



HR POLICY

2026 – 2027

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Purpose And Commitment

Small Steps provides specialised support to children with learning difficulties and their families. This policy sets the employment standards, rights and responsibilities that support safe service delivery, fair treatment and accountable management. Our vision is to see every child facilitated and integrated into a mainstream school. We require collaboration, professional integrity, safeguarding and continuous improvement in every workplace.

1 Application and Legal Effect

This policy applies to employees engaged by the Company under the employment contracts, across centre, school, home based and authorised remote assignments. Part time, temporary, flexible and other approved work patterns receive the entitlements applicable to their pattern. Contractors and volunteers must follow safeguarding, confidentiality and safety requirements but do not acquire employee status solely through this policy.

The governing framework is Federal Decree Law No. 33 of 2021 regulating labour relations, as amended, Cabinet Resolution No. 1 of 2022, and applicable MOHRE resolutions, including the current Wage Protection System requirements. Other applicable UAE and Dubai licensing, health, child protection, immigration, pension and data protection requirements must also be followed.

1.1 Priority of Law and Contractual Rights

Mandatory law prevails over this policy and any contrary instruction. More favourable lawful rights in an employee's contract or an established binding benefit remain protected. Any unlawful clause is ineffective to the extent of the conflict; the remaining lawful provisions continue. No employee acknowledgement waives a statutory entitlement or the right to contact authorities.

Once approved, communicated and lawfully incorporated into employment arrangements, the operational obligations in this policy form the Company's internal work rules. Any change to salary, contractual benefits, working arrangements or other contractual terms requires the agreement and formalities required by law; a policy update alone cannot impose that change.

1.2 Responsibilities and Definitions

The COO approves the policy and material employment decisions. HR administers contracts, leave, records and fair procedures. Finance administers payroll and final settlements. Managers roster lawful hours, arrange child supervision and document performance. Employees must follow lawful instructions, record attendance accurately and raise safety or employment concerns promptly.

Basic wage means the basic amount recorded in the employment contract, excluding allowances. Full wage includes the basic wage and contractual allowances as applicable. Calendar days include weekends; working days refer to the employee's scheduled workdays. Each entitlement shall use the calculation basis required by law.

1.3 Interpretation and Accessibility

HR shall explain this policy in a language the employee understands and provide access to current work instructions.

2 Recruitment Contracts and Probation

2.1 Equal, Safer Recruitment and Multicultural Inclusion

Small Steps is committed to recruiting suitable, competent employees through a consistent, fair and culturally inclusive process that prioritises children's safety and wellbeing. Recruitment shall include identity verification, qualification and professional licence checks where applicable, employment history review, satisfactory references and relevant background or police clearance checks in accordance with applicable requirements. Interviews shall assess safeguarding awareness, professional boundaries and suitability to work with children and people of determination. Any discrepancies or concerns must be resolved before deployment.

Small Steps values its multicultural workforce and shall treat candidates fairly, regardless of cultural background, nationality, ethnicity, religion or gender, subject to lawful Emiratisation requirements. Employees must demonstrate respect for different cultures, languages and abilities. Cultural differences shall never justify unsafe conduct or compromise safeguarding standards. All new employees shall complete safeguarding and inclusion induction, with ongoing supervision during probation.

Recruitment shall be based on role requirements, competence and lawful eligibility. Discrimination on legally prohibited grounds, including race, colour, sex, religion, national or social origin and disability, is prohibited. Equal pay for equal work or work of equal value shall be respected, alongside lawful Emiratisation requirements.

HR shall obtain an application with employment history, explain gaps, verify identity and qualifications, check professional registration and seek professional references. Criminal record and overseas checks shall be proportionate, lawful and relevant to work with children. Structured interviews shall include safeguarding scenarios. Practical assessments must not become unauthorised productive work or unsupervised access to children.

Offers are conditional on satisfactory checks, permits and required licences. HR shall maintain a safer recruitment record and escalate unresolved concerns before deployment. Staff working with children must complete safeguarding induction before independent duties.

