# CHILD PROTECTION AND SAFEGUARDING POLICY

**Reviewer (s):** Designated Safeguarding Lead
**Date:** September 15, 2026
**Date reviewed by School Leadership:** September 2026
**Date of next review:** June 2027

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## SCHOOL MISSION STATEMENT

The Dwight School Hanoi Mission states that: *Dwight School Hanoi is committed to finding and igniting the 'spark of genius' in every child. Kindling their interests, we develop inquisitive, informed, self-aware, and ethical citizens who will build a better world.*

## HIGH QUALITY LEARNING

Dwight School Hanoi defines High Quality Learning as *a continuous journey where empowered learners apply, transfer, and adapt knowledge and concepts to learning engagements that are designed to value diverse perspectives. Every learner is uniquely challenged to work towards targets in an environment that has been prepared to ignite critical thinking and make sense of the complexities of our world.*

Dwight School Hanoi believes that every learner has the right to develop themselves emotionally, intellectually, and physically. All children have equal rights to protection from any form of violence, abuse, or neglect. This right exists in the home, in their daily lives, while at school, and while engaged in any school-related activity. Child abuse and neglect are violations of a child's human rights and are obstacles to the child's education as well as to their physical, emotional, and spiritual development. All Dwight School Hanoi staff have a contractual obligation and duty to defend and uphold this right.

This Dwight School Hanoi Child Protection Policy is based on children's law no. 102/2016/QH13, international law, including the United Nations Convention on the Rights of the Child (1989), to which Vietnam is a signatory, which includes the following Articles of relevance:

- Article 3; which provides that the best interests of children must be the primary concern in decision making about them.
- Article 13; which provides that children have the right to get and share information as long as it is not damaging to them or another child.
- Article 14; which provides that children have the right to think and believe what they want and to practice their religion.
- Article 19; which provides children the right to be protected from hurt and mistreatment, physically and mentally.
- Article 34; which provides that Governments should protect children from sexual exploitation and abuse.
- Article 35; which provides that Governments should take all measures to ensure that children are not abducted, sold, or trafficked.
- Article 36; which provides that children should be protected from any activity that takes advantage of them or could harm their welfare and development.
- Article 37; which states that no one is allowed to punish children in a cruel or harmful way.

Dwight School Hanoi recognises that having this Child Protection Policy does not mean that any risk to our students is eliminated. It is our objective that this Child Protection Policy will empower the adults working in the School to recognise where a student is at risk of harm or is experiencing harm and to take steps to reduce further risk or further harm.

This policy serves to protect students from abuse or neglect and empowers faculty, staff, and other adult school personnel with a 'code of conduct' that will support them in maintaining healthy and positive developmental relationships with students.

**DWIGHT HANOI SAFEGUARDING TEAM 2026-27**

- Head of School: Jason Hayter
- Director of Divisions: Matt Buxton
- Whole School Social and Emotional Counselor: Thao Nguyen
- Whole School Social and Emotional Counselor: Emma-Lee Durrant
- Whole School Nurse: Huong Le
- Designated Safeguarding Lead and Child Protection Officer: Michael Calmer

**DEFINITIONS**

According to the the World Health Organization (WHO), child abuse includes "*all forms of physical and/or emotional ill-treatment, sexual abuse, neglect, negligence, and commercial or other exploitation, which results in actual or potential harm to the child's health, survival, development, or dignity in the context of a relationship of responsibility, trust, or power.*" Abuse is also defined as a stronger/more powerful individual engaging in a pattern of behavior in order to make personal gain at the expense of a weaker/less powerful person.

**Emotional Abuse** is any act by a person having the care of a child that results in the child suffering any kind of significant emotional deprivation or trauma. This may include routine inattention to a child's emotional needs, failure to provide psychological care, permitting the child to use alcohol or other drugs, verbal humiliation or harming a child's sense of self-worth and self esteem, refusing to acknowledge the presence of the child, invasion of privacy for no specific reason, and violent threats. Children affected by exposure to family violence are also included in this category.

