



# QUALITY ASSURANCE POLICY

2025 - 2026

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| <b>Document Title</b>   | <b>Quality Assurance Policy</b> |
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## Small Steps Quality Assurance Policy

### 1. Policy Statement

At Small Steps, we are dedicated to delivering consistent, high-quality, and child-centered services in Applied Behavior Analysis (ABA) and educational inclusion across all partner schools. Our Quality Assurance framework is rooted in evidence-based practice and guided by internationally recognized clinical and educational standards. We prioritize fidelity to intervention, equity in service delivery, and best-practice implementation to ensure that every child receives individualized and effective support tailored to their unique needs.

In alignment with our commitment to continuous improvement and accountability, we have expanded the scope of our policy to include compliance, stakeholder engagement, and safeguarding. Small Steps' policies and procedures are designed to ensure full compliance with the standards set by the Community Development Authority (CDA) and are aligned with the broader policies of GEMS Education. This integrated approach ensures that quality is upheld not only in therapeutic and instructional practice but also across all operational, collaborative, and protective dimensions of our service.

### 2. Purpose

**This policy aims to:**

- Provide a unified framework to guide clinical practices, monitor progress, and uphold service standards across all partner schools and teams.
- Ensure consistency and quality in programming, data reporting, and service delivery across all Small Steps classrooms.
- Ensure that students receive effective, individualized interventions that meet both behavioral and educational goals.
- Promote a culture of continuous improvement through structured monitoring, supervision, and stakeholder feedback.
- Align with regulatory requirements, ethical standards, and GEMS Education safeguarding and academic quality frameworks.
- Promote data-driven decision-making to ensure interventions are informed, measurable, and responsive to student progress.

### **3. Scope**

This policy applies to all Small Steps personnel, including Program Director, Certified Behavior Analysts, ABA Therapists, and Administrative Staff operating within our classrooms across several schools in Dubai.

### **4. Quality Assurance Framework**

The QA framework is structured around five core components that guide the consistency, effectiveness, and accountability of our service delivery. These components are integrated to uphold the standards of evidence-based practice, child-centered programming, and regulatory compliance across all sites.

#### **4.1 Student Programming and Individual Progress**

- All students undergo a comprehensive intake process, including structured observation, behavioral, and developmental assessments.
- Individualized Intervention Plans are developed by certified behavior analysts, based on outcomes of standardised assessment tools and are reviewed each academic term to evaluate progress and plan future programming.
- Progress Reports are written and shared with families every term, supported by visual data analysis and narrative updates.
- Students' Inclusion Schedules are reviewed and revised regularly, in collaboration with the School Inclusion Team, to evaluate readiness for increased inclusion, and/or adjust scheduling based on success or challenges in mainstream lessons.

#### **4.2 Staff Competency and Supervision**

- All team members are required to complete an initial onboarding program, which includes comprehensive training on Small Steps policies and procedures, daily operational protocols, and clearly defined roles and responsibilities within the organization. This ensures that all staff are equipped with the foundational knowledge necessary to provide consistent, high-quality services from the outset.
- Mandatory Safeguarding training is also provided as part of onboarding, covering key topics such as child protection, GEMS safeguarding standards, and Small Steps' internal policies and procedures for identifying, responding to, and reporting safeguarding concerns and incidents. Annual safeguarding refresher courses are required for all team members to maintain compliance and stay current with evolving standards and best practices.
- Therapists are supervised weekly by Certified Behavior Analysts. Supervision includes direct observation, feedback sessions, and skills training.

- Performance reviews are conducted monthly and include evaluations of professionalism, data integrity, behavior management, and communication skills.
- Inter-therapist/Inter-supervisor fidelity checks are periodically conducted across sites to ensure consistency of practice.

