

CIOT impact 2024





150+
consultation responses

Public voice

308 quotations in mainstream media

99 journalists spoken with

141 citations in parliament

70k views of our 'tax explainers'

Making the tax system better



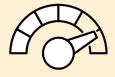
HMRC – Helpline cuts reversed following reactions from CIOT and others.



Non-doms – Improvements secured to government reforms, including temporary repatriation plans.



SDLT – first-time buyer relief defect corrected thanks to CIOT representations.



Service levels – extensive research study with ICAEW and 31 member firms to inform engagement with HMRC.



Self assessment – LITRG convinces HMRC to make it easier to download paper forms.

Branches & events

11,633

event and debate registrations

200+

branch committee members

Membership

91% of CTA students join in 2 years

4,064 CTA students

2,000+ ADIT completers

20,193 members

173 new DITT graduates

688 new members

Contents

The Members of Council (the Trustees) present their Annual Report and audited Financial Statements of the Chartered Institute of Taxation for the year ended 31 December 2024.

The Financial Statements comply with the Charities Act 2011, the governing documents and Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with Financial Reporting Standard applicable in the UK and the Republic of Ireland (FRS102) (effective 1 January 2019).

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About us

Our vision

We will remain the leading Institute for taxation professionals in the United Kingdom, serving the public interest through the pursuit of excellence and with integrity.

Our mission

The CIOT is the leading professional body in the UK for advisers dealing with all aspects of taxation. As a not-for-profit organisation our primary purpose is to promote education in taxation with a key aim of achieving a more efficient and less complex tax system for all.

Our purpose

The advancement of public education in taxation.

Our objects

The charitable objects of the Institute, as set out in our Royal Charter, are:

1. Advance public education in and the promotion of the study of the administration and practice of taxation and the principles of economic and political science in relation to taxation.

2 (i) To prevent crime and;

(ii) To promote the sound administration of the law for the public benefit by promoting and enforcing standards of professional conduct amongst those engaged in the provision of advice and services in relation to taxation and monitoring and supervising their compliance with money laundering legislation.

Our activities

Maintaining an educational and ethical framework of the highest standard aiming to produce tax advisers of the best quality for the general public - Chartered Tax Advisers.

- Working for greater public understanding of tax matters, including through:
 - Promoting tax discussion and debate.
 - Publishing and distributing information on tax matters.
- Setting ongoing educational and ethical practice requirements for tax advisers and reviewing compliance with those requirements.

- Supervising members for compliance with anti-money laundering regulations.
- Being available for consultation by legislators, regulators and administrators of tax law and others and by producing high quality representations and responses.
- Understanding the needs of taxpayers and making recommendations to improve and simplify tax law and administration for the benefit of all sectors of society.

Our objectives for the tax system

The CIOT works for a better, more efficient tax system for all affected by it; taxpayers, their advisers and the authorities.

Our objectives for the tax system include:

- Greater simplicity and clarity, so people can understand how much tax they should be paying and why.
- Greater certainty, so business and individuals can plan ahead with confidence.
- A legislative process which translates policy intentions into statute accurately and effectively, without unintended consequences.
- A fair balance between the powers of tax collectors and the rights of taxpayers (both represented and unrepresented).
- Responsive and competent tax administration, with a minimum of bureaucracy.

Our members

Membership of the CIOT is by examination, nationally recognised as the gold standard of UK taxation education.

Our members are at the heart of the CIOT and we are proud to celebrate a diverse membership and volunteer community. We work with tax institutes across the world in their domestic territories to grow the CTA family through the licensing of our Charter. We support more than 20,000 members and over 11,000 students (CTA, ATT-CTA and ADIT) throughout their tax careers, providing assistance through our London based head office, our regional network operating across the UK, and partnering with the growing CTA family worldwide.

The CIOT is a registered charity in England and Wales, number 1037771 and a regulatory body for the purposes of anti-money laundering supervision of tax practitioners.

President and Chief Executive's report



In many respects, 2024 felt like a year of change, both inside and outside our Institute. The election of a new government with a different political hue brought headline grabbing changes to tax policy, as our Institute celebrated a big member milestone and put in place plans for the evolution of the CTA qualification.

Membership

Having come tantalisingly close to reaching our 20,000th member in 2023, it was a real source of pride for us when we reached this significant member milestone in February. From our 12 founding members nearly a century ago, Rachael Brown's admission as our 20,000th CTA, along with the 688 new members who joined over the course of the year, means that our membership now stands at 20,193. Take a look at page 31 to see how our membership has evolved with time.

It is nearly a quarter of a century since we held our first admissions ceremony. The event is a great way to share the accomplishments of members new and old. In addition to the 119 new members and 15 prize winners, we were able to recognise five members with a combined 260 years of membership.

As the pandemic fades ever further into the distance, more and more of our branches are looking at ways of bringing back in-person events, as many members have told us they value the chance to get together with their peers when they can. The Branch Network has been working hard to make this happen, and last year more than doubled the number of face-to-face CPD and social events available to our members. While there has been a focus on increasing the availability of in-person events, our online events remain popular with members. Despite there being slightly fewer events, registrations remained high.

Education and exams

Congratulations to the 614 students who passed their exams and qualified for membership. We now have over 7,500 students registered for either the CTA qualification or the ATT-CIOT Tax Pathway. Our CTA students include those pursuing joint programmes with ICAEW and ICAS.

2024 saw Council approve the next step in our plans to review the CTA qualification to ensure it maintains its relevance and importance to candidates, employers and the wider tax profession. We want as many people as possible to have their say on the proposals, and a public consultation will take place in the coming year to help shape the final proposals.

The Diploma in Tax Technology (DITT) continues to be a success with 173 students achieving the qualification in 2024. It takes the total number of graduates to 259 since we launched the syllabus in 2022. Our thanks to Paul Aplin, Shan Sun and the DITT Committee for ensuring the qualification remains relevant and current. Our new 'Artificial Intelligence (AI) for Tax' course will launch at the start of 2025 and we hope will become part of our DITT offering with time. You can read more about the work we are doing to respond to the rise of Al in a special feature on pages 12 and 13.

ADIT, our international tax qualification, celebrated its 20th anniversary in 2024. Today, nearly 4,000 students are pursuing the qualification across 120 countries. We have come a long way since the first four exams were sat in 2004. We completed a strategic review of ADIT in 2024 which resulted in our withdrawal from a small number of jurisdictions where demand was very small.

Service levels

It was a case of déjà vu as far as HMRC's service levels were concerned. It came as a relief in March when then Chancellor Jeremy Hunt stepped in to stop planned permanent cuts to several telephone helplines, moves both CIOT and our Low Incomes Tax Reform Group (LITRG) had been strongly critical of. HMRC's shift to digital is the right strategy, but until those services can meet demand, they need to be properly backed to meet current demands by phone and post.

The continuing problems over service levels provided the impetus for us to join forces with ICAEW's Tax Faculty to interrogate the customer service challenges facing HMRC. In December, our organisations published a report, Tackling HMRC's customer service challenge, which found that HMRC could potentially save 1.7 million hours of staff time a year – worth around £36 million – if it eliminated the need for chasing calls by introducing an automated system for tracking taxpayer queries. Our paper has gained traction with officials and the government and efforts to secure progress are continuing.

Tax policy

The General Election was always going to be a case of 'when', rather than 'if', but we were probably not the only organisation to be taken by surprise when Rishi Sunak settled on an early–July vote. There can be little denying the significance of the result, with the Labour Party returning to power after 14 years in opposition and with Britain's first female Chancellor.

During the election campaign we set ourselves two main objectives: to use the election, in keeping with our public benefit remit, to promote understanding of tax issues in the news to the general public, and to use the opportunity to draw political attention to key tax administration issues such as HMRC resourcing, tax simplification, better tax policy-making and an effective approach to digitalisation. The first of these we delivered by engaging with the media and through producing a series of policy 'explainers', which were viewed nearly 70,000 times during the year.

For the latter objective, we wrote to the main parties' spokespeople at the start of the campaign identifying key issues and linking them to the success of the economy. We gained some media attention on this agenda, including an opinion article in the Financial Times.

We've continued to engage with the main parties on these issues since the election, helping to move effective tax administration up the political agenda. We were gratified when the new tax minister James Murray invited us and other tax bodies in for a meeting on this topic during his first few weeks in post. Murray has since become chair of HMRC's board, signalling that he is making these issues a priority.

A new government means new tax policies, and our technical team has been hard at work considering the implications of a range of tax changes including (but not limited to) non-doms, national insurance, VAT on school fees and changes to Inheritance Tax. The influence of our technical team driving changes to legislation, guidance and procedures is significant and can follow many months, even years, of hard work. The team have started publishing examples of their successes on the CIOT website, which should give you a flavour of the breadth and depth of their work.

LITRG

It has been another stellar year for the LITRG team. They were rightly recognised for their achievements in May when they scooped the Tolley's Taxation Award for 'Outstanding Contribution to Taxation in 2023–24 by a Not-for profit Organisation'. Congratulations to Victoria Todd and her team for their outstanding work.

One area that the team has been closely involved with is the 'gig economy', and the new rules that mean HMRC is able to find out more about the money made by people selling on online marketplaces like eBay and Uber. In January, LITRG were quick off the mark to counter misreporting of a new 'side hustle tax', and the subject remained a big focus of their work. There is a new look and feel to the LITRG website too, which should make it easier for people looking for the team's tax guidance.

Standards

We were pleased with the outcome of our inspection in February from the Office for Professional Body Anti-Money Laundering (OPBAS). That they expressed encouragement with the effectiveness of our supervisory activity is testament to the work of Head of Professional Standards, Jane Mellor, and her team who continue to work with OPBAS to take forward the action points identified in their assessment.

The government continued to take forward proposals for regulation of the tax profession and we are grateful to our members for their input in shaping our response.

We are broadly supportive of the idea of mandatory registration and that this should require membership of a recognised professional body like ours. However, there is still a lot of work to be done to flesh out the details and work will continue into 2025.

People

It was another busy year for CIOT, and the successes in this Annual Report are down to the hard work and commitment of our teams across the organisation. Whether it is supporting members, paying the bills, dealing with the press or influencing government policy, everyone has a role to play in making sure the Institute and tax system works as well as it can.

In October, we acknowledged the contribution of our members and volunteers at a reception in London, including Craig (now Lord) Mackinlay CTA. Many of you will be aware of his battle with sepsis and his stoicism in the face of adversity. During his nine years as an MP, Craig was a strong supporter of CIOT and adept at highlighting problems with the tax system. It was a pleasure to welcome him, his wife Kati and their daughter Olivia to recognise his contribution, which we hope will continue in the years to come.

The year saw us welcome three new faces to Council. Alistair Cliff, Shan Sun and Sofia Thomas each have valuable contributions to make to our work and we are grateful that they have chosen to share their talent and expertise with us. Penelope Tuck will leave Council after six years and we thank her for all her thoughtful contributions, including as chair of the Nominations Committee. Krzysztof Mikata-Pralat's term as Lay Representative will end in the autumn and we thank him for the support he has given to the Institute.

We would like to take this opportunity to thank our members, volunteers and teams for your continued support.

Charlotte Barbour CIOT President (2024 - 2025)

Helen Whiteman CIOT Chief Executive

Our values

Collaborative

We value working constructively with stakeholders to achieve our goals.

Committed

We are focused on and dedicated to the consistent delivery of our charitable objectives and services.

Empowering

We encourage and enable personal growth and seize opportunities.

Ethical

We act with integrity, promoting high ethical standards and accepting accountability for our actions.

Inclusive

We welcome, respect and value everyone and actively consider how to be accessible.

Progressive

We are future focused, constantly learning and driving improvements that deliver enhanced service excellence.

Public Benefit report

The CIOT is an educational charity with the consequent obligation to work for the public benefit. CIOT Council has considered the guidance published by the Charity Commission and concluded that the CIOT's core activities, as described in this report, satisfactorily address the principles of identifiable public benefit and demonstrate that the charity has fulfilled the public benefit requirement under Section 17 of the Charities Act 2011.

Report from the CIOT's Lay Representative

It is with great pleasure that I present my third and final report as the Lay Representative of the Chartered Institute of Taxation (CIOT).

Reflecting on 2024, it has been another dynamic and impactful year for the Institute, marked by significant achievements, diligent oversight, and a steadfast commitment to the organisation's charitable objectives and public benefit requirements.

Council Proceedings

Throughout the Council proceedings I attended, it was clear that members consistently embrace their role as charity trustees. The Council views CIOT as a charity and operates with an evident commitment to its core purpose. Members actively engage in discussions, demonstrating a culture of constructive challenge towards the executive team to maximise the organisation's positive impact.

On occasions when the Council decided not to adhere fully to the Charity Governance Code, these decisions were made following thorough review and reflection.

Such deviations were in line with Code's guidance: "apply or explain". A notable example was the decision to cap the maximum number of trustees at 25 and the reasons behind it are fully explained in this report. Decisions around governance matters, such as reviewing the investment policy or considering payments to trustees, were consistently informed by the Charity Commission's requirements and best practice guidelines. This approach ensured that individual and collective powers were exercised thoughtfully and appropriately.

Key Developments and Achievements

2024 witnessed notable progress and growth in several areas. One significant achievement was the development of a comprehensive public education strategy, segmented into three key audience groups:

- Individuals with an interest in tax catering to those seeking to deepen their understanding of taxation.
- Unrepresented taxpayers providing specific and accessible information for individuals without professional representation.
- The wider public fostering general awareness of taxation and its societal importance.

As always, there has been outstanding work by the Low Incomes Tax Reform Group (LITRG), which continues to serve as "a voice for unrepresented taxpayers." Led by Victoria Todd and her team, LITRG remains proactive in discovering innovative ways to engage and support this diverse audience.

Website articles and YouTube videos explaining different areas of taxation such as inheritance tax or capital gains tax, prepared by George Crozier and the External Relations Team, had positive feedback from the public.

Another noteworthy area is the work of the Taxation Disciplinary Board (TDB). The TDB ensures that complaints about poor practice in tax advice are independently reviewed, thereby upholding public trust in the profession. These initiatives exemplify the Institute's commitment to public benefit and accountability.

Moreover, the Institute continued to support tax education via the provision of grants to two fellow charities: TaxAid and Tax Volunteers (known as Tax Help for Older People).

Additionally, several policies were introduced or enhanced by the Council to strengthen governance and transparency, these included:

- Volunteering policy.
- Serious Incident Reporting Policy, ensuring clarity and accountability in the reporting of serious incidents to the Charity Commission.

Council members also benefitted from annual trustee training and access to expert advice from a leading charity law firm, further equipping them to fulfil their responsibilities effectively.

Future Opportunities

I am confident the Council and staff team will continue to challenge themselves and achieve even greater progress in years to come in areas such as:

Voice of the Public

- Raising awareness of the TDB to ensure the public is better informed about how and when to make complaints.
- Further promoting the work of LITRG to ensure that even more people can benefit from its excellent support.
- Expanding LITRG's user-led focus by, for example, introducing customer panels, ensuring that it remains attuned to the needs and experiences of the public it serves.

Equality, Diversity, and Inclusion (EDI)

- Building upon the excellent work of the Nominations Committee to further diversify the Council's membership.
- Developing initiatives that position a career in taxation as an attractive option for individuals from diverse backgrounds, thereby enriching the profession with varied perspectives.

Public Tax Education and Crime Prevention

 This could include for instance introduction of awards to recognise and encourage exceptional work in public tax education and initiatives that prevent financial crime.

These areas represent opportunities for CIOT to deepen its impact and continue to fulfill its charitable objectives with excellence.

Personal Reflections

Serving as the Lay Representative has been an enriching and transformative experience for me. It has broadened my perspective and nuanced my thinking, for which I am profoundly grateful. The Council's role in governing CIOT is multifaceted and complex, encompassing its status as a company established under Royal Charter, a registered charity, a membership organisation for tax professionals, an anti-money laundering regulator and potentially, in the future, a regulator of the tax profession.

Despite these complexities, the Council performs its duties with grace and diligence, ensuring that public benefit remains at the heart of its thinking and decision-making.

Acknowledgements

Finally, I would like to extend my heartfelt gratitude to the executive and wider staff team at CIOT. Their professionalism, dedication, and encouragement have been invaluable throughout my tenure. In particular, I would like to thank Helen Whiteman and Roz Baxter for their unwavering support and guidance.

In conclusion, it has been an honour to serve as the Lay Representative. I leave with great confidence in CIOT's ability to continue delivering on its mission and to further its role as a leading organisation in the tax profession and in the charitable sector.



Lay Representative Krzysztof Mikata-Pralat

THE YEAR IN TAX - 2024

JANUARY

New rules requiring online platforms like eBay and Deliveroo to send HMRC information on the activities of people making money on their websites helps to fuel misinformation that a new 'side hustle tax' has been introduced.





FEBRUARY

The Finance Act 2024 becomes law, making full expensing permanent, relaxing the cash basis and allowing offsets for taxes paid by workers incorrectly categorised as being outside the IR35 off-payroll rules.

MARCH

"Big, permanent cuts" to HMRC's telephone helplines are reversed after Chancellor Jeremy Hunt steps in to order their reversal. CIOT had described the original plans as "misguided".





APRIL

HMRC research finds that more people are moving into Scotland than leaving despite higher tax rates. But there is evidence that some higher earners have left in response to income tax divergence.

MAY

The National Audit Office says taxpayers are being let down by poor customer service as it finds taxpayers spent nearly 800 years on hold waiting to speak with HMRC in 2022-23.





JUNE

The 'tax gap' hits a record high in cash terms (£39.8bn) but a record low as a percentage share of the tax that should have been collected (4.8%) in 2021–22.

