

Group Policy: Safeguarding 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 Safeguarding Governance and Oversight within Cognita.

Safeguarding commitment

Cognita takes its responsibility for safeguarding all children in its care seriously.

We are committed to promoting the welfare of each child. It is our responsibility to ensure all children have equal rights to be protected from harm and abuse and the right to feel safe. We create and maintain a safe, supportive, and inclusive environment where each child may thrive and develop physically, socially, emotionally and academically.

Safeguarding is our number one priority and this commitment is maintained in every Cognita school, paying attention to local context.

Safeguarding principles

We have seven principles of safeguarding which guide our work and apply to all schools. Whilst the laws and regulations relating to the safeguarding and protection of children will differ in each country, there is an expectation that every Cognita school will intentionally commit to applying these principles.

1. Ensure everyone has a responsibility to support the protection of children.
2. Educate all staff in understanding the categories of abuse and the consequent duty of care they hold to notice any potential harm to children.
3. Empower all staff to act in the best interests of the child to protect them from harm or abuse and take appropriate actions if any concerns arise.
4. Know our students well and offer timely support to those who have experienced, or are at risk of experiencing, an adverse childhood experience.
5. Empower all children to be able to voice their opinion and to share their thoughts and beliefs within the safe environment of the school.
6. Educate and raise awareness in children of how to manage risk, identify harmful behaviours and seek help when needed.
7. Ensure that every adult who works with or for the school is safe to do so.

These principles were devised taking account of the *United Nations Convention on the Rights of the Child* (UNCRC) (see Appendix 1) and the International Task Force on Child Protection (ITFCP) *Expectations for School Communities* (see Appendix 2). Cognita's

standards for safeguarding are at least in line with these expectations and exceed them in many cases.

The Cognita approach to safeguarding

As a diverse global school system, we adopt an approach to safeguarding that makes clear the accountabilities and responsibilities of a range of people, with the view that a coherent system is necessary to ensure effective safeguarding.

There are three pillars to our safeguarding approach in Cognita.

| School ↓ | Region ↓ | Group ↓ |
|--|--|---|
| This is the work that happens every day in each school to create a culture of care and to implement effective safeguarding and child protection 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 safeguarding. | This is the work that takes place across the whole of Cognita to provide governance through independent reviews and to hold regional teams to account for their work in relation to safeguarding. |

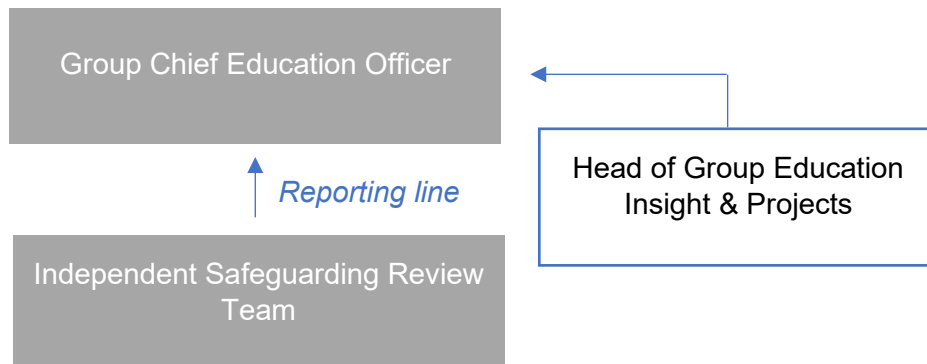
Section 2: Accountability and responsibility

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

| School | Region | Group |
|---|--|--|
| Head of School (Accountability Function) <ul style="list-style-type: none"> Accountable for safeguarding provision and outcomes within their school. Appoints and manages the DSL (or equivalent). Ensures that the school has appropriate resources to execute safeguarding responsibilities. Ensures that there is a strong safeguarding culture within their school. | Regional CEO (Accountability Function) <ul style="list-style-type: none"> Ultimate accountability for safeguarding standards in the region. Chairs three Regional Assurance Board meetings annually. Holds the regional team to account for their safeguarding responsibilities. Approves region's Annual Assurance Report. Ensures that the region has appropriate resources to execute safeguarding responsibilities. | Group Chief Education Officer (Governance Function) <ul style="list-style-type: none"> Sets 'Group Policy: Safeguarding Governance and Oversight'. Chairs Annual Assurance Meeting for each region. Manages the Independent Safeguarding Review process. |
| Designated Safeguarding Lead (DSL) (Accountability Function) For detail regarding the responsibilities of the DSL, please refer to the relevant Regional Safeguarding Policy. | Regional Safeguarding Lead (RSL) (Advisory Function) <ul style="list-style-type: none"> Responsible for promoting the highest standards of safeguarding and child protection within a region. Advises, supports and challenges schools with safeguarding and child protection. Creates regional policy documents. Uses data to intervene, plan training and identify risks. Writes the Annual Assurance Report for safeguarding. Tracks closure of review recommendations. | Head of Group Education Insight & Projects (Governance Function) <ul style="list-style-type: none"> Maintains oversight of safeguarding assurance systems and processes. Determines annual safeguarding review schedule, consulting with key stakeholders. Acts as group-wide contact for matters relating to safeguarding reviews. |
| | Regional HR Director (Advisory Function) <ul style="list-style-type: none"> Responsible for regional Safer Recruitment policy and processes. Engages with review process for Safer Recruitment. Uses data to intervene, plan training and identify risks. Addresses non-compliance issues in Safer recruitment. Writes the Annual Assurance Report for safer recruitment. | Independent Safeguarding Reviewer (Governance Function: Independent Expert) <ul style="list-style-type: none"> Completes Independent Safeguarding Reviews. Completes Independent Safer Recruitment Reviews. Provides constructive feedback to school and regional teams to quality assure and build capacity. |

Accountability and responsibilities of the Group Team

Group Safeguarding Governance and Oversight



Group Chief Education Officer

The Group Chief Education Officer is accountable for setting and providing oversight of the *Group Policy: Safeguarding Governance and Oversight*.

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

- Determine the policy for Safeguarding Governance and Oversight across the Cognita Group;
- Inform regional teams of safeguarding oversight expectations, according to the agreed policy;
- Manage agreed safeguarding governance processes including oversight of all regional Annual Reports and chairing of Annual Assurance Meetings;
- Manage processes relating to the Independent Safeguarding Review Team, including the recruitment of independent reviewers, establishment of the review framework and publication of the annual safeguarding review schedule;
- Take responsibility for any safeguarding recommendations made by the Independent Safeguarding Review Team that impact the entire Cognita Group; and
- Respond to any safeguarding matters escalated to the Group CEO, relating to either a SIRF or the findings from an independent safeguarding 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 safeguarding 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 safeguarding assurance systems and processes on behalf of the Group Chief Education Officer;

- Implement the Annual Safeguarding Review schedule, consulting with appropriate stakeholders, with a drive for continuous improvement;
- Provide support to the Independent Safeguarding Review Team and regional teams regarding safeguarding matters; and
- Provide support to the Group Chief Education Officer with processes related to safeguarding governance.

Role of the Independent Safeguarding Review Team

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

Independent Safeguarding Review Team

The Independent Safeguarding Review Team are responsible for reviewing safeguarding and child protection practice as outlined in published policies and documents. Independent Reviews are conducted across all Cognita schools to:

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

The key responsibilities of the Independent Safeguarding Review Team are to:

- Undertake safeguarding reviews and monitoring visits in line with an agreed deployment schedule (see Appendix 8 for further information regarding the 'tariff days' allocated for each safeguarding review);
- Undertake Safer Recruitment reviews and sampling visits in line with an agreed deployment schedule;
- 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 Safeguarding Review reports should be as follows:

- Head of School
- Regional Safeguarding Lead

- Regional Executive Team members, including: Regional CEO, Director of Education (if applicable), General/Country Manager (if applicable) and Regional HR Directors (for matters related to Safer Recruitment);
- Head of Group Education Insight & Projects (cc'd for the purpose of system oversight); and
- Independent Safeguarding 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 Safeguarding 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 school;
- A concern about organisation-wide safeguarding 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

