



Due Diligence Policy and Procedure for Centre Seeking ProQual Approval

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1. Introduction

ProQual is dedicated to maintaining the highest standards of integrity, compliance, and quality across all centres that seek approval to deliver our qualifications. As part of this commitment, we have implemented a comprehensive due diligence process for assessing the suitability of prospective centres.

This process includes Company's House and creditsafe risk score checks, intelligence gathering through third-party notifications as outlined under Ofqual's General Conditions of Recognition, particularly Condition A8.7(b), searches through the ProQual Platinum System (PPS) to identify potential conflicts of interest, and website searches.

By conducting thorough due diligence checks, we ensure that only centres with the required professional standards, transparency, and integrity are granted approval.

This policy provides a structured approach to completing these checks, ensuring consistency, fairness, and compliance throughout the pre-approval process before the centre progresses to desktop approval. This comprehensive approach minimises risk, safeguards the integrity of our qualifications, and upholds the high standards ProQual sets for all its centres.

2. Company's House Searches- Directors and People with Significant Control

ProQual begins by identifying current and past directors, as well as individuals with significant control within the prospective centre. This includes assessing their involvement in other businesses and evaluating the success and financial health of those entities.

Procedure:

- Risk Officer will identify current and past directors and individuals with significant control.
- Assess their involvement in other businesses, including the success and financial health of those businesses.
- Evaluate patterns of director behaviour, such as frequent changes in directorships or involvement in dissolved companies.

3. Organisation Website Check

ProQual will review the organisation's website to understand its core values, mission, and vision. This step is crucial in determining whether the centre's values align with ProQual's standards and requirements. We also identify the sector in which the organisation operates to ensure it is appropriate for the qualifications they seek to deliver. In addition, we check which other awarding bodies the organisation is affiliated with, providing further insight into its credibility and standing within the vocational training sector.

Procedure:

- Risk Officer will review the organisation's website to understand its core values, mission, and vision.
- Determine the sector in which the organisation operates and ensure alignment with ProQual's standards and requirements.
- Identify which other awarding bodies the organisation is affiliated with to assess its credibility and reputation.

4. Credit Score and Financial Health Check

ProQual conducts financial health checks, including reviewing company creditsafe risk scores. This ensures that the organisation has sufficient resources for the delivery and assessment of ProQual qualifications. Verifying the financial stability and sustainability of the organisation is essential to minimise risks associated with approval.

Procedure:

- Risk Officer will conduct financial health checks, including creditsafe risk scores to ensure the organisation has sufficient resources for the delivery and assessment of ProQual qualifications.
- Verify the financial stability and sustainability of the organisation to minimise risks associated with approval.

5. Intelligence Gathering: Notifications from Third Parties (A8.7(b) Notices)

ProQual maintains a proactive approach to monitoring intelligence received from third parties. As part of this process, we review notifications or concerns raised by other awarding bodies, regulatory bodies, or stakeholders, as outlined in Condition

A8.7(b) of Ofqual's General Conditions of Recognition. This is essential for ensuring that ProQual is aware of any potential issues related to a centre's operations, particularly those that may not be visible through standard checks.

Procedure:

- ProQual's Risk Officer will monitor and review any notifications or alerts received about prospective centres from third parties. These could include reports of malpractice, operational failures, or other regulatory concerns.
- All third-party notifications will be stored securely in ProQual's centralised intelligence database and logged on the ProQual Platinum System (PPS). This ensures that the information is accessible for future reference and can be cross-referenced against other data if the centre requests approval again.
- Each time a centre applies for approval, the Risk Officer will revisit any previous intelligence gathered to assess whether new information has emerged that may affect the centre's suitability.
- If significant concerns are identified from third-party reports, these will be escalated to the Head of Compliance who will consider them in the overall risk assessment.

