



## ICAEW TAX REPRESENTATION

### HMRC'S CUSTOMER SERVICE STANDARDS

**Results of a member survey by the ICAEW Tax Faculty into HMRC's service standards conducted between June and July 2011**

<b>Contents</b>	<b>Paragraph</b>
Introduction	1 - 3
Who we are	4 - 6
Major points	7 - 16
Specific points	17 - 77
Background to survey series	Appendix 1
HMRC service issues – what are your priorities?	Appendix 2
Ten Tenets for a Better Tax System	Appendix 3

## **INTRODUCTION**

1. This TAXREP sets out the results of a short survey by the ICAEW Tax Faculty into HMRC's service standards.
2. This survey is the latest in a series which helps us to measure changes in HMRC's service standards. Our first survey was undertaken to provide evidence for representations made to the Treasury Committee in 2007. This was followed by a similar survey in 2009 and another in 2010. This year's survey was live between June and July 2011.
3. Our Ten Tenets for a Better Tax System by which we benchmark proposals to change the tax system are summarised at Appendix 3.

## **WHO WE ARE**

4. ICAEW is a world-leading professional accountancy body. We operate under a Royal Charter which obliges us to work in the public interest. ICAEW's regulation of its members, in particular its responsibilities in respect of auditors, is overseen by the UK Financial Reporting Council. We provide leadership and practical support to over 136,000 member chartered accountants in more than 160 countries, working with governments, regulators and industry in order to ensure that the highest standards are maintained.
5. ICAEW members operate across a wide range of areas in business, practice and the public sector. They provide financial expertise and guidance based on the highest professional, technical and ethical standards. They are trained to provide clarity and apply rigour, and so help create long-term sustainable economic value.
6. The Tax Faculty is the voice of tax within ICAEW and is a leading authority on taxation. Internationally recognised as a source of expertise, the faculty is responsible for submissions to tax authorities on behalf of ICAEW as a whole. It also provides a range of tax services, including TAXline, a monthly journal sent to more than 8,000 members, a weekly newswire and a referral scheme.

## **MAJOR POINTS**

7. This is the fourth in a series of surveys through which we collect our members' opinions of HMRC's customer service standards. Our first survey was in 2007, and apart from a one year gap in 2008, the survey has been undertaken annually.
8. The survey is open to all rather than using a statistically selected sample and therefore respondents are self selecting. However, we have asked the same questions over four years so can identify trends. See appendix 1 for the background to the survey
9. Tax agents are acknowledged by HMRC as an essential part of the UK tax system. Our members, through their expertise and the multiplier effect (each member in practice acts for many individual client taxpayers), provide a valuable resource to assist tax compliance and tax gathering for a large proportion of UK taxpayers at no direct cost to government. It follows that given this vital role, they need to be able to communicate with HMRC easily, efficiently and reliably.
10. We continue to monitor HMRC service standards, particularly as HMRC continues to seek to reduce its costs and improve its efficiency in line with the department's budget allocation. On the basis of the evidence from this survey and elsewhere, we remain very concerned about

whether HMRC can meet its aspiration to “provide an increasingly efficient and high quality service” while reducing staff numbers.

11. Members responding to the survey identified three particular areas upon which HMRC should concentrate resources to help improve overall service standards, namely:

- better trained staff;
- nominated staff having ownership of problems; and
- e-mail access to HMRC.

12. Difficulty communicating with HMRC stands out as one of the biggest problems for agents. It is difficult to get through on the telephone, HMRC staff answering the phones frequently do not have sufficient knowledge to be able to resolve queries, promised call backs do not always happen and letters sometimes remain unanswered.

13. We have asked members each year how they would prefer to be able to communicate with HMRC given a choice between telephone, post, email and online. In this year’s survey, e-mail is once again the most popular choice. This is not surprising given that in the past ten years it has become the standard business communication channel. In addition to speed and ease of use, it provides an audit trail and the ability for automatic acknowledgement that it has been received.

14. We welcome the progress HMRC has made so far with implementing communication by email, and in particular its new email service for VAT enquiries. If service standards are to be improved, email solutions need to be rolled out more widely across other taxes as soon as possible.

15. HMRC is spending considerable sums developing its online services for businesses, particularly smaller businesses. However, it does not always consider the needs of agents when these systems are designed.

16. We welcome the Joint Initiative between HMRC, the professional bodies and tax charities launched on 14 September 2011 aimed at improving service standards.

