



مهارات Maharat
Learning Center مركز تعليمي

OPERATIONS POLICY

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مهارات تعليمي
Maharat Learning Center

Learning Center

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1. Purpose and Objective

- 1.1 This Operations Policy for Maharat Learning Center (MLC) has been created to provide documentation, clarification and guidance to staff and relevant external regulatory parties, including but not limited to regulatory bodies, accreditation bodies and auditors, on the MLC scope of services, leadership and governance structure and the policies and procedures established by and implemented within the company.
- 1.2 The Operations Policy details the company's vision and mission, values, code of conduct, company structure, roles and responsibilities of staff, core functions and procedures of the company, services provided and the strategic direction of the company.
- 1.3 In addition to this Operations Policy, individual policies and plans referred to herein provide further access, guidance and information to the protocols and processes of the company.

2. Scope

- 2.1 The Operations Policy and the guidelines and procedures contained herein shall apply to all company employees, clients and visitors of MLC.

3. Definitions and Abbreviations

- 3.1 **MLC:** Maharat Learning Center
- 3.2 **CDA:** Community Development Authority
- 3.3 **KHDA:** Knowledge and Human Development Authority
- 3.4 **CEO/MD:** Chief Executive Officer/Managing Director
- 3.5 **PD:** Principal Director
- 3.6 **SSA:** School Support Advisor
- 3.7 **HOD:** Head of Department
- 3.8 **HR:** Human Resources
- 3.9 **IT:** Information Technology
- 3.10 **ABA:** Applied Behavioral Analysis
- 3.11 **SLD:** Specific Learning Difficulties
- 3.12 **ADHD:** Attention Deficit Hyperactivity Disorder
- 3.13 **ASD:** Autism Spectrum Disorder
- 3.14 **ADD:** Attention Deficit Disorder
- 3.15 **FBA:** Functional Behavior Assessment
- 3.16 **IEP:** Individualized Education Plan
- 3.17 **BSP:** Behavior Support Plan
- 3.18 **QM:** Quality Management
- 3.19 **QIP:** Quality Improvement Plan
- 3.20 **HSE:** Health, Safety and Environment
- 3.21 **KPI:** Key Performance Indicator
- 3.22 **CSR:** Corporate Social Responsibility

- 3.23 **CG:** Corporate Governance
- 3.24 **RBT:** Registered Behavioral Technician
- 3.25 **UAE:** United Arab Emirates

4. Company Description

- 4.1 MLC has been established to provide children and young adults with special educational needs the tools and strategies they need to access and succeed in mainstream education. MLC is a smart learning center equipped with the latest state of the art technology for learning and teaching.
- 4.2 MLC provides a variety of specialized programs for children and young adults with a variety of learning and special educational needs. MLC provides educational, therapeutic, consultation, and training services for children and young adults with learning, developmental, and behavioral challenges as well as training and professional development for schools, nurseries, learning centers and professionals.
- 4.3 Services provided at, or in the process of being developed, at MLC include educational, developmental and behavioral assessments, education services including our Maharat Learning Academy which provides a differentiated education program for children of determination who can't yet access mainstream school, 1:1 behavioral intervention and learning support services, school inclusion and support services, professional training, vocational and life skills training, tertiary education support and job coaching.
- 4.4 The MLC model for delivering behavioral, learning and inclusion support services will meet the requirements of children and young adults with specific learning difficulties including Dyslexia, Dyscalculia, Attention Deficit Hyperactivity Disorder (ADHD) and Autism Spectrum Disorder (ASD) as well as cognitive disorders and other developmental delays and learning difficulties that may be affecting their academic performance, and inclusion in to the broader community.
- 4.5 In order to provide the highest quality of care, education and support, our Training and Professional Development Center and Resource Center provides a variety of educational and training services to schools and nurseries, teachers, special educators, professionals and the community.
- 4.6 Maharat Learning Center accepts children up to 18 years and young adults up to the age of 25.

5. MLC Mission and Vision

5.1 Our Mission

- 5.1.1 Our Mission is to provide an enabling environment for individuals facing various challenges and support them with the necessary life skills, academics,

technology skills, vocational training, job placement and coaching for successful inclusion.

5.2 Our Vision

5.2.1 Our Vision is to become the leading technology-driven Educational Institute that empowers and enables individuals with variable degrees of learning difficulties, cognitive challenges and other developmental delays.

5.3 Our Purpose

5.3.1 We want to make a difference in the lives of our clients. With a view that someday, they will no longer be different but they will rightly be integrated into an inclusive environment. MLC strives to 'Bridge the Gap'.

6. MLC Values

6.1 At MLC we pride ourselves on our values and we continuously strive to live by them as best as we can. These values guide the way we operate and conduct ourselves with our team members, our clients and the community at large. Our values are:

- **Passion**
Passion is at the heart of what we do. We inspire others with our thirst for excellence.
- **Integrity**
We are honest, open, ethical, and fair. We always do the right thing.
- **Ownership**
We deliver our very best in all we do, we hold ourselves accountable for results.
- **Respect**
We treat people with courtesy and connect with dignity and respect.
- **Humility**
We are caring, kind and humble; we live with gratitude.
- **Diversity & Inclusion:**
We appreciate and acknowledge our differences. We take pride in and celebrate diversity.
We help to create a culture of warmth and belonging, where everyone is welcome.
- **Collaboration**
We are one team and one family. We work together for the common good.
- **Innovation**
We are continuously moving forward, innovating, and improving. We are tenacious.
- **Contribution**
We contribute positively to our communities and our environment.
- **Above & Beyond**
We deliver what we promise and exceed expectations

7. MLC Code of Conduct & Business Ethics

- 7.1 This code applies to all of the operations of MLC, and its subsidiaries and sets out the minimum standards which Management expects from staff in their internal and external dealings with colleagues, customers, stakeholders and third parties.
- 7.2 The Company's basic standards of conduct state that:
- Every aspect of business will be conducted with honesty, integrity, and openness, respecting human rights and the interests of our employees, customers and third parties.
 - The legitimate interests of third parties with whom the Company has dealings with will be respected.
 - The highest standards of integrity will be maintained at all times. The Company will not promise more than it can reasonably deliver or make commitments it cannot or does not intend to keep.
- 7.3 In terms of its employees, the Company maintains:
- It is committed to creating and maintaining a safe and healthy working environment for its employees.
 - It will strive to create a workplace in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of the company.
 - It will respect the individual and each other's rights, customs and traditions
 - It will work towards achieving a diverse workforce, recruiting, employing and promoting employees only on the basis of objective criteria and the qualifications and abilities needed for the job to be performed.
 - It will maintain good communications with employees through our information and consultation procedures.
 - It will assist employees in realizing their potential.
- 7.4 In terms of its clients, the Company maintains:
- It is committed to providing a safe, value for money, high quality, and consistent, accessible and reliable services to its customers.
- 7.5 In terms of its shareholders, the Company maintains:
- It will conduct its operations in accordance with the principles of good corporate governance.
 - It will provide timely, regular and reliable information on the business to all shareholders.
- 7.6 In terms of its business partners and stakeholders, the Company maintains:
- It aims to develop strong relationships with its suppliers, stakeholders and others with whom the Company has dealings, based on mutual trust, understanding and respect.
 - In those dealings, the Company expects its partners to adhere to business principles consistent with its own.

- It will conduct its operations in accordance with the principles of fair competition and applicable regulations.

8. MLC Strategy

8.1 Strategy for 2019-2021

8.1.1 MLC fulfills its mission and vision by promotion of our company values, strategic objectives, and quality improvement goals. The setting of strategic objectives helps MLC achieve its mission and move closer towards its vision. As such, the company has created a Strategic Objectives Plan 2019-2021 (CG004).

8.1.2 The Strategic Objectives Plan for Maharat Learning Center (MLC) has been created to:

- Enable MLC to achieve its strategic aims and objectives through the development and embedding of effective and efficient performance management arrangements;
- Provide a performance management framework that will support departments, teams and individuals to achieve their assigned objectives;
- Maximize the performance and contribution of staff in order to improve efficiency.
- Foster a culture that encourages excellence of performance.
- Ensure that staff is aware of their key tasks and how they relate to department goals and how their performance will be measured.
- Promote open and constructive communication to identify areas for improvement, acknowledge accomplishments and achieve optimal performance.

8.1.3 The Strategic Objectives Plan details the company's purpose, vision and mission, values and strategic performance plan established for the organization and how the strategy is applied with each department as well as for individual employees and implemented within the company.

8.1.4 The Company's Strategic Objectives Plan for 2019-2021 focuses on the following 4 key areas:-

1. **Growth & Sustainability**
2. **Excellence in Customer Service**
3. **Creating the Culture of Quality Care**
4. **Innovation and Learning**

8.1.5 In order to meet the strategic objectives set, the company will focus on the following strategy pillars over the next 3 years (2019 – 2021):

1. **Infrastructure:** Systems, Plans and Policies
2. **Company:** Talent Management, Recruitment & Staff Development
3. **Brand:** Sales/Marketing & Public Relations

4. **Development of Programs:** Behavioral Intervention, Children & Young Adult Education, Inclusion, Life Skills, Tertiary Education Support, Job Coaching, Job Placement, Training & Professional Development
5. **HSE:** Health & Safety and Quality Assurance
6. **Client Experience:** Create a unique client experience based on respect, care and empathy
7. **Community:** Create and build partnerships with key authorities and stakeholders and aim to raise awareness and advocate for inclusion in the community.

