



# INTERNATIONAL SCHOOL OF CAPE TOWN

## SAFEGUARDING & CHILD PROTECTION POLICY

### Maintenance

Policy owner	Safeguarding Team
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### Version Control

Version Number	Date
Version #2	October 2024 - SMT approved

Cross-references in the following sections:

[Code of Conduct](#) ; [Disciplinary Framework](#) ; [Transformation & Diversity Policy](#);  
[Bullying and Peer on Peer Abuse Policy](#)

All policies and procedures are version controlled and the most up to date versions are all available on the Shared Drive under ISCT Policies Folder. This policy will also be shared with the school community on the website. If you have any queries, please contact [k.reed@isct.co.za](mailto:k.reed@isct.co.za)



## 1. Introduction:

Safeguarding and promoting the welfare of children is a proactive approach and encompasses a range of measures ISCT has put in place to protect children from potential dangers and risks of exploitation, abuse, and neglect. The International School of Cape Town fully recognises its responsibilities for child protection as prescribed by the United Nations Convention on the Rights of the Child. (For particular reference, refer to Article 1: definition of the child, Article 3: best interests of the child, Article 4: the protection of rights, Article 12: respect for the views of the child and Article 18: parental responsibilities; state assistance. Learners should be made aware of their rights (Article 42). Section 28(2) of the *Constitution* emphasises the paramountcy of the best interests of the child. Similarly, *The Children's Act* built on this constitutional provision by expanding upon what the best interests of the child are and provides that in all matters pertaining to the care, protection and wellbeing of a child the best interest of the child will be of paramount importance.

The school recognises and accepts that the best interests of the child are of paramount importance as outlined in Section 28(2) of the Constitution and aims to work in partnership with children and families to maintain the overall welfare of the child. The International School of Cape Town is aware of UK safeguarding policies and adapts them to the local context in conjunction with implementing Western Cape Ed Dep's regulations and guidelines, and these form part of the school's ethos in that every child, regardless of their individual circumstances or background, should have plenty of access to support throughout their minority.

Child protection is defined as the activity that is undertaken to protect a specific child who is suffering, or is likely to suffer, significant harm caused by exploitation, abuse, or neglect.

Operational child protection procedures are child-centred and provide early help, which is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years and early adulthood.

ISCT follows the definition of safeguarding and promoting the welfare of children as set out in the UK statutory guidance document, *Working Together to Safeguard Children*, which defines it as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes



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## 2. Scope:

This policy applies to all staff, parents, learners and volunteers working in the school as well as everyone associated with ISCT. It encompasses the whole of the organisation and its programmes, and includes without limitation:

- students
- employees at all levels
- ISCT partners: these include volunteers, consultants and sub-contractors, and employees and/or representatives of partner organisations who have contact with our students, programme participants and the communities that we work in, and who may also be party to child and adult sensitive data while working for, or with us
- visitors: including family members, associates of ISCT employees, clients, journalists, researchers, media, and celebrities, who may come into contact with beneficiaries and the communities that we work in

## 3. Policy:

We recognise that because of the day to day contact with children, school staff are well placed to observe the outward signs of abuse. The school should, therefore:

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- Ensure children know that there are adults in the school whom they can approach if they are worried.
- Include opportunities in the Physical, Social and Health Education (PSHE) and Life Skills curriculum for children to develop the skills they need to recognise and stay safe from abuse.

There are four guiding principles to our policy that follow those outlined in [Education Development Trust's Global Safeguarding Policy](#):

- **Zero-tolerance** - ISCT follows a zero-tolerance approach against actual or attempted acts of all forms of exploitation, abuse, and harassment, including sexual exploitation, abuse and harassment (SEAH) perpetrated by employees or students towards members of the school community, whether physically or online.
- **Accountability** - Safeguarding legal accountability rests with the school leadership and Board of Directors with clear lines of incident reporting and compliance monitoring procedures via EDT's Corporate Safeguarding Committee (CSC). ISCT takes a risk management approach to safeguarding throughout its operations, ensuring, as far as possible, effective mitigation of inherent and known risks, and responding to incidents and emerging risks.
- **Responsibility** - Our key priority as a school is to establish a safe environment in which children can learn and develop. In light of this, all employees and members of



the school community act with integrity, acknowledging that safeguarding is everyone's responsibility and we each have a role to play in ensuring a vigilant and safe culture by participating in the following procedures:

- o **Employment cycle:** including safe recruitment procedures in checking the suitability of staff and volunteers to work with children, performance management, and exit arrangements including referencing
- o **Mandatory Safeguarding training:** This should take place at least every 18 months and should include:
  - Raising awareness of child protection issues and equipping children with the skills needed to keep them safe
  - Providing procedures for identifying and reporting cases, or suspected cases, of abuse
  - Supporting learners who have been abused (and/ or allegedly abused) in accordance with a child protection plan that is done in consultation with the child concerned and their parent(s)/ guardian(s)
  - Safer recruitment training for all relevant staff (every 2 years)
  - Ongoing awareness raising activities/ training and resources
- o **Serious incident/concern reporting**
- o **Risk management:** This is a mandatory process for all trips, visits and events.
- o **Abiding by the Code of Conduct and the safeguarding requirements:** Specifically in the areas of direct and indirect contact with students, programme participants and community members.
- **Transparency** - All employees commit to promptly reporting safeguarding incidents or concerns to their designated safeguarding lead/s (DSLs) so that immediate action can be taken to:
  - o eliminate further harm to the individual/s
  - o refer to statutory child/adult protection agencies, including the police when a potential crime has occurred
  - o report to regulatory authorities and donors/clients
  - o instigate the case management procedure

ISCT will provide prompt reports to EDT, statutory agencies and regulators, sharing information in an honest and transparent manner.

## A. Roles and Responsibilities

**School Principal** is responsible for reporting to the Corporate Safeguarding Officer and the Board of Directors any issues in relation to safeguarding and child protection. This will include monthly online meetings as well as quarterly Corporate Safeguarding Committee (CSC) meetings with EDT. The School Principal should attend at least one training course every two years focused on child protection and safeguarding within a school context.

**Safeguarding Trustee** is part of the Leadership Team and is responsible for leading the Safeguarding Team.



**Safeguarding Team** is a committee comprising all Designated Safeguarding Officers (DSOs) as well as the Designated Safeguarding Leads (DSLs). It is chaired by the Safeguarding Trustee, who reports directly to the Principal on the strategic and operational work of the committee. The Safeguarding Team is responsible for implementing the action plan and conducting the annual evaluation.

