

Nursery Child Protection and Safeguarding Policy

Approved on: October 01, 2024

Approved by: Bertrand Ferret, Principal

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Purpose

This policy sets out the approach, philosophy, and procedures for protecting children from all kinds of maltreatment and harm while under the supervision of LFITM. It standardizes the responsibilities LFITM has in supporting and fostering children's feelings of security and confidence.

Policy Statement

LFITM develops and implements a Child Protection and Safeguarding Policy, which serves to identify and support children who are at risk of harm, as enforced by Federal Decree Law No. (3) of 2016 Concerning Child Rights (Wadeema), Federal Decree Law No. (31) of 2021 Promulgating the Crimes and Penalties Law and its amendments, Federal Decree Law No. (51) of 2022 Regulating Nurseries, Federal Decree Law No. (18) of 2020 on Private Education and its amendments, Executive Council Chairman Decision No. (26) of 2013 Regarding the Regulation of Private Schools in the Emirate of Abu Dhabi, and other relevant UAE laws.

LFITM complies with the provisions of this policy, and all related Dama Al Aman policies, handbooks, and guides. The policy shall address the following as a minimum:

1. The LFITM's Duty of Care, and Child Protection and Safeguarding Statement
2. Designated persons for child protection
3. Procedures for handling suspected incidents of maltreatment
4. Staff training and awareness
5. Disciplinary process
6. Management responsibilities
7. Visit rules
8. Confidentiality

1. Guiding Principles

1.1 Duty of Care

In line with Federal Decree Law No. (3) of 2016 Concerning Child Rights (Wadeema), which protects children's rights to learn and play in a safe and secure environment, LFITM has a legal duty of care to uphold and maintain the environment for the overall well-being of children in their care. See the ADEK Duty of Care Policy for further details on what the duty of care entails and its guiding principles.

1.2 Child Protection and Safeguarding Statement

The Child Protection and Safeguarding Policy begins with a Child Protection and Safeguarding Statement that serves to drive the requirements of the policy itself and enables the LFITM to organize its safeguarding processes accordingly. This statement is reviewed internally at least annually, unless an incident, new legislation, or guidance suggests the need for an interim review.

The Child Protection and Safeguarding Statement includes a commitment in line with the Dama Al Aman Handbook for Nurseries (DAA Child Protection Committee, 2024a).

2. Designated Persons

LFITM appoints a Child Protection Coordinator (CPC) and a Child Protection Team (CPT), and these appointments are reported to ADEK annually.

The CPC is responsible for case management within the LFITM. A delegate is nominated in case the CPC is unavailable/unable to perform their duties or is under suspicion of child maltreatment.

The Child Protection Team (CPT) is composed of the CPC and the deputy CPC and other members (maximum of 5). Members of the CPT shall undergo ADEK-mandated CPC training and should preferably be a senior member of staff or any other member of staff who has experience working with children at educational risk.

The CPC shall be the first point of contact when a case of maltreatment is identified. The CPC liaise with the ADEK Child Protection Specialist (CPS) to report the maltreatment concern case in addition to taking on all mandated responsibilities issued by the CPS/CPU.

The Child Protection Team constitutes of the following members:

Tina HO: Nursery Principal - Child Protection Coordinator

Ibtissem BENEBOUCHE: Delegate CPC

Wiam ABOUCHI: Social Worker

Laetitia URVOY: School Counselor

Hélène HADDAD: School Nurse

3. Procedures for Handling Suspected Incidents of Maltreatment

LFITM sets clear procedures for dealing with a suspected or confirmed incident of child maltreatment in line with Federal Decree Law No. (3) of 2016 Concerning Child Rights (Wadeema). The below measures are mandatory and in line with the guide on Handling Child Maltreatment Concerns within Nurseries (DAA Child Protection Committee, 2024b) provided that no other legal provisions in this regard are violated.

All staff – including any person who, in the performance of their duties, has regular or temporary contact with children and who provides services to children are mandated by Federal Law No. (3) of 2016 Concerning Child Rights (Wadeema) to report all cases of alleged and/or suspected maltreatment (conducted by any alleged/suspected perpetrator inside or outside of the LFITM) directly to the ADEK Child Protection Unit (CPU) within 24 hours upon suspicion.

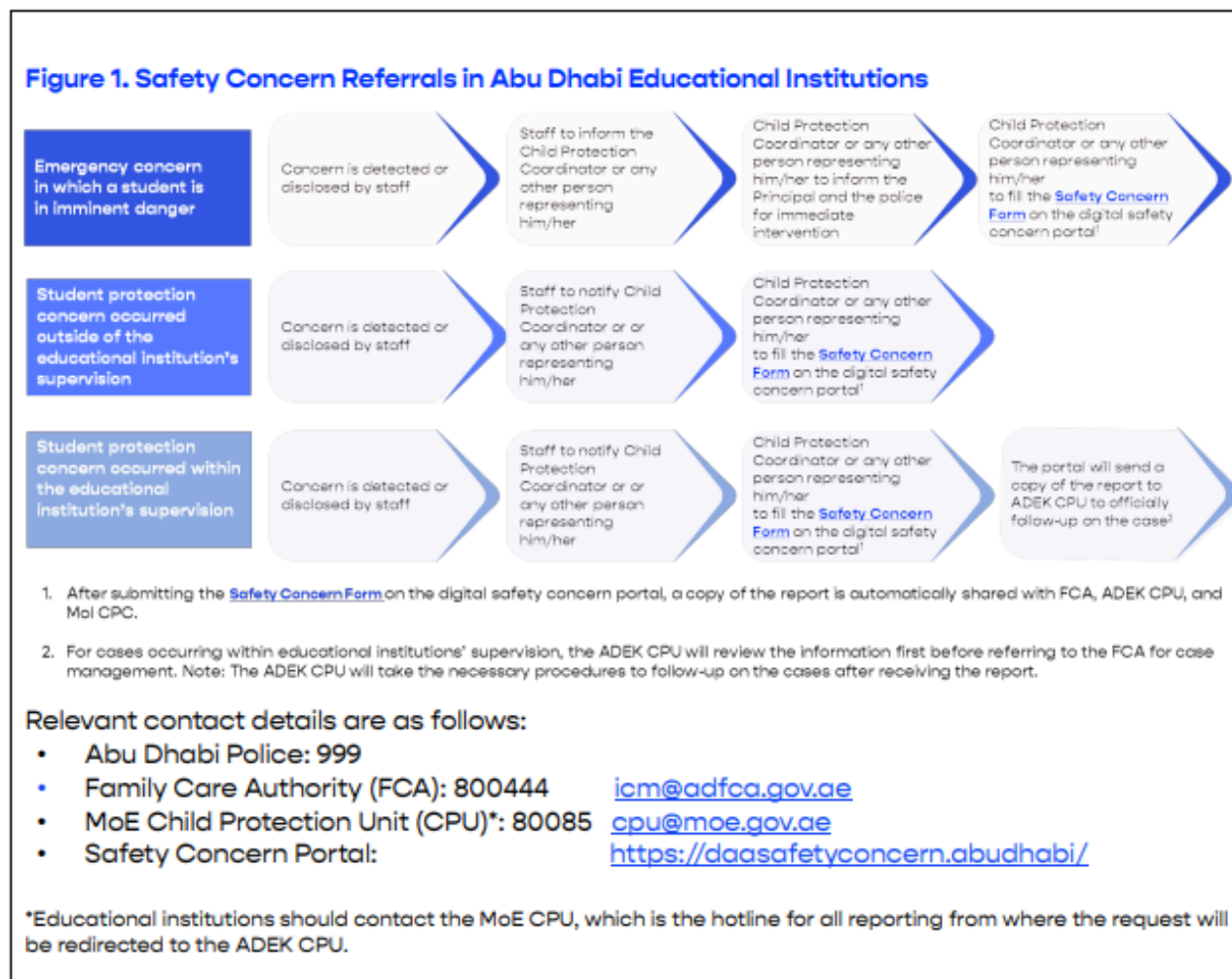
All concerns of maltreatment disclosed in the LFITM, whether the maltreatment took place inside or outside of the institution, should be notified to the CPC or any other person representing them. In case the reporter is unable to

reach the CPC, or any other person representing them, or other members of the CPT, or if it is not in the best interest of the child to inform the CPC or the team, then they should inform the CPU at ADEK and/or the FCA directly by filling out the Safety Concern Form online on the digital safety concern portal.

Emergency cases, where the child is in imminent danger, are reported without delay by the CPC to the Police (999) and the Director with a copy of the Safety Concern Form online on the digital safety concern portal. Emergency cases are detailed in the guide on Handling Child Maltreatment Concerns within Nurseries (DAA Child Protection Committee, 2024b).

All staff follow the procedures outlined in Figure 1. Safety Concern Referrals in Abu Dhabi Educational Institutions and the guide on Handling Child Maltreatment Concerns within Nurseries (DAA Child Protection Committee, 2024b).

Figure1. Figure 1. Safety Concern Referrals in Abu Dhabi EEIs



4. Staff Training and Awareness

LFITM trains all staff on the Child Protection and Safeguarding Policy as mandated by their CPU and ensures that staff are fully aware of and understand their responsibilities and obligations under this policy before their first day of work at the LFITM. Moreover, LFITM has in place an ongoing training mechanism to constantly keep staff updated on child protection and safeguarding procedures, including the following mandatory requirements:

- The CPC and deputy CPC complete all child protection policy and safeguarding training as mandated by ADEK, including an affidavit attesting to upholding the highest ethical standards and code of conduct in the management of child maltreatment cases.
- All LFITM staff complete any ADEK-mandated child protection policy and safeguarding training and sign off that they have received training and understand their responsibilities.

- LFITM ensures that all staff receive training on the awareness, understanding, and handling of all forms of maltreatment to help them identify signs of possible maltreatment that a child may have been subjected to by others.
- Volunteers receive adequate induction and training on the LFITM's child protection policy and safeguarding measures and sign off on having read the LFITM's Child Protection and Safeguarding Policy.
- All invited visitors are also required to attest to having read and understood the LFITM's Child Protection and Safeguarding Policy.
- Any staff providing counseling, support, advocacy, or being in close personal contact with children receive continuous training in child protection and safeguarding and be properly supervised by the Director.

5. Disciplinary Process

LFITM clearly outlines the disciplinary process taken in response to the maltreatment of children or breach of confidentiality caused by a member of staff. These measures shall be comprehensive, fair, and in line with the requirements laid out in the Handling Child Maltreatment Concerns within Nurseries (DAA Child Protection Committee, 2024b).

Staff who are suspected of an offense involving child maltreatment shall immediately be placed on temporary administrative leave until the suspicion is adjudicated.

The disciplinary process is communicated to all staff during staff induction and staff training, and included within the Staff Guidelines Handbook. LFITM collects signed affidavits from each staff member, attesting to having read and understood the Child Protection and Safeguarding Policy and disciplinary process.

6. Management Responsibilities

LFITM Management ensures that all staff are aware of and fully understand the child protection and safeguarding component within all of its policies and strive to implement the policies with determination, vigilance, and sensitivity. In particular, LFITM:

- Mandates that staff, volunteers, or invited visitors are vetted and receive the necessary clearances from the relevant local authorities before being allowed to interact within the LFITM environment.
- Develops and presents a set of guidelines (within a Staff Guidelines Handbook or as a separate guide), which summarizes and separates the child protection and safeguarding implications in each of the policies, for easy reference and understanding of all staff.
- Ensures that the following contact details are visibly displayed in the LFITM:

- Abu Dhabi Police: 999
- Family Care Authority (FCA): 800 444, icm@adfca.gov.ae
- MoE Child Protection Unit (CPU): 800 85, cpu@moe.gov.ae

7. Visit Rules

LFITM clearly states any rules for visits, including any responsibilities of the visitor and any member of staff liaising/coordinating the visit, and enables parents to access and review them on the LFITM's website.

LFITM ensures that rules for signing in any external, authorized vendors, visitors (prospective parents, authorized suppliers, etc.) are strictly followed by the reception staff, which includes asking the visitor to present a form of identification (Emirates ID or passport), which should be kept at the reception until the visitor exits the premises. The visitor shall be provided with a visitor's badge, to be worn at all times while in the LFITM.

LFITM displays the rules for visits at the reception so that they are visible to all visitors and shall include the following:

- Parents (both registered and prospective) that have children registered at the LFITM shall only visit outside of pick-up and drop-off hours when having a confirmed staff appointment.
- All suppliers, workers, or maintenance staff shall only be allowed to enter the LFITM after operating hours. In case of an emergency, they should have the consent of the LFITM's management before entering the LFITM and should always be accompanied by a staff member from the administration.

LFITM shall collect trade licenses and personnel IDs from all contracted contractors prior to being allowed to conduct any work on the premises.

At a minimum, the following types of visits shall be prohibited during operating hours:

- Visits by individuals or companies that disrupt children's learning or interrupt the regular flow of LFITM operations (e.g., maintenance works).
- Visits by individuals who are not the parents of children enrolled, or are not prospective parents (e.g., parents who wish to enroll their children in the LFITM).
- Visits by companies or vendors without prior scheduling or arrangement (e.g., salespersons), and/or arrangement with parents if their child is involved (e.g., in the case of birthday celebrations or special events).

8. Confidentiality

LFITM mandates all staff to abide by the requirements of Federal Decree Law No. (45) of 2021 Concerning the Protection of Personal Data to safeguard institutional data and develop confidentiality protocols for all staff to follow. The data (records, images, information, etc.) of all children shall be protected in line with the sections below:

8.1 Safeguarding Child Protection Data

- Maltreatment case reports and children's data shall be kept strictly confidential, including any footage from surveillance systems (see ADEK LFITM Surveillance Policy for guidance).
- The identities of the concerned child, the alleged/suspected perpetrator, and the person reporting the case shall be kept confidential by all parties involved.
- The data shall be shared only with authorized individuals from ADEK and the FCA, and within investigative teams and the Abu Dhabi Judicial Department.
- Authorized individuals shall be strictly prohibited from discussing active or closed cases with the media, any third parties or other staff, and/or unauthorized LFITM staff, except investigative and judicial authorities and within legal responsibilities.
- Written records of child protection concerns shall be kept securely and separated from the main set of children's files to be used to assess the likelihood of risk.
- Copies of child protection records and/or records of concern are transferred accordingly (separate from children's files) when a child leaves the LFITM.

8.2 Safeguarding Children's Personal Data

- Children's physical medical records and personal family details shall be filed separately and kept in a locked cabinet, with access given only to the concerned staff member, such as the nurse or management.
- Staff shall be instructed to only use the device(s) provided by the LFITM to take photographs of children, regardless of the purpose they are used for (e.g., learning journals, observations, the communication app, social media, etc.). If the staff member is using their own device, it shall only be with permission from the management and after signing a confidentiality agreement form.
- Children's pictures for marketing, social media, and website publications shall only be taken and used when parents have given their consent. The consent forms shall be signed by parents at the time of registration **and** the list of children who DO NOT have parent consent should be displayed in each key group to ensure that all staff are aware of the children who are not permitted to be on social media.
- Tablets/devices shall not be removed from the premises and always be stored safely (e.g., locked away on LFITM premises).
- The use of mobile phones shall be prohibited during the time staff are interacting with children.
- Any rules regarding the use of mobile phones shall be clearly communicated to all staff during induction, included in the Staff Guidelines and Handbook, and LFITM management should ensure that all staff, trainees, and volunteers are aware of and abide by the rules.

- CCTV coverage and functionality shall be checked regularly by management to ensure that it is working/recording sufficiently.

Any exceptions to the above points regarding children shall be based on the consent of the children's parents as well as the approval of the LFITM's management (see ADEK LFITM Surveillance Policy for further details on using and sharing personal data).

References

- DAA Child Protection Committee. (2024a). Dama Al Aman Handbook for Nurseries.
- DAA Child Protection Committee. (2024b). Handling Maltreatment Concerns within Nurseries.
- Executive Council Chairman Decision No. (26) of 2013 Regarding the Regulation of Private Schools in the Emirate of Abu Dhabi
- Federal Decree Law No. (3) of 2016 Concerning Child Rights (Wadeema)
- Federal Decree Law No. (18) of 2020 on Private Education and its amendments
- Federal Decree Law No. (31) of 2021 Promulgating the Crimes and Penalties and its amendments
- Federal Decree Law No. (45) of 2021 Concerning the Protection of Personal Data
- Federal Decree Law No. (51) of 2022 Regulating Nurseries
- Ministry of Education (MoE). (2020). Regulatory Compliance Manual for Early Childhood Institutions.