



Changing lives through learning

Provider Approval

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Purpose

This policy defines Open Awards' approach to the approval of organisations (“providers”) to deliver its qualifications, units, and accredited courses/programmes.

The policy establishes a consistent, risk-based, and proportionate framework for provider approval, ensuring that only organisations with the necessary legal standing, capability, governance, resources credibility and reputation are approved.

This policy supports Open Awards to:

- Protect the interests of learners¹ and apprentices
- Maintain the validity and integrity of its qualifications
- Uphold public confidence
- Meet its regulatory obligations.

Risk Appetite Statement

Open Awards adopts a low risk appetite in relation to provider approval where there is potential impact on:

- Learner and apprentice interests and outcomes
- Qualification standards and assessment integrity
- Regulatory compliance
- Organisational reputation.

Open Awards has very low tolerance for:

- Weak or unverifiable legal identity
- Inadequate safeguarding arrangements
- Evidence of malpractice, maladministration, or regulatory non-compliance
- Financial instability that may impact delivery or learner protection.

Open Awards may accept managed and mitigated risk where:

- Risks are clearly identified, assessed and appropriately mitigated, and where the residual risk is proportionate and manageable.
- Appropriate conditions, monitoring, or restrictions can be applied.

All approval decisions are informed by the potential for an Adverse Effect, including risks to learners, qualification standards, and regulatory compliance. Approval decisions will always be guided by whether identified risks can be effectively mitigated without compromising regulatory compliance or learner protection.

¹ In this policy, the term ‘learner’ includes apprentices and anyone registered on an Open Awards product or service

Scope

This document is applicable to the following Open Awards products:

Ofqual and Qualifications Wales (QW) regulated qualifications, units, and apprenticeship assessments	<input checked="" type="checkbox"/>
Access to HE Diplomas (Quality Assurance Agency (QAA))	<input checked="" type="checkbox"/>
Quality Endorsed Courses	<input checked="" type="checkbox"/>
Badge of Excellence	<input checked="" type="checkbox"/>
Micro-credentials Courses	<input checked="" type="checkbox"/>

It applies to:

- Initial provider approval
- Expansion of provision or delivery model
- Changes in legal status, ownership, or control
- Ongoing monitoring and review.

Audience

This policy applies to:

- Open Awards staff involved in provider approval, quality assurance, and risk assessment
- Prospective and approved providers.

Definition[s]

Provider	An organisation approved by Open Awards to deliver qualifications, courses, or services.
Approval	Formal recognition granted by Open Awards permitting delivery of specified provision under defined conditions.
Delivery Site	A physical or virtual location from which approved provision is delivered.
Risk-based Approach	A structured approach to decision-making informed by assessment of potential risks to compliance, quality, and learners.
KYC (Know Your Customer)	Due diligence processes undertaken to verify legal identity, ownership, and legitimacy of an organisation.
Adverse Effect	Any act, omission, event, or circumstance that may prejudice learners, affect qualification standards, or impact regulatory compliance.

Policy

Open Awards operates a risk-based, evidence-informed provider approval model.

Approval will only be granted where Open Awards is satisfied, based on sufficient and appropriate evidence, that an organisation has the capacity, capability, resources, and governance arrangements to deliver provision in a compliant, high-quality, and sustainable manner.

Approval is granted to a clearly defined legal entity, which retains full and non-transferable accountability for all aspects of delivery, quality assurance, and compliance.

Legal Identity and KYC

Open Awards requires all providers to be identifiable as legitimate legal entities. Applications must be made in the organisation's legal name, with any trading names recorded for transparency.

Due diligence includes, as a minimum:

- Verification of legal registration (e.g. Companies House, Charity Commission)
- Review of ownership and control structures
- Assessment of governance arrangements.

Approval will not be granted where legal identity cannot be verified or where ownership structures lack transparency.

