



UCT ONLINE
HIGH SCHOOL

POLICIES

SAFEGUARDING OF CHILDREN POLICY



OVERVIEW

Purpose	This Policy outlines UCT Online High School's approach to the safeguarding of learners of the school.
Custodian	Head of Well-Being and Engagement
Approval Authorities	Chief Academic Officer
Version History	Version 6 , Effective 1 January 2026



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1. Introduction

This Policy has been developed by UCT Online High School, in collaboration with Valentre Institute.

UCT Online High School has adopted this Safeguarding of Children Policy ("Policy"), and as part of this Policy, we have defined a set of processes to follow when anyone has concerns about the safety of learners, as well as guidelines on related issues. This Policy is global in scope and covers all learners who receive a service from UCT Online High School, in collaboration with Valentre Institute.

For the purposes of this Policy, the 'safeguarding coordinator' refers to the Head of Well-Being and Engagement.

2. Key objectives

- a. Our primary consideration is to ensure that no learner is at risk of abuse or is harmed.
- b. Our key objectives are:
 - Do all that we can to ensure that learners are not at risk of abuse when participating in the various environments of UCT Online High School.
 - Identify potential risks to learners when participating in an online learning environment such as cyberbullying, and create and implement appropriate and effective guidelines for such engagement, as well as processes to monitor and prevent or address any incidents in the online environment utilised by UCT Online High School.
 - Do all that we can to ensure that all learners are free from all types of abuse and harassment, including sexual harassment while participating in the various environments of UCT Online High School, or while



receiving a service from us – whether the harassment is from team members, fellow learners, or contractors.

- Recognise and take appropriate action when a young person or vulnerable adult might have been abused, including in the community or family.
- Create a safe space for learners, parents / guardians, and team members to address safety concerns.

c. To meet our objectives, we commit to:

- Comply with all relevant laws and regulations applicable in the Republic of South Africa including international law (i.e treaties).
- Set overarching principles to help team members think about our safeguarding responsibilities.
- Define processes and provide guidance on the safeguarding standards that we expect in all interactions related to UCT Online High School, and the actions that should be taken to avoid risk and to respond to cases of abuse.
- Communicate this policy and guidelines to our team members, contractors, parents / guardians, and others who may be interested in our approach to safeguarding.
- Ensure that learner facing team members are offered training to build their skills in preventing, identifying, responding to, and reporting cases of harm.
- Monitor and document performance, and apply any learning from these safeguarding principles.
- Report all incidents to the relevant authorities and officers.



3. Safeguarding principles

- a. The best interests of the learner are paramount and shall be the primary consideration in our decision-making.
- b. We are learner-centred and have adopted a rights-based approach. This helps us keep the rights (to care for, to nurture, and to ensure the equality of protection) of learners sharply in focus in all our activities.
- c. Equality of protection to ensure that learners have the same positive opportunity to engage in our activities safely, regardless of their gender, ability, race, sexuality, ethnicity, religion, circumstances, age, or any analogous ground. Vulnerable young people and adults require attention to optimise their safety needs and promote their access to important opportunities.
- d. We take responsibility to meet our obligations regarding our duty of care to all our learners. This means ensuring our products and services are safe and that we protect young people and vulnerable adults across all our activities, environments, and facilities.
- e. We reject the use of child or forced labour in our educational activities and in our business relationships.
- f. We make our standards to contractors and suppliers clear, and audit those that we identify as being high risk.
- g. We recognise and acknowledge that an element of risk can exist in many learning situations, and while we may never be able to eliminate this completely, we will do all we can to reduce or limit its impact.
- h. We are honest and transparent in our approach, and publicly disclose both this Policy and the way we work to try and protect all our learners.



