hyperSHIFT Safeguarding Policy

Applies to: hyperSHIFT (Pty) Ltd and subsidiaries: hyperLOOP, MINDSHIFTERS, Mindshifters Ministries, Mindshifters Academy
Effective date: 29 September 2025 • Review cycle: annually • Policy owner: Group Safeguarding Lead

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1) Purpose

To protect children and vulnerable adults who interact with our people, programmes, and platforms; to prevent abuse and exploitation; and to set clear responsibilities, behaviours, and procedures for responding to concerns.

2) Scope

This policy applies to all employees, contractors, volunteers, interns, board members, ambassadors, and partners acting on behalf of hyperSHIFT or any subsidiary—on-site, off-site, and online.

3) Definitions

- **Child:** Any person under 18 years.

- **Vulnerable adult:** An adult who, by reason of disability, age, illness, dependence, or circumstance, may be unable to protect themselves from harm or exploitation.

- **Safeguarding:** Preventing harm; protecting people's health, wellbeing and human rights; enabling safe participation in our activities.

- **Abuse:** Physical, emotional/psychological, sexual, neglect, financial, spiritual/religious abuse, bullying/harassment, online exploitation.

4) Guiding Principles

- **Dignity & respect** for every person.

- **Do no harm**: prevention is paramount.

- **Best interests of the child** take precedence.

- **Zero tolerance** for abuse, exploitation, and retaliation.

- **Confidentiality & data minimisation** under POPIA.

- **Accountability & transparency** in decisions and reporting.

5) Legal & Regulatory Alignment (South Africa)

- Children's Act 38 of 2005 (incl. s110 mandatory reporting by designated professionals).

- Criminal Law (Sexual Offences and Related Matters) Amendment Act—National Register for Sex Offenders.

- Domestic Violence Act 116 of 1998; Protection from Harassment Act 17 of 2011.

- Protection of Personal Information Act (POPIA).

- Employment relations: LRA, BCEA, Codes of Good Practice.

Note: Where this policy conflicts with law, the stricter provision applies.

6) Roles & Responsibilities

- **Board:** Approves policy, receives annual safeguarding report.

- **Group Safeguarding Lead (GSL):** Implements policy, oversees risk, training, and case management; maintains incident log.

- **Deputy Safeguarding Lead(s) (DSL):** Brand-level focal points (MINDSHIFTERS, Ministries, Academy).

- **Managers:** Ensure team compliance; escalate concerns immediately.

- **All personnel:** Follow Code of Conduct; report concerns without delay.

- **Partners/Vendors:** Contractually required to meet equivalent standards.

7) Code of Conduct (Selected Requirements)

You must:

- Treat all people with kindness, patience, and respect; use inclusive, non-derogatory language.

- Maintain appropriate **boundaries** (physical, emotional, digital).

- Obtain **informed consent** for participation, photos/filming, and data processing.

- Meet **two-adult** rule for child interactions (avoid 1:1 private settings; if unavoidable, keep doors open/visible and record the session).

- Use **organisation accounts** for digital comms; keep professional tone and hours.

- Report concerns, suspicions, or incidents **immediately**.

You must not:

- Hit, shame, belittle, threaten, or spiritually coerce anyone.

- Initiate or tolerate sexualised behaviour, conversation, "jokes," or relationships with beneficiaries (including grooming).

- Give alcohol, drugs, or inappropriate gifts; accept expensive gifts.

- Transport a child alone in a vehicle without prior written guardian consent and manager approval (and never without another adult if avoidable).

- Photograph/film children without consent (guardian + child assent) or share identifying media on personal channels.

- Communicate privately with minors on personal accounts or outside agreed platforms.

8) Safer Recruitment & Screening

- Role-specific safeguarding risk assessment.

- Written application, structured interview, **two references** (incl. last employer).

- **Criminal record checks**; checks against the National Register for Sex Offenders (where permissible) and, where relevant, the Child Protection Register (Part B).

- Signed **Code of Conduct & Confidentiality** before start.

- Probation with enhanced supervision for child-facing roles.

9) Training & Awareness

- **Induction**: safeguarding essentials + POPIA.

- **Annual refreshers** for all; **role-specific** modules for counsellors, facilitators, videographers, mentors, and event staff.

- Visible reporting channels on websites, event briefs, and participant handouts.

10) Risk Management

- Activity-level **safeguarding risk assessments** (template provided).

- Appropriate supervision ratios for events with minors (guideline: 1:8 for ages 12–17; 1:6 for 6–11; more supervision for younger/complex needs; ensure gender-appropriate mix of adults).

- Venue checks (privacy, visibility lines, first-aid, accessibility).

- Transport, overnight stays, and home visits require written protocol and approvals.

11) Online Safety & Media

- Use moderated platforms; disable DMs where possible for minors.

- Content review for **Voices of Hope/Light in the Marketplace** stories: obtain written consent, avoid retraumatisation, anonymise sensitive details, and never disclose precise locations of vulnerable individuals.

- Image/footage storage in approved systems; time-bound retention.

12) Working with Counselling & Ministry Contexts

- Clear **informed consent** for counselling/mediation with scope, limits of confidentiality, data use, emergency contacts.

- Lone-working procedures for counsellors (calendar entries, check-in/out, panic protocols).

- Mandatory risk escalation for self-harm, harm to others, or abuse disclosures.

13) Gifts, Financial Assistance & Conflicts

- Any personal financial assistance to beneficiaries requires manager approval and documentation; avoid creating dependency or power imbalances.

- Declare and manage conflicts of interest.

14) Reporting Concerns (Anyone Can Report)

Report immediately if you:

- Witness abuse or poor practice,

- Receive a disclosure, or

- Suspect someone may be at risk.

Channels:

- **Safeguarding inbox:** info@hypershift.co.za

- **Phone: +27-65-075-3789**

- **Emergency:** If there is immediate danger, contact **SAPS 10111** or emergency medical services.

Acknowledgement: within **24 hours** (faster for high-risk). No retaliation against good-faith reporters.

15) Case Management & External Escalation

- GSL logs the incident, conducts **initial risk triage** and protective actions (e.g., separate parties, suspend staff from duties pending inquiry).

- Where required by law or risk level, **notify authorities** (DSD/SAPS) without delay.

- Inform parents/guardians unless doing so increases risk.

- Coordinate with HR for disciplinary processes.

- Maintain secure records (need-to-know, access-controlled).

16) Data Protection (POPIA)

- Process only necessary personal information; use lawful bases (consent, legitimate interests, legal obligation).

- Store securely; restrict access; define **retention** (default 5 years for incident logs unless legal hold).

- Provide data subject rights channels; report any data breaches per POPIA timelines.

17) Partnerships, Contractors & Venues

- Contracts include safeguarding clauses, duty to report, screening expectations, and right to audit.

- Shared protocols for co-hosted events; single lead for incident response.

18) Monitoring & Review

- Quarterly safeguarding dashboard to ExCo; annual report to Board.

- Post-incident reviews and continuous improvement actions.

- Policy review at least **annually** or after significant incidents/legislative change.

19) Non-Compliance

Breaches of this policy may result in disciplinary action up to and including termination of engagement and reporting to authorities/regulators.