



ST JOHN'S COLLEGE

POLICY TITLE	Safeguarding Policy
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1. INTRODUCTION

- 1.1. St John's College prioritises maintaining a safe environment for its students, aiming to prevent harm and foster their overall development. The school promotes the presence of trustworthy role models who respect, protect, and support students' spiritual, physical, emotional, intellectual and social growth. Part of their duty of care is to combat discrimination and harm within the institution.
- 1.2. St John's College aims to create an atmosphere where everyone involved can have a safe, rewarding, and positive experience. The school recognises that harassment and abuse can happen anywhere and acknowledges the importance of protecting everyone within the St John's College community. This includes teachers, students, administrators, coaches, staff and volunteers, who all have the right to participate in a secure and inclusive environment, free from any form of harm, discrimination, abuse, violence, and neglect.
- 1.3. Safeguarding at St John's College is the responsibility of the institution, and we are committed to ensuring that all staff, volunteers, operations, and programmes prioritise the well-being of children by not causing them harm or exposing them to harassment, abuse, or exploitation.

2. GOVERNANCE AND OVERSIGHT

- 2.1. Safeguarding is a core governance responsibility
- 2.2. The St John's College Council holds ultimate accountability for ensuring that the safeguarding systems, policies and culture are effective.
- 2.3. The Council of St John's College is responsible for the approval of this policy. In addition, it must receive an annual safeguarding report and ensure adequate resourcing for safeguarding measures.
- 2.4. The Executive Head has operational responsibility for safeguarding, including ensuring compliance with legislation and policy, appointing DSOs, overseeing training and ensuring concerns are responded to appropriately.
- 2.5. The Safeguarding Forum supports the Executive Head by reviewing cases, monitoring implementation, driving awareness and coordinating whole-school practice. Terms of reference, membership and meeting frequency must be documented and reviewed annually.

3. GOVERNING LEGISLATION AND POLICY FRAMEWORK

- 3.1. This policy should be read in conjunction with relevant legislation, HR Handbook, relevant policies and the SACE Code of Professional Ethics which refers to expected areas of professional conduct for all working and volunteering at St John's College.
 - 3.1.1. Section 28, Constitution of South Africa
 - 3.1.2. South African Schools Act 84 of 1996

- 3.1.3. Children's Act 38 of 2005
- 3.1.4. Sexual Offences and Related Matters Amendment Act 32 of 2007
- 3.1.5. Protection of Personal Information Act 4 of 2013 (POPIA)
- 3.1.6. Employment of Educators Act 76 of 1998
- 3.1.7. Child Justice Act 75 of 2008
- 3.1.8. Change Room Policy
- 3.1.9. Prep Anti-Bullying Policy
- 3.1.10. Transport Policy
- 3.1.11. National and Overseas Tour Policy
- 3.1.12. Anti-Discrimination Policy
- 3.1.13. Headmaster's Regulations
- 3.1.14. Substance Use and Abuse Policy (internal)
- 3.1.15. Staff Social Media Policy (internal)
- 3.1.16. Extraneous Employment Policy (internal)
- 3.1.17. Recruitment Policy
- 3.1.18. Vetting Policy
- 3.1.19. Whistleblower Policy
- 3.1.20. Digital Communication Policy
- 3.1.21. Code of Ethics (internal)
- 3.1.22. Declaration of Good Standing (internal)

4. PURPOSE

- 4.1. The purpose of the St John's College's Safeguarding Policy is to ensure that students and other stakeholders at St John's College can achieve success in their roles without fear of harassment or abuse. The key objectives of the policies are to:
 - 4.1.1. Ensure everyone in St John's College understands that all forms of harassment and abuse are unacceptable and will not be tolerated.
 - 4.1.2. Ensure anyone who has witnessed or experienced harassment or abuse within St John's College, has the ability to report the incident without fear of victimisation or retaliation.
 - 4.1.3. Ensure an appropriate and coordinated response to any incidents of harassment or abuse that happen within any environment connected to the participation in a St John's College event, irrespective of whether it is on school premises or not.
 - 4.1.4. Implement effective measures that minimise the likelihood of incidents of harassment and abuse arising in St John's College.

- 4.1.5. Ensure all reasonable steps are taken during the recruitment of staff and volunteers to prevent unsuitable individuals from working at St John's College.

