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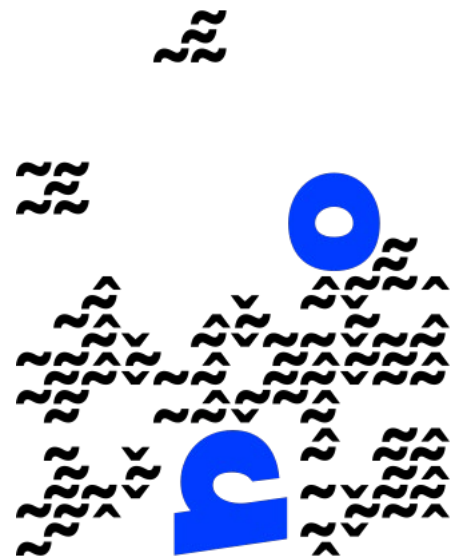
EARLY EDUCATION INSTITUTION **POLICY**

on

CHILD PROTECTION AND SAFEGUARDING

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 Early Education Institutions (EEl)s. It standardizes the responsibilities EEIs have in supporting and fostering children's feelings of security and confidence.



Definitions

Unless otherwise specified, the following definitions were adapted from the *Handling Child Maltreatment Concerns within Nurseries Guidelines* issued by the Abu Dhabi Early Childhood Authority of Abu Dhabi (DAA Child Protection Committee, 2024b).

Administration	The staff responsible for carrying out the administrative affairs of the EEI such as the accountant, receptionist, secretary, clerk, nurses, and others.
Child	A person under the age of 4 years, as per Federal Decree Law No.(51) of 2022 Regulating Nurseries.
Child Protection	All measures, steps, and actions taken to prevent, protect, and support children from risks of maltreatment while they are under the care of the EEI.
Child Protection Centre – Ministry of Interior (MOI-CPC)	An organizational unit housed at the Ministry of Interior that undertakes the role of developing and implementing initiatives and processes that aim to protect children living or visiting the UAE <i>(adapted from the Centre’s introductory webpage on moi-cpc.ae)</i> .
Child Protection Coordinator (CPC)	An appointed staff member at the EEI who is professionally trained and equipped with skills to act upon child protection concerns that arise within their EEI. The CPC is the key contact for staff and authorities where a concern is identified within the EEI. They should also be the point of contact for the EEI to respond to emergencies, report to the CPU and other authorities involved, liaise with parents, and provide ongoing support to the child.
Child Protection Specialist (CPS)	The ADEK-appointed person authorized and charged by the Abu Dhabi Judicial Department/Ministry of Community Development and ADEK to preserve the rights of the child and protect the child within the limits of the CPS’s powers, in accordance with Federal Decree Law No. (3) of 2016 Concerning Child Rights (Wadeema) and bylaws.
Child Protection Team (CPT)	Appointed members from within the EEI’s senior staff such as the CPC and Deputy CPC who are professionally trained and equipped with skills to act upon child protection concerns that arise within the EEI. They are the key contact for staff and authorities where a concern is identified within the EEI.
Child Protection Unit (CPU)	The organizational unit at ADEK aimed at developing and implementing child protection mechanisms and measures for educational institutions under its regulatory jurisdiction, in line with Federal Decree Law No. (3) of 2016 Concerning Child Rights (Wadeema) and bylaws. It is responsible for receiving and assessing

	child maltreatment concerns, in line with the procedures detailed in this document.
Deputy Child Protection Coordinator (Deputy CPC)	The member of staff responsible for undertaking the duties of the CPC in case the latter is unavailable.
Duty of Care	The legal obligation of the EEI and its staff to take reasonable steps to ensure the safety and wellbeing of the children in their care. This includes taking appropriate precautions to prevent accidents and injuries, ensuring that the environment is safe and suitable for children, and responding promptly to any incidents that occur. Duty of care at the EEI also includes providing appropriate supervision, support, and care for the children, and ensuring that the children's physical, emotional, and developmental needs are met.
Early Education Institutions (EEIs)	All ADEK-licensed institutions that offer early years' service (e.g., nurseries).
Emotional Abuse	<p>An act, whether consistent or inconsistent, used to make a child feel unloved, worthless, and of no value and integrity, interfering with the child's positive mental and emotional development.</p> <p>Emotional abuse may include denying children opportunities to express their views, deliberately silencing them, or mocking what they say or how they communicate. It may also involve seeing or hearing the maltreatment of another individual (child or person), as well as any form of bullying (see ADEK EEI Behavior Management Policy for the relevant definition), or deliberately intimidating or frightening children.</p>
Exploitation	Use of children in work or other activities for the benefit of others. This includes, but is not limited to, child labor and exploitation of children in prostitution or involvement of the child in gangs, militia, or military. These activities are to the detriment of the children's physical or mental health, education, moral, or social development.
Family Care Authority (FCA)	The FCA is an independent entity with full legal autonomy. It acts as the relevant authority and a single point of contact providing integrated services for all family-care beneficiaries in Abu Dhabi. It is an affiliate under the Department of Community Development (DCD) and is tasked with advancing the quality of life for families in Abu Dhabi.
Harm	The ill-treatment or the impairment of the health or development of the child. National Society for the Prevention of Cruelty to Children, (n.d.). <i>Child Protection Definitions</i> .
Invited Visitor	Any individual visiting the EEI on a temporary basis to interact with children (e.g., photographers, bookfair staff, entertainers, visiting sports instructors, extra-curricular activities service providers).

Key Group	Known as a “class” in more formal educational settings, comprises a group of children, an EE Educator, and any other members of the key team.
Key Person	A key staff member who is the primary contact for a key group of children and helps them feel safe and cared for.
Key Team	The team of staff in a child’s key group, whom they interact with daily and who take care of their physical, emotional, and educational needs, typically including the EE Educator, EE Educator, and EE Aide.
Maltreatment	Any act, or omission of act (e.g., negligence) that would cause harm to the child and prevent their upbringing and development in a sound, safe, and healthy manner. This includes abuse (physical, emotional, and sexual) neglect, and exploitation.
Management	The staff responsible for overseeing the EEI-based staff and daily operations, such as the EE Director, their deputy, as well as any other member of staff to whom they have delegated specific authorities.
Mandated Reporter	A person who is required by law (under Article 42 of Federal Decree Law No. (3) of 2016 Concerning Child Rights (Wadeema)) to report any child maltreatment concerns to the Child Protection Specialist. This includes the educators in educational institutions, or any adult on internal and external institution premises from which the child requests assistance in notifying the authorities (e.g., the Police, MOI-CPC, MoE, and ADEK) about his/her suffering or any other child’s suffering.
Neglect	Failure of a supervising parent or any adult to provide the basic needs and rights of a child towards their physical safety, development, and wellbeing, which may lead to a failure to thrive in the context of the resources reasonably available to the parent or staff member and causes, or has a high probability of causing, significant harm to the child’s health and/or physical, social, educational, mental, spiritual, or moral integrity.
Parent	The person legally liable for a child or entrusted with their care, defined as the custodian of the child as per Federal Decree Law No. (3) of 2016 Concerning Child Rights (Wadeema).
Perpetrator	A person who engages in maltreatment, or who has been determined to have caused or knowingly allowed the maltreatment of a child.
Physical Abuse	An intentional physical act which results in, has a high likelihood of resulting in, or poses a threat of resulting in immediate and/or long-term physical injury or harm to the child’s health, survival, and development.

Safeguarding	Protecting children from all kinds of risk of harm, including maltreatment and other types of risks that impact their overall health and development, wellbeing, and safety.
Safety Concern Form	A form used to document the details of a case or a suspected case of child abuse or neglect.
Sexual Abuse	<p>Involvement of a child in sexual activity that they may or may not fully comprehend, or that violates the laws or social taboos of society. Child sexual abuse is evidenced by the activity between an adult and a child, or between a child and another child, who by age or development, is in a relationship of responsibility, trust, or power. The intent of the activity is to gratify or satisfy the needs of the other person.</p> <p>Activities could also include practices that do not involve any physical contact, such as involving children in watching or producing pornographic material, watching sexual practices, or encouraging children to behave in inappropriate sexual ways.</p>
Staff	People employed by an EEI on a remunerated contractual basis regardless of employment mode (internal, external/third-party, etc.).
Volunteer	An individual engaged by the EEI on a non-remunerated basis to interact with children (e.g., parents, chaperones, etc.).



Policy Statement

EEIs shall develop and implement 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.

All EEIs shall comply 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 EEI'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, EEIs have a legal duty of care to uphold and maintain the environment for the overall wellbeing of children in their care. Please see the [ADEK EEI 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 EEI Child Protection and Safeguarding Policy shall begin with a Child Protection and Safeguarding Statement that serves to drive the requirements of the policy itself and enables the EEI to organize its safeguarding processes accordingly. This statement shall be 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 shall include a commitment in line with the *Dama Al Aman Handbook for Nurseries* (DAA Child Protection Committee, 2024a).

2. Designated Persons

- a) EEIs shall appoint a Child Protection Coordinator (CPC) and a Child Protection Team (CPT), and these appointments shall be reported to ADEK annually.
- b) The CPC is responsible for case management within the EEI. A delegate shall be nominated in case the CPC is unavailable/unable to perform their duties or is under suspicion of child maltreatment.
- c) The Child Protection Team (CPT) is comprised of the CPC and the deputy CPC and can be composed of other members (maximum of 5).
- d) 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.
- e) The CPC shall be the first point of contact when a case of maltreatment is identified. The CPC shall also 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.

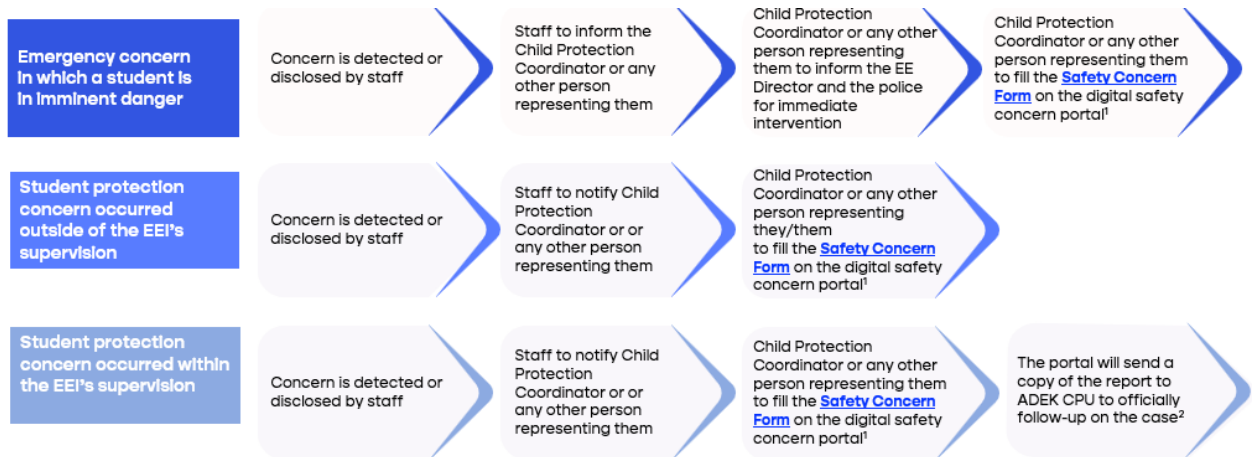
3. Procedures for Handling Suspected Incidents of Maltreatment

EEIs shall set 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.

- a) 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 or to the EEI – 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 EEI) directly to the ADEK Child Protection Unit (CPU) within 24 hours upon suspicion.
- b) All concerns of maltreatment disclosed in the EEI, 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 that 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.
- c) Emergency cases, where the child is in imminent danger, shall be reported without delay by the CPC to the Police (999) and the EE 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).

- d) All staff shall 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).

Figure 1. Safety Concern Referrals in Abu Dhabi EEIs



1. After submitting the [Safety Concern Form](#) on the digital safety concern portal, a copy of the report is automatically shared with FCA, ADEK CPU, and MoI CPC.
2. For cases occurring within EEIs' supervision, the ADEK CPU will review the information first before referring to the FCA for case management. Note: The ADEK CPU will take the necessary procedures to follow-up on the cases after receiving the report.

Relevant contact details are as follows:

- Abu Dhabi Police: 999
- Family Care Authority (FCA): 800444 icm@adfca.gov.ae
- MoE Child Protection Unit (CPU)*: 80085 cpu@moe.gov.ae
- Safety Concern Portal: <https://daasafetyconcern.abudhabi/>

Please refer to the [ADEK EEI Child Protection and Safeguarding Policy Guide](#) for more information about recommended procedures.

4. Staff Training and Awareness

EEIs shall train all staff on the EEI's Child Protection and Safeguarding Policy as mandated by their CPU and ensure that staff are fully aware of and understand their responsibilities and obligations under this policy before their first day of work at the EEI. Moreover, EEIs shall have in place an ongoing training mechanism to constantly keep staff updated on child protection and safeguarding procedures, including the below mandatory requirements:

- a) The CPC and deputy CPC shall 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.
- b) All EEI staff shall complete any ADEK-mandated child protection policy and safeguarding training and sign off that they have received training and understand their responsibilities.
- c) EEIs shall ensure 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.

- d) Volunteers shall receive adequate induction and training on the EEI's child protection policy and safeguarding measures and sign off on having read the EEI's Child Protection and Safeguarding Policy.
- e) All invited visitors shall also be required to attest to having read and understood the EEI's Child Protection and Safeguarding Policy.
- f) Any staff providing counseling, support, advocacy, or being in close personal contact with children shall receive continuous training in child protection and safeguarding and be properly supervised by the EEI Director.

5. Disciplinary Process

EEIs shall clearly outline 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 shall be communicated to all staff during staff induction and staff training, and included within the Staff Guidelines Handbook. EEIs shall also collect signed affidavits from each staff member, attesting to having read and understood the Child Protection and Safeguarding Policy and disciplinary process.

6. Management Responsibilities

EEI Management shall ensure 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, EEIs shall:

- a) Mandate 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 EEI environment.
- b) Develop and present 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.
- c) Ensure that the following contact details are visibly displayed in the EEI:
 - 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

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

EEl's shall ensure 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 EEl.

EEl's shall display 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 EEl 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 EEl after operating hours. In case of an emergency, they should have the consent of the EEl's management before entering the EEl and should always be accompanied by a staff member from the administration.

EEl's 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 EEl 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 EEl).
- 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

EEl's shall mandate 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

- a) Maltreatment case reports and children’s data shall be kept strictly confidential, including any footage from surveillance systems (see [ADEK EEI Surveillance Policy](#) for guidance).
- b) The identities of the concerned child, the alleged/suspected perpetrator, and the person reporting the case shall be kept confidential by all parties involved.
- c) The data shall be shared only with authorized individuals from ADEK and the FCA, and within investigative teams and the Abu Dhabi Judicial Department.
- d) Authorized individuals shall be strictly prohibited from discussing active or closed cases with the media, any third parties or other staff, and/or unauthorized EEI staff, except investigative and judicial authorities and within legal responsibilities.
- e) 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.
- f) Copies of child protection records and/or records of concern are transferred accordingly (separate from children’s files) when a child leaves the EEI.

8.2 Safeguarding Children’s Personal Data

- a) 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.
- b) Staff shall be instructed to only use the device(s) provided by the EEI 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.
- c) 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.
- d) Tablets/devices shall not be removed from the premises and always be stored safely (e.g., locked away on EEI premises).
- e) The use of mobile phones shall be prohibited during the time staff are interacting with children.
- f) 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 EEI management should ensure that all staff, trainees, and volunteers are aware of and abide by the rules.

- g) 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 EEI's management (see [ADEK EEI Surveillance Policy](#) for further details on using and sharing personal data).

9. Compliance

9.1 This policy shall be effective as of the start of the Academic Year 2024/25 (Fall term). EEIs are expected to be fully compliant with this policy by the start of the Academic Year 2025/26 (Fall term).

9.2 Failure to comply with this policy shall be subject to legal accountability and the penalties stipulated in accordance with the ADEK's regulations, policies, and requirements, notwithstanding any other penalties imposed by Federal Decree Law No. (31) of 2021 Promulgating the Crimes and Penalties and its amendments or any other relevant law. ADEK reserves the right to intervene if the school is found to be in violation of its obligations.

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*.

Publication

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Department of Education and Knowledge, Abu Dhabi (ADEK)

This policy applies to Early Educational Institutions (EEI) in Abu Dhabi.