



Chartered  
Institute of  
Taxation  
Excellence in Taxation



## Client Notification Letters

### Results of a survey of members of the Chartered Institute of Taxation (CIOT) and Association of Taxation Technicians (ATT)

#### 1 Introduction

- 1.1 Tax advisers had until 31 August 2017 to comply with the International Tax Compliance (Client Notification) Regulations 2016<sup>1</sup>. These regulations placed an obligation on tax advisers who provided offshore advice or services in the year to 30 September 2016 (beyond solely the preparation and delivery of tax returns) to send certain clients a notification comprising an HMRC branded document and standard wording for inclusion in a covering letter or email.
- 1.2 We surveyed our members during November 2017 for their views on how they approached compliance with the obligations and to obtain feedback on their experiences. The survey asked a number of specific questions about the approach members took to complying with the exercise, the challenges they faced in complying, the costs of complying, how clients responded and whether members thought the exercise achieved its objective. The survey also gave respondents the opportunity to add their own comments.
- 1.3 The survey was specifically directed at the person(s) who dealt with the notification exercise either for themselves (if practising as a sole practitioner) or for their firm.
- 1.4 210 members completed the survey. The survey questions and results are attached to this report in an appendix. Where percentages are quoted in this report they are percentages of members who responded to the respective survey question.
- 1.5 We have shared the results of this survey with HMRC.

#### 2 Executive summary

- 2.1 The survey reveals that respondents did not find the exercise straightforward. The time and costs involved in complying with the notification requirement were clearly an issue, along with resentment that members felt they were doing something that they thought HMRC should have been doing.

---

<sup>1</sup> [http://www.legislation.gov.uk/ukxi/2016/899/pdfs/ukxi\\_20160899\\_en.pdf](http://www.legislation.gov.uk/ukxi/2016/899/pdfs/ukxi_20160899_en.pdf)

- 2.2 Before imposing any similar requirement on tax advisers in the future, we would urge HMRC to review and evaluate the exercise to ascertain not only whether it achieved its objectives, but whether using tax advisers to communicate messages from HMRC to their clients was more effective than sending the messages themselves. We are happy for our survey results and report to form part of the review. Given the burden it placed on tax advisers, we think it would be unreasonable for HMRC to repeat the exercise without conducting such a post-implementation review. There should also be a comprehensive consultation undertaken with stakeholders before any similar obligations are imposed in the future.
- 2.3 Turning to some of the key findings of the survey; many respondents reported that it was difficult to identify the correct population of clients to whom a letter should be sent. This seems to be due to various reasons:
- the complexity of and difficulty in interpreting the legislation
  - the quality of HMRC's guidance
  - client databases that did not easily enable identification of the relevant clients
- 2.4 It appears that many advisers took the practical decision to send the letter to every client rather than adopt either the specific or general approach. 39.23% of respondents sent a letter to every client.
- 2.5 Respondents said that they found the exercise to be costly and time-consuming, with many reporting that they had not been able to, or not felt able to, recover the costs from their clients. Several commented that they felt the exercise should have been done by HMRC, rather than placing a legal obligation on advisers to send the letters.
- 2.6 A small but significant proportion (14.35%) of respondents reported that a client (or clients) had already come forward to disclose previously undisclosed offshore income or gains as a result of receiving the letter. Specific comments revealed only insignificant disclosures by clients that advisers were aware of. By our calculation, around 250,000 letters were sent out by our members who responded to the survey. That will represent only a proportion of the total letters that were issued. We would be interested to know if HMRC experienced a spike in people coming forward following 31 August 2017, and in what number. However, we suspect that it is too early to say with certainty whether the letter has or has not had the desired effect of increasing awareness amongst taxpayers of their obligations relating to offshore income and gains, and/or disclosures to HMRC.
- 2.7 There had been some concerns expressed beforehand by the agent community that the notification exercise might have a negative impact on the adviser/client relationship. It appears that these concerns were unfounded with 80.95% of respondents reporting that the exercise had no effect on the relationship. However, comments suggest that this must have been at least partly due to the way advisers managed the exercise and worded the letters in order to minimise any distress to clients.
- 2.8 Comments from members who received feedback from clients revealed that the letters caused worry and confusion for clients whose tax affairs were in general up-to-date and compliant. Respondents reported that dealing with queries from the 'worried compliant' was time-consuming and ultimately unnecessary. Several members reported very little, if any, response from any clients at all.

