

Risk Management Strategy

Aspect of QA	Governance, Risk and Compliance
Policy Owner	Managing Director
Purpose	To establish a structured approach to identifying, assessing and managing risks that may affect the organisation.
Scope	This strategy applies to all operational, financial, academic and reputational risks within Swan ELT.
Related Policies	Financial Risk Management Strategy, Crisis Management Policy, Health & Safety Policy
Review Cycle	Annual

1. Policy Statement

Swan Training Institute is committed to proactive identification, assessment, mitigation and monitoring of risks that may impact student safety, academic quality, regulatory compliance, financial stability, reputation, and operational continuity.

2. Risk Governance Structure

Role	Responsibility
Director – Michael McGarry	Overall risk accountability
Compliance Manager – Dermot McSharry	TrustEd & regulatory monitoring
Academic Manager – Kristina Vaughan	Academic quality risk
Operations Manager – Helen Gao	Health & Safety oversight
Data Protection Lead – Helen Gao	GDPR risk management
Homestay Coordinator – Sarah Zoncada	Accommodation risk oversight

3. Risk Rating Matrix

Likelihood Scale: 1 (Rare) to 5 (Almost Certain)

Impact Scale: 1 (Minor) to 5 (Critical)

Risk Score = Likelihood x Impact

Score	Risk Level	Action Required
1–5	Low	Monitor
6–10	Medium	Mitigate
11–15	High	Immediate action
16–25	Critical	Escalate to Director

Safeguarding (Junior Programme)

Key Risks:

- Child protection allegation
- Missing student
- Inadequate supervision
- Unvetted staff/host family

Controls:

- Garda Vetting
- Safeguarding training
- Supervision ratios 1:25
- Incident reporting system

Residual Risk Level: Medium

Health & Safety

Key Risks:

- Fire
- Slip/trip injury
- Infectious illness
- Unsafe premises

Controls:

- Fire certification
- Annual fire drills
- First aid trained staff

- Accident log
- Premises risk assessments

Residual Risk Level: Low–Medium

Academic Quality

Key Risks:

- Poor teaching quality
- Inconsistent assessment
- Student dissatisfaction

Controls:

- Lesson observations
- Qualified teachers
- CPD programme
- Student feedback surveys

Residual Risk Level: Medium

Reputational Risk

Key Risks:

- Negative reviews
- Safeguarding publicity
- Agent complaints

Controls:

- Complaints procedure
- Rapid response protocol
- Media response policy
- Transparent communication

Residual Risk Level: Medium–High

Financial Risk

Key Risks:

- Low enrolment
- Cash flow disruption
- Refund liability

Controls:

- Budget forecasting
- Diversified recruitment markets
- Insurance coverage
- Director oversight

Residual Risk Level: Medium

(See further financial risk strategies in Due Diligence section)

Regulatory / TrustEd Compliance

Key Risks:

- Inspection failure
- Incomplete documentation
- Missed deadlines

Controls:

- Master Compliance Manual
- Internal audit schedule
- Policy review calendar

Residual Risk Level: Low–Medium

Data Protection (GDPR)

Key Risks:

- Data breach
- Lost devices
- Unauthorised access

Controls:

- Data Protection Lead appointed
- Secure cloud storage
- Data Retention Schedule
- Breach log

Residual Risk Level: Medium

Accommodation / Host Families

Key Risks:

- Safeguarding concern in homestay
- Poor living standards
- Unvetted residents

Controls:

- Garda vetting
- Annual inspections
- Homestay agreement
- Student feedback monitoring

Residual Risk Level: Medium

Excursions & Social Programme

Key Risks:

- Injury during trip
- Lost student
- Transport disruption

Controls:

- Pre-trip risk assessment
- Parental consent
- Head counts
- Emergency contact lists

Residual Risk Level: Medium

[\(Further risk assessment details for this category\)](#)

Operational Continuity / IT Systems

Key Risks:

- Cyber attack
- IT failure
- Loss of student records

Controls:

- Cloud backups
- Antivirus/firewall
- Business continuity plan
- Remote delivery capability

Residual Risk Level: Medium

Risk Management Overview

Stage	Responsible Person	Action
Risk Identification	Management Team	Identify operational, financial, academic, and reputational risks.
Risk Assessment	Senior Management	Assess likelihood and impact of identified risks.
Risk Mitigation	Responsible Managers	Implement measures to reduce or control risks.