

Group Policy: Safer Recruitment Governance and Oversight August 2025



Table of Contents

Part 1: Introduction	3
Purpose and scope	3
Related documentation	3
Commitment	3
Safer Recruitment principles	3
Policy expectations	4
Part 2: Accountability and responsibility	5
Regional CEO	5
Regional HR Director	5
Head of School	6
Group Chief Education Officer	6
Part 3: The safer recruitment review process	8
Purpose	8
Cycle of review	8
Regional self-evaluation	8
School sampling	8
Escalation	10
Regional meeting and reporting	10
Annual Assurance Reporting	11
Raising concerns	11
Appendix 1 - Specialist roles	12
Appendix 2 - Regional Safer Recruitment Management Process: Asia	13
Appendix 3 - Regional Safer Recruitment Management Process: Europe & USA	17
Appendix 4a - Regional Safer Recruitment Management Process: LatAm	22
Appendix 4b - Regional Safer Recruitment Management Process: LatAm (Chile 1)	26
Appendix 5 - Regional Safer Recruitment Management Process: Middle East	30
Appendix 6 - Proprietor entered on SCR by territory	34

Part 1: Introduction

Purpose and scope

This policy outlines the arrangements for the group-wide governance and oversight of safer recruitment.

It is not the purpose of this document to outline the Cognita approach to specifics of Safer Recruitment practice. This is outlined in regional and school policies.

Related documentation

This should be read alongside the following documents:

- Group Policy: Safeguarding Governance and Oversight
- Group Policy: Integration of Newly Acquired Schools

Commitment

Cognita takes its responsibility for safeguarding all children in its care seriously. It is our number one priority. Our commitment is to the development of a culture of care, to safeguard and promote the welfare, health (including mental and physical health) and safety of children by creating and maintaining an open, safe, caring and supportive atmosphere.

This commitment is maintained across every school within the Cognita group. Cognita will act thoughtfully in ensuring that due consideration is paid to local context. The responsibility for this commitment is exercised at all levels within the Cognita organisation.

Safer Recruitment principles

Cognita is a diverse system of schools, spanning multiple jurisdictions. Cognita has intentional principles that guide the approach to Safer Recruitment in every jurisdiction.

1. We make our expectations about safer recruitment clear.
2. We train people to understand their responsibilities to hire in a way that safeguards our students.
3. We present a clear commitment to safeguarding when we hire for every role.
4. We make Cognita's commitment to safeguarding and safer recruitment practice clear to all contractors and volunteers.
5. We check the background of candidates during the hiring process.
6. We make safeguarding expectations clear through excellent HR operational guidance and onboarding documentation.
7. We record the background checks on the Single Central Record (SCR) that ensure suitability of our employees, contractors and visitors.
8. We evidence that all background checks have been completed and returned through all processes.
9. We ensure that each new starter is aware of the safeguarding requirements through probation, induction and training.

Policy expectations

Each region is expected to provide a Safer Recruitment Policy for schools in their region.

- For schools in the United Kingdom, this should align with statutory and regulatory requirements outlined in official documentation. All amendments by the government should be reflected in the Cognita policy.
- For schools outside the United Kingdom, the regional policies should be based on the requirements outlined in Appendices 2 – 5 and take account of any jurisdiction specific regulations.

Part 2: Accountability and responsibility

Each regional team is accountable and responsible for leading the operational execution of high-quality safeguarding arrangements in the region.

Regional CEO

The Regional CEO is accountable for the standards of safeguarding, including Safer Recruitment, in their region.

The Regional CEO must ensure that appropriate staffing is in place to ensure the effective implementation of all group-wide policies and expectations in regard to safeguarding and safer recruitment, with staff members receiving appropriate training for their roles in this area.

It is accepted that the operation of safer recruitment will be delegated. The Regional CEO should hold members of their team to account for the implementation of this policy. Commensurate with the group wide commitment to the highest safeguarding standards, the Regional CEO is also expected to model appropriate behaviours that contribute to a strong culture of safeguarding, including safer recruitment.

Regional HR Director

The Regional HR Director takes the lead role in ensuring that this policy is lived with fidelity on behalf of the Regional CEO. The key responsibilities of the Regional Human Resources Director (HRD) are to:

- a) Determine a regional Safer Recruitment Policy which embeds the standards set within the *Group Policy: Safer Recruitment*, to meet local legislative and regulatory requirements;
- b) Ensure the execution of the regional Safer Recruitment Policy, through embedding robust expectations and training to ensure staff understand the 'why', 'what', and 'how' in relation to the policy;
- c) Work closely with in-region HR teams (at country or cluster level) to ensure effective implementation of policies and guidance;
- d) Ensure that Heads and key leaders complete Safer Recruitment training;
- e) Ensure that Heads understand their accountability for safer recruitment and responsibility to embedding systems to live the Safer Recruitment Policy and implement regular monitoring;
- f) Draft any supporting policies, procedures and toolkits based on agreed standards and regulation, including requirements for specialist roles (see Appendix 1);
- g) Determine in-region oversight, assurance and reporting mechanisms for standards of safer recruitment and the SCR (i.e. to gain assurance that the in-region safer recruitment policy is understood and being effectively and accurately implemented);
- h) Produce an Oversight Arrangements for Safer Recruitment (OASR) document confirming accountability at regional, central team and school level, and share this with schools
- i) Ensure arrangements are in place to hold Heads of School to account through line management and, if required, disciplinary measures for compliance with the Safer Recruitment Policy;

- j) Promote the highest standards of safer recruitment in the region and share effective practice;
- k) Embed region-specific mechanisms for evaluating the effectiveness of policy implementation in each school, taking swift corrective action if necessary;
- l) Identify where there is non-compliance and address through establish protocols and policies;
- m) Engage proactively with the Independent Review process of safer recruitment in the region;
- n) Share the Global Safer Recruitment School Sampling Review Rubric with HR teams and school leaders;
- o) Report to the Regional CEO at Regional Assurance Board meeting regarding the effectiveness of the Safer Recruitment Policy, its implementation and risks; and
- p) Support, as requested by the Regional CEO, with the completion of the Annual Assurance Report and preparation for the Annual Assurance Meeting.

The ultimate responsibility for the above points will always sit with the Regional HR Director in every Cognita region. Regional structures may result in activity happening at a multi-school level (i.e. for a specific group of schools). The Regional HR Director may require HR leads in multi-school groups to carry out elements of the above and will ensure that this is documented in written expectations. Notwithstanding, the Regional HR Director retains responsibility for the entire list in their region.

The responsibilities of the HRD apply to all work within the region and this includes other businesses that are part of the Cognita entity, i.e. Active Learning group (in Europe), EnrichME (in Middle East), and Camp Asia (in Asia).

Head of School

The Head of School, at each Cognita school, is accountable for the standards of Safer Recruitment at their school¹. The precise responsibilities of the Head of School vary by region (see Appendices 2 – 5).

Every Head should:

- Ensure that the school complies with the regional safer recruitment policy;
- Ensure that all checks required are conducted with efficacy;
- Escalate concerns immediately to the country/regional team;
- Ensure that safer recruitment is lived culturally as well as through policy implementation; and
- Own any improvements or recommendations resulting from feedback and/or review.

For further detail regarding how Safer Recruitment practices are managed for each region refer to the appendices.

Note: The role of the SCR Champion is outlined in the Regional Safer Recruitment Policy.

Group Chief Education Officer

The proprietor/owner exercises governance oversight through the deployment of Independent Safeguarding Reviews across all Cognita regions. The Group Chief

Education Officer is accountable for the *Safer Recruitment Review Process* and its execution.

Part 3: The safer recruitment review process

Purpose

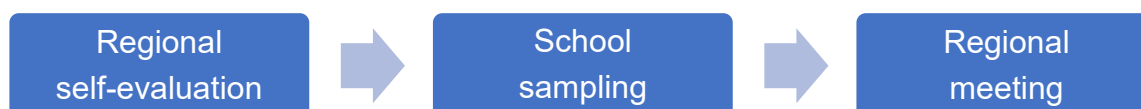
The purpose of the Safer Recruitment review process is to evaluate regional oversight of safer recruitment.

Note: The independent review of safer recruitment serves a different purpose to that of the review of safeguarding in a school:

- Safeguarding reviews evaluate safeguarding practice at school level.
- Safer recruitment reviews evaluate regional oversight arrangements.

