SAFEGUARDING AND CHILD PROTECTION POLICY

Reviewed:	August 2026
Next Review Due:	July 2027
Applies To:	All members of 7Hills community
Owner:	Head of School
Approved By:	Board of Directors

Mission, Vision and Values

Mission
To inspire our children to reach their full potential by fostering curiosity and an interest in learning, awakening their minds and illuminating their world.

Vision
To create an affordable international secondary school with a high standard of education where children learn through practical and project-based work. To develop our students' moral and intellectual capacity, and to encourage creativity and adaptability.

Aim
An education that is broad, balanced and challenging, with an emphasis on developing strong connections to our host country, Uganda.

Values
Desire for lifelong learning; an ability to adapt; be innovative and reflective thinkers; open minded, and empathetic while achieving high academic success according to individual potential

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1. Commitment Statement

7Hills International School (7Hills) is located in Kololo, Kampala, Uganda. The school was founded in 2017 to provide a high quality, international education to young people. We have a mission to inspire our children to reach their full potential by fostering curiosity and an interest in learning, awakening their minds and illuminating their world. We have a vision to educate children, regardless of their religious, social or economic background and it recognizes and acknowledges the need to protect all children from all forms of abuse as stated in line with the United Nations Convention on the Rights of the Child (1990) and The Children's Act Uganda Chapter 59 (1997 Laws of Uganda).

We are opposed to all forms of abuse suffered by children and we seek to ensure that through its work, there is commitment to its policies, practices and procedures, that are consistent with the best interests of the child and the safeguarding of all children at all times.

Child safeguarding is both an organisational and an individual responsibility. Therefore, it is crucial that everyone connected with 7Hills (i.e., staff, volunteers, board members) understand the issue of child abuse and their own role and responsibilities in preventing abuse and protecting children.

2. Scope and Purpose

7Hills International School recognises its responsibilities for child protection. This policy applies to all staff, board members and volunteers working within the school. There are two main elements to this policy:

- **Prevention** - which includes provision for child protection through recruitment and screening of staff and implementation of child protection measures.
- **Intervention** - which in includes the procedure to follow when there is any suspicion of child abuse or neglect.

3. Definitions

Definition of a child - According to the Constitution of Uganda, a "child" is defined by every human being below the age of 18. This policy adopts this operational definition of a child in all provisions and interpretations. This policy extends to all 7Hills students, including those who are over the age of 18 whilst enrolled.

Definition of Safeguarding - A broad term that refers to all actions taken to protect children from harm, promote their welfare, and ensure their physical, social, emotional, and psychological development is not impaired. Child protection is a key part of safeguarding.

Definition of Abuse - According to the World Health Organization, "child abuse" or "maltreatment" constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

3.1 Types of Abuse

Physical abuse - Results in actual or potential harm from an interaction or lack of interaction, which is reasonably within the control of a person in a position of responsibility, power or trust. There may be single or repeated incidents.

Emotional abuse - Includes the failure to provide a developmentally appropriate supportive environment, including the availability of a primary attachment figure, so that the child can develop a stable and full range of competencies. This can be caused by persistent or severe emotional ill treatment such as threatening, discriminating, ridiculing, rejecting, belittling, or other forms of hostility.

Sexual abuse - The involvement of a dependent, developmentally immature children and adolescents in sexual activities they do not truly comprehend, to which they are unable to give informed consent to, or that violate the laws or social taboos of society.

Neglect - The inattention or omission on the part of a caregiver to provide for the development of the child in all spheres such as health, education, emotional development, nutrition, shelter and safe living conditions. This includes the failure to properly protect children from harm as much as feasible.

Exploitation - Refers to the use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labor and child prostitution.

4. Grave Concern / At Risk

This is not a separate category of child abuse but covers a number of situations where a child may be at risk of abuse. Grave concern may be felt when a child shows symptoms of stress and distress, or whose home circumstances present as high-risk for abuse (i.e. parents abuse drugs/alcohol; another child in the home has been abused; an adult in the family has a history of violent behavior, etc.)

*See Appendix 2 for Indicators of Child Abuse pertaining to each of the types of abuse listed above.

4.1 Specific Scenarios of Child Abuse

- **Corporal Punishment** – physical punishment in the use of a physical force intended to cause pain for discipline, correction and control.
- **Child Pornography** – the viewing, use, trade, and transference of abusive sexual images of children engaged in explicit sexual activity or showing their private parts for the purpose of sexual gratification. This can include Youth-Generated Imagery (“nudes”)
- **Traditional Harmful Practices** – cultural practices that may put the child in harm (i.e. child marriage, female genital mutilation/cutting (FGM)).
- **Child-on-Child Abuse** – a child experiences deliberate hostility from a peer. It can be in the form of physical intimidation, verbal intimidation, or emotional intimidation.
- **Spiritual Abuse** – when someone in a position of spiritual authority misuses his or her power with the intention of controlling, coercing, manipulating or dominating a child.
- **Witchcraft/Ritualistic Abuse** – Children may be abused through ritualistic practices and ceremonies in the form of beating, maiming, rape, or as a sacrifice.