Possible Indicators of Emotional Abuse:

- Exhibits low self-esteem
- Exhibits high levels of anxiety, fearful of doing something wrong
- Displays inappropriate emotional responses to painful situations
- Chronic running away
- Compulsive theft
- Obsessions or phobias
- Delayed speech or sudden development of a speech disorder
- Sudden and/or unexplained body ticks or movements
- Sudden under-achievement or lack of concentration
- Experiences difficulties with school attendance
- Difficulties in making friends
- Exhibits attention-seeking behavior
- Experiences incontinence and/or mysterious pains with no medical explanation
- Displays persistent tiredness
- Lying
- Delayed physical, mental, and/or emotional development

- Expresses inappropriate need for physical contact

**Physical Abuse** is inflicting or allowing to be inflicted physical harm or injury on a child by non-accidental means, causing skin bruising, burns, disfigurement, impairment of physical or emotional health, loss or impairment of any bodily function, or death.

Possible Indicators Of Physical Abuse:

- Bruises, burns, sprains, dislocations, bites, cuts, welts
- Improbable excuses given to explain injuries
- Injuries which have not received medical attention
- Injuries to the body in places that aren't normally exposed to falls, etc.
- Repeated urinary infections or unexplained stomach pains
- Refusal to discuss injuries
- Withdrawal from physical contact
- Fear of returning home or of parents being contacted
- Showing wariness or distrust of adults
- Is always watchful and "on alert", as if waiting for something bad to happen
- Shies away from touch, flinches at sudden movements, or seems afraid to go home
- Self-destructive tendencies
- Being aggressive towards others or being very passive and compliant
- Chronically running away
- Excessive need to use the toilet without medical reason
- Inappropriate clothing to cover up injuries
- Arms and legs kept covered in hot weather

**Sexual Abuse** is the exploitation of a student for sexual purposes. It may or may not involve physical contact and can include sexual imagery or language and the exposure of a student to any manner of sexual contexts. This includes any act by a person having the care of a child that exposes the child to, or involves the child in, sexual processes beyond his or her understanding or contrary to either the criminal code of the host country or school policy.

Possible Indicators Of Sexual Abuse:

- Being aggressive towards others
- Stomach pains or discomfort walking or sitting
- Being unusually quiet and withdrawn or unusually aggressive
- Suffering from physical ailments with no medical explanation
- Displays knowledge or interest in sexual acts inappropriate to his or her age, or even displaying seductive behaviour
- Showing fear or distrust of a particular individual
- Mentioning receiving special attention from an adult or a new "secret" friend who is an adult or older student
- Refusal to come to school or to continue with usual social activities
- Doesn't want to change clothes in front of others or participate in physical activities
- Regressive behaviors, bedwetting, or stranger anxiety
- Sexually provocative behavior
- Change in clothing style (extra baggy or very revealing)

**Neglect** is the persistent failure of a responsible adult to provide adequate care to a child, likely to result in the serious impairment of the child's health or development. Care can include food, clothing, shelter (including exclusion from the home), supervision, medical care/treatment, and emotional needs. This can

include any serious acts or omissions by a person having the care of a child that, within the bounds of cultural tradition, constitute a failure to provide conditions that are essential for the healthy physical and emotional development of a child. The parents of neglected children are not necessarily poor; they may equally be financially well-off.

Possible Indicators Of Neglect:

- Untreated illnesses and physical injuries
- Lack of dental care, glasses, immunizations, etc.
- Is frequently unsupervised or left alone or allowed to play in unsafe situations and environments
- Being hungry, or inappropriate/unhealthy food options
- Hygiene is consistently bad (unbathed, matted and unwashed hair, noticeable body odor)
- Clothes are ill-fitting, filthy, or inappropriate for the weather
- Not wanting to go home
- Is frequently late or absent from school
- Parents are uninterested in child's academic performance
- Parents do not respond to repeated communications from the school
- Parents cannot be reached in the case of emergency

When single parents, both parents, or legal guardians travel out of Vietnam while Dwight School Hanoi is in session, a temporary guardian must be appointed who will assume full responsibility, including medical responsibility, for the child for the duration of the absence, and a completed Temporary Guardianship Form must be submitted to the Division Office.

**Peer on Peer Abuse** is any form of physical, sexual, emotional, and financial abuse, or coercive control, exercised between children and within children's relationships. Peer on peer abuse can take various forms, including: bullying, prejudice-related bullying, cyberbullying, emotional/verbal abuse, relationship abuse, sexting, initiation/hazing, domestic violence, child sexual exploitation, physical violence, and harmful sexual behavior. These types of abuse rarely take place in isolation and often indicate wider safeguarding concerns. Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and in the spaces in which they spend their time. Read more about our Child on Child Abuse Policy here. Read more about our Online Safety Policy here.