- i. We have a separate policy on the protection of personal information (Privacy Policy). In general, except where there is an apparent immediate threat to life or limb, all personally identifiable information concerning learners should only be shared and handled on a need to know basis, in compliance with applicable laws, or where we have the express consent of the data subject for the nominated purpose. Access to the information must be necessary for the conduct of a role relevant to UCT Online High School. Only individuals who have legitimate reasons to access the information can receive it.
- j. We support and train those working within UCT Online High School to recognise and respond to learner and parent / guardian concerns, and concerns in relation to protection risks and incidences. We actively engage and educate learners and parents / guardians on issues relating to safeguarding, and emphasise risks and safety measures that apply in an online learning environment.
- k. We have dedicated persons assigned to take responsibility for the protection of learners in their engagement with us.
- l. We work with others to protect our learners, including law enforcement or child welfare agencies, where necessary. We require incidents relevant to this Policy in respect of all learners to be reported in a timely way, both internally and to the appropriate authorities, linked to proper recording of the relevant details.
- m. Independent monitoring of the implementation of the Policy is important to us, and we will share our Policy with all relevant people and agencies.



4. Child abuse

- a. Child abuse, in the context of learners under the age of 18, is a form of maltreatment of a child. A child can be abused or neglected by someone (whether that be an adult(s) or child(ren)) either inflicting, or failing to act to prevent harm.
- b. Children may be abused in a family, or in an institutional or community setting, by those known to them or, more rarely, by others, and more recently, via the internet.
- c. Child abuse is physical abuse, sexual abuse, neglect or emotional abuse.
 - Physical abuse arises from any form of injury that is not accidental, such as; throwing, hitting, burning, drowning, strangling, suffocating *inter alia*, or otherwise intentionally causing physical harm.
 - Sexual abuse involves forcing, enticing, or encouraging a person to take part in sexual activities, regardless of whether they are aware of what is happening or give their consent.
 - Emotional or psychological abuse arises from communicating in ways that belittles the person, or in ways that suggest the person is worthless, inadequate, unloved, or valued only insofar as they meet the needs of another person. It can also involve expectations that are inappropriate for the person's age or development, or communications that threaten or make the person feel in danger.
 - Neglect results from inadequate care or supervision, placing a person in a harmful situation that is otherwise avoidable, such as due to a lack of safety, warmth, medical attention, or nutrition.



- Financial exploitation or abuse occurs through the improper or unauthorised use of the resources of a person for profit or gain.
- Bullying is an intentional aggressive act that causes or threatens harm to others, and may involve verbal harassment, verbal or non-verbal threats, physical assault, stalking, manipulation, blackmail, or extortion.

5. Duty to report child abuse

- a. In accordance with South African legislation, including the Children's Act 38 of 2005, all staff members have a legal obligation to report any suspected or disclosed child abuse to the appropriate authorities. Should information regarding potential abuse come to our attention—whether disclosed by a learner, another learner, or a parent/guardian—the School Counsellor or Head of Well-being and Engagement will first meet privately with the learner to compile an incident report in a sensitive and supportive manner.
- b. Where the parent or guardian is identified as the alleged perpetrator, they will *not* be informed of the disclosure or report, as doing so may place the learner at further risk. If the parent or guardian is *not* implicated, they will be informed of the concern and of the school's duty to report.
- c. In line with South African law, learners aged 12 years and older can consent to their own treatment (or their child's) if they're mature enough to grasp the benefits, risks, and implications. While we respect this right to confidential support, the school prioritises the best interests of the learner and will involve parents or guardians whenever it is deemed safe and beneficial to do so.



6. Emergency Medical Care

The safety and well-being of our learners is a priority. We remain committed to act swiftly and call for emergency assistance whenever a learner's life is at risk and where it is required.

However, the financial responsibility for emergency medical services, including ambulance transport costs, rests solely with the learner's primary guardian. The payment arrangement is directly between the family and the medical facility. The school is not able to fund these expenses.