5. Prevention & Safeguarding Culture

7Hills provides child protection and safeguarding by implementing a series of measures.

5.1 Safer Recruitment

7Hills International School is committed to ensuring that all individuals working with students are suitable, safe, and aligned with the school's safeguarding culture. Safer recruitment is a critical component of our wider safeguarding framework and is applied consistently across all appointments.

The school follows a rigorous and transparent recruitment process designed to deter, identify, and reject unsuitable candidates, while ensuring that all staff and volunteers are appropriately vetted before working with students.

All recruitment at 7Hills is underpinned by the following principles:

- The welfare of the child is the paramount consideration in all recruitment decisions
- Recruitment processes are fair, consistent, and well-documented
- Appropriate pre-employment checks are completed prior to confirmation of appointment
- Staff involved in recruitment understand their responsibilities in maintaining safeguarding standards

The school ensures that:

- All roles include clear safeguarding responsibilities within job descriptions
- Candidates are assessed not only on qualifications and experience, but also on their values, attitudes, and suitability to work with children
- Gaps in employment history and any concerns are explored during the recruitment process
- References are obtained and verified prior to confirming an appointment
- All offers of employment are conditional upon satisfactory completion of required checks
- A Single Central Record (SCR) is maintained, documenting all recruitment and vetting checks

Safer recruitment procedures apply to all individuals working at or on behalf of the school, including:

- Teaching and non-teaching staff
- Leadership positions
- Volunteers and interns
- Contractors and external providers

All new staff are required to complete a safeguarding induction before beginning work with students, and ongoing monitoring ensures continued suitability for their role.

Full details of recruitment procedures, including application processes, interview requirements, pre-employment checks, and record-keeping expectations, are outlined in the school's Safer Recruitment Policy and Procedures.

5.2 Management Level

- We have a Designated Safeguarding Lead (DSL) and designated deputies for safeguarding and child protection who have received appropriate training and support for this role and will receive ongoing training.
- Safeguarding and child protection meetings are held regularly.
- Organise mandatory training sessions for all staff, which include training on recognising indicators of abuse, the reporting procedure, and digital safeguarding**.**
- A member of the 7Hills board of governors has been designated as Link Governor for safeguarding.
- Ensure parents understand the responsibility placed on the school and staff for child protection by setting out its obligations in the school prospectus. The Safeguarding & Child Protection Policy for Parents and Guardians is published and shared with all parents and guardians.
- Develop effective links with relevant agencies and cooperate as required with their inquiries regarding child protection matters including attendance at case conferences.
- Ensure safe recruitment practices are always followed.
- Incorporate safeguarding and child protection measures into all planning, assessing, and management procedures.
- Ensure a school ethos which promotes a positive, supportive and secure environment, and gives the student a sense of being valued, which should be incorporated in the content of the school's curriculum.
- Develop effective links with relevant agencies... and maintain an updated list of local authority contacts for child protection and welfare agencies.

5.3 Training and Accountability

In order to ensure the highest standards of safeguarding at 7Hills, we ensure that:

5.3.1 Training Frequency

The training should be tiered to ensure everyone receives the appropriate level of knowledge based on their role.

1. **Mandatory Initial Training (for all new staff) -** This must be completed as part of the induction process before a new employee begins work with students. It ensures every staff member starts their role with a complete understanding of the policy and their responsibilities.
2. **Mandatory Annual Refresher Training (for all staff) -** A whole-school session to be conducted at the beginning of each academic year. This reinforces the key principles, addresses any updates to the policy or local law, and keeps safeguarding at the forefront of everyone's minds.
3. **Specialized Training (for DSL and Safeguarding Team) -** The Designated Safeguarding Lead (DSL) and members of the Safeguarding Team should receive more in-depth, external training

as required. This training should be refreshed every two years and should align with international best practices.

6. Staff Handbook / Code of Conduct

All staff, volunteers, partners, trustees, representatives, board members, and students are required to understand and abide by the following expectations, which outline rules of appropriate and proper behavior when working with children, and extends to behavior outside the workplace. These expectations are designed primarily to protect children; however it also serves to protect representatives from false accusations.