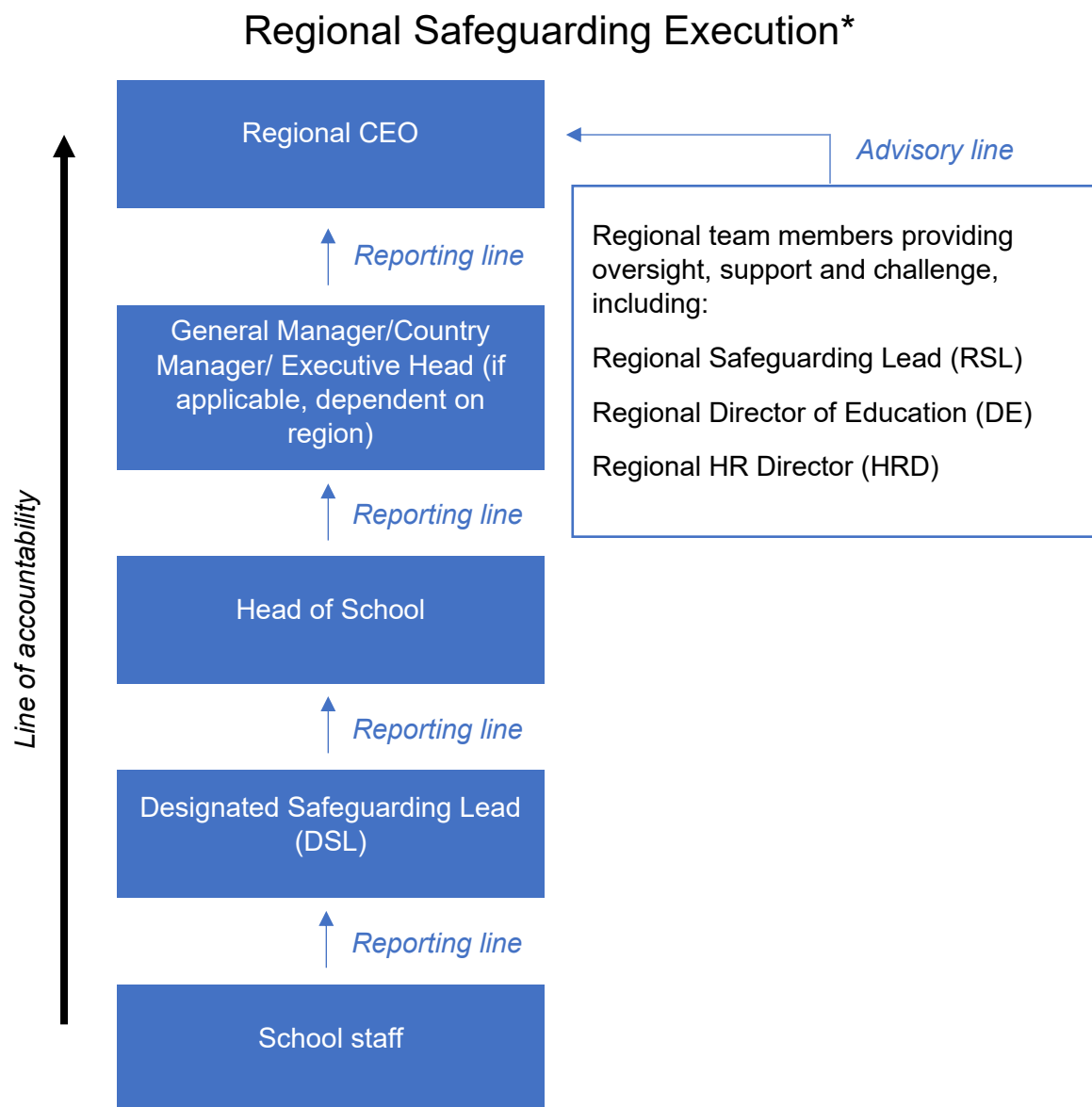
Independent Safeguarding Review Team Leader

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

Their key responsibilities are to:

- Co-ordinate regular meetings of the Independent Safeguarding 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;
- Attend the Annual Governance meetings to provide expert advice, as the designated safeguarding consultant for the Cognita Group;
- Chair bi-annual shared learning meetings, providing safeguarding 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 safeguarding review schedule, allocations and timings.

Accountability and Responsibilities of the Regional Team



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

Regional CEO

The Regional CEO is accountable for the standards of safeguarding 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 safeguarding responsibilities;
- Ensure adequate arrangements to oversee the effective implementation of policies and practices across all Cognita schools and, where appropriate, other sites with students;
- Maintain oversight and hold schools and the regional team to account for their safeguarding 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 Safeguarding Policy and related requirements;
- Ensure that safeguarding related risks within the region are effectively captured by the Regional Risk Register; and
- Ensure that arrangements are in place to address recommendations from safeguarding 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 safeguarding such as outcomes arising from independent reviews in safeguarding matters and school inspections and/or accreditation;
- Support and monitor compliance with internal safeguarding policies and practices, by reviewing and responding to publicised safeguarding review reports for all regional schools;
- Ensure that regional policies, guidance and templates are aligned with the *Group Policy: Safeguarding Governance and Oversight* and with relevant legislation and regulations;
- Oversee the submission of an Annual Assurance Report and provide an executive summary during the Annual Assurance Meeting;
- Ensure effective oversight of the integration of Cognita safeguarding 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 safeguarding oversight, support and challenge, within their region. This may include but is not limited to:

- Regional Director of Education (DE)
- Regional HR Director (HRD)
- Regional Safeguarding Lead (RSL)

The Regional CEO is responsible for ensuring that for any safeguarding related roles, expectations regarding accountability and responsibility for safeguarding are clarified in the respective role profile.

Regional Safeguarding Lead

The Regional Safeguarding Lead (RSL) is responsible for promoting the highest standard of safeguarding and child protection within a region, advising and supporting schools to adopt a self-improving approach to safeguarding practice. The key responsibilities* (allowing for some region-specific variation) of the Regional Safeguarding Lead are to:

- Draft policies, procedures and toolkits that are aligned with the *Group Policy: Safeguarding Governance and Oversight* and with relevant legislation and regulations, giving due consideration to local context;
- Maintain an oversight of safeguarding standards within a region, celebrating and sharing effective practice, and challenging under performance;
- Build capacity through designing and executing systemic approaches to safeguarding leadership, including in relation to the induction of new DSLs;
- Support and advise the DSLs and safeguarding teams in each school, including with referrals to external agencies, risk assessments and action planning;
- Undertake investigations and internal case reviews, as required;
- Identify training needs across all schools 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 Safeguarding 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 Safeguarding Lead please refer to the relevant local Regional Safeguarding Policy.

Regional Human Resources Director

For information regarding the responsibilities of the Regional Human Resources Director [in relation to safeguarding] please refer to the *Group Policy: Safer Recruitment*, where full detail is provided.

Accountability and Responsibilities of the School Team

Head of School

The Head of School, at each Cognita school, is accountable for the standards of safeguarding and child protection at their school.

The key responsibilities of the Head of School in relation to safeguarding 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 safeguarding responsibilities;
- Ensure that the content of the school policy is lived through the implementation of a culture of care, supported by known and understood systems and processes;
- Ensure that a strong safeguarding culture and effective safeguarding practice is implemented within their school;
- Ensure accurate and timely reporting to the regional team and external agencies;
- Recruit and manage the school Designated Safeguarding Lead (DSL)*, ensuring that at least one DSL is employed by the school at all times; and
- Own any improvements or recommendations detailed within their external safeguarding review report.

For information regarding the responsibilities of the Head of School in relation to Safer Recruitment, please refer to the *Group Policy: Safer Recruitment*, where full detail is provided.

Designated Safeguarding Lead

The role of the DSL is outlined in the relevant local Regional Safeguarding Policy.

NB: In Spain the term Child Protection Coordinator (CPC) is used in place of the term Designated Safeguarding Lead (DSL).

NB. Please refer to Appendix 7 for a visual summary of how responsibility for safeguarding is shared with the Cognita system.

Section 3: Safeguarding meetings

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

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

In addition to the above, the Regional Safeguarding Leads (RSLs) meet four times each year; as part of the 'Global Safeguarding 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 with 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
- Group 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 Safeguarding Review process and themes arising from group-wide oversight

Chairing

The meeting shall be chaired by the Lead Independent Safeguarding Reviewer.