6. Searches on ProQual Platinum System (PPS)

To further enhance our due diligence process, ProQual's Risk Officer will perform targeted searches on PPS to identify any potential conflicts of interest related to the directors, assessors, internal quality assurers (IQAs), and other key individuals associated with the prospective centre. These checks ensure transparency and help manage any potential conflicts that may arise from previous or current associations with other approved centres.

Procedure:

- The Risk Officer will search the PPS to identify if any individuals associated with the prospective centre have worked with ProQual in the past or are currently engaged with ProQual in another capacity. This includes, but is not limited to searching for:
 - Individuals who are or have been key personnel of other centres approved by ProQual.
 - Assessors or IQAs currently working with or previously involved with other approved centres.
 - External Quality Assurers (EQAs) working for ProQual or having any associations with the prospective centre.

- Any potential conflicts of interest identified during these searches will be carefully assessed to ensure that they do not undermine the integrity of the centre's application or ProQual's assessment processes.
- If conflicts are identified, ProQual will determine the appropriate mitigation steps, which may include additional scrutiny of the application or requests for disclosure of relevant information from the individuals involved.

7. Identifying and Managing Conflicts of Interest

As part of the due diligence process, ProQual is committed to identifying and managing any conflicts of interest that may arise. These conflicts could stem from personal or professional relationships between the individuals involved in the prospective centre and those engaged with ProQual in other capacities (e.g., assessors, IQAs, or EQAs). Ensuring transparency and managing potential conflicts is vital to maintaining the fairness and integrity of the qualification process.

Procedure:

- The Risk Officer will assess whether any individuals in the prospective centre (including directors, assessors, and IQAs) have any known associations or previous affiliations with other centres already approved by ProQual or if they are engaged with ProQual in another role, such as associate EQAs.
- If any potential conflicts are identified, ProQual will review the situation and determine the most appropriate course of action. This may include asking the prospective centre to disclose full details of the relationships or taking steps to mitigate any potential bias or influence.

8. Social Media Searches

ProQual may conduct social media searches on organisations and key centre staff when deemed appropriate and proportionate. These checks help verify identity, confirm the accuracy of information provided, and ensure consistency with official records such as Companies House. These checks also support ProQual's commitment to integrity and transparency by assessing whether the centre and its personnel demonstrate alignment with ProQual's core values, safeguarding the credibility of the approval and assessment process.

9. Review and Final Decision

Once all checks are complete, the Risk Officer prepares a detailed report of the findings and sends it to the Principal Business Operations Officer, who reviews the

information and decides whether to recommend moving the application to the next stage.

If the recommendation is not to proceed, the Operations Officer will inform the prospective centre of the outcome. Centres with unresolved issues, significant concerns, or conflicts that cannot be satisfactorily addressed will not progress to desktop approval.

All records are securely stored on PPS and the intelligence database for reference in future applications.

Because these checks involve sensitive information, ProQual does not share detailed findings or the specific reasons behind a decision not to progress to the next stage.

10. Due Diligence Checks Post Approval

If an approved centre later changes key personnel—such as Directors, individuals with significant control, IQAs, or assessors—and submits a Notification of Changes Form, or decides to open a satellite site, ProQual will again carry out due diligence checks to ensure continued compliance with approval requirements and maintain the integrity of the centre's operations.

11. Confidentiality and Data Protection

All information collected during the due diligence process will be handled in compliance with data protection regulations (e.g., GDPR). This information will be used for the purpose of evaluating the suitability of prospective centres.

Additionally, the information on the intelligence database is also used for assisting in evaluating the suitability of individuals who join a previously approved centre to deliver ProQual qualifications. The information can be used by ProQual to affect and add merit to any ProQual process and procedure as appropriate.

12. Policy Review

This policy is maintained by the Head of Compliance and will be reviewed and updated where necessary to reflect updated legislation and customer feedback, improvements of operation and changes to the regulatory environment. All ProQual policies and procedures are signed off by ProQual's Strategic Planning Team.



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