



**Kampala Community  
International School**

# **Health and Safety Policy**

## **Review of Policy**

This policy will be reviewed annually.

Last Review: January 2026

**Policy Owner:** Director of Business Operations

Signed off by Director: *R. Bandora*

Date: 16th January 2026

## **Rationale**

This Health & Safety Policy establishes the governance framework through which Kampala Community International School (KCIS) manages foreseeable risk across premises, supervision systems and high-risk activities.

Kampala Community International School (KCIS) recognises that effective health and safety management is inseparable from safeguarding, supervision and leadership accountability. The school operates within a physical environment characterised by varied topography, open-air architectural features, extensive outdoor activity, off-site swimming provision and residential experiences. These contextual realities require structured, proactive and context-aware risk management systems.

## **PART I – GOVERNANCE & LEGAL FRAMEWORK**

### **1. Statement of Intent**

The school commits, so far as is reasonably practicable, to ensuring the health, safety and welfare of students, staff, visitors and contractors through:

- Systematic hazard identification;
- Structured supervision systems;
- Formal risk assessment processes;
- Investigation of incidents and near misses; and
- Ongoing monitoring and review.

Health and safety is governed deliberately and is not incidental. Although operational tasks may be delegated, accountability remains with senior leadership.

Appendices form part of this policy and provide the formal tools through which risk is assessed, investigated and reviewed.

### **2. Legal & Regulatory Positioning**

KCIS operates within Uganda and is subject to relevant national occupational safety and public health obligations, including principles established under the Ugandan Occupational Safety and Health legislative framework.

As a British Schools Overseas (BSO) institution, KCIS benchmarks its health and safety arrangements against recognised UK standards of good

practice, including the principles of the Health and Safety at Work etc. Act 1974.

Where host country requirements are less prescriptive than UK benchmark standards, KCIS adopts the higher standard where reasonably practicable and sustainable within the operational context of the school.

This policy operates in conjunction with the school's:

- Safeguarding & Child Protection Policy;
- Fire Safety Policy & Evacuation Plan;
- Supervision Policy;
- Educational Visits & Trips Policy;
- Risk Assessment Framework;
- Staff Code of Conduct.

Collectively, these policies form the school's integrated safeguarding, supervision and operational safety framework.

### **3. Scope**

This policy applies to:

- All premises under the control of KCIS;
- All school-organised activities, whether on or off site;
- All residential and educational visits;
- All members of the school community, including students, staff, contractors and visitors.

It governs routine operations and higher-risk activities alike.

### **4. Accountability & Authority**

Ultimate accountability for health and safety rests with the Director of Business Operations with strategic oversight by the Directors.

Operational oversight is supported by the:

- Head of School;
- Director of Education;
- ICT and Administrative Operations Officer;
- Designated Safeguarding Lead.

Delegation of operational tasks does not remove accountability.

All staff are responsible for complying with health and safety procedures and reporting hazards, incidents and near misses. Where a hazard can be made safe immediately without creating additional risk, staff are expected to take reasonable corrective action. Where this is not possible, the hazard must be reported without delay through the appropriate reporting system so that remedial action can be undertaken.

Strategic awareness is maintained through reporting to the Directors.

Incident investigations are completed using Appendix A – Incident Investigation Template. Near misses are logged using Appendix B – Near Miss Log Template.

## 5. Definitions

For the purpose of this policy:

**Hazard** – A condition, activity or circumstance with the potential to cause harm.

**Risk** – The likelihood and potential severity of harm arising from a hazard.

**Near Miss** – An event that had the potential to cause injury or harm but did not result in injury on that occasion.

**Serious Incident** – An incident resulting in or with potential for significant injury requiring medical assessment or hospital referral.

**Supervision Control** – Deployment of staff positioning, zoning and oversight designed to reduce foreseeable risk.

## PART II - RISK MANAGEMENT SYSTEM

### 6. Hierarchy of Control

Effective health and safety management at KCIS is not limited to responding to incidents. It is grounded in a structured approach to identifying and controlling hazards before harm occurs. In managing risks, the school adopts a recognised hierarchy of control, ensuring that the most robust measures are considered before reliance is placed on supervision or individual protective measures.

