

# taxman

the world of tax risk and investigation

AUTUMN/WINTER 2009



## Welcome to the autumn issue of *taxman*.



As editor of *taxman* do I determine what goes into our magazine? Not without your help.

Over the last three years, almost 5,000 accountants and solicitors across the country have joined us to discuss tax investigations related issues at almost 200 events, from Edinburgh to Exeter. Many others interact with us via email and receive our e-newsflashes or read our regular updates on [tax-investigations.com](http://tax-investigations.com).

Our free 24 hour helpline receives a broad range of queries from accountants, lawyers and business people. It's a free service that reinforces our links with the wider tax community and taxpayers. In the last two years more than 500 people have benefited from using it. Almost every day the phone rings. We always know when something is happening, such as the launch of the New Disclosure Opportunity, the introduction of Senior Accounting Officer rules or the

threat of higher tax rates, because we get a spate of calls asking for information and advice.

It is these interactions that help determine *taxman's* agenda.

We issue almost 20,000 copies of *taxman* across the UK twice a year. Now in its twelfth year, this magazine has one of the largest circulations of any UK tax magazine. We very much hope you continue to enjoy reading it.

Best wishes,

A handwritten signature in red ink that reads "Stephen".

**Stephen Camm**

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# Feeling the squeeze – are you ready for 50%?

In the 2009 Chancellor’s Budget, Alastair Darling announced that the highest rate of income tax would rise to 50% as of 6 April 2010, replacing the proposal in the 2009 Pre-Budget Report to introduce a 45% top rate. This tax rise, on top of the increases to National Insurance rates, heralds a squeeze on higher rate taxpayers and is a reflection of the current state of the UK’s financial position.

Of the 30 countries which are members of the Organisation for Economic Cooperation and Development (OECD), the UK will have the seventh highest income tax rates within 12 months.

In another unwelcome development, the Chancellor also announced changes to the pensions regime which significantly reduce the amount of tax relief available for contributions in certain cases made after April 2010.

In this article Andrew Nutbrown and Gary Telford look at the options and opportunities available to mitigate the impact of these changes.

### Background

One issue which has historically been of vital interest to clients is the effective cost of extracting value from a business. For a company; should directors choose to take dividends, pay pension contributions, or take cash bonuses? For unincorporated business;

should the owners leave capital in the partnership, or withdraw funds from the business? As the table below clearly shows, the proposed changes mean that corporate taxation and capital taxes have become far more attractive than income tax. This means that it is essential to consider whether traditional methods are still effective and, if they are still used, that the full costs are taken into account.

### The impact and comparison of effective tax rates

Individuals & trusts	Was	Now	Will be
Capital gains	40% – 10%	18%	18%
No difference between trade and investment			
Income tax – highest rate	40%	40%	50%

Companies	Was	Now	Will be
Retained	28%	28%	28%
Extracted – Dividend	46%	46%	46%
– Bonus	47.7%	47.7%	56.56% / 57.19%*
– Capital	43.2% – 35.2%	40.96% / 35.2%	40.96% / 35.3%

\*2011/12 – Employers National Insurance increases to 13.3%.

These figures were prepared internally for PwC communications.

A number of strategies are available for businesses to consider.

### 1) Bringing forward income/deferring expenditure

Paying a bonus before 6 April 2010 will mean that it is taxed at the existing top rate of 40%, as opposed to 50% after 5 April 2010. The same savings are available for dividends. Similarly, relief for costs will be at a higher rate if postponed until after 5 April 2010. However, even simple strategies such as this require appropriate funding options to be available and complexity will vary, depending upon the number of partners, directors or employees involved.

### 2) Pension planning

The new pension rules mean that it is sensible to look at alternatives to traditional pension planning, which has seen the loss of tax relief and the increase in tax to pay on pension income received. A variety of investment options are available, ranging from a selection of alternative pension-based investments, to investing completely outside of the pension regime – on the basis that the reduced tax incentives no longer offer attractive enough returns. It is also worth considering whether a non-UK based pension structure might give a more attractive and tax efficient return.

