

16. Financial Management

16. Financial Management

Introduction

Sound financial management is fundamental to ELI Schools' sustainability, regulatory compliance, and ability to deliver quality education to international learners. Effective financial management ensures:

- Organizational viability and long-term sustainability
- Compliance with tax and regulatory obligations
- Protection of student financial interests
- Transparency and accountability to stakeholders
- Capacity to invest in quality and improvement
- This section establishes ELI Schools' framework for key financial management areas that directly impact regulatory compliance, student protection, and operational integrity.

Scope and Context

While ELI Schools maintains comprehensive financial management systems covering all aspects of organizational finance (budgeting, management accounts, payroll, procurement, etc.), this section focuses specifically on three areas with direct relevance to quality assurance and regulatory compliance:

- | | |
|---|---|
| Tax Compliance: | <ul style="list-style-type: none">• Ensuring ELI Schools remains fully compliant with all Irish tax obligations• Maintaining tax clearance certification required for regulatory authorization• Demonstrating financial probity to regulatory bodies, students, and partners |
| End of Course Examination Fees: | <ul style="list-style-type: none">• Managing financial obligations to external examination bodies• Maintaining accurate records of examination fees collected and paid• Ensuring accountability and transparency in examination fee handling• Compliance with immigration reporting requirements |
| Protection of Enrolled Learners and Medical Insurance: | <ul style="list-style-type: none">• Ensuring timely payment of Protection of Enrolled Learners (PEL) insurance premiums• Ensuring medical insurance coverage for all non-EEA visa students as required by immigration regulations• Protecting student welfare and meeting regulatory obligations |

16.1 Policy on Tax Compliance

QA Area(s)	• Governance and Management of Quality • Financial Management		
Applies to	<input checked="" type="checkbox"/> Staff only	<input type="checkbox"/> Learners only	<input type="checkbox"/> Staff and learners
Policy Owner	Finance Manager		

Purpose

This policy establishes ELI Schools' commitment to full compliance with all Irish tax obligations and maintaining current tax clearance certification as required for regulatory authorization and operational integrity.

Scope

This policy applies to all tax obligations of ELI Schools as a registered company operating in Ireland, including:

- Corporation Tax
- Pay As You Earn (PAYE) and employee taxes
- Employer's PRSI (Pay Related Social Insurance)
- Universal Social Charge (USC)
- Professional Services Withholding Tax (PSWT) where applicable
- Local Property Tax (LPT) where applicable
- Any other applicable taxes

Note: English language education services are VAT-exempt in Ireland. ELI Schools does not charge VAT on tuition fees and is not required to register for or file VAT returns. This policy does not address VAT as it is not applicable to ELI Schools' educational services.

Policy Statement

Commitment to Tax Compliance:

ELI Schools is committed to full compliance with all Irish tax laws and regulations. We recognize that tax compliance is:

- A legal obligation
- A regulatory requirement for authorization to operate
- A demonstration of financial probity and organizational integrity
- Essential for maintaining stakeholder trust
- Fundamental to responsible business practice

Zero Tolerance for Non-Compliance:

ELI Schools operates a zero-tolerance policy toward tax non-compliance. Any tax obligations will be:

- Met fully and on time
- Accurately calculated and reported
- Properly documented and recorded
- Subject to professional oversight

Tax Obligations:

ELI Schools ensures timely compliance with all tax obligations including:

- Corporation Tax:**
 - Annual corporation tax return filed by deadline
 - Tax liability calculated accurately
 - Payment made promptly
 - Professional tax advisor engaged as needed
- PAYE (Pay as You Earn) and Employee Taxes:**
 - PAYE deducted correctly from employee salaries
 - Employee PRSI and USC (Universal Social Charge) calculated and deducted
 - Employer's PRSI paid
 - Monthly returns filed on time
 - Annual returns (P35, P60s) completed accurately and on time
- Record Keeping:**
 - Comprehensive financial records are maintained to support tax compliance:
 - All financial transactions recorded accurately
 - Supporting documentation retained (invoices, receipts, payroll records)
 - Records retained for required period (typically 6 years minimum)
 - Records organized and accessible for audit or inspection
 - Electronic and paper records secured appropriately
- Professional Support:** ELI Schools engages professional support to ensure tax compliance:
 - Qualified accountant prepares annual accounts
 - Tax advisor provides guidance on complex tax matters
 - Payroll service provider or qualified staff manage PAYE compliance
 - Professional advice sought proactively when needed
 - Annual audit or independent review of financial records (as appropriate to company size)
- Monitoring and Reporting:**
 - Internal Monitoring:**
 - Finance Manager monitors all tax deadlines (calendar reminders set)
 - Monthly review of tax compliance status
 - Quarterly report to Managing Director confirming compliance
 - Annual report to Board of Directors on tax status

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Approved by	Board of Directors, Academic Committee
Next Review Date	March 2027

Related legislation, regulation or guidelines:

- Taxes Consolidation Act 1997 (as amended)
- Finance Acts (various years)
- Revenue Commissioners regulations and guidelines
- Companies Act 2014
- Code of Practice for Provision of Programmes of English Language Education to International Learners

16.2 Policy on Payment of End of Course Examination Fees

QA Area(s)	• Financial Management • Academic Compliance • Assessment of Learners		
Applies to	<input checked="" type="checkbox"/> Staff only	<input checked="" type="checkbox"/> Learners only	<input checked="" type="checkbox"/> Staff and learners
Policy Owner	Finance Manager and Academic Manager		

Purpose

This policy establishes ELI Schools' framework for managing end-of-course examination fees with accuracy, transparency, and accountability, ensuring proper collection from students, timely payment to examination bodies, and comprehensive record-keeping.