When assessing any hazard, controls are considered in the following order of priority:

- **Elimination** – Removing the hazard entirely where reasonably practicable;
- **Substitution** – Replacing the hazard with a safer alternative;
- **Engineering Controls** – Introducing physical or structural measures that reduce exposure to risk;
- **Administrative Controls** – Implementing supervision systems, procedures and behavioural expectations;

- **Personal Protective Measures** – Applying individual protective actions where appropriate.

In practice, KCIS applies layered controls. Vehicle movement during student hours is eliminated; sports courts are engineered with fencing; supervision zones are administratively structured across sloped areas; hydration measures are enforced during high temperatures. This structured approach ensures deliberate, proportionate and sustainable risk reduction.

## **7. Risk Assessment Methodology**

Risk assessment at KCIS is a formal leadership tool. It requires identification of hazards, persons at risk, likelihood and severity, existing controls and additional measures required. Review dates are set and responsibility assigned.

Risk assessments are mandatory for:

- Premises and site conditions;
- Educational visits and residential experiences;
- Off-site swimming provision;
- Introduction of new equipment or facilities;
- Structural or environmental changes.

Risk assessments are centrally stored and reviewed periodically or following a significant incident. Investigation outcomes may trigger review of associated risk assessments in accordance with the school's Risk Assessment Framework.

## **8. Monthly Log & Annual Audit**

The school maintains a monthly health and safety log documenting identified hazards, required actions, responsible persons and completion dates. This provides an auditable record of premises management and corrective action.

In addition, an annual internal health and safety review is conducted under the direction of the Director of Business Operations. This review examines:

- Incident and near miss trends;
- Risk assessment currency;
- Maintenance and inspection records;
- Contractor management;
- Swimming and residential controls.

Findings are recorded and actioned.

## **PART III - INCIDENT REPORTING, INVESTIGATION & PREVENTATIVE REVIEW**

### **9. Accident Reporting & Medical Escalation**

All accidents and injuries must be recorded using the school's digital reporting system on the day they occur. Records must include a clear factual account of the incident, immediate actions taken and parent communication where relevant.

Parents are informed of all incidents involving their child. Where practicable, parent communication will occur before the student leaves the school site on the day of the incident. This ensures timely information sharing and supports appropriate follow-up or monitoring at home.

A serious incident is defined as any event resulting in, or with potential for, significant injury requiring medical assessment or hospital referral. This includes, but is not limited to:

- Suspected fracture
- Significant head injury
- Loss of consciousness
- Severe allergic reaction (anaphylaxis)
- Severe asthma episode
- Uncontrolled bleeding
- Any injury where hospital review is advised

In such circumstances:

- Senior leadership is informed immediately;
- Parents are contacted without delay;
- A member of the Senior Management Team accompanies the student to hospital;
- A senior leader remains on site to maintain operational oversight;
- The incident is formally investigated. Investigation is conducted in accordance with Appendix A – Incident Investigation Template and escalation follows Appendix C – Emergency Escalation Framework

The school utilises a consistent local medical facility for school-day emergencies and any emergencies arising from swimming sessions. For

residential trips, the nearest appropriate medical facility is identified in advance.

## **10. Incident Investigation & Preventative Review**

Incident investigation at KCIS is a structured leadership process designed to prevent recurrence. Its purpose is not to allocate blame but to examine whether systems, supervision structures, environmental controls or procedural clarity require adjustment.

All serious incidents trigger a formal written investigation using Appendix A – Incident Investigation Template. The investigation examines both the immediate circumstances and the broader operational context, including:

- Chronology and sequence of events
- Environmental conditions at the time
- Supervision deployment, positioning and ratio
- Behavioural context
- Adequacy and implementation of existing control measures
- Whether previous near misses indicated an emerging pattern
- Whether relevant risk assessments require amendment

Investigations are completed by the Head of School as operational lead. The Director of Business Operations provides oversight and reviews findings to ensure systemic considerations have been addressed. Where relevant, findings are shared with the Director of Education to support whole-school risk awareness.

Each investigation must result in:

- Clearly identified corrective or preventative actions
- Named responsibility for implementation
- Defined review timeframe
- Confirmation when action is complete

Where weaknesses in supervision structure, premises layout or procedural clarity are identified, adjustments are implemented without delay and recorded within the monthly health and safety log.

Incident findings are incorporated into half-termly safety reviews to ensure learning is cumulative rather than isolated.

