THE BRITISH SCHOOL OF AMSTERDAM

SCP 1

Child Protection and Safeguarding Policy

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Important contact information

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Helen Rigelsford	h.rigelsford@britams.nl Internal extension: 8322
Principal	Ciaran Harrington	principal@britams.nl
Deputy DSLs (DDSLs) are the Heads and Deputy Heads of each school section	Early Years: Claudia van de Laar and Jane Keatley Junior: , Hannah Williams, Beth Dopson and Melanie Fidge Senior: Nick Loudon, Christian Nicolson and Duncan Grey	j.keatley@britams.nl c.newson@britams.nl h.williams@britams.nl b.dopson@britams.nl m.fidge@britams.nl n.loudon@britams.nl c.nicolson@britams.nl d.grey@britams.nl
Veilig Thuis	n/a	0800 - 2000
Chair of Supervisory Board and Supervisory Board and member responsible for Safeguarding	Ian Wilmshurst	i.wilmshurst@bsa.nl
Head of Technology	Zee Mirza	z.mirza@britams.nl
Head of Human Resources (with responsibility for safer recruitment)	Brenda van der Wilt	b.vanderwilt@britams.nl

1. Aims

This policy aims to provide information so that all staff are aware of their statutory responsibilities with respect to safeguarding and child protection and that appropriate action is taken in a timely manner to safeguard and promote children's welfare. At The British School of Amsterdam, staff are properly and regularly trained in recognising and reporting safeguarding issues.

The BSA is committed to providing a safe and secure environment for pupils, staff and visitors, and to promoting a climate where children and adults feel confident about sharing concerns they have about their own or others' safety and well-being.

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children, their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, everyone who works in school either on a contract or as a volunteer should make sure their approach is vigilant and child-centred. This means that they should consider, at all times, that which is in the **best interests** of the child.

Safeguarding applies to all children at school, and is a central consideration when planning changes to The BSA's organisation, schemes of work, pastoral organisation and activities.

Children in this document and in The BSA's context includes everyone under the age of 18, and will also extend to those over the age of 18 still on The BSA roll.

Safeguarding is not just about reacting to child protection concerns but is integral to:

- The provision of a safe learning environment (including online)
- Systems to ensure an effective equalities policy
- Safe recruitment practices, staff induction and training
- Effective behaviour management and anti-bullying strategies
- The recording of attendance, reporting of absence, off-rolling and exclusion
- Information sharing protocols
- Supporting vulnerable children
- Systems to support children with medical needs
- Substance abuse policies
- The curriculum, and ensuring all children are taught about safeguarding
- Extended schools and the use of premises by other groups
- Working in partnership with outside agencies

Safeguarding needs to take account of many influences on children, including those out of our control and online, and emerging events in local, national and international environments.

2. Legislation and guidance

This policy is based on the duel frameworks of both the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023), and the relevant Dutch child protection laws and guidance (Meldcode Huiselijk Geweld en Kindermishandeling (Reporting Code for Domestic Violence and Child Abuse).

This policy is also based on the further legislation, linked in Appendix A.

3. Definitions and scope

3.1 Definitions

Safeguarding and promoting the welfare of children means:

- 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 is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Child Abuse Any form of threatening or violent interaction of a physical, psychological or sexual nature, forced either actively or passively onto an under-age child by the parents or any other adult on whom the child is dependent or with whom the child lacks freedom to act, which results in, or is likely to result in, serious damage to the under-age child in the form of physical or emotional injury. This definition covers and complies with the Dutch definition of 'Kindermishandeling' as defined in WPO art 4b sub 2 and 3 and in art 1 in the Jeugdwet.

Neglect is a form of abuse and is 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. Appendix B defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is when children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images (AI) that otherwise appear to be a photograph or video.

Our safeguarding partners are

- The local health authority (GGD) and in particular The BSA school doctors for each school section
- Veilig Thuis (Safe Home)
- The local area police officer or in some cases the Zeden Politie (Vice Police) or online safety officer
- Leerplicht (Attendance)
- Child Abuse and Neglect Advisor, and provider of supervision for (D)DSLs

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

Meldcode/Reporting Code - the code by which all organisations who work with children up to the age of 18 must work, relevant to their own setting, in order to ensure high standards of safeguarding and child protection abiding by the laws and guidelines in the Netherlands

Stappenplan/Step Plan - the step plan in the Dutch Meldcode/Reporting Code must be followed by the DSL/DDSLs in order to establish how to support a child about whom a concern has been raised

Regulated contact is work (paid and unpaid) which involves certain close contact with children.

3.2 Scope

This policy applies to all employees, including the Principal and Bursar, and all club providers, volunteers and Supervisory Board members in The British School of Amsterdam, and is consistent with the procedures of our safeguarding partners.
This policy also applies to camps and trips, teacher-organised after-school activities, and off-site activities.

References to 'staff' includes senior leaders, teachers, teaching assistants, whole-school and support staff, supply staff, volunteers, and club providers unless indicated otherwise.
Throughout this policy, the term 'Senior Line Manager' refers to the relevant Head of School for classroom-based staff or the Operational Leadership Team line manager for support staff. The Principal or Bursar are the relevant Senior Line Managers for members of the Operational Leadership Team and the DSL.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see Section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are at risk due to either their own or a family member's mental or physical health needs
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated or who does not give details of their next school

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. The BSA plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in the Netherlands and beyond, and in a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policies
- Pastoral support system
- Planned programme of PSHE (personal, social and health education) and relationship and sex education (RSE)

5.1 Expectations for all staff

5.1.1 Responsibilities

All staff who are in regulated contact with children will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Sign or Complete a declaration within the first half term of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff who are not in regulated contact with children will:

- Read part 1 of KCSIE or annex A of KCSIE (a condensed version of part 1), but these staff are expected to read at least either section, and review this guidance at least annually
- Sign a declaration within the first half term of each academic year to say that they have reviewed the guidance.
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and Deputy DSLs (DDSLs), the behaviour policy, and the safeguarding response to children who go missing from education, and , The BSA's reporting system (CPOMS)
- Our early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL/DDSLs, and when asked to, sharing information with other professionals to support early identification and assessment
- The process for making referrals to outside agencies (see Appendix C, such as Veilig Thuis and The School Doctor) and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM and online abuse, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal
- exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual, gender questioning or trans (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- The fact that schools have a responsibility to support children even in cases where abuse or neglect takes place outside the school or the home
- What to look for to identify children who need help or protection
- Misinformation, Disinformation (including fake news) and Conspiracy theories and that we teach about these at an age appropriate level

5.1.2 Staff welfare in relation to Safeguarding

Should staff suffer mental health issues as a consequence of carrying out safeguarding and child protection duties as required by the 'Meldcode' (reporting code) and The BSA's Child Protection and Safeguarding policies, they can access support via their Senior Line Managers, the HR team and the Senior Leadership Team. In the event that staff face legal challenges as a consequence of carrying out their duties under the 'Meldcode' (reporting code) and The BSA's Child Protection and Safeguarding policies, The BSA will provide the necessary legal support. In order to access this the member of staff should speak to a member of the SLT.