**Corporate Safeguarding Officer (CSO)** Under the leadership of EDT's Head of Corporate Safeguarding, the CSO is also responsible for responding to child/adult protection concerns and coordinating the annual evaluation cycle.

**Designated Safeguarding Leads (DSLs)** are responsible for implementing local, operational child/adult protection procedures and complying with internal reporting procedures and external referral mechanisms. They are also responsible for coordinating incident/ allegation management relating to staff and beneficiaries in collaboration with the Principal.

**Designated Safeguarding Officers (DSOs)** are responsible for implementing proactive measures as decided by the Safeguarding Team.

**All employees** are responsible for recognising potential signs and indicators of exploitation, abuse, and harassment, and promptly reporting incidents/concerns to their DSL in their respective school section.

## **B. Management:**

Safeguarding is embedded throughout the school's governance structure and safeguarding management procedures, which include the following:

- Corporate Safeguarding Committee (CSC) meetings with EDT
- Monthly meetings between the DSLs, Principal and EDT Safeguarding Officer to discuss cases, update information on MyConcern and assess the action plan implementation
- Quarterly meetings for the Safeguarding Team to assess achievement of action plan items
- Weekly meetings between the Principal and DSLs
- Internal annual evaluation and report to EDT
- Safeguarding action plans governed by the principle of continuous improvement in both compliance and best practice
- Partner/ sub-contractor due diligence
- Risk management including risk assessments
- Safe recruitment procedures, including criminal record checks and references
- Induction and continuous/every 18 months mandatory safeguarding training provision. Training will cover prohibited behaviours, reporting obligations, and how to maintain appropriate boundaries with beneficiaries
- Serious incident reporting to statutory and regulatory agencies
- MyConcern online reporting and case management system and central log
- Incident/case management and review
- Safeguarding whistleblowing policy and procedure

The school endeavours to follow the procedures set out by the Western Cape Education Department (WCED) "**Abuse No More**" (WCED Policy) and take account of guidance issued to:



- Ensure we have a designated senior person(s) (Designated Safeguarding Officer and Designated Safeguarding Lead) for child protection who has received appropriate training and support for this role. At ISCT this role is held by the school counsellors and details surrounding responsibilities are included in their job description.
  - The Designated Safeguarding Lead (DSL) shall be required to either be registered as a healthcare professional with the Health Professions Council of South Africa (HPCSA) or a social worker with the South African Council for Social Service Professions (SACSSP). The DSL shall ensure that they are up-to-date with their Continuous Professional Development requirements and ethical training and attend at least one training course per year focused on child protection and safeguarding within a school context.
  - The Designated Safeguarding Officer (DSO) - the DSOs should attend at least one training course every two years focused on child protection and safeguarding within a school context.
  - Key Stage Heads act as Deputy Safeguarding Leads and will be involved in discussions and implementation of support where appropriate.
- Ensure every member of staff (including temporary and support staff and volunteers) and the governing body knows the name of the designated senior person(s) responsible for child protection and their role. This is achieved through the staff handbook, staff training and posters throughout the school grounds.
- Ensure all staff and adults working with children on the school premises understand their responsibilities in being alert to the signs of abuse and neglect and how to refer any concerns to the Designated Safeguarding Lead responsible for child protection. ISCT expects all teaching staff to complete safeguarding training courses every two years and attend yearly refresher sessions led by the DSO and DSLs.
- Ensure that students are aware of who the DSLs are and how to contact them if they have any concerns. This is done through the student handbook, assemblies, PSHE lessons and information posters placed in all bathrooms and around the school.
- Ensure that parents have an understanding of the responsibility placed on the school and staff for child protection by sharing this policy on the school website. Additionally, the DSO and DSLs will be introduced in the school newsletter in the first term of each new school year.
- As per Government regulations, the DSL should notify the Department of Child Development if there is an unexplained absence of more than two days of a learner who is on the child protection register.
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences and supervision.
- The DSL will keep written records of concerns about children, even where there is no need to refer the matter immediately.
- Ensure all records are kept securely; separate from the main learner file, and in locked locations and secure online files. These files are kept locked in the DSL's



office in a separate filing cabinet. Keys for this cabinet are kept by the DSL, DSO and Principal.

- Follow Education Development Trust's procedures for managing safeguarding allegations made against school staff in accordance with the Global Safeguarding Policy and procedures.
- Ensure safe recruitment practices are always followed which includes background checks, police clearance certificates issued no older than 6-months prior to the date of the interview, following up with references and investigating any gaps in a person's CV.

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

- The content of the curriculum in PSHE lessons and assemblies.
- The school ethos promotes a positive, supportive and secure environment and gives learners a sense of being valued.
- The school code of conduct, bullying policy and disciplinary framework are aimed at supporting vulnerable learners in the school. The school will ensure that vulnerable learners understand what behaviours are unacceptable but they are valued and not to be blamed for any abuse which has occurred.
- Liaise with external therapists assisting the child and with other agencies that support the learner such as Child Welfare Services and the Family Violence, Child Protection and Sexual Offences (FCS) unit of the South African Police Service (SAPS).
- When a learner on the child protection register, with an active investigation, leaves the school, their information shall be transferred to the new school timeously and that the new school counsellor/ DSL is informed. If there is not an active case open, information can only be shared with new parties with the express consent of the child and their parent(s)/ guardian(s).

### **C. Communication with Parents**

The primary responsibility for safeguarding and the protection of children rests with parents/carers who should feel confident about raising any concerns they have in relation to their child. As part of the ongoing work to foster good relationships with parents, the school aims to help parents understand the school's responsibility for the welfare of all the children and young people in its charge.

In cases involving individual minors, parents will be notified of the school's concerns at the earliest appropriate opportunity. The school will always protect the best interests of the child, and in cases of suspected abuse, may refer cases directly to investigative agencies.

Where a group of students is involved, the parents of all relevant parties will be notified so that information is shared appropriately whilst maintaining confidentiality, and a response agreed that safeguards and protects each child involved.



#### D. Professional Confidentiality

Confidentiality is an issue that needs to be discussed and fully understood by all those working with children, particularly in the context of child protection. In child protection situations the school is **mandated by law** to share information with agencies to ensure that individuals receive the right support and advice. The only purpose of confidentiality in this respect is to benefit the child.

