



CHILD SAFEGUARDING POLICY (2026)

1. DOCUMENT CONTROL

Policy Owner	Board of Governors
Drafted By	SMT and Board of Governors
Date of Approval	02 June 2026
Review Date	May 2027
Related Policies	Recruitment & Vetting Policy (2026); Anti-Bullying & Harassment Policy (2026); Pastoral Care Policy (2026); SHE & Crisis Management Policy (2026); Data Management & POPIA Compliance Policy (2026); Substance Abuse Policy (2026).

2. PREAMBLE & ETHOS

The protection of children is the first duty of every Catholic school. It is prior to academic achievement, prior to institutional reputation, and prior to the comfort of adults. This is not a policy created to satisfy a regulatory requirement. It is a statement of who we are.

Loreto Convent School is rooted in the Catholic understanding of *Imago Dei* — that every child is made in the image of God, possessed of inherent dignity, and entitled to grow up safe. Mary Ward gave her life to the education and protection of the young. The safeguarding of children is the most direct expression of her charism that this school can offer.

Guided by the charism of Mary Ward and by the SACBC's *Integrity in Ministry* framework, this policy is anchored in:

- **Justice:** Every child has the right to be safe. Every adult in this school has the duty to protect that right — not to protect the institution, not to protect a colleague, but to protect the child. When these obligations conflict, the child's safety prevails without exception.
- **Truth:** We do not deny, minimise, or conceal abuse. When a child discloses harm, we believe them. When a report is made, we investigate. When the evidence requires it, we report to the authorities. The truth that a child has been harmed is never subordinated to the reputation of the school or the status of the person accused.
- **Sincerity:** We are transparent with families, with the Catholic Schools' Trust, and with the relevant authorities about our safeguarding practices. We do not perform compliance; we practise protection.
- **Freedom:** A child who is unsafe cannot learn. A child who is afraid of an adult in a position of trust over them has had their freedom violated in the most profound way. This policy exists to ensure that every learner at Loreto Convent School is free — free to grow, to learn, and to trust the adults around them.

- **Accompaniment:** When a child has been harmed, or is at risk of harm, we do not leave them to navigate the consequences alone. We walk alongside the child and their family with care, patience, and commitment to their healing. Safeguarding is an act of accompaniment, not only an act of reporting.
- **Excellence:** Our safeguarding practice is not the minimum required by law. It is maintained to the highest standard we can achieve, reviewed annually, and continuously improved. We train our staff, update our procedures, and hold ourselves accountable because our learners deserve nothing less.

3. LEGISLATIVE & CHURCH AUTHORITY FRAMEWORK

3.1. South African Law

- *Constitution of the Republic of South Africa, 1996 — Section 28 (Rights of the Child, including the right to be protected from maltreatment, neglect, abuse, and degradation).*
- *Children's Act 38 of 2005 — the primary child protection statute. Section 110: mandatory reporting of abuse or neglect to a designated child protection organisation or the South African Police Service. Section 120: prohibition on employing persons listed on the National Child Protection Register (NCPR).*
- *Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007 — Section 54: mandatory reporting of sexual offences against or involving children. Section 52: obligation to report knowledge of sexual offences against children.*
- *South African Schools Act 84 of 1996 (SASA) — including the duty of care in loco parentis.*
- *Protection of Personal Information Act (POPIA), Act 4 of 2013 — safeguarding records as Special Personal Information.*

3.2. Church Authority Framework

- *Southern African Catholic Bishops' Conference (SACBC):* The SACBC has issued protocols governing the Church's response to allegations of abuse by Church personnel. This school operates within the SACBC diocesan framework and implements its safeguarding protocols.
- *Integrity in Ministry (SACBC, 2012, revised):* The Church's governing document for the protection of children and vulnerable adults in all Catholic institutions. This policy is read in conjunction with and is subordinate to *Integrity in Ministry*.
- *Catholic Schools' Trust:* The Trust requires that this Child Safeguarding Policy be adopted and implemented. The Trust Representative on the Board is responsible for ensuring the Trust receives copies of any safeguarding reports as required.

