Safeguarding and Child Protection Policy

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LINKS TO OTHER RELEVANT DOCUMENTS

- Recruitment Policy
- IT Acceptable Use Agreement
- Behaviour Policy
- Major Emergency Plan
- GDPR Policy
- Trips Policy
- Complaints Policy
- Staff Conduct, Competence & Capability Policy and Procedures

Contents

1. Statement of Intent

The British School of Brussels is a vibrant international school community of over 70 nationalities. We are proud to be an inclusive international learning community, working together and inspiring success.

We are committed to safeguarding and promoting the welfare, both physical and emotional, of every student within the school community. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of students is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with Belgium safeguarding and child protection legislation, and best practice guidance from the United Kingdom and COBIS. Our promise will be achieved by;

- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children;

- Teaching students how to keep safe and recognise behaviour that is unacceptable;

- Identifying and making provision for any student that has been subject to abuse;

- Ensuring that members of the Board of Governors, the Principal and all staff members understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse and know to refer all concerns to the Designated Safeguarding Lead;

- Ensuring that the Principal and any new staff members and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

The school's Designated Safeguarding Leads (DSL) are:

Primary School: Karen Ward- Deputy Head- kward@bitishschool.be

Secondary School: James Johnson- Deputy Head- jjohnson@britishschool.be

Safeguarding Governor: John Milne- john.milne@Bristolinternational.college

2. Guidance Framework

This policy has been created with due regard to the legal framework provided by the Belgian and Flanders governments, advice and good practice guidance from the U.K, and guidance from COBIS including, but not limited to, the following:

UK Guidance

- Department for Education, U.K. Govt (2022) 'Keeping Children Safe in Education'

- Department for Education, U.K. Govt (No date) 'Working Together to Safeguard Children'

Belgium Legal Framework

- The Belgium Youth Care Law (1994)

- Criminal Code of the Kingdom of Belgium (2018)

- The Flanders Decree on Youth Care (2013)

COBIS Guidance

- Child Protection Policy Guidelines (2020)

3. **Roles and responsibilities**

To ensure the effective implementation of this policy the school has clearly defined roles and responsibilities.

The **Board of Governors** has a responsibility to:

- Ensure that the school complies with its duties in response to child protection and safeguarding legislation in Belgium and best practice guidance issued in the United Kingdom

- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times;

- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the Belgium Government as part of inter-agency safeguarding procedures;

- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures;

- Ensure that staff members have due regard to relevant data protection principles which allow them to share (and withhold) personal information;

- Ensure that a member of the Governing Body is nominated to liaise with partner agencies on issues of child protection and in the event of allegations of abuse made against the Principal or another member of the Board of Governors;

- Guarantee that there are effective child protection policies and procedures in place together with a Staff Code of Conduct;

- Ensure that there is a Governor level lead responsible for safeguarding arrangements;

- Appoint a member of staff from the SLT and PLT to the role of DSL as an explicit part of the role-holder's job description;

- Ensure all relevant persons are aware of the school's safeguarding arrangements, including the Board of Governors itself, the LT, SLT, PLT and DSLs;

- Make sure that students are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum;

- ensure the school has appropriate online filtering and monitoring systems in place and regularly review their effectiveness. They will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

- Adhere to best practice by conducting appropriate preemployment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required;

- Ensure all new appointments have provided an International Child Protection Certificate or local Belgian equivalent before taking up their post.

- Ensure that staff members are appropriately trained to support students to be themselves at school, e.g., if they are LGBTQ+;

- Ensure the school has clear systems and processes in place for identifying possible mental health problems in students, including clear routes to escalate concerns and clear referral and accountability systems;

- Guarantee that volunteers are appropriately supervised;

- Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually;

- Ensure that there are procedures in place to handle allegations against members of staff or volunteers;

- Guarantee that there are procedures in place to handle students' allegations against other students;

- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of students and staff;

- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse;

- Make sure that students' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual students;

- Guarantee that there are systems in place for students to express their views and give feedback;

- Put in place appropriate safeguarding responses for students who go missing from school, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risk of their disappearance in future;

- Ensure that all members of the Board of Governors have been subject to a police check or have an international child protection certificate (ICPC)

- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.

The **Principal**, and via delegated responsibility, **Vice Principals/ Heads of School** for the **Primary** and **Secondary Schools**, have a responsibility to:

- Safeguard students' wellbeing and maintain the wider community trust in the provision at BSB;

- Ensure recruitment of new members of staff conform to the provisions set out in the Safe Recruitment protocols;

- Ensure that the policies and procedures adopted by the Board of Governors, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members;

The **DSL** has a responsibility to:

- Understand and keep up-to-date with local safeguarding arrangements;

- Make the necessary child protection referrals to appropriate internal support and outside agencies;

- Understand when they should consider calling the police;

- Liaise with the Principal to inform them of safeguarding issues and ongoing enquiries;

- Act as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies;

- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process;

- Be alert to the specific requirements of children in need of additional support including those with AEN and EAL;

- Keep detailed, accurate and secure records of concerns and referrals, to include a summary of the concern raised or referral, details on how the concern was followed up and a note of any action taken, decisions reached and the ultimate outcome;

- Secure access to resources and attend any relevant training courses;

- Encourage a culture of listening to children and taking account of their wishes and feelings;

- Work with the Governing Body to ensure the school's Child Protection and Safeguarding Policy is reviewed annually and the procedures are updated regularly;

- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals;

- Ensure the best educational outcomes by identifying at-risk students to the school and its staff, so that the relevant personnel understand each student's educational and welfare needs;

- Support teaching staff to identify the challenges that at-risk students may face and the additional academic support and adjustments they can make to support these students;

- Link with local safeguarding arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding;

- Be available at all times during school hours to discuss any safeguarding concerns. NB. The school will determine what "available" means, e.g., it may be appropriate to be accessible by electronic means such as phone or video conferencing software;

- Hold the details of the local outside agencies and liaise with them as appropriate. (see Appendix 2)

Other staff members have a responsibility to:

- Safeguard students' wellbeing and maintain community trust in the provision provided by BSB as part of their professional duties;

- Provide a safe environment in which students can learn;

- Act in accordance with school procedures with the aim of eliminating unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse;

- Maintain an attitude of 'it could happen here' where safeguarding is concerned;

- Be aware of the signs of abuse and neglect;

- Be confident of the processing conditions under relevant data protection legislation, including information which is sensitive and personal, and information that should be treated as special category data;

- Be aware of and understand the procedure to follow in the event that a child confides they are being abused or neglected;

- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child;

- Follow the school's procedure for, and approach to, preventing radicalisation;

- Challenge senior leaders over any safeguarding concerns, where necessary.