A member of staff should never guarantee confidentiality to a learner nor should they agree with a learner to keep a secret. Where there is a safeguarding concern, this should be reported as soon as possible as it may require further investigation by appropriate authorities. Staff will be informed of relevant information in respect of individual cases regarding child protection on a “need to know basis” only. Information that forms part of any therapeutic intervention which a child accesses within the school and/or externally shall only be shared when deemed necessary and in the best interest of the child. All information shared with a member of staff in this manner must be kept confidential.

#### E. Definitions of Abuse

The United Nations defines violence against children as, ‘all forms of physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse’. The following is a summary of the main types and typical symptoms of child abuse. The symptoms are covered in more detail in the WCED “**Abuse No More**” protocol. Symptoms must **not** be viewed in isolation. If there are any doubts about these symptoms, these should be discussed with the school counsellor (DSL), DSO, or Key Stage Heads. The following procedure should be applied if there is any suspicion of some form of child abuse:

- **Physical abuse:** Deliberately physically hurting a child. It might take a variety of different forms including hitting, biting, pinching, shaking, throwing, poisoning, burning, scalding, drowning or suffocating a child. New legislation within South Africa ruled that the common-law defence of “reasonable chastisement” is no longer in line with the Constitution and the use of physical discipline is illegal.
- **Neglect:** Neglect is often the most difficult form of abuse to accurately evidence due to aspects relating to ‘hidden harm’. Neglect is ultimately the failure to provide for a child’s basic care needs, whether it be adequate food, clothing, hygiene, supervision or shelter that is likely to result in the serious impairment of a child’s health or development. Children who are neglected often also suffer from other types of abuse. e.g. the child does not grow and/or loses weight, is pale and emaciated, withdrawn and/or does not reach developmental milestones within the normal age-range.
- **Sexual Abuse:** Occurs when others use or exploit children sexually for their own gratification, gain or gratification of others. Sexual abuse may involve physical contact, including assault by penetration or non-penetrative acts. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities or encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including e-technology, social media,





etc.). Sexual abuse is not only perpetrated by adult males. Women can commit acts of sexual abuse, as can other children. Disclosures relating to sexual abuse are reported directly to investigative authorities.

- **Emotional abuse:** The persistent emotional maltreatment of a child. It is also sometimes called psychological abuse and it can have severe and persistent adverse effects on a child's emotional development. Emotional abuse may also involve bullying - including online bullying through social networks, online games or mobile phones, by a child's peers. Symptoms of emotional abuse may include bedwetting, soiling and continual complaints of headaches, nausea, and/or stomach pain for which there is no physical cause. Emotional abuse is also inherent in all other forms of abuse and maltreatment.

**Domestic Violence:** It is important to recognise that many children will be living or have lived in home environments where domestic violence is a factor, and these environments have a profoundly negative effect on a child's emotional well-being as well as putting them at risk of significant harm.

**Gender-based Violence (GBV - [link](#)):** The United Nations (UN) Declaration on the Elimination of Violence against Women describes GBV as follows: Any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivations of liberty, whether occurring in public or private life. Violence against women shall be understood to encompass, but not be limited to, the following: physical, sexual and psychological violence occurring in the family [and in the community], including battery, sexual abuse of female children, dowry-related violence, marital rape, female genital mutilation and other traditional practices harmful to women, non-spousal violence and violence related to exploitation, sexual harassment and intimidation at work, in educational institutions and elsewhere, trafficking in women and forced prostitution and violence perpetrated or condoned by the State.

**Peer-on-Peer Abuse (POPA - [link](#)):** Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control exercised between children, and within children's relationships (both intimate and non-intimate), friendships, and wider peer associations. Peer-on-peer abuse can take various forms, including (but not limited to): serious bullying (including cyber-bullying), relationship abuse, domestic violence and abuse, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour and/or prejudice-based violence including, but not limited to, gender-based violence. Online peer-on-peer abuse is any form of peer-on-peer abuse with a digital element, for example, sexting, online abuse, coercion and exploitation, peer-on-peer grooming, threatening language delivered via online means, the distribution of sexualised content, and harassment.

Please refer to ISCT's [Bullying and Peer-on-Peer Abuse Policy](#).

**Child Sexual Exploitation (CSE)** involves exploitative contexts or situations where young people receive something (e.g food, mobile phone credit, accommodation, gifts, drugs, money, or in some cases simply affection) as a result of engaging in sexual activities. CSE can take many forms, ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs or groups. What



marks exploitation, is an imbalance of power in a relationship. For example, the perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. It is important to note that some young people who are being exploited do not display outward signs of abuse.

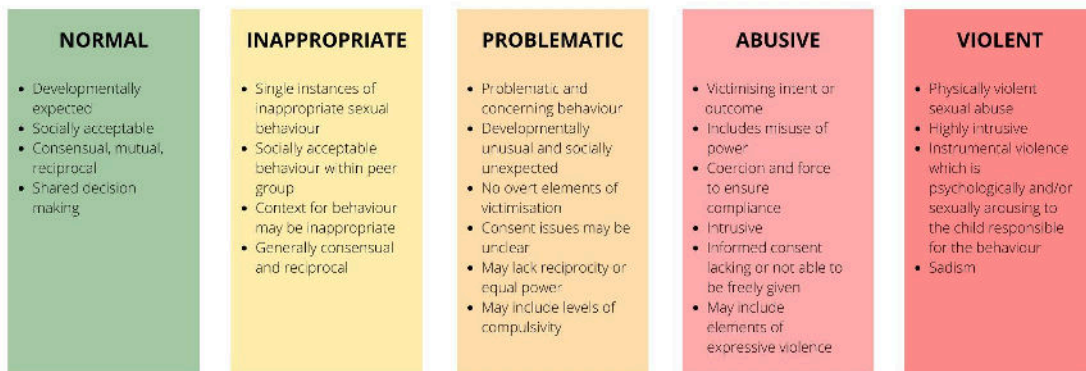
**Female Genital Mutilation (FGM):** There is currently no acknowledgement by the government that FGM exists in South Africa. Within the South African legal context, The Promotion of Equality and Prevention of Unfair Discrimination (Equality Act) outlaws discrimination of any person on grounds of gender and culture, including FGM. Under Section 12(2), the Children’s Act explicitly prohibits genital mutilation or circumcision of female children.