4. SCOPE

This policy applies to:

- All learners enrolled at Loreto Convent School, from Grade RRR to Grade 12.
- All staff — teaching, non-teaching, administrative, and support staff — whether permanent, temporary, part-time, or casual.

- All volunteers, coaches, and co-curricular activity providers operating on school premises or in school-sanctioned activities.
- All contractors and service providers who have contact with learners on school premises.
- All visitors to the school campus.

The duties and obligations in this policy are not limited to harm occurring on school premises. They extend to harm identified or disclosed in any context where the school has a relationship of care with the child.

5. DEFINITIONS

"Child": Any person under the age of 18, as defined in s1 of the Children's Act 38 of 2005.

"Abuse": Any form of harm inflicted on a child, including physical abuse, emotional abuse, sexual abuse, and neglect. A single severe incident is sufficient to constitute abuse — repetition is not required.

"Physical abuse": Any deliberate act causing physical injury or pain, including hitting, shaking, burning, or any other form of physical harm.

"Emotional abuse": Persistent or severe emotional ill-treatment causing significant and lasting harm to a child's emotional development. Includes humiliation, rejection, threats, and age-inappropriate expectations.

"Sexual abuse": Any unwanted or non-consensual sexual act or behaviour involving a child, including contact and non-contact offences and the production or sharing of sexual images of children.

"Neglect": The persistent failure to meet a child's basic physical, emotional, or educational needs, causing significant harm.

"Grooming": Any behaviour by an adult that is intended to build trust with a child (or their family) in order to facilitate future abuse, whether physical, emotional, or sexual.

"Designated Safeguarding Officer" (DSO): The staff member designated by the Board as the school's primary safeguarding officer. The DSO is the Executive Principal unless the Board formally designates another senior staff member.

"Mandatory reporter": Under the Children's Act s110 and the Criminal Law (Sexual Offences) Amendment Act s54, any person who has reason to believe a child has been or is being abused, sexually abused, or neglected is legally required to report this to the relevant authorities. This obligation applies to every adult at this school without exception.

6. MANDATORY REPORTING OBLIGATION

STATUTORY OBLIGATION — NOT DISCRETIONARY: In terms of Section 110 of the Children's Act 38 of 2005 and Section 54 of the Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007, every person who has reason to believe that a child is or has been abused, sexually abused, or neglected **must** report this to a designated child protection organisation or the South African Police Service (SAPS). This obligation: (a) applies to every staff member, volunteer, and contractor at this school; (b) cannot be overridden by the Executive Principal, the Board, or any other authority; (c) applies even if the alleged perpetrator is a colleague, a Board member, a parent, or a Church official; and (d) applies regardless of whether an internal investigation has been initiated or completed. Failure to report is a criminal offence.

Every staff member at this school is a mandatory reporter under South African law. This is not delegable. A staff member who becomes aware of abuse or neglect may not defer to a supervisor and consider their duty discharged; they must ensure that a report is made and, if in doubt about whether their supervisor has acted, they have the right and the duty to report directly.

7. ROLES & RESPONSIBILITIES

7.1. The Board of Governors

- Ultimate accountability for the school's child safeguarding framework rests with the Board.
- The Board appoints the Designated Safeguarding Officer and ensures this role is always filled.
- The Board reviews this policy annually and approves any amendments.
- The Board ensures that all staff receive safeguarding training appropriate to their role and that training records are maintained.
- The Board Chairperson is notified immediately of any safeguarding incident that results in a report to SAPS or a child protection organisation.

7.2. The Designated Safeguarding Officer (DSO)

- The DSO is the single point of accountability for safeguarding at the school.
- The DSO receives and triages all safeguarding concerns and reports.
- The DSO makes decisions about reporting to SAPS or child protection organisations and ensures those reports are made promptly.
- The DSO maintains the confidential Safeguarding Register.
- The DSO co-ordinates the school's response to safeguarding incidents, including support for the affected learner and management of any related staff matter.
- The DSO liaises with the Board Chairperson and the Catholic Schools' Trust Representative on all serious safeguarding matters.
- Where the alleged perpetrator is a staff member, the DSO immediately reports to the Board Chairperson and the Trust Representative before taking any further internal action.
- A Deputy DSO (Executive Principal) will assume all DSO responsibilities when the DSO is unavailable.