JULY

Rachel Reeves becomes Britain's first female Chancellor as the Labour Party wins the General Election. Plans to charge VAT on private school fees are included in the King's Speech later that month.



AUGUST

HMRC sends nudge letters to cryptocurrency investors it suspects of having sold assets without declaring gains or income.

SEPTEMBER

The Budget Responsibility Act becomes law, giving the Office for Budget Responsibility the power to make judgements on any major tax and spending proposals announced by the government.



OCTOBER

Reeves' first Budget as Chancellor proposes £40 billion of tax rises. Headline-grabbing changes include increases to employer National Insurance and Capital Gains Tax, along with changes to Inheritance Tax.

NOVEMBER

Donald Trump is elected President of the United States for a second time, with a policy platform that includes a proposal to make the tax cuts of his first term permanent and to introduce tariffs on foreign imports.







CIOT AND ICAEW REPORT

Tackling HMRC's customer service challenge

DECEMBER

A CIOT and ICAEW report says HMRC could save 1.7 million hours of call handlers' time if it introduced an automatic system to keep track of taxpayer queries.

Artificial Intelligence

Artificial Intelligence (AI) has grown in prominence in recent years as the technology grows in strength and impact.

What was once a science fiction dream, Al is creeping into almost every aspect of our professional and personal lives. As its rise continues at pace, CIOT have been investigating how the technology can be leveraged to support our ambitions.



Working group

In April, we established a working group to explore how Al could be used across departments. The group's work led to the publication of CIOT's first Al usage policy, which aims to ensure we follow best practice and use Al responsibly and ethically.



Debating the role of Al in tax practice

Al continues to be a hot topic of discussion at our events. Speakers at June's CTA Address concluded that despite its 'inevitability', Al will still need a human touch.

In August, we launched a 'Tax Technology' podcast series. Hosted by Shan Sun, the series looks at the interaction between tax and technology and at September's Autumn Residential conference, speakers led by CIOT Vice President Paul Aplin considered the role of AI in professional tax practice.



Piloting Al

Teams across CIOT have run pilots to look at how different AI platforms can support their work. For example, the External Relations team have experimented with ChatGPT and similar tools in the drafting of parliamentary reports and press releases. Our all-employee day in September gave staff the chance to learn more about how AI can support their work.

C-AI-OT?



Al's increasing prominence has led CIOT and LITRG to consider our own Al tools. ChatCIOT, ChatLITRG and ChatTax have all been trademarked in anticipation of their development and future use.



Qualifications

New modules and course content is being integrated into the CTA qualification and Diploma in Tax Technology (DITT). A new short course, 'Al for Tax' was launched in December to encourage students to consider enrolling in DITT. A joint 'Al Ethics in Tax' course with ATT has been developed and is due to launch in January 2025.

Promoting debate on tax

The Institute holds regular public debates, supporting our objective of creating a well-informed tax policy debate. These are often organised jointly with the Institute for Fiscal Studies. In 2024, CIOT held a range of in-person and online debates on topical tax issues.

You can watch these at tax.org.uk/videos-and-audio.

Should VAT be charged on private school fees?

CIOT/IFS

Online debate





Should VAT be charged on private school fees?



The Labour Party's plan to charge VAT on school fees was the focus of the first CIOT/IFS debate of 2024.

Stuart Adam of IFS said the money raised by the measure was significant but not transformative. Kerry Sykes of the Charity Tax Group, spoke about the 'nuanced' rules around the implementation of VAT in the education sector.

Sam Freedman of the Institute for Government said the most successful education systems were not heavy users of private schools. Julie Robinson, the Chief Executive of the Independent Schools Council, was concerned about its impact on smaller, specialist schools and their ability to function.

The 2024 Chartered Tax Advisers' Address heard from Conrad Young of the Oxford Internet Institute on the potential for Artificial Intelligence to "transform the tax world". Young, a former Chief Digital Officer with Deloitte, told the audience in London that the technology should be taken "seriously, albeit with a degree of scepticism".

Young was joined by Shan Sun, Tax Technology Lead for Deliveroo, and Bivek Sharma, PwC's Chief Technology Officer. The address was chaired by CIOT President Charlotte Barbour.

You can read more about how CIOT is responding to the challenges and opportunities of AI on pages 12 and 13.

How will Artificial Intelligence affect the tax system?



Tax priorities for the new parliament

CIOT/IFS Online debate







Tax priorities for the new parliament









A new government and a new parliament means new priorities for the tax system, all of which were considered at this online debate in July.

For IFS, Helen Miller argued that the new government should consider a review of the way the tax system works. Alice Jeffries, Head of Tax Policy at the Confederation of British Industry (CBI), said businesses wanted to see stability and certainty to drive economic growth.

CIOT's Head of Tax Technical, Richard Wild, called for improvements to the tax policy process and more support to help people get their tax right. The Guardian columnist Polly Toynbee was optimistic about the Chancellor's reforming credentials.

What should be in the business tax roadmap?



Predictability and a clear direction of travel to promote investment, according to speakers at our September debate.

David Gauke, who as tax minister oversaw the introduction of the coalition government's 2010 roadmap, said it had been a "good move" that "set out a pro-growth, pro-openness [and] proinvestment case in a time of austerity".

Helen Miller of IFS wanted to see the new government's roadmap provide certainty on the future of the corporation tax rate, which Dominic Mathon of RELX said had impacted the UK's competitiveness. Ellen Milner, CIOT's Director of Public Policy, spoke about the need to ensure small businesses are included in the roadmap.

Many people have been priced out of home ownership, but there is little the tax system can do to address this.

Speakers at the final CIOT/IFS joint debate of 2024 considered a range of taxes that affect property and home ownership, including incentives for property owners, landlords and renters, the 'distortionary' stamp duty land tax and the need for fundamental reform of property taxation.

Chaired by Helen Miller, with contributions from Stuart Adam (IFS), Meera Chindooroy (National Residential Landlords Association), John Powlton (British Property Federation Tax Committee) and Josh Ryan-Collins (Professor of Economics and Finance, University College London).

How is tax damaging the housing market, and how can we fix it?



What does sustainable finance need from the tax system?



In May, CIOT hosted a tax policy roundtable in partnership with the City of London Corporation focused on the role of the tax system in delivering Net

With the financial services sector committed to the delivery of sustainable finance, the event was designed to encourage open discussion and creative thinking about how the UK's tax system could help to drive domestic net zero commitments while competing globally for new investment, growth, and jobs.

The event was chaired by then CIOT President Gary Ashford, with contributions from Irem Yerdelen of the City of London Corporation, Sue Holmes of Deloitte and other leading tax, finance and sustainability professionals.

Working for a better tax system

Report from the CIOT Technical Committees

The CIOT's technical work is driven by our public benefit objectives, including seeking a simpler, more workable tax system and ensuring the needs and interests of the public are considered by policymakers.

In 2024, we made 138 written submissions (2023: 159) to HMRC, HM Treasury (HMT) and other government and parliamentary bodies across the UK, and held 299 meetings (2023: 292).

Our committee chairs and vice-chairs are listed on page 42. We are grateful to them and the other volunteers who give their time to lead or participate in our technical activities.

Keen to ensure that we recognise and celebrate our impact, during 2024 we started publishing our 'successes'. These are issues where we have been instrumental in influencing changes to legislation, HMRC guidance or procedure, or where our efforts were singled out for recognition by revenue authorities or other stakeholders.

Technical Policy and Oversight Committee

Some of the CIOT's technical work is led by the Technical Policy and Oversight Committee (TPOC), either because it is of strategic importance or spans several committees. Through TPOC we engage with senior HMRC staff at the Representative Bodies Steering Group and Guidance Strategy Forum, and are represented on HMRC's Charter Stakeholder Group.

HMRC's service levels continued to be an area of significant concern. Together with the Institute of Chartered Accountants in England and Wales (ICAEW), and with the support of over 30 agent practices, we undertook a comprehensive data gathering exercise to capture experiences of HMRC customer service. In December, our organisations launched a report "Tackling HMRC's customer service challenge". The report has already gained traction with many

Being an election year, we sought to raise the profile of tax and priorities for the new government. We wrote to the main political parties setting out pressing issues around tax administration, covering topics including customer service, digitalisation, simplification and adhering to tax policy making principles. We also published several 'explainers' about political parties' tax policies.

stakeholders and we will be building on this in 2025.

In March, representatives from TPOC hosted a group from Confédération Fiscale Européenne (CFE) Tax Advisers Europe for discussions on areas of mutual interest. CIOT continues to represent the UK at CFE, alongside the ICAEW Tax Faculty.

Private Client (UK)

Sustained pressure from CIOT and other bodies on HMRC's Trusts and Estates Agents Advisory Group led HMRC to revise and update its IHT100 forms for Inheritance Tax (IHT) and associated guidance for reporting lifetime and trust transfers. Similar pressure resulted in the publication of helpcards on various aspects of the Trust Registration Service (TRS) in the Trust Reporting Service Manual.

We contributed to CIOT's response to the June consultation on improving the effectiveness of money laundering regulations relating to simplifying TRS reporting requirements. Since the Budget, the committee has focused on proposals to reform IHT Agricultural Property Relief and Business Property Relief, and to bring unused pension funds into the scope of IHT.

Private Client (International)

The committee focused on changes to the tax regime for non-domiciled individuals first announced in March 2024 and largely confirmed by the new government in October's Budget. The committee submitted evidence to HMRC and HMT on proposals for foreign income and gains, the temporary repatriation facility and IHT. Several recommendations made were adopted in the Finance Bill 2024-25 and we provided commentary on the draft legislation. We also responded to the first consultation on the Capital Gains Tax (CGT) treatment of carried interest.

Corporate Tax

Consultation on aspects of capital allowances continued at the start of 2024 but was paused by the election. The new government's Corporate Tax Road Map confirmed there would be a further consultation on capital allowances. The Road Map was published following an informal consultation CIOT contributed to, including direct engagement with the Exchequer Secretary, James Murray MP.

Research & Development (R&D) remained a focus of the committee's work, building on our constructive engagement to address members' concerns with HMRC's compliance approach and its detrimental impact on the policy intentions of the relief. We worked with HMRC to improve standards and ensure R&D enquiries are effective at tackling error and fraud while being balanced and fair for all claimants. We have also worked with HMRC on the new merged scheme for R&D relief, which came into effect from 1 April 2024, highlighting anomalies in the legislation and seeking clarity on the rules.

Employment Taxes

The committee's work centred on engagement with HMRC. Legislation on off-payroll working and the Construction Industry Scheme (CIS) landlord / tenant payments was enacted after many years of discussions on these topics. HMRC re-established an expenses and benefits forum and this has enabled many technical queries to be discussed with HMRC.

We have engaged HMRC on the abolition of the non-domicile regime and the resulting changes to overseas workday relief, and on proposals to introduce mandatory payrolling of benefits-in-kind. In April, we published the ninth edition of our annual Employment Taxes Voice. 2024 also saw the retirement of the committee's long-serving chair, Colin Ben-Nathan, whose significant contribution to the work of the CIOT is very much appreciated.

Indirect Taxes

The committee responded to consultations on Vaping Products Duty, Alcohol Excise Duty Regulations and VAT on private school fees. We prepared Finance Bill briefings on VAT and excise legislation, VAT on private school fees, and have continued to petition for the reinstatement of commercial restitution, so that no interest is payable when there is no net loss of VAT.

We made recommendations about changes to HMRC guidance, including on the interactive VAT registration calculator. This resulted in changes to the online tool. We continued to provide input on customs guidance.

We regularly met HMRC at VAT engagement groups, where we discussed operational matters, registration, rates and simplification, land and property, and insurance. We discussed several bespoke VAT issues, including voluntary carbon credits and partial exemption. We are represented on forums for customs duty and processes and for excise. We held another successful annual inperson VAT conference.

Management of taxes

At the start of the year, we engaged with HMRC on their Tax Administration Framework Review (TAFR) call for evidence on enquiries and assessments, penalties and safeguards, and ended the year focussing on the TAFR consultation about new ways to tackle non-compliance. We are keen to see fundamental reform of tax administration.

HMRC launched several bespoke disclosure facilities, the latest being the new R&D disclosure facility. We published <u>guidance</u> for CIOT members on the processes that are now available, to help them decide which is most appropriate for their client's circumstances.

We continued to discuss HMRC's approach to nudges and prompts in One to Many (OTM) letters and, with other committees, provided comments to HMRC on 50 campaigns. In view of HMRC's increasing use of OTM 'agent' letters, we published guidance for members about how to approach this type of letter, which refers to similar errors potentially made by several different clients. We also made several recommendations to HMRC on how they could improve their OTM activity.

Digitalisation and Agent Services

Making Tax Digital for Income Tax (MTD for ITSA) continued to be a focus for the committee. We attended meetings to discuss specific areas, as well as ongoing ad-hoc engagement with HMRC's MTD team, providing feedback on draft guidance, online MTD tools and attending events.

We continue to work with HMRC on their digital services for agents through the Agent Digital Design Advisory Group. We have discussed the use of electronic signatures and measures to improve the agent registration process, which were announced in the October Budget.

We contributed to CIOT's joint report with ICAEW on HMRC's service levels, highlighting areas of improvement for legacy systems, existing digital services (particularly for agents) and future digitalisation.

Property taxes

We contributed to the development of HMRC's guidance for the CIS for landlord contributions to tenant works, and for changes to Stamp Duty Land Tax (SDLT). We proactively raised issues with HMT and HMRC concerning incorporation and Extra Statutory Concession (ESC) D32, and the operation communication plans for these. of land remediation relief. It was welcome that the government announced a future consultation on that relief at the October Budget. The subsequent Finance Bill also included provisions to level the playing field between conventional and alternative (Islamic) financing for CGT, an issue we have raised for some time. We reviewed and commented on these provisions and those abolishing the furnished holiday lettings regime.

Our business rates working group responded to consultations on removing charitable reliefs from private schools and a representative joined the Valuation Office Agency's Agent Working Group that is helping to design and deliver changes to the Scotland business rates system.

International tax

Following the introduction of the UK's top-up taxes (the first part of 'pillar two' of the twopillar solution to international tax reform), our attention turned to the backstop of these rules, the undertaxed payment rule, which will come into effect for accounting periods beginning on or after 31 December 2024. We welcome the positive engagement with HMT and HMRC to ensure these new taxes work as intended, and comply with the rules issued by the OECD's Inclusive Framework. We are supportive of the ongoing changes to the UK's top-up tax rules, because it is important that the UK's legislation aligns with the OECD position.

We began engagement with HMRC in relation to transfer pricing. We are aware that transfer pricing continues to be an important topic for businesses, who often encounter difficulties in reaching a clear and certain answer when raising queries in relation to it. We also met with HMT to discuss international tax policy, including the work at the UN towards an international tax convention. We are watching developments at the UN with interest and attended an academic workshop organised by the Saïd Business School at the University of Oxford and Potsdam University, where these issues were discussed.

Owner Managed Businesses

Throughout the year, we continued our engagement with HMRC on basis period reform, working with HMRC on the development of their G-form for overlap requests, their online calculators, and discussing HMRC's

We have been concerned about HMRC's seemingly narrow approach to 'Condition C' within the Limited Liability Partnership (LLP) salaried members rules, and have been in correspondence with them on the matter. Given the number of landlords seeking to incorporate their portfolios, the uncertainties around section 162 of the Taxation of Chargeable Gains Act 1992 and ESC D32 have also been raised with HMRC via the Capital Taxes Liaison Group. We continue to review HMRC's approach to section 459 of the Corporation Tax Act 2010 and upstream loans.

We responded to consultations including the Aggregates Tax and Devolved Taxes Administration Bill and the Delegated Powers and Law Reform Committee's inquiry into Framework legislation and Henry VIII powers (jointly with LITRG). Alongside LITRG, we provided written evidence to the Scottish Parliament's Finance and Public Administration Committee to assist with their scrutiny of the 2025-26 Scottish Budget.

In March, CIOT gave in-person evidence to the Finance and Public Administration Committee as part of its inquiry into the Scottish Aggregates and Devolved Taxes Administration Bill. CIOT also participated in a Scottish Government advisory group supporting the development of the Scottish Aggregates Tax and another looking at the development of the Scottish Building Safety Levy.

We participated in a pre-Budget roundtable with the Finance Secretary Shona Robison MSP and in several roundtables to discuss the development of Scotland's Tax Strategy, which was published alongside the Scottish Government's Budget for 2025-26 in December.

Wales

We gave evidence to the Senedd Local Government and Housing Committee on the Local Government Finance (Wales) Bill at the beginning of 2024. During the year, we responded to three Welsh Government consultations on changes to the Welsh Land Transaction Tax. These considered proposals to extend the time limit to reclaim higher rates, to abolish multiple dwellings relief and to introduce a relief for Welsh freeports.

We have participated in the development of the Welsh Visitor Levy through an engagement group set up by the Welsh Government and in discussions with the Welsh Revenue Authority as part of their discovery work on processes for introducing the levy. The Visitor Accommodation (Register and Levy) Etc. (Wales) Bill was published in November 2023 and we began our engagement around scrutiny of the Bill in 2024.

The CIOT is recognised as a key stakeholder in the Welsh Government's Welsh Tax Policy Report 2024.

Climate Change Working Group

We attended various roundtable meetings with HMRC and responded to a consultation on the UK Carbon Border Adjustment Mechanism. We met representatives from the Scottish Government's Directorate of Tax and Revenues to discuss the interaction between tax and net zero objectives and took part in a roundtable with the City of London Corporation to discuss tax and sustainable finance.