6.1 Do's

- Understand that the adult will always be held responsible
- Be accountable to each other so that any behavior can be challenged for the safety of children
- Ensure that risks of working alone are minimized by ensuring the "two-adult" rule whenever possible, and that you're always visible when working with children.
- Avoid inappropriate dress and be culturally sensitive to the environment
- Respect each child's boundaries and their right to privacy (including taking photographs). Consent to use images should be obtained from the child's parents/guardians. Any photographs taken with personal phones should be shared with the administration team and then must be deleted. Personal information and details of children, which may identify them and increase any potential risk or harm to them, should not be used. Photographs of children must not be shared with external parties.
- Use positive, non-violent behavior to manage children's behavior. (See Stoplight Approach)
- Raise any concerns of inappropriate behavior immediately to the DSL.
- Be aware of the potential for peer abuse.
- Ensure children, when changing for PE or swimming, change with members of the same-sex. An adult of the same-sex should supervise them. The teacher should remain outside the door of the changing room and not enter the room until all children are changed. On any occasion where a staff member needs to enter a bathroom or changing room, they must knock and warn children inside that they intend to enter the room.
- Touch should be age-appropriate and generally initiated by the child. Children have the right to decide how much physical contact they give with others. Typical safe forms of contact that may be given in a public setting:
    - side hug/arm around shoulder;
    - touch on arm, back, head;
    - high-five, fist bump
    - carrying as a result of injury or sickness;
    - demonstrating techniques, e.g. in Drama, PE;
    - shaking hands;
    - medical attention

Inadvisable forms of physical contact are as follows:

- any form of touch that is resisted by the child;

- any form of touch that is initiated due to the needs of the adult, not the needs of the child;
- inappropriate touching of 'off-limits' areas: buttocks, chest, genital areas, thighs;
- kissing

6.2 Don'ts

- Condone or participate in illegal, unsafe or abusive behavior involving children.
- Leave the class unattended. The classroom teacher has primary responsibility for the class under his/her charge. The teacher must not leave the classroom unattended for any reason other than an emergency. In the case of the teacher having a classroom assistant, the assistant may be left but there should be clear indication where the classroom teacher is during his/her absence from the classroom. Parent/Guest speakers/High School student volunteers must never be left on their own in control of the class.
- Hit or otherwise physically assault or physically abuse children in a way that is against the Convention on the Rights of the Child. In the case of breaking up a fight or physically restraining a child who may do harm to himself or others then the teacher is to respond appropriately using the required amount of force. The aim in these situations is to secure a safe environment for the students involved.
- Spend time alone with a child away from others or behind closed doors.
- Meet with a child away from the school without the child's caretaker presence or consent.
- Develop physical or sexual relationships with children or develop relationships that could be deemed exploitative.
- Do things of a personal nature for a child that they could do for themselves.
- Be under the influence of alcohol or drugs prior to assuming responsibility for any child.
- Act in ways that may place a child at risk of abuse by another adult.
- Use language, make suggestions, or offer advice that is inappropriate, offensive, demeaning or abusive.
- Act in ways intended to shame, humiliate, belittle or degrade children.
- Conduct or be a part of harmful traditional practices or spiritual rituals.
- Use inappropriate touch with a child, including; touching any area covered by a swimsuit; kissing; or tickling.
- Expose children to inappropriate materials such as pornographic videos or literature.
- Discriminate against, show different treatment to, or favor particular children while excluding others.
- Establish or maintain contact with students through social media platforms, WhatsApp, etc., or have any communication with students outside of regular school communication channels or at unsociable hours (unless prior approval and safeguarding parameters have been put in place by the school).

These expectations aim to establish an open culture in which any issues or concerns can be discussed. Adults will be held mutually accountable in regard to protecting our children and we will

empower children by informing them of what is acceptable and unacceptable behavior and encouraging them to raise concerns about their safety.

7. Guidelines to Discourage Incidents of Abuse

7Hills implements the following guidelines in regard to our facility to discourage incidents of abuse:

- **Attendance** - all children are accounted for during morning attendance. If a child needs to leave school grounds for any reason, they must check out at the office. Any extended periods of unexplained absence will be investigated by the DSL & Safeguarding team.
- **Controlled Access of Visitors** - Any visitors, including parents, are registered by security, given an identification pass, and report at the reception before continuing on the campus.
- **Open-Door Policy** - All doors will be left open for surveillance purposes whenever a child and adult are in the same room. Rooms/sheds/closets that are not in use will be locked.
- **Monitoring of Campus** - Staff members are designated break and lunch duties where they must circulate the school campus to monitor activities.
- **Washroom Guidelines** - The school has separate male and female washrooms. Staff and students have separate washrooms. Adults and children must go to the washroom of the same sex.
- **Health & Safety** - Staff will ensure furnishings and equipment are safe and do not present overt risk to students. The school will maintain cleanliness throughout the facility, including cleanliness of food prepared on site. All staff are first aid trained. Access to the first aid kit is available to all staff. Any injuries occurring on school property should be recorded by the person attending to the child in an incident form that is sent to the Head of School and Safety Officer (current Operations Manager).
- **Off-Site Procedures** - A risk-assessment must be done in regard to any off-site trips to ensure the safety of students. Consent should be received from each child's caregiver. The "External Agencies Safeguarding and Child Protection Policy" is shared with any guest speakers, field trip hosts, etc.
- **Emergency Procedures** - In the event of an emergency (fire, lock down, etc.), the supervising adults will follow the guidelines within the school's Crisis Management Plan and the instructions of the Head of School, if at school. When away from school, students will gather at a pre-arranged muster point away from the current facility. Attendance should be taken as soon as possible to ensure all students are present and safe.

