Think Ahead ACCA

Making tax digital: Tax administration

A public consultation issued by HM Revenue and Customs

Comments from ACCA to HMRC
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ACCA welcomes the opportunity to comment on the proposals issued by HMRC. The ACCA Global Forum for Taxation and UK Tax Committee have considered the matters raised and a large number of ACCA Members and businesses have contacted us with their comments. Their views are represented in the following. This response should be read in conjunction with the comments made on the HMRC MTD consultation suite.

GENERAL COMMENTS

The proposals for Making Tax Digital ("MTD") and the associated £1.3bn investment in HMRC systems changes are the most significant tax project of recent years, and probably the single government project with the widest and deepest short to medium term impact on the population in general. There are three principle aspects to the tax system – the legislation that imposes the charge, the forms and mechanisms that enable assessment and communication of the charge, and finally the payment processes that facilitate collection of the charge – and MTD for business will affect all three.

ACCA has engaged with HM Treasury and HMRC from an early stage on the Making Tax Digital proposals, and we have significant concerns that the transition to quarterly reporting, and potentially payment, of taxes will create difficulties for many sectors, transactions and tax rules.

While this consultation is not directly a part of the MTD programme, and the measures contained in it could be implemented entirely independently of MTD, there will be an inevitable interaction between them. Where specific benefits can accrue from such interaction we have attempted to identify them, and likewise to warn of potential risks which may arise from imposing upon individuals who have little or no technological literacy a requirement to maintain fundamental accounting records using unfamiliar equipment and processes.

We welcome HMRC's commitment to explore mechanisms for simplifying tax compliance, and the recognition that in some cases simplification may have a small negative impact on cash flow of tax receipts which may nevertheless be outweighed by the wider benefits to society. We would urge HMRC to consider all the tax measures they are proposing in the context of the wider societal impacts. Tax systems exist for the benefit of society, not the other way around, and should be designed on that basis.

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While there is much merit in many of the practical proposals for updated mechanisms to operate the reporting and collection of tax in the UK, what is less clear is how HMRC would transition its own rights and obligations, and those of the taxpayers involved, from the existing legislative models to the new Acts which would be required.

Tax is at its heart about the allocation of wealth between state and individual for the broader benefit of society, and as such it must be based on a clear, comprehensive and consistent framework of law. The current powers under TMA1970 operate in respect of a single aggregated annual individual return supported by computations which are themselves based on records which can be kept in any format. Although the consultation documents set out genuine potential advantages which new technological reporting mechanisms (based on ad hoc transmission of digital reports into a central HMRC accounting record) could offer, there is little or no analysis of how the initial enabling legislative framework is to be developed which would be needed to underpin those new mechanisms, and the consultations do not directly address the fundamental incompatibility of HMRC's existing powers and taxpayers' existing rights and obligations with the proposals. With tax simplification being an aim of future tax reforms our initial analysis of the proposed changes is that the complexity and volume of tax administration legislation will significantly increase.

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AREAS FOR SPECIFIC COMMENT:

Chapter 2

Question 2.1: Do you agree that compliance legislation should be amended to replicate current enquiry powers into the Self Assessment return to the End of Year declaration?

Yes. The end of year declaration must stand in the shoes of the current SA return if we are not to have a wholesale rewrite of the entire principles of the machinery of tax assessment/liability creation. That should of course happen, as the underlying mechanics predate self-assessment, independent taxation and the concept of electronic service/communication, but it is not viable to complete it in the timeframe before imposition of interim reporting. There will in any even need to be additional provisions to replicate the s8, 9 and 12 aspects of TMA 1970 in order to trigger the obligation to report, define the format of the report, and set up the requirement to keep records (and confirm the form of those records).

Question 2.2: Do you agree that current HMRC and customer safeguards should also be maintained?

Question 2.3: Are there any other options for preserving HMRC's current enquiry powers in MTD?

The existing safeguards should be maintained at the very least, if not enhanced. In particular consideration should be given to the particular requirements and impositions of electronic filing and the creation and maintenance of all underlying business records in electronic format.

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Question 2.4: Do you agree with the proposed approach to replicate HMRC's compliance powers for determinations, corrections, information powers and discovery assessments?

