



H M Revenue & Customs has had a lot of catching up to do whilst unravelling the mess left behind after Covid

May 2022



Background

- On-going investigations
- New investigations
- New Disclosures

Investigations are back underway

- Now running at their highest monthly levels ever
- Penalties on tax avoidance
- Penalties for undue delay



Disclosures



- Will somebody please speak to me!
- Even then you only ever get half an answer

Penalties abound

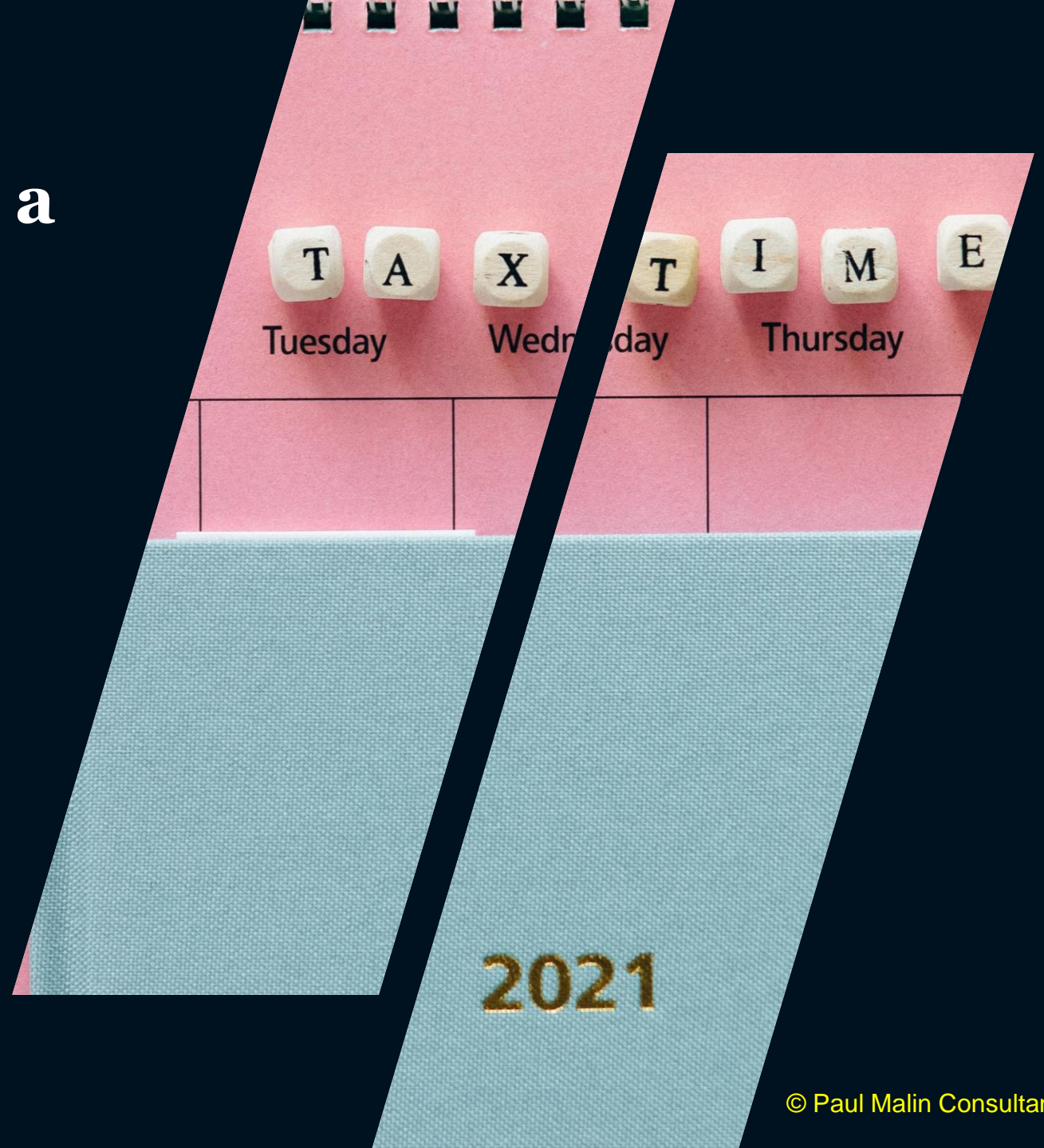
- The Exchequer is benefitting from penalties that are now also being pursued for tax avoidance
- but overall tax debts are at an all time high



“Why we are charging a penalty”

“It applies to returns or documents that:

- relate to a period that began on or after 6 April 2017 and ended after 15 November 2017; and
- were sent to us on or after 16 November 2017”



Rules and special rules

“There are special rules for penalties where an inaccuracy relates to the use of tax avoidance

The rules mean that we have to treat your inaccuracies as ‘careless’”



Who said you can't teach an old dog new tricks?

- H M Revenue & Customs has embraced technology and new working practices
- but it all lacks any consistency across their departments



Customer satisfaction?

- Whilst HMRC are looking to speed up “customer experiences”
- HMRC have forgotten the tax agent’s role in the process





Out with the old and in with the new

- Whilst H M Revenue & Customs are continuing to be inventive and proactive
-some things just never change



New working practices

- Teams meetings
- Staffing levels

So what sort of activities can we expect from HMRC?

Launching any form of tax investigation takes time to research before any cash is collected

- Will HMRC go after the likes of Amazon?
- Or will they go after the low hanging fruit – potentially your clients?



The loan charge

- It's still out there.
- Taxpayers are sitting on a ticking time bomb.
- Will they be getting a “nudge letter?”



Top tips

- Ignore HMRC at your peril
 - Nobody likes to be ignored
 - You'll pay the penalty - literally



Types of nudge letters from HMRC

- Offshore assets
- ATED
- Income Tax
- Capital Gains Tax



The certificate & declaration



HM Revenue
& Customs

Our ref: [Insert Caseflow ref from spreadsheet](#)

UTR: [UTR from spreadsheet](#)

Certificate of tax position to be completed and returned to HMRC

Your tax position

Choose which statement is accurate for your circumstances and tick the relevant box.

Declaration

I confirm that the information I have given on this form is correct and complete to the best of my knowledge and belief. I understand that dishonestly making a false statement to evade paying tax is a criminal offence and I may be subject to investigation and prosecution.

Your name

Signature

Your address

Date

One day it might Dawn on you

- Was non domiciled and non resident
- Married in Japan
- Came to the UK
- Married into wealth
- Not a penny out





Thank you

Any questions?

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