

Anti-Corruption Statement from the Principal

St. George's, University of London (SGUL) is committed to applying the highest standards of ethical conduct and integrity in its activities in the UK and overseas. Every employee and individual acting on SGUL's behalf is responsible for maintaining SGUL's reputation and for conducting our business honestly and professionally.

We consider that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets. Tax evasion too is very damaging to societies in which it occurs, as it diverts money and resources from those who need it most.

SGUL benefits from carrying out its business in a transparent and ethical way and helping to ensure that there is honest, open and fair competition in medical education. Where there is a level playing field, our strength will lie in an ability to be agile in response, building on the many opportunities from being a health sciences institution co-located with a university hospital in SW London.

Transparent, fair conduct helps to foster deeper relationships of trust between us, our students and the community whom we serve. It is vital for our reputation and future growth.

SGUL does not tolerate any form of tax avoidance or bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf. The SGUL Council, Senate and senior management are all committed to implementing and enforcing effective systems throughout the organisation to prevent, monitor and eliminate bribery and tax avoidance, in accordance with the Bribery Act 2010 and Criminal Finances Act 2017.

SGUL's anti-corruption policy outlines our position on preventing and prohibiting bribery and tax avoidance on the staff portal. This policy has the full support of Council. The anti-corruption policy applies to all employees, including those of any subsidiary, partnership, or spin-off companies, as well as agency workers, consultants and contractors both in the UK and overseas. All employees and other individuals acting for SGUL are required to familiarise themselves and comply with our anti-corruption policy with immediate effect. It sets out the steps all of us make take to avoid bribery and prevent tax evasion facilitation within our Institution.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Tax-evasion is the illegal non-payment of taxes. It is usually perpetrated by falsely declaring or not declaring taxes due to the relevant tax authority.

Employees and others acting for or on behalf of SGUL are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments and are prohibited from facilitating tax evasion.

As part of its anti-corruption measures, we are committed to transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure. Such expenditure must be authorised in advance, in accordance with our policies and procedures.

A breach of our anti-corruption policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and immediate dismissal. Employees and other individuals acting for SGUL should note that both tax evasion and bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for SGUL.

SGUL will not conduct business with service providers, agents or representatives that do not support our anti-corruption objectives. We reserve the right to terminate any contractual arrangements with third parties acting for, or on behalf of, SGUL with immediate effect where there is evidence that they have committed acts of bribery or tax evasion.

The success of our anti-corruption measures depends on all employees, and those acting for us, playing your part in helping to detect and eradicate bribery or tax evasion. Therefore, all employees and others acting for, or on behalf of, SGUL are encouraged to report any suspected bribery or tax evasion in accordance with the procedures set out in the anti-corruption policy. We will support any individuals who make such a report, provided that it is made in good faith.

A handwritten signature in black ink, appearing to read 'Jenny Higham', with a large, stylized initial 'J' on the left and a long, sweeping underline that extends to the right.

Professor Jenny Higham

Principal

16 February 2018