## **11. Professional Compliance**

Compliance with this policy is mandatory. Failure to adhere to health and safety procedures, supervision expectations or reporting requirements

may constitute professional misconduct and will be addressed under the school's disciplinary procedures.

## **PART IV - PREMISES, ENVIRONMENT & SUPERVISION CONTROLS**

### **12. Premises Infrastructure & Environmental Risk**

The physical layout of the KCIS campus presents distinctive environmental characteristics, including sloped terrain, staircases, raised classroom structures and open-air assembly space. The school recognises that the design of the physical environment directly influences risk profile and therefore requires structured, site-specific controls.

#### **12.1. Site Topography & Movement**

Movement across sloped and stepped areas is actively managed rather than assumed safe. Controls include maintained handrails, anti-slip stair surfacing and strategic staff positioning during high-movement periods. Students are explicitly taught expectations regarding safe movement, particularly on inclines and steps.

Younger students are not allocated upper classrooms. Staff monitor transitional periods closely, recognising that risk increases during arrival, dismissal and break transitions.

#### **12.2. Classroom Ventilation**

Classroom ventilation forms part of environmental risk management. Where weather conditions permit, windows and doors are opened to promote airflow and reduce heat accumulation. Staff exercise judgement in balancing ventilation with weather exposure and safety considerations.

Where classrooms contain outward-opening windows, these must be secured in a fully stable position when opened so as not to create protruding hazards within circulation pathways. Staff ensure that partially opened windows do not create protruding hazards within movement pathways.

#### **12.3. Raised Structures & Assembly Space**

Two classrooms are elevated above the open-air assembly space. Structural integrity is maintained through ongoing maintenance oversight. The area beneath is supervised during use and benefits from clear sight lines, allowing effective adult oversight. Weather conditions are monitored during periods of heavy rainfall to ensure safe use.

#### **12.4. Perimeter & Access Control**

The campus is fully enclosed with perimeter fencing consistent with local context. Razor wire is positioned out of reach and subject to maintenance oversight.

Access is controlled via a gated entry point with two security guards during school hours and three overnight. Vehicles do not enter the compound during student hours, eliminating vehicle–student interaction risk. Security personnel participate in evacuation and lockdown procedures.

#### **12.5. Infrastructure Controls (Water Tanks, Kitchen & Electrical Systems)**

Critical infrastructure elements are managed under structured control systems.

Water storage tanks are elevated on secured structures with restricted access points. Structural integrity is monitored and access is not available to students.

The kitchen operates using gas installations subject to professional inspection. Kitchen staff are trained, a fire blanket is maintained and students do not enter kitchen areas.

Electrical installations are maintained by qualified electricians. Annual professional inspection of fixed installations is conducted. Portable equipment is visually checked routinely to identify wear or damage.

#### **12.6. Infrastructure and Hygiene**

The school maintains fourteen student toilets, separated by gender in accordance with safeguarding expectations, providing provision significantly above minimum recommended ratios for the current student population. Six additional staff toilets are located separately from student facilities.

Approximately ten hand washing stations are distributed across the campus, equating to approximately one station per ten students. All taps are foot-operated to reduce cross-contamination. Students use individual hand cloths for drying, which are washed after single use.

These facilities support effective hygiene practice and infection prevention within the school.

### **12.7. Environmental & Vector Management**

Given the local climate, environmental management forms part of health protection. KCIS conducts termly fumigation, removes stagnant water and trims vegetation to reduce mosquito risk. The site benefits from effective drainage and is monitored for environmental hazards.

The school recognises that local wildlife, including monkeys, may occasionally pass through or enter the campus perimeter. Monkeys are typically transient and do not remain on site. Where wildlife is observed, students are instructed not to approach, feed or interact with animals. Staff supervise students calmly and may temporarily restrict movement in affected areas until the animal has moved on.

Wildlife presence is treated as an environmental supervision matter rather than a routine hazard; however, staff remain alert to potential risk including food attraction and student proximity.

### **12.8. Heat & Hydration**

Kampala's climate requires structured heat management. Students are required to bring water bottles to PE and are provided with scheduled hydration breaks. Tree cover provides shade, cap use is encouraged and activity intensity is adjusted during periods of extreme heat.

