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SAFEGUARDING AND CHILD PROTECTION POLICY

1. Introduction

Kampala International School Uganda (KISU) is committed to safeguarding and promoting the welfare of every child in its care. We believe every child has the right to be safe, respected and heard and that safeguarding is everyone's responsibility. This policy sets out how the school prevents harm, recognises and responds to concerns, and works with families and Ugandan authorities to protect children. It applies to all staff, Advisory Board members, volunteers, contractors and visitors and complies with Ugandan law and recognised international good practice.

2. Purpose of the policy

This policy sets out how KISU keeps children safe from harm. The child's welfare and best interests come first in every decision.

It aims to:

- Prevent harm through a safe culture, supervision and teaching children to keep themselves safe, in person and online.
- Help staff recognise concerns early and act promptly, without waiting for proof.
- Provide one clear procedure for reporting concerns and responding to disclosures.
- Set out the safeguarding responsibilities of the Advisory Board, School Director, Designated Safeguarding Lead (DSL) Team and all adults.
- Explain how cases are managed with parents and referred to Ugandan authorities.
- Uphold safer recruitment, professional conduct and fair handling of allegations against adults.
- Keep safeguarding records accurate, secure and lawfully shared.
- Make sure staff are trained and that safeguarding practice is monitored, reviewed and improved.

The policy complies with Ugandan law and draws on recognised international good practice.

3. KISU Safeguarding Commitment

KISU is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, inside and outside school, in an environment where every child is safe, respected, heard and able to learn. Safeguarding is everyone's responsibility and the child's best interests are paramount.

The school will:

- Ensure the Advisory Board, School Director, Head of Primary/Secondary and all staff understand their responsibilities, are alert to signs of abuse and refer concerns to the DSL.
- Prevent harm through safe systems, supervision, education and a culture in which concerns can be raised and teach to keep safe.
- Identify concerns early, respond promptly without waiting for proof, and support any child who has been harmed or is at risk.

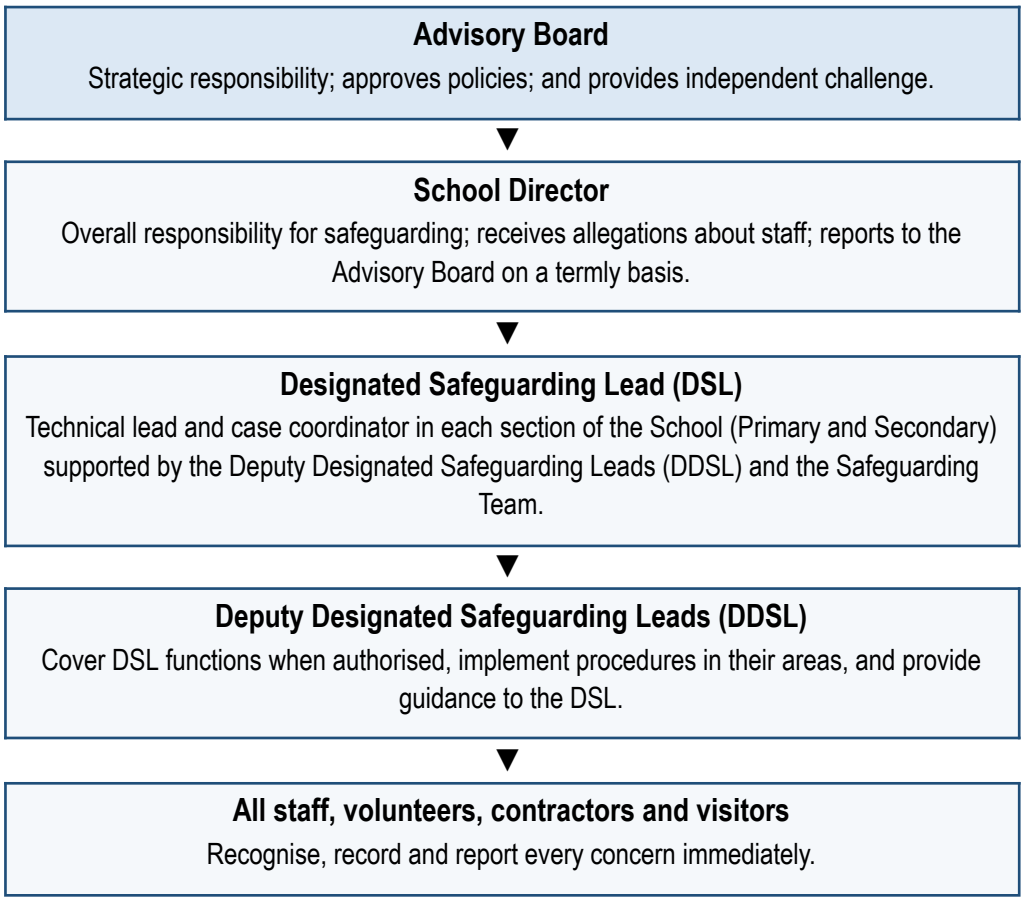
- Work lawfully with parents, health professionals, Police, Probation and Social Welfare Officers (PSWOs) and other agencies.
- Recruit safely and manage concerns about adults fairly while giving child safety first consideration.
- Learn from incidents, complaints, student voice and audits, and resource this policy properly.

No cultural practice, family status, reputation, achievement, financial position or institutional interest overrides a child's right to protection.

4. Scope of the policy

A child is defined as any person under the age of 18 years old. The policy applies wherever KISU has responsibility for, contact with or information about a child: On campus, online, on transport, trips, sports, clubs, work experience, residential or host-family arrangements and third-party activities. It applies to all employees, Advisory Board members, agency workers, consultants, volunteers, interns, coaches, drivers, security, domestic and catering staff, contractors, visitors and organisations using school premises or systems.

5. KISU Safeguarding Structure



5.1 Safeguarding Team

Role:	Name:	Section:	Contact:
School Director	Mr Daniel Grimshawe	Whole School	schooldirector@kisu.com
Head of Secondary	Mr Simon Welch	Secondary	secondaryhead@kisu.com
Head of Primary	Mrs Robyn Mason	Primary	primaryhead@kisu.com
DSL (Primary)	Ms Caroline Akinyi	Primary	deputy.hop@kisu.com
DSL (Secondary)	Ms Natalie Coley	Secondary	n.coley@kisu.com
Deputy DSL (Primary)	Ms Annabelle Mutesi	Primary	counsellor@kisu.com
Deputy DSL (Secondary	Mr Robert Buga	Secondary	r.buga@kisu.com

6. Legal and Regulatory Framework

This policy reflects:

- The Constitution of the Republic of Uganda, 1995, including Article 34 (Rights of children).
- The Children Act, Cap. 59, as amended by the Children (Amendment) Act, 2016.
- The Prevention of Trafficking in Persons Act, 2009.
- The Female Genital Mutilation Act, 2010.
- The Penal Code Act, Cap. 120, including the offence of defilement (Section 129) and related sexual offences.
- The Computer Misuse Act, 2011, and the Data Protection and Privacy Act, 2019.
- The Employment Act, 2006, and the Employment (Recruitment of Ugandan Migrant Workers) Regulations, where relevant to staff recruitment.
- The National Child Policy.
- The UK Department for Education's 'Keeping Children Safe in Education' guidance

This policy is available to all parents/guardians on the school's website and is published on the School's Directory for all staff to access.

Its main elements are:

- Management of safeguarding, including the appointment of designated staff and staff training.
- Definitions of abuse and significant harm.
- Procedures for dealing with concerns about a child.
- Safe recruitment practice, including checking the suitability of staff and volunteers to work with children, and appropriate induction and training.
- Arrangements for handling allegations of abuse against members of staff, volunteers and the School Director.
- Raising awareness of child protection issues and equipping children with the skills needed to help keep themselves safe.
- Supporting children who may have been abused, with support from outside agencies where necessary.

6.1 The United Nations Convention on the Rights of the Child (UNCRC)

International Child Rights Framework

KISU's safeguarding policy is informed by the **UN Convention on the Rights of the Child (UNCRC)** and the **African Charter on the Rights and Welfare of the Child**, both ratified by Uganda.

The policy is guided by the principles that:

- All children have equal rights to protection from abuse, neglect and exploitation.
- Every child has the right to life, survival, development and the opportunity to reach their potential.
- Children must be protected from discrimination and harmful influences.
- Children's views must be heard and given appropriate weight according to their age and maturity.
- All children must be treated with dignity and respect.

- Safeguarding is everyone's responsibility, including all individuals and organisations working with or on behalf of KISU.

7. Management of Safeguarding

7.1 The School Director

The **School Director** has overall responsibility for ensuring that effective safeguarding and child protection arrangements are in place across the school. The School Director will ensure that safeguarding is prioritised, that appropriate policies and procedures are implemented and that the school meets its statutory and regulatory responsibilities.

The School Director will work closely with the DSL and Advisory Board to provide effective oversight of safeguarding, including reviewing safeguarding policies, procedures, risks and trends in cases.

Safeguarding will be reviewed regularly by the Senior Leadership Team and Advisory Board during their respective meetings, with the School Director and Designated Safeguarding Lead (DSL) providing appropriate reports and updates.

The School Director is responsible for all safeguarding matters at KISU and will:

- Ensure that this policy and its procedures are fully implemented and regularly reviewed.
- Ensure that they and the Designated Safeguarding Lead (DSL) are suitably trained and remain up to date with internationally recognised safeguarding procedures and best practice.
- Take overall responsibility for safeguarding cases referred to them.
- Report significant safeguarding concerns and cases to the Chairman of the Advisory Board as appropriate.
- Provide the Advisory Board with a termly report on significant safeguarding matters, including relevant trends, actions and developments (Where trends have been identified).