### **3 Question 1 - which approach did you adopt to notification?**

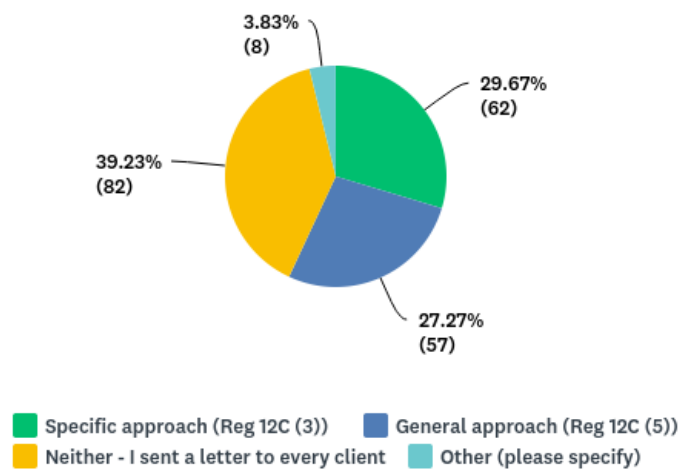
- 3.1 The largest number of respondents to this question (82 or 39.23%) sent a letter to every client. This option was specifically permitted by HMRC's guidance, as an alternative to

using either of the notification approaches contained in the Regulations. This would indicate that many members considered this option to be the most practical means of complying with their obligations.

- 3.2 The remaining respondents were evenly split between those that used the specific approach and those that used the general approach to notification. 57 members (27.27%) used the specific approach under Regulation 12C (3). 62 (29.67%) members used the general approach under Regulation 12C (5).

### Chart 1

#### Q1 Which approach did you adopt to notification?



- 3.3 Comments from respondents highlighted the difficulty many had in identifying the correct population of clients to whom the letter should be sent.

*"The most difficult aspect was in identifying clients to whom the notification letter applied. We adopted the specific approach because we didn't want to worry any clients by unnecessarily sending them the notification letter".*

*"The problem was ensuring that we had reliably identified all people to whom we might have given advice. We used the specific approach as we felt we had to consider all clients and former clients anyway, so we might as well go a little further and exclude them if we could - and, in 99.9% of cases, we could".*

*"The most difficult part was establishing whether what was contained in the tax return was enough to consider that the client had taken advice".*

*"Difficult to establish exactly what "offshore advice and services" covered and did not cover and who was included, for example beneficiaries of offshore trusts where we had advised the trustees".*

*"Significant time was taken [in identifying the clients] for the low number of letters sent".*

*"It took a long time as once we had a list of all clients who we advised in the period, we had to go through individually to check what advice was provided".*

*"We started under the general approach in an attempt to keep it simple, but this produced absurd results in terms of clients who would require notifications. Therefore we switched to the specific approach: more complex but a result nearer being in line with HMRC's stated aims".*

*“Trying to determine who should receive the letters was the most time consuming part of the exercise”.*

- 3.4 Comments from respondents who decided to send a notification letter to every client included.

*“In the end I decided that it was most beneficial to clients, HMRC and my firm to issue a letter to all personal tax clients even though this meant more work. I perceived that this would enable us to demonstrate that the matter had been considered if ever challenged by HMRC/CIOT. It seemed nonsensical not to undertake this approach if the point of the exercise was to encourage those clients who had not disclosed overseas income or gains on their tax returns [to come forward]”.*

*“The instructions were not clear enough. We felt under an obligation to send to all clients ‘just in case’. It has to be asked why HMRC imposed this costly exercise on agents without providing more definitive criteria”.*

*“Law plus guidance gave unrealistic requirements to allow targeting so the only way of protecting the firm was to mailshot all”.*

*“The most difficult aspect was deciding whether to risk insulting all my clients or just a handful of them. I decided to play safe (for me) and risk insulting all of them”.*

- 3.5 Some members commented that it had been problematic to identify clients who were no longer clients but had been clients at the cut-off date of 30 September 2016.

*“We did have to send separate letters to clients who we ceased to act for in the last year and that was time consuming to identify and write to them all separately”.*

*“The most difficult aspect was in identifying the clients we advised then but do not currently advise. Our firm had merged with a smaller firm in the interim and checking back through their records was particularly time consuming as we had to double check the data integration”.*

- 3.6 There were some general comments about HMRC’s consultation process when introducing the measure and the time it took them to produce guidance.

*“The whole exercise was a classic example of a good idea in principle being, in practice, heaping cost on the compliant firms to achieve little - other than risking client relationships. Consultation on the measure was appalling and very cloak and dagger: from the outset undermined trust. Also still livid at being required by law to insert prescribed text into a personal letter in our own name”.*

*“HMRC was very slow in issuing a draft of their letter and advice about it. It was particularly galling that HMRC assumed that because the client had foreign income that it had not been correctly disclosed in their tax returns”.*

- 3.7 However, some felt that the exercise was worthwhile.

