parents, families and the child themselves believe that an evil force has entered a child and is controlling them, the belief includes the child being able to use the evil force to harm others. This evil is variously known as black magic, kindoki, ndoki, the evil eye, djinn, voodoo, obeah. Children are called witches or sorcerers. Parents/Carers can be initiated into and/or supported in the belief that their child is possessed by an evil spirit by a privately contacted spiritualist/indigenous healer or by a local community faith leader. The task of exorcism or deliverance is often undertaken by a faith leader, or by the parents or other family members.



A child or vulnerable adult may suffer emotional abuse if they are labelled and treated as being possessed with an evil spirit. In addition, significant harm may occur when an attempt is made to 'exorcise' or 'deliver' the evil spirit from the child.

**Possible signs of abuse linked to spirit possession:**

- Signs or marks, such as bruises or burns, from physical abuse
- Becoming noticeably confused, withdrawn, disorientated or isolated and appearing alone amongst others
- Personal care deteriorating, for example through a loss of weight, being hungry, being unkempt with dirty clothes and even faeces smeared on to them;
- It may also be directly evident that the child/vulnerable adults parent does not show concern for or a close bond with them
- Attendance becoming irregular, or being taken out of sessions altogether
- Reporting that they are or have been accused of being evil, and/or that they are having the devil beaten out of them.

**FEMALE GENITAL MUTILATION (FGM)**

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non medical reasons. It's also known as female circumcision or cutting. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence. There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.

The term FGM covers all harmful procedures to the female genitalia for non-medical purposes. There are 4 types - all are illegal and have serious health risks. FGM ranges from pricking or cauterizing the genital area, through partial or total removal of the clitoris, cutting the lips (the labia) and narrowing the vaginal opening.

FGM has been a criminal offence in the UK since 1985. In 2003 it also became a criminal offence for UK nationals or permanent UK residents to take their child abroad to have female genital mutilation.

**Possible signs of FGM:**

A girl or woman at immediate risk of FGM may not know what's going to happen. But she might talk about or you may become aware of:

- a long holiday abroad or going 'home' to visit family
- relative or cutter visiting from abroad
- a special occasion or ceremony to 'become a woman' or get ready for marriage
- a female relative being cut – a sister, cousin, or an older female relative such as a mother or aunt.

**PEER ON PEER ABUSE**

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms.

This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;



- Sexual violence and sexual harassment;
- Sexting (also known as youth produced sexual imagery); and
- Initiation/hazing type violence and rituals.

## **DOMESTIC ABUSE**

Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. But it isn't just physical violence – domestic abuse includes any emotional, physical, sexual, financial or psychological abuse. It can happen in any relationship, and even after the relationship has ended. Both men and women can be abused or abusers.

Witnessing domestic abuse is really distressing and scary for a child and causes serious harm. Children living in a home where domestic abuse is happening are at risk of other types of abuse too. Children can experience domestic abuse or violence in lots of different ways. They might:

- see the abuse
- hear it from another room
- see a parent's injuries or distress afterwards
- be hurt by being nearby or trying to stop the abuse.

Domestic abuse can happen in any relationship, and it affects young people too. They may not realise that what's happening is abuse. Even if they do, they might not tell anyone about it because they're scared of what will happen or ashamed about what people will think.

## **CHILD SEXUAL EXPLOITATION**

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example, food, accommodation, drugs, alcohol, gifts, money or, in some cases, simply affection) as a result of engaging in sexual activities.

Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying, including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by other people, but everyone must act on their concerns, as they would for any other type of abuse.

## **PREVENT and anti-radicalization**

At KEEN London, we are fully aware and committed to the ongoing protection and safety of our athletes, staff, volunteers and the wider community in accordance with DfE guidance 'Working together to Safeguard Children' (2018) and 'Keeping Children Safe in Education' (2019). An integral part of that work relates to the government's PREVENT strategy and the duties it places on organisations.





Our organisation is committed to providing a secure environment for athletes, where children feel safe and are kept safe. All adults in our organisation recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for children or not.

**Staff will be alert to issues including:**

- Disclosures by pupils of their exposure to the extremist actions, views or materials of others outside of the Centre, such as in their homes or community groups
- Graffiti symbols, writing or art work promoting extremist messages or images
- Pupils accessing extremist material online, including through social networking sites
- Parental reports of changes in behaviour, friendship or actions and requests for assistance
- Use of extremist or 'hate' terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture



**Safeguarding: Dealing with Disclosures and Concerns about a Child or Vulnerable Adult**

**Appendix 2: Safeguarding Record for an Incident or Concern**

**About the person making the report**

Name	
Position in KEEN London	
Date	
Location	

**About the person whose concerns are being reported**

*Leave blank if you are reporting your own concerns*

Name	
Position in KEEN London	
Phone	
Email	

**About the Child/Young Person**

Name	
Date of Birth	
Address	
Parent/Guardian	
Phone	
Email	

**About the incident or concern**

This form is for recording either a 'concern' (a worry about the welfare of a child) – or an 'incident' (where abuse has been directly observed, or reported by the child). If any details are not immediately known, complete the form as far as possible and submit it - do not delay in order to find more details.



For example, the kinds of ‘concerns’ that need to be recorded are:

- Changed behaviour or unusual behaviour; unexplained or recurring health problems
- Emotional well-being of the child — uncharacteristically withdrawn or nervous
- Any discussions with caregivers about concerns, including their response and information about home conditions

**Any incidence of abuse must be recorded.**

<b>Date of incident or concern</b>	
<b>Your observations and concerns</b>	
<b>Please record exactly what you said, and what the child said.</b> <i>Do not lead the child; report exactly what was said</i>	
<b>Details of any action taken so far</b>	

**Signature of person reporting**

<b>Date of report</b>	
<b>Signed</b>	

**Received by Senior Safeguarding Officer/Chair of Trustees**

<b>Date received</b>	
<b>Signed</b>	

**Safeguarding Record Continuation sheet:**

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