



European School
The Hague
Rijnlands Lyceum

European School The Hague

Safeguarding & Child Protection Policy

Safeguarding & Child Protection Policy 2024-2025

European School The Hague

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1. Introduction

This Safeguarding and Child Protection Policy establishes a comprehensive framework to protect children and young people from all forms of harm, with specific emphasis on both proactive safeguarding practices and responsive child protection measures in line with Dutch law and European Schools policy.

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This policy is part of ESH's overarching approach to well-being, complementing the Positive Behaviour, Drug, Educational Inclusion and Learning Support and Anti-Bullying policies. It aims to empower staff, students, and the wider school community to recognize, report, and respond to child protection concerns effectively.

Furthermore, this policy incorporates the **Pupils' Well-Being Policy Framework of the European Schools**, ensuring that child protection measures align with the European Schools' system-level policies while also respecting national Dutch legislation.

1.2. Important definitions

Safeguarding: Safeguarding refers to the proactive measures and policies put in place to protect children and vulnerable individuals from harm, abuse, neglect, and exploitation. It involves creating a safe environment, promoting well-being, and ensuring that every child has the opportunity to thrive safely.

Child Protection: Child protection is a specific part of safeguarding that focuses on identifying and responding to situations where a child is at risk of or is experiencing abuse or neglect. It involves taking immediate and appropriate action to ensure the child's safety and support their recovery.

While safeguarding covers preventative measures, child protection refers to the urgent response when a child is suspected to be at risk. Both elements are inseparable in creating a safe school environment.

Meldcode Huiselijk Geweld en Kindermishandeling: The *Meldcode* is a Dutch national reporting protocol used by professionals (such as teachers, doctors, and social workers) when they suspect domestic violence or child abuse. It consists of five structured steps to help assess the situation, ensure safety, and determine whether a report to *Veilig Thuis* (Safe at Home) is necessary.

Designated Safeguarding Lead (DSL): The Designated Safeguarding Lead is a trained professional within an organization (typically in a school or childcare setting) responsible for overseeing all safeguarding and child protection concerns. The DSL ensures that procedures are followed correctly and acts as the main point of contact for external agencies like child protection services.

Veilig Thuis: *Veilig Thuis* (Safe at Home) is the official Dutch advice and reporting center for domestic violence and child abuse/neglect. Anyone, including professionals and citizens, can contact *Veilig Thuis* for advice, support, or to make a report when there are concerns about abuse or unsafe situations in the home.

2. Legal and Policy Framework

This policy aligns with:

- **Dutch Law:** *Wet Meldcode Huiselijk Geweld en Kindermishandeling*.
- **European Regulations:** European Schools General Rules.
- **Pupils' Well-Being Policy Framework of the European Schools.**
- **Internal European School of The Hague Policies**

ESH uses EDUkey from TES as the designated safeguarding and reporting system. All safeguarding concerns and follow up must be recorded in EDUkey to ensure compliance and consistency.

Schools in the Netherlands have both a duty of care and a legal obligation to protect student privacy. While parents of students under 16 are generally entitled to information about their child's progress and well-being, they do not automatically have access to personal conversations or sensitive disclosures, particularly when sharing such information might damage the trust between a student and school staff.

As students mature, their right to privacy increases. From the age of 12, a student's opinion must be taken into account when deciding whether to share information with parents. From age 16, students have the legal right to decide whether information is shared, and from 18, they are considered fully autonomous adults under Dutch law. In all cases, exceptions apply if there are serious safeguarding concerns or risks to safety.

When deciding whether to share or withhold information, especially in situations involving risk, schools must ensure that these decisions are carefully considered, documented, and discussed with the Designated Safeguarding Lead (DSL) or the safeguarding team.

At ESH we handle all personal data in line with European GDPR regulations. You can find more details in our [privacy statement](#).

3. Safeguarding Roles and Responsibilities

3.1. Designated Safeguarding Leads (DSLs)

- Oversee safeguarding practices and compliance with the Meldcode and European Schools framework.
- Coordinate with staff, mentors, team leaders, and external agencies as needed.
- Review all safeguarding reports in EDUkey and ensure proper follow-up.
- Provide guidance and training to staff on safeguarding protocols and child protection measures.
- Work closely with school leadership to assess safeguarding risks and improve preventive measures.
- Ensure all safeguarding actions align with both **Dutch law and European Schools regulations**.