Scope

This policy applies to all external end-of-course examinations that ELI Schools registers students for, including:

- Cambridge English examinations (e.g., B2 First, C1 Advanced, C2 Proficiency)
- IELTS examinations (Academic and General Training)
- TIE (Test of Interactive English)
- Any other externally authenticated examinations used for end-of-course assessment
- This policy applies to all non-EEA visa students enrolled on Academic Year programmes who are required to complete external examinations for immigration compliance purposes.

Policy Statement

Fiduciary Responsibility:

ELI Schools acts as intermediary in collecting examination fees from students and paying these fees to external examination bodies. This creates a fiduciary responsibility to:

- Collect examination fees appropriately from students
- Hold fees securely until payment to examination bodies
- Pay examination bodies accurately and on time
- Account for all examination fees collected and paid
- Maintain transparency and provide evidence of proper handling
- Ensure no misuse or misappropriation of student funds

Student Protection:

Students paying examination fees to ELI Schools trust that:

- Fees will be used for the stated purpose (examination registration)
- Fees will be paid to examination bodies on their behalf
- They will be registered for examinations as agreed
- Proper records will be maintained
- Any refunds due will be processed
- ELI Schools honours this trust through robust financial management and accurate record-keeping.

Regulatory and Immigration Compliance:

Proper management of examination fees is important for:

- **Immigration Compliance:** INIS requires evidence that visa students are registered for and complete end-of-course examinations
- **Quality Assurance:** Regulatory bodies expect transparent financial handling

- **Institutional Integrity:** Proper financial management demonstrates organizational probity
- **Student Confidence:** Accurate systems build trust with students and families

Examination Fee Collection:

- Transparency:** Examination fees are clearly itemized separately from tuition fees in:
- Student invoices
 - Offer letters
 - Terms and conditions
 - Fee schedules
- Collection:** Examination Registration Fee of minimum €150 (or specific amount depending on examination) charged to all students requiring external examinations
- Fee collected with tuition fees before programme commencement
 - Fee amount reflects actual cost to ELI Schools of examination registration
- Clarity:** Students understand what examination fee covers:
- Registration with examination body
 - Examination administration
 - Examination certificate/results
 - Students understand examination fee is non-refundable once examination registered (in accordance with examination body policies)

Payment to Examination Bodies:

- Timely Payment:** ELI Schools pays examination bodies:
- Within timeframes required by examination body
 - Typically, upon registration or shortly thereafter
 - Before examination date
 - No delays in payment that could jeopardize student examination registration
- Accurate Payment:**
- Payment amount matches number of students registered
 - Payment calculated correctly based on examination body fee schedules
 - All registered students included in payment
- Documentation:**
- Invoices from examination bodies retained
 - Proof of payment retained
 - Reconciliation conducted to verify all students paid for

Comprehensive Record-Keeping:

ELI Schools maintains detailed records of all examination fee transactions:

- Student Records:**
- Examination fee collected from each student (amount and date)
 - Examination registered for (type, level, date)
 - Student name, ID, and programme details
 - Payment receipt provided to student
- Examination Body Records:**
- Students registered with examination body (list with names, dates)
 - Examination body invoices
 - Payments made to examination body (amount, date, method)
 - Payment confirmation from examination body
 - Correspondence with examination body
- Financial Records:**
- Examination fees received (income)

- Examination fees paid out (expense)
- Reconciliation showing fees collected = fees paid (or variance explained)
- Audit trail from student payment through to examination body payment

Immigration Reporting:

Examination registration and payment records used for immigration compliance reporting:

- Weekly reports to INIS include examination information (as per Section 14.10)
- Evidence of examination registration and payment available for inspection
- Academic Manager coordinates with Finance Manager to ensure data accuracy

Transparency and Audit:

Examination fee records available for:

- Internal audit
- External regulatory inspections (QQI, INIS)
- Examination body audits
- Student or parent inquiries

Records demonstrate:

- Proper collection and handling of fees
- Timely payment to examination bodies
- Accurate reconciliation
- Accountability and integrity

Separation of Duties:

To prevent misappropriation and ensure accuracy:

- Academic Manager responsible for registering students for examinations
- Finance Manager responsible for collecting fees and making payments to examination bodies
- Both coordinate to ensure alignment
- Both maintain independent records that are reconciled
- Managing Director provides oversight

Student Inquiries:

Students can inquire about their examination fee:

- Payment status (whether fee received by ELI Schools)
- Registration status (whether registered with examination body)
- Examination details (date, location, etc.)

Academic Manager or Finance Manager responds to inquiries with:

- Confirmation of payment received
- Confirmation of registration
- Examination details
- Copy of receipt if requested

Refund Policy:

Examination fees generally non-refundable once student registered:

- Consistent with examination body policies (examination bodies typically do not refund fees)

- Clearly communicated to students in advance
- Exception: If student withdraws before registration processed, refund may be provided

If refund due:

- Finance Manager processes refund
- Deducts any administration fees as per policy
- Refund timeline: typically, within 10-15 working days
- Refund method: original payment method where possible

Continuous Improvement:

Finance Manager and Academic Manager regularly review examination fee management:

- Are processes efficient and accurate?
- Are records comprehensive and well-organized?
- Are students satisfied with transparency and communication?
- Are there any issues or complaints?
- Improvements implemented as needed

Responsibility

Finance Manager:

- Collecting examination fees from students
- Recording examination fee payments in accounting system
- Paying examination bodies on time
- Maintaining financial records of all examination fee transactions
- Reconciling fees collected with fees paid
- Providing examination fee financial data for immigration reporting
- Responding to student inquiries about payment status
- Processing any refunds due
- Annual review of examination fee management

Academic Manager:

- Registering students for appropriate examinations
- Maintaining list of all students registered for examinations
- Communicating with examination bodies regarding registration
- Coordinating examination dates and logistics
- Providing registration data for immigration reporting
- Responding to student inquiries about examination registration
- Coordinating with Finance Manager to ensure alignment between registrations and payments

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Related legislation, regulation or guidelines:

- Code of Practice for Provision of Programmes of English Language Education to International Learners
- Immigration reporting requirements (INIS)
- Accounting standards and good practice

16.3 Procedure for Payment of End of Course Examination Fees

QA Area(s)	• Financial Management • Academic Compliance
Applies to	<input checked="" type="checkbox"/> Staff only <input checked="" type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
Policy Owner	Policy on Payment of End of Course Examination Fees

Purpose

This procedure outlines the operational steps for collecting examination fees from students, maintaining accurate records, paying examination bodies, and reconciling all transactions.