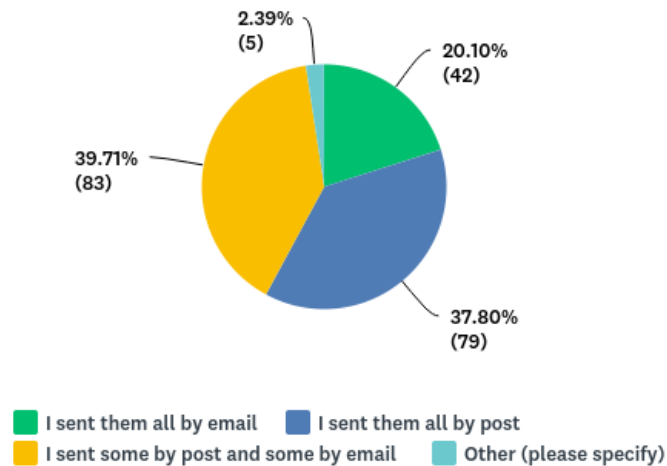
*“Given the importance of the content, I feel that I had a responsibility to ensure clients were fully aware of the implications of not disclosing offshore income now”.*

#### **4 Question 2 – how did you send the notification letters?**

- 4.1 There was an even split between members who sent all of their letters by post (37.80%) and those that used a mixture of post and email (39.71%).

## Chart 2

### Q2 How did you send the notification letters?



4.2 The notification could be sent by email, but only where advice and services were mainly provided to the client by email and it was reasonable to believe that they would read the notification if it were sent by email. 20.10% of respondents sent all their notifications by email. However, this created problems for one member.

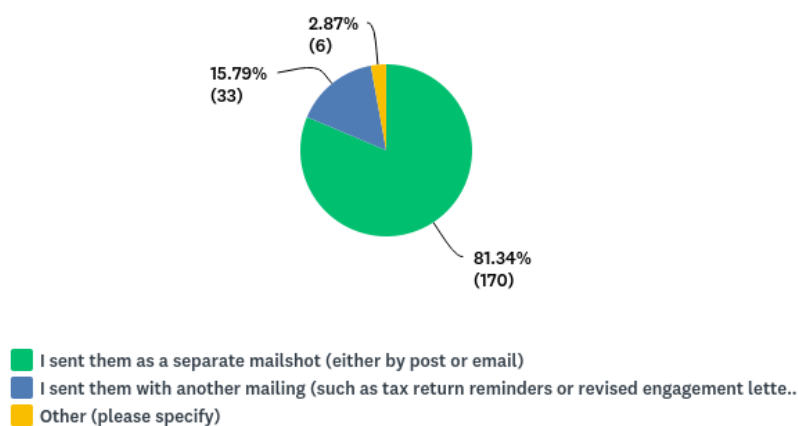
*"We initially used email notifications but on tracking those emails that were opened, we had to adopt post to complete the exercise".*

## 5 Question 3 – did you send the letters as a separate mailshot, or with another mailing?

5.1 The vast majority of respondents sent the letters as a separate mailshot (81.34%), compared with 15.79% who sent the letter with another mailing. This probably reflects the fact that the notification obligation was a stand-alone exercise that had to be completed by a fixed date, so did not lend itself to combining with other mailshots.

### Chart 3

### Q3 Did you send the letters as a separate mailshot, or with another mailing?



- 5.2 Several members made the point that it was very difficult and time consuming to arrange such a large scale mail-merge.

*“The most difficult aspect was the fact that HMRC assumed that firms have client data in a format which can be easily manipulated to get it into a ‘mail-merge’ form. In practice this was not the case. Most of our time was spent manipulating data to facilitate the mailmerge. The actual physical ‘sending’ did not take long or cost very much after this. Had we not adopted the generic approach the time taken (and cost) would have gone up exponentially”.*

*“The most difficult part was formatting the information into excel to prepare the mail merge letter (to accompany HMRC’s pdf file)”.*

*“The most difficult aspects were (1) logistics – mining our practice management software for relevant client lists at the relevant date and ensuring these were properly reviewed (2) coordinating mailing across numerous offices and (3) ensuring partners understood that it was essential to send the letters (unchanged), even where they had concerns the client would be upset”*

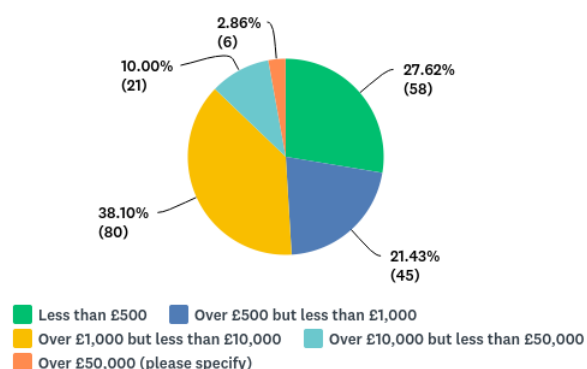
## 6 Question 4 – what do you estimate was the approximate total cost for your firm in sending the letters? Please include staff time, IT, stationery and postage costs etc.