7.1 Transport

- **School Bus Transport** - Parents must sign up their children for school bus transport, if their children plan to use the school transport (for field trips etc.). Children must have their own seat with a seatbelt. The bus driver must ensure this is enforced. An assistant will also be assigned to each bus. A safety inspection on the vehicle must be completed each term and submitted to the management of the school.
- **Transportation to and from school** - All students must be dropped off at and collected by a designated driver(s) whose identification is known to the school. Students will not be permitted

to leave school at the end of the day with an unknown driver, or with another student's driver without express written permission from the parent/guardian. Students are not permitted to use "boda-boda" motorbike taxis without express written permission from the parent/guardian. Students who use "boda-boda" motorbike taxis must wear a safety helmet in accordance with Ugandan law.

8. Student Empowerment

We recognize that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behavior may be challenging and defiant or they may be withdrawn.

As a result, 7Hills is committed to supporting and empowering students via

- **Curriculum** - The school's curriculum (inc. PSHE) will include content on personal safety, healthy relationships, and a student's right to feel safe, in age-appropriate ways.
- **Awareness** - The school will actively inform students about what is acceptable and unacceptable behaviour from both adults and peers.
- **Reporting** - The school will provide clear and accessible ways for students to report concerns, including through a trusted adult, the school counsellor, or an anonymous reporting system, which will be regularly communicated to all students.
- **School Values** - The school ethos which promotes a positive, supportive and secure environment and gives students a sense of being valued.
- **Behaviour** - The school's behaviour policy is designed to support vulnerable students. It emphasises that while certain behaviours may be unacceptable, the student remains valued and is not to be blamed for any abuse they have experienced.

9. Digital Safeguarding

As electronic devices and online presence play an increasingly more significant role in the lives of our community members, the following guidelines are in place:

- **Online Communication** - All communication with students must be conducted through approved school channels and at reasonable hours. Staff are not to engage in personal or private conversations with students via social media, WhatsApp, or any other external platform.
- **Safe Technology Use** - The school will provide clear guidelines for the acceptable use of school technology and the internet. This includes prohibiting access to inappropriate content and ensuring that all online interactions are monitored.
- **Cyberbullying** - The school has a zero-tolerance policy for cyberbullying. All incidents must be reported immediately to the DSL and will be handled in accordance with the school's anti-bullying policy.
- **Student Data Privacy** - All personal information and images of children must be stored securely. Photographs taken on personal devices for school-related activities must be deleted after they are shared with the administration team.

10. Intervention

7Hills recognises its responsibility to report abuse and the duty to cooperate in the incidence of suspected or reported child abuse. The welfare of the child is the paramount consideration in the process of recognizing abuses, reporting cases and supporting the victims of child abuse.

This section describes the procedure to follow when there is any suspicion of child abuse or neglect. In the Appendix 4 you can find a summary of this procedure.

10.1 Recognising

Every member of the 7Hills community has the duty to be aware of safeguarding concerns and child abuse, to observe and listen to staff and students and being alert to signs of abuse and neglect, such as changes in appearance and behavior.

A suspicion, observation or allegation of child abuse/ neglect must be reported to the DSL immediately. The DSL has received appropriate training and support for the task of child protection.

If the situation turns out not to be a case of abuse, no fault lies with the one who reported. However, if one fails to report, the risk to a child's safety is one's responsibility. It is better to report signals early than to wait for obvious signs when more severe harm has occurred. It is the responsibility of the DSL/s and other authorities to interpret, investigate, and act upon the situation.

If a child makes an allegation, listen without judgment. When outward signs of abuse are apparent, the value of the child is paramount. A child must be encouraged to talk and assured that he/ she is being listened to carefully, without the intention to blame or bring further harm.

DO	DON'T
1) Remain calm; listen with care 2) Let the child know he/ she did the right thing by telling. 3) Let the child know you take the story seriously.	1) Convey doubt in what the child is telling you. This can happen inadvertently if you ask the child to repeat what he/ she has said, which can make the child feel like you are questioning the validity of the story. 2) Ask leading questions. 3) Promise confidentiality but make it clear to the child that the allegation will be passed on.

10.2 Reporting

It is critical that reports are made first-hand by the person who has observed, suspects, or has directly heard an allegation of possible abuse. Fill out the Abuse Report Form (see Appendix 4) or the Google Form to the DSL within 24 hours of the concern arising.

Do not discuss the concern with someone else instead of reporting to the DSL even though this might be done with the good intention of getting input or confirming/ disconfirming your suspicions. Involving

other people prior to making a report or in making a report potentially compromises the information, violates the privacy of the alleged parties, and can cause further harm. The DSL and the members of staff in the chain of reporting are trained in safeguarding and child protection. You will not be judged for making an "unnecessary" report. Rather, the DSL will know what to do with the information you provide.

Once a report is lodged, the DSL and the safeguarding team will then follow the procedure outlined in the Child Safeguarding Reporting Flow Chart (Appendix 5).

