

Tackling Tax Evasion Statement 2021-22

This statement has been published in accordance with the Criminal Finance Act 2017. It sets out the commitment of the University of London to preventing persons associated with the University and its subsidiaries from engaging in the criminal facilitation of tax evasion.

Introduction

Tax evasion is when individuals or businesses deliberately omit, conceal, or misrepresent information to reduce their tax liabilities. Organisations can be used by associated individuals or businesses to facilitate taxpayer evasion in the UK or overseas.

The University of London is committed to preventing the facilitation of tax evasion by associated individuals or businesses anywhere within its operations. We do this through the development of reasonable prevention procedures, carrying out regular due diligence and risk assessments of our activities and creating awareness and a culture of compliance throughout the University. We also use our strategic planning processes to identify possible risks for future activity, possible changes in legislation and through efficient and effective contract management.

1.0 The University of London

The University of London is a federation of 17 independent member institutions of outstanding reputation, and several highly acclaimed central academic bodies and activities. Since our foundation in 1836, we have built a distinctive approach to learning, teaching, and research, have provided high-quality and innovative services and have maintained an extensive portfolio of property located primarily in Bloomsbury, the heart of London's Education Quarter. We collaborate to deliver world-leading services including the Senate House Library (SHL), The Careers Group and CoSector; and, through our University of London distance learning programmes, we reach out to thousands of students across 190 countries globally.

This statement covers the activities of the University of London itself and its trading subsidiaries. The academic portfolio covers the University of London distance learning programmes; the School of Advanced Study (SAS) and its constituent Institutes; SHL; the University of London Institute in Paris (ULIP) and The Careers Group. Beyond that, the University also provides a suite of innovative, high-quality academic support and professional services, and manages a valuable property portfolio providing teaching and learning space, student halls of residence and conference facilities. The active trading subsidiaries, all wholly owned by the University are CoSector Limited, Senate House Services One Limited, and Senate House Worldwide Limited.

2.0 Risk Assessment and Implementation of Prevention Procedures

The University is committed to embedding processes which will help eliminate the opportunities for the criminal facilitation of tax evasion.

The University undertakes risk assessments of all operations to determine the nature and extent of exposure to the risk of any "associated persons" engaging in activity that could criminally facilitate tax evasion. Reasonable prevention procedures proportionate to the size, complexity and risk are implemented.

The University maintains a register of possible risks of the facilitation of tax evasion by its staff and associates, as well as listing controls to mitigate those risks, and any actions required to improve those controls. This register is regularly reviewed and updated, as and when required in relation to the nature of the specific risks.

3.0 Due Diligence

Due diligence on both customers and suppliers is undertaken to ensure that the risk of potential interactions with the University or its subsidiaries being used by associated persons to engage in the criminal facilitation of tax evasion is clearly identified before any transactions take place. This due diligence will be proportionate to the identified risk.

4.0 Raising Awareness & Collaboration

As the strategic knowledge base for Tax at the University of London, the Finance Department is committed to staying aware of developments, legislation, and case studies regarding the prevention of the criminal facilitation of tax evasion. Eliminating the opportunities to facilitate tax evasion effectively requires improved traceability, increased transparency and collaboration between statutory agencies, civil society organisations and both public and private sector business.

- The University has nominated a key officer responsible for information and queries on CFA2017 within our organisation – the Key Officer for CFA2017 is Rita Akushie, Chief Financial Officer.
- The University's Organisational & Staff Development Team are incorporating training on CFA2017 into the University's required Training Programme.
- The University has nominated the following officers responsible for information and queries on CFA2017 within the areas that they support:
 - Finance and Planning: Lizzy Conder
 - Distance Education: Craig O'Callaghan
 - Research and Public Information: Elaine Walters
 - General: Amit Luchmeeparsad
- We will work in collaboration with other universities and external bodies such as Office for Students, BUFDG, HMRC and LUPC, to share and develop best practice in due diligence, prevention procedures and the elimination of the criminal facilitation of tax evasion.
- The University's Deputy Finance Director is responsible for supply chain management transparency and initiatives.

University staff are encouraged to speak to any of the nominated officers listed above if they have any questions or concerns about tax evasion. If any individual suspects that any person associated with the University and its subsidiaries is engaging in the criminal facilitation of tax evasion, it must be disclosed as soon as possible to one of the Key Officers named above. In cases where a member of staff believes that informing the Key Officers would be inappropriate, they should consult the University Secretary and/or follow the procedures outlined in Ordinance 23 (Public Interest Disclosure which sets out the University's 'whistleblowing' procedure).

5.0 Consequences for any associated person breaching the University's commitment to zero tolerance towards the criminal facilitation of tax evasion.

Any staff member who fails to meet the University's commitment to zero tolerance towards the criminal facilitation of tax evasion, may be subject to disciplinary action under the University's Disciplinary Procedure (24 September 2008) including potential summary dismissal. The staff member may also be personally liable to criminal prosecution in the UK under existing tax evasion laws.

We use our best endeavours to challenge customers and suppliers that do not meet our standards regarding prevention of the criminal facilitation of tax evasion. Such customers or suppliers may also be liable to prosecution under the provisions of the Criminal Finance Act 2017.

In the supplier selection phase of the University's Procurement Process, we may remove from competition suppliers that do not agree with the University's policies or who have poor supply chain practices in place. In contract management, contracted suppliers will be required to take the necessary action to improve their service delivery and we will work with them to address any concerns. If the supplier does not improve the University may terminate the business relationship.