### 3) Emigration

A number of other countries offer attractive tax regimes. However, any move to relocate outside of the UK needs to be taken with a clear understanding of the potential tax pitfalls. Recent tax cases confirm that HM Revenue & Customs will look very closely at any claim to have left the UK for



tax purposes. In the past there has been an over reliance on 'day counting' in the UK, when the prime test has been undervalued: i.e. has the tax payer actually made a break and left the UK? PwC has a network of offices overseas which can advise on the various tax regimes and can enable clients to consider their most appropriate location abroad.

### 4) Maximising capital growth

The current mismatch between income and capital gains tax rates means that now is the perfect opportunity to restructure investments or reward structures, with a view to realising capital rather than income. As ever, the opportunities available depend upon the specific facts and circumstances of a client's financial, personal and tax affairs, but the difference between tax rates as low as 10% (with entrepreneur's relief) and the 50% income tax rate cannot be disregarded.

### 5) Trusts

Where funds are accumulated in a trust, the income will all be chargeable at the highest rate after April 2010. It is important that all income

flows are reviewed to consider whether it is possible to avoid this unwelcome increase.

### 6) Investment structuring

Another option is to use corporate structuring and other tax effective entities to hold investments which produce investment returns, if these are liable to capital or corporation tax rather than income tax. As noted above, this is very attractive due to the differential on these tax rates at the moment and is clearly worth considering closely.

### Conclusion

Tax rates are returning to rates last seen in the 1970s, when Dennis Healey promised to make 'the pips squeak' by imposing higher levels of tax on the highest earners and wealthiest individuals in the UK. Advisors should consider how they might mitigate these changes and plan accordingly. As we have outlined, there is a lot that can be done in the next few months to prepare for the coming changes.

## Jumping ship? Dealing with residence enquiries

Since the Chancellor's announcement of an increase in the top rate of tax, many high net worth individuals are likely to consider 'going abroad for tax purposes'. Often people think that this is simply a matter of counting days, but that is a myth that needs dispelling.

Where you are considered to be resident is not defined in legislation, but by case law and HM Revenue & Customs (HMRC) practice. HMRC has recently taken a number of residence cases to the Special Commissioners (now the First-Tier Tribunal) and beyond, and in all of the cases the taxpayer has been found to be UK resident. Given this recent success, HMRC can be expected to carefully scrutinise claims to be non-resident, especially where there are significant amounts of tax at stake.

HMRC's detailed guidance on leaving the UK is contained in the recently published booklet, HMRC 6. We have helped numerous clients to defend their residence position, and HMRC's main concerns often boil down to the following:

- Did you break UK residence?
- If so, did you remain outside the UK?

### Breaking residence

If you wish to cease to be UK resident, the first requirement is that you must leave the UK permanently or indefinitely (for at least three years), or leave to take up full-time employment abroad. HMRC may ask further questions (in addition to those asked on Form P85) and look for sufficient evidence to substantiate a clean break – unless you can provide suitable proof, HMRC is likely to claim you are still resident in this country. Areas we have seen raised in residence enquiries include the following:

- Whether you retain a UK property.
- Where your family lives and where school-age children are educated.
- Where your business activities are carried out.
- Frequency and purpose of visits to the UK.
- Where other lifestyle factors place you: clubs, banking/investment activities, doctors and dentists, registration to vote etc.

This information will paint a picture that will enable HMRC to take a view on whether you have in fact broken UK residence.

### Remaining outside the UK

Having successfully left the UK you are allowed to make return visits without becoming resident here, provided that you spend an average of 90 days or fewer here a year over the most recent four tax years. If you spend 183 days or more in the UK in a tax year, you will always be regarded as resident here without exception.