In addition, the safeguarding teams within each school section have group supervision each full term with an external advisor in matters of child protection in order to be able to address difficult cases and gain a different perspective and thus contribute to continuing development of our practice. DSL/DDSLs (and occasionally other members of the pastoral team) are also offered an individual supervision session with this advisor each full term in order to process their personal responses to individual cases or safeguarding/child protection situations in school. Supervision takes into account the emotions/responses of those who have had to address these cases and always strives to ensure that by meeting their own needs staff are able to continue doing their jobs and work in the best interests of our pupils.

5.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the leadership team. The DSL takes lead responsibility for child protection and wider safeguarding at The BSA. This includes online safety, and working with the Head of Technology to understand filtering and monitoring processes in the Netherlands so that our pupils can be kept safe online when on school devices and school networks.

At times when the DSL is absent or off site the DDSLs (Heads of School and deputies) take over responsibility for any new incident that needs an immediate response or any existing incident that needs an immediate update or any other decisions that need to be made in relation to safeguarding and child protection.

If the DSL and DDSLs are not available, the Principal will act as cover (all of them are DSL level trained)

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children where relevant
- Refer suspected cases, as appropriate, to the relevant body (Veilig Thuis, GGD, OKA, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school and the differences between requirements in the Netherlands and in the UK.

The DSL will also:

- Keep the Heads of School and Principal and Bursar informed of any issues
- Liaise with relevant outside agencies for child protection concerns as appropriate
- Be aware of (and discuss where necessary) the local response to sexual violence and sexual harassment with police and local authority
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL is set out in their job description.

5.3 The Supervisory Board

The Supervisory Board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with Dutch law, and hold the Principal to account for its implementation
- Appoint a member of the Supervisory Board to monitor the effectiveness of this policy in conjunction with the full Supervisory Board. This is always a different person from the DSL. They will also be aware of their obligations under the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty)
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate (for the Netherlands) filtering and monitoring systems in place, and review their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training and how requirements differ between the Netherlands and the UK.
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support The BSA in meeting these standards in relation to requirements in the Netherlands which differ significantly from those in England
- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
    - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
    - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place

    - The BSA has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff. Appendix E of this policy covers this procedure
    - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities, e.g. Majest (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
    - Make sure there are arrangements for the body to liaise with The BSA about safeguarding arrangements, where appropriate
    - Make sure that safeguarding requirements are a condition of using The BSA premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of the Supervisory Board will act as the 'case manager' in the event that an allegation of abuse is made against the Principal or Bursar, where appropriate (see Appendix E).

5.4 The Principal

The Principal is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems which support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against a member of staff or volunteer, where appropriate (see Appendix E)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, mobile phones and cameras in the setting

6. Confidentiality

All staff must maintain a high level of confidentiality whilst addressing any safeguarding or child protection concern. At the same time they will recognise that sharing of information with the right people (for example the DSL, DDSL, the Head of School or a school counsellor) is vital in ensuring the safety of pupils about whom a concern has been identified.

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- European GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the GDPR contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child or anyone else at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks The BSA not to tell anyone about sexual violence or sexual harassment:

    - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the European GDPR that applies
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
    - The DSL should consider that:
        - Parents or carers of children under 16 should normally be informed (unless this would put the victim at greater risk). Parents or carers of children over 16 should be informed if the child involved gives consent for this to occur.
        - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, the step code (stappenplan) in the reporting code (meldcode) should be followed to ensure that the child gets necessary support as soon as possible.
        - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 12 in the Netherlands, if the alleged perpetrator is under 12, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
    - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
    - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information. These golden rules are relevant to the sharing of information in the Netherlands too, and whilst some aspects in the information sharing advice relate to the UK only, overall the advice is important and relevant for us too. There is no better Dutch alternative that we are aware of so we have made the decision to keep this link in this policy.
- If staff are in any doubt about sharing information, they should speak to the DSL/DDSL
- Confidentiality is also addressed in this policy with respect to record keeping, and allegations of abuse against staff in Appendix E

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have an education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage

- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and Supervisory Board members must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL or DDSL".

In the Netherlands we are required to follow the Step plan (Stappenplan) within the Reporting Code (Meldcode). We are required to follow the steps to the point that the child is deemed to be receiving the support s/he needs and is safe. Following the Meldcode and Stappenplan is an obligation in the Netherlands, but reporting child abuse and neglect in the Netherlands is a right and not an obligation.

7.1 If a child is suffering or likely to suffer harm, or is in immediate danger

Staff are expected to record a concern on The BSA's reporting system (CPOMS) or in an emergency situation when no DSL/DDSL is available, make a referral to Veilig Thuis and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Record on CPOMS (see section 5.2) as soon as possible if you make a referral directly.

You can reach Veilig Thuis on: 0800 - 2000

You can reach the emergency line for the police (and/or other emergency services) on: 112

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. **Do not promise to keep it a secret**
- Write up your conversation as soon as possible and preferably on the same day onto The BSA's reporting system (CPOMS) in the child's own words. Stick to the facts, and do not express your own opinion
- Do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL or making a report on The BSA's reporting system (CPOMS) if you have concerns about a child.

7.3 If you discover that Female Genital Mutilation (FGM) has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises 'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs'.

FGM is illegal in the Netherlands and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in Appendix F of this policy.

Any member of staff who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth. (Staff should not examine pupils).

Must immediately report this to the DSL via The BSA's reporting system (CPOMS). The DSL will then contact the police and/or other relevant safeguarding partners such as the Centrum for Sexueel Geweld (Centre for sexual violence).