Procedure

Fee Collection from Students	<p>Including Examination Fee in Student Invoice (At Enrolment): When student enrolls on Academic Year programme:</p> <p>Admissions Staff: Prepare student invoice including:</p> <ul style="list-style-type: none"> • Programme name and duration • Tuition fee • Registration fee • Examination Registration Fee: €150 (or specific amount) • Total amount due
Student Pays Fees:	<ul style="list-style-type: none"> • Student pays total amount (including examination fee) according to payment instructions: • Via escrow (if visa student) • Via bank transfer directly to ELI Schools (if not visa student)
Finance Manager Records Payment:	<p>When payment received: Finance Manager:</p> <ul style="list-style-type: none"> • Records payment in accounting system <p>Allocates payment to categories:</p> <ul style="list-style-type: none"> • €5,000 → Tuition Income • €150 → Registration Fee Income • €150 → Examination Fee Income (or "Examination Fees Received") • Updates student account status: "Paid in Full" • Issues receipt to student
Student Placement and Examination Selection	<ul style="list-style-type: none"> • Student completes placement test and is assigned entry level • Academic Manager advises on appropriate exit examination • Student signs Examination Agreement confirming examination selection • 8 weeks before examination: Progress review and confirmation/adjustment of examination level
Academic Manager Updates Records:	<p>When examination confirmed for student: Academic Manager:</p>

Student ID	Student Name	Entry Level	Target Exit Level	Examination Selected	Exam Date	Registration Status
2024001	[Name]	B1	B2	Cambridge B2 First	15/02/2025	To be registered

Examination Registration with Examination Body

Bulk Registration Process: Academic Manager registers students for examinations in bulk (typically 8-12 weeks before examination date):

Step 1: Compile Registration List

Academic Manager:

- Compiles list of all students to be registered for upcoming examination session
- Organized by examination type and level
- Includes all required student information:
 - Full name (as on passport)
 - Date of birth
 - Nationality
 - Contact details
 - Any special requirements

Step 2: Submit Registration to Examination Body

Academic Manager:

- Submits registration through examination body's system (online portal or form submission)

For each examination body (Cambridge, IELTS, TIE):

- Logs into examination body portal
- Completes bulk registration form
- Uploads student list
- Confirms examination date and location
- Submits registration

Step 3: Receive Registration Confirmation and Invoice

Examination Body:

- Confirms registration received
- Provides list of registered students
- Issues invoice for examination fees

Invoice example (from Cambridge):

- Cambridge Assessment English
- Invoice to: ELI Schools
- Date: 20 November 2024
- B2 First Examination - Session February 2025
- Examination Date: 15 February 2025
- Number of Candidates: 25
- Fee per candidate: €145
- Total: €3,625.00

**Academic Manager
Actions Upon Receiving
Invoice:**

Verify invoice accuracy:

- Number of candidates matches registration list
- Student names on invoice match registration list
- Fee per candidate is correct
- Total calculated correctly

Forward invoice to Finance Manager for payment:

- Email invoice (PDF)
- Attach list of students registered (Excel)
- Note payment deadline
- Request payment confirmation when processed

Payment to Examination Body

Finance Manager Receives Invoice:

Finance Manager:

- Receives invoice from Academic Manager

Reviews invoice:

- Number of candidates
- Amount per candidate
- Total amount
- Payment deadline

Finance Manager Verifies Against Examination Fees Collected:

Finance Manager checks Examination Fees Register:

- How many students paid examination fees? [e.g., 25]
- How much collected in fees for these students? [e.g., 25 x €150 = €3,750]
- How much is examination body invoice? [e.g., €3,625]

Finance Manager Processes Payment:

a) Prepare payment:

- Payment method: Bank transfer (typically)
- Beneficiary: Examination body bank details (from invoice)
- Amount: Exact invoice amount
- Reference: Invoice number and "ELI Schools February 2025 B2 First candidates"

b) Obtain payment authorization:

- Payments over certain threshold (e.g., €1,000): Managing Director approves
- Approval documented (email or signature on invoice)

c) Process payment through online banking or bank visit:

- Complete bank transfer
- Obtain payment confirmation/receipt
- Payment made by deadline on invoice

d) Inform examination body of payment:

- Email examination body: "Payment of €3,625 for Invoice #[X] processed on [date] via bank transfer"
- Attach payment confirmation if requested

Finance Manager Records Payment:

Record in accounting system:

- Date: Payment date
- Category: Examination Fees Expense (or "Examination Fees Paid Out")
- Amount: €3,625
- Payee: Cambridge Assessment English
- Description: "B2 First examination fees for 25 candidates, February 2025 session"
- Attach scanned invoice and payment receipt

Finance Manager and Academic Manager jointly verify:

- List of students registered (Academic Manager's list)
- List of students paid examination fees (Finance Manager's register)
- Invoice from examination body (number of students and names)
- Payment made to examination body

Checklist:

- All students on Academic Manager's registration list appear on examination body invoice
- All students on Academic Manager's registration list have paid examination fees (per Finance register)
- Number of students registered = number of students invoiced by exam body
- Payment made to exam body matches invoice amount
- Payment made by deadline
- All students on examination body's confirmed registration list

If discrepancies found:

- Student registered but hasn't paid fee: Follow up with student for payment
- Student paid fee but not registered: Academic Manager registers student immediately
- Examination body invoice doesn't match registration: Contact exam body to resolve

Sign-off: Both Finance Manager and Academic Manager sign reconciliation confirming alignment.

