



**SAFEGUARDING /  
CHILD PROTECTION POLICY**



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## Introduction

This policy has been developed by the Valenture Institute.

The Valenture Institute has adopted this safeguarding policy ("Policy") and as part of this Policy, we have defined a set of procedures to follow when anyone has concerns about the safety of children as well as guidelines on related issues.

This Policy is global in scope and covers all children, young people and vulnerable adults who receive a service from the Valenture Institute.

## 1. Key objectives

- 1.1. Our primary consideration is to ensure that no student is at risk of abuse or is harmed.
- 1.2. Our key objectives are:
  - 1.2.1. Do all that we can to ensure that learners are not at risk of abuse when participating in the various environments of the Valenture Institute;



- 1.2.2. Identify potential risks to students when participating in an online learning environment and create and implement appropriate and effective guidelines for such engagement and processes to monitor and prevent or address any incidents in the online environment utilised by the Valenture Institute;
- 1.2.3. Do all that we can to ensure that all learners are free from sexual harassment while participating in the various environments of the Valenture Institute or while receiving a service from us – whether the harassment is from staff members, fellow students or contractors;
- 1.2.4. Recognise and take appropriate action when a child, young person or vulnerable adult might have been abused, including in the community or family; and
- 1.2.5. Create a safe space for students, parents and staff members to address safety concerns.
- 1.3. To meet our objectives, we commit to:
  - 1.3.1. comply with all relevant laws and regulations applicable in each country in which we operate;
  - 1.3.2. set overarching principles to help staff think about our safeguarding / child protection responsibilities;



- 1.3.3. define procedures and provide guidance on the safeguarding / child protection standards that we expect in all interactions related to the Valenture Institute and the actions that should be taken to avoid risk and to respond to cases of abuse;
- 1.3.4. communicate this Policy and guidelines to our staff members, contractors, parents and others who may be interested in our approach to safeguarding children;
- 1.3.5. ensure that all our staff are offered training to build their skills in preventing, identifying, responding and reporting cases of harm;
- 1.3.6. monitor and document performance and apply any learning from these Safeguarding / Child Protection Principles; and
- 1.3.7. report all serious incidents to the necessary authorities and officers.

## 2. Our safeguarding / child protection principles

- 2.1. Best interests of the student are paramount and shall be the primary consideration in our decision making.



- 2.2. We are learner centred and have adopted a rights-based approach. This helps us keep the rights (to care, nurturing and equality of protection) of students, children and vulnerable adults sharply in focus in all our activities.
- 2.3. Equality of protection to ensure that students have the same positive opportunity and to engage in our activities safely regardless of their gender, ability, race, sexuality, ethnicity, religion, circumstances or age. Vulnerable children and adults require attention to optimise their safety needs and promote their access to important opportunities.
- 2.4. We take responsibility to meet our obligations regarding our duty of care to all our students. This means ensuring our products and services are safe and that we protect children and vulnerable adults across all our activities, environments and facilities.
- 2.5. We reject the use of child or forced labour in our educational activities and in our business relationships.
- 2.6. We make clear our standards to contractors and suppliers and audit those that we identify as being high risk.
- 2.7. 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.



- 2.8. 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 students and children and vulnerable adults.
- 2.9. We have a separate policy on protection of personal information. In general, except where there is an apparent immediate threat to life or limb, all personally identifiable information concerning students 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 Valenture Institute. Only individuals who have legitimate reasons to access the information can receive it.
- 2.10. We support and train those working within Valenture Institute to recognise and respond to student and parent concerns, and concerns in relation to child and vulnerable adult protection risks and incidences. We actively engage and educate students and parents on issues relating to safeguarding and emphasise risks and safety measures that apply in an online learning environment.
- 2.11. We have dedicated persons assigned to take responsibility for the protection of children and vulnerable adults in their engagement with us.