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should report on CPOMS and speak to the DSL who will follow our local safeguarding procedures.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

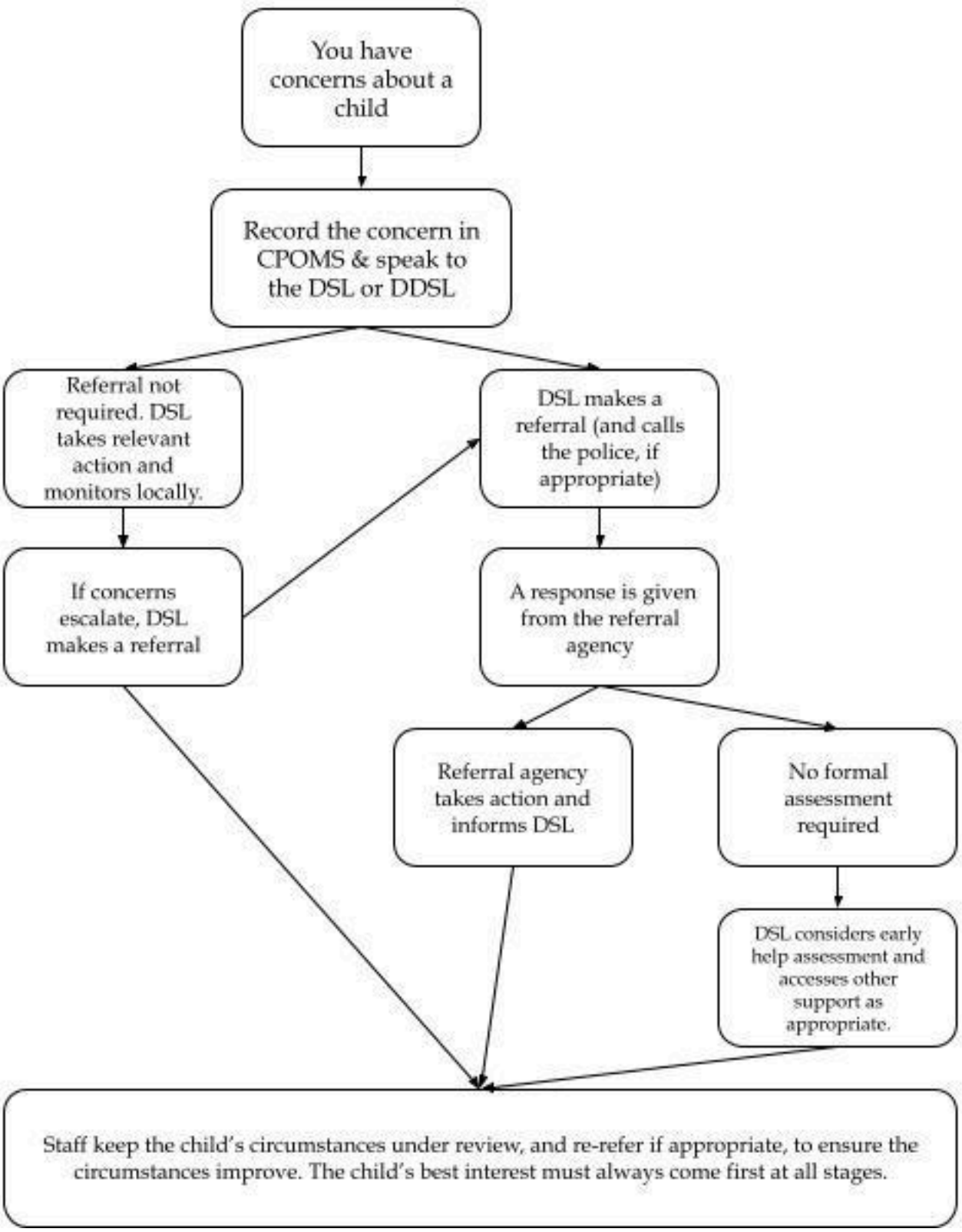
Figure 1 below illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

The aim should always be to share the concern as soon as possible (on the same day) with the DSL by completing a new concern on The BSA's reporting system (CPOMS). Staff are always also able to speak to the DSL about any concern they have but should not wait to have the conversation before completing the concern form on The BSA's reporting system CPOMS.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and they will take over decision making. Share details of any actions you take with the DSL via The BSA's reporting system, CPOMS, as soon as practically possible.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)



7.4.1 Early help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and

professionals in an early help assessment, in some cases acting as the lead practitioner (for example Learning Support Coordinators or school counsellors who have been closely involved in working with a child).

The DSL will keep the case under review and The BSA will consider a referral to Veilig Thuis or another relevant agency if the situation does not seem to be improving.

Early help for children in the Netherlands can be provided by any of several agencies, for example:

- The BSA School Doctor
- The Huisarts (GP)
- The OKT (Ouder Kind Team) or equivalent in the area the child resides
- Jeugdzorg (Youth Care)
- Private psychologists, counsellors or therapists

7.4.2 Referral

If it is appropriate to refer the case to a local outside agency or the police, the DSL will make the referral or support another member of staff to do so.

If you make a referral directly, you must tell the DSL as soon as possible.

Veilig Thuis currently follow a policy to make a decision within 5 working days of a referral about what course of action to take and should let the DSL know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, and is not in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a DDSL or a member of the senior leadership team. They will decide whether to make a referral to the 'Programma Radicalisering en Extremisme', the police or Veilig Thuis, if appropriate (see 'Referral' above). Inform the DSL as soon as practically possible after the referral by completing a new concern form on The BSA's reporting system (CPOMS). Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the 'Programma Radicalisering en Extremisme' the police, Veilig Thuis, or the local area safeguarding team.

In an emergency, call 112 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.6 If you have a concern about mental health

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is not also a safeguarding concern, speak to the school counsellors/Head of School/Deputy Head/Head of Key Stage to agree a course of action.

Refer to the Department for Education guidance on mental health and behaviour in schools for more information.

7.7 Concerns about a staff member

If you have concerns about a member of staff (including a supply teacher, volunteer, club provider, contractor or Supervisory Board member), or an allegation is made about a member of staff (including a supply teacher, volunteer, club provider, contractor or Supervisory Board member) posing a risk of harm to children, speak to the Principal as soon as possible. If the concerns/allegations are about the Principal, speak to the Chair of the Supervisory Board.

The Principal (Chair of Supervisory Board) will then follow the procedures set out in Appendix E, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer, club provider, contractor or Supervisory Board member) to the Principal, report it directly to the Chair of the Supervisory Board.

If you receive an allegation relating to an incident where an individual or organisation was using The BSA premises for running an activity for children, follow The BSA safeguarding policies and procedures as you would with any safeguarding allegation.