- Filed in both Academic and Finance examination records.

Physical and Digital Files:**Digital Files:**

- Secure folder on server
- Same organizational structure as physical files
- Scanned copies of all documents
- Excel registers
- Email correspondence
- **Retention:** Minimum 7 years (may be retained permanently for audit trail)

6.3. Student Individual Files:

Finance Manager or Admissions staff ensure each student file contains:

- Receipt showing examination fee paid
- Copy of examination agreement (Academic Manager provides)
- Examination details (type, date, location)
- Academic Manager ensures academic file contains:
 - Examination agreement
 - Registration confirmation
 - Examination result (when received)

Audit and Inspection Readiness

Regulatory Inspections:

When inspectors (QQI, INIS) request examination fee records:

Finance Manager provides:

- Examination Fees Register showing all students and fee transactions
- Sample invoices from examination bodies
- Sample payment receipts
- Reconciliation documents
- Demonstrates proper handling and accountability

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Related legislation, regulation or guidelines:

- Code of Practice for Provision of Programmes of English Language Education to International Learners
- Immigration reporting requirements (INIS)
- Accounting standards

16.4 Policy on Payment of Protection of Enrolled Learners and Medical Insurance

QA Area(s)	• Financial Management • Learner Protection • Governance and Management of Quality		
Applies to	<input checked="" type="checkbox"/> Staff only	<input checked="" type="checkbox"/> Learners only	<input checked="" type="checkbox"/> Staff and learners
Policy Owner	Finance Manager		

Purpose

This policy establishes ELI Schools' commitment to ensuring timely payment of Protection of Enrolled Learners (PEL) insurance premiums and medical insurance coverage for all non-EEA visa students, protecting student welfare and meeting regulatory obligations.

Scope

This policy applies to:

Protection of Enrolled Learners (PEL) Insurance:

- All enrolled students at ELI Schools (EEA and non-EEA)
- All programme types and durations
- All locations

Medical Insurance:

- All non-EEA visa students enrolled on programmes requiring student immigration permission
- Academic Year English students and other ILEP-listed programmes
- Students enrolled for 25 weeks or more

Policy Statement

Dual Insurance Requirement:

ELI Schools maintains two distinct insurance protections for students:

1. Protection of Enrolled Learners (PEL) Insurance

- **Purpose:** Protects student tuition fees if ELI Schools is unable to deliver programmes (e.g., insolvency, closure, loss of authorization)
- **Coverage:** All enrolled students
- **Requirement:** Mandatory under Code of Practice

2. Medical Insurance

- **Purpose:** Provides medical and hospital expense coverage for students during their stay in Ireland
- **Coverage:** All non-EEA visa students
- **Requirement:** Mandatory under Irish immigration regulations
- **Benefit:** Protects students from high medical costs and ensures access to healthcare
- **Critical Importance of Timely Premium Payment:**
- Both insurance policies are only effective if premiums are paid on time. Lapsed insurance creates serious risks:

Part A: Protection of Enrolled Learners (PEL) Insurance

- Premium Payment Obligation:** ELI Schools pays PEL insurance premiums:
- **In advance** (before policy period commences)
 - **On time** (by due date, no delays)
 - **In full** (complete premium amount)
- Premium Calculation:** PEL insurance premium typically calculated based on:
- Total student enrolment numbers, OR
 - Total fee income, OR
 - Flat fee
 - Insurer calculates premium based on ELI Schools' provided data.
- Budget Allocation:** Finance Manager ensures PEL premium:
- Included in annual budget
 - Adequate funds allocated
 - Premium payment prioritized in cash flow
 - Not subject to delay due to cash flow issues

Part B: Medical Insurance for Non-EEA Visa Students

- ELI Schools' Responsibility:** ELI Schools ensures all non-EEA visa students have medical insurance through one of two methods:
- **Method 1: ELI Schools Arranges Group Policy (Preferred Method)**
 - ELI Schools negotiates group medical insurance policy with insurance provider
 - Policy covers all non-EEA visa students enrolled
 - ELI Schools pays premiums on behalf of students
 - Cost passed to students (included in fees or charged separately)
 - Advantages: Guaranteed coverage, group rates, administrative efficiency
 -
 - **Method 2: Students Arrange Individual Policies**
 - Students obtain own private medical insurance before arrival
 - Students provide evidence of coverage to ELI Schools
 - ELI Schools verifies coverage meets INIS requirements
 - Students responsible for premium payments
 - Disadvantage: More administrative burden, risk students don't obtain adequate coverage

Verification of Coverage:

Finance Manager and Admissions Manager coordinate to ensure:

- All non-EEA visa students on medical insurance register
- All students have certificates of insurance
- Coverage dates match programme dates
- No students without coverage

If Student Withdraws or Completes Early:

- Notify insurance provider of early departure
- Pro-rata refund may be due from insurer (depends on policy terms)
- Refund credited to ELI Schools or passed to student (per refund policy)

Record Keeping:

Finance Manager maintains comprehensive records:

PEL Insurance File:

- Policy documents
- Certificates of Currency
- Premium payment receipts
- Correspondence with insurer
- Renewal records

Medical Insurance File:

- Group policy document (if Method 1)
- Student-by-student register of coverage
- Premium payment receipts
- Certificates of Insurance for each student
- Correspondence with insurer
- Evidence of student payments (fees collected)

Retention: Minimum 7 years

Regulatory Inspections:

Insurance records available for inspection by:

- QQI (PEL insurance)
- ACELS (PEL insurance)
- INIS (medical insurance)
- Finance Manager ensures records audit-ready at all times.
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Related legislation, regulation or guidelines:

- Code of Practice for Provision of Programmes of English Language Education to International Learners
- Irish immigration regulations requiring medical insurance for visa students
- Immigration Act 2004 (as amended)
- INIS requirements for student visa holders

16.5 Procedure for Payment of Protection of Enrolled Learners and Medical Insurance

QA Area(s)	• Financial Management • Learner Protection
Applies to	<input checked="" type="checkbox"/> Staff only <input checked="" type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
Policy Owner	Policy on Payment of Protection of Enrolled Learners and Medical Insurance

Purpose

This procedure outlines the operational steps for ensuring timely payment of PEL insurance premiums and medical insurance premiums, maintaining continuous coverage, and managing all related records.