8.1.6 Our strategic objectives are reviewed and achievement is continuously monitored, measured, and reviewed through a performance measurement and quality improvement system which, includes measurement of key targets and key performance indicators (KPI's), annual staff evaluations, client and employee satisfaction surveys, and internal self-assessments.

8.1.7 The Company's Senior Management conducts its strategic analysis at the end of each year, after a comprehensive review of all performance results for the past year. After review and analysis is completed, Senior Management determines the key areas for improvement and new strategic objectives are developed. Strategic objectives are communicated to all HODs and performance report guidelines are developed.

8.1.8 HODs complete monthly performance reports, which includes data/statistics aligned with the department performance measures and operational targets. The monthly reports are submitted to the QCBD Manager, who creates a quarterly report based on the data. The Senior Management team review and analyze the monthly and quarterly reports, utilizing formal and informal strategic analysis tools.

8.2 Strategic Objectives Plan Policy

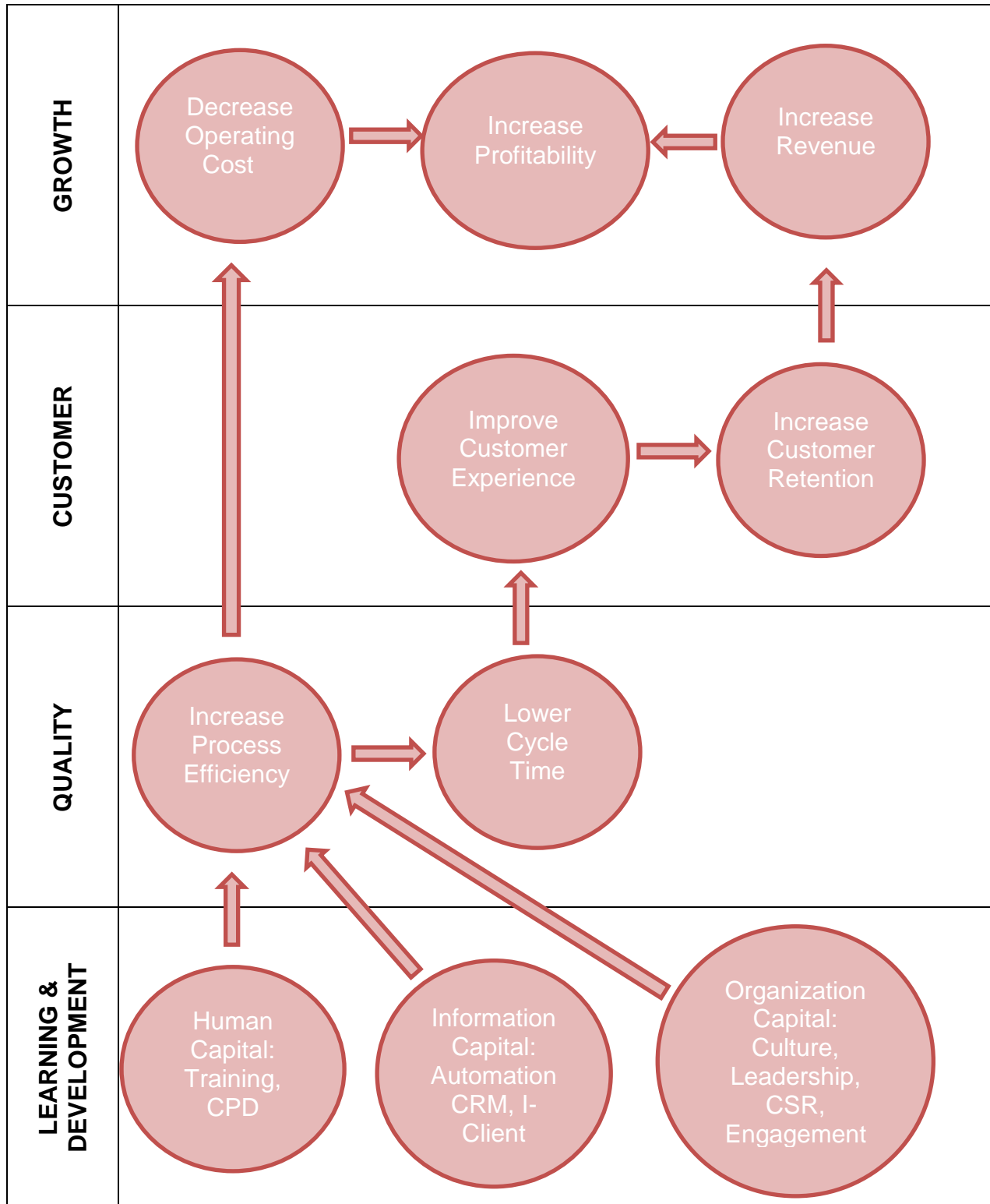
8.2.1 MLC strives to provide an environment where all employees understand the impact their contributions have on the achievement of company goals and are provided the opportunity for ongoing personal growth. One way we can accomplish this goal is through a strong performance based management program that culminates in an annual performance review.

8.2.2 A suite of performance measures have been developed that directly align with the strategic objectives and provide structure to a range of indicators and associated targets. These measures also assess our performance against the outcomes and standards detailed in the Strategic performance goals and can be clearly tracked measured and demonstrated.

8.2.3 Furthermore, departmental based activity plans are developed to detail the actions that will be progressed at team level to ensure the successful implementation of the strategic objectives. These in turn are cascaded to the KPIs for individual team members, ensuring a clear link between our strategic objectives and the work of all team members across the Group.



8.3 MLC Strategy Map



8.4 MLC Strategic Goals, Objectives & Measures 2019 – 2021

	GOALS	KEY OBJECTIVES	MEASURES	TARGETS
GROWTH	Survive	Manage operating cost and profitability	Cash Flow break even as % of Turnover	Increase by 25%
		Effective Assets & Resource utilization	Overheads as a % of sales	Less than 70%
	Succeed	Achieve profitability	Profit Margin	Increase by 5%
		Drive rapid revenue growth	Sales Growth	Increase by 20%
	Prosper	Revenue from new or rebranding services and/or business expansion	Market Share	Increase by 15%
CUSTOMER	Satisfy	Achieve high customer satisfaction	Customer Satisfaction Score (CSAT)	Increase by 5%
	Retain	Improve customer retention by providing services that are consistent & timely	Customer Retention Rate (CRR)	Increase by 5%
	Excel	Provide positive customer experience	Net Promoter Score (NPS)	Increase by 5%
QUALITY	Comply	On time response	On Time Rate	+90%
	Improve	Improve quality	Audit Score	+90%
	Optimize	Drive operational excellence	Incidents & Internal concerns	Reduce by 5%
LEARNING & DEVELOPMENT	Innovate	Automation of system & processes	CRM/ I-Client	+75% Usage
	Develop	Develop staff through continuous professional education	Training Hours per employee	+10 hours
	Engage	Increase employee engagement & improve staff retention	Employee Satisfaction (ESAT)	+85%

9. MLC Facility

9.1 Location/Contact Details

- 9.1.1 The Maharat Learning Center facility is located in Marza Plaza, Suite HP011, Ground Floor, Dubai Festival City, Dubai, UAE.
- 9.1.2 The PO Box for Maharat Learning Center is PO Box 85864.
- 9.1.3 Maharat Learning Center may be reached on its main telephone number +971 4 288 8104 or general e-mail info@maharatlearning.com.

9.2 Description of the Center Facility

- 9.2.1 The Center space is approximately 6,500 square feet over two levels, with designated rooms and offices that include:

Lower Level:

- A reception desk/area and two waiting areas
- Records room
- CEO/MD office
- Principal Director's office
- Behavioral Supervisor/Coordinator office
- One Special Education classroom
- One 1:1 Behavioral Intervention classroom
- One 1:1 Behavioral Intervention/Life Skills multi-use classroom
- One Multipurpose/Multi-use room (for training, intervention as needed)
- One disabled toilet
- One female toilet
- One male toilet
- One private changing room/storage room
- One kitchenette
- One IT server room

Upper Level:

- Open plan office area with desks and workstations for staff
- Human Resources (HR) Manager's office

9.3 Hours of Operation

- 9.3.1 MLC is open from Saturday to Thursday, 8:00AM to 6:00PM and is closed on Fridays. Walk-in and telephone inquiries can be made during these hours. MLC is closed at 6:00PM and phone lines are switched off after business hours. Messages made outside these hours will be registered with an answer-phone service and calls will be returned as soon as possible.

9.3.2 Clients and staff may utilize email in order to communicate with MLC after hours, and clients may reach the Client Relations staff via email at clientrelations@maharatlearning.com, Scheduling staff at scheduling@maharatlearning.com and/or Human Resources staff on hr@maharatlearning.com. Emails will be responded to as soon as possible during working hours.

