

Ethics & Anti-Bribery Policy

For the purposes of this document, Salisbury Area Young Musicians (SAYM) includes Friends of Salisbury Area Young Musicians (FSAYM) and FSAYM Ltd except where specifically stated

1. Intent and Responsibilities

- a. FSAYM Ltd is responsible for setting out the overall policy for Salisbury Area Young Musicians (SAYM)
- b. The Planning and Implementation of this policy is the direct responsibility of the Chairman of the Trustees
- c. The aim is to comply with The Bribery Act 2010, and to protect the charity's finances and its integrity.

2. Shared Responsibilities

- a. All trustees and contractors should make themselves familiar with this policy, and to comply with it at all times
- b. If a situation arises around which they have any doubt or concerns they should raise this immediately with the SAYM Manager, or the Chairman of the Trustees

3. Bribes and Corrupt Practice

- a. SAYM does not allow the direct or indirect offer, payment, solicitation, or acceptance of bribes in any form.
- b. Any trustee or contractor involved in any kind of corrupt practice is likely to be immediately removed from the charity, and may have committed a criminal act which could lead to prosecution
- c. The Ministry of Justice sets out the offences of The Bribery Act 2010 ('the Act') for charitable organisations of offering or receiving bribes, bribery of public officials and of failure to prevent a bribe being paid on an organisation's behalf. The guidance considers charitable donations to be high risk.
- d. As a matter of general principle and to comply with the trustee's legal duties, trustees and contractors should avoid any situation where there is an expectation of a payment in return for their advantage of any kind.
- e. If a trustee has an interest which could lead him or her to be influenced, or to be seen to be influenced, by the real possibility of significant personal gain (or loss) of a financial or non-financial nature, the interest will be deemed to be prejudicial and the trustee should not speak or vote on that matter, and may also need to withdraw from the room.

4. Gifts and hospitality

- a. Trustees and contractors must not accept gifts or hospitality where this might cause their integrity or independence to be questioned

5. Monitoring and review of the Policy

This policy will be monitored by FSAYM Ltd with the subject being a fixed Agenda item in the periodic meetings of the Trustees and SAYM Committee

6. Review of the Policy

This policy will be reviewed annually by FSAYM Ltd

This policy was last reviewed on 4th October 2023