



QAHE Limited

Corporate Crimes Policy

Prepared by: Chief Governance & Transformation Officer

Prepared for: Board of Directors

Date: February 2026

Issue: 1





Version Control

Document Information	
VO1	Original draft of the Corporate Crimes Policy for Board approval.

Document Approval		
Board	Approval	Viewed / Comments / Date
QAHE Board of Directors	Approved	12 February 2026
		Approved

Revision History			
Version	Issue Date	Author	Description of Change
VO1	February 2026	Chief Governance & Transformation Officer	Policy based on the QA Group Corporate Crimes Policy. Policy amended for the structure of QAHE and for approval by the Board of Directors.





Contents

1. Introduction.....	4
2. Scope.....	5
3. What are Corporate Crimes?.....	6
4. Economic Crime and Corporate Transparency Act 2023.....	6
5. Fraud.....	7
5.1. Higher Education Fraud and Public Funds.....	7
6. Anti-Facilitation of Tax Evasion.....	8
7. Bribery and Corruption.....	8
8. Sanctions.....	8
9. Anti-Money Laundering (AML).....	8
9.1. AML Risk Assessment and Controls.....	9
9.2. Duty to Report and Consequences of Breach.....	9
10. Competition Law.....	9
11. Conflicts of Interest.....	9
11.1. Supplier and Customer Checks.....	9
11.2. Employee Responsibilities.....	10
11.3. Investigating Potential Conflicts.....	10
11.4. Addressing Conflicts of Interest.....	10
11.5. Disciplinary Action.....	10
12. Monitoring.....	10
12.1. Fraud Risk Management.....	11
12.2. Assurance.....	11
12.3. Mandatory Training.....	11
12.4. Governance and Oversight.....	11
13. Whistleblowing.....	12
14. Training and Awareness.....	13
15. Compliance.....	13
16. Review.....	13



1. Introduction

QAHE Limited (“QAHE”) 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 organisations 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.

Our 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 Framework policies are underpinned by the Fraud Response Plan.

QAHE is committed to the proper use of our finances and resources and endeavours to ensure transparent and accountable working practices.

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

The Corporate Crimes 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 QAHE’s “reasonable prevention procedures” under applicable legislation, including the Economic Crime and Corporate Transparency Act 2023.

The Corporate Crimes Policy operates alongside key governing documents, including the Delegation of Authority and Financial Regulations, as part of QAHE’s overall governance framework.

The Corporate Crimes Policy provides an overarching framework, with detailed requirements set out in the individual policies within the Framework.



2. Scope

In accordance with our Framework, the Corporate Crimes Policy (the “Policy”) applies to all employees of QAHE, students, and those who we may outsource our services to or who may perform services on behalf of QAHE including temporary workers, consultants, contractors, agents, and sub-agents, and subsidiaries, within the UK and overseas and outlines QAHE’s commitment to preventing, detecting, and responding to corporate crimes, ensuring compliance with key legislation in the UK.

3. What are Corporate Crimes?

Corporate crimes are illegal acts committed by a company or its representatives in the course of business operations. These offences often involve deception, abuse of power, or dishonest conduct for financial or commercial gain. They can cause harm to the business, its stakeholders, the economy, and society at large.

QAHE recognises the following as the principal forms of corporate crime:

Corporate Crime	Definition
Fraud	Deceptive actions intended to secure unlawful gain or cause loss to another party.
Bribery	Offering, giving, receiving, or soliciting something of value to improperly influence a decision.
Corruption	Abuse of entrusted power for private gain.
Money Laundering	Concealing, disguising, or legitimising the proceeds of crime.
Competition Law (Antitrust)	Activities that restrict competition or create monopolies.
Cartel Behaviour	Collusion among competitors to fix prices, rig bids, or divide markets.
Tax Evasion	Illegally avoiding payment of due taxes or facilitating such evasion.
Sanctions Violations	Breaching trade or economic sanctions and anti-money laundering regulations.
Conflicts of Interest	Situations where personal interests conflict with company duties, including supplier and customer relationships.

