18. Risk, Change and Crisis Management

18. Risk, Change and Crisis Management

Introduction

Effective risk management, organizational change management, and crisis preparedness are fundamental to ELI Schools' resilience, sustainability, and duty of care to students, staff, and stakeholders. In an increasingly complex operating environment—characterized by regulatory changes, market dynamics, operational challenges, and potential emergencies—ELI Schools must systematically identify, assess, and manage risks while remaining adaptable and responsive to change. This section establishes ELI Schools' comprehensive framework for understanding and managing organizational risk, implementing planned change initiatives, and responding effectively to crises.

Risk management is not a separate function but is integrated throughout all aspects of ELI Schools' operations, governance, and decision-making. By identifying and understanding risks early, implementing appropriate mitigation strategies, and building organizational resilience, we protect our educational provision, our stakeholders, and our long-term sustainability. Similarly, planned change initiatives—whether programmatic, operational, or strategic—must be managed thoughtfully to ensure smooth transitions, minimize disruption, and achieve intended outcomes. Finally, comprehensive crisis management capabilities ensure that when emergencies occur, ELI Schools can respond swiftly, effectively, and with clear accountability.

Purpose and Scope

The purpose of this section is to:

- **Establish ELI Schools' commitment to systematic risk management**
- **Define risk appetite and tolerance**, enabling informed decision-making at all governance levels
- **Create a documented Risk Management Plan**
- **Ensure all risks are identified, assessed, monitored, and reviewed** on a regular basis
- **Establish a framework for managing organizational change**
- **Develop crisis and emergency preparedness**
- **Comply with statutory requirements** including health and safety legislation, employment law, data protection, child safeguarding, and regulatory expectations (QQI, EAQUALS)
- **Foster a risk-aware culture** where all staff understand their role in identifying and managing risks
- **Protect students, staff, visitors, and the organization** from foreseeable harms and business disruptions
- **Ensure business continuity** through planning and preparedness for various scenarios
- **Support strategic decision-making** through evidence-based understanding of organizational risks and opportunities

This section applies to:

- **All staff members** at all locations (Dublin, Drogheda, any other centres)
- **All students and learners** (risks related to their safety, wellbeing, and learning experience)

Key Policies and Documents in This Section

- Riks Policy
- Risk Management Plan
- Risk Appetite Statement
- Policy on Change and Crisis Management

18.1 Risk Policy

QA Area(s)	• Safety and Risk Management • Governance and Management of Quality
Applies to	☑ Staff only ☐ Learners only ☑ Staff and learners
Policy Owner	Operations Manager

Purpose

This Risk Policy establishes a comprehensive framework for identifying, assessing, monitoring, and mitigating risks across all operations of ELI Schools. The policy ensures that risk management is embedded in decision-making processes, strategic planning, and day-to-day operations to protect students, staff, stakeholders, and the institution's reputation while maintaining compliance with Quality and Qualifications Ireland (QQI) requirements and all applicable regulatory standards.

ELI Schools is committed to proactive risk management that supports the delivery of high-quality English language education and student support services while safeguarding the organization's sustainability, integrity, and mission.

Scope

This policy applies to all aspects of ELI Schools' operations, including but not limited to:

- Academic program delivery and quality assurance
- Student recruitment, enrolment, and support services
- Partnerships with external service providers
- Internship and work placement programs
- Data protection and information security
- Financial management and resource allocation
- Compliance with regulatory and accreditation requirements
- Staff recruitment, training, and performance management
- Facilities management and student safety
- Marketing and communications activities
- Strategic planning and organizational development

All employees, contractors, service providers, and partners are expected to understand and support the implementation of this policy within their respective areas of responsibility.

1. Risk Management Principles

ELI Schools' approach to risk management is guided by the following principles:

Proactive Identification — Risk management is an ongoing, proactive process rather than a reactive response to incidents. The organization systematically identifies potential risks before they materialize into issues that could impact students, operations, or compliance.

Comprehensive Assessment — All identified risks are assessed based on their likelihood of occurrence and potential impact on the organization, students, and stakeholders. Assessment considers both immediate and long-term consequences.

Proportionate Response — Risk mitigation strategies are proportionate to the level of risk, with resources allocated according to priority. High-impact, high-likelihood risks receive immediate attention and robust controls.

Integrated Approach — Risk management is integrated into all organizational processes, from strategic planning to operational procedures. It is not treated as a separate or isolated activity.

Continuous Improvement — The risk management framework is regularly reviewed and updated based on emerging risks, lessons learned, incident analysis, and changes in the operating environment.

Transparency and Accountability — Risk management processes are transparent, with clear accountability for risk ownership, monitoring, and mitigation. Risk information is communicated appropriately to relevant stakeholders.

Compliance Focus — Particular emphasis is placed on risks related to regulatory compliance, student welfare, and data protection, reflecting ELI Schools' commitment to operating with the highest ethical and legal standards.

2. Roles And Responsibilities

Senior Management Team

The Senior Management Team has ultimate responsibility for:
- Approving the Risk Policy, Risk Management Plan, and Risk Appetite Statement
- Ensuring adequate resources are allocated to risk management activities
- Reviewing high-level risk reports and making strategic decisions regarding risk mitigation
- Setting the tone for a risk-aware organizational culture
- Ensuring compliance with QQI requirements and regulatory obligations
- Approving major changes to risk management frameworks and procedures

Risk Committee

The Risk Committee (or designated risk management function) is responsible for:
- Coordinating risk identification and assessment activities across the organization
- Maintaining the Risk Register and ensuring it is current and comprehensive
- Facilitating quarterly risk reviews and annual comprehensive assessments
- Monitoring the implementation of risk mitigation strategies
- Reporting significant risks and incidents to Senior Management
- Providing guidance and support to Department Managers on risk management
- Ensuring risk management training is delivered to relevant staff
- Coordinating responses to emerging risks or crisis situations

Department Managers

Department Managers are responsible for:
- Identifying and assessing risks within their areas of responsibility
- Implementing risk mitigation strategies and controls
- Monitoring risks on an ongoing basis and reporting changes in risk levels
- Ensuring staff are aware of relevant risks and control measures
- Participating in risk assessment and review processes
- Escalating significant risks or incidents promptly
- Maintaining documentation related to risk management activities
- Integrating risk considerations into operational planning and decision-making

All Staff Members

All staff members are expected to:
- Be aware of risks relevant to their roles and responsibilities
- Follow established policies, procedures, and control measures
- Report potential risks, incidents, or control failures promptly
- Participate in risk management training and awareness activities
- Support the implementation of risk mitigation strategies
- Maintain a risk-aware mindset in daily activities

3. Risk Categories

ELI Schools recognizes the following primary categories of risk:

Operational Risk
Risks related to the day-to-day delivery of educational programs and support services, including teaching quality, student satisfaction, facilities management, and operational continuity.

Compliance and Regulatory Risk
Risks associated with failure to comply with QQI requirements, GDPR and data protection legislation, employment law, health and safety regulations, and other applicable legal and regulatory obligations.

Reputational Risk
Risks that could damage ELI Schools' reputation, brand, or standing with students, partners, regulators, or the broader community, including negative publicity, service failures, or ethical breaches.

Financial Risk
Risks related to financial sustainability, including revenue fluctuations, cost management, fraud, financial mismanagement, or inadequate financial controls.

Data Protection and Information Security Risk
Risks associated with data breaches, unauthorized access to personal information, loss of data, cyber-attacks, or non-compliance with GDPR and data protection requirements.

Partnership and Third-Party Risk
Risks arising from relationships with external service providers, including inadequate vetting, poor service quality, ethical violations, or failures by partners that impact students or ELI Schools' reputation

Student Welfare and Safety Risk
Risks that could compromise the physical, emotional, or psychological wellbeing of students, including safety incidents, inadequate support services, or failure to address student concerns.

Strategic Risk
Risks related to strategic decision-making, market changes, competitive pressures, or failure to adapt to evolving student needs and industry trends.