Any concerns regarding the safeguarding practices at the school will be raised with either the DSL, or if concerns relate directly to the DSL the Vice- Principal, Principal, Safeguarding Governor or Chair of the Board of Governors.

4. Safeguarding Risks for students at BSB

With regards to assessing safeguarding risks, in accordance with current statutory and non-statutory guidance set out in Section 2. Guidance Framework of this document, the school has systems in place to identify students who may be in need of extra help, or those who are suffering, or are likely to suffer significant harm.

The school uses Risk Assessments as toll to identify and monitor ongoing risk of harm to students and groups of students using the protocol set out in Appendix 3 of this policy.

There are a number of specific known safeguarding concerns that are a risk to all students.

All staff will be aware of these, the warning signs and be familiar with the procedures to deal with concerns as they arise as set out in this policy.

Please see appendix 1 for clarification and definition of key terms.

4.1 Protocol for suspected Abuse and Neglect

All staff, especially the DSL for the primary and secondary schools, will be aware that students can be at risk of abuse or exploitation at home and in situations outside their families (extra-familial harms).

All staff members will be aware of the indicators of abuse and the appropriate action to take following a student being identified as at potential risk of abuse or neglect.

When identifying students at risk of potential harm, staff members will look out for a number of indicators including, but not limited to, the following:

- Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age

- Lack of concentration and acting withdrawn

- Knowledge ahead of their age, e.g., sexual knowledge.

- Use of explicit language

- Fear of abandonment

- Depression and low self-esteem

All members of staff will be aware of the indicators of child-on-child abuse, such as those in relation to bullying, gender-based violence, sexual assaults and sexting/youth produced sexual imagery.

All staff will be aware of the necessary procedures to follow in the event of suspected abuse and neglect, including child-on-child abuse, as outlined in section 6.2 of this policy.

All staff will have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Staff will be aware that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

All staff will reassure alleged victims that they are being taken seriously and that they will be supported and kept safe. An alleged victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should an alleged victim ever be made to feel ashamed for making a report.

4.2   Protocol for Child Sexual Exploitation (CSE)

CSE does not always involve physical contact, as it can also occur online. It is also important to note that a child can be sexually exploited even if the sexual activity appears consensual.

Staff members are aware of and look for the key indicators of CSE; these are as follows:

- Having older boyfriends or girlfriends

- Suffering from sexually transmitted infections or becoming pregnant

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. The DSL will liaise with the police and any other relevant outside agency.

4.3   Protocol for Child Criminal Exploitation (CCE)

CCE may be in effect even if the criminal activity appears consensual and can happen through the use of technology.

School staff will be aware of the following indicators that a child is the victim of CCE:

- Appearing with unexplained gifts or new possessions

- Associating with other young people involved in exploitation

- Suffering from changes in emotional wellbeing

- Misusing drugs or alcohol

- Going missing for periods of time or regularly coming home late

- Regularly missing school or education or not taking part

Where CCE, or the risk of it, is suspected, staff will discuss the case with the DSL. The DSL will liaise with the police and any other relevant outside agency.

4.4   Protocol for suspected involvement of Serious Violence

Through training, all staff will be made aware of the indicators which may signal a student is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to, the following:

- Increased absence from school

- A noticeable change in friendships

- New relationships with older individuals or groups

- A significant decline in academic performance

- Signs of self-harm

- A significant change in wellbeing

- Signs of assault

- Unexplained injuries

- Unexplained gifts or new possessions

Staff will be aware of some of the most significant risk factors that could increase a student's vulnerability to becoming involved in serious violent crime. These risk factors include, but are not limited to, the following:

- A history of committing offences

- Substance abuse

- Anti-social behaviour

- Truancy

- Peers involved in crime and/or anti-social behaviour

- Being Male

Staff members who suspect a student may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

4.5 Protocol for suspected Female Genital Mutilation (FGM)

All staff will be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. If staff members are worried about someone who is at risk of FGM or who has been a victim of FGM, they should share their concerns with DSL and/or members of the Extended Leadership Team.

There are a range of potential indicators that a student may be at risk of FGM. While individually they may not indicate risk, if two or more indicators are present, this could signal a risk to the student.

Victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the student may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that may show a heightened risk of FGM include the following:

- Any girl with a mother or sister who has been subjected to FGM

- Any girl withdrawn from PSHE

Indicators that may show FGM could take place soon include the following:

- When a female family elder is visiting from a country of origin

- A girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman'

- A girl may request help from a teacher if she is aware or suspects that she is at immediate risk

- A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent

Staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

Indicators that FGM may have already taken place include the following:

- Difficulty walking, sitting or standing

- Spending longer than normal in the bathroom or toilet

- Spending long periods of time away from a classroom during the day with bladder or menstrual problems

- Prolonged or repeated absences from school followed by withdrawal or depression

- Reluctance to undergo normal medical examinations

- Asking for help, but not being explicit about the problem due to embarrassment or fear

Teachers will not examine students and so it is rare that they will see any visual evidence, but they will report to the DSL where they have a concern that an act of FGM appears to have possibly been carried out.

FGM is also included in the definition of 'honour-based' abuse (HBA), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing.

Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if appropriate.

4.6 Protocol for suspected "Forced Marriage"

As part of HBA, staff will be alert to the signs of forced marriage including, but not limited to, the following:

- Becoming anxious, depressed and emotionally withdrawn with low self-esteem

- Showing signs of mental health disorders and behaviours such as self-harm or anorexia

- Displaying a sudden decline in their educational performance, aspirations or motivation

- Regularly being absent from school

- Displaying a decline in punctuality

- An obvious family history of older siblings leaving education early and marrying early

If staff members have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of, forced marriage, they will speak to the DSL and local safeguarding procedures will be followed.

4.7 Protocol for suspected Radicalisation

Staff will be alert to changes in students' behaviour which could indicate that they may be in need of help or protection.

Indicators of an identity crisis include the following:

- Distancing themselves from their cultural/religious heritage

- Uncomfortable with their place in society

Indicators of a personal crisis include the following:

- Family tensions

- A sense of isolation

- Low self-esteem

- Disassociation from existing friendship groups

- Searching for answers to questions about identity, faith and belonging

Indicators of vulnerability through personal circumstances includes the following:

- Migration

- Local community tensions

- Events affecting their country or region of origin

- Alienation from EU values

- A sense of grievance triggered by personal experience of racism or discrimination

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Indicators of vulnerability through unmet aspirations include the following:

- Rejection of civic life

- Indicators of vulnerability through criminality

- Perceptions of injustice Feelings of failure

- Experiences of dealing with the police

- Involvement with criminal group

When making a judgement, staff will ask themselves the following questions:

- Does the student have access to extremist influences?

