THIRD PARTY ARRANGEMENTS AND OVERSIGHT POLICY

Policy Status: Governance, Quality Assurance and Risk Management Policy
Applies to: All third parties engaged by or on behalf of I-PATH
Policy Owner: Head Office
Governance Oversight: Examinations & Standards Committee (ESC) and Grand Council
Review Cycle: Annual or following material change to third-party arrangements
Date Last Reviewed and Updated: 15th February 2026

1. Purpose of the Policy

This policy sets out how I-PATH:

- identifies, appoints and manages third parties
- ensures appropriate oversight and accountability
- protects learners, assessment integrity and public confidence
- mitigates risk arising from third-party activity
- supports awarding-organisation and regulatory compliance

Third-party arrangements are managed in a way that ensures I-PATH retains effective control, clear accountability, and robust assurance over all activities carried out on its behalf.

2. Scope

This policy applies to all third parties, whether contracted formally or engaged operationally, including (but not limited to):

- Teacher Members and approved examination centres
- examiners and senior examiners
- contractors and consultants
- service providers (including IT, digital platforms, and administrative support)
- publishers or providers of educational resources
- venue providers used for examinations or assessments

This policy applies to activity relating to regulated and unregulated provision.

3. Definition of a Third Party

For the purposes of this policy, a third party is any individual or organisation that:

- is not an employee of I-PATH, and
- carries out activity that contributes to the delivery, assessment, quality assurance, administration or support of I-PATH qualifications, awards or services.

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4. Principles Governing Third-Party Arrangements

All third-party arrangements are governed by the following principles:

- Learner protection first
- Clarity of roles and responsibilities
- Proportionate oversight based on risk
- Transparency and accountability
- Compliance with I-PATH policies and procedures
- Ability to intervene, suspend or terminate arrangements where required

5. Governance and Accountability

5.1 Overall Responsibility

I-PATH retains full accountability for all activity carried out by third parties on its behalf.

Third-party arrangements do not transfer responsibility away from I-PATH.

5.2 Governance Oversight

- The Examinations & Standards Committee (ESC) oversees third-party arrangements that affect assessment integrity, standards, safeguarding or learner outcomes.
- The Grand Council provides strategic oversight of significant, high-risk or organisation-wide third-party relationships.

6. Due Diligence and Approval

6.1 Pre-Engagement Checks

Before engaging a third party, I-PATH will undertake proportionate due diligence, which may include:

- suitability and competence checks
- safeguarding and DBS requirements (where applicable)
- conflict of interest declarations
- data protection and cyber security assurances
- confirmation of understanding of I-PATH policies and expectations

6.2 Approval

Third-party arrangements must be approved by Head Office.
High-risk or novel arrangements may require ESC or Grand Council approval.

7. Contractual and Policy Requirements

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Where appropriate, third-party arrangements must include:

- clear scope of activity and responsibilities
- adherence to I-PATH policies and procedures
- safeguarding and welfare obligations
- confidentiality and data protection requirements
- conflict of interest management
- audit and monitoring rights
- escalation and reporting requirements
- suspension and termination provisions

Teacher Members and Centres are additionally governed by:

- Centre Approval requirements
- Terms and Conditions
- Examination and safeguarding policies

8. Oversight and Monitoring

8.1 Ongoing Monitoring

I-PATH monitors third-party performance through:

- examiner reports and quality assurance data
- centre compliance checks
- moderation and standardisation outcomes
- complaints, appeals and enquiries
- incident and adverse-effects reporting
- feedback from learners, teachers and examiners

8.2 Risk-Based Approach

The level of oversight applied reflects:

- the nature of the activity
- the potential impact on learners and standards
- the scale and frequency of engagement
- past performance and compliance history

9. Incident Reporting and Escalation

Third parties have a duty to:

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- report incidents, concerns or irregularities promptly
- cooperate fully with investigations
- comply with escalation requirements

Incidents involving third parties are managed under the:

- Adverse Effects, Incident Reporting and Regulatory Escalation Policy
- Safeguarding Policy
- Malpractice and Maladministration Policy

10. Non-Compliance and Intervention

Where concerns arise about a third party, I-PATH may:

- require corrective action
- impose additional monitoring or conditions
- suspend activity pending investigation
- terminate the arrangement

Serious or systemic concerns are escalated to the ESC and, where necessary, the Grand Council and awarding organisation.

11. Data Protection and Confidentiality

Third parties must:

- handle personal data lawfully and securely
- comply with I-PATH Data Protection and Privacy policies
- use data only for authorised purposes
- report data breaches immediately

Failure to comply may result in termination and further action.

12. Records and Audit

I-PATH maintains records of:

- third-party approvals and agreements
- due diligence checks
- monitoring activity
- incidents and outcomes
- decisions and actions taken

Records are:

- factual

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- securely stored
- auditable

13. Review and Continuous Improvement

Third-party arrangements are reviewed:

- as part of routine quality assurance
- following incidents or concerns
- during periodic governance review

Learning informs:

- policy updates
- contractual improvements
- risk management strategies

14. Relationship to Other Policies

This policy must be read alongside:

- Safeguarding Policy
- Quality Assurance Policy
- Assessment Policy
- Malpractice and Maladministration Policy
- Adverse Effects and Incident Reporting Policy
- Communications Policy
- Conflicts of Interest Policy

15. Policy Review

This policy will be reviewed:

- annually
- following significant third-party incidents
- following regulatory, operational or organisational change

Final Statement

Third-party arrangements are essential to I-PATH's work, but they carry inherent risk.
This policy ensures that all third-party activity is controlled, monitored and accountable, protecting learners, standards and public confidence while supporting awarding-organisation compliance.

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