



# Anti-Bribery and Corruption Controls and Procedures

According to the UK Bribery Act 2010 and other similar legislation, Gaia Education has put the following controls and procedures in place for the prevention of bribery and corruption. Gaia Education also seeks to ensure that anti-bribery principles are rooted throughout the organisation, and this document works alongside our Code of Governance, Conflict of Interest Policy and Procurement Policy.

## Definition

For this policy, bribery is defined as the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages- taxes, services, donations, favours etc. (Transparency International, 2018).

## What is a bribe?

- Bribe- A bribe is any advantage including monetary payment, reward, accepting an expensive gift or anything of value
- Facilitation payment- given to speed up or make certain activities possible. This is still a form of bribe and will not be tolerated unless there is a danger to those involved (see point below)
- Bribe that is taken/given under duress- at those times when a person's safety is threatened, then a bribe may be paid or accepted under these conditions.

## Policy

As per Gaia Education Anti-bribery and Corruption Principles, this organisation adopts a zero tolerance attitude towards bribery and corruption.

## Controls

## Communication

- The Board and management of Gaia Education will set an example of transparency and ethical conduct.
- Gaia Education has set out a clear anti-bribery policy so that all staff and Board members are aware of the potential risk.
- Gaia Education makes it clear that bribery and corruption will not be tolerated and that staff and Board members will face disciplinary action and potential legal proceedings if they are found to be involved in them.
- Gaia Education will provide information to staff and the Board on how to report breaches of this policy using the Anti-bribery Record Form.

- Online training for anti-bribery has been made compulsory for staff, management and Board members.

## Conflict of interest

- Board members have filled in a 'record of interest' that can be used alongside this policy to mitigate the risk of bribery. For example, in situations when a Board member has a pre-existing involvement with a potential partner, then that Board member will be asked not to participate in the discussions regarding that particular partner.
- Staff members have also filled in a 'record of interest' that can be used alongside this policy to mitigate the risk of bribery. For example, if Gaia Education uses a staff family member's catering company to supply food at a Gaia Education event, then justifiable reasons for using this company above others must be given.

## Risk assessment

- In those situations where there is increased risk of bribery, for example, a meeting taking place in a country where it is known that bribery does take place, a separate risk assessment should be undertaken for the purposes of this meeting/visit.
- Gaia Education will put in security measures prior to visiting hostile regions to minimize the risk of bribery under duress.

## Due Diligence

- Background checks will be carried out to ensure that current or potential partners have not used bribery in the past, and there is no risk of them doing so in the future.
- Company policy on the unacceptable use of bribery will be outlined to potential and existing partners.
- A country's risk of corruption will be thoroughly investigated when working with external partners and organisations.
- This policy will work alongside the Gaia Education Procurement Policy to ensure that the risk of bribery is minimised and that goods purchased and sub-contractors used by Gaia Education are free from corruption. The Board will deliberate and carefully verify the costs, benefits and risks from any of these goods or services.

## Procedures

### Reporting Internally

The following reporting systems are in place in the instance that Gaia Education members see or suspect another person or organisation of receiving or giving a bribe.

- If a member of staff sees a manager receiving/giving a bribe – report this to the Board
- If a manager sees a member of staff receiving/giving a bribe – report this to the Board
- If the staff/manager sees Board receiving/giving a bribe – report this to the People Care group.



All staff, management and Board members are expected to report suspicion of bribery or attempted bribery or corruption in all cases and fill in the Anti Bribery Record sheet. If someone is seen accepting or offering a bribe, then it is your responsibility to report this to the appropriate authority. Failure to do so could result in disciplinary action or legal proceedings against you.

Protection mechanisms are in place for those making a claim against another. Information given will only be shared with the necessary parties.

## **Reporting Externally**

It is the responsibility of the manager/Board to report any incidents or cause for concern to the relevant authorities.

## **Record Keeping**

Ensure a thorough record of the incident is taken, including key details such as date, time, those involved, description of what happened. Gaia Education has created an Anti-bribery Record Form for this purpose.

## **Acceptable receipt of gifts**

- Low cost gifts can be received and/or offered when necessary. An example would be if it would cause offence not to accept the small gift.
- If you have been offered a low cost gift, write down the details and record it, informing your manager.

## **Facilitation Payments**

Facilitation payments are not acceptable and will not be tolerated.

## **Bribes under duress**

Bribes may have to be given or accepted under duress. An example would be if it were to endanger life should you refuse to give/receive the reward.

## **Hospitality**

Gaia Education expressly prohibits all employees from offering or receiving any gift of hospitality that could influence a business decision. Furthermore, hospitality expenses are not permitted to or from any person or organisation where the intent is to benefit either party. If there is any doubt, the matter should be referred to the Board before any hospitality payments or gifts are given or received.