HMRC accepted our feedback that the devolved governments should take part in their joint webinar with the Department for Environment and Rural Affairs (DEFRA) on criminality in the waste industry, so that complexities with cross border transactions involving devolved environmental taxes could be addressed.

Our meetings have hosted guest speakers including HMRC policy representatives to discuss voluntary carbon credits, and the CBI on their Tax & Green Investment report.

Employee-Ownership Trusts Working Group

With the implementation of the 2023 Employee–Ownership Trust consultation proposals through Finance Bill 2024–25, we have been making representations to HMRC regarding some aspects which are causing concern. While practical issues around new consideration and trustee independence requirements remain, our response is largely positive, though there is a particular concern about the funding of trusts and their treatment as distributions by HMRC outside a narrow statutory relief. Members of the group have offered their assistance to HMRC in drafting guidance concerning these changes.

Crypto Assets Working Group

In spring, we submitted a response to the consultation on the introduction of OECD Common Reporting Standards and Cryptoasset Reporting Framework, with meetings likely to continue into 2025. Periodic meetings took place with HMRC where matters of concern to our members were discussed.

Cross Border Remote Workers Working Group

This working group was established in 2024 to consider issues relating to cross border working (both into and out of the UK). The group includes volunteers from the International Taxes, Employment Taxes, Private Client and Indirect Taxes committees. The group is identifying issues arising in practice, and we discussed these with HMT twice during the year. We are focussing on categorising the issues into those which are solvable by steps that the UK could take unilaterally, and those where a multilateral approach is required to provide clarity and/or certainty. We will continue this work into 2025.

Chair of Technical Policy and Oversight Committee

John Barnett

Director of Public Policy Ellen Milner

Head of Tax Technical Richard Wild

A voice for the unrepresented

Report from CIOT's Low Incomes Tax Reform Group (LITRG)



LITRG contributes to the CIOT's public benefit role by helping those unable to afford tax advice. This is fulfilled by providing free, comprehensive online guidance, and by working to make the tax and associated welfare systems more equitable and accessible.

In 2024, LITRG responded to 20 formal consultations (3 jointly with CIOT) and attended 428 meetings and events with HMRC, other government departments and third sector groups. LITRG has continued to build good relationships with key government departments, UK parliamentarians, the Scottish and Welsh governments and the devolved revenue authorities.

Tolley Taxation Awards

In May, LITRG won the Tolley Taxation Award for "Outstanding Contribution to Taxation by a Notfor-profit Organisation". Meredith McCammond collected the award on behalf of the LITRG team alongside Ellen Milner (CIOT Director of Public Policy) and Helen Whiteman (CIOT Chief Executive).



LITRG guidance

In 2024, there were 4.8 million visitors to LITRG's websites and 7.3 million page views.

LITRG's guidance is primarily delivered via www.litrg.org.uk. Although aimed at those unable to pay for advice, our materials are widely used by CIOT members, other professionals and third sector advisers. The House of Commons Library also signposts MPs' caseworkers to the website in its latest MP casework guide.

In February, LITRG's new website was launched with a fresh new look and improved navigation and functionality. The site is being continually developed, with additional content added and improvements planned to existing guidance pages. The website continues to receive positive feedback from users.

Our Revenuebenefits website for advisers continued to be funded by HMRC in 2024. Funding is in place until 31 March 2025.

Online Platforms

Work related to online platforms continued in 2024, building on the 2023 research project funded by the Robin Williamson Grant.

In January, LITRG was at the forefront of responding to inaccurate reporting of new rules requiring online platforms to collect and report the activity of sellers to HMRC. LITRG also worked at pace to produce accurate and helpful guidance for platform users, including a flowchart and myth-busting articles on the LITRG website.

In September, LITRG published a position paper, 'Online Platforms – the changing landscape for the self-employed', setting out how the experience of the tax system can be improved for online traders. HMRC has increased its efforts to improve public awareness of these measures in response to the report. Engagement is expected to continue in 2025.

Making Tax Digital

LITRG continues to engage with HMRC on the rollout of MTD for income tax. The Autumn Budget announcement that the threshold will reduce to £20,000 means many more unrepresented taxpayers will fall within scope. LITRG has been working with senior HMRC officials to share our insights into the programme, including the interaction between MTD and universal credit. This will continue to be a priority area for us in the year to come.



"Hello, just to say thank you for your self employment guide - it's by far the best resource I have found so far when researching what's required to launch my own business...your guide was superb in its logical process and additional links where necessary".

Quote from LITRG website user

Self assessment

LITRG continued to press HMRC for better access to paper self assessment tax returns for those unable to complete their return online. LITRG successfully persuaded HMRC to make the online version available to download without the need to telephone and request a paper form. HMRC also made the form and accompanying guidance easier to locate on GOV.UK following LITRG's suggestions.

In October, LITRG published a second position paper, 'Self assessment late filing penalties – improving fairness for unrepresented taxpayers', looking at the impact of the piecemeal introduction of the new self assessment penalty regime and the unfairness this creates for low income taxpayers.

Further work with HMRC and government

In the Spring, LITRG met with then Pensions Minister, Paul Maynard, to discuss the impact of frozen personal allowances on the state pension, and with the then Financial Secretary to the Treasury, Nigel Huddleston, on issues related to umbrella companies.

LITRG's engagement continued with the new government, including writing to the new Exchequer Secretary, James Murray, to press for a decision on options for tackling non-compliance in the umbrella company market. A Budget 2024 announcement confirming the government's favoured option followed.

We continued to share our knowledge with HMRC to help officials understand how the tax system works (and does not work) for those unable to pay for advice. This included the development of a workshop for the HMRC Stakeholder event at the end of February on compliance and a talk to HMRC's compliance staff as part of their Timeliness of Response Masterclass.

LITRG has continued its work with HMRC and other pension industry stakeholders on the implementation of the Net Pay solution for low-income pension savers. This included coordinating a roundtable meeting with HMRC and others in November 2024.

Our engagement with the Department for Work and Pensions (DWP) continued, sharing learning from our Revenuebenefits work on issues relating to the transition from tax credits to universal credit. DWP have improved their guidance as a direct result of LITRG's work.

New ways to reach taxpayers

A priority for LITRG is to better understand the needs of low income, unrepresented taxpayers and the problems they face in the tax system. The aim of this work is to get more direct feedback on our work and materials, as well as reaching more of the low income taxpayer population with our free guidance and materials.

To achieve this, we have undertaken a trial period of posting on the Money Saving Expert online forum, signposting users to LITRG material in relevant forum queries. Given how highly MSE ranks in search engine results, this is a good way of targeting LITRG's materials. The trial has also provided very rich insight into areas of the tax system where unrepresented taxpayers are unable to easily find the answer they need on GOV.UK. This will inform LITRG's work in the future.

Media

LITRG's media presence strengthened in 2024, with 81 mentions in the mainstream media. Topics on which our comments were carried by the media included the gig economy, HMRC service levels, paper tax returns, Child Trust Funds and self assessment. As a result of a more targeted approach to media engagement, LITRG has increased its coverage levels compared with previous years and we hope to continue this momentum in 2025.

Thank you

After many years with LITRG, Kelly Sizer left her role as Senior Manager at the end of October to pursue a new challenge in CIOT's education team as Head of Qualifications Development. LITRG Technical Officer Antonia Stokes has taken over as Senior Manager. Everyone in the LITRG team wishes Kelly well in her new role.

Director of Public Policy

Ellen Milner

Head of LITRG

Victoria Todd

Senior Manager

Kelly Sizer (until 31 October 2024) Antonia Stokes (from 1 November 2024)

Promoting understanding of tax

External Relations report

The Institute's objectives include creating "a well informed public opinion on taxation". To achieve this, we inform public debate via the media, directly publish information for taxpayers, engage with politicians and other policy makers, and promote forums for discussion of tax policy.

CIOT in the media

CIOT and LITRG featured 308 times in the mainstream media in 2024, in addition to hundreds of mentions in the tax and accountancy trade press.

Through the year CIOT was covered on topics including:

- HMRC service levels (Daily Telegraph, Daily Mail, The Times).
- Scottish tax divergence (The Herald, Scottish Daily Express, The Times).
- The future of Making Tax Digital (Daily Telegraph, Financial Times).
- Pre and post-Budget analysis, including the impact of frozen thresholds and plans to impose 20% VAT on private school fees (Daily Telegraph, The Times, Daily Mail).
- Extra funding to tackle tax evasion and avoidance (Financial Times).
- Capital Gains Tax (CGT) (Times Radio, Financial Times).
- An opinion piece by CIOT President Charlotte Barbour on improving the efficiency of the tax system (Financial Times).
- Inheritance Tax reforms (Financial Times).

LITRG contributed to stories and articles on topics including:

- New reporting rules for online marketplaces (LBC, Channel 4 News, Financial Times).
- Tax on pensions (BBC Radio 4).
- High Income Child Benefit Charge (The
- The single-person council tax discount (The Times).

Informing debate, influencing policy

CIOT and LITRG continued to influence legislation and debate on tax during 2024. We were cited or otherwise mentioned on 141 occasions in parliamentary debates and reports during the course of the year. Highlights included:

- Finance Act 2024 contained a number of measures which we had argued for, including making full expensing permanent, relaxations to the cash basis and changes to off-payroll working rules.
- Our evidence to a House of Lords inquiry on R&D relief and other measures in that Bill was cited in 38 places in the final report.
- Our evidence on the damaging impact of poor service levels was quoted in a hard-hitting Public Accounts Committee report on HMRC performance.
- Debate on Finance (No.2) Act 2024 saw CIOT evidence cited on topics including the high income child benefit charge, economic crime levy and transfer of assets abroad legislation.
- Close engagement with the new government on non-doms which led to improvements to the proposals, especially in relation to the temporary repatriation facility.
- The incoming government adopting a number of our recommendations for improvements to the tax policy process, including a single annual fiscal event and greater use of roadmaps.
- Finance Bill 2024-25 amended to broaden the scope of CGT reliefs in relation to employeeownership trusts, which the minister told the committee had been done in response to CIOT representations.



"I pay thanks...to outside organisations, including the Chartered Institute of Taxation in particular, for all their help not just with this Finance Bill, but with all six Finance Bills for which I have been responsible as a shadow minister."

James Murray MP (then Shadow Financial Secretary - House of Commons, May 2024)

"We very much appreciate the input that we have received from stakeholders and interested parties, including the Chartered Institute of Taxation."

Nigel Huddleston MP (Financial Secretary to the Treasury - House of Commons, May 2024)



Engaging with policy-makers

We continue to work with politicians of all parties in pursuit of better informed tax policymaking. In 2024, we engaged with more than 50 politicians across the UK's parliaments, including:

- Briefing sessions for opposition parties on the year's Finance Bills, for Labour before the election and Conservatives in the autumn.
- Letters sent to main party spokespeople identifying key tax system issues at the start of the election campaign. Substantive replies received from Lib Dems, Greens and DUP during the campaign; engagement with Labour and Conservatives on these issues since election day.
- Meeting new Exchequer Secretary James Murray to discuss tax administration and the corporate tax roadmap, among other issues.
- Attendance at Labour, Conservative and Lib Dem party conferences in the autumn, meeting with politicians including new Treasury Committee chair Dame Meg Hillier and Conservative leadership contender Robert Jenrick.
- A programme of meetings with new MPs with an interest in tax. finance or economics to introduce the Institute to them.
- Lord Craig Mackinlay CTA recognised with an extraordinary award at the autumn Joint Presidents' Reception.

Online Information

We continue to publish thought-provoking and informative blogs on the CIOT website. In 2024, we published 116 blogs, including guest blogs on topics ranging from Welsh taxes to employee ownership. During the election campaign we published weekly updates on tax discussion as well as summaries of the tax policies in each party's manifesto.

Also during the campaign we published eight written explainers on topical issues, ranging from capital gains tax to placing VAT on school fees. Four of them were accompanied by video explainers. The written explainers were viewed more than 30,000 times during the year, while the videos have been watched more than 1,000 times on YouTube. We produced three further explainers around the Autumn Budget and these have had more than 38.000 views between them.

CIOT in Scotland

CIOT continues to be an important media and political stakeholder in Scotland, with 131 mentions in the Scottish press in 2024 and 16 journalists engaged with over the course of the year.

While much of the focus was on the implications for Scottish taxpayers of the Scottish and UK budgets, CIOT and LITRG were contacted over the course of 2024 for help with reporting on topics including the devolution of National Insurance and Council Tax reform.

Politicians from across the Scottish Parliament cited examples of our written and oral evidence during their scrutiny of legislation introducing the new Aggregates Tax and Transient Visitor Levy.

CIOT in Wales



In January Lakshmi Narain gave evidence for CIOT at a hearing on the Local Government (Wales) Bill, which reforms business rates and council tax. This was followed by CIOT being cited extensively in two Senedd reports on the Bill, particularly in relation to our criticism of the wide powers being granted to ministers to make future changes through secondary legislation.

We were pleased to welcome new Finance Secretary - and former First Minister - Mark Drakeford to our Cardiff lunch in November (pictured). Two members of the Senedd Finance Committee, including the chair, also joined us.

Director of Public Policy Ellen Milner

Head of External Relations George Crozier

Promoting excellence in tax education

Report from the Education Committee

The Education Committee ensures that the educational aims of the Institute remain relevant and maintains a focus on the future development of the tax profession.

In addition to providing support and encouragement for students, the committee is responsible for promoting the study and understanding of tax for the benefit of the public.

By the end of 2024, 4,604 students were registered for the CTA qualification. This includes those participating in joint programmes with the Institute of Chartered Accountants in England and Wales (ICAEW), via the ACA-CTA route, and the Institute of Chartered Accountants of Scotland (ICAS), through the CA-CTA route. We have been pleased to see continuing numbers of students achieve CIOT membership via these programmes. An additional 2,911 students are registered for the Tax Pathway, the joint ATT-CTA route to qualification.

The Education Committee has responsibility for the ADIT Sub-Committee, the Grants Sub-Committee and the Fellowship Sub-Committee.

At the end of May, Roz Baxter stepped down as Director of Education. Roz remains with us as Director of Governance and we are very grateful for her nearly 23 years leading the education team.

CTA Exam Skills and Focus Webinars in 2024

Five webinars were held for students taking part in each of the spring and autumn exam sessions. These sessions are the most direct way the Institute supports its CTA students.

To make them as widely accessible and affordable as possible, these webinars are offered at a low price, not least to support those who are selfstudying and therefore not financially supported by their employer. The feedback from those attending remains positive and the Institute is grateful for the excellent tutors who teach the students.

Fellowship

Four people successfully presented a body of work and one person a dissertation, to the high standard required to achieve Fellowship. 12 people had their Fellowship synopses approved. Four of these candidates were Direct Fellowship applicants and eight are existing CTA Associates.

Dr Stephen Daly was presented with a Fellowship Medal for his submission titled 'Tax, Authority, Advice and the Public', this having been considered an outstanding piece of work.

The Fellowship routes were promoted in Tax Adviser magazine with the aim of encouraging increased numbers of applicants.

Journal of Tax Administration

The committee has responsibility for monitoring the Institute's involvement in the future development of the Journal of Tax Administration (JOTA) which is funded by CIOT. JOTA's new website, supported by CIOT funding, was launched in 2024. It can be found at www.jota.website.

Grants

The committee approved two grants in 2024. The first was for an academic workshop held at the Saïd Business School at Oxford University in March, which considered the UN resolution on the promotion of inclusive and effective international tax cooperation. The second was for the annual Tax Research Network conference, which took place at the Cardiff Business School in September.

Advanced Diploma in International Taxation (ADIT)

ADIT was represented at two major CIOT events. The 17th CIOT/ADIT/IFA Young International Corporate Tax Practitioners' Conference took place in London on 26 September, attracting 78 delegates. The 25th CIOT/ATT/ADIT/IFA Cross Atlantic and European Tax Symposium took place in London on 14 November. 56 delegates attended.

The fifth ADIT International Tax Webinar series took place between April and October 2024. Six webinars were delivered and these attracted a total of 1,742 delegates.

Nine ADIT Network Webinars and two in-person Network Events were delivered, focusing on international tax topics of specific interest to ADIT audiences in the countries and regions represented by ADIT Champions. These free events help to grow the ADIT community in the countries and regions in which ADIT Champions operate. Each event is promoted to local ADIT students and holders, as well as tax professionals at the Big Four, multinationals and other major employers.

ADIT exhibited at the 76th IFA Annual Congress in Cape Town from 27 to 31 October. Approximately 1,200 senior international tax professionals and academics attended the event, representing firms, governments and universities around the world.

The Congress represented an ideal opportunity for the ADIT team to promote the new ADIT South Africa module, which was launched at the beginning of October and for which the first exam will take place in June 2025.

In-person and virtual ADIT awards ceremonies took place on 26 September and 28 November respectively. These were presented by Chief Operating Officer Andrew Burnett and ADIT Academic Board chair Jim Robertson, and included a speech from CIOT President Charlotte Barbour. A total of 76 ADIT award winners, graduates and Affiliates participated, and the virtual event included a networking session led by members of the ADIT Sub-Committee and ADIT Champions from around the world.

2024 saw the 20th anniversary of the first ADIT exams, and the occasion was marked with a special communications campaign, featuring notable ADIT milestones and testimonials from former ADIT students.

The CIOT has taken the strategic decision to restrict the number of countries in which ADIT is offered. From 1 January 2025, access to the ADIT qualification is being maintained for new students in approximately 70 countries and territories, including all major existing ADIT markets, accounting for approximately 95% of the current ADIT student population. Existing ADIT students who were registered before 1 January 2025 and are not based in an eligible country will be allowed to sit their remaining exams in order to complete the qualification.

