



**Higher Education Services
Academic Partnerships
&
Due Diligence**

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Related documents: [Academic Partnerships & Admissions Committee Terms of Reference](#)

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1	A. Watson	28/07/25	Original version

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Reference point:

<https://www.qaa.ac.uk/docs/qaa/quality-code/uk-quality-code-for-higher-education-advice-and-guidance-principle-8.pdf>

Higher Education Services Academic Partnerships & Due Diligence Policy

1.0 Introduction

1.1 FutureLearn has a robust due diligence process in place to protect the organisation and ensure partners meet FutureLearn's standards. This process is designed to enable robust, informed, and timely decision making in partnering with others.

1.2 FutureLearn's due diligence process will risk assess each potential partner before committing to partnerships, to ensure partners are:

- Aligned to FutureLearn's strategy and values.
- Financially sustainable.
- Legally compliant.
- Ethically aligned.
- Have a good reputation.

1.3 The due diligence process is designed to highlight any potential issues such as controversies, sanctions, or corruption. It will also screen for financial risks, alignment with environmental, social and governance values, and confirm compliance with cyber security, privacy, and trade laws. As a global education provider FutureLearn forms agreements with multiple organisations (public, private, charity, business) globally and the process, therefore, will also assess local political and country risk factors. The process is designed to give all FutureLearn partners confidence that only those meeting FutureLearn standards will become partners.

2.0 Due Diligence

2.1 There are a number of legal acts and regulations which are related to due diligence, including:

Act/Regulation	Area of Focus	Due Diligence Process
Proceeds of Crime 2002 (updates 2025)	Money laundering	Identifies any suspicious reporting activity
Money Laundering Regulations 2017	Know your customer, customer due diligence and enhanced due diligence	Mandatory due diligence on partners
Companies Act 2006	Corporate governance	Directors' duty to act responsibly
Bribery Act 2010	Anti-corruption	Prevention of bribery in partnerships
UK GDPR/Data Protection Act 2018	Privacy & data protection	Assessing third-party data handling
Modern Slavery Act 2015	Ethical supply chains	Audit on forced labour and trafficking

Reference point:

<https://www.qaa.ac.uk/docs/qaa/quality-code/uk-quality-code-for-higher-education-advice-and-guidance-principle-8.pdf>

3.0 FutureLearn's Due Diligence Assessment Process for Higher Education Services Partners

3.1 The due diligence assessment process assesses the integrity, reliability, and suitability of potential or existing partners before entering into or continuing a relationship. It helps identify and mitigate legal, financial, reputational, and compliance risks, ensuring partners align with FutureLearn's values and regulatory requirements. This process supports informed decision-making, protects the organisation's reputation, and promotes responsible and sustainable partnerships. The assessment is undertaken by FutureLearn.

3.2 The process is overseen by the Vice President Higher Education Services or nominee. All findings are documented in a [Due Diligence Assessment](#) and reported to the Academic Partnerships and Admissions Committee. Risks should be classified as:

- **Low** – no material concerns.
- **Moderate** – concerns identified but manageable.
- **High** – significant risks that may warrant avoidance or conditional approval.

3.3 High risk findings trigger escalation to the Academic Standards and Quality Committee.

3.4 The process will review four main areas: finance, governance, ethical practice and sustainability, and reputational risks. Each stage of the process specifies objectives to assess due diligence and identify any subsequent risk. The [Due Diligence Assessment](#) is submitted to the Academic Partnerships and Admissions Committee.

3.4.1 Stage 1 - Financial Reports

Objective: Assess the financial health and stability of the institution/organisation.

- **Action:**
 - Obtain and review the latest two years of audited financial statements.
 - Evaluate solvency, liquidity ratios, and overall financial sustainability.
 - Identify reliance on short-term borrowing, declining income, or deficits.
 - Cross-reference with relevant regulatory filings and any financial risk warnings (e.g., from the OfS or equivalent bodies).
 - Ascertain whether students have access to SLC funds.

3.4.2 Stage 2 - Office for Students Notices

Objective: Identify regulatory concerns or required improvements.

