

BSN Safeguarding and Child Protection Policy

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Changelog

Date	Changes	Creator
January 2026	<ul style="list-style-type: none">• Addition of one-page quick-reference guide for staff• New content on “healthy and safe relationships between adults and children”• Expanded content on digital safeguarding (greater emphasis on AI)• New detailed “low-level concerns” process• Updated roles and responsibilities• Updated terminology and legal references• Updated use of reasonable force	KvZ



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BSN Safeguarding and Child Protection Policy

1. BSN Safeguarding – Staff Quick Reference

EVERYONE IS RESPONSIBLE FOR SAFEGUARDING

At BSN, the welfare of the child is always the top priority.

All staff, volunteers, contractors and visitors share responsibility for keeping children safe.

IF A CHILD TELLS YOU SOMETHING CONCERNING

DO:

- ✓ Stay calm and listen
- ✓ Take the child seriously
- ✓ Reassure them they did the right thing
- ✓ Explain you must share the concern
- ✓ Report immediately to a DSL
- ✓ Record on CPOMS

DO NOT:

- ✗ Promise secrecy
- ✗ Ask leading questions
- ✗ Investigate yourself
- ✗ Delay reporting

If in doubt — REPORT.

RECOGNISE POSSIBLE SIGNS OF ABUSE

- Unexplained injuries
- Sudden behaviour change
- Withdrawal or aggression
- Fear of certain adults



- Poor hygiene or hunger
- Truancy or missing education
- Sexualised behaviour or language

Abuse can be:

Physical | Emotional | Sexual | Neglect | Domestic | Child-on-child | Online |
Radicalisation

REPORTING PATHWAY

Staff → DSL → Meldcode Process → External Agencies if required (Veilig Thuis /
Police)

Never handle concerns alone.

DESIGNATED SAFEGUARDING LEADS (DSLs)

DSLs:

- Receive all safeguarding concerns
- Record and manage cases
- Contact external agencies
- Provide staff guidance

DSLs are listed on staff noticeboards and Compass.

CHILD-ON-CHILD ABUSE & SEXTING

- Peer abuse is taken as seriously as adult abuse
- Includes bullying, harassment, sexual violence, sexting
- Sexual images of minors are illegal
- Report immediately to DSL

ONLINE SAFETY

- Supervise learner internet use
- Report unsafe online behaviour
- Follow BSN Online Safety Policy



VISITORS & SITE SECURITY

- All visitors sign in and wear lanyards
- Contractors without clearance must be supervised
- Challenge anyone without identification

PHYSICAL INTERVENTION

- Only as a last resort
- Minimum necessary force
- Must be recorded and reported

KEY REMINDER

LISTEN – RECORD – REPORT

Never delay.

Never investigate.

Never promise secrecy.

EMERGENCY

If a child is in immediate danger:

- Contact a DSL or Senior Leader immediately
- If urgent risk: Call emergency

2. BSN Policy Statement

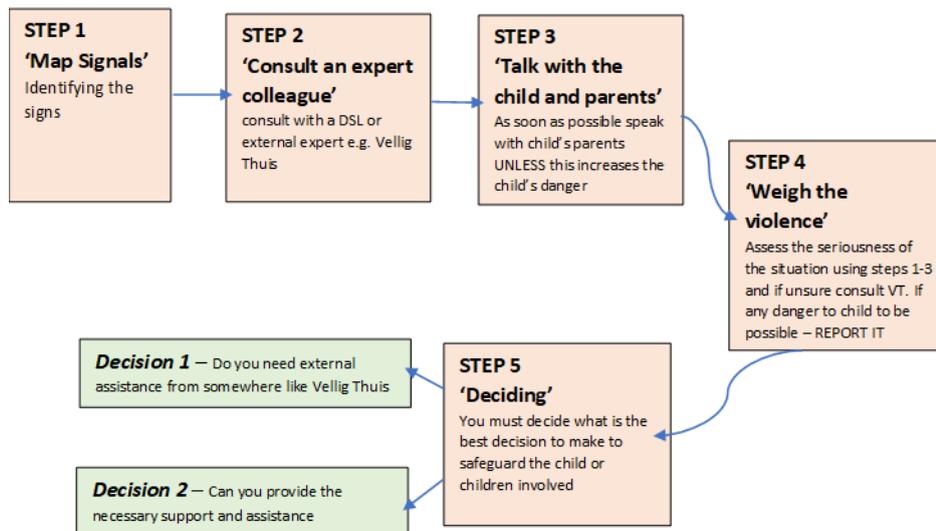
The British School in the Netherlands (BSN) recognises the moral and statutory responsibility to act in the best interests of the child at all times. It aims to enable all children to have the best outcomes through the provision of a safe and welcoming environment where all children are respected, valued 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. Children refers to any child or young adult over the age of 18 who is a learner at the BSN.

In the event of a safeguarding incident or concern, the Designated Safeguarding Lead should be informed immediately, and the Dutch Meld Code steps should be applied as follows. More information on the meld code can be found in appendix 2



3. 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 (colour, nationality, ethnic or national origin), religion or belief, sex, sexual orientation or gender reassignment marriage / civil partnership, pregnancy and maternity.



4. Safeguarding Aims

- Support every child's development in ways that will foster security, confidence and independence.
- Provide an environment in which all learners feel safe, secure, valued and respected whilst feeling confident and able to approach adults if they are in difficulty.
- Raise the awareness through annual in-person training of all staff of the need to safeguard all learners and of their responsibilities in identifying and reporting possible cases of abuse or neglect.
- Provide a systematic means to monitor learners 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 relevant 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.

5. Safeguarding Terminology

Safeguarding and promoting the welfare of children is defined (Department for Education (2025). *Keeping Children Safe in Education 2025*. [GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/101321/Keeping_Children_Safe_in_Education_2025.pdf)) as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical 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

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, 2023, 2024 and 2025)

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 learners 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 learners 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.

6. Roles and Responsibilities

ALL adults at the BSN will:

- Have responsibility for safeguarding learners 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, Headteachers 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 Safeguarding) 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 Executive Leadership Team (ELT) on matters of strategic safeguarding policy and process and ensure safeguarding is a regular agenda item at ELT meetings.

Chief Executive Officer (CEO) at the BSN will:

- Hold Headteachers, including the designated Executive Leadership Team 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 Executive Leadership Team for Safeguarding at the BSN will:

- The designated member of the ELT DELT for Safeguarding 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 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 Safeguarding and the ELT 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.



Director of Human Resources 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 Director of HR is the DSL then the DELT for Safeguarding will hold the Director of HR 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 training and face to face safeguarding inductions - including up to date training of all new staff in 'Internet / AI/ Online Safety'.
- Ensure that Single Central Record requirements for all paid staff are consistently met across the organisation.
- Ensure that Single Central Record requirements for all contractors, external to the 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/ Executive Leadership Team 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 Record 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 learners 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 regarding all suspicions of children at risk
- 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 / AI/ 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 learners and becoming a 'telling and listening school'. This includes ensuring that all disclosures are taken seriously.
- As the BSN safeguarding team annually reviewing the safeguarding and child protection policy 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 learner 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 learner 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.

7. Health and Safe Relationships between Adults and Children

The BSN is committed to fostering relationships that are respectful, supportive, and protective of children's wellbeing. Healthy relationships are characterized by trust, clear professional boundaries, and positive role modeling. Adults must always act in the best interests of the child, ensuring that interactions are appropriate, transparent, and never exploitative.

Acceptable Behaviours:

Treating all children with dignity and respect.

Using age-appropriate language and tone.

Offering encouragement and support without favoritism.

Maintaining professional boundaries in all settings, including online communication.

Physical contact only when necessary for care, comfort, or safety, and always proportionate and appropriate.

Unacceptable Behaviours:

Engaging in any form of secrecy or favoritism.

Using language or actions that could humiliate, belittle, or intimidate.

Physical contact that is unnecessary, prolonged, or could be misinterpreted.