7.3. All Staff (including volunteers, coaches, and contractors)

- Every adult working at this school is responsible for the safety of the learners in their care.
- Every staff member must read and acknowledge this policy annually.
- Every staff member must complete the school's safeguarding induction training, and refresher training annually thereafter.
- Every staff member must report any concern, observation, or disclosure to the DSO **immediately**, without conducting their own investigation.
- No staff member may promise a child confidentiality. If a child begins to disclose and says "You must promise not to tell anyone," the staff member must say: "I care about you and I want to help you. If I am worried about your safety, I may need to share what you tell me with someone who can help."

8. SAFE RECRUITMENT

Every appointment at this school is a safeguarding decision. The Recruitment & Vetting Policy (2026) governs the full safe recruitment process. The following minimum requirements apply to every appointment without exception:

- **NCPR check:** Verification against the National Child Protection Register. No person listed as unsuitable to work with children may be employed in any capacity involving contact with children. This is a criminal prohibition under s120 of the Children's Act.
- **Sex Offender Register:** Verification against the National Register for Sex Offenders.
- **Police Clearance:** A recent (less than 6 months) police clearance certificate.
- **SACE Registration:** Valid SACE registration for all teaching staff.
- **Reference checks:** A minimum of two professional reference checks, with at least one being the most recent employer.
- **No waiver:** No appointment may proceed on the basis of a pending or provisional clearance. No waiver of any vetting requirement is permitted under any circumstances, regardless of urgency or seniority.

9. RECOGNISING HARM

Every staff member has a responsibility to be alert to signs that a child may be experiencing harm. The following table sets out possible indicators. This list is not exhaustive; the presence of one indicator does not confirm abuse, and the absence of indicators does not confirm safety. Staff are trained to trust their professional instinct and to report any concern without waiting for certainty.

Type of Harm	Possible indicators (non-exhaustive)
Physical Abuse	Unexplained injuries, bruising, burns, or fractures; injuries inconsistent with explanation; flinching at physical contact; wearing concealing clothing in warm weather.
Emotional Abuse	Persistent low self-esteem, anxiety, or withdrawal; extreme behaviour (aggression or passivity); delayed emotional development; fear of making mistakes.

Sexual Abuse	Age-inappropriate sexual knowledge or behaviour; unexplained physical symptoms; withdrawal, nightmares, or self-harm; reluctance to undress for sport; grooming behaviour by an adult.
Neglect	Persistent hunger, poor hygiene, or inappropriate dress; fatigue and difficulty concentrating; untreated medical conditions; frequent absence from school.
Domestic Violence	Distress around home-related conversations; aggression or extreme passivity; signs of trauma; disclosure of violence in the home.
Online/Digital Harm	Distress after using a device; secretive online behaviour; withdrawal from friends; receipt of unexplained gifts; grooming language from unknown adults.

Staff must also be alert to **grooming behaviour** by adults toward learners — excessive one-to-one attention, gift-giving, special treatment, boundary-testing, or deliberate isolation of a learner from peers or other staff. Grooming by a colleague or contractor is a safeguarding concern requiring immediate referral to the DSO regardless of whether abuse has yet occurred.

10. RESPONDING TO A DISCLOSURE

When a learner discloses harm — or when a staff member has reason to believe a child is at risk — the following applies:

10.1. What to do

- 1) Stay calm. Do not show shock or distress. Your composure allows the child to feel safe.
- 2) Listen actively. Give the child your full attention. Do not rush them.
- 3) Use the child's words. Do not rephrase, interpret, or suggest. Ask only open questions if clarification is genuinely needed: "Can you tell me more about that?"
- 4) Reassure the child. Tell them they have done the right thing by telling you. Do not make promises you cannot keep about outcomes.
- 5) Record accurately. As soon as possible after the conversation, write down exactly what the child said and what you observed, using the child's own words. Note the date, time, and location. Do not edit or interpret.
- 6) Report immediately. Take your notes to the DSO without delay. Do not discuss the disclosure with colleagues, parents, or the alleged perpetrator.

