

# Quality Assurance Toolkit

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**The Duke of Edinburgh's International Award Foundation**

August 2019

Version: 1.1

## 1. Version control

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Version	Date	Author	Notes
1.0	May 2019	NA/SHD	
1.1	August 2019	NA/SHD	

## 2. Relevant Policies

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1. Foundation Data Protection Policy
2. International Handbook
3. Operational Licences
4. Key Governing Documents of the Association

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## 1. Introduction

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### 1.1. What is the purpose of this toolkit?

1.1.1. The National Award Operator (NAO) licence requires operators to demonstrate that they have adopted and implemented a quality management framework such as those suggested in this toolkit (Standard 3.1. The NAO must evidence the adoption and implementation of the Foundation's **Quality Assurance Toolkit**). This toolkit has therefore been created to help NAOs establish, implement and maintain an effective quality management framework.

1.1.2. A quality management framework should be focused on providing confidence in the measures taken to ensure the licence standards are fulfilled, guaranteeing an appropriate level of quality is being maintained in the delivery of the Award.

1.1.3. This toolkit aims to support NAOs through the implementation of robust procedures, methods and actions of quality control and ensure there is a shared understanding of what is required. The implementation of a robust quality management framework will enable each Award operator to support the critical initiatives of the Global Award Strategy, as agreed in 2015 at the Association's Forum in Toronto.

### 1.2. Who can benefit from this toolkit?

1.2.1. The toolkit has been designed to help all those involved in delivering the Award, ranging from NAOs to Award Centres. This is a document that can be shared throughout the Award network to all those wishing to review and improve their current methods of quality assurance. As quality assurance is a continuous cycle, even those who have fulfilled the standards must continually review and update their methods and procedures to ensure continued quality assurance.

### 1.3. How to use this toolkit?

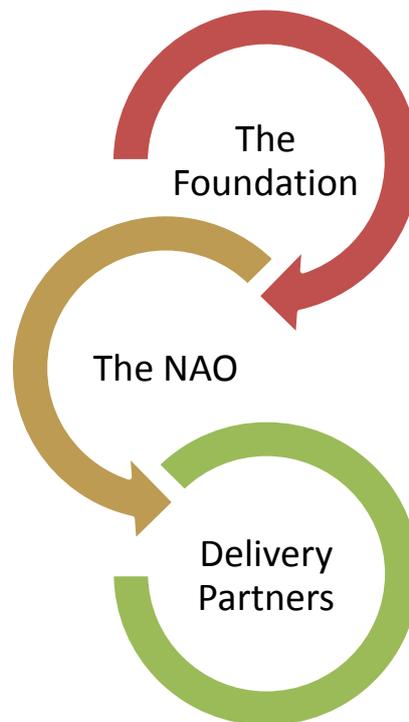
1.3.1. This toolkit aims to provide a quality management framework that includes all aspects of Award management. Developing a quality management framework to ensure quality assurance is fundamental to both the governance & management and delivery standards of the NAO licence. The quality management framework outlined below aims to streamline the relationship between key stakeholders allowing for increased growth and sustainability of the NAO.

1.3.2. Through establishing clear channels of responsibility this toolkit can be used to assess what the NAO has in place currently and areas where it needs to improve its quality assurance methods to better align with the licence. The methods of quality assurance

an NAO chooses to implement may vary from NAO to NAO. However the responsibilities of quality management are the same. The NAO licence ensures that the same level of quality assurance is achieved by all NAOs.

## 1.4. Responsibilities of ensuring quality

1.4.1. This toolkit aims to highlight the different levels of responsibility involved in maintaining an ongoing quality assurance process. Figure one illustrates the relationship between the licences that are issued by the Foundation and the NAO, while also indicating the quality assurance processes that flow between the head licence all the way to Award Centres.



