

# Group Policy: Integration of Newly Acquired Schools August 2025



## Table of Contents

<i>Section 1: Introduction.....</i>	<i>3</i>
<i>Section 2: Safeguarding.....</i>	<i>5</i>
<i>Section 3: Safer Recruitment .....</i>	<i>7</i>
<i>Section 4: Health &amp; Safety.....</i>	<i>9</i>
<i>Section 5: Education.....</i>	<i>11</i>
<i>Section 6: Review of Newly Acquired Schools.....</i>	<i>13</i>
<i>Appendix 1: Guidance on education policies.....</i>	<i>14</i>

## Section 1: Introduction

### Purpose

The purpose of this document is to outline agreed arrangements for the governance and oversight of newly acquired schools in relation to: Safeguarding; Safer Recruitment; Health and Safety; and Education.

### Definition

Integration is the process of bringing a newly acquired school into the ways of working of Cognita. This includes, but is not limited to culture, policies, processes, systems and reporting requirements.

### Related documentation

This document should be read alongside the documents listed below as they provide further context for understanding the group-wide accountabilities and responsibilities for Safeguarding (including Safer Recruitment) and Health & Safety.

- Group Policy: Safeguarding Governance and Oversight
- Group Policy: Health and Safety Governance and Oversight
- Group Policy: Serious Incident Reporting in relation to Safeguarding and Health & Safety
- Group Policy: Safer Recruitment Governance and Oversight
- Group Policy: Educational Visits Governance and Oversight
- Group Policy: Risk Register

### Due diligence

Specific due diligence questionnaires are used by the Mergers and Acquisitions team during the due diligence process. The findings from the due diligence are used to:

- identify concerns and/or red flags;
- inform the business case;
- identify the resource requirement to bring the school to Cognita standards; and
- identify where specialist support may be required linked to context-specific requirements.

For further information about the due diligence questionnaires used by the Mergers and Acquisitions team please contact the Cognita Mergers and Acquisitions team.

### Budgeting

This policy is designed to inform the development of the business case for any potential acquisition. The comparison of perceived standards from the due diligence process vs expected Cognita standards can be used to agree the investment required following acquisition to bring the school to the expected standard (see indicative timescales below).

Of specific note, the Mergers and Acquisitions team will use an agreed defined amount (per region) in the business case to allow for the full remediation of employee files against Cognita's Safer Recruitment standards.

### **Accountability**

Accountability for integration sits within the Cognita region where the school is situated. The Regional CEO has the ultimate accountability for integration. The Regional CEO is responsible for holding members of their team to account for the implementation of this policy.

### **Responsibility**

Each Regional CEO will ensure that members of the regional team understand their accountability and responsibility in relation to integration. This should be referenced in role profiles and agreed goals.

### **Planning and reporting**

There is an expectation that each region maintains an integration plan for each school. Each integration plan will take account of the school's starting position and consider the school's context, building on due diligence findings during the acquisition process.

Regions should report, as required, on the process and progress of integration of any schools in the region. This always takes place in the Annual Assurance Meeting and will be reported from time to time via Monthly Business Reviews throughout the year.

### **Indicative timelines**

In agreeing this policy, the Group Executive Team agreed indicative integration timelines as outlined below:

- **Safeguarding:** It is expected that schools should be working within band 3 within one full school year post-acquisition.
- **Safer Recruitment:** It is expected that all employee files within new schools should be fully remediated within one year of acquisition.
- **Health & Safety:** It is expected that schools should be working within band 3 within one full school year post-acquisition.
- **Education:** It is expected that schools should be working within band 3 within one full school year post-acquisition.

### **Integration**

The following sections outline a high-level rubric for integration for four core areas of work. These are used to guide integration and to report on the progress of integration by the regional teams.

