

Collaborative Provision Framework

Framework for the approval, governance and oversight of
collaborative provision

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1. Purpose

- 1.1 This Framework sets out how Walbrook Institute London [“Walbrook”] approves, governs, monitors and reviews **collaborative provision**: an arrangement whereby a partner organisation (a **delivery partner**) undertakes responsibility for the delivery of teaching and/or assessment that contributes to the award of Walbrook Higher Education qualifications or credit. The definition extends to arrangements granting partner students defined rights of admission to Walbrook programmes, with or without advanced standing (articulation and progression); it is set out, with the recognised categories of provision, in CP05.
- 1.2 The Framework exists to ensure that:
 - 1.2.1 the academic standards of any award or credit granted in Walbrook's name are equivalent to those of provision delivered directly by Walbrook, wherever and through whomever it is delivered; that where a partner delivers teaching or assessment contributing to a Walbrook award, the quality of learning opportunities is comparable and sufficient to enable students to achieve the award's outcomes, while recognising legitimate differences of delivery context; and that the interests of students are protected throughout the life of every partnership, including its closure;
 - 1.2.2 for articulation and progression arrangements, these commitments apply from the point of admission to Walbrook, with Walbrook's prior responsibilities limited to the rigour of the agreed entry mapping and the accuracy of information given to prospective students;
 - 1.2.3 for joint and dual awards, standards are secured through frameworks agreed with the partner awarding body that fully satisfy Walbrook's own requirements.
- 1.3 Walbrook retains ultimate and inalienable responsibility for the academic standards of all awards granted in its name. That responsibility cannot be delegated to, or shared with, a delivery partner, whatever the contractual division of operational duties.

2. Scope

- 2.1 This Framework applies to all collaborative provision involving Walbrook awards or credit, delivered in the UK or overseas, including franchise delivery, validation, joint and dual/double awards, and articulation and progression arrangements. The categories of collaborative provision, and arrangements that fall outside this Framework, are defined in **CP05 Definitions and Categories of Collaborative Provision**.
- 2.2 The Framework applies to every stage of the partnership lifecycle: strategic proposal, due diligence, partner approval, contracting, programme approval, delivery and ongoing oversight, periodic review, renewal, and termination or expiry including teach-out.
- 2.3 No member of staff may give any commitment, written or oral, to a prospective partner regarding the delivery of Walbrook awards except through the processes described in this Framework. Memoranda of Understanding which create no binding obligations may be signed in accordance with CP03.

3. Our responsibility to students, and the regulatory context

- 3.1 Walbrook's primary responsibility in collaborative provision is to its **students**: every student studying for a Walbrook award, wherever and through whomever it is delivered, is entitled to a high-quality education, secure standards, accurate information and protection if things go wrong. The regulatory expectations set out below are met **because**, and in so far as, they express that responsibility — Walbrook's compliance flows from its duty to students, not from deference to the regulator.
- 3.2 Thereby, this Framework enables Walbrook to meet its obligations as a provider registered with the Office for Students (OfS), including in particular:
- **Conditions B1–B5** (quality, learning resources, student support, assessment and standards), which apply in full to courses delivered through subcontractual and other collaborative arrangements;
 - **Condition E10 (Subcontracting)**, which applies to lead providers with 100 or more students registered on relevant UK-based subcontractual courses and requires the maintenance and implementation of a Subcontracting Information Source (SIS) meeting the OfS minimum content requirements, an overarching obligation to identify and address risks to students and taxpayers, and publication of specified information including the proportion of tuition fee retained and the rationale for subcontracting;
 - **Conditions C1–C3** (consumer protection), the CMA's advice to higher education providers on consumer protection law, and conditions F (transparency) and E (governance) as applicable.
- 3.3 The Framework is informed by the **UK Quality Code for Higher Education (2024)**, in particular Sector-Agreed Principle 8 (Operating partnerships with other organisations) and its Advice and Guidance, the **UUK/GuildHE/CUC Franchise Governance Framework (2024)**, and QAA guidance on transnational education (TNE), including the Quality Evaluation and Enhancement of UK TNE scheme.
- 3.4 From academic year 2028-29, UK-based delivery partners with 300 or more franchised students will themselves be required to register with the OfS for their courses to remain designated for student finance. The Partnership Committee monitors the registration status and intentions of all current and prospective UK delivery partners and factors these into approval and renewal decisions.
- 3.5 **Position on UK subcontracting.** Walbrook has no intention of entering into a UK subcontractual (franchise) arrangement during the period of the current Strategic Plan (2026–31). The provisions of this Framework relating to such arrangements — including condition E10 and the Subcontracting Information Source — are maintained so that the Framework is complete and Walbrook is ready should that position change; any change of position would itself require Executive Committee approval of a revised partnership strategy before any proposal could proceed under CP03.
- 3.6 For provision delivered outside the UK, Walbrook and its partners must comply with the legislative, regulatory and professional requirements of the host country, including any requirement for in-country approval, registration or accreditation of the provision, alongside all applicable UK requirements.