Developing personal relationships outside the professional context.

Communicating privately with children in ways that bypass school safeguarding procedures.

8. 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, including in their use of online platforms, 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 attendance concerns and 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, and online content

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

- Child on child abuse (see Appendix 4)
- Child Sexual Exploitation (CSE) (see Appendix 7)
- 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 8)
- Maintaining positive mental health (see Appendix 9)
- Serious violence, even as a spectator
- Gender equality
- AI/online safety

9. 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:

- Learner self-esteem, mental health and wellbeing
- Aspects of risk and managing risk
- Self-protection strategies
- Developing knowledge of boundaries between appropriate and inappropriate behaviours
- Health care, hygiene and diet
- Non-abusive behaviour between learners
- Confidentiality and privacy awareness
- Opportunities for children to make anonymous or confidential reports of issues causing them concern
- Online and internet safety including use of generative AI
- Relationships and Sexual Education (RSE)
- Dutch law including legal ages of consent; alcohol consumption and drug use
- Values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs



10. 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, including where they see, hear or experience its effects.

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, 2025) (KCSiE 2025)**

All staff should be aware of the indicators of abuse, neglect and exploitation, understanding that children can be at risk from harm inside and outside school; inside and outside of the house, and online.

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 and exploitation. 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 2025)**

In all cases if staff are unsure, they should always speak to one of the BSN's DSLs.

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 2025)**

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. That 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 2025)**

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 2025)**

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 2025)**

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. It is important to be aware that children are often unseen victims of Domestic Abuse **KCSiE 2025**).

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)

11. 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 currently suffering harm; are in a position where they are likely to suffer harm; or are in immediate danger.

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
- Using bullying behaviour towards other children or being bullied
- Displaying 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, or possible 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.

Further information on attendance and lateness can be found in the BSN Attendance and Lateness Policy.

12. 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)**

In the Netherlands a child is considered in need when their physical, psychological, or social development is threatened, and parents or guardians cannot adequately address these issues.

Jeugdwet

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 2023)**

At the BSN, we highlight any observed or perceived welfare concerns to the DSLs verbally and through the use of CPOMS. These welfare concerns may include, but are not limited to, the areas of abuse as stated in this policy; severe academic pressure; concerns regarding eating issues; problematic domestic living arrangements and mental health issues.

All staff are expected to identify and intervene when a child may benefit from early help, analysing a learner's situation to provide support in school if needed.

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

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

- Follow the Meld Code
- Record concerns on CPOMS
- Liaise and meet with relevant staff 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 and liaise with 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).

13. 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 (DSL) 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 learners 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, or DSL from another site, 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 2).
- 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).

14. Peer Produced Sexual Images (Sexting)

'Sexting' (also referred to as 'youth-produced sexual imagery') means the creation, request, receipt, possession or sharing of nudes or semi-nudes (photos, videos or live streams) by, of, or among people under 18. This includes images created with apps/filters, screen-captures, or AI-generated/deepfake content that depicts a minor. The creation, possession or distribution of sexual images of a minor is illegal regardless of consent. For detailed guidelines on managing incidents of peer produced sexual images see Appendix 16.

15. Radicalisation and Extremism

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 2025)

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 learners safe from extremist material when accessing the internet in our school by using effective filtering and usage policies.
- 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 learners. We encourage learners 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 learners, 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 learner may be at risk of radicalisation or involvement in terrorism, will speak to the DSL. They should then follow normal safeguarding procedures.

For more BSN Guidelines on recognizing radicalization and extremism see Appendix 5

16. 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) 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 treated in 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 Executive Leadership Team 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 conducts the following criminal record and identity checks and, if applicable, teachers' status checks. If necessary, a risk assessment and extra measures will be taken.

*International Child Protection Certificate (ICPC) - Includes a criminal records check (every country the applicant has lived in over the last 5 years) - for candidates who 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 a digital copy of the original documents.

The BSN holds a Single Central Record (SCR) linked to 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 learners. (See Appendix 13 Guidelines for Volunteer).

Guidelines for Contractors on site

Refer to BSN Visitors Policy

The Head of Operations, 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 for working with children.

For visiting contractors, unless relevant security checks have been carried out, they must be always accompanied by a nominated employee and have no unsupervised access to learners, 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.



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 12)

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

No volunteer should be with a learner 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 learners 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 lanyard. A VOG Declaration will be needed for all adults who are involved in:

- Accompanying learners overnight on residential trips (overnight is defined as being with the learners between 2am - 6am)
- Regular activities where they are working independently with learners 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, learners and volunteers during normal school activities.

Lanyards

Lanyards will be worn by all adults at all times when working or visiting the school. These are categorised in the following colours:

SSV staff – dark blue

SSL staff – dark blue

JSV staff – purple

JSL staff – pink

Central Service staff – dark blue

Visitors/contractors with no VOG – red

Visitors (including Fam' Association)/contractors/third party Staff with a VOG – orange

Governors – yellow



6th Form learners - green

17. 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 Whistleblowing policy.

All staff and volunteers are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all learners 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.

Low-Level Concerns

A low-level concern is any concern that an adult working in the school may have acted in a way that is inconsistent with the school's Staff Code of Conduct (including inappropriate conduct inside or outside of work) but does not meet the harm threshold for referral to outside agencies such as the Police or Veilig Thuis. All BSN staff, volunteers and governors have a duty and responsibility to report any concern, however minor and including 'nagging doubts' following the BSN Low-Level Concerns Procedure, using CPOMS StaffSafe. The behavioural incident may not meet the threshold for serious harm but could indicate a pattern of risk over time. Self-reporting is encouraged if a staff member, governor or volunteer feels their actions may be misinterpreted. All contractors and visitors should be made aware of their duty and responsibility to report any safeguarding concerns as part of their welcome onto all BSN sites.

Headteachers, Deputy Headteachers and Designated Safeguarding Leads should oversee all safeguarding concerns reported about adults, including Low-Level Concerns, on their campuses. For Central Services, the Chief Executive Officer, Chief Human Resources Officer and the Central Services Designated Safeguarding Lead should carry out this function. These leaders have a duty to ensure all concerns are investigated, evaluated and acted upon appropriately and in line with BSN



Procedures. Accurate records must be maintained throughout these processes. Details of the process for Low-level concerns are on appendix 15.

18. 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.

19. 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.

20. 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.



21. Use of Cameras

BSN learners 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 learners are not permitted to use their own mobile phones or cameras, 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.

22. 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, who will receive training from the Central Services DSL. In addition, the DSL's on each site will facilitate school specific safeguarding training to continue to focus awareness on safeguarding protocols and issues.

New staff, at the point of contract, will be issued with an EduCare login by HR on-boarding services and there is an expectation that all new 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 2025) 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 in liaison with the PD Academy 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 on each campus. The storage of training records and requests are centralised through the Safeguarding Committee.

23. Use of Reasonable Force

The BSN recognises that in certain circumstances it may be necessary to have personal contact, in order to fully support and protect our learners. In the Netherlands school staff may only physically intervene with force in urgent, dangerous situations to prevent immediate harm or danger (e.g., to safeguard a learner or others). The decision to use force, and how much, is down to the professional judgement of the staff member concerned, depending on the individual circumstances, including the learner's age and any special needs or disabilities. Such intervention must meet the following key principles:

- Proportional: no more force than absolutely necessary
- Last resort: only when no safer option is available



- Not a Punishment: It is always unlawful to use force as a punishment or to intentionally cause pain, injury, or humiliation.

When Force May Be Used

Force is generally used in two main scenarios: to control or to restrain. It can be applied in various circumstances, including:

- To prevent a learner from committing a criminal offence, injuring themselves or others, or damaging property.
- To remove disruptive learners from a classroom when they have refused a verbal instruction to leave.
- To stop a fight between learners.
- To prevent a learner from leaving a room or school premises if doing so would risk their safety or cause significant disruption.
- To search for prohibited items (e.g., weapons, illegal drugs)

Unacceptable Uses of Force

Staff must never use force in a way that is likely to cause injury or be considered indecent. Prohibited methods include:

- Holds that restrict breathing, such as pressure to the neck, rib cage, or abdomen.
- Covering a learner's mouth and/or nose.
- Deliberately restraining a person in a face-down (prone) position on the ground.
- Kicking, slapping, punching, or using any implement.