4. Risk Assessment Methodology

Risk Identification

Risks are identified through multiple channels:
- Systematic reviews conducted quarterly by the Risk Committee
- Department-level risk assessments conducted by managers
- Incident reporting and analysis
- Student and staff feedback mechanisms
- External audits and regulatory inspections
- Monitoring of industry trends and emerging risks
- Review of partnership and service provider performance

Risk Analysis

Each identified risk is analysed based on:
- **Likelihood:** The probability that the risk will materialize (High, Medium, Low)
- **Impact:** The potential consequences if the risk occurs (High, Medium, Low)
- **Risk Rating:** A combined assessment (e.g., High/High = Critical Risk)

Risk Evaluation

Risks are prioritized based on their rating, with consideration of:
- Alignment with ELI Schools' Risk Appetite Statement
- Existing controls and their effectiveness
- Resources required for mitigation
- Regulatory or compliance implications
- Potential impact on students and stakeholders

Documentation

All risk assessments are documented in the Risk Register, which includes:
- Risk description and category
- Likelihood and impact ratings
- Current controls in place
- Proposed mitigation strategies
- Risk owner and timeline for action
- Monitoring and review schedule

Review Frequency

- **Quarterly Reviews:** All risks in the Risk Register are reviewed quarterly
- **Annual Comprehensive Assessment:** A full organizational risk assessment is conducted annually
- **Ad Hoc Reviews:** Triggered by significant incidents, changes in operations, or emerging risks

5. Risk Response Protocols

Immediate Action Requirements

For each identified risk, appropriate mitigation strategies are developed, which may include:
- **Avoidance:** Eliminating the activity or exposure that creates the risk
- **Reduction:** Implementing controls to reduce likelihood or impact
- **Transfer:** Shifting risk to third parties (e.g., through insurance or contractual arrangements)
- **Acceptance:** Acknowledging the risk and monitoring it without additional mitigation (for low-level risks within risk appetite)

Certain risks require immediate action:
- Risks rated as High/High (Critical) must be escalated to Senior Management within 24 hours
- Compliance or regulatory risks must be addressed immediately to prevent violations
- Student welfare or safety risks require immediate protective measures
- Data breaches must be reported and contained according to GDPR requirements (within 72 hours

Risk Mitigation Strategies

Monitoring and Reporting	• Risk owners monitor their assigned risks on an ongoing basis • Changes in risk levels are reported to the Risk Committee promptly • Quarterly risk reports are provided to Senior Management • Annual risk management reports are prepared for governance and regulatory purposes
Incident Response	When risks materialize into incidents: • Immediate containment and protective measures are implemented • Incidents are documented and investigated to identify root causes • Lessons learned are incorporated into risk assessments and mitigation strategies • Affected stakeholders (students, staff, partners, regulators) are informed as appropriate • Remedial actions are implemented to prevent recurrence

5. Policy Review and Approval

Review Schedule	This Risk Policy is reviewed annually or more frequently if: • Significant changes occur in ELI Schools' operations or strategic direction • New regulatory requirements are introduced • Major incidents or risk events occur • QQI or other regulatory bodies recommend changes
Amendment Process	Amendments to this policy require approval by Senior Management and must be communicated to all relevant stakeholders. **Related Documents** This policy should be read in conjunction with: • Risk Management Plan • Risk Appetite Statement • Partnerships with Service Providers Policy • Interns and Internships Policy • Data Sharing Agreement Template • Quality Assurance Manual • Data Protection and GDPR Compliance Policies

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Related legislation, regulation or guidelines:

• Safety, Health and Welfare at Work Act 2005
• Fire Services Acts 1981 and 2003
• Building Control Acts and Regulations
• Code of Practice for Provision of Programmes of English Language Education to International Learners

18.2 Risk Management Plan

QA Area(s)	• Safety and Risk Management • Governance and Management of Quality		
Applies to	☑ Staff only	☐ Learners only	☑ Staff and learners
Policy Owner	Operations Manager		

Introduction

This Risk Management Plan operationalizes ELI Schools' Risk Policy by identifying specific risks, assessing their likelihood and potential impact, documenting existing controls, and establishing mitigation strategies. The plan is designed to ensure that ELI Schools maintains high standards of quality, compliance, and student welfare while protecting the organization's reputation and sustainability.

The plan identifies 15 key risk areas across operational, compliance, reputational, financial, data protection, partnership, and student welfare categories. Each risk is assigned an owner, rated according to likelihood and impact, and linked to specific mitigation strategies and timelines.

This plan is a living document that is reviewed quarterly and updated as risks evolve, new risks emerge, or mitigation strategies are implemented. It serves as the primary tool for coordinating risk management activities across the organization and ensuring accountability for risk mitigation.

RISK REGISTER

RISK 1: Inadequate Vetting of Service Providers

Category:	Partnership/Third-Party Risk
Description:	Failure to conduct thorough due diligence on external service providers (employment agencies, accommodation providers, university partners, etc.) before establishing partnerships, resulting in poor service quality, ethical violations, or harm to students.
Likelihood:	Medium
Impact:	High
Risk Rating:	High
Current Controls:	• Partnerships with Service Providers Policy requiring due diligence • Service Provider Partner Agreement with quality standards • Initial vetting checklist and documentation requirements
Mitigation Strategies:	• Implement comprehensive due diligence checklist with mandatory documentation (business registration, insurance, references, compliance certificates) • Conduct background checks and reference verification for all new partners • Require trial period (3-6 months) before full partnership establishment • Establish clear rejection criteria for providers who do not meet standards • Document all vetting decisions and maintain audit trail
Risk Owner:	• Operations Manager / Partnerships Manager
Review Frequency:	• Quarterly monitoring of vetting process effectiveness

RISK 2: Data Breaches or GDPR Violations

Category:	Data Protection and Information Security Risk
Description:	Unauthorized access, loss, theft, or misuse of student personal data, either within ELI Schools or by service providers, resulting in GDPR violations, regulatory penalties, reputational damage, and harm to students.
Likelihood:	Medium
Impact:	High
Risk Rating:	High

Current Controls:
- Data Sharing Agreement template requiring GDPR compliance
- Data protection policies and procedures
- Staff training on data protection
- Access controls and password policies

Mitigation Strategies:
- Implement comprehensive data security measures (encryption, multi-factor authentication, regular backups)
- Conduct annual data protection audits and vulnerability assessments
- Provide mandatory GDPR training for all staff handling personal data (annually)
- Establish 24-hour data breach notification protocol
- Conduct regular reviews of service provider data protection practices
- Implement data minimization principles (collect only necessary data)
- Establish clear data retention and deletion schedules
- Appoint Data Protection Officer or designate responsible person

Risk Owner:
- Data Protection Officer / IT Manager

Review Frequency:
- Quarterly security reviews; annual comprehensive audit

Risk 3: Student Complaints Not Addressed Promptly

Category:	Operational Risk / Student Welfare Risk
Description:	Failure to acknowledge, investigate, or resolve student complaints within established timeframes, leading to student dissatisfaction, escalation to regulators, reputational damage, and potential QQI compliance issues.
Likelihood:	Medium
Impact:	Medium
Risk Rating:	Medium

Current Controls:
- Student complaint procedure in Partnerships Policy
- Multiple complaint channels (email, in-person, online form)
- Designated complaint handlers

Mitigation Strategies:
- Implement complaint tracking system with automated reminders for deadlines
- Assign backup complaint handlers to ensure coverage during absences
- Provide training to staff on complaint handling and de-escalation
- Conduct monthly reviews of complaint logs to identify trends
- Establish escalation protocol for complex or unresolved complaints
- Communicate complaint procedures clearly to all students at enrolment
- Publish complaint statistics and resolution rates in annual reports

Risk Owner:
- Operations Manager

Review Frequency:
- Monthly complaint log reviews; quarterly trend analysis

RISK 4: Service Provider Ethical Violations

Category:	Partnership/Third-Party Risk / Reputational Risk
Description:	Service providers engage in unethical conduct such as false advertising, hidden fees, discrimination, coercion, or other prohibited activities, damaging ELI Schools' reputation and harming students.
Likelihood:	Low
Impact:	High
Risk Rating:	Medium-High

Current Controls:
- Service Provider Partner Agreement with ethical standards and prohibited activities
- Quarterly monitoring of active partnerships
- Student feedback mechanisms
- Termination provisions for ethical violations

Mitigation Strategies:
- Conduct unannounced spot checks or mystery shopping exercises
- Implement mandatory ethics training for service provider staff
- Establish anonymous reporting channel for students to report concerns
- Review service provider marketing materials and communications regularly
- Require service providers to submit quarterly compliance declarations
- Maintain detailed incident log for all ethical concerns
- Establish rapid response protocol for serious violations (immediate suspension)
- Communicate consequences clearly in partnership agreements

Risk Owner:
- Partnerships Manager / Compliance Officer

Timeline:
- Q2 for enhanced monitoring; ongoing implementation

Review Frequency:
- Quarterly partnership reviews; immediate response to incidents

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RISK 5: Poor Internship Supervision

