

Purpose, Scope and Composition

The Travelife Technical Committee provides diverse opinions and expertise to help guide Travelife in three specific areas:

1. Changes to the Travelife Standard.
2. Appeals made by accommodation providers about certification decisions.
3. Occasionally providing guidance on unusually complex certification decisions.

The Travelife Technical Committee is comprised of:

- The Travelife commercial director who serves as the committee's chairperson.
- At least two Travelife auditors who must abstain from any appeals relating to audits they have carried out and who agree not to audit a hotel whose appeal they have been involved with until 2 years have passed since the appeal concluded.
- At least two travel industry representatives who must abstain from any appeals relating to audits at hotels they own or have contracts with.
- At least one sustainability expert who is not employed or contracted by Travelife.
- A representative from ABTA Health & Safety team whose primary role is to provide input on the accommodation health and safety implications of Travelife Standard changes and appeals decisions.
- At least two tourism accommodation representatives who must abstain from any appeals relating to audits carried out at their own site.

Email info@travelife.org to obtain the current list of committee members and the name of the chairperson.

General Duties and Responsibilities

- The Travelife Technical Committee is never required to meet in-person, with all communications being via email or telephone, and all meetings being virtual.
- Committee members are expected to respond to email requests within the timeframe given.
- Travelife will strive to schedule virtual meetings at times that are convenient for all committee members, and members are expected to make all reasonable efforts to attend due to important discussions that will take place.
- Committee members must abide by the Code of Conduct outlined in this document and sign a declaration stating their compliance.
- Committee members may resign at any time by emailing the chairperson (the Travelife commercial director) and whilst not mandatory, nominations for a replacement are greatly appreciated.
- Committee members are expected to immediately declare to Travelife any potential conflicts of interest that would prevent them from carrying out their duties in an independent, impartial and objective manner.
- Committee members must treat all information and committee discussions as confidential.

Duties and Responsibilities Relating to Changes to the Travelife Standard

Changes fall into two broad areas that have been explained below, along with the duties and responsibilities for each:

Travelife Standard Updates: These are minor changes that do not substantially change the criterion. Accommodation providers with a current certification should still be able comply to the changed

criterion without making significant operational changes. For example, simplifying text, factoring in new technology that makes compliance easier or new auditor indicators that improve consistency across audits. Travelife have a formal process in place for standard updates that can be requested by emailing info@travelife.org.

Committee duties and responsibilities

1. Travelife will seek the committee's opinion on whether a proposed change falls within the process for a Travelife Standard Update or whether a full Travelife Standard Review is required.
2. Committee members will be provided with a summary of the change including the purpose and potential impact on accommodation providers, auditors and certification decisions.
3. Committee members must provide requested feedback within a given deadline that will be no less than 30 days.
4. This process will not require any in-person meetings.

Travelife Standard Reviews: These take place at least every 5 years or when there is another reason to substantially change criteria in such a way that accommodation providers may need to make operational changes in order to comply. They will likely involve updating auditor training. Travelife have a formal process in place for standard reviews that can be requested by emailing info@travelife.org.

Committee duties and responsibilities

1. Travelife will advise the committee that a Travelife Standard Review is going to take place along with the expected timeframe. The process that typically takes 6 months and does not involve attending in-person meetings.
2. Following an initial stakeholder consultation process, the committee will be sent a first draft of the new standard along with a summary of changes and stakeholder feedback. The committee will be given 30 days to provide any recommendations.
3. A final draft of the new standard will be sent to the committee who will be given 14 days to review the final draft and submit any recommendations. Should these recommendations result in Travelife making further changes, then this process will be repeated until Travelife have the standard ready to submit to GSTC (Global Sustainable Tourism Council) for approval/recognition.

Duties and Responsibilities Relating to Certification Decision Appeals

An appeal is a formal, written request by an accommodation provider that requests reconsideration of a certification decision. Due to the way Travelife's certification process works, formal appeals are extremely rare. For example, at the time of writing in June 2021, no appeal had been received since the formal appeal process was first published in 2018. The Travelife appeals procedure can be found [Appendix A](#).

Committee responsibilities and the appeals process

1. The entire appeals process will take 30 to 90 days, with committee members being expected to respond to at least three emails and attend up to two online meetings or conference calls. There are no in-person meetings.
2. Travelife will notify the committee that a formal appeal has been received and the name of the hotel that is lodging the appeal. An appeals meeting date will be set with a minimum of 28 days notice. This meeting will be online or via conference call (the committee is never required to meet in-person).

