



Policy Title	Safeguarding Policy				
Author	Deputy Head: Pastoral Care				
Type of document	Policy				
Policy number	MCP002 - 202510				
Date of first issue	2025.07				
Date of amendments	2025.10				
Date of approval by EXCO	2025.11				
Date of approval by SGB	2025.11				

SAFEGUARDING POLICY

Table of Contents

1. Preamble
2. Purposes of a Safeguarding Policy
3. Definitions
4. Vetting
5. Safeguarding Standards
6. Suspicion / Reasonable Belief of Abuse
7. Confidentiality Considerations
8. Responsibilities of the Headmaster
9. Educator Obligations
10. Learner Obligations
11. Parents or Guardians
12. Social Media
13. Conclusion

1. PREAMBLE

- 1.1. Maritzburg College (the school) is a public school for boys, offering both day and boarding facilities to learners from Grade 8 to Grade 12. As a public institution, Maritzburg College is governed by the South African Schools Act 84 of 1996, the Children's Act 38 of 2005, the Constitution of the Republic of South Africa, the South African Council for Educators Act 31 of 2000, and other applicable legislation and policy frameworks aimed at protecting and advancing the best interests of the child.
- 1.2. Maritzburg College serves a diverse population of boys with varying needs, backgrounds, and vulnerabilities. Whether enrolled as day scholars or boarders, all learners are entitled to a safe, respectful, and supportive environment in which their rights, dignity, and personal development are protected and promoted. The boarding context in particular presents unique safeguarding considerations, as learners are entrusted to the care of Maritzburg College beyond academic hours and often for extended periods.

- 1.3. Maritzburg College is unequivocally committed to safeguarding and promoting the welfare of every learner in its care. To achieve this, clear standards of conduct and best-practice safeguarding procedures must be implemented and maintained by all staff and adults working with or around learners. However, we recognise that no policy, no matter how thorough, can in itself guarantee the protection of learners from all forms of harm. It is for this reason that we commit to the regular review and continuous improvement of our safeguarding framework, guided by evolving best practices, legal obligations, and the lived experiences of our learners.
- 1.4. This Safeguarding Policy must be read in conjunction with the Staff Code of Conduct, which outlines standards of professional behaviour expected of all staff, as well as the Code of Professional Ethics issued by the South African Council for Educators (SACE). These instruments collectively establish the behavioural, legal, and ethical framework within which all employees are required to operate.

2. PURPOSES OF A SAFEGUARDING POLICY

- 2.1. The primary purpose of this policy is to ensure that all boys enrolled at Maritzburg College are protected from harm and that their safety, dignity, and wellbeing are consistently upheld within both the day and boarding school environments.
- 2.2. The policy aims to promote a clear understanding of what constitutes abuse, neglect, and inappropriate behaviour towards children, and to foster a culture of vigilance, responsibility, and accountability among all members of Maritzburg College community.
- 2.3. It seeks to ensure that every individual associated with Maritzburg College—including the Governing Body, school management, academic and support staff, learners, and affiliated service providers—takes all reasonable and proactive measures to prevent abuse and promote a safe environment for all learners.
- 2.4. The policy exists to ensure that no person within Maritzburg College community engages in any action or omission that may enable or contribute to the occurrence of abuse or compromise the safeguarding of learners.
- 2.5. It provides a framework for ensuring that all safeguarding concerns, suspicions, and allegations are addressed promptly, respectfully, and in a manner that is legally compliant and procedurally fair, including the obligation to notify the relevant statutory authorities where such a duty arises.