*Figure one*

### 1.4.2. At Foundation level:

1.4.2.1. The Foundation has developed this quality assurance toolkit in order to highlight to NAOs the varying levels of responsibility, including the role the Foundation has to play in this process. The Foundation has its own quality management framework in place that covers its responsibilities for ensuring the quality of the Award. The licence review is an integral part of this alongside the ongoing account management provided by the Regional Offices.

1.4.2.2. The Foundation additionally uses policy to ensure quality and to support NAOs adhere to the core standards in the head licence. Using licence reviews as a method of quality assurance allows the Foundation to check and support the operations of the NAO. Licence reviews offer the Foundation the opportunity to review its own practices and reflect upon changes within the network. This can be exhibited in the recent developments the Foundation has made to evolve the NAO Full and Conditional Licences as well as the development of a generic sub-licence for NAOs to utilise.

#### **1.4.3. At NAO level:**

1.4.3.1. The NAO licence clearly indicates the responsibilities of the NAO to have in place methods of quality assurance (standards 10.6.2(a), 10.6.3(a) and 11). This toolkit is intended to help NAOs gain a better understanding of the requirements of the head licence. NAOs are therefore required to adopt suitable processes and procedures of quality assurance that extend to their delivery partners (Award Centres, Operating Authorities and Activity Providers).

1.4.3.2. The NAO is responsible for having in place a quality management framework containing methods of quality assurance that control not only their own internal operations, for example performance management systems of the Board and staff. But also their external operations, for example having in place a solid sub-licencing model which provides the basis for licence reviews of delivery partners. The NAO is responsible for ensuring the organisation they are licencing to be a delivery partner is able to meet the standards of the licence. This initial check operates as a method of quality assurance.

1.4.3.3. A NAOs responsibility to guarantee quality can be seen as similar to that of the Foundation. However the NAO is responsible for the direct delivery of the Award therefore the need for a tight quality management framework model is necessary. For example the use of satisfaction surveys of former Award participants (the Foundation's Research Team can support the NAO to achieve this).

#### **1.4.4. At delivery partner level:**

1.4.4.1. The NAOs sub-licence with the organisation responsible for delivering the Award is the basis for quality assurance processes and procedures within the organisation itself. The licenced centre is responsible for adhering to the standards in the sub-licence and should be aware that if they fail to meet the standards their licence will be terminated.

1.4.4.2. The delivery partner is therefore responsible and accountable to the processes and procedures the NAO puts in place.

## 2. Quality in the Award

### 2.1. The different roles of those involved in quality assurance of the NAO

2.1.1. As stated above, the Foundation's mandate to assess a NAOs ability to deliver the Award is enshrined in the Licence.

2.1.2. In order to have an appropriate quality management framework in place there are key processes that NAOs can establish to have a high level of quality assurance. The licence addresses a number of areas where the NAO needs to embed processes.

2.1.3. Core standards from within the licence have been extracted below and the responsibilities of each key player involved in assuring quality is outlined (e.g. The Foundation, the NAO and the Award Centre/Delivery Partner). The aim of this is to distinguish how the NAO can go about producing a process to build a quality management framework.

### 2.2. Ensuring quality through proper and good governance:

2.2.1. Licence clause 2.1 *The NAO must have clear governance structures that will uphold and comply with the Foundation's Governance Standards, as set out in the **Trustees toolkit**.*

Key players	Their role
The Foundation (IAF)	As the head licence holder, the IAF has the responsibility to ensure that the entity it is licencing to deliver the Award is a legal entity with whom it and others can develop binding contractual relationships. Thus ensuring a level of quality in advance of the entity commencing delivery. The IAF assesses the NAO is able to meet the core standards of the licence through the licence review process. The core standards of the licence address areas of governance and management, therefore the role of the Foundation is predominately to support the NAO in maintaining a level of good governance.
The NAO	To review and ensure it has a set of founding documents that are inclusive of the Fundamental and Operational principles of the Award and Code of Practice. These documents must also be reflective of the IAFs MoU and the International Association Global Strategy.