## SPECIFIC COMMENTS

### Time and costs spent dealing with HMRC service problems

17. As HMRC continues its drive to cut costs and become more efficient, we are concerned that cost savings achieved by HMRC are being passed on to taxpayers and their agents.

18. We asked our members, compared with 12 months ago, whether they felt the amount of time they typically spent dealing with HMRC errors had changed. They said it had:

	2011	2010	2009	2007
Increased significantly	49%	54%	35%	16%
Increased marginally	29%	24%	31%	29%
Remained broadly the same	18%	18%	25%	45%
Decreased marginally	2%	1%	5%	5%
Decreased significantly	1%	1%	1%	0%
Don't know/can't say	1%	2%	3%	4%

**Preferred means of communication**

19. As in each previous survey, our members have said that they would prefer to communicate with HMRC by email. It is interesting to note that an increasing proportion of our members would also like to communicate with HMRC using online methods, such as through secure mailboxes. Post is seen as a last resort.

20. Preferred means of communication: ranking (1 is first choice)

	2011	2010	2009
Telephone	3	2	2
Post	4	4	3
Email	1	1	1
Online	2	3	4

(Question not asked in 2007)

21. We welcome the progress HMRC has made so far with implementing communication by email. We were able to report on our newswire in September 2011 that HMRC had launched a new email service to handle VAT enquiries. HMRC now strongly recommends that written questions about VAT are submitted by email, as it expects to reply to questions more quickly this way. It suggests that only particularly long questions, or those where you need to attach something, should be sent by post.

22. This is a welcome improvement to service levels, and the survey results above confirm that to effect a general improvement in service standards email needs to be rolled out across other taxes as soon as possible.

**Dealing with HMRC by telephone**

23. One of the biggest problems when trying to contact HMRC by telephone continues to be the difficulty in getting through to speak to someone at HMRC.

**Agent Dedicated telephone lines**

24. Agent Dedicated telephone lines (ADLs) replaced Agent Priority lines (APLs) between our 2009 and 2010 surveys. APLs simply gave priority to calls from agents who called HMRC call centres using specific telephone numbers. These gave access only to the same call centres used by the general public.

25. ADLs are available only to agents and give access to more highly trained staff. The introduction of ADLs was a welcome development given the key role that tax agents play in making the tax system work and in providing a 'multiplier effect' for HMRC. These lines have been very well received by our members and compare very favourably with the telephone experience of having to call the general HMRC contact centres. Unfortunately, the results below suggest that the service has deteriorated since 2010.

26. Around 22% of calls are being answered within 30 seconds. A further 35% of calls are estimated to be answered within two minutes.

27. Time taken to get through to HMRC using these lines:

	2011	2010	2009	2007
--	------	------	------	------

Less than 30 seconds	22%	25%	25%	23%
30 seconds to 2 minutes	35%	42%	37%	50%
More than 2 minutes	16%	7%	11%	10%
Usually takes more than one attempt to connect	19%	13%	9%	9%
Don't know	9%	13%	18%	8%

28. We think that these lines are very useful and provide benefits both for agents and for HMRC, but as before, we recommend further specialisation for the HMRC staff working on these lines. We would also like the service extended to include PAYE matters.

**Quality of response.**

29. We are concerned not only with how long it takes to reach HMRC by telephone, but also with the quality of the response. This appears to remain poor.

30. We asked respondents to consider the last ten times they had called HMRC with a telephone enquiry, asking how many times the query was resolved to their satisfaction within the first call.

31. In 2011, 70% (2010, 71%; 2009, 63%; 2007, 55%) of respondents reported that in at least five of the last ten calls to HMRC, they needed to have further contact in order to resolve the enquiry.

32. Our surveys show that since 2007 there has been a steady and marked decline in the quality of HMRC's telephone service. The need to make follow up phone calls is very inefficient and wastes large amounts of time, both for the agent and for HMRC. Last year we recommended further research into the types of enquiry which cause most problems for call centres.

33. Comments made through our survey undertaken in August, see Appendix 2, and at local meetings of members, indicate that ownership of specific problems would make it quicker and easier to resolve them.

34. The new agent account manager service, introduced after a pilot in 2007, promises a streamlined process to resolve specific client related ongoing problems more quickly, the Agents' Issue Resolution Service. We have had encouraging reports from members who have used this service although, as it becomes more popular with agents, we wait to see how it copes with increasing demand.