- 2.6. The policy outlines the procedures to be followed in cases where allegations or concerns arise, including the internal and external investigative processes and the roles of various stakeholders involved.
- 2.7. It further sets out Maritzburg College's reporting obligations in terms of national legislation, including the Children's Act 38 of 2005, and its responsibilities in relation to the Child Protection Unit of the South African Police Service (SAPS), social services, and professional regulatory bodies such as the South African Council for Educators (SACE).
- 2.8. Maritzburg College is committed to ensuring that any learner who they are made aware of, who may have suffered abuse is provided with appropriate pastoral care, counselling, and emotional support in a compassionate and professional manner.
- 2.9. Finally, this policy affirms Maritzburg College's commitment to upholding both its legal and ethical responsibilities in relation to safeguarding, and to taking appropriate action where any conduct, event, or failure undermines the safety and wellbeing of learners under the care of Maritzburg College.

3. DEFINITIONS

- 3.1. **Child abuse** means any form of harm or ill-treatment deliberately inflicted on a child (under 18 years of age) and includes:
 - (a) assaulting a child or inflicting any other form of deliberate injury to a child;
 - (b) sexually abusing a child or allowing a child to be sexually abused;
 - (c) bullying by another child;
 - (d) a labour practice that exploits a child; or
 - (e) exposing or subjecting a child to behaviour that may harm the child psychologically or emotionally.
 - (f) Grooming a child
 - (g) Neglect
- 3.2. **Consent** means a voluntary or uncoerced agreement that can be given through words or actions. It cannot be forced or given under duress. A child as defined in section 1(1) of the Criminal Law Amendment Act, who is below the age of 12 has no capacity to consent to sexual conduct of any manner, therefore, sexual intercourse with a child below the age of 12 constitutes a rape under the law, even if the child allegedly factually consented. A child between the ages of 12 and 16 can consent, but with consequence for the other party if that person is 18 years or older. A learner may never consent when it is in reference to the prohibited conduct of an educator;

3.3. **Harassment** means directly or indirectly engaging in conduct that the respondent knows or ought to know:

- a) causes harm or inspires the reasonable belief that harm may be caused to the complainant or a related person by unreasonably:
 - i. following, watching, pursuing or accosting of the complainant or a related person, or loitering outside of or near the building or place where the complainant or a related person resides, works, carries on business, studies or happens to be;
 - ii. engaging in verbal, electronic or any other communication aimed at the complainant or a related person, by any means, whether or not conversation ensues; or
 - iii. sending, delivering or causing the delivery of letters, telegrams, packages, facsimiles, electronic mail or other objects to the complainant or a related person or leaving them where they will be found by, given to or brought to the attention of, the complainant or a related person; or
- b) amounts to sexual harassment of the complainant or a related person.

3.4. **Sexual Abuse** in relation to a child means:

- a) sexually assaulting a child or allowing a child to be sexually assaulted;
- b) encouraging, inducing or forcing a child to be used for the sexual gratification of another person;
- c) using a child in, or deliberately exposing a child to, sexual activities or pornography; or;
- d) procuring, or allowing a child to be procured for, commercial sexual exploitation or in any way participating or assisting in the commercial sexual exploitation of a child.
- e) Grooming

3.5. **Sexual Harassment** means:

- a) unwelcome sexual attention from a person who knows, or ought reasonably to know, that such attention is unwelcome, it can be peer on peer or adult to child;
- b) unwelcome explicit or implicit behaviour, suggestions, messages or remarks of a sexual nature that have the effect of offending, intimidating or humiliating the complainant or a related person in circumstances, which a reasonable person, having regard to all the circumstances, could have anticipated that the complainant or related person would be offended, humiliated or intimidated;

- c) implied or expressed promise of reward for complying with a sexually-oriented request; or
- d) implied or expressed threat of reprisal or actual reprisal for refusal to comply with a sexually-oriented request.

This may include unwelcome physical contact, verbal or non-verbal conduct. It may include discriminatory or offensive behaviour on the basis of the gender or sexual orientation of a person. Sexual harassment is not limited to situations where an unequal power relationship exists between parties involved and can be committed by or against any person regardless of gender, sex or sexual orientation.