Category:	Operational Risk / Student Welfare Risk
Description:	Inadequate supervision, mentoring, or support for interns during placements, resulting in poor learning outcomes, safety concerns, exploitation, or non-compliance with employment law.
Likelihood:	Medium
Impact:	Medium
Risk Rating:	Medium

Current Controls:
- Interns and Internships Policy distinguishing unpaid and paid (employment)
- Supervision requirements and mentor assignment
- Regular check-ins and feedback sessions

Mitigation Strategies:
- Develop detailed internship supervision guidelines and mentor training program
- Require weekly check-ins between interns and ELI Schools coordinator
- Conduct site visits to internship placements (minimum once per placement)
- Implement mid-placement and end-of-placement evaluations
- Establish clear escalation procedure for interns to report concerns
- Require host organizations to designate qualified supervisors
- Provide orientation for both interns and host organization supervisors
- Monitor compliance with working hours, tasks, and learning objectives

Risk Owner:
- Partnerships Manager / Compliance Officer

Review Frequency:
- Quarterly partnership reviews; immediate response to incidents

RISK 6: Reputational Damage from Partner Failures

Category:	Reputational Risk / Partnership Risk
Description:	Service provider failures, scandals, or poor performance reflect negatively on ELI Schools, damaging reputation with students, regulators, and the broader community.
Likelihood:	Low
Impact:	High
Risk Rating:	Medium-High

Current Controls:
- Declaration of Independence stating no ownership or financial interest in partners
- Partnership monitoring and performance reviews
- Termination provisions for poor performance

Mitigation Strategies:
- Conduct regular media and online reputation monitoring for all partners
- Establish crisis communication protocol for partner-related incidents
- Require partners to notify ELI Schools immediately of any negative publicity or regulatory issues
- Maintain clear public messaging about independence from partners
- Diversify service provider portfolio to avoid over-reliance on single providers
- Establish rapid disengagement protocol for partners facing serious issues
- Communicate proactively with students if partner issues arise
- Maintain insurance coverage for reputational harm

Risk Owner:
- Marketing Manager / Senior Management

Timeline:
- Q2 for protocol development; ongoing monitoring

Review Frequency:
- Monthly media monitoring; quarterly partner reputation review

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RISK 7: Inadequate Record Keeping

Category:	Compliance Risk / Operational Risk
Description:	Failure to maintain accurate, complete, and accessible records of partnerships, student services, complaints, risk assessments, and other key activities, resulting in QQI non-compliance, audit failures, or inability to demonstrate due diligence.
Likelihood:	Medium
Impact:	Medium
Risk Rating:	Medium

Current Controls:
- 6-year record retention requirement in Partnerships Policy
- Documentation requirements in Service Provider Partner Agreement
- Risk Register and assessment documentation

Mitigation Strategies:
- Implement centralized document management system with version control
- Develop comprehensive record-keeping guidelines specifying what to document
- Assign record-keeping responsibilities to specific roles
- Conduct quarterly record-keeping audits to identify gaps
- Provide training to staff on documentation requirements and systems
- Establish backup and disaster recovery procedures for records
- Create standardized templates for key documents
- Schedule regular archive reviews to ensure retention compliance

Risk Owner:
- Quality Assurance Manager / Administrative Manager

Review Frequency:
- Quarterly audits; annual comprehensive review

RISK 8: Staff Not Trained on Policies

Category:	Operational Risk / Compliance Risk
Description:	Staff members are unaware of or do not understand key policies (partnerships, internships, data protection, risk management), leading to non-compliance, inconsistent implementation, or failure to identify and escalate risks.
Likelihood:	Medium
Impact:	Medium
Risk Rating:	Medium

Current Controls:
- Policy documents available to staff
- Periodic staff meetings and communications

Mitigation Strategies:
- Develop comprehensive staff training program covering all key policies
- Provide mandatory training for new hires within first month of employment
- Conduct annual refresher training for all staff
- Implement training tracking system to monitor completion
- Develop policy summaries and quick reference guides for staff
- Include policy compliance in staff performance evaluations
- Conduct periodic knowledge assessments or quizzes
- Establish policy champions or subject matter experts in each department
- Communicate policy updates immediately with explanation of changes

Risk Owner:
- Human Resources Manager / Quality Assurance Manager

Review Frequency:
- Quarterly training completion monitoring; annual program review

RISK 9: Student Safety Concerns

Category:	Student Welfare and Safety Risk
Description:	Physical, emotional, or psychological harm to students due to unsafe facilities, inadequate emergency procedures, harassment, discrimination, or failure to address safety concerns promptly.
Likelihood:	Low
Impact:	High
Risk Rating:	Medium-High

Current Controls:
- Health and safety policies and procedures
- Emergency response protocols
- Student support services

Mitigation Strategies:
- Conduct comprehensive safety audits of all facilities (quarterly)
- Implement 24/7 emergency contact system for students
- Provide safety orientation for all new students
- Establish clear reporting procedures for safety concerns
- Conduct regular fire drills and emergency preparedness exercises
- Implement anti-harassment and anti-discrimination policies with clear reporting
- Provide staff training on recognizing and responding to student distress
- Establish relationships with local emergency services and medical facilities
- Conduct risk assessments for all student activities and excursions
- Maintain comprehensive insurance coverage for student incidents

Risk Owner:
- Facilities Manager / Student Welfare Officer

Review Frequency:
- Quarterly safety audits; immediate response to incidents

RISK 10: Financial Mismanagement of Partnerships

Category:	Financial Risk / Partnership Risk
Description:	Inadequate financial controls over partnership arrangements, including undisclosed payments, kickbacks, conflicts of interest, or financial arrangements that compromise independence or student interests
Likelihood:	Low
Impact:	High
Risk Rating:	Medium

Current Controls:
- Declaration of Independence in Partnerships Policy
- Prohibition on financial interests in service providers
- Ethical standards in Service Provider Partner Agreement

Mitigation Strategies:
- Implement annual conflict of interest declarations for all staff involved in partnerships
- Establish clear financial approval processes for partnership arrangements
- Conduct regular financial audits of partnership-related transactions
- Require transparency in all financial arrangements with partners
- Prohibit staff from accepting gifts or benefits from service providers beyond nominal value
- Establish whistleblower protection for reporting financial irregularities
- Maintain detailed financial records of all partnership-related income and expenses
- Conduct periodic reviews to ensure no undisclosed financial relationships exist

Risk Owner:
- Finance Manager / Senior Management

Review Frequency:
- Annual financial audits; quarterly transaction reviews

RISK 11: Regulatory Non-Compliance (QQI)

Category:	Compliance and Regulatory Risk
Description:	Failure to meet QQI requirements for quality assurance, program delivery, student protection, record-keeping, or other regulatory obligations, resulting in sanctions, loss of accreditation, or reputational damage.
Likelihood:	Low
Impact:	High
Risk Rating:	Medium-High

Current Controls:
- Quality Assurance Manual and policies
- Regular internal reviews and audits
- Compliance monitoring procedures

Mitigation Strategies:
- Assign dedicated QQI compliance officer or responsibility
- Implement compliance checklist for all key activities
- Maintain ongoing communication with QQI and monitor regulatory updates
- Conduct mock inspections or self-assessments annually
- Establish rapid response protocol for QQI inquiries or inspection notices
- Provide training to staff on QQI requirements relevant to their roles
- Maintain comprehensive documentation demonstrating compliance
- Participate in QQI provider forums and professional development

Risk Owner:
- Quality Assurance Manager / Senior Management

Review Frequency:
- Quarterly compliance reviews; annual comprehensive assessment

RISK 12: Service Quality Failures

Category:	Operational Risk / Reputational Risk
Description:	Decline in quality of educational programs, student support services, or partner services, resulting in student dissatisfaction, poor outcomes, negative reviews, and potential regulatory concerns.
Likelihood:	Medium
Impact:	Medium
Risk Rating:	Medium

Current Controls:
- Quality assurance procedures and monitoring
- Student feedback mechanisms
- Performance reviews for staff and partners

Mitigation Strategies:
- Implement comprehensive quality monitoring framework with clear KPIs
- Conduct regular student satisfaction surveys (end-of-course, quarterly, annual)
- Establish quality benchmarks and targets for all key services
- Conduct peer observations and teaching quality reviews
- Implement continuous improvement processes based on feedback
- Provide ongoing professional development for teaching and support staff
- Monitor online reviews and social media for quality concerns
- Establish early warning system for declining quality indicators
- Conduct root cause analysis for quality failures
- Implement corrective action plans with clear timelines and accountability

