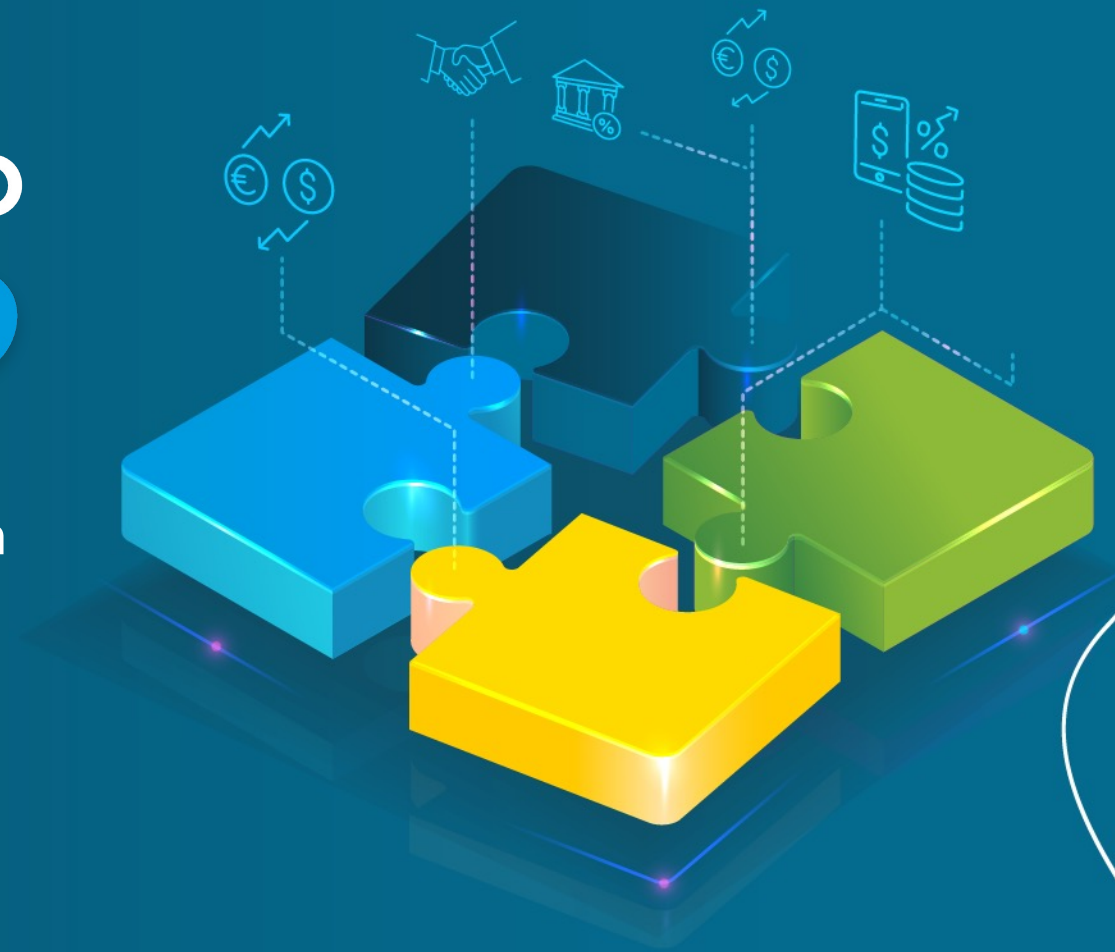


CUMPLIMIENTO TRIBUTARIO **COLABORATIVO**

La nueva forma de relacionarse entre los contribuyentes y la Administración Tributaria

HMRC – Introduction to UK Large Business Cooperative Compliance Model

Leanne Shaw





CUMPLIMIENTO TRIBUTARIO **COLABORATIVO**



La nueva forma de relacionarse entre
los contribuyentes y la Administración
Tributaria

Large businesses are complex, multinational entities with unique business models and group structures. This requires HMRC to take an approach that understands and is tailored to their complexities.

**2,000 Large
Business Groups**

**Made up of
>95,000 entities**

**Employ 8 million
people directly**

**HMRC receipts of
around £310 billion**

**£3.6 billion Tax
Gap in 2020/21.**

Large Business (LB) is HMRC's smallest customer group in number, but extremely complex, providing **40%** of HMRC's tax receipts.

LB customers generally have over **£200m in turnover**, or **£2bn in assets**; but other factors such as **complexity**, **risk** and **global mobility** can also warrant them being dealt with in LB.