- 6.1 The approximate total cost of sending the letters for just under a half of respondents (49.05%) was less than £1,000. A further 38.1% reported an approximate total cost of between £1,000 and £10,000, and 10% reported the cost as being between £10,000 and £50,000.

- 6.2 A handful of respondents reported that the approximate cost to their firms was over £50,000, with four respondents reporting a total cost of over £100,000.

### Chart 4

Q4 What do you estimate was the approximate total cost for your firm in sending the letters? Please include staff time, IT, stationery and postage costs etc.



- 6.3 The responses seem consistent with the type of entity respondents reported working for. This was asked by the final survey question (Question 13). 54.81% of respondents indicated that they worked either for a small practice or as a sole practitioner. One would expect the cost of the exercise for these firms to be less than the cost for much larger firms since they would be likely to have fewer relevant clients and less complex databases and systems to be reviewed.

*"As a small practice the identification of relevant clients was relatively straightforward. However I can understand that this would have been more difficult for larger practices".*

However, even for a sole practitioner the cost could be disproportionate.

*"As a sole practitioner the time spent and costs associated were the real burden".*

- 6.4 A significant number of respondents reported that the exercise was very expensive and time consuming to implement, and that they did not consider they could pass these costs onto their clients.

*"The sheer amount of time and manpower it took to undertake".*

*"A lot of cost which we cannot recover from clients".*

*"It was time consuming, and for a cost that could not be passed on to the client. I can see what HMRC was trying to achieve by this, but to pass the cost of this on to the accounting and tax profession which cannot be passed on elsewhere is wholly wrong and should never be repeated again".*

*"The most difficult aspect: having to set aside the time to read the regulations, watch the CIOT webinar, identify and select the clients, crafting the accompanying email to make it very clear that we were being forced to send these notifications by HMRC. No clients responded or commented on the notification. All in all a complete waste of time for a one-off exercise".*

*"In choosing the specific approach, we chose to write off time imposed by legislation reviewing entire client lists where not relevant for those clients. This is a statutory cost imposed on our business to comply with legislation, but not bother clients with unnecessary paperwork (for their circumstances)".*

*"I trust that this was a one-off exercise and HMRC will not expect us to write to clients on their behalf again without covering the costs".*

- 6.5 Several commented that they felt the exercise should have been done by HMRC and that it would have been more powerful as a result.

*"I do not see why HMRC couldn't send letter themselves. It is an imposition to compel advisers to do it".*

*"Why could HMRC have not issued the letter to all taxpayers rather than shifting the responsibility onto the professions?"*

*"Most clients said they would have taken more notice if the letter had come direct from HMRC".*

*"I do not feel that tax advisers should be put under an obligation by HMRC (with threat of penalties) to deliver a message that they could deliver themselves. We are not HMRC's mouthpiece".*

*"If HMRC wanted taxpayers to be aware of this they should have sent the letters themselves, as they have a full database to do this".*

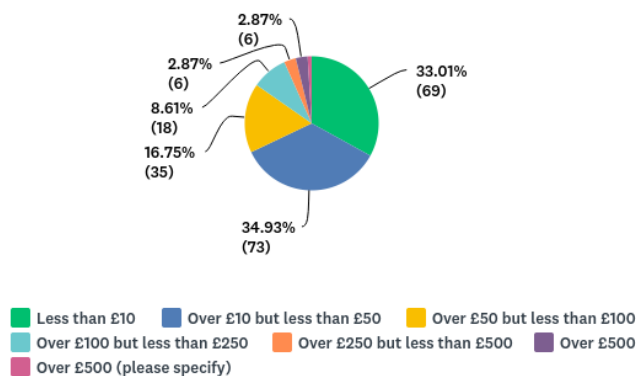
*"The whole exercise was a waste of agent time and money for which agents were not recompensed. HMRC should spend more of their own resources in publishing this information publicly rather than relying on agents to do their job for them".*

**7 Question 5 - what do you estimate was the approximate cost per letter sent of the whole exercise? Please include staff time, IT, stationery and postage costs etc.**

- 7.1 A third of respondents reported that the approximate cost of the exercise had been below £10 per letter sent, with another third reporting an approximate cost of between £10 and £50 per letter sent.
- 7.2 15% of respondents reported an approximate cost of over £100 per letter sent.
- 7.3 As noted in paragraph 6 above, the responses to this question seem consistent with the type of entity respondents reported working for. 54.81% of respondents indicated that they worked either for a small practice or as a sole practitioner, and 26.92% indicated working for a medium sized practice.