10.2.1 Safeguarding Team Meeting

The designated senior person will contact the Safeguarding Team. A meeting will be held as soon as possible. In attendance are the DSL, Head of School, School Counselor, Director of Student Support Services and the adult responsible for the initial report. Wherever possible someone should be in this meeting who is knowledgeable of the language and culture of both the victim and alleged offender. The meeting will address the following issues:

- Is there evidence of the alleged incidents?
- How can the school offer care and protection for the victim?
- What evidence needs to be collected? Statements, photographs, witness testimony, etc.

COMPLETE CONFIDENTIALITY IS OF CRITICAL IMPORTANCE TO THE INVESTIGATION AND INFORMATION WILL BE COMMUNICATED ON A 'NEED TO KNOW' BASIS ONLY.

At the end of this meeting an action plan, including potential liaison with police and legal representatives, will be formulated that looks to the interests of the child, whilst at the same time supporting an 'innocent until proven guilty' ethos with regards to the alleged offender.

10.2.2 Report Formulation

- **Preliminary Report -** Following investigations as per action plan, the DSL is to complete a report of all findings, evidence, testimony, disclosure and confession. Report should be submitted to the Board member responsible for child protection and the Safeguarding Team for approval and to discuss appropriate action.
- **Report to the Authorities** - Following consultation with the school's legal advisor, if appropriate a report is made to the relevant body as required by the law/statute/regulations of Uganda.
- **Review and Final Report** - Following any action taken, a full report is compiled by the DSL detailing findings, actions, authority involvement and conclusion of matter. This report will be approved by the Safeguarding Team and filed. Information will be passed to other staff/family members as appropriate.

10.3 Suspension of Duties

If any member of staff employed by 7Hills is accused of child abuse, the allegation will be treated with the utmost seriousness and responded to immediately. Suspension on full pay may be considered

where necessary, but is not an automatic response. This approach allows the school to protect children, ensure a fair investigation and safeguard the rights of all parties involved.

Where an allegation or concern is made about the conduct of a member of staff, supply teacher, volunteer, contractor or any adult working on behalf of the school, 7Hills will respond promptly, fairly and proportionately.

The welfare, safety and best interests of the child remain the paramount consideration. At the same time, the school recognises its responsibility to ensure that staff are treated with dignity, respect and a presumption of innocence until the investigation outcome is determined.
All allegations will be:

- reported immediately to the Designated Safeguarding Lead and Head of School
- recorded factually and confidentially
- assessed to determine whether they meet a safeguarding threshold
- managed in consultation with relevant authorities where appropriate

10.3.1 Suspension - Principles and Thresholds

Suspension will only be considered where it is:

- the integrity of the school and its operations; or
- formally necessary to protect a child or children from potential harm; or
- required to preserve the integrity of an investigation; or
- In order to ensure recommended by safeguarding authorities or police

Before deciding to suspend a member of staff, the Head of School (or Chair of the Board where appropriate) will consider:

- the nature and seriousness of the allegation
- whether the child is at immediate risk
- whether the staff member's continuing presence may compromise evidence or witnesses
- whether alternative duties or temporary re-deployment could be used instead

Where suspension is implemented, it will be:

- proportionate and time-limited
- confirmed in writing with clear reasons
- reviewed regularly
- accompanied by appropriate pastoral and HR support

Suspension does **not** imply guilt, and no disciplinary action will be taken until the investigation concludes.

10.3.2 Investigation Pathway and Outcomes

Following consultation with the Safeguarding Team and external authorities (where applicable), an allegation may result in one of the following outcomes:

- **Substantiated** - evidence confirms the allegation
- **Unsubstantiated** - insufficient evidence either way
- **Unfounded** - evidence indicates the incident did not occur
- **False** - evidence proves the allegation incorrect
- **Malicious** - deliberately fabricated or intended to cause harm

The school will:

- ensure appropriate support is provided to any child involved
- ensure fair treatment and welfare support for the staff member
- maintain confidentiality on a need-to-know basis
- keep a clear written record of actions and decisions

Where an allegation is substantiated, appropriate action will be taken in accordance with school policy, employment law and safeguarding guidance.

Where an allegation is proven to be malicious, the school may consider whether disciplinary or pastoral action is appropriate for the reporting party, while ensuring child-centred practice remains paramount.

10.4 Low-Level Concerns and Professional Conduct

7Hills promotes a culture of openness, reflective practice and early intervention. The school recognises that concerns about staff conduct do not always meet a safeguarding threshold, but may still require discussion, reflection or monitoring.