Key traits:

- They are **international** companies with global interests, markets and entities. They will interact with and operate across multiple fiscs.
- Substantial **supply chains** underpin their activity, particularly in certain sectors e.g. automotive, retail and oil & gas.
- Most manage their tax affairs in-house, but will also retain specialist **agents** for events e.g. mergers & acquisitions and entering new markets.
- Responsive to the **media**, and public opinion, when making decisions.
- Complex **tax affairs** that cross borders.
- Utilise **new software and technology** to monitor their tax liabilities, and ease their administrative burden.



Our strategy for Large Business is underpinned by the Cooperative Compliance model

The complexity and money involved make this the most cost-effective way of getting the **right tax agreed early**.

Many large businesses are clear they want to play by the rules. They recognise the costs of drawn-out tax disputes – not just financial, but also reputational – and a distraction from their prime focus of running a commercial business.

This is why our approach to large business tax compliance is **risk-based, resource intensive, and relationship managed**. Our CCM approach has been shown to be:

- Internationally recognised by bodies such as OECD as in line with **international best practice** and a leading model
- Welcomed by business- one of the highest satisfaction scores across all customer groups (consistently high satisfaction rating year-on-year, consistently above **80%**)
- Delivering **significant yield** (£7.1bn in 2021-22)
- Encouraging **behavioural change**



How HMRC works with Large Businesses

- We manage LBs using dedicated **Customer Compliance Managers (CCMs)** and tax teams, who understand their affairs, engage directly with the business and carry out regular Business Risk Reviews (BRRs). As at March 2022 there were 168 LB CCMs.
- This gives us an early idea of potential arrangements, disputes or issues which could be open to **legal interpretation** as well as providing information/assurance on governance, systems and appetite for risk.
- We look to secure the best data and records to identify non-compliance promptly and seek national and international agreements on data-sharing to make the economic activity and tax affairs of LBs more **transparent**.
- Our preferred way of working is to address issues upstream wherever possible. However we use litigation where appropriate – and can publicise the outcome as a deterrent.



Large Business and Cooperative Compliance



**Secured more than £66bn additional tax
revenue from largest businesses since 2016**

83% of large businesses rate their overall
experience as **Good or Very Good** (in
2021)



**Tax Gap for large business reduced
from £7.6bn in 2005-06 to £3.6bn in
2020-21**

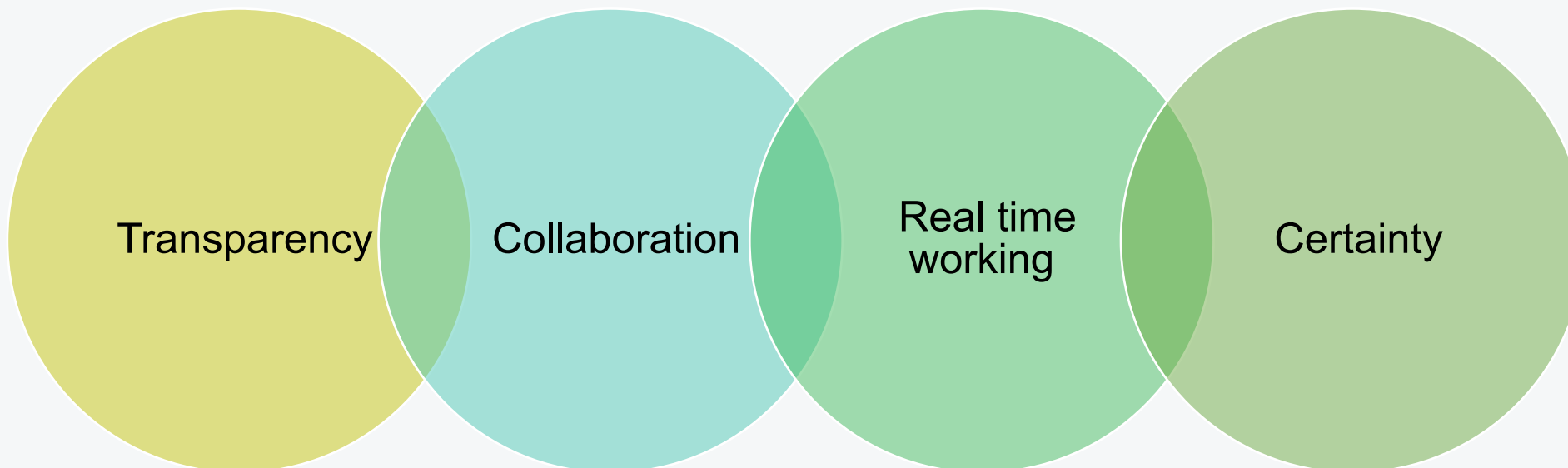
Only
y

AGREE that tax avoidance is
acceptable (in 2021 down from
45% in 2013)