Frequency

Twice during the year

Duration

90 mins

People

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

Region:

- Regional Safeguarding Lead/s from all regions
- Translator if required

Independent:

- Independent Safeguarding 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 safeguarding practice
5. Regulation, legislation or guidance related to safeguarding

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 Safeguarding Review Process

Purpose

Independent Safeguarding Reviews are conducted across all Cognita schools to:

- Review safeguarding and child protection practice, including in relation to relevant statutory and/or regulatory requirements;
- Exercise effective governance oversight in relation to safeguarding;
- 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 external Independent Reviewers. 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 safeguarding reviewers commissioned by Cognita forms the Independent Safeguarding Review Team and is led by the Independent Safeguarding Review Team Leader.

Safeguarding model

The diagram below indicates the model used by the safeguarding review team.



Areas for evaluation

The following areas will be evaluated during each Safeguarding Review:

- Safeguarding culture
- Leadership of safeguarding
- Student voice
- Child welfare and protection
- Knowledge, skills and awareness of adults
- Policy implementation, systems and practice
- Curriculum and learning
- Early Years (if applicable)*

*Additional criteria will be considered during a safeguarding review of schools with registered provision in England, in accordance with local regulations.

Within each area of evaluation there may be multiple areas of practice that the Independent Reviewer will consider. Each area of practice will be evaluated against the criteria below:

| | |
|--|--|
| | Safeguarding standards have not been implemented and require immediate action. Any item graded as red will have an 'action to meet regulations or policy' |
| | Safeguarding standards have been implemented but require further development to ensure that Cognita policy and guidance for the region are fully met, or to become fully embedded. |
| | Safeguarding standards have been met and comply with policy and guidance on best practice for the region. Areas of leading practice, which others may learn from, may be identified in the report. |

Reporting

Each Independent Safeguarding 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

Cognita schools outside the UK receive a full Independent Safeguarding Review every two academic years. A Year A/Year B approach is followed.

Cognita schools in the UK receive a full Independent Safeguarding Review on an annual basis, due to the local regulatory context.

The following Year A/Year B model is used:

| Year A | Year B* |
|--|--|
| <p>In Year A, the school will:</p> <ul style="list-style-type: none"> Engage in an Independent Safeguarding Review with a member of the Independent Safeguarding Review Team. | <p>In Year B, the school will:</p> <ul style="list-style-type: none"> Engage in a virtual review with an Independent Safeguarding Reviewer. <p>or</p> <ul style="list-style-type: none"> Where the Year A review identified concerns or matters to be addressed, the school may receive an 'in person' review. |

*Note that in Year B the school will also engage in a Safeguarding Peer Review that is arranged by the Regional Safeguarding Lead. This process is designed to support Knowledge Animation and Building Capacity. This Peer Review is not a formal part of the Independent Review process. However, Independent Reviewers will likely look at the outcomes from this peer review to inform their broader evaluation of the school.

For further information about the peer review process, please refer to Appendix 10. For further information about the virtual review process, please refer to Appendix 11.

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 Safeguarding Review Process

For further information regarding the stages of the Independent Safeguarding Review process please refer to Appendix 12.

School self-evaluation

Each school is expected to complete a self-evaluation exercise, using an agreed template, prior to the Independent Safeguarding Review. This provides the Independent Reviewer with an insight into the work of the school and their current evaluation of practice.

Follow up to the Safeguarding Review

It is the responsibility of the school leaders (Head of School and DSL) to follow up on the recommendations from the Independent Safeguarding Review. The Regional Safeguarding 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 Safeguarding Review Team to check for progress against the recommendations.

Triggers for a Safeguarding Review (out of cycle)

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

- Any evidence-based concern (triggered by Regional Safeguarding Lead, Regional Director of Education or Regional CEO)
- Significant change of staff (especially Head of School or DSL)
- Specific accreditation/inspection outcome (if applicable)
- Serious parental complaint linked to safeguarding
- Serious behavioural incidents or events over time deemed to be a serious safeguarding risk
- Serious whistleblowing or HR concern

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 safeguarding 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 safeguarding 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 safeguarding of students in their school and establishing an appropriate safeguarding culture;
- Concerns about the competence or training of the Head of School in relation to safeguarding;
- 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 'Safeguarding Escalation'.
4. The escalation form is acknowledged with the Independent Safeguarding Reviewer and appropriate action is taken with the Cognita regional team.

Recommendations for the Regional Team

There may be instances when an Independent Safeguarding 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 Safeguarding Reviewer within the Regional Review Overview Report. These

recommendations should not be recorded on the individual school Safeguarding Review Report. Recommendations can be closed by the Regional Safeguarding Lead, with oversight from the Regional CEO.

The Regional Safeguarding Lead is expected to show how all recommendations for Cognita are being addressed or 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 Safeguarding Lead
- Regional HR Director
- 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 Safeguarding 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 Safeguarding Lead an informal post-review meeting may be scheduled with up to two members of the Independent Safeguarding Review Team following the end of the Independent Safeguarding Review Period.

Group-wide recommendations for Cognita

Any safeguarding recommendations made by the Independent Safeguarding Review Team 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 Safeguarding Review, it is expected that every effort is made by the Independent Safeguarding Reviewer to deal with this directly with the school. Clear, 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 safeguarding 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 Safeguarding Review Cycle

The annual cycle of independent safeguarding reviews, running from September to August.

Annual Safeguarding Review Schedule

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

Child Protection

Child protection is part of the safeguarding process. Child protection focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

Cognita group

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

Designated Safeguarding Lead (DSL)

A staff member employed at a Cognita school with specific responsibility for safeguarding practice within their school.

NB: The staff member executing this role is referred to as the Child Protection Coordinator (CPC) in Spain.

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: Safeguarding Governance and Oversight

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

Independent Safeguarding Review Process

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

Independent Safeguarding Review Team

The team of active safeguarding reviewers commissioned by Cognita forms the Independent Safeguarding Review Team.

Independent Safeguarding Review Team Leader

The chair of the Independent Safeguarding 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 Safeguarding 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 in relation to safeguarding.

Regional Review Overview

An overview report written by the Independent Safeguarding 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 safeguarding risks within the region. The safeguarding risks highlighted by each school in their risk register should be considered if creating and maintaining a Regional Risk Register.

Safeguarding

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. Safeguarding involves:

- protecting children from abuse and maltreatment;
- preventing harm to children's health or development;
- ensuring children grow up with the provision of safe and effective care; and
- taking action to enable all children and young people to have the best outcomes.

Safer Recruitment

Safer recruitment is a set of practices employed to ensure that staff and volunteers are suitable to work with children and young people.

Safer Recruitment Sampling

A part of the Safer Recruitment Review process involving members of the Independent Safeguarding Review Team reviewing recruitment files held at school level. The purpose of this sampling is to assess schools' compliance with regional Safer Recruitment policies.

SCR Tracker

The SCR Tracker (SCRT) is an online system for schools to manage their Single Central Record.

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 - UN Convention on the Rights of the Child