Procedure

PART A: PROTECTION OF ENROLLED LEARNERS (PEL) INSURANCE

ANNUAL CYCLE: PEL Insurance Renewal and Premium Payment

(Note: This procedure complements Section 16.4 Procedure for Protection of Enrolled Learners, focusing specifically on the financial/payment aspects)

1. Annual Budget Planning for PEL Premium

1.1. Budget Planning (3-4 months before financial year):

Finance Manager:

- Reviews previous year's PEL insurance premium paid
- Estimates enrolment growth or changes for coming year
- Estimates likely premium increase (typically 0-10% increase year-on-year)
- Allocates budget line item: "PEL Insurance Premium: €[Estimated amount]"
- Includes in draft annual budget
- Managing Director and Board approve budget including PEL premium allocation

2. PEL Insurance Renewal Process

Renewal Reminder (3 months before policy expiry):

Finance Manager receives calendar reminder:

- PEL insurance expires in 3 months
- Check renewal status
- Coordinate with provider

Prepare Enrolment Data for Renewal Quote (2-3 months before expiry):

Finance Manager compiles:

- Total students enrolled in past 12 months
- Current enrolment numbers
- Projected enrolment for next 12 months
- Total fee income (past year and projected)
- Any operational changes (new locations, new programmes, etc.)

PEL Premium Payment

Schedule Payment (4-6 weeks before due date):

Finance Manager:

- Notes premium payment due date in calendar
- Ensures funds available in bank account
- If funds tight: Prioritizes PEL premium payment (defer other payments if necessary)
- Prepares payment authorization

Process Payment (1-2 weeks before due date):

Critical: Payment must be made BEFORE policy expiry date. Ideally 1-2 weeks before to allow processing time.

Finance Manager:

a) Prepare payment:

- Amount: Full premium (e.g., €8,500)
- Payee: PEL insurance provider
- Method: Bank transfer (typically)
- Reference: "ELI Schools PEL Insurance Renewal 2024-2025"

b) Obtain authorization:

- Managing Director approves payment
- Approval documented (email or signature)

c) Process payment:

- Execute bank transfer through online banking
- Obtain payment confirmation
- Payment processes typically within 1-3 business days

d) Confirm receipt with insurer:

- Email insurer: "PEL insurance premium of €8,500 paid on [date] via bank transfer"
- Attach payment confirmation
- Request confirmation of receipt and policy activation

5. Monthly PEL Insurance Monitoring

5.1. Monthly Checklist (Finance Manager):

As part of monthly compliance check (see Section 17.2), Finance Manager verifies:

PEL Insurance Status:

- Current policy in place: Yes
- Policy expiry date: [Date]
- Months until expiry: [X]
- Action needed: None (if >4 months to expiry) Start renewal process (if <4 months)
- Premium paid and up to date: Yes
- Certificate of Currency current and available: Yes
- If any box cannot be ticked YES: Immediate action required.

Part B: Medical Insurance for Non-EEA Visa Students

METHOD 1: GROUP POLICY ARRANGED BY ELI SCHOOLS

Negotiating Group Policy (Before Academic Year Start or Annual Renewal):

Finance Manager:

- Contacts medical insurance providers specializing in student coverage
- Requests quotes for group policy covering:
 - All non-EEA visa students
 - Duration: Academic year (September-August) or rolling coverage
 - Coverage: Minimum €25,000 medical and hospital expenses (or INIS requirement)
 - Geographic area: Republic of Ireland
- Receives quotes from 2-3 providers

Student Pays Fees: Student pays total amount including medical insurance fee.

Finance Manager Records When payment received:

Payment:

- Records payment in accounting system
- Allocates: €85 → Medical Insurance Income
- This revenue will be used to pay premiums to insurance provider

Monthly Bulk Registration and Payment

Finance Manager:

Compiles list of all non-EEA visa students who enrolled this month:

Student ID	Student Name	DOB	Nationality	Programme Start	Programme End	Insurance Fee Paid
2024101	[Name]	01/01/2000	Brazil	01/09/2024	28/02/2025	Yes - €85
2024102	[Name]	15/03/1999	China	01/09/2024	28/02/2025	Yes - €85

Sends list to Finance Manager and insurance provider

Finance Manager:

- Verifies all students on list have paid medical insurance fee
- Calculates total premium due: [X students] x €85 = €[Total]
- Pays bulk premium to insurance provider

Insurance provider:

- Issues Certificates of Insurance for all students on list
- Emails certificates to ELI Schools

Receipt and Distribution of Certificates:

Admissions Manager or Student Services Officer:

- Receives Certificates of Insurance from insurer
- Prints certificates or prepares electronic copies
- Gives certificate to each student at induction: "This is your medical insurance certificate. Keep it safe. If you need medical treatment, show this certificate at the hospital or GP. The insurance company contact number for claims is [number]."
- Files copy in each student's file
- Updates medical insurance register

9. Medical Insurance Register

Finance Manager maintains Medical Insurance Register (Excel spreadsheet):

Register tracks every non-EEA visa student from fee collection through to insurance provider payment.