9.3.3 Services are available Saturdays – Thursdays, between the hours of 8:00AM and 6:00PM, subject to availability. Behavioral intervention sessions and learning support (paraeducator/school shadowing) services shall be no less than two (2) hours in duration and sessions for all other programs shall be no less than one (1) hour in duration.

9.3.4 The Maharat Learning Academy shall provide services Sundays – Thursdays, between the hours of 8:00AM-3:00PM, three terms per year during the period September - June, with the exception of the pre-scheduled academic term breaks and public holidays.

9.3.5 Employees shall have access to the MLC facility during their normally scheduled hours of work, and outside their normal hours of work if/when on company business.

10. MLC Services

10.1 Scope of Services

10.1.1 The services provided (or planned to be provided when launched) at MLC are:

- Maharat Learning Academy
- Behavioral Intervention/Learning Support Services
- Inclusion and School Support Services
- Functional Independence and Tertiary Education Support
- Vocational Support/Job Placement and Coaching
- Training and Professional Development Center
- Academic and Technology Resource Center
- Tutoring for Specific Learning Difficulties

10.1.2 Dependent on the services provision, our services may be provided at the MLC facility, at a Client's home, in a school, or on outings. Without prejudice to the foregoing obligation, MLC staff must take all reasonable security precautions whenever services are provided outside of the Center.

10.1.3 Administrative departments/functions at MLC are:

- Human Resources (HR)
- Client Relations (including front desk staff)
- Scheduling
- Accounting
- Marketing
- Information Technology (IT)

- Quality Compliance / Business Development

10.2 Description of Services

10.2.1 Maharat Learning Academy: The Maharat Learning Academy provides a differentiated educational program to children and young adults with a range of special educational needs or who require specialized teaching approaches to help and support them to learn effectively. Classrooms and schedules follow a typical school environment, and students may learn on a 1:1, 2:1 or in a small group basis. Our Learning Academy program offers a differentiated and flexible approach to learning that incorporates academics, life skills and technology and is designed to provide a truly individualized yet progressive learning environment that is developmentally driven and emphasizes each child's unique learning styles to ensure optimal learning. Every child will have an Individualized Education Plan (IEP) with all relevant domains including:

- Behavior
- Communication
- Social/Emotional
- Motor
- Executive Functioning
- Academic
- Functional Independence
- Vocational

10.2.2 Behavioral Intervention Services: Our Behavioral Intervention team implements programs for children and young adults with cognitive disorders, developmental delays, learning difficulties and/or behavioral concerns. Applied Behavioral Analysis (ABA) is a widely known teaching technique that is used for behavioral modification and to teach children with developmental and cognitive delays the social, adaptive and academic skills necessary for them to access mainstream education. Our programs utilize multiple ABA principles and techniques including Structured Teaching, Discrete Trial Instruction, Verbal Behavior, Pivotal Response Training and Naturalistic Teaching Approach in an age-appropriate individualized program with learning objectives to reflect each child's strengths and needs. Our team provide children with a range of programs addressing self-help skills, school preparation, communication and social skills, reading, writing, executive functioning and theory of mind. Services available from our Behavioral Intervention team include:-

- 1:1 Behavioral Intervention (in Arabic & English language)
- School Shadow / Paraeducator Provision
- Functional Behavior Assessments (FBAs)
- Development of Individualized Education Plans (IEPs)
- Development of Behavior Support Plans (BSPs)
- Consultation services for children and young adults enrolled in mainstream education

- Parent, Caregiver, Teacher/Learning Support training on the principles of ABA, behavior management techniques, reinforcement, prompting and fading and levels of assistance
- International Supervision Program (for clients living outside Dubai)

10.2.3 Inclusion and School Support Services: Maharat Learning Center supports the inclusion of students with special educational needs, cognitive disorders, development delays and learning difficulties in mainstreams schools. We can provide students with trained school shadows and paraeducators, assist teachers in developing comprehensive and holistic Individualized Education Plans (IEPs) and Behavioral Support Plans (BSPs), and provide monthly supervision in the school to ensure students are included successfully. Should the recommendation be for a child to be in an inclusive school setting, we can provide supporting documentation, can attend any preparation meetings should the parent/school request it and share information to specify how we plan to support the child, family and school.

10.2.4 Tutoring for Specific Learning Difficulties: Our tutoring program for Specific Learning Difficulties (SLD) provides children and young adults the tools and strategies they need to learn to succeed and lead happy and successful lives. Our tutoring program provides individualized and age-appropriate learning objectives to reflect each child's strengths and needs and measurable targets are established as achievement goals for the program. The program may include phonics, sight reading, vocabulary, reading comprehension, writing including grammar and punctuation, spelling rules, assistive technology and typing. We support students with the following:

- Dyslexia
- Dyscalculia
- Dysgraphia
- Autism Spectrum Disorders
- Attention Deficit Hyperactivity Disorder (ADHD)
- Attention Deficit Disorder (ADD)
- Visual Processing Disorder
- Auditory Processing Disorder

10.2.5 Functional Independence and Tertiary Education Support: We support children from the age of 10 years and above to learn Adaptive Functioning Skills which refers to a wide range of communication and social skills, daily living skills, problem-solving skills, leisure skills, safety skills, employment and/or school skills, and functional academics. Adaptive Functioning Skills are necessary skills for functioning daily, and we, recognize the need to teach children and young adults these skills in a very individualized manner.

10.2.6 Vocational Support/Job Placement and Coaching: Maharat Learning Center provides vocational support, job placement and coaching to prepare young adults with developmental and cognitive challenges for success in the workplace. Our learning experiences range from basic communication, daily

living and work preparation skills, to functional academics, technology and community-based work/study programs.

10.2.7 Training and Professional Development Center: Our Training and Professional Development Center is committed to delivering the best quality of professional development and we select and provide highly qualified and respected professionals in their field to deliver our courses and training programs. We provide a variety of professional trainings for teachers, school shadows, learning support assistants and special educators to ensure the successful inclusion of children and young adults. Additionally, we provide parental/caregiver trainings to enhance parental skills and knowledge on effective behavioral management, emotional and communication development, building social skills through positive parent-child interaction and fostering children's language or literacy development.

10.2.8 Academic and Technology Resource Center: Maharat Learning Center provides academic and technological resources to support children and young adults in developing appropriate skills for success in mainstream schools. In line with our Vision to become the leading technology-driven Educational Institute, our Academic and Technology Resource Center enhances our teaching efficiency and productivity by utilizing e-learning and online resources, teaching and learning apps, multimedia technology, educational software and assistive technology on an interactive resource platform that engages everyone in the learning process.

10.2.9 Additional information on MLC services and departments is provided in the company's internal policies and procedures, the MLC Parent Handbook (CR004), in marketing materials such as brochures and our website www.maharatlearning.com.

11. Company Structure

11.1 Chief Executive Officer/Managing Director: The duties of the CEO/MD at MLC include, but are not limited to, setting the company objectives and strategy, oversight, management and planning of company budget and finances and managing and supervising the corporate governance and administrative operations of the company and staff. Further responsibilities include strategizing and planning the company's strategic goals works jointly with the management and leadership team, writing, issuing and/or approving policies and procedures, recruiting staff, regularly meeting with staff across all departments, administering company contracts, ensuring satisfaction of governmental requirements, and licensing staff and offering supervision, guidance and training to MLC staff.

11.2 Principal Director: The duties of the Principal Director (PD) include providing management, oversight and supervision of behavioral intervention and learning support services and staff, to enable the company and staff to perform within their respective scope of practice, provide appropriate

leadership, writing, issuing and/or approving policies and procedures and ensuring the highest standards of ethical performance and conduct is maintained. The PD is the Head of Department (HOD) for the Behavioral Intervention Department/Learning Support Department and the Maharat Learning Academy, and is responsible for the overall planning, development, management and supervision of these departments and staff. The PD is responsible for creating and developing individualized plans and programs, providing recommendations, report writing, training, mentoring, and continuous education of staff. Responsibilities include, case supervision, conducting case overlaps, school observations, parent meetings, team meetings and trainings. The PD conducts the initial Intake Meeting for our services and determining the best program model for each potential child enrolling for services.

- 11.3 **Program Director:** The Program Director is responsible for the overall case management and supervision of individual cases, oversight and supervision of behavioral intervention/learning support services and staff as assigned by the PD. The Program Director is responsible for creating and developing individualized plans and programs, providing recommendations, report writing, training, mentoring, and continuous education of staff. Responsibilities include, case supervision, conducting case overlaps, school observations, parent meetings, team meetings and trainings. In the absence of the PD, or as appointed by the PD, the Program Director may conduct the initial Intake Meeting for Behavioral Intervention services and determining the best program model for each potential child enrolling for services.
- 11.4 **Behavioral Supervisor:** Reporting to the Principal Director, the Behavioral Supervisor is responsible for case management and supervision of individual cases, as assigned by the PD. The Case Supervisor is responsible providing program updates and adjustments, and writes and prepares update/progress reports. Responsibilities include case overlaps, school observations, parent meetings, team meetings, mentor meetings and trainings. The Behavioral Supervisor ensures clients receive effective plans and programs through supervision and continuous coaching of Behavioral Technicians.
- 11.5 **Behavioral Coordinator:** The Behavioral Coordinator provides the day to day coordination required in order to ensure each child's service provision team is implementing programs in accordance to each child's individual program plan. The Behavioral Coordinator acts as a liaison between parents, the Principal Director, Program Director, Behavioral Supervisor and Behavior Technicians to provide ongoing guidance and support within each child's individualized program to ensure their continued improvement and progression towards realizing their maximum potential. Responsibilities include case overlaps, school observations, school meetings, parent meetings, team meetings, trainings, and providing 1:1 behavioral intervention.
- 11.6 **School Support Advisor:** School Support Advisors (SSA) are additionally trained Senior Behavior Technicians who are dedicated to offering direct support to children in school and will be available to conduct school

observations, FBAs, school shadow training, and assist with IEP implementation as needed throughout the school year.