3.2. Senior Management (Director, Head of School, Head of Operations)

- Provide strategic oversight and accountability for safeguarding at the institutional level.
- Ensure the school meets legal and policy requirements
- Approve and review whole-school safeguarding policies, in collaboration with the Team leader Pastoral Care.
- Attend safeguarding-related meetings when appropriate (e.g. parent meetings, reintegration, multi-disciplinary meetings).
- Engage with the board and external agencies in serious safeguarding matters or escalations.
- Promote a safeguarding-first culture through leadership modelling, decision-making, and school priorities.

3.3. Team leader Pastoral Care / Head DSL

- Lead the designated safeguarding team.
- Develop, maintain, and implement safeguarding and child protection policies.
- Advising staff and leadership on concerns, law, and best practice.
- Attend safeguarding-related meetings when appropriate (e.g. parent meetings, reintegration, multi-disciplinary meetings).
- Coordinate with external partners (e.g. social services, mental health, police, Veilig Thuis).
- Monitor and analyse safeguarding trends and student welfare data, reporting to SMT and informing improvement.

- Oversee staff safeguarding training, including annual refreshers and induction for new staff.

3.4. Middle Management (Team leaders)

- Be alert to student welfare concerns and refer them promptly to the DSL team.
- Foster safe, supportive environments in year groups.
- Follow safeguarding procedures and record concerns accurately and securely.
- Support pastoral or safeguarding plans for students in their care.
- Attend safeguarding-related meetings when appropriate (e.g. parent meetings, reintegration, multi-disciplinary meetings).
- Team leaders are responsible for addressing instances where staff within their line do not adhere to safeguarding policies or the code of conduct.

3.5. Mentors

- Support their mentees by building trusting, respectful relationships and acting as a first line of support in both academic and personal matters.
- Foster a safe, inclusive, and respectful classroom environment, where all students feel seen, heard, and valued.
- Engage in conversations with parents or external professionals when appropriate, in collaboration with the safeguarding team or school leadership.
- Stay informed about any safeguarding concerns involving their mentees by reading and, where relevant, contributing to safeguarding reports or documentation.
- Report any safeguarding concerns promptly to the Designated Safeguarding Lead (DSL), in line with school policy.

3.6. Staff and Teachers

- Participate in mandatory annual training, including the AUGEO module and in-house workshops.
- Be vigilant in recognizing signs of abuse, neglect, or harm.
- Record all concerns in EDUkey and follow the reporting protocol.
- Support students by fostering a safe, trusting school environment.
- Engage in discussions and interventions when concerns arise, ensuring swift action to safeguard students.
- Collaborate with the DSLs in ensuring compliance with the Meldcode Huiselijk Geweld en Kindermishandeling.

3.7. Students and Parents

- Students are encouraged to speak up about concerns with mentors or trusted staff members.
- Students join assemblies where information about safeguarding and reporting is shared.
- Parents are informed about safeguarding and child-protection practices and encouraged to report any concerns to the school.
- Parents should communicate changes in their child's behaviour or well-being with the mentor for early intervention.
- Both students and parents should understand their rights and responsibilities under Dutch law and the European Schools framework.

3.8. Safeguarding Code of Behaviour

Every member of our community plays a crucial role in promoting social safety and maintaining professional boundaries. The expectations for staff behaviour are listed below:

- Staff members actively promote a socially safe environment for their students.
- Staff members are always aware of their role as models for students.
- Staff members do not exploit the dependency inherent in their professional role.
- Staff members address inappropriate behaviour from students, parents, and colleagues in a respectful and collaborative manner.
- Staff members handle confidential information with discretion.
- Staff members are familiar with and adhere to existing protocols, agreements, legal regulations, and the complaints procedure.
- Staff members do not seek private contact with students.
- Staff must not take photos of students using personal devices, unless for school-related purposes (e.g. newsletters or projects); such photos must be uploaded to the school drive and then deleted from the personal device.
- Staff must not accept friend or follow requests from students on personal social media accounts, in order to maintain professional boundaries.
- Staff members only engage in physical contact with students when functionally necessary and always respect students' personal boundaries.
- Staff members avoid one-on-one situations with students whenever possible. This means they ensure visibility to others at all times by adhering to a visibility/ open-door policy and/or four-eyes approach.
- Online communication between staff members and students or parents is strictly school-related, professional, and conducted in proper and respectful language.