4. Principles

- 4.1 **Standards are non-negotiable.** Awards delivered through partners are subject to the same academic regulations, frameworks and assessment requirements as awards delivered by Walbrook directly. Quality assurance of collaborative provision is at least as rigorous, secure and open to scrutiny as for directly delivered provision.
- 4.2 **Students' interests come before financial considerations.** Partnerships are entered into, continued and ended on the basis of educational merit and student interest. The strategic and financial rationale for each arrangement is documented, scrutinised and published in accordance with condition E10.
- 4.3 **Oversight is risk-based and proportionate.** The intensity of due diligence, monitoring and review reflects the category of provision, the scale of the arrangement, the maturity and track record of the partner, and the delivery context (including country risk for TNE). Proportionality never reduces oversight below the minimum required to secure standards and meet regulatory obligations.
- 4.4 **Responsibilities are explicit.** The respective responsibilities of Walbrook and each partner for every element of delivery, assessment, support, quality assurance and information are recorded in a legally binding written agreement signed before students are recruited, and communicated clearly to staff and students of both organisations.
- 4.5 **Decisions are evidenced and separated.** Academic approval (the judgement that standards and quality can be secured) and business approval (the judgement that the arrangement is strategically and financially sound) are distinct tests, each of which must be passed. Academic approval rests with the academic governance structure; final institutional approval of new partners rests with the Executive Committee.
- 4.6 **Partnerships are managed across their whole life.** Every partnership has a named senior owner, an approved exit strategy, and teach-out and student protection arrangements that would allow students to complete their studies in the event of partner failure or withdrawal.
- 4.7 **No serial or sub-delegated arrangements.** A delivery partner may not delegate, subcontract or otherwise pass to a third party any element of its responsibility for the delivery, assessment or support of a Walbrook award, and may not use its arrangement with Walbrook, or the existence of a Walbrook award, as the basis for the partner's own collaborative, franchise or validation arrangements with another organisation. This prohibition is a mandatory term of every written agreement (CP03 §6.1).
- 4.8 **Delivery in English.** Save where Academic Board has expressly approved an alternative for a specific programme, all collaborative provision is taught, supported and assessed in English. This is an absolute requirement of approval, not a factor to be weighed or scored in due diligence (CP03 §3.2), and reflects the OfS's expectation, under conditions B1–B5, that Walbrook secures for every student academic standards and learning opportunities equivalent to those of its directly delivered provision — an assurance that depends on assessment being conducted in the language in which Walbrook's standards are set and quality-assured.

5. Governance structure

5.1 Oversight of collaborative provision is exercised through the following bodies:

Body	Role in collaborative provision
Board of Governors	Ultimate accountability for the sustainability and reputation of Walbrook, and for the effectiveness of the systems of control over UK-based subcontractual arrangements required by condition E10. Receives an annual report on collaborative provision, including risk.
Executive Committee	Final institutional approval of new delivery partners and of partnership renewal, on the recommendation of the Partnership Committee; approval of the business case and financial terms; decisions to suspend recruitment or terminate a partnership (other than on academic grounds reserved to Academic Board).
Academic Board	Custodian of academic standards. Approves this Framework and the academic regulations applying to collaborative provision; approves programmes delivered through partners through its programme approval processes; receives assurance from the Partnership Committee.
Partnership Committee	Standing committee responsible for scrutiny of proposed partnerships and due diligence outcomes, ongoing quality assurance oversight, the risk register and the register of collaborative provision. Recommends partner approval to the Executive Committee and reports to Academic Board. Constituted under CP02.
Schools	Academic ownership of partner-delivered programmes: link tutors, annual monitoring, day-to-day academic liaison. Each School is headed by an Academic Lead; the Schools are managed by the Academic Dean.
Professional services	Registry (records, certification, data returns, assessment boards), within which Quality Office fulfils specific tasks. Finance, Risk & Compliance (contracts, due diligence), Admissions and Marketing (oversight of recruitment and published information).

- 5.2 The approval pathway for a new partner is: sponsoring School and Quality Office develop the proposal; the Partnership Committee scrutinises the outline case, commissions and reviews due diligence, and makes a recommendation; **the Executive Committee gives final approval**; Academic Board (or its delegated panel) approves the specific programmes. No single body's approval substitutes for another's. The detailed procedure is set out in **CP03 Partner Approval and Due Diligence Procedure**.
- 5.3 The **Provost** is the nominated senior individual with portfolio responsibility for collaborative provision and acts as the senior institutional owner of this Framework's operation.

6. The partnership lifecycle

- 6.1 Every partnership passes through the following stages. Gateways at the end of each stage must be passed before the next begins.