- Does the student access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly using Skype)?

- Is there a reason to believe that the student has been, or is likely to be, involved with extremist organisations?

- Is the student known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?

- Does the student sympathise with or support illegal/illicit groups?

- Does the student support groups with links to extremist activity?

- Has the student encountered peer, social, family or faith group rejection?

- Is there evidence of extremist ideological, political or religious influence on the student?

- Have international events in areas of conflict and civil unrest had a noticeable impact on the student?

- Has there been a significant shift in the student's outward appearance that suggests a new social, political or religious influence?

- Has the student come into conflict with family over religious beliefs, lifestyle or dress choices?

- Does the student vocally support terrorist attacks, either verbally or in their written work?

- Has the student witnessed or been the victim of racial or religious hate crimes?

- Has the student travelled for extended periods of time to international locations? •

- Has the student employed any methods to disguise their identity?

- Does the student have experience of poverty, disadvantage, discrimination or social exclusion?

- Does the student display a lack of affinity or understanding for others?

- Is the student the victim of social isolation?

- Does the student demonstrate a simplistic or flawed understanding of religion or politics?

- Does the student have insecure, conflicted or absent family relationships?

- Has the student experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?

- Is there evidence that a significant adult or other person in the student's life has extremist views or sympathies?

Critical indicators include where the student is:

- In contact with extremist recruiters.

- Articulating support for extremist causes or leaders.

- Accessing extremist websites.

- Possessing extremist literature.

- Using extremist narratives and a global ideology to explain personal disadvantage.

- Justifying the use of violence to solve societal issues.

- Joining extremist organisations

- Making significant changes to their appearance and/or behaviour.

Any member of staff who identifies such concerns, because of observed behaviour or reports of conversations, will report these to the DSL.

To provide a safe and secure place for students to explore new ideas and develop their resilience the school will:

- Provide a safe environment for debating controversial issues.

- Allow students time to explore sensitive and controversial issues.

- Provide students with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing.

- Equip students to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.

- Teach students about how democracy, government and law making/enforcement occur.

- Teach students about mutual respect and understanding for the diverse national, regional, religious and ethnic identities within Belgium and the wider European community.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms.

Any concerns over radicalisation will be discussed in the first instance with the DSL. A decision will be made by the DSL, in conjunction with the Principal or Vice Principal, about whether to talk with a child's parents. It is likely that parents will be contacted unless the school has reason to believe that the child would be placed at greater risk as a result.

4.8 Protocol for Mental Ill Health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a student has suffered, or is at risk of suffering abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional.

Staff will be encouraged to identify students whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one.

Staff who have a mental health concern about a student that is also a safeguarding concern will act in line with this policy and speak to the DSL.

The school will access a range of advice to help them identify students in need of additional mental health support, including working with the Care, Guidance and Support team and with relevant external agencies.

Where a student is suspected of having an adverse mental health condition, staff will discuss the individual case with the relevant Head of Year, Year Leader or Counsellor and, if appropriate, make a referral to the DSL. The DSL will liaise with the Care, Guidance and Support team and wider outside agencies, as appropriate.

5. Protocol for students with elevated risk of a safeguarding concern.

Some students will have an elevated risk of harm due to their individual personal circumstances. All staff will know those categories of students at greater risk and maintain a high level of vigilance for these students.

5.1 A child missing from school or education

A child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation, or radicalisation.

Staff will monitor students that go missing from the school, particularly on repeat occasions, these will be dealt with by the Head of Year (Secondary) or Year Leader (Primary) in the first instance. The Head of Year or Year Leader will liaise with the DSL and normal safeguarding procedures will be followed when necessary or appropriate.

A child that goes unexpectedly missing during the school day is at risk of harm. In the event of a child going missing during the school day, or during an authorised school activity on or off site, staff will follow the procedures set out the MEP.

5.2 Students with AEN

The school recognises that students with AEN can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect within this group of students.

Staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the student's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability;

- Students with AEN can be disproportionally impacted by things like bullying, without outwardly showing any signs;

- Communication barriers may exist, as well as difficulties in overcoming these barriers.

- Students with AEN can struggle with 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.

When managing a safeguarding issue relating to a student with AEN, the DSL will liaise with the school's AEN lead, as well as the student's family where appropriate, to ensure that the Student's needs are effectively met.

5.3 Students who are lesbian, gay, bisexual or Trans (LGBT)

The school recognises the fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, it is noted that children who are LGBT can be targeted by other children and that a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

When supporting LGBT students, the DSL, and other members of the Care, Guidance and Support Team, will give due consideration to provide a trusted adult and a safe space to share their concerns.

6. Protocols for managing concerns raised about students

To ensure the wellbeing of all students, staff will follow the appropriate protocols set out below for specific circumstances.

6.1 Recording concerns

All concerns, discussions and decisions made, and the reasons for those decisions, in regard to a student of concern, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL.

All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded on a password protected spreadsheet by the DSL. Only the DSL of each school and Principal and Vice Principals have access to this document.

Handwritten information will be kept securely in a locked cabinet in in the blue student files in the Lower Primary Office, Upper Primary Office, Head of Year office or Co-Head of Post 16 office.

6.2 Managing concerns raised around the general welfare of a student.

If a member of staff has any concern about a child's welfare, they will act on them immediately by speaking to the DSL or Vice- Principal for the appropriate school.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing.

In the event of a student disclosing information that a staff member considers a risk to the student's safety or wellbeing they will always be taken seriously, reassured, supported and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the student feels like they are being listened to and believed.

An alleged victim should not be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them.

An alleged victim should not be given the impression that they are creating a problem by reporting sexual violence or sexual harassment.

In the event of any disclosure all staff will;

- Never promise confidentiality at the initial stage;

- Only share the report with those necessary for its progression; explaining to the victim what the next steps will be and who the report will be passed to;

- Recognise that the person the child chose to disclose the information to is in a position of trust;

- Be clear about boundaries and how the report will be progressed;

- Not ask leading questions and only prompting the child with open questions;

- Wait until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure, it is important to still remain engaged and not appear distracted;

- Only recording the facts as the child presents them – not the opinions of the note taker;

- Wherever possible, manage disclosures with two staff members present (preferably with the DSL or Pastoral leaders as one of the staff members);

- If the DSL is unable to be involved in the disclosure staff will Inform the DSL, or if the DSL is unavailable a member of the Secondary or Primary Leadership Teams, immediately after the disclosure.