- 11.7 **Behavior Technician:** Behavior Technicians are responsible for day to day implementation of behavioral intervention programs. Behavior Technicians are divided into four categories internally; Junior Behavior Technician Junior Registered Behavior Technician, Lead Registered Behavior Technician and Senior Registered Behavior Technician, and designations are commensurate with education, experience, skill level and attainment of the Registered Behavior Technician (RBT) credential. Behavioral Technicians are responsible for providing direct 1:1 behavioral intervention or school shadow services with clients in accordance with the individualized programs, recording data on the programs, providing feedback to parents and caregivers and attending and participating in client team meetings.
- 11.8 **Learning Coordinator:** The Learning Coordinator's role is to plan and deliver daily lessons and functional academic programs under the curriculum to children attending the Maharat Learning Academy. The Learning Coordinator is responsible for planning appropriate activities to stimulate learning and motivation while encouraging the positive development of skills and behaviors, development and implementation of IEPs and reviews paraeducator data collection, behavior management techniques, and program implementation, including the frequency of programs targeted, and provides constructive feedback and model IEP programs. The Learning Coordinator will monitor, assess and communicate the progress and well-being of the children in their care to the Principal Director and the Parents/Guardians of the child and attend related meetings.
- 11.9 **Learning Support Assistant:** The Learning Support Assistant works in conjunction with the Learning Coordinator to assist children who need extra support to complete tasks, assists in the operation and implementation of the Maharat Learning Center classroom and is responsible for getting the classroom ready for lessons, helping the Learning Coordinator to plan learning activities and supporting the Learning Coordinator in managing class behavior.
- 11.10 **Paraeducator:** Paraeducators provide school shadow support to children who need extra support to complete tasks within the classroom. Paraeducators work internally to support Maharat Learning Academy clients and externally with clients at their designated school.
- 11.11 **Specific Learning Difficulties Educator:** Specific Learning Difficulties (SLD) Educators are responsible for providing direct 1:1 tutoring to children and young adults with learning difficulties. SLD Educators assist in IEP goal development and training to ensure that the IEP is delivered as intended, revisions are made when applicable and overall case management of the individualized tutoring program for the client.

- 11.12 Operations Support Officer:** Reporting to the Principal Director, the Operations Support Officer has the scope of responsibilities including schedule and correspondence management for the Principal Director, coordination of Intake Meeting appointments with the Client Relations team and preparation and communication of quarterly team/parents meeting schedules with clients and applicable staff. The Operations Support Officer is responsible for 'scheduling' duties including creating and coordinating the permanent, weekly and daily client and Behavior Technician schedules, working closely and in conjunction with all departments across the company and corresponded with clients on a regular basis regarding scheduling matters.
- 11.13 Center Manager:** Reporting the CEO/MD, the Center Manager is responsible for the daily supervision and management of administrative personnel and activities in the Client Relations Department and Housekeeping. The Center Manager is responsible for Client Relations management of the functions including directing and managing new client and existing client inquiries, program enrollment services, handling the internal referral process, incident reporting, complaint management, client exits and client records management. Further duties of the Center Manager include providing general oversight and management of day to day administrative operations and activities at MLC, strategizing and planning the company's objectives and strategic goals, recruiting staff, regularly meeting with staff across all departments, administering company contracts, and offering supervision, guidance and training to MLC administrative staff. The Center Manager is responsible for ensuring the quality and integrity of the Centers' services and staff, day to day management of the Centers, measurement and monitoring of the organization's key processes, health and safety, patient safety, infection control, emergency preparedness, client records, client satisfaction and other projects being conducted by the organization.
- 11.14 Client Relations Officer:** Reporting to the Center Manager, the Client Relations Officer is the point of contact for all new and existing clients to the Center. The Client Relations Officer is responsible for handling new client services, and to conduct initial communication and follow up communication with potential new clients and existing clients, providing all relevant information about company services; explain all paperwork, policies, and procedures, scheduling the initial consultation appointments, assessment appointments and intake appointments, working closely and in conjunction with all departments across the company.
- 11.15 Client Relations Administrator:** Reporting to the Center Manager, Client Relations Administrators are responsible for the reception/front desk functions of the Center and are responsible for answering a high volume of calls, greeting clients and directing them to the appropriate contact and taking/relaying messages. The Client Relations Administrators are responsible for setting up enrollment records and allocation of enrollment numbers, working with the Operations Support Officer to coordinate daily Behavior Technician and client schedules and handle any requests for daily

schedule changes such as substitute sessions or cancellations and receive payments for Services from clients. They provide clients with general information about the Center and provide general administrative tasks such as organizing meetings, filling, photocopying and ordering stationary.

- 11.16 **Head of HR/HR Manager:** The HR Manager is responsible for the management and implementation of all Human Resources activities for the company including recruitment and staff planning, performance evaluations, employee compensation and benefits, employee conduct and disciplinary action, employee grievances, writing, issuing and/or approving policies and procedures, regularly meeting with staff across all departments, administering employee contracts, ensuring satisfaction of governmental requirements and licensing staff under application regulations and UAE Labor Laws.
- 11.17 **HR Officer:** Reporting to the HR Manager, the HR Officer is responsible for maintaining the company HR functions in conjunction with the HR Manager including recruitment, maintaining of employee records (manual and electronic), licensing staff, visa applications, trade licensing, employee health insurance and payroll.
- 11.18 **Head of Accounting & Internal Audit:** The Head of Accounting and Internal Audit is responsible for the management of all company financial and accounting systems including, but not limited to, budgeting, financial and cash flow forecasting, accounts receivable, accounts payable, payroll.
- 11.19 **Accountant:** The Accountant is responsible for invoicing, payables, receiving client payments, staff payroll, and maintaining the accounting and financial systems for MLC including, but not limited to the preparation of monthly reports, income statements, cash flows, receivables and staff hours calculations as directed by the Head of Accounting and Internal Audit.
- 11.20 **Information Systems Manager:** The Information Systems Manager has overall responsibility for all computer, software and telephone requirements for the Center and plans, controls, directs and evaluates the operations of new and existing IT systems and electronic data processing, including providing technical support, programming, maintenance of the internal Child-Pro CRM system and external iClient system.
- 11.21 **Software Developer:** The Software Developer works closely with the Information Systems Manager in using languages, framework such as Java, Mysql, Primefaces, Glassfish or other application server developing the necessary specifications for software, assisting in creating user's manual such as CRM, iClient and other application to be developed and creating, maintaining and implementing the source code that makes up the application assigned by the IT Manager.
- 11.22 **IT Technician:** The IT Technician tests and maintains the core product software and databases to ensure strong optimization and functionality for the company, determining appropriate architecture, and other technical solutions, and make relevant recommendations to the team.

- 11.23 IT & Social Media Coordinator:** The IT & Social Media Coordinator is responsible for the ongoing management and growth of the company's social media presence in alignment with business strategies and direction and is responsible for creating and maintaining a company's presence on social media sites, which include the Website, Facebook, Twitter, YouTube and Instagram.
- 11.24 Junior Graphic Designer:** The Junior Graphic Designer is responsible to develop graphic designs for all marketing materials such as invitations, flyers, brochures, ad banners, manual, printed ads as required, and to manage and coordinate graphic design from concept through completion.
- 11.25 Quality Compliance & Business Development (QCBD) Manager:** The QCBD Manager is responsible to plan and develop operational quality and business development objectives by preparing and completing action plans; implementing production, productivity, quality, and customer-service standards; resolving problems; completing audits; identifying trends; determining system improvements and implementing change.
- 11.26 Housekeeper:** Housekeepers are responsible for the day to day environmental cleaning, waste management and upkeep of the Center. They also assist technicians/paraeducators with toileting/changing of children, assist with making materials required for programs, and are responsible for stocking and controlling the kitchen/pantry of the Center.
- 11.27 Maintenance/Driver:** The Maintenance/Driver for the Center is responsible for day to day handyman and maintenance works, painting and driver duties as required.
- 11.28** Full job descriptions for the all staff working within MLC are available from the HR Department.
- 11.29** The Organizational structure for MLC is provided at Attachment A.