3.6. **Sexual offence** means any offence in terms of Chapters 2, 3 and 4 and sections 55 and 71(1), (2) and (6) of the Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007 and includes rape, compelled rape, sexual assault, compelled sexual assault and self-sexual assault, compelling or causing persons to witness a sexual offence, sexual acts or self-masturbation, Exposure or display of, or causing exposure or display of, genital organs, anus or female breasts ('flashing'), engaging sexual services, as well as incest, bestiality and sexual acts with a corpse. Abuse shall also be inclusive of attempting, conspiring, incitement or inducing another person to commit a sexual offence and trafficking in persons for sexual purposes.

3.7. **Sexual Misconduct** – All forms of sexual misconduct and inappropriate contact with learners are prohibited to all Maritzburg College, irrespective of their age.

3.8. **Grooming** – A deliberate process by which an individual builds a relationship of trust with a learner or vulnerable person (or their family) with the intention of exploiting them, most commonly for sexual purposes. Grooming may involve attention, favours, gifts, secrecy, desensitisation to inappropriate conduct, or manipulation, whether in person or online.

Grooming can be carried out by adults or by other children (peer-on-peer grooming). Child-on-child grooming involves similar patterns of manipulation and exploitation, where one learner gains trust and exerts influence or control over another, often making the victim feel complicit, confused, or fearful of speaking out.

Under the Sexual Offences Act 32 of 2007, grooming a child for sexual purposes is a criminal offence, regardless of whether it is committed by an adult or another child.

- 3.9. **Sexual penetration** as stipulated in the Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007 includes any act which causes penetration, to any extent whatsoever, by:
- a) the genital organs of one person into or beyond the genital organs, anus, or mouth of another person;
 - b) any other part of the body of one person or, any object, including any part of the body of an animal, into or beyond the genital organs or anus of another person; or
 - c) the genital organs of an animal, into or beyond the mouth of another person.

4. **VETTING**

- 4.1. In accordance with Section 123 of the Children's Act 38 of 2005, as amended, any person whose name appears in Part B of the Child Protection Register (CPR) is legally prohibited from working with or having access to children in any capacity.
- 4.2. Maritzburg College acknowledges the critical importance of conducting thorough pre-employment vetting to ensure that no person who poses a risk to learners is appointed to any position at the school. Failure to carry out appropriate vetting constitutes a serious breach of Maritzburg College's duty of care and may expose learners and staff to potential harm.
- 4.3. Should it be established that an employee appointed by Maritzburg College had a prior conviction or listing for offences of a similar nature, and the school failed to conduct proper vetting before such appointment, the school may be held liable for any resulting harm. This includes both civil and reputational liability.
- 4.4. Accordingly, Maritzburg College undertakes to vet all prospective employees—whether academic, administrative, residential, or support staff—against the Child Protection Register, the National Register for Sex Offenders, and relevant criminal records databases, prior to appointment. This obligation extends to volunteers, contractors, or any other persons who may have direct or unsupervised access to learners.
- 4.5. Maritzburg College reserves the right to withdraw an offer of employment or terminate employment where vetting processes reveal disqualifying information or where the employee fails to comply with screening requirements.

4.6. Police Clearance

4.6.1 Criminal Record and Register Clearance

4.6.1.2 Maritzburg College is committed to safeguarding and promoting the welfare of all learners. As part of this commitment, the school upholds a strict standard regarding the screening and clearance of all staff members—both teaching and non-teaching—who may have direct or indirect access to learners.

4.6.1.3 While the submission of a police clearance certificate is not explicitly required by law for all school employees, it is a mandatory requirement for registration with the South African Council for Educators (SACE). Accordingly, Maritzburg College requires all educators to submit a valid police clearance certificate before assuming duties, in line with SACE's registration and professional conduct requirements.

4.6.1.4 Police clearance checks assist in identifying any criminal history of a prospective employee. However, they do not indicate whether an individual is listed on the National Register for Sex Offenders (NRSO) or the Child Protection Register (CPR). These registers are maintained separately by the Department of Justice and Constitutional Development and the Department of Social Development, respectively, and are critical tools in the protection of children from abuse or exploitation.