5. SCOPE

- 5.1. St John's College is committed to ensuring the safety and well-being of all its students and adopting a proactive approach in this regard. We understand that we are an important part of the wider safeguarding system for children, as we are in a position to identify concerns early, provide help and prevent escalation. We will ensure a whole school approach to safeguarding and ensure that this underpins all relevant aspects of our process and policy development. We therefore pledge to revise our policies and procedures annually or more frequently as required to achieve this.
- 5.2. This Safeguarding Policy, unless otherwise stipulated, applies to all stakeholders. All stakeholders must place the protection and well-being of children in a place of paramount importance. (Section 28, Constitution of South Africa)

6. DEFINITIONS

- 6.1. *"Abuse"* shall mean any form of abuse or harassment which may occur in one of six (6) forms either in isolation or in combination. These are, but not limited to Psychological Abuse; Physical Abuse; Sexual Harassment; Sexual Abuse; Neglect or Bullying. This can happen based on any grounds including race, religion, colour, creed, ethnic origin, physical attributes, gender, sexual orientation, age, disability, socio-economic status, and athletic ability. It can include a once-off incident, or a series of incidents and it may be in person or online.
- 6.2. *"Adult"* shall mean persons 18 years and older, men and women including persons with impairments.
- 6.3. *"Bullying or cyberbullying"* shall mean unwanted, repeated, and intentional, aggressive behaviour usually among peers, and involves a real or perceived power imbalance. Bullying can include actions such as making threats, spreading rumours or falsehoods, attacking someone physically or verbally or deliberately excluding someone. This can happen in the real world or the cyberworld.
- 6.4. *"Child"* shall mean any person who has not turned 18 years of age unless, under the law applicable to the child, majority is attained earlier. Early childhood relates to those below 8 years of age. A juvenile, young person and adolescents are 10-18 years of age.
- 6.5. *"Council"* shall mean St John's College's Council.
- 6.6. *"Designated Safeguarding Officer (DSO)"* shall mean the designated persons from St John's College who are appointed and trained as the school's Designated Safeguarding Officers.
- 6.7. *"Grooming"* shall mean the action or behaviour used to create an emotional connection and

- build trust with a minor, with the intention of creating an inappropriate relationship and causing harm. This may happen in person and/or online.
- 6.8. *“Harassment”* (See definition under Abuse).
 - 6.9. *“Hazing”* shall mean a form of induction bullying. It is usually a ritual, run by older students that creates a “rite of passage” to a new student into the school or sports team.
 - 6.10. *“Homophobia”* shall mean antipathy, contempt, prejudice, aversion or hatred towards lesbian, gay or bisexual individuals.
 - 6.11. *“In loco parentis”* shall mean the legal responsibility of a person or organisation to partly take on the role and responsibilities of a parent, in the absence of a parent.
 - 6.12. *“Line of sight”* shall mean the requirement that all interactions have the possibility to be witnessed by another, due to either an open door, visibility through a window, or engagement in an open outdoor space.
 - 6.13. *“Low-level concern”* shall mean a behaviour by a perpetrator that does not meet the threshold for formal investigation but raises a concern about boundaries, patterns or judgement.
 - 6.14. *“Neglect”* shall mean the failure of parents or caregivers to meet a child’s physical, intellectual, emotional or social needs; or failure to protect a child from exposure to danger. Examples of basic needs include, but are not limited to: adequate nutrition, access to health care services, basic education, a safe and stable environment. This definition equally applies to teachers and any St John’s College staff.
 - 6.15. *“Negligence”* shall mean the failure of a teacher or another person with a duty of care towards a student to provide a minimum level of care to that student, who may cause harm, allow harm to be caused, or create an imminent danger of harm.
 - 6.16. *“Non-accidental harm”* shall mean any unwelcome sexual harassment and/or abuse, financial abuse, bullying and emotional abuse, hazing, neglect, physical abuse, and child exploitation.
 - 6.17. *“Physical abuse”* shall mean non-accidental trauma or physical injury caused by punching, beating, kicking, biting, burning or otherwise harming a student.
 - 6.18. *“Psychological abuse”* shall mean: a pattern of deliberate, prolonged, repeated non-physical behaviours within a power differentiated relationship. This form of abuse is at the core of all other forms. Some definitions refer to emotional or psychological abuse interchangeably. In this document, we refer to psychological abuse in recognition that the psyche consists of more than emotions. It also consists of cognitions, values and beliefs about oneself, and the world. The behaviours that constitute psychological abuse target a person’s inner life in all its profound scope.
 - 6.19. *“Rule of two”* shall mean The two-adult rule often referred to as the Rule of Two, which states that no fewer than two adults and two children must be present at all times.
 - 6.20. *“Safeguarding”* shall mean all measures undertaken to promote the welfare, safety and