12. Leadership, Governance and Management

12.1 Leadership and Governance Responsibilities

- 12.1.1** MLC believes that sound governance is imperative to creating value, maintaining the confidence of its clients, and ensuring the long-term viability and success of the Company. Governance encompasses the Company's processes and policies, how decisions are made, and how the Company handles the various interests of, and relationships with, stakeholders, customers, employees, and the broader community.
- 12.1.2** The Company recognizes the need to adhere to best practices in governance, and the Company's governance practices are consistent with the best practice guidelines of the Community Development Authority (CDA) and the general legal framework governing the UAE.

12.1.3 Governance and Leadership responsibilities at MLC ensure there are systems, processes, policies and plans for:

- Identifying and documenting the governance and management structure and staffing plans.
- Determining the company's direction.
- Setting objectives, goals, and key performance indicators.
- Defining, approving and reviewing delegation of responsibilities to the staff.
- Ensuring that the company's policies, procedures, guidelines, plans and processes required in directing the company in achieving its mission is defined, current, approved and implemented.
- Defining the role of governance and management in assuring quality, health & safety and risk management.
- Ensuring compliance with applicable policies, regulations, rules, standards and laws.
- Monitoring achievement of defined objectives using quality performance process and outcome measures.
- Ensuring that high quality Social Care services are provided.
- Measuring, monitoring, improving and sustaining the quality of delivered services.
- Promoting education and training for the staff to ensure continuous professional development.
- Conduct audits to review, measure, and monitor and improve service provision.
- Identifying risks for service users, staff and company.
- Identify ethical dilemmas, document process to receive ethical dilemmas and resolving these dilemmas in timely manner.
- Ensure that data collection and analysis is done and utilize this information to make decisions and improvements.

12.2 Corporate Governance

12.2.1 Along with this policy, the Company's Corporate Governance Policy (CG002) and Delegation of Authority (CG003) describe the corporate and operational governance structure of the Company and is designed to ensure the independence of the appointed Levels of Authority in order to effectively supervise the management of the Company.

12.3 Social Care Governance

12.3.1 The Company's Social Care Governance Policy (QM016) details the Social Care service provision structure of the Company and sets out the approach to Social Care Governance for MLC in line with best practice standards and the CDA Standards for Social Care services delivery.

13. Human Resource Management

13.1 Human Resources Policies / Guidelines

13.1.1 The Company's HR Department has developed comprehensive policies, procedures and guidelines, to provide sound frameworks for HR functions. These are:-

- HR028-Employee Internal Guidelines
- HR029-HR Standard Operating Procedures
- HR031- Recruitment and Talent Management Policy
- HR032-Performace Management & Professional Development Policy
- HR033-Employee Health & Wellness Policy

13.2 Employee Internal Guidelines

13.2.1 The Employee Internal Guidelines (HR028) have been created to provide employees with information about working conditions, employee benefits, and other policies affecting their employment. Employees should read, understand, and comply with all provisions of the Employee Internal Guidelines as they describes many of the responsibilities as an employee and outline the programs developed by the Company to benefit employees.

13.2.2 As the Company continues to grow, the need may arise to change, modify or discontinue policies or practices outlined in the Employee Internal Guidelines. The Company reserves the right to do so, if deemed appropriate, with sole and absolute discretion. Employees will be notified of such changes to the Employee Internal Guidelines as they occur. Employees are encouraged to check the latest version of the Employee Internal Guidelines which can be found on the Child-Pro CRM system, and to ensure that they are familiar with all available Company policies and procedures.

13.3 Staffing Plan & Recruitment

13.3.1 The Company recognizes that its staff is fundamental to its success. The Company therefore needs to be able to attract and retain staff of the highest caliber and a strategic, professional approach to recruitment is essential to do this. The Company's HR Department has developed a comprehensive Recruitment and Talent Management Policy (HR031), which provides a sound framework for the recruitment and selection of staff based upon the principles outlined below, which also meet all other relevant employment legislation.

13.3.2 The HR Manager, in conjunction with the CEO/MD and other relevant members of staff as applicable, will examine the number of staff required and the roles and responsibilities envisioned for each staff member on an annual basis. After evaluation, the management team determines the target number of staff for each department and identifies what recruitment, if any, is recommended.

13.3.3 The table below describes the Company's staffing and recruitment plan. Further details regarding the Company's staffing and recruitment processes are available in HR Recruitment and Talent Management Policy (HR031).

13.4 Current Staffing Plan Year 2018 / Target Year 2020

13.4.1 In order to run the Center and each department effectively, the HR Manager and Senior Management will meet six-monthly to agree and review staffing requirements for Center.

13.4.2 Furthermore, staffing requirements are discussed as needed at weekly, monthly and quarterly meetings including Head of Department Meetings and Operations Meetings to ensure a sufficient number of staff are available to meet changes including delivery of corporate/company goals and increased client needs.

13.4.3 The current staffing plan (Table 1) considers coverage of current services (year 2018) as well as anticipated services for the projected years (2019 and 2020), based on number of enrolled clients, projections on new client enrollment, new services to be added, variations in client flow due to school breaks and summer/spring/winter holiday periods, as well as staff leave. The anticipated numbers of staff may be subject to change if/when further variations occur and are monitored by the HR department.

Table 1

Administrative Support Team	Position	No. - Current Year 2018	No. - Target Year 2020
Management	○ Chief Executive Officer/Managing Director	1	1
	○ Quality Compliance & Business Development Manager	1	1
	○ Center Manager	1	1
Finance / Accounts	○ Head of Accounting & Internal Audit	1	1
	○ Accountant / Junior Accountant	1	2
Scheduling	○ Operations Support Officer	1	2
Client Relations	○ Client Relations Officer	0	1
	○ Client Relations Administrator	2	3
Human Resources	○ Head of HR/HR Manager	1	1
	○ HR Officer/HR Assistant	1	2
IT	○ Information Systems Manager	1	1
	○ IT Technician	1	1
	○ Software Developer	1	2
	○ IT & Marketing Administrator	1	1
Marketing	○ Sales & Marketing Officer	1	2
	○ Junior Graphics Designer	1	2
	○ IT & Social Media Coordinator	1	1
Ancillary Support	○ Housekeeper	2	3
	○ Driver / PRO	1	1
	○ Childcare Aide	0	4
	○ Administrative Assistant	0	1

Social Care Team	Position	No. - Current Year 2018	No. - Target Year 2020
Behavioral Intervention / Learning Support Department	○ Principal Director	1	1
	○ Program Director	1	1
	○ Behavioral Supervisor	1	3
	○ Behavioral Coordinator	1	4
	○ School Support Advisor	1	2
	○ Behavior Technicians – Junior/Lead/Senior	14	20
	○ Para Educator	8	14
Maharat Learning Academy (MLA)	○ Learning Coordinator	1	2
	○ Learning Support Assistant	1	2
	○ Para Educator	4	12

13.5 Employee Performance Management and Professional Development

13.5.1 Performance Management and Professional Development is the systematic process by which Maharat Learning Center (MLC) engages its employees, as individuals and members of a group, in improving organizational effectiveness in the accomplishment of the mission, the vision and the strategic goals and objectives.

13.5.2 The Performance Management and Professional Development Policy (HR032) addresses the following:

- **Performance Planning** - provides information on establishing performance expectations and goals for employees to channel their efforts towards achieving organizational objectives.
- **Monitoring Employee Performance** – provides information on the requirements to conduct at least one formal written progress review for all employees.
- **Employee Development** – provides information on the importance of evaluating and addressing employee development to increase the effectiveness of an organization.
- **Evaluating Employee Performance** – provides information on evaluating employee performance against the elements and standards in an employee's performance plan and assigning a summary rating of record.
- **Recognition** – provides information on a variety of informal and formal recognition programs, which can be used to recognize and reward employee excellence.

13.5.3 The Performance Management and Professional Development Policy and procedures contained therein, are used to communicate organizational goals and objectives, reinforce individual accountability for meeting those goals, and track and evaluate individual and organizational performance results.

14. Quality Improvement & Performance Measurement

14.1 Performance Measurement and Quality Improvement System

14.1.1 The Company maintains a performance measurement and quality improvement system to monitor the performance, satisfaction, and improvement of the company. This includes a comprehensive Quality Improvement Plan (QM015) as well as several other operational/departmental mechanisms for performance measurement. These include monthly performance statistic reports, KPIs, employee drop in evaluations, annual employee evaluations, customer satisfaction surveys, internal assessments/self-assessments, and employee satisfaction surveys, in line with the requirements of the Company's Strategic Objectives Plan.

14.2 Scope of Annual Quality Improvement Plan (QIP)

14.2.1 The annual QIP will involve all aspects of MLC's functions and will include the following activities at a minimum:

- Performance measures of social care services
- Performance measures of administrative services
- Self-assessments including but not limited to:
 - Infection Control audits
 - Client record audits
 - HSE inspections
- Risk Assessment and Incident Reporting
- Client Satisfaction Surveys
- Client and Visitor Complaints
- Employee Performance Evaluation
- Reports from Accrediting and Certifying Companies
- Document Control

14.3 Performance Management Process

14.3.1 The performance management process is used to communicate organizational strategic goals, reinforce individual employee accountability for meeting those goals, and track and evaluate individual and organizational performance results. The performance management process involves:

- Performance planning;
- Monitoring employee performance;
- Employee development;
- Evaluating employee performance; and
- Recognition.

