

BSN Safeguarding and Child Protection Policy

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1. BSN Policy Statement

The British School in the Netherlands (BSN) recognises the moral and statutory responsibility to act in the best interests of the child at all times. It aims to enable all children to have the best outcomes through the provision of a safe and welcoming environment where all children are respected, valued and safe.

Systems, training and safe practice are developed through adherence to the Dutch Protocols for violence both domestic and serious and also for child abuse (Meldcode). They are also developed by being benchmarked against best safeguarding practices in the UK.

The procedures described in this policy apply to all staff, parents, volunteers, visitors, governors and children, both on and off the school premises, whilst they are the responsibility of the BSN.

2. BSN Core Safeguarding Principles

- It is the responsibility of everyone at the BSN to safeguard and promote the welfare and human rights of all children.
- All children regardless of age, gender, ability, culture, race, language, religion or other protected characteristics* (see below), have equal rights to protection.
- The best interests of the child are always considered as paramount.
- All BSN staff understand safe professional practice and adhere to our safeguarding policy and procedures.
- Children and staff involved in safeguarding issues will receive appropriate support.

**Protected characteristics as defined in the UK Equality Act 2010:
age, disability, race, religion or belief, sex, sexual orientation or gender
reassignment marriage / civil partnership, pregnancy and maternity.*

3. With Regards to Safeguarding at the BSN, we will aim to:

- Support every child's development in ways that will foster security, confidence and independence.
- Provide an environment in which all students feel safe, secure, valued and respected whilst feeling confident and able to approach adults if they are in difficulty.
- Raise the awareness of all staff of the need to safeguard all students and of their responsibilities in identifying and reporting possible cases of abuse or neglect.
- Provide a systematic means to monitor students who are at risk of harm or are in need.
- Develop effective working relationships and appropriate information sharing with other agencies, including the Raad voor Kinderbescherming, Ministrie van Justitie en Veiligheid, medical professionals; the Police and other related subsidiaries such as Veilig Thuis (VT) or the Centrum Jeugd & Gezin (CJG)
- Emphasise the need for communication between all members of staff in cases of suspected abuse or neglect.
- Review all cases to learn lessons, make improvements and inform our future practice.
- Ensure that all adults, including external contractors and visitors at the BSN, who may have independent access to children, have current security checks such as Verklaring Omtrent het Gedrag (VOG) and other checks in line with BSN's Safer Recruitment procedures.

4. Safeguarding Terminology

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes and are able to thrive.

Child Protection refers to the processes undertaken to protect children who have been specifically identified as suffering, or being at risk of suffering significant harm.

Safeguarding are the actions taken to pro-actively promote everyone's welfare, safety and effective care and also protect all stakeholders from harm. **(NSPCC Learning 2022)**

Staff refers to all those in paid employment working for or on behalf of the BSN, full time or part time.

Volunteer refers to all those working for or on behalf of the BSN without payment; whether once or in a more regulated way (see below).

Regulated volunteers are defined as any persons who, as a result of their volunteering role will regularly be responsible for the instructing, caring for or supervision of children. Regular being defined as being 6 or more times within an academic year or 3 times within a 30 day period.

Children* refers to all students who are in full time education at the BSN. Though it should be noted that certain policy judgments have to be made with the knowledge that certain legal thresholds are crossed when students become 16 and again 18 years old.

**The following are the official age group definitions within the Netherlands:*

'Children' - anybody under 12 years (including unborn babies).

'Young people' - Those people aged between 12 and 18 years

'Young adults' - Are those aged between 18 and 25 years

Parent refers to birth parents and other adults who are in a parenting or guardianship role.

Constrained refers to the loyalty conflict that may arise if parents, siblings or other members of the family or acquaintances such as friends or neighbours, abuse a child.

Meldcode is the five-step reporting code for violence and child or domestic abuse in the Netherlands.

5. Roles and Responsibilities

ALL adults at the BSN will:

- Have responsibility for safeguarding students and ensuring the provision of a safe environment in which children can grow, learn and thrive.
- Know what to do if a child makes a disclosure that they are being abused, neglected or experiencing some other form of inappropriate treatment.
- Maintain an appropriate level of confidentiality whilst liaising with the relevant professionals.
- Be aware of the signs and indicators of possible abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), radicalisation, domestic abuse, child on child abuse or threat of violence (serious or otherwise).
- Maintain an attitude of 'it **could** happen here' and always act in the best interests of the child
- Speak to the relevant Designated Safeguarding Lead (DSL) if they have any questions; are unsure about school policy or procedure or have any concerns about anyone's safety.
- Be personally responsible for ensuring they understand the BSN safeguarding procedures and policy.
- Be aware that it is **NOT** the responsibility of all adults at the BSN to investigate suspected abuse – no staff member should take action beyond that agreed by the Trustees, CEO and DSLs.
- Be aware that it **IS** the responsibility of all adults at the BSN to report all suspected abuse or threats to a child's well-being.

The Board of Governors at the BSN will:

- Designate a member of the Board of Governors (BoG) to act as a Designated Governor for safeguarding (DG for s/g) for the BSN.
- Hold the CEO/Executive Team to account for their safeguarding roles and responsibilities.
- Have a strategic overview of key patterns and trends with regards to safeguarding.
- Liaise with the Board of Management (BoM) on matters of strategic safeguarding policy and process and ensure safeguarding is a regular agenda item at BoM meetings.

Chief Executive Officer (CEO) at the BSN will:

- Hold Headteachers, including the designated Board of Management member to account for their roles and responsibilities.
- Ensure written procedures are in place for dealing with allegations against a member of staff.
- Ensure that written safeguarding and child protection policy and procedures are in place.

- Ensure written 'Safer Recruitment' policies and procedures are in place.
- Ensure the regular, timely and robust external auditing of safeguarding systems and processes.
- Ensure that robust and appropriate training is in place for all adults.
- Prioritise the maintenance of a culture where leaders can be challenged over any safeguarding concerns.
- Report necessary details to the appropriate authorities at the termination of a contract due to safeguarding concerns.
- Appoint a case committee that is responsible for making reporting decisions in line with the disciplinary procedures and the critical incident policy (CIP).

A designated member of the Board of Management for Safeguarding at the BSN will:

- The designated member of the BoM (DBM for s/g) will chair the BSN safeguarding team.
- Hold regular safeguarding team meetings to ensure consistency and support across the BSN
- Evaluate the effectiveness of the DSL team, in liaison with the Headteachers across the BSN and when needed the and CEO.
- Ensure that robust and appropriate training is in place for all adults and is appropriate for their role within the organisation.
- Act as a key liaison between the (DG for s/g) and the BoM in all matters regarding safeguarding.
- Report on current trends and patterns for safeguarding and child protection within the BSN and champion appropriate strategic action with consideration to evidence-based research and international best practice
- Will lead the safeguarding team in the reviewing and updating of BSN safeguarding policies and procedures, in line with best practice, on at least an annual basis.
- Ensure the DSL team undertakes formal training at least every two years and refreshes knowledge and skills regularly.
- Ensure that appropriate members of BSN staff undertake formal 'Safer Recruitment' and refresh their knowledge and skills regularly.

Chief HR Officer at the BSN will:

- Adhere to and champion the best practice for safer recruitment throughout every level of the organisation.
- Designate and hold to account the DSL who represents the Central Services on the cross- school safeguarding team. In the circumstances that the CHRO is the DSL then the (DBM for s/g) will hold the CHRO account in terms of safeguarding.
- Be designated to lead the BSN safeguarding team specifically in the annual reviewing and updating (in line with best practice) of the BSN safer recruitment policy and procedures.
- Ensure that on-boarding services issue appropriate TES EduCare training and face to face safeguarding inductions - including up to date training of all new staff in 'Internet / Online Safety'.

- Ensure that Single Central Register requirements for all paid staff are consistently met across the organisation.
- Ensure that Single Central Register requirements for all contractors, external to then BSN, are consistently met across the organisation.
- Ensure that robust background and police checks (including attaining at least two references – preferably where possible three) are carried out and recorded in line with Dutch law and international best practice, for all new staff.