7.2 Designated Safeguarding Lead (DSL)

Each section of the School has a Designated Safeguarding Lead (DSL) and at least one Deputy Designated Safeguarding Lead (DDSL). The DSL and DDSL are trained to an advanced (Level 3 equivalent) standard, refreshed at least every two years.

- The DSL, together with the School Director, School Nurses, and the School Counsellor, forms the Safeguarding (Child Protection) Committee. Members of this team are most likely to have a complete safeguarding picture and are best placed to advise on the school's response to concerns. The DSL has sufficient status and authority within the school to ensure that all concerns are progressed promptly.
- When a child leaves the school, the DSL will ensure that any safeguarding concerns are shared with the appropriate persons or agencies at the receiving school.
- The role and responsibilities of the DSL and DDSL are set out in full in Appendix 1.

7.3 Managing Referrals

- It is the responsibility of the DSL to coordinate action within the school and liaise with other agencies.
- All allegations or concerns about any member(s) of staff must be reported directly to the School Director either in person or using the Google Form on the Directory. Staff reporting a concern must keep it strictly confidential and not share details with anyone except the School Director (this includes the DSL where the concern relates to them). Staff are encouraged to report matters immediately when they become known.

- If a crime may have been committed, the School Director will report the matter to the Uganda Police Child and Family Protection Unit.
- The DSL supports staff who make referrals using CPOMS.
- The DSL records and monitors all concerns, discussions and decisions made on CPOMS. This includes the rationale for those decisions, whether a referral was made to another agency. All records are stored securely on CPOMS.

7.4 Training Staff

- The DSL and DDSL are trained, at least every two years, in child protection and safeguarding.
- All members of staff, including newly appointed, part-time staff and volunteers, are made aware of the school's safeguarding policy and procedures, and of any updates or changes to these. The school uses The National College for compliance and requires all personnel to read this policy and confirm it has been read.
- All staff receive annual training at the start of the academic year on safeguarding updates by the School Director and DSL.
- Safeguarding training is also updated during the year via email and/or staff meetings, as agreed by the DSL.
- Records of safeguarding training (annual, DSL/DDSL, safer recruitment, first aid) are maintained via The National College.
- Any staff involved in recruitment receive annual safer recruitment training via the National College.

7.5 Headteachers and Deputy Headteachers

Headteachers and Deputy Headteachers are responsible for ensuring that safeguarding and child protection procedures are implemented effectively within their areas of responsibility. They will work closely with the School Director, DSL and staff to maintain a strong safeguarding culture.

They will:

- Ensure staff understand and follow safeguarding procedures.
- Support the DSL in responding to and managing safeguarding concerns.
- Promote a culture where children feel safe, listened to and able to raise concerns.
- Monitor safeguarding risks, including those relating to behaviour, attendance, supervision and online safety.
- Ensure safeguarding is considered in daily school operations and activities.
- Report concerns promptly to the DSL in accordance with school procedures.
- Maintain appropriate confidentiality when handling safeguarding information.
- Escalate concerns about the DSL to the School Director and concerns about the School Director to the appropriate Advisory Board representative.

7.6. Staff

School staff, because of their day-to-day contact with children, are well placed to observe the outward signs of abuse. All staff should understand the procedures in this policy and their role within them, including identifying emerging problems, liaising with the DSL, and sharing information to support early identification and assessment.

The school will therefore:

- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the school whom they can approach if they are worried.

- Include opportunities in the pastoral curriculum for children to develop the skills they need to recognise and stay safe from abuse.
- Provide regular and appropriate safeguarding and child protection training in line with current advice and online safety guidance, updated regularly.
- Provide regular safeguarding and child protection updates (via email or staff meetings), at least annually.

7.7 Students

KISU takes a proactive, preventative and educative approach to safeguarding its Students. Opportunities are sought within the curriculum, activities and pastoral programme to raise awareness and teach Students how to protect themselves from harm and take responsibility for their own and others' safety.

Avenues for this education include:

- School and year-group assemblies
- Pastoral discussions between students and the wider pastoral team, including the School Nurses and Counsellor
- Online safety presentations and curriculum content
- Student voice, such as leadership roles, committees and student councils
- From time and year-group meetings with the school counsellor or circle time
- Year-group PSHE/RSHE sessions, including external speakers where appropriate

These opportunities are delivered in an age-appropriate way, with priority given to an emotionally safe environment, clear ground rules of confidentiality, and identification and management of vulnerable students in line with this policy. Learning opportunities aim to build students' confidence to communicate about safeguarding issues, including asking questions and disclosing concerns.

The school provides pastoral support that is accessible to all students, who know to whom they can talk about their concerns and that these will be taken seriously. Students' school email accounts and school-network internet use are monitored to ensure responsible use. At the start of each school year, all students sign a Responsible User Policy (RUP), which covers information on responsibly using the internet.

7.8 Volunteers, contractors and visitors

Volunteers, contractors, transport providers, coaches, visitors and third-party users are covered by this policy and receive role-appropriate checks, supervision, identification, access limits, conduct expectations and reporting instructions.

7.9 Safeguarding/Child Protection Committee

The Safeguarding/Child Protection Committee advises on the school's response to concerns and monitors safeguarding. It does not replace the DSL's case authority or receive details unless absolutely necessary.

Element	Requirement
Chair	Director or delegated senior leader (or the DSL if appointed), with a route for independent Board challenge; The Chair calls meetings and keeps minutes.
Members	Could include: DSL, DDSL, School Director, Head of Learning Support, School Nurses, School Counsellor; HR, IT/online safety, operations/security and other incorporated staff where appropriate.

Element	Requirement
Frequency	At least every term and after a serious incident or emerging risk.
Reviews	Anonymised trends, referrals, missing children, child-on-child incidents, allegations, low-level concerns, recruitment, training, filtering and monitoring, premises, transport, trips, contractors and student voice.
Outputs	Action log with owners and deadlines; annual effectiveness report and improvement plan to the Advisory Board.

8. Safeguarding Culture and Prevention

8.1 Creating a culture of safeguarding

KISU accepts that harm can occur in any family, community or institution. Leaders welcome challenges, act on low-level concerns and examine patterns. The school's values, behaviour policy, DEIJB policy, and pastoral system support a zero-tolerance approach to sexism, misogyny/misandry, homophobia, biphobia and sexual violence or harassment. No one suffers retaliation for a good-faith report; an unsubstantiated concern is not automatically malicious.

8.2 Listening to children

The school maintains an environment where children feel secure, are encouraged to talk and are listened to. Children know which adults they can approach, what happens after a report and why adults cannot promise secrecy. Reporting routes include trusted adults, the counselling service, the DSL team and anonymous reporting where feasible. Staff must report rumours, overheard comments and indirect disclosures.

8.3 Pupil voice and participation

Student leadership roles, committees and councils, together with surveys, focus groups and reporting data, are used to understand where children feel unsafe. Including hidden locations, transport, changing areas, toilets, online spaces and supervision times.

8.4 Teaching children how to stay safe

Safeguarding, including online safety, is taught through assemblies, pastoral and form time, circle time, counsellor sessions, online-safety content and a timetabled RSHE/PSHE programme with external speakers where appropriate. Teaching is age-appropriate, inclusive and delivered in an emotionally safe setting. It covers topics such as; healthy relationships, boundaries, consent and body autonomy; prejudice and equality; self-esteem; bullying and bystander action; recognising abusive and coercive relationships; exploitation, grooming, harassment, online safety and image sharing; and how to get help.

8.5 Promoting wellbeing and resilience

Pastoral support, including an in-school counselling service, is accessible to all students. The curriculum and co-curricular programme build resilience, including radicalisation. Staff understand how adverse childhood experiences can affect mental health, behaviour and learning.

8.6 Recognising emerging concerns

Early help means coordinated support as soon as a problem emerges, before risk escalates; it never replaces child-protection action. Staff should be particularly alert where a child: has SEND or a disability; is drawn into anti-social or criminal behaviour or gangs; goes missing from home; has repeated suspensions or risk of exclusion; misuses drugs or alcohol; is at risk of trafficking, exploitation or radicalisation; lives with parental substance misuse, mental ill-health, domestic abuse or offending; shows early signs of abuse or neglect; or is privately fostered. Staff discuss such concerns with the DSL, who decides on action and any inter-agency assessment.

8.7 Working with families

The school publishes this policy with child-and parent-facing summaries (See Appendix 6 & 6.1) and offers parents workshops on the following topics; Online safety, supervision, abuse indicators, relationships, attendance and reporting. Children, staff and parents sign Responsible User Policies on a yearly basis in order to access the internet and use school owned devices.

8.8 Raising Awareness

The school ensures that all children are taught about safeguarding, including online safety, through teaching and learning opportunities as part of a broad and balanced curriculum, e.g. through PSHE/RSHE, Circle Time, Assemblies.

8.9 Safeguarding/Child Protection Committee

The Safeguarding/Child Protection Committee will meet at least once every term to discuss safeguarding concerns and actions needed. It normally consists of the DSL, DDSL, School Director, Head of Learning Support, School Nurses, and the School Counsellor. A chairperson of the committee should be appointed, responsible for calling meetings and keeping minutes.

8.10 Contextual Safeguarding

The school recognises that safeguarding incidents and behaviour can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL and DDSL, should consider the context within which such incidents occur; known as contextual safeguarding-meaning assessments of children should consider whether wider environmental factors in a child's life are a threat to their safety and/or welfare.