The current balance of powers and safeguards has been the outcome of prolonged discussion, development and refinements and should not be significantly altered without an initial comprehensive review and evidence gathering process. However, a few specific points do need to be made about the current proposals and process:

- The timing of the consultation is perhaps unexpected. We do not yet have any clear picture of how the period-end confirmation process is going to operate. Presumably the basic mechanism will need to replicate the legally certain outcome of the s8 TMA triggered self-assessment process, but without the requirement for an actual "return" to be filed. The alternative route of assessment under HMRC's s30 TMA powers would not appear appropriate since the s59 TMA payment mechanisms are incompatible with that basis of assessment. While the legal provisions for creating and filing the self-assessed information under the MTD interim/final reporting process are unclear it seems premature to try to finalise the penalty mechanisms for failure to comply with those provisions.

- It seems quite clear that the whole apparatus of assessment under TMA 1970 will need to be fundamentally revised to accommodate the new regime. Particular points of difficulty will be: s8 Notice is predicated on all information for the fiscal year being available; inherent in s9 requirement for self-assessment. S12B information powers are inappropriate for fully digital process – are HMRC mandating the digital formats, and if so are they intending to do so via regulations laid under s12B(3) (as modified) or an equivalent?

- Serious consideration should be given to the design of the Discovery Assessment regime in respect of businesses which might be obliged to keep records in HMRC approved format, connected to a software portal feeding directly to HMRC's systems. Given HMRC's high profile data gathering and analysis programmes such as Connect and the additional powers granted to gather information from third parties, both in the UK and overseas, the balance of power between taxpayer and inspector has shifted considerably since the regime was initially developed. Prepopulation of tax

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information into the taxpayer's account will affect the extent to which the taxpayer has control over the entries on which their tax is calculated. A number of tribunal cases have in any event indicated a different understanding between HMRC on the one hand and taxpayers, their advisers and the tribunal on the other of how the existing powers are supposed to be used.

- There is a significant concern about the extent of HMRC powers in respect of the digital records which apparently will be required in order to supply the interim updates as well as the final confirmation statement in respect of each period of account for each source of business income assessed under the new regime. Our understanding based on HMRC roadshows, publications and statements is that there will be no legal requirement to hold digital records as such. However, there will be a requirement to transmit interim reports to HMRC (quarterly at least, but more frequently if the business would prefer, although this will result in an obligation to file more than four interim reports in respect of the year) in a digital format based upon transactional data analysed to a level of detail which HMRC apparently believe would make any other form of record keeping unduly onerous. For the very smallest or least computer literate businesses there will be no easy answer; they will have to abandon existing practices or face a doubling of administrative burden. While HMRC are clearly of the opinion that tax is so important it justifies fundamentally altering the way that businesses do business, very few businesses themselves appear to share this opinion, considering instead that efficient operation with a view to creating a trading profit is the underlying imperative for any business record keeping system. Up until now, HMRC has not concerned itself with how taxpayers comply with their self-assessment obligations provided that they have been able to do so accurately and on time, and retained sufficient evidence to demonstrate that they have discharged their obligation to society by paying the taxes due on their business activities. Under MTD, HMRC are proposing to reach into the inner workings of taxpaying businesses and force them to redesign the very profit making mechanism itself. HMRC are however not proposing to enquire into the interim reports which rely upon this level of detail, which begs the question of why the format is so important to HMRC if they are not proposing to interrogate that data themselves. If they are, then the powers regime will need updating to reflect that. If there is no intention for HMRC to interrogate the underlying data then it is hard to discern the rationale behind imposing that costly change on business.

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- Can we now expect specific regulations to be laid under TMA1970 S12B (3A), along with repeal of S12B(4) and suitable modification of S12B(5A)?

- We understand that VAT reporting will require returns under MTD holding more information than is needed to comply with VATA requirements to make a return. On what statutory basis is that information 1) going to be demanded, 2) going to be held and 3) going to be used (whether in respect of the taxpayer themselves or other taxpayers)?

Question 2.5: Do you have any other comments on how compliance powers need to change to transition to MTD?

There is considerable uncertainty around the implications for VAT of Brexit. VAT currently operates on a "quarterly end-of-year" model in effect, while it appears that the ultimate policy aim of MTD is a move to a pure interim, "whenever you feel like it" model. That is incompatible with the current model of VAT, since an early submission is as invalid as a late one for VAT quarters. Moving VAT to the fiscal year would not necessarily appear appropriate as it is a transaction based tax. Alternatively, businesses could be left a completely free choice; one of the proposals for business basis periods is that an individual can run as many as they want, which need not be coterminous. All of this is however dependent upon a radical transformation of the VAT process, which may be less attractive if considerable resource has been invested into developing MTD for VAT based upon the current processes.