7. Safeguarding processes implemented by UCT Online High School

7.1 Learner Code of Conduct

- a. Learners are required to strictly comply with UCT Online High School's Learner Code of Conduct, which sets out the principles, standards, and rules applicable to their engagement with, and related to, UCT Online High School.
- b. The Learner Code of Conduct is strictly enforced by UCT Online High School, and the codes clearly set out the recourse that may be applied by UCT Online High School, where the codes are breached.

7.2 Participation in the online environment

- a. UCT Online High School's predominant manner of engagement with learners is in an online environment, referred to as the Online Campus.
- b. The nature of the Online Campus requires learners and team members to engage with one another in various situations, which include both



individual and group education, as well as tutorial sessions and discussion forums.

- c. Discussion forums are closely monitored and live sessions are always facilitated by faculty and learner support team members of UCT Online High School.
- d. The online safety education initiative provided by UCT Online High School is aimed at educating learners and parents / guardians on understanding how to stay safe and behave online.
- e. Our online safety measures and education broadly focus on the following categories that may pose risk:
 - Content: Exposure to illegal, inappropriate, or harmful material, such as pornography, fake news, racist, or radical and extremist views.
 - Contact: Being subjected to harmful online interaction with other users, such as commercial advertising, as well as adults posing as children or young adults.
 - Conduct: Personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images, or online bullying.

7.3 Anti-bullying

- a. Bullying is an ongoing and deliberate misuse of power in relationships through repeated physical, verbal, and / or social behaviour, with the intention to cause physical, psychological, and / or social harm, and is a form of abuse. It can involve an individual or a group misusing their power, or perceived power, over one or more persons who feel unable to stop it from



happening. Bullying can happen in person or online, it can be obvious or hidden, and it can happen over time and repetitively. Bullying of any form or for any reason can have adverse immediate, medium-, and long-term effects on those involved.

b. Bullying can occur in various forms:

- i. Direct physical bullying, such as hitting, kicking, tripping, pinching, and pushing, or damaging property *inter alia*.
- ii. Direct verbal bullying, such as name calling, insults, teasing, intimidation, homophobic or racist remarks, or verbal abuse *inter alia*.
- iii. Indirect bullying is an action designed to harm a person's social reputation and / or cause humiliation, and includes mimicking, lying, and spreading rumours, encouraging others to socially exclude someone, playing offensive jokes to embarrass and humiliate, and damaging someone's social reputation or social acceptance.
- iv. Cyberbullying is direct verbal or indirect bullying behaviours using digital technologies and includes:
 - a. Pranking, such as anonymous, mocking, or threatening phone calls or repeated hang-ups.
 - b. Image sharing, without permission, of unflattering or private images. These include images that may have been altered using AI.
 - c. The sharing of images of a sexual nature of a person under 18 by any person (child pornography) is a criminal offence that may result in prosecution. These include images that may have been altered using AI.
 - d. Using technology to send insulting or threatening messages.



- e. Publishing personal, private, or embarrassing information of another person online without permission, or spreading rumours online.
- f. Assuming someone's identity online and negatively representing them in a way that damages their reputation or relationships.
- g. Creating hate sites or implementing social exclusion campaigns on social networking sites.

UCT Online High School takes the following approaches to bullying:

- 1. We promote and support safe and respectful learning environments where bullying (amongst other forms of abuse) is not tolerated and is addressed with disciplinary actions against offending learners, parents / guardians, and team members.
- 2. We encourage learner engagement, and have processes and strategies in place to prevent and respond to incidents of bullying and other forms of unacceptable behaviour. This includes various learner support services and active monitoring of all online environments of UCT Online High School.
- 3. We work in partnership with learners, team members, and parents/guardians to reduce and manage bullying, and respond to all incidents of bullying.

7.4 Background checks

- a. As required by applicable laws, UCT Online High School has adopted recruitment procedures to help deter, reject, or identify people who might abuse children or are otherwise prohibited by law from working or interacting with children.



