

The Hague Child Protection Policy

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1. RATIONALE

The OSG EU Leadership Team sets policies and procedures aligned with the OneSchool Global Ethos, Values, and Vision. This Child Protection Policy sets out a clear approach to safeguarding and child protection, including responding appropriately to concerns arising both within school and through a student's wider life, in line with the school's legal and ethical responsibilities. OneSchool Global The Hague Campus complies with Dutch child protection legislation to ensure that all children learn in a socially, physically, and emotionally safe environment. This policy outlines our safeguarding responsibilities, both under OSG Global expectations and under Dutch statutory requirements.

2. PURPOSE

2.1 The Hague Campus as part of OSG EU is committed to fulfilling its duty of care to all students by:

- Complying with its obligations under child protection legislation, including the Mandatory Reporting Code ("Meldcode") and cooperation with Veilig Thuis Haaglanden as the statutory advice and reporting agency.
- Providing a learning environment that is safe, supportive, and caring.
- Recognizing promptly when any student is at risk of harm.
- Taking immediate and appropriate action to protect students when staff become aware of concerns that a student may be at risk of harm.
- Ensuring all staff act in accordance with the highest moral and professional standards.
- The school expects all staff, volunteers and visitors to uphold the commitments set out in this policy and to work collaboratively to maintain a safe learning environment.

2.2 Dutch safeguarding laws operate alongside OSG's 'reportable conduct' framework; If any disparity is found between OSGs safeguarding and child protection reporting procedures, Dutch law prevails.

3. SCOPE

3.1 This policy applies to all members of the school community, including staff, volunteers, contractors, students, parents, visitors and anyone involved with school activities in any way.

3.2 This policy applies to all interactions with children in person, online, or within family contexts related to school activities.

3.3 The policy forms part of staff onboarding and is shared with all trustees, volunteers, and individuals working with or around students.

3.4 The policy is publicly available on request and via the school website.

4. POLICY AND PROCEDURES STATEMENT

4.1 Safe Learning Environment

4.1.1 The school must create and maintain a safe learning environment, educating all members of the school community about safeguarding and child protection issues.

4.1.2 Staff must be familiar with child protection protocols and act promptly when concerns arise.

4.1.3 Reportable allegations and misconduct will always be taken seriously.

4.2 Professional Development

4.2.1 The CA and Campus Principal will ensure that:

- Staff will receive continuous professional development to support effective implementation of this policy.
- Safeguarding and Child Protection protocols are monitored and reviewed regularly to ensure effectiveness.

4.3 Awareness of Dutch Law

4.3.1 Staff must comply with Dutch law (<https://www.rijksoverheid.nl/onderwerpen/huiselijk-geweld/meldcode>), and follow the *Meldcode Huiselijk Geweld en Kindermishandeling*.

4.3.2 Staff are required to identify and respond to any signs or suspicions of child abuse or neglect, follow the steps of the reporting code, and consult with or report to *Veilig Thuis* where there are concerns about a child's safety or where adequate protection cannot be ensured.

4.3.3 Staff must take action whenever they:

- i. observe or suspect abuse, neglect, or domestic violence affecting a student; or
- ii. become aware of an allegation against a member of staff, regardless of when or where it occurred.

4.4 Failure to Act

4.4.1 Failure to follow the *Meldcode* or act on safeguarding concerns may result in disciplinary action and, where applicable, legal consequences.

5.EMPLOYMENT

5.1 The Hague Campus may not engage any person, in child-related work without disclosure of any prohibitions under Dutch law.

5.2 A valid VOG (Certificate of Conduct) must be presented before beginning their engagement with OSG. The VOG must be no older than six months and is checked and stored in accordance with national regulations.

5.3 OSG EU must carry out all relevant procedures of background checking of a preferred applicant before employing or entering an arrangement with that applicant in paid or unpaid work. This includes overseas Police Checks for anyone who has previously resided in another country.

5.4 The Hague Campus must not commence employment or enter an arrangement with, or continue to employ or engage, in child-related employment or activities a person (whether as an employee, volunteer, contractor, or otherwise) that the school knows is a prohibited person.

5.5 If any person engaged with The Hague Campus becomes a prohibited person their engagement will be terminated immediately. A member of staff who becomes a prohibited person must immediately inform the school.

6.SITE SECURITY

6.1 The Campus Security & Visitor Policy and procedures will be followed. Visitors to the Campus are asked to sign in and are given a lanyard, which confirms they have permission to be on site.

6.2 Red lanyards denote a lack of appropriate checks for the role they are performing at campus, and those individuals must be always accompanied i.e. contractors. The Campus Principal will ensure supervision is in place for any visitor that does not have the appropriate checks

6.3 Teal lanyards denote those who are security cleared such as staff.

6.4 OneSchool Global Head Office staff will wear identification badges in the same teal and red colours, which have the same meaning. The Campus Principal may contact the OSG EU Head office at any time to verify the credentials of a visitor from the Head Office.