If a friend of a student makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it. The basic Principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be

Where there are safeguarding concerns, the school will ensure that the student's wishes are always taken into account, and that there are systems available for students to provide feedback and express their views.

All staff members, in particular the DSL, will be aware of the local arrangements in place for managing external referrals. The DSL will provide staff members with clarity and support where needed.

The school recognises the importance of proactive information sharing between professionals and other agencies in order to effectively meet students' needs and identify any need for enhanced intervention.

Any decisions about information sharing will be taken by the DSL for the relevant part of the school or by a member of the Leadership Team.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of students.

If staff members are in doubt about sharing information, they will speak to the relevant DSL for the primary and secondary school.

When making a referral to local outside agencies (See Appendix 2) information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the students involved.

The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

The school will not wait for the start or outcome of an investigation before protecting the victim and other students: this applies to criminal investigations as well as those made by the police.

At all stages of a referral process, the student will be informed of the decisions made, actions taken and reasons for doing so when appropriate.

Discussions of concerns with parents and outside agencies will only take place where this would not put the student or others at potential risk of harm.

The school will work closely with parents to ensure that the students, as well as their family, understands that the arrangements in place, such as in-school interventions, are effectively supported and know where they can access additional support.

6.3 Managing concerns about child-on-child abuse

In order to prevent child-on-child abuse and address the wider societal factors that can influence behaviour, the school will educate students about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons.

The school will also ensure that students are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons, including elements of Relationship and Sex Education, and Tutor Group sessions. Such content will be age and stage of development specific, and tackle issues such as the following:

- Healthy relationships

- Respectful behaviour

- Gender roles, stereotyping and equality

- Body confidence and self-esteem

- Prejudiced behaviour

- That sexual violence and sexual harassment is always wrong

- Addressing cultures of sexual harassment

Students will be allowed an open forum to talk about concerns about a peer's behaviour and specifically about a peer's sexual behaviour. They are taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled.

All staff will understand the importance of challenging inappropriate behaviours between peers, many of which are listed in the Appendix 1.

All staff will understand that downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

All staff understand the school's policy and procedures with regards to peer-on-peer abuse and will report any concerns immediately to the Head of Year, Year Team Leader or relevant DSL.

Any incident of child-on-child abuse will be dealt with on a case-by-case basis and the school may decide to handle through the provision set out in either the Safeguarding and Child Protection Policy, the Behaviour Management Policy and Respect Charter.

Vulnerable Groups

All staff will be made aware of the heightened vulnerability of students with AEN, who statistically are three times more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the student's SEND and will always explore indicators further.

LGBTQ+ children can be targeted by their peers. In some cases, children who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ children.

The school's response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex.

Students will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers.

Online behaviour

Online concerns regarding child-on-child abuse can be especially complicated. The school recognises that there is potential for an online incident to extend further than the school environment into the local community and for an alleged victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.

If the incident involves sexual images or videos held online, the police may be contacted, and parents informed, if they are not already aware.

Staff will not view or forward illegal images of a child unless asked to do so by the Police. If they are made aware of such an image, they will contact the DSL.

Any incidents that occur online that cause a safeguarding concern will be dealt with in line with, and with close reference to, the E-Safety Policy.

6.4 Managing disclosures regarding child-on-child sexual harassment, sexual violence, and harmful sexual activity.

During a disclosure staff will follow the guidance set out in section 6.2 of this policy.

All staff understand that sexual violence and sexual abuse can happen anywhere, and they maintain an attitude of 'it could happen here'. Staff are aware of and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college.

Immediate consideration will be given as to how to support the victim, alleged perpetrator and any other children involved.

Any decisions regarding safeguarding and supporting the alleged victim will be made by the DSL in conjunction with relevant pastoral, counselling and senior staff. In making decisions, reference should be made to the definitions of sexual assault, sexual violence or harmful sexual behaviours or sexual harassment set out in Appendix 1 of this policy in addition to the the following considerations:

- The terminology the school uses to describe the victim

- The needs and wishes of the alleged victim. Alleged victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however be balanced with the school's or college's duty and responsibilities to protect other children

- Whether the victim wishes to continue in their normal routine

- The victim will not be made to feel ashamed about making a report

- What a proportionate response looks like

- The nature of the incident;

- The ages and developmental stages of the children involved;

- Any power imbalance between the children;

- Whether the incident is a one-off or part of a pattern;

- Any ongoing risks;

- Any related issues and the wider context, such as whether there are wider environmental factors in a child's life that threaten their safety and/or welfare;

- The best interests of the child;

- The importance of understanding intra familial harms and any necessary support for siblings following incidents

- That sexual violence and sexual harassment are always unacceptable and will not be tolerated.

Alleged victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a piecemeal basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult.

Alleged victims may struggle in a normal classroom environment. Whilst it is important not to isolate the alleged victim, the alleged victim may wish to be withdrawn from lessons and activities at times. This will only happen when the alleged victim wants it to, not because it makes it easier to manage the situation.

The school will provide a physical space for alleged victims to withdraw to.

Alleged victims may require support for a long period of time and the school will be prepared to offer long-term support in liaison with relevant agencies.

Everything possible will be done to prevent the alleged victim from bullying and harassment as a result of any report they have made.

The DSL and/or senior staff will make an immediate risk and needs assessment any time there is a report of physical or sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis.

Risk assessments will consider:

- The alleged victim.

- The alleged perpetrator.

- Other children at the school, especially actions that are appropriate to protect them.

Risk assessments will be recorded (either on paper or electronically) and kept under review in accordance with the school's Data Protection Policy.

The decision of when to inform the alleged perpetrator of an allegation will be made on a case-by-case basis by the DSL, in consultation with relevant pastoral, counselling and senior staff. If an allegation is being referred to the police, the school will speak to the relevant agency to discuss informing the alleged perpetrator.

When considering the support required for an alleged perpetrator, the school will take into account:

- The terminology they use to describe the alleged perpetrator or perpetrator;

- The balance of safeguarding the victim and providing the alleged perpetrator with education and support;

- The reasons why the alleged perpetrator may have abused the victim – and the support necessary;

- Their age and developmental stage;

- What a proportionate response looks like;

- Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials.

When making a decision, advice will be taken from local welfare agencies, specialist sexual violence services and the police as appropriate.

For reports of sexual assault, sexual violence, harmful sexual behaviours or sexual harassment, whilst the school establishes the facts, the alleged perpetrator may be removed from any classes shared with the victim. The school will consider how to keep the victim and alleged perpetrator apart on school premises, and on transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator. The proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately.

