



Tax investigations and disputes: Achieving the best outcome

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The crackdown on tax evasion and avoidance has resulted in an increasing number of tax disputes with HM Revenue & Customs (HMRC).

We understand how stressful and frustrating a dispute with HMRC can be. Our award winning team has many years' experience and significant expertise in dealing with HMRC.

Our aim is simple – negotiating a favourable and tax-compliant settlement with HMRC on your behalf, whilst minimising disruptions to you.

HMRC measures

Emphasis on tackling tax evasion and avoidance at national and international levels has led HMRC to:

- extend their powers, including the power to seize taxpayer's bank funds;
- invest in new technologies such as the CONNECT system which draws taxpayers information from Government and corporate sources;
- aggressively challenge tax avoidance arrangements which it considers artificial, notwithstanding additional reputational risk to individuals/businesses from a moral standpoint;
- sign up to information sharing agreements such as the Common Reporting Standard.

The message from HMRC is clear – there's no place to hide.

How does this affect me?

If you need to make a voluntary disclosure to HMRC, we can help you by:

- advising the best disclosure route;
- assessing the time limits and HMRC's administrative processes;
- mitigate the penalties charged;
- negotiating a full and final settlement with HMRC.

HMRC investigations can be complex and wide-ranging (from corporation and income tax, PAYE and VAT), we can provide you with crucial specialist advice, including:

- review any potential tax irregularities or assess your technical position;
- liaise with HMRC and attend any meeting with HMRC and you, or on your behalf;
- advise on, or manage the process (for example, use the Contractual Disclosure Facility (CDF) for cases of serious fraud);
- prepare a disclosure on your behalf and negotiate a settlement with HMRC.

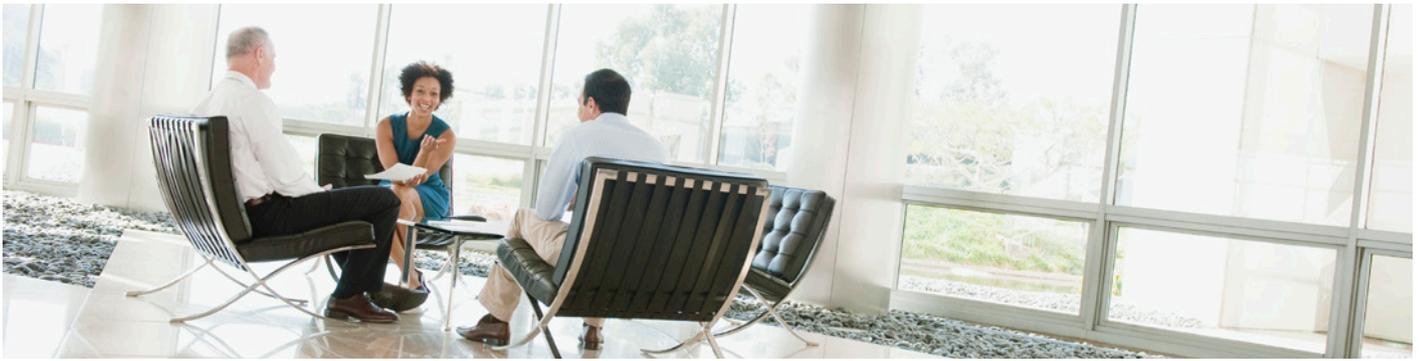
We are experienced in working with lawyers whose clients were under criminal prosecution by HMRC and have successfully moved cases to the civil process.

If through other intervention you cannot reach agreement with HMRC (whether in respect of the tax, penalties or interest), our team can discuss the options for resolving the dispute, this may involve:

- further dialogue with HMRC (e.g. internal HMRC review);
- alternative dispute resolution (ADR) – a mediation process suited where a range of outcomes are possible under tax law. Costs are relatively low compared to litigation and are shared with HMRC;
- litigation before the tribunal.

Other tax dispute resolutions services we can help you with include:

- review of Accelerated Payment Notices and Follower Notices and offer you a pragmatic and honest assessment;
- negotiate with HMRC to agree a settlement on tax schemes where appropriate (e.g. contractor loans);
- agree Time to Pay Arrangements with HMRC on your behalf, in respect of tax debts;
- prepare expert witness reports on a technical and impartial basis on a range of contentious tax issues;
- a Tax Investigation Service (TIS) to protect clients who suffer a tax enquiry.



“I was very happy to be introduced to Moore Stephens 40 years ago and have never looked back. I’ve always slept at night knowing Moore Stephens are looking after my tax affairs.”

Non-domiciled individual

Why Moore Stephens

Access to the right people



Our team members are CTA ATT qualified or trained HMRC inspector of taxes. We also draw on the skills of in-house experts across all areas of tax and non-tax disciplines so decisions can be made quickly and confidently.

A consistent team



Although we draw upon the expertise of other departments, you can be confident that you will see a consistent team throughout your case so things get done more effectively.

Awards



We have an excellent track record in tax investigations and disputes and are recognised for our expertise in the industry.

Our team won the award for ‘Best Tax Investigation Team’ at the prestigious Tolley’s Taxation Awards.

Moore Stephens was also named ‘Accountancy Firm of the Year’ at the City AM awards.

And, two members of our Tax Investigations & Disputes team, Matthew Watkins and Davina Boodnah, were identified as rising stars in the field of private client services.

Support & guidance



Our specialism is in handling tax investigations and disputes (including ex-HMRC experience) and as your circumstances change. We will give you all the support and guidance you need in dealing with new risks and opportunities.

Network coordination



We operate across a wide range of sectors and coordinate advice from our global network of offices in more than 100 countries to ensure that your overseas tax matters are dealt with efficiently.

Here are some of our recent accreditations:



About Moore Stephens

We help you thrive in a changing world.

We provide all the support and guidance you need to deal with new risks and opportunities. We ensure easy access to the right people, so decisions can be made quickly and confidently. A consistent team will partner with you to support your aspirations and contribute to your success.

You'll have access to a range of core services, including audit, accounting, tax, risk and systems assurance, corporate finance, restructuring and insolvency, wealth management and disputes analysis. As a Top 10 accounting and advisory network we support a broad range of individuals and entrepreneurs, large organisations and complex international businesses.

If your business and personal interactions need to expand, we'll help make it happen – coordinating advice from a network of offices throughout the UK and in more than 100 countries.

Contact information

If you would like further information on any item within this brochure, or information on our services please contact:



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