The Award Centre/Delivery Partner	It is expected that an Award Centre/delivery partner will be committed to the delivery of the Award and their continued involvement will be demonstrated by an Award Policy. This will be regularly reviewed and updated to ensure it is in line with the NAOs mission and goals.
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### 2.3. Ensuring quality through sub-licensing:

2.3.1. Licence clause 12.4 *The NAO shall use the Foundation's **Generic Sub-Licence and guidance** as a guide for its own sub-licences to Award Centres or Open Award Centres, and shall ensure that its own sub-licences offer a material equivalent or greater protection to the NAO and the Foundation.*

Key players	Their role
The Foundation:	Through its own methods of quality assurance the IAF recognised the need for a generic sub-licence to be developed. This supports NAOs to achieve the licence standards and therefore ensure quality control of the sub-licensing document itself.
The NAO:	To ensure that each centre delivering the Award has signed the sub-licence and has in place all appropriate documentation as required in the sub-licence. The NAO must have in place a schedule to review Award Centres and delivery partners to ensure they are compliant with the standards in the sub-licence.
The Award Centre/Delivery Partner:	To achieve full and on-going compliance of the sub-licence the Award Centre and delivery partner must be aware of the standards. Therefore it is their responsibility to ensure they are meeting the sub-licence standards set by the NAO through internal review of their delivery.

### 2.4. Ensuring quality through performance management (review and evaluation):

2.4.1. Licence clause 11.3 *The NAO must have a performance management system – including use of continuous improvement tools – in place for managing Board, Staff, volunteers and relevant sub-licensees.*

Key players	Their role
The Foundation	Through conducting the licence reviews and continual account management of NAOs the IAF is able to review the performance management of the NAO at all levels of operation, from Board to Award Centre. Using the licence as the basis the IAF is therefore able to make requirements and recommendations to improve the performance management structures of the NAO. The IAF offers support to the NAO to implement these recommendations and

	evaluate the Award's delivery by giving the NAO access to the drafted satisfaction surveys.
The NAO	<p>The process of review and evaluation of the governance &amp; management and delivery structures can be broken down into levels of performance management:</p> <p><b>The Board</b> must review its performance in relation to the organisational strategy, the NAO's mission, goals and impact of the Award to evaluate their capabilities to support the growth and improvement of the NAO once a year.</p> <p><b>The NAO</b> should have staff performance management systems in place that allow for the continual improvement and review of their capabilities.</p> <p><b>Volunteers and Award Centres/delivery partners</b> to review their ability to deliver the Award and the ability of the volunteers to deliver to all participants. This can be done through generating their own surveys or using the IAFs satisfaction surveys to assess the impact of the Award.</p>
The Award Centre/Delivery Partner:	The Award Centre and delivery partner should be constantly reviewing and evaluating the experience of their participants to enable them to alter delivery methods as necessary or alert the NAO if there are any issues with delivery.

## 2.5. Ensuring quality of the logo and materials:

2.5.1. Licence clause 6.2 *The Name, Logo and Materials of the Award must be used in accordance with the Foundation's **Brand Guidelines**.*

Key players	Their role
The Foundation	All intellectual property is owned by the IAF, alongside the Branding Guidelines it is the responsibility of the IAF to check the Brand is being used and distributed correctly by the NAO. Providing access and monitoring use of the Brand Centre is another way the IAF can check the NAO is using the brand correctly.
The NAO	To ensure the logo is on all materials and is used correctly. To make the correct logo readily available to all Award Centres and delivery partners. The NAO needs to have a method in place for checking those who have access to the logo are using it correctly. The NAO should only distribute the logo to those who are licenced appropriately.
The Award Centre/Delivery Partner:	The Award Centre and delivery partners need to be aware of the appropriate logo for them to use and should follow the Branding Guidelines as supplied by the NAO.