4. Economic Crime and Corporate Transparency Act 2023

The Economic Crime and Corporate Transparency Act 2023 (“ECCTA”) strengthens UK measures against economic crime and enhances corporate transparency. QAHE is fully committed to meeting its obligations under the ECCTA.

QAHE is part of the QA Group which ensures all directors and Persons with Significant Control (“PSC”) at QAHE complete identity verification before appointment or within required timeframes, through approved routes such as Companies House or Authorised Corporate Service Providers (“ACSPs”). QA Group maintains accurate PSC registers and registered office details, responding promptly to Companies House inquiries.



A Person of Significant Control Register is a record that shows who really owns or controls a company, even if they are not listed as a director.

Companies House's enhanced powers to query and reject suspicious filings are fully recognised, and QA Group comply with restrictions on corporate directors.

Furthermore, QAHE acknowledges that the new corporate offence of failing to prevent fraud is a key focus of the ECCTA. Further details and governance with respect to this can be found in our [QAHE Counter Fraud and Error Policy](#), available on our [QAHE Policy Hub](#).

5. Fraud

Fraud involves intentional deception to secure unfair or unlawful gain, encompassing false representation, failure to disclose information, and abuse of position. QAHE adheres to the relevant laws including, the ECCTA, to prevent, detect, and respond to fraudulent activity.

QA Group undertakes regular audits, risk assessments, and monitoring, on behalf of QAHE, to maintain financial integrity and compliance with applicable laws. Please refer to our [QAHE Counter Fraud and Error Policy](#) for further details.

5.1. Higher Education Fraud and Public Funds

As a provider operating within the UK higher education sector and subject to Office for Students ("OfS") regulation, QAHE recognises specific fraud risks associated with public funding and regulatory reporting.

Although QAHE is not in direct receipt of public funding, QAHE recognises that its provision forms part of a system supported by student finance through sub contractual arrangements and as such maintains a zero-tolerance approach to fraud relating to student data, public funding, and regulatory returns.

Key risk areas include:

- Student Eligibility Fraud: Misrepresentation of identity, qualifications, or residency status to access education or funding.
- Attendance and Engagement Fraud: False recording or manipulation of student participation data.
- Retention and Progression: Artificial inflation or misreporting of continuation, completion, or achievement outcomes (whether to partner universities or other regulatory bodies).
- Data Returns: Inaccurate or misleading submissions to our partner, OfS, or other regulatory bodies.
- Student Loans Company ("SLC") Funding: Incorrect claims or misuse of tuition fee funding.

QAHE implements targeted controls to mitigate these risks, including data validation, internal audit review, and segregation of duties.

These risks are further managed through the [QAHE Counter Fraud and Error Policy](#) and associated data governance processes.

QAHE's fraud prevention framework is supported by a structured assurance model, including:

- Internal audit reviews aligned to key fraud risks
- Data validation and reconciliation controls



- Compliance monitoring across financial and operational processes
- Periodic independent assurance where required

These mechanisms provide assurance that controls are designed effectively and operating as intended.

6. Anti-Facilitation of Tax Evasion

Tax evasion is the illegal avoidance of tax payments through deception or fraudulent means. QAHE complies with the relevant laws, implementing controls to prevent and detect tax evasion. QAHE maintains transparency and full cooperation with tax authorities. Please refer to the [QAHE Anti-Facilitation of Tax Evasion Policy](#) for further details.

7. Bribery and Corruption

Bribery involves offering, giving, receiving, or soliciting something of value to improperly influence decisions or gain advantage. Corruption refers to the abuse of entrusted power for personal or commercial benefit.

We maintain a zero-tolerance approach to bribery and corruption.

Key measures include dedicated anti-bribery policies, risk assessments, third-party due diligence, and regular training programs. Please refer to our [QAHE Anti-Bribery Policy](#) for further details.