3. From the date that Travelife notified the committee that an appeal has been lodged, committee members have 14 days to notify Travelife if they suspect they have a conflict of interest that could harm their ability to make an independent, impartial and objective appeal decision. Travelife may seek further details before deciding if the committee member should abstain from any further involvement.
4. Once the final composition of the committee has been established, and no less than 7 days prior to the appeal review meeting, Travelife will send the committee full details of the appeal including any supporting documentation. Travelife will also notify the accommodation provider making the appeal of the date and time of the meeting, along with the names of the committee members who will attend the meeting. The accommodation provider may object to the final list of committee members with the Travelife commercial director having the final decision on which committee members can attend.
5. Making the appeal decision during the meeting:
 - a. The Travelife commercial director will present the evidence and opinions of Travelife and the accommodation provider.
 - b. Committee members will be invited to give their opinions on a final appeal decision.
 - c. Committee members will be invited to ask any questions and to request further evidence from either Travelife or the accommodation provider to help inform their opinions. If these questions and requests can be satisfied during the meeting, then a final decision will be made by the commercial director based on a majority vote by committee members on whether to grant or deny the appeal.
 - d. If questions and requests for evidence cannot be satisfied during the meeting, then a second and final meeting will be set no more than 21 days later when they will be presented. At this time further opinions will be sought from committee members and a final decision made by the commercial director following a majority vote by committee members on whether to grant or deny the appeal.
6. The accommodation provider will be notified of the decision and that there will be no further opportunities to appeal the decision.

Travelife Technical Committee Code of Conduct

Anti-bribery and corruption: Travelife takes its obligations seriously under the UK Bribery Act 2010. Travelife's anti-bribery and corruption policy can be found [Appendix B](#).

Confidentiality: All committee members shall treat as strictly confidential any matter of which they become aware of, or any information received or obtained by them in their position as a Travelife Technical Committee member. Committee members may only disclose information which would otherwise be confidential if and to the extent that it is required by law; or if the information has come into the public domain through no fault of theirs; or if Travelife has given prior written approval of the disclosure.

Data management: During the course of their duties, committee members may receive personal data such as names, email addresses and phone numbers relating to accommodation staff, auditors or other stakeholders. The EU General Data Protection Regulation (GDPR) and UK Data Protection Act 2018 apply to all personal data you receive, and it is important to understand your obligations in relation thereto. As a general rule, any personal data received in the course of your work as a committee member must be stored securely and permanently deleted when it is no longer required.

Independence, impartiality and objectivity: Committee members must exercise independent judgement and must exercise their powers independently, without subordinating their powers to the will of others, whether by delegation or otherwise.

Committee members must act objectively and impartially in their duties, and must not allow any commercial, financial or other pressures to compromise their impartiality. In addition, when committee members are assessing appeals, it is expected that committee members will:

- Immediately advise Travelife and recuse themselves from an appeal review if there is any potential conflict of interest between the committee member and the entity making the appeal.
- Draw conclusions and opinions that are based exclusively on evidence provided and in accordance with the Travelife Standard.
- Make use of information brought forward by the audited entity and other parties. This information is to be considered in the opinions expressed by committee members in an impartial way.

Appendix A: Travelife Appeals Policy

Travelife are committed to operating our certification programme to the highest levels of skill, professionalism and impartiality, and in line with all external laws, regulations and policies that we follow. All subscribed accommodation providers have the right to appeal certification decisions made by Travelife. We are committed to fully investigating these appeals and responding to these in a timely manner.

The Travelife Appeals Procedure

Submitting an appeal: Appeals can only be made and accepted after an audit has been completed, following communication of the audit result and during the initial period granted for the submission of improvements, which is within 30 days of this communication. Travelife reserves the right to refuse any appeal that is not submitted within this timescale. All formal appeals submitted under our appeals procedure should be emailed to info@travelife.org with the text 'formal appeal' included in the subject field.

Communications during the appeal: All communications with the appealing accommodation provider will be in writing and delivered to them at the email address associated with the commercial director. If another party is appealing on behalf of a Travelife accommodation provider, communications may be sent to a different email address provided it has been confirmed in writing by the Travelife accommodation provider.

