FOUR NOMADS

CHILD PROTECTION

Child Safeguarding and Protection Policy

What every person who works for Four Nomads must do to keep learners safe, how to recognise harm, and exactly what to do when something is wrong.

Issued under the **Children's Act 38 of 2005**, read with the **Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007** and section 28(2) of the Constitution of the Republic of South Africa, 1996.

ORGANISATION	Four Nomads NPC, a non-profit company incorporated in the Republic of South Africa
REGISTRATION NUMBER	2022/514801/08 (Companies and Intellectual Property Commission)
REGISTERED OFFICE	51 Boabab Street, Newtown, Louis Trichardt, 0920
DESIGNATED SAFEGUARDING LEAD	Ndivho Ramovha · ndivho@fournomads.org · info@fournomads.org
APPLIES TO	Every director, employee, volunteer, mentor, facilitator, intern and contractor who has any contact with learners
DOCUMENT REFERENCE	FN-SAFE-01
VERSION	1.0
DATE OF ISSUE	October 2026
NEXT SCHEDULED REVIEW	October 2027

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1 Why this policy exists

Four Nomads works with school learners, most of them under eighteen. We go into their schools, we run sessions with them, we photograph them, we message them, and we follow them for years. Every one of those things is an opportunity to do good, and every one of them is also an opportunity for a child to be harmed by somebody who has been given access to them.

This policy exists so that no one has to improvise. It says what is expected, what is forbidden, and what happens when a concern arises. It is not optional reading and it is not aspirational: it is a condition of working with Four Nomads in any capacity.

> **THE SINGLE RULE EVERYTHING ELSE SERVES**
>
> A child's best interests are of paramount importance in every matter concerning that child — section 28(2) of the Constitution. If this policy and a child's safety ever appear to point in different directions, the child's safety wins, and you tell the Designated Safeguarding Lead why.

It binds every director, employee, volunteer, mentor, facilitator, intern and contracted service provider of Four Nomads, whether paid or unpaid, full time or for a single afternoon. Partner schools and training providers are given a copy, and our agreements with them record that they have it.

2 Our commitments

Four Nomads commits to the following, and expects to be held to them.

- We treat the safety and wellbeing of every learner as more important than the programme, the photograph, the funder report or the reputation of this organisation.
- We screen every adult before they are given access to learners, and we do it again every three years.
- We never place an adult alone and unobserved with a learner where that can be avoided, and we design our sessions so that it can be avoided.
- We listen to learners. A child who says they are uncomfortable is believed and acted upon, not managed.
- We report. Where the law requires a report to the police or to social development, we make it — we do not investigate first, and we do not weigh it against what it might cost us.
- We do not use a learner's image or story in a way that could expose them to harm.
- We train everyone who works with learners before they start, and we refresh it annually.
- We keep a record of every concern raised and what was done about it.

3 The law we work under

PROVISION	WHAT IT REQUIRES
Constitution, s28(2)	A child's best interests are of paramount importance in every matter concerning the child.
Children's Act 38 of 2005, s1 and s17	A child is a person under 18. "Abuse" includes assaulting or deliberately injuring a child, sexually abusing or allowing a child to be sexually abused, bullying, labour exploitation, and exposing a child to behaviour that may harm them psychologically or emotionally.
Children's Act, s110(1)	Listed professionals — including **teachers**, social workers, nurses, medical practitioners, religious leaders, legal practitioners and staff or volunteers at a partial care facility, drop-in centre or child and youth care centre — who on reasonable grounds conclude that a child **has been abused in a manner causing physical injury, sexually abused, or deliberately neglected**, **must** report that conclusion, on the prescribed form, to a designated child protection organisation, the provincial Department of Social Development, or a police official.
Children's Act, s110(2)	**Any person** who on reasonable grounds believes that a child is in need of care and protection **may** report that belief to the same authorities.
Children's Act, s110(3)	A person who makes a report **in good faith** is not liable to civil action on the basis of the report.
Children's Act, ss 118–128	The **National Child Protection Register**. A person whose name appears in Part B is unsuitable to work with children. An employer must establish whether a prospective employee's name is in Part B before placing them in work involving children.
Children's Act, s150	Sets out when a child is **in need of care and protection** — including a child who has been abandoned or orphaned without visible means of support, who lives or works on the street, who is addicted to a dependence-producing substance without support, who is in a state of physical or mental neglect, or who is being maltreated, abused, deliberately neglected or degraded.
Sexual Offences Act 32 of 2007, s54(1)	**Any person** who has knowledge that a sexual offence has been committed against a child **must report** it **immediately** to a **police official**. Failing to do so is an offence. This duty binds everyone — it does not depend on your job title.
Sexual Offences Act, ss 42–50	The **National Register for Sex Offenders**. A person whose particulars are in the Register may not be employed in any capacity that places them in a position of authority, supervision or care of a child.
POPIA 4 of 2013	Governs how we handle the personal information generated by a safeguarding concern. Protecting a child takes precedence over a consent we hold — see section 12 of this policy.