Risk Owner:
- Academic Manager / Quality Assurance Manager

Review Frequency:
- Monthly KPI monitoring; quarterly comprehensive review

RISK 13: Conflict of Interest Issues

Category:	Compliance Risk / Reputational Risk
Description:	Undisclosed conflicts of interest involving staff, management, or partners that compromise decision-making, student interests, or organizational integrity.
Likelihood:	Low
Impact:	Medium
Risk Rating:	Low-Medium

Current Controls:
- Declaration of Independence in Partnerships Policy
- Ethical standards and prohibited activities

Mitigation Strategies:
- Implement annual conflict of interest declaration process for all staff
- Establish clear conflict of interest policy with disclosure requirements
- Require disclosure of any personal or financial relationships with partners
- Establish recusal procedures for decision-making when conflicts exist
- Provide training on recognizing and managing conflicts of interest
- Maintain register of declared conflicts and how they are managed
- Establish independent review process for partnership decisions
- Include conflict of interest provisions in employment contracts
- Conduct periodic audits of potential conflicts

Risk Owner:
- Human Resources Manager / Compliance Officer

Review Frequency:
- Annual declaration process; quarterly monitoring

RISK 14: Communication Breakdowns with Students

Category:	Operational Risk / Student Welfare Risk
Description:	Inadequate, unclear, or untimely communication with students regarding policies, procedures, services, changes, or important information, leading to confusion, dissatisfaction, or missed opportunities.
Likelihood:	Medium
Impact:	Low
Risk Rating:	Low-Medium

Current Controls:
- Multiple communication channels (email, website, in-person)
- Student orientation and information sessions
- Student handbook and policy documents

Mitigation Strategies:
- Develop comprehensive student communication strategy
- Implement centralized communication platform (student portal, app, or system)
- Establish communication standards (response times, clarity, accessibility)
- Provide information in multiple formats (written, verbal, visual)
- Conduct regular communication audits to identify gaps
- Gather student feedback on communication effectiveness
- Assign dedicated student communication coordinator
- Implement multilingual support where needed
- Establish emergency communication protocols
- Provide communication skills training for student-facing staff

Risk Owner:
- Student Services Manager / Communications Officer

Review Frequency:
- Quarterly communication effectiveness review

RISK 15: Third-Party Liability Issues

Category:	Partnership Risk / Financial Risk
Description:	Legal liability arising from actions or failures of service providers, including negligence, breach of contract, harm to students, or regulatory violations, potentially exposing ELI Schools to legal action or financial loss.
Likelihood:	Low
Impact:	High
Risk Rating:	Medium

Current Controls:
- Service Provider Partner Agreement with liability provisions
- Insurance requirements for service providers
- Indemnification clauses

Mitigation Strategies:
- Verify insurance coverage annually and maintain copies of certificates
- Include robust indemnification clauses in all partnership agreements
- Conduct legal review of partnership agreements before execution
- Establish clear contractual terms regarding liability allocation
- Maintain ELI Schools' own comprehensive insurance coverage
- Require service providers to notify ELI Schools of any legal claims or incidents
- Establish legal response protocol for third-party liability issues
- Conduct periodic legal compliance reviews of partnership arrangements
- Maintain detailed documentation of due diligence and monitoring activities

Risk Owner:
- Legal Advisor / Partnerships Manager

Review Frequency:
- Annual insurance verification; quarterly legal compliance review

Risk Monitoring Procedures

Quarterly Risk Reviews	• Risk Committee convenes quarterly to review all risks in the Risk Register • Risk owners provide updates on mitigation strategy implementation • Risk ratings are reassessed based on current circumstances and controls • New risks are identified and added to the register • Completed mitigation actions are documented • High-priority risks are escalated to Senior Management
Escalation Triggers	Immediate escalation to Senior Management is required when: • Any risk is rated as High/High (Critical) • A risk materializes into a significant incident • A new high-impact risk is identified • Mitigation strategies are failing or insufficient • Regulatory or compliance violations occur • Student safety is compromised • Data breaches occur • Reputational damage is imminent or occurring

Reporting	• Quarterly risk reports are provided to Senior Management summarizing:
	   o Current risk landscape and top risks
	   o Changes in risk ratings
	   o Mitigation strategy progress
	   o Incidents and lessons learned
	   o Emerging risks
	   o Resource needs for risk management
	• Annual comprehensive risk management report is prepared for governance and regulatory purposes

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Related legislation, regulation or guidelines:

• Safety, Health and Welfare at Work Act 2005
• Fire Services Acts 1981 and 2003
• Building Control Acts and Regulations
• Code of Practice for Provision of Programmes of English Language Education to International Learners

18.3 Risk Appetite Statement

Introduction And Purpose

This Risk Appetite Statement defines the level and types of risk that ELI Schools is willing to accept in pursuit of its strategic objectives. It provides a framework for decision-making, ensuring that risks are taken consciously, managed appropriately, and aligned with the organization's values, mission, and regulatory obligations.

Risk appetite is not about avoiding all risks—it is about understanding which risks are acceptable, which require mitigation, and which are unacceptable under any circumstances. This statement guides staff, management, and partners in making risk-informed decisions that balance opportunity with prudent risk management.

ELI Schools' risk appetite reflects its commitment to:

- Providing high-quality English language education
- Protecting student welfare and safety above all else
- Maintaining full compliance with regulatory requirements
- Operating with integrity, transparency, and ethical standards
- Building and protecting organizational reputation
- Ensuring financial sustainability
- Pursuing strategic growth in a controlled manner

2. Definition Of Risk Appetite

Risk Appetite is the amount and type of risk that ELI Schools is willing to accept in pursuit of its objectives. It represents the boundary between acceptable and unacceptable risk-taking.

Risk Tolerance is the acceptable variation in performance relative to objectives. It defines specific thresholds or limits for different risk categories.

Risk Capacity is the maximum level of risk that ELI Schools can bear given its resources, capabilities, and operating environment.

ELI Schools' risk appetite is conservative overall, with zero tolerance for risks that could compromise student welfare, regulatory compliance, or data protection. The organization is willing to accept moderate, well-managed risks in areas that support strategic growth and operational improvement, provided they do not conflict with core values and compliance obligations.

3. Risk Appetite by Category

Compliance and Regulatory Risk

Risk Appetite: **Zero Tolerance**

ELI Schools has zero tolerance for non-compliance with:
- Quality and Qualifications Ireland (QQI) requirements and standards
- General Data Protection Regulation (GDPR) and Irish Data Protection Act 2018
- Employment law and regulations governing internships and work placements
- Health and safety legislation
- Immigration requirements and reporting
- Any other applicable legal or regulatory obligations

Rationale:
- Regulatory compliance is non-negotiable and fundamental to operating legitimacy
- Non-compliance can result in loss of accreditation, legal penalties, and reputational damage
- Student trust and institutional credibility depend on full compliance

Decision Framework:
- Any activity or decision that risks non-compliance is unacceptable
- Compliance concerns must be escalated immediately and resolved
- Resources must be allocated to ensure compliance, regardless of cost
- When in doubt, seek legal or regulatory guidance before proceeding

Tolerance Thresholds:
- Zero tolerance for any compliance violations
- Immediate corrective action required for any identified compliance gaps
- Proactive disclosure to regulators if compliance issues are discovered

Student Welfare and Safety Risk

Risk Appetite: **Zero Tolerance**

ELI Schools has zero tolerance for risks that could compromise:
- Physical safety of students
- Emotional or psychological wellbeing of students
- Protection from harassment, discrimination, or exploitation
- Access to appropriate support services
- Fair treatment and respect for student rights

Rationale:
- Student welfare is the paramount priority and core to ELI Schools' mission
- The organization has a duty of care to all students
- Harm to students is unacceptable and inconsistent with organizational values

Decision Framework:
- Student welfare considerations override all other factors in decision-making
- Any activity that poses risk to student safety must be avoided or mitigated to acceptable levels before proceeding
- Student concerns about safety or welfare must be taken seriously and addressed immediately
- Resources must be allocated to protect student welfare, regardless of cost

Tolerance Thresholds:
- Zero tolerance for any preventable harm to students
- Immediate intervention required for any identified safety concerns
- Comprehensive investigation and remediation for any student welfare incidents

Data Protection and Privacy Risk

Risk Appetite:	**Zero Tolerance**

ELI Schools has zero tolerance for:

- Unauthorized access to or disclosure of personal data
- Data breaches or security incidents
- Non-compliance with GDPR requirements
- Inadequate data protection measures
- Misuse of student or staff personal information

Rationale:
- Data protection is a legal obligation under GDPR with significant penalties for violations
- Students and staff trust ELI Schools with sensitive personal information
- Data breaches can cause significant harm to individuals and reputational damage to the organization

Decision Framework:
- Data protection requirements must be met in all activities and partnerships
- Any system, process, or partnership that poses data protection risks must be thoroughly assessed and mitigated before implementation
- Data minimization principles must be applied (collect only necessary data)
- Service providers must demonstrate GDPR compliance before data sharing

Tolerance Thresholds:
- Zero tolerance for data breaches or unauthorized access
- 24-hour notification requirement for any suspected data security incidents
- Immediate suspension of any service provider involved in data breach
- Mandatory data protection impact assessments for new systems or partnerships

Operational Risk

Risk Appetite:	**Low Tolerance**

ELI Schools has low tolerance for operational risks that could:

- Disrupt educational program delivery
- Compromise teaching or service quality
- Cause significant inconvenience to students
- Damage operational efficiency or effectiveness
- However, the organization accepts that some operational risks are inherent in running an educational institution and can be managed through controls.

