# Insurance Premium Tax: Administration and Unfair Outcomes

# Consultation

5th November 2020
Closing date for comments: 5th February 2021

Guidance for completing this document

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| **Subject of this consultation:** | The consultation brings forward specific proposals to improve the administration of Insurance Premium Tax (IPT) and prevent unfair outcomes. |
| **Scope of this consultation:** | This consultation is about possible measures intended to improve IPT, to make it easier for both the industry and HMRC to administer. It is also intended to seek views on specific measures which can be taken to prevent certain types of IPT avoidance and evasion. This consultation will not consider the rates of IPT or the exemptions to IPT. |
| **Who should read this:** | The consultation is seeking input from all members of the insurance industry. |
| **Duration:** | 5th November 2020 to 5th February 2021 |
| **Lead official:** | Russell Langford-Smith - HMRC |
| **How to respond or enquire about this consultation:** | Responses to this consultation can be sent to:<br>iptadminandunfairoutcomes@hmrc.gov.uk<br>Or:<br>Russell Langford-Smith<br>IPT & VAT Insurance Policy<br>Deductions and Financial Services<br>100 Parliament Street, London, SW1A 2BQ<br><br>Enquiries regarding this consultation should be sent to the same. |
| **Additional ways to be involved:** | As this is a largely technical issue with specialist interests, this will be primarily a written exercise. |
| **After the consultation:** | Following this consultation, the government will publish a response and, should the responses indicate that it is appropriate, legislation will be laid as necessary. |
| **Getting to this stage:** | This consultation follows the call for evidence on IPT held in 2019. |
| **Previous engagement:** | The responses to the call for evidence have informed both the scope and content of this consultation. The summary of these responses has been published here: https://www.gov.uk/government/consultations/call-for-evidence-the-operation-of-insurance-premium-tax |

# Contents

# 1. Introduction

During the Insurance Premium Tax (IPT) call for evidence in 2019, the government asked for industry comments on a range of areas in which the administration and collection of IPT could be modernised, whilst also exploring options for addressing instances of unfair outcomes in relation to IPT.

The government is grateful for all the responses received to that call for evidence and has used the industry feedback to inform this consultation.

This consultation suggests a range of specific proposals in relation to the areas covered by the call for evidence and requests comment on how and whether these proposals should be enacted.

As with the call for evidence, this consultation will not cover the rates of IPT or the IPT exemptions.

The government would be grateful for written responses to this consultation and will organise a meeting with relevant trade bodies and industry representatives to discuss responses, concerns and questions in further detail.

# 2. Subject Chapters

## Chapter 1: Unregistered Insurers

A risk to the UK IPT system is insurers, primarily based overseas, who write policies for UK risks without registering for and paying UK IPT. This results in a loss to the Exchequer of unpaid IPT and allows non-compliant unregistered insurers to undercut compliant registered insurers.

The government would like to level the playing field and prevent the loss of IPT due to unregistered insurers.

### *Option 1 – A code of conduct*

- The government proposes introducing a formal process by which brokers can notify HMRC of insurers who are not registered. HMRC will then register the insurer for IPT.
- This would take the form of a voluntary Code of Conduct to be entered into by brokers and HMRC. Both parties would commit to following a particular process to help address the issue of unregistered insurers.
- HMRC is continuing to explore the creation of a system with which brokers can verify which insurers are registered to pay IPT, in order to assist brokers in identifying which insurers are unregistered.

The call for evidence responses

The responses to the IPT call for evidence made it clear that although the industry is aware that not all insurers register for IPT, this is not considered to be a significant threat to the UK market. As such, the government is keen to avoid actions which would impose a disproportionate administrative burden on businesses, or impact on legitimate commercial practices.

The government is also aware that there are situations where there is no IPT registered insurer willing to underwrite a relevant risk and brokers are unable to meet their customer's requirements without engaging with insurers not registered for IPT, usually based overseas. This is a concern for the UK broker industry. The government does not want to act punitively where brokers are put in such a situation, as this has the potential to damage the UK brokerage market. The government would like to work with brokers to ensure that this circumstance does not result in the loss of UK tax or lead to tax evasion.

## The Code of Conduct

The government therefore proposes the introduction of a formal process by which brokers can notify HMRC of insurers who are not registered. HMRC will then register the insurer for IPT.

The proposal is a process that would take the form of a voluntary Code of Conduct to be entered into by brokers and HMRC.

Brokers would undertake to pass to HMRC details of any unregistered insurer writing business which is liable to IPT. HMRC would undertake to register that insurer, compulsorily if necessary, to ensure that brokers are not forced to deal with unregistered insurers. The exact details of such a Code of Conduct will be arrived at through discussion with the UK brokerage industry.

This would make it clear to insurers and the insured that brokers are working with HMRC to encourage compliance with IPT.

Where an unregistered insurer has been registered for IPT and refuses to subsequently render returns, the government is considering options for notifying relevant regulatory authorities, UK or overseas, that the insurer is not fulfilling their obligations in relation to UK IPT.

In order to assist brokers in identifying which insurers are unregistered, HMRC is continuing to explore the creation of a system with which brokers can verify which insurers are registered to pay IPT. The Prudential Regulatory Authority publishes a list of insurers who are regulated to write business in the UK, however this list serves a separate function and will not provide sufficient information for this purpose.

It is expected that a broker would use such a system, or contact the insurer to verify their registration status, and encourage them to register where they are not already. If the insurer refused to register the broker would then notify HMRC. This proposed approach reflects the responses received from the call for evidence, which highlighted the industry preference for keeping the tax simple and the liability with insurers in all circumstances.

## Further benefits and considerations.

In the past some brokers who were aware that an insurer was unregistered have collected the IPT due from the insured and paid it over to HMRC. This is problematic because IPT is a tax on insurers, not brokers and HMRC has no clear process for receiving payments of IPT in these circumstances.

Introducing a formal process by which brokers notify HMRC of unregistered insurers for registration would have the advantage that where HMRC receive IPT payments collected by brokers, in unusual circumstances such as these, the payment could then be assigned to the insurer's liability.

The government is also considering moving all insurers to an annual return basis, with quarterly payments on account above a certain threshold. This has the advantage of lowering the administrative burden of IPT on industry. Further discussion of this option is set out in the 'Administrative changes' chapter below.

This proposal has a number of advantages: it facilitates HMRC's compliance efforts and assists brokers by minimising the risks associated with dealing with insurers who are evading UK IPT by making it easier for brokers to notify HMRC of unregistered insurers.

Q.1. Would insurance brokers be willing to enter into a Code of Conduct, as described above, allowing HMRC to identify unregistered insurers?

Q.2. Would HMRC publishing a list of those brokers or trade bodies who have signed up to this code of practice deter anybody from signing up to such a Code of Conduct?

Q.3. Would insurance brokers find a public register, owned and maintained by HMRC, beneficial in order to verify the registered status of an insurer?

Q.4. Would the introduction of annual returns be welcomed by industry and in particular would it remove some of the barriers to unregistered insurers, particularly those overseas, registering for IPT?

### *Option 2 – Joint and several liability*

Although there is currently limited evidence on the scale of this issue, there is no doubt that some element of tax evasion is taking place through overseas insurers failing to register for IPT.

If HMRC receive further evidence in future that this issue is more significant than is currently indicated, then the government could introduce legislation to make brokers jointly and severally liable for the IPT on insurance policies where they act as an intermediary. This would give HMRC the power to assess brokers for any unpaid IPT and follow existing compliance processes in order to collect it.

As HMRC has a duty to prevent tax evasion, this option cannot be entirely dismissed; however, the government will not seek to implement this option unless HMRC receives evidence of significant evasion in this area, at which point HMRC would engage with industry to discuss next steps, as HMRC recognises this would represent a significant change for the brokerage industry.

This would have the advantage of ensuring that IPT is charged on all insurance policies written through brokers. This would also make it possible for insurance brokers to pay over IPT to HMRC where an insurer refuses to pay IPT due in the UK.

This would have the disadvantage of shifting some of the administrative burden of IPT compliance onto insurance brokers. Brokers would need to be sure that each insurer they dealt with was compliant, or risk having to pay the tax over to HMRC themselves. This would also potentially lead to brokers needing to register for IPT in order to pay the tax; this would increase the number of customers registered for IPT making compliance more difficult for HMRC. The government is also aware that this might put UK brokers at a disadvantage in comparison to their international competition.

Q.5. The government is aware that there are disadvantages to the introduction of joint and several liability in this way. Are there any additional factors that HMRC should consider in relation to this option?

### *Option 3 – Take no action*

HMRC has a responsibility to prevent the evasion of tax, to ensure that the right tax is paid at the right time. However, the measures taken to prevent tax evasion should also be proportionate to the amount of tax at risk in each area.

Given the potentially low level of evasion in this area, it may be the case that the pro-active measures outlined above to target this evasion are not justified by the tax at risk and would instead impose an undue administrative burden on both the insurance industry and HMRC.

Although HMRC is aware that some amount of IPT evasion takes place as a result of companies failing to register for IPT, in the responses to the IPT call for evidence the industry indicated that it does not believe that unregistered insurers are a significant threat to the competitiveness of the UK insurance market.

Q. 6. In your opinion, would any of the measures proposed above impose a disproportionate burden on the insurance industry, when compared with the IPT risk in this area?

### *Dismissed options*

When considering methods by which this evasion could be prevented the government has considered and dismissed a number of other options. These included:

- Making the insured immediately liable to register and pay IPT due where the insurer belongs outside the EU.
    - This was dismissed on the grounds that as IPT is a tax on insurers it would be a very significant change to move liability immediately onto the insured, potentially including the general public, in certain circumstances. This would also require a fundamental increase in HMRC's compliance work given the much greater number of people potentially required to be registered to pay the tax.

- Alter HMRC's power of assessment to allow the insured to be assessed for unpaid tax caused by non-compliance of an insurer, on concluded contracts of insurance.
    - This option was dismissed on the grounds that it is not reasonable to expect every individual and business to check that their insurer is registered for IPT before buying a policy. Furthermore, this would be very challenging for HMRC to enforce. In certain circumstances HMRC already has the power to issue a notice of liability to an insured party of an unregistered insurer, making them jointly and severally liable to pay any subsequent assessments of tax due.

- Allow brokers to collect and pay IPT on behalf of overseas insurers in all circumstances.
    - This option was dismissed as it may discourage overseas insurers from registering for IPT and instead place the burden of compliance on the UK brokerage industry. If an insurer knows that a UK broker is able to pay the tax on their behalf, there is no incentive for them to register themselves. This would also complicate the liability of IPT by making it less clear who is responsible for paying the tax; many respondents to the call for evidence praised the straightforward nature of the liability of UK IPT.

Q.7. Is there an option to encourage overseas insurers to register that the government has not considered?

## Chapter 2: Avoidance Structures

The government is aware that there are certain corporate structures used within the UK insurance industry which may be used to lower an insurer's exposure to IPT.

These are structures in which an insurer creates an 'in-house broker' within their corporate group. This broker charges customers an administration fee under a separate contract and the insurer lowers the amount of the premium by the same or a similar amount. The administration fee is not subject to IPT, although the customer may see a similar final price for their insurance. By charging an administration fee under these types of arrangements the group, including the insurer and broker, are able to reduce their overall liability to IPT.

This practice is sometimes known as 'value-shifting' where it happens elsewhere in the tax system because value has been 'shifted' from one area, to another with a lower tax liability.

Although these arrangements obey the letter of the law, they avoid the spirit of the law by allowing the insurer to artificially reduce its liability to IPT. This creates an unfair advantage for insurers who adopt this type of corporate structure.

The government is considering action to prevent this avoidance.

The responses to the call for evidence were very clear that the insurance industry is opposed to the extension of IPT to all administrative fees. The government is also aware that within the commercial insurance market, the charging of administrative fees rather than commission is a long-established practice reflecting the different service provided. There are also genuine commercial and regulatory reasons for charging administration fees rather than commission.

Consequently, the government intends to act in a targeted way in order to prevent this kind of 'value-shifting' avoidance. There are two main options available:

### *Option 1 – Connected Parties*

One method of preventing this avoidance would be to make administration fees liable to IPT where they are charged by brokers who are connected to an insurer.

The administration fee would be treated as part of the premium, as defined in section 72 of the Finance Act 1994.

As this is intended to be a targeted measure to prevent a specific kind of avoidance, the government is keen to ensure that, where possible, this does not catch legitimate commercial arrangements.

By limiting this measure to connected parties the government avoids making all administration fees liable to IPT and removes this incentive for insurers to adopt this corporate structure. This will not prevent insurers from creating in-house brokers where there are other commercial reasons for doing so, but it will remove the incentive to implement certain arrangements designed specifically to reduce IPT liability.

Q.8. To what extent do you think that this option will impact on competitiveness within the UK insurance industry?

Q.9. What are the legitimate commercial reasons for adopting an 'in-house' broker structure?

Q.10. Where administration fees are charged by a party connected to the insurer underwriting the policy, would making those fees liable to IPT prevent the IPT avoidance described above?

Q.11. Would making these administration fees liable to IPT penalise any legitimate commercial arrangements?

Q.12. Would you be in favour of this option?

### *Option 2 – Widening the scope of IPT*

Another option for preventing this 'value-shifting' avoidance would be to extend IPT to administration fees charged on all non-commercial insurance transactions. This is often known in the industry as 'personal lines' insurance.

The IPT call for evidence made it clear that there are genuine commercial reasons for charging administration fees alongside insurance and although this option would extend IPT to those administration fees, it would not otherwise discourage their use, as they would become no more or less liable to IPT than commission.

This would be a targeted option that would not add IPT to administration fees in the commercial insurance sector. During the call for evidence industry explained that the structure of this market is different and that the use of administration fees is a commercial necessity. This is due to the fee charged by a broker for their service often not being directly related to the premium amount, due to the complex nature of some of the insurance policies.

This option may not be straightforward to implement, requiring brokers to pass commercial information regarding fees charged under a separate contract between themselves and their customers to a third party, the insurer. However, HMRC are content that this would not breach UK competition laws. This option would have the advantage of treating all administrative fees for personal lines insurance equally.

Q.13. To what extent do you think that this option will impact on competitiveness within the UK insurance industry?

Q.14. Would you be in favour of extending IPT to all administration fees charged on personal lines insurance? In particular, would you favour this type of inclusive option over option 1?

Q.15. Do you think this would prevent the IPT avoidance as set out above?

*Dismissed option: Charging IPT on all fees, including commercial insurance*

During the call for evidence it was suggested that the government could expand the scope of IPT to include all fees charged alongside contracts of insurance, even where those fees are charged under separate contract.

- This option was dismissed because responses received to the call for evidence made it clear that there are genuine commercial and regulatory reasons for charging administration fees on the sale of commercial insurance due to the complex nature of some commercial insurance transactions and the additional services which a broker may provide as part of placing the insurance with an insurer. Consequently, the government believes that bringing all administration fees within IPT would impose a disproportionate burden on the industry.

## Chapter 3: Administration of IPT

- The government intends to legislate to remove the IPT registration and return forms from secondary legislation, to allow them to be updated more easily in response to the evolving needs of the UK tax system.
- The government requests comment on the administrative burden which would be imposed on insurers if HMRC required insurers to report, specifically: the total amount of gross written premium for non-life business written in the UK, as reported in the regulatory return (either quarterly or annually depending on the basis of the IPT return).

Removal of IPT forms from legislation.

During the call for evidence the government suggested a number of changes which could be made to improve the existing IPT registration and return forms.

Currently the IPT registration and returns forms are specified within the schedules to the Insurance Premium Tax Regulations 1994. This makes updating these forms unnecessarily onerous for HMRC as each change requires legislation. Consequently, the government intends to legislate to remove these forms from secondary legislation, to allow them to be updated more easily in response to the evolving needs of the UK tax system.

The government acknowledges the responses received to the call for evidence were clear that any significant changes to these forms may result in additional administrative burdens on the industry. HMRC consequently commits that any such alterations would be consulted on, whether formally or informally, in advance of changes being made wherever possible.

In light of this commitment, this consultation intends to follow up in more detail a question raised during the IPT call for evidence: the possibility of altering the IPT return to require firms to report different figures, to assist with HMRC compliance.

## Alteration to the IPT return

In the call for evidence the government asked for comment on the possibility of firms being required to report figures relating to their gross written premiums and suggested a range of possibilities for what these figures could include. The government also asked the industry to comment on the additional administrative burden this would place on them.

Following comments received from the industry, it is clear that the open nature of the government's original request in this area may have been an area of concern.

The government would therefore like to request comments on the administrative burden which would be imposed on insurers if HMRC required insurers to report, specifically: ***the total amount of gross written premium for non-life business written in the UK, as reported in the regulatory return (either quarterly or annually depending on the basis of the IPT return).*** The intention here is to request data which provides context to the IPT due figure, but which relates closely to the data already required by an insurer's regulatory return, to minimise any additional administrative burden.

This would replace the existing requirement to report the total amount of taxable premium.

Although respondents to the call for evidence made it clear that any change to the reporting of IPT would place an administrative burden on the industry, this information would greatly assist HMRC in the targeting of compliance efforts and therefore this consultation seeks further information on the specific administrative burden this would impose on firms.

## Moving IPT to an annual return basis

The government recognises that a change to reporting requirements will lead to an increase in the administrative burden of IPT and, as the purpose of this consultation is to improve the administration of IPT for both HMRC and the industry, the government is further proposing that IPT could be moved to an annual return basis, rather than quarterly returns basis, with payments on account quarterly for insurers who pay more than a certain amount of IPT per year.

The threshold above which quarterly payments on account will be required is yet to be determined but the intention behind this change is that the majority of insurers registered for UK IPT will only need to file returns and make payments annually.

This would mean that although firms would need to alter their systems to report the gross written premiums rather than the net taxable premium, this would only need to be reported once a year. The government would be grateful for the industry's opinion on this change.

This would also mean that where an overseas firm writes UK business very infrequently, they would not need to commit to filing quarterly IPT returns when they register, only annual returns.

The government intends that this change should make the administration of IPT easier for overseas insurers (as well as UK insurers) and therefore remove a barrier to their registration.

Q.16. To what extent would reporting gross written premiums for UK general insurance increase the administrative burden on firms?

Q.17. If this requirement was to be introduced, what actions could HMRC take to ease the administrative burden of making this change?

Q.18. Would the industry welcome a move to an annual returns period for IPT, with quarterly payments on account for insurers who pay more than a certain amount of IPT each year?

Q.19. Would an annual returns period make IPT easier to administer for the industry?

Q.20. Would an annual returns period make it more likely that overseas insurers would register for UK IPT?

# 3. Assessment of Impacts

### Summary of Impacts

[this table is mandatory, and it should only be deleted if an alternative format is used. Consider the best place in the document to present this information – this will normally be after you have explained the policy options and before a summary of the consultation questions. Go here for help on each field.]

| **Exchequer impact (£m)** | 2019 -20 | 2020 -21 | 2021 -22 | 2022 -23 | 2023 - 2024 |
|---|---|---|---|---|---|
| | +/- | +/- | +/- | +/- | +/- |
| **Economic impact** | There are no economic impacts at present. Any impacts identified following this consultation will be fully examined and detailed. | | | | |
| **Impact on individuals, households and families** | There are no impacts on individuals at present. Any impacts identified following this consultation will be fully examined and detailed. | | | | |
| **Equalities impacts** | There are no equality impacts at present. Any impacts identified following this consultation will be fully examined and detailed. | | | | |
| **Impact on businesses and Civil Society Organisations** | There are no impacts on businesses or civil society organisations at present. Any impacts on businesses or civil society organisations identified following this consultation will be fully examined and detailed. | | | | |
| **Impact on HMRC or other public sector delivery organisations** | There are no impacts on HMRC or other public sector organisations at present. Any impacts identified following this consultation will be fully examined and detailed. | | | | |
| **Other impacts** | Other impacts have been considered and none have been identified. | | | | |

# 4. Summary of Consultation Questions

Q.1. Would insurance brokers be willing to enter into a Code of Conduct, as described above, allowing HMRC to identify unregistered insurers?

Q.2. Would HMRC publishing a list of those brokers or trade bodies who have signed up to this code of practice deter anybody signing up to such a code of practice?

Q.3. Would insurance brokers find a public register, owned and maintained by HMRC, beneficial in order to verify the registered status of an insurer?

Q.4. Would the introduction of annual returns be welcomed by industry and in particular remove some of the barriers to unregistered insurers, particularly those overseas, registering for IPT?

Q.5. The government is are aware that there are disadvantages to the introduction of joint and several liability in this way. Are there any additional factors that HMRC should consider in relation to this option?

Q. 6. In your opinion, would any of the measures proposed above impose a disproportionate burden on the insurance industry, when compared with the IPT risk in this area?

Q.7. Is there an option to encourage overseas insurers to register that the government has not considered?

Q.8. To what extent do you think that this option will impact on competitiveness within the UK insurance industry?

Q.9. What are the legitimate commercial reasons for adopting an 'in-house' broker structure?

Q.10. Where administration fees are charged by a party connected to the insurer underwriting the policy, would making those fees liable to IPT prevent the IPT avoidance described above?

Q.11. Would making these administration fees liable to IPT penalise any legitimate commercial arrangements?

Q.12. Would you be in favour of this option?

Q.13. To what extent do you think that this option will impact on competitiveness within the UK insurance industry?

Q.14. Would you be in favour of extending IPT to all administration fees charged on personal lines insurance? In particular, would you favour this type of inclusive option over option 1?

Q.15. Do you think this would prevent the IPT avoidance as set out above?

Q. 16. To what extent would reporting gross written premiums for UK general insurance increase the administrative burden on firms?

Q.17. If this requirement was to be introduced, what actions could HMRC take to ease the administrative burden of making this change?

Q.18. Would the industry welcome a move to an annual returns period for IPT, with quarterly payments on account for insurers who pay more than a certain amount of IPT each year?

Q.19. Would an annual returns period make IPT easier to administer for the industry?

Q.20. Would an annual returns period make it more likely that overseas insurers would register for UK IPT?

# 5. The Consultation Process

This consultation is being conducted in line with the Tax Consultation Framework. There are 5 stages to tax policy development:

Stage 1 Setting out objectives and identifying options.

Stage 2 Determining the best option and developing a framework for implementation including detailed policy design.

Stage 3 Drafting legislation to effect the proposed change.

Stage 4 Implementing and monitoring the change.

Stage 5 Reviewing and evaluating the change.

This consultation is taking place during stage 2 of the process. The purpose of the consultation is to seek views on the detailed policy design and a framework for implementation of a specific proposal, rather than to seek views on alternative proposals.

### How to respond

The deadline for responses is the 5th February 2021.

A summary of the questions in this consultation is included at chapter 4.

Responses should be sent by 5th February 2021, by e-mail to

iptadminandunfairoutcomes@hmrc.gov.uk

or by post to:

Russell Langford-Smith
IPT & VAT Insurance Policy
Deductions and Financial Services
100 Parliament Street, London, SW1A 2BQ

Telephone enquiries: Russell Langford-Smith 03000 566499 (from a text phone prefix this number with 18001)

**Please do not send consultation responses to the Consultation Coordinator.**

Paper copies of this document or copies in Welsh and alternative formats (large print, audio and Braille) may be obtained free of charge from the above address. This document can also be accessed from HMRC's GOV.UK pages. All responses will be acknowledged, but it will not be possible to give substantive replies to individual representations.

When responding please say if you are a business, individual or representative body. In the case of representative bodies please provide information on the number and nature of people you represent.

## Confidentiality

Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with the access to information regimes. These are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018, General Data Protection Regulation (GDPR) and the Environmental Information Regulations 2004.

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals with, amongst other things, obligations of confidence. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on HM Revenue and Customs.

## Consultation Privacy Notice

This notice sets out how we will use your personal data, and your rights. It is made under Articles 13 and/or 14 of the General Data Protection Regulation.

## Your Data

### The data

We will process the following personal data:

Name
Email address
Postal address
Phone number
Job title

### Purpose

The purpose(s) for which we are processing your personal data is: The Consultation on Insurance Premium Tax

### Legal basis of processing

The legal basis for processing your personal data is that the processing is necessary for the exercise of a function of a government department.

### Recipients

Your personal data will be shared by us with HM Treasury.

### Retention

Your personal data will be kept by us for six years and will then be deleted.

## Your Rights

- You have the right to request information about how your personal data are processed, and to request a copy of that personal data.
- You have the right to request that any inaccuracies in your personal data are rectified without delay.
- You have the right to request that any incomplete personal data are completed, including by means of a supplementary statement.
- You have the right to request that your personal data are erased if there is no longer a justification for them to be processed.
- You have the right in certain circumstances (for example, where accuracy is contested) to request that the processing of your personal data is restricted.

## Complaints

If you consider that your personal data has been misused or mishandled, you may make a complaint to the Information Commissioner, who is an independent regulator. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
0303 123 1113
casework@ico.org.uk

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.

## Contact details

The data controller for your personal data is HM Revenue and Customs. The contact details for the data controller are:

HMRC
100 Parliament Street
Westminster
London SW1A 2BQ

The contact details for HMRC's Data Protection Officer are:

The Data Protection Officer
HM Revenue and Customs
7th Floor, 10 South Colonnade

Canary Wharf, London E14 4PU
advice.dpa@hmrc.gsi.gov.uk

## Consultation Principles

This call for evidence is being run in accordance with the government's Consultation Principles.

The Consultation Principles are available on the Cabinet Office website: http://www.cabinetoffice.gov.uk/resource-library/consultation-principles-guidance

If you have any comments or complaints about the consultation process please contact:

John Pay, Consultation Coordinator, Budget Team, HM Revenue and Customs, 100 Parliament Street, London, SW1A 2BQ.

**Please do not send responses to the consultation to this address.**