



# QAHE Limited

# Anti-Bribery Policy

Prepared by: Chief Governance & Transformation Officer

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## 1. Introduction

QAHE Limited (“QA Higher Education”) is a part of the QA Group. As part of a wider group structure, we operate a comprehensive framework of policies designed to safeguard our institution and uphold the highest standards of integrity, this is our Counter Fraud Framework (the “Framework”).

Across the QA Group, we maintain and regularly update a suite of policies that work together as a framework which enables us to operate in a manner which is consistent, strengthens our resilience to fraudulent activity, and supports a robust culture of accountability and transparency.

QA Higher Education operates a comprehensive Framework designed to prevent, detect, and respond to fraud. This Framework includes risk identification, proportionate controls, governance oversight, a formal fraud risk register, and a structured response plan. The Framework explicitly addresses risks relating to public funds, including student finance, regulatory reporting, and funding eligibility.

Our Counter Fraud Framework policies are:

- Corporate Crimes Policy
- Counter Fraud and Error Policy
- Sanctions Policy
- Anti-Facilitation of Tax Evasion Policy
- Anti-Money Laundering Policy
- Conflict of Interest Policy
- Anti-Bribery Policy
- Whistleblowing Policy
- Gifts and Hospitality Policy
- Fraud Response Plan
- Financial Regulations
- Delegation of Authority

Each policy sets out roles, responsibilities, and how the QA Group works together to ensure veracity around this framework. The Counter Fraud Framework policies are underpinned by the Fraud Response Plan.

QA Higher Education is committed to the responsible use of our finances and resources and strives to maintain transparent and accountable working practices. This commitment underpins our Anti-Bribery Policy.

Providing best value and ensuring that decisions are taken transparently and clearly, are key principles for QA Higher Education and we are committed to maximising our resources for the benefit of our staff and student community. As an institution and as individuals, we have a duty to ensure that all our dealings are conducted to the highest standards of integrity.

This Policy supports the integrity and lawful use of public funds in line with regulatory expectations, including OfS Condition E8 and the OfS Public Interest Governance Principles and forms part of QA Higher Education’s “reasonable procedures” under the Bribery Act 2010. This Policy operates alongside key governing documents, including the Delegation of Authority and Financial Regulations, as part of QA Higher Education’s overall governance framework.



## 2. Purpose

In accordance with our Framework, the Anti-Bribery Policy (the “Policy”) applies to all employees of QA Higher Education, students, and those who we may outsource our services to or who may perform services on behalf of QA Higher Education including temporary workers, consultants, contractors, agents, and sub-agents, and subsidiaries, (“associated persons”) within the UK and overseas and outlines our approach on preventing bribery or corruption, in compliance with the Bribery Act 2010.

We always want to conduct our business to the highest legal and ethical standards and not be party to corruption or bribery.

QA Higher Education will not accept any form of bribery or corruption by, or of, our employees, agents, consultants or any person or body acting on our behalf. It would damage our reputation and expose us, our employees and representatives, to the risk of fines and imprisonment.

We take a zero-tolerance approach to bribery and corruption by our people and our third-party representatives. The Executive Board is responsible for implementing, maintaining, and reviewing effective systems of risk management and internal control to prevent, detect, and respond to bribery and corruption.

Any breach of this Policy may cause serious damage to the reputation and standing of QA Higher Education. QA Higher Education may also face criminal liability for unlawful actions taken by its employees or business partners under the Bribery Act 2010.

All employees and associated persons need to familiarise themselves and observe this Policy, including any future updates that may be issued from time to time.

We have identified certain aspects of our business where we are presented with a higher risk than others. These include:

- a) gifts and hospitality
- b) facilitation payments
- c) agents and intermediaries
- d) commissions
- e) charitable and political

### 2.1. Bribery Act 2010

QA Higher Education is committed to meeting the requirements of the Bribery Act 2010 which came into force on 1 July 2011.