**Sexual Behaviours Continuum Model:** Page 12 & 13, [Farrer Peer-on-Peer Abuse](#)



**SEXUAL BEHAVIOURS CONTIUUM MODEL**

A guide for reporting purposes



Hollist's Continuum of Sexual Behaviours in Children (Farrer, 2015)

**Statement on Preventing Radicalisation:** The school works within the curriculum to promote tolerance and respect for diverse views while challenging prejudice of any kind. We are an inclusive school that values fostering a sense of belonging for our children. Whilst we accept that “extremism” is a global threat, South Africa has not been identified as having an active radical group operating in its territory. Given that the school is governed by South African laws and regulations, there is currently no legal duty to implement prevention strategies in this regard. Should the need arise to address radicalisation, the school should adhere to local policies and guidance, in addition to working collaboratively with members of the school community.

**F. Preventative Measures**

**This refers to all processes undertaken to safeguard the whole school community and student body.**



**All visitors will be required to wear a lanyard or other form of identification which clearly identifies them apart from the school community.**

Visitors must be easily identifiable and comply with the safeguarding rules and regulations stipulated on the back of the lanyard. In the case of school events, access will be controlled through measures such as stickers with the school logo will be supplied to families who are required to wear them to gain access to the school event on the day.

**All visiting vehicles will be scanned in at both campuses** (Struben House and Woodland Heights).

**Dedicated Email address for all safeguarding-related concerns:**  
[safeguarding@isct.co.za](mailto:safeguarding@isct.co.za)

This email address' purpose is for any concerns to be brought to the attention of the safeguarding team.

### **KS2 Gate Access Control**

The KS2 gate leading to the KS2 playground should remain closed at all times to stop children moving through the staff parking area.

### **The Rule of Two**

This rule mandates that an adult is never alone with a child, whether in-person or online.

### **Bathroom Venue Separation - Refer to Appendix B**

At no time is an adult to share bathroom facilities with a child. Provision must be made for allocation of child and adult specific bathrooms, with clearly marked signage.

### **Monitoring Absenteeism of Students**

If a student is absent from school for more than two consecutive days, a reasonable notification from parent/s, doctor's note or medical report will be necessary to support their non-attendance. Likewise, absenteeism during the school day during lessons, will be closely monitored on our EdAdmin attendance register together with class teachers, class tutors and the school receptionist.

### **Use of School Phones**

The School should always have smart phones available for staff should they need to communicate with parents or students on trips or while chaperoning sports teams. These school phones should be the only devices used for communication between the organising staff members and parents or students. This should be done through Whatsapp groups set up on these school devices and should always include at least two members of staff. This ensures that neither parents nor students have direct access to staff members' personal contact details. In exceptional cases where students and parents, guardians, and / or carers may need to contact the organising teacher and a phone is unavailable, appropriate plans must be made in collaboration with the School Principal to support this communication and mitigate all risks involved.

### **Appropriate Approach and Response**



Schools should adopt a zero-tolerance policy towards all forms of peer-on-peer abuse, and ensure that no form of any such abuse (no matter how 'low level' it may appear) is ever dismissed as a joke or banter. Schools should identify and handle cases sensitively, appropriately, and promptly. They should ensure that they have effective policies, procedures and practices in place to prevent, identify, and appropriately respond to cases of peer-on-peer abuse.

Robust safeguarding policies and procedures which are effectively implemented, training for staff on identifying and managing cases (see further below), and providing resources to staff to assist in the consistent identification and recognition of abuse, are key. In order to provide an appropriate response to peer-on-peer abuse, schools:

(i) should pose themselves a number of questions on gender and other equality issues that can help to inform the nature of the phenomena; and

(ii) may need to consider gender issues including, for example, the extent to which girls access STEAM subjects (if the school is a mixed provision), or the extent to which aggressive behaviours are displayed by boys, and how boys are responded to differently.

## **G. Procedure and Dealing with a Disclosure**

ISCT follows the same principles and procedures for safeguarding of all concerns - both physically and online. If you have a safeguarding concern of any nature, you must promptly report it.

### **Dealing with disclosure and reporting the incident**

Disclosure of abuse can be a very traumatic experience for both the complainant and the school counsellor or teacher assisting the child and must be handled as sensitively as possible. It is the responsibility of all members of the school community to report any safeguarding concerns or disclosures. In cases involving sexual abuse, Section 54 of the Criminal Law (Sexual Offences and Related Matters) Amendment Act, 2007, (Act 32 of 2007) (i) - (vii) mandates that knowledge, reasonable belief or suspicion of a sexual offence against a child is required to be reported immediately to the School Counsellor /Designated Safeguarding Lead, who in turn notifies the relevant authorities, DSO and Deputy Safeguarding Leads.

Section 3 of the WCED policy document (pp 4-20) provides guidance on how to handle disclosure.

**At the point of disclosure, it is preferable to minimise the role of the teacher and to hand it over to the Designated Safeguarding Lead.**

The DSL is to document all information gathered from the learner and to use guidelines in the policy document to ensure there is sufficient information to warrant disclosure. This will also help should the South African Police Services (SAPS) require a sworn statement in a criminal case.



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**Staff are to refer to the ISCT flow Chart of referral in abuse or neglect cases on display in both Staff rooms and outlined in this policy.**

**Procedures and principles that must be applied by teachers/staff members/volunteers during or after disclosure.**

- Speak to the child. Sensitively gather information without implicating any person and in a non-intrusive manner i.e. don't come right out and ask but try to glean information in a way that makes the child feel at ease to talk without feeling they are betraying a trust.
- Any member of staff receiving a disclosure of abuse or noticing signs or indicators of abuse, must make an accurate record as soon as possible noting what was said or seen, putting the event in context, and giving the date, time and location. All records must be dated and signed and will include the action taken. Refer to Addendum A: "Record of Concern". *Please refer to Addendum B.*
- If a child discloses that they have been physically assaulted and states that there is a marking on their body (e.g. bruise, pinch or hand mark), avoid asking the child to display this to you openly, especially if you are the only adult with the child at the time of disclosure. A child may show you a marking from an assault without prompting and as with any disclosure, ensure that information is gathered sensitively, recorded and safeguarding concerns are reported to the Designated Safeguarding Lead.
- The DSL will document the information in a file (e.g. information from the learner, information from other learners and/or parents, and reports from parents and teachers).
- Treat this information as highly confidential (all information gathered must be placed on a separate file and stored in a strong room or safe). This information must not be discussed with other teachers, staff, learners, or parents.
- Report suspicions to the DSL, school counsellor/ social worker or to the principal, who will then follow the procedures outlined in the WCED policy document.
- If a child is being groomed or sexually exploited online, a referral/ report to relevant statutory authorities will be made.

