

Child Protection Policy

How we keep every learner safe, online and in our care.

Version 1.0 · Effective 15 October 2026

The best interests of the child govern decisions. Suspected harm is escalated without delay; statutory reports go to the competent external authorities, not merely to an internal manager.

Applies to: Every adult who teaches, supervises, supports, recruits for or otherwise has access to learners under 18.

Document reference BE-SAFE-006 · Reviewed annually and whenever the law or our practice materially changes.

Commitment, scope and duty of care

Bateleur Education (Pty) Ltd maintains zero tolerance for child abuse, sexual exploitation, grooming, corporal punishment, bullying, harassment or retaliation. This policy covers live online lessons, recordings, digital chat, learning platforms, third-party tutors, remote assessment, education-related communication and any in-person educational event.

A child is generally a person under 18. The Constitution, Children's Act 38 of 2005 and other applicable child-protection law guide responses. Children's safety takes priority over reputation, commercial interests, or informal promises of confidentiality.

Safeguarding leadership and accountability

- Management appoints a named safeguarding lead and a deputy with direct access to a director. Their current names, approved contact routes and availability procedures must be given to staff and families in a separate safeguarding contact notice.
- The safeguarding lead records incidents, coordinates immediate protection, ensures mandatory external reports, maintains restricted files and follows up on action. A child or reporter may bypass the lead where that person is implicated or unavailable.
- All staff, volunteers and contractors must report concerns. Internal referral does not substitute for an individual's personal legal obligation to report to authorities.

Safer recruitment and vetting

Before allowing an adult to work with or have access to children, Bateleur must complete identity and reference checks, assess any legally necessary qualification or professional registration, and undertake all applicable checks against Part B of the National Child Protection Register and the National Register for Sex Offenders, following prescribed procedures and legal duties. Staff must disclose legally relevant restrictions and sign the code of conduct and confidentiality undertaking.

Access must not be granted while mandatory screening is outstanding unless a legally compliant safeguarding arrangement permits it. Vetting is repeated or reviewed when required by law and risk. Recruitment records are confidential and kept in accordance with POPIA.

Adult conduct and professional boundaries

- Communicate with minors through approved organisational accounts and monitored/supervisable learning channels; avoid private disappearing messages, hidden accounts or informal social-media relationships.
- Never request or share intimate images, make sexual comments, engage in romantic/sexual relationships, solicit secrecy, give inappropriate gifts or arrange unauthorised private meetings.
- One-to-one virtual lessons must be scheduled, traceable and conducted through an approved account. Where reasonable, provide guardians with session visibility and enable organisational oversight; avoid unnecessary intrusion into a learner's privacy.
- Do not use physical punishment, humiliating discipline, intimidation, discriminatory remarks or threats. Reasonable discipline must be proportionate, documented and child-centred.
- Staff may not communicate beyond approved hours except where legitimate safety needs justify it and the contact is documented.

Online safety and recordings

Class links must not be posted publicly. Use access controls, appropriate waiting-room or authenticated join measures, managed screen-sharing, participant controls and clear moderation. Record only authorised sessions with appropriate notice and access restrictions; recordings must not be downloaded, edited, used for entertainment or redistributed without lawful authority.

Where an online learner discloses danger or displays indicators of imminent self-harm, abuse or exploitation, respond promptly and respectfully, establish enough information for immediate safety, notify appropriate emergency professionals/authorities and document actions. Do not promise secrecy. Online delivery does not remove safeguarding duties.

Recognising and receiving concerns

Potential indicators include unexplained injuries, a marked change in behaviour, explicit disclosures, sexually inappropriate adult contact, concerning messages, repeated online harassment or a child becoming fearful of a particular adult. An indicator alone is not a conclusion; act on reasonable concern.

- Listen calmly, take the child seriously, use open prompts rather than leading investigative questions and do not interrogate, confront the alleged perpetrator or attempt to obtain forensic evidence.
- Record the child's words as closely as possible, time, context and any immediate risk. Preserve messages and digital evidence lawfully without forwarding intimate material or conducting an amateur investigation.
- Explain, in age-appropriate language, that information will be shared only with those needed to keep the child safe or fulfil the law.

Immediate protection and mandatory reports

If a child faces immediate danger, contact the South African Police Service and appropriate emergency services without delay. If online, seek the learner's current location through proportionate safe means. Notify a non-implicated responsible guardian unless doing so may increase risk or compromise a lawful investigation.

Children's Act section 110: where a professional in a prescribed category, including a teacher, concludes on reasonable grounds that a child has been sexually abused, physically abused causing injury, or deliberately neglected, that person must report in the prescribed manner (Form 22) to the provincial Department of Social Development, a designated child-protection organisation or a police official, as applicable.

Sexual Offences Act section 54: any person with knowledge of a sexual offence committed against a child must immediately report it to a police official. Different rules may apply to a person with a mental disability. Bateleur must not require internal approval before these statutory reports.

A reasonable welfare concern below a compulsory-reporting threshold may still warrant safeguarding consultation and lawful referral. Record the external authority contacted, date, reference number and next steps.

Allegations against staff, contractors or learners

Where an adult is accused, management must promptly assess necessary interim protections, including supervision, restricted access or suspension consistent with employment law and fairness. The accused must not have access to the complainant's confidential file. Do not conduct an internal process that delays required police or statutory reporting.

Where child-on-child harmful behaviour arises, protect all affected children, assess context and capacity, avoid labelling or humiliating the children, and involve appropriate authorities and guardians when lawful and safe. Retaliation against a complainant, reporter or witness is prohibited.

Data protection, escalation and training

Safeguarding records are confidential, stored with enhanced access restrictions and retained under a documented legal-preservation schedule. Staff complete induction and regular refresher training, including grooming indicators, online boundaries, recording rules, disclosure handling and mandatory-reporting duties.

Routine concerns may be sent to info@bateleureducation.co.za, clearly marked "Confidential safeguarding". For emergencies, do not rely on an email response: contact police or emergency services immediately. This channel is not a substitute for an independently designated safeguarding lead and deputy.

Review and child participation

Management reviews the policy at least annually and after any serious event or material legal change. Learners are informed, in age-appropriate language, how to report concerns safely and how to contact authorities without going through the alleged wrongdoer.

Legal and operational references

- [Children's Act 38 of 2005, particularly ss 110 and 123-126](#)
- [Criminal Law \(Sexual Offences and Related Matters\) Amendment Act 32 of 2007, s 54](#)
- [Department of Justice guidance: Child Protection Register and Sex Offenders Register](#)
- [Official child abuse reporting Form 22](#)