



St. Paul's Childcare and Pre-Learning Centre

Policies and Procedures Manual

Version control

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1. Our Mission Statement

We create play-based learning environments that allow children to learn through discovery and experimentation. Our highly trained staff oversee children's play to always encourage enquiry and secure children's safety. We care for children in an environment where learning is fun so that love of learning is the foundation for a child's life. Involving sensory, gross motor and fine motor activities, understanding the world around us and making arts and crafts to facilitate and develop all the necessary skills that children acquire to reveal their full potential related to that early foundation stage.

That stage is very important because all children develop in different ways and development is not a linear or automatic process. It depends on each unique child having opportunities to interact in positive relationships and enabling environments that encourage their engagement and recognise their strengths. All children have agency and curiosity to learn and will interact with other people and the world around them in different ways. Understanding these different ways of knowing about the world is central to understanding who children are and how best to support their development.

2. Our Programme

2.1. Who we are

St. Paul's Childcare and Pre-Learning Centre was founded in 2021 by Mrs Donha Muscat, who is the Legally Responsible Person and owner of the childcare centre. St. Paul's Childcare and Pre-Learning Centre is a new Childcare setting that provides various development opportunities for the children to discover a better world for themselves and others. We are well organized professionals that always will be there for the children nurturing to a high level of grown-up individuals. Nevertheless, the prepared Childcare environment according to the Early Years Foundation Stage principles is playing a vital role in the process of learning, creating and designing our children's future.

Mrs Donha Muscat has first-hand experience in what it takes to balance raising young children and working towards creating a fruitful career. At St. Paul's Childcare and Pre-Learning Centre, we provide the solution to obtaining a work-life balance through flexible childcare. Our Childcare Centre is centred around providing solutions to the obstacles working parents or guardians face. Our drive, enthusiasm and child-centric programme make St. Paul's Childcare and Pre-Learning Centre the ideal place for your child's early years.

The childcare centre is a brand-new nursery located in Pieta. We offer excellent and flexible opening hours. The centre caters for kids all under the professional care of certified carers and offers a balance of education, play, physical activities as well as social development.

2.2. Infant and Baby Care Programme – new borns to 1 year olds

Our programme provides a nurturing and welcoming environment. Your baby's caregiver is a qualified and nurturing child development professional who is focused on creating experiences and opportunities that enhance the child's exploration phase and also encourages the important development that is occurring during the child's first year. More than just a day care, at St. Paul's Childcare and Pre-Learning Centre we are thoroughly focused on keeping your baby content and protected. We offer personalised care for each infant based on his or her specific schedule, nutrition, and any other special attention he or she may require.

Our brightly coloured baby section is catered for your little ones. Babies have their daily routine which is well planned with the carer and parents of the child. Babies attending St. Paul's Childcare and Pre-Learning Centre will be provided with a daily report covering what the child did that day, hours of sleep, nutritional information, nappy changing and other reflections on the child's day at St. Paul's.

2.3. Toddler's Programme

Children learn best through play. At St. Paul's Childcare and Pre-Learning Centre children develop their learning through play and our interactive and creative play programs. We have a wide range of age-appropriate toys and equipment (which are both certified), so that children's individual needs are met daily.

Anything broken by the children within the childcare centre must be paid in full.

Curriculum guidance for the foundation stage sets out five areas of learning:

- Personal, social and emotional development;
- Communication, language and literacy;
- Knowledge & understanding of the world;

- Physical development;
- Creative development.

2.4. Equal Opportunities

Recruitment and employment of staff will comply with all relevant equality legislation – see recruitment guidelines on page 27.

St. Paul's Childcare and Pre-Learning Centre is open to all families in the community.

We truly believe in providing learning opportunities for children to explore their own identity and build his/her self-esteem free from attitudes which would limit their development.

A range of activities is chosen to reflect various differences in cultures, gender and ability.

We check our materials to ensure that they challenge stereotyping and positively and accurately reflect cultural and racial diversity.

Special dietary needs of children and adults are catered for carefully and attentively.

We will challenge any statements or behaviour by anyone in the service which are racist or sexist or which reinforce stereotypes, or which are in any other way derogatory to an individual or group.

We ensure equal access for children with any special needs, equal access to sporting, play, recreational and leisure activities.

Children at St. Paul's Childcare and Pre-Learning Centre have the same access to facilities, services and opportunities and they are not disadvantaged by age, disability or by culture.

At St. Paul's Childcare and Pre-Learning Centre, children with special needs, including but not limited to diabetes, will be given extra assistance in areas of their development such as communication, physical skills, learning or behaviour. Early identification is essential in order to support children with special needs. In effect, we aim to adapt our routine, activities and environment to allow all children to participate and reach their full potential. Through our detailed curriculum, we aim to make all activities available to all children throughout the childcare centre at a level appropriate to their developmental needs. Furthermore, the centre is well designed to cater for persons with physical disabilities and also wheelchair users.

3. Admission to our Childcare Centre policy

3.1. Enrolment

Prior to a child's enrolment and attendance at St. Paul's Childcare and Pre-Learning Centre, the parents or guardians must complete and sign:

- The registration form;
- The government form;
- Complete the child's background information sheet.

All information will be kept securely pursuant to our obligations under the Data Protection Act, Chapter 586 of the Laws of Malta, as further detailed in these policies and procedures.

This will provide the centre with the following vital information:

- Name, home address and date of birth of each child;
- Starting date and number of sessions per week required;
- Arrangements for payment of fees and a non-refundable registration fee;

- Name, address and telephone numbers of parents or guardians;
- Emergency telephone numbers;
- Pick up authorisations;
- Dietary requirements;
- Health history;
- Details of any allergies;
- Parental consents on emergency procedures.

3.2. Settling in process

We aim to ensure your child's induction to our childcare facility is as pleasant and stress free as possible.

During the settling in session prior to the child's first day, a parent will also be asked to complete the Background Information Sheet which provides the preschool with further information. This includes details of who will be collecting the child and the child's likes and dislikes. This extra information enables us to get to know the child better and helps with the settling in process.

Prior to the child's first day, a preliminary session is held with the child and his or her carer with the presence of a parent to discuss child's behaviour and milestones. This is subject to COVID-19 measures and regulations in place at the time. This gives the opportunity for the mother to get to know the carer of the child and the child to observe also the carer on a one-to-one basis. This may reduce any separation anxieties both for the parent and the child. Parents are obliged to attend the induction meeting with the centre's Childcare Manager.

4. Government Scheme Users Terms and Conditions

Kindly note:

- Children whose parents or guardians are in work or in education can benefit from the free childcare scheme.
- Parents in work is defined as both parents/guardians who are in work, or single mother/father/guardian who are in work and paying social security contributions. Parents in education is defined as both parents/guardians who are in education leading to a recognised diploma or degree or single mother/father/guardian who are in education. Parent/s is/are entitled to free childcare for all children of child care-age, at a rate which is pro-rata to the mother's (or single father) employment hours.
- Parent/s or guardian/s is/are to inform the provider of any changes in the number of hours and days of service one month in advance according to the Government deadline.
- Parent/s or guardian/s is/are urged not to over-book more hours of childcare than what is necessary. In case of overtime or unforeseen circumstances, an additional allowance of 10% over the booked hours will be paid by the government if utilised.
- Parent/s can consume more hours than they are entitled to with the free childcare scheme. These hours will be recorded as extra hours and parent/s must pay at St. Paul's Childcare and Pre-Learning Centre's rates directly, as found on page 36. St. Paul's Childcare and Pre-Learning Centre informs parents and guardians of the chargeable rate prior to registration.
- Parent/s has/have to present a medical certificate when a child is sick for more than 1 day, in order to be allowed to re-attend child care.

