



British International School
of Ljubljana
an Orbital Education School



Anti-Bribery and Anti-Corruption Policy



Introduction

Our Mission

We provide a **high quality British style international education** in English, balancing tradition and innovation.

We aim to be the internationally recognised, **outstanding educational choice** for families in the region.

Our passion is creating a **positive, safe and nurturing learning environment** in which everyone is valued as individuals, empowering them to be versatile, motivated and caring people.

We will endeavour to **create opportunities** to develop creativity, collaboration and critical thinking skills through an **inclusive and personalised experience**.

Our Values

Excellence - We strive for excellence in everything we do.

Respect - We learn at school by showing respect to everyone in the community

Responsibility - We are engaged, promoting actions and behaviours that support a sustainable future.

Integrity - We are transparent, honest and ethical in all our relationships.

Compassion - We are kind and caring, encouraging everyone to succeed.

This policy is written in direct reference to the *Orbital Education Group (inc subsidiaries) Anti-Bribery & Anti-Corruption Policy*. It aims to summarise the key policy statements within that policy and contextualise it for the British International School of Ljubljana. It does not replace the Orbital Policy, which supersedes this policy in terms of how the school will operate in the areas of Anti-Bribery and Anti-Corruption.

This policy is written to act as a source of information and guidance for those working at the British International School of Ljubljana. If further clarification is sought, direct referral should be made to the *Orbital Education Group (inc subsidiaries) Anti-Bribery & Anti-Corruption Policy*. The policy aims to help staff at the school recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

Policy Statement

- Orbital Education and the British International School of Ljubljana are committed to conducting business in an ethical and honest manner.
- The British International School of Ljubljana is committed to acting professionally, fairly and with integrity in all business dealings and relationships within school, with parents, outside providers, vendors and associate businesses.
- This policy applies to all employees, including: administrative staff, teachers, teaching assistants and classroom helpers.



- There is an expectation that any outside provider, vendor or business associate that the school operates with, or employees deal with in their school business relationships will also uphold the principles contained in this policy.

Definition of Bribery

- Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.
- The British International School of Ljubljana recognises that when developing professional business relationships with customers, consumers and business associates, particular caution may need to be taken in regard to expectations arising from potential acts of bribery.
- Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.
- Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the Principal, who may refer the matter to the Regional Head of Schools (RHoS).

What is and what is NOT acceptable

Gifts and hospitality. The school accepts normal and appropriate gestures of hospitality and goodwill, so long as the giving and receiving of gifts meets the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- b. It is not made with the suggestion that a return favour is expected.
- c. It is in compliance with local law.
- d. It is given in the name of the company, not in an individual's name.
- e. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- f. It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you for helping with a significant project upon completion).
- g. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- h. It is given/received openly, not secretly.
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- j. It is not above a value of 25 EUR.
- k. It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the relevant RHoS.



Gifts from parents. The most common gifting or acts of hospitality received by employees will be those from parents. The school accepts and honours the ability of a employee to receive a personal gift as a gesture of thanks from a parent.

Teachers are advised to only accept gifts that fall within the following parameters:

- a. The gift is offered 'post the act of the service by the employee' and not 'prior to the act of service by the employee'. Teachers, for example, may therefore feel comfortable about receiving a gift from a parent at the end of a year or term of teaching a child, but it would not be appropriate to accept this at the start of the term or year. The interpretation might be that this is being presented as a bribe for the teacher to then carry out a particular or selective service.
- b. The value of the gift does not exceed 25 EUR.
- c. The gift does not include cash or a cash equivalent (eg voucher or gift certificate).
- d. Teachers are additionally advised to refrain from hospitality gifts offered by parents that would take place outside the school. It would be very easy for parents to manipulate such activities and to make teachers feel obliged to say, do or expose themselves professionally in such a situation. This includes gifts of meals with the family, holidays, overnight stays in owned accommodation or participation in activities with the family.
- e. To protect all receivers of gifts within school, the Accounts Department will hold a Gifts Record Book. All teachers are advised to record any gift they receive into this book and its estimated cost.
- f. Gifts that are offered to an employee that are felt to be in excess of 25 EUR should be directly declared to the Principal, who (after advice from the RHoS if felt needed) will make a decision on if and how the gift should be received.

Employee Responsibilities

- a. All employees of the British International School of Ljubljana must ensure that they read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information they are given.
- b. Employees should sign the declaration at the end of this page to acknowledge an understanding of this policy and their agreement to adhere to the principles and practices laid out within it.
- c. If any employee has reason to believe or suspect that an instance of bribery or corruption has occurred within school or will occur in the future that breaches this policy, they must notify the Principal.
- d. If any employee breaches this policy, they may face disciplinary action and could face dismissal for gross misconduct. The school has the right to terminate a contractual relationship with an employee if they breach this anti-bribery and anti-corruption policy.
- e. If an employee refuses to accept or offer a bribe or they report a concern relating to potential act(s) of bribery or corruption, the school understands that they may feel worried about potential repercussions. The school will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.



Signed.....(employee)

Date.....

Review and Evaluation

This policy is to be reviewed and evaluated every two years by the SLT, Principal and with the RHoS.

Due for Review: 10/07/2023

PREPARED BY: Principal - *AWH* 10/07/2021

Revised by Michael W Clack RHoS 20/08/2021