**Chart 5**

Q5 What do you estimate was the approximate cost per letter sent of the whole exercise?  
Please include staff time, IT, stationery and postage costs etc.



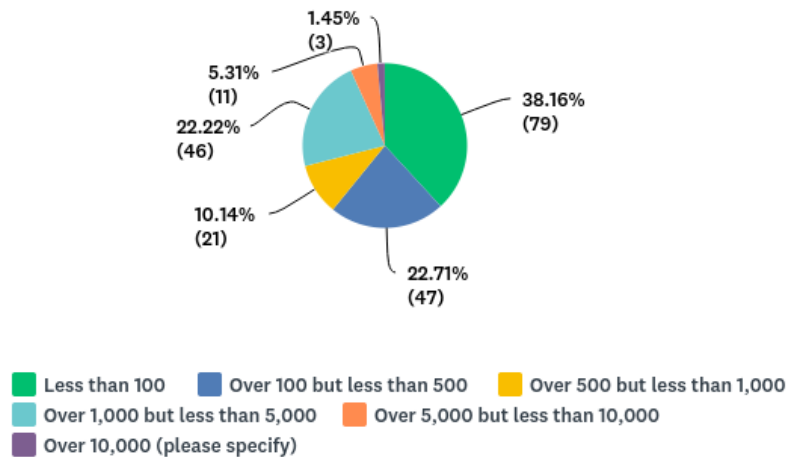
**8 Question 6 - approximately, how many notification letters did your firm send out?**

- 8.1 Just under two thirds of respondents (60.87%) sent out less than 500 letters with 38.16% sending out less than 100. A third of respondents sent out between 500 and 5,000 letters, with a very small number (14) sending over 5,000 letters.
- 8.2 As noted in paragraphs 6 and 7 above, the responses to this question seem consistent with the type of entity respondents reported working for. 10.58% reported that they worked for a top 20 practice and 0.96% for a Big 4 practice. One would expect larger sized firms to send out a greater number of letters than smaller firms, particularly if they took a practical decision to send a letter to every client.



**Chart 6**

Q6 Approximately, how many notification letters did your firm send out?

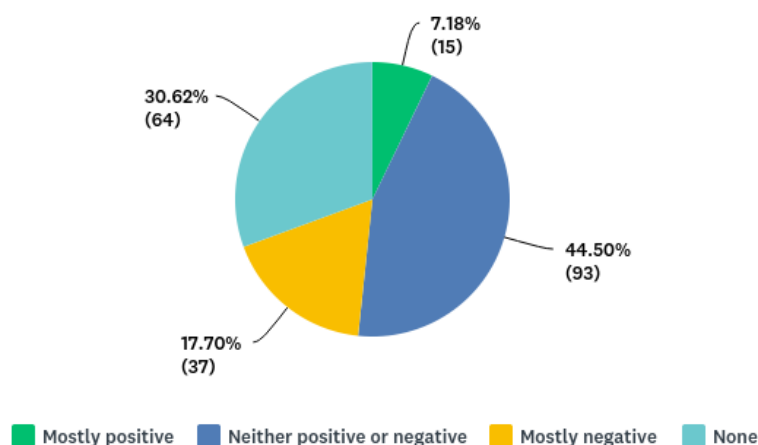


**9 Question 7 - what response did you receive from clients who received the letter?**

- 9.1 17.7% of respondents reporting that they had received a negative response from clients who received the letter with 7.18% reporting a positive response and 44.5% reporting they had received neither a positive or negative response from clients.
- 9.2 30.62% of respondents said they had received no response from clients, so it is not possible to know whether these clients felt negatively or positively about the letters.

**Chart 7**

Q7 What response did you receive from clients who received the letter?



- 9.3 Comments from members who received feedback from clients revealed that the letters caused worry and confusion for clients whose tax affairs were up-to-date and compliant.