## 2.6. Ensuring quality through a risk management process:

2.6.1. Licence clause 4.3 *The NAO shall, on at least an annual basis, maintain an appropriate **Risk Management Register** that covers both the operational, structural and strategic risk in all material respects, and requires its sub-licensees to perform and comply in all material respects with the NAO's Risk Management Register.*

2.6.2. NAOs can access a template Risk Management matrix on the intaward resources page on the website.

Key players	Their role
The Foundation	The IAF has its own Risk Register that is constantly reviewed and managed by the Board and key senior management team members. The Risk Register covers three levels of risk; structural, organisational and strategic. This enables the IAF to ensure all levels of risk are either reduced or mitigated allowing for strong support and management of the International Award.
The NAO	To develop a risk register that identifies, assesses and prioritises risks. The aim of this document is to enable the NAO to reduce, monitor and control the probability of risks occurring. The risk register needs to divide risk to ensure all aspects of potential risk affecting the organisation are covered, from governance & management to delivery. The risk register should also include clear responsibilities assigned to the management of certain risks. This document needs to be reviewed and signed off by the NAO's Board.
The Award Centre/Delivery Partner :	To ensure all activities run under the name of the Award are fully risk assessed and are constantly reviewed by the Award Leader.

## 2.7. Ensuring quality through reporting requirements:

2.7.1. Licence clause 7.4 *The NAO must comply with the Foundation's Evaluation and Reporting Requirements Policy and submit to the Foundation a report in accordance with the policy each year during the [licence] Term (at the date specified in the Evaluation and Reporting Requirements Policy).*

Key players	Their role
The Foundation	To have in place clear structures and processes that allow for the collection and reporting of annual statistics. The IAF needs to have clear serious incident reporting structures and policy in place that clarifies what is a reportable incident and how to report it. The IAF is then responsible for reviewing and assessing the incident and determining if any further action or policy change is required.
The NAO	The NAO plays a similar role to the IAF in this regard in what they ask of their licensees. The NAO needs to have appropriate reporting mechanisms in place to collate information from Award Centres and delivery partners that allow for them to be in a position to comply with the IAFs reporting requirements. Additionally the NAO is

	responsible for providing information to Award Centres and delivery partners on serious incident reporting through a reporting structure and clear policy.
The Award Centre/Delivery Partner :	To document and determine all serious incidents that need reporting to the NAO, and have a method of keeping track of all incidents that don't get reported to the NAO. They should also have appropriate methods for complying with the annual statistical reporting requirements of the NAO.

### 3. Process development and implementation

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**3.1.** The NAOs quality management framework needs to be built upon the understanding of quality assurance that this toolkit has outlined. The NAO should use the below templates as tools to develop and implement their own key processes.

#### **3.2. Performance management;**

3.2.1. *The NAO must have a performance management system – including use of continuous improvement tools – in place for managing Board, Staff, volunteers and relevant sub-licences.*

#### **3.3. Appraisal and evaluation of the Chair, Board Members and the Board as a whole**

3.3.1. The Chair of the Board must have a document that describes their role. This document forms the basis of the Chairs evaluation by the Trustees and senior staff (e.g. National Director). The Board need to consider how this evaluation fits into the wider assessment of the Board's governance ability.

3.3.2. Regular review of both individual Board member's performance and of the Board as a whole is important to highlight areas that can be improved. One way to identify how a Board and its members can improve is to ask the board members to compare their own performance in relation to their roles on the Board. As well as the overall performance of the Board in relation to its governance of the NAO.

## 4. Appendices

4.2. Below are example templates of certain documents you can start to use to implement processes of quality management. These templates are guidance documents which will need to be adapted to fit your NAOs needs and in order to meet relevant national legislation.

### 5. Appendix one:

EXAMPLE DOCUMENT:

#### Chairs Performance Evaluation

Purpose of evaluation:

Length of service:

End of service:

Last review:

Next review:

	Strongly Agree	Agree	Neither disagree or agree	Disagree	Strongly disagree
The Chair is an effective leader of the board, ably demonstrating the skills and experience necessary for the role.					
How might Performance be improved?					
The Chair ensures that the NAO sets strategic objectives that articulate the vision and ethos of the Award.					
How might Performance be improved?					
The Chair effectively conducts the appraisals of the Board Members and the National Director and sets proposed targets for the coming year.					
How might Performance be improved?					