8.11 Filtering and Monitoring

The school employs a suitable firewall as the primary line of internet content filtering. The firewall implements a school-standard content filtering policy, blocking non-educational streaming websites, inappropriate content and social media platforms. All internet content, services and platforms accessed using the school network, whether via school-owned or personal devices, are reviewed, permitted or blocked by the firewall. If an educational website is incorrectly blocked, the school's ICT administrator can request its exemption. The firewall monitors device internet traffic and stores logs of potential violations for analysis and action. The DSL can guide firewall policy and request ICT assistance to investigate online incidents.

8.12 Using Mobile Phones and Cameras

Photographs provide an important source of evidence of children's achievements and progress. However, the internet has become a significant tool in the distribution of indecent images of children, exacerbated by the growth of mobile devices with cameras. To ensure the safety and welfare of children in our care, this policy sets out protocols for the use of electronic devices able to take pictures, record videos, or send and receive calls and messages in school. The school will endeavour to ensure:

- On admission, parents give consent for images and recordings of their children to be used for legitimate purposes.

- A pupil's full name is not used alongside a published photograph without direct parental consent.
- Children are appropriately dressed in all images (e.g. bodies submerged in the water in swimwear).
- Parents, carers and visitors are reminded not to take or share photographs/videos of children other than their own without consent, e.g. at school plays or sports days. This is directly referenced within our '*Parent Code of Conduct.'*
- All equipment used and recorded images are available for scrutiny.
- All staff and students sign an RUP for responsible use of devices.
- Publishing of photos on social media is explicitly prohibited without permission from the Director.
- When students bring their own devices to school, they are made aware of the policy on how and when these may be used.

8.13 Student Mobile Phone Policy

Following the UK Department for Education's (DfE) 2026 update to 'Keeping Children Safe in Education (KCSIE)', which took effect from 1st September 2026 and made mobile-phone-free schools the default expectation for English schools, KISU adopts the same principle as recognised international best practice, reflecting the DfE's statutory mobile phones in schools guidance.

KISU's default position is that students do not have access to personal mobile phones, smart watches or other personal internet-enabled devices during the school day, including lessons, time between lessons, breaktimes and lunchtime, other than by exception. Any departure from this default must be agreed in advance with the Head of Primary/Secondary or DSL and documented, for example on limited welfare, medical, SEND or travel-safety grounds.

The school's implementation of this policy includes:

- Specific Policies for Student and Staff Mobile Phone Use.
- Students hand in personal phones and at the start of the school day (to the Secondary Office) and these are returned at the end of the day upon collection.
- Students who travel to and from school independently and are permitted a phone for journey safety must keep it switched off and handed in for the duration of the school day, in line with the arrangements above.
- Confiscated/handed-in devices are stored securely, and any lost device is reported to and logged by the Secondary Office, which will attempt to contact the owner.
- Any breach of this policy is addressed through the school's behaviour policy; where misuse of a device raises a safeguarding concern (for example, indecent images, cyberbullying, or non-consensual sharing of images including AI-generated or 'deepfake' imagery), staff must follow the procedure in Appendix 3.

The rationale for a mobile-phone-free school day is safeguarding as much as behavioural. It reduces opportunities for cyberbullying, non-consensual sharing of images (including sexting and AI-generated or deepfake imagery), unsupervised contact from unknown adults, and unsupervised access to harmful online content during the school day, and supports Students' focus, wellbeing and face-to-face social development.

9. Safeguarding in the KISU Environment

9.1 Classroom safeguarding

Learning spaces keep adults and children visible. One-to-one work is visible, authorised and in suitable spaces

9.2 Supervision

Supervision is matched to age (2-18), including early-years ratios and collection arrangements. Children given time alone are continuously monitored by a nearby adult.

9.3 Toilets and changing areas

These less-supervised spaces are reviewed through pupil voice. Intimate care preserves dignity and follows agreed plans. No photography is permitted in any bathrooms.

9.4 Playgrounds and break times

Supervision at break and lunch is targeted using pupil feedback and reporting data. Students do not have access to phones at these times.

9.5 Trips and residential visits

The School Director ensures appropriate DSL/DDSL cover and out-of-hours escalation arrangements are in place for trips, residentials and host-family arrangements. During all school educational visits, the School Director and Headteachers will be available by telephone to provide support and respond to safeguarding emergencies.

9.6 Sports and swimming

Coaches are checked like other adults. Physical contact in coaching must be necessary and appropriate. Children must be appropriately dressed in any photographs that are taken.

9.7 After-school Co Curricular Activities (CCA) Programme

All CCAs, including those run by third parties, follow this policy and the 'coaches code of conduct.'

9.8 Visitors and contractors

All visitors and contractors on campus must identify themselves by wearing a visitor badge, which is issued upon signing in at the Reception Desk. Visitors and contractors will have limited access to the campus and must remain appropriately supervised by a member of staff throughout their visit.

9.9 External providers

Contracts must allow the school to restrict access or end an arrangement for safeguarding breach. Technology vendors undergo safeguarding, privacy and security checks.

9.10 Off-site and community activities

The policy applies to work experience and off-site activities, and the school considers community risks in line with contextual safeguarding.

10. Definitions

10.1 Abuse

Abuse is a form of child maltreatment. A child may be abused or neglected through the infliction of harm or failure to prevent

harm. Harm may be physical or non-physical and can include the impact of witnessing the abuse of others, such as domestic abuse. Abuse can occur within the family, school, community or other settings, and may be perpetrated by adults or other children. It may occur online or involve technology that facilitates abuse offline.

All staff, particularly the DSL and DDSL, should remain alert to the risk of **extra-familial harm and exploitation**. This may include emotional or sexual abuse, sexual harassment or exploitation, abuse within intimate relationships, criminal exploitation, serious youth violence and radicalisation. **Absence from school may also indicate an underlying safeguarding concern and should be followed up appropriately.**

10.2 Significant Harm

There are no absolute criteria for judging what constitutes significant harm. Whether harm suffered by a child is significant relates specifically to the child's health and development, compared with what could reasonably be expected of a similar child and the parenting we would reasonably expect them to receive.

10.3 Early Help

Any child may benefit from early help, but staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs, or has special educational needs;
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement;
- Is frequently missing/goes missing from home;
- Has experienced multiple suspensions or is at risk of permanent exclusion;
- Is misusing drugs or alcohol;
- Is at risk of modern slavery, trafficking or exploitation;
- Is in a family circumstance presenting challenges, such as substance abuse, adult mental health problems or domestic abuse;
- Is showing early signs of abuse and/or neglect;
- Is at risk of being radicalised or exploited;
- Has a parent or carer in custody, or is affected by parental offending;
- Is privately fostered.

Early help means providing support as soon as a problem emerges at any point in a child's life. Staff who consider a pupil may benefit from early help should discuss this with the DSL, who will consider appropriate action in accordance with Ugandan law and where appropriate, liaise with external agencies and professionals in an inter-agency assessment.

11. Types and Signs of Abuse

11.1 Physical Abuse

Physical abuse deliberately causing physical harm to a child. This may include hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may also include fabricating or deliberately inducing illness. Indicators may include unexplained or inconsistent injuries, bruising, burns or injuries that reflect an object.

11.2 Neglect

Neglect is the persistent failure to meet a child's basic physical or emotional needs, which may seriously affect their health or

development. It may include failing to provide adequate food, clothing, shelter, supervision, protection from harm or access to appropriate medical care. It may also include failing to meet a child's emotional needs.

11.3 Affluent Neglect

Affluent neglect is neglect experienced by children in well-resourced families and may be difficult to identify because it can be primarily emotional. It may include:

- Excessive academic or personal pressure.
- Limited parental time or emotional engagement.
- Children being left alone or cared for by others for extended periods.
- Excessive extracurricular commitments limiting family time.
- Using material possessions or activities in place of emotional support and parental involvement.

11.4 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child that adversely affects their emotional development. It may include humiliation, criticism, rejection, intimidation, silencing, unrealistic expectations, overprotection or restricting normal social interaction. It may also include exposure to domestic abuse, serious bullying or cyberbullying. Emotional abuse can occur alongside other forms of abuse.

11.5 Sexual Abuse

Sexual abuse involves forcing, coercing or grooming a child to participate in sexual activity, whether or not they understand what is happening. It may involve physical contact or non-contact activities, including exposure to or involvement in sexual images or sexual activity. Sexual abuse can occur online or offline and can be perpetrated by adults or other children of any gender.

Under Uganda's **Penal Code Act**, sexual intercourse with a person under 18 is an offence of defilement under Section 129, regardless of whether consent is given.

Behavioural Indicators of Abuse in Children

- Physical marks
- Self-injury
- Withdrawal from activities
- Loss of appetite/eating concerns
- Poor hygiene
- Fears
- Worrying/unusual behaviour
- Excessive tiredness
- Inappropriate contact/talk/play/relationships
- Drawing or writing that causes concern

11.6 Child Sexual Exploitation (CSE)

Child Sexual Exploitation (CSE) is a form of sexual abuse where a child under 18 is manipulated, coerced or deceived into sexual activity through an imbalance of power, often in exchange for something they need or want or for the benefit of the perpetrator. It may occur with or without physical contact and can take place online.

Children may be more vulnerable to CSE due to factors such as family difficulties, previous abuse, social isolation, peer pressure or exploitation, although CSE can affect any child regardless of their circumstances.