- **Action:**
 - Search the Office for Students Register for any current or past Improvement Notices, Conditions of Registration, or other regulatory actions.
 - Note any compliance failures or ongoing monitoring requirements.
 - Flag serious or recurring issues for further investigation.

3.4.3 Stage 3 - Sustainability Checker

Objective: Assess the institution's/organisation's environmental and ethical sustainability practices.

Reference point:

<https://www.qaa.ac.uk/docs/qaa/quality-code/uk-quality-code-for-higher-education-advice-and-guidance-principle-8.pdf>

- **Action:**
 - Review performance using public sustainability metrics, including:
 - The People & Planet University League Table (UK)
 - University sustainability rankings or ESG reports (international)
 - Evaluate climate action plans, carbon reduction targets, and performance against environmental benchmarks.
 - Review the institution's/organisation's CSR strategy and any recorded impacts.

3.4.4 Stage 4 - Web Search and Reputation Review

Objective: Detect reputational risks or undisclosed concerns.

- **Action:**
 - Conduct an open-source web search using the institution's/organisation's name and key terms (e.g., data breach, fraud, investigation, dispute, lawsuit, controversy).
 - Investigate recent news coverage, social media, independent watchdogs, or forums.
 - Consult with GUS legal counsel to check there are no reported concerns.
 - Repeat this process for key members of the board or leadership team.
 - Document and assess the credibility and severity of any issues found.

3.5 When potential partners are outside of the UK, additional country risks will be considered, including any political, economic or cultural concerns.

3.6 Due diligence records are kept for a minimum of five years by the Academic Quality Department. Due diligence review is undertaken every two years or upon significant changes (e.g., new leadership, regulatory action).

4.0 FutureLearn's Due Diligence Process for all Suppliers including Academic Suppliers

4.1 In agreement with FutureLearn's parent company Global University Systems (GUS), the process for conducting due diligence checks on all suppliers including academic suppliers is conducted by the central procurement team.

4.2 The process includes:

- All new supplier requests will be sent to newsupplierchecks@gus.global - the GEI team will run the various checks via [CreditSafe](#) and report back. They will also check whether there are alternative suppliers already in place on the Preferred Supplier List.
- Current suppliers will be monitored for changes in their organisation or credit worthiness and any concerns or perceived change in risk will be communicated.
- Operational assessment of the risks posed will also be required.

4.3 When qualifying suppliers, the risk they pose to the Group, its employees and its customers should be assessed. This should include, but is not limited to, the assessment of the following areas:

- Data protection laws (such as General Data Protection Regulation ("GDPR"), (UK GDPR, etc) or other privacy risks
- Health, Safety, Security & Environmental risk
- Modern Slavery

Reference point:

<https://www.qaa.ac.uk/docs/qaa/quality-code/uk-quality-code-for-higher-education-advice-and-guidance-principle-8.pdf>

- Sanction checks
- Embargoed suppliers
- Counterfeit, Fraudulent & Suspect Items risk
- Corporate Social Responsibility risk
- Anti-Bribery & Corruption risk
- Contractual Delivery risk
- Financial risk
- Intellectual Property Rights (IPR)
- Information Security
- Sub-contractor/Supply Chain risk (if tiered supply in place)

4.4 The local Procurement team will conduct supplier due diligence, ensure checks are completed and help manage risks within the supply chain. The Group requires all its suppliers to operate ethically and mandates that they comply with the Modern Slavery Act 2015. All suppliers must maintain all required licences, registrations, and legislative certifications applicable to their area of expertise, industry, or sector.

4.5 All new suppliers will be required to sign the Group's [Supplier Code of Conduct](#) before being approved on the system.

4.6 In addition, the Group requires its preferred suppliers to evidence (as a minimum) that they:

- Apply procedures to prevent money laundering, fraud, bribery, corruption, and conflicts of interest.
- Comply with all data protection legislation and applicable regulations, and all guidance and/or Codes of Practice published by the Information Commissioner's Office or regional equivalent.
- Prohibit slavery and the use of forced, bonded, or child labour across the supply chain.
- Undertake sufficient Information Security protocols for their business. It is preferential but not mandated, where relevant to use suppliers who are at least Cyber Essentials certified.
- Prohibit unlawful discrimination and harassment to provide a safe and inclusive work environment.
- Provide employees with a living wage, as a minimum. Note that some institutions within the Group require real living wages to be applied on their contracts. This should be discussed directly prior to letting contracts and should involve the Procurement representative where applicable.