Headteachers/Board of Management at the BSN will:

- Have overall responsibility for all safeguarding matters on their campus, as designated by the CEO/Executive Board.
- Agree and ratify the Safeguarding and Child Protection policy and any updates after review.
- Agree and ratify the process of managing allegations against a member of staff, and any updates after review.
- Agree and ratify the Safer Recruitment Policy, and any updates after review.
- Hold the DSLs on their sites to account for their roles and responsibilities.
- Ensure the Safeguarding and Child Protection policy, and all associated policies including Safer Recruitment, are consistently implemented on their campus.
- Signpost the availability and publication of relevant safeguarding policies and procedures to their wider school community via the Policies section on the BSN Compass.

Designated Safeguarding Leads at the BSN will:

- Ensure that the Single Central Register requirements for 'regulated volunteers, interns and Co-Curricular Activity providers are consistently met on their campus.
- Ensure that a system for the robust transfer of safeguarding information for students joining or leaving the BSN or those transferring campuses is in place and consistently practised.
- Manage referrals and cases, provide training, and raise awareness as outlined below:
 - Keep detailed, accurate and secure records of disclosures, concerns, referrals, discussions and decisions made (with reasoning) within CPOMS.
 - Provide a systematic means for monitoring children considered to be at risk.
 - Emphasise the need for good communication between all adults at the BSN.
 - Have a good working knowledge of local context - seeking advice from and reporting cases to relevant external agencies.
 - Proactively develop effective links with external agencies to help promote all round understanding and strengthen these relationships.
 - Maintain up to date knowledge of the Dutch Meldcode and act in accordance.
 - Ensure understanding of how GDPR impacts safeguarding and vice-versa.
 - Giving support, advice and expertise to staff on safeguarding matters.

- Support staff involved in disclosures, cases and/or referrals
- Liaise with the Headteacher all suspicions of children at risk
- Liaise with the (DBM for s/g) on all referrals/contacts with external agencies
- Meet regularly with the safeguarding team to share information, analyse BSN trends and support each other with safeguarding / child protection issues.

Provide training as follows:

- Be proactive in maintaining an up-to-date knowledge of best practice for international safeguarding and child protection developments, and share any knowledge / resources with the Safeguarding team.
- Regular training and updates to all staff and volunteers in relevant areas of safeguarding, including but not limited to online / internet safety, GDPR, recent updates on radicalisation and the protocols when reporting a disclosure of safeguarding concern.
- Provide all new staff with an appropriate safeguarding induction. This must cover the BSN's policy and procedures and what to do if:
 - an adult has a concern about a child
 - an adult has concerns about another staff member/volunteer/intern or CCA provider.
 - a child is in danger or risk of harm or is being prevented from thriving.

Raise awareness by:

- Encouraging a culture of listening to students and becoming a 'telling school'. This includes the ensuring that all disclosures are taken seriously.
- As the BSN safeguarding team annually reviewing the safeguarding and child protection policy and other associated policies and promoting them with the wider staff.
- Working in partnership with other key staff to promote children's personal, social, physical, and mental health, so fostering student security, confidence and independence.
- Being alert to and raising awareness, where appropriate, to any child or young person's specifically protected characteristics.
- Liaising with key colleagues for the robust transfer of information regarding any safeguarding information if a student leaves the BSN or transfers campus.
- Collating and following up, when appropriate, any existing information on safeguarding concerns from a previous school and/or campus.

In response to the ongoing observation of a child in need, the DSL will:

- Liaise with relevant staff and set up a case conference to decide appropriate action.
- Meet with parents to discuss the child's wellbeing and support.
- With parental consent - arrange in-school support (academic emotional or

health related)

- Contact external agencies for guidance.
- Monitor impact of support and if necessary refer case to child protection or Veilig Thuis.
- Where appropriate, seek guidance or discuss cases with the Headteacher or other members of the BSN Safeguarding Committee.

6. Safeguarding Practice Guidelines

To safeguard and promote the welfare of all children, the following practice guidelines are implemented across the BSN. These guidelines apply to **all** staff:

- All children are treated with respect.
- Staff behave with professionalism at all times and conduct themselves professionally in terms of appropriate standards of conversation and interaction with children.
- Positive and safe physical, emotional and online behaviour, is explicitly taught promoted and monitored.
- The school environment and culture enables all children to feel safe, valued and listened to.
- Staff are alert to changes in a child's behaviour and physical or mental wellbeing, and recognise that changes in these can be an indicator of safeguarding concern.
- Staff understand that safeguarding issues can be manifested via 'child on child' abuse.
- Staff read and consistently implement the BSN Safeguarding policy and school procedures for wider safeguarding issues such as behaviour, anti-bullying, information sharing and dealing with incidents of violence or online safety.
- Staff have an understanding and awareness of the different personal, family or cultural circumstances and lifestyles of all the children in their care and how these can impact on their health, development and wellbeing.
- All staff should have an awareness of safeguarding issues that can put children at risk of harm.
- Such issues (often considered as sign-posts of children being at risk), may include behaviours
 - linked to or alcohol or substance misuse; deliberately missing education, radicalisation and
 - consensual or non-consensual sharing of nude and semi-nude images and/or videos.

Below are other safeguarding issues that all staff should be aware and regularly reminded of:

- Child on child abuse (see Appendix 5)
- Child Sexual Exploitation (CSE) (see Appendix 8)
- Child Criminal Exploitation (CCE) - (see section 10 below 'Children at Risk')
- Domestic abuse - (see section 8 below 'Types of Abuse')
- Female Genital Mutilation (FGM) (see Appendix 9)
- Maintaining positive mental health (see Appendix 10)

- Serious violence, even as a spectator

7. Establishing a Culture of Safety and Trust

The BSN recognises that curriculum has an important role to play in the protection of children. Using regular and effective Personal, Social, Health and Economic (PSHE) and Life Skills lessons; and also through specific units of work in a range of subjects, assemblies and class or form-tutor time, the following areas are addressed:

- a. Student self-esteem, mental health and wellbeing
- b. Aspects of risk and managing risk
- c. Self-protection strategies
- d. Developing knowledge of boundaries between appropriate and inappropriate behaviours
- e. Health care, hygiene and diet
- f. Non-abusive behaviour between students
- g. Confidentiality and privacy awareness
- h. Opportunities for children to make anonymous or confidential reports of issues causing them concern
- i. Online and internet safety
- j. Sex and Relationships Education (SRE)
- k. Dutch law including legal ages of consent; alcohol consumption and drug use
- l. Values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs

8. Types of Abuse

Any form of interaction that is violent or threatening towards a minor, whether physical, psychological or sexual in nature, which may be actively or passively imposed upon the minor by a parent or other person with whom the minor has a dependent or constraining relationship, and which causes or is liable to cause serious physical or psychological harm to the minor. **Wet op de Jeugdzorg, 2005 (NL Youth Care Act).**

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an

adult or adults or by another child or children. **Keeping Children Safe in Education (UK Department for Education, 2022) (KCSiE 2022)**

All staff have a professional duty to act on suspicions of abuse, or report allegations of abuse and should understand that they are rarely standalone events. Abuse may take any number of forms. These include physical, emotional, sexual or domestic abuse, as well as neglect. The concept of significant harm is the threshold that justifies intervention in the best interests of the child. There are no absolute criteria for what can constitute significant harm. Relevant factors include the severity of treatment, the degree of harm, or the duration or frequency of abuse or neglect. It may be that a singular event constitutes significant harm, or it may be that a compilation of events that constitute significant harm and as a result, damage the physical or psychological development of a child. If a child is considered to be at risk of extra-familial harms or exploitation, it should be remembered that children can be vulnerable to multiple different types of these harms. **(KCSiE 2022)**

Common indicators of abuse:

Physical abuse: a form of violence or abuse (often can be serious violence but not always) may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces, illness in a child. **(KCSiE 2022)**

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. 'Silent abuse' also falls within emotional abuse and involves a child being deliberately ignored and not communicated with for significant periods of time. Emotional abuse may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. **(KCSiE 2022)**

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence - whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to

behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. **(KCSiE 2022)**

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from the home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (which may include the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs **(KCSiE 2022)**

Domestic Abuse: can encompass a wide range of behaviours. It may be a single incident or a pattern of incidents. Such abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional/psychological in nature. Child victims of domestic abuse may see, hear, or experience the effects of abuse at home and/or in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and have a long-term impact on a child's health, well-being, development, and ability to learn. **(KCSiE 2022).**

The 2021 UK Domestic Abuse Act states that it is Domestic abuse if the perpetrator and the person the actions are directed at are 'Personally connected'. The term 'domestic violence' is used when there is a close relationship between the offender and the victim – when the violence committed by someone in the victim's domestic circle. This includes partners and ex-partners, immediate family members, other relatives and family friends. There is usually a power gap between the victim and the perpetrator, with the victim often being dependent on the offender. **NL Government, 2013**

For details relating to Child on Child Peer on Peer abuse (including sexting) (see Appendix 5)

9. Recognising Possible Signs of Abuse

Staff and other adults at the BSN are well placed to observe any physical, emotional or behavioural signs which indicate that a child is suffering or likely to suffer harm, or is in immediate danger. A respectful relationship between staff, children and families that fosters confidence and trust can lead to the disclosure of abuse and staff being alerted to concerns.