In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.

The school will not wait for the outcome of an investigation before protecting the alleged victim and other children.

Where there is a criminal investigation into sexual assault or harmful sexual behaviour the alleged perpetrator will be removed from classes with the victim and potential contact on school premises and transport will be prevented.

Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the school would harm the education or welfare of the victim and potentially other students.

Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.

There are three likely outcomes when managing allegations of sexual violence or sexual harassment:

- Managing internally

- Enhanced Intervention (See Appendix 1)

- Reporting to the police

Whatever outcome is chosen, it will be underpinned by the Principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussion, decisions and reasons behind decisions will be recorded either on paper or electronically.

In some cases, e.g., one-off incidents, the school may decide to handle the incident internally through behaviour and anti-bullying policies.

The school may decide that statutory interventions are not required, but that students may benefit from **Enhanced Intervention** on the Care, Guidance and Support Pathway, as set out in the *Care, Guidance and Support Policy**, providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

*Publication pending subject to confirmation by the Board of Governors. Until publication, provision in this area is covered by the Access to Learning and linked policies.

Reports of sexual assault, sexual violence or harmful sexual behaviour may be passed on to the police – even if the alleged perpetrator is under 12 years of age. The DSL will follow the local process for referral.

Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the school to support the child with any decision they take and any appropriate specialist agencies.

Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing does not prevent the school reaching its own conclusion and imposing an appropriate penalty.

The school will make such decisions on a case-by-case basis, with the DSL and senior staff taking a leading role. The school will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police will be consulted where necessary.

The school will also consider whether circumstances make it unreasonable or irrational for the school to make a decision about what happened while an investigation is considering the same facts.

Disciplinary action and support can take place at the same time.

The school will be clear whether action taken is disciplinary, supportive or both.

The DSL and senior staff will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect the victim and their anonymity.

The DSL will be aware of local arrangements and specialist units that investigate child abuse.

In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the alleged victim as required.

If the school agrees with the decision made by local agencies, they will consider the use of other support mechanisms such as **Enhanced Intervention** via pastoral and counselling support and possible further external specialist support.

The school and parents will ensure that the alleged victim and alleged perpetrator remain protected from bullying and harassment (including online behaviours).

Where an alleged perpetrator is found not guilty or a case is classed as requiring "no further action", the school will offer support to the victim and alleged perpetrator for as long as is necessary. If the perpetrator remains in the same school as the victim, the school will set out clear expectations regarding the perpetrator, including their behaviour and any restrictions deemed reasonable and proportionate with regards to the alleged perpetrator's timetable.

The alleged victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The school will discuss decisions with the alleged victim and offer support.

The alleged perpetrator is also likely to require ongoing support, as they have also been through a difficult and upsetting experience.

In most sexual violence and harmful sexual behaviour cases, the school will work with the parents of both the victim and alleged perpetrator alongside all relevant outside agencies. For cases of sexual harassment, these decisions will be made on a case-by-case basis.

The school will meet the victim's parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.

Schools will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made available will be discussed. The DSL or a deputy will attend such meetings, with other senior staff and agencies invited as necessary.

The Safeguarding and Child Protection Policy which clearly sets out how the school will handle reports of sexual violence and how victims and alleged perpetrators will be supported is available to parents on the school's website. A hard copy is available on request.

Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support.

It is likely that children will "take sides" following a report, and the school will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.

The school will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity. As part of the school's risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both a victim and alleged perpetrator. Schools will consider any additional support that can be put in place.

If a report or disclosure is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help.

If a report or disclosure is shown to be deliberately invented or malicious the school will consider whether any disciplinary action is appropriate against the individual who made it as per our behaviour policy.

6.5 Protocol for Managing allegations about staff members

If a staff member has concerns about another member of staff (including supply staff and volunteers) it will be raised with the Principal, Vice Principal or the DSL.

If the concern is with regards to the Principal, it will be referred to the Chair of the BSB board of Governors.

Any allegations of abuse made against staff members, including those that meet the "harms test", will be dealt with in accordance with the school's Complaints Policy.

The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

When an allegation is made, an investigation will be carried out to gather enough evidence to establish whether it has a foundation as set out in the CCC policy.

If a case manager is concerned about the welfare of other children in the community following an allegation about a member of staff, they may report this concern to the relevant local authorities.

7. Communication and confidentiality

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies.

The DSL will consider the following when making confidentiality decisions:

- Parents will usually be informed of a safeguarding concern unless that action will place the victim at greater risk.

- If a child is at risk of harm, is in immediate danger or has been harmed, a referral will be made to other local agencies, including the police, as appropriate.

- Rape, assault by penetration and sexual assaults are crimes – reports about such crimes may be passed to the police.

Where there is an allegation or incident of sexual abuse or violence the school will consult its policy and agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents.

Concerns and/or allegations will only be reported to those necessary to ensure appropriate support and reporting has taken place and will only be shared amongst staff members and with external agencies on a need-to-know basis.

During disclosure of a concern by a student, staff members will not promise the student confidentiality and will ensure that they are aware of what information will be shared, with whom and why. Before doing so, the DSL will weigh the student's wishes against their duty to protect the victim and others.

Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the students involved. Discussions with parents will not take place where they could potentially put a student at risk of harm.

Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the students involved in the case.

Where a student is leaving the school, the DSL will consider whether it is appropriate to share any information with the student's new provider that will allow the new provider to support the student and arrange appropriate support for their arrival.

8. Managing safeguarding concerns outside of the school day

The school recognises that its responsibility for the child protection and safeguarding of its students extends beyond the confines of the school site and the timings of the school day to activities such as trips and visits linked to school.

8.1 Contextual safeguarding

Safeguarding incidents can occur outside of school and can be associated with outside factors. School staff, particularly the DSL, will always consider the context of incidents – this is known as contextual safeguarding.

Assessment of students' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.

The school will provide as much contextual information as possible when making referrals to outside agencies.

Where an alleged incident took place away from the school or online but involved students from the school, the school's responsibility to safeguard students remains the same.

8.2 Sports clubs, extracurricular and enrichment activities

Clubs and extracurricular activities organised by the school and run by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard students and adhere to local safeguarding arrangements.

Staff, including paid and volunteers, running sports clubs and extracurricular activities are aware of their safeguarding responsibilities and promote the welfare of students. This is covered during the start of each year; For example, all coaches attend a sport induction programme.

Staff, including paid employees and volunteers, understand how they should respond to safeguarding and child protection concerns and how to make a referral to the Primary and/or Secondary DSL.