### **12.9. Hot Beverage Controls**

To minimise foreseeable burn risk within a primary environment, hot beverages must not be carried in open containers in areas accessible to students. Where hot drinks are taken beyond designated staff areas, they must be contained within sealed, lidded travel mugs designed to prevent spillage.

During parent workshops, coffee mornings or events where students are present or movement around the campus is required, lids are provided for parent beverages. Visitors are expected to use these controls in line with the school's site safety expectations.

## **13. Supervision Systems**

Supervision at KCIS is governed by the school's Supervision Policy, which defines ratios, zoning, positioning and staff responsibilities. Health and safety oversight is inseparable from effective supervision and safeguarding practice. Supervision is therefore treated as a formal control measure

within the school's overall risk management framework rather than an informal timetable arrangement.

Supervision structures operate in conjunction with the Supervision Policy and Safeguarding & Child Protection Policy to ensure alignment between safety oversight and safeguarding expectations.

### **13.1. Break Time Supervision Framework**

During general break periods, approximately four staff supervise an average of 105 students, equating to approximately one adult per 26 students. This ratio is supported by structured environmental controls, including mapped supervision zones, clear lines of sight and defined positioning responsibilities for each member of staff on duty.

Students are organised across four broad sections with free flow between areas. The two playground spaces are open to all students. Football and basketball areas are divided between KS1 and KS2 and operate on a rotational system during the week. This reduces collision risk between age groups and supports equitable access to facilities.

The supervision model relies not solely on numerical ratio but on active positioning, visibility and deliberate zone ownership. Staff are expected to circulate, scan and intervene proactively rather than supervise passively.

### **13.2. Dynamic Supervision Adjustment**

Supervision deployment is reviewed daily. Where a staff member is absent, the Head of School reconfigures the supervision rota to ensure full coverage of required zones. The revised rota is issued to staff by 7:00 a.m. to ensure clarity and continuity of supervision responsibilities.

Supervision levels are adjusted in response to contextual factors including weather conditions, behavioural trends, staffing absence or emerging risk patterns. Where risk profile increases, leadership may increase oversight or reposition staff accordingly.

### **13.3. Structured Activity Supervision**

Lower supervision ratios apply to structured activities, including physical education, swimming and educational visits, as defined within the Supervision Policy and Educational Visits Policy. Swimming supervision operates at a maximum ratio of 1:4, reflecting the increased inherent risk of aquatic activity.

### **13.4. High-Risk Area Oversight**

Areas including slopes, staircases and sports courts receive deliberate staff positioning during peak use periods. Movement expectations are reinforced consistently and unsafe behaviour addressed promptly.

Supervision at KCIS is therefore layered: environmental design, behavioural expectation and staff deployment operate together to reduce risk.

## **PART V - HIGH-RISK ACTIVITIES**

### **14. Swimming Governance**

Swimming forms part of the KCIS' curriculum and is delivered at an external hotel pool facility. As aquatic environments present inherent and elevated risk, swimming provision is governed through structured oversight, layered supervision, exclusive venue control and formal risk assessment.

The pool is hired exclusively for KCIS use during scheduled sessions. No members of the public use the pool or changing facilities at these times. This eliminates shared-user risk and allows the school to maintain direct oversight of student movement and changing room standards. KCIS provides its own cleaner during swimming sessions to ensure hygiene standards are maintained in line with school expectations.

KCIS contracts a professional swimming provider to deliver instruction. Instructors engaged through this provider hold lifeguard training through the company. Written confirmation of instructor qualifications is obtained from the provider. The school does not delegate safeguarding responsibility to the venue or provider and retains direct supervisory authority throughout all sessions.

#### **14.1. Supervision & Staffing Structure**

Students are ability-grouped within the pool to reduce differential exposure to risk.

The staffing structure operates as follows:

- A minimum of two trained swimming instructors deliver technical instruction and lifeguard response in aquatic emergencies. Where one instructor is providing in-water support, the second instructor maintains poolside lifeguard positioning to ensure continuous visual surveillance.