Underpinning all this is, of course, evidence. In the case *Barrett v RCC* (SpC 639) the Special Commissioner commented, amongst other things, on the failure by Mr Barrett to provide an airline ticket to support his assertion that he had left the UK.

Proving non-residence is not an exact science and anyone wanting to ensure that their departure is effective for tax purposes should take detailed advice, tailored to their own particular personal circumstances. To genuinely become non-UK resident requires forward planning, discipline and detailed record-keeping, so that if and when HMRC open an enquiry you have all the right evidence in place to demonstrate the strength of your claim.

## Wealth management: removing the risk

With increased focus on tax receipts, some of the more esoteric planning ideas look increasingly likely to fail. We have recently seen a marked decline in appetite for tax risk and an increased desire for certainty. Here we consider some well established methods of managing tax risk; often ignored, but hugely valuable when applied correctly.

### Individual Savings Accounts (ISA)

These vehicles are much maligned, usually because their significant tax advantages of tax-free growth and tax advantaged income are lost through the performance of the assets held within them. If it is appropriate for you to hold risk assets or lower-risk income yielding assets, it will almost certainly be more effective to hold them through an ISA. The allowance is set to increase to £10,200 from April 2010 (or October 2009 if you are aged over 50), and can, over time, provide a tax shelter to a meaningful capital sum.

### Pension contributions

Whilst new rules make these less attractive for savers with total income of more than £150,000, pensions still offer opportunities for those on lower incomes. Funding a stakeholder pension for a non-working spouse, or child, attracts at least 20% income tax relief on contributions of up to £3,600 gross per annum. If other assets are well structured, this may provide for a tax-free lump sum and tax-free income. It should be remembered, however, that from next April pensions can ordinarily only be accessed for those aged over 55, which may mean the investment is very long-term commitment, if you fund pensions for your children.

### Maximum investment plans

The use of maximum investment plans (MIPs) offers the possibility of paying only basic rate tax on investment gains. They must be held and funded for at least seven and a half years, but after this period all growth on the plan is free from liability to the higher rate tax. These savings vehicles have been largely ignored, owing to the availability of tax relief on pension contributions and arcane charging structures, which diminished the possibility of achieving competitive investment returns.

MIPs are now experiencing a renaissance, as their pricing is bought into the twenty first century and people see the benefits of having a tax advantaged savings vehicle without the continued legislative change associated with pensions. They can provide accessible, heritable tax efficient capital for high earners and should be considered as part of any regular savings strategy.

### Discounted gift trusts

Inheritance tax remains a concern for those people who are approaching retirement and wish to pass on as much of their accumulated capital as possible to the next generation, but cannot afford to cede access to their capital. Discounted gift trusts offer an opportunity to gift capital to the next generation, whilst retaining access to a regular income from their gifted capital.

If the person making the gift survives seven years, the value of the trust will fall outside of their estate for inheritance tax purposes. They may benefit from an immediate discount of up to 70% of the value of the gift for inheritance tax purposes, should they die within seven years of making the gift.

### Transferring assets between spouses

The change in tax rules from April 2010, which will increase to the top rate of taxation to 50%, combined with the removal of personal allowances for all individuals whose income exceeds £100,000 per annum, has created a new tier of thresholds to plan for. An individual who earns £100,000 per annum, but also receives £5,000 of gross interest will suffer a £2,500 reduction in their personal allowance and additional tax from April 2010 of £1,000 per annum. This equates to a marginal rate of tax 60%. This would reduce a typical 2.5% interest rate on savings to an effective net rate of 1.0%. Where possible you should review your assets to see whether those earning a high income can be passed to lower earning spouse.

Even if you may both currently be classified as higher rate tax payers, the introduction of new thresholds at £100,000 and £150,000 mean that it may still be beneficial to transfer ownership of income yielding assets between spouses, although you should remember these gifts must be outright and unconditional.

