

# Group Policy: Health & Safety Governance and Oversight August 2025



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## Section 1: Introduction

### Purpose

The purpose of this document is to outline the group-wide policy for Health & Safety Governance and Oversight within Cognita.

### Definition of Health & Safety

Health and safety refers to the way that we ensure our schools and offices are safe places to learn and work. This involves ensuring that we have the right culture, process and systems. Above all, these are intended to be proactive in order to avoid accident or injury.

### Health & Safety principles

Principles of health and safety are universal and apply to all Cognita schools. Whilst the laws and regulations relating to the Health & Safety will differ in each country, there is an expectation that every Cognita school will intentionally commit to applying the same core principles.

1. Encourage a positive health and safety culture that is driven by strong and active leadership.
2. Embrace open reporting for health and safety concerns to support shared learning and demonstrate listening.
3. Provide effective staff training aimed at enhancing understanding, to empower staff with key roles and responsibilities.
4. Implement active and reactive monitoring to enable the evaluation of effectiveness of health and safety management systems.
5. Focus upon meaningful health and safety procedures and practices rather than box ticking exercises.
6. Raise awareness to ensure everyone has responsibility for ensuring good health and safety practice.
7. Maintain visible platforms to ensure contractors and visitors are aware of expectations in keeping our schools safe.

**The Cognita approach to Health & Safety**

As a diverse global school system, we adopt an approach to Health & Safety that makes clear the accountabilities and responsibilities of a range of people, with the view that it takes a coherent system to ensure effective Health & Safety.

There are three pillars to our Health & Safety approach in Cognita.

School ↓	Region ↓	Group ↓
This is the work that happens every day in every school to create safe places and to implement effective Health & Safety processes.	This is the work that takes place in each Cognita region to hold school leaders to account, and to provide support and challenge to drive the highest quality and to share effective practice in relation to Health & Safety.	This is the work that takes place across Cognita to provide governance through independent reviews and to hold regional teams to account in relation to Health & Safety.

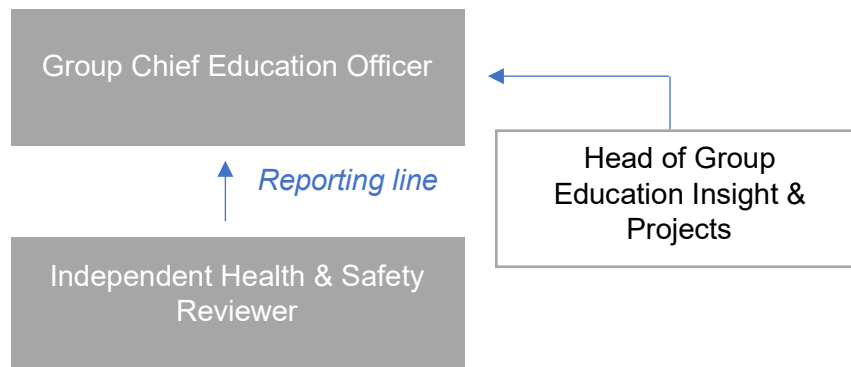
## Section 2: Accountability and responsibility

The main roles associated with these three pillars are summarised below with further detail throughout this document.

School	Region	Group
<b>Head of School</b> (Accountability Function) <ul style="list-style-type: none"> <li>Accountable for Health &amp; Safety provision and outcomes within their school.</li> <li>Appoints and manages the Health &amp; Safety Co-ordinator (or equivalent).</li> <li>Ensures that the school has appropriate resources to execute Health &amp; Safety responsibilities.</li> <li>Ensures that there is a strong Health &amp; Safety culture within their school.</li> </ul>	<b>Regional CEO</b> (Accountability Function) <ul style="list-style-type: none"> <li>Accountability for Health &amp; Safety standards in the region, including holding members of their team to account for the implementation of this policy.</li> <li>Chairs three Regional Assurance Board meetings annually.</li> <li>Holds the regional team to account for their Health &amp; Safety responsibilities.</li> <li>Approves Regional Annual Assurance Report.</li> <li>Ensures that the region has appropriate resources to execute Health &amp; Safety responsibilities.</li> </ul>	<b>Group Chief Education Officer</b> (Governance Function) <ul style="list-style-type: none"> <li>Sets 'Group Policy: Health &amp; Safety Governance and Oversight'.</li> <li>Chairs Annual Assurance Meeting for each region.</li> <li>Manages the Independent health &amp; Safety Review process.</li> </ul>
<b>Health &amp; Safety Coordinator</b> (Accountability Function) For detail regarding the responsibilities of the Health & Safety coordinator, please refer to the relevant Regional Health & Safety Policy.	<b>Regional Health &amp; Safety Lead</b> (Advisory Function) <ul style="list-style-type: none"> <li>Responsible for promoting the highest standards of Health &amp; Safety within a region.</li> <li>Advises, supports and challenges schools with Health &amp; Safety.</li> <li>Creates regional policy documents.</li> <li>Uses data to intervene, plan training and identify risks.</li> <li>Writes the Annual Assurance Report for Health &amp; Safety.</li> <li>Tracks closure of review recommendations.</li> </ul>	<b>Head of Group Education Insight &amp; Projects</b> (Governance Function) <ul style="list-style-type: none"> <li>Maintains oversight of Health &amp; Safety assurance systems and processes.</li> <li>Determines Annual review schedule, consulting with key stakeholders.</li> <li>Acts as group-wide point of contact for Health &amp; Safety Review issues.</li> </ul>
		<b>Independent Safeguarding Reviewer</b> (Governance Function: Independent Expert) <ul style="list-style-type: none"> <li>Completes Independent Health &amp; Safety Reviews.</li> <li>Provides constructive feedback to school and regional teams to quality assure and build capacity.</li> </ul>

## Accountability and responsibilities of the Group Team

### Group Health & Safety Governance and Oversight



#### Group Chief Education Officer

The Group Chief Education Officer is responsible for setting and providing oversight of the *Group Policy: Health & Safety Governance and Oversight*.

The key responsibilities of the Group Chief Education Officer are to:

- Determine the policy for Health & Safety Governance and Oversight across the Cognita Group;
- Inform regional executive teams of Health & Safety oversight expectations, according to the agreed policy;
- Manage agreed Health & Safety governance processes including regional Annual Reports and chairing of Annual Assurance Meetings;
- Manage processes relating to the Independent Health & Safety Review Team, including recruiting independent reviewers, establishment of the review framework and publication of the annual Health & Safety review schedule;
- Take responsibility for any Health & Safety recommendations made by the Independent Health & Safety Review Team that impact the entire Cognita Group; and
- Respond to any Health & Safety matters escalated to the Group CEO, relating to either a SIRC or the findings from an independent Health & Safety review.

The Group Chief Education Officer is responsible for the recruitment and management of any additional staff members that are required to support with processes related to Health & Safety governance across the Cognita Group. This may include but is not limited to:

- Head of Group Education Insight & Projects
- Education Team Administrator

#### Head of Group Education Insight & Projects

The key responsibilities of the Head of Group Education Insight & Projects are to:

- Maintain oversight and effective implementation of Health & Safety assurance systems and processes on behalf of the Group Chief Education Officer;
- Implement the Annual Health & Safety Review schedule, consulting with appropriate stakeholders, with a drive for continuous improvement;

- Provide support to the Independent Health & Safety Reviewer and regional teams regarding Health & Safety matters; and
- Provide support to the Group Chief Education Officer with processes related to Health & Safety governance.

### **Role of the Independent Health & Safety Review Team**

The proprietor/owner exercises governance oversight through the deployment of an external Independent Health & Safety Reviewer at all Cognita schools and offices. Reviewers are commissioned to undertake this work and may not have any other role in a Cognita school or within the regional team. The team of active Health & Safety reviewers commissioned by Cognita forms the Independent Health & Safety Review Team.

### **Independent Health & Safety Review Team**

The Independent Health & Safety Review Team are responsible for reviewing Health & Safety arrangements as outlined in published policies and documents. Independent Reviews are conducted across all Cognita sites to:

- Review Health & Safety practice, including in relation to relevant statutory and/or regulatory requirements;
- Exercise effective governance oversight in relation to Health & Safety;
- Ensure compliance with relevant policies;
- Identify and share effective practice; and
- Identify points for development.

The key responsibilities of the Independent Health & Safety Review Team are to:

- Undertake reviews and monitoring visits in line with an agreed deployment schedule (see Appendix 5 for further information regarding the 'tariff days' allocated for each review);
- Review practice against the agreed framework in a professional and consultative manner, taking account of local context;
- Maintain strongly professional relationships which are based on integrity in all work;
- Provide verbal feedback at the end of each on-site review;
- Write evidence-based reports which are of a high standard;
- Ensure that reviews are conducted in an open and transparent manner;
- Identify effective practice;
- Escalate risks and/or concerns, providing a written account of all relevant information and evidence; and
- Circulate reports directly to key stakeholders\*, including the Head of School and the Regional Team, in a timely manner.

#### **\*Distribution List: Standard**

The distribution list for Independent Health & Safety Review reports should be as follows:

- Head of School
- Regional Health & Safety Lead
- Regional Executive Team members, including: Regional CEO, Regional Director of Operations (if relevant), Director of Education (if applicable), General/Country Manager (if applicable);

- Head of Group Education Insight & Projects (cc'd for the purpose of system oversight); and
- Independent Health & Safety Review Team Leader (cc'd for the purpose of system oversight).