- The KCIS Physical Education teacher maintains continuous “eyes on water” surveillance of the pool and is responsible for behavioural supervision and immediate alert to instructors if risk is identified.
- A class teacher supervises students waiting poolside and manages entry and exit procedures.
- One teacher is assigned to supervise each changing room area. During group changing periods, teachers remain positioned immediately outside the changing room with the door slightly ajar to allow auditory supervision while preserving pupil privacy. Internal cubicles provide privacy for individual changing. Staff do not enter cubicle areas unless there is a safeguarding or medical concern requiring intervention;
- For nervous swimmers and non-swimmers, a trained swimming instructor remains in the water providing direct, close-proximity support. This arrangement ensures assisted buoyancy control and immediate intervention where required. In-water instructional support does not replace poolside lifeguard surveillance; at least one qualified instructor remains positioned for full pool visual oversight at all times.

Swimming sessions operate at a maximum student-to-adult ratio of 1:4. The 1:4 ratio includes KCIS staff and qualified swimming instructors combined; however, a minimum of two KCIS staff members must be present at all sessions, regardless of group size, with three present in most cases depending on grouping structure. Three KCIS staff members are present for all KS1 swimming.

Drivers are not included within supervision ratios and do not supervise students at any stage.

#### **14.2. Poolside & Changing Room Controls**

Students wait poolside in a designated seating area prior to entry. They remain in a defined group under the supervision of a named teacher. Entry and exit procedures are structured and controlled.

Changing facilities are used exclusively by KCIS during hired sessions. Boys and girls use separate changing rooms in line with safeguarding expectations. Changing room supervision operates in accordance with the staffing structure outlined in Section 14.1.

Where a pupil needs to access toilet facilities during swimming sessions, they are escorted to the entrance of the relevant facility. The supervising teacher checks that the area is unoccupied before permitting entry and

remains positioned outside while the pupil uses the facility, maintaining supervision without compromising privacy.

Free swimming without supervision is not permitted. At the end of structured sessions, students may be permitted a short period (up to five minutes) of supervised free time at staff discretion. This remains under full adult oversight.

Pupil numbers are verified prior to pool entry. During sessions, continuous visual supervision is maintained by instructors and the PE teacher, who remain actively aware of pupil positioning at all times. As the facility is hired exclusively for KCIS use, exit procedures are controlled and supervised to ensure all pupils leave the pool area together.

### **14.3. Control Measures Within the Pool**

Control measures include:

- Ability grouping according to competence;
- Continuous visual scanning by instructors and PE teacher;
- Immediate intervention for unsafe conduct;
- Structured entry and exit protocols;
- Clear behavioural expectations reinforced before each session;
- Use of pool noodles where appropriate for assisted reach support;
- Provision of rescue ring and rescue board by the swimming provider.

Swimming provision operates as part of the school's curriculum and is governed in conjunction with the Supervision Policy, Safeguarding & Child Protection Policy and the school's Risk Assessment Framework. A formal swimming risk assessment is maintained and reviewed periodically in accordance with Section 6 of this policy.

### **14.4. Emergency & Water Safety Education**

Emergency medical arrangements for swimming sessions are consistent with those used during the school day. Emergency contact information is accessible during all sessions.

In addition to routine swimming instruction, students participate annually in water safety sessions conducted in clothing (pyjama sessions). These sessions develop understanding of buoyancy, movement restriction and real-world water safety awareness.

Swimming governance at KCIS is therefore layered: exclusive venue control, trained instruction, behavioural supervision, structured grouping, rescue equipment provision and formal risk assessment operate together to reduce risk.

## **15. Residential & Educational Visits**

Residential provision and off-site visits are governed through structured supervision, safeguarding oversight and formal risk assessment. All visits operate in accordance with the Educational Visits & Trips Policy and the risk assessment requirements set out in Section 6 of this policy.

Where relevant, planning for educational visits is informed by recognised good practice guidance relating to off-site activity governance. Risk assessment and supervision structures are proportionate to the activity profile and contextual risk.

Residential supervision operates at a minimum ratio of 1:6, with lower ratios applied where age, activity profile or contextual risk requires enhanced oversight.

Class residential trips are led by the relevant class teacher. A female teacher is always present. A male adult with safeguarding clearance accompanies the trip to ensure balanced safeguarding provision. Discovery camps are staffed by mixed gender teaching staff from KCIS.

Sleeping arrangements are single-sex. Tents are positioned deliberately, with staff located at perimeter points to ensure distributed oversight and clear lines of supervision. A student does not sleep alone unless they are the sole student of that gender attending; in such circumstances, a formal, documented risk assessment is completed and approved by senior management prior to departure.