## SCHOOL RESPONSIBILITIES

### Safer Recruitment

It is the School's responsibility to ensure that its employees and volunteers are screened to work with children, and the priority Dwight School Hanoi places on child protection will be made explicit throughout the advertising and interview process. Dwight School Hanoi is also committed to ensuring that all outside contracted workers have provided documentation of criminal background checks, completed successfully a valid safeguarding online course and screenings. Dwight School Hanoi has implemented a number of safeguarding policies and procedures for school recruitment with the aim of ensuring that:

- Candidates will be questioned on their understanding of safeguarding issues (role, boundary, power, accountability) in the interview process.
- Successful candidates fully understand their responsibilities towards Child Safeguarding while employed at the School.
- The School maintains appropriate record-keeping, should employee files or documents be required in a future investigation or inquiry.
- The School's partner recruitment agencies (eg. Search, Edvectus) require reference checks and background screening which supports Dwight School Hanoi's own recruitment protocols and meet the requirements of this Child Protection Policy.

- Background checks are required for all Dwight School Hanoi employees and external vendors.
- Telephone references will be made on all new hires and safeguarding questions will be asked explicitly.

The following records will be maintained by Dwight School Hanoi for every employee, either in hard copy or digital format:

- Full CV (including explanations for any gaps in employment)
- Written and documented verbal reference checks
- Non-criminal records, background checks, or police reports from all expatriate employees' home countries, as well as all previous countries of employment or residence
- Vietnamese non-criminal records, background checks, or police reports for all Vietnamese employees (as well as from any other countries of employment or residence)
- Valid teaching certifications, if applicable
- Notarized and authenticated copies of diplomas
- Signed Dwight School Hanoi Code of Conduct
- Work Permit/Visa application materials
- Documentation of Child Safeguarding Training

**Employee Training & Education**

Each year, all employees participate in Child Safeguarding Training to build or refresh awareness of student protection concerns, types of abuse and neglect, signs/symptoms, prevention, policies and laws, and internal and external reporting processes. The Safeguarding Team attends continuing education events that focus on child protection procedures and provide input for ongoing improvement to school policies on a regular basis. Best practices in safeguarding are shared across the global network of Dwight Schools. Training occurs annually and focuses on continued mindfulness regarding student protection agreements and employee protection guidelines.