*“The most difficult was reassuring clients with overseas income that we had correctly notified it in the past at the right time”.*

*"It worried conscientious clients who had to be reassured and did not prompt any disclosures".*

*"The most difficult aspect for me was reassuring clients that we were not suggesting that they had done anything wrong".*

*"Cost and wasted time in clients calling to ask whether I was now working for HMRC and generally confused over the contents of the letter and whether they should be concerned individually. This wasted a lot of time in the weeks following sending the letter".*

*"I didn't like having to send to the older generation. Although they had not done anything wrong they seemed to react with worry".*

*"Got lots of phone calls from elderly clients worried they had done something wrong (none had). It was very difficult to explain to these people why the letters had to be sent".*

*"The most difficult aspect was dealing with client comments- eg most felt it was a waste of time, some felt that HMRC's letter was very threatening in tone. Dealing with these emails took quite a bit of time and effort".*

9.4 Several members reported very little, if any, response from clients.

*"It is very hard to manage this scale of mailing and it was more or less ignored by clients. To the extent there was feedback it was positive. But there were only a handful of comments from 13,000 letters".*

*"We had very little response from clients".*

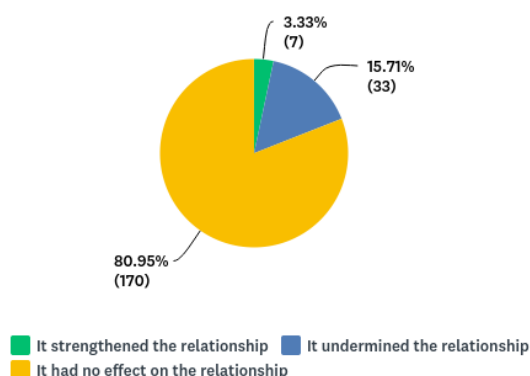
## 10 Question 8 - in your experience, overall how did the exercise affect the adviser/client relationship?

10.1 There had been some concerns expressed beforehand that the notification exercise might have a negative impact on the adviser/client relationship. It appears that these concerns were unfounded with 80.95% of respondents reporting that the exercise had no effect on the relationship. However, comments suggest that this must have been at least partly due to the way advisers managed the exercise.

10.2 A small number (15.71%) reported that the exercise had undermined the relationship while a smaller number (3.33%) reported that it had strengthened it.

### Chart 8

Q8 In your experience, overall how did the exercise affect the adviser/client relationship?



- 10.3 Comments indicated that many members thought carefully about the tone and content of the letters they sent to clients in order to manage their reactions and in order not to upset the client relationship. It is also clear that members had to act sensitively and devote sufficient time in handling follow up calls from concerned clients.

*"The most difficult thing was to get the tone right. We did not want to accuse our clients of anything and we would never normally have sent a letter of this type to them. Our overall approach was apologetic - we apologised for having to send such a letter".*

*"The most difficult part was assessing who should receive the letter, reading the excellent guidance by CIOT, and drafting the letter in such a way as not to appear to accuse clients of any wrongdoing, was very time consuming and/or difficult".*

*"Working out the wording so as not to damage the client relationship".*

- 10.4 Other members felt that the exercise did have a negative impact on their relationship with their clients.

*"I felt the exercise undermined the relationship I have with my clients. Clients felt obliged to reply to the letter and justify their foreign connections to me when there is nothing illegal about having foreign connections".*

- 10.5 Others felt that the exercise was unnecessary since they would provide this advice and information to clients anyway.

*"To force advisers to undertake the campaign was a draconian. We already have taken opportunities in routine mailshots and informative materials to encourage clients to make use of offshore disclosure facilities and warn them of the high penalties for non-disclosure".*

*"The subtext from HMRC of this letter was somehow part of the problem colluding in some way in undeclared income and taxes. This is far from the case and most practitioners in international tax spend most of their time collecting tax for HMRC via the various disclosure facilities".*

*"I found it quite offensive to be directed so specifically in the approach I had to take, when it is the client relationship that is individual, and in any case the subject had been considered in relation to clients without having this prescriptive course of action".*

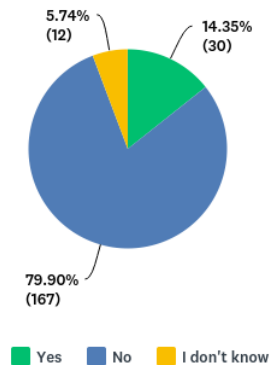
*"It was the logistics of targeting the clients with the material incorporating the HM Government narrative and then explanation required. The time taken was unacceptable as we already point out to clients that they need to disclose all aspects of their financial affairs annually so their tax position is reviewed annually".*

## **11 Question 9 - have any clients come forward to disclose previously undisclosed offshore income or gains as a result of receiving the letter?**

- 11.1 The main purpose of the letter was to inform relevant clients about the information HMRC is starting to receive about overseas accounts etc. under the Common Reporting Standard and to prompt them to review their UK tax affairs to ensure they are up-to-date, complete and accurate. It was therefore interesting to note that a small but significant proportion (14.35%) of respondents reported that a client (or clients) had already come forward to disclose previously undisclosed offshore income or gains as a result of receiving the letter.