Cycle of review

There are three parts to the Safer Recruitment review process in each region.



All three parts of the Safer Recruitment review process will occur within one academic year. The exact date of each part of the Safer Recruitment process will be agreed in advance with the Independent Reviewer dependent on the region's academic calendar.

The Safer Recruitment review process is led by a member of the Independent Safeguarding Review Team. Where possible all parts of the Safer Recruitment review process will be completed by the same safeguarding reviewer. If this is not possible (e.g. in cases where overseas travel is required), the Independent Safeguarding Reviewer commissioned for the Regional Meeting is expected to be aware of the outcome of all file sampling exercises within the region.

Regional self-evaluation

The Regional HR Director is responsible for producing a self-evaluation report of Safer Recruitment and this should be sent to the Independent Reviewer ahead of the sampling period. This should be with the Reviewer no later than ten days ahead of the sampling period. Each region should use the standard group-wide template.

School sampling

Independent Reviewers Team are deployed by the Group Chief Education Officer to conduct a sampling evaluation of safer recruitment practice. This involves:

- Evaluating knowledge and understanding of Safer Recruitment Policy and practice through discussion with regional leaders, senior leaders in schools and the staff responsible for safer recruitment; and
- A file sampling exercise. Sampling provides an evidence base regarding Safer Recruitment standards drawing on first-hand evidence. The file sampling exercise will involve reconciling files in different categories on the Single Central Record Tracker (SCRT). In some circumstances this may be undertaken remotely.

N.B. the proprietor named on the SCR may differ between Cognita territories. For further information about the proprietor named on the SCR for each Cognita territory, please refer to Appendix 6.

The purpose of the evaluation is to:

1. Evaluate the implementation of policy and practice by leaders, and administrators;
2. Confirm strengths in the recording of safer recruitment practice; and
3. Identify areas for development.

Sampling is undertaken against the standards outlined in the regional policy/policies. These are reflected in the Global Safer Recruitment Review Sampling Rubric. It is the responsibility of the Regional HR Director to ensure that these standards, including the rubric, are communicated annually to schools and lived through regional and school policies.

In each academic year, the sample will include:

- approximately 25% of Cognita schools¹. Only schools that are identified for an Independent Safeguarding Review within a region/country will be eligible for sampling; and
- All schools undergoing their first full independent safeguarding review (following the New Acquisition Review). Note that any schools in this category are in addition to those included in the bullet point above.

Regional HR Directors will submit recommendations regarding the schools that they feel would benefit most from file sampling in an academic year. This includes a rationale for the choice.

Where there are specific reasons for including more schools in the sample, the Regional HR Director will make this case directly to the Group Chief Education Officer.

The Group Chief Education Officer reserves the right to commission a review of any school, at any time, should the need arise.

The following process will be followed:

1. Head of Group Education Insight and Projects determines sample size for the coming year, dependent on number of reviews scheduled and communicates this to Regional HR Directors.
2. Regional HR Directors propose sample for the coming year with rationale for sample choice.
3. Independent Reviewers liaise with Regional HR Directors to validate the specific schools chosen for sampling.
4. In sampling, Independent Reviewers will prioritise new starters within past 1-2 years. Reviewers will use the detail contained in Appendices 2 – 5 of this policy in order to be informed where responsibility for specific safer recruitment activity sits.

¹ In 2024 (16.05.24) the Group Executive Team evaluated the rationale for annual sampling of 25% of schools being reviewed (with new schools being outside this percentage). As a result of this discussion, it was agreed that this is appropriate, noting that each region must have their own region-specific monitoring arrangements in place.

5. The emphasis is on 'sampling' and not 'auditing'. If problems are found on a small sample, it would be for the school and Regional HR Director to determine the extent to which further internal sampling should take place, i.e. based on a test of materiality.
6. Sampling includes both employee and non-employee records (contractors, volunteers, peripatetic staff). Note: This may require meeting Cognita colleagues from different team who take responsibility for engaging contractors.
7. Findings from the sampling should be discussed with the person that has closest leadership oversight of the SCR and/or the Head of School who is accountable for the standards of safeguarding (noting this could be either in school or in the country/regional team if there is centralisation).
8. Reviewers should focus on aspects of recruitment which directly keep students safe.

Following the sampling exercise (at school level) the Independent Reviewer will complete a Compliance Statement which includes RAG rating.

	<p>Safer recruitment standards have not been implemented and require immediate action.</p> <p>Any item graded as red will have an 'action to meet regulations or policy'.</p>
	<p>Safer recruitment standards have been implemented but require further development to ensure that Cognita policy and guidance for the region are fully met, or to be fully embedded.</p> <p>No aspect of practice requiring development has put children's safety at risk.</p>
	<p>Safer recruitment standards have been met and comply with policy and guidance on best practice for the region.</p> <p>Areas of leading practice, which others may learn from, may be identified in the report.</p>

This report will be sent to:

- Head of School
- Regional HR Director
- General Manager / Managing Director for the school

Escalation

Where reviewers have serious concerns about practice in a school they should utilise the established escalation protocol outlined in the associated group policy, via the Independent Review Team Leader.

Regional meeting and reporting

Reviewers will produce a report that provides the regional team with actionable insight. The report must be produced using the agreed standard template. The purpose of the meeting is for the Independent Reviewer to report back on findings from the sampling and to triangulate the findings from the Regional Self-Evaluation report with the sampling exercise.

The meeting agenda includes:

1. Feedback from sampling exercise and draft regional report (see below).
2. Reflective triangulation with regional self-evaluation and school sampling.
3. Agreed next steps.

The Independent Reviewer report includes:

- Context
- Evaluative strengths
- Actions for regional team to comply with policy
- Developmental recommendations for continual improvement
- Risks to the proprietor
- School sampling compliance statement RAG table
- Recorded rationale for selection of schools in the sample
- School compliance statements (reported separately to school / region)

The distribution list for evidence-based external Safer Recruitment reports should be as follows:

Regional Team:

- Regional CEO
- Regional HR Director and relevant country HR Lead (for both employees and non-employees/contractors, if different)

Group Team:

- Group Chief Education Officer
- Head of Group Education Insight and Projects

Independent Review:

- Independent Review Team Leader
- Independent Reviewer completing the regional report

[Annual Assurance Reporting](#)

Regions report to the Group Chief Education Officer in relation to Safer Recruitment annually via the Regional Annual Governance Meeting.

[Raising concerns](#)

Any concerns about safeguarding matters or the content of this policy should be addressed to the Group Chief Education Officer.

Appendix 1 - Specialist roles

Many Cognita schools employ colleagues to undertake specialist roles supporting students. These are roles that require specific qualifications and sometimes licences.

This includes but is not limited to:

- Nurses
- Doctors
- Lifeguards
- Swimming instructors
- Counsellors, therapists, psychologists

Other staff members who require specific qualifications/licences (aside from routine teaching qualifications) to be permitted to practice within their role should also be considered within this group.

These individuals will have all the routine employment checks that are outlined in the relevant Safer Recruitment Policy. However, due to the nature of these roles and the link to the safety and safeguarding of students, additional checks are also required. As such, we must ensure that individuals in these roles:

1. Have the appropriate qualifications at the point of recruitment; and
2. Undertake the relevant ongoing training and development to maintain relevant licences and registration.
3. Provide evidence whenever accreditation, registration and/ or practicing licences are renewed

This policy makes it a requirement for each region, under the direction of the Regional HR Director to:

1. Establish an inventory/matrix that shows the required and acceptable qualifications for this specialist roles. This should include identifying what is and is not acceptable, including country of origin, where appropriate.
2. Identify the source of any regulatory requirements of the local jurisdiction, if relevant. This information should be detailed within the inventory/matrix.
3. Identify the appropriate registration/regulatory body for the individual to be externally licensed, if appropriate. This information should be detailed within the inventory/matrix.
4. Identify the ongoing training or development required for individual to maintain their licence. This information should be detailed within the inventory/matrix.
5. Outline the expectations for checking qualifications and competence at the point of recruitment and on an ongoing basis. This information should be detailed within the inventory/matrix.