The Bribery Act 2010 states that a bribe is a financial or other type of advantage that is offered or requested with the:

- intention of persuading or rewarding improper performance of a function or activity; or
- knowledge or belief that accepting such a reward would result in the dishonest performance of such a function or activity.

A relevant function or activity includes public, state, or business activities or any activity performed in the course of a person’s employment. This will include on behalf of another



company or individual, where the person performing that activity is expected to perform it in good faith, fairly, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if:

- an employee or associated person acting for, or on behalf of, QA Higher Education offers, promises, gives, requests, receives or agrees to receive bribes; or
- an employee or associated person acting for, or on behalf of, QA Higher Education offers, promises or gives a bribe to a foreign public official, with the intention of influencing that official in the performance of their duties (where local law does not permit or require such influence)

QA Higher Education is committed to maintaining adequate procedures designed to prevent bribery by our employees and associated persons, in line with the requirements of the Bribery Act 2010.

## 2.2. Definitions of Bribery and Corruption

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption. It includes offering, promising, giving, accepting or seeking a bribe. A bribe is a financial or other advantage, promised, requested or given to induce a person to perform a relevant function or activity improperly, or to reward them for doing so.

In practical terms, a financial or other advantage, is likely to include cash or cash equivalent, gifts, meals, entertainment, services, loans, preferential treatment, discounts or anything else of value.

The timing of the bribe is irrelevant, and payments made after the relevant event will still be caught, as will bribes that are given or received unknowingly. It is not necessary for the individual or institution to receive any benefit as a result of the bribe.

All forms of bribery and corruption are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with the Legal Team in the first instance.

This means that you must not:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received, or to reward any business received
- accept any offer from a third party that you know, or suspect is made with the expectation that we will provide a business advantage for them or anyone else

## 2.3. Acting with integrity – benefits and consequences

*The following table sets out some of the benefits of acting with integrity and some of the possible consequences of not acting with integrity:*

Benefits of acting with integrity	Consequences of not acting with integrity
Increased chances of being selected as a supplier in public and private sectors	A business that pays or accepts bribes is not in control of its dealings and is at risk of blackmail
Other businesses will want to work with us	If the business is found guilty of bribery, or if it fails to put in place proper procedures to prevent it, it could be subject to large fines
Remain in good standing with our banks and own suppliers	Any person guilty of bribery will be subject to fines and/or imprisonment (up to ten years under BA 2010)



Protected reputation	An allegation of bribery or corruption would result in severe reputational damage  The cost of our insurance cover could increase very significantly  Banking or supply facilities might be withdrawn or offered only on less favourable terms  Being blacklisted for tendering for private and public sector contracts  Good people will not want to work for us
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### 3. Employee Responsibility

It is our employee's responsibility not to offer, promise, give, solicit or accept any bribe. The bribe might be cash, a gift or other incentive to, or from, any person or company, whether a public or government official, official of a state-controlled industry, political party or a private person or company. Regardless of whether our employee or associated person is situated in the UK or overseas.

The bribe might be made to make sure that a person or company dishonestly performs duties or functions (for example, by not acting impartially or in good faith or in line with their position of trust).

The bribe might be made to gain a commercial, contractual or regulatory advantage for QA Higher Education in either gaining or continuing QA Higher Education business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This also applies to indirect contributions, payments or gifts made as an incentive or reward for dishonest performance, for example through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

### 4. Records

QA Higher Education maintains accurate, complete, and auditable records in respect of all financial transactions and associated activities, in line with its commitment to integrity and transparency. This includes, but is not limited to, records supporting:

- financial transactions and approvals;
- regulatory and statutory returns;
- student data submissions (whether to partner universities or other regulatory bodies);
- attendance and engagement monitoring; and
- funding, tuition fee, and eligibility claims.

All records must be prepared honestly, accurately, and in good faith. Any deliberate



falsification, manipulation, misrepresentation, or omission of information, including data submitted to regulators, funding bodies, or other external stakeholders, is strictly prohibited.