Chair of Education Committee Jane Frecknall-Hughes

Director of Education Vicky Purtill

Head of Qualifications Development Kelly Sizer (from November 2024)

Diploma in Tax Technology

The Diploma in Tax Technology (DITT) continues to be popular. 309 new candidates registered in 2024 and 173 candidates completed the qualification. It means that 259 candidates have achieved the DITT qualification since its launch in 2022.

The DITT Committee overseeing the qualification met twice in 2024 under the chairmanship of Paul Aplin. The first annual DITT syllabus update was completed in April 2024. This was led by the DITT Committee in consultation with tuition material providers Coefficient and Tolley. Several large employers have implemented putting structured cohorts of employees through the programme and have provided encouraging feedback on their experiences. This will guide future development of the qualification.

A 'DITT Talk' podcast series was launched in September 2024 as part of the qualification's business development strategy. This was hosted by DITT Committee and Council member Shan Sun, and featured guest speakers with expertise in tax technology.

An online short course on AI called 'AI for Tax' launched in December 2024 with the aim of introducing and encouraging progression onto the DITT qualification. Materials for AI for Tax have been produced by Coefficient, under the DITT Committee's governance, and the course is delivered via Tolley's online learning platform.

Examinations report

Report from the Examination Committee

A CTA is regarded as having achieved the premier tax qualification, having passed exams that require candidates to demonstrate a breadth and depth of technical expertise and an ability to apply that to practical situations.

The primary objective of the Examinations Committee is the supervision of the administration arrangements for the CTA examinations and the review of the examination format and results in line with Council requirements. This ensures exams are set to the correct standard, are conducted in an environment that ensures fairness, and demonstrate the quality of the education provided. We are grateful to our examiners, committee members and staff for all their hard work in what is a huge administrative and intellectual exercise.

In 2024, 3,793 CTA exams were taken across the May and November exam sessions and 614 students successfully completed the exam requirements for membership of CIOT.

This includes those on the CTA Direct Route, the ATT CTA Tax Pathway, the ACA CTA Joint Programme, the CA CTA Joint Programme, and via the Advanced Diploma in International Taxation (ADIT) route. The Committee hopes that the successful candidates will go on to play an active role in the future of the CIOT, volunteering for whichever area of the Institute's work interests them most.

How the exams were offered in 2024

The same exam software was used and preloaded onto devices at test centres. Exams were invigilated by test centre staff and candidates had access to their own pre-purchased exam permitted tax legislation with online search facilities, providing a consistent environment for all candidates.

The test centres are able to accommodate the vast majority of candidates who require additional time for their exams or who have alternative arrangements. Work continues with the test centres before each exam session to ensure the candidates have the best possible exam experience.

Computer Based Examinations on demand

In addition to our twice-yearly taxation exam sessions, CTA candidates are also examined via Computer Based Examinations (CBEs) on Principles of Accounting, Law, and Professional Responsibilities & Ethics. These examinations are available year-round at test centres across the UK. Students not wishing to sit in a test centre can sit these exams in a suitable location of their choice using a remote invigilation package and with a live invigilator. This remote option gives students choice, increases accessibility and reduces travel time. The latest edition of the law manual (7th edition) will become examinable from 1 March 2025.

CTA qualification review

In late 2023, Council requested a comprehensive review of the CTA qualification to ensure it continues to meet the needs of candidates, employers, the tax profession and other stakeholders.

Overseen by the Examinations Committee, the CTA Qualification Review Working Party (the working party) was established in early 2024 to review the existing qualification and to identify, develop and recommend appropriate changes to the CTA qualification. The working party met on six occasions during 2024 and made its initial recommendations to the Examinations Committee for consideration in September. In October, these were reviewed and approved by Council.

The proposals considered included the development of a professional skills and competency statement and three alternative structures for the future CTA qualification journey.

Council approved the proposed next steps for the CTA qualification development work and the next phase of the project has begun, with a working party set up to design the syllabus for the new qualification structure.

The next phase of its development will include seeking and implementing stakeholder feedback on the proposals, including a public consultation that is scheduled to begin in mid-2025.

This work is expected to conclude by the end of 2025, after which a further period of time will be needed to communicate changes to all relevant stakeholders and for these to take effect. Regular progress reports will be provided to Council by the Examinations Committee throughout 2025.

ATT CTA Tax Pathway

172 students qualified via the ATT CTA Tax Pathway. This route enables students to study for both the ATT and CTA qualifications and become members of both bodies in less time, without reducing the quality and rigour of the qualifications. Students are able to transfer onto the ATT CTA Tax Pathway from traditional CTA and ATT routes, provided they meet the requirements.

ICAEW/ICAS Joint Programmes

163 students successfully completed the ACA CTA and CA CTA Joint Programmes. This includes 54 who completed the qualification via one of the two permitted ADIT exam papers for Joint Programme students.

Level 7 Apprenticeship

57 apprentices successfully completed all elements of the End-Point Assessment (the Project Report and the Application and Professional Skills exam), achieving their Level 7 Apprenticeship in Tax.

ADIT

Approximately 3,850 students from around 120 countries are currently pursuing our ADIT qualification. 2,210 individuals have now achieved the qualification, 437 of whom have subscribed as International Tax Affiliates.

2024 saw around 800 new students registering for the ADIT qualification. Online exams took place in June and December 2024. Approximately 2,250 exam entries were received for the two exam sessions, and students sat these in their homes and offices across 74 countries.

Chair of Examination Committee Jo Bello

Director of Education Vicky Purtill

Education and Examinations Manager Jude Maidment

Prize winners

CTA and ADIT medal and prize winners

Our congratulations to those students who successfully achieved a qualification with us in 2024, including our medal and prize winners.



Pictured from left to right are: Front row: Luca Parrott, Luke Butterworth, Zoe Dixon, Charlotte Barbour, (CIOT President), Charlotte Buckley, Callum Shaw and Isobel Prince.

Back Row: Samuel Westlake, Joseph Kynman, Robert Gray, Samuel Davis, George Wilbraham, Karolina Niziolek, Michael Blackwell (Fellowship medal recipient), Nathan Webb, Sam Talbot, Rachel Jackson, Aaron Norman, Andrew Mouland and Namdeep Singh.

May 2024 CTA examinations

Jessica Heinen, Institute Medal; Luke Butterworth, Gilbert Burr Medal; Aaron Norman, Victor Durkacz Medal; Andrew Mouland, Spofforth Medal; Isabel Prince, John Beattie Medal; Zoe Dixon, Ronald Ison Medal and Croner-i Prize; Sam Talbot, John Tiley Medal; Thomas Yarwood, Wreford Voge Medal; Namdeep Singh, Ian Walker Medal; Joseph Kynman and Zoe Dixon, Avery Jones Medal; Luca Parrott, Chris Jones Prize.

November 2024 CTA examinations

Abdurrahman Nurgat, Institute Medal; Nathan Webb, Gilbert Burr Medal; Robert Gray, Victor Durkacz Medal; Charlotte Buckley, Spofforth Medal and Croner-i Prize; Samuel Westlake, John Beattie Medal; Joseph Fletcher, Ronald Ison Medal; Karolina Niziolek, John Tiley Medal; Samuel Davis, Wreford Voge Medal; Rachel Jackson, Ian Walker Medal; Callum Shaw, Avery Jones Medal; George Wilbraham, Chris Jones Prize.



June 2024 ADIT examinations

Eoghan Murphy, Heather Self Medal; Sharnjit Brach, Raymond Kelly Medal; Kai Ho Lam, Worshipful Company of Tax Advisers Prize; Ioannis Kekeris, Tom O'Shea Prize; Tiphaine Lemaire, IVA Prize; Clarence Frank, Croner-i Prize; Shahinoor Khanum, Wood Mackenzie Prize.

December 2024 ADIT examinations

Elinor Appleyard, Heather Self Medal; Tom Henderson, Raymond Kelly Medal; Jennifer Osborne, Tom O'Shea Prize; Adriana Stefanova, IVA Prize; Daniel Brown, Croner-i Prize; Tahir Kapadia, Wood Mackenzie Prize.

Medals and Prizes for Outstanding Performance

CTA medals/awards are awarded for the following: Institute Medal for the candidate who has completed the CTA qualification by achieving first time passes in all required tax exams, regardless of route sat, and having achieved the best overall performance (exams could be taken at one or more exam sessions). Gilbert Burr Medal for the highest mark in the Taxation of Owner-Managed Businesses Advanced Technical Paper (ATP). Victor Durkacz Medal for the highest mark in the Domestic Indirect Taxation ATP. Spofforth Medal for the highest mark in the Inheritance Tax, Trusts & Estates ATP. John Beattie Medal for the highest mark in the Human Capital Taxes ATP. Ronald Ison Medal for the highest mark in the Taxation of Individuals ATP. John Tiley Medal for the highest mark in the Taxation of Larger Companies and Groups ATP. Wreford Voge Medal for the highest mark in the Cross-Border Indirect Taxation ATP. Ian Walker Medal for the highest mark in the Awareness Paper. Avery Jones Medal for the best performance in the Application and Professional Skills Paper. Chris Jones Prize for the highest total marks in two ATPs (taken at the same sitting). Croner-I Prize for the candidate with the highest distinction mark in an ATP.

ADIT medals/awards are awarded for the following: Heather Self Medal for best overall performance in Module 1 Principles of International Taxation. Raymond Kelly Medal for best overall performance in Module 2.09 United Kingdom option. Tom O'Shea Prize for best overall performance in Module 3.01 EU Direct Tax option. Croner-i Prize for best overall performance in Module 3.03 Transfer Pricing option. Worshipful Company of Tax Advisers Medal for highest mark in Module 2 (all other options), Wood Mackenzie Prize for best overall performance in Module 3.04 Energy Resources option. IVA Prize for best overall performance in Module 3.02 EU VAT option.

Membership and branches

Report from the Membership and Branches Committee and the Branch network

The branch network helps CIOT achieve its charitable aims by providing access to continuous professional development opportunities, sharing best practice and helping to enhance the tax profession.

Celebrating our 20,000th member



The Institute reached a significant membership milestone in February when we welcomed our 20,000th member, Rachael Brown, who completed both ATT and CTA qualifications. When interviewed for Tax Adviser magazine, Rachael emphasised her sense of achievement and pride in obtaining the qualification.

Membership

The Institute's total membership at the end of 2024 was 20,193, up from 19,924 at the end of 2023. We were delighted to welcome 688 new members over • the course of the year (2023: 699).

91% of qualified students join within two years of successfully passing their CTA exams (2023: 90%). We continue to enjoy the benefits of an enviable membership retention rate, which reached 97% in 2024 (2023: 96%).

38 members reached their 50-year membership milestone. We also recognised members reaching their 10th, 25th and 60th anniversaries with certificates, and an email was sent to 5 year members to encourage and build on engagement.

573 members are now registered to use the CTA Practicemark.

We were delighted to welcome new members to two ceremonies that took place in the magnificent Drapers' Hall in the City of London (one in the afternoon and one in the evening) on 14 March. The events were attended by 194 new Associates, 11 prize winners, four 50-year members, three Fellows, two Past Council Members, and one 60-year member, along with their guests.

Branch Network

The Branch Network is supported by over 200 volunteers, many of whom are CIOT members or students. This includes the 13 new branch committee members who joined over the course of the year. 43 of our members hold a chair or officer role within their branch.

We would like to extend our thanks to the branch volunteers who have supported the network for a number of years and have decided to step down. In some cases, this has been to take up other roles within the Institute, and in others to make way for new volunteers in the interests of good governance and succession.

Branch volunteers met twice online and once in-person to discuss 'Building the profile of your branch'. This included the exploration of strategies to enhance engagement and consideration of the types of events that might increase attendance.

The Branch Network delivered a total of 120 events in 2024, covering a broad range of topics including:

- Associated companies how to navigate your way through the rules.
- Introduction to international corporate tax
- How to handle national minimum wage reviews.
- Managed service company legislation explained: insights on key risks and HMRC's interpretation.
- Trust registration service update.
- UK tax and essentials for influencers and their advisers.

We have brought local communities together with more in-person events across the network. 70 CPD and social events were held in 2024 (2023: 38). This has led to a pleasing increase in registrations, which included 970 CIOT members (2023: 554) and 230 CIOT students (2023: 115).



"I chose to take the CIOT/ATT route early on in my career and this meant that I was studying for ATT while juggling a three-year-old and a full-time job. I passed with a distinction in personal tax and gained a promotion at work, which was definitely a highlight! Completing my CTA feels like the culmination of a journey."

Rachael Brown, CIOT's 20,000th member

These events were well received, with attendees commenting on the high quality of the speakers and the benefits of seeing people in person and the networking opportunities this brings.

Attendance at our virtual events has remained high, with 6,100 member registrations in 2024 (2023: 4,225) and 1,070 student registrations in 2024 (2023: 800). There has been a reduction in the number of online events, with 45 held in 2024 (2023: 51), as a result of our strategic focus on driving engagement through in-person events. However, that is unlikely to account for the entire reduction and perhaps topics and timings will need to be revisited as we aim to continue to engage members and students in 2025.

Thank you to all volunteers for their hard work throughout the year to provide their local communities, which include our members and students, with relevant CPD and networking opportunities.

And our thanks too to all the volunteers who work to bring members, students and the public together in the furtherance of education in taxation.

Chair of Membership and Branches Committee Sarah Hewson

Chair of Branch Network Lynn Poyser

Head of Member Services Emma Barklamb

Membership milestones



1930

The Institute of Taxation is established on 5 December 1930. It has 12 founding members.

1934

Membership reaches 384, comprising 242 fellows and 143 associate members.

1942

By 1942, the Institute welcomes its 1,000th member.

1965

By 1965, there are over 5,000 members, as applicants rush to beat a deadline requiring all future members to have passed the Institute's own exams.

1979

It takes until the end of the decade to reach the 6,000 member mark, as the introduction of new intermediate exams leads to a temporary fall in membership.

1988

7,500 people now call themselves members of the Institute.

1996

Membership hits five figures as the (now) Chartered Institute of Taxation reaches its 10,000th -member milestone.

2010

The start of a new decade sees CIOT reach 15,000 members. There is a big jump (to nearly 17,000) when CIOT merges with the Institute of Indirect Tax.

2024

Rachael Brown becomes the 20,000th member of CIOT. By the end of the year, we have 20,193 members.

(Source: https://www.tax.org.uk/our-history)

Upholding professional standards

Report from the joint CIOT/ATT Professional Standards Committee

Members are expected to adhere to high professional standards to maintain trust in the profession. The committee considered several important issues during the year to set appropriate standards and review and monitor adherence to these.

Professional Indemnity Insurance (PII) and Continuing Professional Development (CPD)

There were no further updates to the regulations in 2024. We liaised with insurance providers to monitor market conditions for obtaining insurance and have been monitoring whether updates to ICAEW PII requirements will impact CIOT members. The CPD working party continued to keep the regulations under review and looked at how Professional Standards training can be provided in an effective way for use by all members.

Member support

We provide support to members through standards@tax.org.uk. Queries in 2024 covered issues including PII, CPD requirements, client handovers and reporting suspicious activity.

Raising standards

We responded to HMRC's consultation on raising standards in the tax advice market, surveying members for their opinions on the points raised.

Our response indicated support for mandatory registration and it is pleasing to see that HMRC plan to move forward with this. In principle, we also supported mandatory membership of a recognised professional body as the most appropriate way for regulating the tax services market. However, we felt that there were many elements requiring further consideration and consultation.

Following work with HMRC in 2023, the updated Standard for Agents was published. CIOT was involved with the group tasked by the Professional Conduct in Relation to Taxation author bodies to meet with HMRC and agree the updated wording.

Professional Conduct in Relation to Taxation (PCRT) members are compliant with our rules.

PCRT was kept under review, largely because of the work of the International Ethics Standards Board for Accountants on an ethical tax planning framework.

Work also progressed on updating topical guidance on the application of professional standards to the provision of research & development tax credit services. We expect the updated guidance to be available in 2025.

Making Tax Digital for Income Tax and the use of Artificial Intelligence are also areas where members seek guidance on applying PCRT. Working groups have been set up to look at both areas.

CFE Tax Advisers Europe

In September, CIOT participated in a panel discussion at the annual CFE Professional Affairs Committee conference in Ljubljana. The focus of the session was on the new European Anti-Money Laundering Authority, with CIOT invited to provide insights on its experiences with the Office of Professional Body AML Supervision (OPBAS).

Compliance

The CIOT does not simply set standards but must also monitor compliance and follow up where noncompliance is identified. This includes issuing fines and making referrals to the Taxation Disciplinary Board (TDB) where appropriate.

With TDB operations moving in-house from 1 September 2023, we have seen much closer liaison between the Professional Standards and TDB teams. TDB regulation changes from 1 January 2024 means administrative fines are now handled by the Professional Standards Team, freeing time for the TDB operations team to concentrate on cases involving the Investigation Committee.

Annual Return

The Annual Return is a key element of member compliance. They must self-certify compliance with CPD, PII and Anti-Money Laundering (AML) obligations and respond to conduct questions including criminal convictions and disciplinary action by another professional body. Members failing to complete a return risk TDB referral and we have stepped up enforcement activity, including issuing fines for non-submission.

With the regulation of the tax profession in the spotlight, it is vital we are able to ensure our

The annual check of a selection of CPD records indicated a high level of compliance with this membership requirement.