## Section 2: Safeguarding

Safeguarding students is our number one priority. This means that the integration of safeguarding requirements will be a priority after the point of acquisition. The following points are provided as a list of priorities to provide robust guidance and direction for safeguarding integration:

- Clarifying the local context and legislation for safeguarding and adapting the Safeguarding Policy to local legislation.
- Providing the big picture and explaining the importance of safeguarding in Cognita, to raise awareness including the importance of our Culture of Care, Policy & Processes.
- Establishing safeguarding oversight and reporting structure in the school & region.
- Training for Principal, School SLT, Safeguarding Lead and Deputy Safeguarding Leads, including responsibilities for accountability and oversight of Safeguarding Model.
- Training for all staff.
- Understanding types of abuse to report and record concerns about students and escalating serious incidents.
- Understanding and dealing with concerns and allegations about adults, including Low-Level Concerns.
- Supporting the community to understand safeguarding.
- Developing curriculum and learning that includes safeguarding.
- Increasing the student voice in the school.
- Any other content in the safeguarding policy.

Tracking the progress of integration for Safeguarding					
	1 (Indicative 0-20%)	2 (Indicative 21-40%)	3 (Indicative 41-60%)	4 (Indicative 61-80%)	5 (Indicative 81-100%)
Culture	An <b>in-person evaluation</b> has been completed by the Regional Team, observing a baseline of safeguarding <b>culture</b> . School understands importance of safeguarding culture plus processes.	A strong safeguarding <b>culture is emerging</b> within the school.	A strong safeguarding <b>culture is becoming established</b> within the school.	A strong safeguarding <b>culture is consistently evidenced</b> within the school.	<b>Business as usual</b> (Once here, integration reporting for safeguarding ceases)
Documentation	An <b>in-person evaluation</b> has been completed by the Regional Team, observing a baseline for safeguarding <b>processes</b> and corresponding <b>documentation</b> .  Understanding of the <b>local regulatory</b> and <b>cultural context</b> has been developed by the regional team, including through an <b>in-person</b> visit.	<b>Pre-existing documentation</b> reviewed against external regs/legislation and Cognita standard practice; leading to <b>policy introduction</b> (in accordance with Cognita standards).	<b>Regional Safeguarding Policy</b> in place with shared understanding. This may include agreed prioritisation for policy elements (i.e. not implementing all aspects of policy).	<b>Regional Safeguarding Policy</b> in place for all aspects, understood and operational in <b>all phases</b> of the school.  Full adoption of regional <b>compliance matrix</b> .	
Systems and processes	<b>Safeguarding integration plan</b> developed and put in place with timelines & monitoring arrangements.  <b>Early stages</b> of integration with limited arrangements in place.	<b>Clear progress</b> with <b>safeguarding integration plan</b> , adhering to timelines & monitoring arrangements.  <b>Structures and systems</b> for safeguarding leadership and management in place.	<b>Structures and systems</b> for safeguarding leadership and management are in place, with clear <b>understanding</b> amongst colleagues.  <b>Clear systems</b> exist for reporting, recording and responding to <b>concerns (of abuse) about students</b> and concerns regarding <b>allegations against adults</b> incl, LLC.  Clear links with relevant <b>local agencies</b> are in place.	<b>Structures and systems</b> for safeguarding leadership and management are in place, with <b>proven success</b> and a clear understanding amongst colleagues.  <b>Clear systems</b> exist for reporting, recording and responding to <b>concerns (of abuse) about students</b> and concerns regarding <b>allegations against adults</b> incl, LLC., with evidence of <b>effectiveness</b> of reporting.  Clear links with relevant <b>local agencies</b> are in place.	
Training	An <b>in-person evaluation</b> has been completed by the Regional Team, observing a baseline for safeguarding <b>expertise</b> and evaluating <b>training</b> needs.	<b>Training</b> undertaken by <b>key</b> members within the agreed structure.  Initial participation in Cognita <b>training and networks</b> .	<b>Training</b> undertaken by <b>all</b> school safeguarding leaders.  Participation in Cognita <b>training and networks</b> .	<b>Broad safeguarding training</b> offered in school, building expertise throughout entire school.  Active participation in Cognita <b>training and networks</b> , including sharing practices where appropriate.	