2.2 Employment Contract

HR shall issue a clear offer and contract identifying the employer, role, work pattern, workplace, start date, basic wage, allowances, hours, leave and notice period. Employment shall use the contract form and duration permitted by current law. Employees receive a copy.

2.3 Probation

Probation must be agreed in the contract, cannot exceed six months and cannot be repeated with the same employer. Continued service counts from the original joining date. Managers shall document induction, supervision and suitability reviews before probation ends.

An employer ending employment during probation must give at least 14 days' written notice. An employee moving to another UAE employer must give at least one month's written notice; an employee leaving the UAE must give at least 14 days. HR shall apply Article 9 to compensation for insufficient notice and any lawful recovery between employers, including a return to UAE employment within three months. Recruitment costs must not simply be billed to the employee.

3 Working Hours Attendance and Deployment

3.1 Rosters

Managers shall issue a written roster showing start and end times, breaks, weekly rest and site assignment. Children's programme hours do not automatically define employees' shifts. Required preparation, meetings, training, handovers and attendance before children arrive are work time and must be included in the roster and lawful hours assessment.

Normal hours shall not exceed eight per day or 48 per week unless a specific lawful arrangement or exception applies. Breaks are normally excluded from working hours. Managers must provide relief cover so staff supervising children can take breaks. At least one paid weekly rest day is required. Employees are entitled to paid UAE public holidays officially declared for the private sector.

During Ramadan, normal daily working hours shall be reduced by two hours under applicable private sector rules without reducing contractual wages. HR shall issue the Ramadan roster. A job title alone does not establish an overtime exemption; any exemption must be checked against the law.

3.2 Overtime and Holiday Work

Managers must authorise and record overtime. Lack of advance approval does not remove payment rights for work the Company required or knowingly accepted. Overtime is normally limited to two hours per day, subject to lawful emergency exceptions; the statutory total of 144 working hours over three weeks must be respected.

Eligible ordinary overtime shall be paid on the basic hourly wage plus at least 25 percent. Eligible overtime between 10 pm and 4 am attracts at least 50 percent additional basic pay, with the statutory shift worker exception. For work on a designated rest day, provide a substitute rest day or the statutory basic pay plus at least 50 percent. For public holiday work, provide a substitute day or normal day pay plus at least 50 percent of basic day pay. HR shall apply Articles 19 and 28 and record the arrangement.

3.3 Attendance and Movement

Employees must record their own attendance, arrive ready at the rostered start and inform their manager promptly of delay or absence. Leaving during a shift requires permission except where immediate safety or medical needs prevent it.

Site changes must remain within lawful employment, licensing and safety arrangements. Required travel between sites during duty shall be recorded as work time where applicable. Approved intersite local travel may be reimbursed up to AED 25 per day against evidence; any necessary additional cost requires advance approval where practicable. An employee must never leave a child without an authorised handover.

4 Pay Benefits and Deductions

4.1 Payroll and wage protection

The Company shall pay the full wages lawfully due through WPS or another MOHRE approved system. Under Ministerial Resolution No. 340 of 2026, the previous month's wages are due on the first day of each Gregorian month. The Company's operational target is the last working day of the earning month, preserving any earlier contractual payday. Finance must allow for bank processing, weekends and holidays to avoid late payment.

Each employee shall receive a payroll statement showing basic wage, allowances, approved overtime, leave adjustments, deductions and net payment. Finance shall reconcile the MOHRE contract, attendance, leave and transfer records before submission. Payroll disputes must be acknowledged within three working days and verified errors corrected promptly.

A WPS compliance threshold is an enforcement measure, not permission to withhold part of an employee's entitlement. The Company must pay all sums lawfully due and retain evidence for any exclusion or adjustment. HR and Finance shall verify current WPS requirements before each payroll cycle and investigate rejected or incomplete transfers immediately.

4.2 Lawful Deductions

No manager may impose an arbitrary fine, make an undocumented deduction or withhold salary because a parent has not paid or an employee has resigned. Every deduction requires a specific lawful basis, evidence, the applicable consent or order, and compliance with Article 25 limits and current WPS rules. General consent in this policy is not authorisation for a future deduction.