14.4 Performance Planning

14.4.1 Expectations of employee performance are established through the objectives, Key Performance Indicators (KPI's) and standards contained in an employee's evaluation. Objectives tell employees what they have to do and standards tell them how well they have to do it. Developing objectives and standards that are understandable, measurable, attainable, and fair is vital to the effectiveness of the performance management process.

15. Client Complaints / Feedback

15.1 Client Concerns & Complaint Policy

15.1.1 In part with the Company's effort to provide clients with the highest standards of quality and care, a Client Concerns & Complaint Policy (CR008) has been created in order to ensure the Company takes the necessary steps to ensure that clients are satisfied with services and to ensure that all employees understand the process for receiving and managing client complaints. The Client Concerns & Complaint Policy is also designed to ensure that concerns and complaints are recorded, monitored, and evaluated regularly in order to ensure quality improvement.

15.1.2 Understanding how to receive and resolve client concerns and complaints is an integral part of successful customer service and quality care. As employees of MLC, it is the responsibility of all staff to ensure that client concerns and complaints are handled with efficiency, professionalism, and care at all times. As the Company works hard to promote the respect and value of all clients and families, it is imperative that all staff understand the importance of client satisfaction and feedback and its impact on the success and progress of the Centers' services.

15.1.3 It is therefore the policy of the Company that all staff understands how to receive and process a client concern/complaint in accordance with the procedures and guidelines described in the Client Concerns & Complaint Policy and all staff should familiarize themselves with the Client Concerns & Complaint Policy in order to ensure that the policy is adhered to at all times.

15.2 Client Satisfaction Survey

15.2.1 MLC is dedicated to providing clients and families the highest standards of quality and care, the careful recording, monitoring, and evaluation of client satisfaction and feedback is integral to the company's success. Client satisfaction surveys and feedback forms are used as indicators of satisfaction and system gaps, and the findings of this data are evaluated and utilized in shaping our strategic focus.

15.2.2 Client satisfaction feedback is obtained using the Client Satisfaction Survey Form which are collected by the subscribed online survey system and email

request to patients. The Company requests the completion and return of the Client Satisfaction Survey on an annual basis to all active clients.

15.2.3 The Center Manager and QCBD Manager are responsible for managing the client satisfaction and feedback process. Client satisfaction survey results are aggregated and analyzed each year to employ the ongoing use of client satisfaction feedback to monitor improvement in patients' perception of care and service delivery, as part of the annual Quality Improvement Plan.

16. Risk Management

16.1 MLC shall adopt an integrated comprehensive proactive approach designed to oversee all aspects of risk identification, risk evaluation and coordination of corrective action implementation. This shall include maintaining procedures to provide the Centers with a systematic view of the risks faced in the course of academic, administrative, and business activities and shall be consistent with the CDA Risk Management standards.

16.2 It is imperative that the Risk Management Policy and Plan (QM003) developed by MLC includes a framework for identifying sources of risk, establishing the approaches, creating a clear process for evaluating the risks, and ensuring appropriate actions and improvements are implemented. All identified risks will be recorded in the Risk Register.

16.3 The Risk Management Policy and Plan will be overseen and regularly reviewed by the CEO/MD and relevant HOD's. This team shall be responsible for the development and approval of the Risk Management Policy and Plan and setting the risk management approaches within the center.

16.4 The Management team shall provide all the resources and the training opportunities required for successful implementation of the Risk Management Policy and Plan. They shall also identify the potential risk areas within the center, assign qualified staff to assess the potential risks, identify the risk reporting mechanisms and risk management approaches, approve the final action plan and provide all the required resources to effectively minimize or prevent the occurrence of risk.

16.5 The QCBD Manager will act as the Risk Officer and shall coordinate all risk management activities, ensure that the Risk Management Policy and Plan is implemented, maintain the risk register, organize regular meetings and report to the Management team on all risk and safety issues arising from the ongoing Risk Management Policy and Plan.

16.6 Other members of staff may be identified and assigned responsibilities and authority for particular aspects of the Risk Management Policy and Plan which will be associated with their normal work activities and responsibilities.

- 16.7 All staff are empowered to identify potential risks, and can bring to the attention of the Management team or through the Center Manager and/or QCBD Manager, issues concerning safety or quality of care.
- 16.8 All staff are expected to actively support the Risk Management Policy and Plan to achieve and assure optimal care to our patients and to promote a culture that supports continuous quality improvement.
- 16.9 Additional guidelines, processes and protocols pertaining to and associated with Risk Management are provided in the Risk Management Policy and Plan (QM003).

17. Health & Safety / Infection Control

- 17.1 MLC is committed to ensuring the health and safety of its employees and clients, and our Health and Safety Program includes the Health, Safety and Environment Policy (HSE001), Infection Control Policy (HSE002), Environmental Cleaning and Waste Management Policy (HSE003).
- 17.2 These policies apply to all Company properties and to all employees and consultants working on the premises, as well as clients and visitors to the center.
- 17.3 The Company's Management is committed to dedicating the necessary resources to ensure that all employees and clients are protected from injury, health, and safety hazards, and that staff are adequately trained and educated on the fundamental components of health and safety and infection control.
- 17.4 The Center Manager is the assigned HSE Representative in-charge and is responsible for ensuring that the elements of the abovementioned policies and associated procedures and guidelines are implemented, under the guidance and management of the CEO/MD.

17.5 Security Surveillance

- 17.5.1 The Company is committed to providing a safe environment for clients, visitors and staff, and as such, the Centers' premises are under security surveillance via security cameras throughout the Center. The Center has placed prominent signage throughout the premises to ensure that Parents and staff are informed which areas are monitored. There shall be no audio on the recordings. Recordings may be viewed only for health and safety purposes and only accessible to authorized Personnel.

18. Incident Reporting Policy

- 18.1 MLC is committed to provide a safe environment for employees, clients and visitors. As such, all employees should understand the process in case an incident, injury, accident or near miss occurs. As such, the company has

created an Incident Reporting Policy (HSE020) to provide clear instructions, guidelines, responsibilities and reporting lines.

18.2 The purpose of the Incident Reporting Policy is to:

- Define incidents, accidents, injuries and near misses.
- Identify procedures to report incidents, accidents, injuries and near misses.
- Reduce the risk of safety related incidents by proactively evaluated systems in place and making necessary changes through the leadership and departmental participation.
- Identify procedures and responsibilities in case of emergency transfer of patients.

18.3 As per the Incident Reporting Policy, in the case of an incident, injury, accident or near miss occurs, whether involving a child or an employee; it is the responsibility of the employee to follow the Incident Action Plan as detailed on the Incident Action Plan Notice (HS005) which is posted throughout the Center.

19. Client Records Policy

19.1 MLC has developed strict policies and procedures regarding client records within the Client Records Policy (CR023). Access to Client Records is restricted to Client Records Custodians and relevant social care staff within the client's immediate circle of care.

19.2 The purpose of the MLC Client Records Policy is:

- To ensure that documentation of client information is performed in a manner that complies with mandatory regulatory and accrediting standards;
- Details the requirements for ensuring the confidentiality, security and integrity of client records/information;
- Specifies the essentials for maintaining client records/information to support planning and decision making, and enhance and improve the continuity of care.

19.3 The components of this Client Records Policy shall:

- Designate the essentials and responsibilities of initiating, auditing and maintaining client records;
- Protect the privacy and confidentiality of client records/information;
- Define the permissible communication with individuals requiring access to client records/information;
- Ensure client records/information is accessed and used solely for legitimate purposes;
- Protect against any reasonably anticipated threats or hazards to the security, confidentiality or integrity of client records/information.

19.4 The Client Records Policy is a companywide policy and is applicable to all staff and departments at MLC, including employees who have access to or handle client records/information.

20. Informed Consent Policy

20.1 Maharat Learning Center (MLC) is committed to ensuring clients' rights are protected, clients are informed at all times about the services provided by the Center, and ensure compliance with best practice guidelines and legal standards for valid consent.

20.2 As Such, an Informed Consent Policy (QM004) has been created to ensure MLC has robust and client-centred consent processes and to ensure that all company employees involved in the consent process understand the procedures and protocols for obtaining valid consent, and to:

- Ensure that no assessment, intervention and/or care are carried out without the client and/or their representative's acceptance.
- Specify the essentials for valid consent and minimum requirements for obtaining and documenting valid consent.
- Support decision making and alternative arrangements to respect and support client's where consent is not given, or where it is difficult to ascertain client choices or confirm client consent.
- Enhance the continuity of service provision and improve service provision outcomes.
- Diminish the risk of conflicting understanding between clients and/or their representatives, and company employees with respect to the content of the written informed consent.
- Support client's rights and responsibilities.
- Address all other forms of consent and related documentation applicable to the services provided by MLC.

20.3 The policy includes considerations of situations where the client is not capable of giving consent themselves.

20.4 The policy provides staff with requirements and procedural guidelines in accordance with current legislations to maintain a consent process that is functional and sustainable.

21. Safeguarding Children Policy

21.1 The Company is committed to ensuring a healthy and safe environment for its employees and clients, therefore the Safeguarding Children Policy (QM005) has been created to identify the policies and procedures set in place to ensure the safety of all children during the course of services provided by the Center.