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Chapter 3

Question 3.1: Do you agree that 12 months is an appropriate length of time to allow customers to become familiar with the new obligations before the new penalty regime comes into effect?

We do not believe that quarterly reporting should be mandatory. In answer to the question raised - No; it is too short, especially alongside all the other complexities of MTD. This is a bigger change than RTI, and hitting a far wider (and less organised) population. Soft landing should run for two years at the very least.

"To require such businesses to conform to these proposals and to penalise them for any failures demonstrates a total ignorance of how small businesses actually work in the real world. These businesses are:-

- *usually owner managed;*
- *already working substantially longer than the "normal" working week;*
- *struggling to maintain their records to an acceptable standard;*
- *do not have the benefit of any accounting or taxation training – or (in many cases) any computer / digital training;*
- *the smallest businesses will often be preparing their records late in the evening or at weekends;*
- *already having to deal with the huge extra compliance from an inflexible RTI system (the costs of which are borne by the businesses and not HMRC);*
- *already having to deal with an equally inflexible auto-enrolment system (the costs again being borne by the employer);*
- *currently having to deal with the (unnecessary) transition to FRS 102 and the additional costs that this change is creating.*

Leaving aside the question of the massive intrusion of the state in to the lives of ordinary people, these proposals are simply one step too far."

ACCA Member feedback

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Question 3.2: Do you agree that the period to wipe the slate clean should be 24 months? If not, what other period would be appropriate?

24 months is probably a suitable starting point, although given the frequency and volume of transactions with HMRC under the new regime a shorter interval such as 12 or 15 months might be more appropriate. Any longer would be unfair. That said, taxpayers with even vaguely complex affairs (eg any partner with dividend income) are going to have a welter of overlapping submission deadlines and timetables resulting in considerable complexity around any universal penalty regime.

We would also suggest a rolling removal process (similar to driving licence penalty points) rather than holding points over the taxpayer's head potentially for 8 years. This would be particularly important if HMRC proposed not to allow appeals until a penalty is actually triggered; if the only appealable event had been the very first, a taxpayer could be forced to appeal an eight year old set of circumstances under the proposed regulations, which does not appear reasonable.

Question 3.3: We invite views on the design principles outlined for the points-based penalty. For example, do you consider there are any further elements to build in to this basic model?

It is absolutely essential that HMRC designs the system so that agents have full transparency of any penalties charged and the reasons for them. Agents have a vital role to play in ensuring on the one hand that clients understand why a penalty has been incurred and on the other that the penalty is in fact appropriate, and that there are not extenuating circumstances which the taxpayer may not be able to properly to articulate to HMRC which obviate the penalty.

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Question 3.4: At what stage for each of these different submission frequencies should points generate a penalty?

The question highlights the difficulty in trying to develop a penalty model before it is clear what the practical obligations under the new model will be, and before it is fully developed. If MTD is truly to represent a simplification for taxpayers the it should ultimately be the case that businesses need only make one submission of business tax related data each quarter, from which HMRC are able to derive all business related tax liabilities. Clearly this aim is some way off, but once achieved it will remove the complexity in the penalty regime. Until the underlying basis of filing and reporting requirements is streamlined and aligned (whether in conjunction with a requirement to file in particular electronic format or not) any transitional provisions relating to reform of the penalty regime will face significant hurdles.

Question 3.5: We would welcome comments on whether existing penalties are sufficient to support compliance with occasional filing obligations. If not, what more is needed?

While there are some shortcomings with the existing model for occasional returns, many aspects of that regime are already under review and subject to alteration (for example acceleration of tax payment deadlines for CGT on residential property) and it does not necessarily seem sensible to propose wholesale reform to that area as well while a) changes to other aspects of the tax system are uncertain or still bedding in and b) civil service and taxpayer resource can perhaps be more profitably employed elsewhere.

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Question 3.6: Do you agree that, in principle, a single points total that covers all of the customer's submission obligations is the right approach?

On balance, yes. Taxpayers tend to view HMRC as an homogenous body; those who appreciate that it is not should be sophisticated enough to understand their obligations anyway.

Question 3.7: Do you agree that the proposal outlined in paragraphs 3.25 to 3.28 is the right way to operate a single points total? If not, what alternative would you suggest that ensures the design of the penalty is kept simple?