4.7 In line with best practice, Maritzburg College not only requires police clearances for educators but also conducts additional register checks as part of its safeguarding procedures. Specifically, the school does the following:

4.7.1 Requires all prospective employees, including educators, administrative staff, hostel staff, support personnel, and any person who may have unsupervised access to learners, to provide a valid police clearance certificate at the time of employment.

4.7.2 Screens all prospective employees against the National Register for Sex Offenders (NRSO) to ensure that no individual listed on the register is employed in any role involving contact with learners.

- 4.7.3 Screens all prospective employees against the Child Protection Register (CPR) in accordance with the Children's Act 38 of 2005, to confirm that they are not deemed unsuitable to work with children.
- 4.7.4 Expects all external service providers, contractors, volunteers, and their staff and extracurricular facilitators to produce appropriate clearance documentation if their duties bring them into contact with learners.
- 4.7.5 Reserves the right to conduct renewed checks every two years, or at intervals determined necessary by Maritzburg College, to ensure ongoing suitability and compliance with safeguarding obligations.
- 4.7.6 No person will be employed or retained in a position at Maritzburg College if they are found to be listed on either the NRSO or CPR, or if they refuse to comply with the clearance processes required by the school. Where any concern arises following employment, the matter will be dealt with in accordance with the school's disciplinary policies and child protection procedures.
- 4.7.7 These measures reflect Maritzburg College's zero-tolerance approach to misconduct and its unwavering commitment to creating and maintaining a safe, respectful, and protective environment for all learners.

5. SAFEGUARDING STANDARDS

5.1 *Creating and maintaining a safe environment*

- 5.1.1 Maritzburg College is committed to maintaining a safe school environment by promoting a culture of safety and preventing or reducing the risk of harm to boys. Maritzburg College provides access to good role models whom the boys can trust and who respect, protect and enhance their spiritual, physical, emotional, intellectual and social development.
- 5.1.2 Maritzburg College will do this through:
 - a) Diligent and comprehensive recruitment processes.
 - b) Careful observation and implementation of the Code of Conduct for Staff.
 - c) Maintaining a safe environment and creating a safe space for boys to raise concerns and fears.
 - d) Implementing a framework that manages these incidents and works to resolve them.

- a) Diligent and comprehensive recruitment processes:
 - i. Maritzburg College follows effective recruitment and selection procedures including procuring two good written references, one from the most recent employer/institution (except in exceptional circumstances, where these are not available).
 - ii. Maritzburg College makes a note of its own assessment of the suitability of employees to work with boys and of all adults on the premises.
 - iii. Police clearance (and other legally required clearance in accordance with National Registers) for all employees and volunteers will be sought and regularly updated.
 - iv. All job applicants will be asked if they have allegations or convictions relating to the abuse of children. Regardless of the response, the National Registers will be checked.
 - v. South African Council of Educators (SACE) will be contacted to make sure that the person is legally registered as an educator, and that there are no complaints against that person.

- b) Careful observation and implementation of the Code of Conduct for Staff:
 - i. Maritzburg College has a responsibility for ensuring that all who work with boys agree to follow effective safeguarding practices and annually, electronically agree to the staff Code of Conduct.
 - ii. A Code of Conduct including clear procedures are in place for all in Maritzburg College community.
 - iii. Maritzburg College has a clear and concise guide of what is (and is not) acceptable behaviour and practice for adults working with young people.
 - iv. In order to encourage positive behaviour amongst boys, Maritzburg College has a clear and concise guide of acceptable behaviour.

- c) Maintaining a safe environment and creating a safe space for boys to raise concerns and fears.
 - i. Maritzburg College explains and implements effective practice for the appropriate use of information technology, including social media use by staff and boys.
 - ii. Putting in place ground rules for adult one-to-one contact with boys, to ensure that it takes place in certain defined circumstances and for a specific and legitimate purpose.

