

FIT AND PROPER PERSONS POLICY

Ignition Pro - School for Entrepreneurs Limited

Document Title:	Fit and Proper Persons Policy
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1. PURPOSE

This policy explains how Ignition Pro – School for Entrepreneurs Limited (“the Institution”) meets its obligations under initial registration condition E9 of the Office for Students. Condition E9 requires the Institution to have clear processes to ensure that individuals in key roles are fit and proper, and that they are able, in terms of their physical and mental health, to carry out their duties effectively.

The policy defines who is considered a “relevant individual”, including members of the Board of Governors, senior leaders, and others in positions of significant responsibility. It explains what “fit and proper” means in practice, including standards of honesty, integrity, reputation, competence, and financial soundness, and how these are assessed before and after appointment.

It also sets out the checks carried out before appointment, such as identity checks, references, and declarations, and explains how the Institution assesses whether individuals are able to perform their role. Where appropriate, this includes consideration of physical and mental capacity, handled sensitively and in line with legal requirements.

The policy explains how the Institution maintains ongoing assurance that individuals remain fit, proper, and capable throughout their time in post. This includes regular declarations, monitoring, and clear processes for reviewing and addressing any concerns. Where an individual no longer meets the required standards, appropriate action may be taken, including review, investigation, and, where necessary, removal from their role.

The Institution applies this policy in a fair, consistent, and proportionate way, in line with relevant legal requirements, including equality, employment, and data protection legislation. Information is handled confidentially and used only for assessing suitability.

Through this policy, the Institution ensures that individuals in positions of responsibility are suitable, capable, and able to act in the best interests of the Institution and its students, supporting strong governance and compliance with Condition E9.

2. WHO IS A RELEVANT INDIVIDUAL

A relevant individual is any person falling within the definition in Office for Students condition E9.4. At Ignition Pro - School for Entrepreneurs Limited this includes all members of the Board of Governors, all members of institutional committees that exercise decision-making authority, the Chief Executive Officer, the Registrar, the Dean, and other members of the Senior Management Team who carry significant responsibility for the governance or management of the institution or for the management of relevant public funds. Where uncertainty arises about whether a particular individual falls within this definition, the Registrar determines the position in consultation with the Chair of the Board of Governors.

3. THE FIT AND PROPER STANDARD

A relevant individual meets the fit and proper standard if they are of good character and have not been involved in conduct that would bring the institution or the higher education sector into disrepute; if they have the qualifications, competence, skills, and experience needed for the duties of the office to which they are appointed; if they are able by reason of their health, after reasonable adjustments, to perform those duties properly; if they have not been responsible for, privy to, or involved in facilitating serious misconduct or mismanagement in their employment or in the conduct of any entity with which they are or have been associated; if they are not disqualified from acting as a company director or charity trustee under applicable legislation; and if they have not been convicted of a criminal offence or been subject to regulatory sanction in circumstances that would render them unsuitable for a position of responsibility in a higher education provider.

4. PRE-APPOINTMENT CHECKS

Before any relevant individual takes up their appointment, the Registrar ensures that the following checks are completed.

Self-Declaration

Every relevant individual completes the institution's Fit and Proper Self-Declaration Form before commencing their role. The form requires disclosure of information relevant to fitness and propriety across all criteria in section 3, including criminal convictions, regulatory sanctions, disqualifications, civil judgements, disciplinary findings, dismissals, and involvement with entities subject to regulatory action. The individual signs the declaration to confirm its accuracy and completeness. Completed declarations are held securely by the Registrar and not disclosed except as required by law or regulatory obligation.

Identity Verification

The identity of all relevant individuals is verified by sight of original photographic identification - a passport or driving licence - together with one document confirming the individual's address. Copies are retained on file.

Right to Work

For relevant individuals employed by the institution, the right to work in the United Kingdom is verified in accordance with applicable Home Office requirements before the person commences their role.

Disclosure and Barring Service Check

Where the nature of the role involves regular contact with or proximity to students, an Enhanced DBS check is obtained before the individual takes up their appointment. For Board members and other non-executive relevant individuals not in regular contact with students, a standard or basic DBS check is obtained as appropriate to the role and applicable guidance.

References and Employment History

For employed relevant individuals, at least two professional references are obtained from people who can speak to the appointee's competence, character, and suitability before any offer is confirmed. Employment history is verified for the period specified in the relevant job description, and any unexplained gaps are discussed with the candidate before appointment proceeds.

Qualification Verification

Where a role requires specific qualifications, these are verified by sight of original certificates or transcripts, copies of which are retained on file.

5. ONGOING ASSURANCE

The institution's responsibility to ensure fitness and propriety does not end at appointment. Every relevant individual completes a new Self-Declaration Form annually, either confirming that circumstances have not changed materially or disclosing any new relevant information. Any relevant individual who becomes subject to a criminal charge or conviction, a regulatory investigation or sanction, a civil judgement, or a disqualification is required to notify the Registrar without delay.

The Registrar reviews all annual declarations and refers matters of concern to the Chair of the Board of Governors and, where appropriate, to the Audit and Risk Committee. Where a concern arises about an individual's fitness and propriety during tenure, the Registrar refers it to the Chair for assessment. The response will be proportionate and may include temporary suspension from duties, a formal investigation, removal from office, or referral to a regulatory or law enforcement body. The Board receives an annual report from the Registrar confirming that checks are current for all relevant individuals and identifying any matters requiring Board attention.

6. RECORDS AND DATA PROTECTION

All information collected through this process is held securely in line with the Institution's Data Protection Policy and the requirements of the UK General Data Protection Regulation. Access to this information is limited to the Registrar, the Chief Executive Officer, and any other individuals who have a clear and legitimate need to access it for operational purposes.

The Institution ensures that personal data is handled lawfully, fairly, and transparently, and that appropriate measures are in place to protect it from unauthorised access, loss, or misuse. Information is used only for the purposes set out in this policy and is kept confidential at all times.

Records are retained for the duration of the individual's appointment and for six years after it ends, unless a longer retention period is required by law or regulatory guidance. At the end of the retention period, records are securely deleted or destroyed in line with the Institution's data management procedures.

7. REPORTING TO THE OFFICE FOR STUDENTS

The institution reports to the Office for Students any matter relating to the fitness and propriety of a relevant individual that constitutes a reportable event under the conditions of registration. This includes discovering that an individual did not meet the standard at appointment, or circumstances arising during tenure that cause them to cease to meet it.

8. REVIEW

This policy is reviewed annually by the Board of Governors to ensure that it remains effective, up to date, and aligned with the Institution's legal and regulatory obligations, including any changes to the conditions of registration set by the Office for Students and other applicable requirements.

The policy will also be reviewed at any time if there are significant changes in legislation, regulatory expectations, or institutional arrangements that may affect its operation. Any material amendments to the policy must be formally approved by the Board of Governors before implementation.

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