**\*Distribution List: Escalation Required**

In certain circumstances, Safeguarding Review Reports will require escalation to the:

- Group Chief Education Officer; and
- Group General Counsel

in addition to the standard distribution list (shown above).

Independent Health & Safety Review reports should be escalated (as above) in the following circumstances:

- A child (or children) is deemed unsafe due to the care provided at a Cognita site;
- A concern about organisation-wide Health & Safety matters is referenced;
- A concern relating to a fatality is referenced;
- A matter relating to an employee of Cognita has been referred to any local authority or regulatory body within a country; or
- There is a significant reputational risk to Cognita

**Independent Health & Safety Review Team Leader**

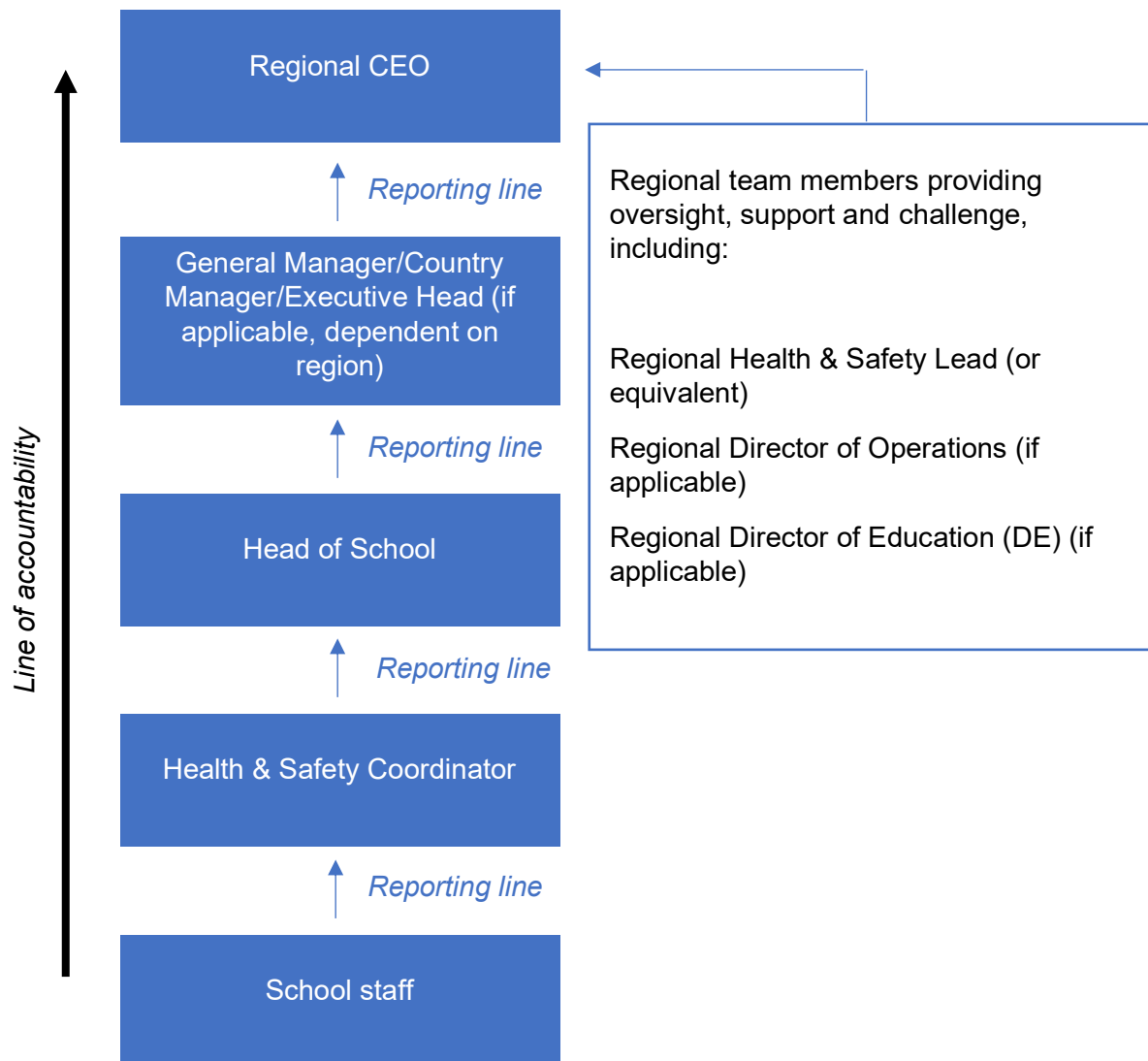
The Independent Health & Safety Review Team is chaired by the Independent Health & Safety Review Team Leader who reports to the Group Chief Education Officer.

Their key responsibilities are to:

- Act as the independent designated Health & Safety consultant at group level for matters across Cognita;
- Co-ordinate regular meetings of the Independent Health & Safety Review Team to compare notes on progress with the regional school visits;
- Liaise with central office team in relation to any administrative or feedback points from the school visits;
- Arrange for in-team moderation of sampled reports at least three times each year;
- Act as a sounding board for other reviewers whilst completing school visits and reports;
- Support other reviewers to ensure that review reports are distributed in a timely manner;
- Chair bi-annual shared learning meetings, providing Health & Safety expertise to regional team members;
- Co-ordinate the annual update of review rubrics and reporting templates for each region; and
- Provide feedback on the annual Health & Safety review schedule, allocations and timings.

## Accountability and Responsibilities of the Regional Team

### Regional Health & Safety Execution\*



The Regional Health & Safety Execution visual above presents an overview of how Health & Safety oversight works across the Cognita Group. As each regional team has a distinctive structure, a specific Health & Safety execution chart for each region can be found in the Appendices.

## Regional CEO

The Regional CEO is accountable for Health & Safety standards in their region. The Regional CEO is responsible for holding members of their team to account for the implementation of this policy.

The key responsibilities of the Regional CEO are to:

- Ensure that the region has appropriate resource, systems and guidance to execute Health & Safety responsibilities;
- Ensure adequate arrangements to oversee the effective implementation of policies and practices across all Cognita schools, sites with students and offices;
- Maintain oversight and hold the regional team and schools to account for their Health & Safety responsibilities via line management and the operation of three Regional Assurance Board meetings during the academic year;
- Ensure arrangements are in place to hold Heads of School to account through line management and, if required, disciplinary measures for compliance with the Health & Safety Policy and related requirements;
- Ensure that Health & Safety related risks within the region are effectively captured on the Regional Risk Register; and
- Ensure that arrangements are in place to address recommendations from Health & Safety reviews, including recommendations for the regional team.

The additional accountabilities of the Regional CEO, with optional delegation of responsibility to regional team members, are to:

- Support and monitor improvements in Health & Safety such as outcomes arising from independent reviews in Health & Safety matters and school inspections and/or accreditation;
- Support and monitor compliance with internal Health & Safety policies and practices, by reviewing and responding to publicised Health & Safety review reports for all regional schools and offices;
- Ensure that regional policies, guidance and templates are aligned with the *Group Policy: Health & Safety Governance and Oversight* and with relevant legislation and regulations;
- Ensure that, where required, external agents (with appropriate competency) have been commissioned to fulfil all regulatory Health & Safety related requirements;
- Oversee the preparation and submission of an Annual Assurance Report and provide an executive summary during the Annual Assurance Meeting;
- Ensure that a set of Key Performance Indicators has been devised for all schools and offices within the region, taking into account local regulatory requirements and regional management structures;
- Ensure effective oversight of the integration of Cognita Health & Safety policies and practices within newly acquired schools, taking into account the local context;
- Share effective practice and lessons learned amongst schools (via Regional Assurance Board meetings); and
- Ensure early identification of key risks with timely and appropriate control measures implemented (via Regional Assurance Board meetings).

N.B. General Managers, Country Managers or Executive Heads may be expected to support with the responsibilities detailed above for the schools that they oversee. For further information about the role of a General Manager, Country Manager or Executive Head within Cognita, please refer to local documentation issued by the regional team.

The Regional CEO is responsible for the recruitment and management of any additional staff members (with appropriate competency) that are required to support with processes related to Health & Safety oversight within their region. This may include but is not limited to:

- Regional Health & Safety Lead (or equivalent)

### **Regional Health & Safety Lead**

The Regional Health & Safety Lead (or equivalent) is responsible for promoting the highest standard of Health & Safety within a region, advising and supporting schools and office-based teams to adopt a self-improving approach to Health & Safety practice. The key responsibilities (allowing for some region-specific variation) of the Regional Health & Safety Lead (or equivalent) are to:

- Draft policies, procedures and toolkits that are aligned with the Group Policy: Health & Safety Governance and Oversight and with relevant legislation and regulations, giving due consideration to local context;
- Maintain an oversight of Health & Safety standards within a region, celebrating and sharing effective practice, and challenging under performance;
- Build capacity through designing and executing systemic approaches to Health & Safety leadership;
- Support and advise the school Health & Safety Coordinators and leadership teams, including with referrals to external agencies, risk assessments and action planning;
- Manage the Year B Self-Evaluation and Validation process;
- Identify training needs across all schools and offices and work to source, write or deliver appropriate training that aligns with this need;
- Prepare and present reports for a range of audiences;
- Track the closure of actions/recommendations from Independent Health & Safety Reviews, including recommendations for the regional team; and
- Support, as requested by the Regional CEO, with the completion of the Annual Assurance Report and preparation for the Annual Assurance Meeting.