| | | | |
|--|--|---|--|
|  <p>1 DEFINITION OF A CHILD</p> | <p>All children have all these rights, no matter who they are, where they live, what language they speak, what their religion is, what they think, what they look like, if they are a boy or girl, if they have a disability, if they are rich or poor, and no matter who their parents or families are or what their parents or families believe or do. No child should be treated unfairly for any reason.</p> |  <p>3 BEST INTERESTS OF THE CHILD</p> | <p>When adults make decisions, they should think about how their decisions will affect children. All adults should do what is best for children. Governments should make sure children are protected and looked after by their parents, or by other people when this is needed. Governments should make sure that people and places responsible for looking after children are doing a good job.</p> |
|  <p>4 MAKING RIGHTS REAL</p> | <p>Governments must do all they can to make sure that every child in their countries can enjoy all the rights in this Convention.</p> |  <p>5 FAMILY GUIDANCE AS CHILDREN DEVELOP</p> | <p>Governments should let families and communities guide their children so that, as they grow up, they learn to use their rights in the best way. The more children grow, the less guidance they will need.</p> |
|  <p>6 LIFE, SURVIVAL AND DEVELOPMENT</p> | <p>Every child has the right to be alive. Governments must make sure that children survive and develop in the best possible way.</p> | | |
|  <p>7 NAME AND NATIONALITY</p> | <p>Children must be registered when they are born and given a name which is officially recognized by the government. Children must have a nationality (belong to a country). Whenever possible, children should know their parents and be looked after by them.</p> |  <p>8 IDENTITY</p> | <p>Children have the right to their own identity – an official record of who they are which includes their name, nationality and family relations. No one should take this away from them, but if this happens, governments must help children to quickly get their identity back.</p> |
|  <p>9 KEEPING FAMILIES TOGETHER</p> | <p>Children should not be separated from their parents unless they are not being properly looked after – for example, if a parent hurts or does not take care of a child. Children whose parents don't live together should stay in contact with both parents unless this might harm the child.</p> |  <p>10 CONTACT WITH PARENTS ACROSS COUNTRIES</p> | <p>If a child lives in a different country than their parents, governments must let the child and parents travel so that they can stay in contact and be together.</p> |
| | |  <p>11 PROTECTION FROM KIDNAPPING</p> | <p>Governments must stop children being taken out of the country when this is against the law – for example, being kidnapped by someone or held abroad by a parent when the other parent does not agree.</p> |
|  <p>12 RESPECT FOR CHILDREN'S VIEWS</p> | <p>Children have the right to give their opinions freely on issues that affect them. Adults should listen and take children seriously.</p> |  <p>13 SHARING THOUGHTS FREELY</p> | <p>Children have the right to share freely with others what they learn, think and feel, by talking, drawing, writing or in any other way unless it harms other people.</p> |
| | |  <p>14 FREEDOM OF THOUGHT AND RELIGION</p> | <p>Children can choose their own thoughts, opinions and religion, but this should not stop other people from enjoying their rights. Parents can guide children so that as they grow up, they learn to properly use this right.</p> |
|  <p>15 SETTING UP OR JOINING GROUPS</p> | <p>Children can join or set up groups or organisations, and they can meet with others, as long as this does not harm other people.</p> |  <p>16 PROTECTION OF PRIVACY</p> | <p>Every child has the right to privacy. The law must protect children's privacy, family, home, communications and reputation (or good name) from any attack.</p> |
| | |  <p>17 ACCESS TO INFORMATION</p> | <p>Children have the right to get information from the Internet, radio, television, newspapers, books and other sources. Adults should make sure the information they are getting is not harmful. Governments should encourage the media to share information from lots of different sources, in languages that all children can understand.</p> |
|  <p>18 RESPONSIBILITY OF PARENTS</p> | <p>Parents are the main people responsible for bringing up a child. When the child does not have any parents, another adult will have this responsibility and they are called a "guardian". Parents and guardians should always consider what is best for that child. Governments should help them. Where a child has both parents, both of them should be responsible for bringing up the child.</p> |  <p>19 PROTECTION FROM VIOLENCE</p> | <p>Governments must protect children from violence, abuse and being neglected by anyone who looks after them.</p> |
| | |  <p>20 CHILDREN WITHOUT FAMILIES</p> | <p>Every child who cannot be looked after by their own family has the right to be looked after properly by people who respect the child's religion, culture, language and other aspects of their life.</p> |
|  <p>21 CHILDREN WHO ARE ADOPTED</p> | | <p>When children are adopted, the most important thing is to do what is best for them. If a child cannot be properly looked after in their own country – for example by living with another family – then they might be adopted in another country.</p> | |

| | | | | | |
|---|---|---|---|---|---|
|  <p>22 REFUGEE CHILDREN</p> | Children who move from their home country to another country as refugees (because it was not safe for them to stay there) should get help and protection and have the same rights as children born in that country. |  <p>23 CHILDREN WITH DISABILITIES</p> | Every child with a disability should enjoy the best possible life in society. Governments should remove all obstacles for children with disabilities to become independent and to participate actively in the community. |  <p>24 HEALTH, WATER, FOOD, ENVIRONMENT</p> | Children have the right to the best health care possible, clean water to drink, healthy food and a clean and safe environment to live in. All adults and children should have information about how to stay safe and healthy. |
|  <p>25 REVIEW OF A CHILD'S PLACEMENT</p> | Every child who has been placed somewhere away from home - for their care, protection or health - should have their situation checked regularly to see if everything is going well and if this is still the best place for the child to be. |  <p>26 SOCIAL AND ECONOMIC HELP</p> | Governments should provide money or other support to help children from poor families. |  <p>27 FOOD, CLOTHING, A SAFE HOME</p> | Children have the right to food, clothing and a safe place to live so they can develop in the best possible way. The government should help families and children who cannot afford this. |
|  <p>28 ACCESS TO EDUCATION</p> | Every child has the right to an education. Primary education should be free. Secondary and higher education should be available to every child. Children should be encouraged to go to school to the highest level possible. Discipline in schools should respect children's rights and never use violence. |  <p>29 AIMS OF EDUCATION</p> | Children's education should help them fully develop their personalities, talents and abilities. It should teach them to understand their own rights, and to respect other people's rights, cultures and differences. It should help them to live peacefully and protect the environment. | | |
|  <p>30 MINORITY CULTURE, LANGUAGE AND RELIGION</p> | Children have the right to use their own language, culture and religion - even if these are not shared by most people in the country where they live. |  <p>31 REST, PLAY, CULTURE, ARTS</p> | Every child has the right to rest, relax, play and to take part in cultural and creative activities. |  <p>32 PROTECTION FROM HARMFUL WORK</p> | Children have the right to be protected from doing work that is dangerous or bad for their education, health or development. If children work, they have the right to be safe and paid fairly. |
|  <p>33 PROTECTION FROM HARMFUL DRUGS</p> | Governments must protect children from taking, making, carrying or selling harmful drugs. |  <p>34 PROTECTION FROM SEXUAL ABUSE</p> | The government should protect children from sexual exploitation (being taken advantage of) and sexual abuse, including by people forcing children to have sex for money, or making sexual pictures or films of them. |  <p>35 PREVENTION OF SALE AND TRAFFICKING</p> | Governments must make sure that children are not kidnapped or sold, or taken to other countries or places to be exploited (taken advantage of). |
|  <p>36 PROTECTION FROM EXPLOITATION</p> | Children have the right to be protected from all other kinds of exploitation (being taken advantage of), even if these are not specifically mentioned in this Convention. |  <p>37 CHILDREN IN DETENTION</p> | Children who are accused of breaking the law should not be killed, tortured, treated cruelly, put in prison forever, or put in prison with adults. Prison should always be the last choice and only for the shortest possible time. Children in prison should have legal help and be able to stay in contact with their family. | | |
|  <p>38 PROTECTION IN WAR</p> | Children have the right to be protected during war. No child under 15 can join the army or take part in war. |  <p>39 RECOVERY AND REINTEGRATION</p> | Children have the right to get help if they have been hurt, neglected, treated badly or affected by war, so they can get back their health and dignity. |  <p>40 CHILDREN WHO BREAK THE LAW</p> | Children accused of breaking the law have the right to legal help and fair treatment. There should be lots of solutions to help these children become good members of their communities. Prison should only be the last choice. |
|  <p>41 BEST LAW FOR CHILDREN APPLIES</p> | If the laws of a country protect children's rights better than this Convention, then those laws should be used. |  <p>42 EVERYONE MUST KNOW CHILDREN'S RIGHTS</p> | Governments should actively tell children and adults about this Convention so that everyone knows about children's rights. |  <p>43-54 HOW THE CONVENTION WORKS</p> | These articles explain how governments, the United Nations - including the Committee on the Rights of the Child and UNICEF - and other organisations work to make sure all children enjoy all their rights. |

Appendix 2 - International Task Force on Child Protection (ITFCP) Expectations for School Communities

The International Taskforce on Child Protection (ITFCP) Expectations for School Communities were updated in December 2021. Working in consultation with school evaluation, accreditation and inspection agencies operating within national and international contexts, the ITFCP Accountability Committee achieved broad agreement for the adoption of updated recommendations to be included within each agency's framework for school evaluation.

The 2021 Expectations are based on the following principles and the United Nations Convention on the Rights of the Child (UNCRC):

- All children have equal rights to be protected from harm and abuse.
- Everyone has a responsibility to support the protection of children.
- All schools have a responsibility to build a community that values diversity, equity, and inclusion for each child.
- All schools have a duty of care to children enrolled in the school and those who are affected by the operations of the school.
- All actions on child protection are taken with the best interests of the child, which are paramount.

The expectations of the ITFCP fall under four areas:

(1) Policies

The school complies with legal and ethical requirements for the treatment of children within the country where it is based while adhering to international expectations for the rights of children as stated in the United Nations Convention on the Rights of the Child (UNCRC) and published at the International Center for Missing and Exploited Children Education Portal (ICMEC.org).

A values statement on child rights, aligned with the responsibilities set out in the United Nations Convention on the Rights of the Child (UNCRC), has been developed and formally adopted by the school.