# The ABC of NDO

HMRC announce a New Disclosure Opportunity (NDO) for taxpayers with offshore assets as banks are forced to provide UK residents' offshore account information. Stephen Camm and Jessica McLellan explain.



HM Revenue & Customs (HMRC) has launched its New Disclosure Opportunity (NDO), managed by its oddly titled, 'Director of Campaigns', Marian Wilson, to encourage taxpayers yet again to tell HMRC about liabilities springing from offshore assets. This exercise follows on from the success of the Offshore Disclosure Facility in 2007-2008, which brought in

approximately 40,000 disclosures. These in turn gave rise to £400m of additional revenue at a cost of less than £10m.

The news comes as HMRC continues a determined push for the Tax Tribunal to compel banks and other financial institutions to provide information about UK

resident customers with offshore bank accounts and potentially undisclosed tax liabilities. Four financial institutions were the subject of information notices in March, and in August, in a major breakthrough for HMRC, 308 further financial institutions were served with a notice to give up details of UK resident offshore account holders. There is no doubt that this remains an area to which HMRC is dedicating investigative resource and is one that will inevitably lead to intrusive enquires and potential prosecutions or naming and shaming for those who do not come clean.

This new opportunity will be open to taxpayers who hold, or have held, offshore assets (including bank accounts) that have produced taxable income/profits but have not been disclosed to HMRC, either deliberately or accidentally. Although the introduction of the European Savings Tax Directive in 2005 may mean that bank account interest in recent years has been accounted for, HMRC is interested potentially in undisclosed liabilities going back as far as 1989. HMRC is not only concerned about details of untaxed income or profits arising overseas, but also wishes to determine the original source of the funds and assets held.

The key features of the scheme are as follows:

1. Notification of intention to disclose can be made between 1 September and 30 November 2009 only (this can be done online only after 1 October 2009).
2. When notifying your intention to disclose you will receive a disclosure reference number (DRN).
3. The disclosure of tax, interest and penalties using the DRN must be made between 1 September 2009 and 12 March 2010.
4. There are different disclosure windows for paper and online submissions (between 1 September 2009 and 31 January 2010 if paper and between 1 October 2009 and 12 March 2010 if online).
5. Your agent can make the disclosure on your behalf, but you will have to confirm its accuracy.
6. The disclosure may have to cover several years, up to a maximum of 20 years.
7. Disclosures will normally carry a fixed penalty of 10%.
8. If you received a letter from your bank as part of the Offshore Disclosure Opportunity, you may have to pay a 20% penalty.

9. People found to have tax liabilities relating to offshore assets/accounts who don't come forward can expect significantly higher penalties.
10. No penalties are charged where the tax liability is less than £1,000.
11. Full payment of all tax, interest and penalties must accompany the completed disclosure.
12. It may also be necessary to review domicile and residency status when considering the necessity for, and breadth of, any disclosure.

Penalties will inevitably be higher if disclosures are prompted by HMRC in the future. Given the bulk of information HMRC either has or will obtain from financial institutions and its intention to cross-reference this with tax returns, it will become increasingly difficult for taxpayers to keep offshore funds free from HMRC scrutiny.

In order to be submitted, a disclosure needs to be accompanied by payment for the full amount of tax, interest and penalties as well as a signed certificate that the disclosure is correct and complete. Thereafter, HMRC will risk assess the disclosures by matching what it has been told with the data it already holds and continues to gather. HMRC will undoubtedly challenge disclosures where it has contradicting evidence. In the previous Offshore Disclosure Facility in 2007, HMRC set a deadline of March 2008 to

respond to submissions with notification of any further enquiry; with the NDO, HMRC has stated that the majority of submissions will receive letters of acceptance within four months of the close of the facility. Any cases considered high risk could be selected for investigation throughout 2010 and 2011, meaning a lack of surety for tax payers.