Behavioural Indicators of CSE

- Acquisition of money, clothes or phones without plausible explanation
- Gang association and/or isolation from peers
- Unexplained absences from school
- Leaving home without explanation, persistently going missing or returning late
- Excessive receipt of texts/calls/online communication
- Returning under the influence of drugs or alcohol
- Inappropriate sexualised behaviour for age
- Relationships with controlling or significantly older individuals
- Concerning use of the internet or social media
- Increasing secretiveness
- Self-harm or significant changes in emotional wellbeing

11.7 Child-on-Child Abuse

KISU has students from aged 18 months to 18 years, and appropriate supervision is in place accordingly. Children can abuse other children; generally referred to as child-on-child abuse, which can take many forms, including but not limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children
- Physical abuse, such as hitting, kicking, biting or hair-pulling (which may include an online element)
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks and online sexual harassment
- Causing someone to engage in sexual activity without consent
- Consensual and non-consensual sharing of nude or semi-nude images (sexting)
- Upskirting
- Initiation or hazing-type violence and rituals

Child-on-child abuse should never be tolerated or dismissed as 'banter' or 'part of growing up'; it is unacceptable and will be treated seriously. Whenever a child may have harmed another, the school is aware of its responsibilities to both children. Where there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm, this is a child protection concern. In the event of child-on-child abuse, all children involved (whether alleged perpetrator or victim) are treated as being 'at risk'. Cases of a criminal nature may be referred to the appropriate authority.

Important Considerations Following a Report

- The wishes of the victim as to how to proceed, especially in cases of sexual violence or harassment
- The nature of the alleged incident(s), including whether a crime may have been committed
- The ages and developmental stages of the children involved

- Any power imbalance between the children
- Whether the incident is a one-off or a sustained pattern
- Ongoing risks to the victim, other children or staff
- The proximity of the alleged perpetrator and victim during and after the investigation

11.8 Child Criminal Exploitation (CCE)

CCE involves exploitative situations, contexts and relationships where young people (or a third person) receive 'something' — for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts or money- because of completing a task on behalf of another, often of a criminal nature. CCE often occurs without the child's immediate recognition, with the child believing they are in control. Those exploiting the child hold power over them by virtue of age, gender, intellect, physical strength or economic resources; violence, coercion and intimidation are common. Uganda's Prevention of Trafficking in Persons Act, 2009 provides the statutory framework for identifying and responding to child trafficking and exploitation.

11.9 Domestic Abuse

Domestic abuse can encompass a wide range of behaviour and may be a single incident or a pattern of incidents - psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse: They may see, hear or experience the effects of abuse at home, and/or suffer abuse in their own intimate relationships. This can have a detrimental and long-term impact on a child's health, wellbeing, development and ability to learn.

12. Recognising Safeguarding Concerns

12.1 What is a safeguarding concern?

Safeguarding is protecting children from maltreatment and harm (at home, in school, in the community and online), preventing impairment of health or development and ensuring safe and effective care. **Child protection** is the part of safeguarding concerned with children experiencing, or at risk of, abuse, neglect, exploitation or significant harm.

Abuse is maltreatment by inflicting harm or failing to prevent it, by adults or other children, in any setting, online or offline; it includes the impact of witnessing abuse. **Significant harm** is serious ill-treatment or impairment of health or development, judged against what could reasonably be expected for a similar child. Staff must report well before this threshold is reached.

12.2 Signs and indicators of abuse

Indicators are not proof, may have an innocent explanation, and their absence does not exclude harm. Staff consider age, development, disability, culture and context, record what they observe and report to the DSL; they do not diagnose or investigate.

13. Specific Safeguarding Issues

The school is vigilant regarding specific safeguarding issues that may include, but are not limited to: Child Sexual Exploitation, Child Criminal Exploitation, radicalisation, bullying, domestic abuse, drug abuse, fabricated or induced illness, Female Genital Mutilation, forced or early marriage, missing children, gang and youth violence, gender-based violence, mental health, cyberbullying (including sexting), and trafficking.

13.1 Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs. It is illegal in Uganda under the *Female Genital Mutilation Act, 2010,* and is a form of child abuse with long-lasting, harmful consequences.

The school recognises its duty to report suspected cases of FGM involving children to the Uganda Police Child and Family Protection Unit or the Probation and Social Welfare Officer. The school will seek further clarification from parents requesting extended periods of absence for their daughters and will be mindful of children travelling to areas where FGM is known to be practised, engaging with parents to seek further information as appropriate.

13.2 Online and Digital Safeguarding

Online risks
Online safety runs through safeguarding, curriculum, IT, behaviour, data protection and parent workshops.

Online abuse may happen wholly online or lead to harm offline. It includes:

- Grooming
- Sexual extortion
- Cyberbullying
- Stalking
- Impersonation
- Image abuse
- Deepfakes
- Exploitation through games or social media

The four areas of risk:

- **Content:** e.g. pornography, self-harm, extremism, misinformation
- **Contact:** e.g. grooming
- **Conduct:** e.g. bullying, harmful behaviour
- **Commerce:** e.g. gambling, scams

Children learn about online risks from Year 1 upward.

13.3 Social media

Social media is blocked on the school network. Staff must not have social-media relationships with Students. This means adding students on social media when they are currently enrolled at the school. Parents/Guardians may photograph their own children at events but should not post images of others.

13.4 Personal Devices

KISU follows a mobile-phone-free school day, using KCSIE 2026 as a benchmark.

- **Rule:** Students have no access to personal phones, smart watches or other internet-enabled devices during the school day, including breaks and lunch.

- **Storage:** Devices are handed in at the start of the day and stored securely with the Secondary Office. Students who travel independently keep their phones switched off and stored.
- **Exceptions:** Medical, SEND or travel-safety exceptions must be agreed in advance with the School Director or DSL and documented.
- **Confiscation and search:** Searches and confiscation of items must be carried out in accordance with the school's approved procedures. At any point during the school day, a student's bag may be searched where there is reasonable cause to believe it contains a prohibited or unauthorised item. Searches may only be carried out by a Key Stage Coordinator or a member of the Senior Leadership Team. Where a bag search is required, two authorised members of staff must be present, including one male and one female member of staff.
- **Breaches:** General breaches are addressed in accordance with the Behaviour Policy. Where misuse raises a safeguarding concern, it will be managed in accordance with this Safeguarding Policy alongside the Behaviour Policy.

13.5 Cyberbullying

Includes abusive or harassing messages, non-consensual image sharing and sending unwanted sexual content. It is managed as child-on-child abuse (Section 11.7)

13.6 Grooming and exploitation

Grooming is a gradual pattern in which an adult builds a child's trust and dependence to gain access, control and privacy, placing the child at risk of sexual or other abuse. It can occur in person or online and may lead to sexual extortion or exploitation.

13.7 AI and emerging technologies

The school addresses privacy, bias, unsafe prompts, manipulative chatbots, impersonation, deepfakes and sexualised image manipulation. Staff and students use approved systems only. For further information, please see the 'AI Policy'.

13.8 Photography and images

Parents consent to image use on admission. Images are taken and stored only on school devices without social-media access; full names are not published with photographs without parental consent (Data Protection and Privacy Act 2019); children are appropriately dressed in all images; equipment and images are open to scrutiny. Children must not photograph or share images of others without permission. Staff teach children about the risks of sharing images, including their own.

13.9 Filtering and monitoring

Senior leaders own the strategy, the DSL interprets risk and IT implements controls. A firewall filters all network traffic (school-owned or personal devices) blocking inappropriate content, non-educational streaming and social media without unreasonable overblocking (the ICT administrator can unblock educational sites). Traffic, school email and network use are monitored and logged; alerts are reviewed under a documented escalation procedure. Controls are tested at least annually and after changes or incidents; access is role-based and removed promptly for leavers.

13.10 Digital communication between staff and Students

Staff communicate with Students only through approved school accounts and channels. Remote lessons use approved accounts, professional settings, attendance controls, recording rules and reporting routes. Personal phone numbers are not to be shared with students or parents under any circumstance. Digital communication should only be through email or a school issued phone.

13.11 Children Missing from Education

A child with unexplained or persistent absences may be showing a warning sign of abuse or neglect. The school registers all children daily and follows up on unaccounted absence. Parents are expected to inform the school at the earliest opportunity, and

within 24 hours in writing, of any absence. Early intervention helps identify any underlying safeguarding risk and prevent the risk of a child going missing from education in future.

13.12 Children with Special Educational Needs (SEN) and Disabilities

Children with additional educational needs (SEN) and disabilities can face additional safeguarding challenges. Barriers to recognising abuse and neglect in this group include assumptions that indicators of possible abuse (behaviour, mood, injury) relate to the child's disability without further exploration, and the disproportionate impact of bullying and communication barriers on this group. Any reports of abuse involving children with SEN and disabilities require close liaison with the DSL/DDSL and the Head of Learning Support.

13.13 Preventing Radicalisation

The risk of radicalisation is the product of a number of factors, and identifying it requires staff to exercise professional judgement and seek further advice as necessary. Potential indicators include use of inappropriate language, possession of extremist material, behavioural change, expression of extremist views, advocacy of violent action, or association with or recruitment by known extremists. The school provides staff awareness training, with the DSL holding primary responsibility, so that staff can identify vulnerable individuals and respond appropriately. The school promotes values that build children's resilience to radicalisation through the curriculum, PSHE and co-curricular activities, and maintains internet filters to reduce, as far as reasonably possible, children's exposure to extremist material online.

13.14 Mental Health

The school will deal with matters surrounding mental health, body image and the risk of self-harm as they arise. In cases of immediate concern, the School Nurse, together with the School Counsellor, will conduct a risk assessment and, where appropriate, seek further expertise from a relevant agency (see Appendix 5). The school supports children experiencing difficulties and provides an in-school counselling service.

Where children have suffered abuse, neglect or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and adulthood. Staff should be aware of how these experiences can affect a child's mental health, behaviour and education.

13.15 Adverse Childhood Experiences (ACEs)

Definition

ACEs are potentially traumatic experiences before age 18. They include physical, emotional or sexual abuse; physical or emotional neglect; and household challenges such as domestic violence, parental substance misuse or mental illness, parental separation and imprisonment of a family member.