\*For further information regarding the responsibilities of the Regional Health & Safety Lead (or equivalent) please refer to the Regional Health & Safety Policy.

## **Accountability and Responsibilities of the School Team**

### **Head of School**

The Head of School, at each Cognita school, is accountable for the standards of Health & Safety at their school.

The key responsibilities of the Head of School are to:

- Ensure that the school policy matches regional and statutory/regulatory guidance;
- Ensure that staff are trained and appropriate resources are allocated for the execution of Health & Safety responsibilities;
- Ensure that the content of the school policy is lived through the implementation of a culture of safety, supported by known and understood systems and processes;

- Ensure that a strong Health & Safety culture and effective Health & Safety practice is implemented within their school;
- Ensure accurate and timely reporting to the regional team and external agencies (if applicable);
- Recruit and manage the school Health & Safety Coordinator\* (or equivalent), ensuring that at least one Health & Safety Coordinator is employed by the school at all times; and
- Own any improvements or recommendations detailed within their external Health & Safety review report.

### **School Health & Safety Co-ordinator**

The role of the Health & Safety coordinator is outlined in the Regional Health & Safety Policy.

### Section 3: Health & Safety meetings

The visual below illustrates the three types of meetings that occur in relation to Health & Safety Governance and Oversight across Cognita. This does not include meetings occurring within schools or between schools and their regional team.

	<b>Regional Assurance Board</b>	<b>Annual Assurance Meeting</b>	<b>Health &amp; Safety Shared Learning Meetings</b>
<b>Purpose</b>	In-region Accountability	Governance of the region	Shared learning from independent reviewer
<b>Chair</b>	Regional Chief Executive Officer	Group Chief Education Officer	Lead Independent Reviewer
<b>Cadence</b>	Termly: 3 meetings per year	Annually: 1 meeting per year	2 meetings per year
<b>Further detail</b>	In this document	In this document	In this document

In addition to the above, the Regional Health & Safety Leads meet four times each year; known as the 'Global Health & Safety Network'. The purpose of this is to facilitate inter-region sharing of effective practice. The detail of this network is not included here as it is not 'governance'. Further detail can be found in the Group Education Handbook.

## **Regional Assurance Board Meetings**

Each Cognita regional team is expected to schedule either:

Three Regional Assurance Board Meetings each year, covering Health & Safety and Safeguarding within one meeting.

or

Three Regional Health & Safety Assurance Board Meetings and three separate Regional Safeguarding Assurance Board Meetings each year.

### Purpose

- Oversee Health & Safety/Safeguarding arrangements within a region, including the effective implementation of policies.
- Ensure early identification of key risks with timely and appropriate control measures implemented.
- Share effective practice and lessons learned amongst schools.
- Monitor improvements in Health & Safety/Safeguarding such as outcomes arising from specialist external reviews in Health & Safety/Safeguarding matters and school inspections.
- Hold schools and regional team to account for action and impact in relation to Health & Safety/Safeguarding.

### Attendance

Given the differing regional structures, the responsibility for attendance rests with the Regional CEO. However, those detailed below shall be the mandatory representatives for a Regional Assurance Board meeting (if covering both Health & Safety and Safeguarding simultaneously). Note that regional job titles may vary.

- Regional CEO
- Regional Safeguarding Lead (or equivalent)
- Regional Health & Safety Lead (or equivalent)
- Regional Chief Operations Officer (or equivalent)
- Regional Director of Education
- Regional HR Director (must be present for discussion on safeguarding including safer recruitment)

### Chairing

The meeting shall be chaired by the Regional CEO.

### Frequency

Meetings shall be conducted a minimum of three times per year (once per term). The Regional CEO can call an extraordinary meeting at any time.

### Record of meeting

A record shall be kept of each meeting, outlining discussion points, actions and decision taken.

### Reports

All written reporting documentation for the meeting shall be circulated at least five working days in advance of the meeting. All attendees should be fully prepared for the meeting which includes having read the relevant pre-read documents.

The Chair of the meeting is responsible for deciding the documentation that is required for submission for this meeting.

### Agenda

The Regional CEO is responsible for determining the agenda for the Regional Assurance Board meetings.

The agenda should include:

1. Progress against agreed regional priorities
2. Outcomes from independent reviews and progress vs previous recommendations
3. Integration of newly acquired schools
4. Regional Risk register
5. Regulatory changes
6. Review of relevant data, including reference to the Intelligent Accountability Dashboard

## **Annual Assurance (Governance) Meeting**

### Purpose

- Facilitate group oversight of Safeguarding and Health & Safety arrangements within each Cognita region, from the perspective of the proprietor.
- Receive Annual Assurance Report on the standard and effectiveness of Safeguarding and Health & Safety management in a region.
- Hold the regional team to account for action and impact in relation to Safeguarding and Health & Safety.

### Attendance

Those detailed below shall be the key representatives at this meeting. Note that regional job titles may vary. The Regional CEO is responsible for ensuring correct regional attendance.

#### Regional:

- Regional CEO\*
- Regional Health & Safety Lead (or equivalent)
- Regional Safeguarding Lead (or equivalent)
- Regional Director of Education
- Regional HR Director
- Regional Legal Counsel

\*Where it is necessary for the annual meeting to be split into multiple parts (due to differing managing structures), the Regional CEO is required to attend all parts of the meeting.

#### Independent:

- Independent Safeguarding and Health & Safety Review Team Leader

#### Group:

- Group Chief Education Officer
- Head of Group Education Insight & Projects
- Group General Counsel (by invitation of Group Chief Education Officer, if there is perceived need)
- Other attendees as deemed appropriate by the Group Chief Education Officer

### Chairing

The meeting shall be chaired by the Group Chief Education Officer

### Frequency

Meetings shall be conducted once per annum. The Group Chief Education Officer can call an extraordinary meeting at any time.

### Reporting documentation

Each region within the Cognita Group is expected to submit an Annual Assurance Report to the Group Chief Education Officer in preparation for the Annual Governance Meeting, using the group-wide standard template.

All written reporting documentation for the meeting shall be circulated at least five working days in advance of the meeting. All attendees should be fully prepared for the meeting which includes having read the relevant pre-read documents.

#### Reporting to the Cognita Board

It is the responsibility of the Chair of this meeting to report to the Cognita shareholder board. A board report will be produced by the Group Chief Education Officer, following the Annual Governance Meetings.

#### Standard Agenda

1. Introductions and apologies for absence
2. Discussion and questions regarding the Annual Assurance Report
3. Any additional insight from members of the regional team
4. Any other business

## Shared Learning Meetings

### Purpose

To discuss shared learning from the Independent Health & Safety Review process and themes arising from group-wide oversight

### Chairing

The meeting shall be chaired by the Lead Independent Health & Safety Reviewer.

### Frequency

Twice during the year

### Duration

90 mins

### People

Those detailed below shall be the mandatory representatives for the bi-annual Shared Learning meetings:

#### Region:

- Regional Health & Safety Lead/s from all regions
- Translator if required

#### Independent:

- Independent Health & Safety Review Team Leader
- Independent Health & Safety Reviewer (for calibration between Safeguarding and Health & Safety)

### Standard Agenda

1. Apologies for absence

#### *Items from Lead Independent Reviewer*

2. Themes from independent reviews
3. Items related to independent review process
4. Learning related to health & safety practice
5. Regulation, legislation or guidance related to health & safety

#### *Items from Group Team*

6. Group-level learning from SIRFs (if relevant)
7. Group-level themes (if relevant)
8. Any other business

## Section 4: Independent Health & Safety Review Process

### Purpose

Independent Health & Safety Reviews are conducted across all Cognita sites to:

- Review Health & Safety practice, including in relation to relevant statutory and/or regulatory requirements;
- Exercise effective oversight in relation to Health & Safety;
- Ensure compliance with relevant policies;
- Identify and share effective practice; and
- Identify points for development.

The proprietor/owner exercises governance oversight through the deployment of an external Independent Reviewers at all Cognita sites. Reviewers are commissioned to undertake this work and may not have any other role in a Cognita school or within the regional team. The team of active Health & Safety reviewers commissioned by Cognita forms the Independent Health & Safety Review Team and is led by the Independent Health & Safety Review Team Leader.

### Methodology and evidence base

Each Health & Safety Review will take account of the following evidence base:

- Written Health & safety related policies;
- Written risk assessments;
- Minutes of meetings relating to Health & safety;
- Access platforms for Health & safety related policies and procedures;
- Planned preventative maintenance regimes;
- Training material and processes for workers with specific roles;
- Recording processes to support emergency planning and associated drills;
- Contractor assessment and oversight protocols;
- Discussions with workers representing the school for specialist areas; and
- Sampling during the school tour.

