

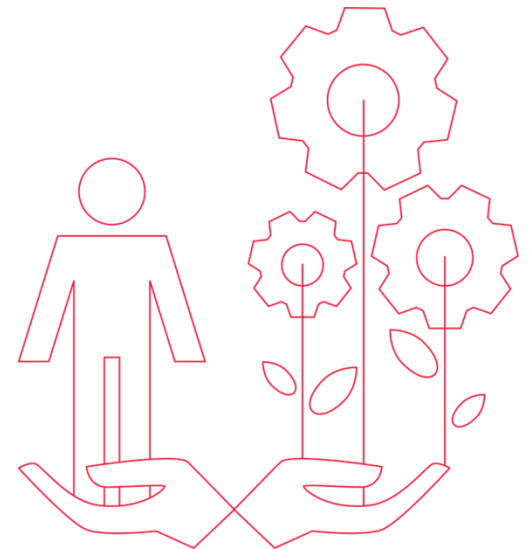
Abuse of Law

ITPG, Vienna 2017

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Weapons against tax avoidance

UK



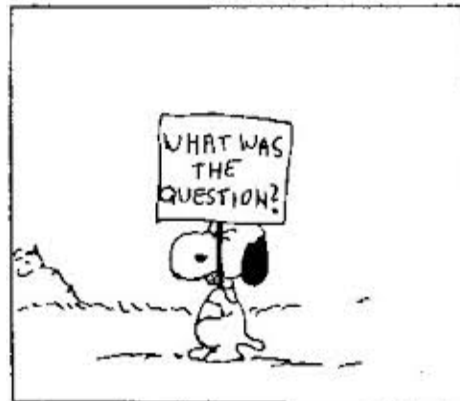
- DOTAS
- TAARs
- GAAR
- APN/PPN
- Follower notices
- POTAS
- PCRT



General Anti-Abuse Rule or GAAR UK



Abusive tax arrangements are ‘arrangements the entering into or carrying out of which cannot reasonably be regarded as a reasonable course of action in relation to the relevant tax provisions, having regard to all the circumstances...’





Use of GAAR UK



- Effective 17 July 2013
- First Advisory Panel opinion published 3 August 2017
- Employee rewards using gold bullion
- Panel concluded that the arrangements were not a reasonable course of action





Weapons against tax avoidance **UK**



- DOTAS **tell us if you have a good idea**
- TAARs **targeted anti avoidance rules**
- GAAR **for everything else**
- APN/PPN **pay up while we debate!!**
- Follower notices **you look like another case, pay up**
- POTAS **do not promote tax avoidance**
- PCRT **new standard on tax planning**



Anti-avoidance

You will pay!





Local Matters, National Strength.