



Anti-Bribery Policy

1. Purpose

Yorkshire Ballet Seminars (YBS) is committed to conducting all of its activities honestly, ethically and in full compliance with the Bribery Act 2010. This policy sets out YBS's approach to preventing bribery and corruption, and explains what is expected of trustees, staff, contractors and anyone else acting on YBS's behalf.

Bribery and corruption are not just illegal; they are inconsistent with YBS's charitable purpose and the trust placed in us by funders, parents, participants, venues and the wider public.

2. Scope

This policy applies to:

- all trustees of YBS
- all employees, whether permanent, fixed-term or casual
- all contractors, including on-site pastoral and teaching roles during residencies
- all contractors, freelancers and consultants engaged by YBS, including fundraising and marketing
- any third party acting on YBS's behalf, for example when negotiating with venues or suppliers

It applies to all dealings in the UK and, where relevant, overseas, including engagement with international participants and their families.

3. What is bribery?

A bribe is an inducement or reward offered, promised or provided to gain a commercial, contractual, regulatory or personal advantage, or to reward improper performance of a function. Under the Bribery Act 2010, it is a criminal offence to:

- offer, promise or give a bribe ("active bribery")
- request, agree to receive or accept a bribe ("passive bribery")
- bribe a foreign public official to obtain or retain business or a business advantage
- fail, as a relevant commercial organisation, to prevent bribery by a person acting on the organisation's behalf

Bribery can take many forms, including cash payments, gifts, hospitality, preferential treatment, donations, or offers of employment, and can be offered or received by an individual or on behalf of the charity.

4. Our policy

YBS strictly prohibits any form of bribery, whether given or received, by anyone acting for or on behalf of YBS. This includes:

- offering, giving or promising a bribe to any person, including venue staff, suppliers, agencies, officials or funders, to gain an improper advantage
- requesting, agreeing to receive or accepting a bribe from any person
- using a third party, agent or intermediary to arrange or conceal a bribe
- using charitable funds or assets for any unlawful or unethical purpose
- or offers of employment or work experience

This applies equally to dealings with commercial suppliers, venues, funders, regulators and any public officials encountered in the course of the charity's work, for example in relation to visas or licensing for international participants.

5. Gifts and hospitality

Reasonable and proportionate gifts and hospitality, given openly as a courtesy or to build a legitimate business relationship, are not normally treated as bribery. However, they must always be:

- reasonable in value and frequency
- given or received openly, never in secret
- proportionate to the occasion and not capable of being seen as an inducement
- compliant with the recipient's own organisation's policy, where known

Any gift or hospitality offered to, or received by, a trustee, staff member or volunteer in connection with YBS business with a value over £100 must be declared and recorded in the gifts register, whether or not it was accepted. Cash or cash-equivalent gifts (such as vouchers) must never be accepted.

Anyone unsure whether a gift or offer of hospitality is appropriate should raise it with the Operations Director or Chair of Trustees before accepting or declining.

6. Facilitation payments and kickbacks

YBS does not make facilitation payments, that is, small unofficial payments made to secure or speed up a routine action (for example, customs clearance or a licence). Anyone who is asked to make such a payment on YBS's behalf, in the UK or overseas, must refuse and report the request immediately to the Operations Director.

Kickbacks, referral fees or commissions paid to reward the award of a contract or preferential treatment are also prohibited.

7. Political and charitable donations

YBS does not make donations to political parties or candidates. Any donation to another charity or good cause made in the charity's name must be approved by the trustees and recorded, to ensure it is not, or could not reasonably be seen as, a disguised bribe.

8. Recruitment, contracting and procurement

Decisions on recruitment, engaging contractors or freelancers (including marketing agencies), and procurement of venues or suppliers must be made on merit, value for money and fitness for purpose, following YBS's normal approval processes. Payments and approvals must follow the thresholds and dual-authorisation controls set out in YBS's Finance Process, including the requirement for payments over £2,000 to get board approval. No individual should offer or accept any inducement in connection with these decisions, and conflicts of interest must be declared in line with YBS's conflicts of interest policy.

9. Record keeping

All financial transactions must be accurately recorded in YBS's accounts and reconciled in Xero, in line with the YBS Finance Process, and no accounts should be kept "off the books" to facilitate or conceal improper payments. Expense claims, invoices and contracts must accurately reflect the goods or services provided.

10. Raising concerns

Anyone who suspects that bribery or corruption has occurred, is occurring, or has been asked to participate in it, must report this as soon as possible. Concerns can be raised with the Operations Director or the Chair of Trustees. Where the concern involves either of those individuals, it should be raised directly with Joanna McDwyer in her capacity as Vice-Chair.

No one who raises a genuine concern in good faith will suffer any detriment as a result, even if the concern turns out to be mistaken. Deliberately false or malicious allegations will be treated as a disciplinary matter.

11. Roles and responsibilities

- The Board of Trustees has overall responsibility for this policy and for ensuring it is proportionate to the charity's risks.
- The Operations Director is responsible for day-to-day implementation, maintaining the gifts register, and acting as the first point of contact for concerns.
- All trustees, staff and contractors are responsible for reading, understanding and complying with this policy, and for reporting concerns.
- A copy of this policy is available on the YBS website, and it is shared with all employees and contractors, freelancers and consultants, ahead of them commencing work for YBS.

12. Breaches of this policy

Failure to comply with this policy may result in disciplinary action, up to and including dismissal for employees, or removal from post for trustees and may be reported to the police or other relevant authorities. Bribery is a criminal offence carrying penalties including unlimited fines and imprisonment.