- wellbeing of students and to protect them from harm, abuse, neglect or exploitation.
- 6.21. “Safeguarding Awareness Certificate (SAC)” shall mean the safeguarding training to be completed by every teacher and staff member (volunteer or remunerated) affiliated to St John’s College.
- 6.22. “*Safeguarding Partner*” shall mean a person or organisation appointed by St John’s College as an outsourced Partner to consult on any or all matters pertaining to Safeguarding within St John’s College. This may refer to any form of abuse, harassment or proactive measures including but not limited to recruitment, general school safeguarding (both reactive and proactive), or any matter that St John’s College feels they may need assistance in Safeguarding.
- 6.23. “*Safeguarding Policy*” shall mean the guidelines provided by St John’s College in defining their proactive approach in child protection as well as the relevant steps to be taken when there is a safeguarding report
- 6.24. “*Service Provider*” shall mean any person or organisation who or that renders a service, no matter what the nature of that service is, to the school.
- 6.25. “*Sexism*” shall mean the belief that one sex or gender is superior to another. Sexism is distinguished by prejudice or by discrimination based on a person's sex or gender. Although sexism can affect anyone, women and girls are more often affected by sexism.
- 6.26. “*Sexual abuse*” shall mean any conduct of a sexual nature, whether non-contact, contact or penetrative, where consent is coerced/ manipulated or is not or cannot be given.
- 6.27. “*Sexual harassment*” shall mean any unwanted and unwelcome conduct of a sexual nature, whether verbal, non-verbal or physical.
- 6.28. “*Staff*” shall mean all people who are working for some form of remuneration, which may include, but is not limited to, cash, and who are bound or not bound by a contract of employment.
- 6.29. “*Students*” shall mean all students of all ages.
- 6.30. “*Students with disabilities*” means those who have long-term physical, mental, intellectual, or sensory impairments that, on interaction with certain barriers, may hinder their full and effective participation in society on an equal basis with others.
- 6.31. “*Volunteers*” shall mean any person, adult or child, who is working for or assisting St John’s College in the continuation of any service, event or function or serving on any committee, or volunteering in any capacity for any function in any structure.
- 6.32. “*Young adults*” shall mean young persons over the age of 18 years transitioning from childhood to adulthood. With limited life experience, they might not have developed resilience and may be more at risk of exploitation, harm or abuse.

7. TYPES OF HARRASSMENT AND ABUSE

- 7.1. St John's College recognises that harassment and abuse can be expressed in six forms which may occur in combination or in isolation. These include:
 - 7.1.1. psychological abuse;
 - 7.1.2. physical abuse;
 - 7.1.3. sexual harassment;
 - 7.1.4. sexual abuse;
 - 7.1.5. neglect, and;
 - 7.1.6. discriminatory abuse.
- 7.2. Psychological Abuse is sometimes referred to as Emotional Abuse and can include the following:
 - 7.2.1. Prevention of making choices or expressing their opinions;
 - 7.2.2. Forced social isolation; not allowed to see friends, access education;
 - 7.2.3. Denying access to mobility or communication aids;
 - 7.2.4. Use of threats, fear or bribes;
 - 7.2.5. Prevention of accessing services;
 - 7.2.6. Cyber-bullying;
 - 7.2.7. Intimidation, humiliation, bullying, threats, harassment, or verbal abuse.
- 7.3. The different types of Physical Abuse can include:
 - 7.3.1. Assault – hitting, slapping, kicking, pinching, punching;
 - 7.3.2. Physical punishments;
 - 7.3.3. Force feeding or lack of feeding;
 - 7.3.4. Inappropriate use of restraint or restricting movement;
 - 7.3.5. Misuse of medication;
 - 7.3.6. Involuntary isolation;
 - 7.3.7. Purposefully making conditions uncomfortable, such as a lack of warm bedding.
- 7.4. Sexual Harassment can include:
 - 7.4.1. Inappropriate touching, sexual teasing, or innuendos;
 - 7.4.2. Indecent exposure;
 - 7.4.3. Sexual photography or forced use of or exposure to pornography.
- 7.5. Sexual Abuse can include:
 - 7.5.1. Any sexual activity that is not consensual;
 - 7.5.2. Rape, attempted rape or sexual assault;
 - 7.5.3. Indicators can include.
- 7.6. Neglect can include:
 - 7.6.1. Absence of emotional, physical or medical health care;

- 7.6.2. Withholding of basic necessities such as nutrition, heating and medication;
- 7.6.3. Isolation.
- 7.7. Discriminatory Abuse may occur based on:
 - 7.7.1. Race or religion;
 - 7.7.2. Gender or gender identity;
 - 7.7.3. Age;
 - 7.7.4. Disability;
 - 7.7.5. Sexual orientation.
- 7.8. Harassment and abuse can be based on any grounds, including race, religion, colour, creed, ethnic origin, physical attributes, gender, sexual orientation, age, disability, socio-economic status and athletic ability. It can include a one-off incident or a series of incidents. It may be in person or online (or by other means). Harassment may be deliberate, unsolicited and coercive.
- 7.9. Harassment and abuse often result from an abuse of authority, meaning the improper use of a position of influence, power, or authority by an individual against another person.