Regulatory and Legal Compliance

Providers must demonstrate the ability to comply fully with all relevant regulatory and legal requirements as relevant to their curriculum, including those of Ofqual, QW, and QAA.

Providers must operate in a manner that does not place Open Awards at risk of regulatory breach or reputational harm, and must ensure that all relevant staff understand and adhere to applicable requirements.

Financial Viability and Sustainability

Open Awards requires assurance that providers are a going concern, financially viable and capable of sustaining delivery.

Financial due diligence may include, as appropriate:

- Review of financial accounts
- Credit checks
- Funding arrangements.

Where financial risk is identified, Open Awards may impose conditions, enhanced monitoring, or decline approval where risks cannot be adequately mitigated.

Approval will not be granted where financial risks cannot be adequately mitigated.

Quality of Education and Training

Providers must demonstrate that they have the capability to deliver high-quality education and training. This includes:

- Relevant sector expertise
- Qualified and competent staff
- Effective internal quality assurance arrangements
- The ability to support positive learner outcomes.

Governance and Accountability

Providers must have appropriate governance and leadership arrangements in place, with clearly defined roles and responsibilities.

Open Awards will consider organisational structure, leadership capability, and any previous regulatory or awarding organisation history in assessing suitability.

Safeguarding and Learner Protection

Safeguarding is a mandatory requirement for approval. Providers must demonstrate appropriate safeguarding arrangements, including safer recruitment practices and designated safeguarding responsibilities.

Approval will not be granted where safeguarding arrangements are insufficient.

Health, Safety and Wellbeing

Providers must ensure safe environments for learners and staff, supported by appropriate health and safety policies, procedures, and risk assessments.

External indicators may be considered as part of due diligence.

Policies, Procedures and Operational Readiness

Providers must demonstrate that appropriate policies and procedures are in place to support compliant delivery. These include safeguarding, complaints, appeals, malpractice, equality and diversity, data protection, and quality assurance.

The full list of policies and procedures required is reviewed on at least an annual basis and communicated to providers through the provider approval application form.

Insurance and Employer Compliance

Providers must hold appropriate insurance, including employer's liability, public liability, and professional indemnity insurance, and comply with relevant employment legislation.

Resources and Capacity

Providers must demonstrate that they have sufficient staffing, infrastructure, and systems to deliver provision effectively and in line with Open Awards requirements.

Risk-based Assessment

All approval decisions are informed by a structured risk assessment, taking into account organisational maturity, financial position, delivery model, and regulatory history.

Risk assessment outcomes determine approval decisions, conditions, and monitoring requirements.

Following assessment, Open Awards may:

- Approve
- Approve with conditions
- Defer
- Decline.

Approval must not and cannot be assumed and depends on meeting all requirements.

Provider Responsibilities

Approved providers are responsible for maintaining compliance with Open Awards requirements and regulatory conditions on an ongoing basis. This includes ensuring the accuracy of information, maintaining effective quality assurance systems, managing risks (including those arising from third parties), and protecting learner interests.

Transparency and Accuracy

Providers must ensure that all information provided is accurate, complete, and current. Providers are required to notify Open Awards of any material changes to their organisation. This includes any changes to relationships with third parties where an organisational conflict of interest may or does arise”.

Learner Interest and Public Confidence

Open Awards places the protection of learners and the maintenance of public confidence at the provider at the centre of all approval decisions. Providers must demonstrate the ability to deliver valid, reliable, and fair assessment.

Open Awards will only approve providers where it is satisfied, based on available evidence, that the organisation has the capacity, capability, and governance arrangements to deliver provision in a compliant, high-quality, and sustainable manner.

Third-party Arrangements

Providers must ensure that all delivery, including that undertaken by third parties, remains fully compliant with Open Awards requirements, and that accountability for quality and compliance is not delegated.

These responsibilities are formalised within the Provider Agreement

Failure to meet ongoing requirements may result in the application of sanctions in line with Open Awards’ Sanctions Policy.