### Section 3: Safer Recruitment

Safer Recruitment is a core aspect of safeguarding and an essential component of keeping our students safe. The following points are provided as a list of priorities to provide robust guidance and direction for safer recruitment integration:

- Clarifying the local context and labour legislation for recruiting and vetting.
- Establishing oversight arrangements including policy and related processes that specify school responsibilities in relation to local safer recruitment practices.
- Identify safer recruitment roles for the school.
- Training HR, SCR champions and SLT members on safer recruitment and their responsibilities for oversight, including remediation guidance.
- Understanding Risk Assessments and how to use them well due to their complexity.
- Understanding the connection between Safer Recruitment and the Low-Level Concern safeguarding practice due to the importance of this connection.
- Commencing Safer Recruitment remediation using the following order of employee category (within each category start with the most recently hired, working back to the longest serving employees):
  - Senior Leaders as they have overall responsibility for Safer Recruitment
  - Teaching colleagues
  - Teaching Assistants
  - Non classroom-based employees (including staff appointed by parents in some jurisdictions)
  - Support employees
  - Third party
- Once remediation has begun all new hires must go through the full process to avoid them being added to the remediation list.
- Any other content in the Safer Recruitment policy.

Tracking the progress of integration for Safer Recruitment					
	1 (Indicative 0-20%)	2 (Indicative 21-40%)	3 (Indicative 41-60%)	4 (Indicative 61-80%)	5 (Indicative 81-100%)
Culture	An <b>in-person evaluation</b> has been completed by the Regional Team, observing a baseline of Safer Recruitment culture. School understands importance of Safer Recruitment <b>culture</b> plus processes.	A strong Safer Recruitment <b>culture</b> is <b>emerging</b> within the school.	A strong Safer Recruitment <b>culture</b> is <b>becoming established</b> within the school.	A strong Safer Recruitment <b>culture</b> is <b>consistently evidenced</b> within the school.	<b>Business as usual</b> (Once here, integration reporting for Safer Recruitment ceases)
Documentation	An <b>in-person evaluation</b> has been completed by the Regional Team, observing a baseline for Safer Recruitment <b>processes</b> and corresponding <b>documentation</b> .  Understanding of the <b>local regulatory</b> and <b>cultural context</b> has been developed by the regional team, including through an <b>in-person</b> visit.	<b>Pre-existing documentation</b> reviewed against external regs/legislation and Cognita standard practice; leading to <b>policy</b> introduction (in accordance with Cognita standards).	<b>Regional Safer Recruitment Policy</b> in place with shared understanding. This may include agreed prioritisation for policy elements (i.e. not implementing all aspects of policy).  Understanding of <b>Risk Assessment</b> and <b>Low Level Concerns Policy</b> .	<b>Regional Safer Recruitment Policy</b> in place for all aspects, understood and operational in <b>all phases</b> of the school.  Full adoption of regional <b>compliance matrix</b> .	
Systems and processes	<b>Safer Recruitment integration plan</b> developed and put in place with timelines & monitoring arrangements.  <b>Early stages</b> of integration with limited arrangements in place.	<b>Clear progress</b> with <b>Safer Recruitment integration plan</b> , adhering to timelines & monitoring arrangements.  <b>Structures and systems</b> for Safer Recruitment leadership and management in place.  New 'safer' recruitment <b>process</b> in place for all new hires.	<b>Structures and systems</b> for Safer Recruitment leadership and management are in place, with clear <b>understanding</b> amongst colleagues.	<b>Structures and systems</b> for Safer Recruitment leadership and management are in place, with proven <b>success</b> and a clear <b>understanding</b> amongst colleagues.  <b>Safer Recruitment remediation</b> completed for all existing employees.	
Training	An <b>in-person evaluation</b> has been completed by the Regional Team, observing a baseline for Safer Recruitment <b>expertise</b> and evaluating <b>training</b> needs.	<b>Training</b> undertaken by <b>key</b> members within the agreed structure.  Initial participation in Cognita <b>training and networks</b> .	<b>Training</b> undertaken by <b>all</b> relevant colleagues in school.  Participation in Cognita <b>training and networks</b> .	<b>Training</b> undertaken to build understanding of importance of Safer Recruitment throughout entire school.  Active participation in Cognita <b>training and networks</b> , including sharing practices where appropriate.	