Timeframe: Travelife will investigate the appeal in a timely manner. All appeals will be acknowledged in the first instance on receipt of the appeal. Travelife will communicate the expected date to get back to the accommodation provider and depending on the nature of the appeal and the level of investigation needed by Travelife, up to a maximum of 3 months.

The Appeals Panel: The Travelife Technical Review Committee will serve as the Appeals Panel and the Travelife commercial director will serve as chairperson. You can request information about the Travelife Technical Review Committee including the current committee members by emailing info@travelife.org. All members of the Appeals Panel shall be independent of the audit, improvement and certification process.

Appeals Panel evaluation: A meeting of the Appeals Panel will be held online or via teleconference as soon as it can be arranged and at the convenience of all parties. The appealing accommodation provider will be given a minimum of 7 working days' notice of the time and date of the appeal and will be advised of the names of the chairperson and members of the Appeals Panel. The appealing accommodation provider may object to one or more of the Appeals Panel members but must give reasons in writing to the chairperson who reserves the right to refuse to make changes to the Appeals Panel. The appealing accommodation provider shall provide full details of any such objection and all supporting evidence in writing (documents, testimonies, photographs) to the Appeals Panel at least 4 full working days prior to the meeting of the Appeals Panel.

Conduct of the Appeal Panel evaluation: The chairperson of the Appeals Panel ensures that the Appeals Panel reviews, in confidence:

1. Evidence and opinions provided by both the appealing accommodation provider and the Travelife Certifications, Compliance and Quality control team.
2. These evidence and opinions will be considered by the Appeals Panel who will be asked to give their opinions on a decision and/or ask further questions or for further evidence. If there are no such questions or requests, then the chairperson will make a decision on whether to accept or deny

the appeal based on a majority vote by the Appeals Panel and the accommodation provider will be notified in writing of this final decision no later than 7 days after the Appeals Panel meeting. This decision is final and conclusive.

3. If the Appeals Panel does have further questions and evidence requests, these will be submitted in writing to the appropriate party and timescales for response will be provided. A final meeting will be scheduled no later than 28 days after this request during which time the opinions of the Appeals Panel will be discussed and the chairperson will make a decision on whether to accept or deny the appeal based on a majority vote by the Appeals Panel and the accommodation provider will be notified in writing of this final decision no later than 7 days after the Appeals Panel meeting. This decision is final and conclusive.

Notification of the decision of the Appeals Panel: The chairperson of the Appeals Panel notifies Travelife and the appealing member by email of the decision reached by the Appeals Panel within 7 working days from the date of the Appeals Panel decision.

Redress: In the event of the Appeals Panel reaching a decision to revise the original decision made by Travelife, redress is limited to the declaration by Travelife of the revised decision in the same manner as the original decision was declared. There shall be no liability for loss or damage upon the original decision.

Corrective action: Travelife will consider the findings of the Appeals Panel and take any appropriate corrective and preventive action as required to ensure consistency and integrity of the standard.

Records: Records of any appeal will be retained by Travelife for a minimum of 3 years. The details are captured on the Appeals Record and Action Tracker that contains a summary of each appeal received, how it is reviewed by the Appeals Panel and actions taken to resolve them.

Confidentiality: All complaints received will be dealt with confidentially and in accordance with the requirements of the UK Data and privacy laws, and the Travelife General Privacy Policy can be requested by emailing info@travelife.org.

Appendix B: Travelife Anti-bribery and Corruption Policy

It is Travelife's policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

The purpose of this policy is:

- To set out the responsibilities of Travelife and of those working for and with us, in observing and upholding our position on bribery and corruption; and
- To provide information and guidance to those working for and with us on how to recognise and deal with bribery and corruption issues.

Risks

Bribery and corruption are punishable for individuals by up to 10 years' imprisonment and if we are found to have taken part in corruption, we could face an unlimited fine and damage to our reputation. We therefore take our legal responsibilities very seriously.

We have identified that the following may be particular risks for our business:

- The refusal or termination of Travelife subscription may jeopardise a company's ability to trade and may therefore act as an incentive for bribes to be offered.
- Corporate hospitality and gifts: There is a risk that corporate hospitality, such as customer or supplier entertainment, and the giving or receiving of gifts might be seen as bribery, especially in dealings with foreign public officials.
- Facilitation payments: These are payments demanded by officials (or others) simply to secure or expedite the performance of their normal duties (for example, granting a licence, allowing goods to cross a border and so on). These are commonplace in some jurisdictions, but the making of such payments, regardless of how small, will be an offence under the Act.
- We have frequent interactions with public officials, sometimes in high-risk jurisdictions.
- We make awards in various jurisdictions, some of which may be considered high risk and in countries where corruption is perceived to be high.