- Parent/s or guardian/s are entitled to a monthly absence allowance of 10% under the booked hours. For example, for a 100-hour monthly pack, a child can attend a minimum of 90 hours. Thus, if attendance is less than 90 hours, the remaining balance will be deducted from the absence entitlement. These absence days will apply pro-rata on a calendar basis and will be equivalent to 15% of the booked hours. This provision includes the allowance for absence for medical reasons. Parents are to pay for absence days in excess of the above.
- The uniform rate being paid covers staff costs and consumables including stationary. It will not cover costs that relate to individual child needs, such as food, diapers and wipes. Cost of outings is not included.
- Free Childcare is terminated once the child is eligible to enrol into Kindergarten 1.
- The Government will continue to pay for free Childcare while the mother is availing herself of maternity leave. Free Childcare is not extended to parental leave.
- Parent/s will be able to opt either for free Childcare or the tax rebate scheme.

5. Working in partnership with parents

Good parenting and high-quality early learning provide the foundation children need in order to flourish and develop most of their abilities as they grow up. At St. Paul's Childcare and Pre-Learning Centre we recognise that working together in partnership with parents can have long-lasting and beneficial effects on children's learning and well-being. To this end, we aim to form good relationships with parents so that information regarding their children can be easily exchanged by both staff and parents

At St. Paul's we welcome the presence and involvement of the parents, especially during the first few days when the child is attending our childcare centre. The centre recognises that working in tandem with parents is imperative and of great importance to our early learning centre in enabling it to provide a happy, caring and stable environment for children and their parents. We strive to form a good relationship with parents so that information regarding their children can be easily and efficiently exchanged between our carers and the children's guardians. We try to help parents and guardians adjust to different situations.

5.1. Achieving a strong working partnership with parents

Hereunder is a list of ways in which here at St. Paul's, we will try to achieve a strong working partnership with parents and guardians:

- Parents are invited to an introductory meeting.
- The Childcare Manager in charge is always available for discussion with parents, be it a phone call or email away.
- Parental meetings are held on a regular basis on appointment. Since parents are very busy, arrangements can be made for more private discussions at agreed times.
- Information provided by parents about their children will be kept confidential and treated on a strict need to know basis and in compliance with our privacy notice.
- Information regarding the children's activities throughout the day is always available to parents on a daily basis through reports.
- Parents and guardians are invited to Open Days twice a year, subject to COVID-19 Regulations in place at the time, the children are encouraged to show their crafts and activities to their parents.
- An evaluation / feedback sheet is given to parents every parental meeting and can be filled anonymously from our website.

- If we have any concerns about a child's well-being during the day every effort will be made to contact the parents, guardians, or their emergency contact.
- Parents are requested to keep us informed of any changes to personal circumstances which may have an effect upon a child, e.g., change of address, telephone number, doctor, emergency contact.
- The carers at St. Paul's Childcare and Pre-Learning Centre consult with parents and guardians on the progress and development of the children daily and maintain a good and friendly relationship with them.
- The staff ensures that all the children feel included, secure and valued. They build positive relationships with their parents on order to work effectively with them and their children.
- Each of our carers fills in a daily report for children in his or her group provided by the centre which indicates the child routine at the centre including food intake, nappy change/potty training, activities and any other information that the parent needs to know.
- Parents are also requested to keep us informed of any circumstances which could have an effect on a child's emotional well-being, e.g., bereavement, separation or illness in the family.

5.2. General Consent for outings

Permission to take children off the premises

As part of early learning planning, the nursery will arrange local visits and walks in the neighbourhood to support children's knowledge, understanding and experiences. For example, they could learn about different kinds of food and cooking ingredients during a trip to a supermarket, or collect objects of interest for a collage or table display during a walk in the park.

For your child to take part in such activities we require written permission from their parent(s).

All outings away from the St.Paul's Centre will be assessed to identify risks and measures will be put in place to ensure children, staff and assistants are safe during their time away from our Childcare Centre (please refer to our Visits and Outings policy).

Adult to child ratios will be higher than normal on these occasions and we would welcome and appreciate any parents who would feel able to accompany us on short walks and trips.

Separate letters and general consent forms will be sent out for visits and trips further afield.

5.3. Trips and Outings Policy and Procedure

At St.Paul's Childcare Centre we recognize the importance of trips and outings and encourage children to participate in planned or spontaneous trips and outings in order to enhance the opportunities provided. All policies and procedures that are implemented throughout our Childcare Centre must continue to be implemented

whilst on the trip/outing in addition to the procedure set out below.

Procedure:

- The nursery Manager and the Deputy must be informed and oversee the organization of any trip/outing
- All parents should be well informed of the trip/outing and be provide with plenty of notice and detail if a big trip is planned, however if a spontaneous trip is planned staff will revert to registration forms for consent from parents.
- Written consent from the parents must be obtained for every child prior to them attending and trip/outing, this can be found on the registration form prior to joining the nursery.
A minimum of two emergency contacts must be provided by the parent on the consent form.
- Parents should be encouraged to participate in our trips/outings. However, they must only take charge of their own child/ren and must never be left unsupervised with any other children.
- The room leader/deputy or a member of the nursery management team must attend the trip/outing, and be present during the whole outing.
- At least one qualified first aider (this is dependent on the size of the group) must be present at all times.
- A first aid kit must be taken on the trip.
- Staff and children's medication must be taken on the trip/outing (where necessary) the staff complete the outing form which states medication to take on the outing.

Please note that this policy discourages the splitting of the whole group, therefore if this occurs it should be treated as two trips.

There are no set ratios stated in the statutory welfare requirements during outings: however, the following must be adhered to (at the very minimum):

- 0-3 years: one adult – two children
- 3-5 years one adult – four children

Please note the above ratios may need to be reduced depending on where the children are visiting and the route that they are taking. A risk assessment will determine this and this is completed before the trip/outing commences.

- All dietary requirements must be adhered to and a full list of these requirements must be taken on the trip/outing
- Food and drink must be provided at similar times to those at our Childcare Centre and drinks should be offered throughout the day. Staff must also be provided with food and drink
- All medical needs must be adhered to during the trip/outing and all medication must

be taken and managed by the person in charge of the children with any medical condition. Please remember to ensure that this is out of reach to all children.

- Nappies, wipes, spare clothes etc. must be taken for those children who need them and the nursery nappy changing and intimate care procedures must be followed at all times.
- The person in charge on the outing must take the nursery mobile and ensure it is fully charged and has sufficient credit, with telephone numbers of the nursery as well as the mobile numbers of the owners.
- The nursery camera must stay with the person in charge of the trip/outing. In the event that the camera is lost, this must be reported immediately, and the parents will be informed when they collect their child.
- All children must be provided with adequate clothing, and wear a high-visibility jacket
- All adults must be provided with a list of children attending the trip and the specific group that they are in charge of. The list must also contain any specific details relating to those children (medical/diet etc)
- A regular head count should be conducted and recorded throughout the trip/outing.
- A central meeting point must be arranged if the group needs to be split at any point.
- All policies and procedures should be adhered to whilst on the trip/outing.
- A thorough trips and outings Risk Assessment must be completed by the person organizing the trip and checked by the Nursery Manager or Deputy Manager

Checklist for visit/outings

- Consent forms for all children (which include at least two emergency numbers)
- A thorough trips and outings risk assessment has been completed
- List of children attending the trip and those who are responsible
- List of dietary and medical conditions along with medication
- Appropriate cups/bottles for the children and babies
- Nappies, wipes, tissues and spare clothes if required
- Nursery Mobile (fully charged and containing credit)
- First Aid Kit
- Sun cream (with consent) and a sun hat where applicable
- Suitable clothing
- Correctly stored food and drinks (for staff as well as children)
- High visibility jackets

- Reins or buggies if required for specific children.

The Policy is going to be revised and reviewed regularly by the LRP and the Manager.