The proposal would appear to have the (perhaps unintended benefit) that a taxpayer with an otherwise unblemished compliance record who has a liability to file five different submissions within a single calendar month but who for some reason beyond their control is unable to do so would incur only a single penalty point, and hence be relieved of the need to lodge an appeal. It would also have the feature that a taxpayer with the same number of calendar month obligations could file fifteen sets of information late over a 9 month period without triggering a penalty.

Given that one of the aims of MTD is to align and streamline reporting obligations, it might be more useful to restrict the "at the same time" condition to HMRC filings due by the same day. Introducing scope for taxpayers to elect for alignment of their filing deadlines would introduce a further opportunity for HMRC to highlight the potential benefits of ad hoc reporting, and also to educate taxpayers on other aspects of the new regime while their attention is engaged on tax matters.

Question 3.8: We welcome views on whether the escalator model would be a more effective way of aligning with the five principles described in paragraph 3.2?

No; it would rapidly become far too complicated for taxpayers to follow.

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Question 3.9: Do you agree that a fixed amount penalty is appropriate?

Yes, in the sense that it should be capable of determination independently of the particular failure involved. Taxpayers should be aware of the consequences of their actions and there should be a degree of simplicity in the process.

Question 3.10: Should the amount of fixed penalty reflect the size of a business?

No; it should reflect the income tax liabilities of the business, which are the best proxy HMRC has to profitability – which indicates firstly availability of funds to pay penalty, and at a second level the level of financial resource available to divert to satisfying HMRC's administrative requirements, which is in turn a proxy for culpability in failures. A low margin business which cannot afford to pay vast sums for its tax administration should not be punished for that (which is why VAT liabilities are not an appropriate measure). If the practicalities of such a design prove irresolvable, (for example because the liability will be dependent on the outstanding information) then there should be a standard fixed penalty. The inconvenience of paying/appealing the penalty when allied to the knowledge the business's risk register rating will be affected by repeated non-compliance will be as relevant to bigger businesses as the quantum of penalty.

Question 3.11: Do you agree that points should only become appealable when they have caused a penalty to be charged?

No. A taxpayer with three correctly appealable single points who then incurs a further penalty point will be faced with making (at least) 3 simultaneous appeals potentially some time after the events which prompted them. Having to regularly appeal points will be just as much an incentive as accruing them; rolling them up to a point where a penalty is (incorrectly) charged does not reduce the overall administrative burden.

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HMRC also say this, on which they decline to invite comment:

Penalty for a deliberate failure to make a submission

3.38. For some tax regimes we currently have the ability to charge tax-geared penalties where, by failing to file a return, the customer deliberately withholds information about their tax liability. We consider HMRC will continue to need this stronger sanction to respond to customers who will not play by the rules. The government therefore proposes that a penalty calculated according to the amount of tax involved may be appropriate where there is sufficient evidence to support a decision that a customer deliberately failed to meet a submission obligation in order to withhold information that would otherwise lead to a tax liability. This tax-geared penalty for a deliberate failure would be calculated as a percentage of the tax that would have been due if the submission had been made, but would take account of any fixed penalty charged using the points based system. It could be charged before the total number of points accumulated had reached the level that would cause a fixed penalty to be charged. Failures to make information-only submissions would not be liable to the penalty for deliberate failure. The amount of a tax-geared penalty would be reduced where a customer who has deliberately failed to meet a submission obligation helps us to establish the correct amount of tax due.

While this proposal reintroduces complexity, it does nevertheless seem reasonable that HMRC should have an appropriate mechanism to be able to influence deliberate defaulters.

Chapter 4

Question 4.1: Do you agree that 14 days is an appropriate length of time to allow customers to either pay in full, or make arrangements to do so before penalty interest is charged?

14 days is a reasonable period of time before penalties start to accrue, and will reduce the need for appeals/correspondence where banking failures or other matters beyond

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the control of a prudent taxpayer result in a properly budgeted for payment failing to reach HMRC on time. As such, it represents a reasonable balance between reinforcing for taxpayers the obligation to pay taxes on time and allowing for practical considerations to reduce administrative burdens. However, there is a clear risk that some taxpayers would see this as a 14 day extension to the payment deadline, and so HMRC should make the extension discretionary. It should be a trivial matter to implement a trigger in the software to notify the taxpayer each time a payment is made late but by less than 14 days, with a notice that after the second or third occurrence HMRC will no longer automatically exercise their discretion and interest will run from the due date. The process will be automated so will impose no further burden on HMRC, and would strike an appropriate balance for taxpayers.