Appendix 2 - Regional Safer Recruitment Management Process: Asia

Regional CEO (accountable for safeguarding standards)
Sameer Aggarwal

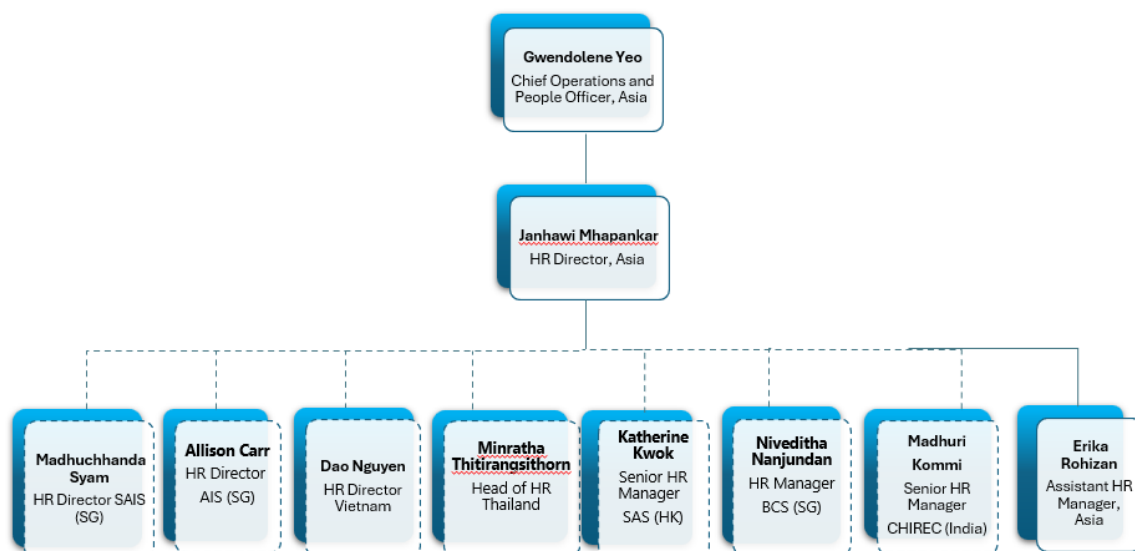
Regional HR Director (responsible for implementation of policy)
Gwendolene Yeo

Scope

All schools in the Asia region. At time of publication this includes:

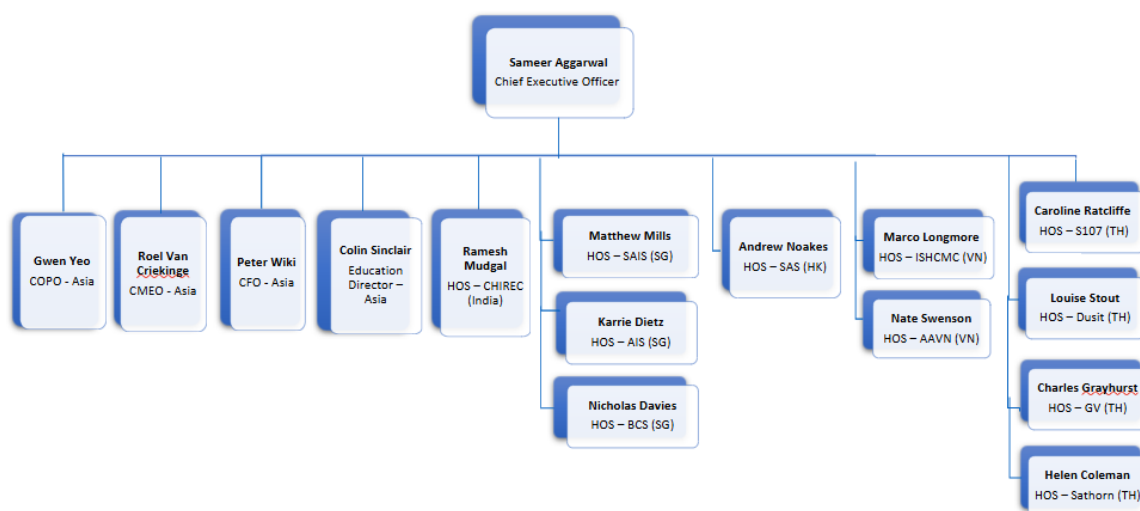
- Singapore
- Vietnam
- Thailand
- Hong Kong
- India

Regional HR Team Structure Chart



Grouping of schools

Asia Leadership Team Organization Chart



Where responsibility for activity sits in the region

The chart below outlines where responsibility sits for each part of the safer recruitment flow. The detail in this chart helps Independent Reviewers understand where to focus scrutiny.

Principle	Specifics	School	Country/Cluster	Region
We make our expectations about safer recruitment clear.	<ul style="list-style-type: none"> Written and understood regional Safer Recruitment Policy in place, implemented and reviewed annually (owned by Regional HR Director) Policy to indicate school, centralised HR teams, and regional accountabilities (where this differs from centralised teams) and responsibilities 			Responsible
We train people to understand their responsibilities to hire in a way that safeguards our students.	<ul style="list-style-type: none"> Safer recruitment training in place for regional and centralised teams and school-based teams Training that ensures all colleagues understand 'why' as well as 'what' and 'how' in relation to safer recruitment 			Responsible
We present a clear commitment to safeguarding when we hire for every role.	<ul style="list-style-type: none"> Safeguarding commitment statement to be included in both Role Profile and job advertisement (to deter unsuitable personnel) 	Responsible		
We make Cognita's commitment to safeguarding and safer recruitment practice clear to all contractors and volunteers.	<ul style="list-style-type: none"> Contracts include expectations of background checks that must be completed. There is a clear understanding from any Cognita team that engages contractors about the importance of this and evidence of impactful execution. 	Responsible		
We check the background of candidates during the hiring process.	<ul style="list-style-type: none"> Application form (to be used as main tool for scrutinising) Internet search (to gather any public domain information) Full employment and education history (to provide previous experience) 	Responsible		

Principle	Specifics	School	Country/Cluster	Region
	<ul style="list-style-type: none"> Gaps in employment history (to be noted for further exploration) Taking up references (to verify previous experience) Concerns from a reference (to be noted for further exploration) Invitation to interview (to prepare applicants for interview) Preparing for the interview (Selection Process and Interview Panel) Verify identity Verify professional qualifications Interview records are completed and kept in employee file (Scope of Interview, Outcome and Regrets) 			
We make safeguarding expectations clear through contracting and related documentation.	<ul style="list-style-type: none"> Offer of employment, including someone who has lived or worked abroad, are conductional satisfactory completion of the necessary background checks and expectations Terms and Conditions of Employment refer to safeguarding requirements Probation includes reference to safeguarding Rehabilitation of Offenders (UK only) Disciplinary and Performance Improvement Procedure refer to safeguarding Safeguarding Declaration 	Responsible		
We record the background checks on the SCR that ensure the suitability of our employees, contractors and volunteers.	<ul style="list-style-type: none"> References Identity check Right to Work Enhanced Disclosure and Barred List check Overseas criminal records checks (if applicable) Letter of Professional Standing (if applicable) Prohibition from Teaching check (if applicable) Prohibition from Management check (if applicable) Medical fitness Disqualification declaration (if applicable) Risk assessment completed for any outstanding background checks before the employee commences work Risk assessments are completed on new supervised volunteers to determine the level of check required Single central record tracker (is maintained in line with Cognita requirements for all staff and relevant others including, supply staff, proprietor and volunteers All employee files reconcile with the SCRT 	Responsible		
We evidence that all background checks have been completed and returned through all processes.	<ul style="list-style-type: none"> New Starter Checklist (to be completed and filed on personnel file) Risk Assessment Form (to be completed and filed on personnel file where manual 	Responsible		

Principle	Specifics	School	Country/Cluster	Region
	<ul style="list-style-type: none"> and not included into the SCRT) ▪ Annual Staff Declaration (Safeguarding and Compliance Record) ▪ Change of Employment 			
We ensure that each new starter is aware of the safeguarding requirements through probation, induction and training.	<ul style="list-style-type: none"> ▪ Through induction and probation the school's attitude and expectations regarding safeguarding are clearly articulated including personal behaviours and reporting lines for any concerns ▪ Annual Child Protection Training should be completed during the probation period ▪ Assess performance, conduct and final suitability for working with children in your school before confirming permanent appointment 	Responsible		

N.B. The information detailed above was correct as of July 2025. This information will be updated within the next scheduled review of this document. As post-holders may change from time to time, it is recommended that the regional team are consulted directly if you have any queries in relation to the roles listed above and current post-holders.