21.2 MLC has a moral and legal obligation to ensure that, when given responsibility for children and young people, staff provides them with the highest possible

standards of care. Children and young people are vulnerable to abuse, and the purpose of this policy is to ensure the actions of any adult in the context of the work or services carried out by the Center are transparent and safeguard and promote the welfare of all young people.

- 21.3 MLC is committed to ensuring that all staff are trained, educated, and understand their responsibilities in safeguarding children from harm and abuse. This includes following procedures to protect children at all times and reporting any concerns about their welfare to the appropriate authorities.
- 21.4 The aim of the Safeguarding Children Policy is to promote good practice, provide children and young people with appropriate safety and protection while in the care of the Center and its staff, and to enable staff to make informed decisions and take appropriate action to specific child protection issues.
- 21.5 The implementation of the Safeguarding Children Policy and its procedures should be regularly monitored and reviewed. Staff should regularly report progress, challenges, difficulties, achievements, gaps and areas where changes are required to ensure the effectiveness of the policy.

22. Managing Ethical Dilemmas

- 22.1 MLC management shall promote a culture of ethical practice and shall provide guidance to staff to be able to recognize ethical dilemmas. Clients, family members and staff shall be encouraged to freely report ethical dilemmas to the management. All staff are empowered to address unethical behaviors in the work place and make the right decisions. Ethical Dilemmas may be reported verbally or through email.
- 22.2 The CEO/MD, with the support of relevant HOD's (as applicable), shall review all ethical dilemmas and take appropriate actions within defined timeframes. Furthermore, management shall develop corrective actions to prevent future re-occurrence and improve staff awareness to deal with such ethical dilemmas.
- 22.3 The CEO/MD, with the support of relevant HOD's (as applicable), shall ensure that ethical decision-making is based on the following guiding principles, that includes but not limited to, autonomy (independence, freedom to determine one's own actions, behavior); veracity (truthfulness); non-maleficence (doing no harm); beneficence (doing good, kindness); confidentiality; justice; and role-fidelity (building trusting relationship, being loyal and trustworthy).
- 22.4 Examples of Ethical Dilemmas include, but are not limited to, issues concerning confidentiality, privacy, autonomy, respect for human dignity, clients' rights, scope of practice, abuse and neglect, inadequate staffing, delays in service provision due to shortage of staff, negligence, conflicts with caregivers, cost containment issues, and other issues perceived as ethical problems.

22.5 All employees at MLC are responsible to recognize ethical dilemmas, and if faced with an ethical dilemma, follow the below 'YODA' process to receive and resolve the ethical dilemma in a timely manner.

22.6 MLC has adopted the Principle Based Framework for Ethical Decision Making: YODA (*Adapted from CHAC Health Ethics Guide & Abdool et al. 2004*).

Y – YOU

- You are a moral agent, and ethical reflection is your responsibility

O – OBSERVE

- Identify the problem
- Acknowledge feelings
- Gather the facts

D – DELIBERATE

- Consider alternatives
- Examine values
- Examine and evaluate alternatives

A – ACT

- Articulate the decision
- Implement the plan
- Concluding review

22.7 If faced with an ethical dilemma, staff should utilize and complete an Ethical Decision Making Worksheet (QM017), which allows for information and data recording and provides further guidance following the YODA framework. If further assistance with analyzing and effectively addressing any ethical dilemma is required, staff can approach CEO/MD or HOD's as required.

22.8 Completed Ethical Decision Making Worksheets should be submitted to the CEO/MD and applicable HOD (as relevant).

22.9 MLC shall maintain all necessary documentation including an Ethical Dilemmas Log Sheet (QM018) to record all dilemmas, within an Ethical Dilemmas folder held with QCBD Manager.

23. Confidentiality Policy

23.1 Unless required by law, no information that discloses a Child or the Parents/Guardians identity will be released to anyone outside of the Child's "circle of care" without written consent from the Parents. All information shared and discussed with Center Personnel is considered strictly private. However, there are few circumstances in which Center Personnel may disclose information without consent, in the best interest of the child/individuals/family at stake. The following are exceptions shall apply:

- If there is clear evidence of serious and imminent harm to oneself or to others.
- If there is reason to suspect abuse (sexual, emotional, or physical) or neglect of a child or vulnerable adult.
- If there is a report of misconduct, particularly of a sexual nature, by another health professional.
- If the confidential records are deemed relevant and subpoenaed by a court of law or regulating body of health professionals.

23.2 All staff has the responsibility to ensure client confidentiality is maintained at all times in line with all associated operational and departmental policies.

24. Client Relations Policy / SOP

24.1 The Client Relations Policy (CR007) and Client Relations Standard Operating Procedures (CR031) for MLC has been written to clarify and detail how employees shall approach and manage customer care and customer service related situations. The objectives of the Client Relations Policy are to:

- Define the essentials of providing the best customer service and care to MLC clients, and to exceed the expectations of our clients;
- To inform and acquaint employees with our customer care and customer services policies and procedures;
- Highlights the roles and responsibilities of staff in relation to meeting customer care and customer service objectives;
- Provide essential information on the protocols and processes for staff.

24.2 Client Relations staff receive extensive training on the Client Relations procedures for the Center.

25. Document Control System

25.1 MLC is committed to ensuring the highest standards of quality across all departments, and has implemented standard practices and guidelines for the control and management of company policies, forms and documents. The Company has implemented a detailed Document Control Policy (QM014) which defines the process for the preparation, review, and approval of corporate policies associated forms and documents, and the persons authorized by the Company for approving the policies.

25.2 A list of all policies and forms utilized by the company is held and controlled by the QCBD Manager using the Controlled Documents Register (QM001). The QCBD Manager assigns a controlled document code number to any policy or form adopted by the company.

25.3 Company Policies

- 25.3.1 All policies must be reviewed at least every two years (unless otherwise specified). Company Plans (Staffing Plans, Staff Learning & Development Plan, Quality Improvement Plan, Risk Management Plan and Health Safety Environment (HSE) Plan) may reviewed every year and its progress will be monitored. This will be controlled by the policy review dates, controlled document code numbers, revision numbers and appropriate signatures. Obsolete policies will be removed from circulation and saved in an archived folder on the company server in the Controlled Documents folder.
- 25.3.2 All policies must be approved by the CEO/MD prior to distribution.
- 25.3.3 All Operational/Departmental/Administrative policies must be reviewed by the CEO/MD and applicable HOD (if and where applicable) before approval is issued.
- 25.3.4 All policies must be signed and stamped prior to implementation, as per the procedure set out in this document.
- 25.3.5 Three, signed and stamped hard copies shall be maintained and available. One copy shall be maintained in the Human Resources (HR) Department at CEIMC, one in Manager's Office at CLEMC, and one copy in the respective department for which the policy references (where and if applicable).
- 25.3.6 Electronic copies shall be maintained on the Child-Pro CRM system, as well as on the company server in the Controlled Documents folder.
- 25.3.7 Below please find the list of current active policies maintained by the Company:

No.	Policy Name	Controlled Document Code Number
1	Behavioral Intervention Department Policy	ABA001
2	Accounting Policy & Procedures	ACT001
3	Client Relations Policy	CR007
4	Client Concerns & Complaints Policy	CR008
5	Client Records Policy	CR023
6	Client Relations Standard Operating Procedures	CR031
7	Operational Policy	CG001
8	Corporate Governance Policy	CG002
9	Delegation of Authority	CG003
10	Strategic Objectives Plan	CG004
11	Employee Internal Guidelines	HR028
12	HR Standard Operating Procedures	HR029
13	Recruitment & Talent Management Policy	HR031
14	Performance Management & Professional Development Policy	HR032

15	Employee Health & Wellness Policy	HR033
16	Health, Safety & Environment Policy	HSE001
17	Infection Control Policy	HSE002
18	Environmental Cleaning & Waste Management Policy	HSE003
19	Incident Reporting Policy	HSE020
20	Marketing, PR Policy & Social Media Policy	MKT001
21	Corporate Social Responsibility (CSR) Policy	MKT002
22	Quality Management Policy	QM002
23	Risk Management Policy & Plan	QM003
24	Informed Consent Policy	QM004
25	Safeguarding Children Policy	QM005
26	Document Control Policy	QM014
27	Quality Improvement Plan	QM015
28	Social Care Governance Policy	QM016
29	Maharat Learning Academy Policy	MLA001
30	Information Technology Policy	IT001

26. Finance/Accounting Systems

26.1 Accounting Policy & Procedures

26.1.1 MLC is committed to promoting fair, equitable and ethical financial and accounting practices, and has implemented stringent policies, procedures and guidelines for the financial control and accounting of its business. The Accounting Policy and Procedures (ACT001) has been defined to regulate a consistent and effective approach to financial and accounting practices and should be adhered to precisely to ensure company finances and assets are safeguarded and maintained appropriately.

26.2 Corporate Discount Policy

26.2.1 MLC is committed to maintaining fair and equitable practices for all clients and services. As such, the company has implemented stringent guidelines for the control and application of discounts on its services within a Corporate Discount Policy (contained in the Accounting Policy & Procedures) in order to define and regulate a consistent, effective approach to applying discounts and to ensure that discounts are only utilized when warranted and authorized.