- b. We determine the suitability of prospective employees based on checks and evidence, including criminal background checks, references, and interview information, and do not employ persons or make use of contractors that interact with minor learners in contravention of applicable laws. As part of this, UCT Online High School requires employees that interact with learners to provide a valid Police Clearance Certificate, a clearance certificate from the National Sex Offenders Registry, and to be verified against the Child Protection Register.
- c. All subject specialists employed by the UCT Online High School are required to be registered with the applicable body or bodies for responsible educators (this includes registration with the South African Council for Educators (SACE)).

7.5 Team member conduct and interactions with learners

- a. While all UCT Online High School team members and contractors are responsible for their own actions and behaviour, subject to our codes of conduct, they are encouraged to avoid any conduct or situations that may lead any reasonable person to question their motivation and intentions.
- b. UCT Online High School conducts ongoing safeguarding training for relevant staff members and teams. This training includes, but is not necessarily limited to, mandatory virtual training on the provisions of this Policy, as well as training and professional development tools focused on the safeguarding of children, which have been developed with the assistance of resources provided by the International Centre for Missing and Exploited Children (ICMEC).
- c. UCT Online High School encourages team members to discuss any queries or concerns with the Wellbeing and Engagement team or with management.



d. All team members and contractors should:

1. Perform all interactions and work with learners in an open and transparent way, in full compliance with this Policy. Interactions with learners should be limited to the premises of UCT Online High School, UCT Online High School-approved centres, or the Online Campus, and where interactions occur elsewhere, parents / guardians and management should be informed beforehand.
2. Record incidents or decisions about any concerns in the performance of work, and discuss or seek advice from the Well-Being and Engagement team.
3. Apply the same professional standards to all work situations and learners regardless of gender, race, disability, sexuality, or any other characteristic.
4. Be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken.
5. Immediately report the circumstances of any situation that occurs with a learner, which may be subject to misinterpretation or may compromise professional ability, to the Well-Being and Engagement team.
6. Ensure any planned social contact with learners is approved by senior colleagues and advise senior management of any regular social contact that the team member has with a learner.
7. Avoid any unnecessary physical contact with learners, and be prepared to explain any contact with a learner, and not hit or otherwise physically assault anyone.
8. Refrain from using language that will mentally or emotionally abuse, or cause mental or emotional abuse.



9. Not act in any way that intends to embarrass, shame, humiliate, or degrade another person, UCT Online High School, or an awarding body.
10. Not develop a sexual relationship or engage in any sexual or personal conduct with a learner, or encourage an inappropriate attachment with a learner, including kissing, hugging, fondling, rubbing, touching, grooming, dressing, or exhibiting any form of sexualised behaviour in an inappropriate or culturally insensitive way, whether in person or online.
11. Not suggest, encourage, or allow inappropriate behaviour or relations of any kind, including allowing children to engage in sexually provocative games with each other, making sexual remarks, or discussing personal relationships with, or around, learners.
12. Not stand aside when they see or are aware of inappropriate or bullying actions being inflicted on others.

8. Team member reporting processes

The following processes should be followed in reporting any safeguarding issue:

8.1 Concern that a learner has been abused or harassed within their family, in their community, or in an online setting

- a. If a learner is in immediate danger, action appropriate to the circumstances must be taken, which could include contacting the Well-Being and Engagement team or an emergency line.
- b. Concerns about a learner suffering, or likely to suffer, abuse or harassment should be reported to the Well-Being and Engagement team.



- c. If, following a discussion with the Well-Being and Engagement team, there is still concern about the learner, the Well-Being and Engagement team must contact an appropriate safeguarding agency and / or the police to address the concern.
- d. The Well-Being and Engagement team should consider whether to inform the learner / parents / guardians about the concerns before contacting the police or a safeguarding agency, but parents / guardians of the learner must not be informed if informing them will put the learner at further risk of abuse.
- e. Any concerns, discussions, and decisions must be formally recorded in writing.
- f. The Well-Being and Engagement team should ensure that the safeguarding agency or police give you appropriate information about how they will proceed, and follow up on the report regularly.