The following list of the possible signs of abuse, is not prescriptive and many of the signs listed will not necessarily indicate abuse but equally more than one be present in case

of abuse:

- Unexplained injuries
- Comments or language from the child that are out of character or inappropriate
- Deterioration in general well-being
- Inability to trust others and make friends
- Truancy, lying or stealing
- Avoiding the removal / changing of clothes when preparing for PE
- Under-achieving, unable to concentrate
- Bullying other children or being bullied
- Aggression or abuse towards others
- Overly cautious around adults
- Untreated medical conditions
- Issues of consistent personal hygiene
- Obvious hunger or malnutrition
- Significant alterations in behaviour
- Unauthorised absences from school that do not have reasonable explanation or exhibit a suspicious pattern (see below)

Issues with attendance at school

Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse or exploitation. The DSL will monitor unauthorised absence and take appropriate action including notifying Veilig Thuis or Leerplicht, particularly when children go missing on repeated occasions and/or are missing for periods during the school day.

10. Recognising Children in Need or at Risk

A child in need is defined as a child who is unlikely to achieve or maintain a reasonable standard of health or development without the provision of services or support from an external agency. **Children's Act, UK Government, 1989**

They are considered to be in need if their health or development is likely to be significantly impaired, or further impaired, without the provision of these services or support, or the child is disabled. **Working Together to Safeguard children, HM Government UK , 2018**

At the BSN, we highlight any observed or perceived welfare concerns to the DSLs. These welfare concerns may include, but are not limited to, severe academic pressure; concerns regarding eating issues; problematic domestic living arrangements and mental health issues.

All staff are expected to identify when a child may benefit from early help. Analysing a student's situation using early health type assessments means providing

support (including in-school). This can be given as soon as a problem emerges, at any point in a child's life, and will help them be better prepared and to build resilience.

In response to the ongoing observation of a child in need, the DSL is likely to:

- Liaise with relevant staff and set up a case conference to decide appropriate action
- Meet with parents to discuss the child's wellbeing and support
- With parental consent - arrange in-school support (academic emotional or health related)
- Contact external agencies for guidance
- Monitor impact of support and if needed, refer the case to Veilig Thuis
- Where appropriate, seek guidance or discuss cases with the Headteacher or other members of the BSN Safeguarding Committee.

There will be a differentiated approach between action taken for those children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies.

Any child may benefit from early help, but all staff should be particularly alert to the potential needs of a child who is:

- disabled and / or has specific additional learning needs
- a young carer
- frequently missing or goes missing from care or home
- misusing drugs, substances or alcohol
- in a family circumstance presenting challenges for the child. Such circumstances can include an adult with substance abuse; an adult with mental health problems or domestic abuse (see section 8)
- living away from home or in temporary accommodation with a transient lifestyle
- vulnerable to being bullied, or engaging in bullying
- living in chaotic and / or unsupportive home situations (including silent abuse)
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, sexuality or other protected characteristics.
- does not have English as a first language.

Staff should also be alert to a child who is at risk of:

Serious violence

All staff should be aware of indicators, which may signal a child is at risk from, or are involved with, serious violent crime and / or from criminal organisations. These may include increased absence from school; changes in friendships or relationships with older individuals or groups; a significant decline in performance; signs of self-harm, assault or unexplained injuries or a significant change in wellbeing.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of child criminal exploitation (CCE).

11. Managing and Responding to Concerns

On hearing an allegation of abuse or neglect from a child or third party

All staff should:

- Listen carefully and show no surprise or shock
- Avoid asking leading questions
- Reassure the individual that the allegation/complaint will be taken seriously
- Not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that correct action is taken.

All concerns, discussions and decisions (together with reasoning) made under these procedures should be recorded using the BSN's confidential online Safeguarding system (CPOMS). This record should explicitly state the accurate date and time of the incident or report (not the automated date and time the CPOMS incident write-up is completed). It should also include details of the place of the conversation/disclosure and include any details of what was said, allegations of what was done and by whom and in whose presence. It should also list specific references to any other staff or students involved.

Disclosures and concerns should be communicated to the DSL immediately or as soon as possible after the event. This is done by alerting the DSLs within the incident log of the CPOMS program. However in circumstance when the disclosure or incident is felt to need immediate action the DSL should also be spoken to face to face. In their absence of all DSLs from the particular BSN site, the Headteacher or Senior Leader in charge of the school should be informed.

On receiving a report of concerns about a child, the DSL should:

- Follow up the disclosure or concern with the staff member and where possible and if appropriate, speak to the child involved.
- Assess the information and act in accordance with the Dutch Meldcode (see Step Diagram and decisions - see Appendix 3).
- Depending on the disclosure and assessment of risk and nature of alleged abuse, inform Headteacher; gather advice from Veilig Thuis; arrange an urgent meeting with parents (if appropriate and not causing further danger to the child); and if required, officially report the incident to Veilig Thuis or contact the police.

Once a report is officially made to Veilig Thuis, the responsibility for initiating further help lies with them. This is help for the family by agreement and may be through Bureau Jeugdzorg (Youth Support) or other agencies, some of which are listed in Appendix 1. Continued alertness is still necessary, by staff and the DSL, to ensure that the child is not at increasing risk, or that the child's circumstances are improving.

Advice may also be sought from the School Doctor at the Jeugd Gezondheidszorg (Youth Health Service).

12. Safer Recruitment

Refer to the BSN Recruitment and Selection Policy Incorporating Safer Recruitment

At the BSN, we work to ensure that:

- The best possible staff are recruited on the basis of their merits, abilities and suitability for a position.
 - A fair, equitable and effective recruitment procedure is established.
 - The recruitment process is consistent with local employment legislation, refers to best practice guidance published by the UK Department for Education - Keeping Children Safe in Education (**KCSIE Sept 2022**) and with the BSN policies and practices.
 - The reputation of the BSN, both as an employer and a quality provider of education is enhanced and maintained.
 - The BSN meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks, and does not knowingly employ people to work in childcare or allow them to be directly concerned in its management, if they themselves are directly 'disqualified' from childcare.
 - Internal candidates or others personally known to the interview team are be treated in exactly the same way as other candidates, and external candidates declare if they know or are connected to a current member of BSN staff.
 - Safer Recruitment training is undertaken by members of the Board of Management and Senior Leaders and other key personnel involved in recruitment
 - The BSN commitment to Safeguarding and Child Protection through Safer Recruitment is publicly shared and, updated as necessary, on the BSN Careers page of the BSN website.
- The BSN requests the following criminal record checks and, if applicable, teachers' status checks.

	Before final interview	Before start date
ICPC / VOG *		✓
Prohibition from teaching (UK teachers only)		✓
Prohibition from management (UK teachers or managers only)		✓

EEA online check*		✓
Failed induction or probation**		✓
Identity check (usually passport)		✓
Completed staff record form		✓
Work permit and visa (if applicable)		✓

*International Child Protection Certificate (ICPC) - Incl' a criminal records check (every country the applicant has lived in over the last 5 years) - for candidates have not been resident in the UK or the Netherlands for the last five year period.

These checks must be carried out specifically for the BSN who will retain the original documents.

The BSN holds a Single Central Register (SCR) within their HR information system containing all the afore-mentioned documentation. Background checks for anyone who is engaged in regular work for the BSN with the opportunity for contact with children must be recorded in the SCR.