Such behaviour may constitute fraud, bribery, or corruption, particularly where it is intended to secure financial or other advantage for QA Higher Education or any individual.

QA Higher Education implements proportionate and risk-based financial and data controls, including segregation of duties, delegated approval limits, and audit processes, to mitigate the risk of bribery and corruption.

All records relating to contracts, financial transactions, and business activities must be maintained in accordance with QA Higher Education's internal procedures and retained to support audit and assurance requirements.

Contractual arrangements and legal commitments must be reviewed and approved in line with QA Higher Education's legal and procurement procedures, including referral to the Head of Legal where required.

Employees must exercise appropriate due diligence before entering into any arrangement with third parties, including suppliers, agents, consultants, or representatives, in accordance with QA Higher Education's procurement and risk management procedures and the Delegation of Authority.

Cost Centre Managers are responsible for ensuring that employees within their area understand this Policy and comply with requirements relating to record-keeping, gifts and hospitality, and anti-bribery controls. Any concerns should be escalated in line with the reporting procedures set out in this Policy.

## **5. Monitoring**

QA Higher Education monitors compliance with this Policy through a combination of risk management processes, internal controls, and assurance activities, including periodic review of:

- financial controls,
- data integrity, and
- regulatory reporting processes (including student-related data returns and funding claims).

### **6.1 Fraud Risk Management**

QA Higher Education maintains a formal Fraud Risk Register to identify, assess, and manage bribery and corruption risks across the institution. Fraud risk management forms a core component of the institution's governance and internal control framework.

Significant bribery and corruption risks are escalated through QA Higher Education's governance structure, including the Executive Board, Audit and Risk Committee, and ultimately the Board of Directors, in line with established risk reporting requirements.

QA Higher Education maintains a formal Fraud Risk Register to identify, assess, and manage bribery and corruption risks across the institution.



Bribery and corruption risks are:

- Assessed regularly as part of QA Higher Education's wider risk management processes
- Reviewed to reflect changes in operations, geographies, and regulatory expectations
- Assigned to named risk owners who are responsible for implementing and maintaining effective controls

The Fraud Risk Register is integrated with the broader Counter Fraud Framework and is subject to periodic review by the Executive Board to ensure that mitigating actions remain effective and proportionate.

The Audit and Risk Committee provide independent oversight and must be satisfied that the Fraud Risk Register and associated controls are robust, appropriately managed, and aligned with the institution's risk appetite.

## 6.2 Assurance

QA Higher Education operates a structured assurance framework to evaluate the effectiveness of its fraud prevention controls. This includes:

- Internal audit reviews aligned to key fraud risks
- Data validation and reconciliation processes, particularly relating to student and financial data
- Compliance monitoring across key business processes
- Periodic reporting of fraud risk metrics, incidents, and control effectiveness to senior management and the Audit and Risk Committee
- This framework ensures that controls are operating effectively and supports continuous improvement.

## 6.3 Mandatory Training

Completion of mandatory training is monitored by the People Team and reported to the Executive Board to ensure compliance and to the Audit and Risk Committee for oversight and assurance. Non-completion is followed up and may be escalated in line with internal procedures.

Training content is reviewed periodically to ensure it remains relevant, proportionate, and aligned with current legal and regulatory requirements. Individuals with responsibilities under this framework are appropriately skilled and supported through training and governance structures, and additional or role-specific training may be provided where higher bribery and corruption risks are identified.

## 6.4 Governance and Oversight

Overall accountability for this Policy and QA Higher Education's Counter Fraud Framework sits with the Board of Directors.

The Chief Financial Officer is the executive owner of this Policy, supported by the Head of Legal.

The Executive Board is responsible for the implementation, operation, and periodic review of this Policy and associated controls, ensuring that bribery and corruption risks are effectively identified, assessed, and managed in line with QAHE's Risk and Opportunity Management Framework.