6. Children's safety

At St. Paul's Childcare and Pre-Learning Centre, we understand the importance of a well-rounded educational and development programme, yet nothing matters more than the safety, security and health of your child. It is imperative for us to provide a healthy and safe environment for your child, as explained in further detail below:

- The Childcare Manager is responsible for health and safety matters concerning the childcare centre.
- All carers and staff are aware of potential hazards within the childcare centre and the surrounding environment and actively protect children from any potential hazards. The staff will ensure that injuries do not occur.
- At St. Paul's Childcare and Pre-Learning Centre all staff is a qualified child care professional with first aid training.
- All accidents and any incidents are recorded in a Child Care Accident/Incident Report' form. All accidents are accurately notified to the parent/guardians as soon as possible.
- We expect our employees to take responsible care of their own health and safety at all times.
- The staff is responsible for locking cupboards and the store room, reporting broken locks or missing keys.
- Hygiene rules relating to bodily fluids are followed with particular care and all staff are aware of how infections can be transmitted.
- The premises are kept well maintained and cleaned on a daily basis routine. We have a full-time cleaner and handy man that are responsible for the cleaning and maintenance. The cleaner has a log book to sign his or her work daily.
- Washing of the premises and toilets are disinfected daily with wiping of all objects used by the children and staff.
- Staff uses disposable gloves in assisting children during potty training and the changing of nappies, or contact with other bodily fluids.
- Nappies are put in nappy disposable bags and in an air tight recipient. Garbage is taken out every evening and nothing is left inside the bins.
- Hand washing is strictly adhered to at all times and children are encouraged to wash their hands after each activity, especially before eating.
- The Management and staff at St. Paul's Childcare and Pre-Learning Centre are all qualified first aiders. St. Paul's Childcare and Pre-Learning Centre also has a fulltime paediatric nurse ('the Childcare Nurse') on board.
- A first aid box is always available which is stocked on a regular basis.
- Only medicines that have been prescribed by a doctor and provided by parents can be given to children in our care. A medical care plan will be completed by parents, recording the timing and dosage of medicines to be given to their child as requested by them. These instructions will be signed, dated and the time noted each time the medication is administered by the Childcare Nurse. All medicines will be stored in the fridge in the centre.
- Additionally, we strictly do not allow the sharing of personal belongings such as beakers, dummies, jackets, hats, amongst others. All personal belongings must be clearly labelled. Pacifiers which are not labelled will be left in the child's bag.

6.1. Emergency and fire evacuation

The centre is equipped with a fire alarm system. In the event of fire, our first priority is to get all children, parents/child carer(s) and visitors out of the building as quickly as possible.

Hereunder, are the procedures we will calmly and diligently adopt should the need arise:

- If a child carer detects a fire, she/he will pull the nearest fire alarm signal (small red box mounted on the wall near the fire exit).
- If it is a small fire, the child carer is required to attempt to extinguish the fire using the nearest fire extinguisher.
- The children are to be evacuated first.
- All children and staff have to exit the building and proceed to the designated meeting place.
- Call 112 as soon as they have reached the meeting place.
- Provide the centre's name and location: St. Paul's Childcare and Pre-Learning Centre, Triq I-iSptar, Guardamangia.
- Describe the location of the fire.

If the fire alarm sounds:

- The child carer will assist in the evacuation of the children from the classroom.
- The classroom's First Aid kit and the Weekly Attendance Sheet form are collected.
- Staff member closest to the outdoor exit is responsible for leading children out that exit and to the designated meeting place.
- Staff member farthest from the outdoor exit is responsible for ensuring everyone has evacuated the classroom.
- The last staff member to exit the classroom must turn off all lights and close all doors.
- Once assembled at the designated meeting place, the child carer is responsible for using the Weekly Attendance Sheet form to ensure all children are accounted for.
- The Childcare Manager will verify, as soon as possible, that all children are accounted for.

Simulated fire drill exercises are practiced periodically.

The Childcare Manager will initiate all drills and maintain records of all drills.

6.2. Healthy Eating Policy

St. Paul's Childcare Centre believes that good health and good food in the early years helps to safeguard children's well-being throughout their lives. It is important that children develop healthy eating habits from a young age for both the pleasure of having a wide variety in their diets and gaining knowledge about nutrition. Our mealtimes are treated as an opportunity for social interaction as well as laying the foundations about making healthy choices. This Healthy Eating Policy is communicated to all Parents/Guardians and guardians.

Guidance for what to include:

Every day:

- At least one portion of fruit and one portion of vegetables
- Meat, fish, or other source of non-dairy protein (e.g., lentils, kidney beans, hummus, falafel)
- A starchy food (e.g., bread, pasta, rice, couscous, noodles, potatoes, or other types of cereals)
- Dairy food (e.g., milk, yoghurt, cheese, or custard) It is recommended that an oily fish (e.g., salmon) should be included around once every three weeks.

Drinks: Only water (still), milk, yoghurt, or milk drinks.

Guidance for what not to include:

- Snacks, such as crisps. Instead, include savoury crackers or breadsticks.
- Confectionery such as chocolate bars and especially sweets. Cakes and biscuits are allowed but encourage your child to eat these only as part of a balanced meal
- Meat products such as individual pies and corned meat should be included only occasionally. Please note that any food which contains sausages or chunks of meat are prohibited since this may cause choking.
- Please note that Grapes should always be cut lengthwise so they can pass more easily through smaller throats. Never slice width wise because they'll still be big enough to choke on. You can either slice them downwards in half, or for small babies, you might want to cut them lengthwise again into quarters.
- Fizzy drinks
- Please be aware that we do have children and team members with severe allergies to nuts – thank you for not including them in your child's packed lunches.

Children are allowed to bring their lunches into the setting in hard plastic boxes which will be sanitised by a designated member of staff on arrival to the nursery during the Covid-19 outbreak.

At St. Paul's Childcare and Pre-Learning Centre, eating represents a social time for children and adults and helps children to learn about healthy eating. Before a child starts to attend our early learning centre, we find out from parents or guardians their children's dietary requirements, including any allergies. We record information about each child's dietary needs in her/his registration record and parents sign the record to signify that it is correct. We regularly consult with parents to ensure that our records of their children's dietary needs - including any allergies - are up-to-date.

In addition to the above, kindly note the following:

- Children do not have specific time to eat but we encourage that every hour children have a snack. During those hours if a child is hungry, he or she will be provided with food.
- We display current information about individual children's dietary needs so that all staff and students are fully informed about them.
- We implement systems to ensure that children receive only food and drink which is consistent with their dietary needs and their parents' wishes.
- Meals should be readily cooked but which are then prepared and heated up to the appropriate temperature. Fruits must be cut, peeled and prepared in a bowl. Moreover, it is our policy that any remaining food will be kept in the same bowl so that the parents would know how much the child ate for that day at the centre unless advised not to do so, in which case the bowl will be returned clean with no remaining food. We may also from time to time provide nutritious food at snacks, avoiding large quantities of fat, sugar and salt and artificial additives, preservatives and colourings.
- We welcome foods from the diet of each of the children's cultural backgrounds, providing children with familiar foods and introducing them to new ones.
- Through discussion with parents and research reading by our dedicated staff members, we obtain information about the dietary rules of the religious groups to which children and their parents belong, and of vegetarians and vegans, and about food allergies. We take account of this information in the provision of food and drinks.

- We require staff to show sensitivity in providing for children's diets and allergies. Staff do not use a child's diet or allergy as a label for the child or make a child feel singled out because of her/his diet or allergy.
- We organise meal and snack times so that they are social occasions in which children and staff participate.
- We use lunch break to help children to develop independence through making choices, serving food and drink and feeding themselves.
- We provide children with utensils which are appropriate for their ages and stages of development.
- We have fresh drinking water constantly available for the children. We inform the children about how to obtain the water and that they can ask for water at any time during the day and during activities.
- We inform parents who provide food for their children about the storage facilities available in the centre.
- We give parents who provide food for their children information about suitable containers for food.
- We have rules about children sharing and swapping their food with one another in order to protect children with food allergies.
- Biting Policy

Biting is not accepted behaviour for toddlers. Biting can be harmful to other children and to staff. This biting policy has been developed with both of these ideas in mind. As a day care, we understand that biting, unfortunately, is a part of a day care setting. Our goal is to help identify what is causing the biting and resolve these issues. If the issue cannot be resolved, this policy serves to protect the children that are bitten. If a biting incident occurs, we are obliged that the parent of the child biting and the parent of the child who was bitten be contacted. Names of the children are not shared with the other parent. Our staff's job is to keep the children safe and help a child that bites learn different, more appropriate behaviour. We do not alarm, hurt, or frighten children; however, we make it clear to the child that bites that this behaviour is unacceptable as it hurts other children.