Why it matters

Repeated adversity without the support of a caring adult can harm a child's development, behaviour, learning and long-term health. The effects can be reduced by protective factors, especially a stable, trusted relationship with an adult.

Responding to concerns

Any sign or disclosure of abuse, neglect or risk of harm must be reported to the Designated Safeguarding Lead. Staff must listen calmly, not promise confidentiality and record concerns factually in the child's own words. Where there is no immediate risk, the DSL will arrange appropriate early help or referral.

Confidentiality

Information about a child's experiences is recorded securely and shared only on a need-to-know basis, in line with the school's Safeguarding Policy. A child's safety always overrides confidentiality.

13.16 Staff Ethical Code of Conduct

Staff will ideally never place themselves alone with a child. Where this is necessary and appropriate, staff must use a location with good visibility, at a time when other adults are present and in the vicinity. This may include the occasional use of a personal car to return a child home safely or, in an emergency, for treatment. The latter must be approved by the School Director prior to using a personal vehicle.

Staff will ensure physical contact is necessary, professional, culturally sensitive and appropriate at all times (staff receive relevant training). The school acknowledges that professional physical contact is sometimes appropriate, for example when modelling actions in music, coaching, offering appropriate comfort, or restraint where a child is at risk of harm to themselves or others. Staff must make a professional judgement as to whether such contact is necessary and whether the child has sufficient trust and confidence in them; if in doubt, staff should always ask. In addition, all staff are trained in using reasonable force via the National College on an annual basis.

13.17 One-to-One Interactions

It is a routine and necessary part of education for adults to work one-to-one with children at KISU. particularly relevant to individual music tuition, learning support and counselling, but not limited to these. Working one-to-one with a child carries increased safeguarding risk for both adults and children, and additional guidance applies. Anyone working one-to-one with a child will adhere to the following:

- Adults working one-to-one with children will have completed full safeguarding checks (e.g. police clearance, online checks, reference checks and completion of school paperwork).
- Adults will be fully aware of emergency procedures, including any specific to the location.
- Managers and other staff will be made aware that one-to-one work is occurring, and where.
- Physical contact will always be avoided in one-to-one situations. If physical comfort is sought by a child (it must never be initiated by an adult), the adult will not refuse it but will be particularly mindful of appropriate body position and continued verbal communication.
- Where possible (while maintaining confidentiality), one-to-one work will be conducted in a public location with clear visibility and/or with doors open and uncovered windows.
- Any incident of concern, including one that could be misinterpreted, will be reported immediately to a senior member of staff and/or the DSL, and recorded with a clear date and time, then signed (Appendix 2).
- If a child becomes physically violent and does not respond to requests to calm down or leave the room, the adults will remove themselves, call for help and remain nearby to ensure the child's (and others') safety.
- Children given time alone (for example, for emotional needs) will be continuously monitored by a nearby adult.

13.18 Taking of Images on Mobile Devices

When using digital images, staff inform and educate children about the risks associated with taking, using, sharing, publishing and distributing images, including the risks of publishing their own images online. Parents are welcome to take photographs and videos of their children at school events for personal use but should not publish these on social media or comment on activities involving other children in shared images.

Staff and volunteers may take digital images to support educational aims but must follow school policy on sharing, distribution and publication. Children must not take images of others without permission, and may not use, share, publish or distribute images of others without written permission from a parent or guardian (or the student, if over 18). Photographs published on the school website or elsewhere will be selected carefully to comply with good practice guidance, and the school will avoid using children's full names alongside published photographs without parental permission, having due regard to the Data Protection and Privacy Act, 2019.

13.19 Grooming and Inappropriate Behaviour

Grooming is a subtle pattern of behaviour, consistent with an adult intentionally enticing a child into an emotionally dependent or sexual relationship over time, resulting in greater trust being placed in the adult. Increased trust permits greater access to, control over and privacy with the child, placing them at greater risk of harm or abuse. Grooming can occur face to face or online.

If behaviour raises concern regarding treatment of a child but does not meet the school's definition of abuse, this will be recorded as inappropriate behaviour - for example where the staff code of conduct (Appendix 7) has been breached but harm has not occurred or harm has been negligible. Inappropriate behaviours may include, but are not limited to: verbal aggression, unwanted hugs, teasing, mocking or inappropriate electronic communication.

13.20 Upskirting

'Upskirting' is where someone takes a picture (photo or video) under a person's clothing, without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification or to cause the victim humiliation, distress or alarm. Anyone, of any gender, can be a victim. Where such conduct occurs it will be treated as a serious safeguarding matter and, depending on the circumstances, may amount to an offence under Uganda's Penal Code Act and/or Computer Misuse Act, 2011.

13.21 Contextual safeguarding

Harm can occur in peer groups, neighbourhoods, transport and online spaces as well as at home. Assessments consider whether these wider factors threaten a child's safety, and KISU acts on the environment where harm occurs as well as on the individual child's circumstances.

14. Procedure for Dealing with Concerns Surrounding a Child

14.1 Advice for Staff

Reporting Safeguarding Concerns

Any member of staff or volunteer who has a safeguarding concern, receives a disclosure or suspects that a child is being abused, neglected or is at risk of harm must report it immediately to the **DSL**. In the DSL's absence, concerns must be reported to the **DDSL**.

The school promotes a culture in which children can raise concerns with any trusted member of staff. Staff should be aware of the signs and indicators of abuse and understand that safeguarding concerns must always be shared. Staff should never feel that reporting a concern is disloyal or may affect their employment. The safety and welfare of children must always come first.

Children may not recognise their experiences as harmful or may be unable or unwilling to disclose concerns because of fear, embarrassment, threats, vulnerability, disability or language barriers. Staff must therefore maintain professional curiosity and report any concerns to the DSL, even where a child has not made a direct disclosure.

Any safeguarding information held by other staff prior to automating it on CPOMS must be shared with the DSL to ensure a complete record. When a child transfers to another school, the DSL will identify the receiving school's safeguarding contact and, where appropriate, securely transfer the child's safeguarding file upon request from the school.

14.2 Handling a Disclosure or Allegation From a Child

Children may disclose abuse directly or indirectly. Staff must listen calmly, take the child seriously and respond sensitively.

- Do not promise confidentiality. Explain that information may need to be shared with the DSL to keep the child safe.
- Do not blame, judge, make assumptions or promise that the situation will immediately improve.
- Avoid leading questions. Allow the child to explain in their own words and do not ask them to repeat their account unnecessarily.
- Record the disclosure **immediately using CPOMS**,(*or as soon as reasonably practicable*) including the date, time, location, those present and the child's words as accurately as possible.
- If you're unsure whether or not the disclosure was recorded, document this in an email to the **DSL/DDSL** on the same day. The email should contain your concerns about whether it was logged and confirm the DSL/DDSL received it.

14.3 Action When a Child Has Suffered or Is Likely to Suffer Harm

Once the School Director has been informed that a child may have suffered or is likely to suffer harm, they take charge of the matter and, in consultation with the DSL, will consider:

- Whether sufficient evidence exists to substantiate the original disclosure;
- When it is best to inform parents (provided this will not increase risk to the child);
- Whether a crime may have been committed, and how the integrity of any evidence can be assured;
- Whether the child needs medical attention (bearing in mind the integrity of evidence);
- Whether other children may be at risk from the same suspected source;
- How best to manage the spread of information, bearing in mind both the child's best interests and the presumed innocence of the suspected abuser until proven otherwise;
- If the suspected offender is a school employee, the arrangements needed for them to leave the school premises quickly and discreetly, and for their responsibilities to be covered. The employee should be informed in person that an allegation has been made and that they are suspended from work on full pay pending investigation. The identity of the child making the allegation must not be divulged wherever possible;
- Whether the alleged offender has been asked to provide a written statement within 24 hours and been interviewed off-site by the School Director and DSL within 72 hours;
- What agencies (see Appendix 5) can offer professional support;
- Whether the staff member who first received the disclosure requires support or counselling.

14.4 Incidents Involving Indecent Images of Children, Including 'Sexting'

Where an incident involving indecent images of children, including consensual or non-consensual sharing of nude or semi-nude images among students, comes to a staff member's attention, the guidance set out in Appendix 3 must be followed without exception and the matter reported to the DSL immediately.

14.5 Confidentiality and information sharing

Safeguarding information is shared only with those who need it to protect the child and is never withheld solely because consent is unavailable.

15. What happens after a concern is reported

The DSL coordinates the case until a competent external authority takes the statutory lead; the school's framework supports but never replaces Police, PSWO, medical or judicial functions.

Stage	Required action	Record
Receive	Receive the disclosure, observation, alert, absence or pattern. Do not wait for proof.	Initial concern, chronology
Make safe	Address danger, medical need, supervision, the alleged person's access, siblings and other children.	Safety decision
Assess	Harm, child's views, development, disability, family and wider context, protective factors, parent-notification risk.	Risk and needs assessment
Refer	Factual, timely referral to PSWO, Police, health or specialist service.	Referral and confirmation
Plan	Outcomes, actions, owners, timeframes, education support, contingency.	Child-centred case plan
Monitor and review	Coordinate support, follow up referrals, reassess risk at agreed dates or when circumstances change.	Chronology, review decision
Close or transfer	Only after risk and needs are reviewed; transfer securely when a child leaves.	Closure or transfer record

Once informed, the School Director and DSL consider: When to inform parents without increasing risk; whether a crime may have been committed and how to protect evidence; medical needs; risk to other children; controlling the spread of information while respecting the presumption of innocence; which agencies can help (Appendix 5); and support for the staff member who received the disclosure.

