

# UNIVERSITY OF WESTMINSTER TAX STRATEGY 2024/25

## Introduction

The University is a company limited by guarantee in England, Registration no. 977818. The University of Westminster ("the University") is also a charity within the meaning of the Charities Act 2011 and meets the definition of a charitable company for UK corporation tax purposes.

## Principal operations

The University of Westminster operates from four campuses located in central London and Harrow and is primarily engaged in teaching and research activities.

The University also undertakes commercial activities through its subsidiary companies, University of Westminster (Trading) Ltd and UoW Regent Street Ltd. This Tax Strategy document also applies to these active subsidiaries.

## Scope

This Tax Strategy sets out the University's attitude to tax planning, the University's approach to management of tax risk and approach towards its conduct with Tax Authorities including H M Revenue & Customs ("HMRC"). The Tax Strategy covers all UK taxes, principally VAT, Corporation Tax and employment taxes. It applies to equivalent worldwide taxes where applicable to the University and its subsidiaries.

This strategy was published in August 2024 and the University regards this publication as complying with its duty under paragraph 16(2) Schedule 19 FA 2016 in its financial year ended 31 July 2025. It will be reviewed on an annual basis and updated accordingly.

## Overview of principles

The University is committed to pay the correct amount of tax, at the right time, as per all relevant laws as they apply. For this reason, the University has resolved to conduct its affairs such that it seeks to comply with relevant tax laws, rules, regulations, reporting and disclosure requirements in respect of its operations. The University's Tax Strategy is also aligned with the overall University strategy. The University is committed to exhibiting best practice in all aspects of corporate governance relevant to the higher education sector and has formally adopted the HE Code of Governance.

The ethical principles of tax also underpin the Financial Management of the University with integrity being at the core. The University is committed to following the legal and regulatory requirements and rules placed upon it. Responsibility for the University's Tax Strategy and the supporting governance framework ultimately rests with the University's Court of Governors, with oversight provided by the Resources Committee. The University Secretary and Chief Operating Officer is responsible for the management of the University's tax affairs and the Director of Finance who is responsible for the operation of finance functions (including tax) has oversight of tax risks and their management. Day to day responsibility for the implementation of the Tax Strategy lies with the Accounting Compliance and Tax team who report to the Director of Finance.

## Approach to risk management

The University takes a practical approach to managing risk across all operational areas. We actively seek to identify, evaluate and minimise tax risks. Controls and processes are in place to ensure tax risk is considered as part of the decision-making process in respect of all new university activities and projects.

Training and guidance on tax matters is provided to colleagues positioned in tax related areas across the University. These include payroll taxes, direct and indirect taxes, Accounts Payable and Accounts Receivable to ensure statutory reporting requirements are met as required, Colleagues are able and encouraged to raise queries and seek guidance from the Accounting Compliance and Tax Team where any areas of uncertainty arise.

All tax returns and correspondence with tax authorities are subject to a mandatory review process prior to filing, with controls in place to ensure that all filing deadlines are met.

The Accounting Compliance and Tax Team is made up of appropriately experienced and qualified personnel, who are committed to ongoing Continuing Professional Development to ensure knowledge of current tax legislation and guidance is up to date.

Professional advice is sought by the Accounting, Compliance and Tax Team from external advisers where appropriate - for example, where a significant project is to be undertaken or where specialist advice is required such as evaluating the impact of changes to legislation.

### **Attitude towards tax planning**

The University seeks to comply with relevant tax legislation and to pay the right amount of tax at the right time. In circumstances where the correct amount of tax amount may not be clearly defined, or where an alternative interpretation or application of tax law might result in different tax outcomes, the risk will be assessed by the University, in conjunction with its professional advisers, and if appropriate, the relevant Tax Authority, to determine the appropriate course of action.

The University will seek to optimise its tax position through the application of relevant tax reliefs in a timely manner. Any resulting savings are reinvested in the University's core activities in furtherance of its charitable purposes.

The University will not engage in tax avoidance or aggressive tax planning which is contrary to the letter and spirit of applicable tax law.

### **Approach to working with Tax Authorities**

The University is committed to the highest levels of integrity and professional standards in the manner in which it conducts its tax affairs. The University seeks to maintain an honest, transparent, and collaborative working relationship with all Tax Authorities including HMRC.

All dealings will be conducted in a professional and timely manner.

The University aims to avoid unnecessary disputes with Tax Authorities, and will seek to achieve this through:

- Communication with HMRC
- Where there is uncertainty around the tax treatment of any particular transaction we will, where appropriate, seek clearance from the relevant Tax Authority to assist in finding the way forward.
- Comply with reporting and disclosure requirements in respect of university operations.