For the child that was bitten, first aid is given to the bitten child and ice is put on the bitten area. If the skin is broken, the bite is covered. The 'Accident Report' form is filled out by the Childcare Nurse documenting the incident.

For the child that bit, the child carer will firmly tell the child to not bite - The child will be placed in time out for no longer than the child's age (one year old, one minute). The parents are notified by the Childcare Nurse. The 'Accident Report' form is filled out documenting the incident and signed by the carer and manager. Parents of the bitten child and the child that bit are informed by the Childcare Nurse when children are picked up and not immediately. In extreme cases and at the discretion of the Childcare Manager, parents might be informed before.

When biting occurs regularly and repetitively, the child will be shadowed by the Childcare Nurse and the Childcare staff to help prevent any biting incidents. The child will be observed by the classroom staff to determine what is causing the child to bite (teething, communication, frustration, etc.). The Childcare Manager may also observe the child if the classroom staff is unable to determine the cause. The child will be given positive attention and approval for positive behaviour.

When biting becomes excessive, if a child inflicts 3 bites in a short period (a month) or in case the bite is so deep that the skin of another child or staff member is broken or bruised or the bite leave a significant mark, a meeting will be held with the parents to discuss the child's behaviour and how the behaviour may be modified.

If a child once again in a second period inflicts 3 bites in a short period (a month) or a bite by which the skin of another child or staff member is broken or bruised or bite leave a significant mark, the child will be temporarily suspended from the centre.

7. Policy statement

St. Paul's Childcare is committed to ensuring that all staff responsible for the intimate care of children will always undertake their duties in a professional manner. St. Paul's recognizes the need to treat all children with respect when intimate care is given. No child should be attended to in a way that causes distress or pain. The child's welfare and dignity are of paramount importance. Every child's right to privacy will be respected.

The purpose of these procedures is to set out guidelines that safeguard children and staff by providing a consistent approach. Staff providing intimate care must be aware of the need to adhere to safeguarding practices in order to minimize the risks for both children and staff.

No child is excluded from participating in our setting who may, for any reason, not yet be toilet trained and who may still be wearing nappies or equivalent. We work with parents towards toilet training, unless there are medical or other developmental reasons why this may not be appropriate at the time.

We make necessary adjustments to our bathroom provision and hygiene practice in order to accommodate children who are not, yet toilet trained. We see toilet training as a self-care skill that children can learn with the full support and non-judgmental concern of adults.

8. Policy Aims

The aims of our policy and procedures are:

- To safeguard the dignity, rights and well-being of children.
- To ensure that children are treated consistently when they experience personal care.
- To provide guidance and reassurance to staff.
- To ensure that parents are involved in planning the intimate care of their child and are confident that their concerns and the individual needs of their child are considered
- To reassure parents that staff are knowledgeable about intimate care.

9. Definition of intimate care

Intimate care is any care which involves washing, touching or carrying out an invasive procedure (such as cleaning a child after they have soiled themselves) to intimate

Personal areas. In most cases such care will involve cleaning for hygiene purposes as part of a staff member's duty of care.

10. Procedures for supporting children using toilet facilities

- Some of St. Paul's children might be toilet trained and can access the toilet facilities independently when they have need to.
- When a child is using the toilet facilities a staff member will usually wait by the entrance to the bathroom in case the child needs any support.
- The staff member will go into the bathroom to support a child if needed, but they will tell a colleague if they need to enter the toilet facilities for any reason.
- If a child needs support with their personal care, for example wiping themselves; staff members will wear protective gloves to carry out this task. Staff will use the opportunity to encourage the child to develop their self-care skills.
- Children are encouraged to follow good hygiene practices after visiting the toilet, flushing the toilet, washing their hands using soap and water and then drying their hands.

11. Procedures for nappy changing

- Staff members will check children in their care who are in nappies or 'pull-ups' regularly and change them as needed.
- Changing areas are warm and there are safe areas to lay young children if they need to have their bottoms cleaned.
- Each young child has their own nappies, 'pull ups' and changing wipes in their bags on their pegs.
- Staff members put on gloves, visors and aprons before changing starts and the areas are prepared. Disposable paper towel is put down on the changing mat freshly for each child.
- All staff are familiar with the hygiene procedures and carry these out when changing nappies.
- In addition, staff members ensure that nappy changing is relaxed and a time to promote independence in young children.

- Staff members are gentle when changing; they avoid pulling faces and making negative comments about 'nappy contents'.
- Nappies and 'pull ups' are disposed of hygienically. Any soil (feces) in nappies or pull ups is flushed down the toilet and the nappy or pull up is bagged and put in the human waste bin.
- Children are encouraged to wash their hands after nappy changing and staff have soap, sanitizer and disposable paper towels to hand.
- The changing mat and unit are cleaned with antibacterial wipes following every nappy change that takes place.
- Staff members record the date and time the nappy changing took place, who was changed, the reason for changing i.e. the type of nappy (wet or soiled) and their initials on the Changing List on the wall in the bathroom.

- NB If young children are left in wet or soiled nappies/'pull ups' in the setting this may constitute neglect and will be a disciplinary matter. Settings have a 'duty of care' towards children's personal needs.

12. Procedures for changing children who are wet or soiled

- Staff members undertake the changing of children in their care as needed.
- Changing areas are warm and there are safe areas to lay young children if they need to have their bottoms cleaned.
- Each child should have spare clothes in their bags on their shelves.
- Staff members put on gloves and aprons before changing starts and the areas are prepared and sanitized.
- All staff are familiar with the hygiene procedures and carry these out when changing children.
- In addition, staff members ensure that changing is relaxed and a time to promote independence in young children.
- Staff members are gentle when changing; they avoid pulling faces and making negative comments about the child wetting or soiling themselves.
- Any soil (feces) in pants is flushed down the toilet. Pants that have been wet or soiled are rinsed and bagged for the parent to take home. Clothing that is wet or soiled is also bagged to be taken home for washing.
- Children are encouraged to wash their hands after changing and staff have soap and paper towels to hand.
- Staff members record the date and time the changing took place, who was changed, the reason for changing i.e. if they are wet or soiled and their initials on the Changing List on the wall in the bathroom.

13. Protection for children and staff

- Staff members always change children using the appropriate facilities, ensuring privacy for the child while maintaining supervision of staff members undertaking the task.
- Staff members always tell a colleague when they are changing a child for any reason so that they are made aware, and the changing can then be supervised.
- Staff members aim is to avoid being alone with children for the role of safety and secure of both.

13.1. Potty Training

Day-care Potty Training:

This should be discussed with the parents in advance. We will let them know if we have noticed their child showing readiness. Parents will have their own views on how the process should work and we will follow their wishes.

Some parents believe a child should have a little potty/chair; others feel a seat that fits on the regular toilet is a better system.

Regardless of which way the parents prefer, we will make sure that everything is handled at home and in day-care the same way. Easy to remove clothes should be worn both at day-care and at home. Any reward system must be consistent in both places. Making everything similar is much less confusing for the child and will make the whole process of potty training much easier.

Start Slowly...

We will start slowly, perhaps by taking the child to the toilet once a day. After a few days, we will take them 2-3 times during the day. The children will be asked periodically during the day if they must go. The best way found is to keep the whole process pretty low key. Children who are ready are generally eager to please you and get it right. Rewards can be offered for using the potty chair.

Usually, the process from beginning to end takes a few months.

The potty-training experience should be a positive one. We will make sure the child knows that we are pleased with their progress.

Here in St. Paul's Childcare Centre, we take care about that potty-training experience to start as smooth as possible, working alongside with our parents.

14. Sick Child and Accident Management

14.1. Unwell children

- It is our policy not to accept sick children at the centre. Sick children will be sent home and a medical certificate needs to be presented to confirm when the child is fit to attend childcare.
- A child who is unwell is expected to be kept at home and should not be brought at the centre under any circumstances. Consequently, we expect parents and guardians to cooperate with us by not bringing children to the centre if they have any infectious or contagious illness. Moreover, staff will also be asked not to attend work under the same circumstances.
- If a child becomes ill, we will take every step possible to contact parents immediately. However, if this is not possible, we will take appropriate measures to care for the child.
- The sick child will be kept in a sick bay while being taken care by a carer until the parents collect their child.
- Parents need to call the centre 2 hours before the child is scheduled to start the day at the centre, in order to notify us that the child will not be attending. We require a medical certificate in order for the child to attend childcare.
- Parent/s or guardian/s has/have to present a medical certificate when a child is sick for more than 1 day in order to be allowed back in the childcare centre.