Changes in Circumstances

Providers must notify Open Awards of any material changes, including, but not limited to:

- Change of ownership or control
- Changes to governance or leadership
- Expansion to new delivery sites
- Changes to delivery model
- Actual or perceived conflicts of interest at organisational level.

Such changes may trigger:

- Re-assessment of risk
- Variation of approval conditions
- Suspension or withdrawal of approval.

Guidance for Implementation

Open Awards operates a structured, risk-based provider approval process, ensuring that all approval decisions are consistent, evidence-based, and auditable.

There are full written procedures in place for the provider approval process. The process is managed and recorded via a Quartz workflow.

Overview of Approval Process

Provider approval will typically follow the stages below:

1. **Initial Enquiry and Pre-Screening**

Initial due diligence is undertaken to establish whether the organisation meets minimum eligibility criteria, including verification of legal identity, organisational existence, and basic risk indicators.

2. **Application Submission**

Providers must submit a completed application form supported by required documentation, including policies, procedures, and evidence of capability.

3. **Due Diligence and Risk Assessment**

A structured review is conducted, including:

- Legal and Know-your-customer (KYC) checks
- Financial assessment
- Quality and delivery capability
- Regulatory and sanctions history
- Review of policies and procedures.

A risk rating (e.g. low, medium, high) is assigned based on defined criteria.

4. **Clarification and Further Evidence (where required)**

Additional information may be requested where risks are identified or evidence is incomplete.

5. **Approval Decision**

Approval decisions are made at an appropriate level of authority, informed by risk rating and evidence:

- High Risk – Senior Management Team Approval
- Medium Risk – Director of Business and Development Approval
- Low Risk – Business Development Manager Approval

6. **Conditions and Onboarding**

Where applicable, conditions of approval are applied and must be met within defined timescales.

Risk-Based Decision-Making

Approval decisions are not binary and will reflect the level of risk identified.

Open Awards may:

- Approve without conditions (low risk)
- Approve with conditions (manageable risk)
- Defer pending further evidence
- Reject where risks are unacceptable or cannot be mitigated.

Conditions may include (but are not limited to):

- Restrictions on learner numbers
- Restrictions on delivery sites or qualification types
- Mandatory actions (e.g. policy development, staffing requirements)
- Enhanced monitoring or early quality assurance activity.

Where there is uncertainty, escalation must occur to ensure consistency and defensibility of decisions.

Evidence and Documentation Requirements

All approval decisions must be:

- Supported by documented evidence
- Recorded within Open Awards systems
- Capable of being audited.

This includes:

- Completed application documentation
- Risk assessment records
- Notes of any meetings or clarification discussions
- Rationale for approval decisions, including conditions.

Ongoing Monitoring and Review

Approval is not a one-time decision. Providers are subject to ongoing monitoring, which may include:

- Quality assurance activity
- Risk review
- Compliance checks.

Where concerns arise, Open Awards may:

- Apply sanctions
- Impose additional conditions
- Suspend or withdraw approval.

Specific Delivery Models and Risk Scenarios

Open Awards recognises a range of delivery models and will apply additional scrutiny where these introduce increased risk.

This includes, but is not limited to:

- Subcontracting and third-party delivery arrangements
- Franchise or partner delivery models
- Employer delivery
- Consortium arrangements
- Multi-site delivery.

In all cases, the approved provider retains full accountability for delivery and compliance. All delivery sites and third parties must be declared and approved in advance.

Approval decisions consider:

- Governance structure
- Quality assurance arrangements
- Consistency across sites
- Safeguarding and staffing
- Financial and operational risk.

Accountability must remain clearly defined, and Open Awards must be able to monitor delivery and manage risk at both organisational and site level.

Enhanced due diligence will be applied in higher-risk scenarios, including, but not limited to:

- New or start-up organisations
- Providers with adverse regulatory history
- International delivery
- Online or remote delivery
- High-risk qualification types
- Delivery in high-risk environments.