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour and/or anti-bullying policies, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in The BSA at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See Appendix B for more information about child-on-child abuse.

7.8.1 Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation on The BSA's reporting system (CPOMS) and tell the DSL, but **do not** investigate it
- Where relevant, the DSL will contact relevant outside agencies and follow advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DSL will contact relevant outside agencies or our own school counsellors, if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

All actions, meetings, correspondence, with anyone involved will be recorded on The BSA's reporting system (CPOMs).

At the BSA each head of school is the Anti-Bullying lead for their school section and directs any investigation into bullying.

7.8.2 Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant about issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
    - That they should record their concern on CPOMS and speak to the DSL if they have any concerns
    - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The relevant Head of School, along with the DSL, will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident does not (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Sharing of nudes and semi-nudes ('sexting')

This is a suggested approach based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident:

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images (AI) that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately via The BSA's reporting system (CPOMS).

You must **not:**

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL/DDSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL/DDSL.

7.9.1 Initial review meeting

Following a report of an incident, the DSL/DDSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police, or het centrum voor Sexueel Geweld (Centre for Sexual Violence)
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police or het Centrum for Sexueel Geweld and/or the police if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See Appendix B for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Principal, Heads of School and other members of staff as appropriate, may decide to respond to the incident without involving the police or any other agency.The decision will be made and recorded in line with the procedures set out in this policy.

7.9.2 Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They, or someone appointed by them, will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

7.9.3 Informing parents/carers

The DSL/DDSL will inform parents/carers of children at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

7.9.4 Referring to the police

If it is necessary to refer an incident to the police, this will be done either via contacting our local police link person or by contacting another relevant branch of police - for example the Zedenpolitie (vice squad) or the digital police officer.

7.9.5 Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on The BSA's reporting system (CPOMS). The record keeping arrangements set out in this policy also apply to recording these incidents.

7.9.6 Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Relationships and Sex Education (RSE) programme.

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will, where possible, take the child's wishes and feelings into account when determining what action to take and what services to provide.

Throughout The BSA via positive relationships with staff, the teaching of PSHE and the specific systems described above pupils are made aware that they will be supported by any member of staff to whom they report a concern and that their worries will be taken seriously.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations. To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Early Years pupils are encouraged to report concerns through:

- Open relationships with staff
- One-on-one or small group conversations
- Use of puppets and persona dolls to explore situations
- Staff awareness of non-verbal disclosures (e.g., artwork, behaviour)
- Regular class discussions and assemblies emphasising the importance of sharing worries
- Encouraging children to talk to any trusted adult (teachers, staff, family, friends, neighbours)

Junior School pupils are supported in reporting concerns through:

- Open relationships with staff, especially classroom teachers

- One-on-one or small group conversations with staff
- Class worry boxes for anonymous or named concerns, checked regularly by teachers
- Regular talks, assemblies, and PSHE sessions (including Jigsaw assemblies) addressing various issues
- Consistent reminders to share concerns with trusted adults
- Staff responsiveness to observed issues, encouraging reflection and discussion
- Staff awareness of non-verbal disclosures (e.g., written work, artwork, behaviour)

Senior School pupils are supported in reporting concerns through:

- Open relationships with all staff members, particularly form tutors, PSHE teachers, learning support assistants and school counsellors
- Freedom to approach any staff member for help both face to face or by email
- Consistent reminders to share concerns with trusted adults
- Regular PSHE sessions addressing the importance of sharing worries
- Staff awareness of non-verbal disclosures (e.g., written work, artwork, behaviour)

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, The BSA aims to:

- Have robust processes including filtering and monitoring systems in place to ensure the online safety of pupils, staff, volunteers and Supervisory Board members (* as far as is possible in the Netherlands aspects of what is expected in terms of monitoring in the latest version of KCSiE contravene Dutch privacy laws)
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community(this is also a requirement from the Dutch government from January 2024)
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

8.1 The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

- Educate pupils about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required

- Educate parents/carers about online safety via communications sent directly to them and during parents' evenings and workshops. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
    - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and Supervisory Board members aware that they are bound by an agreement and the school's policy regarding Acceptable Use of the internet in school, use of The BSA's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Staff should be aware that in the Netherlands they are NOT allowed to search a child's mobile phone. This is something that only the child themselves, the parent or the police can be asked to do.
- Our network security is managed through on-premises firewalls and filtering. This system applies specific filtering parameters based on pupils' WiFi login credentials for BYOD scenarios and integrates with locally enrolled devices. We are actively researching and planning to test live monitoring solutions to enhance our proactive approach to network security and safeguarding. This robust setup aims to limit children's exposure to online risks by providing comprehensive filtering and monitoring across our IT systems.
- Carry out an annual review of our approach to online safety
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our Acceptable Use of IT Policy and our Electronics, Communications and Social Media Policy

8.2 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

The BSA recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deep fakes', where AI is used to create images, audio or video hoaxes that look real.

The BSA will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying/behaviour policy.

9. Locker Checks and Searches

To ensure the safety and security of all pupils and staff, and as a necessary part of our safeguarding duty, the school reserves the right to conduct checks and searches of pupil lockers.

- Purpose and Scope: Checks can be general and preventative (routine safety checks) or specific, following a concern or suspicion that a locker may contain items that violate school rules or pose a risk to safety or welfare. For specific (non-routine) searches, reasonable efforts will be made to conduct the search in the presence of the pupil concerned, unless there is a concern that doing so would compromise the search, risk the safety of the pupil or others, or delay necessary action.
- Notice: Checks and searches may be conducted with or without advance notice to pupils and/or parents (announced or unannounced).
- Presence of Law Enforcement: Checks may take place with the presence of law enforcement (such as police officers) or without their involvement, at the school's discretion. Searches will be conducted reasonably and proportionately, and two members of staff will be present throughout locker checks.
- Items uncovered that are not allowed on school premises according to school policies, or are a risk to safety, can be confiscated. Discovering such items during locker searches can lead to disciplinary measures.

- In case of items found that are not allowed on school premises according to school policies, endanger safety at school, or constitute a serious crime, the school will inform or involve law enforcement, report to relevant authorities, and inform parents. Involvement of law enforcements is decided at the Management Board's decision and discretion only.
- By accepting and using a locker, pupils and parents acknowledge that the locker remains the property of the school and that the contents are subject to search in accordance with the terms laid out in this policy.

10. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL/DDSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL/DDSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the relevant outside agency (eg. Veilig Thuis or the police) before deciding whether or not to do so

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will bear in mind that every child has the right to confidentiality where this is possible. We will work with any outside agencies involved to make sure our approach to information sharing is consistent.

The DSL/DDSLwill, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

11. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

We offer extra pastoral support for these pupils. This includes:

- Education, Health and Care Plans formed and implemented with the Learning Support department which include any issues relating to safeguarding
- Developing relationships with key members of staff within their team who get to know them quickly and well, take extra time to listen to them and report any concerns straight away. These members of staff may be members of the pastoral team, Learning Support department, in class support assistants or school counsellors in the senior school
- Parents are encouraged to be in contact with school about any concerns as they arise and meetings are held regularly with parents in school or online
- Through our PSHE program other pupils are also taught to develop an awareness and empathy for all their peers and to report any concerns they observe

- Pupils have access to the school counsellors where that is requested or needed
- We are able to make relevant referrals to outside agencies where necessary too

Any abuse involving pupils with SEND will require close liaison with the DSL/DDSL and the Learning Support Coordinator for the relevant school section.

12. Pupils with a social worker

Pupils may need a social worker (maatschapelijk werker) due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL/DDSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL/DDSLwill always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

13. Pupils who are lesbian, gay, bisexual, transgender or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual, transgender or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more details on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL/DDSL.

When families/carers are making decisions about support for transgender or gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs.

We will also consider the broad range of their individual needs, in partnership with their parents/carers for pupils up to the age of 16 (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). Post 16 children in the Netherlands can decide whether to involve their parents. We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

14. Complaints and concerns about school safeguarding policies

14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Appendix E).

14.2 Other complaints

Other safeguarding-related complaints should be addressed as follows:

- Parents/carers should follow the procedures outlined in The BSA's Complaints Policy for parents.
- Staff members should direct their complaints to the Principal.

These channels ensure that all safeguarding-related complaints are properly addressed.

14.3 Whistle-blowing

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in The BSA's safeguarding practices, and understand that such concerns will be taken seriously by the Management Board. Appropriate whistleblowing procedures, which can be found in Firefly, are in place for such concerns to be raised.

Please refer to the Whistleblowing Policy for more information on this topic.

15. Record-keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing on The BSA's reporting system, CPOMS. If staff members are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

All contracted staff have a CPOMS account that is assigned to them at the time they complete their introduction safeguarding training. This means that when they are approved to begin working with children their account is already set up and tested.

Club providers, YMBSA staff, Majest and catering and cleaning staff do not have a CPOMS account but they do receive introductory safeguarding training. Part of this training is to ensure that they know to report any safeguarding or child protection concerns to the DSL or a DDSL as soon as possible after a concern is observed (and no later than the following day).

Any non-confidential records will be readily accessible and available to relevant people. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual pupils will be retained until they reach the age of 25 years. Please refer to the data retention table in the data protection policy regarding retention periods.

When a child with current or previous child protection concerns transfers to another school, The BSA will ensure that their child protection file is forwarded securely and promptly, separate from the main pupil record. The DSL/DDSL will facilitate this process. Additionally, where appropriate, safeguarding concerns may be communicated either through the secure transfer of the separate safeguarding file or via direct verbal contact with the receiving school's DSL/DDSL or another relevant staff member. This approach ensures continuity of care and the timely sharing of essential safeguarding information with the child's new educational setting. Parents, and where appropriate (from age 16 up) pupils will be told beforehand that this information will be shared. An exception to this is in situations where the child/parents/guardian being made aware would put anyone at risk.

To ensure appropriate support is in place upon the child's arrival, we aim to transfer the information:

- within 5 days for an in-year transfer, or
- within the first 5 days of a new term.

We acknowledge that our pupils often transfer to schools globally, as well as within the Netherlands, and varying policies and practices at receiving institutions may impact this timeline. In such cases, we strive to complete the transfer as quickly as possible while adhering to data protection regulations and the receiving school's protocols.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL/DDSLwill speak to the DSL/DDSLof the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

When sharing safeguarding and child protection information with another school or agency we always inform the parents (or child themselves if 16 and over) unless we think that doing so might cause a risk to the child or to anyone else.

Appendix E sets out our policy on record-keeping with respect to allegations of abuse made against staff. For terms of record and data retention, we refer to the British School of Amsterdam's Data Protection Policy.

16. Training

16.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand The BSA's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from safeguarding partners
- Include online safety
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all pupils

All staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (via the monthly staff briefing, the weekly bulletin, Cafe Ped, Educare or National College courses, and training arising from specific needs identified in school).

Club providers, Music teachers, Appel staff, B2 Cleaners and Majest staff, and volunteers will also receive safeguarding training on induction and thereafter at least once every 2 years.

16.2 The DSL and DDSLs

The DSL/DDSLs and key pastoral staff will undertake DSL level child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

The DSL/DDSLs will also undertake Prevent awareness training and will follow developments towards a Prevent Duty or similar in the Netherlands. All staff will be made aware of how to respond to issues of extremist ideology, misogyny or other issues that may,in the UK, have given rise to a Prevent referral.

16.3 Supervisory Board Members

All Supervisory Board Members receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support The BSA to deliver a robust whole-school approach to safeguarding

As the Chair of the Supervisory Board may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal or Bursar, they receive training in managing allegations for this purpose.

16.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at The BSA will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See the Safer Recruitment Policy that is available on Firefly and via our website for more information about our safer recruitment procedures.

16.5 Staff who have contact with pupils and families

The DSL, DDSLs and counsellors, who deal with complex cases with children and families, will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

17. Monitoring arrangements

The Principal, Bursar, Heads of School, DDSLs and DSL will monitor the effectiveness of this policy. This policy will be reviewed **annually** by the DSL.

At every review, it will be approved by the Supervisory Board.

Appendix A: Relevant legislation

This policy is also based on further legislation.

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015
- UK guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children in England
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- UK guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our Supervisory Board members and Principal should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage
- Wet Meldcode en Huiselijk Geweld: https://www.rijksoverheid.nl/onderwerpen/huiselijk-geweld/meldcode

Appendix B: Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or 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.

Emotional abuse (sometimes referred to as psychological abuse) is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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 participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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
- 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 (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is 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 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 home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs and may also consist of Affluent neglect. Affluent neglect occurs when families do not suffer financial hardship and children have no lack of material goods (clothes, electronics, access to sports clubs and facilities for example) but they do have a lack of care and attention from their parents.