Chair of Joint Professional Standards Committee Tracy Easman

Director of Public Policy Ellen Milner

Head of Professional Standards Iane Mellor

Anti-money laundering

Anti-money laundering report

All businesses in the UK tax and accounting sector must be supervised for Anti-Money Laundering (AML) purposes by an approved supervisory body. One of the objectives of CIOT is to "prevent crime" and effective AML supervision is an important tool in the fight against financial crime and the protection of the public.

AML supervision

At 31 December 2024, CIOT supervised over 850 firms. These are firms where at least one principal is a CIOT member, either as a sole proprietor, an equity partner, an LLP member or a company director.

Firms must apply for supervision and undergo checks before being accepted. They are required to renew their status annually by submitting a detailed return form including questions relating to compliance with the latest money laundering regulations (MLR). Non-compliance is followed up and dealt with accordingly.

As AML supervisors, it is our responsibility to ensure that firms run by our members:

- Understand the anti-money laundering, counter terrorist financing and counter proliferation financing risks facing their business and how to mitigate them.
- Comply with their anti-money laundering, counter terrorist financing and counter proliferation financing obligations.

AML inspection visits

45 firms were subject to AML inspection in 2024. In accordance with the MLR, all our supervised firms are given a risk rating. The National Risk Assessment states that the legal, accountancy and tax advisory professions are considered 'high risk' for the purposes of AML. Despite this, a majority of our firms are considered to be low or medium risk.

Firms assessed as high risk and those with a higher medium risk profile are included in our programme of visits, along with a small sample deemed medium and low risk. These visits cover firms of varying sizes and the programme is flexible, with visits added as new risks are identified, for example, where firms are late to register or indicate noncompliance in their AML renewal forms.

Following visits, we are able to rate firms as compliant, generally compliant or non-compliant. In 2024, five firms were found to be compliant, 20 generally compliant and 20 non-compliant. Action points and deadlines are set for firms found to be generally compliant or non-compliant. We work with them to ensure compliance. Ongoing noncompliance is referred to the TDB.

Enforcement

Members have historically been referred to the TDB for failure to complete renewal forms and fines subsequently issued. Following regulation changes, the Professional Standards team are able to issue these. 13 CIOT members were issued with fines in 2024. We have taken a firmer line on noncompliance in other areas, referring six members to the TDB for initial late AML supervision registration and failure to deal with AML requirements.

Communication

AML issues were communicated to members via AML newsletters, the weekly news email and Tax Adviser magazine. Two webinars in April and November covered AML issues, the latter including guidance on Companies House changes. We also provided training as part of the TDB training day.

We are required to report our activities as an AML supervisor under the MLR to HM Treasury. Our latest annual report provides more information on our supervisory activities in 2023-24.

Office for Professional Body Anti-Money Laundering Supervision

We continue to engage with other AML supervisors, HM Treasury and OPBAS to meet our statutory requirements as supervisors. We also actively take part in information sharing on financial crime threats and risks.

We are accountable to OPBAS for the standard of our supervision and were inspected in February. The action points identified are being progressed and updates provided to OPBAS. Overall, they were encouraging in relation to the effectiveness of our supervisory activity.

We have still to hear from HM Treasury following the 2023 consultation on reform of the anti-money laundering and counter-terrorism financing supervisory system. No consultation response was published during the year and we await further developments in this area.

Chair of Joint Professional Standards Committee Tracy Easman

Director of Public Policy Ellen Milner

Head of Professional Standards Iane Mellor

Enforcement of standards

Taxation Disciplinary Board report

The Taxation Disciplinary Board (TDB) is an independent body which handles complaints about alleged breaches of professional rules and conduct by members and students of CIOT and ATT.

The TDB is responsible for administering the Taxation Disciplinary Scheme (TDS), which sets out the principles and powers underlying the participant bodies' complaints and disciplinary procedures. These procedures exist to protect the public. By maintaining and enhancing professional standards they also strengthen the standing and reputation of the tax profession and are beneficial to all members. The TDB aims to ensure it is at the forefront of best regulatory practice and is committed to an open and effective system of complaints handling and disciplinary tribunals.

For the purposes of the figures in this report, students are counted as members.

Governance of the TDB

Overall responsibility for the administration of the TDS lies with the TDB Board of Directors. Susan Humble was Chair until February 2024, when her term of office came to an end. Tom Hayhoe was appointed in her place. Tom has a wealth of experience across a broad range of private, public and third sector roles, including at the College of Policing, Nursing and Midwifery Council, ACCA and various NHS bodies. He is currently the Covid Counter-Fraud Commissioner at HM Treasury and also chairs the Legal Services Consumer Panel. He has chaired and been a member of many professional regulatory boards and panels.

The chair is currently supported by three directors: Daniel Lyons appointed by CIOT, Brian Palmer appointed by ATT and Jane Brothwood, an independent Non-Executive Director who joined in February 2024.

The committees and tribunals appointed by the TDB are drawn from a panel of legally qualified professionals, tax professionals, and lay persons. Panel members do not have any current involvement with the standards setting of the two participant bodies.

Complaints are managed by the TDB Operations Team within a firewalled area of CIOT/ATT Professional Standards, under the oversight of the Head of Professional Standards.

The Board employs a part time Executive and Strategy Officer, who supports the board and panel members, working on policy and strategy and fulfilling the company secretary's duties. The Board is also recruiting a part-time assistant.

The Clerk to the Disciplinary Tribunal is responsible for the organisation and conduct of disciplinary hearings.

Developments in 2024

On 1 January 2024, new Taxation Disciplinary Scheme Regulations were introduced. These have been reviewed thoroughly and reflect the move of case management to within CIOT/ATT Professional Standards.

The regulations seek to improve the administration of complaints with, for example, the introduction of consent orders and service by email. Fines for administrative breaches are now administered by professional standards with referrals to TDB for non-payment.

The investigation of complaints, including the function of 'reviewer', and day-to-day administration, is undertaken by two case managers within the TDB Operations Team.

TDB have continued to operate remotely with some in-person meetings at the office in Monck Street. Hearings are generally held virtually, with some Disciplinary Tribunal hearings held in person in Monck Street.

A successful training day was held in November 2024 with most attendees attending in-person and some joining virtually. It was a wonderful opportunity to come together again, to learn and share good practice. Presentations were received from Sarah Ellson, Partner at Fieldfisher solicitors, on recent case law, safeguarding and whistleblowing, and discussions held on the new consent order procedure and recently updated Indicative Sanctions Guidance (ISG).

The ISG was updated in October to reflect the changes in the updated regulations and following a benchmarking exercise to recommend appropriate levels of fines, as the current levels were below those felt appropriate by similar professional regulators. The updated guidance comes into effect from 1 January 2025.

Jane Mellor, Head of Professional Standards at CIOT/ATT, presented on a range of standards topics including the approach to Anti-Money Laundering requirements.

Complaint cases received in 2024

TDB still has a backlog of cases, but good progress is being made working through these. While there were some initial teething issues with the use of consent orders, these have proved to be useful in speeding up the resolution of cases and reducing costs for members.

The TDB received 70 referrals in 2024 and were put on notice of three potential referrals depending on the outcome of criminal proceedings (two of these cases relate to CIOT members). Of the 70 cases, 11 referrals were made by CIOT (or CIOT and ATT for joint members) and a further four were made by ATT only. One ADIT Affiliate was included with the CIOT figures. The remainder of the referrals were made by other professional bodies, government, clients, members of the public and an investigative think-tank.

There are 47 cases still at the Pre-Investigation Committee stage, of which 37 relate to CIOT members. 11 out of the 47 cases involve CIOT members where we are awaiting outcomes from other regulatory bodies. Those 11 cases cannot be progressed pending conclusion of the other investigations/proceedings.

Of the cases received in 2024, 14 have concluded, eight of which related to CIOT members (or joint CIOT and ATT members). One was concluded at the Disciplinary Tribunal, with the member suspended and subject to a costs order. Two were concluded at the Investigation Committee by consent order for censure and costs. Three complaints against CIOT members were closed because insufficient evidence was provided by the complainant, and two were closed because, following conclusion of another case, the individual was no longer a member. Of the 14 closed cases, another two related to individuals who were not within TDB jurisdiction as they were found to not be members.

Two cases have been through the Investigation Committee and the consent order offers are with the member for consideration (one of these relates to a CIOT member).

Three CIOT members have been referred to Disciplinary Tribunal and are awaiting hearings, and four have been referred for a decision of the Investigation Committee (three of which relate to a CIOT member).

There were nine AML related complaints during 2024, six of which related to CIOT members.

Disciplinary hearings and outcomes in 2024

The Disciplinary hearings listed in 2024 included referrals made during 2024 and in previous years.

Cases involving 22 CIOT members came before the Investigation Committee (IC) during 2024 (one member had two IC cases during the year). Nine CIOT members were referred to the Disciplinary Tribunal, two of which were referred for a hearing before the Interim Orders Panel. In four cases it was deemed there was no prima facie case or no sanction required. Five cases have been settled by way of agreement with the member through a consent order. We await the agreement of two members in relation to consent orders. One member would not accept a consent order and went to the Disciplinary Tribunal. In another case, the Investigation Committee has requested additional evidence.

During 2024 the Interim Orders Panel met three times and two CIOT members were suspended pending the outcome of disciplinary proceedings.

13 CIOT members came before the Disciplinary Tribunal during 2024. All members were charged costs. Seven were censured and one was issued with a warning. Four were expelled and one of these members was also required to pay compensation.

For some members, more than one case was heard by the Investigation Committee or Disciplinary Tribunal, and in some cases, Investigation Committee panel members had to meet more than once to discuss the case, particularly in relation to the agreement of consent order terms.

Chair of Taxation Disciplinary Board Tom Hayhoe

Managing our resources

Finance Committee report

The Finance Committee oversees the financial activities of the Institute and provides information and recommendations on financial matters to Council.

2024 results

The Institute made an operating deficit (before gains or losses on investments) of £244,000 for the year (2023: £622,000 surplus).

The Institute benefitted from increased income from membership subscriptions, student registrations and examinations, and investments in the year. Conference and events income also grew, recovering from a decline in 2023. Standard operating costs such as examination delivery and staff costs grew in line with inflation. The increase in the Institute's reported expenditure relates to a provision for dilapidations charges on the Monck Street headquarters, and the outcome of a strategic review of overseas qualifications delivery. held by CIOT can be readily converted into cash.

After the net gain on investments of £517,000 (2023: net gain £421,000), the net income for the year is a surplus of £273,000 (2023: £1,043,000).

Total income for the year was £11,302,000 which is an increase of £619,000 over last year (2023: £10,683,000). The increase in income came primarily from membership subscriptions, student registration and examination fees, conference and events, and investment income. Membership income was £7,109,000 (2023: £6,822,000), income from student registrations & examination fees was £2,882,000 (2023: £2,750,000), income from conference and events was £373,000 (2023: £285,000) and investment income was £336,000 (2023: £219,000).

Expenditure for the year amounted to £11,546,000 (2023: £10,061,000), an increase of £1,487,000 compared to 2023. £1,027,000 of the increase relates to non-recurrent expenditure items that will not require funding in 2025. These include £320,000 provision for dilapidations, £493,000 of professional and administrative fees associated with the strategic review of overseas qualification delivery and subsequent changes to their availability and pricing, and £214,000 of direct expenditure associated with the overseas delivery.

The value of investments at the end of 2023 increased, providing realised gains of £82,000, unrealised gains of £527,000 and realised losses of £92,000, the gains and losses netting to £517,000 (2023: realised gains of £1,000 and realised losses of £43,000 offset by unrealised gains £463,000, netting to gains of £421,000).

General Funds at the end of the year amount to £10,109,000 (2023: £9,837,000). Total funds at the end of 2023 amount to £10,127,000 (2023: £9,855,000).

The Institute continues to share staff and other administrative resources with the Association of Taxation Technicians which enables both organisations to benefit from economies of scale.

Membership numbers increased during the year to 20,193 at the end of 2024 (2023: 19,924).

The CIOT has reserves standing at £10,127,000 at 31 December 2024. These reserves have been built-up over the years to provide financial stability for the Institute to continue its charitable purposes in adverse circumstances and to support the Trustees' strategic objectives. The financial assets

The financial statements are prepared on a going concern basis, as the Trustees are satisfied that there is a reasonable expectation that there are adequate resources to continue in operational existence for the foreseeable future.

Investments

The valuations of CIOT investments increased over the year with net gains of £517,000 (2023: net gains of £421,000).

The Institute's primary reasons for investing is to ensure that sufficient funds are available to meet the required levels of reserves; to seek to maintain the real value of capital in those funds; and for those funds to provide a source of income to contribute towards the costs of its charitable activities. The Institute's powers of investment are set out in the Royal Charter which provides that funds not immediately required for any of the Institute's objects may be invested in such a manner as is prescribed in the Byelaws. The Byelaws provide wide-ranging investment powers.

The Finance Committee carries out regular reviews of its investments and their performance with the investment managers. This is to ensure that invested funds are sufficient to meet the obligations identified in the Institute's strategic

Council has not placed any specific ethical restrictions on investments but requires that its investment managers have comprehensive and integrated environmental, social and governance screening processes as a fundamental part of their investment decision-making, and that these are acceptable to Council.

We have made it clear to our investment managers that we take any risk to the CIOT's reputation very seriously and that this should always inform their investment decisions.

Reserves

The Trustees regularly review the charity's needs for reserves in line with the guidance issued by the Charity Commission and assess the risks involved in the activities of the Institute. They agreed that the purpose of its reserves policy should be to provide financial stability and the means for the development of the Institute's principal activity. During the year the Trustees introduced a fourth category of reserve to provide greater transparency regarding the purpose of the reserves. The four categories of reserve and their respective target levels are:

- The Working Capital Reserve: equal to two months of the Institute's budgeted annual operating expenditure, providing a target of £1,929,000.
- The Specific Reserve for future funding of the Taxation Disciplinary Board: £300,000.
- The Risk Reserve: equal to 75% of the budgeted annual amount of the principal sources of income of the Institute, namely its membership subscription income and its income from its education activities, providing a target of £8,677,000.
- The Strategic Reserve: No defined target, designation value to be determined through designation governance process.

The Working Capital Reserve provides funds for the normally expected fluctuations in the operating result and cashflow of the Institute, including financing for capital expenditure to maintain the Institute's operating capacity at its current capability.

The Risk Reserve provides a general reserve for the funding of the potential future effect of the adverse strategic risks to which the Institute is exposed.

The creation of the Strategic Reserve enables funds to be designated for future strategic developments, separating future investments from standard operating expenditure.

The total target for reserves at 31 December 2024 was £10,906,000. The actual reserves at the year-end amounted to £10,127,000. This is a deficit of £779,000 representing 7% of the reserves target.

Branches

The CIOT/ATT branches have a consolidated deficit of £139,000 (2023: deficit of £73,000) before central costs. Resource constraints subsequently resolved have resulted in reduced branch activity during 2024 resulting in the increase in deficit. Branches have continued their important role for members, and we regularly review the support provided to branches and the finance team at Head Office has responsibility for the branches' accounting.

Controls

Controls and systems are reviewed by CIOT management and are updated as necessary, in agreement with the Audit & Risk Committee, to ensure that appropriate support, control and best practice are achieved.

Chair of Finance Committee Jonathan Riley

Chief Finance Officer

Karl Cerski (retired 31 March 2024) Vicky Hilpert (from 4 March 2024)

Financial Controller Linda Mensah

Income 2024: £11,302,000 2023: £10,683.000 £7,109,000 £2,882,000 £602,000 £373,000 £336,000 Membership Student Conference Investment Income and event fees income from other **Subscriptions** registrations and charitable and trading activities examination fees **Expenditure** 2024: £11,547,000 2023: £10,061,000 £7,142,000 £855,000 £3,067,000 £483,000 **Education** Member Other expenditure Regulation and compliance services and student services

A full breakdown of CIOT income and expenditure is provided in the Notes on Financial Statements section of this report.

Equality, diversity and inclusion

Report from the Equality, Diversity and Inclusion (EDI) Committee

Throughout 2024, the CIOT and ATT CEOs and senior management have continued supporting the work of the joint Equality, Diversity and Inclusion Committee. This has centered on our first three-year EDI Strategy and accompanying action plan.

While much progress has been made over the last 12 months, we are not complacent. The strategy continues to help focus and support our shared EDI values across both organisations. The strategy is available to read on our website and has been communicated to members and stakeholders. Feedback from members and staff about our EDI Strategy and work is welcomed.

In 2024 our organisations continued to advance the strategy, which is aimed at promoting and embedding a positive EDI culture. This work is overseen by the joint EDI Committee and its independent chair, Olayinka Iwu.

The committee's key objectives are to:

- Grow and celebrate our diverse membership and volunteer community, reflecting the UK's cosmopolitan society.
- Increase CIOT and ATT's influence with stakeholders and government.
- Improve brand awareness of CIOT, the CTA community, and ATT.
- Deliver diversity of thought and experience for our members through our national and regional events programme and our leadership.

The committee met four times in 2024, reporting to both Councils on the progress of the 2024 action plan. The five aims of the plan are outlined below, accompanied by updates on the related initiatives.

Aim 1: Develop an inclusive environment

- Managers and staff received EDI training: a full day's EDI training for managers, a halfday workshop for staff with managers, and subsequent individual team discussions.
- All trustees were shown a reminder video on unconscious bias, and they will receive further EDI training in 2025.
- Trustee vacancies were advertised across several outlets, redacting some application details to prevent unconscious bias, and choosing as diverse an interview panel as was possible.
- With their permission, profiles of some students and members from diverse backgrounds were featured in Tax Adviser magazine and other publications.
- The 2024 Employee Opinion Survey results showed that 94% of employees felt that everyone was welcome regardless of background or identity, and 91% felt that they were treated fairly and with respect.

- CIOT and ATT received the Outstanding Workplace award for the second year running from People Insight for achieving a top-quartile engagement score in the annual Employee Opinion Survey.
- The Tax Adviser magazine website was updated to incorporate suggestions from the Web Content Accessibility Guidelines, enhancing usability for people with disabilities. We have also explored the option of implementing specialist software to review the Tax Adviser, ATT, and CIOT websites for compliance with updated accessibility guidelines.
- LITRG's <u>new website</u> incorporates a number of enhanced accessibility features, with eight profiles for visitors to choose from. Four of these are accessible on mobile devices.

Aim 2: Embed EDI values in our work

- In collaboration with the External Relations team, an Inclusive Language Guide was developed to support staff communications. It was updated during the November meeting to include a section on neurodiversity.
- CIOT's EDI Council champion, Nik Mehta, continued work with the technical team to review how we include EDI impacts in consultation responses.
- We continued to enhance event accessibility in 2024 by offering a mix of in-person, online and hybrid formats. We reviewed key event venues for accessibility and broadened the diversity of panelists by encouraging new speakers from our membership to participate and join our new speaker programme.
- A corporate inclusion calendar was maintained across both organisations, highlighting key holidays, festivals and other important dates. Meetings, events, key committees and steering groups were timed to avoid these dates, when possible.

Aim 3: Build an inclusive membership base

- Work was undertaken on understanding the diversity profile of our membership and volunteer base so that we could monitor engagement, progression and retention. As part of this process, there will be a survey in 2025.
- The committee collaborated with the Returning to Work working group to support members returning to employment after a career break.

Aim 4: Inspire the next generation

This activity largely focused on ATT's educational promotions to employers, tutors and school career information contacts, with the aim of encouraging careers in tax.

Aim 5: Be thought leaders for the tax profession

- We communicated the importance of an inclusive tax profession through articles in Tax Adviser magazine which outlined how the profession benefited from improved equality and diversity.
- We selected awareness days to highlight our connection to individuals across our membership and staff.

External engagement

In addition to working towards the five aims of our strategy, the EDI committee welcomed external speakers to help broaden its understanding of EDI issues affecting the tax profession.

In September, the committee welcomed a speaker from Grant Thornton to share the firm's experience of social mobility programmes, including its Social Mobility Taskforce Advisory Board, and the RISE initiative for students aged 14 to 16. This inspiring work will feed into the committee's plans for 2025.

In November, representatives from HMRC's Equalities and Extra Support for Customers team attended the committee to provide insights and updates on HMRC's EDI activity. discuss its work supporting vulnerable customers. HMRC continue to focus on improving customers' experiences, commissioning research, and collating insights on improving the design of the tax system. The committee appreciated HMRC's openness and the opportunity to exchange thoughts and ideas.

Additional speakers will be invited to attend committee meetings in 2025, enabling members to continue learning from other organisations' EDI initiatives while also sharing our own experiences and insights.

Committee changes

Over the course of 2024, we welcomed Kaila Engelsman, Sofia Thomas and Heather Wallace to the committee. Jim Robertson and Suzanne Willis have stepped back from the committee and we are grateful to them for their contributions.

Looking ahead

At the end of 2024, given the limited time and resources available, the committee were pleased to reflect on what had been achieved. At the February 2025 meeting, they will finalise an updated action plan. This will include some outstanding tasks from 2024 as well as new items for areas identified as priorities, such as social mobility and change.

Chair of EDI Committee

Olayinka Iwu

Chief Executive Helen Whiteman



Bridge the Gap is a joint campaign by the two tax charities, Tax Help for Older People and Tax Aid.

CIOT supports the tax charities in their efforts to meet the demand for free tax help and advice for vulnerable, low income taxpayers. The charities support more than 20,000 people, but demand continues to rise.

Please consider supporting the campaign to ensure they have the resources to be the profession's safety net for those unable to afford professional help, at bridge-the-gap.org.uk.

Reference and administrative information

(at 16 April 2025)

President

Charlotte Barbour MA CA CTA (Fellow) (2019)

Deputy President

Nichola Ross Martin CTA (Fellow) FCA (2017)

Vice-President

Paul Aplin OBE BSc FCA CTA (Fellow) (2017)

Immediate Past President

Gary Ashford CTA (Fellow) ATT (2011)

Other Members of Council

Susan Ball* CTA (Fellow) ATT (2017) John Barnett MA (Oxon) CTA (Fellow) TEP Solicitor (2014) Jo Bello LLB CTA (Fellow) ATT (Fellow) (2021) Alistair Cliff BSc BEng FCA CTA (Fellow) (2024) Sarah Hewson LLB CTA (Fellow) ATT (2021) Mobeen Ismail BSc CA CTA (Fellow) (2021) Ashley Makoni BSc Exec MBA CTA (Fellow) FCCA (2021) Nikhil Mehta LLB, Barrister CTA (Fellow) (2018) Peter Rayney* CTA (Fellow) FCA TEP (2016) Jonathan Riley CTA (Fellow) (2017) Christopher Shrubsole BSc Exec MBA CTA (Fellow) (2021) Xiaoshan Sun MSc CA CTA (Fellow) (2024) Sofia Thomas MSc (Oxon) CTA (Fellow) (2024) Penelope Tuck BSc PhD FCA CTA (Fellow) (2019)

Year of appointment to Council shown in brackets.

Public Interest Representative

Krzysztof Mikata-Pralat

Senior Management Team

Chief Executive

Helen Whiteman BA MSc PGDip

Director of Education

Vicky Purtill BA LLM (Public) MBA

Chief Operating Officer

Andrew Burnett BEng MBA CEng CMgr (until February 2025)

Chief Finance Officer

Vicky Hilpert ACMA

Director of Public Policy

Ellen Milner MA (Oxon) PGCert

Director of Governance

Rosalind Baxter BA ACIS



(L-R, Nichola Ross Martin, Charlotte Barbour, Paul Aplin)

Registered office

The Chartered Institute of Taxation 30 Monck Street London SW1P 2AP

^{*} indicates Past President

Committees of Council

Officers Group

Chair | Charlotte Barbour Deputy Chair | Nichola Ross Martin

Audit & Risk Committee (Joint CIOT/ATT)

Chair | Laura Tomlinson

Diploma in Tax Technology Committee

Chair | Paul Aplin

Education Committee

Chair | Jane Frecknall Hughes Vice-Chair | Chris Shrubsole

Equality, Diversity & Inclusion Committee (Joint CIOT/ATT)

Chair | Olavinka Iwu Vice-Chair | Reshma Johar

Examination Committee

Chair | Jo Bello Vice-Chair | Peter Coulthard

Finance Committee

Chair | Jonathan Riley (interim)

Membership & Branches Committee

Chair | Sarah Hewson

Nominations Committee

Chair | VACANT

Professional Standards Committee (Joint CIOT/ATT)

Chair | Tracy Easman Vice-Chair | Dhruti Shah

Technical Committees

Technical Policy and Oversight Committee

Chair | John Barnett Vice-Chair | Adrian Rudd Vice-Chair | Peter Dylewski

Scottish Technical

Chair | Sean Cockburn Vice-Chair | Melanie Wilson

Welsh Technical

Chair | Ritchie Tout

Corporate Taxes

Chair | Adrian Rudd Vice-Chair | Chris Lallemand

Employment Taxes

Chair | Eleanor Meredith Vice-Chair | Simon Adams Vice-Chair | Paul Tucker

International Taxes

Chair | David Murray Vice-Chair | Alastair Munro

Management of Taxes

Chair | Helen Adams Vice-Chair | Matthew Bridger

Owner Managed Business

Chair | Pete Miller Vice-Chair | James Geary Vice-Chair | Jitendra Patel

Private Client (International)

Joint Chair | Emma Chamberlain Joint Chair | Giles Clarke Vice-Chair | Michelle Robinson

Private Client (UK)

Chair | Danny Clifford Vice-Chair | David Mellor

Property Taxes

Chair | Leigh Sayliss Vice-Chair | Caroline Fleet

Indirect Taxes

Chair | Gabby Donald

Digitalisation and Agent Services

Chair | Alison Kerrey Vice-Chair | Andrew Jackson

Connected Charity

Association of Taxation Technicians 30 Monck Street London SW1P 2AP

Auditor

UHY Hacker Young Thames House Roman Square Sittingbourne Kent ME10 4BJ

Investment Advisers

RBC Brewin Dolphin Ltd 12 Smithfield Street London EC1A 9LA

Killik & Co LLP 46 Grosvenor Street London W1K 3HN

Solicitors

Stone King **Boundary House** 91 Charterhouse St Clerkenwell London EC1M 6HR

Structure, governance and management

The original Institute of Taxation was founded in 1930 and was registered as a charity in England and Wales in 1982 (1037771). Following the granting of a Royal Charter in 1994, the governing documents of the Institute are the Royal Charter and its byelaws.

Governance

The Institute operates within the terms of its Charter, byelaws and regulations and its management is under the control of the Council of the Institute. Good governance and leadership are essential for the success of the Institute. All Council members are trustees of the Institute.

Council formally resolved in July 2021 to adopt the Charity Governance Code for Larger Charities (the Code) and is committed to the good governance principles and outcomes it promotes. The Institute, under the apply or explain basis of the Code, reports the following deviations to the Code:

5.6.2 The current size of Council is 18, in excess of the suggested limit of 12 members recommended in the Code. The board size ensures a comprehensive representation of our membership and reflects the diverse interests of our stakeholders. This inclusivity allows for better decision-making, enhancing our ability to address specific needs and challenges. Council has agreed that 20 to 25 Council members are needed, but no new Council members will be appointed unless a clear skills gap or need has been identified. To maintain board efficiency, there are specialised committees to handle detailed work, enabling Council to focus on strategic issues. Additionally, meetings are structured with welldefined agendas and time allocations to keep discussions focused and productive.

Council thoroughly considers and justifies all deviations from the Code. This demonstrates our commitment to upholding the principles of good governance, transparency and accountability. We continuously review our governance to ensure alignment with the Code and best governance practices, helping to safeguard the interests of all our stakeholders.

5.7.4 Following the AGM, two Council members will have served a term of over nine years. The succession plan in place will ensure no future Council member serves a term of more than

Council regularly evaluates its performance through a self-assessment survey of its members. During the year Council carefully considered the report and recommendations which were the outcome of an external board review presented by Leading Governance and delivered in the last quarter of 2023.

The majority of the recommendations made were implemented during 2024, for example the creation of a Governance Manual bringing together all of the relevant governance documents in one place easily accessible to trustees. A small number of recommendations were not taken forward and the reasons why were documented.

The register of interests for Council members, the Lay Representative and senior staff are available on the Institute's website https://www.tax.org.uk/about-us/council. During 2024 the Conflicts of Interest policy was updated.

Council and Officers Group

Council comprised 18 trustees at the end of 2024 (2023: 18), providing a wide range of skills and experience. The members of staff who attend all Council meetings are the Chief Executive, Director of Education, Director of Public Policy, Chief Finance Officer, Chief Operating Officer, Director of Governance and Governance Officer. All their roles are separate and clearly defined. Other staff members attend for specific items when required.

Council considers that its members are independent and that no individual, or small group of individuals, can dominate Council decisions. Council has a formal agenda of matters specifically reserved to it for decision in accordance with article 5(3) of the Royal Charter. Council met six times in 2024 to deal with trustee business, review financial performance, strategy and risk. Council members achieved an overall attendance rate of 85% (2023: 84%). An attendance rate of 80% and above is considered best practice.

The Officers Group of Council comprises the CIOT President (Chair), Deputy President, Vice-President, Vice-President elect, Immediate Past-President, ATT President, CIOT Chief Executive, Director of Education, Director of Public Policy, Chief Finance Officer, Chief Operating Officer and Director of Governance.

The Officers Group met six times in 2024 to deal with day-to-day executive matters including reports from Institute executives. Overall attendance was 89% (2023: 82%).

In compliance with Council Regulation 10.9, Council members and other Standing Committee Members are required to make declarations of interests at meetings which might give rise to a conflict of interest or influence their vote on a resolution.

All members have access to internal advice and can access independent professional advice, such as legal or financial advice, at the Institute's expense if needed for Council, or Council members, to effectively discharge their duties. Trustee training is provided for new and existing Trustees and refreshed every year. New Council members are paired with an existing member to help and assist as required.

The Council Lay Representative attended all Council meetings in 2024. This role provides an independent voice contributing to the decisions of Council, governance and boardroom best practice.

Election to Council

Recruitment is via an open process overseen by the Nominations Committee. Vacancies are advertised in Tax Adviser, CIOT conferences, the weekly members' email and social media to attract CTAs with a diverse range of viewpoints and backgrounds.

Potential new Council members, who must also be Institute members (Byelaw 5 (5)), are selected for what they can contribute to the Institute and must sign a declaration that they are not disqualified from acting as a Trustee. The Nominations Committee supports the recruitment process by interviewing and recommending candidates, and by considering issues relating to succession planning. In 2024, it made minor changes to the process and began a skills and diversity audit of Council

Election is by members of the Institute at the Annual General Meeting. Council deals with nominations under Members Regulation 19 (Nominations for Election to Council) and is also responsible for the election of its Honorary Officers. Three new members joined Council in 2024

Audit & Risk Committee

The Audit & Risk Committee is an independent joint committee of the Councils of CIOT and ATT. Members are appointed by both Councils and comprise a serving member of each, a nominee from each of CIOT/ATT and two other independent members. The Chief Finance Officer, Chair of CIOT Finance Committee, ATT Honorary Treasurer, CIOT Chief Executive, ATT Chief Executive, Director of Education, Director of Public Policy, Director of Governance and Financial Controller attend the meetings.

Members of the committee receive no remuneration for their services, operate independently from the Council, have either an accountancy or taxation qualification, and recent and relevant experience.

The committee acts a catalyst in relation to matters affecting the Institute's financial controls, reporting requirements and risk management. It is authorised to seek any information it requires from members of the Council, external auditor and staff.

In this role it:

- Reviews financial control policies and their practical implementation.
- Examines budgets and management
- Considers changes in the external environment and the procedures used to respond to them.
- Oversees the risk management process at a strategic level.

It has a specific responsibility for the Institute's relationship with the external auditors, attending the audit planning and closure meetings, and has private meetings with the auditors as necessary.

The committee reviews the audit strategy document, ensuring all recommendations made by the auditors by way of their management letter receive attention and action. It met four times in 2024, requesting and receiving reports from management and the external auditor. It considers a wide range of audit-related subjects, reports directly to Council and comments on perceived weaknesses. No major weaknesses in internal control systems have been identified. Areas for discussion and review in 2024 included reserve policies and Goods & Services Tax in other territories.

Risk Management

It is Institute policy for staff and volunteers with a detailed knowledge of how CIOT operates to:

- Regularly review areas of uncertainty throughout the Institute.
- Develop mitigation strategies.
- Take action to mitigate all risks that would otherwise prevent the Institute from achieving its charitable objectives.

The strategic risk register is presented to Council and the Audit & Risk Committee quarterly. Key risks are grouped under headings which are: reputation, education, governance, regulation, influence, competition and partnership working. Operational risks are also captured on the register and regularly compared with the ATT.

Two key risks are:

Employers no longer seeing the CTA qualification as relevant to their business so withdrawing their support.

A review of the CTA qualification involving a wide range of stakeholders has taken place throughout 2024. See page 26 for more details.

Retention of members.

Mitigation includes demonstrating the Institute's authority and prestige by playing a leading role in the key issues in tax affecting the public and the profession. Members in practice are involved in all our activities from setting exams, engaging with government, holding each other to account for compliance with our professional rules (including the anti-money laundering regulations), and overseeing the management of the organisation.

Council members' Remuneration

Council members receive no remuneration for their services as trustees, although travel and subsistence costs are reimbursed when undertaking Institute business.

Internal Controls

The responsibilities of the Council and Auditor in connection with the financial statements are shown on pages 48-51. The Council Statement on going concern is set out on page 55.

Council is responsible for the Institute's system of internal controls and for taking such steps as are reasonably open to it to safeguard the Institute's assets and to prevent and detect fraud and other irregularities.

The Charities Governance Code emphasises the importance of maintaining and regularly reviewing financial controls, performance reporting, and policies and procedures, with Council periodically taking steps to assure itself of their effectiveness. As with all such systems, internal control is designed to manage rather than eliminate the risk of failure to achieve strategic objectives and can provide reasonable and not absolute assurance against material misstatement or loss.

Quarterly management accounts are presented at Council meetings and measured against both budget and interim forecasts. A clear organisation structure with defined authority limits has been established. Council keeps under review the need for internal audit at the Institute.

Data Protection

The Institute complies with data protection legislation, using up to date industry procedures to keep personal data as safe and secure as possible and to protect against loss, unlawful processing, unauthorised disclosure or access. The Institute also retains an independent GDPR consultant to provide updates, advice and training.

Staff and volunteers

Council recognises building and developing skills, competencies, teamwork and employee motivation is key to achieving CIOT's charitable aims.

CIOT employees are responsible for operational matters, supporting the CEO in matters delegated in the Scheme of Delegation. To support this, the Institute relies on the commitment and positive support of volunteers. All staff, except the Chief Executive and the CIOT lay representative, who are employed by the Institute, and the Chief Executive of the Association of Taxation Technicians (ATT), who is employed by the ATT are jointly employed by CIOT and the ATT (the CIOT's connected charity, registered in England & Wales, 803480), with whom we have a Service Level Agreement.