### Areas for evaluation

The following areas can be expected to be evaluated within each Independent Health & Safety Review:

Part 1: Organisation, arrangements, and communication

Part 2: Provision of information

Part 3: Consultation and communication with the workforce

Part 4: Premises and facilities related inspection

Part 5: Risk assessment

Part 6: Competence and training


Part 7: Management of contractors and visitors

Part 8: Emergency arrangements

Part 9: Security, access, and egress

Part 10: Welfare facilities and provisions

Each aspect will be evaluated using the following criteria:

	Health & Safety standards are not demonstrated to a suitable standard, and prompt action is required.
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	Health & Safety standards appear implemented, but requires further improvement to ensure compliance with local standards or best practice
	Findings demonstrates compliance with the Health & Safety standards either locally or considered best practice.

## Reporting

Each Independent Health & Safety Review will result in a written report which will show a RAG rating (as outlined above) in addition to:

- A statement relating to the school's compliance
- Paragraph summarising key findings
- Compliance actions for the school
- Developmental recommendations for the school
- Leading practice (optional section to be added if leading practice is observed at a school)
- Developmental recommendations for Cognita (to be recorded separately)

## Cadence

A full Independent Health & Safety Review takes place at each Cognita schools every two years. A Year A/Year B approach is employed. This approach intends to weave together a balance of external review with effective 'self' review. This helps to builds capacity within the Cognita group.

The following model is used:

Year A	Year B
In this year, the school will engage in an Independent Health & Safety Review with the Independent Health & Safety Reviewer.  [Further detail above]	In this year, the school will undertake a 'self-evaluation' using an agreed template.  The Independent Health & Safety Reviewer will meet with the school to discuss the self-evaluation.  The Independent Health & Safety Reviewer will validate the school's self-evaluation and complete a validation statement, using an agreed template.  Once complete, the self-evaluation form and validation statement* will be shared with the school and Regional Executive Team.

## Year B Self-Evaluation Process

### Purpose

The purpose of the Year B Self-evaluation process is to:

- Gain an outline of the progress made against compliance actions and developmental recommendations since the last Independent Health & Safety Review;
- Gain an outline of the school's focus points/priorities for Health & Safety during this academic year;
- Encourage effective self-evaluation in the year where there is not a full Independent Health & Safety Review; and
- Identify areas for development.

\*NB. The Year B Self-Evaluation Form and Validation Statement Template can be found on the Group Assurance Teams site.

### **Newly Acquired Sites**

For information regarding the incorporation of newly acquired sites into the Independent Review Process please refer to the *Group Policy: Integration of Newly Acquired Sites*.

### **Stages of the Independent Health & Safety Review Process**

For further information regarding the stages of the Independent Health & Safety Review process please refer to Appendix 7.

### **Follow up to the Health & Safety Review**

It is the responsibility of the Head of School to follow up on the recommendations from the Independent Health & Safety Review. The Regional Health & Safety Lead will also follow up to check progress and provide updates to the Regional Team at the Regional Assurance Board meetings.

### **Monitoring Visits**

In the rare situation where there are significant weaknesses, there may be a monitoring visit undertaken by the Independent Health & Safety Reviewer to check for progress against the recommendations.

### **Triggers for a Health & Safety Review (out of cycle)**

In addition to the routine review cycle, the following list outlines potential triggers for an additional or immediate Health & Safety Review:

- Any evidence-based concern (triggered by Regional Health & Safety Lead, Director of Education or CEO)
- Significant change of staff (especially Head of School or Business Manager)
- Specific accreditation/inspection outcome (if applicable)
- Serious parental complaint linked to Health & Safety
- Serious events over time deemed to be a serious Health & Safety risk

An additional review can be commissioned under any circumstances by the Group Chief Education Officer.

### **Escalations**

On rare occasions, there may be a need for a Health & Safety reviewer to escalate concerns outside of the routine reporting process. There are two types of escalations.

#### **Type 1 – Significant Concerns**

Type 1 concerns relate to significant concerns about the management of Health & Safety at a school, with no perceived immediate risk of harm or safety. Such concerns may include:

- Concerns about Head of School's ability to take accountability for the Health & Safety of students in their school and establishing an appropriate Health & Safety culture;
- Concerns about the competence or training of the Head of School in relation to Health & Safety;
- Concerns about the physical or mental health of Head of School; and
- Concerns about quality of regional oversight over school in question.

### **Type 2 – Immediate Concerns**

Type 2 concerns relate to an immediate risk of harm or safety. Such concerns may include:

- Concerns about risk of harm or fatality of a student; and
- Concerns about the physical or mental health of Head of School.

### **Procedure for escalation of a concern**

1. Reviewer communicates their concerns transparently with the Head of School, where appropriate.
2. Reviewer completes escalation form.
3. Escalation form is sent via email to Group Chief Education Officer and Head of Education Insight and Projects, with subject line stating 'Health & Safety Escalation'.
4. The escalation form is acknowledged with the Independent Health & Safety Reviewer and appropriate action is taken with the Cognita regional team.

### **Recommendations for the Regional Team**

There may be instances when an Independent Health & Safety Reviewer may wish to make a recommendation which is beyond the scope of an individual school, for example, a system recommendation. Recommendations should be made by the Independent Health & Safety Reviewer within the Regional Health & Safety Review Overview report. These recommendations should not be recorded on the individual school Health & Safety Review Report. Recommendations can be closed by the Regional Health & Safety Lead, with the oversight of the Regional CEO.

The Regional Health & Safety Lead is expected to show that all recommendations for Cognita have been closed out/actioned during the Annual Governance Meeting.

Due to the differing management structures across each Cognita region, multiple Regional Review Overview Reports may be written, e.g. for specific countries or school groupings within a region.

The distribution list for Regional Review Overview reports should be as follows:

- Regional CEO
- Regional Health & Safety Lead
- Regional Legal Counsel
- Regional Executive Team members, including: Operations Managers (if applicable), Director of Education and General/ Country Managers (if applicable);

- Group Chief Education Officer;
- Independent Health & Safety Review Team Leader (cc'd for the purpose of system oversight); and
- Head of Group Education Insight & Projects (cc'd for the purpose of system oversight).

At the request of the Regional Health & Safety Lead an informal post-review meeting may be scheduled with an Independent Health & Safety Reviewer following the end of the Independent Health & Safety Review Period.

### **Group-wide recommendations for Cognita**

Any Health & Safety recommendations made by the Independent Health & Safety Reviewer that impact the entire Cognita Group should be shared with the Group Chief Education Officer and Head of Group Education Insight & Projects directly via email.

### **Disagreement**

On the rare occasion where there is a disagreement relating to the outcome of an Independent Health & Safety Review, it is expected that every effort is made by the Independent Health & Safety Reviewer to deal with this directly with the school. Honest, evidence-based, communication will resolve the vast majority of issues. In the event of a disagreement, these can be raised with the Group Chief Education Officer who has the right to resolve and decide an outcome.

### **Raising concerns**

Any concerns about organisation-wide Health & Safety matters should be addressed to the Group Chief Education Officer.

Should the need arise, the opportunity to raise concerns outside of the routine reporting line also exists. In such an instance, any matters should be directed to the Group Chief Executive Officer.

## **Section 5: Glossary**

### **Annual Assurance Report**

A written report provided by the Regional Team to the Group Chief Education Officer in advance of the Annual Assurance Meeting.

### **Annual Assurance (Governance) Meeting**

Annual governance meetings chaired by the Group Chief Education Officer, with the purpose of evaluating each region's management and oversight system.

### **Annual Health & Safety Review Cycle**

The annual cycle of independent Health & Safety reviews, running from September to August.

appendi

### **Annual Health & Safety Review Schedule**

The agreed deployment schedule for the Annual Health & Safety Review Cycle, to be determined by the Group Chief Education Officer.

### **Cognita group**

The Cognita group worldwide, including its subsidiaries, offices, schools and camps/centres.

### **Governance**

Governance is the act of governing or overseeing the control and direction of an organisation, including providing a framework for managing organisations. Effective governance involves identifying who can make decisions, who has the authority to act on behalf of the organisation and who is accountable for how an organisation and its people behave and perform.

### **Group Policy: Health & Safety Governance and Oversight**

The primary document outlining how Health & Safety oversight and governance works across the Cognita Group. This includes detail regarding lines of accountability, levels of responsibility and the Health & Safety assurance processes that we employ.

### **Independent Health & Safety Review Process**

The process of instituting regular Health & Safety reviews, completed by an external party, at each Cognita school. This process is used as a mechanism for proprietorial oversight of Health & Safety at Cognita.

### **Independent Health & Safety Review Team**

The team of active Health & Safety reviewers commissioned by Cognita forms the Independent Health & Safety Review Team.

### **Independent Health & Safety Review Team Leader**

The chair of the Independent Health & Safety Review Team.

### **Proprietor**

The 'proprietor' of an independent school is the person or group responsible for the management of the school – typically the board of governors. The proprietor of each independent school has legal responsibilities in the area of safeguarding, Health & Safety, compliance and quality of provision and outcomes at the school.

### **Recommendation for Cognita**

Any recommendations from the Independent Review Team which cannot or should not be tackled at an individual school level. Instead, the regional team or Group Chief Education Officer may be expected to take responsibility for such recommendations.

### **Regional Key Performance Indicators**

A set of Key Performance Indicators (KPIs) that should be reported on annually by the regional team, used to assess their own compliance and performance.