Level	Examples	Response
Emergency	Immediate threat, severe injury, acute sexual violence, child missing in danger, suicide attempt or access to lethal means.	Call 999/112 and medical services; supervise; notify DSL; preserve evidence; refer without delay.
Urgent	Suspected abuse, exploitation, trafficking, serious peer harm, escalating self-harm, unsafe home return, alleged adult access.	DSL safety assessment; same-day consultation or referral (Police, PSWO, health, Sauti 116); written plan.
Emerging	Early neglect, repeated low-level indicators, wellbeing or attendance patterns without immediate danger.	Report to DSL; assess promptly; agree support, monitoring and review; escalate if risk rises.

16. Concerns About Another Staff Member

Staff (including non-teaching staff, volunteers, contractors and extra-curricular providers) with a safeguarding concern about another member of staff that meets the allegations threshold should report it using the Google Form, located on the School Directory. Where a concern does not meet the harm threshold, it should be shared in accordance with the low-level concerns procedure (Appendix 2).

17. Record Keeping

The DSL maintains a record of every incident involving suspected or actual child protection issues using CPOMS. These records are confidential and ordinarily accessible only to the DSL and DDSL. Where it is in a child's best interests for a record to be disclosed to other agencies, this will be done carefully and in line with the Data Protection and Privacy Act, 2019.

The school keeps a single central record listing all adults who work at the school as employees or volunteers and the date and outcome of any background/police clearance check made in relation to each person. Where no check has been made, the record shows why it was not necessary.

18. Information About, Or Allegations Against, A Staff Member, The DSL, The School Director Or Volunteers

This includes all categories of staff, including volunteers, and short-term or peripatetic staff.

All allegations or concerns about any member of staff must be reported directly to the School Director. If the School Director is not available, the concern must be shared with the Head of Primary/Secondary. Staff reporting a concern must keep it strictly confidential, sharing details only with the School Director or Head of Secondary/Primary (this includes the DSL where they are not the subject of the concern). The School Director will then investigate. If the allegation is made against the School Director, it should be reported to the Chairman of the Advisory Board. Staff are encouraged to report matters immediately they are known.

Initial Considerations

On receipt of an allegation:

- The School Director will discuss the matter with relevant Senior Leadership as a matter of urgency.
- The School Director will, within one working day, notify the accused person, providing as much detail as possible at that time, and will inform the Chairman of the Advisory Board.
- If there is a concern that a criminal act has been committed, or that the school faces reputational damage, the Chairman must also be informed immediately, and the matter reported to the Uganda Police Child and Family Protection Unit.

At the initial strategy discussion, the options open to the school depend on the nature of the evidence and the allegation. Concerns (including allegations) that do not meet the harm threshold are referred to as 'low-level' concerns; these must still be managed, recorded, and any appropriate action taken to safeguard children. In some cases it may be appropriate to appoint an independent investigator.

The following definitions are used when determining the outcome of allegation investigations:

- **Substantiated**: There is sufficient evidence to prove the allegation.
- **Malicious**: There is sufficient evidence to disprove the allegation, and there has been a deliberate act to deceive.
- **False:** There is sufficient evidence to disprove the allegation.

- **Unsubstantiated:** There is insufficient evidence either to prove or disprove the allegation. This term does not imply guilt or innocence.
- **Unfounded**: There is no evidence or proper basis for the allegation.

19. Low-Level Concerns

It may be possible that a member of staff acts in a way that does not cause risk to children but is nonetheless inappropriate. A member of staff who has a concern about another member of staff should inform the School Director about their concern using a Low-Level Concern Form (Appendix 2).

A **low-level concern** does not mean the behaviour is insignificant. It refers to any concern, however small, that an adult working in or on behalf of the school may have acted inconsistently with the staff Code of Conduct but the behaviour does not meet the threshold for an allegation.

Examples include:

- Being overly familiar with children or showing favouritism.
- Taking photographs of children on a personal device.
- Meeting a child alone in a secluded area or behind a closed door without an appropriate reason.
- Using inappropriate, sexualised, intimidating or offensive language.

Low-level concerns may arise from thoughtless or inappropriate behaviour through conduct that could potentially enable abuse. **All concerns must be reported, recorded and addressed appropriately** to protect children and staff.

19.1 Clarity Around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation:
Behaviour indicating that an adult who works with children has behaved in a way that has harmed, or may have harmed, a child; has possibly committed a criminal offence against or related to a child; or has behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

Low-level concern:
Any concern - No matter how small, even if no more than a 'nagging doubt' that an adult may have acted in a manner that is not consistent with the school's code of conduct and/or relates to their conduct outside work which, even if not linked to a particular act or omission, has caused a sense of unease about their suitability to work with children.

Appropriate conduct:
Behaviour that is entirely consistent with the school's code of conduct and with the law.

20. Working with Parents and External Agencies

Partnership with parents/carers

The school normally works openly with parents, but staff must consult the DSL before contacting parents about a concern. The DSL may delay or withhold notification if it could increase risk, compromise evidence, prompt flight or conflict with Police or PSWO advice, and records why. Allegations about parents are managed by the DSL. Safeguarding complaints follow the complaints procedure but never delay protection.

20.1 Information sharing

Information is shared with agencies when it is in the child's best interests.

20.2 Consent and confidentiality

Consent supports routine wellbeing services but is not needed before necessary safeguarding action or lawful sharing to protect a child.

20.3 Referrals

The DSL makes factual, timely referrals to the PSWO, Police, health or specialist services and confirmation records. Where a crime may have been committed, the School Director reports it to the Police Child and Family Protection Unit.

20.4 Multi-agency working

Case conferences agree on a lead professional, outcomes, actions, deadlines, review date, communication plan and contingency, involving the child and where safe, parents.

20.5 Police and emergency services

Emergency: 999 or 112. The Police safeguarding liaison is the CFPU. The school preserves evidence and follows Police instructions.

20.6 Health and other professional services

The School Nurse and School Counsellor arrange medical, forensic and mental-health support, using the directory in the Appendix 5.

20.7 Supporting children and families

The school supports children who have been harmed, with outside agencies where needed and adjusts education support through the case plan.

21. Safer Recruitment and Staff Conduct

- See: 'Recruitment Policy' and 'Staff Code of Conduct'

21.1 Safer recruitment principles

Recruitment is designed to deter, reject or identify people who may pose a risk to children. Panels are trained annually in safer recruitment, including safeguarding and boundary questions, record conflicts of interest and document risk decisions where information is incomplete. No one works unsupervised with children until checks are complete. The full checklist can be found in the Recruitment Policy - 9.

21.2 Pre-employment checks

Checks include scrutiny of applications and employment gaps, identity and right to work, Police clearance, child-protection and online checks. Volunteers, contractors and other adults receive role-appropriate checks

21.3 International/overseas checks

Police, Interpol and overseas checks are sought for countries of residence and employment. Staff remain alert to false documents, identity substitution and incomplete overseas records.

21.4 References and qualifications

References addressing suitability to work with children are obtained and verified, as are qualifications and professional registration.

21.5 Single Central Record

The school keeps a controlled record of all employees and volunteers showing each check, date, evidence, outcome and decision maker and why any check was not required.

21.6 Staff Code of Conduct

Staff must disclose any investigation, conviction, sanction or circumstance affecting their suitability; periodic declarations and repeat checks are carried out where required. Staff report any situation that could be misunderstood and may self-refer without automatic disciplinary consequence.

21.7 Professional boundaries

Adults do not use personal messaging or social-media relationships with Students, take unauthorised photographs, give gifts, show favouritism, use humiliating language or make unnecessary physical contact. Staff avoid being alone with a child; where necessary, they use a visible location when other adults are nearby.

21.8 Appropriate physical contact

Physical contact must be necessary, professional, culturally sensitive and appropriate - for example modelling in music, coaching, appropriate comfort, or restraint to prevent harm. If in doubt, staff ask. Physical intervention is used only when lawful, necessary and proportionate, and is recorded and reviewed. Intimate care follows agreed plans and preserves dignity.

22. Monitoring, Evaluation and Quality Assurance

22.1 Safeguarding audits

The DSL audits cases, response times, referral outcomes, recruitment assurance, training competence, online-safety testing and completion of improvement actions.

22.2 Case monitoring

Cases are reviewed at agreed dates under Section 5.8 and closed only after risk and needs are reassessed.

22.3 Safeguarding trends and patterns

The Committee reviews anonymised trends; the DSL provides an annual report with quantitative data.

22.4 Attendance and behaviour data

Attendance and behaviour data are reviewed through a safeguarding lens by the Head of Primary/Secondary and the DSL.

22.5 Pupil voice

Surveys, focus groups and councils test how safe Students feel and whether they can use the reporting routes.

22.6 Parent feedback

Parent feedback and safeguarding complaints are considered in monitoring.

22.7 Staff feedback

Reporting drills and knowledge checks show whether staff can use the procedures.

22.8 Learning from incidents

Lessons from incidents, complaints and patterns feed into improvement plans; the Board may commission independent review after a serious incident.

APPENDICES:

Appendix 1:
Role and Responsibilities of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL)

- Ensuring that this policy and its procedures are fully implemented.
- Ensuring that they are suitable, qualified and up to date with internationally recognised procedures and practice.
- Ensuring that Safeguarding Committee members are suitable, qualified and up to date with internationally recognised procedures and practice.
- Ensuring that they are given significant prominence in the school community.
- Ensuring that the DSL Team has a section on the website and this information remains updated.
- Ensuring that safe staff recruitment guidance is followed and that adequate staff checks and records are maintained.
- Chairing and minuting regular meetings of the Safeguarding Committee, at least once per term (if appointed Chair).
- Providing a written annual report with quantitative data on child protection matters within the school to the School Director.
- Understanding the filtering and monitoring systems the school has in place and the kinds of websites students are visiting.
- Reporting to the School Director where a crime may have been committed, or where a matter cannot be dealt with in-house, so the relevant authorities may be informed.

