

Incident Reporting and Management Policy

Middle East

Kuwait

Oman

Qatar

Saudi Arabia

United Arab Emirates

Contents

1. Purpose	3
2. Scope	3
3. Definitions	3
4. Responsibilities	4
5. Incident Reporting Platform	4
6. Reporting Timeframes	4
7. Escalation and Communication	5
8. Notification to Authorities	5
9. Investigation	6
10. Learning	6
11. Data Protection, Confidentiality and Retention	7
12. Document Control	8

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1. Purpose

Cognita Middle East is committed to health, safety, wellbeing and continuous improvement. This policy establishes a consistent approach to the reporting, recording, classification and investigation of incidents to promote a culture of learning, continuous improvement and regulatory compliance. It supports timely communication, root cause analysis and the prevention of reoccurrence in line with OSHAD SF (Mechanism 6 & 11), ISO 45001 and relevant local legislation.

2. Scope

This policy applies to all Cognita Middle East schools, nurseries and regional operations. It covers:

- All students, staff, contractors and visitors
- All types of incidents, including near misses, ill health and accidents. Near misses must be recorded with the same importance as incidents resulting in injury, as they provide critical opportunities to prevent harm.
- All activities related to the school, Regional Hub or Enrich ME, whether they are onsite, off site or occur during, or outside of, regular operating hours.

3. Definitions

Incident	Any unplanned event resulting in, or with the potential to cause, harm or damage.
Near Miss	An unplanned event that did not result in harm but had the potential to do so.
Minor Incident	Treated on site, first aid only.
Major Incident	Injury requiring further medical intervention or potential external reporting.
Serious Incident	Fatality, life-threatening injury or an event with significant impact on operations, reputation or regulatory compliance.
Dangerous Occurrence	An unplanned event causing damage but no injury.
Lost Time Incident	Absence from work or lessons for at least one whole day due to a work/school related injury or illness.
Unsafe Act	Any action by an individual that deviates from accepted safe procedures or practices, increasing the risk of an accident.
Unsafe Condition	A physical or environmental hazard in the workplace that could lead to injury or illness if not corrected.
Property Damage	An incident that causes harm to buildings, equipment, vehicles or any other physical asset.

Level	Typical Examples
Minor	First aid managed by school clinic, minor cuts, bruises, communicable diseases etc.
Major	Injury requiring hospital or specialist follow up; fractures, deep lacerations, head injuries, contractor injury, ambulance called
Serious	Fatality, life threatening injury, hospital admission, structural collapse, fire, incident likely to attract regulatory or media attention

4. Responsibilities

Principal/Superintendent	holds overall accountability for the implementation of this policy within their school. They are responsible for ensuring any reportable incidents are escalated to the relevant authorities in accordance with local legislation.
Health and Safety Lead	is responsible for ensuring incident reports have been checked and where further action or investigation may be required, this is completed. They are also responsible for ensuring Serious Incident Reports are completed in line with policy. Key findings from any incidents, including patterns and trends or lessons learned should also be shared with the Health and Safety Committee.
School Operations Manager	is responsible for ensuring corrective measures are followed up, support with investigations and inform the Cog Head of Operations of key incidents.
Medical Teams	are responsible for reporting all accidents that are attended by the medical team and communicable illnesses that occur.
First Aiders	are responsible for reporting any incidents where they administered first aid, whether on or off site.
Regional Head of H&S	is responsible for oversight, trend analysis, escalation as defined in the Emergency Response procedure and termly reporting to the Regional Assurance Board.
Cog Managing Directors	are responsible for setting clear expectations about health and safety performance, maintain visibility through regular engagement and ensuring that serious incidents and emerging risks are reviewed as part of routine executive oversight and assurance process
Crisis Management Team	are in place to support the management of critical incidents as per the Emergency Response Procedures and Crisis Management policy.

5. Incident Reporting Platform

All incidents must be logged on the incident reporting platform. Integrated and new schools will use Evolve Accident Book. Schools joining Cognita Middle East may continue to report through their regular channels during the integration period, with the intent to transition to the Cognita Middle East reporting platform by Stage 3 of integration.

6. Reporting Timeframes

Severity	Initial Report	Escalation	Investigation Completion
Minor	Within 48 hours	N/A	Within 7 days, if required
Major	Within 24 hours	Principal/SLT	Within 14 days, if required
Serious	Immediate (by phone)	Regional Health and Safety Lead	Within 72 hours, initial review

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Reporting must not be delayed while facts are being gathered or investigations are underway. The Group Serious Incident Reporting Guidance must be followed for the SIRF process.

7. Escalation and Communication

Cognita Middle East operates a defined and proportionate communication chain to ensure that incidents are escalated appropriately, consistently and without delay. The purpose of this escalation is to enable timely operational support, leadership oversight and informed decision making.