Paying Insurance Provider

Process Premium Payment: (Monthly Bulk):

Payment made monthly for all students enrolled that month

Part D: Monitoring And Reporting

Monthly Monitoring

Monthly Insurance Compliance Check (Finance Manager):

PEL Insurance:

- Status: Current (Expiry: [Date])
- Premium paid: Yes (Last payment: [Date], Amount: €[X])
- Certificate available: Yes
- Action needed: None / Start renewal process

Medical Insurance:

- Number of non-EEA visa students enrolled: [X]
- All covered by medical insurance: Yes / No ([X] outstanding)
- Fees collected from students: €[Total]
- Premiums paid to insurer: €[Total]
- Variance: €[Amount] (Explanation: [If any])
- All certificates issued: Yes / No ([X] pending)
- Any issues identified: Resolved immediately.

Quarterly Reporting

Finance Manager prepares:

Insurance Compliance Report - Q[X] 202[X]

Protection of Enrolled Learners Insurance:

- Status: Current and active
- Policy Period: [Dates]
- Expiry: [Date]
- Premium: €[X] (Paid: [Date])

- Next renewal: [Date and planned action]

Medical Insurance (Non-EEA Visa Students):

- Students covered this quarter: [X]
- Total insurance fees collected: €[X]
- Total premiums paid to insurer: €[X]
- All students issued certificates: Yes
- Compliance: Full compliance with immigration requirements

Issues or Concerns:

- [None / Description]
- **Overall Status:** Both PEL and medical insurance fully compliant.
- Prepared by: [Finance Manager], Date: [Date]

Annual Reporting

Annual Report to Board of Directors:

Finance Manager prepares comprehensive report:

Insurance Compliance Annual Report - 202[X]

1. Protection of Enrolled Learners Insurance:

- Continuous coverage maintained: Yes (No lapses)
- Annual premium: €[X]
- Policy provider: [Name]
- Coverage: All enrolled students
- Claims made: [None / Number and brief description]
- Renewal completed: [Date]

2. Medical Insurance (Non-EEA Visa Students):

- Total non-EEA visa students enrolled during year: [X]
- All provided with medical insurance: Yes
- Total insurance fees collected from students: €[X]
- Total premiums paid to insurer: €[Y]
- Variance: €[X-Y] (Explained by: [Timing differences / etc.])
- Policy provider: [Name]
- Coverage level: €[Amount] per student
- Claims by students: [Number - Finance Manager may not have details but notes if aware of claims]

Version	1.0
Date Approved	March 2026
Approved by	Board of Directors

Related legislation, regulation or guidelines:

- Code of Practice for Provision of Programmes of English Language Education to International Learners
- Irish immigration regulations
- Immigration Act 2004 (as amended)
- INIS requirements for student visa holders

16.6 Policy on Protection of Student Fees for Visa Required Students through Escrow Services

QA Area(s)	• Learner Protection • Financial Management • Learner Recruitment and Admission		
Applies to	<input type="checkbox"/> Staff only	<input checked="" type="checkbox"/> Learners only	<input checked="" type="checkbox"/> Staff and learners
Policy Owner	Finance Manager and Admissions Manager		

Purpose

This policy establishes ELI Schools' commitment to protecting student fees paid by visa-required students through secure escrow services, ensuring fees are held safely until visa approval is confirmed and the student commences their programme, with full refund available if visa is refused.

Scope

This policy applies to all non-EEA students who require visa approval to study in Ireland, specifically:

- Students from countries requiring student visa (D Study Visa) to enter Ireland
- Students applying for student immigration permission for programmes on the Interim List of Eligible Programmes (ILEP)
- Academic Year English students and other long-term programme students requiring visa

This policy does NOT apply to:

- EEA nationals (no visa required)
- Students from visa-exempt countries
- Students already in Ireland with valid immigration permission

Policy Statement

Commitment to Protecting Visa Student Fees:

ELI Schools recognizes that non-EEA students applying for student visas face unique financial risks:

- They must pay programme fees before visa application (often required for visa)
- Visa applications may take weeks or months
- Visas may be refused through no fault of student
- If visa refused after fees paid, student cannot attend and needs refund
- Refund processes may be slow or disputed
- Students may have limited financial resources and cannot afford to lose fees
- These risks are particularly concerning for students from developing countries or those making substantial financial commitments to study abroad.

Escrow Services as Student Protection:

- To protect visa-required students, ELI Schools uses **escrow services** for fee payments.

What is Escrow?

Escrow is a financial arrangement where fees paid by students are held by an independent third party (the escrow agent) rather than going directly to ELI Schools. The fees are only released to ELI Schools when agreed conditions are met (visa approved, student commenced programme). If conditions are not met (visa refused), fees are returned to the student.

Escrow Service Provider:

ELI Schools partners with reputable escrow service provider: Revolut Bank Account and/or Transfermate

How Escrow Works - Process Overview:

Step 1: Offer and Escrow Instructions

- ELI Schools issues offer letter to student
- Offer letter includes escrow payment instructions
- Student must pay fees to escrow account (not directly to ELI Schools)

Step 2: Student Pays Fees to Escrow

- Student makes payment to escrow agent
- Fees held securely in escrow account
- Payment confirmation sent to student and ELI Schools

Step 3: Visa Application

- Student applies for visa using offer letter and payment confirmation
- ELI Schools supports visa application as needed
- Fees remain in escrow during visa processing

Step 4: Visa Decision

If Visa Approved:

- Student provides evidence of visa approval to escrow agent and ELI Schools
- Student confirms travel plans and arrival date
- Escrow agent releases fees to ELI Schools upon student arrival OR on programme start date
- Student commences programme

If Visa Refused:

- Student provides evidence of visa refusal to escrow agent
- Escrow agent processes refund to student
- Refund returned to student (minus escrow fee, as per terms)
- Student does not lose fees paid
-

Step 5: Programme Commencement

- Student arrives in Ireland and commences programme
- Escrow releases fees to ELI Schools
- Fee transfer typically occurs within days of programme start
- Transaction complete

Version	1.0
Date Approved	March 2026
Approved by	Board of Directors
Next Review Date	March 2027

Related legislation, regulation or guidelines:

- Code of Practice for Provision of Programmes of English Language Education to International Learners

16.7 Procedure for Protection of Student Fees for Visa Required Students through Escrow Services

QA Area(s)	• Learner Protection • Financial Management • Learner Recruitment and Admission
Applies to	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
Policy Owner	Policy on Protection of Student Fees for Visa Required Students through Escrow Services

Purpose

This procedure outlines the operational steps for managing student fee payments through escrow services, from initial setup through to fee release or refund.