This includes:

- All staff, including staff with a short term contract)
- Interns
- Regulated volunteers**
- Peripatetic staff
- Governors
- BSN catering and cleaning staff
- External CCA providers

***One-off volunteers do not need to be included on the SCR, however they must not be unsupervised or undertake any kind of personal care of students.
(See Appendix 13 Guidelines for Volunteer).*

Guidelines for Contractors on site

Refer to BSN Visitors Policy

The Head of Security, in coordination with HR, is responsible for ensuring that companies supplying staff to the BSN provide formal confirmation that these members of staff have had successful background checks and are suitable to work with children.

For visiting contractors, unless relevant security checks have been carried out, they must be accompanied by a nominated employee at all times and have no

unsupervised access to students, data or equipment.

BSN Volunteers Guidelines

The BSN welcomes help on a voluntary basis. All offers of voluntary help will be considered and approved by a member of that site's Senior Leadership team.

In order to ensure a common understanding, all volunteers must read and sign an agreement to indicate their agreement to the points raised. The signed agreement will be kept on file at the relevant school.

For further details regarding volunteers within the BSN, please see Appendix 13 or refer to the BSN Volunteer Policy and sign-up form (See Appendix 14)

An overview of the purpose and times of when volunteers will be in school will be held by the relevant school office.

No volunteer should be with a student in a one to one situation without supervision unless appropriate background checks and a proper induction (including safeguarding training) has been carried out. Even after the background checks have been successfully completed it is still recommended that volunteers keep situations involving one to one contact with students to a minimum and where necessary in open, easily observed school areas.

Volunteers are required to have read the school's emergency evacuation policy and procedure; to have completed Safeguarding and Child Protection training and respect the confidentiality of school circumstances.

Volunteers must report to the reception on arrival at school, sign in and wear a volunteer badge / sticker or lanyard. A VOG Declaration will be needed for all adults who are involved in:

- Accompanying students overnight on residential trips (overnight is defined as being with the students between 2am - 6am)
- Regular activities where they are working independently with students e.g. helping with sports clubs or * 'regulated' volunteering (see appendix 13) on at least 3 occasions during a 30 day period or more than 5 times in academic year.

The BSN carries insurance to cover its liability in respect of its staff, students and volunteers during normal school activities.

13. Managing Allegations Against Staff (or additional adults) and Confidential Reporting (Whistleblowing)

All staff should be aware of their duty to raise safeguarding concerns, where they exist, about the attitude or actions of a member of BSN staff, a volunteer, a contractor or visitor with their Headteacher immediately (or with the CEO, if it concerns the Headteacher), using the BSN Confidential Reporting policy.

All staff and volunteers are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all students must be beyond reproach.

A safeguarding allegation is any information which indicates that a member of staff, a volunteer, a contractor or visitor may have:

- Behaved in a way that has harmed a child or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in such a way that indicates he or she would pose a risk of harm if they worked regularly or closely with that or any other child.

This applies to any child that the member of staff, volunteer, contractor or visitor has contact with in their personal, professional or community life within (and beyond) the BSN.

If the allegation concerns the CEO then the Chair of the Board of Governors must be informed.

14. Impact of Abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives. However most adult survivors agree that the emotional scars remain, often well buried.

For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse. It may well be lead to them experiencing unequal and destructive relationships and/or long-term medical or psychiatric difficulties. The BSN will do everything it is able to reduce the impact of abuse as far as is possible during the time that the child is in our care. The action points for this will vary from child to child depending on the type of abuse, their age, circumstances and personal development.

15. Provision of Support

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved. The BSN supports children, families and staff by:

- Taking all suspicions and disclosures seriously
- Ensuring the DSL keeps all relevant parties appropriately informed, whilst maintaining the required levels of confidentiality and is the central point of contact
- Responding appropriately and sympathetically to any request from children or staff for support linked to distress or anxiety
- Storing records securely using a confidential online management system
- Offering details of helplines, counselling or other avenues of external support
- Following the procedures laid down in the BSN Confidential Reporting Policy

- Co-operating fully with relevant statutory agencies
- Child-friendly guidelines for seeking support are clearly visible within the school.

16. Online Safety and Safer Use of Technology

The BSN IT systems have firewalls installed, however all staff should be aware of content and context of internet-based materials used in teaching and learning. Details regarding responsible use of technology at the BSN can be found in the BSN e-safety policy, the Online Safety policy and also the Staff Ipads - Acceptable use policy. These policies are constantly evolving in response to rapid change in technology and accessibility of information.

Further details for incidents involving mobile devices and/or school devices, involved in Child on Child abuse, can be found in Appendix 5.

17. Use of Cameras in EYFS

BSN Students regularly have their photographs taken to provide evidence of their achievements for developmental records in the younger year groups, especially the Early Years Foundation Stages (EYFS) via Tapestry (online recording software). They also have them taken for displays around school and to be used within published items on the BSN Compass (the BSN staff and parental platform).

School-owned devices should always be used for this purpose and also for any other activities which are to be photographed or captured on video. Staff, visitors, volunteers and students are not permitted to use their own mobile phones or cameras in EYFS, or whilst working in school as a volunteer. Devices with camera functions are prohibited in the toilets and changing areas.

Whilst parents attend an explanation of the sharing of photographs on Tapestry and must give consent for this. Great care must be used in all areas of school, inclusive of school activities off-site.

18. Training, including Induction

Current Staff on the BSN payroll

It is important that all staff have training to enable them to recognise the possible signs of abuse or issues of a safeguarding nature. They should also understand how to keep their practice safe and to know what to do if they have a concern. All staff employed by the BSN will complete training as requested without exception.

This happens in the form of annual face-to-face refresher training at the start of each year, which is site specific and provided by one of the DSLs. This also applies to Central Services staff, will also receive training from the DSL based in the Central Services and Business Units.

In addition, the BSN requires that every member of staff must complete an online course in Child Protection within International Schools. Staff will be expected to carry out regular training - at least once every two years as a minimum, in the form of the most up-to-date Child Protection Refresher course available from EduCare. At the point of contract, staff will be issued with an EduCare login by HR on-boarding services and there is an expectation that all staff will carry out the 'Child Protection for International Schools' and the 'GDPR in education' online training within two months of starting their job.

Designated Safeguarding Leads:

All DSLs (including Deputy DSLs) will receive accredited Level 3 Advanced Safeguarding training through an external provider, and this should be updated at least every two years. The DSL will remain up to date with the risks and best practice involved with extremism or radicalization as well as other contextualized safeguarding issues such as Female Genital Mutilation, Forced Marriage and Child Sexual Exploitation.

They should also remain familiar with the most recent 'Keeping Children Safe in Education' documents which are regularly updated by the UK government (the most recent being Sept 2022) and any equivalent Dutch documentation.

New Staff and Governors (Induction):

All new staff and governors, irrespective of their role, will receive training during their induction. This training includes an introduction to Safeguarding procedures at the BSN as well as familiarisation with Dutch Child Protection systems and protocols, such as the Meldcode (Reporting Code). This is organised through their campus DSLs and the BSN Induction team. As identified above, all new staff will also be expected to complete the same online training courses in Child Protection in International Schools and the 'GDPR in education' within their first two months at the BSN.

Regulated Volunteers and external CCA providers

All volunteers in regulated activity (3 days inside a period of 30 days or 6 times or more, in an academic year) and external CCA providers are required to complete face to face training with one of the BSN's trained DSLs. During such training they will be made aware of school specific safeguarding procedures and personnel. Both the CCA providers and Volunteers will also be encouraged to complete online EduCare training in Safeguarding and Child Protection for International Schools. Irregular non-regulated volunteers will be expected to follow the procedures listed in section 19 below about site safety and visitors to school.

Organisation and Monitoring of Training

The BSN Safeguarding Chairperson will ensure that safeguarding training is planned

and provided for all staff every school year. The chair will also ensure that bi-annual Advanced Safeguarding Training is carried out by all the DSLs (and when appropriate the Headteachers) on each campus. The storage of training records and requests are centralised through the Safeguarding Committee.

19. Use of Reasonable Force

The BSN recognises that touch is frequently appropriate in the context of working with children and all staff have been trained to ensure they are clear about their professional boundaries. We recognise that the adoption of a 'no contact' policy could leave staff unable to fully support and protect our students and almost impossible to exercise, especially in the younger years of the Junior Schools.

Staff (outside the younger year groups) must only ever use physical intervention as a last resort, and it must always be the minimal force necessary to prevent injury or damage to property, **Veilig Thuis, 2022**.

