

## **Anti-Bribery Statement**

This statement is developed in line with the Bribery Act 2010 and accompanying [Guidance](#) issued by the Ministry of Justice. The University applies the Act's six principles of adequate procedures (as set out in table 1) to mitigate the risk of bribery and ensure compliance with legal and ethical responsibilities.

As an organisation in receipt of public funds and operating as an exempt charity, the University is committed to the highest standards of integrity, transparency and corporate governance in all its activities.

The University's anti-bribery framework includes the following elements:

- [Anti-fraud Policy and Procedure](#)
- [Ethics Policy and Framework](#)
- Training and awareness for staff
- Annual fraud self-assessment exercise – incorporated into local risk registers
- Published anti-bribery statement

### **Statement of commitment**

York St John University is committed to upholding the highest ethical standards in the conduct of its activities, placing particular emphasis on fairness, honesty, transparency, and compliance with all relevant laws.

The offering, promising, soliciting or acceptance of a bribe, whether directly or indirectly, is strictly prohibited and will not be tolerated. Bribery is not only a criminal offense but also a breach of moral principles. Engaging in bribery exposes University staff to the risk of legal prosecution, fines, imprisonment, and potential harm to the University's reputation. Violations by staff members will be addressed through the University's disciplinary procedures, and contracts with third parties found to be involved in bribery will be terminated.

As a recipient of public funds and an exempt charity, the University is obligated to establish effective procedures to prevent bribery. This involves implementing measures to prevent individuals acting on behalf of the University from offering and receiving bribes to secure, maintain, or gain a business advantage.

### **Gifts and hospitality**

The practice of giving and receiving hospitality and gifts is not a common occurrence at the University. In instances where such practices occur to promote relationships and networks, the frequency and value are kept low. All occurrences are reported to the Audit and Risk Committee and documented in accordance with Financial Regulations to ensure transparency and compliance.

### **Due Diligence and Third Parties**

Department's must undertake appropriate due diligence when considering new partnerships suppliers donors or other third parties. The level of diligence should be proportionate to the level of risk involved.

Key requirements:

- Due diligence must assess the bribery risk of proposed academic, commercial, or philanthropic relationships.
- The university standard contracts include anti bribery and corruption clauses.
- Third parties acting on behalf of the university, including contractors, agents, consultants, and donors must adhere to the anti-bribery framework.

## Whistleblowing and reporting concerns

Staff members who suspect or are concerned about potential bribery are obligated to report it in accordance with the [Whistleblowing Policy. Confidential reporting mechanisms are available for both staff and external stakeholders, and individuals raising concerns in good faith will be protected from retaliation.](#)

## Conflicts of interest

The Conflicts of Interest Policy is a key component in the University's framework and seeks to mitigate the risk of undue influence or perceived impropriety during critical judgments or decisions made on behalf of the University, particularly concerning members of staff's external or personal affiliations and interests.

**Table 1 - University Approach to the Six Principles of the Bribery Act**

Principle	Approach
<b>Proportionality</b>	Bribery risk is assessed as low but is formally evaluated annually by the Executive Board. The Board of Governors, via its Audit & Risk Committee, reviews the Executive Board's assessment.
<b>Risk assessment</b>	Bribery is assessed within the University's institutional and departmental risk Registers. Departments are required as part of the Financial Procedures, to assess the risk of bribery occurring in relation to their activities and to assess specific business transactions where there may be particular risk.
<b>Due diligence</b>	All proposed partnership, sponsorships, and donor agreements must be subject to appropriate, documented due diligence. This includes risk-based assessments of external parties.
<b>Top level commitment</b>	The Board of Governors receives an annual oral update from the chair of Audit and Risk Committee and a written report on compliance with corporate legal responsibilities to its March meeting. Specific senior staff responsibilities and reporting mechanisms are in place. The University's financial Regulations and Conflict of Interest Policy reinforce top-level commitment to ethical conduct. Annual Financial Statements contain a statement that the University has policies and procedures, including on bribery, to support compliance with legislation.
<b>Communication (including training)</b>	The Anti-bribery Framework is published on the University's website. Training on bribery and fraud awareness is mandatory for all staff every three years. Specialist training is delivered every two years to senior staff and those in higher risk roles.

**Monitoring and review**

Anti-bribery controls are reviewed annually through:

- The gifts and hospitality register
- Conflict of interest declarations
- Reports on sponsorship proposals, and fundraising and gift agreements.
- Internal audit reviews to assess anti-bribery controls
- Annual fraud risk assessments
- Full review of the Anti-Fraud Policy every three years (next due in 2027)
- Annual compliance reporting to the Audit & Risk Committee.

## Version Control Statement

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