35. We asked in relation to phone calls to HMRC to discuss more complex client related queries, would our members say the technical knowledge of HMRC staff who take these calls is sufficient to resolve the query:

	2011	2010	2009	2007
Always sufficient to resolve your enquiry efficiently	0%	0%	0%	1%
Usually sufficient to resolve your enquiry efficiently	14%	18%	23%	31%
Rarely sufficient to resolve your enquiry efficiently	56%	50%	41%	36%
Never sufficient to resolve your	8%	11%	9%	4%

enquiry efficiently				
Varies/depends on individual	19%	19%	23%	25%
Don't know/ Can't say	3%	2%	4%	3%

36. Unfortunately, there is a distinct trend downwards. Without further analysis, it is not possible to say what is causing this problem. However, we note that over this same period, HMRC has cut its staff numbers from 92,888 full-time equivalents (in 2005/06), to 69,300 (in 2009/10) - an overall reduction of a quarter. The largest reduction, 11,860 posts (14% of the workforce), occurred between April 2009 and April 2010.
37. HMRC is investing in staff training, but on the above evidence this is not yet having the desired effect. Unfamiliarity with particular taxpayer cases coupled with a lack of staff continuity, inevitable where call centres are involved, are also probably to blame.

**Request for a straightforward data change**

38. We also asked respondents to consider the last ten times they had telephoned HMRC with a request for a straightforward data change, for example amending a client's name or address, how many times the query was resolved to their satisfaction on the first call.
39. In 2011, 21% (2010, 21%; 2009, 30%; 2007, 27%) reported success on at least eight of the last ten occasions. More disturbing was the increase in number of respondents who had experienced a successful change on two or less occasions. In 2011, this rose to 31% (2010, 21%; 2009, 17%; 2007, 17%).
40. This is very disappointing given that these responses relate to simple data changes. We did not ask what specific changes caused the most problems, although anecdotally, we understand that many have been caused by incorrect PAYE codes and reconciliations following the HMRC new National Insurance and PAYE service reconciliations which began in 2010.
41. HMRC is increasing the automation of these services and we look forward to agents being able to use electronic methods to effect straightforward changes. However, there will always be occasions when changes need to be made by telephone and it is important to be able to rely on them being actioned correctly. Errors cause friction between our members and their clients and increase the administrative burden of the tax system.

**Dealing with HMRC by post**

42. We asked respondents how long it took before an enquiry submitted by post received a full answer, treating VAT and other taxes separately.

**Time to reply to queries not involving VAT**

43. In 2011, replies to queries, not involving VAT, took between one and three months in 46% of cases (2010, 53%; 2009, 59%; 2007, 50%). In 31% of cases, a full reply took longer than three months (2010, 34%; 2009, 21%; 2007, 20%).
44. We have had many complaints from our members about the delays they experience when dealing with HMRC by post. Philippa Stedman, a member of the Tax Faculty's technical team who ran her own tax practice until recently, was seconded to HMRC for several months during 2011. One of her projects was to help HMRC find better ways to deal with its post problem. This work is ongoing, but we hope to see some improvement in turnaround times in 2012.

**Time to reply to queries involving VAT**

- 45. As in our previous surveys, we found that only half of our respondents had an opinion on the speed of reply to queries involving VAT, but overall these were resolved marginally more quickly. Of those with an opinion, in 2011 48% (2010, 47%; 2009, 49%) of replies took between one and three months. In 20% of cases a full reply took longer than three months (2010, 18%; 2009, 15%).
- 46. One possible reason for a better service standard for VAT is that many queries will be specific to VAT and so may be handled by specialist VAT trained staff.

**Request for a straightforward data change**

- 47. We asked respondents to consider the last ten times they had written to HMRC with a request for a straightforward data change such as amending a client’s name or address, asking how many times the action was completed at the first request.
- 48. In 2011, 14% (2010, 22%; 2009, 24%; 2007, 36%) reported success on at least eight of the last ten occasions.
- 49. The service has continued to deteriorate and remains an area for considerable concern.
- 50. We also asked respondents to give their opinions of the technical knowledge of HMRC staff who deal with letters.
- 51. In 2011, 37% (2010, 36%; 2009, 27%; 2007, not asked) of respondents felt that the level of knowledge of HMRC staff who deal with letters was rarely or never sufficient to resolve the enquiry efficiently. Again, although this may reflect in part the increased complexity of the tax system, the survey results show a need for improved staff training.