Two duties, not one. Many Four Nomads facilitators are not in the section 110(1) list, so the mandatory Children's Act duty may not bind them personally. The section 54(1) duty under the Sexual Offences Act binds **everyone**, with no exceptions, and carries criminal liability. In practice Four Nomads treats both as binding on all of its people, and nobody should be weighing which list they fall into while a child is at risk.

4 Safe recruitment and screening

No adult is given access to learners before every step below is complete. There is no provisional access and no "just for this one session" exception.

#	STEP	WHAT IT MEANS
1	**Written application and CV**	Including a full employment and volunteering history with any gaps explained.
2	**Identity verification**	A certified copy of an identity document or passport, checked against the person in front of us.
3	**Two references**	Taken up directly, by telephone or email, with at least one from a role involving children where the person has held one. We ask every referee, in these words: *"Is there any reason this person should not work with children?"* and we record the answer.
4	**Criminal record check**	Through an accredited provider.
5	**National Child Protection Register, Part B**	Clearance confirmed through the Department of Social Development.
6	**National Register for Sex Offenders**	Clearance confirmed through the Department of Justice and Constitutional Development.
7	**Interview**	Including at least one direct question about attitudes to working with children and about boundaries.
8	**Signed undertakings**	This policy, the Code of Conduct in section 6, and the Confidentiality Undertaking.
9	**Induction**	Safeguarding briefing before the first session, delivered by the Designated Safeguarding Lead or a person they nominate.

4.1 Rechecking

Screening is repeated every three years for anyone still working with learners, and immediately if we become aware of anything that would have affected the original decision. A person must tell the Designated Safeguarding Lead, without delay, if they are charged with or convicted of any offence, or if any finding is made against them in relation to a child. Failing to disclose is itself a ground for removal.

4.2 Where a check cannot be completed

If a clearance is delayed through no fault of the applicant, they may be given a role that involves **no unsupervised contact with learners whatsoever**, recorded in writing by the Designated Safeguarding Lead, until the clearance arrives. This is the only permitted variation, and it is not available to anyone whose references raised a concern.

5 Code of conduct — what is expected

Everyone working with learners must:

- treat every learner with respect, and apply the same standards regardless of their sex, background, language, ability or circumstances;
- work in the open — in sight of another adult, in a room with the door open or a window onto a corridor, in a space the school has approved;
- plan sessions so that one-to-one contact is unnecessary, and where it is unavoidable, make sure another adult knows where you are and for how long;
- use the learner's name, and let the learner set the limits of physical contact — a handshake or a high five, nothing more;
- challenge bullying, humiliation and discrimination between learners rather than treat it as normal;
- record and report any injury, accident or incident on the day it happens;
- report a concern about a colleague as readily as a concern about anyone else.

6 Code of conduct — what is never acceptable

The following are prohibited absolutely. Any one of them is a ground for immediate removal from the programme and, where the law requires it, a report to the authorities.