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,

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 learners. 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 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.



24. Site Security and Visitors

The BSN takes the security of our learners and staff very seriously and fosters a culture of awareness amongst all stakeholders. School gates are locked and monitored during the day, in addition, a closed circuit monitoring system is in operation.

All visitors are expected to observe the BSN Visitors Policy, which specifies the BSN safeguarding House Rules 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 in using the Inventory system 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 and 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' lanyard. These visitors must 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 Record (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 and lanyard and be allowed to enter the school. Contractors without a VOG **must be accompanied** by a member of BSN staff at all times, whilst in the building or school grounds.

Ex-employees will be expected to enter each site via the main entrance and sign in at reception. They **must be accompanied** by a member of BSN staff at all times, whilst in the building or school grounds.

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 learners. 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.

25. Visiting Speakers

Refer to BSN Visitor Policy and also see Appendix 11 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 11. 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 learners unless they have the relevant confirmed school and police checks (as per section 20 above)
- Visiting speakers should understand that their presentation will be brought to an early end if the content proves unsuitable.

26. 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 learner 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.



27. Concerns and Complaints

Scenario 1

A child or parent raises a concern about poor practice towards a child, but the issue does not meet the threshold for safeguarding or child protection action. In this case, the concern will be managed under the BSN Complaints Policy and the BSN Staff Conduct Improvement and Disciplinary Procedures.

Scenario 2

A child or parent raises a concern about poor practice towards a child, and the issue does meet the threshold for safeguarding or child protection action.

If the complaint concerns the headteacher, it will be forwarded to the CEO, who will investigate and make decisions.

If the complaint concerns the DSL, it will be managed by the headteacher in cooperation with the Head of the BSN Safeguarding Group.

If the complaint concerns a Deputy DSL, it will be managed by the DSL in cooperation with the headteacher.

If the complaint concerns a staff member who is not a DSL or Deputy DSL, it will be managed by the DSL in cooperation with the headteacher, who will be involved in the process from the outset.

Scenario 3

A child or parent raises a concern about how a safeguarding matter has been handled.

If the complaint concerns a Deputy DSL, it will be investigated by the DSL. The headteacher will be notified when the complaint is made and will take part in the decision making process.

If the complaint concerns the DSL, it will be investigated by the Head of the BSN Safeguarding Group. The headteacher will be notified when the complaint is made and will take part in the decision making process.

If the complaint concerns the Head of the BSN Safeguarding Group, it will be investigated by the BSN CEO. If the Head of the Safeguarding Group is not a headteacher, the headteacher of their school will be notified when the complaint is made and will take part in the decision making process.

28. 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 BSN 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 Record 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.



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 Kinderbescherming	Child Protection Law
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 & Gezin (CJG)	Is the local municipalities' Youth and Family Centre



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 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:

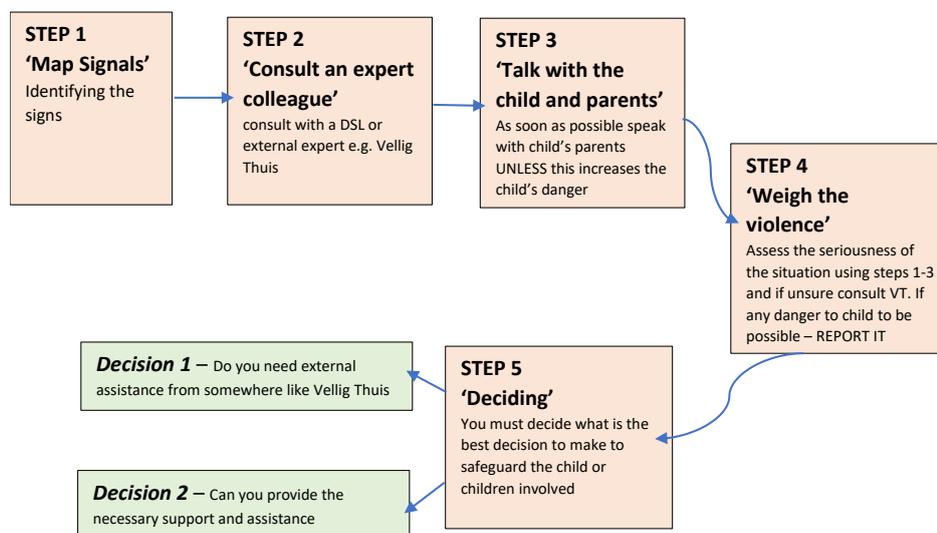
Wet op de Jeugdzorg, 2005 (NL Youth Care Act)
Keeping Children Safe in Education (UK Department for Education, 2025)
Ministrie van Justitie en Veiligheid (Ministry for Justice and Safety)
Department of Education, UK
Children's Act, UK Government,
NL Government, 2013,
Revised Prevent Duty Guidance for England and Wales 2021
NSPCC Learning 2022,23, 24 & 25
Working Together to Safeguard children, HM Government UK , 2018
UK Equality Act 2010
The 2021 UK Domestic Abuse Act



Appendix 2

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 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 3

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.	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. 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.
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.

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 4

Specific Safeguarding Issues – Child on child (Peer on peer) abuse

Referring 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 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

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 learners to come forward to report it. **(KCSiE 2025)**

Child on child 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, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- 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
- Causing someone to engage in sexual activity without consent
- 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.
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- 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.
- 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 2025)**



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 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 learners.

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 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. See Appendix 16 for Guidelines on managing incidents of peer produced sexual images.



Appendix 5

BSN Guidelines Recognising Risks and Vulnerabilities of Extremism and Radicalisation

Definitions

Extremism (NL, 2024–2029): ideologies or activities — violent or non-violent — that undermine the democratic legal order and social cohesion, requiring an ideology-neutral, multi-agency approach across local partners and the online domain.

Terrorism (NL, 2024–2025): ideologically motivated violence intended to intimidate society or damage democratic structures; current assessments flag a ‘substantial’ threat level (4), lone-actor risks, and rapid online radicalisation among youth.

National Counterterrorism Strategy 2022–2026 and the National Extremism Strategy 2024–2029 (Netherlands).

Radicalisation (2024–2025) remains a process, increasingly occurring online, often with mixed or grievance-based ideologies (e.g., blends of extremist narratives rather than a single coherent doctrine).

Introduction

Children and young people can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include exposure through the influence of family members or friends, and/or direct contact with extremist groups and organisations or, increasingly, through the internet.

Most individuals, even those who hold radical views, do not become involved in extremism. Numerous factors can contribute to and influence the range of behaviours that are defined as extremism. It is important to consider these factors in order to develop an understanding of the issue. It is also necessary to understand the factors that build resilience and protect individuals from engaging in violent extremist activity.

People who are in the process of being radicalised may become involved with a new group of friends, search for answers to questions about identity, faith and belonging, possess extremist literature or advocate violent actions, change their behaviour and language, or may seek to recruit others to an extremist ideology.

It is important to note that learners experiencing these situations or displaying these behaviours are not necessarily showing signs of being radicalised. There could be many other reasons for the behaviour including alcohol or drug abuse, family breakdown, domestic abuse, bullying, etc., or even something less worrying.



It is important to be cautious in assessing these factors to avoid inappropriately labelling or stigmatising individuals because they possess a characteristic that fits a specific profile. It is vital that all professionals who have contact with vulnerable individuals are able to recognise those vulnerabilities and help to increase safe choices.

The risk of radicalisation is the product of a number of factors and identifying this risk requires that practitioners exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified.

Some learners may be at risk due to living with or being in direct contact with known extremists. Such learners may be identified by the police.