The school has a policy, approved by the owners/governors, that describes the school's commitment to a culture of student safety and well-being, thereby preventing harm to children and to responding appropriately if children are harmed or if allegations of harm to children are made. The school regularly reviews and refines the policy and seeks ongoing community consultation which includes student input (voice) and empowers student self-advocacy (agency).

The school has developed and adopted an appropriate definition of child abuse -including physical abuse, emotional abuse, sexual abuse, sexual exploitation, neglect, commercial exploitation, and inappropriate behaviour of children towards other children which is informed by international standards as agreed by the International Taskforce on Child Protection (Education Portal - International Centre for Missing & Exploited Children

(ICMEC.org) and is cognizant of the legal context of the country where the school is based.

School safeguarding and child protection policies are supported by operational procedures, which are revised as needed, widely shared with the school community and systematically embedded in all aspects of school life, including strategic planning, budgeting, recruitment, program management, performance management, resource procurement, partner agreements, risk management, technology and management systems.

The school's policies forbid the use of non-disclosure or confidentiality agreements which prevent transparent sharing of information about child safeguarding concerns, complaints, inquiries and investigations.

(2) Personnel

The school has clearly defined leadership responsibilities at the governance, leadership and operation/execution levels for child safeguarding and welfare; designated leads at each level undertake formal training on child safeguarding and duty of care.

Based on its policy, the school has developed and adopted written guidelines (code of conduct) for appropriate and inappropriate behaviour of adults towards children, children towards adults, and children towards other children. All faculty, staff, volunteers, governing board members and owners, outside contractors, parents, and students annually review and affirm that they have read, understood, and will abide by the code of conduct. The code of conduct includes reference to behaviour on and off school premises.

The school has recruitment policies and rigorous operational procedures to ensure all adults who interact with children (including employees, volunteers and governing board members/owners) are suitable to work safely with and protect the students in their care (including reference verification with previous employers and criminal police checks, as appropriate).

(3) Curriculum, programmes and training

The school has formal age-appropriate safeguarding learning programmes for students, which are referred to in the school's teaching and learning policies, informed by student feedback, connected to the school's social-emotional curriculum and delivered by trained personnel. Topics include personal safety, online safety, healthy relationships, comprehensive sexuality education, all forms of peer-on-peer abuse (including bullying) and grooming.

The school offers peer mentoring and/or buddy systems and provides appropriate counselling support for students.

The school regularly consults with and empowers students to have agency and voice in a range of areas related to school life, including the school's safeguarding curriculum and programmes.

School volunteers, contractors, faculty and staff undergo regular, systematic professional training on student safeguarding in all educational environments for which they are responsible, including boarding facilities, homestay, residential arrangements, excursions, trips, and student exchanges. Topics include child abuse prevention, recognition, intervention, and reporting.

(4) Systems and environment

The school provides students with multiple avenues to report concerns. It has procedures in place for centralized reporting of suspected or disclosed maltreatment or abuse, including historical abuse, by volunteers, contractors, faculty and staff. The procedures identify actions to be taken, which include informing appropriate school and local authorities, i.e., law enforcement as appropriate, and are widely shared with the school community.

Reports of suspected or disclosed abuse and resulting actions taken by the school are securely archived in keeping with applicable law, regardless of the conclusions reached, and reviewed periodically for identification of possible patterns of inappropriate behaviour.

The school develops and maintains meaningful and effective relationships with external organizations and agencies that are able to provide contextually appropriate support and advice on matters related to child protection and welfare.

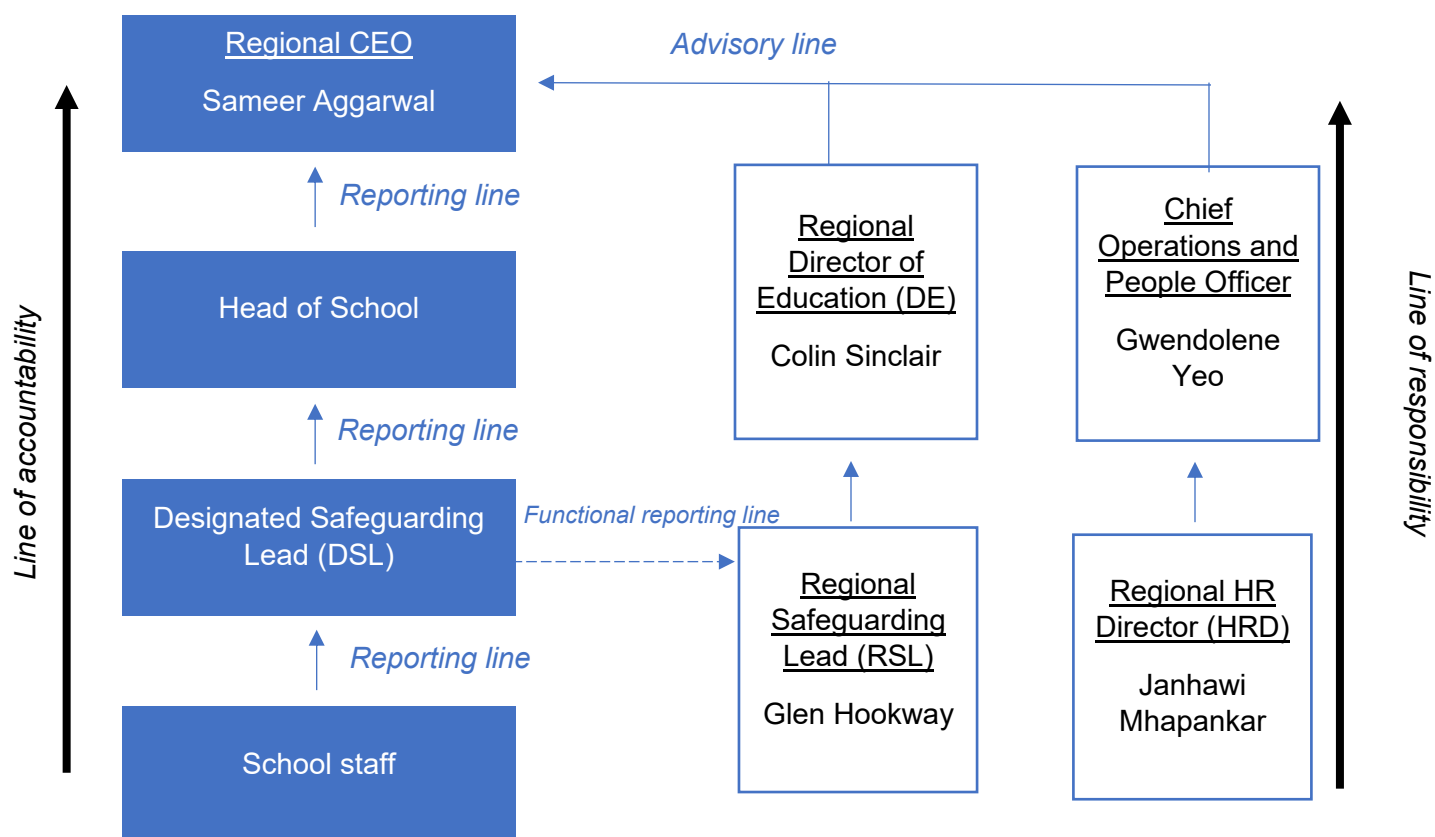
The school has established regular and meaningful partnership opportunities with families and guardians to learn from them about children's experiences and to help them to protect their own children and support the school's child protection efforts.

Building and facility design, layout, designation, access, use, security and supervision enable and support effective child safety and protection

The school has management and technology systems and appropriate accountability to monitor, identify and share issues related to child safeguarding allegations and complaints.