Appendix 3 - Regional Safer Recruitment Management Process: Europe & USA

Regional CEO (accountable for safeguarding standards)
Michael Drake

Regional CPO (responsible for implementation of policy)
Vicky Kidd

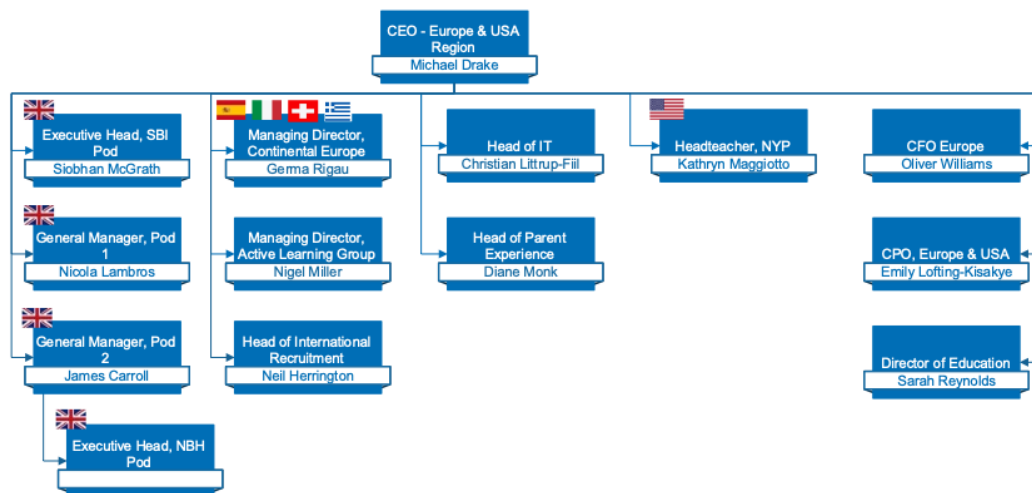
Scope

All schools in the Europe & USA region. At time of publication this includes:

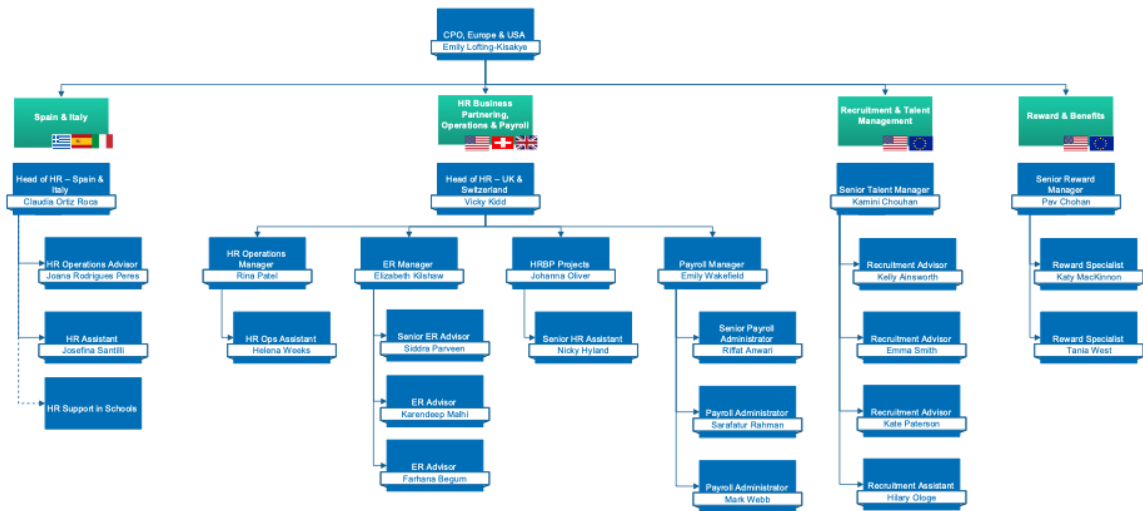
- United Kingdom
- Spain
- Italy
- Switzerland
- Greece
- The United States of America

Regional HR Team Structure Chart

Europe & USA Executive Organisation Structure



Human Resources & Payroll Organisation Structure



Grouping of schools

Europe & USA School Heads – Sept '25

UK POD 1 Nicola Lambros, GM		UK POD 2 James Carroll, GM		Alley's & NBH James Carroll, GM	Continental Europe Germà Rigau Dominguez, MD	USA & OBS Michael Drake
Essex Colchester High Karen Gracie-Langrick (EA) St Margaret's Carolyn Moss	Huddersfield Grammar Stuart Rees Kingscourt Kerrie Daunter Meoncross Sarah Ebery (EA)	London N & W Duncombe (EA) Jeremy Phelan Hendon Prep Matthew Foley Salcombe Prep Nicola Sands	South & SW London Breaside Karen Nicholson (EA) Clifton Lodge Michael Belsito Oakfields Matthew Booth	NBH Canonbury Charlotte Tassel-Dent Alley's Hampstead Senior & Sixth Form Chris Jones Alley's Hampstead Pre-Prep & Nursery Sarah Styles Alley's Regents Park Prep Tom Le Tissier	BSB Neil Tetley Hastings Ian Piper ISZN & Four Forest James Stenning Doukas Konstantinos Doukas	YPS Kathryn Maggiotto OBS Uwe Feuersenger
Midlands Akeley Wood Vanessa Conlan Quinton House Yoni Muskin Hydesville Raj Samra	St Mary's Stephen Blundell Kings School Plymouth Clare Page	Surrey Downsend (EA) Bex Tear Downsend Pre-Prep Lisa Burns Glenesk Sarah Bradley Cumnor Boys & Girls Emma Edwards	Charterhouse Square Tushi Gorasia BCPK Lola Gaffney Milbourne Lodge Judith Waite	SBI James Carroll, GM Siobhan McGrath, Exec Principal Hampstead Stuart Bain Kensington David MacMorran Westminster Angela Liu	Spain & Italy Germà Rigau Dominguez, MD Alvaro De Miquel Alvarez, GM CEM Marta Pérez Mirasur Pedro Sampedro TEMS Jonathan Gunzi ELIS Murcia Vanessa Grimward ELIS Villamartin Jon Wayth BSV Jake Capper Meres Luis Carlos Jiménez FBS, Italy Leonardo Amulli	

Where responsibility for activity sits in the region

The chart below outlines where responsibility sits for each part of the safer recruitment flow. The detail in this chart helps Independent Reviewers understand where to focus scrutiny.

Principle	Specifics	School	Country/Cluster	Region
We make our expectations about safer recruitment clear.	<ul style="list-style-type: none"> Written and understood regional Safer Recruitment Policy in place, implemented and reviewed annually (owned by Regional HR Leader) Policy to indicate school, centralised HR teams, and regional accountabilities (where this differs from centralised teams) and responsibilities 			Responsible
We train people to understand their responsibilities to hire in a way that safeguards our students.	<ul style="list-style-type: none"> Safer recruitment training in place for regional and centralised teams and school-based teams Training that ensures all colleagues understand 'why' as well as 'what' and 'how' in relation to safer recruitment 			Responsible
We present a clear commitment to safeguarding when we hire for every role.	<ul style="list-style-type: none"> Safeguarding commitment statement to be included in both Role Profile and job advertisement (to deter unsuitable personnel) 	Responsible	Responsible	Responsible
We make Cognita's commitment to safeguarding and safer recruitment practice clear to all contractors and volunteers.	<ul style="list-style-type: none"> Contracts include expectations of background checks that must be completed. There is a clear understanding from any Cognita team that engages contractors about the importance of this and evidence of impactful execution. 		Responsible	Responsible
We check the background of candidates during the hiring process.	<ul style="list-style-type: none"> Application form (to be used as main tool for scrutinising) Internet search (to gather any public domain information) Full employment and education history (to provide previous experience) Gaps in employment history (to be noted for further exploration) Taking up references (to verify previous experience) Concerns from a reference (to be noted for further exploration) Invitation to interview (to prepare applicants for interview) Preparing for the interview (Selection Process and Interview Panel) Verify identity Verify professional qualifications Interview records are completed and kept in employee file (Scope of Interview, Outcome and Regrets) 	Responsible	Responsible	Responsible
We make safeguarding expectations clear through contracting and related documentation.	<ul style="list-style-type: none"> Offer of employment, including someone who has lived or worked abroad, are contractual satisfactory completion of the necessary background checks and expectations Terms and Conditions of Employment refer to safeguarding requirements 	Responsible	Responsible	Responsible

