**1.Introduction**

This policy outlines ATS expectations in relation to communicating with people other than registered students (e.g. family members, other representatives etc.) in relation to Student Complaints, Academic Appeals, Academic Misconduct, Further, this includes Business partners include joint venture or equity partners, acquisition targets, service providers, suppliers, vendors, consultants, subconsultants, contractors, subcontractors, or any other person acting on the ATS’s behalf (such as agents, representatives or sponsors) and their employees or other persons working on their behalf.

 **2. Scope**

With the exception of the limited circumstances outlined below, and taking into account contractual, pastoral, data protection and other considerations, it is the ATS’s expectation that its students and third part parties will engage and communicate directly with the ATS management staff.

The excepted circumstances in which ATS may talk to a third party are:

• It is permissible for third parties to enquire, in general terms, about process and procedure, but not about the facts of a specific case or of an individual.

• Requests for third party representation made on the basis of a disability will be given due consideration and, if appropriate, reasonable adjustments will be made to ensure that students who have a disability as defined by the Equality Act will have an equitable experience and are able to enter into communication with ATS staff and engage with ATS processes.

• Exceptional circumstances where a student is temporarily prevented from being able to communicate directly for themselves, for example, on medical grounds or being abroad without reasonable access to email. Evidence must be provided to demonstrate that the student is not able to act on their own behalf and the length of time this is expected to last.

* ATS will usually require written permission from the student to liaise with a third party due to the above exceptional circumstances. If this is not possible, due to incapacitation of the Student, ATS may agree discuss matters with a third party. This decision will be taken by the CM.

**3. Due Diligence**

The key principle when dealing with business partners is “trust but verify.”

Proper due diligence procedures enable ATS to follow through on its commitment to act with integrity by protecting against partnering with companies and individuals that do not operate pursuant to ethical principles. Such procedures also minimize reputational and legal risks arising from international sanctions, anti-corruption, anti-money laundering and modern slavery legislation, by investigating potential business partners’ past and current ethical standing.

Generally, managing risk involved with third party relationships and dealings can be achieved through

1. assessing third party risk,
2. (ii) binding third parties to the Corporation’s business standards, and
3. (iii) monitoring third party compliance with the Corporation’s business standards

**4. Assessing The Third Party**

**4.1 Gather and Document Information**

Proper documentation is essential and provides evidence of the ATS’s due diligence procedures and the considerations that underlie its commercial decisions. As such, all investigations, risk assessments, due diligence questionnaires, background checks, integrity reviews, and continuous monitoring reports made in the context of the due diligence process must be appropriately documented.

**4.2 Conduct A Risk Assessment**

If the potential partner is new to ATS, a risk assessment should be completed in order to determine the proper level of integrity review. The level of the integrity review can notably be based on an assessment of the following risk factors:

— Country risk: This includes the risks associated with the country where the project will take place, as well as the country in which the third party is headquartered or located. Important factors include the country’s political, economic and business environment.

— Transaction risk: This includes the level of commercial, financial and contractual risk, as well as the risk associated with the type of work delivered by the third party throughout the project.

— Relationship risk: This includes risks associated with the type of relationship between the Corporation and the third party, as well as the third party’s connections and reputation.