Vulnerability and Risk Indicators

Please note that the following lists are not exhaustive and all or none may be present in individual cases of concern, nor does it mean that vulnerable children experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism. Oversimplified assessments based upon demographics and poverty indicators have consistently proven to increase victimisation, fail to identify vulnerabilities and, in some cases, increase the ability of extremists to exploit, operate and recruit.

There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. The following indicators have been provided to support professionals to understand and identify factors that may suggest a child, learner or their family may be vulnerable to or be involved with extremism.

Vulnerability

Identity Crisis - Distance from cultural/religious heritage and uncomfortable with their place in the society around them.

Personal Crisis – Family tensions, sense of isolation, adolescence, low self-esteem, disassociating from existing friendship group and becoming involved with a new and different group of friends, and searching for answers to questions about identity, faith and belonging.

Personal Circumstances – Migration, local community tensions, events affecting country or region of origin, alienation from democratic legal-order values (Netherlands), and having a sense of grievance that is triggered by personal experience of racism or discrimination.

Un-met Aspirations – Perceptions of injustice, feeling of failure, and rejection of civic life.

Criminality – Experiences of imprisonment, poor resettlement/reintegration, and previous involvement with criminal groups.

Digital vulnerability – High exposure to extremist content, algorithmic echo-chambers, and rapid online identity shifts in closed or pseudonymous communities.



Access to extremism/extremist influences

- Is there reason to believe that the learner associates with those known to be involved in extremism either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate (for example, the learner is a friend or family member of someone believed to be linked with extremist activity)?
- Is there evidence that the learner accesses online extremist ecosystems (e.g., encrypted messaging/apps, invite-only chat servers, cross-platform channels), shares extremist propaganda or AI-generated content, or uses operational security (VPNs, burner accounts) to avoid oversight?
- Is there reason to believe the learner seeks in-person meetups linked to online extremist networks or attempts to acquire materials, manuals or weapons-related information aligned with extremist narratives?
- Is the learner known to have possessed or is actively seeking to possess and/or distribute extremist literature/other media material that is likely to incite racial/religious hatred or acts of violence?
- Does the learner sympathise with or support illegal/illicit groups, for example, propaganda distribution, fundraising and attendance at meetings?
- Does the learner support groups with links to extremist activity?

Experiences, Behaviours and Influences

- Has the learner encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the learner?
- Have international events in areas of conflict and civil unrest had a personal impact on the learner resulting in a noticeable change in behaviour?
- Has there been a significant shift in the learner's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the learner come into conflict with family over religious beliefs, lifestyle or dress choices?
- Does the learner vocally support terrorist attacks, either verbally or in their written work?
- Has the learner witnessed or been the perpetrator/victim of racial or religious hate crime or sectarianism?
- Rapid online engagement indicators: increased time in extremist forums/servers, sharing manifestos/memes that glorify violence, or adopting mixed, unstable ideologies

Travel

- Has the learner travelled for extended periods of time to international locations, including the UK, which are known to be associated with extremism?
- Has the learner employed any methods to disguise their true identity? Has the learner used documents or cover to support this?
- Note: while overseas travel remains a consideration, current risks often manifest without travel, via domestic lone-actor radicalisation fostered online.

Social Factors

- Does the learner have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the learner display a lack of affinity or understanding for others, or experience social isolation from peer groups?



- Does the learner demonstrate identity conflict and confusion normally associated with youth development?
- Does the learner have any learning difficulties or mental health support needs?
- Does the learner demonstrate a simplistic or flawed understanding of religion or politics?
- Does the learner have a history of crime, including episodes in prison?
- Is the learner a foreign national, refugee or awaiting a decision on their immigration/national status?
- Does the learner have insecure, conflicted or absent family relationships?
- Has the learner experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the learner's life has extremist view or sympathies?
- Psychosocial/clinical factors: increased risk where youth present with psychiatric or psychosocial problems coupled with online radicalisation in right-wing extremist networks.

More critical risk factors could include:

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance and/or behaviour
- Immersion in cross-platform extremist ecosystems (multiple overlapping chat groups).
- Accelerationist or lone-actor patterns: secrecy, weapons interest, doxing/intimidation, endorsement of 'violence for its own sake'.

Responding to Concerns

- Early identification of concerns or support required for a learner should result in responses being made through the BSN Safeguarding and Child Protection reporting procedures.
- The Designated Safeguarding Lead will inform the Veilig Thuis team and await instruction on how to proceed.
- Some concerns which are identified may have a security dimension to them. For this reason, it is important that liaison between the DSL, Headteacher, BSN Head of Security and CEO is an early part of all investigations.

Education

The BSN endeavours to safeguard children and young people from radicalisation through the PSHE and Life Skills curriculum. The fundamental values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths, cultures and beliefs will be addressed.

In all years, there is an age appropriate focus on:

- Building self-esteem, healthy coping mechanisms and resilience
- Respect and tolerance
- Developing a sense of community belonging



- Digital literacy: recognising disinformation, algorithmic amplification, and how extremist content circulates online
- Critical thinking about mixed ideologies and grievance narratives
- Theme awareness: combating antisemitism, misogyny, anti-LGBTQ+ hostility, and anti-‘woke’ narratives used by extremists

Terrorism topic in Y10 covers:

Historical incidents showing its universality

Root causes

Age appropriate responses to worldwide critical incidents will:

- Provide a balanced view of the incident to reduce the impact of alternative facts and misinformation
- Provide a safe and accepting forum for learners to discuss their fears and be pointed in the right direction if further help is needed
- Encourage verification using trusted sources and discourage sharing unverified content that may contain extremist propaganda.

References

National Extremism Strategy 2024–2029 (Netherlands) — Government.nl: ‘Promote, Protect, Combat’ (May 17, 2024).

NCTV Terrorist Threat Assessments (2024–2025) — threat level, lone-actor risks, youth online radicalisation.

National Counterterrorism Strategy 2022–2026 (Netherlands) — EU Knowledge Hub summary.

UK Government Prevent Duty Guidance (updated 2023) — Department for Education.

Prevent and Channel factsheet (2024) — Home Office (Dec 5, 2024).

Independent Review of Prevent — One year on (2024) — Home Office.

Recent school Prevent policies (2024–2025) for practical examples (e.g., Link School Prevent Policy, Sept 2024/2025).



Appendix 6

Specific Safeguarding Issues - Children Missing Education (CME)

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

When learners leave the school, the BSN will endeavour to make contact with the learner'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 learner'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 goes missing education. This also supports the school in making immediate contact if issues are 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, to reduce the risk of abuse, neglect or exploitation; and reduce the risks of their going missing in the future. We will also 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 7

Specific Safeguarding Issues - Child Sexual Exploitation

Much of this appendix is referenced closely from 'Keeping Children Safe in Education' (UK Department for Education, 2025)

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. Like other forms of sexual abuse, this abuse may involve either physical contact or non-contact activities. Such non-contact activities may include forcing children to look at sexual images; encouraging them to behave in sexually inappropriate ways or grooming them via the internet.

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 RSE 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 any related CSE 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 often happening at times, without the child's immediate knowledge for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship.

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



Appendix 8

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 9

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 learner body. We pursue this aim using whole school approaches, and specialised, targeted approaches aimed at vulnerable learners. 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, 2025)

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 learner 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 learner 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 learner 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 at the Senior Schools, Health Care Teams, AEN Departments 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 learner 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 learners to keep themselves and others physically and mentally healthy and safe are included as part of our developmental Life Skills/Tutor Time, PSHE and Mental Health and Wellbeing curriculums. There is an emphasis on enabling learners 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 10

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 11

Agreement for Visiting Speakers to the BSN

Thank you for agreeing to speak to BSN learners. The safety of our learners 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 learners.

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 learners without prior permission and as overseen by BSN staff.
- I agree not to go anywhere unsupervised with any learners.
- I agree not to exchange private details such as telephone numbers, email addresses or social media identities with learners unless previously agreed with the Headteacher or SLT member.
- 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 learners, my talk will be brought to an early end, and my visitor status will be revoked.