8.3 Homestay exchange visits

In the event of a homestay exchange visit in Belgium or another country the school will:

- liaise with partner schools to discuss and agree the arrangements in place for the visit.

- consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of Belgium.

- use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange.

- be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

8.4 Privately arranged homestays

Where a parent or student arranges their own homestay, this is a private arrangement and the school is not the regulated activity provider. However, this requires a letter of approval from the Faculty Leader and a waiver consent form signed by the student's parent

9. Protocol for mobile telephone and camera safety

Staff members

All staff will understand the need to ensure appropriate use of mobile technology in the workplace and ensure they model the best professional conduct at all times.

All staff:

- will only use personal mobile phones on school premises outside of working hours when there are no students are present or in the staff areas during breaks and non-contact time.

- will use a school mobile phone on a trip or residential stay for emergencies and contacting parents.

- will use their professional judgement in regard to the use of mobile technology in emergency situations at work, including emergencies related to work and home life.

- will report inappropriate messages or images related to the students or activities in school using mobile devices.

- will report any concerns about another staff member's or student's use of mobile phones to the DSL.

- will ensure photographs and videos of students will be carefully planned before any activity with particular regard to consent and adhering to the school's privacy notice and Data Protection Policy.

- will respond positively to the expectations that staff should be willing to share the contents of their mobile technology if there is a reasonable expectation that there are images relating students or school activities.

- will ensure all students on the photograph list will not be included in published (internally or externally) photographs or videos. All staff can access this list.

Students

It is important that all students understand how to use mobile technology safely and appropriately in a professional environment.

Students;

- will not use mobile devices to take images or videos of students or staff in any circumstances.

- will not share inappropriate messages or images related to the students or activities in school using mobile devices.

- will allow the DSL or senior member of staff, in the event of an allegation of inappropriate content on a student's mobile telephone, to look at the contents of the telephone.

The school recognises Belgium law in regard to a student's right to privacy over the age of 12. However, the school considers that its responsibility to protect and safeguard a child outweighs this right to privacy.

If a student refuses a reasonable request to share the contents of their telephone then the DSP and/or senior staff will take a decision to either contact the parents or refer the student to outside agencies which may include the police.

10. Online and internet safety in school

As part of a broad and balanced curriculum, all students will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of the following:

• Student attitudes and behaviours which may indicate they are at risk of potential harm online

• The procedure to follow when they have a concern regarding a student's online activity

In addition, the school will;

• ensure appropriate filters and appropriate monitoring systems are in place. Children should not be able to access harmful or inappropriate material from the school's IT system.

• be careful that "over blocking" can lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

• ensure, where possible, ICT technicians review and authorise any downloadable apps or programmes that are to be used in school by staff and students.

• ensure the use of mobile phones by students is monitored by the school.

Where students need to learn online from home, the school will support them to do so safely in line with the Continuous Learning Provision Guidance.

11. Training and development

Staff members will undergo safeguarding and child protection training at induction, which will be regularly updated or whenever there is a change in legislation.

The induction training will cover:

• The Child Protection and Safeguarding Policy

• The identity of the DSL and any deputies

• The role of the DSL and deputy DSLs

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Any changes to this policy will be communicated to staff.

All staff members will undergo regular Child Protection and Safeguarding training at least every three years. The training may include:

• updates to safeguarding and chid protection standards and expectations in International Schools

• Updates to Child protection and safeguarding legislation in Belgium

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

The DSLs will undergo updated child protection training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up-to-date with any developments relevant to their role.

The DSL and their deputy(s) will undergo online safety training to help them recognise the additional risks that students with SEND face online, for example, from online bullying, grooming and radicalisation, to ensure they have the capability to support students with SEND to stay safe online.

Members of the Governing Body will receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding. Their training will be regularly updated.

12. Monitoring and review

This policy is reviewed annually by the DSL, the Principal and the Curriculum and Learning Sub-Group of the Board of Governors.

Any changes made to this policy by the DSL and Principal will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme and ongoing Professional Learning.

The school will keep relevant policies, processes, and curriculum under constant review to protect all their children. Reports of sexual violence and/or harassment, bullying or mental ill health (especially where there is evidence of patterns of behaviour) may point to environmental and or systemic problems that could and should be addressed by updating relevant policies, processes, or relevant parts of the curriculum.

Where possible, the school will share any emerging trends or patterns of behaviour with safeguarding partners.

13. Related Policies

This policy should be read with close reference to, and alongside, other key policies including

- Recruitment Policy
- IT Acceptable Use Agreement
- Major Emergency Plan
- GDPR Policy
- Trips and Visits Policy
- Behaviour Policy
- Complaints Policy
- Work Council Regulations

Appendix 1- <u>Definitions and explanatory notes</u>

"Safeguarding and protecting the welfare of children"

For the purposes of this policy, "safeguarding and protecting the welfare of children" is defined as:

- Protecting students from maltreatment.

- Preventing the impairment of students' mental health or development.

- Ensuring that students grow up in circumstances consistent with the provision of safe and effective care.

- Taking action to enable all students to have the best outcomes

For the purposes of this policy the school defines and clarifies terms and definitions related to the safety and wellbeing of children in school in line with advice and guidance set out in 'Keeping children safe in education' (Department of Education, U.K. Government, 2020).

Abuse: A form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or, more rarely, by others, e.g., via the internet.

Physical abuse: A form of abuse which may involve actions such as hitting, throwing, burning, drowning and poisoning, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: A form of abuse which involves the emotional maltreatment of a child to cause severe and adverse effects on the child's emotional development. This may involve telling a child they are worthless, unloved, inadequate, not giving them the opportunities to express their views, deliberately silencing them, or often making them feel as though they are in danger.

Sexual abuse: A form of abuse which involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, and whether or not the child is aware of what is happening. This may involve physical assault, such as penetrative assault and touching, or non-penetrative actions, such as looking at sexual images or encouraging children to behave in inappropriate ways.

Neglect: A form of abuse which involves the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve providing inadequate food, clothing or shelter, or the inability to protect a child from physical or emotional harm or ensure access to appropriate medical treatment.

Furthermore, the school respects and accepts the definition of child abuse as set out by the Flanders Decree of Integrated Youth Care (2013) as being

"Any form of physical, psychological or sexual violence against minors, either actively by the harmful acting, either passively by a serious neglecting by the parents or by any other person with respect to whom the minor is in a relationship of dependency".