- iii. This may include the improved use of CCTV footage and other technological advances in and around the school environment.
 - iv. Maritzburg College applies strict safety standards in the use of technology, including the internet, texting, email, WhatsApp, photography, CCTV and webcams.
 - v. There is a Designated Safeguarding Lead Anthony Sparrow, Deputy Pastoral Care, who has a clearly defined role and responsibility for safeguarding boys.
 - vi. External groups using the Maritzburg College property comply with effective safeguarding practice.
- d) Implementing a framework that manages these incidents and works to resolve them.
- i. Regular training of employees and contractors.
 - ii. Understanding the legal principles related to the reporting of incidents and the impact of the Child Protection Act and the Sexual Offences Amendment Act.

5.2 Responding to known, suspected or alleged abuse of boys

Maritzburg College follows legally compliant, clear procedures and guidelines on what to do when knowledge, suspicions, concerns or allegations arise regarding a boy's safety or welfare.

5.2.1 Maritzburg College implements the following:

- a) Maritzburg College implements the following safeguarding measures to ensure the protection and well-being of all boys at Maritzburg College:
 - i. Clear, legally compliant safeguarding procedures are in place, providing step-by-step guidance on actions to be taken where there is knowledge of, or allegations or suspicions of, abuse of a learner.
- b) Mechanisms exist for the reporting of suspected incidents and raising of concerns by boys, staff, parents, and other members of Maritzburg College community. These include:
 - i. Immediate and effective response to allegations in compliance with Maritzburg College's safeguarding requirements.
 - ii. Availability of official forms for the recording of safeguarding incidents.
 - iii. Support and assistance to personnel in raising concerns about potentially dangerous or unethical conduct towards boys.

- iv. Staff awareness of their obligation to report any suspected cases of abuse through appropriate internal channels.
 - v. Clear understanding among all stakeholders of what constitutes abuse.
 - vi. Appointment of a designated person with clearly defined roles and responsibilities for managing all cases of abuse, including historical cases.
 - vii. The names, duties and contact details of those responsible for safeguarding are readily accessible and known to all staff.
- c) Safeguarding procedures are actively promoted and made available to Maritzburg College community, including learners, staff, parents, and volunteers. In support of this:
- i. Registers of all workshops attended by staff are kept up to date.
 - ii. All staff are issued with copies of safeguarding policies, and a register of receipt is maintained.
- d) There are established mechanisms for investigating and addressing suspected incidents and concerns in a sensitive and confidential manner, ensuring that the rights of both the affected boys and other parties involved are respected. These include:
- i. The Headmaster will appoint an appropriately trained person to investigate any allegations.
 - ii. Based on the nature and circumstances of the allegation, the Headmaster will inform the parents or legal guardians of the learner concerned and discuss the intended course of action.
 - iii. Interviews may be conducted with the complainant, witnesses, and other involved parties.
 - iv. A written report outlining findings and recommended further action will be compiled by the investigator.
 - v. This report will be submitted to the Headmaster, who will determine any further reporting or disciplinary action and ensure compliance therewith.
 - vi. The Headmaster will ensure that appropriate support is provided to the complainant and that all efforts are made to safeguard their wellbeing.
 - vii. All incidents, allegations and referrals are recorded and documented.
- e) The Maritzburg College ensures that its reporting procedures comply with both legal and ethical obligations. This includes:
- i. Adherence to legislative requirements for reporting safeguarding concerns to external authorities, in a timely and sensitive manner.

- ii. Reporting of concerns to the appropriate professional bodies, where applicable.
- f) Record-keeping obligations are taken seriously, including:
 - i. Maintaining accurate records of investigations and outcomes, securely stored, including details of any decision not to report an incident.
 - ii. Keeping a comprehensive incident file documenting every safeguarding incident, allegation, referral and report.