We acknowledge that there may be circumstances when it is necessary to apply reasonable force, in terms of restricting a student's actions, if they are being aggressive or presenting a threat or risk to themselves, other students, staff or their surroundings.

In particular it is important to recognise those children who are more vulnerable, such as children with AEN or certain medical conditions or newly arrived EAL students. It is also important to make every effort to reduce the occurrence of challenging behaviour and therefore the need for reasonable force. Online training in the 'Use of Reasonable Force' is also available to all staff via the online training platform EduCare.

If formal physical intervention is used, it must be recorded and parents should be informed on the same day or as soon as practicably possible. We understand that physical intervention that causes injury or distress to a child may have to be considered under the BSN complaints or disciplinary procedures.

20. Site Security and Visitors

The BSN takes the security of our students and staff very seriously and fosters a culture of awareness amongst all stakeholders. School gates are locked during the day and are monitored by an on-site security guard. A closed circuit monitoring system is in operation, and all visitors are expected to observe the BSN Visitors Policy, which specifies the safeguarding and Health and Safety regulations (written in both English and Dutch) whilst on BSN property. These should be shared by the school office staff on arrival at the school. The visitor is then required to sign the visitor's book or iPad (if one available at the site) to acknowledge they are entering the school (or part of a school site) and agree with the stipulated guidelines and expectations.

All adults who are not previously known to the school will be expected to enter each school site via the main entrance, provide official photographic ID (for example

a passport, driving license or National ID card). **Those adults who do not have valid Photo ID and are not known to the school should be refused further entry to the school.**

If such visitors are able to show photographic verification, they will be asked to read the school Health & Safety and safeguarding expectations, before signing in and only then will be issued a visitors badge or lanyard. These visitors **must still be accompanied** by a member of BSN staff at all times, whilst in the building or school grounds.

Adults who are 'known' contractors will also be expected to enter each school site via the main entrance; provide official photographic ID; sign in and have their information checked against the Single Central Register (SCR), to ensure they hold a valid VOG (or equivalent Police Check). Only if they satisfy all these conditions will they be issued a visitors badge or lanyard and be allowed to enter the school.

Parents and visitors who are simply delivering or collecting their children at the appropriate times (beginning and end of school) or attending school events and are known to the school do not need to sign in. This is felt to be safe as they are well-known to the BSN staff and these are occasions when there are numerous staff on duty and able to safeguard the school and students. Parents who visit the school site at times other than the start and end of the day are expected to report to the main office to make the purpose of their visit known and follow through the same procedures as outlined above for other visitors not officially logged within the SCR.

21. Visiting Speakers

Refer to BSN Visitor Policy and also see Appendix 12 for visiting speakers proforma.

When inviting speakers to the BSN, the following checklist is completed:

- A formal approval by the Headteacher or other associated Senior Leader and a clear understanding of why the speaker has been chosen must be sought.
- There should be a list of appropriate checks on the suitability of the person, which may include internet searches and/or contacting other schools where the person has spoken previously for references.
- Where possible speakers should be invited from an established company, charity or other group whose aims are well-documented.
- The speaker must sign to state that they understand they will abide by the
- school's equality commitments and the 'Visiting Speakers Agreement' with stipulated conditions, that echo these points as specified in Appendix 12. This includes the understanding that there must be no statements that might cause offence to others, undermine the tolerance of other faiths or beliefs, or include any extremist material.
- The speaker will be expected to talk with the organising School Leader about the content of the presentation before the event and if required can involve further consultation with the Headteacher or an appropriate Senior Leader .
- Talks and presentations will not be used to

- raise funds without the prior written permission of the Headteacher.
- Visitors should arrive at reception in good time to sign in and be professionally prepared (including setting up related technology). They should also build in appropriate time to speak to the relevant School leader in advance of speaking, they must be supervised at all times and not be left alone with pupils unless they have the relevant confirmed school and police checks (as per section 19 above)
- Visiting speakers should understand that their presentation will be brought to an early end if the content proves unsuitable.

22. Information Sharing and Confidentiality

Information sharing is vital in identifying and tackling all forms of abuse. All personal information will be processed fairly and lawfully in line with our duties under the GDPR protocols referenced in the Data Protection Act 2018 and will be held safely and securely.

However, we fully recognise that even the GDPR protocols cannot be used as a barrier to sharing information, in circumstances when the failure to do so could result in a child being placed at risk of harm. All matters relating to child protection are confidential and the Headteacher or DSL will disclose any information about a student to other members of staff or other schools on a need to know basis only.

All staff are made aware that they have a professional responsibility to share information with other agencies, in the interests of properly safeguarding the children in their care. They also cannot promise to keep secrets on behalf of a child or family, which might compromise a child's future safety or well-being. When a child, about whom concerns have been raised and recorded, leaves the school the DSL will consider if it would be appropriate to share information with the new school in advance of the child leaving. This would entirely be done to ensure that support is in place for when the child (and their family) arrives, with the specific aim of safeguarding the children concerned.

23. Concerns and Complaints

The BSN Complaints Policy will be followed where a child or parent raises a concern about poor practice towards a child that initially does not reach the threshold for child protection action. Concerns or complaints made about staff performance will be managed using the BSN Staff Conduct Improvement and Disciplinary Procedures (SCIP)


(referenced in Appendix 2).

24. Monitoring and Review

The BSN Safeguarding & Child Protection policy and procedures will be monitored and evaluated by:

- Annual discussion and review by the BSN Safeguarding Committee.
- Termly safeguarding reports, including reference to any trends, compiled by the DSLs on each site and shared by the Committee's Chairperson, with the Governor responsible for Safeguarding.
- Completion of the annual safeguarding report, including analysis of any data trends across specific sites or across the BSN as a whole, for the Governing Body by the Committee Chairperson, in collaboration with all the DSLs across the BSN.
- Discussions with children and staff.
- Scrutiny of data and risk assessments.
- Scrutiny of the school's Single Central Register focusing on new staff recruitment; new contractors working at the BSN; any regulated volunteers or CCA providers.
- Monitoring of logs of bullying/racist/behaviour incidents.

This policy will be reviewed on an annual basis and in line with legislative changes in the Netherlands or in response to guidelines and recommendations from the DFE, UK.

Review date:	Next review:	Board of Management:
May 2023	May 2025	

Appendix 1

Further information and references

Glossary

BSO	British Schools Overseas
DPA	Data Protection Act, a bill to make provision for the regulation of the processing of information
DSL	Designated Safeguarding Lead
GDPR	General Data Protection Regulation is a regulation in EU law on data protection and privacy for all individuals within the European Union
KCSIE	Keeping Children Safe in Education – UK legislation
Meldcode	Five step reporting code for domestic violence and child abuse in The Netherlands
Onderzoeker	Veilig Thuis researcher/case manager
Prevent Duty	The Prevent Duty is the duty in the Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism, UK Government
Raad voor	Child Protection Law Kinderbescherming
Radicalisation	The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups, UK Government definition
Veilig Thuis	The advisory and reporting centre for domestic violence and child abuse in The Netherlands
Leerplicht	Is the governmental department responsible for compulsory attendance at school within the Netherlands.
Centrum Jeugd Centre & Gezin (<i>CJG</i>)	Is the local municipalities' Youth and Family

Safeguarding Related BSN Policies, Procedures and Guidelines

BSN Anti-Bullying Policy
BSN Behaviour and Sanctions Policy
BSN Parental Complaints Procedure
BSN Confidential Reporting Policy
BSN Disciplinary Policy
BSN Educational Trips and Visits Policy
BSN First Aid Policy
BSN Health & Safety Policy
BSN Online Safety Policy
BSN Staff I-Pad acceptable use Policy
BSN e-safety Policy
BSN Procedure for Managing Incidents of Peer produced Sexual Images (Sexting)
BSN Recruitment and Selection Policy Incorporating Safer Recruitment
BSN Sex & Relationships Policy
BSN Staff Code of Conduct
BSN Staff Conduct Improvement Policy
BSN Managing Medical Conditions (including administration of Medicine)
BSN Visitor Policy
BSN Volunteers Policy
BSN Procedures for recognizing risks and vulnerabilities of extremism and radicalisation
BSN Procedure for Management of Incidents of Peer-Produced Sexual Images

The above list is not exhaustive but when undertaking development or planning of any kind the school will need to consider safeguarding matters.