Further areas of evaluation to be included by the NAO					
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## 6. Appendix two

EXAMPLE DOCUMENT:

### Board Member Self-assessment Questionnaire

Position:

Purpose of evaluation:

Length of service:

End of service:

Last review:

Next review:

Topics that should be covered, with set statements related to that topic	Either a scaling of 0-5 of strongly disagree-strongly agree
Structure of the Board	
<p>Example statements:</p> <ul style="list-style-type: none"> <li>Board has the right number of members</li> <li>Board has the right number of meetings per year</li> <li>Board meetings are well organised and planned</li> <li>Board has the right committees</li> </ul>	<p>0      1      2      3      4      5 or</p> <p>Strongly agree – Strongly disagree with a number of options in between</p>
Board accountability	
<p>Example statements</p> <ul style="list-style-type: none"> <li>Board effectively uphold the core terms of the licence with the Foundation</li> <li>Board effectively represents the organization</li> <li>Board review the budgets regularly and monitor progress throughout the year</li> </ul>	<p>0      1      2      3      4      5 or</p> <p>Strongly agree – Strongly disagree with a number of options in between</p>

<ul style="list-style-type: none"> <li>• Board review the strategic plans and regularly monitor progress throughout the year</li> <li>• Board evaluate and support ND adequately</li> <li>• Board have succession plans in place for the ND and Chair</li> <li>• Board members spend sufficient time learning about the NAOs</li> </ul>	
<p>Board Committee Performance</p>	
<p>Example statements</p> <ul style="list-style-type: none"> <li>• The Committee structure logically addresses the NAO's areas of operation</li> <li>• All committees have adequate agendas and minutes for each meeting</li> </ul>	<p>0      1      2      3      4      5 or</p> <p>Strongly agree – Strongly disagree with a number of options in between</p>
<p>Board member own review of performance</p>	
<p>Example statements</p> <ul style="list-style-type: none"> <li>• Member has a full and common understanding of their role and responsibilities within the board</li> <li>• Member feels confident in understanding the NAOs structure and mission</li> <li>• Member contributes fully to the functions of the Board and NAO</li> <li>• Member places the best interests of the NAO above those of themselves</li> </ul>	<p>0      1      2      3      4      5 or</p> <p>Strongly agree – Strongly disagree with a number of options in between</p>
<p>Evaluation of ND</p>	
<p>Example statements</p> <ul style="list-style-type: none"> <li>• ND is effective at optimising the work of the staff team to achieve the strategic aims of the NAO</li> <li>• ND effectively manages the performance of the staff team</li> </ul>	<p>0      1      2      3      4      5 or</p> <p>Strongly agree – Strongly disagree with a number of options in between</p>

## 7. Appendix Three

EXAMPLE DOCUMENT:

### Evaluation of the Board

Purpose of evaluation:

Last review:

Next review:

Topic: Strategic Direction

	Strongly Agree	Agree	Neither disagree or agree	Disagree	Strongly disagree
Board Members share a common vision of what is best for the NAO.					
How might Performance be improved?					
The Board thinks and acts strategically.					
How might Performance be improved?					
The Board reviews and evaluates the NAOs achievements alongside their strategy and the Association's Global Strategy.					
How might Performance be improved?					
Further areas of evaluation to be included by the NAO					

Topic: Board Structure and Processes

	Strongly Agree	Agree	Neither disagree or agree	Disagree	Strongly disagree
Every Board member has signed the Code of Conduct and regularly declares their register of interest.					
How might Performance be improved?					

