

TRINITY LABAN CONSERVATOIRE OF MUSIC & DANCE

Tackling Tax Evasion Statement from Senior Management (Corporate Criminal Offence)

This statement has been published in accordance with legislation as outlined by the Criminal Finance Act 2017 (CFA 2017). It outlines the commitment of Trinity Laban Conservatoire of Music and Dance to preventing persons associated with the Conservatoire 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.

Trinity Laban Conservatoire of Music and Dance 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 Conservatoire. 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 Trinity Laban Conservatoire of Music and Dance

In 2005, Trinity College of Music and Laban, leading centres of music and contemporary dance, came together to form Trinity Laban Conservatoire of Music and Dance, the UK's first ever conservatoire of music and dance. Our innovative course provision, exciting performances and ground breaking education, community and social inclusion work make Trinity Laban a leader in the advancement of creative artistic practice. Our unique conjunction has created exciting opportunities for collaboration between instrumentalists, singers, composers, dancers and choreographers.

The Conservatoire and its trading subsidiary provides innovative high-quality academic support and professional services, which helps in the management of activities across the organisation. The active trading subsidiary, wholly owned by the Conservatoire is The Blackheath Halls.

2.0 Risk Assessment and Implementation of Prevention Procedures

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

The Conservatoire 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 which are proportionate to the size, complexity and risk of the organisation has been implemented.

The Conservatoire 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 will be undertaken in order to ensure that the risk of potential interactions with the Conservatoire 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 the Conservatoires Finance Department is 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 business.

- The Conservatoire has nominated two Key Officers responsible for information and queries on CFA2017 within our organisation – the Key Officers for CFA 2017 are Barry Douglas Director for Finance and Estates and Jonathan Peel, Director of Operations and Business Enterprises.
- The Conservatoire’s Organisational & Staff Development Team in conjunction with the Finance team will be building training on CFA2017 into the Conservatoire’s Mandatory Training Programme.
- The Conservatoire has nominated departmental officers responsible for information and queries on CFA2017 within the areas that they support:
 - Finance- Rob Carder & Stephen Obuba
 - People and Organisational Development - Paul Neville
 - Estates & Facilities- Clive Howells
 - IT- Yvonne Connell
 - Planning Office- Charlotte Cooper
- We will work in collaboration with other Conservatoires and external bodies such as BUFDG, HMRC, LUPC, and HEFCE, to share and develop best practice in due diligence, prevention procedures and the elimination of the criminal facilitation of tax evasion.
- The Conservatoire’s Head of Procurement is responsible for supply chain management transparency and initiatives.

Conservatoire 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 Conservatoire 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 Conservatoire’s Secretary, Dean Surtees, and/or follow the procedures outlined

in the Public Interest Disclosure which sets out the Conservatoire's 'whistleblowing' procedure which can be found [Here](#)

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

Any staff member who fails to meet the Conservatoire's commitment to zero tolerance towards the criminal facilitation of tax evasion, will be subject to disciplinary action under the Conservatoire's Disciplinary Procedure including 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 Conservatoire's Procurement Process, we may remove suppliers that do not agree with the Conservatoire'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 Conservatoire may terminate the business relationship.

Updated Jan 2018