Loan or advance recoveries, overpayments, court orders and proven damage must each be assessed separately against the relevant legal conditions and limits. Total deductions cannot exceed the applicable statutory cap, and HR must also check any stricter WPS payment requirements. Disputed damage shall not be recovered by automatic payroll deduction. Unpaid absence adjustments must reflect verified time not worked and must not become a disciplinary fine.

5 Annual Leave and Sickness

5.1 Annual Leave

Full time employees receive at least 30 calendar days of paid annual leave for each completed year. For service exceeding six months but less than one year, entitlement is two days per month. HR shall calculate proportional entitlement for the final part year and apply the statutory formula for part time employees. Annual leave pay uses full wage; payment for unused leave at termination uses basic wage unless a more favourable lawful term applies.

Small Steps staff

Public holidays and rest days falling within annual leave are counted as part of it unless a more favourable term applies. Carryover may be agreed within the Executive Regulations, including up to half the annual entitlement to the following year, or lawful cash settlement by agreement.

5.2 Sick leave

Paid sick leave becomes available after probation ends, even where the agreed probation was shorter than six months. Up to 90 continuous or intermittent days per year are available: the first 15 at full wage, the next 30 at half wage and the remaining 45 unpaid. During probation the Company may approve unpaid sick leave supported by a medical report.

Employees must notify the manager as soon as reasonably possible and within next working day submit a report from a recognised licensed medical entity. HR shall confirm any certification or attestation required by the competent health authority. A DHA only rule shall not invalidate an otherwise legally acceptable certificate. Medical records shall be handled confidentially. All the sick leaves should be applied and recorded on Breathe HR.

Paid leave exclusions for employee misconduct apply only where the statutory conditions and evidence support them. Work related injury is handled separately. No employee shall be dismissed for medical unfitness before statutory leave is exhausted. Any termination after exhaustion requires a lawful assessment and payment of all entitlements.

6 Family and Other Leave

6.1 Maternity & Paternity Protection

Female employees receive 60 calendar days of maternity leave: 45 at full wage and 15 at half wage. HR shall administer the entitlement under Article 30, including qualifying birth after six months of pregnancy where the child is stillborn or subsequently dies. Maternity leave is not subject to a one year service requirement.

A medically certified illness of the mother or child arising from pregnancy or childbirth may support up to 45 additional unpaid days, continuous or intermittent. Where a sick child or child of determination requires continuous accompaniment under a medical report, the employee receives 30 additional paid days after maternity leave, extendable by 30 unpaid days. HR shall verify the applicable medical evidence without unnecessarily requesting detailed diagnoses.

On return, one or two daily breastfeeding breaks totalling no more than one hour are available for up to six months from delivery. Pregnancy, maternity leave and lawful related absence must not be grounds for dismissal or an adverse employment decision. Requests for a safe temporary work adjustment shall be assessed promptly.

In accordance with UAE Labour Law, an employee (father) is entitled to five (5) working days of paid parental leave following the birth of a child. The leave may be taken continuously or intermittently within six (6) months from the date of birth. Employees must notify HR and provide appropriate proof of the child's birth when requesting the leave.

6.2 Unpaid and Emergency Leave

Other unpaid leave requires written approval. HR shall explain the lawful impact on service calculations and benefits before approval. Emergency requests shall receive prompt consideration. Statutory leave shall not be refused simply because it was not requested through the normal system.

7 Conduct Safeguarding and Professional Practice

7.1 Professional Behaviour

Employees shall treat children, families, colleagues and partners with dignity; maintain honest records; follow lawful instructions; and work within their competence. Harassment, bullying, sexual harassment, violence, humiliation, discrimination and retaliation are prohibited. Employees may report directly to HR or the CEO if the manager is involved. Reports shall be investigated impartially and confidentially as far as practicable.

Clothing must be clean, modest, professional and suitable for safe movement and intervention. Unsafe footwear, torn or transparent clothing and beachwear are unsuitable. Religious and cultural dress is respected subject to objectively justified safety requirements. Staff must wear required identification and maintain professional boundaries with families.

