



INTERNAL QUALITY ASSURANCE POLICY

2026 – 2027

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Prepared By	Veronica Micalizio
Approved By	Inderjot Singh
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1. Policy Statement

Small Steps Learning Difficulties Centre LLC (“Small Steps”) operates as a social care service provider licensed by the Community Development Authority (CDA), Dubai. Small Steps delivers its services only within the activities, professional categories, conditions, and scope of service authorised under its current CDA licence and applicable CDA requirements. Within this authorised scope, Small Steps is committed to delivering consistent, high-quality, and child-centred services in Applied Behaviour Analysis (ABA), therapeutic support, and educational inclusion across its partner school settings.

Our Internal Quality Assurance framework is rooted in evidence-based practice and guided by internationally recognised clinical, educational, safeguarding, and regulatory standards. It is designed to promote fidelity to intervention, equity in service delivery, data-informed decision-making, and best-practice implementation, ensuring that every child receives individualised and effective support tailored to their needs. In alignment with our commitment to continuous improvement and accountability, Small Steps’ policies and procedures support compliance with CDA requirements and, where services are delivered within school settings, take account of relevant KHDA expectations for inclusive education, safeguarding, and educational quality. This integrated approach ensures that quality is upheld not only in therapeutic and instructional practice, but also across collaborative, operational, and protective dimensions of the 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 KHDA 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. Internal Quality Assurance Framework

The QA framework is structured around core components that guide the consistency, effectiveness, compliance, safeguarding, stakeholder engagement, and accountability of service delivery across all sites. These components are integrated to uphold evidence-based practice, child-centred programming, regulatory compliance, data-informed decision-making, and continuous improvement across clinical, educational, operational, and safeguarding systems.

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.
- Student progress is monitored through termly review of mastered goals, skill acquisition data, behaviour data, inclusion participation, and progress against individualised intervention targets.
- Where benchmarks are used to support quality review, they are applied as monitoring indicators to guide planning, supervision, and intervention adjustments, rather than as standalone measures of student success.

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.

- Supervisor oversight includes structured review of therapist performance, training needs, documentation quality, clinical implementation, parent communication, and follow-through on agreed actions.
- Supervisors are also reviewed through a leadership oversight framework covering team development, clinical quality, documentation and reporting, communication, professionalism, and contribution to cross-site accountability.

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.
- Compliance documentation is reviewed across required categories, including student identification records, consent forms, Personal Emergency Evacuation Plans, Shelter in Place documentation, Individual Care Plans, Risk Assessments, and other documentation required by Small Steps, host schools, GEMS Education, or regulatory authorities.
- Attendance is monitored across sites to identify patterns that may affect access to intervention, mainstream inclusion, student progress, safeguarding follow-up, and continuity of service delivery.
- 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.
- Inclusion data is reviewed alongside attendance, mastered goals, classroom observations, school feedback, and student readiness indicators to support meaningful, sustainable participation in mainstream settings.
- Learning Walks and collaboration with Inclusion Teams are used to review therapist engagement, student regulation, inclusion fidelity, and practical classroom implementation.

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.
- Parent concerns raised through parent meetings, inclusion meetings, clinic meetings, or other formal communication channels are logged, monitored, and followed through to resolution using clear ownership, timelines, and review expectations.
- Stakeholder feedback, including parent satisfaction surveys and school inclusion department feedback, is reviewed as part of the quality assurance cycle and used to inform service development, communication priorities, and partnership working.

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 Internal 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.
- Internal 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 Internal Quality Assurance Manager, on a weekly or monthly basis depending on the task, the tracker ensures comprehensive visibility and accountability.
- Clinic Meeting Tracker: Clinic meetings are monitored to ensure proactive scheduling, clear parent priorities, documented actions, identified owners, and timely follow-up before the end of each review cycle.
- Clinical Leadership Meetings: Weekly meetings with supervisors are used to review student progress, documentation updates, clinic meeting pacing, safeguarding matters, staffing considerations, training priorities, action logs, and cross-site consistency.

