

KENYA GLOBAL BUSINESS ALLIANCE (KGBA) CIC

Company No. 17187555

SAFEGUARDING POLICY

Protecting Adults at Risk and Vulnerable Members of Our Community

Last Reviewed: August 2026

Next Review Due: August 2027

Designated Safeguarding Lead (DSL): Mary Njonjo

Deputy Designated Safeguarding Lead: Joshua Ntonjira

1. Policy Statement

Kenya Global Business Alliance (KGBA) CIC is a UK-registered Community Interest Company dedicated to empowering Kenyan entrepreneurs, professionals and investors across the United Kingdom. As an organisation that delivers programmes, events, mentoring and networking activities — including the Disability Entrepreneurship Programme and the Youth Enterprise and Innovation Programme for founders aged 18 and above — KGBA has a clear and unwavering duty of care to all members, participants and guests who engage with us.

KGBA is committed to creating safe, respectful and inclusive environments in which every adult can participate with confidence and dignity. We recognise that some of the individuals who engage with our organisation may be adults at risk — including people living with disabilities, individuals facing economic hardship, and those from marginalised or underrepresented communities. We take our responsibility to protect these individuals seriously and embed safeguarding across everything we do.

We believe that every adult who engages with KGBA has the right to be treated with respect, to be heard, and to be kept safe. We believe that safeguarding is the shared responsibility of every director, member of staff, volunteer, contractor and partner associated with KGBA. We are committed to acting swiftly and proportionately whenever a concern is raised, and to maintaining a zero-tolerance approach to abuse, exploitation and harm in any form.

This policy applies to all directors, staff, volunteers, contractors and partners working with or on behalf of KGBA CIC, across all environments and settings.

2. Purpose and Aims

Purpose

The purpose of this policy is to provide a clear and practical framework for safeguarding adults at risk and vulnerable members of the KGBA community. It ensures that all representatives of KGBA CIC act in the best interests of every participant, whether they are attending an event, taking part in a programme, receiving mentoring or engaging with KGBA in any other capacity.

Scope

This policy applies to all KGBA CIC programmes, events, networking activities, trade missions and services, whether delivered in person, online or in an offsite setting. It applies to all individuals representing the organisation in any capacity, whether paid or voluntary.

Aims

This policy aims to promote the safety, dignity and wellbeing of all adults who engage with KGBA, with particular attention to adults at risk and vulnerable members. It aims to ensure that safeguarding concerns are identified early and responded to swiftly. It seeks to foster a culture of accountability, trust and inclusion across the entire KGBA community, and to ensure KGBA fully meets its obligations as a Community Interest Company committed to genuine and measurable community benefit.

3. Safeguarding Leads and Governance

Designated Safeguarding Lead (DSL)

Name: Mary Njonjo

Role: Founder and Chief Executive Officer (CEO)

Organisation: Kenya Global Business Alliance (KGBA) CIC

Address: Level 1, Devonshire House, 1 Mayfair Place, Mayfair, London W1J 8AJ

Email: info@kgba.co.uk

Phone: +44 (0)20 3205 7165

Deputy Designated Safeguarding Lead

Name: Joshua Ntonjira

Role: Director, Kenya Global Business Alliance (KGBA) CIC

Address: Level 1, Devonshire House, 1 Mayfair Place, Mayfair, London W1J 8AJ

Email: info@kgba.co.uk

Phone: +44 (0)20 3205 7165

External Safeguarding Contacts (London)

In the event of an emergency, staff and volunteers must call 999 immediately. For non-emergency situations, the police can be contacted on 101. The NSPCC Helpline is available on 0808 800 5000. The Westminster Multi-Agency Safeguarding Hub (MASH) can be reached on 020 7641 4000. The Local

Authority Designated Officer (LADO) for the City of Westminster can be contacted on 020 7641 7668. Adult Social Care for Westminster can be reached on 020 7641 1444, and out-of-hours emergency social care is available on 020 7641 2388.

4. Legal and Policy Framework

This policy is grounded in and compliant with the following legislation and statutory guidance: the Care Act 2014, including the Making Safeguarding Personal framework; the Data Protection Act 2018 and UK GDPR; the Safeguarding Vulnerable Groups Act 2006; the Equality Act 2010; the Mental Capacity Act 2005; the Human Rights Act 1998; the Counter-Terrorism and Security Act 2015, including the Prevent Duty; the Modern Slavery Act 2015; the Charity Commission's Safeguarding Guidance for CICs and voluntary sector organisations; and the Companies House Community Interest Company Regulations 2005.