7.2 Child safeguarding

Every employee shall follow the SSBD Safeguarding Policy and site safeguarding arrangements. Any suspected abuse, neglect, unsafe practice or concern about an adult must be reported immediately to the designated safeguarding lead or deputy. If that person is implicated or unavailable, escalate to the CEO or an alternative authorised safeguarding contact. Internal reporting must never delay urgent protection or reporting to competent authorities.

In immediate danger, staff must protect the child within their competence and contact emergency services. Staff shall make a factual record, preserve evidence and avoid conducting their own child protection investigation. Confidentiality cannot be promised where a safeguarding report must be shared. HR and safeguarding investigations shall be coordinated without compromising statutory reporting.

Corporal punishment, degrading treatment, unauthorised restraint and improper isolation are prohibited. Physical intervention may occur only within law, approved plans and policy, by appropriately trained staff, and where necessary and proportionate for immediate safety. All such incidents require prompt recording, reporting and review. Children must never be left unsupervised or handed to an unauthorised person.

7.3 Credentials and Conflicts

Staff shall maintain required professional credentials, registration and supervision and notify HR immediately of expiry, restrictions, criminal proceedings relevant to suitability or other material safeguarding changes. The Company shall review suitability fairly and prevent duties that require an authorisation the employee no longer holds.

Employees must disclose outside work, private therapy, financial interests, gifts and relationships that could affect impartiality or child care. Outside work requires the lawful permits and any approval legitimately required under the contract. Staff may not divert Company clients, accept secret commissions or use Company data for personal gain. A noncompete restriction requires a separate lawful, proportionate contractual clause; this policy creates no blanket post-employment ban.

8 Technology Confidentiality and Safety

8.1 Confidential Information

Employees shall access child, family and employee records only for authorised duties. Information shall be accurate, shared only with approved recipients and stored in Company approved systems. Staff must verify identity and authority before releasing records. Disclosure required by law, safeguarding duties or a competent authority remains permitted.

Do not send records to personal email, unapproved cloud accounts, personal messaging groups or public AI tools. Do not photograph, record or publish children or families without the lawful permissions and Company approval. Parent consent alone does not authorise an employee to publish material on a personal account. Confidentiality continues after employment ends.

8.2 Devices HR Records and Social Media

Use individual accounts, strong passwords and multifactor authentication where available; lock unattended devices and report suspicious messages, lost equipment, misdirected emails or unauthorised access immediately. Do not share passwords or install unauthorised applications. Monitoring must be lawful, proportionate and explained; this policy does not authorise unrestricted access to personal devices.

Personal phone use is prohibited during direct child supervision and other assigned duties where it interferes with work or safety. Phones may be used during designated breaks. Essential approved work use, accessibility needs and emergencies are exceptions. Emergency use requires a safe handover and notification as soon as practicable. Managers must not seize private phones or demand personal passwords.

HR shall maintain secure personnel records, including contracts, permits, leave, payroll, competency and review records. An approved system such as Breathe HR may be used with role based access. HR shall define lawful retention periods, including the labour law minimum of two years after employment ends, and retain records longer where another law, safeguarding requirement or legal hold applies. Sensitive health records shall have restricted access. Staff may request correction of inaccurate data.

8.3 Health Safety and Work Injury

The Company shall provide safe facilities, risk assessments, emergency arrangements, suitable equipment and role specific training. Employees shall follow infection prevention, manual handling, lone working, transport and home visit controls. Staff shall report hazards, accidents and near misses immediately and may raise serious danger without retaliation.

Work injuries and suspected occupational disease must be escalated to HR immediately. The Company shall arrange treatment and make required reports, including notification to MOHRE within 48 hours where required by applicable rules.

9 Development and Fair Discipline

9.1 Performance and Progression

Managers shall conduct documented monthly one to one reviews covering workload, quality, safeguarding, agreed goals and support. HR shall coordinate a training needs assessment and record induction, supervision, mandatory training and professional development. Required training time must be included in working time calculations. Normal induction and mandatory compliance training costs shall not be charged back as an exit penalty.

