



HM Revenue  
& Customs

Stephen Smith

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Date: 11 September 2018  
Our ref: FOI2018/01820

Dear Stephen Smith

### **Freedom of Information Act 2000 (FOIA)**

Thank you for your request, which was received on 14 August, for the following information:

*"It has been announced to the media several thousand people have expressed an interest in CSLO2*

*Please can you advise:*

- 1) how many of those registered have been sent a follow up communication detailing the individuals specific accurately 'calculated' liability*
- 2) how many of those registered are still in the 'follow up' pipeline*
- 3) what happens to those that you fail to follow up in a timely manner"*

I have assumed you are specifically seeking information in respect of the Disguised Remuneration (DR) 'settlement terms' published on 7 November 2017 at: [www.gov.uk/government/publications/disguised-remuneration-detailed-settlement-terms/disguised-remuneration-detailed-settlement-terms](http://www.gov.uk/government/publications/disguised-remuneration-detailed-settlement-terms/disguised-remuneration-detailed-settlement-terms) which some are referring to as CLSO2. This is not a Contactor Loans 'settlement opportunity', the settlement terms apply across Disguised Remuneration scheme users. If this was not your intention please let me know.

HM Revenue and Customs (HMRC) are prioritising cases where users have expressed an interest to settle their tax affairs under the disguised remuneration (DR) settlement terms issued on 7 November 2017. All users who registered their interest to settle by 31 May 2018 should now have received a settlement pack. We have also advised agents representing groups of users what information is required from customers to progress their cases.

We are also prioritising expressions of interest to settle received after 31 May 2018 so that users receive their settlement packs as soon as possible and have every opportunity to submit them by the 30 September 2018.

Where users have subsequently provided the required information, we have referred these cases to our settlement teams for consideration and to progress towards settlement. On the most current information available, I can confirm that we have sent accurate calculations to majority of those users who have provided us with all the required information. In the

meantime we continue to work with the remaining users to progress their cases towards settlement.

HMRC takes a co-ordinated approach when allocating resources to enquiry and other compliance related work. Compliance staff can be assigned to a variety of tasks depending on their skills and our business requirements. This enables a flexible approach when deploying resources to tackle compliance risks and support key operational priorities like the settlement of DR avoidance cases.

We anticipate that flexible resourcing from within the Counter-Avoidance directorate and across wider HMRC Customer Compliance Group directorates will enable us to progress towards settlement, all those users who have approached HMRC and provide the required information by 30 September 2018. All users that provide us with the required information to settle by 30 September will be processed before April 2019.

Outside of the act, you might be interested in these recent information requests published on [whatdotheyknow.com](http://whatdotheyknow.com) regarding number of registration of interests in settling under the disguised remuneration settlement terms published on 7 November 2017 and HMRC resourcing to support the settlement of DR cases:-

- [https://www.whatdotheyknow.com/request/number\\_of\\_individuals\\_who\\_regist#incoming-1190854](https://www.whatdotheyknow.com/request/number_of_individuals_who_regist#incoming-1190854)
- [https://www.whatdotheyknow.com/request/settlement\\_resources#incoming-1227389](https://www.whatdotheyknow.com/request/settlement_resources#incoming-1227389)
- [https://www.whatdotheyknow.com/request/disguised\\_remuneration\\_settlement\\_3#incoming-1210931](https://www.whatdotheyknow.com/request/disguised_remuneration_settlement_3#incoming-1210931)

You also might like to be aware that on 18 July 2018 a 'HMRC issue briefing: disguised remuneration charge on loans' was published on GOV.UK. This provides additional information about the loan charge and is available at: [www.gov.uk/government/publications/hmrc-issue-briefing-disguised-remuneration-charge-on-loans/hmrc-issue-briefing-disguised-remuneration-charge-on-loans](http://www.gov.uk/government/publications/hmrc-issue-briefing-disguised-remuneration-charge-on-loans/hmrc-issue-briefing-disguised-remuneration-charge-on-loans)

If you are not satisfied with this reply you may request a review within two months by emailing [foi.review@hmrc.gsi.gov.uk](mailto:foi.review@hmrc.gsi.gov.uk), or by writing to the address at the top right-hand side of this letter.

If you are not content with the outcome of an internal review, you can make a complaint to the Information Commissioner's Office (ICO). Instructions about this process are available at the following link: <https://ico.org.uk/concerns/>

Yours sincerely,

Freedom of Information Team