## STAFF RESPONSIBILITIES

### Code of Conduct (Employees)

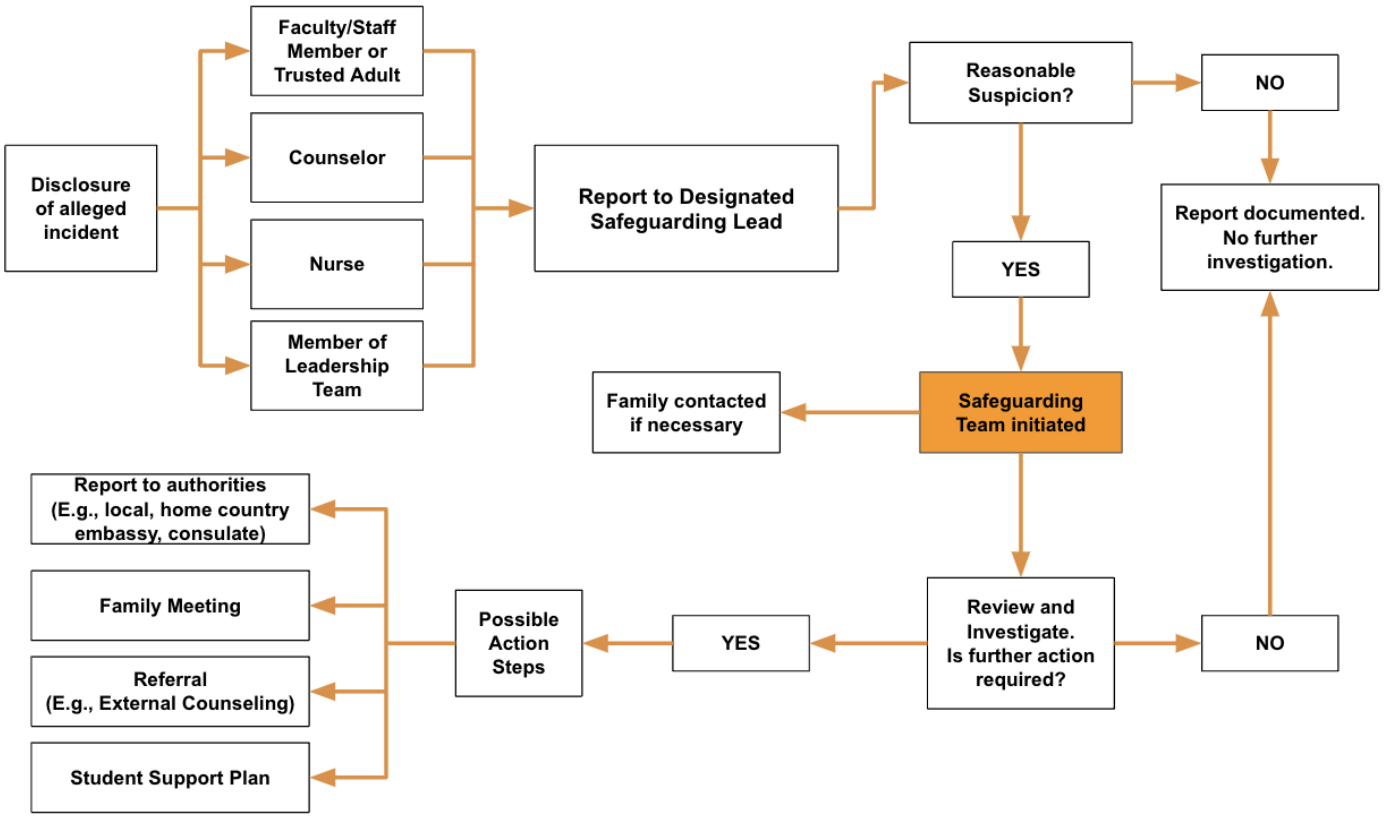
Dwight School Hanoi commits to providing for our community a safe, nurturing, and inspiring environment in which to learn and grow. In light of that profound responsibility, educators at Dwight School Hanoi are expected to display the highest standards of professionalism. The Code of Conduct lends substance to that responsibility.

**Responsibilities**

All Dwight School Hanoi staff (including partner organizations and contractors who have unsupervised contact with children) must:

- Be familiar with and follow this safeguarding policy and all other safeguarding-related policies, e.g. Codes of Conduct, guidance for safe working practice, etc.
- Be subject to safe recruitment processes and background checks prior to starting at the School.
- Be alert to signs and indicators of possible abuse and report these to the safeguarding lead and record this on CPOMS.
- Listen to and take seriously the views and concerns of children.
- Follow the procedures outlined in this document when/if concerned about any child.
- Act appropriately and effectively in instigating or co-operating with any process of investigation.
- Undertake appropriate training from time to time as required by Dwight School Hanoi.
- Understand the potentially serious disciplinary or even criminal consequences for failure to abide by the Code of Conduct or this Child Protection Policy, whether inside or outside the workplace.

## Steps Following Disclosure or Suspicion of Abuse or Neglect




### Disclosure or Suspicion

All employees have a moral duty and legal obligation to safeguard the welfare of our students and any child who participates or engages in our community. Employees are therefore required to report to the Designated Safeguarding Lead (DSL) in the case of reasonable grounds for concern that a student may be in danger from abuse from any adult including parents, guardians, carers, other staff, or community members. The report should be made to the DSL within 24 hours and contact with any and all persons involved should be left to the Safeguarding Team (listed above). In the case that the DSL cannot be contacted, a report can also be made to any member of the Child Safeguarding Team. Read here for more information about our Whistleblower Policy.

The DSL, in consultation with the Safeguarding Team, will make a determination whether there is reasonable cause to suspect neglect or abuse. The act of making a report does not assume 'guilt', rather the report should simply be made in good faith based upon a reasonable presumption that there is a situation that is worthy of investigation.

### Reasonable Cause

Reasonable cause to suspect abuse or neglect may be comprised of any or all of the following:

- Verbal accounts
- Physical evidence
- Implicit reference
- Presence of indicators of abuse, as outlined on previous pages
- Concerns or alerts may be as a result of:

- Observed student behavior (physical, emotional, change in behavior)
- Hearsay (third party disclosure)
- Disclosure (specific report made by a student directly or via a trusted adult)
- Observed adult behavior (breach of Code of Conduct)

If reasonable cause exists, a response team will be convened and the Head of School will be notified.

