



**British International School  
of Ljubljana**  
an Orbital Education School



# Anti-Bribery and 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)**

Orbital Education Group is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. Orbital Education Group has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, whichever country we operate.

Orbital will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regard to our conduct both at home and abroad.



Orbital recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

### **Who is covered by the policy?**

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Boards, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

### **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**

This section of the policy refers to 4 areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

**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 100 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.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the relevant RHoS, who will assess the circumstances.

Orbital/BISL recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts given and received (usually in Excess of £100) should always be disclosed to the Principal and/or the relevant RHoS. Gifts from suppliers should always be disclosed.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the relevant RHoS will be sought.



**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 100 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 50 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.

### **Facilitation Payments and Kickbacks**

Orbital/BISL does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

Orbital/BISL does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

Orbital recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- a. Keep any amount to the minimum.
- b. Ask for a receipt, detailing the amount and reason for the payment.
- c. Create a record concerning the payment.
- d. Report this incident to your line manager.



### **Political Contributions**

Orbital/BISL will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

### **Charitable Contributions**

Orbital/BISL accepts the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions made.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the relevant RHoS

### **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.

### **Employee Responsibilities**

As an employee of Orbital Education, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

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.

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 and/or the RHoS.



If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Orbital has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

### **What happens if I need to raise a concern?**

This section of the policy covers 3 areas:

- a. How to raise a concern.
- b. What to do if you are a victim of bribery or corruption.
- c. Protection.

#### **How to raise a concern**

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Orbital, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your Principal, the relevant RHoS, a director or Group Head of HR (Andy Edgar [andy@orbital.education](mailto:andy@orbital.education)).

The school will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

#### **What to do if you are a victim of bribery or corruption**

You must tell the Principal/relevant RHoS as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

Protection - If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Orbital understands that you may feel worried about potential repercussions. Orbital will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

Orbital will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform the Principal and/or the relevant RHoS immediately (RHoS – Karl Wilkinson [karl@orbital.education](mailto:karl@orbital.education)).

#### **Record keeping**

Orbital/BISL will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to managerial review.

#### **Monitoring and Reviewing**



Orbital's directors are responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Principal.

This policy does not form part of an employee's contract of employment and Orbital/BISL may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

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:**

**July 2027**

**PREPARED BY: Mel Hitchcocks**

**Principal, 18/07/2025**