Signed: _____

Date: _____



Appendix 12

Agreement and Guidelines for Regulated Volunteers to the BSN

Also refer to BSN Volunteers Policy – the summary below covers the key safeguarding points of the [BSN Volunteers Policy](#).

Purpose and Duty of Care

The school welcomes volunteers but places learner safety, wellbeing, and safeguarding at the centre of all activity. The BSN has a legal duty of care to protect learners from harm, abuse, inappropriate influence and any safeguarding risk. Volunteers must comply fully with policy expectations to support this duty.

Approval and Expectations

All volunteer offers must be approved by a Senior Leadership Team member. Volunteers are treated as visitors and must follow the [BSN Visitors Policy](#).

Volunteers must read and sign the volunteer agreement before starting (copy from the BSN Volunteers Policy, below); the school keeps this on file.

Safeguarding and Supervision

Learners view volunteers as safe adults, so standards must be high. Regulated activity is defined as six or more visits in a year or three within one month. Volunteers must not work one to one with learners without supervision unless background checks (such as VOG or DBS) and induction are complete. Even with checks in place, one to one situations should be limited and take place in open, visible areas. All volunteers must receive safeguarding and child protection training.

Confidentiality and Conduct

Volunteers must keep all learner information confidential and must not share it outside school, including with other parents. They should uphold the school's ethos, treat learners respectfully and understand and follow emergency evacuation procedures.

Check-in and Identification

Volunteers must report to reception on arrival and wear a volunteer badge or lanyard at all times.

Background Checks (VOG / ICPC)

A new VOG or ICPC is required for volunteers who:

- work unsupervised in regulated activity
- join overnight residential trips
- volunteer regularly (more than six times a year or three times in a month)



A new VOG is required after any absence of more than six months. Individual BSN schools will keep an overview of volunteer schedules. Volunteers and their background checks will be recorded on the Single Central Record.

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:

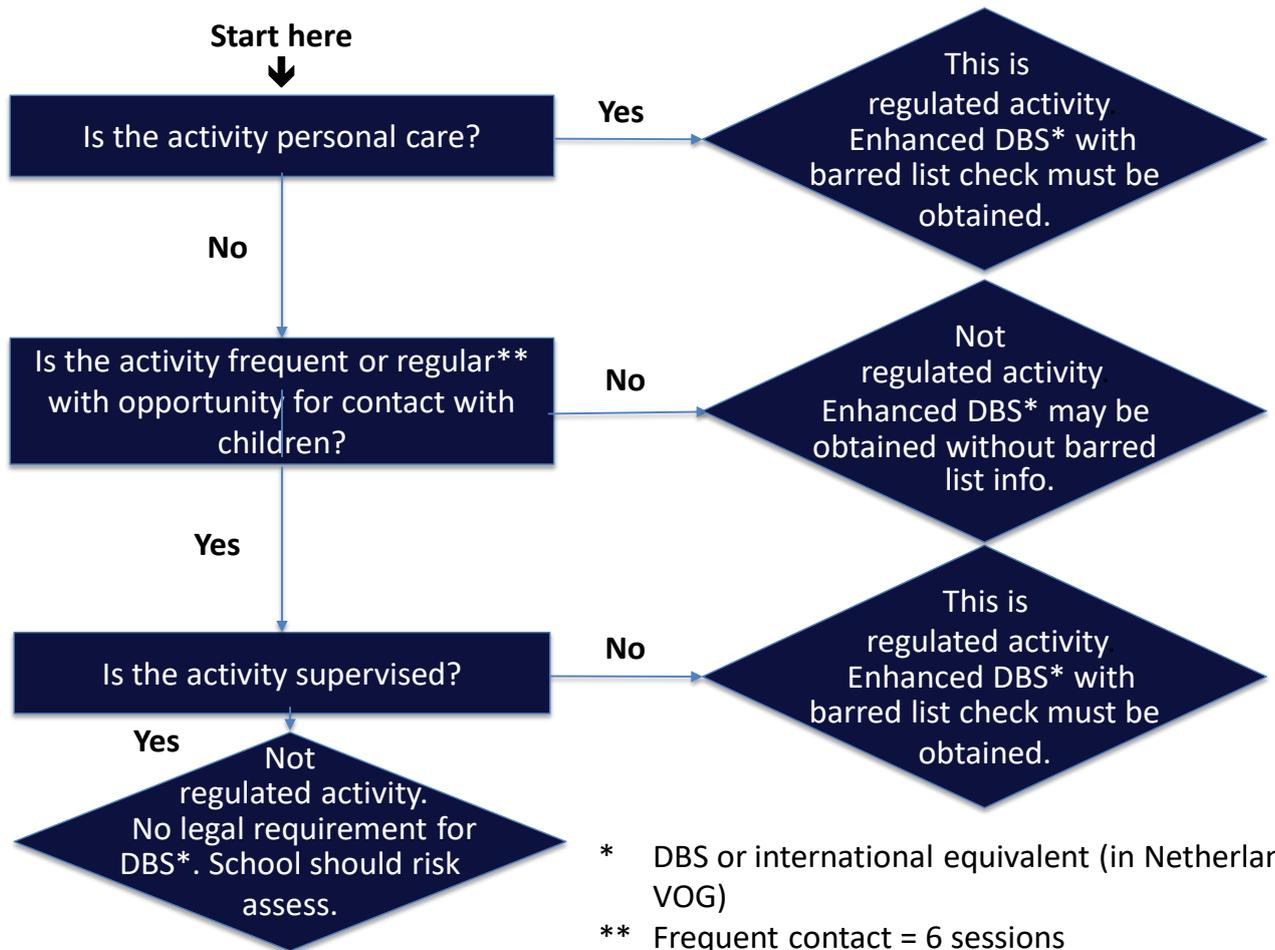
Name:

Date:



Appendix 13

Flow Chart for Identifying Voluntary Regulated Activity





Appendix 14

Single Central Record (SCR) - Maintenance and Audit Procedure

The SCR is a single, secure record that confirms schools have carried out all required pre-employment vetting checks on staff, governors, volunteers, and contractors. It is a record that checks were properly carried out and evidence of compliance with Safer Recruitment guidelines and ongoing safeguarding training. This means that items such as scan of documents should not be stored as part of the SCR. Maintaining an accurate SCR demonstrates that roles are staffed by properly vetted adults—a cornerstone of school safeguarding.

The SCR for the BSN is securely stored on the CPOMS StaffSafe platform.

Who must the SCR must include?

- All employees (we divide into Teaching, LSA, Support, and Music)
- Governors
- Volunteers who visit regularly (more than 5 times a year)
- Third Party Staff (individual contractors, e.g. CCA providers)
- External Contractors (Companies providing a Letter of Assurance (e.g. the Catering Company))

What Checks Are Recorded?

Each staff member listed on the SCR must have evidence of the following checks. All checks should be recorded with dates and the name of the person who checked the documentation.

- Identity Checks (including verification of photographic ID)
- Role-related Checks (including qualifications and CV gap checks)
- Police Checks
- Reference Checks
- Safeguarding Training Checks (recording attendance at annual training)
- For Governors, Volunteers and Third-Party Staff
- Identity Checks (including verification of photographic ID)
- Police Checks
- Safeguarding Training Checks (recording attendance at annual training)
- For external Contractor Companies, a record of the confirmation that the contractor has carried out these checks must be stored. The Letter of Assurance should also clarify who is responsible for the safeguarding training of staff who are onsite regularly.

Roles and responsibilities – maintenance and audit monitoring

The CEO has ultimate responsibility across the BSN as a whole for ensuring the SCR is accurate, complete, and up to date. The Chair of Governors shares this accountability by monitoring that effective systems are in place for safer recruitment and record-keeping.