### **Regional Review Overview**

An overview report written by the Independent Health & Safety Review Team following the completion of all reviews in a certain region/territory. This will include any recommendations for the regional team.

### **Regional Risk Register**

A risk register held at regional level and providing an overview of current Health & Safety risks within the region. The Health & Safety risks highlighted by each school in their risk register should be considered if creating and maintaining a Regional Risk Register.

### **SIRF**

Serious Incident Report Forms ('SIRFs') are used within Cognita to report serious incidents within the group that are related to Health & Safety and Safeguarding.

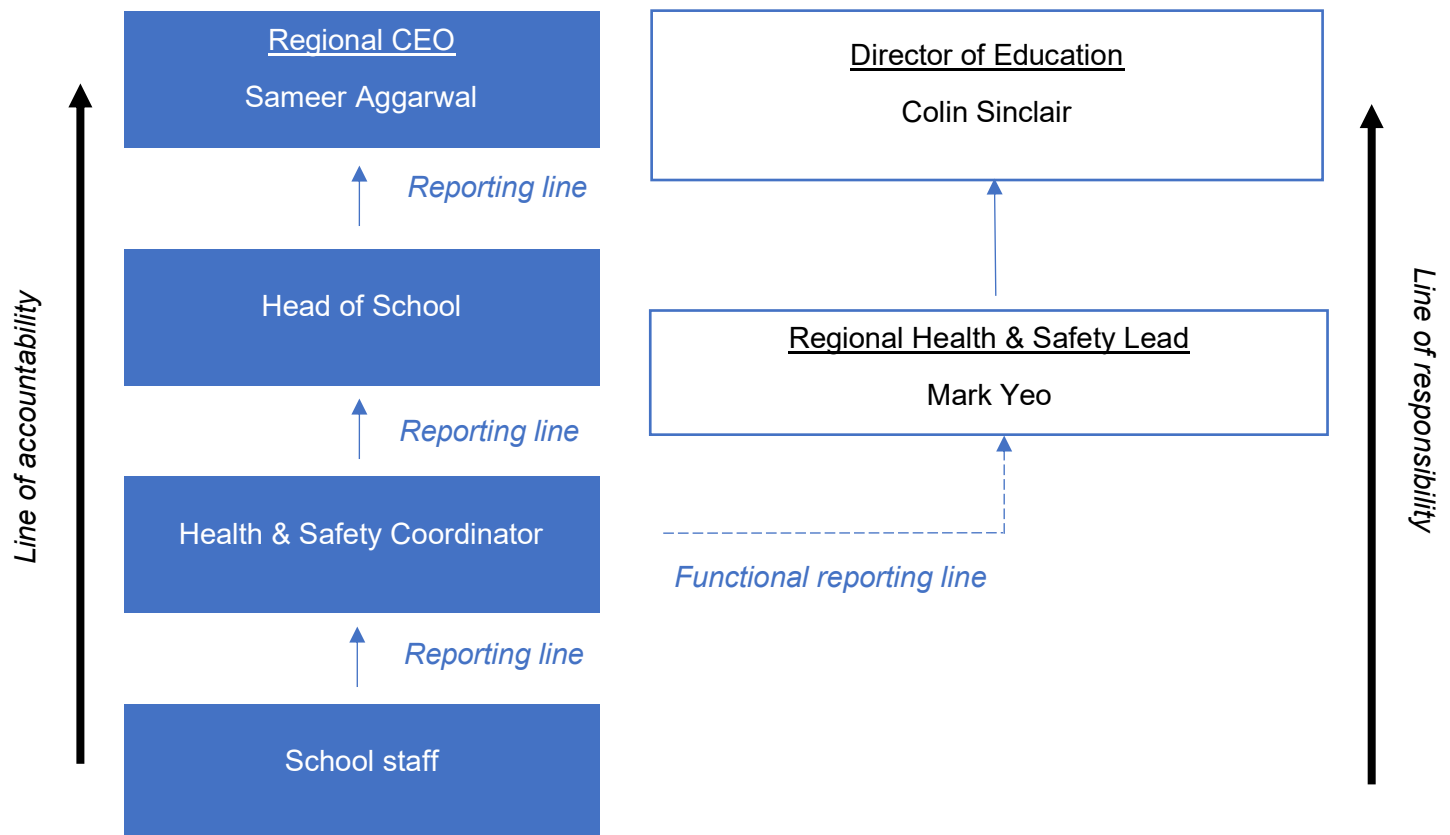
### **SIRF Log**

A record of SIRFs recorded within the region, managed by the regional team. A separate Group SIRF log is managed for SIRFs that are escalated to the Group Executive team.

## Section 6: Appendices

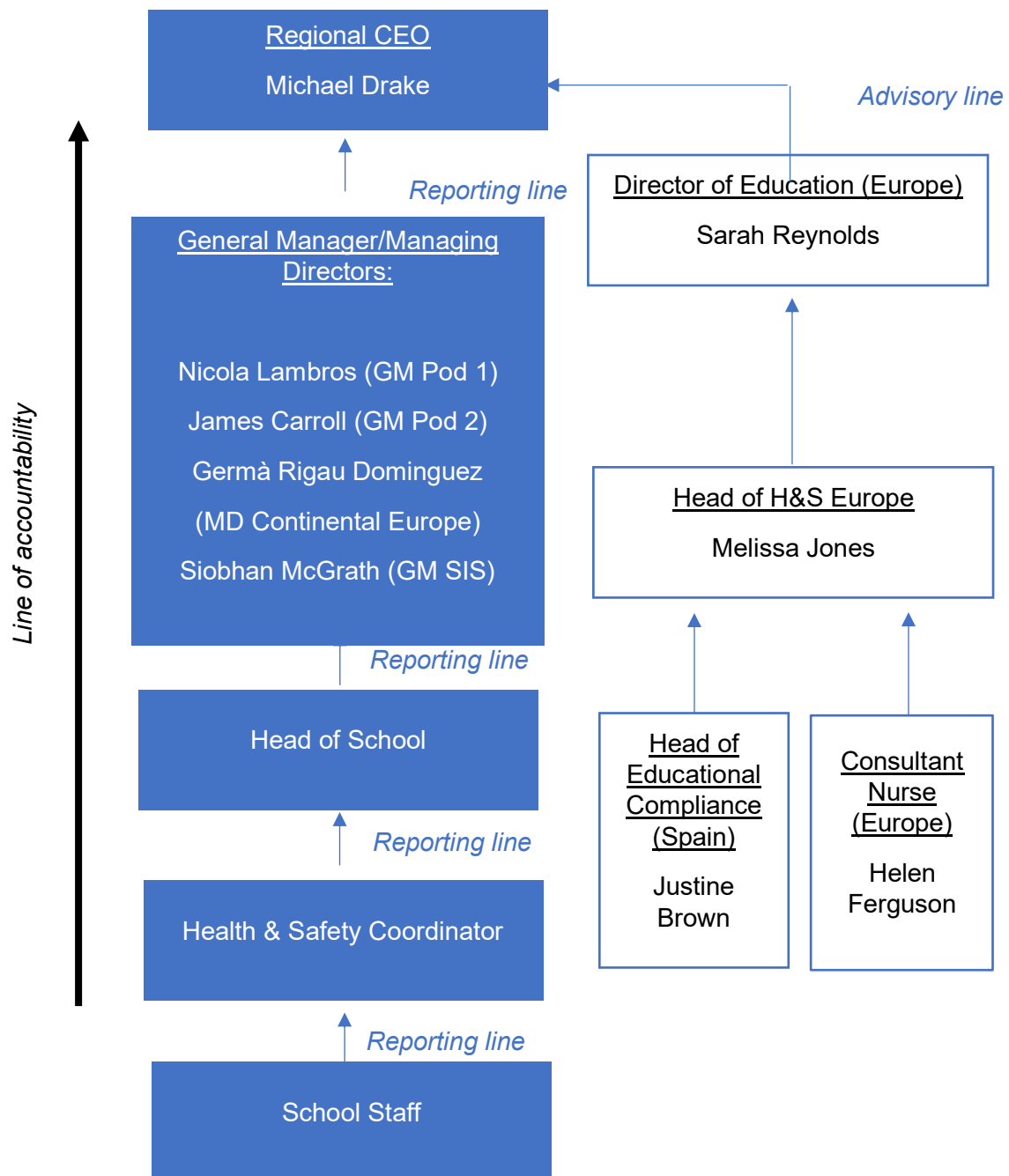
### Appendix 1 - Regional Health & Safety Execution Chart: Asia

*The roles and staff members shown below are correct as of June 2025. This structure chart will be updated within the next scheduled review of this document. As post-holders may change from time to time, it is recommended that the regional team are consulted directly if you have any queries in relation to the roles listed above and current post-holders.*



## Appendix 2 - Regional Health & Safety Execution Chart: Europe

The roles and staff members shown below are correct as of June 2025. This structure chart will be updated within the next scheduled review of this document. As post-holders may change from time to time, it is recommended that the regional team are consulted directly if you have any queries in relation to the roles listed above and current post-holders.