Rationale:
- Operational continuity is essential for student satisfaction and outcomes
- Quality of education and services is a key differentiator and value proposition
- Some operational risks are unavoidable but can be mitigated

Decision Framework:
- Operational changes or initiatives must be carefully planned and risk-assessed
- Contingency plans must be in place for critical operations
- Pilot programs or phased implementation preferred for significant changes
- Student impact must be minimized during operational changes

Tolerance Thresholds:
- Acceptable: Minor, temporary disruptions that are well-communicated and managed
- Unacceptable: Prolonged disruptions, repeated failures, or significant quality degradation

Reputational Risk

Risk Appetite: **Low Tolerance**

ELI Schools has low tolerance for risks that could:
- Damage the organization's reputation with students, partners, or regulators
- Result in negative publicity or social media criticism
- Undermine trust in the institution
- Affect student recruitment or retention

Rationale:
- Reputation is a critical asset that takes years to build and can be quickly damaged
- Reputation affects student recruitment, regulatory relationships, and partnership opportunities
- Reputational damage can have long-lasting financial and operational consequences

Decision Framework:
- Reputational impact must be considered in all major decisions
- Partnerships and activities that pose reputational risk must be carefully evaluated
- Transparency and proactive communication are essential for reputation protection
- Rapid response required for any reputational threats

Tolerance Thresholds:
- Acceptable: Minor, isolated incidents that are promptly addressed and resolved
- Unacceptable: Repeated issues, serious ethical violations, or systemic problems
- Immediate action required for any significant negative publicity
- Partnership termination required if partner actions damage ELI Schools' reputation

Partnership and Third-Party Risk

Risk Appetite: **Low to Medium Tolerance**

ELI Schools has low to medium tolerance for partnership risks, recognizing that:
- Partnerships with external service providers enhance student experience and outcomes
- Partnerships involve inherent risks that can be managed through due diligence and monitoring
- The benefits of quality partnerships outweigh the risks when properly managed

Rationale:
- Partnerships are essential for providing comprehensive student support services
- Careful vetting and ongoing monitoring can mitigate most partnership risks
- The organization maintains independence and can terminate partnerships if needed

Decision Framework:
- All partnerships must undergo thorough due diligence before establishment
- Service Provider Partner Agreements must be executed with clear quality standards
- Ongoing monitoring and performance reviews are mandatory
- Student feedback must be actively collected and acted upon
- Partnerships must be terminated if quality or ethical standards are not met

Tolerance Thresholds:
- Acceptable: Minor service quality issues that are promptly addressed
- Unacceptable: Ethical violations, repeated quality failures, student complaints, or reputational damage
- Maximum acceptable student complaint rate: [e.g., 5% of students using service]
- Minimum acceptable student satisfaction with partner services: [e.g., 75%]
- Immediate suspension for serious ethical violations or student welfare concerns

Financial Risk

Risk Appetite: **Medium Tolerance**

ELI Schools has medium tolerance for financial risks, recognizing that:
- Financial sustainability is essential for long-term viability
- Some financial risk is necessary for growth and development
- Financial risks must be carefully managed and not compromise core operations

Rationale:
- Financial stability enables the organization to fulfil its mission
- Strategic investments may involve financial risk but can yield long-term benefits
- Financial reserves and prudent management provide capacity to absorb some risk

Decision Framework:
- Financial risks must be assessed and approved by Senior Management
- Major financial commitments require business case and risk analysis
- Financial reserves must be maintained at prudent levels
- Diversification of revenue sources is preferred to reduce dependency
- Financial controls and oversight must be robust

Tolerance Thresholds:
- Acceptable: Calculated financial risks with clear potential returns and manageable downside
- Unacceptable: Risks that could threaten financial viability or compromise core operations
- Maximum acceptable financial loss from any single initiative: [e.g., 5% of annual revenue]
- Minimum acceptable financial reserve: [e.g., 3-6 months operating expenses]

Strategic Risk

Risk Appetite: **Medium Tolerance**

ELI Schools has medium tolerance for strategic risks associated with:
- New program development or market expansion
- Adoption of new technologies or teaching methodologies
- Strategic partnerships or collaborations
- Organizational change and development

Rationale:
- Strategic growth and innovation are necessary for long-term success
- The educational landscape is evolving, requiring adaptation and innovation
- Calculated strategic risks can position the organization for future success

Decision Framework:
- Strategic initiatives must be aligned with organizational mission and values
- Strategic risks must be assessed through formal planning and analysis
- Pilot programs or phased implementation preferred for major strategic changes
- Exit strategies or contingency plans should be developed for significant strategic initiatives
- Strategic risks must not compromise compliance, student welfare, or core operations

Tolerance Thresholds:
- Acceptable: Well-planned strategic initiatives with clear objectives, risk mitigation, and success metrics
- Unacceptable: Poorly planned initiatives, risks that threaten core operations, or strategies inconsistent with values
- Maximum acceptable investment in unproven strategic initiatives: [e.g., 10% of annual budget]
- Minimum acceptable success criteria must be defined before proceeding
- Regular review and adjustment of strategic initiatives based on performance

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4. Risk Decision Framework

Decision-Making at Different Risk Levels

Zero Tolerance Risks (Compliance, Student Welfare, Data Protection):

- No activity or decision that creates these risks is acceptable
- Immediate escalation to Senior Management required
- Activity must be stopped or modified to eliminate risk
- No exceptions or risk acceptance permitted

Low Tolerance Risks (Operational, Reputational):

- Risks must be minimized through robust controls and mitigation
- Senior Management approval required for activities with residual low tolerance risks
- Continuous monitoring and rapid response to emerging issues
- Risk acceptance only with comprehensive mitigation plan

Medium Tolerance Risks (Partnership, Financial, Strategic):

- Risks must be carefully assessed and managed
- Management approval required based on risk level and potential impact
- Clear risk mitigation strategies and monitoring must be in place
- Risk acceptance permitted when benefits outweigh risks and controls are adequate
- Regular review and adjustment based on performance

Escalation Requirements

Immediate Escalation to Senior Management:

- Any zero-tolerance risk identified
- Any risk that exceeds defined tolerance thresholds
- Any incident or near-miss involving student welfare, compliance, or data protection
- Any significant reputational threat
- Any partnership issue that cannot be resolved at operational level

Quarterly Reporting to Senior Management:

- Summary of all medium and low tolerance risks
- Status of risk mitigation strategies
- Emerging risks and trends
- Risk management performance metrics

Risk Monitoring and Reporting

Ongoing Monitoring	- Risk owners monitor assigned risks continuously - Risk Committee reviews Risk Register quarterly - Key risk indicators (KRIs) tracked and reported monthly - Incident reports and near-misses analysed for risk implications
Reporting Frequency	**Monthly:** Key risk indicators and critical risk updates **Quarterly:** Comprehensive risk reports to Senior Management **Annually:** Full risk landscape assessment and Risk Appetite Statement review

18.4 Change and Crisis Management Policy

QA Area(s)	• Safety and Risk Management • Governance and Management of Quality
Applies to	☑ Staff only ☐ Learners only ☑ Staff and learners
Policy Owner	Operations Manager

1. Purpose

This Change and Crisis Management Policy establish a comprehensive framework for managing both planned organizational changes and unexpected crisis situations across all ELI Schools programs and operations. The policy ensures that changes are implemented systematically with appropriate assessment, consultation, and support, while crisis situations are managed effectively to protect learners, maintain continuity of education, and safeguard the organization's mission and reputation.