The Director of HR has overall responsibility for maintaining and updating the SCR, ensuring day-to-day accuracy. The Director of HR should also ensure that a termly audit, including spot checks of



personnel files is completed and reported to the ELT. Headteachers and campus Designated Safeguarding Leads have responsibility for liaising with the Director of HR to ensure the accuracy of the areas of the SCR related to their individual campuses.

The Director of HR and the Safeguarding Governor have responsibility for completing a termly audit of the whole school SCR and report to the ELT and the Board of Governors.)

Designated Safeguarding Leads should conduct monthly 'health check' audits of their campus portions of the SCR to review for missing entries or new starters. There should also be a half termly audit including spot-checks of personnel files.

Maintaining consistent audit evidence and improvement records demonstrates robust governance and transparency. The SCR, and records of these audits of it, should be available on request to ensure compliance and readiness for inspections.

Single Central Record (SCR) - Audit checklist

The audit should be in two stages. First, checking that the SCR itself is complete and that all required checks are completed and comply with safeguarding best practice and GDPR. Secondly, spot checking to verify that the information recorded on the Single Central Record matches the actual documentation held in staff files. These two steps provide assurance that the SCR isn't just "filled in," but is backed by real evidence—critical for safeguarding compliance and inspection readiness.

The Spot Checks are of an agreed sample size (e.g. 5% of work force or 6 files) and include a mix of roles (teachers, support, LSA, music, governors, volunteers, third-party staff, contractor) and a mix of recent starters and longer standing staff.

Any discrepancies must be noted and reported, and actions put in place to rectify with the person accountable and an agreed timeline.

Checklist items

AUDIT CHECKLIST			
GENERAL COMPLIANCE			
Check	Person	Date	Notes
SCR includes all required personnel (staff, governors, volunteers, Third Party Staff, and contractors (companies))			
Roles and start dates are clearly recorded.			
Mandatory Checks are completed in the SCR			
Check	Person	Date	Notes



Identity verified (photo ID checked)			
Section 128 check for leadership roles (where applicable)			
Prohibition from teaching check completed (where applicable)			
Qualifications verified (inc. Teacher Reference number).			
Other checks			
Check	Person	Date	Notes
Safeguarding training date recorded.			
References verified and documented.			
Contractor compliance confirmed.			
Data Integrity			
Check	Person	Date	Notes
Dates of checks recorded accurately.			
Name of person completing checks recorded.			
No blank fields without explanation.			
Archived leavers separated from current staff.			
GDPR & Security			
Check	Person	Date	Notes
SCR stored securely.			
Access restricted to authorised personnel.			
Data retention protocols are adhered to.			
Spot checks process			
Check	Person	Date	Notes
Select the sample			



Compare SCR entries with personnel files for the sample.			
Confirm check dates.			
Check for missing or expired entries (including Section 128 checks for managers and governors)			

Actions agreed

Action	Person responsible	Deadline	Notes

Audit Team Notes



Appendix 15

Managing Low-Level Safeguarding Concerns Procedure

Introduction

Effective safeguarding of the children and young people in our care is the paramount responsibility of all members of the BSN community. To support this aim, we are committed to maintaining a culture of openness, trust, and transparency where all safeguarding concerns, including those deemed low-level, are identified, reported, and addressed promptly. This procedure supports early intervention and promotes a safe environment for learners and staff.

Defining Low-Level Safeguarding Concerns

A low-level concern is any concern that an adult working in the school may have acted in a way that is inconsistent with the school's [Staff Code of Conduct](#) (including inappropriate conduct inside or outside of work) but does not meet the harm threshold for referral to outside agencies such as the Police or Veilig Thuis.

Low-level concerns may include, but are not limited to:

Over-familiarity with learners:

- Frequently seeking out individual learners for personal conversations
- Offering special treatment or gifts without a clear educational purpose

Boundary-blurring behaviour:

- Socialising with learners outside of school settings without parental or school approval
- Making personal comments about a learner's appearance or relationships
- Inappropriate communication:
- Using personal devices or social media to contact learners
- Sending messages that are overly friendly, ambiguous, or could be misinterpreted

Physical contact:

- Unnecessary or prolonged physical contact not in line with school policy
- Sitting too close to others or invading personal space

Behavioural inconsistencies:

- Using language or humour that could be considered inappropriate or unprofessional
- Failing to challenge inappropriate learner behaviour or comments
- Overly aggressive behaviours such as shouting at learners

Unusual favouritism:

- Regularly selecting the same learner for tasks, privileges, or praise
- Defending a learner's behaviour disproportionately

Lack of transparency:

- Spending time alone with learners in areas not visible to others



- Not reporting safeguarding concerns (including Low-Level Concerns)

Roles and Responsibilities

All BSN staff, volunteers and governors have a duty and responsibility to report any concern, however minor and including 'nagging doubts' via CPOMS StaffSafe. The behavioural incident may not meet the threshold for serious harm but could indicate a pattern of risk over time. Self-reporting is encouraged if a staff member, governor or volunteer feels their actions may be misinterpreted.

All contractors and visitors should be made aware of their duty and responsibility to report any safeguarding concerns as part of their welcome onto all BSN sites.

Headteachers, Deputy Headteachers and Designated Safeguarding Leads should oversee all safeguarding concerns reported via StaffSafe, including Low-Level Concerns, on their campuses. For Central Services, the Chief Executive Officer, Chief Human Resources Officer and the Central Services Designated Safeguarding Lead should carry out this function. These leaders have a duty to ensure all concerns are investigated, evaluated and acted upon appropriately, ensuring that accurate records are maintained.

Low-Level Concerns Reporting Process and Procedures

Who can report?

All members of staff and governors will have StaffSafe accounts and have a duty to directly report any concern—no matter how minor—about a colleague's behaviour. Self-reporting is encouraged if a staff member or governor feels their actions may be misinterpreted. The protections of reporting persons will be consistent with [BSN Confidential Reporting \(Whistleblowing\) Policy](#).

Volunteers, contractors, or visitors who observe concerning behaviour should report their concerns immediately to any member of staff, but preferably a Senior Leader or Member of the Safeguarding Team.

How to Report – Logging a *Confidential Note* in CPOMS StaffSafe

All staff and governors must have login credentials for StaffSafe in order to use this tool to log the concern. Concerns related to staff and volunteers, including more general wellbeing concerns, can only be logged as 'Cause for concern' or 'Wellbeing'. A general rule to follow is that if you think it could be worth reporting, then it always is so, if unsure whether the behaviour or incident qualifies as a "low-level concern", the report should always be completed. However, in circumstances when the disclosure or incident is felt to need immediate action the DSL, Headteacher, Head of HR or Senior Leader in charge of the school should also be spoken to face to face.

Once logged in, they should select the individual about whom they wish to raise the concern, choose a category (Cause for Concern or Wellbeing) and report the reason for the concern. The report should provide a factual, objective description of the incident or behaviour, including time, date, location and any witnesses if applicable.



If you feel unable to raise the concern on campuses or at Central Services due to the seriousness and/or sensitivity of the issues involved, or if you believe that members of these teams may be involved, you may speak either to the CEO, Chair of Governors or another governor. Alternatively, you may report your concern to a confidential advisor (vertrouwenpersoon) either in writing, verbally by telephone or – upon request – within a reasonable period in a face-to-face conversation at an agreed location. The confidential advisor will inform about the options available for informal and/or formal procedures in raising concerns to the organisation. They can support in submitting a written report.

Confidentiality and Support for Reporting Persons

All reports are treated with strict confidentiality. Staff will be supported throughout the process, including access to wellbeing resources and professional guidance. The BSN is committed to the highest possible standards of openness, probity and accountability and encourages early reporting and action.

What Happens Next

On campuses, the Headteacher, Deputy Headteacher and Designated Safeguarding Lead will evaluate the concern and determine the necessary actions in response to the report. At Central Services, the Head of HR/Designated Safeguarding Lead will perform these functions.

This evaluation will conclude if the incident or behaviour was appropriate conduct, a low-level concern or is to be escalated. Actions may include informal conversations and guidance, additional training, or escalation in line with the BSN Staff [Conduct Improvement Procedure](#) or [Disciplinary Procedure](#).

