

Fighting the good fight

[Sarah Scala explains the ethos behind the Contentious Tax Group, and describes its modus operandi](#)

I have been a regular contributor to HMRC EIP magazine for several years now, both in my role as Partner of NHD Tax Solutions Ltd and on behalf of the Contentious Tax Group. I founded the group more than three years ago and in this article I provide an update on the group and our insights and efforts in the tax disputes arena.

How it began

In 2021 I took on a new role developing a new tax disputes service offering and devoted considerable time to meeting with my connections and potential referrers, including tax disputes professionals, especially lawyers. I found myself having the same conversations and wondered if there was a better way, particularly as some of those I was talking to were mixing in the same circles as me.

I reached out to a handful of tax disputes connections and proposed that we meet monthly with no fixed agenda, in a confidential environment to share knowledge and discuss the challenges that come with dealing with HMRC on a daily basis.

For the next two years I arranged all monthly meetings, including quarterly face-to-face meetings in London, at offices kindly offered by group members. I spoke to any potential new members one to one to explain the purpose of the group, I produced and maintained a group handbook. I arranged guest speakers and prepared and submitted any freedom of information requests that the group thought would be insightful. I now wonder how I managed that in addition to my day job as the sole generator of new tax disputes assignments and I am proud that I have attended and chaired every group meeting since the group began.

Where we are now

The group has developed since those early days and I am now supported by a committee of volunteers, all running their own practices and/or holding senior positions in their respective firms. My motivation for establishing the committee was not to receive support with the running of the group, although that has been welcome – rather the opportunity for the group to live on beyond the career span of any of the individual members, me included.

The group is represented by more than 80 individuals from across the UK, Ireland and beyond. It includes tax advisers, specialist lawyers and barristers, all with HMRC disputes in common. The firms to whom the members belong is also varied. We also have a considerable number of individuals involved in the group who have previously worked for HMRC either as tax inspectors or as solicitors.

This magazine has kindly kept readers updated on some of the group's highlights, one being a visit to the House of Commons in November 2021 to raise awareness of issues facing UK taxpayers. We have also developed a relationship with senior members of HMRC's Fraud Investigation Service with whom we meet to discuss what's working well,

what is not working so well and how we can work together to improve the tax investigation process.

We are now recognised by HMRC as a group worth consulting with and have been given our own meeting to discuss the latest two HMRC consultations, an opportunity typically reserved for larger organisations.

The benefits

There are many benefits that the group offers. We have the opportunity to catch up each month at our group meeting, we socialise together at our quarterly face-to-face meetings. We are a ready-made referrer network to each other. The group provides new members with a reassuring balance of familiar faces and new ones, and it is particularly useful for anyone stepping away from a large team to build and develop a new team or service offering, as happened to me.

We are recognised as a national voice for the tax disputes profession and that has led to some high-profile and influential guests from the world of tax disputes at our meetings.

I recently spoke to a client about a challenging 'Time to Pay' issue, and afterwards emailed the group for support. I received eight immediate responses from barristers, lawyers and tax advisers, offering support based on real-life experience and insights into the HMRC team I was expecting to have to contact. That is a fantastic resource for group members to have at their fingertips and I would suggest that the Contentious Tax Group is the best tax investigations team in the UK, working together on a purely voluntary basis all in the interest of collaboration, cascading knowledge and investing in the next generation.

- Sarah Scala is a Partner at NHD Tax Solutions and founder of The Contentious Tax Group. Email Sarah@nhd-tax.co.uk if you are interested in joining the group, or want to find out more about what the group does