

SAFER RECRUITMENT POLICY

2026 – 2027

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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 service scope authorised under its current CDA licence and applicable CDA requirements. Safeguarding the welfare of our students is paramount. We are committed to applying robust safer recruitment practices to provide a secure, supportive, and inclusive environment. This policy sets out the principles and procedures that apply when recruiting employees, interns, contractors, and other individuals engaged by Small Steps, in accordance with applicable UAE law, CDA requirements, relevant school and GEMS requirements, and recognised safeguarding practice.

2. Scope

This policy applies to all individuals involved in recruitment and selection at Small Steps, including senior leaders, Certified Behaviour Analysts, certified or non-certified therapists, HR personnel, and external recruitment partners. It encompasses the hiring of all employees, interns, and contractors.

3. Core Principles

Our recruitment approach reflects Small Steps’ core values of evidence-based interventions, compassionate care, and quality services. We seek to appoint individuals who demonstrate commitment to these values and have a strong understanding of safeguarding responsibilities within the context of ABA and school inclusion.

4. Legal and Regulatory Alignment

Small Steps’ recruitment practices comply fully with relevant UAE legislation, including Federal Law No. 3 of 2016 (Wadeema’s Law), as well as international safeguarding standards. We ensure that all processes meet or exceed requirements set forth by local authorities and reflect best practice globally.

5. Recruitment Aims

The goal of our safer recruitment process is to ensure that individuals who are hired to work with vulnerable populations, such as children or adults at risk, are thoroughly vetted and assessed for their suitability. These practices are designed to prevent individuals who may pose a risk from gaining access to these groups. Through this process we aim to attract and appoint the most suitable candidates who uphold the highest ethical and professional standards.

6. Roles and Responsibilities

All recruitment panels at Small Steps include at least one member who has completed the NSPCC-accredited Safer Recruitment in Education and Skills training, with refresher training required every two years. This applies to all senior leaders involved in the selection process, ensuring that safeguarding considerations are central at every stage.

The Human Resources Manager is responsible for coordinating recruitment checks, maintaining accurate records, and confirming that all required documentation has been received before a candidate starts work. The line manager is responsible for assessing role-specific competence and suitability. The Designated Safeguarding Lead provides advice where safeguarding concerns, disclosures, or discrepancies arise. No

individual may begin regulated or unsupervised work with students until all mandatory checks have been completed and formally approved.

7. Advertising and Recruitment Materials

All job advertisements and internship postings clearly state Small Steps' commitment to safeguarding. The following statement is included in every advert: "Small Steps is committed to safeguarding and promoting the welfare of children and expects all staff, interns, and volunteers to share this commitment."

8. Application and Shortlisting

The Human Resources team reviews applications submitted through platforms such as LinkedIn, the Small Steps careers page, and other recruitment websites. Candidates are shortlisted based on meeting the essential criteria, typically including 2 to 3 years of ABA experience, possession of valid RBT/IBT/ABAT certifications, attested academic degrees, and other relevant qualifications. Shortlisted candidates must complete a Small Steps Employment Application Form, which gathers detailed information about visa status, salary expectations, employment history, and references.

During interviews, candidates are asked to explain any gaps or inconsistencies in their employment history. Candidates who present unresolved safeguarding risks or red flags will not be considered for appointment, regardless of qualifications.

9. References

Two professional references are required for each candidate, with at least one from the most recent employer or educational supervisor. These references provide insights into the candidate's past performance, conduct, disciplinary history, and suitability for working with children and vulnerable populations. HR staff verify references directly through phone or email and document any discrepancies or concerns for further assessment.

10. Pre-Employment Vetting

Candidates who progress to the final stages of recruitment must complete a comprehensive employment application form and disclose any information relevant to their suitability to work with children or adults at risk, where disclosure is lawful and required.

