

# Group Policy: Serious Incident Reporting (in relation to Safeguarding and Health & Safety) August 2025



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## Part 1: Introduction

### Purpose

To outline a group-wide approach to the use of Serious Incident Report Forms ['SIRF'].

### Use of Serious Incidents and SIRF

SIRFs are used within Cognita to report serious incidents relating to Safeguarding and Health & Safety, including non-recent incidents. The detail within this document does not apply to SIRFs relating to other business areas.

The management of SIRFs is part of our wider commitment to maintaining a high-quality culture of care across Cognita. This culture of care is central to living out the Cognita global purpose: 'To thrive in a rapidly evolving world'.

Cognita ensures that serious incidents relating to Safeguarding and Health & Safety (including non-recent incidents) are approached proportionately and with relevant involvement from members of the Cognita team. The involvement of Cognita team members depends on the severity of each serious incident.

We work hard to ensure that we adopt a learning approach to our work. This is central to the SIRF review process. Discussing and agreeing lessons learned helps us to reflect and strengthen our processes for the good of all students and adults.

### Definition of Serious Incidents

The following parameters are provided to define a Serious Incident in relation to a Cognita school or the wider Cognita business. Serious Incidents require immediate action and formal reporting through the Serious Incident Reporting system.

1. A fatality or near fatality of a student whilst in our care.
2. A fatality or near fatality of an employee (or contractor/visitor whilst on our site).
3. Any event or situation that has caused or has the potential to cause significant harm to a key stakeholder\*.
4. Any event or situation involving a key stakeholder\* that has been deemed or is suspected to be a criminal offence by local authorities.
5. Any event or situation that causes significant reputational risk.
6. Any event or situation that has been reported to a relevant regulatory authority as recorded within this policy (see Appendix 01).

\*For this purpose, key stakeholders include students, members of staff, visitors to Cognita sites and members of the wider school community (e.g. parents).

## Part 2: Accountability, responsibility and escalation in Cognita regions

### Accountability and responsibility

The CEO in each region is accountable for ensuring that:

1. A system for managing serious incidents and the relevant SIRC reporting is in place that takes account of the size and structure of the region. This should include regular reporting channels to the Regional CEO and be regularly evaluated to ensure it is fit for purpose.
2. Written guidance, regarding the SIRC process, that is tailored to the local regulatory context is published by the regional team and updated annually.
3. A named person or persons in the region is/are responsible for management of the SIRC process, using the agreed group-wide template (see Appendix 02).
4. SIRC are escalated as outlined in this policy, aligned with our Duty of Candour.
5. A regional SIRC log is maintained utilising the consistent group-wide template and SIRC analysis is completed as part of the Annual Assurance Report.
6. Learning from an incident or incidents is intentionally shared to support continuous improvement within and beyond the region.
7. This policy is implemented in full by members of their regional team.

### Escalation within the region

The chart below outlines the defined group-wide escalation process that should be used in each Cognita region.

Level		Involvement
Level 1	Moderate	Regional Safeguarding Lead and/or Regional H&S Lead
Level 2	Important	Regional Safeguarding Lead and/or Regional H&S Lead and <u>information shared</u> with Regional Executive Team and Regional Legal Counsel.
Level 3	Critical	Regional Executive Team (including Regional CEO) <u>involvement</u> required

Each regional team is expected to clarify within their region-specific SIRC guidance:

- who should be involved and who is responsible for the escalation of SIRC at each of the three levels (in accordance with the information detailed with Appendix 03 of this document); and

- who is responsible for SIRF record keeping including the maintenance of the regional SIRF log.

### Part 3: Accountability, responsibility and escalation at Group Level

#### Accountability and responsibility

The Group Chief Education Officer is accountable for establishing a group-wide system for SIRF reporting and publishing to regions to ensure that accountability and responsibility for this work is clearly outlined.

The Group Chief Education Officer is responsible for the following actions (with involvement from the Group General Counsel):

1. Provide group-wide policy on the use of SIRFs, accompanying SIRF template and SIRF log template to ensure coherence across the Cognita system.
2. Maintain oversight of SIRFs escalated beyond the region and provide updates to the Group CEO and Cognita Board of Directors as appropriate.
3. Offer guidance on escalated SIRFs drawing on knowledge and learnings from across all regions.
4. Schedule regular meetings with the Group General Counsel and Head of Group Education Insight and Projects to review and update the Group SIRF Log. At the meeting it will be agreed who will lead on continuing oversight of each escalated SIRF and when each SIRF is closed at a Group monitoring level.
5. Ensure that there is a system in place for discussing common themes and lessons learnt from SIRFs across the Cognita group, included through shared learning meetings chaired by the Independent Safeguarding Review Team Leader or the Independent Health & Safety Review Team Leader.
6. Chair Lessons Learned meetings following the most serious incidents to ensure group-wide policy amendment and/or knowledge animation.