A **low-level concern** is any behaviour which:

- is inconsistent with the Staff Code of Conduct, or
- causes a sense of unease, caution or “nagging doubt”, but
- does **not** meet the threshold for a safeguarding allegation or referral

Examples may include (but are not limited to):

- over-familiar behaviour or preferential treatment
- blurred professional boundaries
- unnecessary one-to-one situations in secluded areas
- tone or language that appears inappropriate or unprofessional
- repeated minor conduct concerns which form a pattern over time

Low-level concerns:

- must be reported to the DSL or Head of School
- will be recorded and stored securely
- will be reviewed to identify emerging patterns
- will normally be addressed through supportive professional dialogue

The purpose of recording low-level concerns is to:

- promote staff accountability and reflective practice
- protect students by addressing behaviours early
- protect staff by ensuring transparency
- prevent escalation into more serious concerns

Where repeated or escalating low-level concerns are identified, the case may be reassessed and managed under the formal allegations process.
The existence of this framework does **not** replace:

- the duty to report safeguarding concerns immediately
- the right of any staff member to escalate a concern externally if necessary

Rather, it strengthens a whole-school culture of safe, responsible and professional conduct.

11. Supporting

All allegations and/or suspicions of abuse will be taken seriously by the school and handled with respect for the child's confidentiality. The school offers assistance and support to cope with any trauma that the child(ren) and their families may be experiencing. The school counselor may offer counsel for the victim and their family. The DSL will offer any advice or support needed by staff to fulfill their obligations under this policy.

12. Acknowledgements

This policy and its appendices have been developed with guidance from and reference to:

- UN Convention of Rights of the Child
- Children's Act of Uganda
- World Health Organization
- Stoplight Approach
- Tearfund – Child Protection Policy 2009
- Working Together to Safeguard Children 2024 (UK)
- Keeping Children Safe in Education 2024 (UK)

13. Policy Review and Approval

This policy will be reviewed on an annual basis by the Designated Safeguarding Lead, head of School and the nominated Board Member responsible for child safeguarding. The policy will also be updated in response to any changes in Ugandan law or international best practice.

14. Distribution and Access

This policy is available to all staff, students, and parents via the school website and on the school Google drive. Printed copies can be requested from the school reception.

APPENDIX 1 - Definition of Terms

Child – any person below the age of 18 years, regardless of national laws or cultural practices that may stipulate a younger age. Any child over the age of 18 who is currently enrolled at 7Hills International School is also considered a child for the scope of this policy.

Student – a child who is registered and attending classes at the school.

Teacher/Staff – a person who has been hired by the school with the qualifications and expectation to work with students.

Board Member – an elected member that sits on the Board of 7Hills International School and engages in decision making for the school.

DSL (Designated Safeguarding Lead) – a member of the staff responsible for this policy and its application.

Safeguarding Team – this includes the DSL, School Counsellor, Student Support Representative and the Head of School, who are responsible for maintaining and monitoring the safeguarding and child protection within the school.

Visitor – a person, adult or child, who is on school property for a short duration for a specific purpose (i.e. parents, police etc.).

APPENDIX 2 - Indicators of Child Abuse

Note: Most forms of abuse have a combination of the above indicators and observations and sometimes cannot be put into a specific category.

Type	Physical Observations in Child	Behavioural Observations of a Child
Physical Abuse	Bruising, burns, bite marks, fractures, swelling, serious injuries with no explanation or conflicting explanations, untreated injuries.	Unusually fearful of adults, unnaturally compliant to parents, refusal to discuss injuries, fear of medical help, aggression towards others, covers-up with clothing.
Sexual	Damage to genitalia (as inspected by doctor), anus or mouth, sexually transmitted disease, unexpected pregnancy (especially in very young girls), soreness in genital area, anus or mouth, unexplained recurrent urinary tract infections and discharges or abdominal pain.	Sexual knowledge inappropriate for age, sexualized behaviour in young children, promiscuity, hinting at sexual activity, sudden apparent changes in personality, lack of concentration, restlessness, aimlessness, socially withdrawn, overly compliant behaviour, acting out, aggressive behaviour, poor trust in significant adults, regressive behaviour, wetting day or night, insecure and clinging behaviour, arriving early at school, leaving late, running away, suicide attempts, self-mutilations, self-disgust, eating disorders, hysteria.
Neglect	Poor personal hygiene, dressed inappropriately for the weather, is inadequately supervised or left in the care of an inappropriate care giver, untreated medical problems, malnourished (being undersized, having low weight and a sallow complexion, lacking body tone, being constantly tired), drug or alcohol abuse.	Constant hunger, constant tiredness, frequent lateness or non-attendance at school, destructive tendencies, low self-esteem, neurotic behaviour, no social relationships, running away, compulsive stealing or scavenging.
Emotional	Highly anxious, showing delayed speech, low self-esteem, self-harming behaviour, and drug or alcohol abuse.	Development lags, acceptance of punishment which appears excessive, over-reaction to mistakes, continual self-deprecation, sudden speech disorders, fear of new situations, inappropriate emotional responses to painful situations, neurotic behaviour (such as rocking, hair-twisting, thumb sucking), self-harming or mutilation, fear of parents being contacted, extremes of passivity or aggression, drug/solvent abuse, running away, compulsive stealing.

APPENDIX 3 - Procedure in Case of Suspicion of Child Abuse or Neglect

The duty of every member of the 7Hills community is to be vigilant about child protection. This is the procedure to follow when there is any suspicion of child abuse or neglect.