Providers must also ensure that any use of third-party systems or technology platforms complies with data protection and security requirements.

Multi-Academy Trusts and Group Structures

Where providers operate within group structures or Multi-Academy Trusts (MAT), Open Awards will determine the appropriate approval model based on legal accountability, governance arrangements, and delivery structures.

- The trust or parent company (as the legal entity) with individual schools/sites recorded as delivery sites, or
- An individual school, where autonomy and delivery arrangements differ.

Approval may be granted to a defined legal entity, either:

a) Trust-Level Approval

- MAT/parent company approved as provider
- Schools/sites recorded as delivery sites
- Central accountability required.

b) Individual School Approval

- Schools approved separately
- Independent compliance required.

c) Hybrid / Phased Approval

- Selected schools approved initially
- Expansion subject to further due diligence.

Subcontracting and Third-Party Delivery

Where a provider proposes to subcontract or engage third parties in the delivery, assessment, or quality assurance of Open Awards provision, Open Awards will assess the arrangement (including any actual or perceived conflicts of interest) based on accountability, control, and risk.

Approval will be granted only where:

- The approved provider remains the contracted legal entity; and
- Full accountability for compliance, quality, and learner outcomes is clearly retained.

Open Awards will require:

- All subcontracting arrangements to be declared and approved in advance
- Evidence that the provider has appropriate oversight, control, and quality assurance mechanisms in place.

In this model:

- Accountability is non-transferable and remains with the approved provider
- Open Awards reserves the right to:
 - Approve or reject subcontracting arrangements
 - Apply conditions or restrictions

Require cessation of arrangements where risk cannot be mitigated. In this instance, arrangements will be put in place to mitigate any adverse effect on learners.

Franchise or Partner Delivery Models

Where delivery is undertaken through franchise, partnership, or similar arrangements, Open Awards will assess whether the model provides sufficient transparency, control, and accountability.

Approval will only be granted where:

- The identity of the delivering organisation is clear and transparent to learners and stakeholders; and
- Responsibility for delivery, quality assurance, and compliance is clearly defined

Open Awards will not approve:

- “White-label” arrangements where the delivering organisation is not visible or identifiable
- Models where accountability for quality and compliance is unclear..

In all cases:

- The approved provider retains full accountability
- Marketing and communications must not mislead learners regarding the nature of the provision.

Employers Delivering to Workforce

Where an employer seeks approval to deliver provision to its own workforce, Open Awards will assess the model with particular consideration of independence, objectivity, and conflicts of interest.

Approval will be granted only where:

- Assessment decisions can be made independently and objectively; and
- Conflicts of interest are identified, documented, and effectively managed.

Open Awards may require:

- Separation of roles (e.g. line management vs assessment)
- Additional quality assurance controls.

In this model:

- The employer must demonstrate that delivery and assessment practices maintain the integrity and credibility of qualifications.

New or Start-Up Organisations

Where an organisation is newly established or has limited operational history, Open Awards will apply enhanced due diligence to assess capability, capacity, and risk.

Approval may be granted where:

- Sufficient evidence of capability and planning is provided; and
- Risks can be appropriately mitigated.

Open Awards may apply:

- Conditional or phased approval
- Restrictions on learner numbers or scope of delivery
- Enhanced monitoring and support.

Approval will not be granted where there is insufficient evidence that risks can be effectively managed.

Providers with Adverse History

Where a provider has a history of sanctions, regulatory action, or other adverse findings, Open Awards will undertake a detailed assessment of risk and remediation.

Approval will only be granted where:

- The provider demonstrates that issues have been appropriately addressed; and
- There is sufficient confidence in future compliance.

Open Awards may:

- Refuse approval
- Apply conditions or restrictions
- Implement enhanced monitoring.

International Delivery

Open Awards has an international delivery policy that details its approach in detail.