The Head of Group Education Insight and Projects is responsible for maintaining the Group SIRF Log and ensuring that arrangements are in place for the systematic collection and representation of SIRF data from each region.

#### Escalation beyond Cognita regions to group level

Regional CEOs are expected to put a system in place that ensures immediate escalation to group level (see below) where there are *immediate* reputational risks, legal/enforcement or external and/or public implications (including when related to a non-recent event).

The guiding criteria for an escalation beyond the region are:

- A concern about systemic organisation or region-wide safeguarding or health & safety matters.
- A fatality or near fatality of a student whilst in our care.
- A fatality or near fatality of an employee (or contractor/visitor whilst on our site).

- A serious matter relating to an employee of Cognita or student that has been referred to any local authority, law enforcement body, or regulatory body within a country (excluding routine referrals in a regulated jurisdiction).
- Incident that poses significant reputational risk to Cognita.

Where the incident aligns with one or more of the criteria listed above, the serious incident should be escalated (with the completed SIRC) by email to:

- Group General Counsel;
- Group Chief Education Officer;
- Group Chief People Officer; and
- Head of Group Education Insight and Projects.

The above group meet periodically to keep the Group-wide SIRC log under review via the Intelligent Accountability Dashboard.

#### **Part 4: Reporting**

Once per year each region will be asked to provide an overview of SIRC data, as part of their Annual Assurance Report. This document is used to prepare an Annual Board Report for each Cognita region.

## Appendix 01: Further detail regarding regulatory authorities

Across Cognita jurisdictions, there is considerable variation in the reporting expectations following a Health & Safety or Safeguarding incident. This table clarifies the different regulatory authorities that incidents are reported to and identifies where reporting to a specific regulatory authority would always prompt a SIRF to be opened.

Region	Country	An incident reported to this regulatory authority will <b>always</b> mean a 'SIRF' is opened (with reasoning). Detail includes both H&S and Safeguarding.	An incident reported to this regulatory authority will <b>not always</b> mean a 'SIRF' is opened (with reasoning). Detail includes both H&S and Safeguarding.
Asia	India	<b>Safeguarding -</b> <a href="#">Special Juvenile Police Unit</a> Mandatory reporting by all schools under the POCSO law for all sexual abuse and exploitation cases. Will have a significant impact on the child. Severe penalties for schools who fail to report through this law.  <b>H&amp;S - NA.</b>	<b>Safeguarding -</b> <a href="#">State/District Police</a> Often used for advice and guidance on less serious safeguarding concerns and will refer serious concerns to the Special Juvenile Police Unit if deemed appropriate.
	Hong Kong	<b>Safeguarding -</b> <a href="#">Hong Kong Police Force (HKPF)</a> Become involved in the most significant safeguarding concerns and triggers further referrals to agencies in Hong Kong. Police involvement indicates a high level of harm to a child or an individual related to the school has committed a serious criminal offence.  <b>H&amp;S -</b> <a href="#">Commissioner of labour</a> All incidents that require external reporting indicate serious harm.	<b>Safeguarding -</b> <a href="#">Family and Child Protective Service Unit</a> Mandatory reporting on most safeguarding concerns, including less serious concerns and can indicate less serious harm to a child. Note: Significant safeguarding concerns referred will lead to the raising of a SIRF. (Mandatory reporting law comes into effect January 2026).
	Thailand	<b>Safeguarding -</b> <a href="#">Royal Thai Police (RTP)</a> Only become involved in the most serious safeguarding concerns indicating a child has suffered significant harm or an individual related to the school has committed a serious criminal offence.  <b>H&amp;S -</b> <a href="#">NA</a>	
	Singapore	<b>Safeguarding -</b> <a href="#">Singapore Police Force (SPF)</a> Only become involved in the most serious safeguarding concerns indicating a child has suffered significant harm or an individual	<b>Safeguarding -</b> <a href="#">MSF Child Protective Services</a> Require safeguarding reporting for some minor safeguarding concerns. Note: MSF will also become involved in