6.5 All visitors are expected to observe the campus' safeguarding and health and safety requirements to ensure children in campus are kept safe.

7. ROLES & RESPONSIBILITIES

7.1 The Campus Principal is responsible and accountable for Safeguarding/Child Protection at the Campus, and is responsible for safeguarding duties outlines by OSG and Dutch Law (*Wet veiligheid op school*).

7.2 Safeguarding and Child Protection decisions are made by the CP (and Designated Safeguarding/Child Protection Lead (DSL), if the post exists in a Campus) in liaison with the Campus Child Protection Committee.

8. CHILD PROTECTION AND SAFEGUARDING PROCEDURES:

8.1 Any concern, suspicion, or allegation must be reported immediately to the Campus Principal/DSL and recorded on CPOMS (Child Protection Online Management System).

8.2 Staff must ensure that concerns are assessed in line with the *Meldcode Huiselijk Geweld en Kindermishandeling*. This includes consultation and, where appropriate, reporting to *Veilig Thuis*. If a staff member believes that appropriate action has not been taken and a child's safety cannot be ensured, they have a professional duty to seek advice from or report directly to *Veilig Thuis*.

8.3 Relevant authorities in the Netherlands:

- *Veilig Thuis Haaglanden* – Advice and Reporting Centre for Domestic Violence and Child Abuse (0800 2000 – 24/7)
- Police (112 in emergencies)
- *Leerplicht (Attendance) Authority* – where concerns relate to school absence and possible neglect
- Dutch Inspectorate of Education (*Vertrouwensinspecteur*) – mandatory reporting in cases of suspected sexual misconduct by staff

8.4 Allegations against the Campus Principal, CA, or senior leadership must be reported to the Regional Principal (RP) and Regional Director of Safeguarding (RDS), who will act in accordance with this policy and Dutch legal requirements.

8.5 Low-level concerns are not insignificant. While they may not meet the threshold for external reporting, they must always be recorded and monitored in CPOMS to identify patterns of behaviour.

8.6 The Campus Principal must ensure that all staff are aware of and comply with the *Meldcode* and internal OSG reporting procedures.

8.7 The Campus Principal and CA must ensure that any person reporting a concern is supported and not disadvantaged as a result of making a report.

9. ALLEGATIONS about Staff

9.1 OneSchool Global promotes an open and transparent culture in which all concerns about adults working in or on behalf of the school (including supply staff, volunteers, and contractors) are addressed promptly, consistently, and in accordance with Dutch safeguarding law.

10 ALLEGATIONS

10.1 An allegation is any information indicating that a member of staff, volunteer, contractor, or any person engaged in school activities (on or off campus) has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk to children's safety or wellbeing.
- Behaved in a way that indicates they may not be suitable to work with children, including behaviour outside the school context (*transferable risk*).
- A student may make an allegation against a staff member, or staff may have concerns about another staff member. Any such concern must be reported immediately to the Campus Principal/DSL.
- The Campus Principal will assess the concern in line with the *Meldcode Huiselijk Geweld en Kindermishandeling* and, where appropriate, seek advice from or report to *Veilig Thuis*.

10.2 Relevant Dutch authorities:

- *Veilig Thuis* – Advice and Reporting Centre for Domestic Violence and Child Abuse
- Phone: 0800 2000 (24/7)
- Website: <https://veiligthuis.nl>
- Police – 112 in emergencies
- Dutch Inspectorate of Education (*Vertrouwensinspecteur*) – mandatory reporting in cases of suspected sexual misconduct by a staff member
- Website: <https://www.onderwijsinspectie.nl/onderwerpen/vertrouwensinspecteurs>

10.3 If the allegation concerns the Campus Principal, the staff member must report this immediately to the Regional Principal (RP) and Regional Director of Safeguarding (RDS). They will assess the concern and consult with *Veilig Thuis* and/or other relevant authorities as required, without informing the Campus Principal in advance.

11. LOW-LEVEL CONCERNS

11.1.1 All low-level concerns must be reported to the Campus Principal/DSL and recorded, including actions taken.

11.1.2 These records are reviewed regularly by the Child Protection Committee to identify patterns of behaviour.

11.1.3 A low-level concern does not mean insignificant; it refers to behaviour that does not meet the threshold for an allegation but may still be inappropriate or concerning. This may include behaviour that:

- is inconsistent with the staff code of conduct, including outside of work;
- does not meet the threshold for referral to external authorities.

Examples may include (but are not limited to):

- being overly familiar with students;
- showing favouritism;
- taking photographs of students on a personal device.

12 CULTURE OF REPORTING

12.1 The school promotes a culture in which all staff are encouraged to report low-level concerns. These will be recorded and addressed appropriately.