Appendix C: The step plan within the Dutch Meldcode (reporting practice)

7.1 The steps

Dutch domestic and child abuse reporting code

Step 1	Map and record the signals
Step 2	Consult with family, friend, colleague or Veilig Thuis
Step 3	Talk to the person concerned
Step 4	Weigh nature, severity and risks*
Step 5	Organise help and/or report it to Veilig Thuis*



* = Use the assessment framework of your professional group

Step 1: Map and record the signals

Noticing difficulties in the development of a child, and discussing these with parents/guardians is an important aspect of the professionalism of all teachers and managers. This professionalism is expected in every contact with a child/minor and his/her parents/guardians. When attention is given to signals of child abuse/neglect/domestic abusethis is often accompanied by a feeling that 'something is not quite right' beforehand. The observed signals, as well as any further information provided by parents, form the basis of any further action.

Step 2: Consult with family, friend, colleague or Veilig Thuis

The teacher or member of staff who first noticed the signs of child abuse/neglect/domestic abuse will first discuss these with the Head of their school (DDSL) or the DSL and make a record on The BSA's reporting system (CPOMS). The DSL may choose to seek (anonymous) advice from Veilig Thuis (VT), the advice and reporting centre for child abuse/neglect/domestic abuse.

Step 3 : Talk to the person concerned (pupil/parents/guardians)

This step is to have a conversation with the individuals involved, including - wherever possible - the child him or herself. Parents/guardians should also be invited to discuss the concern at this stage. This conversation should not take place without the advice and usually the involvement of the DSL

Step 4: Weigh nature, severity and risks

At this point the care team will be convened within school to discuss the outcome of the meetings/conversations with pupils and parents/guardians. A decision will be made as to whether there is evidence to suggest domestic abuse or child abuse/neglect has occurred. If in any doubt we will consult with Veilig Thuis for advice.

Step 5: Organise help and/or report it to Veilig Thuis

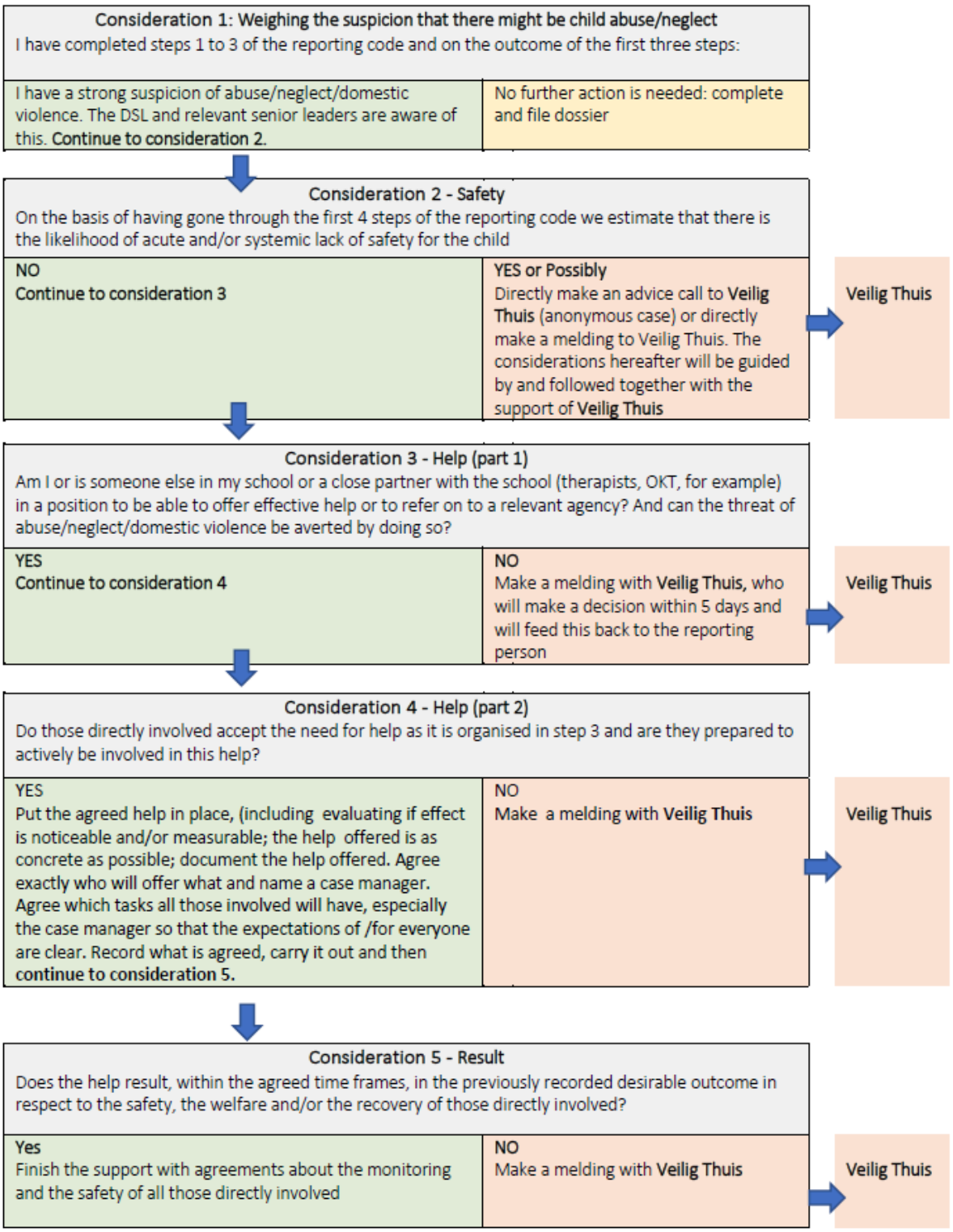
At this stage the care team will consult the decision table (afwegingskader) below to come to an agreement as to whether we are in a position to offer the onward help and referral the child/family needs to ensure that the negative situation stops as soon as possible and does not start again at a later date. If we feel it is not within our capability to do this then we will make a formal report (a melding) with Veilig Thuis. In the case that The BSA makes a formal report we should nearly always inform the parents/guardians and where appropriate the pupil of why we are taking this step and what will happen next.

Note: The possibility to make a report to VT without first having conducted a conversation with the parent/guardian is only possible when:

- the safety of the child, the parents/carers, yourself or any other individual is threatened
- you have good reason to believe that the client will break contact with you upon hearing the information.