Staff involved in low-level concerns are supported through clear communication, access to wellbeing resources, and, as appropriate, opportunities for reflection and improvement.

Wherever possible, in line with GDPR requirements, the person reporting should receive some feedback on their disclosure to reassure that the matter has been treated seriously.

Record-keeping

All concerns are recorded securely in StaffSafe with date and time stamps. The CEO/Headteacher is responsible for ensuring accurate records of decisions, investigations and actions are maintained.



Appendix 16

Guidelines for Management of Incidents of Peer-Produced Sexual Images (Sexting)

Introduction

The BSN recognises the moral and statutory responsibility to act in the best interests of the child at all times through the provision of a safe and welcoming environment where all children are respected and valued.

Systems, training and safe practice are developed through adherence to the Dutch Meldcode Huiselijk Geweld en Kindermishandeling (five-step framework) and compliance with the Wet Seksuele Misdrijven (Sexual Offences Act) effective 1 July 2024

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

Definition

For the purposes of this guideline, 'sexting' (also referred to as 'youth-produced sexual imagery') means the creation, request, receipt, possession or sharing of nudes or semi-nudes (photos, videos or live streams) by, of, or among people under 18. This includes images created with apps/filters, screen-captures, or AI-generated/deepfake content that depicts a minor. The creation, possession or distribution of sexual images of a minor is illegal regardless of consent.

Scope of Incidents Covered

This guideline covers incidents in which:

- A person under 18 creates and shares sexual imagery of themselves with a peer under 18.
- A person under 18 shares sexual imagery created by another person under 18 with a peer under 18 or an adult.
- A person under 18 is in possession of sexual imagery created by another person under 18.

This guideline does not cover:

- Adult perpetrators sharing sexual imagery of under-18s (this is child sexual abuse and must always be reported to the police).
- Adult pornography shared by learners under 18 (addressed under behaviour/online safety policies), and sexual harassment or 'sexchatting' offences occurring online, which may constitute criminal behaviour under the Wet Seksuele Misdrijven and require police consultation.



The Law

Responding to youth-produced sexual imagery involves both safeguarding and legal considerations in the Netherlands and the UK.

Dutch Law

As of 1 July 2024, the Wet Seksuele Misdrijven (Sexual Offences Act) is in force. It strengthens protection against sexual violence and online sexual behaviour. Key points relevant to schools include:

- Sex must be voluntary; silence or lack of resistance is not consent.
- Sexual harassment (offline and online) is a criminal offence.
- Sexchatting and sexually explicit approaches to children under 16 are criminal offences; additional protections apply to 16–17-year-olds in vulnerable positions.
- Intimidating sexual advances on social media can be criminal behaviour.

Schools must not make determinations on criminal liability; where in doubt, consult the police or Veilig Thuis

UK Law & Guidance

In the UK, creating/sharing nudes of under-18s remains illegal. Schools should follow UKCIS guidance and understand police discretion to avoid over-criminalising children while safeguarding effectively.

Disclosure or Discovery of Sexting

Disclosures can be made to any trusted adult in school, via existing reporting routes, by peers or parents, or directly to police. All direct disclosures must be taken seriously; learners are often distressed and may have tried to resolve the issue themselves.

Staff Responsibility Checklist

- Report the incident or disclosure to the school DSL immediately.
- Never view, download or share the imagery yourself, or ask a learner to share or download it.
- If you have already viewed the imagery inadvertently, report this to the DSL.
- Do not delete the imagery or ask the learner to delete it (unless directed by the DSL as part of a managed response).
- Do not investigate by questioning learners about the imagery; this is the DSL's role.
- Do not share information beyond those who need to know (DSL/SLT).
- Do not blame or shame any learners involved.
- Explain you must report it and reassure that support will be provided.



Assessing the Risks

If police/Veilig Thuis referral is not immediately required, the DSL conducts a review and risk assessment, including interviews where appropriate.

- Why was the imagery created/shared? Any coercion, pressure or sextortion?
- Who has shared/received it? On which platforms? With/without the learner's knowledge?
- Any adult involvement?
- Impact on the learner(s) involved.
- Additional vulnerabilities (SEND, safeguarding history, care experience).
- Understanding of consent and healthy relationships.
- Prior similar incidents.

Managing a Sexting Incident

- Refer to the DSL as soon as possible.
- DSL holds an initial review with appropriate staff.
- Interview learners involved if appropriate.
- Inform parents early unless doing so places a learner at risk of harm.
- At any point, if there is concern a learner has been harmed or is at risk, make an immediate referral to Veilig Thuis or the police.

Reporting Incidents to the Police / Veilig Thuis

Make an immediate referral to the police and/or Veilig Thuis when:

- An adult is involved.
- There is suspected coercion, grooming, blackmail, sextortion or capacity to consent is in doubt.
- The content suggests activity not appropriate to developmental stage, or is violent/abusive.
- Any child in the imagery is under 13.
- There is immediate risk of harm (e.g., suicidality, self-harm).

Additionally, if a potential sexual offence by staff towards a minor is suspected, you must immediately inform the school board and consult the Vertrouwensinspecteur in line with the statutory meld-, overleg- en aangifteplicht (duty to report/consult/make a police report).

If devices must be seized, turn them off and secure them until collected by police. If none of the above apply, the school may manage the incident internally, escalating if new information emerges.

Initial Review Meeting (DSL)

- Immediate risks to any learner.
- Whether to refer to police/Veilig Thuis and/or consult the Vertrouwensinspecteur.
- Whether viewing is strictly necessary (normally it is not).
- Further information needed to decide on response.
- Extent of sharing; platforms/services involved.
- Immediate steps to support removal of content from devices/platforms.



- Relevant learner facts influencing risk.
- External contacts (other schools/individuals).
- Parent/guardian engagement plan (usually involve parents).

Interviewing Learners Involved

Conversations should be led by the DSL (or another trusted staff member if preferred by the learner) to establish facts without viewing imagery and to identify steps to prevent further distribution.

- Acknowledge pressures on young people and support parents to understand wider issues.
- Stay solution-focused; avoid 'why did you do this?' questions.
- Reassure learners they are not alone; the school will help.
- Discuss consent, trust and motivations; signpost to support.

Recording Incidents

Record all incidents in line with BSN Safeguarding and Child Protection policy, documenting risk assessment, decisions, times/dates, and rationale for referrals or non-referrals.

Informing Parents/Guardians

In line with the Meldcode five-step framework, involve parents/guardians early unless doing so presents a risk of harm. Where there is uncertainty, consult Veilig Thuis (Step 2 or 4). Decisions not to inform parents should usually be made with Veilig Thuis and/or police. Support learners to inform parents where appropriate.

Support for Parents/Guardians

Staff should listen to and validate parent concerns. Provide clear information about the law, platform reporting routes, and how to support their child without blame. Where appropriate, discuss healthy relationships, consent, and digital footprints.

Veilig Thuis Referrals

If Veilig Thuis is already involved with a learner, contact the case worker. Where thresholds are met following investigation, make a referral in line with BSN procedures.

Searching Devices, Viewing and Deleting Imagery

Staff should not view youth-produced sexual imagery unless strictly necessary to safeguard a child and only under DSL/Headteacher authority. Never copy, print or share images. If viewing is unavoidable (e.g., learner presents the image; found on a school device), ensure another staff



member is present (they do not need to view), record details, and provide support for any staff who have inadvertently viewed content.

Where other agencies are not involved, the DSL may instruct learners to delete imagery and confirm deletion across devices/platforms. Remind learners that possession of youth-produced sexual imagery is illegal and refusal to delete may result in police involvement. Document decisions and inform parents unless this increases risk.

Reporting Youth-Produced Sexual Imagery Online

Provide practical help to remove content quickly. Use in-app reporting, trusted flagger routes where available, and consider contacting providers' safety teams. Note that platforms' age-verification remains limited; encourage privacy settings, disabling downloads, and blocking/reporting senders. Support learners to preserve essential evidence (timestamps, URLs) while avoiding storing illegal images on school systems.

