



# QAHE Limited

# Gifts and Hospitality Policy

Prepared by: Chief Governance & Transformation Officer

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## 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 Gifts and Hospitality 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 procedures” under the Bribery Act 2010 and to prevent fraud. The Gifts and Hospitality Policy operates alongside key governing documents, including the Delegation of Authority and Financial Regulations, as part of QAHE’s overall governance framework.

This includes controls relating to fraud risks associated with public funding and regulatory activity, including Student Loans Company (SLC) funding, tuition fee eligibility, attendance and engagement monitoring, and data submitted to regulators such as the Office for Students (OfS) and partner institutions.



These risks are formally captured within QAHE's Fraud Risk Register, which is maintained, reviewed, and reported to the Audit and Risk Committee as part of the institution's wider risk management and assurance framework.

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

It is important that the giving or receiving of gifts and hospitality can stand up to internal and public scrutiny and the Gifts and Hospitality Policy sets out the principles and requirements expected of you in offering and receiving gifts and hospitality.

## 2. Scope

In accordance with our Framework, the Gifts and Hospitality 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, ("Associated Persons") within the UK and overseas and outlines our approach to the management of Gifts and Hospitality both given and received.

This Policy does not apply to gifts and hospitality which QAHE offers to its own staff or Board of Directors (the "Board") (for example, Annual Staff Awards),

## 3. Definitions

Gift means the receipt or offer of any item of value, including any token of appreciation and gratitude, gift vouchers, cash, physical gifts (for example, a bottle of wine) or other items of value (for example, sports tickets) whether offered, given, or received.

Hospitality means any attendance at social events, conferences, functions, or other occasions, business lunches or drinks (whether they include a business purpose or not and whether received or offered) and any travel or accommodation provided in connection with the Hospitality.

## 4. Responsibilities

QAHE's Board has overall responsibility for this Policy. All staff at QAHE are responsible for implementing and upholding the principles of this Policy. QAHE sees this as a key policy, and oversight and monitoring of the effectiveness of its application is through the Audit and Risk Committee.

Cost centre managers are required to refer all authorised gifts and hospitality to the Head of Legal who will hold a Gifts and Hospitality Register. If cost centre managers are concerned by any actions, they should contact the Head of Legal who will review in the first instance and escalate if necessary. All staff can contact Safe Call anonymously if they feel they need to do so.

All staff are responsible for the success of this Policy and staff are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Chief Governance & Transformation Officer via [QAHE.Governance@qa.com](mailto:QAHE.Governance@qa.com)

The Chief Governance & Transformation Officer and Head of Legal are the main source of advice on the operation of this Policy and are responsible for:



- The communication of this Policy.
- Seeking assurance from Faculty Deans and Professional Services Directors that this Policy is being adhered to at a local level.
- All appropriate reporting is taking place and being recorded centrally.

The Audit and Risk Committee will receive a copy of the Gifts and Hospitality Register at each scheduled meeting and will maintain oversight of fraud and integrity risks, including those linked to gifts, hospitality, conflicts of interest, and the use of public funds through the Fraud Risk Register and associated assurance reporting.

## 5. What Gifts or Hospitality can I offer and accept?

You may only offer or accept a gift or hospitality in accordance with this Policy.

You must not accept any gift or hospitality where, there is or could be, any expectation that it will lead to a business advantage for a third party. This includes circumstances where gifts or hospitality could influence, or be perceived to influence, decisions relating to student recruitment, admissions, funding eligibility, attendance monitoring, regulatory reporting, or the allocation or use of public funds.

Similarly, you must not offer gifts or hospitality in connection with QAHE business where there is or could be any expectation that it will lead to a business advantage for QAHE.

You must not offer or accept gifts or hospitality that may affect, or be seen to affect, your professional judgement.

You should never:

- Offer, promise, or give a gift or hospitality, where this may be construed as a bribe or be otherwise improper.
- Offer, promise or give a gift or hospitality, to a public official where this may be construed as a bribe or an attempt to influence the public official in their capacity as such (remembering that public officials may include employees of state-owned entities).

