

Department	Language in Action	Implementation Date	10 th June 2026
Official name of the policy	LiA Critical Incident Response Policy	Last Reviewed/Update Date	10 th June 2026
Policy Owner	Adam Ennis (Head of Juniors)	Approval Date	17 th June 2026
Policy Approver	Emiliano Sallustri (Managing Director ELT) & James Findley (Group COO)	Next Review	10 th June 2027

LiA Critical Incident Response Policy

1. Purpose

This policy provides guidance for the effective and coordinated response to critical incidents that may occur during Language in Action (“LiA”) programmes. It applies to all management and staff of Language in Action, as well as hosting providers and student agencies. The goal is to ensure the safety and welfare of all students, staff, and partners, while maintaining clear communication and accountability at every stage. This policy is an addendum to the Malvern International PLC (“Group”) Business Continuity Policy (“BCP”) and is consistent with the approach and escalation procedures as noted within this.

2. Incident Mitigation and Preparedness

Language in Action places strong emphasis on proactive preparedness to minimise risks and ensure readiness in the event of a critical incident.

2.1 Training and Awareness

- All staff undergo Safeguarding training prior to the start of the programme.
- All staff receive training on using the Emergency Plan of Action, as well as details of this Critical Incident Response policy.
- Staff maintain ongoing access to all relevant policies and training materials via the online training portal.

2.2 Data and Record Keeping

- Student emergency contact details, medical information, and consent forms are securely stored on internal drives by Malvern’s Admissions Team and are accessible by the Head Office.
- Relevant operational information (e.g. allergies, medical notes) is shared only with authorised centre management teams, in line with data protection and GDPR requirements.

2.3 CRT Pre-Programme Review

The Critical Response Team meets prior to the start of each summer programme to review policies, confirm procedures, and clarify designated roles to ensure readiness and understanding.

3. Definition of a Critical Incident

Critical incidents are defined as events that exhibit one or more of the following characteristics:

- Sudden and unexpected: Occurs without warning and outside the normal range of experience.
- Traumatic: Involves serious injury, death, or significant damage.
- Overwhelms coping mechanisms: Exceeds the capacity of individuals or the organisation to manage using normal strategies.
- Distressing: Causes significant emotional or psychological distress, immediate or long-term.
- Significant impact: Profoundly affects the health, thoughts, or behaviour of those involved.
- Disruptive: Threatens safety, well-being, or organisational functioning.

4. Critical Incident Identification and Escalation

All staff members, stakeholders, and providers must report any incident to the Centre Management Team, who will determine the appropriate course of action. If an incident displays any of the above characteristics, it must be escalated

immediately through the management chain. At any stage from the Programme Manager onwards, a Critical Incident can be declared, activating this policy.

Escalation Chain:

- Coordinator – Specialist Safeguarding (cover for Centre Manager and DDSL)
- Centre Manager – Centre DDSL
- Programme Manager – Cluster Manager (Language in Action)
- LiA HO Co-Lead
- Head of Juniors
- Managing Director of ELT & Malvern International PLC COO

This chain acts within the BCP. As such, incidents that meet the threshold for the BCP's 60-minute and 24-hour alert levels are simultaneously escalated through these channels. These triggers are defined as below:

60-Min Alert — alert a member of this team, follow-up email to MI60MIN@Malvernplc.com within 60 minutes of notification of event	24-HR Alert — alert via MI24HRS@Malvernplc.com within 24 hours of the event
The death of any student or employee	Notices or routine inquiries from Regulatory Bodies (i.e. Home Office, Council, PREVENT)
Any event that results in serious injury or harm to any person or the threat of e.g. bomb threat	Solicitor letters of contact or threats to contact a solicitor
Extensive damage to property	Non-life-threatening employee medical issue resulting in the calling of the emergency services
Serious Safeguarding concerns	Significant employee HR issue and/or compliance concerns
Serious PREVENT concerns	Pandemics or emergencies affecting other Sites
Any event that results in loss of operational ability onsite e.g. fire, server failure, flood	Media inquiry/Event
Aggressive social media attack	Non-routine regulatory agency visit (i.e. UKVI; local Council; Health & Safety Executive, ISI, British Council, PREVENT team etc.)
Unplanned law enforcement visit	Imminent threat of protesters or demonstrators

If the Critical Incident is related to student safeguarding, then the incident must also be logged with the Group Safeguarding and Prevent Coordinator, Giulia Mella, via the Group's central safeguarding inbox – safeguarding@malvernplc.com. As per Annex G of the Group Safeguarding & Prevent Policy, safeguarding escalation goes directly from Centre Manager to LiA DSL (Emiliano Sallustri) and then to the Group Coordinator. If the safeguarding incident also triggers the CIR, then other parts of the chain are informed as per their roles within this structure.

If the Critical Incident is related to health and safety, then the incident must also be logged with the Group Health & Safety Coordinator, Matthew Huda, via the Group's central H&S inbox – HSE@malvernplc.com. Where a critical incident involves serious injury, a dangerous occurrence, or a fatality, statutory reporting obligations under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) may be triggered. Assessment of RIDDOR obligations is the responsibility of the Group H&S Coordinator, Matthew Huda, and is conducted in parallel with the CRT response.