References:

Wet op de Jeugdzorg, 2005 (NL Youth Care Act)
Keeping Children Safe in Education (UK Department for Education, 2022)
Ministrie van Justitie en Veiligheid (Ministry for Justice and Safety)
Department of Education, UK
Children's Act, UK Government,
NL Government, 2013,
Revised Prevent Duty Guidance for England and Wales 2021
NSPCC Learning 2022 & 23,
Working Together to Safeguard children, HM Government UK , 2018
UK Equality Act 2010
The 2021 UK Domestic Abuse Act

Appendix 2

Key Safeguarding Personnel and Contact Details

CEO:

Heath Monk Heath.Monk@britishschool.nl

Designated Safeguarding Governor:

Paul Ellis Paul.Ellis@britishschool.nl

Chair of Safeguarding Committee:

Karren van Zoest karren.vanzoest@britishschool.nl

Chair of Health & Safety Committee:

James Oxlade James.oxlade@britishschool.nl

BSN Designated Safeguarding Leads

Junior School Leidschenveen (JSL)

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Junior School Vlaskamp (JSV)

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Vicki Broderick Vicki.Broderick@britishschool.nl

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Leah Smith Leah.Smith@britishschool.nl

Senior School Voorschoten (SSV)

James Lloyd James.Lloyd@britishschool.nl

Kathy Moore Kathy.Moore@britishschool.nl

Mark Bennett Mark.Bennett@britishschool.nl

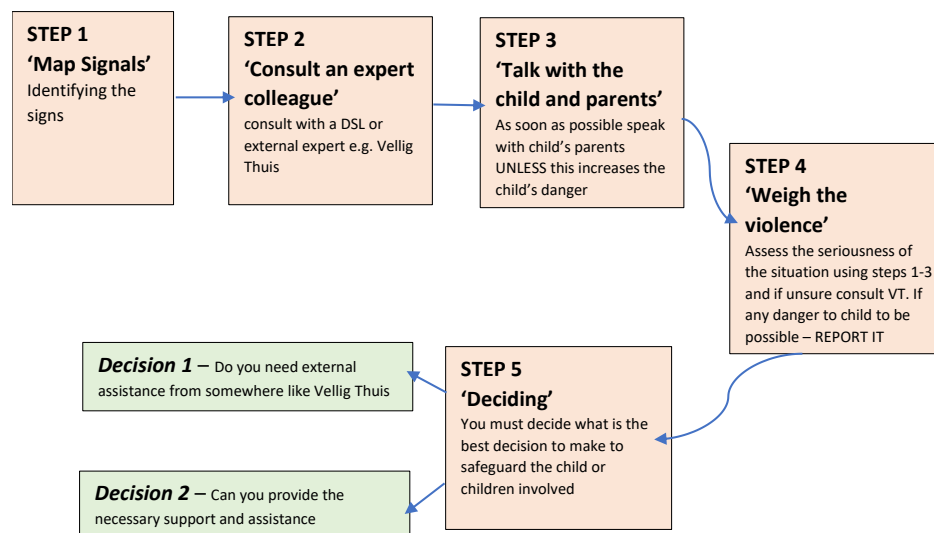
Central Services (CS)

Barbara Gemen Barbara.Gemen@britishschool.nl

Appendix 3

The Meldcode (The Dutch Reporting Code)

The figure below shows the five steps of the Reporting Code for Domestic Violence and Child Abuse as specified within the Meldcode. To support the decisions made in step 5, an Assessment Model has been added to steps 4 and 5 (see page below).



In Step 5, two decisions are made:

- The decision as to whether or not an official report needs to be filed at Veilig Thuis (directly translated as 'Safe Home')
- To decide whether it is possible to arrange appropriate assistance without Veilig Thuis

It is very important that both decisions are made in step 5 and that they follow the previous steps in the order mentioned.

The DSL has to assess if it is necessary to file a report, based on the fact that the Child Protection or Domestic Violence signs displayed seem to be confirmed; and after conducting an interview with the parents – if deemed safe to do so without further endangering the child/ren.

Thereafter, they must decide if the school, as well as the people involved (parents/guardians), are able to effectively offer to assist or to arrange assistance for those involved. If it is felt there is an acute risk or structural insecurity to those involved then an immediate report should be filed with Veilig Thuis.

NB. If the decision is made to assist but the risk becomes acute or there becomes a structural lack of security then a you should revert to filing a report with Veilig Thuis.

Reporting is not compulsory and can be done anonymously and simply for advice – this might be decided at either Step 2 or 4 in above diagram.

The chart of questions below is to try and further guide the use of the 5 steps of the Dutch reporting code as shown above:

1. Assess suspicions

I have completed steps 1 to 3 of the Reporting Code (see above) and

A: based on my findings from these steps there is no further action needed: make a record and close the case

B: I have a strong suspicion that there is a case of domestic violence and/or child abuse
The DSL/Headteacher at my school have been informed

2. Safety

Based on steps 1 to 4 of the Reporting Code, as a school, we consider that there is an immediate and/or structural lack of safety:

A: NO -> go to assessment 3

B: YES or unsure -> immediately seek advice from Veilig Thuis by telephone. The assessments below will then be worked through by Veilig Thuis employees.

3. Help

Are the school able to effectively offer or arrange assistance, and can the threat of possible domestic violence or child abuse be averted?

A: NO -> file a report with Veilig Thuis. Within 5 days they will make a decision and report back to the person who filed the report.

B: YES -> go to assessment 4

4. Help

Do the people involved accept the assistance that has been arranged under assessment 3 and are they prepared to actively participate?

A: NO -> file a report with Veilig Thuis

B: YES -> get things in motion, agree timescales that will ensure that the effect of the assistance is measurable or noticeable. Thoroughly implement this plan as much as possible and document it. DSL will complete a plan of action and this will be recorded. This plan should be implemented and continue with assessment 5 below.

5. Result

Has the assistance led to the agreed results and timescales with regard to the safety, the welfare and/or the recovery of the people directly involved? **A: NO** -> file a report with Veilig Thuis

B: YES -> complete the assistance plan with well-defined agreements about monitoring the safety of all people involved.

Appendix 4

Procedure for Managing Allegations Against Staff

Outcome of Allegations

Outcomes of Safeguarding allegation investigations should be identified as one of following:

Outcome Type	Definition	Action after Investigation	Recording
Substantiated	There is sufficient evidence to prove the allegation.	Discussions with HR and/or other professionals about referrals to DBS and/or Disciplinary Hearing.	<p>There should be a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached. This should be kept in the confidential personnel file of the accused, and a copy provided to the person concerned.</p> <p>The record should be retained at least until the accused has reached normal pension age, or for a period of 10 years from the date of the allegation if that is longer.</p>
False	There is sufficient evidence to disprove the allegation.	Where the allegation is found to be false, unsubstantiated, or malicious, the information should not be included in any reference.	
Unsubstantiated	This is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.		

Malicious	There is sufficient evidence to disprove the allegations and there has been a deliberate act to deceive.		Details of allegations that are found to have been malicious should be removed from personnel records.
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In addition, there is a further outcome type ('unfounded'), which may be used after liaison with HR/legal advisors:

Unfounded: there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.

Appendix 5

Specific Safeguarding Issues – Child on child (Peer on peer) abuse, including Peer-produced Sexual Images (Sexting)

Refer to BSN Procedure for Management of Peer produced Sexual Images

All staff should be aware that children can abuse other children, referred to as child-on-child (peer on peer) abuse.

- Child on Child abuse is defined as any form of harmful sexual behaviour between children of any age or at any stage of development. NSPCC 2023
- Peer on Peer abuse is any form of harmful sexual behaviour between children of the similar age or stage of development. NSPCC 2023

This abuse can happen both inside and outside of school, including online and all staff can play an important role in both preventing it and responding where they believe a child may be at risk. It is important if staff have any concerns regarding child-on-child (peer on peer) abuse they should speak to their designated safeguarding lead. It is also essential that all staff understand the importance of challenging inappropriate behaviours between children. All staff are essential in creating a culture that does not normalise unacceptable or abusive behaviours between children but promotes a culture which encourages students to come forward to report it. ***Keeping Children Safe in Education (UK Dep' for Education, 2022)***

Child on child (peer on peer) Abuse can occur from one or more children to another child and can take many forms. This can include (but is not limited to):

- Bullying (including cyberbullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation, distress or alarm.
- Intended physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- Sexting (youth produced sexual imagery and other forms of cyber manipulation) - both consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Initiation/hazing type violence and rituals.