"Child Sexual Exploitation"

For the purposes of this policy, **"Child Sexual Exploitation"** is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity, for either, or both, of the following reasons:

- In exchange for something the victim needs or wants

- For the financial advantage or increased status of the perpetrator or facilitator

"Child Sexual Exploitation" may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media. 14 38. CSE can affect any child, who has been coerced into engaging in sexual activities.

This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g.; they believe they are in a genuine romantic relationship.

"Child Criminal Exploitation"

For the purposes of this policy, **"Child Criminal Exploitation"** is defined as: where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, for any, or all, of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money, working in cannabis factories, shoplifting or pickpocketing.

They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced.

They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

"Serious Violence"

For the purposes of this policy, **"Serious Violence"** is defined as an action taken by a child who has been forced or coerced into causing significant harm, or the threat of significant harm, to another individual as a result of **"Child Criminal Exploitation".**

"Female Genital Mutiliation (FGM)"

For the purposes of this policy, "**Female Genital Mutilation (FGM)"** is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs.

"Forced Marriage"

For the purpose of this policy, a **"Forced Marriage"** is defined as a marriage that is 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 the marriage.

"Radicalisation"

For the purpose of this policy, we have used the following definitions for safeguarding concerns linked to **"Radicalisation"**:

- "**Radicalisation**" refers to the process by which a person comes to support terrorism and extremist ideologies;

- "**Extremism**" refers to the vocal or active opposition to fundamental European Union values, e.g., individual liberty and the rule of law;

- **"Terrorism**" refers to an action that endangers or causes serious violence to a person or people, property, or electronic system, which is designed to influence the government, intimidate the public, or advance a cause.

"Enhanced Intervention"

Enhanced Intervention forms part of the Care Guidance and Support Pathway and enables the school to provide support as soon as a problem emerges, at any point in a student's journey through BSB..

Any student may benefit from Enhanced Intervention, but staff will be especially alert to the potential need for Enhanced Intervention for students who:

- Have AEN;

- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;

- Are frequently missing/going missing from home;

- Misuse drugs or alcohol;

- Are at risk of modern slavery, trafficking or exploitation;

- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse;

- Show early signs of abuse and/or neglect;

- Are at risk of being radicalised or exploited;

The school can provide access to a counsellor or mentor for students with specific identified needs and will make use of the school nurses.

The school will raise awareness of issues such as eating disorders, self-harm, E-safety, FGM, CSE, radicalisation and healthy relationships through curriculum lessons, assemblies and speakers from other agencies.

The school will work with professionals as required to understand why the abuse took place and provide a high level of support to help the student understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.

"Harmful Sexual Behaviour"

For the purposes of this policy, the term **"harmful sexual behaviour"** includes, but is not limited to, the following actions:

- Using sexually explicit words and phrases

- Inappropriate touching

- Sexual violence or threats

- Full penetrative sex with other children or adults

In accordance with the 2018 guidance issues by the UK government 'Sexual violence and sexual harassment between children in schools and colleges' (2018), and for the purposes of this policy, the term **"'sexual harassment"** is used within this policy to describe any unwanted conduct of a sexual nature, both online or offline, which violates a child's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.

"Sexual Violence"

For the purposes of this policy, the term **"sexual violence"** encompasses the definitions provided in the United Kingdom Sexual Offences Act 2003, including those pertaining to rape, assault by penetration and sexual assault.

For the purposes of this policy, "sexual violence" refers to the three following offences:

> • **Rape:** A person (A) commits an offence of rape if he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

> • **Assault by Penetration:** A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

> • **Sexual Assault:** A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

"Sexual harassment"

For the purposes of this policy, "sexual harassment" refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a student's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

Sexual harassment includes:

> • Sexual comments.

> • Sexual "jokes" and taunting.

> • Physical behaviour, such as deliberately brushing against another student.

> • Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

"Sexting"

For the purposes of this policy sexting is used to describe the sending of sexually explicit digital images, videos, text messages, or emails, usually by cell phone.

"Up skirting"

For the purposes of this policy, **"up skirting"** refers to the act of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks (with or without clothing). Despite the name, anyone (including both students and teachers), and any gender, can be a victim of upskirting.

In Belgium it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose.

A "specified purpose" is namely:

- Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim's genitals, buttocks or underwear).

- To humiliate, distress or alarm the victim.

"Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion activated camera.

Up skirting will not be tolerated by the school. Any incidents of up skirting will be reported to the DSL who will then decide, in collaboration with senior staff, on the next steps to take, which may include police involvement.

"Child-on-child abuse".

All staff will be aware that child-on-child abuse can be manifested in many different ways, including

For the purpose of this policy, "**child-on-child**" abuse is defined as abuse between children. This can include, but is not limited to the following:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);

- Abuse in intimate personal relationships between children;

- 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 nudes and semi nudes 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; and

- 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).

"Harms test"

For the purposes of this policy, the "**harms test**" refers to a situation where a person would pose a risk of harm if they continued to work in regular or close contact with students in their present position, or in any capacity.

Appendix 2- <u>Key local agencies and contact details</u>

<u>VCLB</u>

Karel van Lotharingenstraat 5,

Leuven

 3000

Email: info@vclbleuven.be

Tel: 016 282400

<u>Vertrouwenscentrum Kindermishandeling</u>

Justus Lipsiustraat 71

Leuven

3000

Email: info@vkvlaamsbrabant.be

Tel: 016 301730

<u>Lokale Politie</u>

Police station Tervuren

Markt 7

Tervuren

3080

Email: pz.vodi.onthaal@police.belgium.eu

Tel: 02 6763000

Appendix 3- <u>Protocol for the use of Safeguarding and Child Protection Risk Assessments</u>

A risk assessment in the context of BSB is a careful examination of what could cause harm to a student's welfare and what appropriate mitigation measures should be put in place to ensure the school has taken adequate precautions for a student's safety and wellbeing.

The purpose of a risk assessment is not to generate paperwork, but to identify sensible measures to control risks that are most likely to occur and/or will cause harm.

Assessing risk is implicit in all Safeguarding and Child Protection activities undertaken across the school. As a school we recognise that a risk assessment can take a number of different forms.

A risk assessment may be informal and form a professional discussion between colleagues where a decision is recorded by the DSL or delegated Key Worker. A risk assessment for more complex and serious concerns may also be a more formal process where actions are recorded in an action plan.

When planning a risk assessment in this context, all staff recognise that:

- a welfare issue is anything that may harm a student including cyber-bullying or abuse

- any risk, however slight, that a student may be harmed must be assessed in full.

Staff should use a 5 step process in planning for any risk assessments. Although it is recognised as good practice to complete all 5 steps, depending on the context of the students and the issues they face, it may be necessary to complete a fewer number of appropriate steps if there is a clear rationale for doing so.