It can take time to gather the information required to support a disclosure; obtaining bank statements and information from offshore institutions can be a slow process, so early action is recommended to those who have something to tell HMRC. If information is no longer available, estimates or projections back from more recent years are required, along with explanation and justification. Determining the right liabilities, interest and penalties is a job for experts, particularly if there are complex issues such as domicile. There are no prizes for overpaying as a result of miscalculating liabilities in the rush to disclose, as there will be no formal avenue to reclaim any overpayments.

If you know someone who has undeclared tax liabilities relating to offshore assets (including bank accounts), you should advise them to call PricewaterhouseCoopers' 24 hour helpline on 0800 3288215.

## 'Working together', with HMRC's Brian Redford

Ronnie Pannu asks Brian Redford, deputy director of HMRC's business customer unit about the changes in HMRC's approach to communicating and working with tax agents.



### **What has been your main area of focus since you took over this role?**

My main focus is how the department can maintain and enhance the vital relationships which exist with agents and how we can work together to make the operation of the tax system run more smoothly.

As we have moved from a local to a national business model, one of the major consequences has been the loss of the relationship which used to exist between the local agent and a local tax inspector. The feedback I have received is that these local relationships really helped agents to resolve issues and avoid potential disputes, and part of my role has been to explore how we can reestablish a local connection in a way that benefits both tax agents and the department.

This has been the drive behind the reinvigoration of the Working Together (WT) programme. As many of your readers will know, WT was set up in the late 1990s as a way for local agents to meet with local HMRC officers to explore issues and voice concerns. While a lot of good came out of this model, the feedback I received shows that the impetus and focus on resolving issues was lost over time. The new WT programme, launched in May this year, is more structured and focuses on resolving the issues which tax agents and their clients face when dealing with HMRC both at a local and national level.

Sixty-five HMRC officers have been appointed nationally to lead the HMRC input into the WT groups, and we believe they have the right skills, experience and seniority for this important role. We have also ensured these officers have the necessary time and resources available to deliver the role and commit to their local agent population.

### **What is different with the new WT programme?**

The main difference is a more structured focus on resolving issues which are of concern to a wide population of tax agents. To ensure the department makes best use of its limited resources, the new WT model follows the idea that an agent not only attends the WT meeting on their own behalf, but also for a larger population of local agents. So, for example, you could attend in your role as a representative of a professional institute, on behalf of your firm or because you have an informal network of contacts with whom you can share issues or developments. In this way, we can hope that what goes on in the WT meetings is shared widely among the local agent community and that their issues and concerns are being voiced and addressed.

In the past, some have criticised our speed of response to issues raised. Going forward, we will be providing regular updates of progress on the issues raised, initially through the WT groups but in the long term we would like to make

that more widely available. If an issue is escalated, then it will be put on a national database, which will be regularly updated so progress can be tracked and the final outcome communicated. If the issue cannot be fixed immediately, we will let agents know when they can expect progress.

As well as reporting when they are unhappy with something, we also want agents to let us know topics that their group would like more information about; for example, more information on family tax credits or the new information powers regime. We can then look at how best to deliver this information to the WT groups so they can share it among the communities they represent.

## What else is going on at HMRC?

We are currently putting in place a number of agent account managers (AAMs) as local points of contact for agents across the UK, partly to help resolve issues but also to help agents improve their understanding of HMRC and where they can support their clients. In addition, we are trialing client relationship managers (CRMs) who will work with agents who require assistance in sorting transactional problems when other routes of escalation have been tried. They are attached to six of our major processing centres in the UK and providing valuable feedback on where our services can be improved. These services complement the introduction of dedicated agent telephone services which are tailored to meet their specific needs for times of access and technical support.

All these initiatives and pilots are aimed at ensuring we have an ongoing dialogue with agents about the issues that concern them and their clients most. I would also like to think we can use this medium to hear back on some of the positive experiences agents have when interacting with the department.