Procedure

Issuing Offers with Escrow Payment Instructions

Determining if Student Requires Escrow

When processing application from non-EEA student:

Admissions Staff Check:

- Student's nationality and passport held
- Student's current location
- Whether student requires visa to enter Ireland
- Whether student already in Ireland with valid immigration permission

Decision Tree:

If student is:

- EEA national → Escrow NOT required (standard payment process)
- From visa-exempt country (e.g., Brazil, Mexico) → Escrow NOT required
- Already in Ireland with valid immigration permission → Escrow NOT required
- Non-EEA national requiring visa → **Escrow REQUIRED**

Flag student record in system: "Escrow Required: Yes/No"

Generating Offer Letter with Escrow Instructions

For students requiring escrow, Admissions staff:

Step 1: Generate Unique Reference

- Contact escrow provider OR use automated system to generate unique payment reference for this student
- Reference number format typically: [ELI][StudentID][Year] or similar
- Example: ELI00123452024

Step 2: Prepare Offer Letter

- Use offer letter template for escrow students (separate template from direct payment):

Key sections in offer letter:

Programme and Fees Section:

- Programme: Academic Year English - General English
- Duration: 25 weeks
- Start Date: [Date]
- End Date: [Date]

- Tuition Fee: €5,000
- Registration Fee: €150
- Examination Fee: €150
- Total Programme Fee: €5,300

Accommodation (optional): [Details and costs if applicable]

Important:

- You must include your unique reference number (ELI00123452024) with your payment
- Payment must be received by [Date - typically 4 weeks before programme start or before visa application]
- Do NOT send payment directly to ELI Schools - payment must go to escrow account
- The escrow service fee of €[X] is non-refundable if your visa is refused
- AFTER PAYMENT:
- [Escrow Provider] will send you payment confirmation
- Use this confirmation in your visa application
- If visa approved, fees will be released to ELI Schools when you start your programme
- If visa refused, fees will be refunded to you by [Escrow Provider]

Terms and Conditions Attachment:

Includes clause: "Visa Required Students - Escrow Payment: Students requiring visa approval must pay fees through ELI Schools' escrow partner as specified in your offer letter. Fees held in escrow are subject to the escrow agent's terms and conditions. Fees will be released to ELI Schools when you commence your programme. If your visa application is refused, you must notify the escrow agent and provide evidence of refusal. The escrow agent will process your refund in accordance with their terms, typically within 28 working days. Escrow service fees are non-refundable."

Step 3: Issue Offer Letter

Admissions staff:

- Email offer letter to student
- Include escrow provider's terms and conditions (link or attachment)
- Include ELI Schools terms and conditions
- Record in CRM: "Offer issued with escrow payment instructions, Reference: ELI00123452024"

Following Up with Student

After issuing offer, Admissions staff:

Within 3-5 days:

Follow up with student to confirm:

- Offer letter received
- Payment instructions clear
- Student understands escrow process

Student has any questions

Answer Common Questions:

- Q: "Why can't I pay directly to the school?" A: "For your protection, students requiring visa approval must use escrow. This ensures your fees are refunded if your visa is refused."
- Q: "Is escrow safe?" A: "Yes, [Provider Name] is a regulated financial services provider specializing in education payments. Your fees are held securely."
- Q: "What if my visa is refused?" A: "If your visa is refused, simply provide evidence to [Provider Name] and they will refund your fees to you, typically within 5-15 working days."
- Q: "Why is there an escrow fee?" A: "[Provider Name] charges a service fee for holding and managing your payment securely. This is standard practice."

Part C: Monitoring Escrow Payments

Tracking Student Payments to Escrow

Escrow provider notifies ELI Schools when payments received:

Notification Methods:

- Email notification for each payment received
- Daily or weekly payment report (Excel/CSV)
- Access to escrow provider portal showing all payments

Notification typically includes:

- Student reference number
- Student name (as provided by payer)
- Amount received
- Date received
- Payment method
- Currency

Admissions Staff Action Upon Payment Notification:

- a) Receive payment notification from escrow provider
- b) Match payment to student record using reference number
- c) Update student record in CRM/system:

- Payment status: "Fees received in escrow"
- Amount received: €[amount]
- Date received: [date]
- Payment reference: [escrow reference]

- d) Send confirmation email to student:

Dear [Student Name],

We have received confirmation from [Escrow Provider] that your payment of €[amount] has been received and is being held securely in escrow

Your payment reference: ELI00123452024

You can use the payment confirmation from [Escrow Provider] as evidence of payment in your visa application.

Once your visa is approved and you commence your programme, your fees will be released to ELI Schools.

If you have any questions, please contact us.