10.2. What not to do

- 1) Do not promise the child you will keep the information secret.
- 2) Do not conduct your own investigation or interview the child extensively.
- 3) Do not confront or alert the alleged perpetrator.
- 4) Do not contact the child's parents if the alleged perpetrator is a family member, until advised to do so by the DSO and, where applicable, SAPS.
- 5) Do not delay reporting because you are unsure or because you think the matter may resolve itself.

11. THE DSO RESPONSE PROCESS

- 1) **Receive:** The DSO receives the staff member's written report. The DSO records the report in the confidential Safeguarding Register immediately.
- 2) **Assess:** The DSO assesses whether the concern constitutes reasonable grounds for a mandatory report under s110 of the Children's Act or s54 of the Sexual Offences Act. The test is reasonable belief, not certainty. When in doubt, the DSO reports.
- 3) **Report:** If the threshold is met, the DSO reports to SAPS and/or the relevant designated child protection organisation without delay. The DSO records the date, time, and reference number of the report in the Safeguarding Register.
- 4) **Notify:** The DSO notifies the Board Chairperson of any report made to SAPS or a child protection organisation within 24 hours. The Trust Representative is notified concurrently. The notification complies with the 48-hour requirement in s31.3 of the Constitution of the School.
- 5) **Protect:** The DSO takes all necessary steps to protect the child's safety during the process. Where the alleged perpetrator is a staff member, the DSO immediately suspends the staff member from any contact with learners pending investigation, in consultation with the Executive Principal and the Board Chairperson. Precautionary suspension is not a finding of guilt.
- 6) **Support:** The DSO co-ordinates pastoral support for the affected learner through the School Counsellor. Support is maintained throughout the investigation and beyond. Refer to the Pastoral Care Policy (2026) for the full pastoral support framework.
- 7) **Cooperate:** The school fully cooperates with SAPS, the Department of Social Development, the SACBC, and any other relevant authority in any investigation. No member of staff may obstruct, withhold evidence from, or interfere with an investigation.

12. ALLEGATIONS AGAINST STAFF

An allegation that a staff member has abused, harassed, or behaved inappropriately toward a learner requires an immediate and carefully managed response that protects both the child and the rights of the accused.

- 1) **Immediate action:** The DSO immediately removes the accused staff member from any contact with learners. This is a precautionary measure and does not constitute a finding of guilt.
- 2) **Board notification:** The Board Chairperson is notified within 2 hours. The Trust Representative is notified concurrently.
- 3) **External report:** If the allegation involves conduct that meets the mandatory reporting threshold, the DSO reports to SAPS before taking any further internal action. The internal process does not substitute for the statutory report.
- 4) **Suspension:** The Board considers precautionary suspension of the staff member on full pay pending investigation, in accordance with the Staff Code of Conduct & Disciplinary Policy (2026). Precautionary suspension is not a finding of guilt and does not prejudice the outcome.
- 5) **SACE referral:** Allegations involving SACE-registered staff are referred to SACE for parallel proceedings in terms of the SACE Act 31 of 2000 and the SACE Code of Professional Ethics.

- 6) **NCPR listing:** Where a staff member is found guilty of an offence involving a child, the school is obliged to apply for the person to be listed on the National Child Protection Register as unsuitable to work with children, in terms of s120 of the Children's Act.
- 7) **No parallel internal process:** Where criminal proceedings are initiated, the school does not run a parallel internal disciplinary process on the same facts until the criminal process is resolved, except where the safety of learners requires immediate action.

13. CODE OF CONDUCT FOR ADULTS

All staff and volunteers are required to observe the following at all times. These are not aspirational guidelines; they are enforceable conduct standards.

13.1. Physical Contact

- Physical contact between staff and learners must be appropriate to the educational context, never secretive, and must always be in a space where it is visible to others.
- No staff member may conduct a strip search of a learner under any circumstances.
- Physical restraint may only be used where strictly necessary to prevent immediate harm to the learner or others, and must be reported to the DSO and parents immediately.