5. Definitions

An adult at risk is defined as any person aged 18 or over who has care and support needs, who is experiencing or is at risk of abuse or neglect, and who is unable to protect themselves adequately as a result of those needs. This may include, but is not limited to, people living with physical or mental disabilities, individuals experiencing financial hardship or exploitation, and people who are isolated or marginalised within their communities.

Safeguarding refers to the proactive and ongoing measures taken by KGBA to promote the welfare, dignity and safety of adults at risk, and to prevent harm before it occurs. A safeguarding concern is any situation in which a member of staff, volunteer or partner believes or suspects that an adult at risk is experiencing or at risk of experiencing abuse, neglect or exploitation. The Designated Safeguarding Lead — referred to throughout this document as the DSL — is the named individual, Mary Njonjo, who holds primary responsibility for safeguarding oversight within KGBA.

6. Equality, Diversity and Inclusion

KGBA gives equal priority to safeguarding every adult who engages with our organisation, without exception. Our commitment to safeguarding applies regardless of age, disability, race, ethnicity, national origin, religion or belief, sex, gender identity, sexual orientation, socio-economic background, immigration status or any other protected or personal characteristic.

KGBA recognises that some members of our community face additional or compounded risks of harm due to the intersection of multiple vulnerabilities. This is particularly relevant to disabled entrepreneurs engaging with our Disability Entrepreneurship Programme, to members from diaspora communities who may have experienced systemic disadvantage, and to individuals who may be economically vulnerable. We take deliberate and proactive steps to address these inequalities in the way we design and deliver

our programmes, events and support. Safeguarding at KGBA is inseparable from our commitment to inclusion.

7. Categories of Harm and Abuse

KGBA recognises all categories of harm and abuse as defined within the Care Act 2014 and associated statutory guidance. Physical abuse refers to the deliberate use of force against an individual, resulting in injury, pain or impairment. Psychological or emotional abuse refers to behaviour that causes mental suffering, including threats, humiliation, coercion and controlling behaviour. Financial or material abuse refers to the theft, fraud or misuse of an individual's money, property or resources — a particular risk in business and entrepreneurial settings.

Sexual abuse refers to any sexual act to which an individual has not consented or cannot consent. Neglect refers to the failure to meet an individual's basic needs or to access appropriate care and support. Discriminatory abuse refers to treatment that is based on prejudice relating to any protected characteristic. Organisational or institutional abuse refers to harm caused by the culture, practices or policies of an organisation, including KGBA itself. Modern slavery and trafficking refer to situations in which individuals are controlled, coerced or exploited for labour or other purposes. Radicalisation and extremism, including online radicalisation, are also recognised as safeguarding concerns to which KGBA staff and volunteers must remain alert.

Any concern that an individual may be experiencing any of the above forms of harm must be reported to the DSL without delay, regardless of whether the concern has been disclosed, observed or suspected.

8. Membership, Registration and Consent

All individuals who join KGBA as members, or who participate in any KGBA programme, event or activity, are registered with accurate and up-to-date contact details held securely on file. For participants in KGBA's structured programmes — including the Disability Entrepreneurship Programme and the Youth Enterprise and Innovation Programme — relevant background information and emergency contact details are collected at the point of registration.

KGBA communicates clearly to all members and participants how their data is used and stored, in full compliance with the Data Protection Act 2018 and UK GDPR. Consent is obtained prior to participation in any programme that involves the collection of sensitive information, the use of images or recordings, or any form of one-to-one support. All participants are made aware of KGBA's safeguarding policy and how to raise a concern at the point of joining.

9. Safer Recruitment

KGBA applies safer recruitment best practice to all appointments, particularly for roles that involve direct contact with adults at risk or the delivery of KGBA programmes. Every appointment process

includes a structured application and interview, a minimum of two professional references including one from the most recent employer or role, and thorough verification of identity, qualifications and employment history.

Enhanced Disclosure and Barring Service (DBS) checks are required for all staff and volunteers working in roles that involve regular contact with adults at risk, including those delivering the Disability Entrepreneurship Programme. These checks are refreshed at least every three years. Safeguarding responsibilities are clearly communicated to every individual before they commence their role with KGBA, and all new appointees serve a probationary period during which safeguarding practice is actively monitored and reviewed.