Stage	Description	Governed by
1. Strategic proposal	Outline case: strategic fit, market, category of provision, indicative finances, initial risk screen.	CP03
2. Due diligence	Legal, financial, academic, reputational and operational due diligence; site visit; country/TNE assessment where relevant.	CP03
3. Partner approval	Partnership Committee scrutiny and recommendation; Executive Committee final approval; risk tier assigned.	CP03
4. Agreement	Legally binding written agreement signed before any recruitment or delivery; responsibilities matrix annexed.	CP03
5. Programme approval	Approval of each programme for delivery at/with the partner under Academic Board processes, including delivery-site scrutiny.	CP04
6. Delivery & monitoring	Link tutors, data monitoring, annual partner review, external examining, student voice, committee oversight.	CP04
7. Periodic review & renewal	Full re-approval (normally at least every five years), refreshed due diligence, renewal recommendation to Executive Committee.	CP03 / CP04
8. Exit	Planned expiry or termination; teach-out plan; student protection; records retention; certification of remaining students.	CP04

7. Register and published information

- 7.1 The Quality Office maintains the **Register of Collaborative Provision**: the definitive record of every partner, agreement, programme, delivery site, category of provision, risk tier, approval and review dates, and named link tutors. The Register is reported to each meeting of the Partnership Committee and supports OfS and HESA data returns.
- 7.2 In addition to, and irrespective of, the specific regulatory publication required by condition E10 (§7.3), Walbrook publishes on its website, and keeps up to date at least annually, a full public list of every current collaborative partner drawn from the Register of Collaborative Provision, showing for each the category of provision (per CP05) and the Walbrook programme(s) delivered through the arrangement. This is a standing commitment to transparency about the existence of all of Walbrook's collaborative arrangements, not only those falling within condition E10.

- 7.3 Walbrook publishes, and keeps accurate, the information about each subcontractual arrangement required by condition E10, including the proportion of tuition fees retained by Walbrook and the rationale for the arrangement, together with information for students about which organisation is responsible for which aspects of their experience and where to seek support and redress.
- 7.4 All marketing and published information relating to collaborative provision is approved by Walbrook before use. Partners may not advertise, or recruit to, Walbrook awards except as permitted by the written agreement.

8. Subcontracting Information Source (SIS)

- 8.1 Where condition E10 applies, Walbrook maintains a Subcontracting Information Source meeting the OfS minimum content requirements. The documents in this Framework collectively provide the core of the SIS, as mapped below. The Registrar is responsible for keeping the SIS current and for providing it to the OfS on request.

SIS minimum content requirement	Where addressed
(a) Strategic rationale for subcontracting, prioritising student need over financial considerations	CP01 §4; Executive Committee-approved Partnership Strategy; published rationale per partner (CP01 §7)
(b) Assessment of new arrangements: feasibility, compliance with B1–B5, due diligence, partner capacity and resources	CP03 (whole document, esp. stages 2–3 and Appendix A)
(c) Oversight by the governing body and risk/audit functions	CP01 §5; Partnership Committee ToR (CP02); annual report to Board of Governors; internal audit programme
(d) Policies and procedures: complaints, whistleblowing, conflicts of interest, public funding risk, agents, admissions, course approval, ongoing monitoring, academic misconduct, data access and verification, delivery failure and teach-out, poor performance	CP04 (whole document); CP03 §8 (conflicts of interest); institutional complaints and whistleblowing policies as applied to partners
(e) Adaptability of the system to change and growth	CP01 §10; annual review of the Framework; risk-tier escalation in CP04 §8

9. Roles and responsibilities

- 9.1 **Provost** — nominated senior individual and owner of the Framework's operation; chairs or nominates the chair of the Partnership Committee; presents partner approvals and the annual collaborative provision report to the Executive Committee and Board of Governors.
- 9.2 **Registrar** — secretary to the approval process; custodian of the SIS and the Register of Collaborative Provision; ensures regulatory returns and notifications (including reportable events and PSRB notifications under CP04 §2.3) are made.

- 9.3 **Academic Lead of the sponsoring School** — academic sponsor of each partnership; accountable for programme-level quality; nominates link tutors. The **Academic Dean** manages the Schools, assures academic capacity to sponsor and support partnerships across Schools, and arbitrates where a partnership spans more than one School.
- 9.4 **Link tutors** — the named academic contact for each partner-delivered programme, with duties defined in CP04.
- 9.5 **Director of Finance and Risk & Compliance Manager** — financial and legal due diligence, contract execution, fee arrangements, and oversight of risks to public funding.
- 9.6 **All staff** — must declare any interest in an actual or prospective partner in accordance with the conflicts of interest policy; must not enter into commitments outside this Framework.

10. Review of this Framework

- 10.1 The Partnership Committee reviews this Framework and its associated documents annually, and additionally whenever there is a material change in regulatory requirements, in Walbrook's partnership portfolio (including significant growth in subcontracted student numbers), or following any serious incident or audit finding. Amendments are approved by Academic Board, except that changes to approval authorities also require Executive Committee endorsement.
- 10.2 The document suite comprises:

Code	Title	Owner
CP01	Collaborative Provision Framework (this document)	Provost
CP02	Partnership Committee Terms of Reference	Provost
CP03	Partner Approval and Due Diligence Procedure	Provost
CP04	Quality Assurance and Oversight of Collaborative Provision	Quality Office
CP05	Definitions and Categories of Collaborative Provision	Quality Office
CP06	Partner Risk Scoring Matrix	Provost

11. Document governance

Field	Detail
Document code	CP01
Version	1.0
Document owner	Provost
Approving authority	Academic Board
Date of approval	12 August 2026
Implementation Date	1 October 2026
Date of next review	Summer 2028
Version history	Substantive update from previous framework