



Clare College
Financial Policies and Procedures

Tackling Tax Evasion Statement 2022-23

Clare College Tackling Tax Evasion Statement

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Clare College Tackling Tax Evasion Statement

1. Introduction

This statement has been published in accordance with the Criminal Finances Act 2017 (CFA2017). It sets out the commitment of Clare College to preventing persons associated with Clare College and its subsidiaries from engaging in the criminal facilitation of tax evasion.

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.

Clare College 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 Clare College. 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.

2. Clare College

Clare College was founded in 1326 and is the second oldest College within Cambridge University. Clare has developed into a forward thinking and inclusive College which remains true to the vision of our foundress, Lady de Clare, providing a community of students and Fellows where academic excellence flourishes. The College also has two operating subsidiaries, Clare College Conference Ltd and Clare College Limited, which facilitate the College's Conference and Development operations.

3. Risk Assessment and Implementation of Prevention Procedures

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

The College 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.

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The College 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.

4. Due Diligence

Due diligence on customers, suppliers, partners and funders will be undertaken in order to ensure that the risk of potential interactions with the College 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.

5. Raising Awareness & Collaboration

As the strategic knowledge base for tax at Clare College, the Bursar and Deputy Financial Bursar are committed to staying aware of developments, legislation and case studies in regards to 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 businesses.

- The College has nominated key officers responsible for information and queries on CFA2017 within our organisation – the Key Officers for CFA2017 are Lizzy Conder (Bursar) and Rebecca Willatt, (Deputy Financial Bursar),
- The Deputy Financial Bursar will build training on CFA2017 into the College's regular training programme for relevant staff
- The College has nominated departmental officers responsible for information and queries on CFA2017 within the areas that they support:
 - Bursar: Lizzy Conder (Bursar)
 - Bursary: Rebecca Willatt (Deputy Financial Bursar)
 - Legal: Emma Easterbrook (Assistant Bursar)
- We will work in collaboration with other College's, Cambridge University and with external bodies such as the Office for Students (OfS), British Universities Finance Directors Group (BUFDG), Her Majesty's Revenue and Customs (HMRC) and the London Universities Purchasing Consortium (LUPC) to share and develop best practice in due diligence, prevention procedures and the elimination of the criminal facilitation of tax evasion.
- The College's Bursar is responsible for supply chain management transparency and initiatives.

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College 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 College 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 Loretta Minghella (Master).

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

Any staff member who fails to meet the College's commitment to zero tolerance towards the criminal facilitation of tax evasion will be subject to disciplinary action under the College's disciplinary procedures which may include summary dismissal. The staff member or fellow may also be personally liable to criminal prosecution in the UK under existing tax evasion laws.

We use our reasonable endeavours to challenge customers, suppliers, partners and funders that do not meet our standards regarding prevention of the criminal facilitation of tax evasion. Such individuals or entities may also be liable to prosecution under the provisions of the Criminal Finances Act 2017.

In the supplier selection phase of the College's Procurement Process, we may remove from competition suppliers that do not agree with the College'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 College may terminate the business relationship.