8. RESPONSIBILITIES OF ST JOHN'S COLLEGE TO SAFEGUARDING

- 8.1. St John's College recognises that it has a responsibility for guiding all structures of St John's College in safeguarding in school life as defined in the South African Schools Act 84 of 1996.
- 8.2. Additionally the Children's Act 38 of 2005 as amended requires a person who has no parental responsibilities and rights in respect of a child but who voluntarily cares for the child either indefinitely, temporarily or partially, including a care-giver who otherwise has no parental responsibilities and rights in respect of a child, must, whilst the child is in that person's care safeguard the child's health, well-being and development; and protect the child from maltreatment, abuse, neglect, degradation, discrimination, exploitation, and any other physical, emotional or mental harm or hazards.
- 8.3. Harassment and abuse can have a significant long-term negative impact on a child's and young adults' life and performance as well as general health and well-being, particularly if the child has not been able to disclose their experiences or access support.
- 8.4. St John's College has an important leadership role in embedding a no-tolerance approach towards all forms of harassment and abuse.
- 8.5. St John's College is committed to the principles of safeguarding and good governance and has developed this policy for the prevention of harassment and abuse within the school which requires every staff member and volunteer to adopt and implement these policies and procedures.

- 8.6. St John's College undertakes to ensure that due diligence on every staff member and volunteer affiliated to St John's College is carried out to ensure that all St John's College staff, and volunteers have met best Safeguarding Practices. The due diligence and inspection of all safeguarding regulations will be completed annually by the school's Appointed Safeguarding Partner.
- 8.7. St John's College will ensure that all applications for roles in the school that involve "regular contact" with children, young people, persons with a mental and/or physical should be carefully considered and scrutinised, regardless of whether the application is for voluntary or paid work with the level of checking completed appropriate to the role being applied for.
- 8.8. St John's College is to ensure all existing and new volunteers and employees working in roles that involves "regular contact" with children, young people, persons with a mental and/or physical disability and other vulnerable adults; or where they hold a position of trust; or existing staff or volunteers who change their role to work with these vulnerable groups, are required to complete a vetting process. (Reference: The Sexual Offences and Related Matters Amendment Act 32 of 2007, Chapter 6 for Sexual Offenders Register. And Children's Act Sections 120 and 126 for Criminal and Child Protection Register.)

9. EXPECTATION OF ST JOHN'S COLLEGE DESIGNATED SAFEGUARDING OFFICERS

- 9.1. St John's College must appoint Designated Safeguarding Officers. (It is advisable that there is a minimum of 2, one for sport and extra murals, and one for each section of the school) These persons should be suitably qualified persons. Each one of them will act individually or in collaboration, when it is required.
- 9.2. The Executive Headmaster of St John's College must appoint the Designated Safeguarding Officers.
- 9.3. The Designated Safeguarding Officers, on behalf of St John's College, must sign that they understand and acknowledge the St John's College Code of Ethics.
- 9.4. The Designated Safeguarding Officer must ensure that all school safeguarding measures are fulfilled.
- 9.5. St John's College Designated Safeguarding Officers have the following responsibilities and duties:
 - 9.5.1. To be the main point of contact for any student of their school needing assistance with the reporting of suspected non-accidental harm, discrimination, bullying, harassment, abuse, violence and/or neglect at any time.
 - 9.5.2. Investigating any allegations of suspected non-accidental harm, discrimination, bullying, harassment, abuse, violence and/or neglect at any time.

- 9.5.3. To be the main point of contact for their school's staff and students or parents about any request concerning the Safeguarding Policy or safeguarding matters.
- 9.5.4. To provide, if requested, support to anyone who reports a case of possible non-accidental harm, discrimination, bullying, harassment, abuse, violence and neglect and/or to anyone who has been the subject of harassment and/or abuse.
- 9.5.5. To implement and uphold all elements of the St John's College Safeguarding and other supporting policies.
- 9.5.6. To agree on safeguarding plans with coaches for any trips or tours.
- 9.5.7. To respect confidentiality, as set out in this Policy.
- 9.5.8. To inform the Headmaster or relevant HOD, if there are any allegations that may in any way lead to the registering of a criminal offence and to ensure without fear or favour that the matter is reported to the relevant authorities in accordance with the applicable law and this needs to happen as soon as possible.
- 9.5.9. To ensure that the safeguarding responsibilities of the school are always displayed in the school and are always adhered to.
- 9.5.10. To ensure that the Rule of Two guideline is explained to all students, staff and parents.
- 9.5.11. To ensure that every person has the ability to report anonymously if need be and that these anonymous reports are treated in alignment with this policy.

10. HUMAN RESOURCE RESPONSIBILITIES

- 10.1. Ensuring all staff and volunteers, defined in the policy, are cleared against the Sexual Offences Register, Child Protection Register, and have a criminal check as defined in the Safeguarding Policy.
- 10.2. Ensure all staff and volunteers, defined in the policy, have completed their Safeguarding Awareness Certificate.
- 10.3. Ensure that all staff and volunteers, defined in the policy, have signed their Declaration of Good Standing and Code of Ethics.