Prevention, Education and Emerging Risks

The curriculum and tutor time should address consent (including the 'active consent' standard), sextortion, grooming, deepfakes/AI-generated content, and bystander behaviours. Share clear guidance with parents on discussing nudes sexting, how to respond non-judgementally, and routes to support. Monitor local trends (e.g., scams targeting boys) and update education accordingly.

References (key sources consulted)

- Government of the Netherlands — New Sexual Offences Act effective 1 July 2024
- The Northern Times — Overview of Wet Seksuele Misdrijven changes (July 2024)
- UK Council for Internet Safety (UKCIS) — current guidance portal
- School & Veiligheid — Meldcode and Meldplicht (updated Sept 2025)
- Inspectie van het Onderwijs — Meldcode requirements and oversight
- CNS Ede protocol — meld-, overleg- en aangifteplicht steps (Jan 2025)
- NL Times — 2025 report on online sexual abuse prevalence among Dutch youth

APPENDIX A

When deciding whether to involve the police and/or Veilig Thuis, consideration should be given to the following questions. Answering these questions will support the DSL in considering whether a learner is at risk of harm, in which case a referral will be appropriate, whether additional information or support is needed from other agencies or whether the school can manage the incident and support the learners directly.

Do you have any concerns about the learner's vulnerability?



Why this question?

Consideration should be given to whether a learner's circumstances or background makes them additionally vulnerable. This could include being in care, having additional educational needs or a disability, or having been a victim of abuse.

Where there are wider concerns about the care and welfare of a learner, then consideration should be given to referring to Veilig Thuis.

Why was the imagery shared? Was it consensual or was the learner put under pressure or coerced?

Why this question?

A learner's motivations for sharing sexual imagery include flirting, developing trust in a romantic relationship, seeking attention or as a joke.

Though there are clearly risks when learners share imagery consensually, learners who have been pressured to share imagery are more likely to report negative consequences.

A referral should be made to the police if a learner has been pressured or coerced into sharing an image, or imagery is being shared without consent and with malicious intent.

Consideration should also be given to a learner's level of maturity and the impact of any special educational needs on their understanding of the situation.

You should take disciplinary action against learners who pressure or coerce others into sharing sexual imagery. If this is part of pattern of behaviour then you should consider making a referral to Veilig Thuis.

Has the imagery been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread of the imagery?

Why this question?

If the image has been shared widely on social media, this could cause significant embarrassment for the learner and have a long-term impact on their online reputation. It could also increase the risk of them being bullied or contacted by strangers online.

You should support a learner to report the imagery to any sites it is hosted on.

If the learner has tried to report the imagery and it has not been removed, then the learner should contact [Helpwanted.nl](https://www.helpwanted.nl) to have youth produced imagery removed from the internet. If the learner is



being contacted by people they don't know who have viewed the image then you should report this to the police.

How old is the learner or learners involved?

Why this question?

Children under the age of 13 are unable to consent to sexual activity. Any imagery containing sexual activity by under 13s should be referred to the police.

Being older can give someone power in a relationship, so if there is a significant age difference it may indicate the learner felt under pressure to take the image/video or share it.

Consideration should also be given to a learner's level of maturity and the impact of any additional educational needs on their understanding of the situation.

If you believe the imagery contains acts that you would not expect a learner of that age to engage in then you should refer the matter to the police.

Did the learner send the image to more than one person?

Why this question?

If a learner is sharing sexual imagery with multiple people this may indicate that there are other issues that they need support with. Consideration should be given to their motivations for sharing.

If you believe there are wider safeguarding concerns then you should make a referral to Veilig

APPENDIX B

Working with Parents/Guardians

Helping parents and guardians when their child has been involved in sexting

Learners can be involved in sexting in several different ways: They may lose control of their own image, receive an image of someone else, or share an image of another person. It can be difficult for those parents/guardians whose children have experienced any of these situations to know how to deal with the knowledge that their child has been involved in sexualised activity. Parents and guardians may feel shocked, upset, angry, confused or disappointed.

Whatever their feelings, it is important that professionals listen to their concerns and take them seriously. It can also be helpful for teachers and the police to reassure parents and guardians by



explaining that it is normal for learners to be curious about sex. Below are examples of the advice that police and schools could offer in a range of scenarios:

Parents or guardians whose child has lost control of a sexual image should be:

- Advised on the law around youth produced sexual imagery.
- Directed to encourage the learner to delete images from social media accounts, if they have uploaded them themselves.
- Directed to [Helpwanted.nl](https://www.helpwanted.nl) to see if it is possible to get the image removed if it has been shared more widely. This must be done as soon as possible in order to minimise the number of people that have seen the picture. Parents should also be informed about how to report sexual images on individual sites to get them taken down.
- Helped to have conversations with their child which they may find difficult. Parents and guardians may need help to shape these conversations. For example, you could suggest that they:
 - Reassure the learner that they are not alone and refrain from getting angry, let them know that they will do everything they can to help.
 - Listen and offer support.
 - Avoid questions, such as 'why have you done this?' which could stop the learner from opening up. Instead parents and guardians should stay focused to find a solution by asking who the image has been sent to and shared with, and to agree next steps.
 - Help their child to understand what has happened by discussing the wider pressures that they may face and the motivations of the person who sent on the photo.
 - Discuss issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they don't want to do, or to show them things that they are unhappy about. Parents should let their children know that they can speak to them if this ever happens.
 - Informed about sources of support for their child.

Parents/Guardians whose child has been sent a sexual image should be:

- Advised on the law with regards to saving, sharing, or looking at naked or sexual images of children.
- Supported to have conversations with their child and advised to:
 - Reassure the learner that they have done the right thing by speaking out and that you are there to help.
 - Explain to the learner the importance of not sharing the image further.
 - Listen to the learner's concerns without criticising their decisions.
 - Ask whether they requested the photo or if it was unsolicited. Confirm whether it has been sent by an adult or a child
 - Discuss issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they don't want to do, or to show them things that they are unhappy about. Let them know that they can speak to you if this ever happens.
 - If they asked to receive the photos, explain that they should also not put pressure onto others to do things that they are uncomfortable with.



- Provided with suggested ways that their child could speak to the sender in order to stop future correspondences. Alternatively, if the learner prefers, informed about how to block the sender.
- Directed to the Police if the images were shared by an adult, if their child is being contacted by adults and they are concerned about sexual exploitation or grooming.
- Directed for Counselling if appropriate.

Parents/Guardians whose child has shared another child's image should be:

- Advised on the law with regards to saving, sharing, or looking at naked or sexual images of children.
- Supported to have conversations with their child and advised to:
 - Stay calm and refrain from getting angry with the child
 - Ask who the image has been sent to and where it has been shared. Agree next steps for taking the image down, including deleting the image from their phone or any social media accounts and reporting it to service providers.
 - Identify whether they asked for the photo or were initially sent it without requesting.
 - Discuss issues of consent and trust in healthy relationships or friendships. Talk about the types of things which are and aren't ok to share and how they would feel if someone shared a personal photo of them.

If they have asked for the image, explain the importance of not pressuring others into activities that they may not want to take part in.

- Ask about their motivations for sharing the photo and discuss what they could have done differently. If they have reacted to an upsetting incident, such as the break-up of a relationship, by sending the photo onwards, talk about how they could have managed their feelings in a healthier and more positive way.
- Informed about sources of support for their child.

All parents/guardians whose child has been involved in any of the above should be:

- Given support to deal with their own feelings of upset and concern.
- Kept updated about any actions that have been taken or any support that their child is accessing, unless the child involved has specifically asked for this not to happen and is judged to be old enough to make that informed decision.
- Advised to contact their child's school if they have received their child's consent, so that teachers are able to offer support to any learner who is affected and ensure that the image is not circulated further.