		<p>related to the school has committed a serious criminal offence.</p> <p><b>Internal Security Department</b> For the reporting of terrorism related offences and concerns.</p> <p><b>H&amp;S -</b> <b>Ministry of manpower (MOM) for list of reportable accidents</b> All incidents that require external reporting indicate serious harm.</p> <p><b>National Environment Agency (NEA) for environment concerns</b> All incidents that require external reporting indicate serious harm.</p>	<p>more serious safeguarding concerns prompting a SIRF when appropriate.</p> <p><b>National Anti-Violence &amp; Sexual Harassment Helpline (NAVH)</b> Used to report concerns around Domestic Abuse and Violence in the home. Significant Domestic Abuse concerns would be reported to MSF or SPF and could lead to a SIRF being raised.</p>
	Vietnam	<p><b>Safeguarding -</b> <b>Vietnam People's Police Force</b> Will only become involved in the most serious safeguarding concerns indicating a child has suffered significant harm or an individual related to the school has committed a serious criminal offence.</p> <p><b>Ministry of Public Security</b> Used for the reporting of terrorism related offences and concerns.</p> <p><b>H&amp;S -</b> <b>Ministry of labour</b> all incidents that require external reporting indicate serious harm.</p>	<p><b>Safeguarding -</b> <b>National Hotline for Child Protection</b> Often used for guidance and advice for less serious safeguarding concerns. Note: Can also be utilised for more serious safeguarding concerns indicating a child has suffered significant harm.</p>
	Korea	<p><b>Safeguarding -</b> <b>National Child Protection Agency</b> Due to mandatory reporting requirements of certain types of child abuse, indicating a child has suffered significant harm.</p> <p><b>Korean National Police Agency</b> Currently unknown on the role they play in safeguarding concerns but legislation indicates they will become involved when a child has suffered significant harm.</p> <p><b>H&amp;S -</b> <b>Ministry of employment and labour</b> All incidents that require external reporting indicate serious harm.</p>	
Europe and USA	Italy	<p><b>Safeguarding and H&amp;S incidents</b> <b>Police</b> The Police will be contacted if the serious incident indicates that a</p>	<p><b>H&amp;S -</b> <b>Local Fire Authority</b> This may be an incident related to a fire at the premises, or a visit by Fire</p>

		criminal offence has occurred/is likely to occur and/or if an individual is in imminent danger.	Authority whereby school is non-compliant with local legislation or receives enforcement.
	Spain	<b>Safeguarding and H&amp;S incidents</b> <b>Police</b> The Police will be contacted if the serious incident indicates that a criminal offence has occurred/is likely to occur and/or if an individual is in imminent danger.	<b>H&amp;S -</b> <b>Local Fire Authority</b> This may be an incident related to a fire at the premises, or a visit by Fire Authority whereby school is non-compliant with local legislation or receives enforcement.  <b>Mutua</b> (Spanish Insurer), incidents reportable for worker related accidents.
	United Kingdom	<b>Safeguarding and H&amp;S incidents</b> <b>Police</b> The Police will be contacted if the serious incident indicates that a criminal offence has occurred/is likely to occur and/or if an individual is in imminent danger.	<b>Safeguarding</b> <b>LADO</b> The Local Authority Designated Officer is responsible for managing allegations against adults who work with children. They will be contacted if the serious incident definitely/potentially meets the 'harm tests' for an allegation (KCSIE).  <b>H&amp;S -</b> <b>Local Fire Authority</b> This may be an incident related to a fire at the premises, or a visit by Fire Authority whereby school is non-compliant with local legislation or receives enforcement.  <b>HSE</b> Health and Safety Executive – UK Regulator for workplace health and safety. Incidents reported under RIDDOR.  <b>Ofsted</b> Non ministerial department of UK Government in England that inspects and regulates education, training and social care services. Serious childcare incidents reported to Ofsted for registered provision.  <b>UKHSA</b> UK Health Security Agency prevents, prepares, and responds to infectious, diseases and environmental hazards. Notification of outbreaks of infectious diseases.
	Greece	<b>Safeguarding and H&amp;S incidents</b> <b>Police</b> The Police will be contacted if the serious incident indicates that a criminal offence has occurred/is	<b>H&amp;S -</b> <b>Local Fire Authority</b> This may be an incident related to a fire at the premises, or a visit by Fire Authority whereby school is non-