12.2 Effective management of such concerns helps safeguard students and protects staff from misunderstandings or false allegations.

13 COMPLAINTS

13.1 Complaints from parents or students regarding the school's handling of safeguarding concerns will be managed in accordance with the school's Complaints Policy.

14. RISK MANAGEMENT

- 14.1.1 Pending completion of any investigation (whether by the school or an external authority / third party), the school may limit the contact the member of staff is to have with students or other staff, direct the member of staff to undertake duties other than normal duties or at different locations or suspend the member of staff (but on normal pay).
- 14.1.2 Before taking such action, the school must consider what risk, if any, the member of staff might pose to students. The school must consider all relevant circumstances, including (but not limited to):
- The nature of the allegation;
 - The vulnerability of the students (for example, because of their age, support needs);
 - The nature of the position occupied by the member of staff;
 - The extent to which the member of staff is supervised;
 - The disciplinary record of the member of staff;
 - The safety of the member of staff; and
 - The extent to which the investigation could be compromised by the member of staff continuing his or her normal duties.
- 14.1.3 Any action taken by the school under this section of the policy is not an indication that the school has made, or is likely to make, any particular findings in relation to the allegation against the member of staff. A fair and reasonable process will be followed to investigate the allegations.

15. INVESTIGATION

- 15.1 This section of the policy applies independent of any investigation that is being carried out by the Police, the *the Ministry of Education, Culture and Science (OCW)* or the *Dutch Inspectorate of Education* or another authority.
- 15.2 Investigations must be carried out in a way which affords procedural fairness to the member of staff involved. This means that, before completing an investigation of a reportable allegation, the member of staff should be informed of the substance of the allegation against them and provided them with a reasonable opportunity to put their case forward (if requested by the member of staff, with the assistance of a support person of the member of staff's choice).
- 15.3 Normally, the Regional Director of People and Culture and RDE decide the timing and the particular form this will take, ensuring the investigation is not compromised. It also means that the Regional Director of People and Culture and RDE must:
- Act fairly and without bias;
 - Conduct an investigation without undue delay
 - Ensure the case is not investigated or determined by someone with a conflict of interest
 - Ensure the outcome is supported by evidence
 - Take steps to maintain confidentiality for the sake of all parties involved in the investigation
 - At the conclusion of the investigation, the Regional Director of People and Culture and RDE will communicate the outcome
 - If it is found that the allegation against the member of staff is true, the school will follow its usual disciplinary process, and direct the member of staff to take the following actions

15.4 If the breach is minor, resulting from a misunderstanding of how certain words or behaviour were understood, the school may require that the member of staff undertake coaching, professional development, and/or a commitment not to repeat the offence;

15.5 In serious cases, the school may suspend or terminate the employment of the member of staff.

15.6 In most cases, the Regional Director of People and Culture should advise the victim and the member of staff in writing of the result of the investigation and the action taken. If the member of staff is unhappy with the conduct or result of investigation, they may take their complaint further to the OSG EU Board of Trustees and, if dissatisfied with the Board's response, *the Ministry of Education, Culture and Science (OCW) or the Dutch Inspectorate of Education*, the Police or any other relevant authority.

15.7 The Regional Director of People & Culture must, as soon as practicable, be satisfied that the investigation has been concluded:

- Save copies of any reports to and of all relevant statements taken in the course of the investigation and of all other documents on which the report is based.
- Where necessary provide the appropriate external agencies with such comments.
- Inform relevant parties that appropriate action has been taken.

16. Data Protection and Privacy (GDPR/AVG – Netherlands)

16.1 All safeguarding and student-related data at The Hague Campus is processed in accordance with the EU GDPR and Dutch AVG requirements. This includes:

- informing parents and students about how their data is used,
- minimising collected data to what is strictly necessary,
- maintaining a legally required processing register,
- storing records securely through CPOMS,
- ensuring access rights for parents and students,
- sharing information only when legally permitted, such as with Veilig Thuis or the Police.

17. PASTORAL CARE

17.1 Where a student is at risk of harm or is the person to whom the reportable conduct has allegedly been directed, the school must as soon as possible advise the student's parents or caregivers.

17.2 The school may choose not to inform the student's parent or caregiver if the school is satisfied that it will not be in breach of its duty of care to the student or to other students by not advising the student's parents or caregivers.

17.3 The school will endeavour to: Make available its support staff and external agencies (where appropriate) to provide counselling and other support as required to:

17.4 Any student who is at risk of harm or is the person to whom reportable conduct has allegedly been directed; and where relevant, their families.

17.5 Any member of staff against whom a reportable allegation has been made; may be directed to external agencies able to provide relevant care and support.

This policy fully incorporates The Netherlands legal obligations, including reporting duties, protection measures, and procedural guidance from Dutch law, and internal OneSchoolGlobal EU standards. If you notice any discrepancies, please contact the campus principal.