Principle	Specifics	School	Country/Cluster	Region
	<ul style="list-style-type: none"> Probation includes reference to safeguarding Rehabilitation of Offenders (UK only) Disciplinary and Performance Improvement Procedure refer to safeguarding Safeguarding Declaration 			
We record the background checks on the SCR that ensure the suitability of our employees, contractors and volunteers.	<ul style="list-style-type: none"> References Identity check Right to Work Enhanced Disclosure and Barred List check Overseas criminal records checks (if applicable) Letter of Professional Standing (if applicable) Prohibition from Teaching check (if applicable) Prohibition from Management check (if applicable) Medical fitness Disqualification declaration (if applicable) Risk assessment completed for any outstanding background checks before the employee commences work Risk assessments are completed on new supervised volunteers to determine the level of check required Single central record tracker (is maintained in line with Cognita requirements for all staff and relevant others including, supply staff, proprietor and volunteers) All employee files reconcile with the SCRT 	Responsible	Responsible	Responsible
We evidence that all background checks have been completed and returned through all processes.	<ul style="list-style-type: none"> New Starter Checklist (to be completed and filed on personnel file) Risk Assessment Form (to be completed and filed on personnel file where manual and not included into the SCRT) Annual Staff Declaration (Safeguarding and Compliance Record) Change of Employment 	Responsible	Responsible	Responsible
We ensure that each new starter is aware of the safeguarding requirements through probation, induction and training.	<ul style="list-style-type: none"> Through induction and probation the school's attitude and expectations regarding safeguarding are clearly articulated including personal behaviours and reporting lines for any concerns Annual Child Protection Training should be completed during the probation period Assess performance, conduct and final suitability for working with children in your school before confirming permanent appointment 	Responsible		

N.B. The information detailed above was correct as of July 2025. This information 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 4a - Regional Safer Recruitment Management Process: LatAm

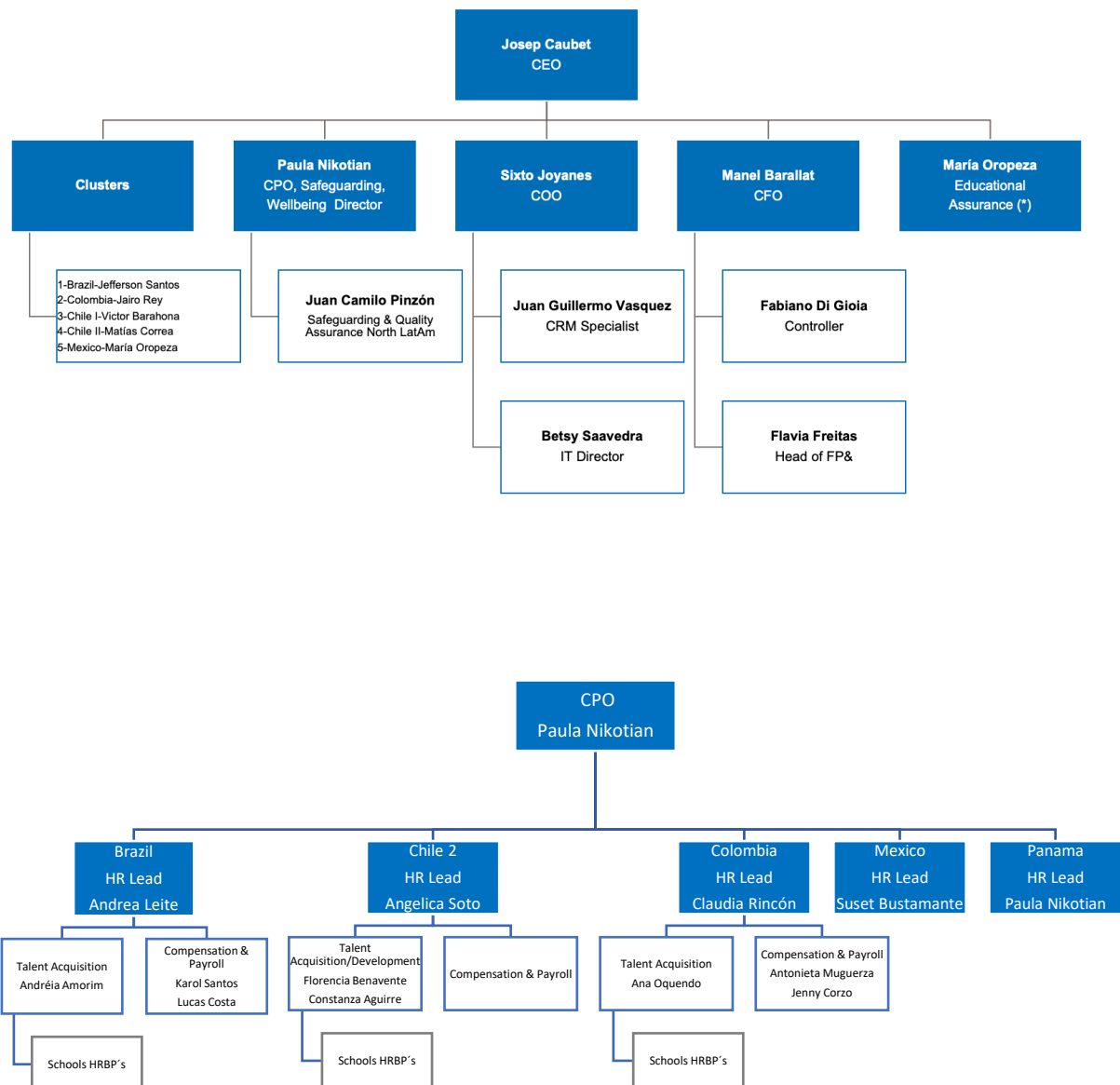
Regional CEO (accountable for safeguarding standards)
Josep Caubet

Regional HR Director (responsible for implementation of policy)
Paula Nikotian

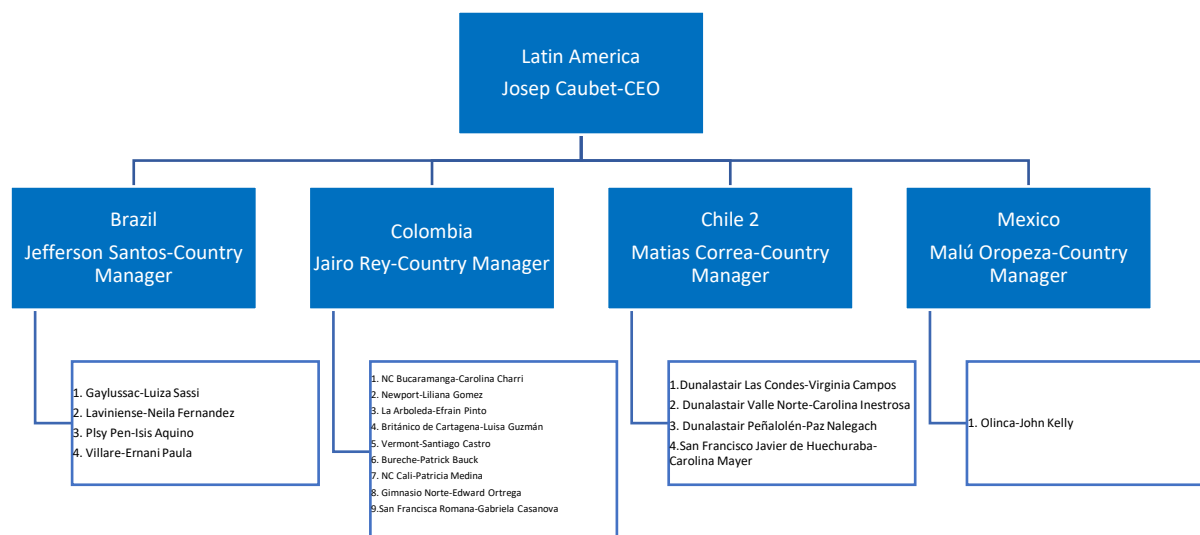
Scope

All schools in the LatAm region, excluding Chile 1. At time of publication this includes: Chile 2, Brazil, Colombia, Mexico.