**Notices of coding**

- 52. We asked what proportion of PAYE coding notices were incorrect.

	2011	2010	2009
Less than 10% of notices are incorrect	18%	18%	27%
More than 10% but less than 25% of notices are incorrect	26%	21%	31%
More than 25% but less than 50% of notices are incorrect	34%	40%	25%
More than 50% of notices are incorrect	21%	21%	17%

(Not asked in 2007)

- 53. The new National Insurance and PAYE Service (NPS) computer went live in June 2009. At the time of our survey in 2010, our members had just experienced four months of notices of coding which had been generated by the new system, many being based on incorrect data. This caused a spike in the number of wrong codes being sent out.
- 54. There has been some improvement this year and we will be interested to see what impact the new link, live from October 2011, between the self assessment system and NPS has on next year’s results. The effect of this link will be to allow data received on self assessment tax returns to be reflected in the following year’s notice of coding for PAYE taxpayers.

55. We asked our respondents what in their opinion was the proportion of cases which were wrong where HMRC already had the necessary information to issue a correct code.

	2011	2010	2009
Less than 25%	6%	8%	10%
More than 25% but less than 50%	11%	12%	11%
More than 50% but less than 75%	25%	20%	24%
More than 75%	58%	60%	55%

56. In the light of the new computer links between the SA and NPS computer systems, we hope to see improvements in this area next year. There remain significant problems in some areas, however, such as the mismatch between automatic adjustment of notices of coding for benefits in kind shown on Forms P11D and then entered on tax returns, while claims under s 336, ITEPA 2003 for expenses wholly, exclusively and necessarily incurred in the performance of duties of employment, are dealt with separately.

57. The restriction of the personal allowance for taxpayers earning over £100,000 is likely to create another area of practical difficulty for PAYE code adjustment.

### Repayment processing

58. Taxpayers can claim a tax repayment by completing a self assessment tax return either on line or on paper or by using paper form R40. Only taxpayers within the self assessment system can submit a tax return. As in previous years, we wanted to establish how quickly taxpayers received repayments using each of these methods.

59. We note that there is still no option to submit an R40 return online, something we have advocated for the last five or six years. If service standards are to be improved and HMRC's costs reduced, it is essential that an electronic R40 is developed. The suggestion has been discussed with HMRC through the Working Together forum where we have asked for it to be given priority. We understand that an intelligent form is currently being considered and welcome the opportunity to participate in this development.

60. When we asked this question in our survey, we also gave the options, varies/depends on time of year/don't know. We calculated the following results based only on those respondents who were able to estimate a response time.

61. Time to receive repayments following submission of hard copy tax return:

	2011	2010	2009	2007
Less than 14 days	1%	3%	6%	3%
14 days to 1 month	20%	16%	16%	21%
More than 1 month but less than 3 months	46%	44%	51%	57%
More than 3 months	33%	37%	27%	19%

62. Time to receive repayments following submission of online tax return:

	2011	2010	2009	2007
Less than 14 days	42%	39%	57%	64%
14 days to 1 month	38%	34%	32%	28%
More than 1 month but less than 3 months	14%	22%	10%	6%
More than 3 months	6%	5%	1%	2%

63. Time to receive repayments following submission of hard copy R40 return:

	2011	2010	2009	2007
Less than 14 days	2%	4%	2%	9%
14 days to 1 month	27%	28%	44%	46%
More than 1 month but less than 3 months	54%	56%	42%	40%
More than 3 months	17%	12%	12%	5%

64. As expected, online submissions elicited the fastest repayments since the process is largely automated.

65. Although it is not compulsory to file self assessment tax returns online, HMRC's online filing data shows a marked increase in the proportion of returns filed online as opposed to on paper in recent years. HMRC's statistics show the following trend.

Year of receipt and filed by 5 April of that year	Total returns received (online and paper)	Online returns received	Percentage of returns received filed online
2005/06	8,856,552	2,025,425	23%
2006/07	8,832,105	2,948,983	33%
2007/08	8,837,932	3,853,227	43%
2008/09	8,963,661	5,949,510	66%
2009/10	8,988,029	6,625,382	74%
2010/11	9,248,160	7,127,072	77%

Source: <http://www.hmrc.gov.uk/about/online-filing-figs.htm>

66. Clearly, in repayment cases, there is much to be said for filing a tax return online. This works unfairly for taxpayers who are not in the self assessment system who cannot file returns online, particularly as many of these people will have low incomes.