Where a safeguarding allegation meets the harm threshold, the LADO (Local Authority Designated Officer) must be contacted within one working day, in accordance with KCSIE 2025 and the Group Safeguarding & Prevent Policy. Responsibility for LADO contact sits with Emiliano Sallustri as CRT Lead and the LiA DSL, in coordination with the Group Safeguarding Coordinator, Giulia Mella. Staff should refer to Annex G of the Group Safeguarding & Prevent Policy for the full reporting guide.

5. Immediate Response Procedures

When a critical incident occurs, the following steps must be taken without delay:

- Ensure safety: Protect all persons involved from immediate harm.
- Contact emergency services: Police, ambulance, or fire as appropriate.
- Notify Senior Management: Report the incident and actions taken.
- Preserve evidence: Keep records of what happened, who was involved, and when.
- Document actions: Log all communications, timings, and decisions.
- Activate CRT: The Programme Manager notifies the CRT and logs the critical incident using the appropriate 60-minute or 24-hour alert email address (and additional Safeguarding and Health & Safety Group inboxes as required).
- Communicate clearly: Ensure information shared is factual, concise, and consistent.

For any incident involving potential loss, damage, or liability, the Group's insurance broker (Howdens, contact: Laura Penny) must be notified within 24 hours, with an initial loss assessment provided within 12 hours where applicable. Responsibility for initiating this sits with the COO in line with the BCP.

6. LiA Critical Response Team (CRT) Formation

Upon declaration of a critical incident, a designated Critical Response Team is activated. The LiA CRT is available 24 hours per day during the programme, either in person or remotely. Contact details for all CRT members are held by the Head Office Team and available to all centre management teams.

LiA CRT for the 2026 Programme:

- Beatrice Bellina – Senior Operations Manager, Language in Action
- Daniele Pluchino – Deputy Head of Juniors
- Adam Ennis – Head of Juniors, Language in Action
- Emiliano Sallustri – Managing Director ELT & LiA DSL
- James Findley – COO, Malvern International PLC

The LiA CRT is led by Emiliano Sallustri, who ensures coordination and oversight across all areas of response. At Malvern International group level, James Findley is the Group Crisis Lead and BCP lead. As such, any incident that would meet the Malvern International group-level BCP 60-minute and 24-hour thresholds would immediately escalate at group level as well, with the response between the local operation and the wider group coordinated between Emiliano Sallustri and James Findley.

7. Critical Response Team Responsibilities

The LiA CRT will manage all aspects of the response, including coordination of people, communications, welfare, and post-incident review. They are responsible for ensuring a calm, effective, and well-documented response from the onset of the incident through to recovery.

Individual Responsibilities:

- Beatrice Bellina: Managing staff response and supervision, ensuring all staff receive accurate, timely information, and coordinating safe relocation if required.
- Daniele Pluchino: Communicating with Group Leaders, Agencies, and Parents/Guardians, and coordinating translations with Regional Sales Managers.
- Adam Ennis: Liaising with hosting providers and Emergency Services, ensuring consistent communication.
- Emiliano Sallustri: Leading the LiA CRT and managing communication with shareholders, press, and the wider company. Managing communication with the British Council, local councils, and regulatory bodies (e.g. LADO), and updating Malvern SLT.
- James Findley: Group Crisis Lead; coordinates immediate and ongoing responses as required in line with the Malvern BCP.

8. Communication Principles

All communication during a critical incident must adhere to the following principles:

- Accuracy: Confirm facts before release.
- Consistency: All messaging aligns with CRT guidance.
- Confidentiality: Respect privacy and data protection laws.

- Empathy: Communicate with sensitivity to those affected.
- Authority: Only authorised representatives may speak externally.

9. Media and Social Media Protocol

- Only the Managing Director ELT, COO or delegated CRT member may communicate with media outlets.
- Staff are prohibited from posting or commenting on social media regarding any incident.
- All external enquiries must be redirected to the CRT Lead.
- Internal messaging must remain professional, factual, and confidential.

10. Post-Incident Review and Support

The CRT will meet following any incident to produce a detailed report on response management and outcomes. Reports are securely stored for a minimum of seven years — or until the student reaches the age of 25 where an under-18 is involved, in line with safeguarding retention standards — accessible only to CRT members, and all documentation must comply with data protection and confidentiality standards.

The CRT will assess the welfare and psychological needs of all parties directly or indirectly affected and provide relevant support, which may include:

- Access to counselling or debriefing for affected staff or students.
- Time off or adjusted duties for those impacted.
- A formal debrief meeting to reflect and raise concerns.

11. Review and Continuous Improvement

This policy is reviewed annually or following any critical incident. The CRT will assess effectiveness and incorporate lessons learned into revised procedures and training. Updates are communicated to all staff and stakeholders to ensure continuous improvement.