Decision Table (Afwegingskader) to refer to as part of the decision making at Step 5:

Detail of the five considerations and conclusions in steps 4 and 5 of the reporting code for Child Abuse and Neglect in the Netherlands



Details of the five considerations and conclusions in steps 4 and 5 of the reporting code for Child Abuse and Neglect in the Netherlands

1. **Weighing the suspicion that there might be child abuse/neglect**
2. I have completed steps 1 to 3 of the reporting code and
3. **A** On the outcome of the first three steps no further action is needed: complete and file dossier
4. **B** I have a strong suspicion of abuse/neglect/domestic abuse. The DSL and relevant senior leaders are aware of this. Continue to consideration 2.
2. **Safety**
3. On the basis of having gone through the first four steps of the reporting code we estimate that there is the likelihood of acute and/or systemic lack of safety for the child
4. **A. NO >** continue to consideration 3
5. **B. YES or Possibly >** Directly make an advice call to Veilig Thuis (anonymous case) or directly make a melding to Veilig Thuis. The considerations hereafter will be guided by and followed together with the support of Veilig Thuis
3. **Help 1**
4. Am I or is someone else in my school or a close partner with the school (therapists, OKT, for example) in a position to be able to offer effective help or to refer on to a relevant agency? And can the threat of abuse/neglect/domestic abuse be averted by doing so?
5. **A. NO >** Make a melding with Veilig Thuis, who will make a decision within 5 days and will feed this back to the reporting person
6. **B. YES >** Continue to consideration 4
4. **Help 2**
5. Do those directly involved accept the need for help as it is organised in step 3 and are they prepared to actively be involved in this help?
6. **A. NO >** Make a melding with Veilig Thuis
7. **B. YES >** Put the agreed help in place, plan in evaluation times at which can be judged whether the effect is noticeable and/or measurable. Make the help offered as concrete as possible and document the help offered. Agree exactly who will offer what and name a case manager. Agree which tasks all those involved will have, especially the case manager so that the expectations of and for everyone are clear. Record what is agreed, carry it out and then continue to consideration 5.
5. **Result**
6. Does the help result, within the agreed time frames, in the previously recorded desirable outcome in respect to the safety, the welfare and/or the recovery of those directly involved?
7. **A. NO >** Make a melding with Veilig Thuis
8. **B. Yes. >** Finish the support with agreements about the monitoring and the safety of all those directly involved

Follow-up at The BSA

When the Care Team has offered support/referrals to the family, they also discuss within the team who is going to be responsible for coordinating the care, moving forwards. The Care Team follows the advice of the support/referrals offered, and adjusts this as necessary. If it becomes apparent that it is still necessary, a 'melding' (report) to Veilig Thuis should be raised if the child abuse/neglect/domestic abuse is ongoing or starts again. Finally, after-care is offered to the family/members of staff involved, and an evaluation is made by the Care Team as to how the case was handled. (Stappenplan translated by Helen Rigelsford, April 2024).

Appendix D: safer recruitment and DBS checks – policy and procedures

The BSA has a Safer Recruitment Policy that is available on Firefly and via our website.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where The BSA makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request relevant official checks, e.g. enhanced DBS checks with barred list information, on those people.

Where The BSA is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix E: Allegations of abuse made against staff (allegations against staff, including low-level concerns)

Section 1: Allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult the police or Veilig Thuis.

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will usually be the Principal, or the Chair of the Supervisory Board where the Principal or Bursar is the subject of the allegation, or Head of School. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using The BSA premises to run activities for children, we will follow our safeguarding policies and procedures and inform the relevant outside agency.

Any allegation regarding sexual misconduct by a member of staff toward a pupil of the school which is found to be substantiated, must be reported by the school (Management Board or DSL) to the confidence inspector ('vertrouwensinspecteur') of the Dutch School Inspection.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

If in doubt, the case manager will seek views from the DSL and the Head of HR, as well as the police and Veilig Thuis if they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated**: there is sufficient evidence to prove the allegation
- **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False**: there is sufficient evidence to disprove the allegation
- **Unsubstantiated**: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the DSL, Head of School and possibly the individual's Senior Line Manager. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police or any other external services. (The case manager may, on occasion, consider it necessary to involve the police before consulting those mentioned above – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify them as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the DSL/Head of School/Senior Line Manager (and the police or external services, where necessary). Where the police and/or external services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought the, police and/or external services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to Veilig Thuis or another appropriate agency (for example the police or centrum for Seksueel Geweld).
- **If immediate suspension is considered necessary**, agree and record the rationale for this on a Threshold of Harm form. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the DSL/Head of School/Senior Line Manager what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the DSL/Head of School/Senior Line Manager and the police or external agencies involved to initiate the appropriate action in school
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. This might be the Head of HR, the Head of School or their Senior Line Manager. They may also be advised to contact the Confidence Person (or their union if they are a member of a Dutch union).
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with any other individuals or outside agencies involved,, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers and other staff (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS or equivalent if the staff member has lived/worked with children in another country where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If The BSA is made aware that the UK Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible The BSA will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by The BSA, such as a supply teacher or contractor provided by another agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with relevant agencies to determine a suitable outcome
- The Principal/ Supervisory Board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the police or other agencies as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the police or any other involved agency whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or other agencies.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or The BSA ceases to use their services, or the individual resigns or otherwise ceases to provide their services, The BSA will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, The BSA will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending The BSA.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to Veilig Thuis or another outside agency may be appropriate
- Shown to be deliberately invented, or malicious, The BSA will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The BSA will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the DSL, police and other relevant agencies, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, The BSA will provide a copy to the individual, in agreement with the police or any other outside agencies involved, as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the Head of School, DSL and/or any other outside agency involved to determine whether there are any improvements that we can make to The BSA's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

The BSA will support any individual making a report of historic abuse.

Where an adult makes an allegation to The BSA that they were abused as a child, we will advise the individual to report the allegation to the police in the country where the abuse occurred.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside The BSA
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of The BSA may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the police or another external authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in The BSA's safeguarding system

There is specific training about the reporting of low level concerns at induction and staff are helped to see that it is important that they become 'the voice of the child' in such situations. Staff are assured that any low level concerns reported will be treated professionally by the Head of School or the Principal to whom they are reported. When staff report a low level concern they do so on our Low level Concerns Form.

Staff are told that the concern will be responded to sensitively, but that, due to reasons of confidentiality, the outcome cannot usually be shared with the reporting member of staff.