Who does this policy apply to?

This policy applies to all individuals working at all levels for Travelife, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), committee members, auditors, consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors or any other person associated with us, wherever located (collectively referred to as workers in this policy).

What is bribery? A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. For the purpose of the UK Bribery Act 2010, offences can fall under four categories; offering a bribe, receiving a bribe, bribing a foreign official and failure to prevent bribery by a corporate organisation. Each of these categories are described in more detail below.

Offering a bribe: The offering, promising or giving of a reward to induce a person to perform a relevant function or activity improperly.

Example: You offer a potential supplier tickets to the Travel Convention, but only if they get their company to agree to do business with us on favourable terms. This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential supplier to accept your offer.

Receiving a bribe: The accepting of, agreeing to accept or requesting of a reward in return for performing a relevant function or activity improperly.

Example: A supplier promises to give you free accommodation on your next family holiday but makes it clear that in return they expect you to give them a favourable audit score. It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a foreign official: This is a specific offence involving trying to influence a foreign public official, with the intention of obtaining or retaining business, in a situation where the public official was not permitted or required by law to be influenced.

Example: You arrange for Travelife to make a secret payment to a foreign official to speed up an administrative process such as clearing our goods through customs for the Travel Convention. The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for us and may constitute an offence by Travelife.

Failure to prevent bribery by a corporate organisation: This – the ‘Corporate Offence’ – occurs when an organisation fails to stop people who are operating on its behalf from being involved in bribery. This offence of failing to prevent the act of bribery could occur as a result of the activities of a range of people working on behalf of the organisation – an employee, consultant, auditor or agent, for example – if those individuals were involved in accepting or receiving a bribe which resulted in the organisations gaining or retaining business.

Gifts and hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties provided the following requirements are all met:

- It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.
- It complies with local law; it is given in our name, not in your name.
- It does not include cash or a cash equivalent (such as gift certificates or vouchers).
- It is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time.
- Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time.
- It is given openly, not secretly.
- Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of a Travelife senior manager.

We appreciate that the market practice of giving business gifts varies between countries and regions, and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

What is not acceptable?

It is not acceptable for you (or someone on your behalf) to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to 'facilitate' or expedite a routine procedure.
- Accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them.
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return.
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy.
- Engage in any activity that might lead to a breach of this policy.

Facilitation payments and kickbacks

We do not make facilitation payments or 'kickbacks' of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK but are common in some other jurisdictions.

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt that details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with a Travelife senior manager.

Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

Donations

We do not make contributions to political parties, unless obligatory when attending party conferences or events. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of a Travelife senior manager.

Your responsibilities

1. You must ensure that you read, understand and comply with this policy.
2. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.
3. You must notify a Travelife senior manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a company, supplier or potential supplier offers you something to gain a business advantage with us or indicates to you

that a gift or payment is required to secure their business. Further 'red flags' that may indicate bribery or corruption are set out at the end of this policy.

Record-keeping responsibilities

1. We must keep financial records and have appropriate internal controls in place that will evidence the business reason for making payments to third parties.
2. You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.
3. You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.
4. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept 'off-book' to facilitate or conceal improper payments.

How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with a Travelife senior manager.

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

It is important that you tell a Travelife senior manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

Protection

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Travelife senior management immediately. You can also choose to report this to the ABTA HR or legal teams.

Training and communication

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Potential risk scenarios: 'red flags'

The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only. If you encounter any of these red flags while working for us, you must report them promptly to a Travelife senior manager:

- You become aware that a third party engages in, or has been accused of engaging in, improper business practices.
- You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a 'special relationship' with foreign government officials.
- A third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us.
- A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
- A third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business.
- A third party requests an unexpected additional fee or commission to 'facilitate' a service.
- A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
- A third party requests that a payment is made to 'overlook' potential legal violations.
- A third party requests that you provide employment or some other advantage to a friend or relative.
- You receive an invoice from a third party that appears to be non-standard or customised.
- A third party refuses to put terms agreed in writing.
- You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided.
- A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.
- You are offered an unusually generous gift or offered lavish hospitality by a third party.