## Appendix 3 - Regional Health & Safety Execution Chart: Latin America

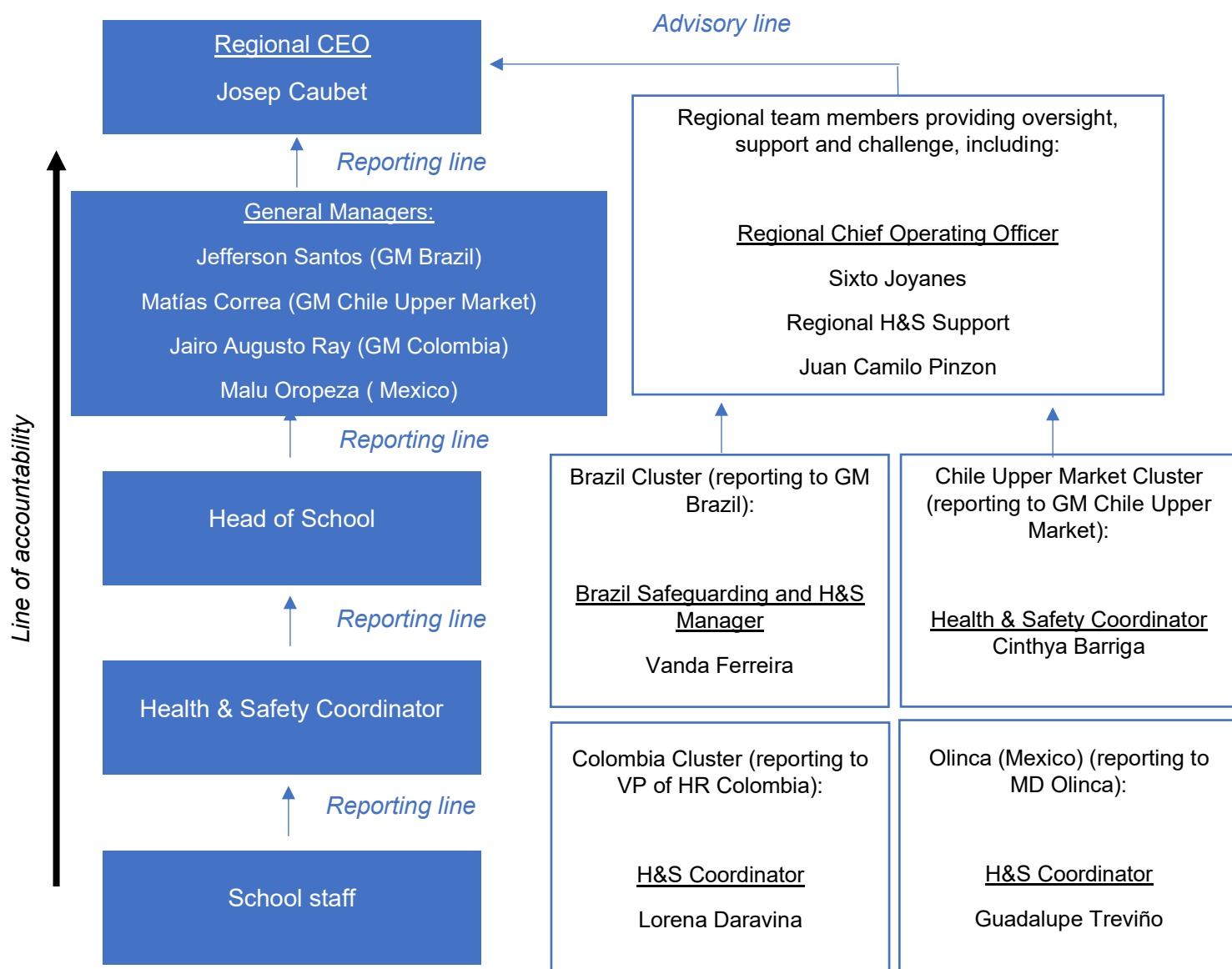
*The roles and staff members shown below are correct as of June 2025. This structure chart will be updated within the next scheduled review of this document. As post-holders may change from time to time, it is recommended that the regional team are consulted directly if you have any queries in relation to the roles listed above and current post-holders.*

The following schools are in the Chile Upper Market sub-region:

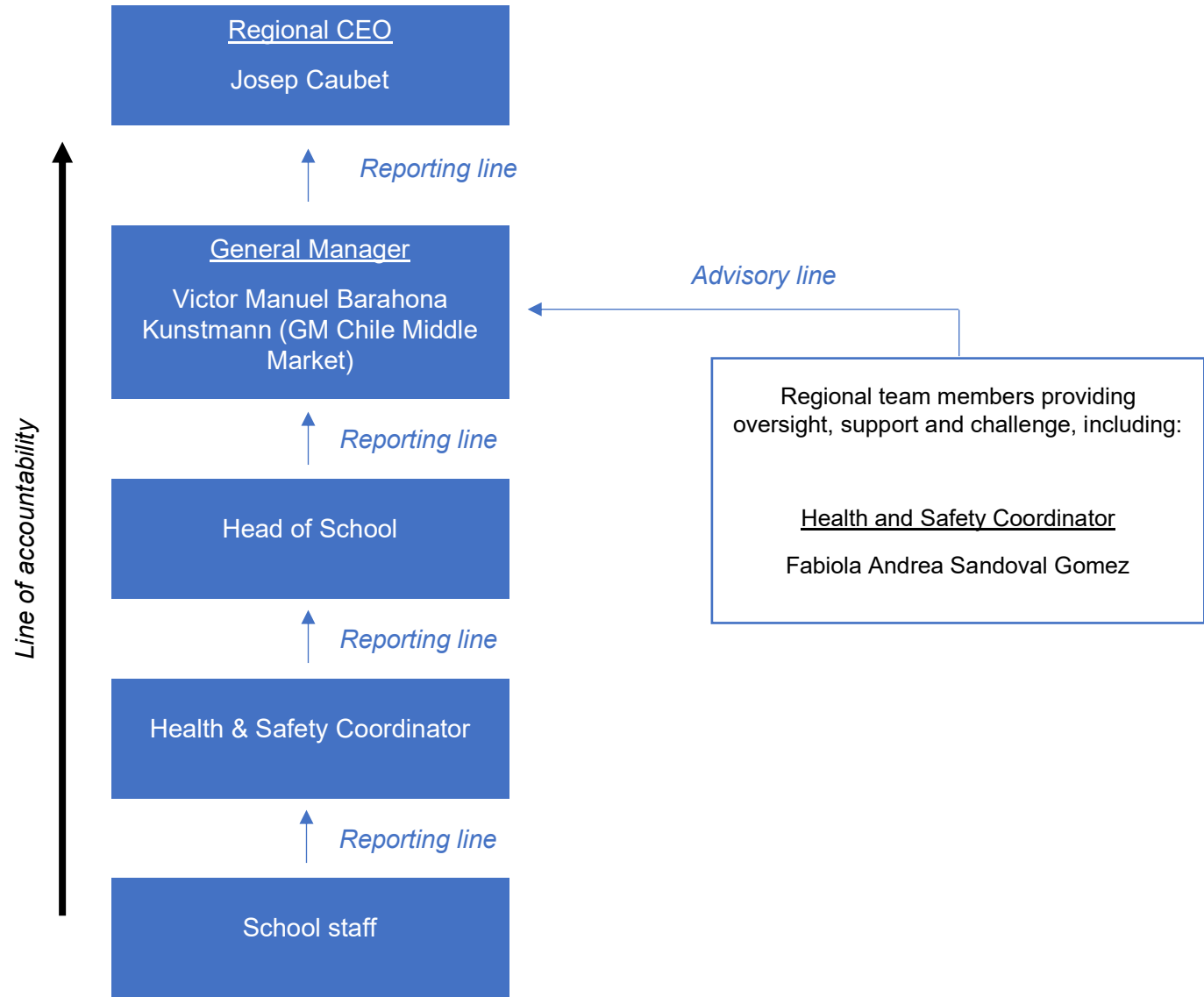
- San Francisco Javier Huechuraba
- Dunalastair School

NB. The regional CEO for LatAm will delegate responsibility for participation in Regional Assurance Board Meetings to the Regional HR, Safeguarding & Wellbeing Director and each General Manager, due to the devolved structure.