5.3 Access to Support and Information

5.3.1 Maritzburg College will ensure access to support and information to anyone who discloses abuse, who alleges that abuse has taken place or who is alleged to have perpetrated abuse. The school is aware of how distressing abuse is and the difficulties associated therewith: Maritzburg College will make sure that anyone affected by abuse will know where they can go to receive help and advice.

- a) Such support mechanisms include:
 - i. Appropriate pastoral care is available.
 - ii. Information about sources of support is available.
 - iii. There is a procedure for responding to safeguarding suspicion, concerns, knowledge of allegations and a timeframe for dealing with them.
 - iv. Support of anyone who discloses abuse or who alleges that abuse has taken place. This will be offered by Maritzburg College management as appropriate.
 - v. Support of someone who is alleged to have perpetrated abuse involves informing the potential abuser that they have a right to seek legal advice.

5.4 Training and Support

5.4.1 Those who work with boys in the sphere of safeguarding are trained and supported in all aspects of safeguarding relevant to their role, in order to develop and maintain the necessary knowledge, attitudes and skills to safeguard boys. These measures include:

- a) Maritzburg College ensures that all staff are inducted and trained in the Safeguarding Policy and Procedures and how this ties in with the Code of Conduct.

- i. All members of staff have signed a document acknowledging the Safeguarding Policy
- ii. Appropriate training to ensure an understanding of the legal obligations and legislation addressing child protection issues and sexual offences, particularly involving minors.
- iii. All staff are given the opportunity to learn about how to recognise and respond to concerns about abuse.
- iv. Maritzburg College annually identifies those who need training.
- v. Maritzburg College keeps a clear record of training, outlining the topic of the training and when it was attended and by whom.
- vi. Maritzburg College identifies annually what its training needs are and ensures regular ongoing training.
- vii. Maritzburg College's budget allows for training to take place.

b) Education initiatives aimed at educating the boys on:

- i. Child protection issues and safeguarding measures available within the school.
- ii. Support structures and avenues for boys to raise their concerns and ventilate any safeguarding concerns and issues.
- iii. This will also be age specific and sensitive to different relationships and social dynamics.

5.5 Communicating the Safeguarding Policy

This ensures that all people involved in Maritzburg College are aware of the Safeguarding Policy.

5.5.1 The following measures will be put in place:

- a) This Safeguarding Policy is displayed in suitable places in the school.
- b) Appropriate contact details for the following are displayed:
 - i. The Designated Person .
 - ii. Support channels, including the School counsellor.
- c) Maritzburg College communicates the Safeguarding Policy to boys in a manner that is accessible and appropriate.

- d) Parents, boys and others are informed about the safeguarding as well as about procedures for reporting suspected abuse. Maritzburg College is clear about its responsibility to protect boys and makes this known to all who come into contact with Maritzburg College.

6. SUSPICION / REASONABLE BELIEF OF ABUSE

- 6.1. All staff members at Maritzburg College have a legal and ethical duty to act when they suspect that a learner may be experiencing any form of abuse, neglect, or exploitation. The responsibility to report is personal and cannot be delegated. The following procedures must be followed when there is a reasonable suspicion or belief that abuse has occurred or is occurring:
 - 6.1.2. As soon as a staff member suspects that a learner may be a victim of abuse, they must begin to gather and document relevant information. This process must be carried out consistently and discreetly. All information collected must be treated as strictly confidential.
 - 6.1.3. The staff member must immediately report their suspicions, along with any supporting information, to the Headmaster or designated safeguarding lead. This must be done without delay unless the Headmaster is directly implicated, in which case the matter should be escalated to the Chairperson of the Governing Body or another appropriate authority.
 - 6.1.4. A dedicated and confidential file must be opened for the learner concerned. This file must be clearly marked, securely stored, and accessible only to authorised individuals involved in the safeguarding process. It must be kept in a locked cabinet or secure digital platform with restricted access.
 - 6.1.5. Staff members must at all times remain objective, focusing on factual observations and avoiding assumptions or subjective interpretations.
 - 6.1.6. All matters relating to suspected or confirmed abuse are to be treated with the highest level of confidentiality. Disclosure must be limited strictly to those directly involved in the reporting and protection process.
 - 6.1.7. Any reporting or investigative action must prioritise the safety, dignity, and emotional wellbeing of the learner at all times. The process must comply with the relevant statutory requirements, including those set out in the Children's Act and any applicable Department of Education guidelines.