**Please do not use the guidelines as a checklist during a discussion with the child concerned. The complainant must be given the opportunity to speak spontaneously.**

**Procedures and principles that must be applied by the Designated Safeguarding Lead/ School Counsellor/ School Social Worker during or after disclosure:**

*Each child protection case will be monitored and reviewed by the Corporate Safeguarding team at EDT to ensure that timely and effective action has been taken by the DSL and local staff.*

**Step 1:** Ensure the safety of the learner (in collaboration with the SAPS, especially in cases of sexual abuse, and the school counsellor who shall ensure that the learner will not have direct contact with the alleged offender).

**Step 2:** Explain to the learner that all the information will be treated in confidence, but there is an obligation to report the case (when it is assessed and deemed to be either abusive or violent [refer to Hackett's continuum]) to other role-players such as the Department of Social



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Development, Child Welfare and/or the SAPS. The roles that the various parties will play as well as the procedures that will be followed are laid out in steps 3 – 9.

**Step 3:** The school principal should be informed (unless he or she is implicated). No detailed information about the alleged abuse needs to be disclosed at this stage.

**Step 4:** The relevant role-players provided in the list below should be contacted within three days after the incident in order to decide on the process of intervention. If there is any uncertainty about who to contact, contact the school social worker or the **WCED Safe Schools Call Centre at 0800-45-46-47**. Other contact numbers are provided on [page 33 of WCED policy document](#).

- The local welfare organisation;
- The school psychologist;
- The Child Protection Unit;
- The SAPS in the residential area of the complainant;
- Labour Relations, when employees are the alleged offenders;
- The complainant's parent(s) (with the consent of the complainant, if she or he is over 14), provided that they are not the alleged offenders;
- The Child Protection Centre;
- The Department of Health and the Department of Social Services;
- The school nurse (if available)

**Step 5:** A confidential report and Form 22 should be compiled by the Designated Safeguarding Lead/School Counsellor with the assistance of the teacher and/or school principal for the social worker and the SAPS. Confidentiality should be maintained by following the procedures provided on page 27 of the WCED policy document.

**Step 6:** A meeting with the relevant role-players mentioned in Step 4 should be convened in order to draw up a plan of action to indicate the responsibilities of each participant in the interview process. The school principal must then report the case or incident to the Head: Specialised Support Services at the relevant Education Management and Development Centre (EMDC). The DSL will assess the report and liaise with the Corporate Safeguarding team on the most appropriate course of action, including external reporting and referral to statutory authorities

**Step 7:** The Designated Safeguarding Lead/School Counsellor or Designated Safeguarding Officer/ School Principal will follow up with all the role-players, document the process and inform them of the progress. He or she will also pass the information onto the Head: Specialised Support Services at the relevant EMDC. The DSL will retain a chronology of the matter on MyConcern until a satisfactory conclusion resulting in the safety of the child is implemented.

**Step 8:** At all times, the learner and her/his parent(s) should be kept informed of the steps taken by the role-players and the outcome of the investigation.

**Step 9:** The learner's emotional, mental and physical health should be regularly monitored by the School Counsellor or school principal and discussed with his or her parents. If necessary the learner should be referred for further professional help.

**Step 10:** DSL records incidents on My Concern along with actions taken, lessons learned and when the case is closed, the date of closure.



### **Dealing with alleged offenders**

The following guidelines refer to situations where the alleged offender is another learner, a teacher or school employee, or a school principal.

### **What to do when a learner is the alleged offender:**

Follow steps 1 – 9 above to assist the alleged learner offender. This should be seen as an attempt to prevent the alleged offender from committing further abuse. Steps on page 7 of the WCED Abuse No More Protocol shall implement the following additional procedures if necessary:

- Contact the alleged offender's parents, inform them of the incidents and discuss a plan of action for support and intervention.
- Refer the alleged offender for emotional support and therapy if necessary.
- The alleged offender should be dealt with through the school's disciplinary procedure and Code of Conduct policy (If the offence falls within Level 3 of the Bullying Policy or Disciplinary Framework, the school principal will refer the matter to the governing body of the school).

### **Guidelines from Abuse No More Protocol and [Peer-on-Peer Abuse Toolkit pg 19-21 \(Farrer & Co.\)](#) regarding the management of disciplinary measures against a learner being the alleged perpetrator**

(a) School policies must make provision for the transgression(s).

(b) The disciplinary process, aligned with the [Regulations Relating to Disciplining, Suspension and Expulsion of Learners at Public Schools in the Western Cape](#) (Provincial Gazette 6939, dated 11 December 2011, can only take place if there has been a transgression of the school's Learner Code of Conduct or other legislation.

(c) In a situation where the learner victim and the alleged learner offender are at the same school, the alleged perpetrator is placed on precautionary suspension for 7 days, awaiting a disciplinary hearing. (d) The disciplinary hearing should take place according to a prescribed procedure, in the Regulations as referred to in subparagraph 3.4(b). *The alleged learner victim, with parental consent, is encouraged to take a leave of absence until investigations have started and the level of risk is determined. The alleged perpetrator and victim's learning will both be supported during their physical absence from school.*

(e) The individual's right to a fair and reasonable hearing should be honoured.

(f) These principles should also apply to the way in which arguments are presented.

(g) In deciding the most appropriate sanction, take into consideration: (i) The age and developmental phase of the learner; (ii) Learner's disciplinary record and willingness to change; (iii) Learner's regret and willingness to put the offence right; and (iv) Recommendations from professional service providers supporting the alleged learner offender. 8 Abuse No More Protocol of the Western Cape Education Department

(h) Both the learner victim and the alleged learner offender have the right to legal representation should they choose to have such representation.

(i) Always remember to act in the best interest of the child.

(j) A safety plan and risk assessment will be put in place before students return to school. [\(Template can be found here\)](#)

(k) Consideration will be given to support any students (and, where appropriate, staff and parents) who know about and/or may be affected by the alleged behaviour and refer to external agencies/ professionals where appropriate.