Regional HR Team Structure Chart



Grouping of schools



Where responsibility for activity sits in the region

The chart below outlines where responsibility sits for each part of the safer recruitment flow. The detail in this chart helps Independent Reviewers understand where to focus scrutiny.

Principle	Specifics	School	Country/Cluster	Region
We make our expectations about safer recruitment clear.	<ul style="list-style-type: none"> Written and understood regional Safer Recruitment Policy in place, implemented and reviewed annually (owned by Regional HR Director) Policy to indicate school, centralised HR teams, and regional accountabilities (where this differs from centralised teams) and responsibilities 			Responsibility
We train people to understand their responsibilities to hire in a way that safeguards our students.	<ul style="list-style-type: none"> Safer recruitment training in place for regional and centralised teams and school-based teams Training that ensures all colleagues understand 'why' as well as 'what' and 'how' in relation to safer recruitment 			Responsibility
We present a clear commitment to safeguarding when we hire for every role.	<ul style="list-style-type: none"> Safeguarding commitment statement to be included in both Role Profile and job advertisement (to deter unsuitable personnel) 		Responsibility	
We make Cognita's commitment to safeguarding and safer recruitment practice clear to all	<ul style="list-style-type: none"> Contracts include expectations of background checks that must be completed. There is a clear understanding from any Cognita team that 		Responsibility	

contractors and volunteers.	engages contractors about the importance of this and evidence of impactful execution.			
We check the background of candidates during the hiring process.	<ul style="list-style-type: none"> ▪ Application form (to be used as main tool for scrutinising) ▪ Internet search (to gather any public domain information) ▪ Full employment and education history (to provide previous experience) ▪ Gaps in employment history (to be noted for further exploration) ▪ Taking up references (to verify previous experience) ▪ Concerns from a reference (to be noted for further exploration) ▪ Invitation to interview (to prepare applicants for interview) ▪ Preparing for the interview (Selection Process and Interview Panel) ▪ Verify identity ▪ Verify professional qualifications ▪ Interview records are completed and kept in employee file (Scope of Interview, Outcome and Regrets) 	Responsibility		
We make safeguarding expectations clear through contracting and related documentation.	<ul style="list-style-type: none"> ▪ Offer of employment, including someone who has lived or worked abroad, are conductional satisfactory completion of the necessary background checks and expectations ▪ Terms and Conditions of Employment refer to safeguarding requirements ▪ Probation includes reference to safeguarding ▪ Rehabilitation of Offenders (UK only) ▪ Disciplinary and Performance Improvement Procedure refer to safeguarding ▪ Safeguarding Declaration 		Responsibility	
We record the background checks on the SCR that ensure the suitability of our employees, contractors and volunteers.	<ul style="list-style-type: none"> ▪ References ▪ Identity check ▪ Right to Work ▪ Enhanced Disclosure and Barred List check ▪ Overseas criminal records checks (if applicable) ▪ Letter of Professional Standing (if applicable) ▪ Prohibition from Teaching check (if applicable) ▪ Prohibition from Management check (if applicable) ▪ Medical fitness ▪ Disqualification declaration (if applicable) ▪ Risk assessment completed for any outstanding background checks before the employee commences work ▪ Risk assessments are completed on new supervised volunteers to determine the level of check required ▪ Single central record tracker (is maintained in line with Cognita requirements for all staff and relevant others including, supply staff, proprietor and volunteers) 		Responsibility	

	<ul style="list-style-type: none"> All employee files reconcile with the SCRT 			
We evidence that all background checks have been completed and returned through all processes.	<ul style="list-style-type: none"> New Starter Checklist (to be completed and filed on personnel file) Risk Assessment Form (to be completed and filed on personnel file where manual and not included into the SCRT) Annual Staff Declaration (Safeguarding and Compliance Record) Change of Employment 	Responsibility		
We ensure that each new starter is aware of the safeguarding requirements through probation, induction and training.	<ul style="list-style-type: none"> Through induction and probation the school's attitude and expectations regarding safeguarding are clearly articulated including personal behaviours and reporting lines for any concerns Annual Child Protection Training should be completed during the probation period Assess performance, conduct and final suitability for working with children in your school before confirming permanent appointment 	Responsibility		

N.B. The information detailed above was correct as of July 2025. This information 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 4b - Regional Safer Recruitment Management Process: LatAm (Chile 1)

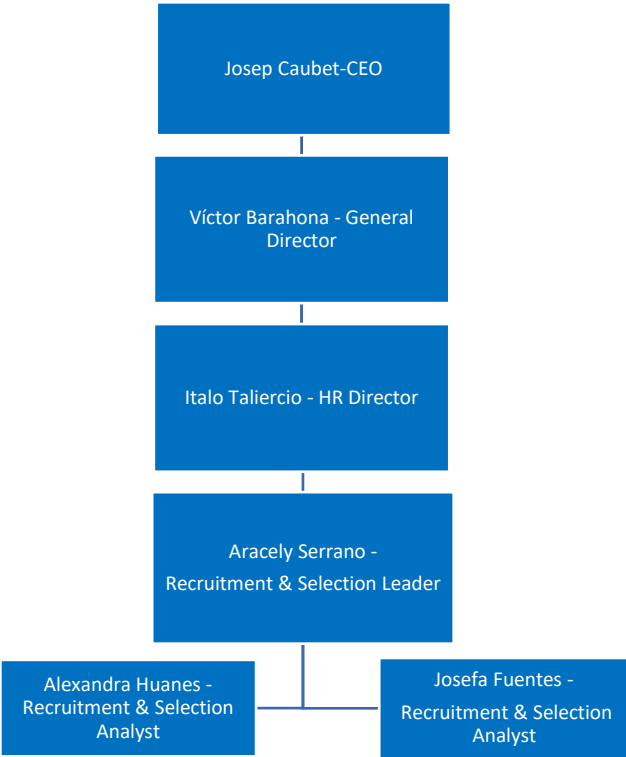
Regional CEO (accountable for safeguarding standards)
Josep Caubet

Chile 1 General Manager (accountable for safeguarding standards)
Victor Barahona

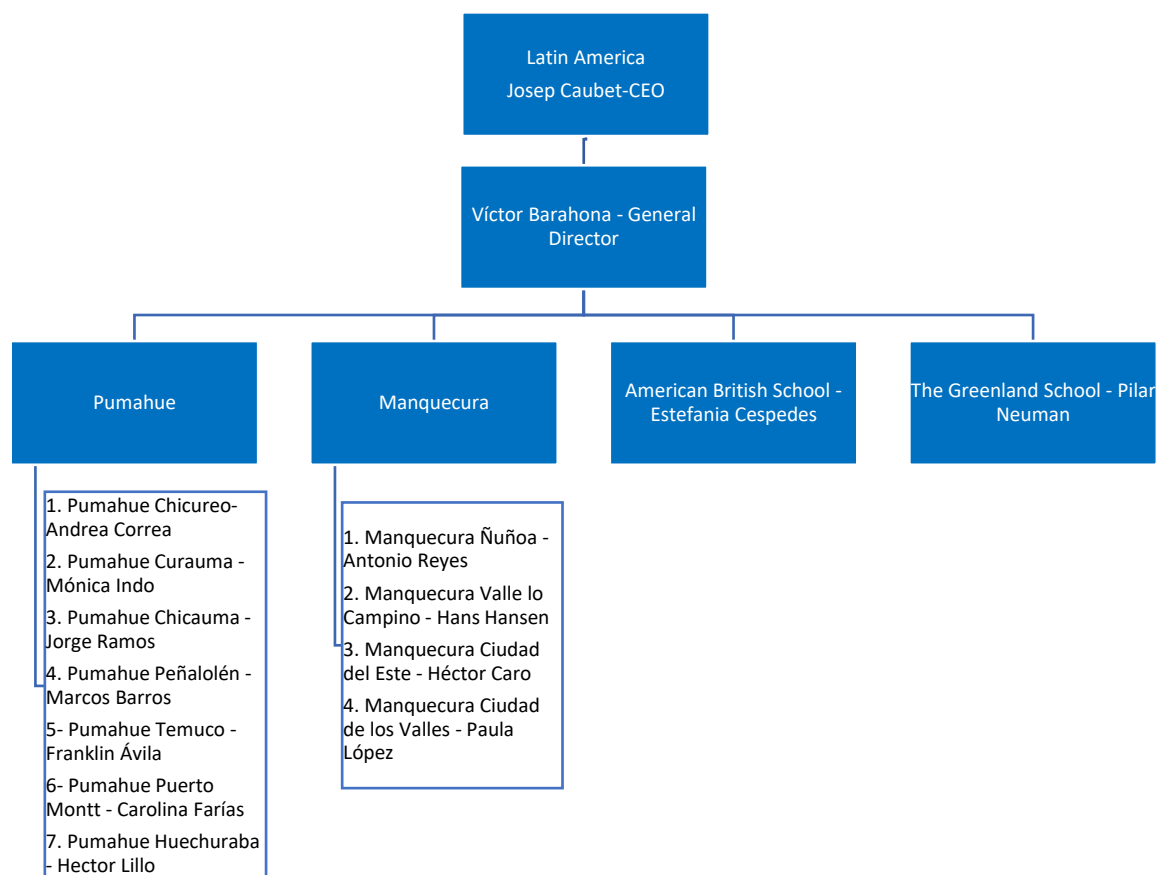
Chile 1 HR Director (responsible for implementation of policy)
Italo Taliercio