		likely to occur and/or if an individual is in imminent danger.	compliant with local legislation or receives enforcement.
	United States	<b>Safeguarding and H&amp;S incidents</b> <a href="#">Police</a> The Police will be contacted if the serious incident indicates that a criminal offence has occurred/is likely to occur and/or if an individual is in imminent danger.	<b>H&amp;S -</b> <a href="#">Local Fire Authority</a> this may be an incident related to a fire at the premises, or a visit by Fire Authority whereby school is non-compliant with local legislation or receives enforcement.
	Switzerland	<b>Safeguarding and H&amp;S incidents</b> <a href="#">Police</a> The Police will be contacted if the serious incident indicates that a criminal offence has occurred/is likely to occur and/or if an individual is in imminent danger.	<b>H&amp;S -</b> <a href="#">Local Fire Authority</a> this may be an incident related to a fire at the premises, or a visit by Fire Authority whereby school is non-compliant with local legislation or receives enforcement.
Middle East	Kuwait	<b>Safeguarding and H&amp;S incidents</b> <a href="#">N/A</a>	<b>Safeguarding -</b> <a href="#">Police/ Civil Defence/ Local Municipality Ministry of Health</a> Decision regarding SIRF made when considering contextual factors relating to the incident.  <b>H&amp;S -</b> <a href="#">Police/ Ministry of Health/ Civil Defence</a> This may be an incident related to a fire at the premises, or a visit by Civil Defence whereby school is non-compliant with local legislation or receives enforcement.
	UAE	<b>Safeguarding and H&amp;S incidents</b> <a href="#">N/A</a>	<b>Safeguarding</b> <a href="#">All Emirates – Ministry of Education</a> Decision regarding SIRF made when considering contextual factors relating to the incident.  <a href="#">Child Protection Unit/ Local Police Authority</a> Decision regarding SIRF made when considering contextual factors relating to the incident.  <a href="#">Abu Dhabi – ADEK</a> Decision regarding SIRF made when considering contextual factors relating to the incident.  <a href="#">Dubai – KHDA/ Dubai Women &amp; Children's Foundation</a> Decision regarding SIRF made when considering contextual factors relating to the incident.

			<p><b>H&amp;S –</b>  <a href="#">All Emirates – Police/ Civil Defence/ Local Municipality</a>  Decision regarding SIRC made when considering contextual factors relating to the incident.</p> <p><a href="#">Abu Dhabi – Abu Dhabi Public Health Centre (ADPHC)</a>  Decision regarding SIRC made when considering contextual factors relating to the incident.</p> <p><a href="#">Dubai – Dubai Health Authority (DHA)</a>  Decision regarding SIRC made when considering contextual factors relating to the incident.</p>
	Oman	<p><b>Safeguarding and H&amp;S incidents</b>  <a href="#">N/A</a></p>	<p><b>H&amp;S -</b>  <a href="#">Police/ Civil Defence/ Local Municipality</a>  Decision regarding SIRC made when considering contextual factors relating to the incident.</p> <p><b>Safeguarding -</b>  <a href="#">Police/ Ministry of Social Development (Child Protection Unit)</a>  Decision regarding SIRC made when considering contextual factors relating to the incident.</p>
	Saudi Arabia	<p><b>Safeguarding and H&amp;S incidents</b>  <a href="#">N/A</a></p>	<p><b>H&amp;S -</b>  <a href="#">Police/ Civil Defence/ Local Municipality</a>  Decision regarding SIRC made when considering contextual factors relating to the incident.</p> <p><b>Safeguarding -</b>  <a href="#">Police/ Saudi Arabia National Family &amp; Safety Programme</a>  Decision regarding SIRC made when considering contextual factors relating to the incident.</p>
	Qatar	<p><b>Safeguarding and H&amp;S incidents</b>  <a href="#">N/A</a></p>	<p><b>H&amp;S -</b>  <a href="#">Police/ Civil Defence/ Local Municipality/ National Human Rights Committee of Qatar</a>  Decision regarding SIRC made when considering contextual factors relating to the incident.</p> <p><b>Safeguarding -</b>  <a href="#">Police</a>  Decision regarding SIRC made when considering contextual factors relating to the incident.</p>