### **What to do when a teacher or school employee is the alleged offender:**



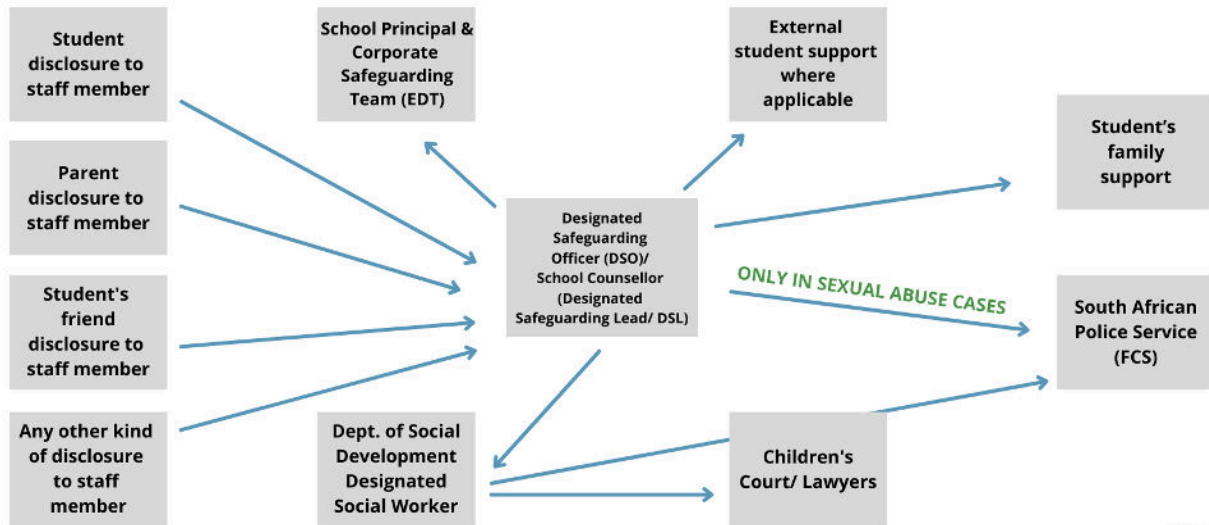
The parent, teacher or employee to whom the disclosure was made should inform the DSL and/or the DSO. The DSL or Principal will inform the chief executive (CE) of Education Development Trust and the Corporate Safeguarding Team in line with the Global Safeguarding Policy. Thereafter, the chair of the Board of Directors will be consulted with.

**What to do when the school principal is the alleged offender:**

The employee to whom the disclosure was made should refer to the Whistleblowing Policy as instances of abuse are deemed a 'qualifying disclosure', or the employee themselves can report it according to the process outlined herein. A disclosure can also be submitted to the Trust's whistleblowing email box at: [confidentialconcerns@educationdevelopmenttrust.com](mailto:confidentialconcerns@educationdevelopmenttrust.com) Please refer to [ISCT's Whistlingblowing Policy here](#)



**FLOWCHART OF REFERRAL IN CHILD ABUSE OR NEGLECT CASES**



UPADTED JULY 2024

**Breach of policy**

Breach of this policy including violations related to the use of AI technologies may result in disciplinary action up to and including dismissal. Any employee suspected of committing a breach will be required to co-operate with a full investigation. EDT reserves the right to monitor all EDT owned computers and internet access including online mentions and discussions.





#### 4. Associated Policies and Documents

Safeguarding is a cross-cutting issue, intersecting with many aspects of ISCT's operational management policies and procedures demonstrated by its links to, and specific provisions in, the following documents:

- Student Code of Conduct
- Staff Code of Conduct
- Whistleblowing Policy
- Education Development Trust's Global Safeguarding Policy
- EDT Digital Safeguarding Policy
- High School Disciplinary Framework
- Primary School Behaviour and Discipline Policy
- Disciplinary Procedure for Students
- Transformation & Diversity Policy
- Bullying and Peer on Peer Abuse Policy
- Disciplinary Policy and Procedure (staff)
- Recruitment Policy
- Risk Assessment
- Internet policy
- ISCT Counselling Policy
- Parent Code of Conduct
- Trips overview, event planning procedures and risk assessments

#### 5. Implementation and Monitoring

The monitoring and adherence of this policy is the responsibility of the Safeguarding Team. The Safeguarding Team must report all serious incidents or breaches to this policy to the Principal who will report it to EDT's Corporate Safeguarding Officer.

The regular review of this policy is the responsibility of ISCT's Safeguarding Team. All safeguarding documents, procedures and associated policies should be aligned with this policy after each review cycle. The policy will be presented to EDT's Corporate Safeguarding team for approval. ISCT's Safeguarding Team retains accountability for the safeguarding and child/adult protection procedures/ processes of the School and will review this policy every two years. This policy will be posted on the school's website and made readily available to all employees and members of the school community.

#### 6. Resources and Links for further information:

The United Nations Convention on the Rights of the Child:

<https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>



Abuse No More Protocol of the Western Cape Education Department:

<https://www.westerncape.gov.za/text/2014/October/amended-abuse-no-more-protocol.pdf>

Childline South Africa:

<http://www.childlinesa.org.za/>

Child Care and Protection Services of the Western Cape Government:

<https://www.westerncape.gov.za/service/child-care-and-protection-services>

Cape Town Child Welfare:

<http://www.helpkids.org.za/>

National Society for the Prevention of Cruelty to Children (NSPCC):

<https://www.nspcc.org.uk/>

Peer-on Peer Abuse Toolkit (Farrer 2019):

<https://drive.google.com/file/d/1LrfMqdbdN9q2PXxcAtiLg1KXcMvIC2HJ/view>

## 7. Appendices

Appendix A: Digital Safeguarding

Appendix B: Personal Care and Toileting

Appendix C: Parent Consent Form for Personal Care

Appendix D: Record of Concern Template

Appendix E: Template declaration

Last revised: 16/10/2024

Trust review by CSA



## APPENDIX A

### Digital Safeguarding

Digital safeguarding refers to the safeguarding policies, procedures and practices relating to online spaces. The same safeguarding principles apply to ISCT's programmes, schools and activities, both online and offline.

Digital technology has brought about new risks and there are specific considerations to be observed with online activities and initiatives in the context of safeguarding at ISCT. ISCT acknowledges the diverse range of digital safeguarding risks, including content, contact, conduct, commerce related risks, and technology-based gender violence.

### Digital Safeguarding Risks

Knowing about risk and behaviour are the two fundamental principles of online safety.

In online/digital safeguarding the following risks must be considered:

- **Content risks:** risks that are produced as a result of the material that people can access online and may be exposed to this content actively or passively, and which may produce a harmful effect. Content may be illegal to possess or share according to national laws, e.g., sexually exploitative images of children, radicalising videos, and websites advocating unhealthy or dangerous behaviours, such as self-harm or suicide.
- **Contact risks:** risks that are produced as a result of others' online behaviour. Individuals may have information about them shared or may be engaged in ways which lead to harmful consequences. The types of behaviour which people may experience include online bullying or through mobile 'phones, harassment and stalking, and non-contact sexual abuse and exploitation, including grooming.
- **Conduct risks:** risks that are produced as a result of people's own online behaviour, which may put themselves or others at risk, e.g., an individual may download something illegally, unintentionally reveal their location, bully, harass or exploit others.
- **Commerce:** risks that are produced as a result of an individual's online activities that could lead to harm or exploitation with financial consequences. E.g online scams, phishing attacks, identity theft and unauthorised access to personal details and information.