14.2. Procedure to be followed in the event of an accident

The following procedure should be followed in case of an accident:

- If a child or a member of staff is involved in an accident at the centre, they will receive immediate first aid by the Childcare Nurse.

- Gloves will be worn when dealing with blood or any other bodily fluids.
- The wound will be cleaned with sterile cloths or a cold compress applied. No ointments or plasters can be used.
- In the event of an accident to a child and the child will require medical assistance, parents will be informed immediately by the Childcare Nurse of the Childcare Manager.
- If hospital intervention is required, the Childcare Nurse of the Childcare Manager will take the decision to make the necessary arrangements accordingly and call 112 for an ambulance.
- Any accident will be recorded in the 'Child Care Accident/Incident Report' form by the Childcare Nurse. It will state the time of the accident, date, how it happened, first aid given and will be signed by the staff and parent/guardian.

15. Behaviour Management

St. Paul's Childcare and Pre-Learning Centre's carers and staff are trained to be very positive at all times towards the children, towards each other and towards the childcare centre. Any issues or problems arising with children, other members or staff or parents/guardians should be discussed in private with the Childcare Manager. The passing of negative comments about parents, other staff or children is not acceptable in any other forum.

We notice that sometimes children will pick up speech habits from their parents, and may use speech which is inappropriate. If this happens the parent must be contacted immediately and the difficulty pointed out. The parent must be requested to work with the child to show the child that the comments the child has made are not acceptable within the school.

The staff members ensure that children are not bullied or threatened while in their care.

Children are not given physical punishment nor are they exposed to intellectual, emotional or verbal abuse.

The staff members work in a respectful and courteous partnership with parents and children to promote positive behaviour.

15.1. Disciplinary methods

When a child does something inappropriate:

- The carers will address and respond to a child's difficult behaviour in a firm, caring and sensitive manner that promotes positive interactions between the carer and child and between the child and the other children.
- The carer explains to the child why, what he/she was doing was wrong.
- Shows positive guidance.
- The child will be re-directed to other positive behaviours.
- The carer helps the child to foster the ability to become self-disciplined.
- Children will receive positive reinforcement when they show positive behaviour.

15.2. Prohibited Discipline

The following disciplinary acts are prohibited at St. Paul's Childcare and Pre-Learning Centre:

- No corporal punishment such as hitting, spanking or beating.
- No negative reinforcement.
- No threats of corporal punishments.
- No abusive language.
- No force feeding.
- No form of public humiliation.
- No emotional, verbal, physical or any form of abuse will be tolerated in the centre.

16. Child Protection

When parents or guardians sign our registration form, they are abiding to all our policy manual and also our child protection policy form.

The Childcare Manager shall explain to the parents or guardians that if any staff member has any suspicion regarding any form of child abuse, after first consulting with the Childcare Manager, it is reported to the child protection unit at Appoġġ on 179.

If a child arrives with injuries, the parent/guardian should inform our carers and staff members.

If our carers and staff members will notice the injuries as soon as the child arrives or noticed during other times such as nappy changing since some injuries could be either easily seen or hidden (back, shoulders etc.):

- If possible, ask the parent/guardian how the injuries occurred.
- Explanations, however puzzling, should be accepted and accusations should not be made.
- Make a written record, including diagrams, of observations and explanations given. Have a witness wherever possible. This recording of information is to ensure that reasonably full and clear information is obtained.

If the staff suspects that the injuries have been caused by assault or by failure to protect child, the Childcare Manager will report to Agenzija Appoġġ on 179.

Our staff will ensure that any documentation relating to suspected abuse or neglect is stored in a secured locked area and released only to authorized persons under legal request.

17. Children's Personal Records

Children's personal records include the following:

- registration and admission forms,
- signed consent forms,
- correspondence concerning the child or family,

- an ongoing record of relevant contact with parents,
- observations by staff on any confidential matter involving the child, such as developmental concerns or child protection matters.

These confidential records are stored in a lockable cabinet and are kept secure by the Childcare Manager in a suitably safe place.

Parents have access to the files and records of their own children but may not have access to information about any other child.

Staff will not discuss personal information given by parents with other members of staff, except where it affects planning for the child's needs. Staff induction includes an awareness of the importance of confidentiality in the role of the key person.

For more information on when your child's personal data is collected by at St. Paul's Childcare and Pre-Learning Centre, how your child's personal data is recorded and stored, and how is it handled, and who has access to it, please refer to our **Data Protection Policy** on page 30.

18. Transition

At St. Paul's Childcare and Pre-Learning Centre, we will always endeavour to make any move for the children as smooth as we are aware that children are especially sensitive to changes in routine, new environments and to separation from their parents or guardians. Children might experience separation anxiety when placed into the care of someone with whom they are not familiar. Therefore, we have developed a highly effective, developmentally appropriate plan for transitioning children into our early learning centre and, once they have entered our program, from one class to another.

Our aim is that all children will be happy and confident, and we therefore encourage parents to bring children at the centre and visit. On the first visit, the child's parents or guardians will be asked to stay with their child and also discuss their child's routine, likes and dislikes.

After the first initial visit, the parent/guardian will be encouraged to leave their child for a short period of time to see how they settle at the centre. The number and time of visits will be different for each child as all children adapt to different environments differently.

18.1. Daily transition

Some partings are especially tearful, and parents are always welcome to call anytime to see how their children are doing.

When parents drop their children, they can stay in the childcare centre until they feel comfortable to leave their child. The child is told by the parents that he or she will be picked up soon.

Parents will be supplied with a daily report of the child to facilitate the transition from our childcare centre to their homes.

18.2. Children who will be moving to kindergarten

We will ensure that the children are informed about moving onto school through stories, pictures and circle time.

In order to facilitate the children's transition to school, we recommend that the child's assessment portfolio is passed to the child's new teacher so that she/he will be informed about the child's activities and milestones.

18.3. Children with additional needs

We will ensure that the child's assessment portfolio and all other relevant information regarding the child's additional needs is passed on to the parents/guardians which is necessary to the child's new teacher/school. The assessment portfolio will include information about the child's progress and routines. Moreover, where necessary, we are willing to have a transition meeting with the new teacher/s to pass on all relevant information, to ensure that the child's needs are still being met.

Additionally, at St. Paul's Childcare and Pre-Learning Centre, we will always endeavour to make any move for the children as smooth as possible and will also assist the child and their parents with any transition required, including, moving to a new school, another nursery or moving house.

19. Uncollected children

St. Paul's Childcare and Pre-Learning Centre has an obligation to stay with any uncollected child at the end of the day, until that child is collected.

We will not release the child to an unauthorized person, even if the collection is late, unless an authorized person telephones to state that because of an emergency a different person will be collecting.

The authorized person should give the name and address and an ID card number of the unauthorized person and the Childcare Manager shall check this description before permitting the child to leave.

A record will be kept in the register of all children who are not collected by the due time. This will note the date, the time at which the child was collected, who collected the child, and the reason given.

Our carers will reassure the child that his or her parents/guardians are on their way in the event of a delay.

In the event that a child is not collected by the due time on three occasions in one year the parent will be written to by the Childcare Manager, pointing out the difficulties late collection causes the preschool, and either:

- Informing the parent that the child will not be able to attend St. Paul's Childcare and Pre-Learning Centre any further if this happens again, or
- Informing the parent that they will be charged for every hour that the child is left on the premises after the final collection time.
- In the event of a parent or designated person failing to collect a child, every effort must be taken by the registered person to contact that person as soon

as possible. If all attempts to contact a parent/guardian, designated person or emergency contact fail, the registered person should inform the police to become in charge of the situation in helping to trace the parent/guardian of the child.