Finally, we have been exploring ways in which HMRC can work with tax agents to help them reduce the amount of common errors in tax returns (and therefore a reduced risk of their client receiving an enquiry letter). We are producing a suite of risk 'toolkits' which can be accessed by an agent according to the specific issues and circumstances relevant to his clients. We are currently piloting one which deals with common issues around capital gains tax and trusts, as we know that this is a complex area and can cause agents some difficulty.

By being more open about the types of errors and risks we assess when presented with information and returns, and sharing this with agents in a way

that is easy to understand, we should be able to reduce the number of mistakes that our agents' clients face.

Details of the new Working Together pack and other services for the agent community are available on the dedicated agent area of the HMRC website.

# The 'VAT Package': What do the revised rules mean for your business?

This article updates our previous commentary on the 'VAT Package' and considers the practical aspects and consequences of a) achieving compliance and b) non-compliance with the new requirements.



The first stage of the VAT Package's implementation takes effect from 1 January 2010. Businesses supplying and/or receiving cross-border supplies of services should take immediate action to achieve and demonstrate compliance with the new rules.

1 January 2010 will see the following:

**Revised rules determining where a supply of services is taxed.** The key change is the new basic rule taxing cross-border supplies of services received for business purposes in the country of receipt (previously, the country of supplier's belonging).

**Additional reporting requirements** – European Sales Lists for Services (ESLS) to be submitted in each country from which the business supplies intra-European Community (EC) cross-border services; broadly similar to the current declarations for such supplies of goods. There will be penalties for non-compliance, see next page.

A number of further changes to the place of supply rules will take place at various points between 1 January 2010 and 1 January 2015; for example, on 1 January 2015, the place of supply of certain services by EC businesses to private individuals will also move to the country of consumption.

So, practically, what needs to be done? Why act now, instead of several months time, or even after 1 January 2010?

Put simply, we are now becoming aware of how each EC member state will implement the new rules. Additionally, each impacted business will be required to make systems and process changes in support of the new law. The latter often requires a minimum of six months to implement; we are already well within the six month period leading up to 1 January 2010.

The following actions offer a potential methodology for managing the necessary technical and systems changes.

1. 'Impact assess' the VAT accounting changes to be made.
2. Identify the relevant EC countries from which the business makes and receives cross-border supplies of services. This is crucial as each member state's implementation could, as currently, vary significantly.

Administratively, how often will each state require ESLS to be submitted? It is vital that any general overview of the revised rules is complemented by an understanding from all impacted staff of each country's requirements.

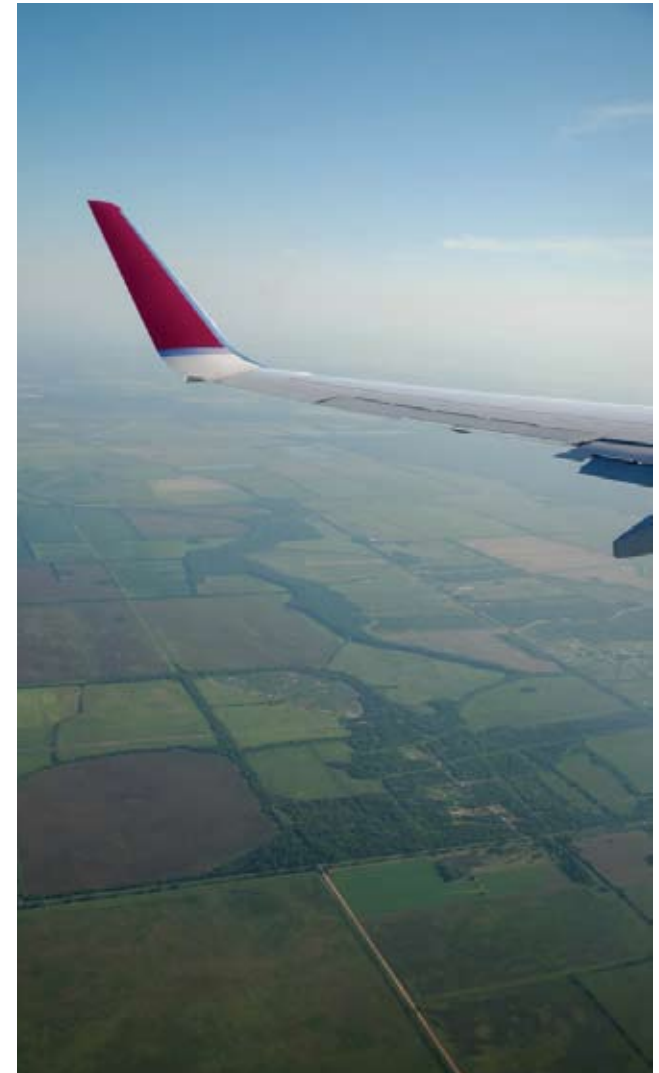
3. Review current systems supporting cross-border service transactions in each country, again identifying necessary changes. As ESLS are a new requirement, this is at least one such change. This, and revisions to VAT accounting for certain services made and received, should be implemented and tested in advance of 1 January 2010.