Best regards,

ELI Schools Admissions Team

- e) File payment confirmation in student's file

6. Reconciliation of Escrow Payments

Weekly Reconciliation (Finance Staff):

Every Monday, Admissions staff:

- Download payment report from escrow provider portal
- Compare with student records in CRM
- Verify all payments received have been recorded against correct students
- Investigate any discrepancies:
- Payments received but no matching student reference (contact escrow provider and/or student)
- Students showing as paid in CRM but no escrow payment record (verify documentation)

Monthly Reconciliation (Finance Manager):

End of each month, Finance Manager:

- Reconciles total payments in escrow (escrow provider balance) with ELI Schools records (sum of all students showing "fees in escrow")
- Verifies amounts match
- Investigates any discrepancies
- Documents reconciliation

Part D: Visa Application and Approval Process

7. Supporting Student Visa Applications

While fees in escrow and student applying for visa:

- | | |
|------------------------------------|---|
| Admissions Staff: | <ul style="list-style-type: none"> • Available to answer student questions about visa process • Provide additional documentation if requested by student for visa (e.g., confirmation of enrolment, programme details) • May provide letter to visa authorities (if requested) confirming fees secured in escrow |
| Tracking Visa Applications: | <ul style="list-style-type: none"> • Admissions staff maintain Visa Application Tracker for all escrow students: • Update tracker when student informs of visa application submitted • Follow up with students periodically for visa status updates • Prepare for programme start based on expected visa approvals |

8. Receiving Visa Approval or Refusal Notification

Student Notifies ELI Schools of Visa Decision:

If Visa Approved:

- Student emails: "My visa has been approved! I can travel to Ireland."
- Admissions staff:
 - Congratulate student
 - Request copy of visa/immigration permission for records
 - Confirm programme start date and arrival arrangements
 - Confirm student still intends to commence programme
 - Inform student: "Your fees will be released from escrow to ELI Schools when you commence your programme"
 - Update Visa Tracker: Status = "Visa Approved"
 - Prepare for student's arrival

If Visa Refused:

- Student emails: "My visa has been refused. I cannot come to Ireland. How do I get my refund?"
- Admissions staff:
 - Express sympathy for situation
 - Provide clear refund instructions:

You will need to provide:

- *Your payment reference: ELI00123452024*
- *Copy of your visa refusal letter/email*
- Update Visa Tracker: Status = "Visa Refused - Refund"
- Notify Finance Manager (for accounting and reconciliation)
- Close student enrolment process
- File documentation

Part E: Fee Release from Escrow to ELI Schools

Confirming Programme Commencement

When student arrives and commences programme:

Day 1 of Programme:

Academic staff:

- Student attends first day of class
- Student marked present on attendance register
- Student participates in induction

Admissions staff:

- Update student record: Status = "Programme Commenced"
- Record actual start date (may differ from planned date)

Admissions Staff Notify Escrow Provider of Commencement:

Within **24-48 hours** of programme commencement, Admissions staff:

Send notification to escrow provider (email or via portal):

- Student Reference: ELI00123452024
- Student Name: [Name]
- Programme: Academic Year English
- Start Date: 01/09/2024

This confirms the student has commenced their programme as scheduled.

Please release fees to ELI Schools as per agreement.

Supporting evidence: Attendance register showing student present on 01/09/2024 (attached).

Attach evidence if required by escrow agreement (e.g., copy of attendance register, photo of student at school if appropriate)

Record notification in student file: "Release notification sent to escrow provider [date]"

Escrow Provider Releases Fees to ELI Schools

Escrow provider processes fee release:

Escrow Provider Actions:

- Verifies release conditions met (visa approved, programme commenced)
- Processes transfer of fees from escrow account to ELI Schools' bank account
- Timeline: Typically, 3-5 working days after release notification
- Sends release confirmation to ELI Schools and student

Release Notification Includes:

- Student reference
- Amount released
- Date of transfer
- Expected arrival in ELI Schools account
- Confirmation invoice or receipt

Finance Manager Actions:

a) Receive release notification from escrow provider

b) Monitor ELI Schools bank account for receipt of funds

c) When funds arrive:

- Verify amount matches expected release
- Record in accounting system:
- Revenue recognized: Date fees received (not date student originally paid)
- Student account: Mark as "Fees received"
- Bank reconciliation: Match payment to student

d) Notify Admissions Manager: "Fees received for student [name], reference ELI00123452024"

e) File all documentation:

- Release notification from escrow provider
- Bank statement showing receipt

Part F: Managing Exceptions and Issues

11. Late Arrival or Deferral After Visa Approval

Scenario: Student's visa approved, but student requests to defer programme start or arrives late.

- Admissions staff:**
- Discuss with student reason for deferral/late arrival
 - If genuine reason (e.g., flight delays, medical issue): accommodate if possible

Coordination with Escrow:

- Fees remain in escrow until student actually commences (not released on original start date if student hasn't arrived)
- If deferral to future term: communicate new start date to escrow provider
- Release notification sent only when student actually starts

If Long Deferral (e.g., several months):

- Check escrow agreement terms for maximum hold period
- May need to request extension or special arrangement
- Communicate clearly with student about new timeline

Scenario: Student's visa approved but student withdraws before commencement.

Admissions staff:

Receive notification from student: "I've decided not to come. Can I get a refund?"

Assessment:

- Check refund policy in terms and conditions
- Typically: If student withdraws before programme starts, even with visa approved, refund may be due (minus cancellation fee as per policy)

Coordination with Escrow:

- Contact escrow provider: "Student has withdrawn before commencement. Please process refund according to ELI Schools refund policy."
- Provide evidence: Student withdrawal request, confirmation no attendance
- Escrow provider refunds to student (minus any cancellation fees and escrow fee)
- ELI Schools may need to pay cancellation fee to escrow provider or student depending on agreements

Disputes or Issues with Escrow

Scenario: Student claims they paid but escrow provider has no record.

Admissions staff:

Request evidence from student:

- Bank transfer receipt
- Payment reference used
- Date of payment
- Contact escrow provider with student's evidence

Investigate discrepancy:

- Did student use correct account details?
- Did student include correct reference number?
- Is payment pending or delayed in banking system?

Resolution:

- If payment found: Update records, proceed as normal
- If payment genuinely missing: Student may need to trace with their bank or resubmit payment
- Admissions staff facilitate communication between student and escrow provider