8. Sanctions

QAHE complies fully with applicable sanctions regimes. We are conscious that these are updated from time to time through different applicable laws and regulation. Sanctions violations, such as dealing with sanctioned entities or prohibited transactions, are strictly prohibited. We seek to maintain robust screening, monitoring, and reporting controls to ensure compliance. Please refer to the [QAHE Sanctions Policy](#) for further details.

9. Anti-Money Laundering (AML)

Money laundering involves concealing the origins of illegally obtained funds, often through complex transactions or legitimate businesses, typically in three stages: placement, layering, and integration.

QAHE is committed to preventing money laundering and terrorist financing in all its operations. Money laundering is the process of disguising the origin of illegally obtained funds, often through complex transactions or legitimate business activities, to make them appear lawful.

All employees and relevant parties are expected to conduct business with integrity and in compliance with applicable anti-money laundering laws and regulations. Upholding these standards is essential to protect both the integrity of our business and the wider financial system. Please refer to the [QAHE Anti-Money Laundering \(AML\) Policy](#) for further details.

9.1. AML Risk Assessment and Controls

To effectively prevent money laundering and terrorist financing, QAHE periodically conducts risk assessments across high-risk areas of business. e.g. accounts receivable and accounts payable. These assessments identify higher-risk areas and guide the implementation of appropriate controls to mitigate potential exposure.



Key measures include:

- **Customer Due Diligence:** Verifying the identity of clients, suppliers, and business partners before establishing a business relationship.
- **Enhanced Due Diligence:** Applying additional checks for higher-risk customers, transactions, or jurisdictions.
- **Ongoing Monitoring:** Reviewing transactions to detect unusual or suspicious patterns.
- **Suspicious Activity Reporting (SAR):** Promptly reporting any suspicion of money laundering to the Money Laundering Reporting Officer or equivalent contact.
- **Record Keeping:** Retaining verification and transaction records in compliance with statutory requirements.
- **Training:** Providing mandatory anti money laundering training to all relevant staff to ensure awareness of obligations and the ability to identify and escalate suspicious activity.

9.2. Duty to Report and Consequences of Breach

All employees are prohibited from engaging in, facilitating, or ignoring potential money laundering activities. Any suspicion of money laundering or terrorist financing must be reported immediately to the Chief Financial Officer (who will liaise with the Group Financial Controller), or through one of the channels set out in the Whistleblowing Policy.

10. Competition Law

Also known as antitrust, competition law governs activities that restrict market competition, such as price-fixing, bid-rigging, and market sharing.

QAHE complies with the relevant laws. We promote fair competition and prohibit cartel behaviour. All employees and contractors are required to avoid anti-competitive practices and report concerns.

Please refer to the [QA Group Competition Law Policy](#) for further information.

11. Conflicts of Interest

QAHE is committed to conducting its business with integrity, impartiality, and transparency. A **conflict of interest** arises when personal, financial, or other interests could compromise, or appear to compromise, the ability of an employee, officer, contractor, or business partner to act in the best interests of the company. Conflicts may be **actual, potential, or perceived**, and can occur in various contexts, including relationships with suppliers, customers, or competitors.

These conflict of interest terms are applicable to anyone (including employees, contractors, associates or other workers) within QAHE.

Please refer to the [QAHE Conflicts of Interest Policy](#) for further information.

11.1. Supplier and Customer Checks

As part of our due diligence process, QAHE conducts conflict-of-interest checks on all suppliers, see QAHE Supplier Governance Policy, and customers before engagement and periodically thereafter.

11.2. Employee Responsibilities

All employees interacting with suppliers and/or customers are prohibited to enter into dealings that result in any personal gain with any existing or potential supplier or customer.



All employees must promptly disclose any actual, potential, or suspected conflict of interest, whether their own or one they become aware of involving another person. Disclosures should be made to their line manager and Chief Governance & Transformation Officer. Examples include:

- Holding a financial interest in a supplier, customer, or competitor.
- Engaging in secondary employment that overlaps with company operations.
- Receiving personal benefits from third parties in connection with company business.