Latin America	Chile	<p><b>Safeguarding</b>  <b>PDI (Police)</b>  The Police will be contacted if the serious incident indicates that a criminal offence has occurred/is likely to occur and/or if an individual is in imminent danger.</p> <p><b>Fiscalía/Tribunal de Familia (Family Court)</b>  The family court will be contacted if a serious safeguarding incident occurred/is likely to occur and/or if an individual is in imminent danger (mandatory by local legislation, such as family conflicts, child protection, parental rights, child abduction custody disputes, etc).</p> <p><b>Ministerio Publico (Public Ministry)</b>  The Public Ministry can be contacted if a child protection incident occurred/is likely to occur and/or if an individual is in imminent danger or their rights are being violated physically or emotionally.</p> <p><b>H&amp;S</b>  <b>SENAPRED- National Service for Disaster Prevention and Response</b>  The National Service for Disaster Prevention and Response can be engaged in various cases, including geological events, hydrometeorological phenomena such as floods and droughts, atmospheric events including wildfires, and other situations requiring disaster risk management. mitigation, preparedness, response, and recovery.</p> <p><b>Defensa Civil (Civil Defense)</b>  Civil Defense should be contacted in situations of immediate risk to the population, such as fires, floods, earthquakes, collapse of structures, falling poles or trees, and any other emergency that requires assistance and community support from its volunteers trained in first aid, rescue and psychological support.</p>	<p><b>Safeguarding</b>  <b>OPD (Oficina de protección de derechos-Human Rights Office)</b>  The Office for the Protection of the Rights of Children and Adolescents (OPD) will be contact in situations that may range from low-level violations to high-level violations, such as physical or psychological abuse, sexual abuse, or exploitation. If the violation constitutes a crime, it must be reported to the police or judicial authorities and lead to the opening of a SIRF</p> <p><b>H&amp;S</b>  <b>SL (Labor Security Institute)</b>  Occupational services - incidents of different severity levels must be reported to this agency, ranging from a broken bone to a fatality. Only some of these incidents will lead to the opening of a SIRF.'</p> <p><b>Local Fire Authority</b>  This may be an incident related to a fire at the premises, or a visit by Fire Authority whereby school is non-compliant with local legislation or receives enforcement.</p>
	Brazil	<p><b>Safeguarding</b>  <b>Conselho Tutelar (Tutelar Council)</b>  The Tutelar Council will be contacted if a child protection</p>	<p><b>H&amp;S-</b>  <b>INSS (National Institute of Social Security)</b></p>

		<p>incident occurred/is likely to occur and/or if an individual is in imminent danger or their rights are being violated or threatened physically or emotionally (mandatory by local legislation, such as child abuse, neglect, risky behaviours, serious mental health situations, Peer and peer abuse, etc).</p> <p><b>Police</b> The Police will be contacted if the serious incident indicates that a criminal offence has occurred/is likely to occur and/or if an individual is in imminent danger.</p> <p><b>Ministerio Publico (Public Ministry)</b> The Public Ministry can be contacted if a child protection incident occurred/is likely to occur and/or if an individual is in imminent danger or their rights are being violated physically or emotionally.</p> <p><b>H&amp;S</b> <b>Defensa Civil (Civil Defense)</b> Civil Defense should be contacted in situations of immediate risk to the population, such as fires, floods, earthquakes, collapse of structures, falling poles or trees, and any other emergency that requires assistance and community support from its volunteers trained in first aid, rescue and psychological support.</p>	<p>Occupational services - incidents of different severity levels must be reported to this agency, ranging from a broken bone to a fatality. Only some of these incidents will lead to the opening of a SIRF.'</p> <p><b>Local Fire Authority</b> this may be an incident related to a fire at the premises, or a visit by Fire Authority whereby school is non-compliant with local legislation or receives enforcement.</p>
	Mexico	<p><b>Safeguarding</b> <b>DIF (social and family welfare offices)</b> The DIF will be contacted if a child protection incident occurred/is likely to occur and/or if an individual is in imminent danger or their rights are being violated or threatened physically or emotionally (mandatory by local legislation, such as child abuse, neglect, risky behaviours, serious mental health situations, Peer and peer abuse, etc).</p> <p><b>Police</b> The Police will be contacted if the serious incident indicates that a criminal offence has occurred/is likely to occur and/or if an individual is in imminent danger.</p> <p><b>Emergency services</b></p>	<p><b>Safeguarding</b> <b>SEP (Ministry of Education), UNAM.</b> The Ministry of Education should be engaged in child protection cases when there are suspicions of abuse, neglect, or harm to a child within the educational setting, such as on campus, school transportation, or school-organized activities. This engagement can range from investigating reports, developing protective policies, providing guidance to staff, to collaborating with other agencies to ensure the child's safety and well-being. If the violation constitutes a crime, it must be reported to the DIF, police or judicial authorities and lead to the opening of a SIRF</p> <p><b>H&amp;S</b> <b>STPS- Secretary of Labor and Social Security, Labor Inspection, and conciliation and arbitration</b></p>