- 2.12. We work with others to protect children and vulnerable adults, including law enforcement or child welfare agencies where necessary. We require incidents relevant to this Policy in respect of all students to be reported in a timely way both internally and to the appropriate authorities, linked to proper recording of the relevant details.
- 2.13. Independent monitoring of the implementation of the Policy is important to us, and we will share our Policy with all relevant people and agencies.

### 3. Child abuse

- 3.1. Child abuse 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)) inflicting or failing to act to prevent harm.
- 3.2. Children may be abused in a family, institutional or community setting by those known to them or, more rarely, by others, and more recently via the internet.
- 3.3. Child abuse is physical abuse, sexual abuse, neglect or emotional abuse.





- 3.3.1. Physical abuse arises from any form of injury that it not accidental, such as throwing, hitting, burning, drowning, strangling, suffocating or otherwise intentionally causing physical harm.
- 3.3.2. 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.
- 3.3.3. 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 in so far 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.
- 3.3.4. 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.
- 3.3.5. Financial exploitation or abuse occurs through the improper or unauthorised use of the resources of a person for profit or gain.
- 3.3.6. 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.



## 4. Safeguarding procedures implemented by Valenture Institute

### 4.1. Student Code of Conduct and Honour Code

4.1.1. Students are required to strictly comply with the Valenture Institute's Student Code of Conduct and Honour Code which set out the principles, standards and rules applicable to their engagement with and related to Valenture Institute.

4.1.2. The Student Code of Conduct and Honour Code are strictly enforced by the Valenture Institute and the codes clearly set out the recourse that may be applied by Valenture where the codes are breached.

### 4.2. Participation in the online environment

4.2.1. The Valenture Institute's predominant manner of engagement with students is in an online environment, referred to as the Online Campus.

4.2.2. The nature of the Online Campus requires students and staff members to engage with one another in various situations, which include both individual and group education and tutorial sessions and discussion forums.



4.2.3. Discussion forums are closely monitored by the Deans of the Valenture Institute and live tutorial sessions are always facilitated by faculty staff members of Valenture Institute.

4.2.4. The online safety education initiative provided by Valenture Institute is aimed at educating students and parents on understanding how to stay safe and behave online.

4.2.5. Our online safety measures and education broadly focus on the following categories that may pose risk:

4.2.5.1. content: exposure to illegal, inappropriate or harmful material, such as pornography, fake news, racist or radical and extremist views;

4.2.5.2. contact: being subjected to harmful online interaction with other users, such as commercial advertising as well as adults posing as children or young adults; and

4.2.5.3. conduct: personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images, or online bullying.

### 4.3. **Anti-bullying**

4.3.1. 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 and it can be obvious or hidden and happens over time and repetitively. Bullying of any form or for any reason can have immediate, medium and long-term effects on those involved.

4.3.2. Bullying can occur in various forms:

4.3.2.1. Direct physical bullying such as hitting, kicking, tripping, pinching and pushing or damaging property.

4.3.2.2. Direct verbal bullying such as name calling, insults, teasing, intimidation, homophobic or racist remarks, or verbal abuse.

4.3.2.3. Indirect bullying is 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.

4.3.2.4. Cyberbullying is direct verbal or indirect bullying behaviours using digital technologies and includes:



- 4.3.2.4.1. Pranking such as anonymous, mocking or threatening phone calls or repeated hang ups.
  - 4.3.2.4.2. Image sharing, without permission, of unflattering or private images.
  - 4.3.2.4.3. 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.
  - 4.3.2.4.4. Using text and email to send insulting or threatening messages.
  - 4.3.2.4.5. Publishing personal, private or embarrassing information of another person online without permission, or spreading rumours online.
  - 4.3.2.4.6. Assuming someone's identity online and negatively representing them in a way that damages their reputation or relationships.
  - 4.3.2.4.7. Creating hate sites or implementing social exclusion campaigns on social networking sites.
- 4.3.3. The Valenture Institute takes the following approaches to bullying:



4.3.3.1. 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 students, parents and staff members.