- **Any sexual conduct, language or contact with a learner**, or any conduct that could reasonably be understood as sexual. The learner's apparent willingness is irrelevant and is not a defence.
- **Hitting, shaking, shoving or any other physical punishment**, or any physical response other than the minimum force genuinely necessary to prevent immediate injury.
- **Humiliating, shouting at, mocking, belittling or threatening a learner**, or using language that demeans them.
- **Being alone and unobserved with a learner** where it was avoidable, or in a vehicle, a private room, your home, or a learner's home.
- **Private digital contact** — messaging a learner from a personal number or personal social media account, adding a learner as a friend or follower on a personal account, or communicating outside the approved channels in section 7.
- **Photographing or filming a learner on a personal device**, or storing images of learners anywhere other than Four Nomads' own storage.
- **Giving a learner money, gifts, lifts, alcohol, tobacco, vaping products or any drug**, or doing anything for a learner of a personal nature that they can do for themselves.
- **Working with learners while under the influence** of alcohol or any substance that impairs judgement.
- **Developing or pursuing a relationship with a learner or their family** that goes beyond the programme, or using your position to obtain a personal, financial or sexual advantage.
- **Promising a learner that you will keep a disclosure secret.** You cannot keep that promise and you must not make it.

> **IF YOU BREACH A BOUNDARY BY ACCIDENT**
>
> Tell the Designated Safeguarding Lead the same day, in writing, and record what happened. An honest self-report of an accidental breach is treated as what it is. An unreported breach that surfaces later is treated as concealment.

7 Practical situations

7.1 Sessions at a school

Sessions are run with the school's knowledge, in a space the school has agreed, with a school staff member aware that we are on site. We sign in and out. We do not take a learner out of a classroom or off the premises without the school's authorisation.

7.2 One-to-one conversations

Mentoring and individual guidance sometimes need privacy. Hold them in a room with a window or an open door, in sight of others, during normal hours, with another adult told beforehand. Record afterwards that it took place, with whom and roughly what was discussed.

7.3 Transport

No Four Nomads person transports a learner alone in a private vehicle. Where transport is part of an activity, it is arranged in advance with the written agreement of the parent or guardian, with at least two adults present, and a record of who travelled.

7.4 Home visits

Home visits are made in pairs, by arrangement, with the parent or guardian present.

7.5 Digital contact — WhatsApp, SMS and online

All contact with a learner happens on a **Four Nomads number or account**, never a personal one. Messaging a learner directly requires the consent recorded on the Learner Photograph, Media and Programme Consent Form. Group messages are preferred to individual ones. Messages are about programme matters, sent during reasonable hours, and are retained as a record. Never ask a learner to delete a message or to keep a conversation from their parent.

7.6 Overnight activities

Four Nomads does not currently run overnight activities. If that changes, this policy must be extended first — with written parental consent, a ratio and supervision plan, separate sleeping arrangements for adults and learners, and a named lead for each group — and the Board must approve it before the activity is advertised.

8 Images, stories and social media

- No photograph, video or recording of a learner is taken or used without the written consent of a parent or guardian, obtained on the Learner Photograph, Media and Programme Consent Form, and only for the purposes ticked on it.
- Images are captured on Four Nomads equipment and transferred to Four Nomads storage. They are not kept on personal phones.
- A learner's full name is not published together with their photograph and the name of their school.
- Learners are photographed in appropriate dress and in an activity that reflects the programme.
- If a learner says they do not want to be photographed, we do not photograph them, whatever the consent form says.
- Comments on our social media posts are monitored. Anything directed inappropriately at a learner is removed and reported.
- A learner, or an adult who was a learner, may ask for their image to be withdrawn at any time, and we act on it.

The full detail is in the POPIA Privacy Policy (FN-POPIA-01) and on the consent form itself. This section is the safeguarding half of the same rule: the privacy question is whether we have permission, the safeguarding question is whether publishing could expose this particular child to harm. Both have to be answered yes before an image is used.

9 Recognising that a child may be at risk

You are not expected to diagnose anything. You are expected to notice, and to pass it on.

FORM OF HARM	THINGS THAT MAY INDICATE IT
Physical abuse	Unexplained bruises, burns, fractures or marks; injuries in unusual places or in patterns; explanations that change or do not fit; flinching at sudden movement; covering up in warm weather; reluctance to go home.
Sexual abuse	Sexual knowledge, language or behaviour beyond the child's years; pain, bleeding or difficulty walking or sitting; pregnancy; a sudden fear of a particular person or place; self-harm; running away.
Emotional abuse	Extreme withdrawal or aggression; fear of making a mistake; severe lack of confidence; describing themselves in terms an adult has used; developmental delay without medical cause.
Neglect	Persistent hunger, dirt or inappropriate clothing; untreated medical conditions; frequent lateness or absence; being left without supervision; no one who knows where the child is.
Exploitation and trafficking	Unexplained money, phone or clothing; an older partner or "sponsor"; working long hours; being moved between places; a controlling adult who answers for the child.
Child in need of care and protection	Abandoned or orphaned with no visible means of support; living or working on the street; substance dependence without support; a household where the child is at risk — the circumstances in section 150 of the Children's Act.