- Staff members do not engage in any form of intimacy with students, whether in writing, images, gestures, or physical contact.
- Staff members do not make sexually suggestive, racist, or discriminatory jokes or remarks.
- Staff members ensure that no sexually suggestive, racist, or discriminatory posters, drawings, or other materials are displayed in school that could be offensive.
- Staff members do not engage in any intimate or sexual activity with students.
- Staff members do not enter into romantic relationships with students.
- Staff members clearly establish their professional boundaries if a student attempts to initiate intimacy.
- If a staff member suspects a safeguarding offense involving another staff member and a student, they must report this to the school management and the safeguarding reporting system.
- If a staff member becomes aware of a criminal offense, they must report this to the school management and the safeguarding reporting system.

4. Reporting and Responding to Concerns

4.1. *The Meldcode Framework and its Application in ESH*

The *Meldcode Huiselijk Geweld en Kindermishandeling* is a legally required reporting code designed to guide professionals in identifying and reporting concerns related to domestic violence and child abuse. The five-step process includes:

1. Identifying signals of abuse and gathering relevant information.
2. Consulting with a Designated Safeguarding Lead (DSL) or external experts.
3. Engaging with the student or family to assess the situation where appropriate.
4. Determining the severity and possible need for external reporting.
5. Taking action, including reporting to Veilig Thuis or other agencies if necessary.

Within ESH, this process ensures that safeguarding concerns are handled systematically, prioritizing the safety of students while fulfilling legal obligations. The school's DSLs act as the first point of contact and guide staff through this process.

Additionally, the European Schools Pupils' Well-Being Framework outlines a multi-tiered safeguarding approach that supports school-wide well-being, complementing Dutch national requirements.

4.2. *Recognizing Signs of Abuse*

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a student by inflicting harm or by failing to act to prevent harm. Students may be abused in the family or in an institutional or community setting by those known to them or by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. Any student in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "It could happen here".

There are a number of specific safeguarding concerns that we recognize our students may experience. Further information regarding the categories of abuse; physical, emotional, sexual and neglect, and indicators that a student may be being abused can be found below.

A. Physical abuse:

- Inflicting physical injury on a child by other than accidental means, causing skin bruising, burns, disfigurement, impairment of physical or emotional health, or loss or impairment of any bodily function, death; and/or
- Creating a substantial risk of physical harm to a child's bodily functioning; and/or
- Committing acts that are cruel or inhumane regardless of observable injury. Such acts may include, but are not limited to, instances of extreme discipline demonstrating a disregard of a child's pain and/or mental suffering; and/or
- Assaulting or criminally mistreating a child as defined by either the criminal code or school policy; and/or
- Engaging in actions or omissions resulting in injury to, or creating a substantial risk to the physical or mental health or development of a child; and/or
- Failing to take reasonable steps to prevent the occurrence of any of the above

Possible indicators:

- Unexplained bruises and welts on any part of the body
- Bruises of different ages (various colours)
- Injuries reflecting shape of article used (electric cord, belt, buckle, ping pong paddle, hand)
- Injuries that regularly appear after absence or vacation
- Unexplained burns, especially to soles, palms, back, or buttocks
- Burns with a pattern from an electric burner, iron, or cigarette
- Rope burns on arms, legs, neck, or torso
- Injuries inconsistent with information offered by the child
- Immersion burns with a distinct boundary line
- Unexplained lacerations, abrasions, or fractures

B. Neglect:

Neglect is the failure to provide for a child's basic physical, emotional, medical, or psychological needs within their home environment. This can include physical neglect, such as inadequate food, shelter, or supervision—including leaving a child unsupervised for extended periods or without proper guardianship. Medical neglect involves not seeking necessary medical or mental health treatment for the child. Emotional neglect may manifest as persistent inattention to a child's emotional needs, lack of psychological care, or allowing substance use. This can also include verbal humiliation, refusal to acknowledge the child's presence, unwarranted invasions of privacy, or exposure to violent threats. In some cases, neglect may occur in affluent families, where children may have access to material possessions and resources, but experience emotional absence from parents, lack of parental involvement in school or daily life, and a withdrawal of responsibility or even hostility from caregivers.