**Technology-based gender-based violence:** ISCT recognises that online abuse can affect anyone, but is most likely to affect women, girls and LGBTQI+ individuals. These groups face an increased risk of online violence including, online harassment, bullying and sexual exploitation. Digital safeguarding concerns or allegations can come about in various ways such as:



- **Cyberstalking** – Harassing or frightening someone by using digital communication platforms to contact them.
- **Disinformation** – Intentional and deliberate efforts to spread the wrong information online.
- **Misinformation** – Sharing information which you think is correct but is not.
- **Hacking** – Accessing or using computer systems or networks without the correct authorisation and with the intent to exploit the information.
- **Impersonation** – Pretending to take on an identity that is not your own online. This can also be known as “catfishing”.
- **Online bullying** – Using a digital platform to harass, intimidate or bring harm to others through messages, posts or other online actions.
- **Harmful content sharing** – Sharing or posting content that encourages harmful behaviours online such as self harm, suicide and eating disorders.
- **Radicalisation** – Using digital platforms to share extreme beliefs or ideologies often leading to radical behaviours of actions such as acts of terror, violence and extremism.
- **Sexual exploitation** – Developing a relationship with a child with the intention to coerce or manipulate them into sexual activities through the abuse of power.
- **Sharing illegal images** – Posting or sharing images online that incite violence, hate or terrorism. This also includes inappropriate imagery of children linked to child sexual abuse.

The above list outlines key digital safeguarding risks but this list is not exhaustive.

Digital threats are constantly evolving and new risks may emerge over time so there is a need to remain vigilant and proactive in identifying and reporting risk to your DSL's and the corporate safeguarding team.

### **Safe Programming and Online/Digital Risk Management**

Effective analysis is essential to identify potential risks for all in scope of this policy when working and operating online. Assessed risks, potential consequences and mitigation strategies must be included in the wider safeguarding risk assessment process prior to any programmes, activities or initiatives which have a digital element, begin.

The following elements should be considered as part of effective digital risk management:

- the social, cultural, and political context which may increase online/digital risk
- the individual situation of those involved in ISCT including intersectional factors relating to race, ethnicity, religion, age, sex and gender identity/expression, sexual orientation, disability, neurodiversity, political affiliation, and any other status that might put an individual at risk online.
- Unique challenges that may be posed by AI integration and implementation within the School.

### **Online Risk Mitigation**

The extent of online/digital safeguarding risks identified will determine ISCT's mitigating actions, which may include advice to reduce online activity.

Where ISCT cannot mitigate risk, this may result in avoiding online activity if there is a risk of identification through online activities that may put an individual at risk of gender-based violence, political violence, exploitation, abuse, harassment, targeting and bullying.



ISCT recognises that children and young people use the internet and technology intuitively. Children and young people don't tend to differentiate between online and offline, and engage online for many positive reasons, such as making friends and giving and receiving support.

Due to lack of life experience and emotional resilience, children and young people can be unaware of online/digital risks, such as oversharing information. Whilst the internet has entertaining, engaging and educational content, it also has illegal and inappropriate content viewed by children, which has safeguarding implications and can have a negative impact on a child's or young person's mental health and emotional wellbeing, and physical safety.

ISCT staff must discuss with students during lessons the internet in an open manner, highlighting the positives and being proactive in ensuring that children and young people are supported to:

- understand motives behind why different people contact them online and know how to report any concerns
- use critical thinking skills and seek help if they are unsure about an interaction or message, or website content
- realise that what they create, post, and share online creates a digital footprint, which potentially shapes their online reputation.



## APPENDIX B

### Personal Care and Toileting

There are times when children, based on their age or special educational needs, who are in the care of **ISCT** are unable to address various care protocols for themselves and therefore need adult support. Examples include, but are not limited to, adult support with dressing and undressing, helping a child use the toilet, or cleaning private parts of the body.

This policy aims to empower staff members responsible for the personal care of children to always do so in a professional manner, and respect and uphold the privacy and dignity of the child. All hygiene and safety practices used are consistent with recommendations from the UN Convention on the Rights of the Child and best-accepted practices.

All members of staff need to remain vigilant and report any concerns about the safety and welfare of children, including but not limited to unusual marks, bruises or injuries to the DSO.

#### Areas to consider.

##### 1. The Child's Need to be Helped

- The understanding of the developmental nature of the child and matching this particular care with their personal development and needs. Although the child should be assisted where necessary, there is also a realisation that the child needs to develop independence. The best practice for this to be done, is in consultation with the home to maintain consistency of practice and expectations. When a child shows an increased desire or ability to dress themselves, this should be communicated to enable consistency. This would also include toilet routines and training.
- The amount of clothing removed should be appropriate to the weather and needs of the child at that moment. The changing process should be uninterrupted and done as considerately as possible. The child should not be left partially clothed or unclothed. In all this, the child's comfort and needs must be paramount.
- Changes in clothing and spare underwear should be packed daily by the parents / or guardian as needed. All items needed for a change should be fetched prior to the changing moment to ensure a seamless process. All soiled or dirty clothing should be sent home and clean changes should be provided the following day.
- Whenever a child is needing to be changed, they are approached gently and an explanation for why they are needing to be changed is always vocalised.



This is important for enforcing body autonomy and for them to recognise when they need a change.

- Conversation with a child regarding their personal care should always be polite, including when less personal instances such as face washing or hand washing are needed. Healthy communication is always encouraged.

## **2. Other Adults Present**

- The child's dignity and privacy needs must be considered when there are adults present that are not of the family of that child. Only staff who are cleared to be present during assisted bathroom use may be present. Consistency and clarity on this cannot be clouded by home practice or perceived cultural norms.
- The Rule of Two is particularly important in this regard. No staff member providing personal care to a child may do so if there is not another adult who is in observable distance. This is both for the safety and safeguarding of the child and the staff member.
- Cameras, CCTV, and mobile phones will not be allowed in areas that are used by children for toilet or changing purposes.
- The language used at school to identify personal body parts or elements of the personal care process must be communicated to the parents.
- Parents should be requested to have open conversations with their children about changing and times of personal care. This develops an environment of openness around these personal times and ensures transparency.
- Parents / Guardians who have any concerns about the process or language used during the changing process or personal care time must be encouraged to raise those issues as soon as possible with the school management.



