



TAX DISPUTE RESOLUTION SERVICES

Tax investigations

HMRC has an ever-increasing focus on ensuring all taxpayers comply with their obligations, and with the increased use of technology to analyse data and the exchange of information through multiple formal channels, HMRC's investigations are becoming better-targeted and more effective.

HMRC's enquiries can be disruptive, intrusive and costly to you and your business, even where there is nothing wrong. Our TDRS specialists use their experience and skills to mitigate the impact of an investigation on you.

Our aim from the outset will be to determine the risks identified by HMRC and propose a suitable strategy to address their concerns in the most efficient manner. We will establish the key facts and provide HMRC with only the necessary evidence to demonstrate those facts with a view to reducing the time it would otherwise take to close HMRC's investigation.

In the event further tax is found to be due, our specialists are well placed to mitigate the financial impact, through effective negotiation in respect of the number of years for which HMRC will seek to collect tax and the level of penalties to be applied.

We can advise on investigations in respect of all heads of tax, including Income Tax, Corporation Tax and Capital Gains Tax, Inheritance Tax as well as PAYE and NIC.

If the case is complex or serious and is to be handled by HMRC's Fraud Investigation Service, our specialists have the relevant experience to deal with enquiries under Codes of Practice 8 or 9.

We regularly provide advice to individuals, companies, partnerships and trustees and are happy to work directly for you, with your existing adviser or through an intermediary

Specific areas of support

Our TDRS team can provide advice and support in respect of all interactions with HMRC, including:

- S9A enquiries into personal tax returns;
- para 24 enquiries into corporate tax returns;
- employer compliance reviews;
- cross tax enquiries;
- civil investigations of fraud (COP9);
- HMRC assessments, including discovery assessments;
- voluntary disclosures;
- overpayment relief claims;
- penalty negotiations;
- accelerated payment notices & partner payment notices;
- follower notices;
- HMRC's information powers;
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Disclosures

If you have a disclosure to make to HMRC, we will establish contact with an appropriately experienced person within HMRC, thereby ensuring the matter can be settled with the minimum amount of disruption.

Dispute resolution

On occasion, taxpayers find they are unable to resolve their disputes with HMRC. Whatever the reason for your disagreement, we have significant experience in managing disputes and can represent your interests in taking the matter forward.