

Bribery Act Framework

The framework to address the requirements of the Bribery Act includes the following elements:

- [Anti-fraud Policy and Procedure](#)
- [Ethics Policy and Framework](#)
- Training and awareness for staff
- Annual fraud self-assessment exercise
- The requirement to include bribery related risks in local risk registers
- Published anti-bribery statement

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

The acceptance or payment of bribes 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 other stakeholders involved in bribery will be terminated.

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 Committee and documented in accordance with Financial Regulations to ensure transparency.

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 bribes to secure, maintain, or gain a business advantage. Staff members who suspect or are concerned about potential bribery are obligated to report it in accordance with the [Whistleblowing Policy](#).

The University is committed to upholding exemplary standards of corporate governance. The Conflicts of Interest Policy (link when available) 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.

The University's approach aligns with the six principles of corporate responsibility outlined in the Act: proportionality, risk assessment, due diligence, top-level commitment, communication, and monitoring and review.

University Approach

Principle	Approach
Proportionality	It is believed that there is a low risk of bribery; this is formally assessed by an annual risk analysis undertaken by senior staff and reviewed by the Executive Board. The Board of Governors, via its Audit Committee, reviews the Executive Board's assessment.
Risk assessment	The risk of bribery occurring is addressed through the University's risk management processes. 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.
Due diligence	Departmental assessment of the risk of bribery must form an element of the due diligence undertaken when consideration is being given to entering into a business or academic partnership, acknowledging that such due diligence should be proportionate.
Top level commitment	The Board of Governors is informed via oral report from the chair of Audit Committee and via a written report on corporate legal responsibilities to its March meeting. Specific senior staff responsibilities and reporting mechanisms are in place. A Conflicts of Interest Policy, relevant for every individual employed by, or working for, the University is in place. The University's Financial Policy and Procedures sets out the University's intentions to maintain high ethical standards across all its activities. Annual Financial Statements contain a statement. that the University has policies and procedures, including on bribery, to support compliance with legislation.
Communication (including training)	The Anti-bribery Framework is published on the University's website. Staff training on fraud awareness, including bribery, is provided to senior staff and staff in areas of high risk every two years.
Monitoring and review	Register of gifts and hospitality for senior staff and governors is reviewed annually. Conflicts of Interest Policy, Sponsorship Proposals, Fundraising and Gift Agreements require staff to declare any interests. Fundraising activity and Gift Agreements are reported annually to Finance and Capital Development Committee University Annual Report and Financial Statements presented to Audit Committee. Annual fraud risk assessment report and review of anti-bribery policy framework. Annual report on the use of the anti-fraud policy (full review of policy at least every three years - next due 2027). Internal Audit to include an audit related to anti-bribery practices within their cyclical planning.