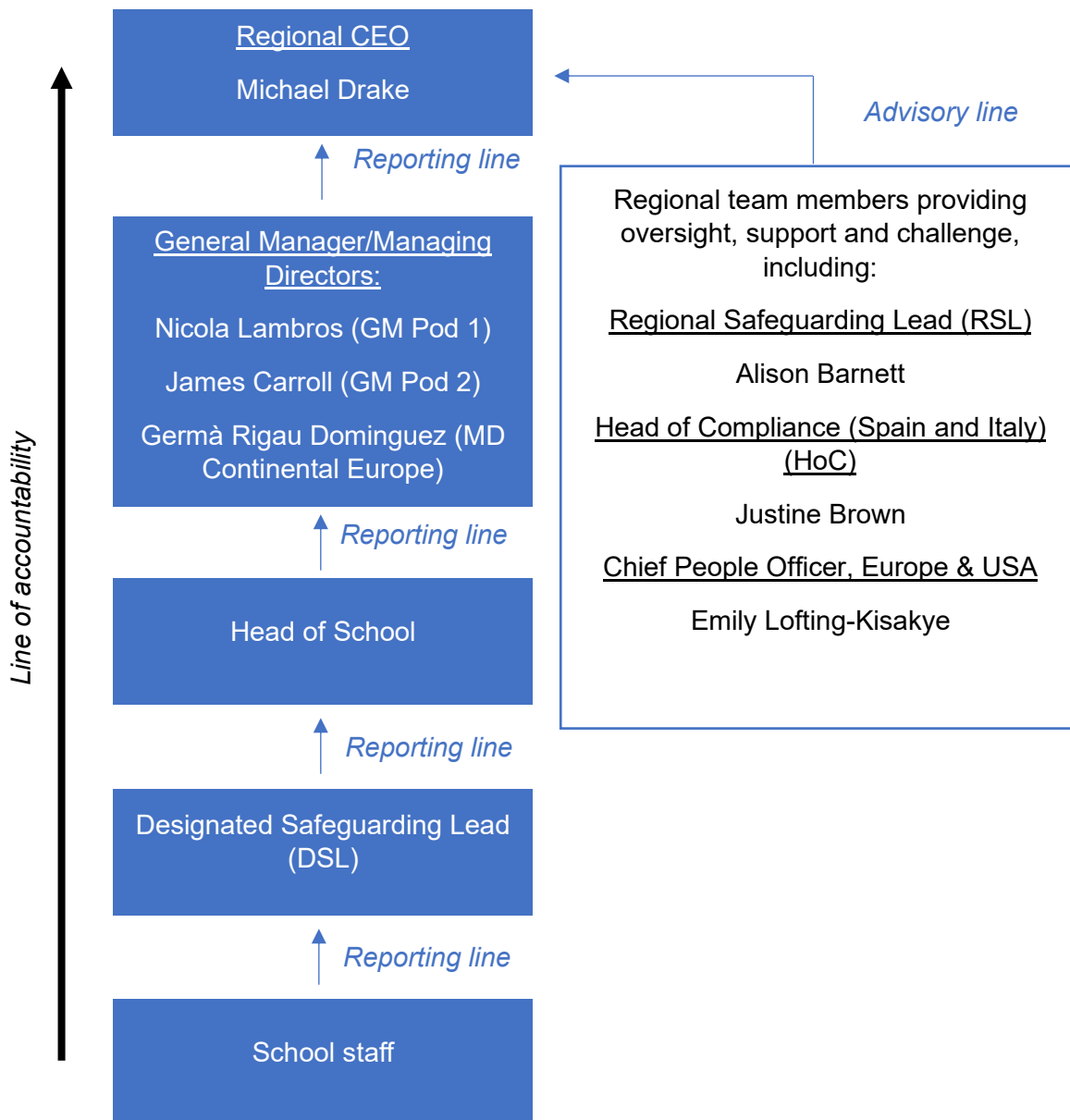
Appendix 3 - Regional Safeguarding Execution Chart: Asia

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 4 - Regional Safeguarding 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 5 - Regional Safeguarding Execution Chart: Latin America

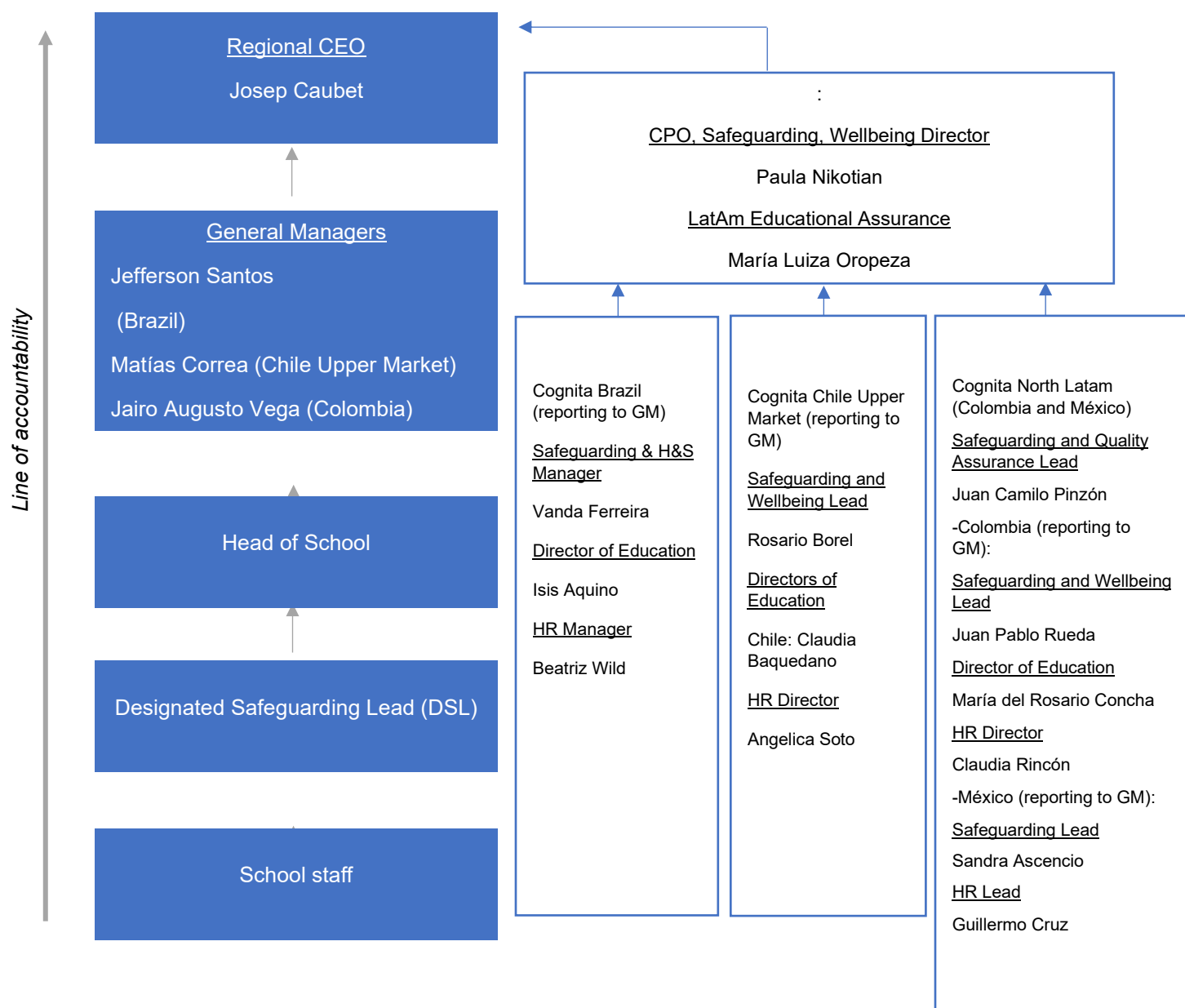
The roles and staff members shown below are correct as of June 2025. This structure chart will be updated within the next scheduled review of this document. As post-holders may change from time to time, it is recommended that the regional team are consulted directly if you have any queries in relation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