16%



Business Risk Review

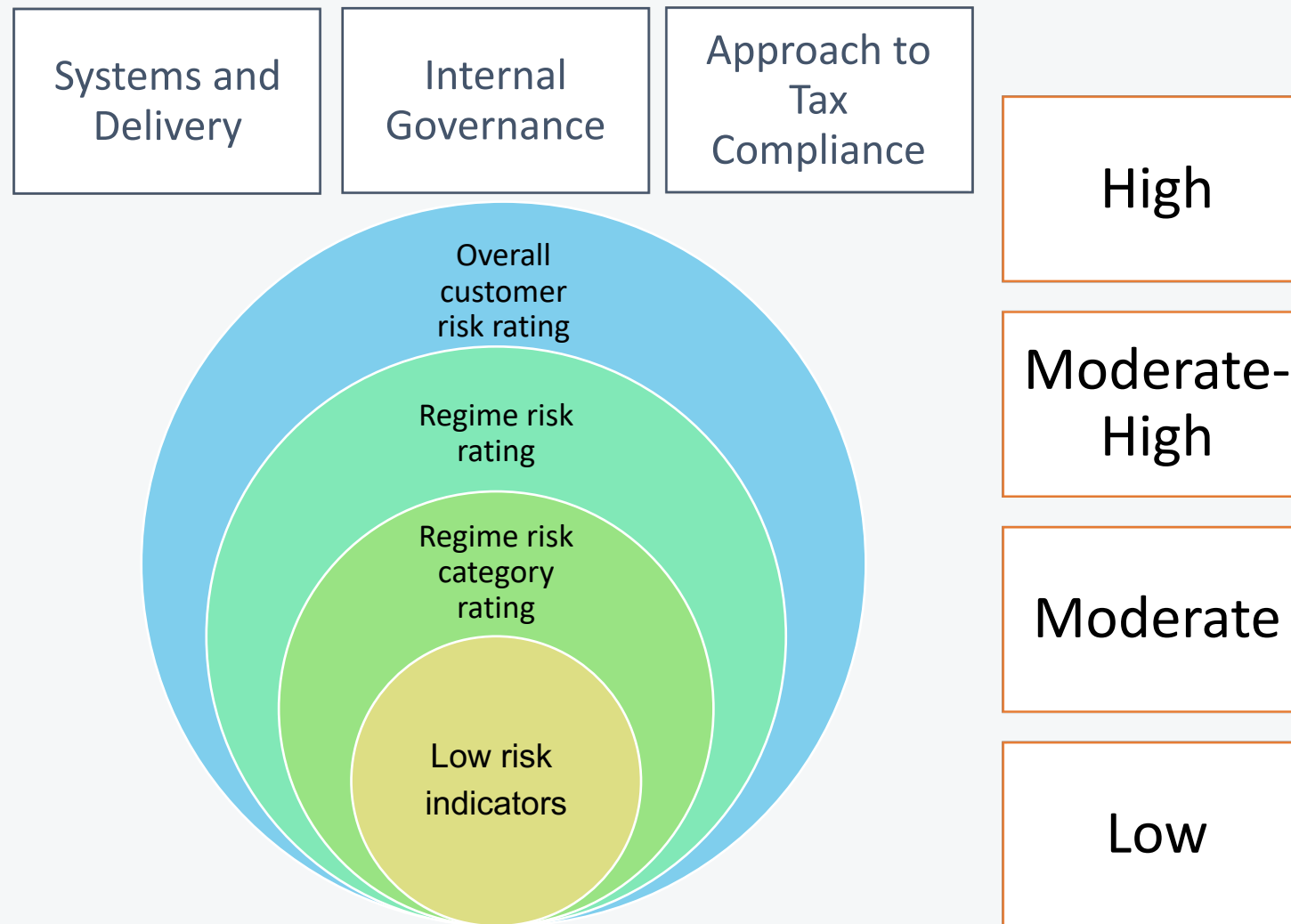




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¡GRACIAS!