8.2 Allegations of abuse concerning a team member or a contractor.

- a. You should report all allegations or safeguarding concerns about a team member immediately to HR, and formally record any concerns, discussions, and decisions.
- b. The HR should take action immediately to ensure that all learners are safe. Except in rare circumstances, this should not include the removal or denial of a service to any learner.
- c. Where appropriate or required in terms of applicable laws, a referral will be made to the police or a safeguarding agency.
- d. HR will consider whether a disciplinary investigation in respect of the team member is required.



- e. If the police or safeguarding agency do not proceed with the case, a decision will still need to be made as to whether any disciplinary actions against the team member, or actions to reduce risk to learners, are required.
- f. The relevant parents / guardians of any affected learners must be informed. National laws and principles of confidentiality and data protection must be complied with, however, all parents / guardians will need to know, at the appropriate time, that concerns have been raised about a team member and that appropriate action has been taken. The team member communicating with parents / guardians must request appropriate legal advice regarding any communications from legal representatives, and the police and relevant safeguarding agencies should be aware of any communications made about the concern.
- g. In the event that you feel your concerns are not being heard by HR, you can raise your concerns with the Chief Academic Officer.

8.3 Allegations of past abuse

When someone makes a disclosure to any team member, or they receive information that indicates that a learner suffered abuse as a child, you should:

- a. Immediately report the information to the Well-Being and Engagement team or HR where applicable, and make a clear record of your concerns and actions taken.
- b. Clarify whether there is any child or children who may currently be at risk from the alleged perpetrator.
- c. Ascertain whether the adult (who is alleging abuse) is aware of the alleged perpetrator's recent or current whereabouts, and any contact the alleged perpetrator may have with children and young people.



- d. The Well-Being and Engagement team or HR will advise whether the adult should make a formal complaint to the police, explaining that there is a significant likelihood that a person who has previously abused a child would have continued, and may still be doing so. Offer the adult support in making a formal complaint to the police and provide information about services that may be available to support them.
- e. If, following referral to a safeguarding agency or the police you remain concerned, the Well-Being and Engagement team or HR should consider and advise whether the matter should be escalating within UCT Online High School, or with the police or a safeguarding agency.
- f. Where it is believed that the alleged perpetrator has contact with a child, a referral should be made to the Well-Being and Engagement team or HR so that information about the situation can be gathered, and a decision can be made whether to apply child protection procedures in respect of the child or children with whom the alleged perpetrator has contact. Where an adult making a disclosure chooses not to make a formal complaint to the police, the adult should be advised of the possible risk to children, and that the information that has been shared by the reporting adult will be shared by HR or the Well-Being and Engagement team, and a referral made to a safeguarding agency or the police. If the adult wishes for his / her / their identity to remain anonymous, this must be respected, however, they should also be asked if they would be willing to talk with a representative of a safeguarding agency or the police to enable them to seek to safeguard any other child who may be at risk. Where information is received that an adult may have suffered abuse in a service not connected to UCT Online High School, the person making the allegation should be advised to contact the police or a safeguarding agency.

8.4 Concerns about sexually harmful behaviour to another learner



a. Harmful sexual behaviour includes:

- Using sexually explicit words and phrases.
- Eliciting and / or sharing explicit images. This includes those generated by AI.
- Inappropriate touching.
- Using sexual violence or threats.
- Full penetrative sex with a young person.

b. Sexual behaviour between young people is considered harmful if one child is older than the other, particularly if the age gap is more than two years, or one child is pre-pubescent, or where one child has power over another, even if they are the same age or younger.

c. If you have concerns about harmful sexual behaviours, you should:

- Report immediately to the Well-Being and Engagement team, and make a clear record of the concerns.
- Actions should be taken to ensure that all learners are safe, including the learner whose behaviour is of concern. This should not include the young person who is a victim of any alleged sexually harmful behaviour being moved from their class, residential unit, or having to unreasonably change their routine in any way.
- The Well-Being and Engagement team will refer the concern to a safeguarding agency and / or the police. Parents / guardians should be informed of the concerns and agreement should be made as to how the concerns will be addressed. This may include a referral to a counsellor or a health or non-government organisation resource.



