

# Tax Investigations Service Summary



## Service Period: 1 December 2025 to 30 November 2026

Our Tax Investigations Service is fully backed by an Insurance Policy, which we have taken out with Markel Tax.

## Service Protection

Fee Protection of up to **£125,000** is provided in the event of:

### Full and Aspect Enquiries into:

- ✓ Corporation Tax Returns
- ✓ Partnership Tax Returns
- ✓ Sole Trader Tax Returns
- ✓ Personal Tax Returns

### Disputes into:

- ✓ VAT
- ✓ Employer Compliance (PAYE, P11D and NIC)
- ✓ IR35

## Code of Practice 8 Enquiries (£5,000 limit of indemnity) and Inheritance Tax Enquiries (£5,000 limit of indemnity)

### HMRC use of Information and Inspection Powers/Sch. 36 Pre Disputes up to a limit of £125,000 in respect of:

- |   |                                |
|---|--------------------------------|
| ✓ VAT Reviews and Inspections                                   | ✓ Requests for Information     |
| ✓ Employer Compliance Visits                                    | ✓ Capital Gains Tax            |
| ✓ Check of Employer Records                                     | ✓ Gift Aid Audits              |
| ✓ Check of Coronavirus Job Retention Scheme (CJRS) Claims       | ✓ Construction Industry Scheme |
| ✓ Check of Self-Employment Income Support Scheme (SEISS) Claims | ✓ SDLT/LBTT/LTT* Enquiries     |
| ✓ National Minimum Wage Reviews                                 |                                |
| ✓ Interventions   |                                |

### Main Exclusions:

- Fees incurred prior to the written acceptance.
- HMRC Specialist Investigations, Civil Investigations of Fraud, Criminal Investigations Sections, Fraud Investigation Service and Counter Avoidance Sections.
- Corporation or Income Tax and VAT Returns submitted to HMRC more than 90 days after the due date.
- SDLT/LBTT/LTT\* and the 60 day Capital Gains Tax Returns submitted to HMRC after the due date.
- Notification by HMRC of any of the above incidents prior to subscribing to the service.
- Failure to notify/register for Tax or VAT.
- HMRC enquiries in respect of Import/Export Duty and Customs & International Trade Checks.
- HMRC enquiries into Research & Development Tax Relief Claims where the claim wasn't prepared by us.
- Compliance costs associated with routine submission of statutory Returns e.g. P11D's, RTI Returns, CIS Returns etc.
- Cases of suspected fraud e.g. Code of Practice 9 cases and Public Notice 160 Enquiries.
- Where there is no reasonable prospect of challenging HMRC (VAT, PAYE, CJRS, SEISS and IR35 Disputes).
- Costs for third party valuations.
- Tax planning arrangements where HMRC have allocated a DoTAS Number and/or bespoke tax planning arrangements outside of the normal trade.

In the event you face an investigation, we will represent you and reclaim any costs incurred in dealing with the enquiry directly from the insurance company. The practice will be responsible and have the discretion for dealing with any tax investigation enquiry. You will be responsible for any fees that we cannot recover from our Insurers.

## Business Legal Helpline – 24-hour, 365 days a year

### Employment, Health and Safety, and Business Legal Advice

Business clients who subscribe to the service also have access to a 24-hour telephone helpline. More information and details of how to access this service will be sent with your service confirmation.

## Business Hub

By subscribing to this service you will also benefit from access to a legal portal, Business Hub, provided by Markel Law. UK SMEs can face a wide range of challenges – the portal provides assistance to deal with the everyday legal issues around employment, health and safety, trading and contracts, cyber and data, debt and insolvency. Business Hub provides practical DIY templates and guidance around these topics. Business Hub is written and created by Markel's team of legal experts.

\* SDLT – Stamp Duty Land Tax/LBTT – Land & Buildings Transactional Tax/LLT – Land Transactional Tax enquiries are up to a limit of £5,000 indemnity.