Possible indicators:

- Child is unwashed or hungry
- Parents are uninterested in child's academic performance or apply unreasonable pressure on the child to perform
- Parents do not respond to repeated communications from the school
- Child does not want to go home
- Both parents or legal guardians are absent for an unreasonably long period of time
- Parents cannot be reached in the case of an emergency
- obesity or other malnourishment
- Frequent absenteeism
- lack of behavioural and social parameters

C. Sexual abuse:

Committing or allowing to be committed any sexual offence against a child or intentionally touching either directly or through clothing, the genitals, anus, or breasts of a child for other than hygiene or child-care purposes. Sexual abuse has some different characteristics of child abuse that warrant special attention. While physical abuse is often the result of immediate stress and not usually planned, sexual abuse requires planning with results that are more insidious. The planning, referred to as grooming, often results in victims accepting the blame, responsibility, guilt and shame for the sexual behaviour of the offender. Sexual abuse requires far more secrecy than other forms of child abuse, so is more difficult to report. Many victims, through the process of grooming, are taught that the sex is a form of love, so tend to love their offender and often present as happy and well-adjusted children with no negative symptoms because of their perception of being loved. It is crucial to be aware that a child often is not able to recognize the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

Possible indicators:

- Sexual knowledge, behaviour, clothing or use of language not appropriate to age level
- Unusual interpersonal relationship patterns
- Venereal disease in a child of any age
- Evidence of physical trauma or bleeding to the oral, genital, or anus areas
- Difficulty in walking or sitting
- Refusing to change into physical education (PE) clothes, fear of bathrooms
- Child running away from home and not giving any specific complaints
- Not wanting to be alone with an individual
- Pregnancy, especially at a young age
- Extremely protective parenting
- A person under the age of 18 creates and shares sexual imagery of themselves.

D. Emotional Abuse

Emotional abuse any type of abuse that involves the continual emotional mistreatment of a child. It is sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child.

Possible indicators:

Emotional abuse is often a part of other kinds of abuse, which means it can be difficult to spot the signs or tell the difference, though it can also happen on its own. There might not be any obvious physical signs of emotional abuse or neglect. And a child might not tell anyone what is happening until they reach a 'crisis point'. This is why it is important to look out for signs in how a child is acting.

- Seem unconfident or lack self-assurance
- Struggle to control their emotions
- Have difficulty making or maintaining relationships
- Act in a way that is inappropriate for their age.
- The signs of emotional abuse can also be different for children at different ages.

E. Peer on Peer Abuse:

Peer-on-peer abuse refers to any form of physical, sexual, emotional, or coercive abuse or harm that occurs between children or young people who are of a similar or the same age or developmental stage. This can happen online and in real life. This kind of abuse can happen in various settings such as schools, homes, or online platforms, and may include bullying, physical violence, sexual harassment or assault, coercive control, and exploitation. It can be a one-off incident or a sustained pattern of behaviour, and often involves an imbalance of power, even if the individuals appear to be of equal standing. At ESH we recognize that children are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up'.

Possible indicators:

- Unexplained injuries or frequent physical fights
- Avoidance of certain peers or refusal to attend school
- Sudden changes in behaviour, mood, or academic performance
- Withdrawn, anxious, or fearful behaviour around certain individuals
- Sexualised behaviour or language that is inappropriate for age
- Displaying bullying behaviour or becoming aggressive towards others
- Reluctance to use phones, social media, or going online
- Secretive behaviour, especially about friendships or activities
- Self-harm or signs of depression
- Reports from other students or adults about concerning interactions

4.3. Culturally and Linguistically Diverse Considerations

It is important to keep in mind cultural influences when assessing information or behaviour, and to avoid allowing personal beliefs or biases to influence decision-making. Culture shapes attitudes and ideas about acceptable student behaviour and discipline. For example, a family might have a different attitude toward nudity that is more relaxed than other families. The same can be said for family sleeping, which is common in some cultures. Some families consider spanking an acceptable disciplinary measure, while other families find it unacceptable under any circumstances. These values can vary widely, and cultural issues need to be understood. In order to work with people with various cultural identities in a way that promotes respect and dignity, it is important that you:

- ✓ Recognize any of your own pre-existing beliefs and biases and remain neutral
- ✓ Become educated about our culture(s) and understand information within the context
- ✓ Resist the temptation to classify or label people based on cultural preconceptions

While ESH strives to remain aware of and sensitive to cultural differences within its diverse community, it is ultimately obliged to follow Dutch safeguarding laws and regulations in all matters of protection and welfare.

4.4. Reporting Procedure for staff at ESH

Step 1: Record all concerns in EDUkey as soon as possible.