ELI Schools recognizes that effective change management is essential for continuous improvement, adaptation to evolving educational needs, and maintaining compliance with Quality and Qualifications Ireland (QQI) requirements. Equally, robust crisis management procedures are critical for responding to emergencies in a coordinated, timely manner that prioritizes student welfare and operational continuity.

This policy provides clear guidance on:
- How planned changes are assessed, approved, communicated, and implemented
- How crisis situations are identified, escalated, and managed
- Roles and responsibilities for change and crisis management
- Communication protocols for stakeholders during changes and emergencies
- Integration with ELI Schools' broader risk management and quality assurance frameworks

By establishing systematic approaches to both planned and unplanned events, ELI Schools demonstrates its commitment to responsible governance, stakeholder protection, and organizational resilience.

2. Scope

This policy applies to all aspects of ELI Schools' operations, including:

Organizational Coverage
- All ELI Schools locations and facilities
- All educational programs and courses
- All academic and administrative departments
- All staff members (teaching, administrative, management)
- All students enrolled in ELI Schools programs
- All external partners and service providers
- All stakeholders affected by organizational changes or crises

Types of Changes Covered

This policy governs all significant planned changes, including but not limited to:
- Introduction of new educational programs or courses
- Revisions to program curricula or learning outcomes
- Changes to delivery modes (e.g., transition to online or blended learning)
- Changes to organizational or management structure
- Changes to premises, facilities, or learning environments
- Implementation of new technology systems or platforms
- Establishment of new partnerships with third-party providers
- Changes to policies, procedures, or quality assurance processes
- Changes to staffing models or resource allocation
- Changes to student support services or administrative processes

Types of Crises Covered

This policy governs responses to crisis situations, including but not limited to:
- Serious building or facility incidents (structural damage, safety hazards)
- Fire, flood, or other environmental emergencies
- Pandemic or public health emergencies
- Loss of critical IT systems or cybersecurity incidents
- Sudden loss of key staff members or leadership
- Safeguarding or student welfare emergencies
- Natural disasters affecting operations or facilities
- Government or regulatory interventions or sanctions
- Reputational crises or significant negative publicity
- Financial crises threatening organizational viability
- Service provider failures affecting students
- Major data breaches or GDPR violations

Exclusions

Minor operational adjustments that do not significantly impact students, staff, or organizational operations may be managed through standard operational procedures without formal change management processes. However, any change that could affect student learning outcomes, safety, or satisfaction must be assessed under this policy.

3. Definitions

For the purposes of this policy, the following definitions apply:

Planned Change — A deliberate, proactive modification to any aspect of ELI Schools' operations, programs, structure, or processes that is initiated to improve quality, efficiency, compliance, or student outcomes. Planned changes are anticipated, assessed, and implemented according to structured procedures.

Change Request — A formal proposal to implement a planned change, submitted by a staff member, department, or management team, which includes a description of the proposed change, rationale, impact assessment, resource requirements, and implementation plan.

Crisis or Emergency — An unexpected, urgent situation that poses immediate or imminent risk to student welfare, staff safety, operational continuity, regulatory compliance, or organizational reputation, requiring rapid response and coordinated action to mitigate harm and restore normal operations.

Crisis Management Team — A designated group of senior management and key personnel responsible for coordinating the organization's response to crisis situations, making urgent decisions, and communicating with stakeholders during emergencies.

Stakeholders — All individuals or groups affected by or having an interest in organizational changes or crises, including:
- Current students and prospective students
- Teaching and academic staff
- Administrative and support staff
- Management and leadership
- External partners and service providers
- Regulatory bodies (QQI, government agencies)
- Parents, guardians, or sponsors (where applicable)
- Local community and neighbours

Business Continuity — The capability of ELI Schools to continue delivering essential educational services and maintaining critical operations during and after a crisis or disruptive event.

Change Impact Assessment — A systematic evaluation of how a proposed change will affect students, staff, operations, resources, compliance, and other aspects of the organization, used to inform decision-making and planning.

Continuity of Learning — The ongoing provision of educational instruction, student support, and assessment activities with minimal disruption, ensuring students can progress toward their learning objectives even during changes or crises.

4. Key Principles

ELI Schools manages change and crisis situations based on the following core principles:

Protection of Learners	**Learners' ability to continue their studies safely and effectively**
	All change and crisis management decisions prioritize student welfare, safety, and educational outcomes. No change will be implemented, and no crisis response will be undertaken, that compromises student protection or wellbeing. Students' physical, emotional, and academic needs are paramount in all decision-making.
	Application:
	• Student safety assessments are mandatory for all significant changes
	• Crisis responses prioritize immediate protection of students
	• Student support services are maintained or enhanced during transitions
	• Student feedback is actively sought and incorporated into change planning
	• Vulnerable students receive additional support during changes or crises
Continuity of Learning	**Teaching and academic activities should continue with minimal disruption.**
	ELI Schools is committed to maintaining educational delivery and student progress even during significant changes or crisis situations. Contingency plans ensure that learning continues through alternative arrangements when normal operations are disrupted.
	Application:
	• Alternative delivery methods are prepared for crisis scenarios
	• Academic calendars and assessment schedules are protected where possible
	• Catch-up or remedial support is provided if disruptions occur
	• Learning resources remain accessible during transitions
	• Communication with students about academic continuity is clear and timely
Transparency	**All relevant stakeholders will be informed of significant changes.**
	ELI Schools operates with openness and honesty in communicating about changes and crises. Stakeholders receive timely, accurate information appropriate to their needs and roles, enabling them to understand situations, make informed decisions, and provide input where appropriate.
	Application:
	• Change proposals are communicated to affected stakeholders before implementation
	• Crisis situations are communicated promptly with regular updates
	• Rationale for decisions is explained clearly
	• Opportunities for stakeholder consultation are provided for major changes
	• Communication channels are accessible and responsive
Accountability	**Responsibility for decision-making and implementation will be clearly defined.**
	Clear lines of authority and responsibility ensure that changes are managed effectively, and crises are responded to decisively. Individuals and teams understand their roles, and decision-making processes are documented and transparent.
	Application:
	• Change sponsors and project owners are designated for all significant changes
	• Crisis Management Team roles and responsibilities are clearly defined
	• Decision-making authority is specified for different types of changes and crises
	• Actions and decisions are documented for accountability and learning
	• Performance in managing changes and crises is reviewed and evaluated

Risk Management	**Potential risks will be assessed before changes are implemented.**
	All planned changes undergo risk assessment to identify potential negative consequences and develop mitigation strategies. Crisis management procedures are informed by risk analysis and designed to minimize harm. This principle ensures integration with ELI Schools' broader Risk Management framework.
	Application:
	• Change Impact Assessments include risk evaluation
	• Risk mitigation strategies are developed before change implementation
	• Crisis scenarios are anticipated and planned for through risk assessment
	• Lessons learned from changes and crises inform future risk management
	• Risk appetite guides decision-making about changes and crisis responses

5. Planned Change Management

ELI Schools recognizes the following categories of planned changes, each requiring assessment and management under this policy:

Academic and Program Changes	• **New Program Introduction:** Development and launch of new courses, programs, or qualifications
	• **Curriculum Revisions:** Modifications to learning outcomes, content, assessment methods, or program structure
	• **Delivery Mode Changes:** Transitions between face-to-face, online, blended, or hybrid delivery models
	• **Assessment Changes:** Modifications to assessment strategies, methods, or grading systems
	• **Program Discontinuation:** Phasing out or closure of existing programs
Organizational and Structural Changes	• **Management Structure Changes:** Reorganization of leadership, reporting lines, or departmental structure
	• **Staffing Model Changes:** Modifications to staffing levels, roles, or responsibilities
	• **Governance Changes:** Revisions to decision-making structures or authority levels
Operational and Facility Changes	• **Premises Changes:** Relocation, expansion, renovation, or closure of facilities
	• **Facility Modifications:** Changes to classrooms, learning spaces, or student amenities
	• **Timetabling Changes:** Significant modifications to class schedules or academic calendars
	• **Resource Allocation Changes:** Redistribution of budgets, equipment, or materials
Technology and Systems Changes	• **Learning Management System Changes:** Implementation or replacement of educational technology platforms
	• **Administrative System Changes:** New or upgraded systems for enrolment, records, finance, or HR
	• **IT Infrastructure Changes:** Network upgrades, hardware replacements, or security enhancements
	• **Digital Tool Adoption:** Introduction of new software, applications, or online resources