Where performance falls short, a performance improvement plan shall identify the issue, measurable expectations, reasonable review dates and support. Medical needs and disability adjustments shall be considered. Promotions and rewards shall follow documented competence, performance, vacancy and budget criteria. No automatic bonus or promotion is promised unless contractually provided; contractual benefits cannot be removed by informal instruction.

9.2 Disciplinary Procedure

HR shall assess alleged misconduct promptly and proportionately. Give written notice of the allegation, allow a meaningful response, investigate impartially and record the employee's explanation and evidence. An allegation must not be brought more than 30 days after discovery, and a sanction must not be imposed more than 60 days after the investigation concludes and the violation is established, as required by the Executive Regulations.

Communicate the reasoned decision in writing, including the conduct established, sanction, effective date and appeal route. No more than one disciplinary sanction may be imposed for the same violation. Conduct outside work is disciplinable only where related to work. A payroll correction for time not worked must not conceal an additional penalty.

The Company's adopted sanctions are written notice, written warning, a final written warning as a form of written warning, and lawful termination with preservation of statutory benefits. Coaching may precede formal discipline. Severity, repetition, intent, harm and mitigation determine the response; progressive warnings are not mandatory for every case. This policy does not adopt wage fines or unpaid disciplinary suspension. Other statutory sanctions require a separately approved lawful schedule before use.

9.3 Suspension and Appeal

Where necessary to protect children or evidence, an authorised manager may temporarily remove an employee from child contact or place them on full paid administrative leave. This is a neutral precaution, not proof of guilt. Any suspension under Article 40 must satisfy its separate conditions, duration and wage restoration requirements; managers cannot use open ended unpaid suspension.

An employee may appeal in writing within ten working days. An uninvolved senior decision maker shall review fairness and evidence, normally within ten further working days, and give a written outcome. Extensions require reasons and updates.

10 Grievances and Employment Termination

10.1 Grievances and Protected Reporting

Employees may raise a concern directly with HR, their manager or the CEO. Informal discussion is optional and unnecessary for harassment, safeguarding or serious allegations. A formal grievance should state the concern, relevant dates, evidence and requested remedy. HR shall assist employees who need help recording it.

HR shall acknowledge within three working days, arrange an impartial investigation, hear relevant parties and aim to give a written outcome within 15 working days. If more time is needed, explain why and provide an expected date. An appeal may be submitted within ten working days and reviewed by an uninvolved senior authority. Information shall be shared only as necessary. Good faith reporting is protected even if the allegation is not substantiated.

Employees may approach MOHRE at any stage without exhausting internal procedures. The Company shall cooperate with lawful complaints and decisions and shall not retaliate. HR shall apply the current Article 54 dispute process and statutory deadlines; internal time limits do not extend them. Employment termination because of a proven valid serious MOHRE complaint or lawsuit is unlawful under Article 47.

10.2 Ordinary Termination and Resignation

Either party may end employment for a legitimate reason with written notice under the contract and law. After probation, the agreed notice period must be between 30 and 90 days. The same period applies to both parties unless a difference favours the employee. Work and full wages continue during notice unless a lawful arrangement preserves the relevant rights. Notice compensation uses the last full wage for the unserved period.

Resignation shall be acknowledged promptly and shall not be blocked pending approval. Managers shall arrange child continuity and handover within lawful notice. Employer initiated termination must state the lawful reason, effective date and notice arrangements. An employee dismissed with notice may take one unpaid working day per week to seek work, with at least three days' advance notification.

10.3 Dismissal Without Notice and Statutory Protections

Dismissal without notice is permitted only where an Article 44 ground and all its conditions are established through a written investigation and a reasoned written decision delivered to the employee. Examples include not performing assigned duties resulting in gross loss, proven forgery, specified serious safety breaches, qualifying unauthorised absence exceeding 20 intermittent or seven consecutive days in a year, and continued failure of basic contractual duties after the required investigation and two dismissal warnings. Ordinarily poor performance, one phone breach or a label of gross misconduct is not by itself an Article 44 ground.