Step 2: The DSL will assess the situation and determine necessary actions.

Step 3: Mentor and Team leader will be informed unless otherwise determined by the DSL.

Step 4: Follow up instructions will be sent to involved parties, including members of staff, management, parents and external authorities if required.

4.5. Escalation

In cases of imminent danger or serious harm, staff must report directly to the appropriate Designated Safeguarding Lead (DSL) or external agency, such as Veilig Thuis (as per the *Meldcode*) or the police. The school's DSLs will coordinate the response while prioritizing confidentiality and the safety of the student. Contact the DSL without delay in cases of **self-harm, suicidal thoughts, or suspected abuse**. In this case the student should be supervised until DSLs are informed. The DSL will then create a follow up plan and inform the parents and involve external agencies where appropriate.

In of emergencies or safety-threatening situations, call 112 immediately.

5. Preventative Measures and Training

5.1. Staff Training

- All staff must complete the online AUGEO Child protection module annually.
- In-house training sessions will focus on the child protection, safeguarding, the Meldcode reporting steps and effective use of EDUkey.
- Additional training on specific safeguarding challenges, such as online safety and mental health concerns, will be provided.
- Training will align with both Dutch law and European Schools safeguarding policies.

5.2. Student Awareness

- Age-appropriate lessons on safety, boundaries, and reporting concerns will be integrated into the curriculum.
- Students are made aware of safeguarding procedures during the start of year assembly.
- Staff know how to direct students towards DSLs and the student support team.
- Peer-support initiatives will encourage students to look out for one another.

5.3. School Environment

- Regular risk assessments will ensure that the physical environment remains safe and secure.
- A designated confidentiality officer is available to handle sensitive information and concerns with discretion.
- The student support team is in place to provide emotional, academic, and social guidance to all students.
- Anti-bullying measures and positive behaviour reinforcement will be actively promoted.
- Students have designated safe spaces where they can seek guidance and support (Room 0.35).
- All adults on campus who work with or around students are required to obtain a Certificate of Good Conduct (Verklaring Omtrent Gedrag - VOG), along with police checks from previous countries of residence.
- Comprehensive reference checks are conducted for all staff prior to employment.

6. Monitoring and Evaluation

The Safeguarding Policy will be reviewed annually by the DSLs and school management to ensure ongoing compliance with legal requirements and best practices. The review will incorporate updates from both Dutch law and the European Schools' Pupils' Well-Being Policy Framework. Feedback from staff, students, and parents will inform updates and improvements.

Contact Information

For safeguarding concerns, please contact:

- **Designated Safeguarding Leads:**
 - Sec-safeguarding@eshthehague.nl
- **Team Leader and Policy owner:**
 - Michelle Sitskoorn - m.sitskoorn@eshthehague.nl
- **Date approved:**
- **Next review date: September 2026**

Appendix 1 – Safeguarding infographic for staff

SAFEGUARDING

Why?

Reporting safeguarding concerns is essential to ensure the safety and well-being of everyone in the school. It helps protect those at risk, prevents issues from escalating, and promotes accountability. Clear and timely reporting fosters a safe, supportive, and inclusive environment.

Who?

Any staff within the school can report safeguarding concerns, including teachers, administrators, and our volunteers.

Everyone has a shared responsibility to identify and report issues that could affect the safety or well-being of students.

How?

Follow the steps as mentioned in the Safeguarding flowchart. When in doubt, speak to a Safeguarding lead.

Safeguarding Leads

Elsa Clingman
Slobodanka Peshovska
Jerta van der Meer
Lizeth Kessels
Lidia Pardo Alba

Safeguarding Categories

- Abuse of power
- Bereavement
- Bullying
- Child sexual exploitation/trafficking
- Criminal activity
- Discrimination
- Domestic violence
- Drugs/Alcohol
- Emotional abuse
- Fabricated or induced illness
- Frequent absenteeism
- Gender-based violence
- Medical concerns
- Mental health concerns
- Neglect
- Parental issues
- Physical abuse
- Physical aggression
- Racism
- Radicalization/extremism
- Self-harm/suicidal tendencies
- Sexual abuse
- Sexual harassment
- Other

Important Tips

Act quickly – Submit your Safeguarding report as soon as possible after the incident.

Stick to the facts – Avoid assumptions, interpretations, or personal opinions.

Maintain confidentiality – Ensure that all details are logged in the report and shared only with the Safeguarding leads.