Medical oversight forms part of residential planning. Parental medical information is carried securely by staff, first aid kits are mandatory, and the nearest appropriate medical facility is identified in advance and communicated within the visit planning documentation.

Residential governance at KCIS therefore operates through layered control: structured supervision ratios, safeguarding-aware staffing, deliberate tent positioning, formal risk assessment and pre-identified emergency arrangements.

## **16. Transport Safety**

The school operates a bus and minibus (known around school as 'the van').

Seatbelts are compulsory for all passengers. Journey logs and maintenance logs are maintained. Private staff vehicles are not used for routine student transport.

Only the authorised school driver may drive the school bus. The school minibus may only be driven by a staff member who holds the appropriate licence and has been formally authorised by the school. At present, the Director of Education is the only additional member of staff who holds the required minibus licence and is therefore authorised to drive.

Where the authorised school bus driver is unavailable due to illness or operational requirement, the school engages a contracted professional driver through an established transport provider known to the Operations Team. Similarly, where both the school bus and minibus are required simultaneously, an additional contracted driver may be engaged through the same provider.

All contracted drivers operate under the school's safeguarding and conduct expectations. However, drivers, whether employed directly or contracted, do not supervise students, are not included within supervision ratios and are never left alone with children. A member of teaching or supervisory staff is present at all times during student transport. This ensures operational continuity without compromising safeguarding standards or supervision integrity.

Emergency medical transport arrangements are further defined in Section 19.

## **PART VI - HEALTH PROTECTION & MEDICAL MANAGEMENT**

### **17. Health Protection Framework**

Health protection at KCIS is managed through structured environmental control, hygiene systems and medical oversight. The school recognises that health risk extends beyond injury and includes infection control, environmental exposure and individual medical need.

Health protection measures are integrated into daily operations and are reviewed periodically as part of the school's health and safety audit cycle. The school ensures that a substantial proportion of staff hold current First Aid and CPR certification at all times. Training is renewed periodically in accordance with recognised provider standards to maintain operational readiness during medical incidents.

First aid boxes are maintained in each class' room across the campus and are checked periodically to ensure adequate stock levels. Further first aid is available from the school office where a more comprehensive first aid kit is maintained.

Staff hold a professional duty to ensure they are medically fit to undertake their responsibilities safely. Staff must not attend work if illness may compromise supervision, safeguarding or operational safety. Any notifiable or infectious illness affecting staff or students must be reported promptly to the Senior Management Team so that appropriate risk assessment and communication can be undertaken.

### **17.1. Sick Bay & Routine Illness Management**

KCIS maintains a designated sick bay located adjacent to the main office. This arrangement ensures that students who are unwell can be monitored appropriately while maintaining privacy and dignity.

The sick bay is ventilated and directly accessible to senior administrative staff. A student who becomes unwell during the school day is assessed and monitored until:

- Collected by a parent or guardian; or
- Returned to class if symptoms resolve and it is safe to do so.

All medical incidents are recorded digitally.

Students are not left unattended while in the sick bay.

### **17.2. Medication Administration**

Medication is administered only in accordance with documented procedures. Written parental consent is required for prescribed medication brought into school. All administration is logged digitally.

Medication is stored securely but accessibly. Emergency medication, including EpiPens, is stored in designated classroom locations and in the school office. Senior leadership and designated staff are trained in their use.

Where required, Individual Health Care Plans are developed and stored securely.

## **18. Emergency Medical Escalation**

Serious medical incidents are escalated immediately to senior leadership. A serious medical incident includes, but is not limited to:

- Suspected fracture;
- Significant head injury;
- Severe allergic reaction;
- Uncontrolled bleeding;
- Severe asthma episode;
- Loss of consciousness.

In such circumstances:

- Parents are contacted without delay;
- A member of the Senior Management Team accompanies the student to hospital;
- A senior leader remains on site;
- The incident is formally recorded and reviewed.

Emergency contact information is accessible at all times during school hours and on off-site activities.

KCIS utilises a consistent local medical facility for day-to-day emergencies and swimming sessions. For residential trips, the nearest appropriate medical facility is identified in advance and communicated to parents.

## **19. Transport for Medical Emergencies**

The school operates clear controls regarding student transport in order to minimise risk and ensure accountability.