67. We understand that the fall in number of very fast repayments seen in the early years of online filing is attributable to manual checks which are used by HMRC to verify some repayments before they are issued.

## VAT applications

68. The speed with which HMRC processes new VAT registrations can have a significant impact on the smooth running of the business concerned. VAT registrations need to be processed as quickly as possible, but from time to time there are delays which become particularly problematic. Some applications for registration are merely routine and we would expect the vast majority of these to be processed very quickly. Others are more complex and need to be checked more thoroughly, either because of the nature of the business itself or because the business will be making large repayment claims.

69. We asked respondents how long new VAT registrations had taken for routine applications made in the past six months:

	2011	2010	2009
Up to 14 days	24%	19%	21%
15 days to 1 month	43%	41%	45%
More than 1 month but less than 3 months	26%	36%	29%
More than 3 months	7%	4%	5%

Note. This question was not included in 2007.

70. We asked respondents how long new VAT registrations had taken for non routine applications made in the past six months:

	2011	2010	2009
Up to 14 days	2%	4%	2%
15 days to 1 month	19%	28%	44%
More than 1 month but less than 3 months	53%	56%	42%
More than 3 months	27%	12%	12%

Note. This question was not included in 2007.

71. It appears that simple registrations are being processed more quickly while there is can be significant delays processing VAT registrations for some of the more complex businesses. This is supported by anecdotal evidence from our members. The new online registration process promises faster registration for routine applications. We have heard that a few days can be the norm for these to obtain their registration details.

72. Although online VAT registration applications are very efficient, we have said in response to the recent VAT transformation consultation VAT: consultation on the next steps for moving VAT online we think it should not become mandatory to apply online. We have also asked for a cut down version of the application form to be available for agents to use.

73. Note that once a business has exceeded the VAT registration threshold, it must notify HMRC of the liability within 30 days of the end of the month in which this happened. It becomes liable to start charging VAT from the start of the following month.

74. In practice this means that a business must issue invoices stating that a VAT registration has been applied for from the date when it must be registered, even though it cannot actually charge the VAT at that time. When the VAT registration is finally issued, there can be a considerable amount of additional invoicing for the VAT which is now chargeable on sales

during the interim period. The longer a VAT registration takes to come through, the greater the administrative burden on these businesses, which by definition are likely to be new or growing.

### How HMRC could improve its service to agents

75. We are concerned that overall service standards have not improved. HMRC continues to look for cost savings and efficiency improvements in line with the department's budget allocation. We gave respondents a choice of possible actions which HMRC could implement to improve overall service standards, allowing them to choose only one from a given list. We used the same list in 2007, 2009 and 2010 which is made up of suggestions made by our members.

76. The three areas which received most votes yet again were:

- better trained staff;
- nominated staff having ownership of problems; and
- e-mail access to HMRC.

77. We are pleased to note that in relation to the second of these, the new role of Agent Account Managers (AAM) has been developed specifically to deal with problem cases. Agents must register to use the AAM service and it is still early days. Their role is largely around communication, but agents can take problem cases, where they are having trouble getting something done through normal channels, to their AAM. We welcome this initiative and have asked our members for feedback.

E [anita.monteith@icaew.com](mailto:anita.monteith@icaew.com)

Copyright © ICAEW 2011  
All rights reserved.

This document may be reproduced without specific permission, in whole or part, free of charge and in any format or medium, subject to the conditions that:

- it is appropriately attributed, replicated accurately and is not used in a misleading context;
- the source of the extract or document is acknowledged and the title and ICAEW reference number are quoted.

Where third-party copyright material has been identified application for permission must be made to the copyright holder.

[icaew/taxfac.com](http://icaew/taxfac.com)

**BACKGROUND TO SURVEY SERIES**

1. HMRC was created in 2005 following the merger of the former Inland Revenue and Customs and Excise departments. At that time, it pledged to provide a more efficient and higher quality service while reducing staff numbers.
2. The results of the reforms being undertaken by HMRC under the efficiency programme include:
  - moving away from a local structure to one based on much larger offices;
  - increased use of call centres; and
  - concentrating specialisations in particular locations.
3. There is widespread concern that as a direct consequence, services 'on the ground' are less efficient, resulting in considerable wasted time and costs for taxpayers, agents and HMRC.