Regional Health & Safety Execution: Chile (Upper Market), Brazil, Colombia and Mexico

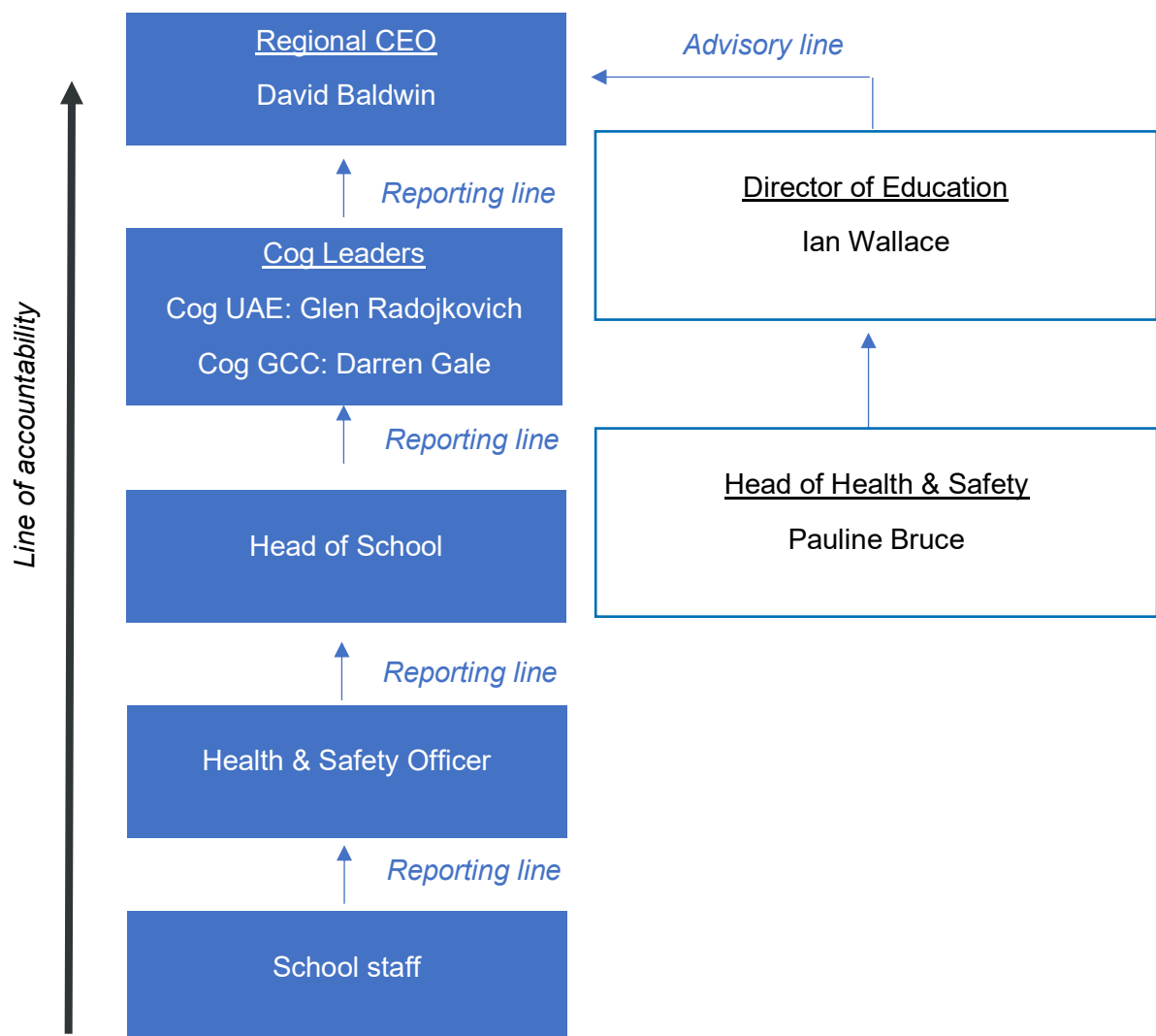


Regional Health & Safety Execution: Chile (Middle Market)



## Appendix 4 - Regional Health & Safety Execution Chart: Middle East

*The roles and staff members shown below are correct as of June 2025. This structure chart will be updated within the next scheduled review of this document. As post-holders may change from time to time, it is recommended that the regional team are consulted directly if you have any queries in relation to the roles listed above and current post-holders.*



## **Appendix 5 - Tariff days**

A tariff system is used for the allocation of time that the Independent Health & Safety Reviewer requires at each Cognita school, this is primarily based on school size and number of sites. As a guide:

One reviewer day per school (for schools based on one single site)

or

One reviewer day per site (for multi-site schools)

Where there are specific contextual considerations, e.g. a split site school, the tariff may be amended to ensure that the reviewer has an appropriate amount of time on site.

The Independent Health & Safety Reviewer is allocated one day for the review of each Cognita regional office.

## Appendix 6 - Scope of Independent Reviews

The purpose of this appendix is to provide detail about the scope of the Independent Reviews of Safeguarding and Health & Safety. Our independent review system is well established and is a core aspect of driving continuous improvement in our schools. In 2024 we undertook an exercise to have clarity on the scope of the reviews so that there is no assumption that a specific aspect is included that could lead to a false sense of assurance.

### Background to the review

The review was conducted by Alison Bailey (Lead Independent Health & Safety Reviewer) and Lucy Jeffreys (Lead Independent Safeguarding Reviewer) and asked the following questions:

1. What is included only in the Health & Safety review process?
2. What is included only in the Safeguarding Review process?
3. What is included in both the Health & Safety and Safeguarding review process? (Because the processes look at different aspects of practice)
4. What is not included in either independent review process?

The review specifically focused on the following areas:

- Medical and first aid
- Educational visits/field trips
- School transport
- Extra-curricular activities
- Special provisions
- Swimming pools

The chart below outlines the specific areas of overlap in the above five areas and, more importantly, the areas outside the scope of the Cognita Independent Review process.

Independent Health & Safety Reviews focus on compliance and facilities.  
Independent Safeguarding Reviews focus on usage and outcome.

Area	Health & Safety scope	Safeguarding, incl Safer Recruitment Scope	Specifics not covered
<b>Medical and first aid</b>	Medical and first aid policy scope, including: <ul style="list-style-type: none"> <li>○ Policy to practice.</li> <li>○ Policy revision within a timely period.</li> <li>○ Policy access platform to ensure availability and version control.</li> <li>○ Sampling of training matrix against the commitment within the policy (and against the regional training guide).</li> <li>○ Accuracy and effectiveness of any</li> </ul>	<ul style="list-style-type: none"> <li>○ Policy to practice evaluation.</li> </ul> <p>Information sharing:</p> <ul style="list-style-type: none"> <li>○ Check how information about medical needs, including care plans, are shared with staff.</li> </ul> <p>Sampling health care plans for range of needs, including:</p> <ul style="list-style-type: none"> <li>○ most significant &amp; consider how these inform risk assessment/</li> </ul>	<ul style="list-style-type: none"> <li>▪ Detailed medical oversight (scope of practice to maintain legal compliance including templates used by schools).</li> <li>▪ Regional statistic trends and evaluation.</li> <li>▪ Data protection in relation to medical records.</li> </ul>

	<p>extended assessment of first aid needs.</p> <p>Access and scope of:</p> <ul style="list-style-type: none"> <li>○ first aid resources;</li> <li>○ spaces; and</li> <li>○ equipment (including specialist teaching spaces).</li> </ul> <p>Also including sampling during the school tour.</p> <p>Review of the First Aid Room, including:</p> <ul style="list-style-type: none"> <li>○ Sampling of individual medication against care plans (and process for information sharing with others).</li> </ul> <p>Software &amp; information systems for medical management.</p>	<p>planning. Have they been amended for the venue/setting of the trip?</p> <p>Staff knowledge and understanding of the severity of medical conditions within the schools, including:</p> <ul style="list-style-type: none"> <li>○ medical / first aid lead and general staff. How do they know? What's their responsibility? What do they do in an emergency? How do they get help?</li> </ul> <p>Students - do they know how to access help?</p>	<ul style="list-style-type: none"> <li>▪ <b>SIRF criteria, compliance, and management.</b></li> </ul>
<b>Educational visits and field trips</b>	<p>Educational Visits Policy</p> <ul style="list-style-type: none"> <li>○ Outline evaluation of the policy scope in practice (categorisation and authorisation etc).</li> <li>○ Policy revision within a timely period.</li> <li>○ Policy and handbook (guidance) access platform to ensure availability and version control.</li> </ul> <p>Accident/incident</p> <ul style="list-style-type: none"> <li>○ Reporting process.</li> <li>○ Sampling against recent visit to evaluate appropriateness of training.</li> </ul>	<ul style="list-style-type: none"> <li>○ Policy to practice evaluation.</li> </ul> <p>EVOLVE system</p> <ul style="list-style-type: none"> <li>○ Sample the range of trips. (One day, Residential overseas, Residential in country, Local area and Sports fixtures. Focus on approval times.)</li> <li>○ Sample specific trip for child with health needs attended. Is provision for their needs clearly identified?</li> </ul> <p>Discussion with EVC and staff</p> <ul style="list-style-type: none"> <li>○ Sampling staff knowledge and understanding.</li> </ul> <p>Training</p> <ul style="list-style-type: none"> <li>○ Checking training log to ensure staff are trained at the level to lead the trip.</li> </ul> <p>Critical incident</p> <ul style="list-style-type: none"> <li>○ Trip leaders – in discussion with staff, what would they do in event of critical incident?</li> <li>○ Staff awareness of threat level (linked to Prevent and Anti-terrorism)</li> </ul>	<ul style="list-style-type: none"> <li>▪ <b>External agents and providers (assessment for suitability and insurance cover).</b></li> <li>▪ <b>Venue scope and suitability (such as trampoline parks, adventurous activities).</b></li> <li>▪ <b>Active monitoring (during trips and visits).</b></li> </ul>