11. RESPONSIBILITIES OF ANY PERSON AFFILIATED TO ST JOHN'S COLLEGE

- 11.1. It is the responsibility of every person employed or volunteering at St John's College to:
 - 11.1.1. Have a basic knowledge of how to ensure the safety of all students and to have completed their Safeguarding Awareness Certificate.
 - 11.1.2. Have appropriate opportunities to develop and maintain the necessary attitudes, skills, and knowledge to do this.
 - 11.1.3. To ensure everyone has the right to participate in St John's College in an environment free from non-accidental harm, discrimination, bullying, harassment, abuse, violence,

and neglect, irrespective of their race, gender, sex, ethnic or social origin, skin colour, sexual orientation, age, disability, religion, conscience, belief, culture, language and birth or athletic ability.

- 11.1.4. Recognise that the welfare of all who take part in St John's College, regardless of their role, is important.
- 11.1.5. All who are affiliated to St John's College place the safety and well-being of all students at the centre of everything they do.
- 11.1.6. To ensure that they have been vetted against the Sexual Offences Register, Child Protection Register, and have completed a criminal Check in accordance with this policy.
- 11.1.7. St John's College is committed to implementing robust procedures to safeguard and protect all students including procedures to address the risks associated with specifically any vulnerable groups.

12. RECRUITMENT AND VETTING

12.1. Recruitment Policy

- 12.1.1. The school follows effective recruitment and selection procedures, including procuring references, one from the most recent employer/institution before finalising any appointment. The HOD or Line Manager is responsible for obtaining these references. Copies of references are to be sent to the HR Department.
- 12.1.2. All recruitment advertisements will have a safeguarding statement as part of the advertisement to inform all applicants of the schools commitment to safeguarding.
- 12.1.3. The school makes a note of its own assessment of the suitability of employees to work with students and of all adults on the premises.
- 12.1.4. Police clearance (and other legally required clearance in accordance with National Registers) for all employees and volunteers will be required before the commencement of the job and regularly updated.
- 12.1.5. All job applicants will be asked if they have allegations or convictions relating to the abuse of children. Regardless of the response, the National Registers will be checked.
- 12.1.6. Proof of membership of the South African Council of Educators (SACE) must be obtained by all academic staff.
- 12.1.7. For further information please refer to the Recruitment policy.

12.2. Police Clearance

- 12.2.1. The purpose of this policy is to ensure alignment to best Pre-Employment practice and further safeguarding. The purpose is to establish whether the person has a previous

conviction for any crime which may be construed as negatively aligned to the position that is being applied for.

- 12.2.2. It is the policy of St John's College that all persons working in any capacity, for a period of more than 5 days in a 3 month cycle, either as staff member or in any volunteer capacity, including, but not limited to teachers, coaching staff, volunteers, technical assistants, administrators, or service providers must obtain a criminal check, and that all staff, volunteers, or service providers have a certificate that is not older than 24 months.

12.3. Sexual Offenders Registry

- 12.3.1. It is the policy of St John's College that all adult persons working in any capacity, for a period of more than 5 days in a 3 months cycle, either in a staff or in a volunteer capacity, including, but not limited to teachers, coaching staff, volunteers, administrators or, service providers are cleared in the prescribed manner in accordance with Chapter 6 of the Sexual Offences Amendment Act 2007 and that they all have a certificate proving that the check has been conducted and that certificate is not older than 24 months and must be renewed every 24 months.

12.4. Child Protection Register Policy

- 12.4.1. The purpose of this policy is to ensure compliance with Section 126 of the Children's Act 38 of 2005. St John's College undertakes to ensure that all staff and volunteers working in any capacity, for a period of more than 5 days in a 3 month cycle, including, but not limited to teachers, coaching staff, volunteers, administrators or, service providers affiliated in any way to St John's College are cleared in accordance with the Act and that they all have a certificate proving that the check has been conducted and is no older than 24 months and must be renewed every 24 months.

13. REPORTING CONCERNS

13.1. Purpose

- 13.1.1. The purpose of this section is to ensure all employees and volunteers associated in any way with St John's College are aware of the reporting of abuse structures.
- 13.1.2. Furthermore, it strives to ensure that the threat of secondary abuse is reduced and the likelihood of a successful prosecution of the perpetrator is increased.
- 13.1.3. Any adult may contact the Department of Social Development (DSD) or the South African Police Services (SAPS) directly if they believe a child is at immediate risk.
- 13.1.4. Any staff member or volunteer who suspects child abuse must follow these steps outlined below for reporting the incident:

- 13.1.5. Any disclosure of child abuse must be reported as soon as possible to a St John's College DSO.
- 13.1.6. Any staff member or volunteer to whom a child or student makes the disclosure will immediately complete the form and submit it to the DSO within 24 hours of the disclosure being made.
- 13.1.7. If a child makes a disclosure, the person to whom the disclosure was made must report this to the DSO.
- 13.1.8. Under no circumstances may details of the abuse be divulged to any person other than the DSO unless the transference of this information will benefit the child directly.
- 13.1.9. The DSO undertakes to report all incidents of Child abuse to the SAPS.
- 13.1.10. Any person may contact The Guardian (the St John's College safeguarding partner) for telephonic advice.
- 13.2. Low-level concerns (Hunches)
 - 13.2.1. To promote a culture of early intervention, staff must report low-level concerns or hunches.
 - 13.2.2. This can be done through the Safeguarding internal website or on the "Hunch" forms.
 - 13.2.3. This allows the school to identify patterns and address issues before potential harm occurs.
- 13.3. Information to the Headmaster of St John's College
 - 13.3.1. The procedure for the distribution of child abuse information to St John's College is to be as follows:
 - 13.3.2. Any DSO who becomes aware of any harm to a child, which is either non-accidental or as a result of negligence, and whether the DSO receives the information directly or indirectly, must, within 24 hours of receiving the report, submit a report to St John's College Headmaster.
 - 13.3.3. If the DSO is of the opinion that disclosing the information to the Headmaster would adversely affect the well-being of the child or the investigation, the DSO must then choose another member of the School Executive Management Team or the school safeguarding partner to share the disclosure with.
 - 13.3.4. Any allegation or concern about a staff member's conduct must immediately be reported to the Headmaster of St John's College and the Designated Safeguarding Lead.
 - 13.3.5. The Head will conduct an immediate risk assessment and determine protective measures to be implemented.
 - 13.3.6. All allegations must be concluded through proper processes and, where required, reported to statutory authorities.

- 13.3.7. The alleged person will receive fair and transparent communication.
- 13.4. Guidelines for Managing Disclosure
 - 13.4.1. Stay calm and be reassuring.
 - 13.4.2. Find a quiet, but not necessarily private, place to talk.
 - 13.4.3. Ensure that the child knows that you believe what he or she is telling you.
 - 13.4.4. Listen, but do not press for information.
 - 13.4.5. Tell the child you are glad that he or she has told you.
 - 13.4.6. Never promise the child that you will keep their secret but promise to tell only those you really must.
 - 13.4.7. If it will help the child to cope, tell them that the abuser has a problem.
 - 13.4.8. Tell the child that you will do your best to protect and support him or her.
 - 13.4.9. If necessary, seek medical help and contact the police or social services.
 - 13.4.10. Acknowledge that the child may experience a range of feelings about the abuse such as anger, sadness, and guilt. It is important to stress that the abuse was and is not the child's fault.
 - 13.4.11. Acknowledge that you may need help dealing with your own feelings. If necessary, ask your DSO for assistance.
 - 13.4.12. Always remain objective and do not allow personal matters, feelings, or preconceptions to cloud your judgment.
 - 13.4.13. The reporting and investigation of child abuse must ensure the safety of the child.
- 13.5. Whistle blowers
 - 13.5.1. The St John's College Whistle Blowing Policy refers.
 - 13.5.2. Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistle-Blowing Procedure.
 - 13.5.3. For further information please refer to the Whistle Blowing Policy.
 - 13.5.4. Appropriate contact details for the following:
 - 13.5.4.1. The Guardian App
 - 13.5.4.2. The Designated Safeguarding Officers which are in Annexure A.
 - 13.5.4.3. Support channels, including the School psychologists and counsellors.
- 13.6. Communication
 - 13.6.1. The school communicates the Safeguarding Policy to students in a manner that is accessible and appropriate.
 - 13.6.2. Parents, students and others are informed about safeguarding as well as about procedures for reporting suspected abuse. The school is clear about its responsibility to protect students and makes this known to all who come into contact with St John's College.

14. GENERAL SAFEGUARDING

14.1. Introduction

- 14.1.1. St John's College is committed to the safety of all students with special attention to the rights of children which subscribes to the Constitutional Right, "The Rights of a Child are Paramount". By this concept, St John's College and all stakeholders, will, at all times, endeavour to safeguard students, not only from abuse, but also from anything else that may cause harm to a child physically and/or emotionally.

14.2. Personal Relationships

- 14.2.1. Under no circumstances is it acceptable for a member of staff to form a personal relationship with a student attending St John's College. This applies to all students, including those who are aged 16 and over (whether in Matric or the Sixth Form).

14.3. One-to-one work

- 14.3.1. Staff involved in working with students on a one-to-one basis should ensure that they are visible whenever possible, thus complying with the Line of Sight rule. This means using an open plan room or working in a room with the door open or a window in the door. Both parties should be comfortable with the arrangement for one-to-one work and parents should be aware that this is part of the provision at school. Under no circumstances should a student be allowed to enter the staff room or a staff common room. This will be regularly monitored by the Designated Safety Officers.

14.4. Offering a lift to a student

- 14.4.1. Transport arrangements should be made in advance by a designated member of staff. Wherever possible, and practicable, transport should be provided other than in private vehicles, with at least one adult additional to the driver acting as an escort. It should not be necessary, other than in exceptional circumstances where all other options have been exhausted, to give a lift to a young person. If this is the last option, the member of staff must liaise with a senior member of staff prior to offering a lift and must then be accompanied by a colleague with the young person seated in the back of the car. Parents of the young person must know about this arrangement and agree with it.

14.5. Protecting personal information

- 14.5.1. Staff who have a social networking account must not have students as 'friends' as this may allow access to personal information. Equally, staff must be cautious and prudent in their settings on social networking sites to avoid undue personal information being sourced.

14.6. Power and positions of trust

14.6.1. All adults working with children and young people are in a position of trust, as a consequence of their knowledge, position and/or the authority invested in their role, and this equally applies to adults who act in a voluntary capacity.

14.6.2. This means that adults should:

- 14.6.2.1. ensure that an unequal balance of power is not used for personal advantage or gratification;
- 14.6.2.2. maintain appropriate professional boundaries and avoid behaviour which might be reasonably misinterpreted by others;
- 14.6.2.3. report and record any incident where their behaviour may be misinterpreted with a senior manager at the earliest opportunity.

14.6.3. This means that adults should not:

- 14.6.3.1. use their position to gain access to information for their own or others' advantage;
- 14.6.3.2. use their position to intimidate, bully, humiliate, threaten, coerce or undermine children or young people; or
- 14.6.3.3. use their status and standing to form or promote relationships which are of a sexual nature, or which may become so.

14.7. Physical Contact

14.7.1. Many jobs within the children's workforce require physical contact (including personal care) with children as a part of their role. However, it is crucial that adults only touch children in ways which are appropriate to their professional or agreed role and responsibilities. Not all children and young people feel comfortable about physical contact, and adults should not assume that it is acceptable practice to use touch as a means of communication.

14.7.2. This means that adults should:

- 14.7.2.1. be familiar with and follow any recommended guidance and protocols;
- 14.7.2.2. treat children with dignity and respect;
- 14.7.2.3. always explain to a child the reason why contact is necessary and what form that contact will take; (especially important when physical intervention to manage a child's behaviour is required);
- 14.7.2.4. be aware that even well-intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described;
- 14.7.2.5. never touch a child in a way that may be considered to be indecent;
- 14.7.2.6. always be prepared to report and explain actions and accept that all physical contact is open to scrutiny;

- 14.7.2.7. not indulge in horseplay;
- 14.7.2.8. work within Health and Safety regulations;
- 14.7.2.9. be aware of gender, cultural and religious views about touching; and
- 14.7.2.10. understand that physical contact in some circumstances can be easily misinterpreted.

14.8. What about other physical contact with students?

- 14.8.1. It is not illegal to touch a student. There are occasions when physical contact, with a student, is proper and necessary.
- 14.8.2. Examples of where touching a student might be proper or necessary, permission for physical contact should be requested by the teacher:
 - 14.8.2.1. When comforting a distressed student;
 - 14.8.2.2. When a student is being congratulated or praised;
 - 14.8.2.3. To demonstrate how to use a musical instrument;
 - 14.8.2.4. To give first aid;
 - 14.8.2.5. To demonstrate exercises or techniques during PE lessons or sports coaching; and
 - 14.8.2.6. If the developmental or physical capabilities of the child require support to perform an activity safely.

15. ACCESS TO SUPPORT AND INFORMATION

- 15.1. St John's College will ensure access to support and information to anyone who discloses abuse, who alleges that abuse has taken place or who is alleged to have perpetrated abuse. The school is aware of how distressing abuse is and the difficulties associated therewith: the school will make sure that anyone affected by abuse will know where they can go to receive help and advice.
- 15.2. Such support mechanisms include:
 - 15.2.1. Appropriate pastoral care is available
 - 15.2.2. Information about sources of support is available.
 - 15.2.3. There is a procedure (section 10 of this policy) for responding to safeguarding suspicion, concerns, knowledge of allegations and a timeframe for dealing with them.
 - 15.2.4. Support of anyone who discloses abuse or who alleges that abuse has taken place. This will be offered by the school management as appropriate.
 - 15.2.5. Support of someone who is alleged to have perpetrated abuse involves informing the potential abuser that they have a right to seek legal advice.