		<p>Emergency services can be contacted if a child protection incident occurred/is likely to occur and/or if an individual is in imminent danger or their rights are being violated or threatened physically or emotionally</p> <p><b>H&amp;S</b>  <a href="#">Protección Civil (Civil Defence)</a>            Civil Defence should be contacted in situations of immediate risk to the population, such as fires, floods, earthquakes, collapse of structures, falling poles or trees, and any other emergency that requires assistance and community support from its volunteers trained in first aid, rescue and psychological support.</p>	<p>Occupational services - incidents of different severity levels must be reported to this agency, ranging from a broken bone to a fatality. Only some of these incidents will lead to the opening of a SIRF.'</p> <p><a href="#">Local Fire Authority</a>            this may be an incident related to a fire at the premises, or a visit by Fire Authority whereby school is non-compliant with local legislation or receives enforcement.</p>
	Colombia	<p><b>Safeguarding</b>  <a href="#">CBF- (Social and family Welfare offices)</a>            The CBF will be contacted if a child protection incident occurred/is likely to occur and/or if an individual is in imminent danger or their rights are being violated or threatened physically or emotionally (mandatory by local legislation, such as child abuse, neglect, risky behaviours, serious mental health situations, Peer and peer abuse, etc).</p> <p><a href="#">Police</a>            The Police will be contacted if the serious incident indicates that a criminal offence has occurred/is likely to occur and/or if an individual is in imminent danger.</p> <p><a href="#">Emergency services</a>            Emergency services can be contacted if a child protection incident occurred/is likely to occur and/or if an individual is in imminent danger or their rights are being violated or threatened physically or emotionally</p> <p><a href="#">Ombudsman</a>            The ombudsman can be contacted to seek protection from human rights violations or arbitrary acts (Defensoría del Pueblo). The Ombudsman's Office defends and promotes the human rights of inhabitants in Colombia and abroad</p> <p><b>H&amp;S</b></p>	<p><b>H&amp;S</b>  <a href="#">Health Services, ARL (occupational insurance providers)</a>            Occupational services - incidents of different severity levels must be reported to this agency, ranging from a broken bone to a fatality. Only some of these incidents will lead to the opening of a SIRF.'</p> <p><a href="#">Local Fire Authority</a>            this may be an incident related to a fire at the premises, or a visit by Fire Authority whereby school is non-compliant with local legislation or receives enforcement.</p>

		<p>UNGRD- national unit for disaster risk management or Defensa Civil (Civil Defense)</p> <p>Civil Defense should be contacted in situations of immediate risk to the population, such as fires, floods, earthquakes, collapse of structures, falling poles or trees, and any other emergency that requires assistance and community support from its volunteers trained in first aid, rescue and psychological support.</p>	
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## Appendix 02: Group-wide template for SIRC reporting

SERIOUS INCIDENT REPORT FORM									
Privileged for the use of the company legal advisers.									
COGNITA									
<b>[1] INCIDENT STATUS</b>									
<input type="checkbox"/>	<b>Status [R]</b> Continuing risk. Fact finding not started, root causes not determined.								
<input type="checkbox"/>	<b>Status [A]</b> No immediate risk. Fact finding ongoing with interim control measures in place.								
<input type="checkbox"/>	<b>Status [G]</b> Investigation completed. Fact finding completed and learning established.								
<b>[2] INCIDENT DETAILS</b>									
<input type="checkbox"/>	Health & Safety				<input type="checkbox"/>	Safeguarding			
SIRF Reference Number (To be completed by region)									
<b>[3] REPORTING REQUIREMENT</b>									
Compulsory					Additional escalation if required				
Head of School / Principal	General Manager / Director of Education (where there is no GM) (REGION)				CEO	IT Director	HR	Chief Accounting Officer	Director of Finance (REGION)
									<input type="checkbox"/>
					General Coordinator	DSL	Manager	Manager	School Facilities Manager
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>[4] DETAIL OF LOCATION AND PERSON REPORTING</b>									
School/Office name									
School campus/site (if applicable)									
Additional information regarding location (Please insert free text, if applicable)									
School contact completing SIRC (insert name)									
Date SIRC completed (DD/MM/YYYY)					Click or tap to enter a date.				
Named contact for management of SIRC in school (insert name)									
Date of incident (DD/MM/YYYY)					Click or tap to enter a date.				
Time of incident									
Was a staff member present when the incident occurred? If yes, please confirm name and role.									
Email address & Telephone no. for management of SIRC (information for 'named contact' above)									

Orange boxes to be completed by the Cognita Regional Team.

## SERIOUS INCIDENT REPORT FORM (SIRF)

**[4] INCIDENT DETAILS**

Note that this may be a summary if a more detailed accident/incident report is attached.