Employees retain Article 45 rights to leave without notice when its conditions apply. HR must check protected leave, medical and maternity rights before dismissal and must never file a false absence report or threaten an automatic employment ban.

11 Final Settlement and Implementation

11.1 Final Payments

The Company shall pay final wages and all other sums due by the 10th calendar day of the month. Finance shall issue an itemised calculation covering wages, approved overtime, notice compensation where applicable, unused leave, end of service benefits and lawful deductions. Clearance, a dispute over equipment or a delayed replacement employee shall not postpone the statutory deadline.

For eligible foreign full time employees completing at least one year of continuous service, gratuity is calculated on the last basic wage: 21 days per year for the first five years and 30 days per year thereafter. Part years are proportional once eligibility is met; unpaid absence is excluded as required by law. The total statutory cap is two years' wage. Resignation or lawful dismissal does not automatically forfeit gratuity. Pension covered nationals and employees in an approved alternative savings scheme follow their applicable system; part time employees receive the statutory proportion.

HR shall verify any legally required repatriation expenses, including applicable exceptions when the employee joins another employer or termination is attributable to the employee. Ordinary annual flights are distinct contractual benefits. HR shall provide a service certificate on request without prejudicial wording, return documents and process permit and visa cancellation lawfully. No employee shall be asked to acknowledge receipt of money before receiving it.

11.2 Exit Controls

Employees must hand over records, return Company property and preserve confidentiality. Managers shall arrange service continuity and disable access at the appropriate time. Any claimed loss requires evidence and a separate lawful recovery process. An exit interview is voluntary and does not condition statutory payment.

12 Disciplinary Guidance and Legal References

12.1 Guidance For Consistent Decisions

Minor first occurrence: verified lateness, a non safety related dress breach or inappropriate phone use without harm may lead to coaching or a written notice following assessment. Repetition after a communicated instruction may justify a written warning. Attendance recording fraud, material confidentiality breaches, harassment or safeguarding failures require formal investigation and may justify stronger action. Serious harm or risk requires immediate protection and any necessary authority report. Termination without notice always requires a specific Article 44 basis and its statutory conditions. This guidance is not an automatic penalty tariff.

12.2 Legal reference register

References below were checked on 30 September 2026. HR shall retain the current official texts. Older guides may not reflect later amendments. Article references in this policy relate to Federal Decree Law No. 33 of 2021 unless stated otherwise.

Federal Decree Law No. 33 of 2021 as amended — Employment rights, employer duties, leave, discipline and termination

<https://uaelegislation.gov.ae/en/legislations/1541>

Cabinet Resolution No. 1 of 2022 — Work regulations, working patterns and procedural controls

<https://uaelegislation.gov.ae/en/legislations/1547>

UAE Government payment of wages guidance — Ministerial Resolution No. 340 of 2026 and current WPS requirements

<https://u.ae/en/information-and-services/jobs/employment-in-the-private-sector/payment-of-wages>

UAE Government employment contract guidance — Contracts and probation

<https://u.ae/en/information-and-services/jobs/employment-in-the-private-sector/job-offers-and-work-permits-and-contracts/employment-contracts-duration-and-models-in-the-private-sector>

UAE Government working hours guidance — Hours, breaks, Ramadan and overtime

<https://u.ae/en/information-and-services/jobs/employment-in-the-private-sector/working-hours>

UAE Government leave guidance — Annual, sick, maternity, parental and other leave

<https://u.ae/en/information-and-services/jobs/employment-in-the-private-sector/types-of-leaves-and-entitlements-in-the-private-sector>

UAE Government disciplinary guidance — Investigation and sanctions

<https://u.ae/en/information-and-services/jobs/employment-in-the-private-sector/disciplinary-rules>

UAE Government termination guidance — Notice and statutory dismissal protections

<https://u.ae/en/information-and-services/jobs/employment-in-the-private-sector/job-offers-and-work-permits-and-contracts/terminating-employment-contracts>

UAE Government end of service guidance — Gratuity and final payments

<https://u.ae/en/information-and-services/jobs/employment-in-the-private-sector/end-of-service-benefits-for-employees-in-the-private-sector>

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