The Audit and Risk Committee provide independent oversight of QA Higher Education's arrangements for the prevention, detection, and management of bribery and corruption. The Committee reviews risk exposures, control effectiveness, and assurance activity and must be satisfied that appropriate systems of internal control are in place and operating effectively.

The Board of Directors retains ultimate responsibility for ensuring that effective governance arrangements are in place and that QA Higher Education complies with its legal and regulatory obligations, including those relating to bribery and corruption.

Independent assurance over the effectiveness of controls is provided through internal audit or equivalent review activity, with findings reported to the Audit and Risk Committee.

As part of the wider Framework this Policy is aligned with QA Higher Education's risk management, internal control, and assurance processes. Fraud risk management forms a core component of QA Higher Education's governance and internal control framework.

## **6. Incident Reporting and Management**

QA Higher Education recognises that the giving and receiving of gifts and genuine hospitality where nothing is expected in return, helps form positive relationships with third parties, where it is in proportion, reasonable, properly recorded and signed off by the relevant finance team business partner.

QA Higher Education will not approve gifts, business entertainment proposals or promotions where it considers that a conflict of interest may arise or where it could be observed that too much influence or a particular business benefit was being sought. This includes concerns relating to the manipulation of data, student records, or funding-related submissions.

### **6.1. Gifts Given**

QA Higher Education occasionally provides gifts aimed at thanking customers and suppliers for their custom and loyalty, but which also are:

- for the purpose of establishing or maintaining good business relationships
- to improve the image and reputation of QA Higher Education or
- to present QA Higher Education's services effectively

Employees and, where relevant, associated persons must present requests for gifts well in advance of any proposed dates to the cost centre manager. The employee or associated person must supply the cost centre manager with details of the objective of the proposed gift. Other details that must be provided include the identity of those who will be receiving the gift, the organisation that they represent, and the details and basis of the proposed gift.

QA Higher Education will approve gift proposals only if they demonstrate a clear business need and are appropriate for the nature of the business relationship. Any gift must be arranged in good faith by employees, and must not be offered, promised or accepted to secure an advantage for QA Higher Education, or to influence the impartiality of the receiver.

All gifts up to the value of £50 per person can be authorised by the cost centre manager. Gifts up to £150 per person can be authorised by the Executive lead and for Agents the Chief Commercial Officer. Gifts over £250 per person must be approved by the Chief Financial Officer.

All gifts, however small, must be:

- a) reported to the Head of Legal who will keep a record of such gifts; and



- b) all gifts exceeding the value of £50 per person must be declared on the [Gifts and Hospitality Register Form](#) under the Governance Hub on the [Intranet](#).

## 6.2. Gifts Received

From time to time customers, suppliers, or other people might offer a gift to an employee.

All gifts up to the value of £50 per person can be authorised by the cost centre manager. Gifts up to £150 per person can be authorised by the Executive lead and from Agents the Chief Commercial Officer. Gifts over £250 per person must be approved by the Chief Financial Officer.

All gifts, however small, must be:

- c) reported to the Head of Legal who will keep a record of such gifts; and
- d) all gifts exceeding the value of £50 per person must be declared on the [Gifts and Hospitality Register Form](#) under the Governance Hub on the [Intranet](#).

## 6.3. Hospitality Given

QA Higher Education occasionally runs hospitality events mainly aimed at thanking customers and suppliers for their custom and loyalty, but which also are:

- a) for the purpose of establishing or maintaining good business relationships
- b) to improve the image and reputation of QA Higher Education or
- c) to present QA Higher Education's services effectively

Employees and, where relevant, associated persons must present requests for hospitality and promotional expenses well in advance of any proposed dates to the cost centre manager. The employee or associated person must supply the cost centre manager with details of the objective of the proposed client entertainment or expenses. Other details that must be provided include the identity of those who will be attending, the organisation that they represent, and the details and basis of the proposed activity.

QA Higher Education will approve business entertainment proposals only if they demonstrate a clear business need and are appropriate for the nature of the business relationship. Any hospitality event must be arranged in good faith by employees or associated persons, and must not be offered, promised or accepted to secure an advantage for QA Higher Education, or to influence the impartiality of the receiver.