Where there are genuine unexpected difficulties facing the taxpayer, 14 days may not be sufficient to allow the taxpayer to put in place arrangements to account for the tax at a later date. Accordingly there should be scope to waive interest where a TTP arrangement is put into place during some more relaxed timeframe, of the order of 2-3 months.

Question 4.2: Do you think that charging penalty interest is the right sanction for noncompliance with payment obligations?

Yes. However, HMRC must bear in mind that paying salaries might actually be a higher priority to the business than a debt owed to HMRC. The business may permanently cease to trade if salaries are not paid on time; the same is very unlikely to be true of the Exchequer in relation to any single taxpayer.

Question 4.3: Are there other commercial models that might be appropriate for us to consider?

We would urge HMRC to revisit their decision not to offer educational awareness courses, in the same model as police speed awareness courses, as a remedy for taxpayers with administrative failings. The guidance which is already available to taxpayers is of course voluntary, and there may be any number of reasons why

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taxpayers are unwilling or consider themselves unable to engage with it. To make such education and awareness effectively compulsory, or at least to make very clear to the taxpayer that there will be either a time or financial cost to administrative failures, would increase the likelihood of them attending such a course. Those who were unwilling will have to recognise the costs; those who considered themselves unable will perhaps be more likely to realise that future costs and penalties can be avoided more easily than they might have realised, simply by complying with their obligations on time.

Question 4.4: We invite views on the design principles outlined for penalty interest. For example, do you consider there are any further elements to build into this proposal?

In the current environment, a penalty interest rate of 10% definitely counts as penal. Although interest rates are currently stable, a model of base rate plus 8% would be more appropriate in the long term.

Question 4.5: Does model 1 or model 2 best meet the government's objective of providing a fair and proportionate response to late payment of tax?

A key consideration here is whether it is the penalty amount that makes the difference? Most taxpayers who are that far in arrears have other issues beyond simple cash flow – and if the issues are a genuine disagreement with HMRC then pressurising the taxpayer to settle quickly rather than accurately is counterproductive.

Question 4.6: Do you agree that the timing of late payment penalties should change to reflect the frequency of payment due dates?

Operating a model of different penalty dates based upon payment frequency would involve complexity in the model, and also result in significant potential difficulties where a taxpayer had a number of payments outstanding in respect of taxes with different

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frequency characteristics and started to make payments on account to HMRC. How would HMRC allocate the payments in order to minimise interest due?

In any event, ability to pay is not linked to HMRC's administrative processes. It is not clear why penalties should accrue more rapidly on quarterly filed VAT than income tax paid half yearly.

Question 4.7: We invite views on the design principles outlined for late payment sanctions. For example, do you consider there are any further elements to build into these proposals?
Question: 4.8: Which proposal best meets the design principles?

Model 1 under proposal B would be most appropriate for all taxes, regardless of frequency, given the additional complexity that an alternative regime for VAT would generate. The existing ability to avoid late payment penalties by reaching a "time-to-pay" agreement with HMRC must be preserved.

Chapter 5

Question 5.1: Should the current interest rules for Income Tax and Class 4 National Insurance contributions continue to apply in MTD?

Yes (although rates should be reviewed). HMRC should also consider periodically writing off amounts of less than £10 where taxpayers are not fully engaged with online payment processes. Taxpayers should not be artificially driven towards mechanisms with which they have legitimately chosen not to engage for other reasons simply for administrative convenience in tax.

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Question 5.2: Do you have any initial comments about aligning interest rules across taxes?

It is hard to see any particular argument for maintaining separate rates for anything but the most specialised taxes operated by the most sophisticated taxpayers – which are in any event not within the scope of MTD.

Chapter 6

Question 6.1: Please provide details of how the proposed administrative changes will affect you, including details of any one-off and ongoing costs or savings.

Clients will need educating. In the short term (especially if HMRC fail to ease the implementation timetable) there are likely to be a significant number of appeals and significant loss of goodwill towards HMRC.

Questions 6.2: Do these administration proposals have a significant or disproportionate impact on groups with legally protected characteristics, as recognised in the Equalities Act 2010?

This is not an area where ACCA has any special evidence, and is an issue for the HMRC TIIN and impact assessment.

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