- Prejudiced behaviour - a range of behaviours that cause a person to feel powerless, worthless or excluded and that relates to prejudice. Such prejudices can be around belonging, identity and equality, or linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity (or other protected characteristics). **KCSiE (UK Department for Education, 2022)**

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Different gender issues can be prevalent when dealing with child on child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

- Banter: the playful and friendly exchange of teasing remarks.
- Hazing: the practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group.)

The BSN takes the following steps to minimise or prevent the risk of child on child (or peer on peer) abuse through:

- An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.
- Giving assemblies to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying.
- PSHE and/or Life Skills lessons to reinforce the message through stories, role play, current affairs and other suitable activities.
- Online safety lessons as part of Computing and PSHE curriculum.
- BSN Equality Week which takes place every year at the Senior Schools.
- Creating surroundings where everyone feels confident and at ease in school.
- Good supervision, especially in areas where children might be vulnerable, such as consistent monitoring of new digital forms of exploitation and coercion, as they become used in the online world, that could have a possible impact on BSN students.

The BSN has a clear Behaviour Policy and within this, each school has clear behaviour guidelines. In addition the BSN has an Anti-Bullying Policy, which includes Cyberbullying, which all staff follow.

All allegations of child on child (peer on peer) abuse should be passed to the DSL immediately. They will then be investigated and responded to, in line with the Managing Concerns procedure within this policy. Children who are the perpetrators of these types of abuse are also recognised as being at risk and along with their families will receive appropriate support. Depending on the incident and harm caused, the police and Veilig Thuis may be involved.

Sexting is the exchange of self-generated sexually explicit images through mobile picture messages or webcams over the internet. Sexting is often seen as flirting by children and young people who think that it's part of normal life. Often,

incidents of sexting are not clear-cut or isolated; schools may encounter a variety of scenarios. Sexting incidents can be divided into two categories – aggravated and experimental.

Aggravated incidents of sexting involve criminal or abusive elements beyond the creation of an image. These include further elements, adult or criminal involvement; or abusive behaviour by minors such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a minor who is pictured.

Experimental incidents of sexting involve youths taking pictures of themselves to share with established boyfriends or girlfriends, to create romantic interest in other youth, or for reasons such as attention seeking. There is no criminal element (and certainly no criminal intent) beyond the creation and sending of the images and no apparent malice or lack of willing participation.

Because of the prevalence of sexting, young people are not always aware that their actions are illegal. In fact, sexting as a term is not something that is recognised by young people with the 'cultural norms' for adults often being somewhat different. However, in the context of the law it is an illegal activity and young people must be made aware of this.

Much of the complexity in responding to youth produced sexual imagery is due to its legal status. Making, possessing and distributing any imagery of someone under 18 that is 'indecent' is illegal. This includes imagery of yourself if you are under 18. 'Indecent' is not defined in legislation. The law criminalising indecent images of children was created to protect children and young people from adults seeking to sexually abuse them or gain pleasure from their sexual abuse. It was not intended to criminalise children. Despite this, young people who share sexual imagery of themselves, or peers, are actually breaking the law.

Disclosures about youth produced sexual imagery can happen in a variety of ways. The young person affected may inform a class teacher, the DSL in school, or any member of the school staff. They may report through an existing reporting structure, or a friend or parent may inform someone in school, or inform the police directly.

Any direct disclosure by a young person should be taken very seriously. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

When an incident involving youth produced sexual imagery is disclosed or reported, the following actions should take place:

- The incident should be referred to the DSL as soon as possible.
- The DSL should hold an initial review meeting with appropriate school staff.
- There should be subsequent interviews with the young people involved (if appropriate).

- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process if there is a concern that a young person has been harmed or is at risk of harm, a referral should be made to Vellig Thuis or the police immediately. (see Appendix 3 above)

Appendix 6

Specific Safeguarding Issues - Extremism and Radicalisation

Refer to BSN Guidelines for Recognising Risks and Vulnerabilities of Extremism and Radicalisation

We recognise that children are vulnerable to extremist ideology and radicalisation. This is the active opposition of a person's fundamental values. We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. **KCSiE 2022**

We will ensure that:

- Through training, staff have an understanding of what radicalisation and extremism is, why we need to be vigilant in school, and how to respond when concerns arise.
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our school by using effective filtering and usage policies.
- The DSL completes online training for recognising the signs of extremist or radicalised behaviour and will act as the point of contact within their school for any concerns relating to radicalisation and extremism.
- The DSL will make referrals in accordance with Dutch child protection procedures and will represent our school at meetings as required.
- Through our curriculum, we will promote the spiritual, moral, social and cultural development of students. We encourage students to respect the fundamental values of democracy, the rule of law, individual liberty, and the mutual respect and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject in the school and, where political issues are brought to the attention of the students, reasonable steps have been taken to offer a balanced presentation of opposing views.
- We will use relevant information, tools and resources to help our staff and parents recognise and address extremism and radicalisation in young people.
- Any member of staff who has concerns that a student may be at risk of radicalisation or involvement in terrorism, will speak to the DSL. They should then follow normal safeguarding procedures.

Appendix 7

Specific Safeguarding Issues - Children Missing Education (CME)

Whilst an international school setting presents a transient roll of students who move from school to school and country to country on a regular basis, the BSN recognises its duty to ensure that students who do not attend school are monitored and supported. We recognise that a child going missing from education is a potential indicator of abuse or neglect.

When students leave the school, the BSN will endeavour to make contact with the student's new school and organise transfer of information. Relevant Child Protection information is shared with new schools and the BSN requests data and Child Protection information from the student's previous school on admission. See Information Sharing and Confidentiality – paragraph 21.

At the point of admission, the BSN will make every attempt to obtain more than one emergency contact number for each child registered at the school to ensure we are able to make contact with a responsible adult when a child missing education. This also supports the school in making immediate contact if issues identified as a welfare and/or safeguarding concern arise. We will ensure that we follow procedures for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in the future. We will ensure that we report children missing education to the Dutch authorities.

**This will now become even more secure since the Dutch Senate have decided to register the BSN as a B4 school (private international or foreign school) with the Dutch authorities.*

Appendix 8

Specific Safeguarding Issues - Child Sexual Exploitation

We recognise that Child Sexual Exploitation (CSE) is a form of child sexual abuse involving criminal behaviours against children and young people which can have a long-lasting adverse impact on a child's physical and emotional health. Sexual exploitation involves an individual adult or group of adults taking advantage of the vulnerability of an individual or groups of children or young people.

Victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. It may also be linked to child trafficking.

The BSN addresses the risks of sexual exploitation in the PSHE, Life Skills and within its SRE curriculum.

A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns as they would for any other type of abuse. All staff are made aware of indicators of such sexual exploitation and the fact that the victim may have been sexually exploited even if the sexual activity appears consensual.

CSE can occur over time or be a one-off occurrence and does not always involve physical contact, even happening at times, without the child's immediate knowledge for example through others sharing videos or images of them on social media. **KCSiE 2022**

All concerns of child sexual exploitation are reported immediately to one the BSN DSLs who will then follow normal (Meldcode) safeguarding reporting procedures.

Appendix 9

Specific Safeguarding Issues - 'Honour Based' Violence and Female Genital Mutilation

Female Genital Mutilation (FGM) is condemned in the Netherlands and is classed as child abuse under the **Dutch Youth Care Act**. It is also classed as a form of child abuse and crime of violence against women in the UK.

Section 5B of the Female Genital Mutilation Act 2003

We recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of FGM and other forms of 'honour based' violence (HBV). Guidance and further online training is available to all BSN staff. If staff have a concern regarding a child that might be at risk of HBV they should inform the DSL who will follow (Meldcode) safeguarding reporting procedures.