Recognize	Be aware. Observe. Listen. Be alert to signs of abuse and neglect such as changes in appearance and behaviour.	
	If a child makes an allegation:	
	DO ✓	**DO NOT** ⊘
	- Listen calmly and with composure	- Look shocked, disgusted, or say negative things about the alleged perpetrator
	- If needed, call the DSL	-Call the child a liar or insinuate that they are lying
	- Acknowledge bravery and offer support.	- Question their account, e.g., "How could you let him/her do those things to you?"
	- Reassure them they are not alone and you are there to help.	- Ask, "Why didn't you tell me this before?"
	- Encourage honesty without reacting negatively.	- Use technical or legal terms like "rape", "incest", or "jail".
	- Accept and use the child's own words for describing the incident.	- Suggest what happened or who did it, e.g., "Did you get that bruise because Mommy hit you with a brush?"
	- Use open-ended questions like: "Can you tell me more about that?" or "What happened next?"	- Ask "why" something happened or try to change the child's mind if they try to take their story back/change what they say.
	- Avoid questioning their truthfulness or interrupting.	- Force a child to undress or show their injuries to others.
	- Listen if they are talking, and respect their silence if they are quiet.	- Ask to see any photos on phones etc. of alleged youth-produced or pornographic imagery (nudes/semi-nudes)
	- Explain that some information must be shared to get help and that only those who can help will be informed.	Agree to keep it a secret
	- Answer questions simply and honestly.	- Tell the child to keep any discussions with you a secret.
	- Let them know the next steps, even if it is "I will think about this and let you know the plan".	-Tell them that the person they are talking about "would never do" what they are saying

Report	Fill out the report form or make a written report to the *DSL within 24 hours. Report *directly* to the DSL. Do not involve other parties
Support	Be available to the investigation. Be trustworthy to the victims. COMPLETE CONFIDENTIALITY IS OF CRITICAL IMPORTANCE TO THE INVESTIGATION AND INFORMATION WILL BE COMMUNICATED ON A 'NEED TO KNOW' BASIS ONLY.

* If the DSL is unavailable, follow this chain of reporting: 1) Deputy DSL or 2) Head of School
If your concerns involve the DSL or the person to whom you should be reporting, move on to the next person in the chain of reporting.

APPENDIX 4 – Abuse Report Form

THE INFORMATION IN THIS FORM IS CONFIDENTIAL. IT SHOULD BE SENT ONLY TO THE DSL. IT MUST BE KEPT IN A SECURE PLACE IN ACCORDANCE WITH DATA PROTECTION REGULATIONS.

You should attempt to fill in as much of the form as possible. Leave blank those areas for which you have no knowledge. If you are raising a general concern about behaviour that you have observed then please make this clear. Distinguish between what you know personally or observed and what was told to you by someone else.

PART ONE – DETAILS

Your Details

Your Name	Your Position	Date	Time

Student Details

Student Name	Grade/Class	Gender	Living Arrangements (if known)

Current Situation

Where is the child now?	Is the child safe?	Are there any immediate medical issues?

If there is more than one child involved:

Child's name: _____ Grade: _____

PART TWO – YOUR CONCERN

Type of concern (tick all that apply):

- ☐ Physical Abuse
- ☐ Emotional Abuse
- ☐ Sexual Abuse
- ☐ Neglect
- ☐ Other (specify): _____

Who is the alleged perpetrator?

Was the abuse observed, suspected, or disclosed, and by who?

Nature of concern / allegation (what were the circumstances, what is alleged to have happened):