## Section 4: Health & Safety

Health & Safety is an essential component of ensuring a safe learning and working environment. The following points are provided as a list of priorities to provide robust guidance and direction for health and safety integration:

- Clarifying the local context and legislation for Health & Safety.
- Clarify the local Health & Safety management arrangements including organisational structure, outsourced Health & Safety arrangements, and existing training for those with key Health & Safety responsibilities.
- Establish Health & Safety oversight and reporting structure in the school.
- Review the building and premises to evaluate any design concerns that present a potential risk to safety.
- Evaluate physical and operational security measures alongside emergency arrangements.
- Establish gap analysis against a top line evaluation of local Health & Safety legislation.
- Reporting and recording of SIRFs.
- Any other content in Health & Safety Policy.

Tracking the progress of integration for Health & Safety					
	1 (Indicative 0-20%)	2 (Indicative 21-40%)	3 (Indicative 41-60%)	4 (Indicative 61-80%)	5 (Indicative 81-100%)
Culture	An <b>in-person evaluation</b> has been completed by the Regional Team, observing a baseline of Health & Safety culture. School understands importance of Health & Safety <b>culture</b> plus processes.	A strong Health & Safety <b>culture</b> is <b>emerging</b> within the school.	A strong Health & Safety <b>culture</b> is <b>becoming established</b> within the school.	A strong Health & Safety <b>culture</b> is <b>consistently evidenced</b> within the school.	<b>Business as usual</b> (Once here, integration reporting for Health & Safety ceases)
Documentation	An <b>in-person evaluation</b> has been completed by the Regional Team, observing a baseline for Health & Safety <b>processes</b> and corresponding <b>documentation</b> .  Understanding of the <b>local regulatory</b> and <b>cultural context</b> has been developed by the regional team, including through an <b>in-person</b> visit.	<b>Pre-existing documentation</b> reviewed against external regs/legislation and Cognita standard practice; leading to <b>policy</b> introduction (in accordance with Cognita standards).	<b>Regional Health &amp; Safety Policy</b> in place with shared understanding. This may include agreed prioritisation for policy elements (i.e. not implementing all aspects of policy).	<b>Regional Health &amp; Safety Policy</b> in place for all aspects, understood and operational in <b>all phases</b> of the school.  Full adoption of regional <b>compliance matrix</b> .	
Systems and processes	<b>Health &amp; Safety integration plan</b> developed and put in place with timelines & monitoring arrangements.  <b>Early stages</b> of integration with limited arrangements in place.	<b>Clear progress</b> with <b>Health &amp; Safety integration plan</b> , adhering to timelines & monitoring arrangements.  <b>Structures and systems</b> for Health & Safety leadership and management in place.	<b>Structures and systems</b> for Health & Safety leadership and management are in place, with clear <b>understanding</b> amongst colleagues.  Clear systems exist for <b>reporting, recording and responding to Health &amp; Safety related concerns</b> .  Clear links with relevant <b>local agencies</b> are in place.	<b>Structures and systems</b> for Health & Safety leadership and management are in place, with proven <b>success</b> and a clear <b>understanding</b> amongst colleagues.  Clear systems exist for <b>reporting, recording and responding to Health &amp; Safety related concerns</b> , with evidence of <b>effectiveness</b> of reporting.  Clear links with relevant <b>local agencies</b> are in place.	
Training	An <b>in-person evaluation</b> has been completed by the Regional Team, observing a baseline for Health & Safety <b>expertise</b> and evaluating <b>training</b> needs.	<b>Training</b> undertaken by <b>key</b> members within the agreed structure.  Initial participation in Cognita <b>training and networks</b> .	<b>Training</b> undertaken by <b>all</b> school Health & Safety leaders.  Participation in Cognita <b>training and networks</b> .	<b>Broad Health &amp; Safety training</b> offered in school, building expertise throughout entire school.  Active participation in Cognita <b>training and networks</b> , including sharing practices where appropriate.	