All hospitality given up to a value of £250 can be authorised by the cost centre manager. Hospitality with a value of £250 or over per person must be approved by the Chief Financial Officer.

All invitations must be:

- a) reported to the Head of Legal who will keep a record of such invitations; and
- b) all hospitality events exceeding the value of £250 per person must be declared on the [Gifts and Hospitality Register Form](#).

## 6.4. Hospitality Received

From time to time, customers, suppliers, or other people might invite an employee to a hospitality event.

All hospitality received up to a value of £250 can be authorised by the cost centre manager. Hospitality with a value of £250 or over per person must be approved by the Chief Financial Officer.



All invitations must be:

- c) reported to the Head of Legal who will keep a record of such invitations; and
- d) all hospitality events exceeding the value of £250 per person must be declared on the [Gifts and Hospitality Register Form](#).

## 7.5 General Note

In certain situations, it may not be suitable to keep such gifts or be provided with entertainment. Employees and associated persons may be asked to return the gifts to the sender, or refuse the entertainment, for example where there could be a real or supposed conflict of interest.

As a general rule, small tokens of appreciation (such as flowers or a bottle of wine) may be retained by employees, provided they are low value items.

If someone makes an offer that could influence an employee or associated person's judgement or lead to a conflict of interest, they must not accept it. Any employee or associated person who has concerns on this should report them to the cost centre manager.

## 7. Agents

Agent and partner gifts may be issued as part of our broader engagement strategy, recognising contributions and fostering strong relationships. These must always align with QA Higher Education's financial integrity and anti-bribery standards. Gifts must be:

- modest in value and appropriate to the context
- never be offered with the expectation of a business advantage
- not be linked, directly or indirectly, to student recruitment outcomes, admissions decisions, funding eligibility, or any activity that may affect the access to or use of public funds
- recorded accurately in accordance with section 7.

## 8.1 Agent Gift Approval

All gifts under £50 must be pre-approved by the level 2 workflow approver. Where a gift is over £50, or where the gift is given by the level 2 workflow approver, it must be approved by the relevant Executive lead. Supporting documentation must include:

- Purpose of the gift which should also be documented in the expense claim
- Recipient details
- Value and description
- Approval trail to be uploaded along with receipts on any expense claim

## 8.2 Agent Compliance Requirements

As outlined in the Agent and Representative Code of Conduct:

- Agents must not offer or accept gifts that could be perceived as inducements.
- All transactions must comply with the UK Bribery Act 2010 and QAHE's anti-corruption policies
- All gifts either given or received with a value exceeding £50 must be recorded on the Gifts and Hospitality Register.
- All hospitality, either given or received exceeding the value of £250 per person, must be declared on the Gifts and Hospitality Register.
- All agent and partner hospitality given or received with a value of £250 or over per person must be approved by the Chief Commercial Officer.



## 8.3 Monitoring and Reporting

Spot checks will be conducted regularly by Finance and the Chief Commercial Officer to ensure compliance, and any irregularities must be reported to the Finance team immediately. Identified issues are escalated and considered within QAHE's Fraud Risk Register where relevant and reported through established governance channels, including the Audit and Risk Committee.

## 8. Procedure for the proposed hospitality and promotional expenses

Hospitality and promotional expense requests should be submitted well in advance of proposed dates to the relevant cost centre manager.

Cost centre managers will be authorised to approve requests up to the value of £250, with requests exceeding this requires Chief Financial Officer approval.

Employees are required to set out in writing:

- the purpose of the proposed client entertainment or expenses
- the identity of those who will be attending
- the organisation that they represent and
- details and basis of the proposed activity.

QA Higher Education will approve business entertainment proposals only if they demonstrate a clear business objective and are suitable for the nature of the business relationship.