Committees are appropriately sized, include the right member and have clear responsibilities.					
How might Performance be improved?					
Board meeting are generally effective?					
How might Performance be improved?					
Further areas of evaluation to be included by the NAO					

Topic: Board relationship with the NAO/National Director

	Strongly Agree	Agree	Neither disagree or agree	Disagree	Strongly disagree
The Board is aware and upholds the licence requirements they hold with the Foundation					
How might Performance be improved?					
All Board members understand the process for evaluating the NAOs/NDs performance.					
How might Performance be improved?					
The Board received timely information that is sufficient for it to monitor operational performance					
How might Performance be improved?					
Further areas of evaluation to be included by the NAO					

## 8. Appendix four

### EXAMPLE DOCUMENT

#### Template Generic licence review form

Core Standard (a)	Award Centre Comment (b)	NAO Reviewer's Comment (c)	Green
			Amber
			Red
			(d)
<p><b>1. Award Principles and National Legislation</b> The Award Centre must comply with:</p> <p>1.1 the <b>Fundamental and Operational Principles of the Award</b> and the <b>Code of Practice</b>; and</p> <p>1.2 the national legislation. In the event of any conflict between an Award Centre policy, document or guidance and a NAO policy, document or guideline, the Award Centre shall comply with whichever sets a higher standard or level of protection.</p>			
<p><b>2. Award Management</b> The Award Centre will:</p> <p>2.1 take every reasonable measure to deliver the Award in accordance with the NAO's requirements, and not to deviate from the licence Standards;</p> <p>2.2 have an Award Policy, signed by a member of the Senior Management which shows the</p>			

Core Standard (a)	Award Centre Comment (b)	NAO Reviewer's Comment (c)	Green
			Amber
			Red
			(d)
<p>understanding of the <b><u>Fundamental and Operational Principles</u></b> of the Award and commitment to the strategic aims, vision and values of the NAO;</p> <p>2.3 not advertise, or recruit or enrol Participants who are not formally associated with the Award Centre or establish any organisation for delivering the Award (outside of the Award Centre);</p> <p>2.4 appoint an [Award Coordinator] to be responsible for the operation of the Award within the Award Centre. On the departure of the [Award Coordinator], the name of his or her successor must be notified promptly to the NAO;</p> <p>2.5 provide clear role descriptions and responsibilities for key personnel delivering the Award, in accordance with [any guidance provided by the NAO to the Award Centre]; and</p> <p>2.6 ensure all Awards submitted for authorisation are compliant with the guidance and expectations of the NAO.</p>			
<p><b>3. Quality and Impact</b></p> <p>3.1 The Award Centre will submit to the NAO a report in accordance with the [NAO's guidelines]</p>			

Core Standard (a)	Award Centre Comment (b)	NAO Reviewer's Comment (c)	Green
			Amber
			Red
			(d)
<p>and any research initiative aims to measure the outcomes and impacts of the Award.</p> <p>3.2 The Award Centre agrees that the NAO may publish all or parts of the report contemplated in clause 3.1 in perpetuity, and the Award Centre warrants that by doing so the NAO will not infringe any third party's rights.</p> <p>3.3 The Award Centre will provide all co-operation materials and information to the NAO as reasonably requested.</p> <p>3.4 The NAO at its own expense will carry out a review into the Award Centre's compliance with this Licence and its adopted Quality Assurance Mechanism, including onsite inspections of the Award Centre's premises on reasonable notice.</p>			
<p><b>4. Adults delivering the Award</b></p> <p>4.1 The Award Centre must adhere to the NAO's <b><u>Adults Delivering the Award Policy</u></b>, as approved by the Foundation.</p> <p>4.2 All adults working directly with young people must be:</p>			