### Chart 9

Q9 Have any clients come forward to disclose previously undisclosed offshore income or gains as a result of receiving the letter?



11.2 Specific comments received about disclosures by clients that were prompted as a result of receiving the letter did not reveal any significant disclosures, if anything the opposite.

*"Whilst I ticked the box to say a client came forward with undisclosed income, it was one client out of 1,000 and when we notified HMRC of the tax due, they wrote it off! What a waste of time for everyone. I do not appreciate being used in this way. It was extremely expensive for us and has put us under unnecessary pressure".*

*"Over 3,000 letters sent, two clients came forward to disclose, very concerned. It resulted in £nil additional tax declared however. A very costly, time consuming exercise. Most clients, if they responded said they were already aware what their responsibilities were and why were we telling them again".*

*"We had a lot more clients calling who didn't understand it or were concerned but for whom it was completely irrelevant than the handful who had something to consider".*

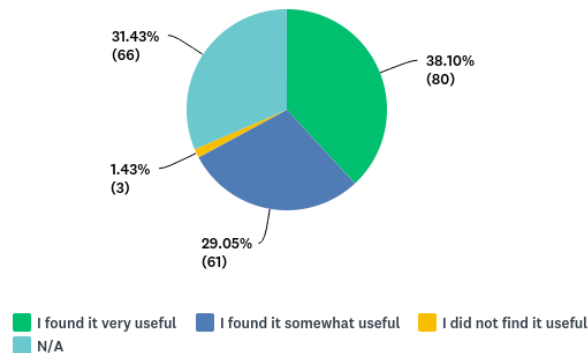
**12 Question 10 - The CIOT and ATT produced guidance material for members about the notification exercise in the form of a webinar, dedicated pages on our website, with links to the legislation and HMRC guidance, and several articles in Tax Adviser. If you accessed this information, please indicate how useful you found this material.**

12.1 67.15% of members who accessed our guidance material found it very useful or somewhat useful, with only 1.43% saying that they had not found it useful.

12.2 31.43% of members indicated that they did not access the information we provided.

### Chart 10

Q10 The CIOT and ATT produced guidance material for members about the notification exercise in the form of a webinar, dedicated pages on our website, with links to the legislation and HMRC guidance, and several articles in Tax Adviser. If you accessed this information please indicate how useful you found this material.



## 13 The Chartered Institute of Taxation

13.1 The Chartered Institute of Taxation (CIOT) is the leading professional body in the United Kingdom concerned solely with taxation. The CIOT is an educational charity, promoting education and study of the administration and practice of taxation. One of our key aims is to work for a better, more efficient, tax system for all affected by it – taxpayers, their advisers and the authorities. The CIOT’s work covers all aspects of taxation, including direct and indirect taxes and duties. Through our Low Incomes Tax Reform Group (LITRG), the CIOT has a particular focus on improving the tax system, including tax credits and benefits, for the unrepresented taxpayer.

The CIOT draws on our members’ experience in private practice, commerce and industry, government and academia to improve tax administration and propose and explain how tax policy objectives can most effectively be achieved. We also link to, and draw on, similar leading professional tax bodies in other countries. The CIOT’s comments and recommendations on tax issues are made in line with our charitable objectives: we are politically neutral in our work.

The CIOT’s 18,000 members have the practising title of ‘Chartered Tax Adviser’ and the designatory letters ‘CTA’, to represent the leading tax qualification.

## 14 Association of Taxation Technicians

14.1 The Association is a charity and the leading professional body for those providing UK tax compliance services. Our primary charitable objective is to promote education and the study of tax administration and practice. One of our key aims is to provide an appropriate qualification for individuals who undertake tax compliance work. Drawing on our members’ practical experience and knowledge, we contribute to consultations on the development of the UK tax system and seek to ensure that, for the general public, it is workable and as fair as possible.

Our members are qualified by examination and practical experience. They commit to the highest standards of professional conduct and ensure that their tax knowledge is constantly kept up to date. Members may be found in private practice, commerce and

industry, government and academia.

The Association has over 8,000 members and Fellows together with over 5,700 students. Members and Fellows use the practising title of 'Taxation Technician' or 'Taxation Technician (Fellow)' and the designatory letters 'ATT' and 'ATT (Fellow)' respectively.