<b>Location of incident</b> (Select from list)	Choose an item.
<b>Type of person primarily impacted by this incident</b> (Select from list)	Choose an item.
<b>If student, please select student age</b> (Select from list)	Choose an item.
If incident involved students of multiple ages, please add other age	Choose an item.
If incident involved students of multiple ages, please add other age	Choose an item.
If incident involved students of multiple ages, please add other age	Choose an item.
If incident involved students of multiple ages, please add other age	Choose an item.
<b>Name of the impacted person(s)</b>	
<b>If staff member, contractor or volunteer, please confirm role/occupation</b>	
<b>Date &amp; time parents contacted.</b> (if incident involved student(s))	
<b>Date &amp; time next of kin contacted.</b> (if incident involved adult(s))	

**[5] DESCRIPTION OF INCIDENT**

<b>Timeline of events</b> Insert free text, include (if relevant): <ul style="list-style-type: none"> <li>o details from victim and witness <u>statement</u>.</li> <li>o CCTV and photo <u>evidence</u>.</li> <li>o witness statements.</li> </ul> Do not photograph the individual's injuries but note them on a body map.	
<b>Action taken immediately.</b> Insert free text, include details of first aid and/or interim measures put in place.	
<b>Description of injury/damage</b> (Insert free text)	
<b>Please provide any relevant further detail regarding incident</b> (Insert free text)	
<b>Was there media / social media coverage of the incident?</b> (Insert free text)	

## SERIOUS INCIDENT REPORT FORM (SIRF)

<b>Was an external agency informed?</b>	Choose an item.
<b>If yes, which external agency?</b> (Insert free text)	

**[6] CHECKLIST OF EVIDENCE ATTACHED**

Details	Attached	N/A	File Name
1. Photographs and/or CCTV footage*	<input type="checkbox"/>	<input type="checkbox"/>	
2. Accident/Incident Investigation Report	<input type="checkbox"/>	<input type="checkbox"/>	
3. Relevant school policies & procedures	<input type="checkbox"/>	<input type="checkbox"/>	
4. Existing risk assessments	<input type="checkbox"/>	<input type="checkbox"/>	
5. Post-accident/Incident risk assessments	<input type="checkbox"/>	<input type="checkbox"/>	
6. Parents correspondence	<input type="checkbox"/>	<input type="checkbox"/>	
7. Enforcement correspondence (police or regulatory body)	<input type="checkbox"/>	<input type="checkbox"/>	
8. Training/Competency records	<input type="checkbox"/>	<input type="checkbox"/>	
9. Medical records	<input type="checkbox"/>	<input type="checkbox"/>	
10. Statements (victim and witnesses) *	<input type="checkbox"/>	<input type="checkbox"/>	
11. Maintenance records	<input type="checkbox"/>	<input type="checkbox"/>	
12. Statutory notification/Insurance company notification	<input type="checkbox"/>	<input type="checkbox"/>	
13. Others (please list):	<input type="checkbox"/>	<input type="checkbox"/>	

*Note 1: Photos or videos may be taken of the location/environment where the accident occurred and of the injury sustained. Where there is any concern relating to child welfare or safeguarding issues then photographs of the child are not to be taken. Body maps must be completed for cases with physical injury.*

*Note 10: Mark all draft statements; 'Privileged for the use of the company legal advisers'*

## SERIOUS INCIDENT REPORT FORM (SIRF)

**[7] LEARNINGS ESTABLISHED – FOR THE LOCATION WHERE THIS HAPPENED**

This section to be completed by a member of the school team.

<b>How and <u>why</u> this happened.</b> <i>List in chronological order; root cause analysis - establish initiating event from which all other causes or failings arose; establish underlying cause.</i>	
<b>Corrective/Preventative actions taken</b>	
<b>Preventative actions still to be taken.</b>	

**[8] RISK ASSESSMENT**

If relevant

	Status	Yes	No	N/A
Risk assessment in place		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Risk assessment reviewed		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**[9] LEARNINGS ESTABLISHED – FOR THE COGNITA SYSTEM**

This section to be completed by a member of the regional team.

<b><u>Actions taken as a result of this incident.</u></b>	
<b><u>Actions to be taken as a result of this incident.</u></b> <i>Include time scale and person responsible.</i>	
<b><u>Actions to be taken in other areas of your work as a result of learning from this incident (if relevant).</u></b> <i>Include time scale and person responsible.</i>	

## Appendix 03: Regional Accountability and Responsibility for SIRF Reporting and Management

**Accountability:** Accountability for SIRF reporting sits with the Regional CEO.

**Responsibility:** The table below outlines where responsibility for the management and reporting of SIRFs sits within each Cognita region as defined by each Regional CEO.