Scope
All schools in the LatAm Chile 1 region. At time of publication this includes: Chile 1.

Regional HR Team Structure Chart



Grouping of schools



Where responsibility for activity sits in the region

The chart below outlines where responsibility sits for each part of the safer recruitment flow. The detail in this chart helps Independent Reviewers understand where to focus scrutiny.

Principle	Specifics	School	Country/Cluster	Region (N/A)
We make our expectations about safer recruitment clear.	<ul style="list-style-type: none"> Written and understood regional Safer Recruitment Policy in place, implemented and reviewed annually (owned by Regional HR Director) Policy to indicate school, centralised HR teams, and regional accountabilities (where this differs from centralised teams) and responsibilities 		Responsibility	
We train people to understand their responsibilities to hire in a way that safeguards our students.	<ul style="list-style-type: none"> Safer recruitment training in place for regional and centralised teams and school-based teams Training that ensures all colleagues understand 'why' as well as 'what' and 'how' in relation to safer recruitment 		Responsibility	
We present a clear commitment to safeguarding when we hire for every role.	<ul style="list-style-type: none"> Safeguarding commitment statement to be included in both Role Profile and job advertisement (to deter unsuitable personnel) 		Responsibility	

We make Cognita's commitment to safeguarding and safer recruitment practice clear to all contractors and volunteers.	<ul style="list-style-type: none"> Contracts include expectations of background checks that must be completed. There is a clear understanding from any Cognita team that engages contractors about the importance of this and evidence of impactful execution. 		Responsibility	
We check the background of candidates during the hiring process.	<ul style="list-style-type: none"> Application form (to be used as main tool for scrutinising) 	Responsibility		
	<ul style="list-style-type: none"> Internet search (to gather any public domain information) (N/A) 			
	<ul style="list-style-type: none"> Full employment and education history (to provide previous experience) Gaps in employment history (to be noted for further exploration) Taking up references (to verify previous experience) Concerns from a reference (to be noted for further exploration) 		Responsibility	
	<ul style="list-style-type: none"> Invitation to an interview at the school (to prepare applicants for interview) 	Responsibility		
	<ul style="list-style-type: none"> Preparing for the interview (Selection Process and Interview Panel) 	Responsibility		
	<ul style="list-style-type: none"> Invitation to psychological evaluation Psychological evaluation Verify identity Verify professional qualifications 		Responsibility	
	<ul style="list-style-type: none"> Interview records are completed and kept in employee file (Scope of Interview, Outcome and Regrets) 	Responsibility		
We make safeguarding expectations clear through contracting and related documentation.	<ul style="list-style-type: none"> Offer of employment, including someone who has lived or worked abroad, are conductional satisfactory completion of the necessary background checks and expectations Terms and Conditions of Employment refer to safeguarding requirements Probation includes reference to safeguarding Disciplinary and Performance Improvement Procedure refer to safeguarding Safeguarding Declaration 		Responsibility	

We record the background checks on the SCR that ensure the suitability of our employees, contractors and volunteers.	<ul style="list-style-type: none"> References Identity check Right to Work Enhanced Disclosure and Barred List check Overseas criminal records checks (if applicable) Letter of Professional Standing (if applicable) Prohibition from Teaching check (if applicable) Prohibition from Management check (if applicable) Medical fitness Disqualification declaration (if applicable) 		Responsibility	
	<ul style="list-style-type: none"> Risk assessment completed for any outstanding background checks before the employee commences work Risk assessments are completed on new supervised volunteers to determine the level of check required 	Responsibility		
	<ul style="list-style-type: none"> Single central record tracker (is maintained in line with Cognita requirements for all staff and relevant others including, supply staff, proprietor and volunteers) All employee files reconcile with the SCRT 		Responsibility	
We evidence that all background checks have been completed and returned through all processes.	<ul style="list-style-type: none"> New Starter Checklist (to be completed and filed on personnel file) Risk Assessment Form (to be completed and filed on personnel file where manual and not included into the SCRT) Annual Staff Declaration (Safeguarding and Compliance Record) Change of Employment 		Responsibility	
We ensure that each new starter is aware of the safeguarding requirements through probation, induction and training.	<ul style="list-style-type: none"> Through induction and probation the school's attitude and expectations regarding safeguarding are clearly articulated including personal behaviours and reporting lines for any concerns. 	Responsibility		
	<ul style="list-style-type: none"> Annual Child Protection Training should be completed during the probation period 		Responsibility	
	<ul style="list-style-type: none"> Assess performance, conduct and final suitability for working with children in your school before confirming permanent appointment 	Responsibility		

N.B. The information detailed above was correct as of July 2025. This information 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 Safer Recruitment Management Process: Middle East

Regional CEO (accountable for safeguarding standards)
David Baldwin

Regional HR Director (responsible for implementation of policy)
Stuart Millman (in interim role)

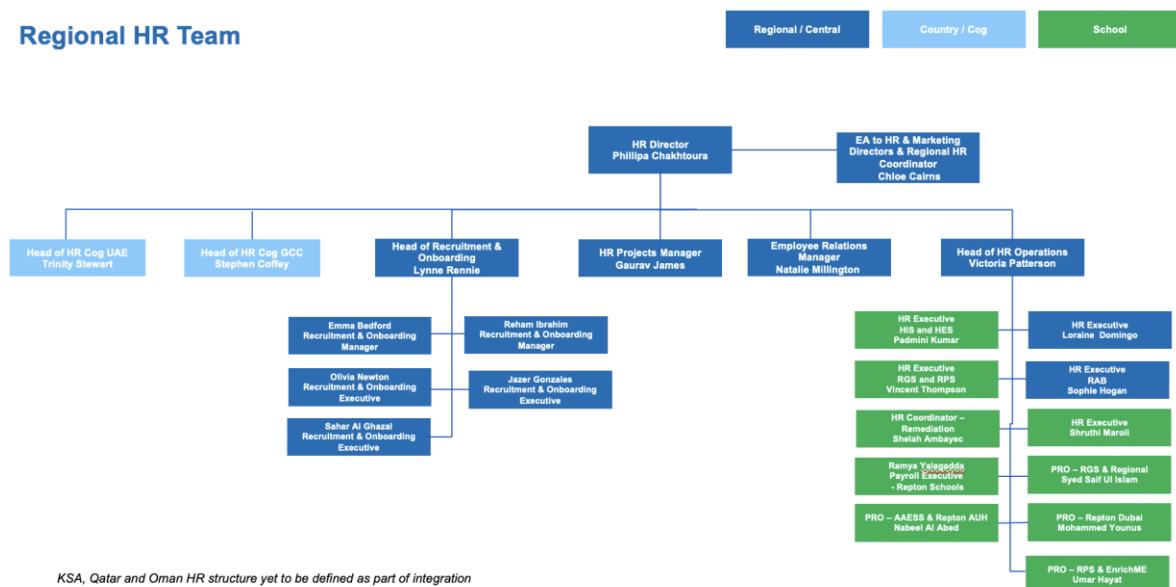
Scope

All schools in the Middle East region. At time of publication this includes:

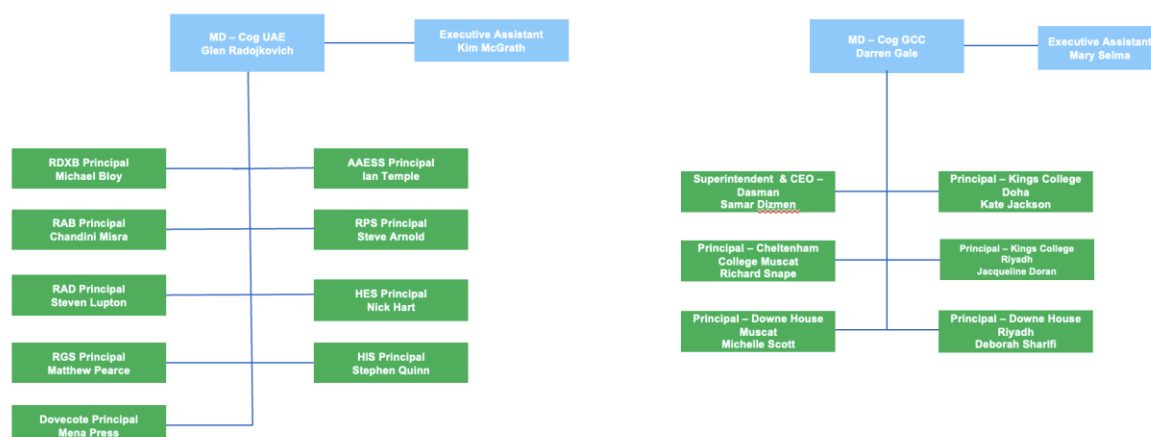
- The United Arab Emirates
- Kuwait
- Oman
- The Kingdom of Saudi Arabia
- Qatar

Regional HR Team Structure Chart

Regional HR Team



Grouping of schools



Where responsibility for activity sits in the region

The chart below outlines where responsibility sits for each part of the safer recruitment flow. The detail in this chart helps Independent Reviewers understand where to focus scrutiny.

Principle	Specifics	School	Country/Cluster	Region
We make our expectations about safer recruitment clear.	<ul style="list-style-type: none"> Written and understood regional Safer Recruitment Policy in place, implemented and reviewed annually (owned by Regional HR Director) Policy to indicate school, centralised HR teams, and regional accountabilities (where this differs from centralised teams) and responsibilities 			Responsible (HRD)
We train people to understand their responsibilities to hire in a way that safeguards our students.	<ul style="list-style-type: none"> Safer recruitment training in place for regional and centralised teams and school-based teams Training that ensures all colleagues understand 'why' as well as 'what' and 'how' in relation to safer recruitment 		Responsible (Head of HR Cog)	
We present a clear commitment to safeguarding when we hire for every role.	<ul style="list-style-type: none"> Safeguarding commitment statement to be included in both Role Profile and job advertisement (to deter unsuitable personnel) 			Responsible (Head of Recruitment and Recruitment Team)
We make Cognita's commitment to safeguarding and safer recruitment practice clear to all contractors and volunteers.	<ul style="list-style-type: none"> Contracts include expectations of background checks that must be completed. There is a clear understanding from any Cognita team that engages contractors about the importance of this and evidence of impactful execution. 		Responsible (Head of HR Cog)	
We check the background of candidates during the hiring process.	<ul style="list-style-type: none"> Application form (to be used as main tool for scrutinising) Internet search (to gather any public domain information) Full employment and education history (to provide previous experience) Gaps in employment history (to be noted for further exploration) 			Responsible (Head of Recruitment)

Principle	Specifics	School	Country/Cluster	Region
	<ul style="list-style-type: none"> Taking up references (to verify previous experience) Concerns from a reference (to be noted for further exploration) Invitation to interview (to prepare applicants for interview) Preparing for the interview (Selection Process and Interview Panel) Verify identity Verify professional qualifications Interview records are completed and kept in employee file (Scope of Interview, Outcome and Regrets) 			
We make safeguarding expectations clear through contracting and related documentation.	<ul style="list-style-type: none"> Offer of employment, including someone who has lived or worked abroad, are conditional satisfactory completion of the necessary background checks and expectations Terms and Conditions of Employment refer to safeguarding requirements Probation includes reference to safeguarding Rehabilitation of Offenders (UK only) Disciplinary and Performance Improvement Procedure refer to safeguarding Safeguarding Declaration 		Responsible – Employee Lifecycle (Head of HR Cog)	Responsible – Onboarding (Head of Recruitment)
We record the background checks on the SCR that ensure the suitability of our employees, contractors and volunteers.	<ul style="list-style-type: none"> References Identity check Right to Work Enhanced Disclosure and Barred List check Overseas criminal records checks (if applicable) Letter of Professional Standing (if applicable) Prohibition from Teaching check (if applicable) Prohibition from Management check (if applicable) Medical fitness Disqualification declaration (if applicable) Risk assessment completed for any outstanding background checks before the employee commences work Risk assessments are completed on new supervised volunteers to determine the level of check required Single central record tracker (is maintained in line with Cognita requirements for all staff and relevant others including, supply staff, proprietor and volunteers) All employee files reconcile with the SCRT 			Responsible (Head of HR Operations)
We evidence that all background checks have been completed and returned through all processes.	<ul style="list-style-type: none"> New Starter Checklist (to be completed and filed on personnel file) Risk Assessment Form (to be completed and filed on personnel file where manual and not included into the SCRT) 			Responsible – (Head of HR Operations)

Principle	Specifics	School	Country/Cluster	Region
	<ul style="list-style-type: none"> Annual Staff Declaration (Safeguarding and Compliance Record) Change of Employment 			
We ensure that each new starter is aware of the safeguarding requirements through probation, induction and training.	<ul style="list-style-type: none"> Through induction and probation the school's attitude and expectations regarding safeguarding are clearly articulated including personal behaviours and reporting lines for any concerns Annual Child Protection Training should be completed during the probation period Assess performance, conduct and final suitability for working with children in your school before confirming permanent appointment 		Responsible (Head of HR Cog)	

N.B. The information detailed above was correct as of July 2025. This information 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 6 - Proprietor entered on SCR by territory

The table below details the *proprietor* entered within the SCR for each Cognita territory.

Region	Country	SCR Proprietor
Europe and the USA	UK (inclusive of SSC & Group)	Regional CEO
	Spain	Regional CEO
	Italy	Regional CEO
	Switzerland	Regional CEO
	USA	Regional CEO
Asia	Head Office	Regional CEO
	Singapore	Head of School
	Hong Kong	Head of School
	Thailand	Head of School
	Vietnam	Head of School
	India	Regional CEO
Middle East	Head Office	Regional CEO
	UAE	Regional CEO
Latin America	Panama Head Office	Paula Nikotian
	Chile 1	Italo Taliercio Dalencon
	Chile 2	Angelica Soto
	Brazil	Beatriz Wild
	Mexico	Guillermo Cruz
	Colombia	Claudia Rincón

Ownership and consultation	
Document sponsor (role)	Group Chief Education Officer
Issuing authority	Cognita Holdings Limited
Operational owner	Head of Group Education Insight and Projects, Kristie Overton
Consultation on original policy	Group Legal Director Jayne Pinchbeck (March 2024) Regional Michael Drake, Regional CEO Europe (August 2022) Josep Caubet, Regional CEO LatAm (August 2022) Eric Van Den Berg, Regional CEO Asia (August 2022) Dave Baldwin, CEO Middle East (August 2022) Emily Lofting-Kisakye (March 2024) Safeguarding Reviewers Lucy Jeffreys, Safeguarding Review Team Leader (March 2024) Lisa Pittwood, Independent Reviewer (July 2025)

Audience	
Audience	Group Executive Team Regional Safeguarding Leads Regional HR Directors Independent Safeguarding Review Team

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 2022)

Version control			
Issue	Date	Author	Reason
01	07.07.2020	Simon Camby	New document
02	01.08.2022	Simon Camby	Revision
03	31.07.2023	Simon Camby	Annual Update
04	31.07.2024	Simon Camby	Annual Update
05	17.09.2025	Simon Camby	Significant update to take account of different regional structures. Detailed involvement of Lucy Jeffreys, Lisa Pittwood, Emily Lofting-Kisakye, Kristie Overton and Simon Camby.

Related documentation	Safeguarding Policy and Procedure in each school based on regional model
------------------------------	--