What are the consequences if the VAT Package is not managed effectively along the above lines? The following financial penalty risks in each of the 27 EC countries are potential:

**Tax geared penalties** – through failure to account for VAT (including self-accounting under the 'reverse charge' procedure). Taking the UK as an example, can you demonstrate reasonable care, as there has been advanced publication of the UK's new rules? Have all necessary changes further to the VAT Package been successfully implemented in order to support a valid Senior Accounting Officer declaration?

**Administrative penalties** – failure to either submit ESLS, or to submit complete and/or accurate ESLS. Consider current penalties for non or incorrect submission of EC Sales Lists for goods; a single failure could lead to a penalty exceeding €10,000.

The time periods required to design, implement and test VAT accounting and systems changes are lengthy; if businesses have not already begun planning for these changes, then they should ensure readiness for 1 January 2010 and beyond as a matter of urgency.



## Who wants to be a Senior Accounting Officer?

The dust seems to have settled on one of the most surprising – and for some unwelcome – administrative measures to be announced in recent Budgets: the Senior Accounting Officer (SAO) regime.



Finance Bill 2009 provisions require SAOs of groups with a UK turnover of £200m or £2bn gross assets to take reasonable steps to establish and maintain appropriate tax accounting arrangements. These are arrangements which enable all relevant tax liabilities for affected taxes (corporation tax, VAT, PAYE [excluding National Insurance contributions], stamp duty reserve tax, stamp duty land tax, insurance premium tax, petroleum revenue tax, customs and excise) to be calculated accurately in all material respects.

Only UK registered companies meeting the turnover or asset tests are within the measure and UK branches, partnerships (including LLPs), charities, Crown Estates and public bodies are excluded.

The measure also requires the SAO to certify that the tax accounting arrangements are appropriate or, alternatively, to identify the respects in which they are not appropriate. The certificate must normally be submitted to the Customer Relationship Manager (CRM) no later than the accounts filing date for the financial year in question.

The legislation does not define ‘material respects’, but HM Revenue & Customs (HMRC) has made it clear that it is not analogous to the concepts of accounting or audit materiality. Although this lack of a definition is not helpful, HMRC’s guidance suggests that small or insignificant errors are unlikely to cause a failure under the main duty, unless such errors prove to be repetitive and more significant over time.

The measure will come into effect when the Bill receives Royal Assent and will apply to the arrangements in place for the first financial accounting period starting after Royal Assent. HMRC has provided some leeway in terms of commencement of the provisions, whereby in the first accounting period – provided that the SAO has initiated a review of the tax accounting arrangements – reasonable steps will be deemed to have been taken. This welcome breathing space should at least make it practical for groups to undertake any work

needed to respond to the measure in time.

In this respect it’s worth pointing out, say for a 31 December year end, that in the first year (31 December 2010), the measure applies to arrangements for finalising the 2009 accounts and preparing 2009 tax returns during that period: not just the 2010 accounts.