The Chartered Institute of Taxation and Association of Taxation Technicians  
13 February 2018

## Appendix

### Client Notification Letters Survey Results

1. Which approach did you adopt to notification?

	Percentage	Responses
Specific approach(Reg 12C (3))	29.67	62
General approach (Reg 12C (5))	27.27	57
Neither – I sent a letter to every client	39.23	82
Other *	3.83	8
Total responses		209

\* of those responding 'other', three had used the specific approach, two had sent a letter to every UK resident client, one had sent no letters as they only filed tax returns and it was unclear what approach two had used.

2. How did you send the notification letters?

	Percentage	Responses
I sent them all by email	20.10	42
I sent them all by post	37.80	79
I sent some by post and some by email	39.71	83
Other*	2.39	5
Total responses		209

\* of those responding 'other', two sent some letters by post and some by email, one provided some in a meeting and the rest by email, one shared the notification exercise with another firm who emailed the letters and one answered 'n/a'.

3. Did you send the letters as a separate mailshot, or with another mailing?

	Percentage	Responses
I sent them as a separate mailshot (either by post or email)	81.34	170
I sent them with another mailing (such as tax return reminders or revised engagement letters)	15.79	33
Other*	2.87	6
Total responses		209

\* of those responding 'other', four used a mixture of both methods, one shared the notification exercise with another firm who sent the letters as a separate mailshot and one answered 'n/a'.

4. What do you estimate was the approximate total cost for your firm in sending the letters? Please include staff time, IT, stationery and postage costs etc.

	Percentage	Responses
Less than £500	27.62	58
Over £500 but less than £1,000	21.43	45
Over £1,000 but less than £10,000	38.10	80
Over £10,000 but less than £50,000	10.00	21
Over £50,000 (please specify)	2.86	6
	Total responses	210

5. What do you estimate was the approximate cost per letter sent of the whole exercise? Please include staff time, IT, stationery and postage costs etc.

	Percentage	Responses
Less than £10	33.01	69
Over £10 but less than £50	34.93	73
Over £50 but less than £100	16.75	35
Over £100 but less than £250	8.61	18
Over £250 but less than £500	2.87	6
Over £500	3.83	8
	Total responses	209

6. Approximately, how many notification letters did your firm send out?

	Percentage	Responses
Less than 100	38.16	79
Over 100 but less than 500	22.71	47
Over 500 but less than 1,000	10.14	21
Over 1,000 but less than 5,000	22.22	46
Over 5,000 but less than 10,000	5.31	11
Over 10,000	1.45	3
	Total responses	207



7. What response did you receive from clients who received the letter?

	Percentage	Responses
Mostly positive	7.18	15
Neither positive or negative	44.50	93
Mostly negative	17.70	37
None	30.62	64
Total responses		209

8. In your experience, overall how did the exercise affect the adviser/client relationship?

	Percentage	Reponses
It strengthened the relationship	3.33	7
It undermined the relationship	15.71	33
It had no effect on the relationship	80.95	170
Total responses		210

9. Have any clients come forward to disclose previously undisclosed offshore income or gains as a result of receiving the letter?

	Percentage	Responses
Yes	14.35	30
No	79.80	167
I don't know	5.74	12
Total responses		209

10. The CIOT and ATT produced guidance material for members about the notification exercise in the form of a webinar, dedicated pages on our website, with links to the legislation and HMRC guidance, and several articles in Tax Adviser. If you accessed this information please indicate how useful you found this material.

	Percentage	Responses
I found it very useful	38.10	80
I found it somewhat useful	29.05	61
I did not find it useful	1.43	3
n/a	31.43	66
Total responses		210

11. Please use the free space below for any other comments on the client notification letter exercise, including what, in your view, was the most difficult aspect of complying with the notification obligation.

*Responses to this question were in free text format. They have been analysed and have contributed to the report's findings. Where appropriate, representative comments have been used in relevant sections of the report.*

12. Please indicate which of the following professional bodies you belong to (tick all that apply)

	Responses
AAT	15
ACCA	28
ATT	88
CIOT	175
ICAEW	67
ICAS	7
Law Society or Law Society of Scotland	3
STEP	28
Other	8
Total responses	209

13. To help us analyse the results please state which type of entity you work for.

	Percentage	Responses
Big 4 practice	0.96	2
Top 20 practice	10.58	22
Medium sized practice	26.92	56
Small practice including sole practitioners	54.81	114
Legal practice	2.40	5
Other	4.33	9
Total responses		208