## APPENDIX C

### General Personal Care Parental Consent Form

This form is to be completed by the parents on arrival in Nursery and Reception.

Name of child: \_\_\_\_\_

The Parent/Guardian

- ✓ I have read and understood the Personal Care Policy.
- ✓ I agree to ensure my child is toilet trained before entering ISCT.
- ✓ I understand and agree with the procedures that will be followed if my child is changed at school.
- ✓ I agree to inform the school should my child have any marks or rashes.
- ✓ I understand that if my child has an 'accident' at school, they will be changed in line with this policy.

Signature of Parent/Guardian: \_\_\_\_\_





**APPENDIX D**

**Record of Concern**

<b>Pupil's Name:</b>		
<b>Date of Birth:</b>		
<b>Victim Name:</b>		
<b>Key Stage and Year:</b>		
<b>Is the pupil aware this form is being completed?</b>	<b>Yes</b>	<b>No</b>
	<input type="checkbox"/>	<input type="checkbox"/>
<b>If not, why not:</b>		
<b>If yes, pupil reaction:</b>		
<b>Your name:</b>		
<b>Date:</b>		
<b>Time:</b>		
<b>Signature:</b>		

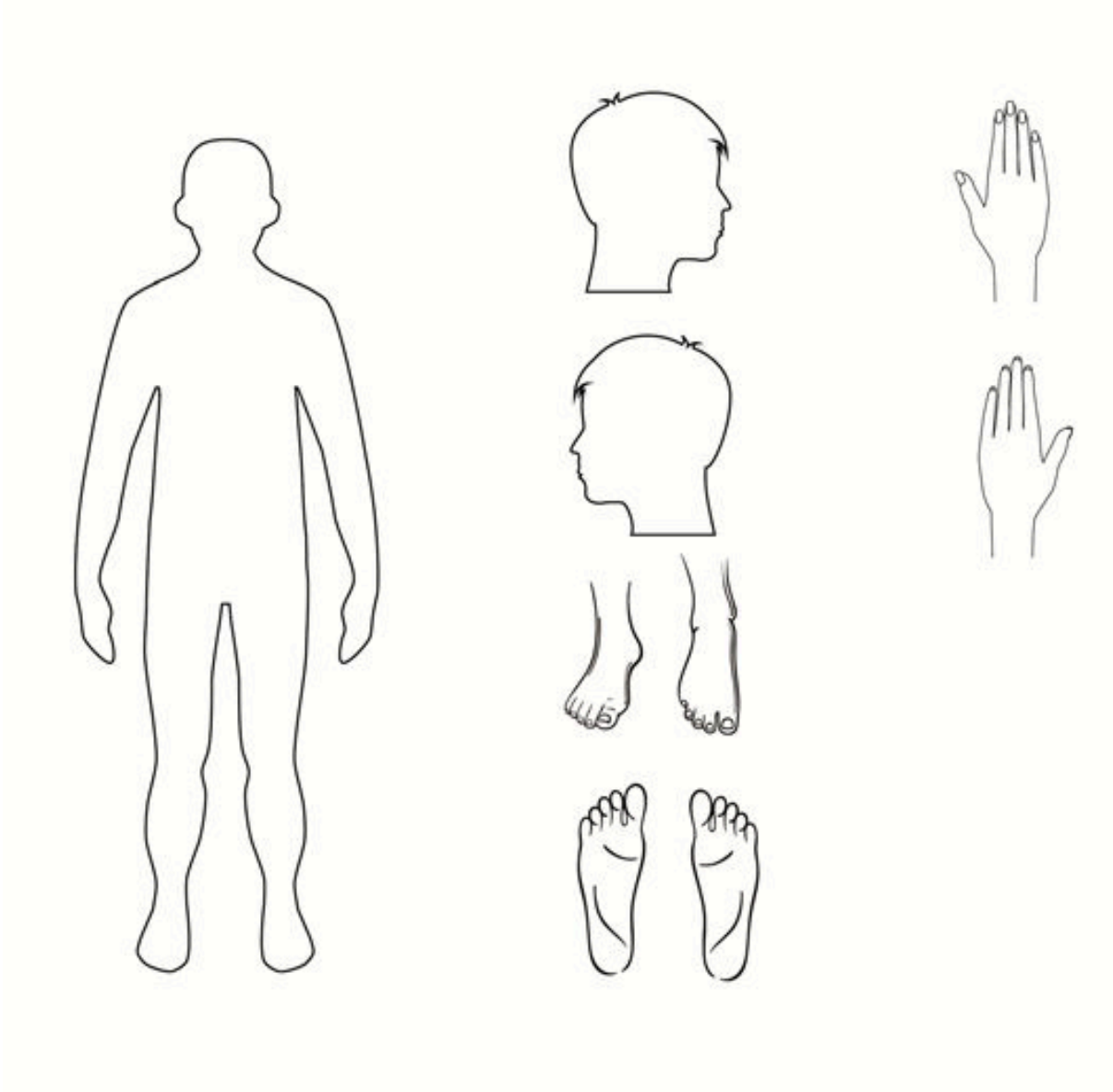
<b>Concern</b>	<b>Date:</b>
<b>Please describe the issue fully including dates, names, reported allegations, observations of behaviour, injuries etc:</b>	
<b>*** Body Map attached on the final page to record any visible physical marks.</b>	



<b>Signed:</b>	<b>Date:</b>
<b>The following section is to be completed by the Designated Safeguarding Team members only.</b>	
<b>Initial Actions:</b>	<b>Date:</b>
<b>Signed:</b>	<b>Date:</b>
<b>Follow-up Actions:</b>	<b>Date:</b>
<b>Signed:</b>	<b>Date:</b>
<b>Conclusions/Outcome:</b>	<b>Date:</b>
<b>Signed:</b>	<b>Date:</b>



**Body Map - please circle any areas that have visible marks on and record a brief description - e.g. colour of a bruise.**





## Appendix E

### Employee Safeguarding Declaration From

The Safeguarding Declaration must be signed by all school employees and a copy retained in their personnel file (hard copy on file or uploaded to the school's database system, as applicable). A copy must be provided to the employee for their records.

**I state that I understand, and will abide by, the contents of the International School of Cape Town's Child Protection Policy and Education Development Trust's Global Safeguarding Policy at all times.**

**Name:**

**ID/Passport Number:**

**Role:**

**Line Manager:**

**Signature:**

**Date:**