Appendix 2:
Low-Level Concern Form

Please use this form to report any concern, no matter how small, that may affect or compromise the safety and wellbeing of a child.

Field	Record
Person whose conduct caused concern:	
Date time place and context:	
Factual description and source:	
Children or adults present:	
Immediate action taken:	
Management or referral action:	
Follow-up and review date:	
Signature and date:	

Appendix 3:
Procedure for Reporting Device-Related Safeguarding Concerns

Scope

This procedure applies when device misuse raises a safeguarding concern. This includes indecent images of Students, cyberbullying and non-consensual sharing of images, including AI-generated or "deepfake" imagery.

Immediate action

Staff should ensure the Students involved are safe and supported. They should confiscate the device, switch it off or set it to flight mode, and hand it to the DSL or store it securely. They must then inform the Designated Safeguarding Lead immediately.

Staff must not

Staff must not view, open, copy, screenshot, forward, save or delete any suspected indecent image. They must not ask a pupil to show, send or delete an image. They must not discuss the matter with anyone except the DSL and must not contact parents before speaking to the DSL. Any accidental viewing must be reported to the DSL.

Cyberbullying evidence

Where the content is not indecent, staff may take screenshots showing dates, times and usernames and pass them to the DSL. Evidence must not be kept on personal devices.

Recording

Staff must record the concern on CPOMS. The record should be factual, include the pupil's own words and the actions taken and must not describe any image.

DSL responsibilities

The DSL will assess the risk and support the Students involved. The DSL decides whether external referral is needed and when parents are informed. The DSL also arranges ongoing support and keeps secure records of all actions and decisions.

Sanctions

Action under the Behaviour Policy follows only once safeguarding needs are met.

|Appendix 4: Safeguarding Reporting Flowchart (All Staff)

Recognise
Notice a disclosure, observation, injury, behaviour, absence, online alert, allegation or pattern. Do not wait for proof.

▼

Make safe
Address immediate medical or physical danger and supervise the child.

▼

Respond
Listen, reassure, use open prompts, explain information sharing and do not investigate.

▼

Record
Make a factual, timed record using exact words in CPOMS.

▼

Report
Notify the DSL or DDSL immediately and make direct verbal contact for urgent cases. Concerns about staff go to the School Director either in person or through the Google Form.

▼

Escalate
If leaders are unavailable, conflicted or inactive and risk remains, contact Police, Sauti 116, the CFPU or the PSWO directly.

▼

Continue support
Follow the safety plan, preserve privacy and report new information immediately.

Immediate danger:

1) Uganda Police 999 or 112.
2) Child helpline: Sauti 116.
3) Never delay emergency action while trying to locate a school leader.

Appendix 5 : Contact Details of Additional External Support Professionals

Name	Position	Contact	Additional Information
SP. Nakigudde Rehema	CFPU officer	0775-630859	Uganda Police, Kira Road Police Station-Bukoto
SP. Nabukera Diana	Child Protection Officer	0783-344739	Police Headquarters , Naguru
Dr. Femke Bannink	Clinical and Educational Psychologist	0312-256001/2/3 info@psychologypractice.org	The Surgery-Naguru
Dr. Ojiambo Deborah	Child Psychologist and Family counselor	0779329242 / 0783009606	Director Safe haven Child and Family Counseling Center-Ntinda
Sauti Uganda	Child Helpline	116 Toll Free Line	Under Min. of Gender and Labour Affairs
Dr. Conrad Ntaate	Family Doctor / Physician		The Surgery Hospital, Naguru 0772-756003
Janet Katana	Counseling Psychologist	0782740522 / 0770700944	Safe Places Uganda- Rehab Center
Kakooza Joseph Sande	LC1 Chairperson Kyebando Kisalosalo Zone	0772-491023	

Appendix 6: Parent/Guardian Summary

SAFEGUARDING AT KISU FOR PARENTS/GUARDIANS:

Every child has a right to feel safe at school, at home, on journeys and online. This guide explains what to notice, how to share a concern and what KISU says it will do. This document summarises the Safeguarding and Child Protection Policy (Policy Number: 17) for parents/guardians. For more information, please review the full policy, this can be found on the KISU website.

Here are some key acronyms that will be useful whilst reading this summary:

Acronym	Full definition
CFPU	Child and Family Protection Unit (Uganda Police)
DSL	Designated Safeguarding Lead
DDSL	Deputy Designated Safeguarding Lead
KISU	Kampala International School Uganda
SEND	Special Educational Needs and Disabilities

KISU Safeguarding/Child Protection Team			
Role:	**Name:**	**Section:**	**Contact:**
School Director	Mr Daniel Grimshawe	Whole School	schooldirector@kisu.com
DSL (Primary)	Ms Caroline Akinyi	Primary	deputy.hop@kisu.com
DSL (Secondary)	Ms Natalie Coley	Secondary	n.coley@kisu.com
Deputy DSL (Primary)	Ms Annabelle Mutesi	Primary	counsellor@kisu.com
Deputy DSL (Secondary	Mr Robert Buga	Secondary	r.buga@kisu.com

What Safeguarding Covers:

Safeguarding means preventing and responding to harm. This includes physical and emotional harm, sexual abuse, neglect, bullying and discrimination, exploitation, and risks online. Harm may come from an adult or another child, within or outside school.

Children may show distress through changes in sleep, mood, friendships, attendance, behaviour or use of devices. A sign alone does not prove abuse. Take a child's account seriously, even if there are no visible signs.

How Parents Can Help?

- Make time for calm conversations. Ask what feels safe or uncomfortable at school, on transport, in activities and online.
- Teach children that they can say no to unwanted touch, tell a trusted adult, and keep telling until somebody helps.
- Agree age-appropriate device rules, privacy settings and a plan for unwanted contact or threatening messages. Do not blame a child for asking for help.
- Tell the school about attendance changes, worries about a peer or adult, or concerns about a child's care, including emotional needs.

When a Child Tells You Something Worrying:

Listen calmly. Thank them for telling you. Say that what happened is not their fault. Let them speak in their own words; Avoid repeated or leading questions and do not ask them to produce a written account. Explain that you may need to share the concern with people who can help keep them safe.

Do not:

- Promise secrecy.
- Confront the person named.
- Investigate the incident yourself or circulate sensitive messages or images.
- In particular, do not forward sexual images of children.

How to Raise a Concern With KISU:

Contact the Designated Safeguarding Lead (DSL) or Deputy DSL (DDSL) promptly using the contact details on the first page. If you are unable to contact the DSL/DDSL, speak to any member of KISU staff and ask them to put you in touch with the DSL/DDSL.

You do not need to have proof or be certain that something is wrong to raise a concern. If you believe a child is at immediate risk of harm, make this clear when you report your concern.

If the concern involves a member of staff or another adult working with the school, contact the School Director. If it involves the School Director, contact the Chair of the Advisory Board through the school's published route. If you cannot safely use the internal route, or urgent risk remains without action, contact Police, Sauti 116 or the relevant Probation and Social Welfare Officer directly.

What Happens After You Report:

The DSL/DDSL will assess the child's immediate safety, record the concern securely using the school's approved safeguarding software, consider the child's views and decide whether additional support, a safety plan or a referral to an outside agency is needed. The school may work with health services, the Police or a Probation and Social Welfare Officer, and will review the plan as the child's needs change.

KISU normally works openly with parents/guardians. The DSL/DDSL may delay telling a parent/guardian if doing so could put a child or someone else at risk or interfere with an investigation. Safeguarding information is shared only with people who need it to protect a child. Routine consent for wellbeing support does not prevent the school from taking necessary safeguarding action when a child may be at risk of harm.

Urgent Help:

If a child is in immediate danger, call Uganda Police on 999 or 112. Sauti, the national child helpline, can be contacted via 116. Seek urgent medical help if needed. If it is an emergency, do not wait for a response from the school before taking action.

NB: *This summary document should always be viewed in conjunction with the school's full Safeguarding and Child Protection Policy (Policy Number: 17).*

Appendix 6.1: Student Summary

SAFEGUARDING AT KISU FOR CHILDREN/YOUNG PEOPLE

You have the right to feel safe, listened to and respected. This guide explains when you might need to ask for help and what adults at KISU should do. Whether you are in Primary or Secondary, you can use this guide. If you would like help, you can ask a trusted adult to read it with you.

Here are some key acronyms that will be useful whilst reading this summary:

Acronym	Full definition
CFPU	Child and Family Protection Unit (Uganda Police)
DSL	Designated Safeguarding Lead
DDSL	Deputy Designated Safeguarding Lead
KISU	Kampala International School Uganda
SEND	Special Educational Needs and Disabilities

KISU Safeguarding/Child Protection Team			
Role:	**Name:**	**Section:**	**Contact:**
School Director	Mr Daniel Grimshawe	Whole School	schooldirector@kisu.com
DSL (Primary)	Ms Caroline Akinyi	Primary	deputy.hop@kisu.com
DSL (Secondary)	Ms Natalie Coley	Secondary	n.coley@kisu.com
Deputy DSL (Primary)	Ms Annabelle Mutesi	Primary	counsellor@kisu.com
Deputy DSL (Secondary	Mr Robert Buga	Secondary	r.buga@kisu.com

What Does Feeling Safe Mean?

Adults and other children should treat you with respect at school, at home, during transport and activities, and online. You can tell someone if you feel frightened, threatened, left out, pressured, hurt, or uncomfortable. You can also speak up when you are worried about a friend.

Your body belongs to you. Someone touching you in a way that feels wrong, asking you to keep an unsafe secret, or pressuring you to send pictures is a reason to tell an adult. Bullying, cruel messages and discrimination are also reasons to ask for help.