### 4.3 Data Collection and Documentation

- Personal data is handled in accordance with General Data Protection Regulation (GDPR) standards, ensuring that all data is collected, stored, and shared securely, lawfully, and transparently.
- Small Steps upholds cybersecurity standards by utilizing secure, encrypted platforms (e.g., HiRasmus and PhotoCircle) that comply with recognized data protection protocols. These systems are selected for their alignment with institutional data security expectations.
- The Data Protection Officer (DPO) is responsible for overseeing all matters related to data privacy, ensuring compliance with GDPR standards, and supporting staff in maintaining secure and accurate data practices.
- Daily behavior and skill acquisition data are recorded using the HiRasmus platform. All data entries are reviewed weekly by supervisors, with program changes made when required.
- Therapists are required to maintain updated session notes, behavioral data records, and incident reports, in accordance with Small Steps and host school documentation standards.
- Documentation audits are conducted monthly by the Program Director and/or designated QA leads to ensure alignment across all locations.
- Weekly trainings are provided on the topics of Safeguarding, Data Accuracy, and Behavioral Health.

### 4.4 Inclusion and School Collaboration

- Small Steps staff work collaboratively with host school leadership and Inclusion departments to facilitate smooth transitions to less intensive services and meaningful inclusion experiences.
- Each Inclusion Schedule is individualized, with clear documentation of supports needed in mainstream settings.
- Quality of inclusion is evaluated through school-based observations, feedback from classroom teachers, and student engagement metrics.

#### 4.5 Stakeholder Engagement and Feedback

- Parents receive daily communication through session notes, and are encouraged to attend at least 2 termly review meetings.
- Short feedback surveys are circulated to families thrice per academic year.
- Host school partners are consulted regularly through formal check-ins, Inclusion Meetings, and collaborative planning with the GEMS Link Speech and Language Therapists and Occupational Therapists.
- Feedback from parents, therapists, and school teams informs policy updates and service adjustments.

#### 5. Quality Monitoring Tools and Processes

- Termly internal audits: Comprehensive reviews of student program files, progress data, and documentation practices are conducted by the Program Director and Quality Assurance Manager across all Small Steps sites to ensure consistency, quality, and compliance.
- Monthly Learning Walks: Conducted jointly by the supervisor and the Inclusion Team, these Learning Walks are fundamental to ensuring consistent implementation of interventions across students, therapists, and lessons. A standardized fidelity checklist is utilized to guide observations and feedback.
- Supervision Reports: Prepared monthly by the supervisor in the form of a Brief Evaluation Checklist and termly as a Formal Evaluation of Performance, these reports document therapist performance, highlight areas for improvement, and set actionable goals.
- Goal Achievement Tracker: Maintained by the supervisor, this tracker is based on detailed analysis of progress on individual targets within each student's program, monitoring measurable advancement toward termly goals and identifying students who require additional support.
- Quality Assurance Task Tracker: The QA Task Tracker is a centralized management tool designed to oversee and coordinate all key activities, objectives, and performance indicators within the Small Steps program. It tracks a wide range of elements including areas of concern such as red flags or missed goals, pending documentation, as well as positive progress like training completion, parent engagement meetings, inclusion team collaborations, and program planning activities. Updated regularly by Supervisors and the Quality Assurance Manager, on a weekly or monthly basis depending on the task, the tracker ensures comprehensive visibility and accountability.

## **6. Training and Continuous Professional Development**

- All Small Steps staff are required to engage in ongoing professional development. Small Steps aims to provide up to 60 hours of training per academic year for therapists, and up to 100 hours of training for the supervisors, ensuring continuous growth and the highest standards of service delivery. Additionally, therapists and supervisors are individually required to meet the Continuing Education requirements set by their individual credentialing boards. Small Steps supports this by providing free Continuing Education Units (CEUs) toward these requirements, while acknowledging that staff will need to obtain additional CEUs independently to fulfill their full credentialing obligations.
- All training hours, including those provided by Small Steps and those completed externally, are carefully tracked by the HR Coordinator within the Staff Qualification Management (SQM) system to ensure compliance and support professional growth.
- Senior staff and Certified Behavior Analysts receive additional training in leadership, quality assurance, and safeguarding practices.
- Topics are selected based on student needs, therapist evaluations, and organizational goals (e.g., trauma-informed care, communication strategies, mainstream collaboration).