4.3.3.2. We encourage student 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 student support services and active monitoring of all online environments of Valenture Institute.

4.3.3.3. We involve students, staff and parents in updating our safeguarding processes and strategies.

4.3.3.4. We work in partnership with students, staff and parents to reduce and manage bullying and respond to all incidents of bullying.

#### 4.4. **Background checks**

4.4.1. As required by applicable laws in the countries in which we provide our services, Valenture Institute 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.

4.4.2. 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 students in contravention of applicable laws.

#### 4.5. **Staff conduct and interactions with students**

4.5.1. While all Valenture Institute staff 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.

4.5.2. The Valenture Institute prescribes mandatory safeguarding training for all staff members and encourages staff to discuss any queries or concerns with the safeguarding coordinator or management.

4.5.3. All staff members and contractors should:

4.5.3.1. Perform all interactions and work with students in an open and transparent way in full compliance with this policy. Interactions with students should be limited to the premises of the Valenture Institute approved centres or the Online Campus, and where interactions occur elsewhere, parents and management should be informed beforehand.



- 4.5.3.2. Record incidents or decisions about any concerns in the performance of work and discuss or seek advice from the safeguarding coordinator or manager.
- 4.5.3.3. Apply the same professional standards to all work situations and students regardless of gender, race, disability, sexuality or any other characteristic.
- 4.5.3.4. Be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken.
- 4.5.3.5. Immediately report the circumstances of any situation which occurs with a student which may be subject to misinterpretation or may compromise professional ability to the safeguarding coordinator or manager.
- 4.5.3.6. Ensure any planned social contact with students is approved by senior colleagues and advise senior management of any regular social contact that the staff member has with a student.
- 4.5.3.7. Avoid any unnecessary physical contact with students and be prepared to explain any contact with a student and not hit or otherwise physically assault anyone.
- 4.5.3.8. Refrain from using language that will mentally or emotionally abuse or cause mental or emotional abuse.





- 4.5.3.9. Not act in any way that intends to embarrass, shame, humiliate, or degrade another person or the Valenture Institute or an awarding body.
- 4.5.3.10. Not develop a sexual relationship or engage in any sexual or personal conduct with a student or encourage an inappropriate attachment with a student, including kissing, hugging, fondling, rubbing, touching, grooming, dressing or exhibiting any form of sexualised behaviour in an inappropriate or culturally insensitive way.
- 4.5.3.11. Not suggest or 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 students.
- 4.5.3.12. Not stand aside when they see or are aware of inappropriate or bullying actions being inflicted on others.

## 5. Staff reporting procedures

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



- 5.1. **Concern that a student has been abused or harassed within their family, in their community, or in an online setting.**
- 5.1.1. If a student is in immediate danger, action appropriate to the circumstances must be taken, which could include calling the parents, police, medical services or other appropriate agencies.
- 5.1.2. Concerns about a student suffering or likely to suffer abuse or harassment should be reported to your manager or the designated safeguarding coordinator.
- 5.1.3. If, following a discussion with the safeguarding coordinator or your manager, there is still concern about the student, the safeguarding coordinator or the manager must contact an appropriate safeguarding agency and/or the police to address the concern.
- 5.1.4. You should consider whether to inform the student/parents about the concerns before contacting the police or a safeguarding agency, but parents of the student must not be informed if informing them will put the student at further risk of abuse.
- 5.1.5. Any concerns, discussions and decisions must be formally recorded in writing.



5.1.6. When reporting any concerns, you should ensure that the safeguarding agency or police give you appropriate information about how they will proceed and follow up on the report regularly.

5.2. **Allegations of abuse concerning a member of staff or a contractor.**

5.2.1. You should report all allegations or safeguarding concerns about a member of staff immediately to your manager or the safeguarding coordinator and formally record any concerns, discussions and decisions.

5.2.2. The safeguarding coordinator or your manager should take action immediately to ensure that all students are safe. Except in rare circumstances this should not include the removal or denial of a service to any student.