10. Conduct and Professional Boundaries

All KGBA directors, staff and volunteers are expected to maintain clear, appropriate and consistent professional boundaries in all interactions with members, participants and guests. One-to-one meetings between a staff member or volunteer and a member who is an adult at risk should be avoided wherever possible. Where a one-to-one interaction is necessary — for example, during a mentoring session — it must be agreed and documented in advance, and the DSL must be informed.

No private or personal communications are permitted with members or participants outside of official KGBA channels. This includes personal social media accounts, personal email addresses and private messaging applications. All communications relating to KGBA programmes and membership must take place through the organisation's verified contact channels only. Any behaviour that could reasonably be perceived as inappropriate, coercive or exploitative is treated as a serious safeguarding matter and addressed immediately. Professional boundaries apply equally across all in-person, telephone and digital interactions.

11. Safety and Risk Management

KGBA completes a risk assessment for every venue, programme activity and event before it takes place. All venues used by KGBA are assessed for accessibility, emergency exit provision and suitability for all participants, including those with physical disabilities. At least one KGBA representative with a current first aid qualification is present at every in-person event, and emergency procedures are communicated clearly to all staff and volunteers at the outset of every activity.

KGBA holds appropriate public liability insurance for all events and activities. Any transport arranged in connection with KGBA activities must be fully licensed, insured and compliant with all applicable safety requirements. Risk assessments are reviewed following any incident and updated ahead of any significant change to a programme or event.

12. Events, Trade Missions and Offsite Activities

KGBA organises a range of in-person events, networking evenings, workshops, trade missions and offsite activities throughout the year. A full risk assessment and appropriate insurance are required for all offsite activities before they take place. Adequate supervision is maintained throughout, and no participant who is an adult at risk is left without appropriate support at any point during a KGBA-organised activity.

For international activities — including the Kenya and United Kingdom Trade Mission — KGBA ensures that all participants are comprehensively briefed on logistics, safety arrangements and the process for raising a concern. The lead organiser carries emergency contact information for all participants throughout the activity. Any safeguarding concern that arises during an offsite or international activity is reported to the DSL as soon as it is safe and practicable to do so.

13. Responding to Concerns or Disclosures

If any person is in immediate danger, the first and only priority is to call 999 without delay. No other consideration takes precedence over immediate physical safety.

When a safeguarding concern is raised or a disclosure is made to a member of KGBA staff or a volunteer, they must remain calm and listen carefully to what the individual is telling them, without interrupting, leading or questioning in depth. They must acknowledge what has been shared and reassure the individual that they have done the right thing. They must not make any promises about confidentiality or about the outcome of any action taken.

The concern or disclosure must be recorded in writing as soon as possible after the conversation, using the individual's own words wherever possible. The written record must include the date and time, a clear account of what was said and observed, the names of all those present, and must be signed and dated by the person making the record. This record must be passed to the DSL — Mary Njonjo — or in her absence to the Deputy DSL — Joshua Ntonjira — on the same day, without exception.

Where a concern relates to the DSL herself, it must be taken directly to the Deputy DSL or to a Director. Where a concern relates to a member of KGBA staff or a volunteer, it must also be referred to the Local Authority Designated Officer (LADO). KGBA will cooperate fully with all statutory authorities throughout any investigation. No concern is ever left unrecorded or unreported, regardless of how minor it may initially appear.

14. Online Safety

KGBA delivers a significant and growing proportion of its programmes and events through online platforms. The same safeguarding standards that apply in person apply equally and without exception in all digital environments. Only secure and approved platforms are used for KGBA-hosted online sessions and communications, and all participants are provided with clear guidance on how to engage safely within those settings.

No unsupervised private communications are permitted between KGBA staff or volunteers and any member or participant through digital channels. Where online sessions are recorded, this is made clear

to all participants in advance and their consent is obtained. All staff and volunteers are briefed on digital safeguarding responsibilities as part of their induction. Any concern arising in an online environment — including inappropriate messaging, harassment or exploitative behaviour — is treated with the same urgency and seriousness as a concern arising in a physical setting and reported to the DSL immediately.

15. Information Sharing and Confidentiality

KGBA handles all safeguarding information with the utmost care and discretion. Information relating to a safeguarding concern is shared only with those individuals who have a direct and legitimate role in supporting the person concerned or in managing the response. This is determined on a strict need-to-know basis and is not shared more widely within the organisation or externally without proper justification.

Confidentiality is not absolute where the safety or wellbeing of an adult at risk is at stake. Where KGBA has reasonable grounds to believe that a person is experiencing or is at risk of serious harm, information will be shared with relevant statutory authorities regardless of any request for confidentiality. All staff and volunteers are made aware of this position clearly and explicitly at the time of their induction. KGBA complies fully with the Data Protection Act 2018 and UK GDPR in all aspects of safeguarding-related data handling and information sharing.

16. Record Keeping

KGBA maintains accurate, detailed and secure written records of all safeguarding concerns, disclosures and the actions taken in response to them. Every record must include the date and time of the concern or disclosure, a clear and precise written account using the individual's own words wherever possible, the names of all parties present, the actions taken by KGBA in response, and the signature of the staff member or volunteer making the record.

All safeguarding records are stored securely in a location accessible only to the DSL, the Deputy DSL and relevant Directors. They are not held within general membership or programme files. All safeguarding records are retained for a minimum of six years from the date of the most recent entry, or for a longer period where required by law or funder guidance. No safeguarding records may be destroyed without the explicit authorisation of the DSL and in full compliance with KGBA's data retention policy.

17. Whistleblowing

KGBA actively encourages all directors, staff, volunteers and partners to report any safeguarding concern, unsafe practice or inappropriate behaviour — whether observed, suspected or disclosed — without fear of retaliation or negative consequence. Raising a genuine safeguarding concern in good faith is not only supported by KGBA; it is expected of everyone who represents the organisation.

Concerns may be raised with the DSL — Mary Njonjo — with the Deputy DSL — Joshua Ntonjira — or with any Director. Where a concern relates to a Director or a senior member of staff, it may be raised independently and directly with the NSPCC Whistleblowing Helpline on 0808 800 5000, or with the Local Authority Designated Officer (LADO). Any act of retaliation against a person who raises a safeguarding concern in good faith will be treated as a serious disciplinary matter and addressed accordingly.

18. Training and Development

All KGBA directors, staff and volunteers receive safeguarding induction training before they begin any work with the organisation. This training covers the key principles of adult safeguarding, how to recognise signs of abuse or harm, and the correct procedure for reporting a concern. Annual safeguarding refresher training is mandatory for all representatives of KGBA, and training records are maintained and reviewed each year by the DSL and the Board.

The Designated Safeguarding Lead undertakes formal safeguarding training appropriate to her role at least every two years. The Deputy DSL receives training that equips him to support the DSL and to act in her absence. Staff delivering specialist programmes — including the Disability Entrepreneurship Programme — receive additional training relevant to the specific vulnerabilities and needs of those they are supporting. KGBA ensures that all representatives are kept informed of changes to legislation, emerging risks and current best practice on an ongoing basis.

19. Monitoring, Review and Accountability

This policy is reviewed annually, or sooner in the event of a significant safeguarding incident, a change in legislation or updated statutory guidance. The review is led by the DSL in consultation with the Board of Directors and takes into account any safeguarding incidents that have occurred during the preceding year, feedback from staff and volunteers, and any changes to KGBA's programmes or membership base that may affect safeguarding risk.

The effectiveness of this policy is assessed through the regular review of safeguarding records and incident reports, feedback from staff, volunteers and programme participants, Board oversight and accountability discussions, and external review where this is considered appropriate. The updated policy is communicated to all staff, volunteers and partners following each review, and is made publicly available on the KGBA website. The Board of Directors bears ultimate responsibility for ensuring that this policy is properly resourced, consistently applied and embedded across all KGBA operations.

Policy Adoption

This Safeguarding Policy was adopted by the Board of Directors of Kenya Global Business Alliance (KGBA) CIC on the date signed below and is effective immediately upon adoption. All directors, staff, volunteers and partners are required to read, understand and comply with this policy in full.

Signed on behalf of the Board of Directors:

Mary Njonjo

Founder and Chief Executive Officer (CEO) | Designated Safeguarding Lead (DSL)



A handwritten signature in black ink, appearing to read 'Mary Njonjo', is written over a horizontal dashed line.

Joshua Ntonjira

Director | Deputy Designated Safeguarding Lead

Date: ____20/08/2026

Date of Adoption: __20/08/2026_____

Next Review Date: _____

Kenya Global Business Alliance (KGBA) CIC | Company No. 17187555 | Level 1, Devonshire House, 1 Mayfair Place, Mayfair, London W1J 8AJ
| info@kgba.co.uk | kgba.co.uk