27. Information Technology (IT)

27.1 MLC's Information Technology (IT) Policy (IT001) describes the Company's policies, procedures, and guidelines for the selection and use of IT within the company.

27.2 The IT Policy ensures that all MLC staff are aware of obligations in relation to IT equipment and software selection, IT use, and IT safety when utilizing information technology within the Company, and is applicable to all MLC staff.

28. Marketing, PR and CSR

28.1 Marketing & Public Relations

28.1.1 MLC are committed to company excellence and the promotion of a positive, corporate public image, and have created a Marketing, Public Relations (PR) & Social Media Policy (MKT001) to ensure appropriate management and promotion of the MLC brand.

28.2.2 The leadership of MLC implements integrated marketing communications strategies designed to advance our image and standing amongst its clients, staff, and the community at large. This includes building and protecting our brand position and identity, providing consultation and expertise on marketing efforts undertaken by staff and coordinating our marketing and advertising, media, publications, social media, printed materials, internal and external communication, events, conferences and CSR activities organized by MLC or its partners.

28.2 Corporate Social Responsibility (CSR)

28.2.1 MLC seeks to be a good corporate citizen in everything that it does as an company, and has therefore determined to bring together our existing operating principles into one framework policy under the heading of Corporate Social Responsibility (CSR) (MKT002).

28.2.2 The principles encompassed in the CSR Policy cover all areas of the company's operations and have been developed and continue to be reviewed against, and updated by, reference to relevant codes of corporate governance and international standards including the United Nations (UN) Universal Declaration of Human Rights, and the International Labor Company (ILO) Declaration on Fundamental Principles and Rights at Work.

28.2.3 MLC supports the principles set out in those codes and standards and the aim of the CSR Policy is to translate that support into a set of guidelines and standards that set a common approach to CSR for MLC and provide practical guidance for all employees.

29. Contracted Services

29.1 From time to time, the Company may have the need to procure services through contractual arrangements. Such services, if and when required, may include Consultants, Professionals and other Specialists, under the following arrangements:

- Attorneys, Management, Financial, or Marketing Consultants shall be hired on an as needed basis.
- Auditing firms, on a part-time contractual basis for supervising the Company's Accounting Department.

- The Company may invite Specialist consultants by arranging a visit visa. Such consultants will have a pre-arranged contract with the Company and shall be paid either a percentage of fees generated from the sale of such consultant's services or a fixed amount as agreed in the contract stipulating the reimbursement of airfare and hotel accommodation.

29.2 In addition to the above service arrangements, the Company contracts with the following agencies:

- Fire Prevention/Maintenance Company, hired on a contractual basis.
- Pest Control/Prevention Company, hired on a contractual basis.
- Offsite Storage Facilities Company, hired on a contractual basis.

29.3 The Company's leadership, shall have the authority to enter into contractual agreements on behalf of the Company within the limitations defined in the Delegation of Authority, in order to ensure all contracted services are in alignment with local regulatory requirements.

30. Related Documents / References

ABA001	Behavioral Intervention Department Policy
ACT001	Accounting Policy & Procedures
CR004	MLC Parent Handbook
CR007	Client Relations Policy
CR008	Client Concerns & Complaints Policy
CR023	Client Records Policy
CR031	Client Relations Standard Operating Procedures
CG001	Operational Policy
CG002	Corporate Governance Policy
CG003	Delegation of Authority
CG004	Strategic Objectives Plan
HR028	Employee Internal Guidelines
HR029	HR Standard Operating Procedures
HR031	Recruitment & Talent Management Policy
HR032	Performance Management & Professional Development Policy
HR033	Employee Health & Wellness Policy
HSE001	Health, Safety & Environment Policy
HSE002	Infection Control Policy
HSE003	Environmental Cleaning & Waste Management Policy
HSE020	Incident Reporting Policy
MKT001	Marketing, PR Policy & Social Media Policy
MKT002	Corporate Social Responsibility (CSR) Policy
QM001	Controlled Documents Register
QM002	Quality Management Policy
QM003	Risk Management Policy & Plan
QM004	Informed Consent Policy
QM005	Safeguarding Children Policy

QM014	Document Control Policy
QM015	Quality Improvement Plan
QM016	Social Care Governance Policy
QM017	Ethical Decision Making Worksheet
QM018	Ethical Dilemmas Log Sheet
MLA001	Maharat Learning Academy Policy
IT001	Information Technology Policy

31. Amendments

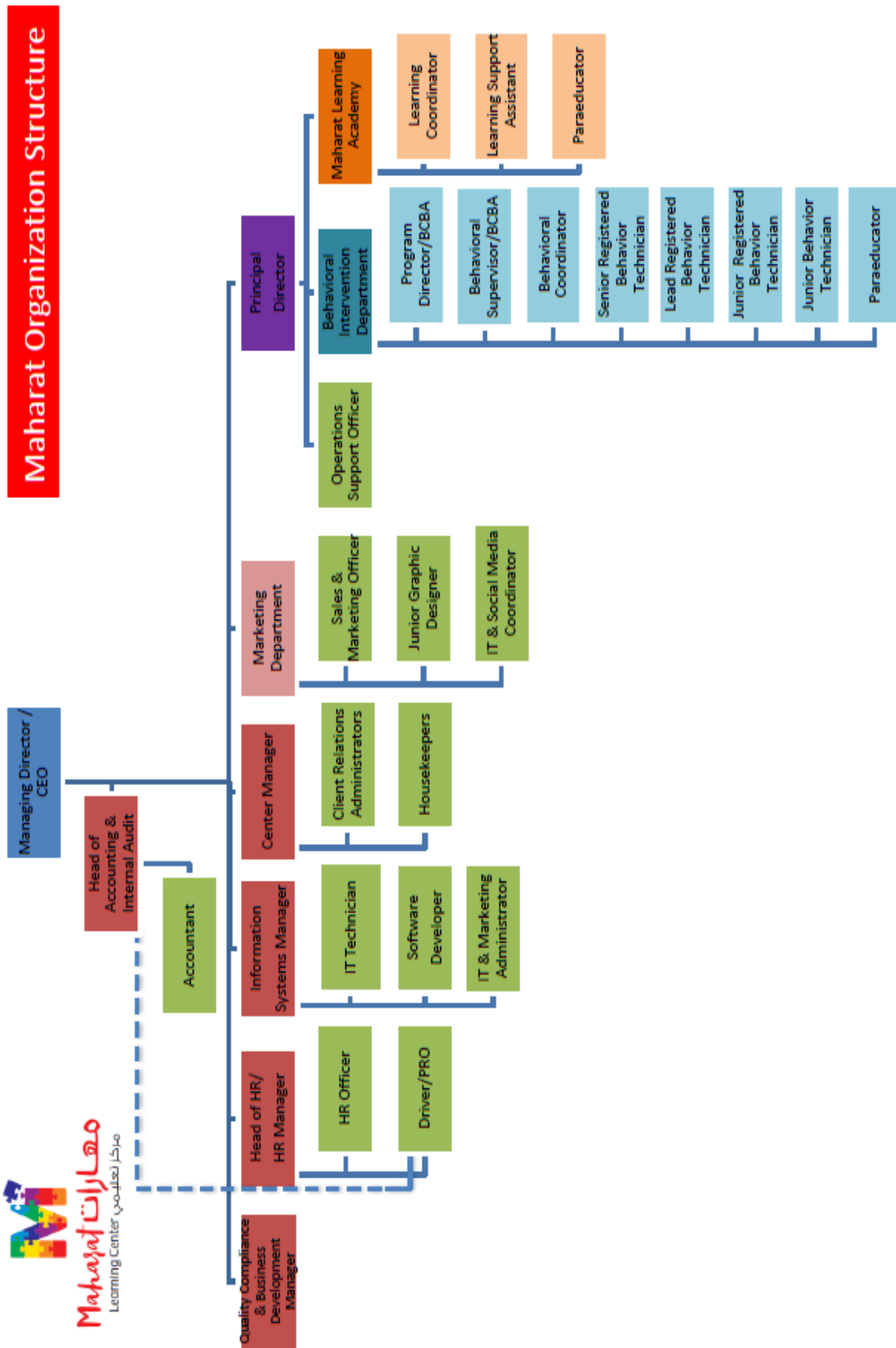
31.1 This policy will be reviewed every two years at a minimum, or as required.

32. Attachments

32.1 Attachment A: Organization Structure

32.2 Attachment B: Policy Authorization Page

Attachment A – Organization Structure



Attachment B - Policy Authorization Page

Creation Date: January 2017		Created By: Dr. Hibah Shata, MD/CEO	
Revision Date	Edited By	Version Number	Next Review Date
January 2017	Hibah Shata Karen Evans	V.1	January 2019
October 2018	Hibah Shata Karen Evans Lavita Lobo	V.2	October 2020

Approval Signatory:

Name: Dr. Hibah Shata

Designation/Title: Chief Executive Officer / Managing Director

Date: 01 October 2018

Signature: _____

Company Stamp: