

Disguised remuneration: Loan charge review

The government [has announced](#) a review of the loan charge. The loan charge remains in force during the review.

Find out what this means for you if you have used a disguised remuneration scheme and are affected by the loan charge.

Contents

- If you have already settled your disguised remuneration loan scheme use and paid the amount you owe in full
- If you have settled your disguised remuneration loan scheme use but are paying what you owe in instalments
- If you are waiting to finalise your settlement with HMRC and provided all the required information by 5 April 2019
- If you have not settled your disguised remuneration loan scheme use and will be subject to the loan charge
- Accelerated Payment Notices, compliance activity and litigation
- Next steps

If you have already settled your disguised remuneration loan scheme use and paid the amount you owe in full

You are not directly affected by the announcement of the review and there is no change to your tax position at this time.

HMRC will update this guidance setting out details of what the next steps are for you if your potential liability to the loan charge changes as a result of the government response to the review.

If you have settled your disguised remuneration loan scheme use but are paying what you owe in instalments

There is no change to your tax position at this time. You should continue to pay the amounts you have agreed to pay while the review is ongoing.

HMRC will update this guidance setting out details of what the next steps are for you if your potential liability to the loan charge changes as a result of the government response to the review.

If you provided all the required information by 5 April 2019 and are waiting to finalise your settlement with HMRC

You can continue to finalise your settlement with HMRC if you wish to do so. Settling your open enquiries and appeals will allow you certainty in your tax affairs. We want to work with you to finalise your tax affairs and get out of avoidance for good.

HMRC recognise that you may want to wait for the government's response to the review before finalising your settlement.

You do not need to submit the additional information return by 30 September 2019 as HMRC already has the information it needs.

If you choose to settle, HMRC will continue its existing practice of not charging statutory late payment interest from 1 October 2018, or, if later, the month in which you provided the required information to HMRC.

HMRC will update this guidance setting out details of what the next steps are for you if your potential liability to the loan charge changes as a result of the government response to the review.

If you are not settling your disguised remuneration scheme use

You will still need to complete an additional information return by 30 September 2019. If you fail to do so HMRC reserves the right to charge penalties. You can find further information about the [additional information](#).

Accelerated Payment Notices, compliance activity and litigation

HMRC is committed to tackling the use of disguised remuneration schemes. The review of the loan charge does not affect routine HMRC compliance activity related to disguised remuneration schemes, including Accelerated Payment Notices and ongoing litigation.

Unless you are in the process of settling, statutory late payment interest will continue to accrue on any unpaid tax during this period. You can stop this accruing by making a payment on account.

Next steps

HMRC will update this guidance once the government has responded to the review.