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

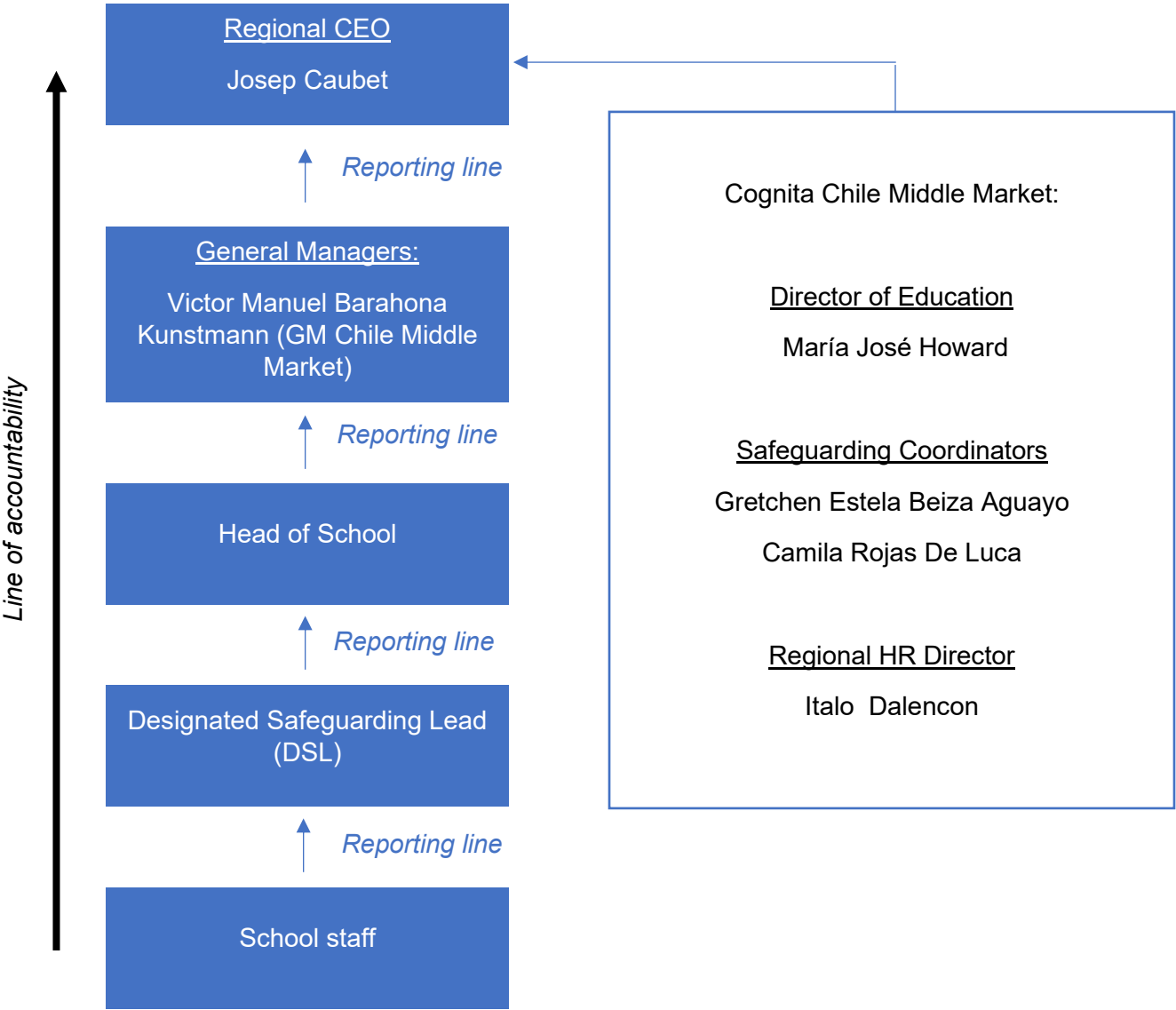
- San Francisco Javier Huechuraba
- Dunalastair School

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 Safeguarding Execution: Chile (Upper Market), Brazil, Colombia and Mexico

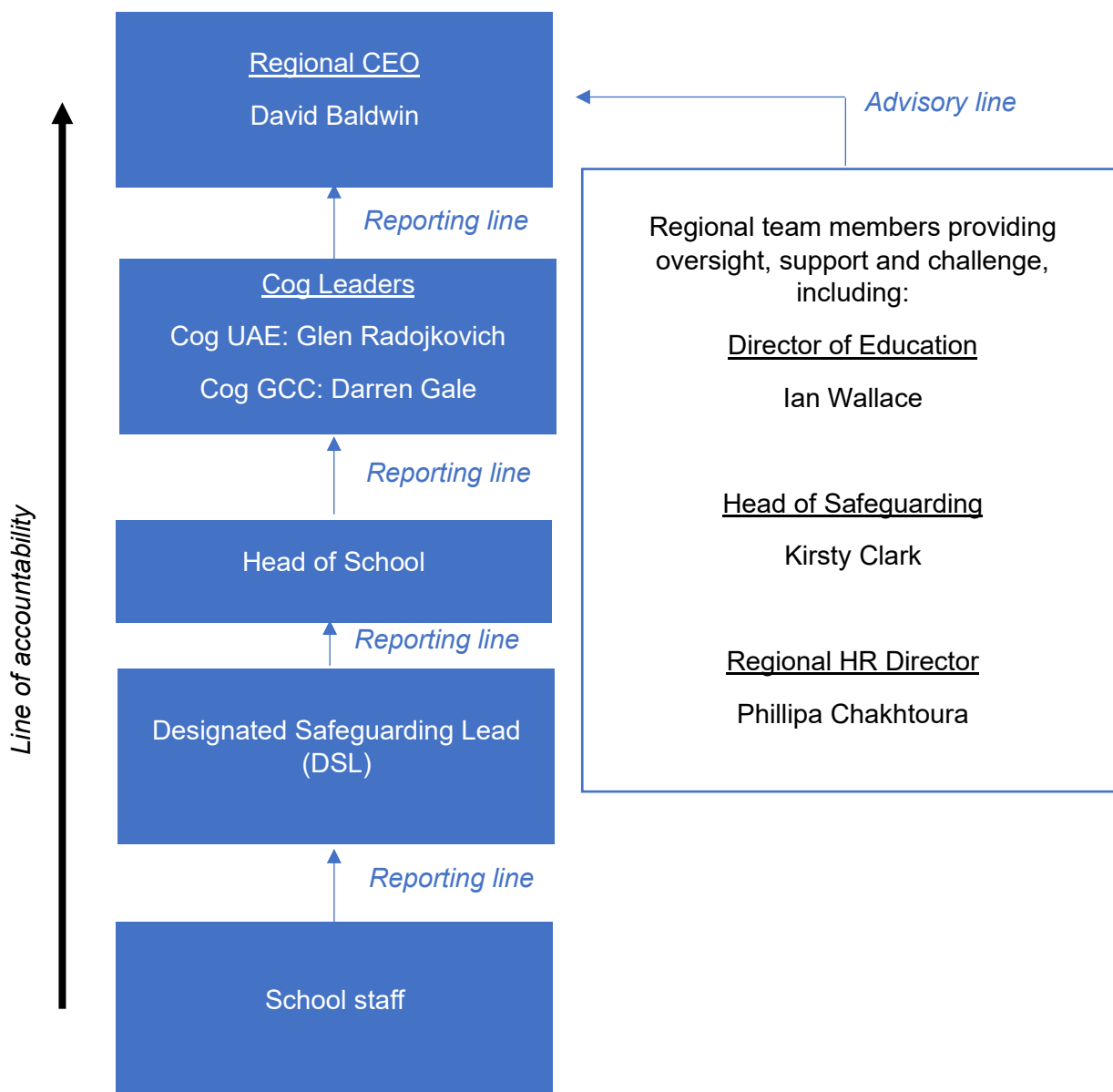


Regional Safeguarding Execution: Chile (Middle Market)



Appendix 6 - Regional Safeguarding 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 7 - The Bigger Picture of Safeguarding within Cognita

SCHOOLS

The Head of School, at each Cognita school, is accountable for the standards of safeguarding and child protection at their school.

- Reporting of termly data
- SIRF Reporting
- Safer Recruitment Sampling
- Experienced Heads
- Training
- DSLs
- External Safeguarding Reviews

REGIONAL TEAM

The regional team is responsible for overseeing safeguarding arrangements within their region.

- Regional HR Director taking responsibility for Safer Recruitment
- RSLs
- Submitting an Annual Report
- Managing SIRFs
- Monitoring termly data
- Regional Safeguarding Board meetings

SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN IS EVERYONE'S RESPONSIBILITY

INDEPENDENT SAFEGUARDING REVIEW TEAM

The Independent Safeguarding Review Team are responsible for reviewing safeguarding and child protection practice across all Cognita schools against an agreed framework.

- Completing two annual Safer Recruitment reviews
- Completing school reviews
- Safer Recruitment Sampling
- Regular team meetings
- Team Leader with additional responsibilities
- 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: Safeguarding Governance and Oversight on behalf of the Group CEO.

- Annual Governance Meetings
- Scheduling of External Safeguarding Reviews
- Review of the Cognita safeguarding policy
- Annual reporting to the board

Appendix 8 - Tariff days

A tariff system is used for the allocation of time that an Independent Safeguarding Reviewer requires at each Cognita school, this is based on student roll. As a guide:

| | |
|---------------------|-----------------|
| 1 – 300 students | 1 reviewer day |
| 301 – 1499 students | 2 reviewer days |
| 1500+ students | 3 reviewer days |

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.