School Level Communication

- All incidents must be reported on to EVOLVE Accident Book
- For major and serious incidents, immediate verbal notification must occur in parallel with the reporting platform
- The School H&S Lead should ensure SLT are aware of all major/serious incidents
- The person reporting the incident on to the EVOLVE Accident Book platform can initiate a notification email, as relevant, to key persons

Regional Escalation

- The school's H&S Lead must notify the Regional Head of Health and Safety of any serious incidents, immediately by phone
- Where incidents have operational, reputational, safeguarding or regulatory implications, the Regional Head of Health and Safety will coordinate escalation to:
 - Cog Managing Director
 - Crisis Management Team (where applicable)
- The school's Operations/Facilities Management ensures communication with the Cog Head of Operations for relevant incident discussion

Executive Notification

- The Cog MD will be informed of all serious incidents as soon as practicable following initial notification.
- Executive notification is typically led by the Regional Head of Health and Safety in coordination with Operations to ensure:
 - Consistent messaging
 - Clarity on known facts
 - Agreed next steps

Ongoing Communication and Updates

- Following initial escalation, updates must be provided at agreed intervals until the incident is closed or stabilised, being managed solely at school level
- Communication must remain factual, proportionate and controlled, avoiding speculation or the forwarding of unverified information
- Any external communication must be in line with the *Cognita Middle East Communications policy*

8. Notification to Authorities

Cognita Middle East schools, nurseries and businesses are required to comply with all applicable national and local regulatory requirements regarding incident reporting. Local laws and expectations vary from location to location and may require the school to notify authorities of specific types of incidents. These may include, but are not limited to:

- Fatalities or life-threatening injuries

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- Serious injuries requiring hospitalisation
- Occupational illnesses or communicable disease outbreaks
- Fires, structural collapse or significant environmental events
- Security related incidents or any event requiring police or emergency response
- Any incident where there is a reasonable indication that it may have resulted from a potential breach of safety standards, procedures or legal obligations
- School closure

The Principal/Superintendent is responsible for ensuring that all reportable incidents are notified to the relevant authority in a timely and accurate manner, in accordance with local requirements. They may be supported in this process by the school's Health and Safety Lead, SLT and key administrators.

If there is any uncertainty about whether an incident should be reported, the school should consult with the Regional Head of Health and Safety and the Regional Head of Legal.

9. Investigation

Not all incidents will require a formal investigation. The decision to investigate is based on the nature, severity and potential learning value of the incident. The Principal, Health and Safety Lead or SLT may decide to have an incident investigated. The Regional Head of Health and Safety or Cog Head of Operations may also request an investigation is conducted if there is an identified pattern and trend.

Where required, investigations must be:

- Proportionate to the incident
- Conducted by competent staff
- Attached to the incident report on the incident reporting platform
- May contain witness statements, CCTV reviews, in accordance with Cognita Middle East CCTV policy, or external documents such as medical reports

The purpose of any investigation is to identify what happened, why it happened and what actions can prevent a reoccurrence, not to assign blame. Where relevant, root cause analysis and supporting documentation (e.g. risk assessments, photos, witness statements) should be included.

Not all incidents that have been investigated require a SIRF, however, please seek guidance from the Principal, Health and Safety Lead, or the Regional Head of Health and Safety if unsure.

It is essential to preserve the scene of the incident in order to successfully collect required evidence. When conducting minor investigations, HS Form 14 – Incident Investigation may be used. All other major and serious incidents should be conducted using the SIRF form. HS Form 15 – Witness Statement is also available for capturing witness statements. Incidents must be investigated by the School Health and Safety Lead or a member of SLT.

10. Learning

All incidents, regardless of whether a full investigation is required, present an opportunity for learning and growth. Schools are encouraged to reflect on incidents, including near misses and share learning internally via the health and safety committee, staff meetings, briefings or other preferred methods. The Regional Head of Health and Safety will analyse trends across all business units and share key insights within the Health and Safety Networks and Medical Networks. Regional incident insights will be shared with Principals and Regional Leaders on a termly basis, whilst maintaining confidentiality.

11. Data Protection, Confidentiality and Retention

All incident reports and associated documentation must be treated with appropriate confidentiality and handled in line with the *Cognita Middle East's Data Protection policy and Data Retention policy*. Sensitive documents - such as medical notes, witness statements and CCTV footage - must be securely stored on a Cognita device. Incident details or documents must never be captured on personal devices.

Any incident with legal, reputational or safeguarding implications should be flagged immediately to the Regional Head of Health and Safety or Regional Head of Safeguarding and the Regional Head of Legal.

Photographs of injuries must not be taken. Injuries should be clinically described by the medical team.

12. Document Control

Ownership and Consultation	
Document sponsor (role)	Regional Head of Health and Safety
Document author (role)	Regional Head of Health and Safety
Legal advice	Head of Legal
Consultation	School Principal/Superintendent Regional Head of Safeguarding Cog Head of Operations Director of Education
Document review and maintenance	Every two years

Compliance	
Compliant with	OSHAD SF Mechanisms 6 & 11 ISO 45001:2018 Clauses 10.2 and 10.3 MOE UAE OEHSMS Guidelines Local Labour and Education Regulators for GCC International best practice

Audience	
Internal	All staff – Middle East
External	N/A

Document Application	
Regional	Middle East

Version Control	
Implementation date	06/05/2026
1 st review date	05/05/2028 (every two years thereafter)

Related Documentation	
Related documentation	Group SIRF Guidance Incident Reporting Training