## Section 5: Education

Delivering a Holistic Education of the highest quality to allow students to thrive is our key focus. Each Cognita school has a bespoke educational model. The following points are provided as a list of priorities to provide robust guidance and direction for the integration of new schools in relation to education:

- Clarifying the local context, legislation, inspection/accreditation systems and expectations relating to education.
- Clarify the local management arrangements and pedagogical approach to education within the school, including building an understanding of the organisational structure, curricula, training programmes and the school's values.
- Clarify position with status of policies in school.
- Establish a systematic approach to the oversight of education and reporting to Cognita within the school, including by determining a cadence of Quality Assurance Reviews (if applicable), School Improvement Reviews and governance meetings.

Tracking the progress of integration for Education					
	1 (Indicative 0-20%)	2 (Indicative 21-40%)	3 (Indicative 41-60%)	4 (Indicative 61-80%)	5 (Indicative 81-100%)
Overall Approach	A baseline <b>in-person evaluation</b> has been completed by the Regional Team in relation to education, building on due diligence report (could include Quality Assurance Review).  Introduction to <b>Cognita Quality Framework</b> with at least full leadership team undertaken.	Engagement with <b>Cognita Quality Framework</b> amongst leadership team, with clear strategy for <b>integrating</b> within school life.  Introduction to <b>Cognita Quality Framework</b> with all senior and middle leadership teams undertaken.	<b>Cognita Quality Framework</b> is <b>becoming established</b> within the school, with progress to bring this to life in school.  Introduction to <b>Cognita Quality Framework</b> for <b>entire</b> school community.	Evidence that the <b>Cognita Framework</b> is in place to inform school improvement planning etc.	<b>Business as usual</b> (Once here, integration reporting for Education ceases)
Documentation	Audit of key educational <b>policies<sup>1</sup> and procedures</b> undertaken, with identified gaps and actions in place.  Understanding of the <b>local regulatory</b> and <b>cultural context</b> has been developed by the regional team, including through an <b>in-person</b> visit.	<b>Gaps and actions</b> identified during initial audit of key educational policies and procedures <b>resolved</b> .  <b>Timelines and approach</b> agreed for introduction of supporting <b>educational policies</b> (in accordance with Cognita standards).	Clear <b>progress</b> with introduction of <b>Cognita educational policies</b> (including key and supporting policies), to ensure Cognita standards are met and adhering to agreed <b>timelines</b> .	<b>Full adoption</b> of regional policy suite.	
Systems and processes	An <b>integration plan</b> is in place with timelines & monitoring arrangements made, in relation to education.  <b>Early stages</b> of integration with limited arrangements in place.  Integration plan captures agreed timing for when the school will complete the <b>Voice of the Student Care and Wellbeing (C&amp;W) Survey</b> (and Voice of the Student Graduate Survey (as this occurs concurrently)) for the first time.	<b>Clear progress</b> with <b>Education integration plan</b> , adhering to timelines & monitoring arrangements.  School introduced to key <b>processes and systems relating to Intelligent Accountability</b> , e.g. School Improvement review, Networks, Governance, Data Expectations (including academics and destinations) etc.  School introduced to key <b>processes and systems relating to Knowledge Animation</b> , e.g. CogX, DL website, networks etc.  School has prepared for first iteration of the <b>Voice of the Student</b> (C&W and Graduate survey), ensuring participation for all students aged 7+.	<b>Continued progress</b> with <b>Education integration plan</b> , adhering to timelines & monitoring arrangements and working to close out actions.  <b>Intelligent Accountability mechanisms</b> (Governance, SIRs, Talent Mapping etc) in place but may not yet be fully developed.  Awareness of <b>Cognita Knowledge Animation mechanisms</b> (CogX, DL website, networks) in place but school may not yet be engaging in full.  <b>Voice of the Student survey</b> (C&W and Graduate) has occurred, with discussion and actions agreed from survey insights.	Full adoption of <b>regional oversight systems</b> , for all three system capabilities.  Active engagement with Cognita system, including participation in <b>Cognita training and networks</b> , including sharing practices where appropriate.  <b>Voice of the Student survey</b> (C&W and Graduate) are embedded processes within the school.  <b>Voice of the Student Learner survey</b> has occurred for the first time or is scheduled for use during the academic year. Clear process agreed regarding how the school will digest and respond to survey insights.	