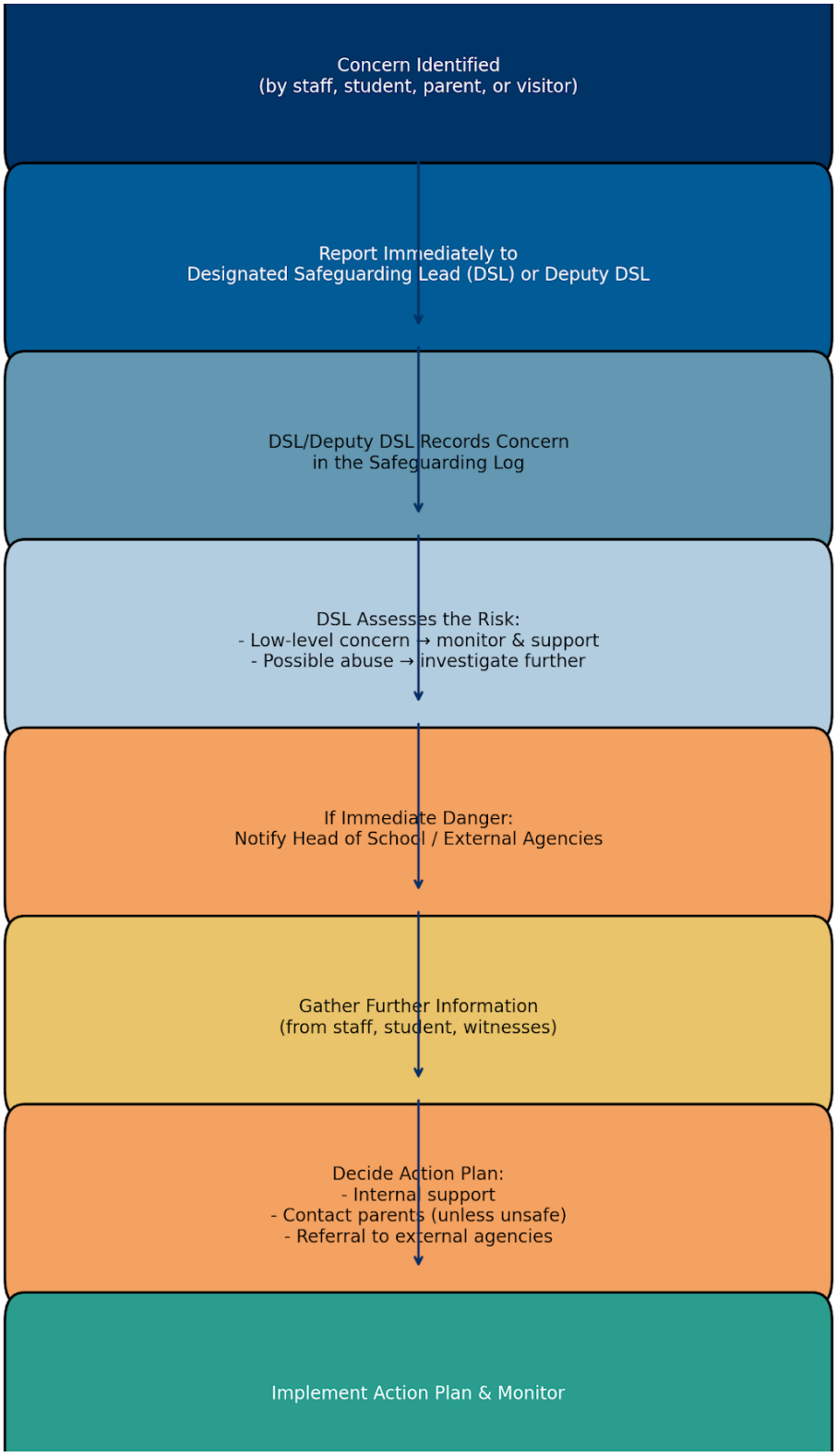
Date(s), time(s), location(s) of incident(s):

Report exactly what the child has said (in his/her words) and what you said:

External agencies contacted (if any) – Date / time, name of person, advice received:

Signed: _____ Date: _____

APPENDIX 5 - Child Safeguarding Reporting Flow Chart



APPENDIX 6 - Annual Staff Compliance Agreement

This agreement confirms that I have read, understood and agree to follow the 7Hills International School policies on:

- **Safeguarding and Child Protection**
- **Staff Handbook / Code of Conduct**
- **Confidentiality**

These policies are designed to ensure the safety and wellbeing of students, maintain the highest professional standards, and protect the privacy of all members of the school community.

1. Safeguarding Commitment

I understand my duty to protect every student from harm. I agree to:

- Follow the 7Hills Safeguarding and Child Protection Policy at all times.
- Report any safeguarding concern immediately to the Designated Safeguarding Lead (DSL) or a Deputy DSL.
- Maintain professional boundaries in all interactions, both in person and online.
- Complete all required safeguarding and child protection training.
- Place the welfare of the child above confidentiality when safety is at risk.

2. Code of Conduct

I commit to upholding the highest standards of professional behaviour. I agree to:

- Treat all members of the school community with respect, fairness, and courtesy.
- Maintain appropriate language, dress, and behaviour in line with school expectations.
- Use school resources responsibly and for authorised purposes only.
- Avoid actions that could bring the school into disrepute.
- Comply with all school policies.

3. Confidentiality

I understand that I may have access to confidential information regarding students, families, and colleagues. I agree to:

- Share confidential information only with authorised staff who have a legitimate need to know.
- Never discuss individual students or staff outside appropriate professional contexts.
- Ensure that confidential discussions take place in private.
- Store all personal data securely and dispose of it according to the 7Hills Confidentiality Policy.
- Respect parents' right to access their own child's records while protecting information about other students.

- Keep any safety or wellbeing information in secure, confidential files, accessible only to relevant staff.

Acknowledgement

By signing this document, I confirm that:

1. I have read the full Child Protection and Safeguarding Policy**,** Staff Handbook (inc. Code of Conduct) and Confidentiality Policy.
2. I understand my responsibilities under each policy.
3. I agree to abide by these policies at all times as a condition of my employment.
4. I understand this agreement will be renewed annually and a signed copy will be kept in my personnel file.

Staff Member:

Name	Signature	Date

Line Manager / DSL:

Name	Signature	Date
Scott Porter (DSL)		