All gifts and hospitality (whether given or received), must:

- Be approved in line with the limits given below,
- Be proportionate and reasonable having regard to the recipient and not give rise to any ethical concerns and must have a genuine and legitimate purpose, such as the promotion of QAHE's services or to establish cordial relationships with those with whom we work,
- Not risk being perceived as lavish or excessive (for example, it should not include any unjustifiable "add-ons" such as the provision of travel, or entertainment of spouses or family members),
- Comply with all applicable local laws as well as the Bribery Act (if given or received outside of the UK) and comply with any other rules relevant to the recipient (such as their own organisation's policies in this area),
- Not be offered or received at an inappropriate time (such as during a competitive tender involving the recipient or in advance of another business decision the recipient is involved with), which might risk being perceived as improperly influencing the recipient,
- Be given openly, not secretly; and be correctly and transparently documented in the Gifts and Hospitality Register.



The offering and acceptance of modest gifts and hospitality may be considered an accepted part of normal business or as a means of fostering and developing business relationships.

## 6. Incident Reporting and Management

Improper gifts or hospitality may indicate or facilitate fraud, bribery, conflicts of interest, or the inappropriate use of public funds and must be managed in line with the Framework. QAHE 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.

### 6.1. Gifts Given

QAHE 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 QAHE,
- to present QAHE'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.

QAHE 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 QAHE, 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 and 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 [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 for agents the Chief Commercial Officer and 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 [Governance](#) Hub on the [Intranet](#).



### 6.3. Hospitality Given

QAHE 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 QAHE,
- c) to present QAHE'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.

QAHE 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 partner institutions, and must not be offered, promised or accepted to secure an advantage for QAHE, 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](#).

### 6.5. General Note

In certain situations, it may not be suitable to keep such gifts or be provided with the 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 QAHE'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.

### 7.1. 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 team member budget holder. 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

### 7.2. 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 recorded 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.

### 7.3. Monitoring and Reporting

Spot checks will be conducted regularly to ensure compliance by Finance and the Chief Commercial Officer, 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. 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,
- must not give rise to actual or perceived risks relating to fraud, bribery, conflicts of interest, or the inappropriate use of public funds.

## 8.1. 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 requiring 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.

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

QAHE 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 Team.

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. Advice and Guidance

Advice and guidance in relation to this Policy can be sought from the Chief Governance & Transformation Officer and Head of Legal.

If you have any concerns about gifts and hospitality or conflicts of interest and wish to speak to someone confidentially about those concerns, please email [QAHE.Governance@qa.com](mailto:QAHE.Governance@qa.com)

Further information regarding whistleblowing is set out our [Whistleblowing Policy](#).

Alongside this Policy, QAHE has a Counter-Fraud Framework which consists of several policies guiding and supporting you to ensure that you act in compliance with the Bribery Act 2010. For the purposes of this Policy, you should ensure you are also familiar with the following policies:

- [Conflict of Interest Policy](#), which deals with the identification, recording, and



management of conflicts of interest, and

- [Anti-Bribery Policy](#), which deals, primarily, with QAHE's compliance with the Bribery Act 2010.

## 10. Reporting Concerns

QAHE depends on its employees and Associated Persons to make sure that the highest standards of ethical conduct are upheld in all its business dealings. Employees and Associated Persons are requested to assist QAHE and to remain careful in preventing, detecting, and reporting bribery and corruption. This includes concerns relating to fraud risks and the inappropriate use of public funds, including those linked to student-related activity, funding claims, and regulatory reporting.

You are encouraged to report any concerns that you may have to the relevant cost centre manager or Executive Team lead as soon as possible.

Any such reports will be carefully investigated without delay by QAHE in the strictest confidence.

QAHE will ensure that you do not face any disadvantage or unfavourable treatment as a result of your 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 told you are told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent. You should report the matter to the relevant cost centre manager or Executive Team member.

### 10.1. 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

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](#)

## 11. Failure to comply

All members of QAHE must comply with the terms of this Policy. If you fail to adhere to the terms of this Policy, you may be subject to disciplinary action, up to and including dismissal.



## 12. Training

QAHE promotes a culture of integrity through regular communication and awareness activities, ensuring that all staff understand their responsibilities under this Policy. Completion of mandatory training is monitored by the People Team and reported to the Executive Team 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. Ongoing assurance activities support this, including monitoring completion rates, effectiveness assessments and internal audit validation.

## 13. 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.