Private vehicles are not used for routine student transport. In exceptional emergency circumstances where no school vehicle is immediately available and delay would compromise student welfare, a Director (either the Director of Business Operations or the Director of Education) may authorise the use of their own vehicle solely for emergency medical transport. In such circumstances:

- The Director drives the vehicle;
- The vehicle must have functioning seatbelts for all occupants;

- Parents are informed immediately;
- The transport decision and circumstances are formally recorded;
- A senior leader remains on site to maintain operational oversight.

If no Director is available and delay would place a student at immediate risk, the ICT and Administrative Operations Officer may transport the student directly to hospital as an emergency measure only. Such use is restricted to urgent medical necessity and must be recorded and reviewed by senior leadership.

This clause exists solely to protect student welfare in genuine emergencies and does not replace structured transport arrangements.

All transport decisions operate in accordance with the Supervision Policy and Safeguarding & Child Protection Policy to ensure pupils are never left unsupervised.

## **20. Infection Prevention & Environmental Hygiene**

KCIS recognises that infection prevention is an operational health and safety responsibility, particularly within a primary school environment and in a tropical climate. Hygiene systems are therefore embedded within daily routines rather than applied reactively.

Handwashing facilities are distributed across the campus and operated by foot pedal to reduce cross-contamination. Students use individual hand cloths for drying, which are washed after single use. This system ensures hygiene standards exceed basic shared-towel provision.

Cleaning staff are trained in appropriate safe handling and cleaning procedures as part of environmental hygiene oversight. Cleaning materials are stored securely and are managed to prevent hazardous chemical interaction. They are inaccessible to students. Where body fluids (including blood, vomit, urine or faeces) are present, cleaning is undertaken promptly using appropriate protective gloves. Organic matter is removed prior to disinfection to ensure effective decontamination.

Termly fumigation is conducted and the site is monitored for stagnant water and vegetation growth to reduce mosquito-related risk.

Environmental hygiene measures are reviewed as part of the monthly health and safety log and during the annual internal audit.

## **21. Heat, Sun Exposure & Hydration**

Given the climatic conditions in Kampala, heat management is treated as a foreseeable environmental risk.

Control measures include:

- Mandatory water bottles during PE;
- Drinking water on all tables at lunchtime;
- Drinking water stations in all classrooms;
- Scheduled hydration breaks;
- Use of natural shade;
- Encouragement of cap use which is part of the school uniform;
- Adjustment of activity intensity during extreme heat.

Staff monitor students for signs of dehydration or heat distress during outdoor activity.

## **22. Near Miss**

KCIS recognises that effective risk management requires identification of potential harm before injury occurs. A near miss is defined as any event or circumstance that had the potential to cause injury or harm but did not result in injury on that occasion.

All staff are required to report near misses within 24 hours using the school's digital reporting system. The purpose of near miss reporting is preventative learning rather than fault-finding.

Each near miss record must include:

- Description of the event;
- Location;
- Contributing factors;
- Immediate action taken;
- Recommended preventative action;
- Named responsible person for follow-up;
- Investigation conclusion;
- Review date.

The Head of School holds operational responsibility for reviewing near miss reports and ensuring timely corrective action. The Director of Business Operations holds oversight responsibility and reviews near miss data in conjunction with the Head of School. The ICT and Administrative Operations Officer supports this process through maintenance of reporting systems and data collation but does not hold decision-making authority.

Near miss reports are formally reviewed every half term. Trends, recurring hazards or supervision concerns are identified and addressed through adjustment of controls, supervision deployment or environmental modification.

The Head of School provides summary operational findings to the Director of Business Operations for oversight and to the Director of Education to ensure whole-school strategic awareness of emerging risk patterns.

Near miss data forms part of the school's annual health and safety audit process under the direction of the Director of Business Operations.

## **PART VII - EMERGENCY RESPONSE & SITE SECURITY**

### **23. Fire Safety**

Fire safety arrangements are governed under the separate Fire Safety Policy and Evacuation Plan. All staff participate in regular fire drills and are familiar with evacuation routes and assembly procedures. All staff are required to maintain working knowledge of evacuation routes, assembly arrangements and emergency role allocation. This forms part of professional induction and ongoing operational expectation. Security personnel are trained in evacuation response and participate in drills.

Evacuation drills are conducted at least once per term and include variations in timing (e.g. break periods or arrival/departure times) to ensure preparedness across operational contexts. Designated staff undertake defined roles during evacuation, including zone sweep and assembly verification responsibilities, in accordance with the Fire Safety Policy and Evacuation Plan.