Appendix 10

Specific Safeguarding Issues - Mental Health

Mental health is a state of well-being in which every individual realises his or her own potential, can cope with the normal stresses of life, can work productively and fruitfully, and is able to make a contribution to her or his community. **(World Health Organisation, Jan 2020)**

At the BSN, we aim to promote physical and emotional wellbeing for every member of our student body. We pursue this aim using whole school approaches, and specialised, targeted approaches aimed at vulnerable students. In addition to promoting physical and emotional wellbeing, we aim to recognise and respond to mental ill health. All staff should be aware that mental health problems can, in some cases, be an indicator

that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

KCSiE (UK Department for Education, 2022)

Mental ill health covers a wide range of emotional conditions that affect a person's mood, thinking and behaviour. Changes in mood and behaviour may be a normal part of a young person's development and generally passes with their own learnt resilience and general adult support. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, however education staff, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem. Staff may become aware of warning signs which indicate a student is experiencing mental health or emotional well-being issues. These warning signs should always be taken seriously and staff observing any of these symptoms, or who are concerned about the mental health or wellbeing of a student should communicate their concerns to the appropriate Senior Leader (HoY in Senior School, Year Leader in Junior School) or go directly to the School Counsellor or School Nurse.

They will assess the situation and then report to the DSL if there is a safeguarding risk. Not all mental ill health will need the intervention of the DSL, in which case they might be able to offer professional advice or explain who would be the best mental health professional to consult.

If there is a fear that the student is in danger of immediate harm as a result of their emotional state, then the School Counsellor/School Nurse and Headteacher or DSL should be informed straight away. They will instigate the normal safeguarding procedures if appropriate. With full parental and professional support - it still may well not be a safeguarding issue. The school recognises that only medical professionals should make a formal diagnosis of a mental health condition. The school will use a number of possible support strategies such as intervention from the School's Counsellors, Nursing Team and Mental Health First Aiders.

Where severe problems are identified, the parents will be advised to seek a referral for external psychological help. This will be done in consultation with the School Counsellor/School Nurse, a school Senior Leader, the student and their parents/guardian. If parents choose not to arrange this support, the DSL will be

informed as this will make it a safeguarding matter.

The skills, knowledge and understanding needed by our students to keep themselves and others physically and mentally healthy and safe are included as part of our developmental Life Skills/Tutor Time and Mental Health and Wellbeing curriculums. There is an emphasis on enabling students to develop the skills, knowledge, understanding, language and confidence to seek help, as needed, for themselves or others.

Mental ill health is a broad issue and includes a wide range of signs and symptoms. Behavioural changes do not necessarily point to mental ill health – they may be temporary and caused by a negative experience or distressing life event. However, persistent disruptive or withdrawn behaviour may indicate an underlying problem.

Possible warning signs include:

- Physical signs of harm that are repeated or appear non- accidentally
- Changes in eating or sleeping habits
- Increased isolation from friends and family – becoming socially withdrawn
- Changes in activity and or mood
- Lowering of academic achievement
- Talking about self-harm or suicide
- Abusing drugs, alcohol or other substances
- Expressing feelings of failure, uselessness or loss of hope
- Changes in clothing – e.g. long sleeves in warm weather
- Secretive behaviours
- Skipping PE or getting changed secretly
- Repeated physical pains or nausea without evident cause
- An increase in lateness or absenteeism
- Giving away items of importance
- Engaging in risky behaviours – e.g. dangerous driving or getting repeat injuries

Appendix 11

Personnel Responsible for Monitoring Completion of Safeguarding Training

The following staff identify, monitor, record and report the training needs to the Safeguarding Chairperson and are responsible for the identified groups of staff:

- All teaching, support and admin staff, health team, concierges, Co-curricular staff and volunteers – The DSLs across the different school sites (Usually a member of each schools SLT)
- Operations Team including Communications, Security and IT teams – Chief Operating Officer (COO) under the direction of the DSL for the BSN's Central Services and business units
- All Central Services staff including those in the Language Centre and the ILA – the DSL for the BSN's Central Services and business units
- Governors and CEO – Chairperson of the Safeguarding committee

These personnel are responsible for setting up online training and requesting training updates when necessary.

DSLs and deputy DSLs are responsible for requesting updated Advanced Safeguarding Training from an external Safeguarding consultant before their two years expire.

The ILA, through the Professional Development Coordinator, will organise appropriate, relevant and accredited training on request from the Chair of the Safeguarding Committee.

Appendix 12

Agreement for Visiting Speakers to the BSN

Thank you for agreeing to speak to BSN Students. The safety of our students is of paramount importance to us.

Please read and sign this agreement, indicating that you agree to abide by our safeguarding principles as you deliver your material to our students.

Context for Safeguarding Requirements

“Specified authorities will need to demonstrate.... robust safeguarding policies in place to identify children at risk... [also] setting out clear protocols for ensuring that any visiting speakers – whether invited by staff or by children themselves – are suitable and appropriately supervised.” ***Prevent Duty Guidance, HM UK Government April 2021***

Visiting Speakers Agreement

- I agree to abide by the school’s equality commitments.
- I agree that I will make no statements that might cause offence to others, or otherwise undermine tolerance of other faiths or beliefs.
- I agree that I am not presenting any extremist material.
- I agree not to photograph any students without prior permission and as overseen by BSN staff.
- I agree not to go anywhere unsupervised with any students.
- I agree not to exchange private details such as telephone numbers, email addresses or social media identities with students.
- I will clear any organisational links for communication with the teacher who has invited me to visit.
- I will not use this talk to raise funds unless I have received prior written permission from the Headteacher or an SLT member.
- I understand that if I present any offensive material to students, my talk will be brought to an early end.

Signed: _____

Date: _____

Appendix 13

Agreement and Guidelines for Regulated Volunteers to the BSN

Also refer to BSN Policy for Volunteers

The BSN welcomes offers of help on a voluntary basis. All such offers of voluntary help must be considered and approved by a member of the Senior Leadership team.

In order to ensure a common understanding, all volunteers must read and sign below, to indicate their agreement to the points raised. The signed agreement will be kept on file at the relevant school.

Volunteers, whether involved in regulated activity or not, are seen by students and young children as safe and trustworthy. Volunteers in regulated activity are defined as being involved in six or more visits, to support an activity, in one academic year, or three visits within one month. No volunteer should be with a student in a one to one situation without supervision unless appropriate background checks and induction has been carried out. Even after the background checks have been successfully completed it is still recommended that volunteers keep situations involving one to one contact with students to a minimum and where necessary in open, easily observed school areas. Volunteer induction will include Safeguarding and Child Protection training. This training is required regardless of whether volunteers expect to come in to contact with children or not on any of their visits to school.

Volunteers are required to respect the confidentiality of information about students which is obtained at school and any such information should not be shared beyond school - this includes with other parents (even the parents of any students involved). Volunteers must not take advantage of this trust and should be sensitive to the schools ethos and values which include respect for students and the school community. Volunteers are also required to have read the school's emergency evacuation policy and procedure.

The BSN carries insurance to cover its liability in respect of its staff, students and volunteers during normal school activities. Volunteers should check that their own personal insurance cover is adequate in respect of their own liabilities. The BSN is not liable to the volunteers for loss or damage other than that covered by the BSN insurance.

Volunteers must report to the reception on arrival at school and wear a volunteer badge/lanyard. A VOG Declaration or an international police check (ICPC) will be needed for all adults who are involved in:

- Regulated activities where they are working independently with students
- Accompanying students overnight on residential trips
- Volunteering on a regular basis (more than six times per academic year or three times within one month).

An overview of the purpose and times of when the volunteer will be in school will be held by the relevant school office for the school. The names and VOGs of volunteers will be listed in the BSN's Single Central Register (SCR).

Being a volunteer in no way renders you liable for any payment or remuneration for work or time spent in support of the school.

Please refer to the BSN Parent Compass platform for access to policies and procedures.

VOLUNTEER AGREEMENT

Thank you for offering your services as a volunteer at the BSN.

Your offer of help is greatly appreciated and we hope that you will gain much from your experience.

Please read and sign this Volunteer Agreement Sheet and hand it in at school. You will receive a copy of it for your records.

- I have read the points raised in this policy and agree to them.
- I confirm that I have no previous criminal convictions/cautions/reprimands pertaining to child protection and welfare.
- I have a valid and up to date VOG declaration or International Police Check
- I have completed the Safeguarding and Child Protection training
- I have been made aware of who my staff contact person is e.g. Year Lead
- I have read the BSN Volunteer Guidelines
- I agree to support the School's aims and ethos
- I agree to treat information obtained my time as a volunteer in school as STRICTLY CONFIDENTIAL

Signed:

Name:

Date:

Appendix 14

Flow Chart for Identifying Voluntary Regulated Activity