<sup>1</sup> See Group Education Handbook for guidance on education policies  
© 2025 Cognita Holdings Limited. All rights reserved.

## Section 6: Review of Newly Acquired Schools

A specific approach is adopted to the review of new or newly acquired schools, in relation to Safeguarding and Health & Safety within Cognita. The section below outlines the approach to the review of Newly Acquired Schools within Cognita.

### New Acquisition Reviews

We aim for our Independent Review Team to complete a New Acquisition review in relation to both Safeguarding and Health & Safety within six months (not inclusive of school holidays) from the point of legal ownership of a newly acquired school. In this instance, the regional team are expected to determine whether they would prefer for Newly Acquired Schools to be visited by an Independent Health & Safety Reviewer and an Independent Safeguarding Reviewer simultaneously or on separate occasions.

When visiting Newly Acquired Schools, the Independent Safeguarding Reviewer evaluates the school, in accordance with guidance for New Acquisitions and subsequently writes a New Acquisition Review Report. This is informed by a written self-evaluation from the school. The Independent Safeguarding Reviewer is expected to focus on understanding the context of the school, providing a commentary on the current position of the school and detailing their developmental recommendations, within the New Acquisition Review Report. RAG judgments are not provided by the Independent Safeguarding Reviewer within the New Acquisition Review Report.

When visiting Newly Acquired Schools, the Independent Health & Safety Reviewer evaluates the school, in accordance with guidance for New Acquisitions and subsequently writes a New Acquisition Review Report. This is informed by a written self-evaluation from the school. The Independent Health & Safety Reviewer is expected to focus on understanding the context of the school, providing a commentary on the current position of the school and detailing their developmental recommendations, within the New Acquisition Review Report. RAG judgments are not provided by the Independent Health & Safety Reviewer within the New Acquisition Review Report.

Each New Acquisition Review is shorter than the standard full Independent Safeguarding Review or Independent Health & Safety Review. The exact date and duration of the review will be determined by the Group Chief Education Officer, in conjunction with the Independent Safeguarding/Health & Safety Reviewer, alongside the regional team, in advance of the New Acquisition Review. The exact duration will depend on a variety of factors, including the size and complexity of the school.

### First Full Review

We aim for our Independent Review Team to complete a full review in relation to both Safeguarding and Health & Safety within one year of the New Acquisition review. We acknowledge that in certain cases, there may be some deviation from this timing, for the purpose of aligning the dates of the review with pre-existing travel arrangements to the region or territory in question.

It should be noted that during the first full safeguarding review all schools receive Safer Recruitment sampling by the Independent Safeguarding Reviewer.

<b>Ownership and consultation</b>	
Document sponsor	Group Chief Education Officer
Issuing authority	Cognita Holdings Limited
Operational owner	Kristie Overton, Head of Group Education Insight and Projects
Consultation	<p><u>Group</u>            Jayne Pinchbeck, Group General Counsel (May 2023)            Jason Kasler, Group Director of M+A (May 2023)</p> <p><u>Regions</u>            Emily Lofting Kisakye, HRD Europe and NA (May 2023)            Justine Brown, Head of Educational Compliance Spain (May 2023)            Paula Nikotian, Human Resources Director LatAm (May 2023)            Dave Baldwin, CEO Middle East (May 2023)            Lizzie Varley, Education Adviser Middle East (May 2023)</p> <p><u>Independent Reviewers</u>            Lucy Jeffreys, Safeguarding Review Team Leader (May 2023)            Alison Bailey, H&amp;S Reviewer (May 2023)</p>

<b>Audience</b>	
Audience	Group Executive Team Regional Teams Group and Regional Legal Counsel

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

<b>Implementation and Review</b>	
Implementation date	September 2022

<b>Version control</b>			
Issue	Date	Author	Reason
01	04.04.2023	Simon Camby	New document
02	31.07.2023	Simon Camby	Annual Update
03	31.07.2024	Simon Camby	Annual Update, including addition of guidance on education policies
04	30.06.2025	Simon Camby	Annual Update