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HM Revenue & Customs
Exchange of Information Policy
14 Westfield Avenue
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19 December 2025

Dear Head of Policy

Registration of Trusts for the purposes of AEOI

We are writing to you collectively as each of the above organisations have expressed concern, and received queries from members, about the lack of awareness of the requirement to register trusts for AEOI, whether or not they have anything to report.

It was hoped that HMRC would make trustees aware of the AEOI registration requirement, the registration deadline and the potential penalties for non-compliance, in a series of press releases and communications over the course of the last few months. This has not happened and there appears to be a very high level of ignorance which we have been trying to urgently address. This extends much further beyond our members and we are collectively concerned that there will be a considerable number of lay trustees in the UK who remain completely unaware that this requirement exists. As such, the application of large penalties for non-compliance would appear to be unjust.

The AEOI system and registration process is not difficult and whilst the HMRC guidance is good there are

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still some areas of uncertainty. Trustees will now be used to processing applications such as these, having been familiar with the requirements of TRS for some time. However, it is not made clear within the AEOI system or HMRC guidance that there is a period where the user is “locked out” after an application to register is made, whilst HMRC process the application. This is more troublesome for the professional trustee who is likely to have a number of registrations to process. We appreciate that it is possible to bulk load up to 250 applications at a time but this is also not made clear. Once the initial application is sent, the delay before further applications can be processed may cause issues, especially for those unfamiliar with the system who are registering close to the deadline, as many will.

It is for these reasons that we would like to collectively express our concern about the application of penalties. We very much appreciate the communications that you have already had with CIOT/ATT and today’s Agent Update: Issue 138 confirming that HMRC will not issue penalties automatically. You have also stated that penalties for late registration will not apply if the trustee has a “reasonable excuse” for any delay in registering. If support is needed with registering, or a trustee thinks that they will be unable to meet the deadline they should email enquiries.aeoi@hmrc.gov.uk. We would welcome your reassurance on this position and seek some clarification of what would constitute a “reasonable excuse”. Deadlines for other aspects of taxation, such as MTD, have received considerable publicity. We appreciate that this is minor in comparison, which may not warrant the same exposure, but there does appear to have been a considerable lack of communication as there was prior to the introduction of the registration requirement for the TRS. We anticipate that this will inevitably result in large numbers of late registrations. We would ask for your leniency and understanding and welcome a light touch approach to penalties whilst trustees urgently work towards compliance.

Please respond by email to the addresses shown below.

Yours faithfully

TACT – The Association of Corporate Trustees
STEP – Society of Trust & Estate Practitioners
Chartered Institute of Taxation
Association of Taxation Technicians
Institute of Chartered Accountants in England & Wales
Institute of Chartered Accountants of Scotland
Law Society of Scotland

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