Step 1: Identify the issue

- Consideration should be given to how students could be harmed. This will generally be set out in the concern raised about a student's welfare.

- If the issue is associated with a member of staff consider the level of concern and whether it meets the "harms threshold".

Step 2: Decide who might be harmed and how

- Identify individual students or groups who might be harmed and how they might be harmed by the concern raised.

- Consider seeking early advice from outside agencies.

Step 3: Evaluate the risks and decide on mitigations

- Decide what to do about the risks. The extent of the risk will depend on the likelihood of the harm occurring and the severity of the harm. Consideration should be given to

  - The effectiveness of mitigations should be considered and the extent of risk remaining assessed.

- When deciding if precautions are acceptable, the assessor should take into account the requirement to do all that is "reasonably practicable" to protect people from harm.
- Compare what you currently do with what is required or permissible by law or is accepted good practice.

- If there is a concern that a risk persists to the wellbeing of a student further appropriate mitigations should be planned for and executed.

Step 4: Recording findings and implement them

Any further mitigations planned for should be recorded in a Safeguarding Risk Assessment Action Plan (SRAAP). A key worker should be identified as responsible for leading and reviewing the SRAAP.

There is no prescribed format but the record to allow flexibility to manage diverse safeguarding issues. However, the SRAAP should be simple and focused on mitigation measures and steps the school proposes to manage the risk. The DSL should be consulted on an appropriate format on a case-by-case basis and could include

- The name of key person responsible for completing the action
- Any interim measures to reduce risk in the short term
- The target date for completion
- Where appropriate, confirmation that the action has been completed
- A Reassessment of the level of risk following completion of the action.

Step 5: Review your risk assessment and update if necessary

Depending on the context of each SRAAP, the nominated Key Worker will regularly review actions for the student(s) identified and across the school and regularly monitor the efficacy of the measures in place or as required.

Appendix 4- <u>BSB Safeguarding Guidelines for Staff Interactions with Students</u>

Our Professional Practice	Guidance notes
We recognise that we work with students in a privileged position of trust.	This document is intended to support colleagues and volunteers and should be read in conjunction with the Code of Conduct, the Safeguarding Policy and the Guiding Statements. Any questions related to the context of these guidelines should be referred to the DSLs (James Johnson and Karen Ward or a member of LT).
A. We recognise it is sometimes necessary, and occasionally preferable, to work closely on a 1:1 basis with our students	At BSB all adults treat students with respect and try, as far as possible during regular school activities, not to be isolated with a student. Where this is not possible, for example in an instrumental music lesson, sports coaching lesson or 1:1 mentoring session it is good practice to ensure that others are within view or within earshot. If there are no windows in the door, or clear view of the room from outside, the door should be left open. Where possible, it is good practice to ensure a gap or barrier is maintained between an adult and child at all times. Any physical contact should be the minimum required for care, instruction or restraint. Where it is appropriate for a student to see the school counsellor, member of the medical staff or any other legitimate situation where an adult maybe working 1:1 with a student, all adults need to ensure that their behaviour does not inadvertently lay them open to allegations inappropriate behaviour. Adults to only use the designated adult toilets.

B. We recognise that it is sometimes necessary and appropriate to make physical contact with a student	• **General physical contact**
	At BSB we recognise there are occasions when it is entirely appropriate and proper for adults to have physical contact with students.
	However, it is crucial that we only do so in ways that is directly appropriate to our professional role and should not have unnecessary physical contact with students. It is vital that adults working or volunteering within our community should exercise their professional judgement at all times. This decision should be based on the principle that any physical contact should be the minimum required for care, instruction or restraint.
	Please endeavour to exercise cultural sensitivity as there can be different interpretations of the meaning of certain contact/gestures depending on the culture of students.
	• **Physical Restraint in an emergency**
	Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself/herself or on another, and then only as an absolute **last resort** when all efforts to defuse or resolve the situation have failed. Another adult should, if possible, be present to act as a witness.
	All incidents of the use of physical restraint should be recorded in writing and reported immediately to the DSL/Vice Principal/Principal who will decide what to do next. Where this relates to the school's Early Years setting, parents will be informed of any physical restraint used on their child the same day or as soon as reasonably practicable.
	• **Physical Education, Enrichment and other practical activities requiring physical contact**
	We recognise that some adults, for example those who teach PE and Enrichment activities, or who offer music tuition, will, on occasions, have to initiate physical contact in order to support a student so they can

	perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the student's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. All adults working within our community should remain sensitive to any discomfort expressed verbally or non-verbally by the child.	
C. We recognise it is important to make professional judgements about the safest way to transport students for the safety of both adults and students in our care.	At BSB only in exceptional circumstances should an adult working or volunteering within the school community to give a lift to a student alone. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one adult in addition to the driver. If there are exceptional or emergency circumstances that make unaccompanied transporting of students unavoidable, the journey should be made known to a member of ELT or the most senior member of staff available. Journeys should be made only with the permission of the parent and student. We recognise that at BSB members of staff and volunteers are friends with neighbours and others whose children also attend BSB. Lifts in these contexts are part of that network. Again, lifts should only be with parent permission.	
D. We recognise our moral and ethical duty regarding confidentiality for students who may disclose a danger to themselves or others.	At BSB under no circumstances should adults working or volunteering within our community ever give absolute guarantees of confidentiality to students or adults in any circumstances.	
E. We recognise that we live in a world informed	• At BSB, to keep all adults and students who are working or volunteering within our community safe, personal mobile phones are	

by the instant availability and use of technology, and judgement needs to be exercised about the safe use of technology.	used on the school premises only outside of working hours when there are no students present or in the staff areas during non-contact time. Any adults working or volunteering in our community should use only a registered school mobile phone on a trip or residential stay for emergencies and contacting parents. Additionally, only a registered school mobile phone should be used if it is deemed **absolutely necessary** for an adult to have a contact number for a student. Any student numbers will be deleted from the school mobile phone at the end of the activity. • All adults on the school site, or during school activities, should ensure photographs and videos of students will be carefully planned before any activity with particular regard given to consent, adhering to the school's privacy notice and Data Protection Policy. Ensure that any students on the no photograph list are not included in published photographs or videos.
F. We recognise that what we say and how we say it can have an effect on students.	• At BSB all adults treat students with respect and are careful not to say anything that could cause distress or offense to a student. We endeavour not to say things that generalise behaviours by for example gender, race or sexuality. For example when commenting on the clothing of girls that doesn't meet the dress code.