

NELSON MANDELA

UNIVERSITY



Transformation Office

Safeguarding Policy Relating to Modern Slavery, Human Trafficking and
Child Exploitation



Creating a Safe, Inclusive and Protective University Environment

30 June 2026

Training Objectives



Understand
safeguarding and why
it matters



Know who the policy
protects



Understand
institutional
responsibilities



Recognise signs of
abuse and
exploitation



Know how to respond
appropriately



Understand reporting
procedures

Why Safeguarding?

Universities are a place of:

- Learning
- Research
- Innovation
- Community Engagement
- Student development

Responsibility to ensure safety from:

- Abuse
- Exploitation
- Neglect
- Harassment
- Modern slavery
- Human trafficking

Why This Policy

- The University commits to:
 - ✓ Protecting children
 - ✓ Protecting vulnerable adults
 - ✓ Protecting students
 - ✓ Protecting employees
 - ✓ Protecting visitors
 - ✓ Protecting communities engaged through university activities

Legal Framework

The policy is informed by:

- Constitution of SA
- Bill of Rights
- Prevention and Combating of Trafficking in Persons Act
- POPIA
- Children's Act
- Labour Legislation
- International Human Rights instruments
- King IV Corporate Governance Principles

What is Safeguarding?

Safeguarding means:

The measures the University takes to protect people from abuse, neglect, exploitation and harm while promoting their wellbeing.

It is everyone's responsibility.

Who Do We Protect?



Children

Any person under 18. This represents an absolute policy boundary requiring mandatory vetting checks and specific co-curricular protection.



Vulnerable Adults

Individuals over 18 experiencing or at risk of harm or exploitation who cannot protect themselves due to specific support or care needs.



Modern Slavery Targets

Anyone subjected to modern slavery forms such as forced labor, human trafficking, descent-based servitude, or bonded labour.

Who Must Comply?

This policy applies to:

- Permanent employees
- Contract employees
- Students
- Interns
- Volunteers
- Consultants
- Contractors
- Researchers
- Service Providers
- Council Members
- Visitors

University Commitments

- Zero tolerance for abuse
- Respect for human dignity
- Human rights protection
- Safe reporting
- Confidentiality
- Fair investigations
- Accountability
- Prevention before harm occurs

Guiding Principles

- Respect
- Human dignity
- Equality
- Non-discrimination
- Accountability
- Ethical leadership
- Prevention
- Protection
- Justice

Forms of Abuse/ Harm



Physical & Emotional Abuse: Acts deliberately causing physical damage, or persistent degradation, shouting, and verbal criticism that limits normal emotional development.



Neglect & Omission: Failing repeatedly to meet an individual's basic physical, medical, educational, psychological, or nutritional needs while under university care.



Online Abuse & Exploitation: Cyberbullying, digital grooming, data breaches, and illegal virtual tracking occurring through university infrastructure or personal devices.



Sexual Abuse & Harassment: Coercing or enticing individuals into sexual contact, inappropriate exchanges, or exploitation. *(Note: Mistaken belief of age is not a defense).*

Modern Slavery

Modern slavery includes:

- Human trafficking
- Forced labour
- Debt bondage
- Child labour
- Sexual exploitation
- Forced marriage
- Descent-based slavery

Indicators of Modern Slavery



Individual is controlled by others; reluctant to interact.



Personal identification documents are missing/confiscated.



Few personal belongings; wears unsuitable clothes.

Human Trafficking

Human Trafficking involves:

Recruitment, Transport, Transfer, Harbours, Receipt of persons through:

- Force
- Coercion
- Fraud
- Abuse of vulnerability for exploitation.

Recognising Abuse

Possible indicators include:

- Fearfulness
- Withdrawal
- Anxiety
- Unexplained injuries
- Poor hygiene
- Sudden behavioural changes
- Signs of neglect
- Financial control
- Isolation

Safeguarding in University Activities

Examples include:

- Teaching
- Research
- Community engagement
- Schools outreach
- Sports
- Residences
- Fieldwork
- International programmes
- Conferences
- Work Integrated Learning
- Volunteer programmes

Roles and Responsibilities

Everyone

- Know the policy
- Recognise concerns
- Report concerns
- Protect confidentiality
- Attend training
- Promote respectful behaviour
- Support investigations

Leadership Responsibilities

- Identify high-risk activities
- Allocate resources
- Conduct risk assessments
- Appoint Local Safeguarding Officers
- Support training
- Ensure compliance

Local Safeguarding Officers

- Providing advice
- Receiving reports
- Supporting staff
- Promoting awareness
- Maintaining records
- Coordinating referrals

Code of Conduct

Representatives must:

- Treat everyone respectfully
- Maintain professional boundaries
- Protect confidentiality
- Never exploit vulnerable people
- Never engage in inappropriate relationships
- Never ignore safeguarding concerns

Operational Reporting Pathway

1. Observe & Log

Note clear behavioral, physical, or verbal indicators immediately.
Maintain strict confidentiality.

2. Notify LSO

Report the observations to your local Safeguarding Officer (LSO) within 24 hours.

3. Core Referral

LSO routes to Dean of Students (Student cases), ER/Transformation (Staff), or Legal (Third-party).

4. Safe Vetting

HR conducts vetting (criminal check, Sex Offenders Register) on potential hires continuously.



Confidentiality

Safeguarding reports must:

- Remain confidential
- Protect the dignity of everyone involved
- Be shared only on a need-to-know basis
- Comply with POPIA

False Allegations

The University:

- Investigates every report fairly
- Protects good-faith reporters
- Will address malicious allegations appropriately
- Ensures procedural fairness

High Risk Areas

Examples include:

- Residences
- Sports
- Health Sciences
- Education
- Financial Aid
- Research involving children
- Community engagement
- International programmes
- Cleaning and catering
- Security
- Marketing

Building a Safeguarding Culture

A safeguarding culture means:

- Everyone is responsible
- People speak up
- Concerns are taken seriously
- Victims are supported
- Leaders model ethical behaviour
- Safety comes before reputation

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