**Handling a Disclosure**

In most cases reports of concern will be based on observations, hearsay, or a "gut feeling". However, on occasion, a student may make a direct disclosure to a faculty or staff member on campus. It is best practice in these situations for the adult to articulate to the student that "This sounds like a safety concern. Let's go and speak with ..." If that is not possible, the following are some guidelines for adults in a disclosure situation:

- Believe the child.
- Listen carefully to what is said.
- Don't interrupt or prompt.
- Respond simply. Let the child tell the story in their own words.
- Don't interrogate or use leading questions (leading questions are those that prompt or encourage a specific answer. Some examples include "He hurt you, didn't he?" and "Your mommy told me you fell, is that true?").
- Use TED questions: TELL me what happened, EXPLAIN what happened, DESCRIBE what happened. Avoid asking "why" and "how" questions.
- Reassure the child that they are right to speak up.
- Do not criticize the alleged perpetrator as this may be someone whom the student has feelings for.
- Do not allow the student to feel "in trouble" or "at fault" for the abuse.
- Do not criticize or change the student's choice of words or language.
- Do not examine or search for physical evidence (only medical staff is allowed to examine a child in case of emergency).
- Be calm, attentive, and nonjudgmental.
- Do not display shock, anger, disgust, or disapproval of the parents, the student, or the situation. You may feel these things, but it is unlikely to be helpful to the student to share these feelings.
- Do not promise confidentiality; make it clear that this may not or cannot be kept a secret and that you may need to seek advice from someone who can provide more guidance..
- Write it down
    - using the child's words as far as possible (not your interpretation of what was said) as soon as possible (and within 24 hours at the latest) and record the date, time, location, and any other observations that concern you or that you think may be important.
    - If a student is nervous or shy to speak, ask them to write it down on a piece of paper. If they are only comfortable to write in their mother tongue, allow this (translation can be obtained)
- There is no expectation on the adult to investigate the case, but the adult should gather basic information about what may have taken place. A child abuse investigation can be highly specialist work and non-expert interference could obstruct a criminal investigation.

**Investigation**

If an investigation is required, information can be gathered from:

- School personnel who know the child's history at Dwight School Hanoi.
- School records.
- Witnesses, including but not limited to persons who were present at the time of the incident(s) and/or have knowledge of or observed indicators of abuse.

- The Child involved, through observations, play assessment, drawings, or interview.
- On the approval from the Head of School

The investigation will focus on gathering factual information and will be conducted in a way that assures respect and privacy for the child, their family, and others who may be involved. Based on the results of the investigation, the response team will develop an action plan, keeping the Head of School informed. At the discretion of the DSL and the response team, various other personnel may be requested to participate in the investigation.

The findings of the inquiry that will be taken into consideration could be:

1. The report is not substantiated.
2. The alleged abuse is unsubstantiated but there is reason to suspect it either occurred or could happen.
3. The report reveals probable cause.
4. The report is substantiated and there is real risk of the safety and possible further harm of the child.

**Intervention**

Based upon acquired information and findings of the inquiry, a protective plan and range of interventions will be developed by the DSL, counselor, and Head of School in collaboration with school personnel to assist the child and family. While not an exhaustive list, actions that may take place include:

- Documentation
- Emotional and professional support
- Monitoring and periodic review
- Interviews
- Parent meetings
- Observations
- Interim support and protection
- Contact local authorities
- Contact Embassy personnel
- Development of a Safety Plan
- Notification of police
- Notification of employer
- Termination

If the inquiry indicates that a third-party (i.e. a person outside the family) is a potential abuser, parents will be contacted immediately. If the suspected person is an employee of the school, Dwight School Hanoi policies governing professional conduct will be followed.

If parents or family members are involved in the abuse or neglect, the following may be options:

- Parent meeting to present the concerns
- Referral of the family to outside counseling

Special thanks to our sources:

- The resources shared through the Global Safeguarding Collaborative
- The work of International Task Force on Child Protection (ITFCP)
- International Centre for Missing & Exploited Children (ICMEC) education
- Central and Eastern European Schools Association (CEESA)
- Council of International Schools (CIS)
- East Asia Regional Council of Schools (EARCOS)
- Educational Collaborative for International Schools (ECIS)

- Department of Children - Ministry of Labor, War Invalids and Social Affairs - National Call Center for Child Protection 111