Core Standard (a)	Award Centre Comment (b)	NAO Reviewer's Comment (c)	Green
			Amber
			Red
			(d)
<p>4.2.1 16 yrs+ and/or consistent with the minimum age stipulated by national legislation;</p> <p>4.2.2 Fully trained based on the NAO's stipulated requirements;</p> <p>4.2.3 Appropriately vetted, based on the NAO guidelines and national legislation;</p> <p>4.2.4 have signed a volunteers Code of Conduct.</p>			
<p><b>5. Section Activities</b> The Award Centre will ensure that all Section Activities including Adventurous Journey Section Activities meet the requirements of the NAO, the latest edition of the <b><u>International Award Handbook for Award Leaders</u></b> [or NAO specific handbook] and relevant guidance materials available on the <b><u>Award Community (or relevant NAO online guidance materials)</u></b>.</p>			
<p><b>6. Liability and Insurance</b></p> <p>6.1 The Award Centre will have and maintain reasonable and proper insurance in respect of its delivery of the Award and its obligations under this Licence.</p>			

Core Standard (a)	Award Centre Comment (b)	NAO Reviewer's Comment (c)	Green
			Amber
			Red
			(d)
<p>6.2 If the Award Centre cannot maintain appropriate insurance, it will immediately notify the NAO in writing and the NAO may terminate this Licence immediately.</p> <p>6.3 The Award Centre will not act in a manner that will bring the NAO, the Foundation or the Brand into disrepute.</p> <p>6.4 The Award Centre acknowledges that this Licence is with the NAO (and not the Foundation), and that the Foundation is not responsible to, nor should be held liable by, the Award Centre for the performance of this Licence by the NAO or any losses related to this Licence or the Award.</p> <p>6.5 The Award Centre agrees to indemnify the NAO and the Foundation from and against all claims, costs, loss, liabilities and demands (unless resulting from the negligence of the party claiming under the indemnity), which arise out of the act, breach, omission or negligence of the Award Centre, its agents or its sub-contractors in relation to this Licence and/or the Award.</p>			
<p><b>7. Safeguarding and compliance with National Legislation</b> The Award Centre will:</p>			

Core Standard (a)	Award Centre Comment (b)	NAO Reviewer's Comment (c)	Green
			Amber
			Red
			(d)
<p>7.1 The Award Centre must establish and maintain appropriate Safeguarding, Child Protection and Health and Safety policies that are consistent with and reflect all relevant national and international legislation.</p> <p>7.2 The Award Centre, as a minimum requirement, must ensure that the Safeguarding and Child Protection Policy is consistent with the <b>NAO Safeguarding Policy</b>.</p> <p>7.3 In compliance with the <b>NAO Serious Incident Reporting Policy</b>, the Award Centre must report any serious incident, complaint and possible legal claim as per the NAO's policy.</p>			
<p><b>8. Brand and Visual Identity</b></p> <p>The Award Centre must comply with the <b>[NAO Branding Guidelines]</b> when using the Name, Logo and Materials as per Schedule [insert schedule number]</p>			
<p><b>9. Financial Obligations</b></p> <p>9.1 The Award Centre must maintain a sustainable funding plan for continued delivery of the Award.</p> <p>9.2 The Award Centre will adhere to the [NAO's guidance] regarding the charges of fees for participants.</p>			

Core Standard (a)	Award Centre Comment (b)	NAO Reviewer's Comment (c)	Green
			Amber
			Red
			(d)
9.3 The Award Centre agrees to comply with [Payment Terms] as stipulated by the NAO at its absolute discretion (if fees are charged to participants).			
<p><b>10. Data Records &amp; Information [for NAOs using the ORB]</b></p> <p>10.1 The Award Centre must use the Online Record Book ("ORB") to administer and deliver the Award, as well as any other systems and technology provided by the NAO.</p> <p>10.2 The parties acknowledge and understand that each party will act as a separate independent controller with respect to any personal data:</p> <p style="padding-left: 40px;">10.2.1 entered into the ORB and/or generated by the ORB; and/or</p> <p style="padding-left: 40px;">10.2.2 otherwise shared between the parties for the purposes of the Award</p> <p>10.3 The Award Centre shall at all times comply with the NAO's Privacy Policy, as well as all applicable laws relating to the processing of personal data and data privacy ("<b>Data Privacy Laws</b>").</p>			