20. Staff Recruitment Policy

At St. Paul's Childcare and Pre-Learning Centre, we are committed to provide the highest standard of service through committed, dedicated and skilled employees. To support the achievement of this objective we recognise the importance of employing the most suitable applicants for all our vacant positions. St. Paul's Childcare and Pre-Learning Centre supports the appointment of staff with diverse backgrounds in order to reflect our strategy and goals and most importantly generates an enthusiastic and secure environment for all children at the centre.

In this regard, when a suitable applicant with relevant childcare experience and/or qualifications applies for an advertised job, we will arrange for the applicant to come at our offices for an interview. At interviewing stage, we will go through the applicant's past work experience. We will also discuss in detail with the applicant his/her aims and objectives.

Furthermore, the applicant must satisfy the following criteria pursuant to the National Standards for Child Day Care Facilities:

- Must have reached the legal age of majority (the age is currently 18).
- Have a minimum of 2 years of experience in childcare/preschool education.
- Provide original certificates relating to all necessary qualifications and certificates. (Applicants must possess a childcare diploma level 4 and a current CPR and first aid course).
- Provide a clean police conduct.
- Provide details of two different referees covering at least the past two years of experience – one of which must be a current or previous employer.

As part of the recruitment policy, in order for child carers to commence working at St. Paul's Childcare and Pre-Learning Centre undergo a thorough screening process to ensure they are fully qualified and adequate for their role.

21. Staff Development

Our carers and staff are encouraged to engage in on-going training; to attend refresher courses in First Aid to maintain their certification and to attend seminars related to childcare at least once a year. The purpose of staff learning and development is to enable staff, individually and collectively, to enhance their knowledge, expertise and skills in order to enable them to fulfil their job role effectively and support progression. We encourage staff to self-reflect and identify their own development requirements and aspirations as well as being supported in this process by their Childcare Manager.

In addition to the above:

- A staff induction programme is held for all new employees. During the induction training all newly appointed staff/students are provided with the centre's policies and procedures.
- Opportunities for training in manual handling and food safety, as well as fire safety training are made available to all staff.
- Staff members are given the opportunity to share the knowledge gained from the course/training they have attended.
- Fortnightly meetings are held with management and staff in order to discuss operational issues and also to encourage and to provide a mechanism for sharing of new creative ideas for the improvement of the quality of the service offered to the children and their families.
- Staff training needs analysis is carried out and reviewed on a regular basis to establish training requirements.

22. Staff Supervision

St. Paul's Childcare and Pre-Learning Centre is committed to ensuring that every staff member receives effective supervision by team leaders and the Childcare Manager on a daily basis. Adequate supervision entails that staff are aware of individual children's developmental stages and how this affects the way they interact with materials and equipment.

The Childcare Manager is responsible for developing the staff effectively, ensuring that they receive regular quality supervision, clearly stating and agreeing expected work standards and ensuring training and development opportunities are identified, facilitated and evaluated. This is done on a quarterly basis. A record of the planned supervision session is given to the staff member and the other copy is securely kept by the Childcare Manager.

Staff Supervision provides an opportunity to:

- Monitor progress of staff with the objectives agreed at the annual appraisal, in line with the organisation mission statement.
- Reflect on the effectiveness of recent training and development activities contributing to workplace competence and identify any outstanding needs.
- Provide feedback on performance.
- Provide support, direction, advice and guidance on individual cases, staff and management issues.
- Develop skills and understanding.
- Ensure policy and standards are met consistently in practice.
- Discuss any external/personal circumstances that may have a bearing on work procedures.

Each carer and staff member shall:

- Take responsibility for their own performance and learning, ensuring it is integrated into their everyday practice.
- Reflect and learn from their work experience, training and development opportunities.
- Prepare for and take part in supervision under the arrangements agreed.

- Take any action agreed during supervision, to improve performance and enhance their effectiveness.
- May be asked by the Childcare Manager to provide training to fellow colleagues.

The Childcare Manager may also provide unplanned supervision of staff members as may be required from time to time.

23. Staff Record Keeping

The centre is committed to ensuring that a consistent system of record keeping is in place and sustained as the centre develops, to the benefit of both the centre and all members of staff. Procedures for staff records keeping include the following:

- Relevant details of all members of staff are held in confidence. Consequently, access to staff records is limited only to the centre's Legally Responsible Person, the Childcare Manager and the individual themselves. Staff details including contract of employment, appointed position and salary are strictly kept by the Legally Responsible Person.
- Details of salary adjustments are held strictly by the Legally Responsible Person.
- Records of individual members of staff are held for a period of ten years pursuant to the centre's legal obligations.
- Roasters, sick leave and vacation leave papers are all treated with confidentiality and kept in the office.

24. Whistle blowing

This policy is aimed to safeguard children from any type of abuse at the centre. Neglecting serious cases of abuse means neglecting one's professional duties. If any member of the staff notices any form of abuse which might be committed within the centre by any other staff member or student the staff member has the rightful duty to report the incident to the Childcare Manager. Thus, it is imperative that carers take the appropriate action when there is a strong probability of abuse. The staff may be assured that management will not take any action against any staff member reporting such instances of inappropriate behaviour.

Reports may also be forwarded to the Department of Social Welfare Standards, 469, St. Joseph High Road, St. Venera, SVR1012, Malta. T:(356)22788000, or the Child Protection Services on Support Helping 179.

25. Complaints Policy and Action Plan

St. Paul's Childcare and Pre-Learning Centre believes that children and parents are entitled to expect courtesy and prompt attention to their needs and wishes. We welcome suggestions on how to improve St. Paul's Childcare and Pre-Learning Centre and we even provide a suggestion box.

We anticipate that most concerns will be resolved quickly by an informal approach. If this does not achieve the desired result, we have a set of procedures for dealing with concerns.

The parents or guardians may pass on his/her complaint to the Childcare Manager or the Legally Responsible Person. The complaint is discussed in privacy in the office. If this does not have a satisfactory outcome or if the problem recurs the complaint is manifested in writing to the manger and addressed to the director. If the complaint is not resolved the complaint will enter into a centre complaint form and meeting is held with the parent, Childcare Manager and the director of St. Paul's Childcare and Pre-Learning Centre. The director will take the final decision and the complaint and resolution are signed by all parties.

The parents or guardians may also log in the DQSE website link-<https://education.gov.mt/en/dqse/Pages/Complaints.aspx> and lodge a complaint with the DQSE directly.

26. Data Protection Policy

St. Paul's Childcare and Pre-Learning Centre strives to comply with applicable laws and regulations related to Personal Data protection in Malta. This policy document outlines the basic principles by which St. Paul's Childcare and Pre-Learning Centre handles personal data of parents, children, suppliers, employees and other individuals who are involved with the service.

This policy provides rules and procedures which apply to all individuals within St. Paul's Childcare and Pre-Learning Centre aimed at ensuring all personal data is processed and protected properly. All parents, guardians, employees, contractors, and suppliers and are responsible to read and understand this document, so they are familiar with the policy of St. Paul's Childcare and Pre-Learning Centre. This document is available to childcare centre's employees, parents, and guardians.

There are certain legal documents that are relevant to this policy and we refer to these documents throughout. For your information these documents are listed below:

- EU GDPR 2016/679 (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC)
- the Data Protection Act, Chapter 586 of the Laws of Malta

26.1. Definitions

Key definitions of terms that are used in this document for your information are below. They are specifically drawn from Article 4 of the European Union's General Data Protection Regulation:

Personal Data

Any information relating to an identified or identifiable natural person ("Data Subject") who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Sensitive Personal

Data Personal data which are, by their nature, particularly sensitive in relation to fundamental rights and freedoms merit specific protection as the context of their processing could create significant risks to the fundamental rights and freedoms. That personal data includes data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or sexual orientation.

Data Controller

The natural or legal person, public authority, agency or any other body, which alone or jointly with others, determines the purposes and means of the processing of personal data.

Data Processor

A natural or legal person, public authority, agency or any other body which processes personal data on behalf of a Data Controller. Processing An operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of the data.

26.2. General Principles for Processing Personal Data

St. Paul's Childcare and Pre-Learning Centre is considered a Data Controller and therefore is responsible for the data it obtains. St. Paul's Childcare and Pre-Learning Centre is responsible to demonstrate compliance with the data protection principles as listed below when handling personal data.

Lawfulness, fairness, and transparency

Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject. Data subjects must be told what processing will occur, the actual processing must match this description and the processing must match the purposes specified in the GDPR. St. Paul's Childcare and Pre-Learning Centre relies on GDPR fundamentals which are contractual and consent for processing for the majority of the data processing it undertakes.

Purpose Limitation

Personal data is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. St. Paul's Childcare and Pre-Learning Centre is transparent about information collected and what it is used

for. St. Paul's Childcare and Pre-Learning Centre ensures the personal data it holds is used for the intended purposes only. This is conducted through our privacy notice, our terms and conditions and our consent forms.

Accuracy

Any personal data that is being held needs to be accurate. Changes in your personal information should be advised to the Childcare Manager. If a data subject believes any personal data held is incorrect, they can request to have the information rectified by a data subject access request.

Storage period limitation

Personal data will be processed and stored in the branch at which a child attends or an employee works and in head office. Data will be held for no longer than is necessary considering the purposes of the processing activities. After this period, personal data will be destroyed as per St. Paul's Childcare and Pre-Learning Centre's Data Retention Policy.

Integrity and confidentiality

Only authorised persons have access to the personal data which St. Paul's Childcare and Pre-Learning Centre collects. Only those that require access should have it. The physical security of the filing cabinets and rooms are considered and locked when not in use. Some data is required in the child's classroom such as dates of birth, medical and allergy information and information for legal guardian contact information. This information needs to be in the classroom as practitioners need it to hand for operational reasons but must ensure to take all reasonable measures to keep it safe (e.g., Put folder with information in a cupboard out of sight, put cover page on front of allergy list in classroom). Access to electronic devices that hold personal data are restricted to the staff whom use them on a regular basis. St. Paul's Childcare and Pre-Learning Centre uses appropriate technical, organisational and administrative security measures to protect all personal data we hold.

Accountability

St. Paul's Childcare and Pre-Learning Centre is responsible for compliance with the principles outlined above. The Childcare Manager is responsible for auditing how well individual rooms and areas of branch implement this policy. Regular checks are carried out on the implementation of this policy. Any individual who breaches this policy may be subject to internal disciplinary action and may also face civil or criminal liability if their action violates the law. Third-party contractors whom provide St. Paul's Childcare and Pre-Learning Centre with services, should have a contract of services in place. The contract outlines that personal data processed by the third party is being done so in compliance with GDPR and adequate security measures to safeguard personal data are taken.

Building Data Protection into the St. Paul's Childcare and Pre-Learning Centre Services

In order to demonstrate compliance with the principles of data protection, St. Paul's Childcare and Pre-Learning Centre aims to build and engrain data protection into its day-to-day activities.

Notification to Data Subjects

For the purpose of transparency of all processing of personal Data Processing, all parents/ legal guardians of a child and all employees are furnished with a privacy notice.

Choice and Consent

St. Paul's Childcare and Pre-Learning Centre may process personal data for a legitimate purpose as detailed in the privacy notice and generally it may do so without obtaining the consent of the data subject to improve the efficiency of internal operations such as for writing a letter to parents or employees, fees collection or for personnel management activities. St. Paul's Childcare and Pre-Learning Centre shall seek further consent if applicable.

Collection of Data

St. Paul's Childcare and Pre-Learning Centre strives to collect the least amount of personal data possible. Collection of personal data should be obtained from the data subject, directly so consent can be given prior to the collection of data. St. Paul's Childcare and Pre-Learning Centre will furnish the data subject with a privacy statement letter and consent form to ensure they are familiar with what data is collected and for what purposes it is used.

Using the Data, Retaining the Data and Disposing of the Data

St. Paul's Childcare and Pre-Learning Centre maintains the accuracy, integrity, confidentiality and relevance of personal data based on the processing purpose. Adequate security mechanisms designed to protect personal data are used to prevent personal data from being stolen, misused, or abused, and prevent personal data breaches.

Access

St. Paul's Childcare and Pre-Learning Centre must provide reasonable means for data subjects to access their own personal data and allow data subjects to update, correct, erase, or transmit their personal data if appropriate or required by law as reflected in the Subject Request Procedure.

Data Portability

Data subjects have the right to request, a copy of the data they provided to us in a structured format and to transmit this data to another controller. The Data Protection Officer is responsible to ensure that such requests are processed within one month, are not excessive and do not affect the rights to personal data of other individuals.

Cross-border transfer of Personal Data

Before transferring personal data out of a country, the company and individuals must consider whether the cross-border transfer is necessary or legal. When transferring personal data out of the European Economic Area, the transferred and the transferee must have signed a data transfer agreement in compliance with EU regulations and Cross Border Data Transfer Policy. The transfer must provide adequate protection for the data transferred in accordance with the data transfer agreement.

Right to be Forgotten

Upon request, data subjects have the right to request the erasure of their personal data. This must be done only in compliance with any legal or statutory obligations. For example, there may be legal requirements for St. Paul's Childcare and Pre-Learning Centre to retain certain personal data. If a data subject requests the file to be erased, St. Paul's Childcare and Pre-Learning Centre have the right to retain that information and not erase it based on such legal obligations.

Response to Personal Data Breach Incidents

The responsibility for ensuring appropriate personal data processing lies with everyone who works for or with St. Paul's Childcare and Pre-Learning Centre and has access to personal data processed by St. Paul's Childcare and Pre-Learning Centre. St. Paul's Childcare and Pre-Learning Centre strives to ensure confidentiality in all of our communications. When St. Paul's Childcare and Pre-Learning Centre learns of a suspected or actual personal data breach, an internal investigation will take place and appropriate remedial measures taken in a timely manner, in accordance with the Data Breach Policy.

26.3. Information we collect

The data that we may collect about you and your child include:

- Your name and surname
- Your child's name and surname
- Your email address
- Your contract details
- Your child's dietary requirements
- Your child's health history

26.4. Basis of processing

We will process personal data on the basis of:

- Our legal obligations (for example, to comply with Ministry of Education regulations);
- Necessity for the performance of a contract which you have asked us to enter into, or in order to take steps at the request of prospective clients prior to entering into a contract;
- Our legitimate interests (for example, to ensure we are providing you with the best possible service, to manage our customer database efficiently and to improve and ensure the security of our systems).

26.5. Conflicts of Law

This policy is intended to comply with the laws and regulations in Malta in which St. Paul's Childcare and Pre-Learning Centre operates. In the event of any conflict between this policy and applicable laws and regulations, the latter shall prevail.

Review

This policy will be reviewed annually or as necessary to reflect changes in legislation.

26.6. Data Subject Access Request Procedure

Under the GDPR, all individuals have a right to request access to their own personal information. This procedure outlines how St. Paul's Childcare and Pre-Learning Centre responds to and handles requests made by individuals for access to their personal data.

This ensures compliance with GDPR and transparency for all parties. All employees, contractors, volunteers and students are responsible to read and understand this document, so they are familiar with the policy of St. Paul's Childcare and Pre-Learning Centre. This document is available to employees, parents and guardians.

26.7. The Rights of a Data Subject

If personal information is being processed, a data subject i.e., an individual has the following rights:

- To know whether a data controller holds any personal data about them.
- To know the nature of the data held about them.
- To be informed of the reason(s) for which their data is being processed, and from where it was received.
- To be informed whether the information is being disclosed to anyone apart from the original recipient of the data; and if so, the identity of those recipients.
- The right to data portability. Data subjects can ask that their personal data be transferred to them or a third party in machine readable format. However, such requests can only be fulfilled if the data in question is: 1) provided by the data subject to the service, 2) is processed automatically and 3) is processed based on consent or fulfilment of a contract.
- If the data is being used to make automated decisions about the data subject, to be told what logic the system uses to make those decisions and to be able to request human intervention.
- The right to rectify incorrect personal data that is held.
- The right to erase personal data. This is only applicable in certain circumstances and is not an absolute right. The data subject can request erasure of their personal data if:
 - the personal data is no longer necessary for the purpose which you originally collected or processed it for
 - If you are relying on consent as your lawful basis for holding the data, and the individual withdraws their consent

Data Subject Access Request

A Data Subject Access Request is any request made by any individual (e.g., by a parent/guardian or by a parent/guardian on behalf of their child) for information held about them by St. Paul's Childcare and Pre-Learning Centre. A Data Subject Access Request form must be filled out by any individual wishing to access data. This form is available from the centre's Data Protection Officer. All data subject request forms must be submitted to the Data Protection Officer in writing to Head Office. Verbal requests for information held about an individual will not be considered as valid requests.