16. RECORD KEEPING

16.1. St John's staff are to ensure:

- 16.1.1. that an accurate record of the investigation and outcome is retained and securely stored, and documenting the process followed by the School in dealing with the incident, including any decision not to report the incident.
- 16.1.2. A written record must be made of all safeguarding concerns, disclosures, body maps (if required), decisions taken and actions implemented.
- 16.1.3. Records are stored securely and separately from academic files, with restricted access only to authorised safeguarding personnel.
- 16.1.4. Safeguarding information may be shared internally on a strictly needs-basis for the protection of students.
- 16.1.5. Under POPIA, information may be shared with external agencies (DSD, SAPS, SACE, medical professionals) where necessary to protect the student from harm and act in the student's best interests.

17. TRAINING AND SUPPORT

17.1. St John's College staff and volunteers will ensure that those who work with students in the sphere of safeguarding are trained and supported in all aspects of safeguarding relevant to their role, in order to develop and maintain the necessary knowledge, attitudes and skills to safeguard children.

17.2. These measures include:

- 17.2.1. All members of staff have electronically agreed to have "read and understood" and, thus, acknowledged the Safeguarding Policy.
- 17.2.2. Appropriate training to ensure an understanding of the legal obligations and legislation addressing child protection issues and sexual offences, particularly involving minors.
- 17.2.3. All staff to undergo safeguarding training every two years. DSO's to undergo training every year.
- 17.2.4. All existing and new Council members to receive safeguarding awareness training aligned with their oversight responsibilities.
- 17.2.5. Safeguarding supervision will be provided to DSO's and relevant staff supporting high-risk students.
- 17.2.6. All staff are given the opportunity to learn about how to recognise and respond to concerns about abuse.
- 17.2.7. St John's College annually identifies those who need training.

- 17.2.8. St John's College keeps a clear record of training, outlining the topic of the training and when it was attended and by whom.
- 17.2.9. The school's budget allows for training to take place.
- 17.2.10. Child protection issues and safeguarding measures available within the school.
- 17.2.11. Support structures and avenues for students to raise their concerns and ventilate any safeguarding concerns and issues.
- 17.2.12. This will also be age-specific and sensitive to the different relationships and social dynamics.

18. REVIEW

- 18.1. This policy will be reviewed annually to ensure alignment with evolving best practice, legal requirements, and school needs.
- 18.2. The Safeguarding Forum will monitor trends in concerns, vetting compliance, training completion, case management and implementation of this policy.
- 18.3. An annual safeguarding report will be made to Council summarising cases (without identifying information), emerging risks, training delivered, improvements made and resource needs.
- 18.4. The College may commission periodic external safeguarding audits to strengthen practice and culture.

19. ANNEXURE 1

DESIGNATED SAFEGUARDING OFFICERS (DSO)

SCHOOL	NAME AND SURNAME
Safeguarding Coordinator	Jonathan Gunning
ST JOHN'S COLLEGE	Thapelo Masemola Matthew Wright
THE BRIDGE	Pamela Hayward Judy Innes
PRE-PREPARATORY	Tucha Elliot
PREPARATORY	Mike MacFarlane Khwezi Mqomboti
COLLEGE	Martin Huysamer Alan Lion Cachet Dion Libera
SIXTH FORM	Nadine de Reuck Jarryd Kuiper
ACADEMY PREP ACADEMY	Mickey Mashego Sizi Botsime
AFTERCARE	Tammy Steele

20. ANNEXURE 2

DISCLOSURE FORM

Purpose

Can be completed by a member of staff if they wish, to record a disclosure made to them by a student.

Remember:

- ask "open" questions and not leading questions, that is, a question which suggests its own answer
- listen carefully and keep an open mind
- do not take a decision as to whether or not the alleged abuse or neglect has taken place.

Date	
Time	
Place	
Member of staff present and position	
Full name of student	
Grade	

Ask the child to explain their concern or allegation and record details of the matter in the space below. Use a separate sheet if necessary and then attach it to the form.

A non-exhaustive list of the details to be included:

- what was said or done, by whom, to whom and in whose presence
- when the incident took place and where
- whether the child wishes their parents [or legal guardian] to be informed.

Any additional comments or evidence

Details may include, for example, any concerns you may have.

Please also include a note of any other evidence, for example, written notes, items of clothing or mobile phone messages relating to the matter.

Signed by:

Print name:

Date:

21. ANNEXURE 3

SIGNS OF GROOMING

The signs of grooming are not always obvious. Groomers will go to great lengths not to be identified. Some actions associated with those grooming children in schools may include:

- meeting pupils secretly, or without seeking authorisation from Housemasters or Form teachers.
- collusive behaviours designed to cultivate dependency, such as:
 - o unprofessional conversations about other members of staff;
 - o breaking School Rules over providing students with alcohol; and
 - o 'friending' students on social media platforms, contrary to school policy.

Students who are being groomed at school or elsewhere may:

- be very secretive, including about what they are doing online
- have unexplained absences
- have older friends
- go to unusual places to meet friends
- have new belongings such as clothes or mobile phones that they can't or won't explain
- have access to drugs and alcohol

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age may be observed.