Partnership and External Relationship Changes	• **New Partnership Establishment:** Agreements with service providers, universities, or other organizations
	• **Partnership Modifications:** Changes to existing partnership terms, scope, or arrangements
	• **Partnership Termination:** Ending relationships with external partners
	• **Accreditation or Regulatory Changes:** Responses to new QQI requirements or regulatory obligations
Policy and Procedural Changes	• **Quality Assurance Changes:** Modifications to QA policies, procedures, or standards
	• **Student Services Changes:** Revisions to support services, complaint procedures, or student policies
	• **Compliance Changes:** Updates required by legal, regulatory, or accreditation changes

Change Assessment Criteria

All proposed changes must be assessed against the following criteria before approval:

Impact Assessment

Student Impact:	• How will the change affect current students' learning experience, outcomes, or satisfaction?
	• Will any students be disadvantaged or require additional support?
	• How will prospective students be affected?
Staff Impact:	• What changes to staff roles, workload, or responsibilities will occur?
	• What training or support will staff require?
	• Are staffing levels adequate for the change?
Operational Impact:	• How will the change affect day-to-day operations and workflows?
	• What resources (financial, physical, technological) are required?
	• Will the change affect other departments or processes?
Compliance Impact:	• Does the change affect QQI accreditation or regulatory compliance?
	• Are there legal or contractual implications?
	• Does the change align with organizational policies and standards?
Reputational Impact:	• How might the change affect ELI Schools' reputation with students, partners, or regulators?
	• What are the potential positive and negative perceptions?
Risk Assessment	All changes must undergo risk assessment using the framework established in the Risk Policy, including:
	• Identification of potential risks associated with the change
	• Assessment of likelihood and impact of identified risks
	• Development of risk mitigation strategies
	• Alignment with Risk Appetite Statement
	• Contingency planning for potential issues
	• Consideration of academic calendar and student cohort timing
	• Phased or pilot implementation where appropriate
	• Transition period planning and support

Change Approval Process

Change Request Submission   Any staff member may propose a change by submitting a formal Change Request to their Department Manager or designated Change Coordinator. The Change Request must include:
- Description of the proposed change and rationale
- Change Impact Assessment addressing all criteria in Section 5.2
- Risk Assessment and mitigation strategies
- Resource requirements and budget implications
- Proposed implementation timeline
- Stakeholder consultation plan
- Success criteria and evaluation methods

Initial Review   The Department Manager or Change Coordinator conducts an initial review to:
- Verify completeness of the Change Request
- Assess alignment with organizational strategy and priorities
- Identify any immediate concerns or barriers
- Determine the appropriate approval authority based on change significance

Approval Authority Levels   **Level 1 - Department Manager Approval:**
Minor changes with limited impact, including:
- Routine curriculum updates within existing program frameworks
- Minor timetabling adjustments
- Small-scale resource reallocations within approved budgets
- Procedural refinements that do not affect students or other departments

Level 2 - Senior Management Approval:
Moderate changes with broader impact, including:
- Significant curriculum revisions affecting learning outcomes
- New course or module introductions within existing programs
- Delivery mode changes for individual courses
- Technology implementations affecting multiple departments
- Partnership modifications
- Policy or procedure changes affecting students or staff
- Changes requiring budget allocation beyond departmental authority`

Level 3 - Executive Leadership/Board Approval:
Major changes with organization-wide impact, including:
- New program introductions or program discontinuations
- Organizational restructuring or management changes
- Major facility changes (relocation, expansion, closure)
- Significant financial commitments or strategic investments
- Changes affecting accreditation or regulatory status
- Major partnership establishments or terminations
- Changes to organizational mission, vision, or strategic direction

Consultation Requirements

Before approval, significant changes (Level 2 and 3) require consultation with affected stakeholders:

- **Student Consultation:** Surveys, focus groups, or student representative meetings for changes affecting learning experience
- **Staff Consultation:** Department meetings, staff forums, or individual consultations for changes affecting roles or workload
- **Partner Consultation:** Discussions with external partners for changes affecting partnerships or collaborative arrangements
- **Regulatory Consultation:** Communication with QQI or other regulatory bodies for changes affecting compliance or accreditation

Consultation feedback must be documented and considered in final decision-making. Where stakeholder concerns are not addressed, rationale must be provided.

Decision and Communication	Once a change is approved: • Decision is documented with rationale, conditions, and implementation requirements • Change sponsor and implementation team are designated • Communication plan is activated to inform all affected stakeholders • Implementation timeline and milestones are confirmed • Resources are allocated and responsibilities assigned

Change Implementation

Implementation Planning	The designated change sponsor develops a detailed implementation plan including: • Specific tasks, responsibilities, and deadlines • Resource allocation and budget management • Communication schedule and key messages • Training and support arrangements • Risk monitoring and mitigation activities • Quality assurance and evaluation methods
Stakeholder Communication	Throughout implementation: • Regular updates are provided to affected stakeholders • Communication channels remain open for questions and feedback • Concerns or issues are addressed promptly • Progress against milestones is reported to approval authorities
Training and Support	Where changes affect staff roles or require new skills: • Training needs are assessed and training programs developed • Adequate time and resources are provided for training • Ongoing support is available during transition periods • Performance is monitored and additional support provided as needed Where changes affect students: • Orientation or information sessions are provided • Written guidance and resources are made available • Student support services are briefed and prepared to assist • Feedback mechanisms are established to identify student concerns

Transition Management For changes requiring transition from old to new systems, processes, or arrangements:
- Transition period is clearly defined with start and end dates
- Parallel running or phased implementation is used where appropriate
- Contingency plans are in place for transition issues
- "Go-live" or cutover activities are carefully planned and communicated
- Post-implementation support is provided during stabilization period

Monitoring and Evaluation

Implementation Monitoring During implementation:
- Progress against plan is monitored regularly
- Issues or delays are identified and addressed promptly
- Risks are monitored and mitigation strategies adjusted as needed
- Stakeholder feedback is collected and acted upon
- Budget and resource utilization is tracked

Post-Implementation Review Within [3-6 months] of implementation completion, a formal review is conducted to:
- Assess whether change objectives were achieved
- Evaluate impact on students, staff, and operations
- Identify lessons learned and best practices
- Determine if adjustments or further changes are needed
- Document outcomes for organizational learning

Continuous Improvement Lessons learned from change implementation are:
- Documented and shared across the organization
- Incorporated into future change management processes
- Used to update this policy and related procedures
- Integrated into staff training and development programs

Crisis Management Framework

Types of Crises

ELI Schools recognizes the following categories of crisis situations requiring immediate response:

Facility and Safety Crises
- **Building Incidents:** Structural damage, safety hazards, or facility failures requiring evacuation or closure
- **Fire Emergencies:** Fire outbreaks, smoke incidents, or fire safety system failures
- **Flood or Water Damage:** Flooding, burst pipes, or water-related damage to facilities
- **Environmental Hazards:** Gas leaks, chemical spills, air quality issues, or other environmental dangers
- **Security Incidents:** Break-ins, vandalism, threats, or security breaches

Health and Welfare Crises
- **Pandemic or Public Health Emergency:** Disease outbreaks, public health orders, or widespread illness
- **Student Welfare Emergency:** Serious injury, illness, mental health crisis, or safeguarding concern involving students
- **Staff Welfare Emergency:** Serious injury, illness, or welfare concern involving staff members
- **Medical Emergency:** Immediate medical situations requiring emergency services

Operational Crises
- **IT System Failure:** Loss of critical technology systems, networks, or data
- **Cybersecurity Incident:** Cyber-attacks, ransomware, data breaches, or system compromises
- **Sudden Loss of Key Staff:** Unexpected departure, incapacitation, or loss of critical personnel
- **Service Provider Failure:** Sudden failure or termination of essential external services
- **Financial Crisis:** Severe financial difficulties threatening operational viability

External Crises
- **Natural Disasters:** Earthquakes, severe weather, or other natural events affecting operations
- **Government or Regulatory Intervention:** Sanctions, investigations, or enforcement actions by authorities
- **Reputational Crisis:** Significant negative publicity, social media crisis, or public relations emergency
- **Legal Crisis:** Major legal action, litigation, or regulatory violations

Crisis Identification and Escalation

Crisis Recognition

Any staff member who becomes aware of a potential crisis situation must immediately assess whether the situation meets crisis criteria:
- Does it pose immediate risk to student or staff safety?
- Does it threaten continuity of educational operations?
- Does it require urgent decision-making beyond normal authority levels?
- Could it result in significant harm, loss, or reputational damage?
- Does it require coordination across multiple departments or external agencies?

If any answer is "yes," the situation should be treated as a potential crisis and escalated immediately.