The average number of employees in the year was 94.75 (2023: 88.75). At 31 December 2024, the total number of employees was 95, with 32 part-time and 63 full-time (2023, 89 employees). 64 staff members are female (63%) and 19 (20%) come from an ethnic minority background. We are supportive of diversity and inclusiveness as shown by the 94% of our staff who agree that "Everyone is welcome at CIOT/ATT, regardless of background or identity."

During 2024 we continued our focus on employee wellbeing with quarterly London based all-staff events including wellbeing and learning days. Our employee engagement survey had an 84% completion rate and an engagement score of 90%. As a result, we achieved the "Outstanding Place to work" award from People Insight, a global employee survey consultancy, for the second year running. The pay policy continues to support transparency, market rate pay control and financial planning, while staff productivity and performance is marked by managers as generally well above satisfactory.

Institute members and students are encouraged to become involved in Institute activities. There are over 750 volunteers on Council, standing committees, technical committees, subcommittees, branches and working parties (2023: 750). The Institute is grateful not only for their generous input but also to their firms who may ultimately bear the financial cost, including those members who are self-employed. An estimated 18,350 volunteer hours were provided in 2024 (2023: 18,350). A member of staff seconded to the Institute from HMRC contributed an estimated 1,295 hours.

IT

We continue to make strides in optimising the efficiency and effectiveness of our business operations through strategic investments in our IT infrastructure. Our unwavering dedication to IT security is a cornerstone of our approach, with ongoing investments in cutting-edge technologies to ensure resilience and adherence to top industry standards. A key milestone in our security enhancement initiatives has been obtaining CyberEssentials+ certification.

This certification, a government-endorsed scheme overseen by the UK's National Cyber Security Centre (NCSC), establishes a strong framework of technical controls to safeguard organisations against common cyber threats. This certification process combines self-assessment with thorough independent technical testing by accredited third parties. By adopting these measures, we can significantly mitigate the risk of cyber-attacks. In the midst of our digital transformation, we remain resolute in our commitment to anticipating and countering emerging threats.

Health and Safety

The nature of CIOT's activities means employees and volunteers do not encounter many workplace hazards. As a responsible employer the health, safety and wellbeing of staff receives ongoing management attention to ensure a safe working environment. A general policy statement of health and safety at work is included in the Employee Handbook and was updated in 2024 with the Health and Safety Committee's support. Ongoing responsibilities include assessment and management of areas of exposure, organisational and remote workers' risk assessments, first aid, issuing and displaying statutory information and increasing employee awareness of their role maintaining a safe environment.

During 2024 we continued to support staff through continued access to counselling, private GP and medical services, as well as access to a range of wellbeing online resources and seminars and reasonable adjustments.

Safeguarding

The Safeguarding Focus Group members are all Mental Health First Aiders. During 2024 they reviewed the Safeguarding policy with employee involvement.

Equality, Diversity and Inclusion

The Institute is committed to providing equal opportunities to job applicants, staff, students and volunteers regardless of sex, sexual orientation, marital status, age, race, ethnicity, religion or belief or disability. The Institute seeks to conduct its activities in full adherence to all applicable laws prohibiting discrimination in employment or service provision, and to develop and maintain a diverse workforce of staff and volunteers. All new employees undergo diversity and unconscious bias training as part of their induction.

The Nominations Committee has consulted the Equality, Diversity and Inclusion Committee as part of the recruitment process for Council appointments and proposed questions in the 2025 diversity survey of members of Council.

Environment

The Institute continues to take steps to assess and address its carbon footprint, with the aim of achieving a 50% reduction in emissions by 2030 (based on a 2019 baseline).

The most recent emissions data (from 2021) indicated a carbon footprint of 54 metric tonnes of carbon dioxide equivalent (tCO2e). This is the standard definition used to communicate the total greenhouse gas emissions of an organisation.

The figure is down on the 2019 level of 95 tCO2e, driven by the impact of the coronavirus pandemic and shift to remote working. Although the Institute is a low polluter, it is nevertheless committed to taking steps to reduce its carbon emissions. In December 2023, Council adopted a sustainability policy incorporating this work.

Fundraising

The CIOT does not raise funds for itself through asking for public donations in any form.

Statement of Council members' responsibilities and statement of disclosure to the Auditor

Statement of Council members' responsibilities

Council members, as trustees of the Institute, are responsible for preparing the Annual Report of the Council and the financial statements in accordance with applicable law and United Kingdom Accounting Standards (United Kingdom Generally Accepted Accounting Practice).

The law applicable to charities in England and Wales requires the trustees to prepare financial statements for each financial year which give a true and fair view of the state of affairs of the charity and of its income and expenditure for that period.

In preparing these financial statements, the trustees are required to:

- Select suitable accounting policies and then apply them consistently.
- Observe the methods and principles in Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with the Financial Reporting Standard applicable to the United Kingdom and Republic of Ireland (FRS 102).
- Make judgments and estimates that are reasonable and prudent.
- State whether applicable accounting standards have been followed, subject to any material departures disclosed and explained in the financial statements.
- Prepare the financial statements on the going concern basis unless it is inappropriate to presume that the charity will continue in

The trustees are responsible for keeping proper accounting records that disclose with reasonable accuracy at any time the financial position of the charity and enable them to ensure that the financial statements comply with the Charities Act 2011, the Charity (Accounts and Reports) Regulations 2008 and the provisions of the Royal Charter. They are also responsible for safeguarding the assets of the charity and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

Statement of disclosure of information to the **Auditor**

The trustees who are in office on the date of approval of these financial statements have confirmed, as far as they are aware, that there is no relevant audit information of which the auditor is unaware. Each of the trustees has confirmed that they have taken all the steps that they ought to have taken as trustees in order to make themselves aware of any relevant audit information and to establish that it has been communicated to the auditor.

This report was approved by Council on 16 April

By order of the Council.

Rosalind Baxter **Director of Governance**

Independent Auditors' report

Independent auditors' report to the trustees of the Chartered Institute of Taxation

Opinion on the financial statements

We have audited the financial statements of the Chartered Institute of Taxation (the 'Charity') for the year ended 31 December 2024 which comprise the statement of financial activities, the balance sheet, the statement of cash flows and notes to the financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable by law and United Kingdom Accounting Standards, including Financial Reporting Standard 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland' (United Kingdom Generally Accepted Accounting Practice).

In our opinion, the financial statements:

- give a true and fair view of the state of the Charity's affairs as at 31 December 2024 and of its incoming resources and application of resources for the year then ended;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- have been prepared in accordance with the requirements of the Charities Act 2011.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditors' responsibilities for the audit of the financial statements section of our report. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Independence

We remain independent of the Charity in accordance with the ethical requirements relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

Conclusions related to going concern

In auditing the financial statements, we have concluded that the Council's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Charity's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the Council (who are the Trustees of the charity for the purpose of Charity Law) with respect to going concern are described in the relevant sections of this report.

Other information

The Council is responsible for the other information. The other information comprises the information included in the Annual Report, other than the financial statements and our auditors' report thereon. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon. Our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report

We have nothing to report in this regard.

Matters on which we are required to report by exception

We have nothing to report in respect of the following matters in relation to which the Charities Act 2011 requires us to report to you if, in our opinion:

- the information given in Council's annual report is inconsistent in any material respect with the accounts;
- sufficient accounting records have not been
- the accounts are not in agreement with the accounting records or returns, and;
- we have not received all the information and explanations we require for our audit.

Responsibilities of trustees

As explained more fully in the Statement of Council members' responsibilities, the Council is responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the Trustees determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Council is responsible for assessing the Charity's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Council either intend to liquidate the Charity or to cease operations, or have no realistic alternative but to do so.

Auditors' responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Extent to which the audit was capable of detecting irregularities, including fraud

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud, is detailed

Non-compliance with laws and regulations

Based on:

- our understanding of the Charity and the sector in which it operates;
- discussion with management and those charged with governance, including Audit & Risk Committee, legal counsel and internal audit; and
- obtaining an understanding of the Charity's policies and procedures regarding compliance with laws and regulations;

We considered the significant laws and regulations to be the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS102), the Charities SORP (FRS 102), Charities Act 2011 and UK and international tax legislation.

Regulations where the consequence of noncompliance could have a material effect on the amount or disclosures in the financial statements, for example through the imposition of fines or litigations. We identified such laws and regulations to be Health and Safety Act 1974, Data Protection Act 2018, Employment Rights Act 1996, and the Bribery Act 2010.

Our procedures in respect of the above included:

- review of financial statement disclosures and agreeing to supporting documentation;
- review of minutes of meetings of those charged with governance for any instances of non-compliance with laws and regulations;
- review of correspondence with regulatory and tax authorities for any instances of noncompliance with laws and regulations; and
- review of legal expenditure accounts to understand the nature of expenditure incurred.

Fraud

We assessed the susceptibility of the financial statements to material misstatement, including fraud. Our risk assessment procedures included:

- enquiry with management and those charged with governance regarding any known or suspected instances of fraud;
- obtaining an understanding of the Charity's policies and procedures relating to:
 - detecting and responding to the risks of fraud; and
 - internal controls established to mitigate risks related to fraud.
 - review of minutes of meeting of those charged with governance for any known or suspected instances of fraud;
 - discussion amongst the engagement team as to how and where fraud might occur in the financial statements;
 - performing analytical procedures to identify any unusual or unexpected relationships that may indicate risks of material misstatement due to fraud.

Based on our risk assessment, we considered the areas most susceptible to fraud to be journals and key estimates and judgements.

Our procedures in respect of the above included:

- testing a sample of journal entries throughout the year, which met a defined risk criteria, by agreeing to supporting documentation;
- assessing significant estimates and judgements made by management for bias, including the recognition of provisions and allocation of support costs;
- testing the existence and accuracy of income recognised in the year.

We also communicated relevant identified laws and regulations and potential fraud risks to all engagement team members and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

Our audit procedures were designed to respond to risks of material misstatement in the financial statements, recognising that the risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error, as fraud may involve deliberate concealment by, for example, forgery, misrepresentations or through collusion.

There are inherent limitations in the audit procedures performed and the further removed non-compliance with laws and regulations is from the events and transactions reflected in the financial statements, the less likely we are to become aware of it.

A further description of our responsibilities for the audit of the financial statements is located at the Financial Reporting Council's ("FRC's") website at: frc.org.uk/auditorsresponsibilities. This description forms part of our auditors' report.

Use of our report

This report is made solely to the Charity's Council, as a body, in accordance with section 144 of the Charities Act 2011 and with regulations made under section 154 of that Act . Our audit work has been undertaken so that we might state to the Charity's Council those matters we are required to state to them in an auditor's report and for no other purpose . To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Charity and the Charity's Council as a body, for our audit work, for this report, or for the opinions we have formed.

UHY Hacker Young

UHY Hacker Young

Chartered Accountants Statutory Auditors Thames House Roman Square Sittingbourne Kent ME10 4BJ

17 April 2025

Financial statements

Statement of financial activities for the year ended 31 December 2024

	Note	Restricted Funds 2024 £'000	Unrestricted Funds 2024 £'000	Total Funds 2024 £'000	Restricted Funds 2023 £'000	Unrestricted Funds 2023 £'000	Total Funds 2023 £'000
Income from:							
Donations and legacies	3а	0	35	35	20	55	75
Charitable activities	3b	0	10,887	10,887	0	10,351	10,351
Other trading activities	3с	0	44	44	0	38	38
Investments	3d	0	336	336	0	219	219
Total Income		0	11,302	11,302	20	10,663	10,683
Expenditure on:							
Raising funds	3e	0	41	41	0	39	39
Charitable activities	3е	0	11,506	11,506	2	10,020	10,022
Total expenditure		0	11,547	11,547	2	10,059	10,061
Operating (loss)/ gain		0	(245)	(245)	18	604	622
Net gain on investments	7	0	517	517	0	421	421
Net income and net movement in funds		0	272	272	18	1,025	1,043
Reconciliation of funds							
Total funds brought forward at 1 January	14	18	9,837	9,855	0	8,812	8,812
Total funds carried forward 31 December	14	18	10,109	10,127	18	9,837	9,855

The above results are derived from continuing activities and all gains and losses recognised in the year are included above. The notes on pages 55-68 form part of these financial statements.

Financial statements

Balance sheet as at 31 December 2024

	Note	2024 £'000	2023 £'000
Fixed Assets:			
Tangible assets	5	339	372
Intangible Assets	6	695	887
Investments	7	6,125	6,358
Total Fixed Assets		7,159	7,617
Current Assets:			
Stock	8	117	63
Debtors	9	1,588	2,516
Cash at bank and in hand	10	6,365	3,714
Total Current Assets		8,070	6,293
Liabilities:			
Creditors: falling due within one year	11	(4,331)	(3,819)
Net Current Assets/(Liabilities)		3,739	2,474
Total assets less current liabilities		10,898	10,091
Creditors: amounts falling due after more than one year	12	(237)	(236)
Provisions for liabilities	16	(534)	0
Net Assets		10,127	9,855
Funds of the charity:			
Restricted	14	18	18
Unrestricted	14	10,109	9,837
Total Funds		10,127	9,855
Approved and authorised for issue by the Council on 16 April 2025 and signed on its behalf by:			

Charlotte Barbour President

Vicky Hilpert Chief Financial Officer

> Helen Whiteman Chief Executive

The notes on pages 55-68 form part of these financial statements.

Financial statements

Statement of cash flows for the year ended 31 December 2024

	2024 £'000	2023 £'000	
Net cash provided by operating activities (Table A)	1,740	249	
Cashflow from investing activities			
Dividend and interest from investments	336	219	
Movement on term deposits	485	258	
Purchase of tangible fixed assets	(72)	(43)	
Purchase of intangible fixed assets	(104)	(283)	
Proceeds from sale of investments	1,873	1,205	
Purchase of investments	(1,607)	(3,407)	
Net cash provided by/(used in) investing activities	911	(2,051)	
Increase/(Decrease) in cash and cash equivalents in the year	2,651	(1,802)	
Cash and cash equivalents at 1 January	3,714	5,516	
Cash and cash equivalents at 31 December (Table B)	6,365	3,714	
Table A			
Reconciliation of net income to net cashflow from operating activities			
Net income as per Statement of Financial Activities	272	1,043	
Adjustments for:			
Depreciation charge for the year	98	103	
Amortisation charge for the year	295	371	
Loss on disposal of fixed assets	7	0	
Dividends and interest from investments	(336)	(219)	
Gain on investments	(517)	(421)	
(Increase)/Decrease in stock	(54)	8	
Decrease/(Increase) in debtors	928	(642)	
Increase/(Decrease) in creditors	513	(16)	
Increase in provisions	534	0	
Increase in creditors (long term)	0	22	
Net cash provided by operating activities	1,740	249	
Table B			
Analysis of cash and cash equivalents			
Cash at bank	449	17	
Notice deposits (less than 3 months)	5,916	3,697	
Total cash and cash equivalents	6,365	3,714	
Analysis of changes in net debt		At 1 January 2024 £'000 £	
Cash		3,714	2,651

Analysis of changes in net debt	At 1 January 2024 £'000	Cash flows £'000	At 31 December 2024 £'000
Cash	3,714	2,651	6,365
Total	3,714	2,651	6,365

The notes on pages 55-68 form part of these financial statements.

1. General Information

The Chartered Institute of Taxation ("CIOT" / "the Institute") is a charity incorporated by Royal Charter, registered with the Charity Commission for England and Wales (registered charity, England and Wales, 1037771). The CIOT's registered office is 30 Monck Street, London SW1P 2AP.

The principal activities of the Institute are: a professional membership and awarding body for tax advisers; promoting and enforcing standards of professional conduct; working for greater public understanding of tax matters; and providing guidance on tax matters for those unable to afford tax advice.

2. Accounting policies

The principal accounting policies adopted, judgements and key sources of estimation and uncertainty in the preparation of the financial statements are as follows:

Basis of preparation of accounts

The financial statements are presented in sterling and rounded to the nearest thousand pounds. The financial statements have been prepared in accordance with the Charities SORP (FRS 102) (second edition – October 2019), "Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102)", the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) (January 2022) and the Charities Act 2011.

The financial statements have been prepared to give a 'true and fair' view and have departed from the Charities (Accounts and Reports)
Regulations 2008 only to the extent required to provide a 'true and fair view'. This departure has involved following Accounting and Reporting by Charities preparing their accounts in accordance with the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) issued on 16 July 2014 rather than the Accounting and Reporting by Charities: Statement of Recommended Practice effective from 1 April 2005 which has since been withdrawn.

The Chartered Institute of Taxation meets the definition of a public benefit entity under FRS 102. Assets and liabilities are initially recognised at historic cost or transaction value unless otherwise stated in the relevant accounting policy notes.

The financial statements of the Institute for the year ended 31 December 2024 include the results of its Branches, which are not separate legal entities, for the 12 months ended 31 December 2024 (2023: 12 months ended 31 December 2023).

The Association of Taxation Technicians of 30 Monck Street, London SW1P 2AP is a connected charity but it is not subordinate to the Institute and therefore consolidated financial statements have not been prepared. Further information on the relationship can be found in note 20.

Going Concern

As detailed in the Council members' responsibilities statement, the Trustees are required to prepare the accounts on a going concern basis unless it is inappropriate to presume that the charity will continue in business. The Trustees conclude that the CIOT has sufficient resources to continue in operational existence, and accordingly continue to prepare the accounts on a going concern basis.

Income Recognition

Income is recognised when the charity has entitlement to the funds, any performance conditions attached to the item of income have been met and it is probable that the income will be received and the income can be reliably measured.