QA Higher Education will not approve business entertainment where it considers that a conflict of interest may arise. This will also apply where it could be observed that inappropriate influence or a particular business benefit was being pursued (for example before a tender exercise).

Any gifts, rewards, or entertainment received or offered from clients, public officials, suppliers, or other business contacts must be reported immediately to the relevant cost centre manager and/or Executive lead.

In certain situations, it may not be suitable to keep such gifts or be provided with entertainment. Employees and associated persons may be asked to return the gifts to the sender, or refuse the entertainment, for example, where there could be a real or supposed conflict of interest.

## 9. Facilitation payments

### 9.1. Principle

QA Higher Education discourages its employees or associated persons from making or accepting any facilitation payments.

These are payments made to government officials for carrying out or speeding up routine procedures. They are more common overseas.

Facilitation payments are different from an official, publicly available fast-track process. Facilitation payments, or offers of such payments, are a criminal offence by both the individual concerned and the organisation under the Bribery Act 2010.



This is even where such payments are made or requested overseas. Employees and associated persons are required to act with greater care when dealing with government procedures overseas.

## **9.2. Procedure**

Where a public official has requested payment, employees or associated persons should ask for further details of the purpose and nature of the payment in writing. If the public official refuses to give this, this should be reported immediately to the relevant cost centre manager and Executive lead.

If the public official provides written details, the relevant Executive lead will consider the nature of the payment. Local legal advice may be required by the organisation.

If it is decided that the payment is a legitimate fee, for example part of a genuine fast-track process, or is permitted locally, the Executive lead will authorise the employee to make the payment.

Where the relevant Executive lead considers that the request is for a facilitation payment, the employee or associated person will be instructed to refuse to make the payment. The employee or associated person must notify the public official that they are required to report the matter to QA Higher Education, as well as their organisation and the UK embassy.

QA Higher Education will seek the assistance of the relevant employees in its investigation and may decide that the matter should be referred to the prosecution authorities.

If an employee or associated person has any other concerns about the nature of a request for payment, they should report it to the relevant cost centre manager or Executive lead using the reporting procedure set out in this Policy.

All payments are to be recorded by the Head of Legal.

## **10. Employee Bonuses/Commissions**

Occasionally, QA Higher Education offers bonuses to its employees. Employees suitable for any bonuses must not make customers aware of any bonus or benefit that the employee may gain. Employees must not offer any share in such bonuses to any customer in return for the customer making the booking.

QA Higher Education reserves the right to withdraw or withhold bonuses/commissions, and commence disciplinary action, where employees may be acting in breach of this Policy.

### **10.1. Promotions**

QA Higher Education occasionally runs promotions for customers. Employees and, where this applies, associated persons must ensure that any such promotions must be made available to all customers on a fair and equal basis. Employees and, where relevant, associated persons, must not offer customers the chance of winning in return for a purchase.

## **11. Expenses**

Employees and, where this applies, associated persons must supply records and receipts, as explained in the QAHE's Expenses Policy.

Any expenses that give rise to concerns should be fully investigated and discussed with the authorised signatory and/or cost centre manager.



## 12. Donations to organisations, charities, or political parties

QA Higher Education occasionally makes donations to charity. These are processed by the Finance team. No employee should make donations on behalf of QA Higher Education without the prior approval of the Chief Financial Officer.

No donations should be made to charities, political parties or other organisations with the intention of gaining business advantage.

All payments are to be recorded by the Head of Legal.

## 13. Permitted Behaviour

The following behaviour is appropriate:

- normal and appropriate hospitality and entertainment with clients
- the use of any recognised fast-track process that is publicly available on payment of a fee
- any such practices must be in proportion, reasonable and made in good faith and clear records must be kept

## 14. Reporting Suspected Bribery

QA Higher Education depends on our employees and associated persons to make sure that the highest standards of ethical conduct are upheld in all our business dealings. Employees and associated persons are requested to assist QA Higher Education and to remain vigilant in preventing, detecting, and reporting bribery and corruption.