Penalties of up to £5,000 each may be imposed on SAOs personally, in respect of both a failure to comply with the main duty and to provide a certificate. A company may also incur a penalty where it has failed to notify the name of the SAO to HMRC. These penalties can be appealed against on the grounds of ‘reasonable excuse’.

While HMRC has been at pains to indicate the measure does not raise the bar in terms of standards and have gone to some lengths to try and reduce the impact of the measure, even businesses with apparently ‘good systems’ are finding the need to carry out documentation and gap analysis work. Engagement with CRMs will no doubt assist in its practical enforcement, but there is no doubt that the process of sign off and the potential for personal penalties have concentrated minds on the what constitutes appropriate tax accounting arrangements at senior levels within large businesses.

# Autumn seminars

How have the changes in HMRC’s compliance approach, powers and penalties impacted on you and your clients and what will these changes mean in the future?

In our autumn seminars, our experts will provide an update on recent developments in the field of tax disputes and investigations. Topics for discussion will include the following:

- An examination of how the enquiry regime continues to change and what the changes mean for tax advisers and their clients
- An explanation of the nature of a compliance ‘intervention’ and how that differs from HMRC’s traditional enquiry approach
- How the ‘risk assessment’ process is driving HMRC’s compliance efforts
- What you need to know about the New Disclosure Opportunity (NDO)
- A review of changes to the settlement of disputes, with the introduction of the new tax tribunals and HMRC’s statutory internal review process
- A discussion on some important changes to assessing and claims time limits and the process for claiming back overpaid tax

Registration will be from 5.00pm. Seminars start at 5.30pm and finish at 7.00pm.

To register, visit

## London

Thursday 12 November  
Harrow  
Grims Dyke Hotel

## South & West

Tuesday 3 November  
Gloucester  
The Chase Hotel

Thursday 5 November  
Bristol  
PwC – Great George Street

Tuesday 10 November  
Swansea  
PwC – Llys Tawe

Wednesday 11 November  
Cardiff  
PwC – One Kingsway

Wednesday 18 November  
Southampton  
PwC – Savannah House

## Midlands

Tuesday 3 November  
Derby  
Pride Park Football Stadium

Tuesday 10 November  
Wolverhampton  
Molineux Football Stadium

Thursday 12 November  
Lincoln  
Bently Hotel

Tuesday 17 November  
Birmingham  
Birmingham City FC

Tuesday 24 November  
Leicester  
Leicester Marriott

## North East

Tuesday 3 November  
Leeds  
PwC – Benson House  
Thursday 19 November  
Harrogate  
Cedar Court Hotel

Thursday 5 November  
Bradford  
Cedar Court Hotel  
Tuesday 24 November  
Newcastle  
Newcastle United FC

Thursday 12 November  
Sheffield  
The Source at Meadowhall  
Thursday 26 November  
Brigg  
Forest Pines Hotel

## North West

Tuesday 10 November  
Chester  
Grosvenor Pulford Hotel

Tuesday 17 November  
Manchester  
PwC – Barbirolli Sq

Wednesday 25 November  
Liverpool  
Crowne Plaza Liverpool

## Scotland

Thursday 26 November  
Glasgow  
Park Inn

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# Just because your bank account's offshore doesn't mean it's off limits

The Chancellor has announced a New Disclosure Opportunity (NDO) for UK residents with unpaid tax connected to offshore assets. The NDO will run from the 1 September 2009 for a limited period to give the offshore account holders one final opportunity to disclose, and put their affairs in order.

We have set up a dedicated helpline for anyone who may be affected to talk to PwC experts.

If you would like more information, please call our 24-hour helpline on 0800 328 8215, email us on [tax.investigations@uk.pwc.com](mailto:tax.investigations@uk.pwc.com) or visit our website [www.tax-investigations.com](http://www.tax-investigations.com)