**2011 ICAEW member research into HMRC's service standards**

4. Our 2011 survey took place in June and July 2011 and asked similar questions to those in our three earlier surveys to make comparisons more meaningful. Most of our respondents are sole practitioners or work in small firms. The survey was not undertaken with a statistically selected population, but we believe it provides a useful snapshot of our members' experiences and the messages coming through are broadly consistent with our earlier surveys.
5. For the purposes of this evidence we focussed on the following key issues:
  - Telephone and post, including
    - Response time
    - Accuracy of HMRC processing
    - Technical knowledge of HMRC staff
  - Key areas of practical concern raised repeatedly by our members.
6. We also asked our members what actions HMRC could implement to improve overall service standards.
7. This year's online survey was live between 13 June and 18 July 2011 and received 172 responses.

## HMRC SERVICE ISSUES –WHAT ARE YOUR PRIORITIES?

### Results of ICAEW HMRC service standards survey in August 2011

Following our annual survey into HMRC service standards generally which was undertaken in June and July 2011, and as part of our Action on HMRC service issues, we carried out a further short survey in August 2011.

We presented the results of this second survey, as evidence at a meeting in September 2011 between the Professional bodies and senior HMRC officers.

In the survey, we asked members to prioritise the top 5 service issues they wanted HMRC to address. We received 287 responses of which 83% were from agents in practice and the results are as follows:

HMRC service issue	% of respondents who listed the issue in their top 5
Delays in receiving answers to postal queries	83%
Difficulty in contacting HMRC	64%
HMRC inability to resolve issues satisfactorily	56%
Delays in processing authorisations to act for clients(form 64-8)	45%
The inability to email HMRC with a problem	44%
Delays in receiving tax repayments	37%
Unhelpful advice from HMRC	20%
Level of debt chasing where little tax due	20%
Processing errors	20%
Online CT filing system for 31/3/11 accounting periods not being ready	17%
Level of security checks applied when HMRC phones you	15%
Late filing penalties being levied even though tax returns were lodged on time	13%
Level of security checks when you phone HMRC	12%
Delays in receiving VAT registration certificates	8%

We were also interested to learn that 74% of respondents had contact with HMRC at least once a week of which 27% were in contact daily. This is another indicator of poor service as there would be no need for such contact if processes were working well.

**THE TAX FACULTY'S TEN TENETS FOR A BETTER TAX SYSTEM**

The tax system should be:

1. Statutory: tax legislation should be enacted by statute and subject to proper democratic scrutiny by Parliament.
2. Certain: in virtually all circumstances the application of the tax rules should be certain. It should not normally be necessary for anyone to resort to the courts in order to resolve how the rules operate in relation to his or her tax affairs.
3. Simple: the tax rules should aim to be simple, understandable and clear in their objectives.
4. Easy to collect and to calculate: a person's tax liability should be easy to calculate and straightforward and cheap to collect.
5. Properly targeted: when anti-avoidance legislation is passed, due regard should be had to maintaining the simplicity and certainty of the tax system by targeting it to close specific loopholes.
6. Constant: Changes to the underlying rules should be kept to a minimum. There should be a justifiable economic and/or social basis for any change to the tax rules and this justification should be made public and the underlying policy made clear.
7. Subject to proper consultation: other than in exceptional circumstances, the Government should allow adequate time for both the drafting of tax legislation and full consultation on it.
8. Regularly reviewed: the tax rules should be subject to a regular public review to determine their continuing relevance and whether their original justification has been realised. If a tax rule is no longer relevant, then it should be repealed.
9. Fair and reasonable: the revenue authorities have a duty to exercise their powers reasonably. There should be a right of appeal to an independent tribunal against all their decisions.
10. Competitive: tax rules and rates should be framed so as to encourage investment, capital and trade in and with the UK.

These are explained in more detail in our discussion document published in October 1999 as TAXGUIDE 4/99 (see [http://www.icaew.com/~media/Files/Technical/Tax/Tax%20news/TaxGuides/taxguide\\_towards-a-better-tax-system.ashx](http://www.icaew.com/~media/Files/Technical/Tax/Tax%20news/TaxGuides/taxguide_towards-a-better-tax-system.ashx))