- Lateral Checks: Cross-site checks are used to review documentation integrity, programming and data systems, Functional Behaviour Assessment, and Behaviour Support Plan documentation, safeguarding updates, therapist risk factors, and consistency of collaboration with Inclusion Teams.
- Interobserver Agreement Checks: IOA checks are implemented as a quality assurance measure to review the reliability and consistency of behavioural data collection and to strengthen confidence in data-informed clinical decisions.
- Satisfaction and Concern Tracking: Parent concerns, parent feedback, and school inclusion department feedback are reviewed to identify communication trends, service strengths, and areas requiring improvement or follow-up.

6. Training and Continuous Professional Development

- All Small Steps staff are required to engage in ongoing professional development. The therapist training and professional development target is 40–45 hours of structured training and professional development per therapist per academic year, with a minimum expectation of 35 hours. Supervisors will complete a target of 100 hours of professional development per academic year, comprising approximately 70 hours of organisation-led or protected-time development and up to 30 hours of self-directed, company-supported professional learning. Development should address clinical practice, supervision, leadership, ethics, evidence-based practice, and individualised professional-growth priorities.
- Therapists and supervisors are also individually required to meet the Continuing Education requirements set by their respective credentialing boards. Small Steps supports this by providing access to Continuing Education Units where available, while acknowledging that staff may need to obtain additional CEUs independently to fulfil their full credentialing obligations.
- All training hours, including those provided by Small Steps and those completed externally, are 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, internal quality assurance, and safeguarding practices.
- Topics are selected based on student needs, therapist evaluations, and organizational goals (e.g., trauma-informed care, communication strategies, and 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 concerns are reviewed by severity level in line with the organisation's safeguarding framework, and each concern must have an appropriate action plan, escalation pathway, and follow-up process documented.

- Safeguarding documentation reviewed through the quality assurance cycle includes, but is not limited to, Risk Assessments, Intimate Care Plans, therapist risk assessments where required, informed consents, incident records, escalation notes, and evidence of action planning.
- 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 Internal Quality Assurance team to ensure full implementation.

8. Continuous Improvement

Small Steps is committed to a cycle of review, reflection, and refinement. This policy is formally reviewed at least annually by the Programme Director, in collaboration with the senior leadership team and Internal Quality Assurance Manager. The review process is informed by updates to UAE regulatory frameworks, including Community Development Authority requirements, stakeholder feedback from parents, school partners, and staff, quality assurance dashboards, safeguarding trends, parent concern tracking, training and evaluation data, inclusion outcomes, attendance patterns, clinical documentation reviews, and findings from internal audits and performance evaluations.

A central component of Small Steps' continuous improvement framework is the use of quality assurance dashboards, trackers, meeting records, audit findings, and trend analysis systems. These tools are updated regularly and used to monitor programme performance, compliance readiness, attendance, inclusion, student progress, therapist training, supervision consistency, safeguarding activity, parent concerns, stakeholder satisfaction, and documentation quality. Emerging trends, whether strengths to be shared or gaps to be addressed, are flagged for leadership review and translated into action steps with clear accountability and follow-up 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, student outcomes, safeguarding practice, and stakeholder confidence.

9. Internal Quality Assurance Report

To evaluate the effectiveness of the Internal Quality Assurance framework and its contribution to student outcomes, staff development, safeguarding, stakeholder engagement, and service improvement, Small Steps uses a structured Internal Quality Assurance Report process. This process reviews not only procedural compliance but also how quality assurance systems are being implemented across key areas of service delivery. Evidence is reviewed at half-term and at the end of term using both 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.
- Safeguarding and Risk Management: Review of safeguarding concerns, severity levels, escalation pathways, action planning, documentation compliance, and system-level follow-up.
- Parent and School Partnership: Review of parent concerns, clinic meeting follow-up, school inclusion department feedback, parent satisfaction data, and communication trends.

Each term, data from these indicators is compiled into a central quality assurance dashboard, allowing the leadership team to identify patterns, evaluate progress, and prioritise areas for intervention or enhancement. The Internal Quality Assurance Report is completed at half-term and at the end of term by the Programme Director and Internal Quality Assurance Manager, drawing together key performance indicators (KPIs), outcomes data, compliance findings, safeguarding trends, stakeholder feedback, and improvement milestones into a structured review. The findings from these reports are used to refine strategic priorities, inform training needs, strengthen follow-up actions, and update procedural policies. This ensures the Internal Quality Assurance framework remains responsive, outcome-driven, and aligned with UAE regulatory expectations and international best practice.

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