- 6.1.8. Support must be offered to the affected learner and, where appropriate, to their family. This includes ensuring access to pastoral care, counselling, and referral to professional support services if needed.

7. CONFIDENTIALITY CONSIDERATIONS

- 7.1. The obligation to maintain confidentiality does not override the statutory duty to report suspected abuse or neglect in terms of the Children's Act 38 of 2005 and other applicable legislation. In particular, confidentiality may not be invoked to avoid mandatory reporting to child protection authorities or the South African Police Service.
- 7.2. Every learner has the right to have their dignity, privacy, and personal information protected. However, this right is not absolute and must be weighed carefully—particularly in relation to a learner's parents or guardians—against the child's best interests as required by section 7 of the Children's Act and section 28 of the Constitution.
- 7.3. Where a learner explicitly requests that a disclosure of abuse, or any sensitive matter, not be shared with their parents or guardians, Maritzburg College may maintain confidentiality only where there are objectively compelling and justifiable reasons to conclude that it would be in the learner's best interests to do so. This determination must consider the learner's age, maturity, capacity to understand the implications of their request, and any potential harm that may arise from disclosure to their parents.
- 7.4. Confidentiality must not be maintained where doing so would likely result in harm to the learner or to another individual. Where a risk to life, safety, or wellbeing is identified, disclosure is necessary and appropriate, and the learner's request for confidentiality cannot override this obligation.
- 7.5. In cases where Maritzburg College determines that confidentiality cannot be maintained despite the learner's request, the learner must be informed of this decision in a timely, respectful, and developmentally appropriate manner. Where possible, the learner should be involved in planning how the disclosure to parents or authorities will take place.

8. RESPONSIBILITIES OF THE HEADMASTER

- 8.1. The Headmaster of Maritzburg College holds ultimate accountability for the implementation, management, and maintenance of this Safeguarding Policy and the related procedures set out herein.
- 8.2. The Headmaster may delegate the responsibility for investigating and dealing with safeguarding concerns to the Deputy Headmaster, Pastoral.

- 8.3. The delegated authority will keep the Headmaster apprised of his investigation at all stages.
- 8.4. In fulfilling this responsibility, the Headmaster or his delegate must:
- 8.4.1. Ensure that all educators employed by Maritzburg College are aware of and understand their duty of care towards all learners, acting *in loco parentis*;
 - 8.4.2. Make all permanent and contract staff aware of their legal and ethical duty to report any incident or suspicion of sexual abuse or harassment involving a learner;
 - 8.4.3. Ensure that any incident or suspicion of sexual abuse or harassment is reported within 24 hours, where possible, in accordance with the Protocol for the Management and Reporting of Sexual Abuse and Harassment in Schools. All reports must be made while safeguarding confidentiality, ensuring that the identities of both the victim and the alleged offender remain strictly protected.
 - 8.4.4. Facilitate the immediate referral of the learner to appropriate psycho-social support services where deemed necessary;
 - 8.4.5. Regularly revise, evaluate, and ensure consistent implementation of Maritzburg College's Code of Conduct, aligning it with all applicable legislation and safeguarding standards;
 - 8.4.6. Ensure that internal processes, including hearings, disciplinary proceedings, or tribunals (depending on the level of offence), are initiated and completed timeously and in accordance with due process;
 - 8.4.7. Promote, support, and actively participate in ongoing training and awareness initiatives for staff, learners, and parents relating to the prevention and management of sexual abuse and harassment.