5.0 Partner and Academic Supplier Onboarding

5.1 All new partners and suppliers where applicable will receive onboarding training particularly where they have a direct impact on students.

5.2 Onboarding will comprise of, albeit not limited to:

- **Welcome and Introduction:** Provide an overview of FutureLearn's, mission, values, and how the partnership aligns with shared goals.
- **Programme and Services Training:** Detailed training on how programmes and professional services will deliver the content and assessment and work collegiately with the partners/suppliers.
- **Tools and Resources Access:** Set up accounts and provide access to and from partner portals, marketing materials, sales enablement tools, and documentation.
- **Roles and Responsibilities:** Clearly define mutual expectations, communication channels, points of contact, and escalation paths.
- **Operational Processes:** Agree on support workflows, reporting requirements, and performance metrics.

Reference point:

<https://www.qaa.ac.uk/docs/qaa/quality-code/uk-quality-code-for-higher-education-advice-and-guidance-principle-8.pdf>

- **Compliance and Agreements:** Review legal agreements, brand guidelines, confidentiality policies, and any regulatory or industry compliance needs.

6.0 Policy Monitoring

6.1 The policy will be reviewed annually by the Vice President Higher Education Services and any updates reported to the Academic Partnerships and Admissions Committee.

Reference point:

<https://www.qaa.ac.uk/docs/qaa/quality-code/uk-quality-code-for-higher-education-advice-and-guidance-principle-8.pdf>

Appendix

Partnership Due Diligence Assessment

Name of Partner:	
Partner Address:	
Partner Contact:	
Office for Students Registration Number:	
Type of Partnership:	
Proposed Start Date for the Partnership:	

Partnership Assessment	Comments
Intended programmes to launch with FutureLearn	
Start dates for each programme	
Financial Reports	Objective: Assess the financial health and stability of the institution.
Review the latest two years of audited financial statements.	
Evaluate solvency, liquidity ratios, and overall financial sustainability.	
Identify reliance on short-term borrowing, declining income, or deficits.	
Cross-reference with relevant regulatory filings and any financial risk warnings (e.g., from the OfS or equivalent bodies).	
Ascertain whether students have access to SLC funds.	
Office for Students Notices	Objective: Identify regulatory concerns or required improvements.
Search the Office for Students Register for any current or past Improvement Notices, Conditions of Registration, or other regulatory actions.	
Note any compliance failures or ongoing monitoring requirements.	
Flag serious or recurring issues for further investigation.	

Sustainability Checker	Objective: Assess the university's environmental and ethical sustainability practices.
Review performance using public sustainability metrics, including: <ul style="list-style-type: none"> • The People & Planet University League Table (UK) • University sustainability rankings or ESG reports (international) 	
Evaluate climate action plans, carbon reduction targets, and performance against environmental benchmarks.	
Review the university's CSR strategy and any recorded impacts.	
Web Search and Reputation Review	Objective: Detect reputational risks or undisclosed concerns.
Conduct an open-source web search using the university name and key terms (e.g., data breach, fraud, investigation, dispute, lawsuit, controversy).	
Investigate recent news coverage, social media, independent watchdogs, or forums.	
Consult with GUS legal counsel to check there are no reported concerns.	
Repeat this process for key members of the university board or leadership team.	
Document and assess the credibility and severity of any issues found.	

Country Risks (to be completed for international partners)

Any political concerns within the country	
Any economic concerns within the country	
Any cultural concerns within the country	

Risk Assessment

Low – no material concerns	
Moderate – concerns identified but manageable	
High – significant risks that may warrant avoidance or conditional approval	

Recommendations to the Academic Partnerships and Admissions Committee

Proceed	
Conditional Approvals	
Refer to the Academic Standards and Quality Committee	

FutureLearn Sign Off

Name & Signature:	
Title:	
Date:	