<b>School transport</b>	<ul style="list-style-type: none"> <li>Policy and risk management in practice (for Home to school services, Shuttle services, School-owned vehicle fleets etc).</li> <li>Transport SLAs for outsourced providers (including transport and chaperones) and sampling documents references within this.</li> <li>Emergency arrangements and training.</li> </ul>	<ul style="list-style-type: none"> <li>Safeguarding Training of bus drivers and monitors.</li> <li>Confirming induction and refresher / training to confirm reporting safeguarding concerns to school.</li> </ul>	<ul style="list-style-type: none"> <li>Extra-curricular transport services.</li> <li>Educational visits transport providers.</li> <li>Detailed evaluation of insurance scope for providers and in-house services (including regional fleet/transport co-ordination to ensure legal compliance).</li> </ul>
<b>Extra-curricular activities</b>	<ul style="list-style-type: none"> <li>Assessment and suitability of ECA providers.</li> <li>Risk assessment sampling.</li> <li>Information sharing between the school and provider(s).</li> <li>Training appropriate to the service provision (food safety; swimming, etc).</li> </ul>	<p>Light touch only:</p> <ul style="list-style-type: none"> <li>Checks to see if external provider DSL cover is in place if provided by the school.</li> <li>Lettings checks to confirm they have Safeguarding policy or follow Cognita policy.</li> </ul> <p>Note: If a school is included in Safer Recruitment sample, contractors would be covered as part of school sampling.</p>	<ul style="list-style-type: none"> <li>Holiday clubs (scope, arrangements, emergency planning, and monitoring).</li> <li>Extended scope around wraparound care (including emergency arrangements; detailed SR checks; broader training; etc).</li> <li>Hire arrangements (potential commercial impact and general oversight/management)</li> <li>Student work experience</li> </ul>
<b>Special provisions</b>	<p>Risk management including:</p> <ul style="list-style-type: none"> <li>Facilities – hygiene, washing arrangements (bedding), etc.</li> <li>Cots/sleeping arrangements including room temperature etc.</li> <li>Monitoring and recording systems.</li> </ul>	<p>Facilities including:</p> <ul style="list-style-type: none"> <li>Supervision, visibility v privacy of intimate care area.</li> <li>Child use of facilities – increasing independence.</li> <li>Record-keeping in line with policy – sufficiently detailed to know what care given, by whom, when and when parents are notified.</li> <li>Paper or digital record-keeping sampling.</li> <li>Safe sleep protocols in place and followed.</li> </ul>	<ul style="list-style-type: none"> <li>Host families</li> <li>Homestay arrangements</li> </ul>
<b>Swimming pools</b>	<p>Management</p> <ul style="list-style-type: none"> <li>Evaluating the suitability of policy to practice alongside</li> </ul>		<p>Adventurous swimming pool activities</p> <ul style="list-style-type: none"> <li>e.g. use of specialist facilities</li> </ul>

	<p>written protocols for school use of the pool and any hired arrangements.</p> <ul style="list-style-type: none"> <li>○ Risk management and activity ratios – how RA is used to reflect controls for pool activities whilst ensuring suitable ratios are applied (for example, free swim versus structured lessons, age appropriateness, ability considerations, etc).</li> </ul> <p>Competency:</p> <ul style="list-style-type: none"> <li>○ Lifeguards – training validity vs policy.</li> <li>○ Instructors – training for those teaching being evaluated against local standards and activities.</li> </ul> <p>Facilities:</p> <ul style="list-style-type: none"> <li>○ Arrangements for water quality testing – daily testing (pH/Chlorine/temperature), scope of formal sampling (bacteriological etc).</li> <li>○ Facilities – general condition evaluated during the pool tour, alongside security, etc.</li> </ul>		<p>Swimming facilities off-site</p> <p>Pool plant operations</p> <ul style="list-style-type: none"> <li>○ Chemical dosing</li> <li>○ Condition of plant rooms</li> </ul> <p>Legal checking of Pool Safety Operating Procedures</p> <ul style="list-style-type: none"> <li>○ Checking correct 'origin' policies for local or national regulatory bodies</li> <li>○ Checking practice vs specific local training and competency requirements.</li> </ul>
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In understanding the above, it is worth reminding ourselves about the purpose for Independent Reviews in Cognita. They are undertaken on behalf of the Cognita board as part of our governance arrangements. As such, they cannot go into every detail of the above areas. There is an expectation that operational accountability sits in each school and that regions also have mechanisms through their in-region governance arrangements for ensuring that we maintain the highest standards.

Regional CEOs were made aware of these areas in May 2024 with the action that they should ensure that oversight and checking of the content of the right-hand column sits within regional responsibilities.

## Appendix 7 - Stages of the Independent Review Process

<b>Pre-review</b>	<p><u>Preparation for the upcoming review cycle</u></p> <ul style="list-style-type: none"> <li>▪ Reviewers confirm availability for upcoming academic year.</li> <li>▪ Annual Review Schedule is confirmed with all parties involved.</li> </ul>
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	<ul style="list-style-type: none"> <li>Annual review of each rubric and report template occurs for the upcoming Review Cycle. The final version of the rubric is agreed between the Regional Lead and the Independent Reviewers (led by Independent Reviewers).</li> <li>Regional Lead meets with the Independent Reviewers conducting reviews in the region to update them on the current picture in the region.</li> </ul> <p><u>Preparation for the school review</u></p> <ul style="list-style-type: none"> <li>Reviewer provides information to school in advance of their upcoming review to guide them regarding necessary preparation, including associated documents.</li> </ul>
<b>Review</b>	<ul style="list-style-type: none"> <li>Independent Reviewer completes the review and ensures that clear verbal feedback is provided before leaving the school.</li> </ul>
<b>Post-review</b>	<ul style="list-style-type: none"> <li>Independent Reviewer drafts the report using the agreed template.</li> <li>Final version of the report is agreed and signed off by the Independent Reviewer.</li> <li>Report circulated to distribution list in PDF format. Expected timescale for distribution of report is three weeks.</li> </ul> <p><u>Preparation for regional review</u></p> <ul style="list-style-type: none"> <li>Independent Review Team produces Regional Overview Report, detailing common findings and recommendations for the region.</li> <li>Optional informal meeting may be scheduled between the Regional Lead and the Independent Reviewer to provide general feedback on progress observed in the region.</li> </ul>

## Appendix 8 - The Bigger Picture of Health & Safety within Cognita

### SCHOOLS

The Head of School, at each Cognita school, is accountable for the standards of Health & Safety at their school.

- SIRF Reporting
- Health & Safety Coordinators
- Experienced Heads
- Training
- External Health & Safety Reviews

### REGIONAL TEAM

The regional team is responsible for overseeing Health & Safety arrangements within their region.

- Managing SIRFs
- Submitting an Annual Report
- Regional Health & Safety Leads
- Regional Assurance Board meetings

**PROMOTING THE SAFETY OF CHILDREN, WORKERS,  
CONTRACTORS AND VISITORS IS EVERYONE'S  
RESPONSIBILITY**

### INDEPENDENT HEALTH & SAFETY REVIEWER

The Independent Health & Safety Reviewer is responsible for reviewing Health & Safety practices across all Cognita schools and offices against an agreed framework.

- Consultant expert at Annual Governance Meetings
- Completing school reviews
- Shared learning sessions for regional team members
- Annual review of review framework/rubric

### GROUP CHIEF EDUCATION OFFICER

The Group Chief Education Officer is responsible for setting and providing oversight of the Group Policy: Health & Safety Governance and Oversight on behalf of the Group CEO.

- Annual Governance Meetings
- Scheduling of External Health & Safety Reviews
- Review of the Cognita Health & Safety policy
- Annual reporting to the board

<b>Ownership and consultation</b>	
Document sponsor (role)	Group Chief Education Officer
Issuing authority	Cognita Holdings Limited
Operational document owner	Kristie Overton, Head of Group Education Insight & Projects
Consultation	<p><u>Group</u> Jayne Pinchbeck, Group General Counsel (July 2022)</p> <p><u>Regions</u>            Asia:            Eric Van Den Berg, Regional CEO Asia (July 2022)            Gwendolene Yeo, Regional Managing Director (Operations) (July 2022)            Mark Yeo, Regional Health &amp; Safety Lead (July 2022)</p> <p>Europe:            Michael Drake, Regional CEO Europe (July 2022)            Melissa Jones, Regional Health &amp; Safety Lead (July 2022)            Ian Thistlewood, Chief Operating Officer (July 2022)            Justine Brown, Health &amp; Safety Lead, Spain and Italy (July 2022)            Jamie Delaney, Group Legal Counsel (Aug 2022)</p> <p>LatAm:            Josep Caubet, Regional CEO LatAm (July 2022)            Sixto Joyanes Gonzalez, Director of Operations LatAm (July 2022)</p> <p>Middle East:            Dave Baldwin, CEO Middle East (July 2022)            Martin Filkins, Director of Operations and Enrolments Middle East (July 2022)</p> <p><u>Independent Health &amp; Safety Reviewer</u>            Alison Bailey, Independent Health &amp; Safety Reviewer (July 2022)</p>

<b>Audience</b>	
Audience	Group Executive Team Regional Health & Safety Leads Group and Regional Legal Counsel

<b>Document application and publication</b>	
Europe region	Yes
Asia region	Yes
Latin America region	Yes
Middle East region	Yes

<b>Implementation and Review</b>	
Implementation date	August 2024

<b>Version control</b>			
Issue	Date	Author	Reason
01	18.08.2022	Simon Camby	Revision
02	31.07.2023	Simon Camby	Annual Update
03	31.07.2024	Simon Camby	Annual Update
04	30.06.2025	Simon Camby	Annual Update