Right to Lodge a Complaint

You also have the right to lodge a complaint with the Information and Data Protection Commissioner in Malta as the data protection supervisory authority:

Information and Data Protection Commissioner

Level 2, Airways House

High Street

Sliema SLM 1549

Malta

Tel: (+356) 2328 7100

Email: idpc.info@idpc.org.mt

26.8. Marketing

If you are a customer, from time to time, we may wish to contact you about products and/or services which you have purchased or shown interest in. We may also contact you if you are not yet a customer, but you have given us your consent to send you marketing material to keep you up to date on our products and services.

You have the right to ask us to stop sending you marketing material at any time.

You can stop receiving marketing messages from us at any time through any of the following methods:

- By clicking on the 'unsubscribe' link in any email we send you;
- By contacting us at the postal or email addresses at the top of this page.

This will not affect any processing that took place prior to the withdrawal of consent. Please note that, it may take a few days for all our systems to be updated, so you might get messages from us while we process your request.

Please also be aware that if you ask us to stop sending you marketing material, we will still continue to contact you in relation to the service we have been engaged by you to provide (for example, to send you a quote, bill, updates on your children, etc), if this is necessary for us to provide the service.

27. Centre Operations and Management

27.1. Our opening hours

St. Paul's Childcare Centre is open from 05.00 am until 8.15 pm, Monday to Saturday.

27.2. Payment of Fees

Parents are requested to pay the monthly fee in advance and discuss with the centre's Childcare Manager, the best package that meets their requirements.

Packages are provided as follows:

Hourly packages per month	Rate in EUR per hour
60 hours	€4.50
80 hours	€4.30
100 hours	€4.15
Any amount above 105	€4.00
Sundays and Public Holidays	€6.20

2nd Sibling booking has a 25% discount rate.

27.3. Notice of withdrawal

A 30-day notice period is required should you decide to discontinue from sending the child to the centre, otherwise parents will still be charged for the following month. • Hours cannot be transferred for the following months.

Fees are non-refundable.

28. Contents of Night ECEC Service Policy

Policies which guide the centre's practices and procedures that must be followed during night service. This should include information related to:

29. Child protection

As mentioned earlier in this document for the day service, it is important that both the manager, and all the childcare educators (including all employees) have official POMA clearance which will be needed to be renewed annually for the Night ECEC service provision.

This policy is to provide clear guidelines in relation to the physical contact considered appropriate for night time routines and when attending to the children's hygiene needs as follows:

- Attending to the child's hygiene needs accordingly, especially in those instances when a child fails to settle to sleep or becomes distressed, including procedures regarding bedwetting, nightmares or general distress
- Bottle-feeds are given to the children before going to bed
- Sleeping areas must have operational baby monitors on going all the time
- Observation of children at 10-minute intervals whilst sleeping in these rooms and sleeping time is recorded accordingly

- Childcare educators must go into the rooms to physically check and monitor babies breathing.
- Sleeping bags for babies are encouraged, thus to avoid risks for the child's face being covered. Clothing is important to be fitted around the neck and armholes.
- Cots have security locks on their sides into place to ensure children's safety
- Turn off heaters before children use the room for sleeping.
- Cot rooms will be air conditioned and maintained at the standard temperature.
- Manual handling practices when lifting babies in and out of cots must be ensured at all times
- No prams/strollers are used for sleeping since they do not carry safety codes for sleep
they are not safe substitutes for a cot
- Cot mattresses are kept in good, clean and firm condition; they should fit the cot base with not more than a 20mm gap between the mattress sides and ends.
- Pillows and loose bedding or fabric, lamb's wool, bumpers and soft toys from cots are removed
- Babies are placed on their back to sleep
- When babies continuously roll from back to front and back again on their own, they can be left to find their own desired sleep or rest position (this is usually around 5–6 months of age)
- Babies aged younger than 5–6 months, and who do not tend to repeatedly roll from back to front and back again on their own, should be re-positioned onto their back when they roll onto their front or side
- If a medical condition exists that prohibits the babies from being placed on their back, the alternative practice should be confirmed in writing with the Service, by the child's medical practitioner
- Four months old babies can generally turn over in a cot
- Bedding needs to be tucked in securely and is not loose
- Safe baby sleeping bags are recommended (i.e. with fitted neck and arm holes, but no hood). At no time should a baby's face or head be covered (i.e. with linen)
- Arms are left free once the startle reflex disappears at around three months of age and discontinue the use of a wrap when the baby can roll from back to tummy to back again (usually four to six months of age)
- Use only lightweight wraps such as cotton or muslin
- If being used, a dummy should be offered for all sleep periods
- Dummy use should be phased out by the end of the first year of a baby's life
- If a dummy falls out of a baby's mouth during sleep, it should not be re-inserted.

30. Safe sleep practices, sleeping arrangements and procedures

- Children have different sleep, rest and relaxation needs.
- The important factors in ensuring a child feels safe and secure.
- Children have different sleep patterns and should be respected.
- Children of the same age can have different sleep patterns

- Every child's comfort must be provided for and there must be appropriate opportunities to meet each child's sleep, rest and relaxation needs.
- Our Service defines 'rest' as a period of inactivity, solitude, calmness or tranquillity, and can include a child being in a state of sleep.
- Considering the busy and energetic nature of children's day, we feel that it is important for children to participate in a quiet/rest period during the day in order to rest, relax and recharge their body.
- Effective rest strategies are important factors in ensuring a child feels secure and safe in an early childhood environment.
- Our Service will consult with families about their child's individual needs, ensuring they are aware of the different values and parenting beliefs, cultural or opinions associated with sleep requirements.

31. Bedtime routine including information regarding screen time

- Communication needs to be done with the child's parents/guardians regarding their child's sleeping or rest times and the service routine regarding sleep and rest times
- Negotiate sleep and rest patterns and practices with families to reach agreement on how these occur for each child at our Centre.
- According to the World Health Organisation (WHO) recommendations (2019), limiting screen time will result in healthier adults.
- Promote more reading and storytelling instead of screen time.

32. Supervision of children

- Children should be supervised at all times as indicated in the National Standards for Early Childhood Education and Care Services (0-3 years) Standard 1.3
- At all times, reasonable precautions and adequate supervision ensure children are protected from harm and hazard
- Maintain adequate supervision
- Assess each child's circumstances and current health to determine whether higher supervision levels and checks may be required
- That supervision window (or similar) will be kept clear to ensure safe supervision of sleeping children
- Childcare needs to be designed to facilitate supervision
- Observation of children at 10-minute intervals whilst sleeping in these rooms and sleeping time is recorded accordingly

33. Managing difficulties around sleeping habits

- Ensure that each child's comfort is catered for
- Appropriate opportunities to meet each child's need for sleep, rest and relaxation
- Ensure that children who do not wish to sleep are provided with alternative quiet activities and experiences, while those children who do wish to sleep are allowed to do so, without being disrupted.
- If a child requests a rest, or if they are showing clear signs of tiredness, regardless of the time of day, there should be a comfortable, safe area available for them to rest (if required).
- It is important that opportunities for rest and relaxation, as well as sleep, are provided.
- Consider a vast range of strategies to meet children's individual sleep and rest needs Respond to children's individual cues for sleep (yawning, rubbing eyes, disengagement from activities, crying etc)
- Acknowledge children's emotions, feelings and fears
- Develop positive relationships with children to assist in settling children confidently when sleeping and resting