Any one of these may have an innocent explanation. That is precisely why you report it rather than test it: establishing whether there is an explanation is the job of the people the law gives it to.

10 If a learner tells you something

A disclosure is the moment the whole policy exists for. Get this part right.

10.1 Do

- **Listen.** Let them say it in their own words, at their own pace.
- **Stay calm**, whatever you are feeling.
- **Tell them they were right to tell you**, and that it is not their fault.
- **Be honest about what happens next** — say that you have to tell one person whose job it is to help, and name them.
- **Write it down as soon as you can**, in the child's own words, with the date, time, place, who was present, and anything you observed. Sign and date your note.
- **Report it the same day** to the Designated Safeguarding Lead.

10.2 Do not

- **Do not promise to keep it secret.** Say instead: *"I can't keep this to myself, because I have to make sure you're safe. But I will tell you who I'm telling."*
- **Do not ask leading questions** or push for detail. "Can you tell me more about that?" is as far as you go. A badly conducted conversation can make a later prosecution impossible.
- **Do not investigate**, confront the alleged abuser, or warn anyone.
- **Do not photograph an injury** or examine a child.
- **Do not discuss it** with anyone other than the Designated Safeguarding Lead and the authorities.
- **Do not delay** because you are unsure whether it is serious enough. That is not your decision to make.

11 Reporting — the route out of Four Nomads

WHERE A CHILD IS IN IMMEDIATE DANGER

Call **10111** (South African Police Service) or **112** from a mobile. Then tell the Designated Safeguarding Lead. Do not wait for authorisation from anyone at Four Nomads before making that call.

11.1 Internal step

Every concern goes to the **Designated Safeguarding Lead — Ndivho Ramovha, ndivho@fournomads.org** (or info@fournomads.org) — on the day it arises, in writing, using the Safeguarding Concern Record. The Lead records it in the Safeguarding Register and decides within **24 hours** what external report is required.

11.2 Statutory step

IF THE CONCERN IS	THE REPORT GOES TO
A sexual offence against a child	**A police official — immediately. This is mandatory for every person, under section 54(1) of the Sexual Offences Act 32 of 2007, and failure to report is a criminal offence.**
Abuse causing physical injury, or deliberate neglect	A designated child protection organisation, the provincial Department of Social Development, or a police official — on the prescribed form, under section 110 of the Children's Act.
A child who appears to be in need of care and protection	The same three authorities, under section 110(2).
A concern about a person working for Four Nomads	Section 12 below.

11.3 If the Lead does not act

If you report a concern and nothing appears to happen, or the concern is about the Designated Safeguarding Lead, report it **directly to the Board of Directors**, and make the statutory report yourself. **Nobody at Four Nomads has the authority to tell you not to report to the police or to social development.** An instruction to that effect is itself a serious matter and must go to the Board.

Section 110(3) of the Children's Act protects a person who reports in good faith from civil liability arising out of the report. You do not have to be right. You have to be honest.

11.4 Useful numbers

POLICE EMERGENCY	10111 · 112 from a mobile
CHILDLINE SOUTH AFRICA	116 — free, 24 hours
GENDER-BASED VIOLENCE COMMAND CENTRE	0800 428 428
DEPARTMENT OF SOCIAL DEVELOPMENT	The provincial office for the district in which the learner lives

12 An allegation against someone who works for us

This is the situation an organisation is most tempted to handle quietly. We do not.