9. EDUCATOR OBLIGATIONS

Educators at Maritzburg College are expected to:

- 9.1 Provide a safe, respectful, and private environment in which learners feel secure to disclose concerns, and to treat such disclosures with strict confidentiality;
- 9.2 Report any actual or suspected incident of sexual abuse or harassment to the Headmaster, or where the Headmaster is implicated, to the Chairperson of the School Governing Body;

- 9.3 Monitor and observe any changes in the learner's behaviour following a report, in support of the ongoing welfare of the learner;
- 9.4 Ensure that the procedures for reporting sexual offences are incorporated into relevant lessons and that learners are periodically reminded of these procedures;
- 9.5 Provide learners with accessible information, including contact details, for reporting sexual abuse or harassment.

10. **LEARNER OBLIGATIONS**

- 10.1 Learners are encouraged to report any incidents or suspected incidents of sexual abuse or harassment to a trusted adult at Maritzburg College. This may include the Headmaster, an educator, or any other staff member.
- 10.2 Learners should, where appropriate, seek the permission of the affected peer before disclosing an incident, while recognising that safeguarding obligations may override this discretion in certain cases.

11. **PARENTS OR GUARDIANS**

Parents or guardians should report any actual or suspected incidents of sexual abuse or harassment to the Headmaster, the relevant Grade Headmaster, Day or Boarding Master, a member of Maritzburg College Management Team or an educator.

12. **SOCIAL MEDIA**

- 12.1 Staff are reminded that sexual harassment and grooming may occur through digital and social media platforms, including through non-physical contact.
- 12.2 The Cybercrimes Act 19 of 2020 criminalises the distribution of data messages containing intimate images without consent.
- 12.3 Accordingly, any non-consensual sharing of sexually explicit or nude images or videos constitutes a criminal offence and may result in a fine, imprisonment of up to fifteen years, or both.

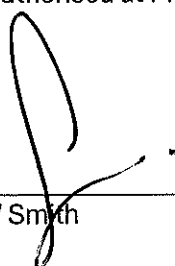
12.4 All employees, staff, interns, and educators must adhere to the following standards:

- 12.4.1 Do not accept friend requests, follows, or social media connections from current learners or former learners under the age of 18. Where platform settings prevent this, staff must remove or block such followers;
- 12.4.2 Notify the parents or guardians if a learner sends a friend request or social media connection request;
- 12.4.3 Communicate with parents through official school channels, using school email addresses;
- 12.4.4 Refrain from discussing school-related matters, including learners or staff, or posting school event photos on personal social media platforms;
- 12.4.5 Share only content that reflects positively on their professional standing and conduct;
- 12.4.6 Do not publicly identify themselves as being associated with Maritzburg College unless authorised to do so;
- 12.4.7 Use the highest possible privacy settings on all social media accounts.
- 12.4.8 Maritzburg College strongly upholds its Social Media Policy, which applies to all members of the Maritzburg College community. This policy sets out acceptable standards of online conduct and forms part of the safeguarding framework, ensuring that learners, staff, and all stakeholders engage responsibly and respectfully in digital spaces.

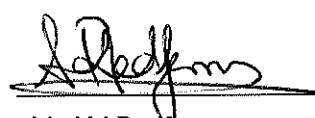
13 CONCLUSION

Maritzburg College acknowledges that safeguarding is not a static process but a continuous and evolving commitment. Maritzburg College remains steadfast in ensuring that every learner is protected through proactive, transparent, and responsive safeguarding practices. Through regular review, clear accountability, and sustained collaboration between staff, learners, parents, and the broader school community, Maritzburg College affirms its responsibility to provide a secure and respectful environment in which every boy can thrive. Safeguarding will continue to be a foundational pillar of Maritzburg College's ethos, governance, and operational planning.

Signed and authorised at Pietermaritzburg on 10 November 2025 by:



Mr W Smith Chairman: SGB



Mr AM Redfern Headmaster