Who Can I Tell?

Tell a trusted teacher, the School Counsellor, the Nurse, the DSL or DDSL (See the table of contacts above). You can also tell a parent or guardian if that feels safe. If the first person cannot help, tell another adult. You can speak, write or draw in your own way, and ask for language or communication support.

You do not need to be sure whether something is 'serious enough'. You can say: "*Something happened and I need help,"* or *"I do not feel safe going back there."*

If Something Happens Online:

Stop replying if someone is pressuring or threatening you. Tell a trusted adult as soon as you can. You will not be blamed for asking for help, including if you already replied or sent something.

Do not forward a private or sexual picture of a child to anybody. An adult can help protect you and decide how to report it safely. Let them know if someone threatens to share an image or knows where to find you.

What Will Adults Do When I Tell Them?

They should listen, take you seriously and help you get safe. They may ask a small number of questions so they understand what you need right now. You do not have to keep retelling your story to every adult or write it down for them.

They cannot promise to keep what you tell them a secret. They will tell the Safeguarding Team and, when needed, other people who can protect you. They should explain what happens next in a way you can understand and listen to what you want, even if adults must sometimes make a safety decision.

If Another Child or an Adult Causes Harm:

It is okay to tell, even if the person is popular, older, works at school or says you will get in trouble. KISU says it will take harm between children seriously and plan how to keep everyone safe. You can tell the School Director about a school adult. If the worry is about the School Director, you should ask a trusted adult to contact the Chair of the Advisory Board.

If you do not feel heard, keep telling another trusted adult. You can also ask an adult you trust to help you contact Sauti (The national child helpline) by calling: 116.

When You Need Help Right Away:

Go to a safe adult nearby and say clearly: “I need help now.” If you are in immediate danger, ask an adult to call Uganda Police on 999 or 112. You or an adult can call Sauti (The national child helpline) by calling 116.

Reminder: *This is a summary document. The school has a comprehensive ‘Safeguarding and Child Protection Policy’ (Policy Number: 17). For more guidance or help, please speak to parent/guardian or trusted adult.*

Appendix 7: Staff Code of Conduct

STAFF CODE OF CONDUCT

1. Purpose:

The KISU Staff Code of Conduct sets out the professional standards expected of all adults working at Kampala International School Uganda (KISU).

The Code applies to all staff, including teachers, support staff, school leaders, coaches, volunteers, temporary staff and other adults working on behalf of the school.

The Code should be read alongside your contract, KISU's Safeguarding/Child Protection, Health and Safety, Data Protection and other relevant policies and procedures.

All staff are expected to use professional judgement and to act in the best interests of students at all times.

2. Professional Standards:

All staff are expected to:

- Act with honesty, integrity and professionalism.
- Treat students, colleagues, parents, visitors and other members of the community with dignity and respect.
- Model the behaviour, attitudes and values expected of our students.
- Follow KISU policies, procedures and reasonable instructions.
- Take responsibility for their actions and raise concerns when something is unsafe, inappropriate or inconsistent with school expectations.
- Maintain appropriate professional standards both on and off the school site when representing KISU.
- Be punctual, reliable and appropriately prepared for their professional responsibilities.

Staff should maintain professional relationships with colleagues and address disagreements respectfully and through appropriate channels. Staff should not undermine, intimidate, bully or harass colleagues or encourage students to do so.

3. Safeguarding and Professional Boundaries

The safety and wellbeing of students is everyone's responsibility.

Staff must:

- Follow KISU's ‘Safeguarding & Child Protection; Policy.
- Listen to students and take their concerns seriously.
- Never promise a student that information will be kept secret.
- Maintain appropriate professional boundaries with students.
- Ensure that their interactions with students could not reasonably be considered inappropriate, overly personal or exploitative.
- Use appropriate supervision and professional judgement when working with students on their own.
- Use school-approved systems and communication channels when communicating with students.
- Follow KISU procedures when transporting, photographing, recording or communicating with students.

Staff must never:

- Use physical punishment or humiliating treatment.
- Engage in sexual, romantic or otherwise inappropriate relationships with students.
- Behave in a way that could reasonably be interpreted as grooming, favouritism or inappropriate personal involvement with a student.
- Ignore, minimise or investigate a safeguarding concern themselves.
- Use inappropriate, threatening, discriminatory, sexualised or degrading language or behaviour towards a student.
- Arrange inappropriate private meetings or activities with students outside their professional role.

Where a staff member is unsure whether a situation or relationship is appropriate, they should seek guidance from their line manager or a member of the Safeguarding Team.

4. Respect, Inclusion and Professional Relationships

KISU expects all staff to contribute to a respectful and inclusive school community.

Staff must not bully, harass, discriminate against or victimise another person on the basis of their personal characteristics or circumstances.

Staff should:

- Respect different backgrounds, beliefs, perspectives and experiences.
- Use appropriate and professional language.
- Challenge inappropriate behaviour where it is safe and appropriate to do so.
- Resolve disagreements professionally.
- Avoid gossip, malicious rumours and behaviour that could damage the reputation or wellbeing of others.

5. Communication, Technology and Social Media

Staff are responsible for ensuring that their communication and use of technology reflect professional standards.

Staff must:

- Communicate with students and parents professionally and through appropriate school-approved channels.
- Protect their passwords and access to school systems.
- Keep confidential information secure.
- Use social media responsibly and understand that online behaviour can affect professional relationships and the reputation of KISU.
- Follow KISU expectations regarding photographs, videos and the sharing of information about students.
- Use artificial intelligence and other digital tools responsibly and in accordance with school requirements.

Staff must not share confidential or personally identifiable student, family or staff information through personal accounts, social media or unauthorised digital platforms.

6. Confidentiality and Information

Staff may have access to sensitive information about students, families and colleagues. This information must be treated respectfully and only accessed, used or shared for legitimate professional purposes.

Confidential information must not be discussed inappropriately or shared with people who do not have a legitimate reason to receive it. Where staff are unsure whether information can be shared, they should seek guidance from their line manager or the appropriate member of the Senior Leadership Team.

7. Personal Conduct and Conflicts of Interest

Staff are expected to maintain appropriate personal and professional conduct.

***Staff must*:**

- Not attend work or school activities under the influence of alcohol or illegal drugs.
- Declare any actual or potential conflict of interest that could affect their professional responsibilities.
- Not use their position at KISU for personal, financial or other inappropriate benefit.
- Follow school procedures relating to gifts, hospitality, private tutoring and outside employment.
- Inform the school of any matter that may affect their suitability to work with children, where required by KISU policy or applicable law.

8. Health, Safety and Well-being

All staff have a responsibility to contribute to a safe, healthy and supportive environment for students, colleagues and the wider KISU community.

Staff must:

- Follow KISU's 'Health and Safety' policy, procedures, SOPs and reasonable instructions.
- Take reasonable care of their own health and safety and that of others who may be affected by their actions.
- Report hazards, accidents, injuries, unsafe behaviour or other concerns promptly through the appropriate school channels.
- Take appropriate action in an emergency and follow school emergency procedures (outlined in the Emergency/Lockdown Policy).
- Contribute to a positive working environment by treating others with respect and supporting the wellbeing of colleagues and students.
- Not engage in behaviour that could place themselves or others at unnecessary risk.

9. Raising Concerns

- All staff have a responsibility to speak up when they become aware of behaviour that may place a student or another member of the community at risk.
- Concerns should be reported to the staff member's line manager. Safeguarding concerns must be reported immediately in accordance with the school's Safeguarding and Child Protection Policy.
- Staff who raise genuine concerns in good faith should not be subject to retaliation or victimisation.
- If a concern involves a member of the Safeguarding Team or Senior Leadership Team, the concern should be reported to the School Director.
- If the concern involves the School Director, staff should report this concern to the Chair of the Advisory Board.
- Staff may raise concerns about serious wrongdoing, misconduct, malpractice or other matters that they reasonably believe may have a significant impact on students, staff or the school. Such concerns should normally be raised in writing with the School Director. If the concern involves the School Director, it should be raised with the Chair of the Advisory Board. Staff may raise concerns confidentially and, where appropriate, may do so anonymously. All genuine concerns raised in good faith will be taken seriously and will be handled as sensitively and confidentially as possible.

10. Breaches of the Code

KISU will take breaches of this Code seriously. Where concerns are raised, the school will respond appropriately and fairly, in accordance with relevant school policies and employment procedures.

Serious breaches, particularly those involving safeguarding, abuse, harassment, dishonesty or serious misconduct, may result in disciplinary action and, where appropriate, referral to relevant authorities.

All staff are expected to cooperate fully with appropriate investigations.

11. Staff Acknowledgement

- All staff are required to read and understand this Code of Conduct and to follow the standards it sets out.
- Staff should seek clarification from their line manager or an appropriate member of the Senior Leadership Team if they are unsure about any aspect of the Code.

Glossary

CCE	Child Criminal Exploitation
CFPU	Child and Family Protection Unit (Uganda Police)
CIS	Council of International Schools
CPOMS	Child Protection Online Monitoring System
DSL	Designated Safeguarding Lead
DDSL	Deputy Designated Safeguarding Lead
CSE	Child Sexual Exploitation
FGM	Female Genital Mutilation
GBV	Gender-Based Violence
KISU	Kampala International School Uganda
RSHE	Relationships, Sex and Health Education
SEND	Special Educational Needs and Disabilities
UCHL	Uganda Child Helpline ('Sauti', toll-free 116)
UNCRC	United Nations Convention on the Rights of the Child
Early Help	The provision of support as soon as additional needs and support emerge, or are identified, at any point in a child's life
Protected Characteristics	Personal traits, characteristics and/or beliefs defined by applicable law as protected from discrimination and/or harassment