11.3. Investigating Potential Conflicts

When a possible conflict of interest arises, the Chief Governance & Transformation Officer will collect all of the pertinent information and may question any concerned parties. If the Chief Governance & Transformation Officer determines that a conflict exists, steps will be taken to address the conflict. If no conflict exists, the inquiry will be documented but no further action will be taken.

In making a determination the Chief Governance & Transformation Officer will liaise with the Head of Legal and Director of People.

11.4. Addressing Conflicts of Interest

When an actual conflict of interest is found, any transactions that may have been affected will be reviewed retroactively. Affected parties both within and outside of the business, including shareholders, directors, employees, and contractors will be notified. If appropriate, an investigation will also be conducted by the Chief Governance & Transformation Officer to determine the extent of the conflict and the intentions of the parties involved.

If the conflict in question involves a member or members of the Executive Team, such a member will be excused from the deliberations

11.5. Disciplinary Action

As all conflicts of interest will be reviewed on a case-by-case basis, a review may result in disciplinary action in accordance with the [QAHE Disciplinary Action](#).

12. Monitoring

QAHE monitors compliance with this Policy through a combination of risk management processes, internal controls, and assurance activities. This includes periodic reviews of:

- financial controls and transaction monitoring;
- tax compliance and reporting processes;
- data integrity;
- regulatory reporting processes (including student-related data returns, tuition fee records, and funding claims, whether to partner universities or other regulatory bodies including the OfS and SLC);
- third-party arrangements, including agents, contractors, and suppliers.

Monitoring activities are designed to detect and prevent the facilitation of tax evasion, including where this could impact public funding or regulatory reporting.



12.1. Fraud Risk Management

QAHE maintains a formal Fraud Risk Register, which identifies, assesses, and tracks corporate crime and fraud risks across the organisation. Fraud risk management forms a core component of the institution's governance and internal control framework.

Ownership: The Fraud Risk Register is owned by the Chief Financial Officer

Governance: It is reviewed regularly and formally reported to the Audit and Risk Committee.

Integration: The register is aligned with the Strategic Risk Register and informs the internal audit programme.

Review Cycle: Risks and controls are reviewed periodically to reflect emerging threats, regulatory changes, and operational developments.

12.2. Assurance

QAHE 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.

12.3. 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 and aligned to identified fraud risks and is supported by ongoing assurance activities, including monitoring completion rates, effectiveness assessments, and internal audit validation. 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 corporate crime risks are identified.

12.4. Governance and Oversight

Overall accountability for this Policy and QAHE's 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 QAHE's arrangements for the prevention, detection, and management of corporate crime risks. The Audit and Risk 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 the institution complies with its legal and regulatory obligations, including those relating to corporate crime risks.

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.

Fraud risk management forms a core component of QAHE's governance and internal control framework.

13. Whistleblowing

QAHE maintains a secure and confidential whistleblowing framework consistent with the applicable laws, including new ECCTA protections.

If you suspect any unethical, illegal, or unsafe conduct which is not in line with this Policy you must follow our [QAHE Whistleblowing Policy](#) which can be found on the [People Hub](#) on the [Policies & Forms Page](#). You can do this anonymously and you must make your report as soon as reasonably practicable. You may be required to explain any delays.

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

Alternatively, Safecall can be contacted via their website: 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](#)

14. Training and Awareness

QAHE promotes a culture of integrity through regular communication and awareness activities, ensuring that all staff understand their responsibilities under this Policy.

Mandatory training requirements, including monitoring and escalation of non-completion, are set out in Section 12.3. Training programmes support staff in understanding their responsibilities to prevent, detect and report fraud and risks relating to public funds.



15. Compliance

Failure to comply with this Policy puts both you and the business at risk. In some cases, you may commit a criminal offence if you fail to comply with this Policy. We take compliance with this Policy very seriously. Given the importance of this Policy, failure to comply with any requirement of this Policy may lead to disciplinary action under our procedures, which may result in dismissal.

16. 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 organisational changes.

The Policy owner is responsible for initiating and coordinating the review of this Policy in line with the Policy Framework.