	Staff member(s) nominated by the Regional CEO to oversee the <b>SIRF process</b> , ensuring that this SIRF Policy is understood and implemented	Staff member(s) nominated by the Regional CEO for maintaining <b>Regional SIRF log</b> and taking responsibility for SIRF Reporting	Staff member(s) nominated for providing <b>legal expertise</b> in relation to the SIRF Process
<b>Asia</b>	Colin Sinclair	Glen Hookway (Safeguarding)  Mark Yeo (H+S)  Gwen Yeo (Employee related)	Terence Lin (Legal Counsel Asia)  Legal Counsel Asia to provide legal expertise (as required) in relation to SIRFs occurring within the region.  Legal Counsel Asia is copied into all SIRFs occurring within the region.
<b>Europe &amp; USA</b>	Sarah Reynolds	Alison Barnett (Safeguarding)  Melissa Jones (H+S)  Vicky Kidd (Employee related)	Tim Merritt (Head of Legal, Europe and North America)  Legal Counsel to provide expertise (as required) in relation to SIRFs occurring within the region.  Legal Counsel is copied into all SIRFs occurring within the region.
<b>LatAm</b>	Sixto Joyanes (excluding for SIRFs occurring in Chile Middle Market, which are overseen by Felipe Horta)	<u>Mexico:</u> - Guadalupe Treviño (H&S) - Sandra Ascencio (Safeguarding)  <u>Colombia:</u> - Lorena Daraviña (H&S) - Juan Pablo Rueda (Safeguarding)  <u>Brazil:</u> - Vanda Ulliana  <u>Chile Upper Market:</u> - Cinthya Barriga (H&S) - Rosario Borel (Safeguarding)  <u>Panama:</u>	Jayne Pinchbeck (Group General Counsel)  Group General Counsel to provide expertise (as required) in relation to SIRFs occurring within the region.

		<p>- Sixto Joyanes</p> <p><u>Chile Middle Market:</u></p> <p>- Fabiola Sandoval (H&amp;S)</p> <p>- Gretchen Beiza (Safeguarding)</p> <p>Paula Nikotian (Employee related)</p>	
<b>Middle East</b>	Ian Wallace	<p>Kirsty Clarke (Safeguarding)</p> <p>Pauline Bruce (H+S)</p>	<p>Samantha Ellaby (Head of Legal, Middle East)</p> <p>Legal Counsel to provide expertise (as required) in relation to SIRFs occurring within the region.</p> <p>Legal Counsel is copied into all SIRFs occurring within the region.</p>

<b>Ownership and consultation</b>	
Document sponsor	Group Chief Education Officer
Issuing authority	Cognita Holdings Limited
Technical owner	Kristie Overton, Head of Group Education Insight and Projects
Consultation	<p><u>Group</u> Jayne Pinchbeck, Group General Counsel (Apr 2024)</p> <p><u>Regional</u> Gwen Yeo, Regional COO Asia (May 2024) Sixto Joyanes, Regional COO LatAm (May 2024) Paula Nikotian, HR Director LatAm (May 2024) Alison Barnett, Regional Safeguarding Lead Europe (May 2024) Melissa Jones, Regional Health &amp; Safety Lead Europe (May 2024) Emily Lofting-Kisakye, Regional HR Director Europe (February 2024) Lizzie Varley, School Improvement Partner Middle East (May 2024) Samantha Ellerby, Head of Legal Middle East (May 2024)</p>

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

<b>Document application and publication</b>			
<b>Asia</b>	<b>Europe &amp; USA</b>	<b>Lat Am</b>	<b>Middle East</b>
Yes	Yes	Yes	Yes

<b>Implementation and Review</b>	
Implementation date	September 2025

<b>Version control</b>			
<b>Issue</b>	<b>Date</b>	<b>Author</b>	<b>Reason</b>
01	18.08.22	Simon Camby	Revision
02	03.05.23	Simon Camby	Update to include group responsibilities and annual reporting detail
03	31.07.23	Simon Camby	Annual Update
04	01.05.24	Simon Camby	Annual Update incorporating minor amends to reflect feedback from Farrer & Co. external review in 2024
05	29.08.2025	Simon Camby	Annual Update incorporating minor amends to reflect feedback from Farrer & Co. external review in 2025