1. **The child's safety is secured first.** The person is removed from all contact with learners immediately, as a neutral precaution and not a finding of guilt.
2. **The statutory report is made** on the same basis as any other concern. We do not conduct our own investigation first, and we do not decide internally whether the allegation has merit before reporting it.
3. **The person is informed** of the fact of the allegation, in general terms, unless the police or social development direct otherwise because it would prejudice an investigation.
4. **The parent or guardian is informed**, unless doing so would place the child at greater risk, or the authorities direct otherwise.
5. **The Board is informed** within 24 hours, and records its knowledge of the matter in its minutes.
6. **No settlement, no silence.** Four Nomads will not enter into any agreement that prevents a person from reporting a safeguarding concern to the authorities, and will not accept a resignation as a way of closing a matter.
7. **If the allegation is upheld** or a finding is made, the person is removed permanently, and their details are reported for entry in the National Child Protection Register and, where applicable, the National Register for Sex Offenders.
8. **If it is not upheld**, the person is reinstated with support, and the record is kept.

13 Confidentiality and information

Safeguarding information is shared on a strict need-to-know basis: the Designated Safeguarding Lead, the authorities, and anyone the Lead must involve to protect the child. It is not discussed with colleagues, with the school beyond what is necessary, or with anyone else.

Records are kept separately from ordinary learner records, in access-controlled storage, and are retained for a long period because historical records matter in child protection — see the Records Management and Retention Policy (FN-RECORDS-01).

> **WHERE POPIA SITS IN THIS**
>
> The consent we hold from a parent governs the ordinary processing of a learner's information. It does **not** govern a safeguarding report. Processing personal information in order to report suspected abuse is permitted under POPIA — including as compliance with an obligation imposed by law under section 11(1)(c), and to protect a legitimate interest of the data subject under section 11(1)(d). **You do not need the parent's permission to report, and a withdrawal of consent does not stop a report.** Where the concern is about the parent, telling them may be exactly the wrong thing to do.

14 Training, awareness and review

- Everyone is briefed on this policy and signs it **before** their first contact with learners.
- A refresher is run annually, and after any change to this policy.
- The Designated Safeguarding Lead receives external safeguarding training and keeps the evidence of it.
- Learners are told, in language they understand, who they can speak to and how.
- Parents and guardians receive this policy on request, and are told that it exists on the consent form.
- Partner schools receive a copy when the partnership is agreed.

The Designated Safeguarding Lead reports to the Board at least annually on the concerns raised, how they were handled, and anything in this policy that did not work in practice. The Board reviews the policy every year, and immediately after any serious incident.

15 Who to contact

DESIGNATED SAFEGUARDING LEAD	Ndivho Ramovha · ndivho@fournomads.org · info@fournomads.org · mark the subject line "Safeguarding — urgent"
DEPUTY	To be designated by the Board. Until one is designated, concerns about the Lead go directly to the Board.
BOARD OF DIRECTORS	Ndivho Ramovha · Risuna Harriot Maluleke · Darrel Landsberg · Kalizya Silungwe
POSTAL / STREET	51 Boabab Street, Newtown, Louis Trichardt, 0920

ACKNOWLEDGEMENT

I have read the Four Nomads NPC Child Safeguarding and Protection Policy. I understand what is expected of me, what is prohibited, and what I must do if I have a concern about a child. I agree to be bound by it.

FULL NAME _____ SIGNATURE _____ DATE _____

16 Document control and approval

VERSION	DATE	AUTHOR	CHANGE
1.0	October 2026	Information Officer	First issue.

OWNER	Designated Safeguarding Lead, Four Nomads NPC
APPROVED BY	The Board of Directors of Four Nomads NPC
BOARD RESOLUTION DATE	12 September 2026
NEXT REVIEW	October 2027
APPLIES TO	All directors, employees, volunteers, mentors, facilitators, interns and contracted service providers of Four Nomads NPC
RELATED DOCUMENTS	FN-POPIA-01 POPIA Privacy Policy · FN-PAIA-01 PAIA Manual · FN-NOTICE-01 Privacy Notification · FN-CONSENT-01 Learner Consent Form · FN-BREACH-01 Data Breach and Security Compromise Policy

DESIGNATED SAFEGUARDING LEAD	FOR THE BOARD OF DIRECTORS	DATE
Ndivho Ramovha	Name and capacity	12 October 2026

Four Nomads NPC · Registration No. 2022/514801/08 · PBO No. 930086019 · Section 18A approved
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This document states the position as at the date of issue. It is an internal governance and compliance document prepared for Four Nomads NPC and is not legal advice to any other person. Where it conflicts with legislation, the legislation governs.