Following evacuation drills or unplanned evacuations, the Operations Team, alongside the Head of School, conducts a structured review to evaluate evacuation timing, supervision clarity and communication effectiveness. Where weaknesses are identified, corrective adjustments are implemented and recorded within the health and safety review cycle.

Fire equipment, including extinguishers and kitchen fire blanket, is maintained and monitored.

All fire incidents, including minor incidents extinguished on site, are recorded and reviewed. Where required under local regulation or risk

assessment judgement, the Fire Service is notified to ensure appropriate external oversight and review.

#### **24. Lockdown Procedures**

The school maintains a written lockdown procedure applicable in the event of:

- Unauthorised individual on site;
- Animal entering the compound;
- External security concern.

Lockdown drills are practised. Security personnel coordinate directly with the ICT and Administrative Operations Officer during implementation. The Head of School is informed and retains overall operational oversight. Communication protocols are clearly defined to ensure staff understanding of signal and response expectations.

#### **25. Power Disruption**

Given the local context, intermittent power disruption may occur. The school maintains continuity of safe operation through use of manual bell signalling and adequate natural lighting within classrooms. In the event of extended disruption, leadership assesses operational safety and determines whether adjustments to timetable or activity are required.

### **PART VIII - MONITORING, ASSURANCE & POLICY REVIEW**

#### **26. Ongoing Monitoring & Leadership Oversight**

Health and safety at KCIS is monitored through structured leadership review rather than informal observation. Oversight mechanisms operate at operational, strategic and review levels to ensure continuous compliance and improvement.

The Head of School holds operational responsibility for day-to-day health and safety implementation. This includes supervision deployment, incident response, near miss review and premises awareness.

The Director of Business Operations holds oversight responsibility and reviews health and safety performance in conjunction with the Head of School. This ensures that risk trends, infrastructure considerations and systemic weaknesses are identified at leadership level.

Health and safety matters are reported to the Directors to ensure strategic awareness and collective accountability. This ensures that governance oversight remains active rather than passive and that Directors are able to challenge, review and support risk management systems effectively.

## **27. Termly & Half-Termly Review Cycle**

Health and safety data is reviewed at defined intervals.

Half-termly review includes:

- Near miss log analysis;
- Incident trend review;
- Confirmation of corrective action completion;
- Supervision structure review where necessary.

Termly review includes:

- Premises inspection outcomes;
- Maintenance record confirmation;
- Swimming and high-risk activity review;
- Transport oversight;
- Environmental and hygiene review.

Where trends or patterns emerge, leadership adjusts supervision deployment, environmental controls or procedural clarity accordingly.

## **28. Annual Internal Audit**

An annual internal health and safety audit is conducted under the direction of the Director of Business Operations.

This audit examines:

- Risk assessment currency;
- Compliance with supervision ratios and zoning;
- Incident investigation quality;
- Near miss reporting effectiveness;
- Infrastructure maintenance records;
- Contractor management practices;
- High-risk activity governance, including swimming and residential provision.

Findings are documented and actioned. The annual audit forms part of the school's continuous improvement framework.

## **Policy Review**

This policy is reviewed annually or sooner if required due to:

- Significant incident;
- Structural or operational change;
- Change in regulatory expectation;
- Identified systemic weakness.

Review is led by the Director of Business Operations in consultation with the Head of School and Director of Education.

## **APPENDIX A – INCIDENT INVESTIGATION TEMPLATE**

1. Date & Location of Incident
2. Persons Involved
3. Chronology of Events
4. Environmental & Supervision Context
5. Control Measures in Place
6. Contributing Factors
7. Corrective / Preventative Actions
8. Named Responsible Person
9. Review Date
10. Investigation Conclusion & Leadership Sign-Off

## **APPENDIX B – NEAR MISS LOG TEMPLATE**

- Date
- Location
- Description of Event
- Immediate Action Taken
- Recommended Preventative Action
- Responsible Person
- Review Date
- Investigation Conclusion

## **APPENDIX C – EMERGENCY ESCALATION FRAMEWORK**

Incident Identified → Senior Leadership Informed → Parent Contacted → Hospital (if required) → Formal Investigation → Preventative Review.