In a normal situation, our employees and associated persons are encouraged to report any concerns to your Line Manager first. If you are unable to raise your concern with your Line Manager because your concern is about them, or if they do not resolve the matter, you must raise your concern using any of the following channels:

- Head of Legal
- Chief Financial Officer
- Report your concern through the confidential whistleblowing helpline run by Safecall, an independent third-party provider.

If you prefer you can contact the whistleblowing helpline anonymously, the details of which are within section 16.

Issues that should be reported include:

- any suspected or actual attempts at bribery or corruption
- concerns that other employees or associated persons may be being bribed or corrupted or
- concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

Any such reports will be carefully investigated without delay by QA Higher Education in the strictest confidence. Employees and associated persons will be required to assist in any investigation into possible or suspected bribery.

Employees or associated persons who report instances of bribery will be supported by QA Higher Education. QA Higher Education will ensure that the individual does not face any disadvantage or unfavourable treatment as a result of their report. Any instances of disadvantage or unfavourable treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself



a disciplinary offence. If you are told not to raise or pursue any concern, even by a person in authority such as a manager, as employees and associated persons you should not agree to remain silent. You should report the matter to the relevant cost centre manager or Executive lead.

## 15. Whistleblowing Helpline

The confidential whistleblowing helpline is run by Safecall which is an independent third-party provider. It offers a service that enables employees and third-party suppliers to report malpractice, and/or unlawful or unethical behaviour within the workplace.

Safecall provides an independent confidential reporting line where you can raise your concerns and be assured that they will be fully addressed. Calls are handled by skilled employees and are treated in complete confidence, unless you choose to share your contact details.

You can contact Safecall at any time and details of the Safecall service are also available on the People Hub.

The Safecall service is available 24 hours a day, 7 days a week.

UK 0800 915 1571

Romania 0372 741 942

Switzerland 00 800 7233 2255

Italy 00 800 7233 2255

Australia 1 800 312 928

South Africa 0 800 990 243

US 1 866 901 3295

Spain 00 800 7233 2255

Alternatively, Safecall can be contacted via their website: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

For students there are a variety of ways in which concerns can be raised, depending on the nature of the concern, however, “Your SafeSpace” allows for anonymous reporting where students can raise their concerns directly – [Your Safe Space: Report + Support – Fill out form](#)

## 16. Action by QA Higher Education

In accordance with the Fraud Response Plan, QA Higher Education will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. QA Higher Education will apply its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. QA Higher Education may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, QA Higher Education who are found to have breached this Policy.

QA Higher Education may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office, and the police. QAHE will provide all necessary support to the relevant authorities in any subsequent prosecution.

QA Higher Education reserves the right to amend and update this Policy as required. For the



avoidance of doubt, this Policy does not form part of the employee's contract of employment.

QA Higher Education will monitor and review the operation of this Policy and related procedures on a regular basis, including reviews of internal financial systems, expenses, corporate hospitality, gifts, and entertainment policies.

Where you consider that you cannot report any concerns directly to your management team, we have put in place a whistleblowing hotline which is operated by Safe call (an independent third party). Further details can be found in the QA Group Whistleblowing Policy (available on PeopleHub).

Should you have any questions on the content of this Policy please reach out to the Legal Team – [qahelegaldepartment@qa.com](mailto:qahelegaldepartment@qa.com)

## **17. Training and Awareness**

QA Higher Education promotes a culture of integrity through regular communication and awareness activities, ensuring that all employees and associated persons understand their responsibilities under this Policy.

Mandatory training requirements, including monitoring and escalation of non-completion, are set out in Section 6.2. Training programmes support employees in understanding their responsibilities to prevent, detect and report fraud and risks relating to public funds.

## **18. Review**

This Policy will be reviewed every three years or sooner if required to ensure it remains accurate, effective, and aligned with legislation, regulatory, and institutional changes.

The Chief Financial Officer, as Policy Owner, is responsible for initiating and coordinating the review of this Policy in line with the Policy Framework.