Immediate Escalation

Upon identifying a crisis:
1. **Ensure Immediate Safety:** Take any necessary immediate actions to protect people and property
2. **Contact Emergency Services:** Call emergency services (fire, police, ambulance) if required
3. **Notify Crisis Management Team:** Contact designated Crisis Management Team members immediately using emergency contact procedures
4. **Secure the Scene:** Prevent further harm or damage where safe to do so
5. **Document:** Note key facts, times, and actions taken

Emergency Contact Information:
- Crisis Management Team Leader: Peter Hutchinson, +353 857327349
- Deputy Crisis Leader: Vourneen McGeough, +353 86 833 5560
- 24/7 Emergency Line: ELI Emergency + 353 83 380 0558
- Emergency Services: 999 or 112

Crisis Management Team

Team Composition

The Crisis Management Team consists of:
- **Crisis Team Leader:** Managing Director, Peter Hutchinson
- - overall coordination and decision-making
- **Deputy Crisis Leader:** Senior Operations Manager
- **Academic Representative:** Senior Director of Studies - academic continuity and student learning
- **Operations Representative:** Operations Manager - facilities, logistics, and operational continuity
- **Student Services Representative:** Student Experience Manager - student welfare and support
- **Communications Representative:** Marketing Manager- internal and external communications
- **Finance Representative:** Finance Manager - financial implications and resource allocation
- **Legal/Compliance Advisor:** Senior Academic Manager - legal and regulatory matters

Additional members may be co-opted based on the nature of the crisis (e.g., IT Manager for technology crises, HR Manager for staff-related crises).

Team Activation

The Crisis Management Team is activated when:
- A crisis situation is identified and escalated
- The Crisis Team Leader or Deputy determines activation is necessary
- Multiple departments or external agencies need coordination
- Urgent decisions beyond normal authority are required

Activation procedures:
1. Crisis Team Leader or Deputy convenes the team (in-person or virtual)
2. Team assembles within [1-2 hours] of activation
3. Initial situation assessment and response planning conducted
4. Roles and immediate actions assigned
5. Communication protocols activated

Crisis Response Priorities

In all crisis situations, the Crisis Management Team follows this priority order:

Priority 1: Protect People
- Ensure immediate safety of students, staff, and visitors
- Provide emergency medical assistance if needed
- Evacuate or shelter in place as appropriate
- Account for all individuals and identify any missing persons
- Provide psychological first aid and emotional support

Priority 2: Contain and Stabilize
- Prevent crisis from escalating or spreading
- Secure facilities, systems, or information as needed
- Engage emergency services or external experts
- Implement immediate containment measures
- Establish command and control structure

Priority 3: Communicate
- Notify affected stakeholders promptly and accurately
- Provide clear instructions and guidance
- Establish regular communication updates
- Manage internal and external communications
- Coordinate with authorities and media as appropriate

Priority 4: Maintain Continuity
- Assess impact on educational operations
- Activate business continuity plans
- Implement alternative arrangements for teaching and learning
- Maintain essential administrative functions
- Support students to continue their studies

Priority 5: Investigate and Document
- Gather facts and evidence
- Document all actions and decisions
- Conduct root cause analysis
- Identify lessons learned
- Prepare reports for authorities or insurers

Priority 6: Recover and Resume
- Develop recovery plan with timelines
- Restore normal operations systematically
- Provide ongoing support to affected individuals
- Implement improvements based on lessons learned
- Conduct post-crisis review and evaluation

Communication Protocols During Crises

Internal Communication	**Students:** • Immediate notification via multiple channels (email, SMS, learning platform, social media) • Clear, factual information about the situation and any actions they need to take • Regular updates at defined intervals (e.g., every [2-4 hours] during active crisis) • Designated contact point for student questions and concerns • Information about support services available **Staff:** • Immediate notification to all staff via email, phone, or emergency notification system • Clear instructions about their roles and responsibilities during the crisis • Regular briefings and updates from Crisis Management Team • Guidance on communicating with students and external parties • Support resources for staff wellbeing
External Communication	**Parents/Guardians/Sponsors:** • Notification as soon as practicable after students are informed • Factual information about student safety and wellbeing • Contact information for further inquiries • Updates as situation evolves **Partners and Service Providers:** • Notification if crisis affects partnership arrangements or services • Information about any changes to operations or expectations • Coordination of joint response if appropriate **Regulatory Bodies (QQI, Government Agencies):** • Immediate notification if crisis affects compliance or accreditation • Regular updates as required by regulatory obligations • Cooperation with any investigations or inspections • Documentation of response and remedial actions **Media and Public:** • Designated spokesperson (typically Crisis Team Leader or Communications Representative) • Prepared statements with key facts and actions being taken • Proactive communication to prevent misinformation • Coordination with authorities on public messaging • Social media monitoring and response
Communication Principles	All crisis communications must be: • **Timely:** Provided as quickly as possible with regular updates • **Accurate:** Based on verified facts, avoiding speculation • **Clear:** Using plain language appropriate to the audience • **Consistent:** Coordinated across all channels and spokespersons • **Compassionate:** Acknowledging impact and showing concern for those affected • **Actionable:** Providing clear guidance on what recipients should do

Business Continuity Planning

Critical Functions

ELI Schools has identified the following critical functions that must be maintained or rapidly restored during crises:
- Student safety and welfare support
- Teaching and learning delivery (through alternative means if necessary)
- Student assessment and progression
- Student records and data protection
- Communication systems (internal and external)
- Financial operations (payroll, payments, banking)
- Regulatory compliance and reporting
- IT systems and data access

Continuity Strategies

For each critical function, continuity strategies include:
- **Alternative Delivery Methods:** Online learning platforms, remote teaching, alternative venues
- **Backup Systems:** Redundant IT systems, cloud-based backups, alternative communication channels
- **Alternative Staffing:** Cross-training, succession planning, external support arrangements
- **Alternative Facilities:** Agreements with other institutions, remote work capabilities, temporary spaces
- **Resource Stockpiles:** Emergency supplies, backup equipment, financial reserves

Recovery Time Objectives

Target timeframes for restoring critical functions:
- **Immediate (0-4 hours):** Student safety, emergency communications, crisis coordination
- **Short-term (4-24 hours):** Student welfare support, basic IT access, stakeholder communication
- **Medium-term (1-3 days):** Teaching delivery (alternative arrangements), student services, administrative functions
- **Long-term (3-7 days):** Full operational restoration, normal service levels, facility repairs

Continuity Plan Testing

Business continuity plans are:
- Reviewed annually and updated as needed
- Tested through tabletop exercises or simulations [annually]
- Evaluated after any crisis activation
- Integrated with staff training and induction programs

Post-Crisis Recovery and Review

Recovery Phase

Following crisis stabilization:
- Crisis Management Team develops detailed recovery plan
- Timelines and milestones for return to normal operations established
- Resources allocated for recovery activities
- Ongoing support provided to affected students and staff
- Regular monitoring of recovery progress

Post-Crisis Review

Within [2-4 weeks] of crisis resolution, a comprehensive review is conducted to:
- Document the crisis timeline, decisions, and actions taken
- Evaluate effectiveness of crisis response
- Identify what worked well and what could be improved
- Assess impact on students, staff, and operations

	• Determine if policy or procedure changes are needed
Lessons Learned	Findings from post-crisis reviews are: • Documented in a formal report to Senior Management • Shared with staff (appropriately) for organizational learning • Used to update crisis management procedures and continuity plans • Incorporated into staff training programs • Reported to QQI or other regulatory bodies as required • Integrated into risk management processes

Training And Awareness

Staff Training	All staff receive training on: • This Change and Crisis Management Policy and related procedures • How to submit Change Requests and participate in change implementation • How to recognize and escalate crisis situations • Emergency procedures and evacuation protocols • Their specific roles during crises • Business continuity arrangements for their areas Training is provided: • During staff induction for new employees • Annually as refresher training for all staff • When significant policy or procedure changes occur • Through crisis simulation exercises
Crisis Management Team Training	Crisis Management Team members receive specialized training on: • Crisis leadership and decision-making • Incident command systems • Crisis communication strategies • Business continuity management • Post-crisis reviews and learning
Student Awareness	Students are informed about: • How changes affecting their programs will be communicated • Emergency procedures and evacuation protocols • How to access support during changes or crises • How to provide feedback on changes Information is provided: • During student orientation • Through student handbooks and online resources

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Related legislation, regulation or guidelines:

• Safety, Health and Welfare at Work Act 2005
• Fire Services Acts 1981 and 2003
• Building Control Acts and Regulations
• Code of Practice for Provision of Programmes of English Language Education to International Learners