## **7. Safeguarding and Compliance**

- Small Steps fully adheres to the GEMS Education Safeguarding Policy and the UAE Federal Law No. 3 of 2016 (Wadeema's Law).
- All concerns related to safety, well-being, or misconduct are reported immediately to the Designated Safeguarding Lead, following the Incident Reporting procedures outlined in the Safeguarding and Incident Reporting Policy.
- Incident Reporting is conducted by the therapists and supervisors, using the CURA Safeguarding platform, or other incident reporting system formally authorized and approved.
- Safeguarding audits are conducted termly across all Small Steps sites to ensure compliance with internal policies, host school safeguarding standards, and relevant regulatory expectations. These audits are designed to promote a culture of vigilance, accountability, and responsiveness in all matters related to student safety and well-being. Areas reviewed as part of the safeguarding audit include documentation and implementation of informed consents, the presence and quality of individualized risk assessments, adherence to intimate care procedures, compliance with safer recruitment protocols, and the accuracy and timeliness of incident reporting. The audits also assess whether all staff have completed mandatory safeguarding training and refreshers, and whether reporting systems, such as CURA or other authorized platform, are used consistently and effectively. Findings from each audit are documented and followed up with clear action points to address any gaps in practice, with support provided by the

Quality Assurance team to ensure full implementation.

## **9. Continuous Improvement**

Small Steps is committed to a cycle of review, reflection, and refinement. This policy is formally reviewed on an annual basis by the Program Director in collaboration with the senior leadership team and Quality Assurance Manager. The review process is informed by a variety of inputs, including updates to UAE regulatory frameworks (such as those from the Community Development Authority), stakeholder feedback from parents, school partners, and staff, and key findings from internal audits and performance evaluations.

A central component of Small Steps' continuous improvement framework is the use of a Quality Assurance Dashboard and Trends Tracking System. These tools are updated regularly and used to systematically monitor program performance, identify patterns in student progress, fidelity of implementation, training outcomes, supervision consistency, and safeguarding compliance. Emerging trends, whether strengths to be replicated or gaps to be addressed, are flagged for leadership review and translated into action steps with defined accountability timelines. Through this structured approach, Small Steps ensures that quality assurance is not only a compliance activity but a meaningful driver of improved service delivery and student outcomes.

## **10. Impact Assessment**

To evaluate the long-term effectiveness of the Quality Assurance framework and its contribution to student outcomes, staff development, and service excellence, Small Steps implements a structured Impact Assessment process. This process measures not only procedural compliance but also the tangible impact of policies and interventions across multiple dimensions of service delivery. Impact is assessed through both termly and annual reviews, using qualitative and quantitative indicators. These include:

- Student Outcome Trends: Monitoring progress toward skill acquisition goals, behavioral reduction, and inclusion rates using data logged on HiRasmus.
- Stakeholder Satisfaction: Aggregated feedback from parents, partner schools, and therapists collected through surveys and clinical meeting feedback forms.
- Staff Competency Growth: Measured through supervision evaluations, training participation logs, and fidelity checks.
- Operational Efficiency: Analysis of documentation accuracy, incident reporting timelines, and compliance with training and safeguarding requirements.

Each term, data from these indicators is compiled into a central quality assurance dashboard, allowing the leadership team to identify patterns, evaluate progress, and prioritize areas for intervention or enhancement. At the end of each academic year, the Program Director and

Quality Assurance Manager conduct a formal Annual Impact Review, compiling key performance indicators (KPIs), outcomes data, and improvement milestones into a comprehensive year-end summary. The findings from these assessments are used to refine strategic priorities for the upcoming academic year, inform training needs, and update procedural policies. This ensures the Quality Assurance framework remains responsive, outcome-driven, and aligned with UAE regulatory expectations and international best practices.

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