Appendix 9 - 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 |
|------------------------------|--|---|---|
| Medical and first aid | Medical and first aid policy scope, including: <ul style="list-style-type: none"> ○ Policy to practice. ○ Policy revision within a timely period. ○ Policy access platform to ensure availability and version control. ○ Sampling of training matrix against the commitment within the policy (and against the regional training guide). | <ul style="list-style-type: none"> ○ Policy to practice evaluation. Information sharing: <ul style="list-style-type: none"> ○ Check how information about medical needs, including care plans, are shared with staff. Sampling health care plans for range of needs, including: <ul style="list-style-type: none"> ○ most significant & consider how these | <ul style="list-style-type: none"> ▪ <i>Detailed medical oversight (scope of practice to maintain legal compliance including templates used by schools).</i> ▪ <i>Regional statistic trends and evaluation.</i> ▪ <i>Data protection in relation to medical records.</i> |

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

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

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| | | <ul style="list-style-type: none"> ○ Safe sleep protocols in place and followed. | |
| Swimming pools | <p>Management</p> <ul style="list-style-type: none"> ○ Evaluating the suitability of policy to practice alongside written protocols for school use of the pool and any hired arrangements. ○ 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). <p>Competency:</p> <ul style="list-style-type: none"> ○ Lifeguards – training validity vs policy. ○ Instructors – training for those teaching being evaluated against local standards and activities. <p>Facilities:</p> <ul style="list-style-type: none"> ○ Arrangements for water quality testing – daily testing (pH/Chlorine/temperature), scope of formal sampling (bacteriological etc). ○ Facilities – general condition evaluated during the pool tour, alongside security, etc. | | <p><i>Adventurous swimming pool activities</i></p> <ul style="list-style-type: none"> ○ <i>e.g. use of specialist facilities</i> <p><i>Swimming facilities off-site</i></p> <p><i>Pool plant operations</i></p> <ul style="list-style-type: none"> ○ <i>Chemical dosing</i> ○ <i>Condition of plant rooms</i> <ul style="list-style-type: none"> ▪ <i>Legal checking of Pool Safety Operating Procedures</i> ▪ <i>Checking correct 'origin' policies for local or national regulatory bodies</i> ▪ <i>Checking practice vs specific local training and competency requirements.</i> |

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 10 - Peer Review Process

Purpose of the Peer Review

The Peer Review is conducted to:

- Provide an external 'critical friend' view in the year where there is no full in-person Independent Safeguarding Review
- Build safeguarding leadership capacity within schools and within the region
- Share effective practice
- Identify areas for development

Responsibility and timing

It is the responsibility of the Regional Safeguarding Lead to put arrangements in place for peer review and to agree who the peer reviewers will be for each school. Where possible, the Peer Review should take place before the virtual review.

Time commitment

The Regional Safeguarding Lead will confirm the time commitment. This will never be more than one day.

Templates

The Peer Review is intended to be focused on in-school conversation and evaluation. In order to support this process, the host school should send the peer reviewer a brief self-evaluation before the date of the review. This self-evaluation should include:

An outline of the progress made against compliance actions and developmental recommendations from the last review

An outline of their focus points/priorities for safeguarding during this academic year

Following the review, the peer reviewer should complete and circulate a report, according to an agreed template. Information regarding how to access the Peer Review Report template can be found on the Group Assurance Teams site.

Appendix 11 - Virtual review Process

Purpose of the Virtual Review

The review is conducted to:

- Provide an external 'touch point' with the Independent Safeguarding Review Team
- Review the progress made against the recommendations from the previous Independent Safeguarding Review

Choice of reviewer

Where possible, the Independent Safeguarding Reviewer leading the virtual review will be the reviewer that visited the school for the last on-site review, noting that this will not always be possible.

Time commitment

It is anticipated that the virtual review will last up to 3 hours (additional time may be allocated for schools with over 1500 pupils on roll) and will be conducted using the school's online platform with the host school being responsible for sending the invite to the Independent Safeguarding Reviewer.

The reviewer will always meet with the Head of School and DSL at a minimum. Other participants in the meeting will be guided by the reviewer and linked to the agenda and content for the meeting.

Documentation

The host school should send their completed Light-touch Safeguarding Review: Self-evaluation form template to the safeguarding reviewer ahead of the meeting, focusing on the recommendations from the last review. Information regarding how to access the Light-touch Safeguarding Review: Self-evaluation form template can be found on the Group Assurance Teams site.

The host school should also send a copy of the self-evaluation from their peer review and report from the peer reviewer to the safeguarding reviewer undertaking the virtual review.

The safeguarding reviewer will send an agenda for the virtual review meeting at least one week in advance of the meeting. The safeguarding reviewer will send a short report following the virtual review.

Appendix 12 - Stages of the Independent Review Process

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

Appendix 13 - Safeguarding Data Reporting

We collect data directly from schools at three points in the year to give a group wide view of safeguarding. Each school has their in-school safeguarding management system.

The data is collected via the Forsta platform (direct survey to each school) and visualised within the Intelligent Accountability Dashboard.

| Data Reporting Period 1 | | | | | Data Reporting Period 2 | | | | Data Reporting Period 3 | | |
|--|-----|-----|-----|-----|--|-----|-----|-----|--|-----|-----|
| Data is submitted during the months of November and December | | | | | Data is submitted during the months of March and April | | | | Data is submitted during the months of June and July | | |
| Includes data from: | | | | | Includes data from: | | | | Includes data from: | | |
| AUG | SEP | OCT | NOV | DEC | JAN | FEB | MAR | APR | MAY | JUN | JUL |

Group wide responsibility for ensuring that there is an effective system for collecting, analysing and providing insight in relation to this data rests with the Head of Group Education Insight & Projects.

Responsibility for ensuring that Cognita schools understand and complete this survey sits with the relevant Regional Safeguarding Lead.

| Ownership and consultation | |
|-----------------------------------|--|
| Document sponsor | Group Chief Education Officer |
| Issuing authority | Cognita Holdings Limited |
| Operational 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> <u>Asia:</u> Eric Van Den Berg, Regional CEO Asia (July 2022) Fiona Dixon, Regional Safeguarding Lead Asia (July 2022) Andy Hancock, Director of Education Asia (July 2022)</p> <p><u>Europe:</u> Michael Drake, Regional CEO Europe (July 2022) Alison Barnett, Regional Safeguarding Lead Europe (July 2022) Nicola Lambros, Director of Education Europe (July 2022) Christopher Eversden, Assistant Director of Education (July 2022) Justine Brown, Head of Educational Compliance Spain (July 2022) Jamie Delaney, Legal Counsel Europe (August 2022)</p> <p><u>LatAm:</u> Josep Caubet, Regional CEO LatAm (July 2022) Victor Manuel Barahona Kunstmann, General Manager Cognita Chile (July 2022) Luis Marcos Barros Vallejos, Director of Education (Chile) (July 2022) Carolina Marfan Mackenna, Safeguarding Coordinator (Chile) (July 2022) Gretchen Estela Beiza Aguayo, Safeguarding Coordinator (Chile) (July 2022) Paula Nikotian, Human Resources Director (Brazil) (July 2022) Pablo Ibañez, General Manager (Brazil) (July 2022) Vanda Ulliana, Safeguarding Manager (Brazil) (July 2022)</p> <p><u>Middle East:</u> Dave Baldwin, CEO Middle East (July 2022) Lizzie Varley, Education Adviser Middle East (July 2022)</p> <p><u>Safeguarding Reviewers</u> Lucy Jeffreys, Safeguarding Review Team Leader (July 2022)</p> |

| Audience | |
|-----------------|--|
| Audience | Group Executive Team Regional Teams Group and Regional Legal Counsel |

| Document application and publication | |
|---|-----|
| Europe and USA region | Yes |
| Asia region | Yes |
| Latin America region | Yes |
| Middle East region | Yes |

| Implementation and Review | |
|----------------------------------|-------------|
| Implementation date | August 2024 |

| Version control | | | |
|-----------------|------------|-------------|--------------------------|
| Issue | Date | Author | Reason |
| 01 | 18.08.2022 | Simon Camby | Revision |
| 02 | 31.07.2023 | Simon Camby | Annual review and update |
| 03 | 31.07.2024 | Simon Camby | Annual review and update |
| 04 | 30.06.2025 | Simon Camby | Annual review and update |