Responding to low-level concerns

If the concern is raised via a third party, the Principal or Head of School will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Principal or Head of School will use the information collected to categorise the type of behaviour and determine any further action, in line with the Staff Code of Conduct. The Principal or Head of School will be the ultimate decision-maker in respect to all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with European GDPR (AVG)
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in Section 1 of Appendix E,
- Retained for two (2) years after the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, if possible we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to an outside agency and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix F: Specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to the police. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chat rooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/end to end encrypted platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the leerplicht ambtenaar (attendance officer) in the gemeente (local authority) where a child lives if a child leaves The BSA without a new school being named, and adhering to requirements with respect to sharing information of both the Netherlands and the country in which the child will attend school, when applicable, when removing a child's name from the admission register at non-standard transition points.We are also required to report unauthorised absence to DUO. Admissions staff have responsibility for this reporting.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will follow the reporting code and the step plan to ascertain how to act on such occasions and in urgent situations will seek advice or make a report to either Veilig Thuis or Leerplicht (or both).The police will be called, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis

factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to Veilig Thuis and/or the police and/or the leerplicht ambtenaar (attendance officer) in the local authority where the child lives, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the Child Criminal Exploitation indicators above, indicators of Child Sexual Exploitation can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to Veilig Thuis and/or the police if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening at this school.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Lucy Faithfull Foundation's "Shore Space" is a resource available for young people concerned about their own or another's sexual thoughts or behaviours, pupils can be made aware of it via PSHE lessons or via support from pastoral staff: https://shorespace.org.uk/

Domestic abuse (previously referred to as Domestic violence)

Under Dutch law domestic abuse is included as a form of child abuse and is defined as physical, mental or sexual abuse, or threat thereof, by someone within the domestic setting.

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the 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.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside the home. Children who witness domestic abuse are also victims.

Older children (usually from secondary school age up) may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

The DSL/DDSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL/DDSLs will contact Veilig Thuis, The BSA doctor or other relevant professional partners so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures.

Where a child has been harmed or is at serious risk of harm, the DSL will also make a melding (report) to Veilig Thuis.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

Female Genital Mutilation (FGM)

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM. How will staff access this training?

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations
    - Asking for help, but not being explicit about the problem
    - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within Dutch society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period

- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this immediately to the DSL/DDSL via The BSA's reporting system (, CPOMS, or similar) and verbally.

The DSL/DDSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the police and/or Veilig Thuis
- Refer the pupil to a pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
    - Negate or destroy the fundamental rights and freedoms of others; or
    - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
    - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- **Terrorism** is an action that:
    - Endangers or causes serious violence to a person/people;
    - Causes serious damage to property; or
    - Seriously interferes or disrupts an electronic system
- The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training alongside members of the SLT and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with the Programma Radicalisering en Extremisme, our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place as far as possible under Dutch provision,and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Until recently there were no expectations similar to Prevent, of education professionals in the Netherlands. Recently the Dutch government is trialling a framework for school staff to identify and respond to cases of (possible) radicalisation and extremism. As soon as this is taken into widespread use or required by law this policy will be updated. Until then we will continue to follow the guidelines above (from the Prevent Duty) and work in partnership with staff at the Programma Radicalisering en Extremisme .

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within The BSA that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again

- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to read an agreement upon entering The BSA about how to conduct themselves during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in and wear a red lanyard, indicating that they should be accompanied by a member of school staff at all times.

Visitors to The BSA who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will initially be asked to show photo ID and:

- Will be asked to show their VOG certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the GGD, leerplicht (attendance service), or educational psychology service, will provide prior written confirmation that an appropriate level of VOG check has been carried out (if this is provided, we will not ask to see the VOG certificate)
- These visitors can wear a green lanyard indicating that they have had the relevant checks but that they are not a contracted member of school staff.

We will not invite into The BSA any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Collection and non-collection of children from school

Early Years School:

Only a known and named adult may collect children in the Early Years. If a child is not collected on time, parents are contacted to confirm their expected arrival. Children remain with their class teacher until 4:00 PM. After this time, they are supervised by the Head of Nursery or Head of School until the parents arrive. Parents are regularly reminded of the importance of punctuality through the weekly newsletters. Late arrivals and collections are carefully tracked; individual families are alerted about punctuality concerns by the Head of School

In the Early Years School if a child is not collected on time, parents are contacted to confirm their expected arrival. Children remain with their class teacher until 4:00 PM. After this time, they are supervised by the Head of Nursery or Head of School until the parents arrive. Parents are regularly reminded of the importance of punctuality through the weekly newsletters.

Junior School

In Years 2 and 3 only a known and named adult may collect a child/children. From the age of nine upwards parents may arrange for children to go home alone (see below). Parents/carers must inform The BSA of any changes in child collection arrangements. Contact with a parent/carer is sought before a child is allowed off The BSA premises. Parents must give consent for Junior pupils aged nine and above to go home unsupervised by an adult. Late collection is recorded.

In the Junior School, if a child is not collected on time, they are brought to the main reception at 3.40, and parents are contacted to confirm their expected arrival. They are then supervised by the general Teaching Assistant until 4pm. After this time, they wait with the Reception team and if beyond 5pm with the Head of School or Head of ECA. Late arrivals and collections are carefully tracked; individual families are alerted about punctuality concerns by the Head of School and more broadly messages around attendance are shared through the weekly newsletter.

Senior School:

Pupils in the Senior School may go home alone, but The BSA should have details of their responsible adults. If a child is collected before the end of the school day they are signed out by the collecting adult. Time and reason for collection is included. Senior School pupils who have arrangements to leave early must sign out at the front door.

In the Senior School, children generally make their own way home at the end of the day. However, if a child is unsure or expecting to be collected and isn't we would contact parents and they would wait with the Reception team. Repeated or persistent late collection would result in a conversation with the family and wider conversations about attendance and punctuality are shared more broadly in the weekly newsletter.

At the BSA we are aware of 'Working Together to Improve School Attendance 2024' https://www.gov.uk/government/publications/working-together-to-improve-school-attendance and use it in conjunction with Dutch attendance law and information

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, our staff will make every effort to contact parents. If they have not been reached within reasonable time (maximum 7 working days) a recorded letter will be sent to the home, if there is no response to this a member of SLT and another (D(D)SL will make a home visit. If at this point no contact is made the matter will be referred to the police and Veilig Thuis.