- If following a referral to a safeguarding agency or the police you remain concerned, you should consider with the Well-Being and Engagement team, escalating any concerns either within UCT Online High School, or with the police or a safeguarding agency.

8.5 Reporting other safeguarding concerns

- a. If you are concerned about any harm that a learner may be experiencing, such as sexual exploitation, bullying, abuse by gang activities, and self-harm or suicide, you should speak to the Well-Being and Engagement team in order to consider whether to make a referral to a safeguarding agency or the police, about what actions should be taken to protect the learner, and when to inform the learner's parents / guardians. All concerns and actions taken should be clearly recorded.
- b. Where the young person is in immediate danger, you should call the police, a relevant safeguarding agency, or medical service., should the Well-Being and Engagement team be unavailable. Please refer to the emergency contact list on our website.
- c. Where there is a possibility of a criminal offence, the safeguarding coordinator must make a referral to the police.
- d. If following a referral to a safeguarding agency or the police you are still concerned, you should consider with the Well-Being and Engagement team, escalating your concerns either within UCT Online High School, or with the police or a safeguarding agency.

9. Important Disclaimers

a. Consent for Counselling (Learners 12+)



Learners aged 12 years and older may independently consent to receiving socio-emotional support (well-being check ins and support groups) without guardian consent. The school will nonetheless seek to involve guardians when external services or additional support structures are needed, provided this is in the best interest of the learner and does not place the learner at risk.

b. Missing Learners

Should a learner be reported missing, it is the *guardian's responsibility* to open a missing person's case at the South African Police Service (SAPS) and to provide an official poster containing all relevant identifying information. The school requires guardian consent before disseminating this poster to the parent/guardian community or any wider network.

c. Learners Over 18 (Adults Reporting Abuse)

When a learner over the age of 18 discloses abuse, they are legally considered an adult. As such, the school cannot report the matter to the Department of Social Development (DSD). The school will provide support, guidance, and encouragement for the learner to open a case with SAPS but cannot make the report on their behalf.

It is the guardian's responsibility to ensure that all learner contact information—including phone numbers and residential addresses—is kept accurate and up to date on the school portal. Failure to provide accurate information may prevent the school from: Contacting emergency services in urgent situations, and filing statutory abuse reports with the Department of Social Development.

In such cases, responsibility for the consequences of missing or incorrect information lies with the guardian.

d. Suicidal or Self-Harming Learners



If a learner is exhibiting suicidal ideation or engaging in self-harming behaviour, and the guardian refuses to obtain appropriate medical or psychological treatment for the learner, the school is obligated to file a **medical neglect** report with the Department of Social Development.

The school provides **short-term, needs-based counselling only**. We do not offer long-term counselling or therapeutic intervention. Where extended or specialised support is required, the school will recommend appropriate external services.

e. International Learners

As HPCSA-registered counsellors, we are legally and ethically restricted from providing counselling services to learners residing outside South Africa, as international jurisdictions operate under different regulatory bodies, legal requirements, and scopes of practice. For international learners, the school can provide: **Containment**, immediate emotional support, and risk assessment within our professional limits. **Referral assistance** to appropriate mental health professionals or services within the learner's country of residence.

10. Well-Being and Engagement team

The details of the UCT Online High School's safeguarding coordinator are:

- a. **Name:** Daniella Randall - daniella.randall@valentureinstitute.com

11. External resources

- a. ICMEC website: <https://www.icmec.org/>
- b. SACE website: <https://www.sace.org.za/>