Where provision is delivered outside the UK, Open Awards will assess additional risks relating to legal context, regulatory alignment, and quality assurance.

Approval will be granted only where:

- The provider can demonstrate the ability to meet any relevant UK regulatory requirements; and
- Effective oversight and quality assurance can be maintained.

Open Awards may require:

- Additional due diligence
- Evidence of local compliance
- Additional controls or restrictions.

Approval will not be granted where oversight or compliance cannot be assured.

Online and Remote Delivery

Where provision is delivered wholly or partially online, Open Awards will assess risks relating to assessment security, learner identity, and system integrity.

Approval will be granted only where the provider can demonstrate:

- Robust learner identity verification processes
- Secure assessment arrangements
- Appropriate cyber security controls.

Open Awards may:

- Require specific systems or controls
- Request to review the platform and learning materials being used
- Apply additional monitoring.

Consortium Arrangements

Where delivery is undertaken through a consortium of organisations, Open Awards will require a clearly defined and accountable structure.

Approval will be granted only where:

- One organisation is identified as the approved provider and accountable legal entity; and
- All consortium partners are declared and subject to risk assessment.

In this model:

- The approved provider retains full accountability
- Roles and responsibilities must be clearly documented.

Multiple Sites and Satellite Locations

Where a provider operates across multiple sites, Open Awards will assess the provider's ability to maintain consistent quality and oversight.

Approval will be granted to a defined legal entity, with individual locations recorded as delivery sites.

In this model:

- All delivery sites must be declared and approved prior to delivery
- Open Awards may:
 - Restrict approval to specific sites
 - Require site-specific monitoring.

Providers must demonstrate the ability to maintain consistent standards across all delivery sites.

High-Risk Qualification Types

Where provision relates to qualifications subject to additional regulatory requirements, Open Awards will apply enhanced scrutiny through the qualification approval process. This includes pre-verification.

Where concerns are identified at provider approval stage, the pre-verification stage of the qualification approval process may be completed concurrently.

Approval will be granted only where:

- The provider demonstrates the specific capability required; and
- All qualification-level regulatory requirements can be met.

Open Awards may:

- Restrict approval to specific qualifications
- Apply phased or conditional approval.

Conflicts of Interest

Open Awards requires all providers to identify, document, and manage conflicts of interest at both individual and organisational levels.

Approval will only be granted where:

- Conflicts are appropriately controlled and do not compromise assessment integrity.

Approval may be refused where conflicts cannot be effectively mitigated.

High-Risk Delivery Environments

Where provision is delivered in higher-risk environments (e.g. custodial settings or with vulnerable learners), Open Awards will apply enhanced scrutiny.

Approval will be granted only where:

- Appropriate safeguarding and risk management arrangements are in place.

Additional controls and monitoring may be required.

Use of Technology and Platforms

Where providers utilise third-party systems or digital platforms, Open Awards will assess compliance with data protection, security, and operational requirements.

Approval will be granted only where:

- Systems are secure and compliant with relevant legislation
- There are appropriate back-up/ contingency plans
- The provider retains full responsibility for their use.

Responsibility

Overall responsibility for this policy rests with Open Awards' senior leadership team. Responsibility for implementation lies with teams responsible for provider approval, quality assurance, and risk management.

Review arrangements

This document will be reviewed, normally on an annual basis, as part of Open Awards' self-evaluation arrangements, or as a result of regulatory changes or identified good practice.

Related Policies

- Provider Agreement
- Sanctions Policy
- Malpractice and Maladministration Policy
- Risk Management Policy
- Safeguarding Policy

<i>Originator:</i>	<i>Nina Hinton</i>
<i>Date of latest review:</i>	<i>8th May 2026</i>
<i>Date of last approval:</i>	<i>21st April 2026</i>
<i>Approved by:</i>	<i>SMT</i>
<i>Review interval:</i>	<i>12 months</i>
<i>Next review due by:</i>	<i>30th April 2027</i>