13.2. Private Communication

- No staff member may communicate inappropriately with a current learner via personal social media, personal email, or personal phone. All communication with learners is via school-sanctioned platforms.
- No staff member (other than the counsellor) may meet with a learner one-on-one in a space that is not visible to others.

13.3. Gifts and Special Relationships

- No staff member may give personal gifts to individual learners or receive gifts from learners that could create a special or exclusive relationship.
- No staff member may take a learner to their home or to any private space, or transport a learner alone in a private vehicle except in a documented emergency.

13.4. Digital Conduct

- The Social Media & Digital Citizenship Policy (2026) applies in full. Staff may not follow or connect with current learners on personal social media accounts under any circumstances.

14.CONFIDENTIALITY & DATA PRIVACY

All safeguarding records — disclosures, reports, investigation records, and outcomes — are Special Personal Information under POPIA (Act 4 of 2013) and are governed by the Data Management & POPIA Compliance Policy (2026).

- 1) **Access:** Accessible only to the DSO, Principal, the Board Chairperson, and the Trust Representative where the Trust is notified. Not shared with any other staff.
- 2) **Confidentiality is not secrecy:** Confidentiality means information is shared only with those who need it to protect the child. It does not mean information is withheld from the authorities. The statutory reporting obligation always overrides confidentiality.
- 3) **Retention:** Safeguarding records are retained for a minimum of 25 years from the date of the last entry, or until the child turns 25, whichever is later. This exceptionally long retention period reflects the particular gravity of safeguarding records and the possibility of future criminal proceedings.
- 4) **The Safeguarding Register:** A confidential log maintained by the DSO, recording the date and nature of every concern received, the action taken, and the outcome. The Register is stored in a locked location accessible only to the DSO, Executive Principal and the Board Chairperson.

15.TRAINING & ANNUAL REVIEW

- 1) **Induction training:** All new staff complete safeguarding induction training before working with learners. This training covers: recognition of abuse and neglect; mandatory reporting obligations; the school's response procedures; and the codes of conduct for adults.
- 2) **Annual refresher:** All staff complete annual safeguarding refresher training. Training records are maintained by the DSO and reported to the Board annually.
- 3) **Annual policy review:** This policy is reviewed annually by the Board. The review considers: the School's safeguarding incidents during the year; any changes to legislation or SACBC protocols; and any recommendations from SAPS, child protection organisations, or the Catholic Schools' Trust.
- 4) **Board annual report:** The DSO provides the Board with an annual safeguarding report at the start of each academic year, covering the previous year's concerns, reports, outcomes, and training completion rates. The report is presented to the Trust Representative concurrently.

16.APPROVAL

This policy has been adopted by the Board of Governors of Loreto Convent School in accordance with the requirements of the South African Schools Act 84 of 1996, the Children's Act 38 of 2005, the SACBC *Integrity in Ministry* framework, and the Catholic Schools' Trust Constitution. It supersedes all previous safeguarding policies of the school.

All staff acknowledge receipt of this policy by signing the Annual Staff Safeguarding Acknowledgement Form (Annexure A).

Signed on behalf of the Board of Governors:



02 June 2026

Date: _____

Fatima Rawjee

Chairperson: Board of Governors

Signed by the Executive Principal:



02 June 2026

Date: _____

Suzette Truter

Executive Principal

ANNEXURE A: ANNUAL STAFF SAFEGUARDING ACKNOWLEDGEMENT

I, _____ (full name),

in the role of _____,

confirm that I have read and understood the Loreto Convent School Child Safeguarding Policy (2026).
I understand:

- My mandatory reporting obligations under Section 110 of the Children's Act 38 of 2005 and Section 54 of the Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007.
- The procedure for reporting a concern or disclosure to the Designated Safeguarding Officer.
- The codes of conduct for adults set out in Section 13 of this policy.
- That failure to comply with this policy, including failure to report a safeguarding concern, may result in disciplinary action and may constitute a criminal offence.

Signed: _____ Date: _____

(Please return to the Executive Principal's office for inclusion in your personnel file.)