5.2.3. Where appropriate or required in terms of applicable laws, a referral will be made to the police or a safeguarding agency.

5.2.4. The safeguarding coordinator or your manager, will consider whether a disciplinary investigation in respect of the staff member is required.

5.2.5. 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 staff member or actions to reduce risk to students are required.
- 5.2.6. The relevant parents or guardians of any affected students must be informed. National laws and principles of confidentiality and data protection must be complied with however, all parents will need to know, at the appropriate time, that concerns have been raised about a staff member and that appropriate action has been taken. The staff member communicating with parents 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.
- 5.2.7. In the event that you feel your concerns are not being heard or are about your manager or the safeguarding coordinator, you can raise your concerns to the Registrar of Valenture Institute.
- 5.3. **Allegations of past abuse.**

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

- 5.3.1. Immediately report the information to the safeguarding coordinator or your manager and make a clear record of your concerns and actions taken.



- 5.3.2. Clarify whether there is any child or children who may currently be at risk from the alleged perpetrator.
- 5.3.3. 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.
- 5.3.4. Advise the adult to make a formal complaint to the police, explaining that there is a significant likelihood that a person who has previously abused a child will 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.
- 5.3.5. If following referral to a safeguarding agency or the police you remain concerned, you should consider with the safeguarding coordinator or your manager, escalating your concerns either within the Valenture Institute or an awarding body or with the police or a safeguarding agency.
- 5.3.6. Where it is believed that the alleged perpetrator has contact with a child, a referral should be made to a relevant safeguarding agency 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 to



risk to children and that the information that has been shared by the reporting adult will be shared by you or the safeguarding coordinator and a referral made to a safeguarding agency or the police. If the adult wishes for his/her 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 Valenture, the person making the allegation should be advised to contact the police or a safeguarding agency.

#### **5.4. Concerns about sexually harmful behaviour towards another child or young person.**

5.4.1. Harmful sexual behaviour includes:

5.4.1.1. using sexually explicit words and phrases;

5.4.1.2. inappropriate touching;

5.4.1.3. using sexual violence or threats; and

5.4.1.4. full penetrative sex with a child or a young person.

5.4.2. 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.

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

5.4.3.1. Report immediately to the safeguarding coordinator or your manager and make a clear record of the concerns.

5.4.3.2. Actions should be taken to ensure that all students are safe, including the student whose behaviour is of concern. This should not include the child/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.

5.4.3.3. The safeguarding coordinator or your manager should consider referring the concern to a safeguarding agency and/or the police and parents 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.

5.4.3.4. If following referral to a safeguarding agency or the police you remain concerned, you should consider with the safeguarding coordinator or your manager, escalating any concerns either within Valenture Institute or with the police or a safeguarding agency.



### 5.5. Reporting other safeguarding concerns.

- 5.5.1. If you are concerned about any harm that a student may be experiencing, such as sexual exploitation, bullying, abuse by gang activities and self-harm or suicide, you should speak to the safeguarding coordinator or your manager in order to consider whether to make a referral to a safeguarding agency or the police and about what actions should be taken to protect the student and when to inform the student's parents, and all concerns and actions taken should be clearly recorded.
- 5.5.2. Where the child or young person is in immediate danger, you should call the police, a relevant safeguarding agency or medical service.
- 5.5.3. Where there is a possibility of a criminal offence, the safeguarding coordinator must make a referral to the police.
- 5.5.4. If following a referral to a safeguarding agency or the police you are still concerned, you should consider with the safeguarding coordinator or your manager, escalating your concerns either within the Valenture Institute or with the police or a safeguarding agency.





## 6. Safeguarding coordinator

The Valenture Institute's safeguarding coordinator:

- 6.1. Name: Kerry Randall
- 6.2. Email: [kerry@valentureinstitute.com](mailto:kerry@valentureinstitute.com)
- 6.3. Contact number: +27212073894

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