As part of the safer recruitment process, candidates must provide:

- Proof of identity;
- Attested academic and professional qualifications;
- A recent Dubai Police Clearance Certificate, also referred to as a Police Clearance Certificate or Good Conduct Certificate;
- Police clearance certificates from other countries in which the candidate has resided or worked during the previous three years, where these can lawfully and reasonably be obtained;
- A good conduct certificate from the candidate's country of origin, where required and available;
- An Occupational Health Certificate confirming fitness for the duties of the role; and
- Any other documentation required by UAE law, the Community Development Authority, the Knowledge and Human Development Authority, GEMS Education, or the requirements of the relevant school site.

The International Child Protection Certificate may be requested as a supplementary reference check where it is relevant to the candidate's residence history, the role, and the checks legally available. It is not treated as a general requirement under UAE law or as a stated requirement of the Community Development Authority, the Knowledge and Human Development Authority, or GEMS Education.

Child-protection, barred-list, or prohibited-list checks from another jurisdiction may also be requested as supplementary reference checks where they are legally available and relevant to the candidate's residence or employment history. These checks do not replace the Dubai Police Clearance Certificate or any other vetting required under UAE law, regulatory requirements, GEMS Education procedures, or school-site requirements.

Further vetting may be required after appointment if new information emerges, the individual's role or visa status changes, or safeguarding requirements are updated. Small Steps may request updated documentation and reassess continued suitability on safeguarding or compliance grounds.

11. The Selection Process

Initial interviews, conducted by the HR Manager, explore candidates' qualifications, safeguarding awareness, and any anomalies in their application. Candidates who pass this pre-screening process are then interviewed by a member of senior staff, such as a Certified Behaviour Analyst or Program Director. Only those who successfully pass this interview are invited to participate in a practical demonstration session working directly with a Small Steps learner. This supervised session assesses the candidate's ability to apply ABA methods compassionately and competently. The interview process incorporates safeguarding questions and scenarios to evaluate candidates' understanding and commitment. All job offers are conditional, pending satisfactory completion of all vetting, reference checks, and credential verification.

12. Contractors and External Vendors

Any contractors and third-party vendors engaged by Small Steps must comply with our safer recruitment standards. As part of the supplier onboarding process, this includes verifying identity, providing a valid certificate of good conduct, and submitting proof of professional qualifications where applicable. Small Steps maintains a Preferred Supplier List (PSL), a vetted group of approved recruitment agencies and service providers who meet our safeguarding, compliance, and background-check standards. Only suppliers on the PSL are permitted to provide services that involve student contact or access to school premises.

13. Induction and Ongoing Professional Development

New hires and interns at Small Steps receive comprehensive safeguarding training as part of their induction, which is provided by RedRock Frontline Training and recorded in the SQM by the HR Coordinator. To maintain high standards, all personnel undertake mandatory annual refresher training. Senior staff and Certified Behaviour Analysts complete accredited Safer Recruitment Training and are tasked with mentoring staff and interns on safeguarding principles.

14. Single Central Record

Small Steps maintains a Single Central Record (SCR) that logs all recruitment checks for employees, interns, and contractors. This includes dates and outcomes of background verifications, reference checks, qualifications validation, and safeguarding training completion.

15. Continuous Improvement

To uphold the highest safeguarding standards, Small Steps reviews this policy annually or sooner if needed. Updates should reflect changes in UAE legislation and evolving international best practices. Input from staff feedback, audit results, and advancements in child protection research informs ongoing enhancements to our recruitment process. To ensure ongoing compliance with safeguarding standards and continuous improvement across all campuses, Small Steps undergoes an annual external safeguarding audit conducted by an independent, qualified safeguarding professional. This audit evaluates the centre's adherence to child protection protocols, safer recruitment practices, staff training, and documentation procedures. As part of the audit, recruitment records are sampled and reviewed to ensure all pre-employment checks, vetting procedures, and recruitment panel requirements are consistently followed across all Small Steps sites housed within GEMS schools. This policy should be read in conjunction with the HR Policy, Staff Handbook, Safeguarding and Child Protection Policy, and the Whistleblowing Policy.

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