Student registration fees are not refundable and are credited to income over the period of the registration with 50% recognised in the first year and 25% in each subsequent year. This phasing reflects the additional administration costs incurred in the first year of registration.

Subscriptions, sponsorship, examination fees and registration income are credited to income over the period to which they relate with that portion relating to subsequent years included in creditors. The date to which examination fees relate is deemed to be the date of the examination.

Investment income from the Institute's portfolio of investments is credited on an earnings basis each year.

Income from government and other grants, whether 'capital' or 'revenue' grants, is recognised when the charity has entitlement to the funds, any performance conditions attached to the funds are met, it is probable that the income will be received, and the amount can be measured reliably and is not deferred. Grants received by CIOT provided by government and charitable foundations are not conditional on delivering certain levels or volumes of a service or supply of charitable goods, and have been classified as donations and legacies in line with the Charities SORP.

Expenditure recognition

Expenditure is recognised once there is a legal or constructive obligation to make payment to a third party, it is probable that the settlement will be required and the amount of the obligation can be measured reliably. Expenditure is classified under the following headings:

- Expenditure on raising funds comprises the costs of commercial trading and investment management costs.
- Expenditure on charitable activities includes, but is not limited to, the cost of regulation and compliance, student services, education, governance and grants.
- Irrecoverable VAT is charged as a cost against the activity for which the expenditure was incurred.

Donated services and facilities

In accordance with Charities SORP (FRS 102) the contribution of unpaid volunteers is not recognised as income in the financial statements given the absence of a reliable measurement basis. More information about the contribution is given on page

Donated services and facilities are recognised on receipt or supply, on the basis of the value of donation or contribution which is the amount that the Institute would be willing to pay or charge to obtain or supply facilities and services on the open market, where the value of the gift can be measured reliably. Corresponding amounts are recognised as income and expenditure in the

CIOT is occasionally provided with the use of meeting rooms for Committee meetings by accountancy and taxation firms, where their employee is a Committee member. As the Institute would not normally purchase the use of meeting rooms for this purpose, and the value of the donated facilities cannot be measured reliably,

these instances have not been recognised as income and expenditure in the accounts.

Significant accounting estimates and judgements

Preparation of the accounts requires the trustees and management to make significant judgements and estimates.

The items in the financial statements where these include judgements and estimates have been made

- Estimating the useful economic life of tangible fixed assets for the purposes of determining a depreciation rate.
- Estimating the useful economic life of intangible fixed assets for the purposes of determining an amortisation rate.
- Estimating the future liabilities associated with the operating lease for the Monck Street office for purposes of determining the dilapidations provision.
- Estimating the carrying value of assets for the purposes of ensuring that this does not exceed their recoverable amount.
- Estimating the recoverability of debtors for the purposes of determining the bad debt provision.
- Estimating global tax obligations for the purpose of determining the tax provision.

The tax provision relates to potential historic liabilities for indirect tax in various jurisdictions throughout the world. As more and more jurisdictions review their tax legislation, CIOT continues to manage the settlement of any liabilities with support from third party tax advisers both in-country and in the UK. The Charity Commission have been informed.

As set out in these accounting policies under "Going Concern", the Trustees have considered that it is appropriate for the charity to continue to prepare its accounts on the going concern basis.

Allocation of support costs

Support costs are central administration costs that assist the work of the charity but do not directly undertake charitable activities and are allocated across the categories of charitable expenditure. The basis of the allocation is given in note 3e to the financial statements.

Intangible and Tangible Fixed Assets and Depreciation and Amortisation

All single purchases of less than £1,000 (inc VAT) are written off in full to the Statement of Financial Activities in the year of purchase unless forming part of a bulk purchase where the total is £1,000 (inc VAT) or more, which is capitalised. Depreciation and amortisation are calculated to write off the cost of fixed assets over their estimated useful lives on a straight-line basis as follows:

- Leasehold improvements are written off over the remaining life of the lease (10 years).
- Office equipment 25%.
- Intangible assets relating to CRM and accounting system 20%.
- Intangible assets relating to Diploma in Tax Technology 15%.

Fixed Asset Investments

Investments have been valued at fair value at 31 December 2024. The fair value of investments quoted on a recognised stock exchange is the quoted bid price. Account is therefore taken of both realised and unrealised gains/losses in the Statement of Financial Activities.

Stock

Stock is valued at the lower of cost and net realisable value. An annual review is carried out for any obsolete stock which is written off accordingly.

Debtors

Trade and other debtors are recognised at the settlement amount due. Prepayments are valued at the amount prepaid net of any discounts due.

Cash at bank and in hand

Cash at bank and cash in hand includes cash and short-term highly liquid investments with a short maturity of three months or less from the date of acquisition or opening of the deposit or similar account.

Creditors and Provisions

Creditors and provisions are recognised where the charity has a present obligation resulting from a past event that will probably result in the transfer of funds to a third party and the amount due to settle the obligation can be measured or estimated reliably. Creditors and provisions are normally recognised at their settlement amount after allowing for any discounts due.

Financial instruments

The charity only has financial assets and financial liabilities of a kind that qualify as basic financial instruments and are not considered to be of a financing nature. Such financial instruments, except for investments classified at fair value through profit or loss, are initially recognised at the transaction value and subsequently measured at their settlement value.

Pension Costs

Members of staff are eligible to join the Institute's defined contribution retirement benefit scheme. The scheme provides individual pension plans which are managed by independent pension providers. The amounts charged to the statement of financial activities in respect of pension costs is the actual contribution payable in the year.

Foreign Currencies

Monetary assets and liabilities in foreign currencies are translated to sterling at rates applying at the balance sheet date. Transactions in foreign currencies are recorded at the rate set at the date of the transaction. All differences are taken to the Statement of Financial Activities.

Taxation

The CIOT meets the definition of a charity in Schedule 6 Finance Act 2010 and accordingly is entitled to the exemptions set out in Part II Corporation Tax Act 2010 and Section 256 Taxation of Chargeable Gains Act 1992 to the extent that its income and gains are applied for charitable purposes.

Operating Leases

The charity classifies the lease of property as an operating lease; the title of the property remains with the lessor and the lease agreement expires in 2028 whilst the economic life of such property typically exceeds this. Rental charges are charged on a straight line basis over the term of the lease.

Fund Accounting

Unrestricted funds are available to spend on activities that further any of the purposes of the charity. Designated funds comprise unrestricted funds that have been set aside by the trustees for particular purposes. Restricted funds are funds which are to be used in accordance with the specific restrictions imposed by donors.

3. Analysis of income and expenditure

3a. Income from donations and legacies

	2024 £'000	2023 £'000
Grants receivable	35	75
Total income from donations and legacies	35	75

The grants received in 2024 were unrestricted. Grants received in 2023 consisted of £20,000 restricted legacy funding and £55,000 of unrestricted funding. Government grants received in the year amounting to £35,000 (2023: £54,563) relate to the Institute's work in maintaining the content on the website revenuebenefits.org.uk. There were no unfulfilled conditions or other contingencies attaching to the grants that were recognised in income. The Institute did not benefit from any other forms of government assistance during the year (2023: £nil).

3b. Income from charitable activities

	2024 £'000	2023 £'000
Membership Subscriptions	7,109	6,822
Chartered Tax Adviser registration fees and entrance fees	51	48
Student registrations and examination fees	2,882	2,750
Conference and Event fees	373	285
Sale of books and journals	161	138
Anti Money Laundering fees	311	308
Total Income from Charitable Activities	10,887	10,351

3c. Income from other trading activities

	2024 £'000	2023 £'000
Sponsorship	14	8
Letting office space to other charitable organisations	30	30
Total income from other trading activities	44	38

3d. Investment income

	2024 £'000	2023 £'000
Dividend income	113	103
Other interest receivable	223	116
Investment Income	336	219

3e. Breakdown of expenditure

	Direct expenditure £'000	Direct staff costs £'000	Support costs £'000	Grant making activities £'000	Total 2024 £'000
Charitable activities					
Grants payable	0	0	0	94	94
Education and student services	1,732	2,205	3,205	0	7,142
Members Services	743	947	1,377	0	3,067
Regulation and compliance	207	264	384	0	855
Promotion	85	107	156	0	348
Total expenditure on charitable activities	2,767	3,523	5,122	94	11,506
Raising funds					
Investment management costs	41	0	0	0	41
2024	2,808	3,523	5,122	94	11,547

	Direct Expenditure £'000	Direct Staff Costs £'000	Support Costs £'000	Grant making activities £'000	Total 2023 £'000
Charitable activities					
Grants payable	0	0	0	72	72
Education and student services	1,194	1,821	2,382	0	5,397
Members Services	696	1,061	1,389	0	3,146
Regulation and compliance	239	363	475	0	1,077
Promotion	73	111	146	0	330
Total expenditure on charitable activities	2,202	3,356	4,392	72	10,022
Raising funds					
Investment management costs	39	0	0	0	39
2023	2,241	3,356	4,392	72	10,061

Support costs and governance costs are central administration costs allocated to each activity on the same proportional basis as expenditure incurred directly and are analysed as follows:

	Total 2024 £'000	Total 2023 £'000
Support costs		
Information technology	997	1,030
Staff costs	1,982	1,903
Operating costs	822	514
Depreciation	98	103
Amortisation	295	371
Property	294	273
Legal and professional fees	587	171
Governance costs		
Auditors' remuneration	21	19
Council meetings (inc. Council member's expenses)	25	9
	5,122	4,392

Grants payable to tax charities, other charities and individuals to help meet the core operating costs of providing free tax advice to persons who cannot afford to pay for professional help or training, original tax research, and to promote public understanding of tax matters:

	Total 2024 £'000	Total 2023 £'000
Tax Advisers Benevolent Fund (registered Charity no. 1049658)	15	15
Tax Aid (registered Charity no. 10622852)	30	30
Tax Volunteers (registered Charity no. 1102276)	30	30
Grants payable to University Students for original tax research	4	(18)
Grant for Journal of Tax Administration	15	15
	94	72

The writeback of grants payable to university students relates to commitments not fully utilised that have been written back.

4. Net income (expenditure) for the year

This is stated after charging/(crediting):	2024 £'000	2023 £'000
Depreciation	98	103
Amortisation	295	371
Fair value (gains)/losses on investments	(517)	(421)
Operating lease rentals	343	343
Auditors' remuneration:		
Statutory audit	18	17
Loss on disposal of tangible fixed asset	7	0

5. Tangible fixed assets

	Leasehold Improvements	Office equipment	Total Tangible Fixed Assets
	£'000	£'000	£'000
Cost at 1 January 2024	528	873	1,401
Additions	0	72	72
Disposals	0	(25)	(25)
Cost at 31 December 2024	528	920	1,448
Depreciation at 1 January 2024	(264)	(765)	(1,029)
Change for the year	(53)	(45)	(98)
Disposals	0	18	18
Depreciation at 31 December 2024	(317)	(792)	(1,109)
Net book value at 31 December 2024	211	128	339
Net book value at 31 December 2023	264	108	372

6. Intangible assets

	Software £'000
Cost at 1 January 2024	3,659
Additions	103
Cost at 31 December 2024	3,762
Amortisation at 1 January 2024	(2,772)
Charge for the year	(295)
Amortisation at 31 December 2024	(3,067)
Net book value at 31 December 2024	695
Net book value at 31 December 2023	887

7. Fixed asset investments

	2024 Listed Investments £'000	2023 Listed Investments £'000
Fair value at 1 January	6,358	3,993
Additions at cost	1,607	3,407
Disposal proceeds	(1,872)	(1,205)
Net gains on investments	517	421
Movement on cash/deposits	(485)	(258)
Fair value at 31 December	6,125	6,358
Historical cost	5,512	5,878

Listed investments held at 31 December 2024 comprised of the following:		
Fixed interest	471	470
Listed UK equities	524	803
Listed international equities	4,865	4,276
Other assets	265	324
Gilts	0	485
	6,125	6,358

All investments are carried at their fair value. Investments in bonds, equities, property, and alternative investments are all traded on quoted public markets. The basis of fair value for quoted investments is equivalent to the market value, using bid price. Asset sales and purchases are recognised at the date of trade at cost (i.e. their transaction value). The significance of financial instruments to the ongoing financial sustainability of the Institute is considered in the financial review and investment policy and performance sections of Council's Report. The main risk to the Institute from financial instruments lies in the combination of uncertain investment markets and volatility in yield. The Institute manages these investment risks by retaining expert advisers and operating an investment policy that provides for a high degree of diversification of holdings within investment asset classes that are quoted on recognised stock exchanges. The Institute does not make use of derivatives and similar complex financial instruments as it takes the view that investments are held for their longer-term total return.

8. Stock

	2024 £'000	2023 £'000
Publications and merchandise	117	63

9. Debtors

	2024 £'000	2023 £'000
Trade debtors	219	1,104
Other debtors	149	155
The Association of Taxation Technicians	160	188
Taxes and social security	27	31
Prepayments and accrued income	1,033	1,038
	1,588	2,516

10. Cash in bank and in hand

	2024 £'000	2023 £'000
Cash at bank	449	17
Cash on short-term deposit	5,916	3,697
	6,365	3,714

11. Creditors: amounts falling due within one year

	2024 £'000	2023 £'000
Trade creditors	631	441
The Association of Taxation Technicians	0	4
Other creditors	82	83
Taxes and social security	158	176
Accruals	1,267	616
Deferred income	2,193	2,499
	4,331	3,819

Deferred income

	2024 £'000	2023 £'000
Amount brought forward	2,499	1,904
Released in the year	(2,501)	(1,900)
Amounts deferred in the year	2,195	2,495
Amount carried forward	2,193	2,499

Deferred income relates primarily to amounts received in advance for subscriptions, exams and student registration fees. As noted in the accounting policies, student registration fees are credited to income over the period of registration, some of which are greater than one year.

12. Creditors: amounts falling due after one year

	2024 £'000	2023 £'000
Student registration fees:		
At 1 January	236	214
Fees received in advance	371	361
Release of income in year	(370)	(339)
At 31 December	237	236

13. Financial instruments

The carrying amount of the charities financial instruments at 31 December were:

	2024 £'000	2023 £'000
Financial assets measured at fair value through profit or loss	6,125	6,358
Total	6,125	6,358

Financial instruments measured at fair value through profit or loss comprise listed investments.

14. Statement of funds

	At 01.01.24 £'000	Income £'000	Expenditure £'000	Gains/ (losses) £'000	Transfer £'000	At 31.12.24 £'000
Restricted						
LITRG Reserve	18	0	0	0	0	18
Unrestricted						
General:						
Working capital reserve	1,677	11.302	(11,547)	517	0	1,949
Risk reserve	7,860	0	0	0	0	7,860
Designated:						
Disciplinary procedures	300	0	0	0	0	300
Total unrestricted	9,837	11,302	(11,547)	517	(0)	10,109
	9,855	11,302	(11,547)	517	(0)	10,127
	At 01.01.23 £'000	Income £'000	Expenditure £'000	Gains/ (losses) £'000	Transfer £'000	At 31.12.23 £'000
Restricted	0	20	(2)	0	0	18
LITRG Reserve						10
Unrestricted						
General						
Working capital reserve	1,513	0	0	0	164	1,677
Strategic reserve	6,999	10,663	(10,059)	421	(164)	7,860
Designated:						
Disciplinary procedures	300	0	0	0	0	300
Total unrestricted	8,812	10,663	(10,059)	421	0	9,837
Total reserves	8,812	10,683	(10,061)	421	0	9,855

Reserves Policy

As part of the Trustees annual reserves policy review the decision was taken to disaggregate the dual purpose of the historic strategic reserve. The 2024 reserves policy strategic reserve was intended to fund future strategic activity and mitigate unforeseen risk. The revised policy outlines a governance process to make future designations to fund strategic activity. The general reserve is maintained to manage unforseen risk. To make the purpose of the Institute's reserves more transparent, the strategic reserve has bene renamed risk reserve.

The purpose of the charity's funds are as follows:

Unrestricted General fund

The general 'working capital reserve' is intended to be equal to two months of the Institute's annual operating expenditure. The risk reserve is intended to equal 75% of the annual amount of the principal sources of income for the Institute, namely its membership subscription income and income from its education activities. Neither general fund has been designated for specific purposes, allowing the funds to be spent as the Trustees see fit in pursuit of the Institute's charitable objectives.

Restricted funds

The restricted funds relate to a donated legacy. The grant has been given to the CIOT in recognition of a past employee's long service in supporting those on low incomes with tax and related welfare problems. The funds are restricted and to be only used according to the objectives set by the donor.

The disciplinary procedures fund is designed to be used to cover the unpredictable future costs of investigations and disciplinary hearings by the Taxation Disciplinary Board.

15. Analysis of net assets between funds

	Restricted Fund £'000	Unrestricted Fund £'000	Designated Fund £'000	2024 Total £'000
Tangible Fixed Assets	0	339	0	339
Intangible Fixed Assets	0	695	0	695
Investments	0	6,125	0	6,125
Cash on short-term deposit and at bank	18	6,047	300	6,365
Other net current (liabilities)	0	(2,627)	0	(2,627)
Creditors falling due after more than one year	0	(236)	0	(236)
Provisions for liabilities	0	(534)	0	(534)
Total 2024	18	9,809	300	10,127

	Restricted Fund £'000	Unrestricted Fund £'000	Designated Fund £'000	2023 Total £'000
Tangible Fixed Assets	0	372	0	372
Intangible Fixed Assets	0	887	0	887
Investments	0	6,358	0	6,358
Cash on short-term deposit and at bank	18	3,396	300	3,714
Other net current (liabilities)	0	(1,240)	0	(1,240)
Creditors falling due after more than one year	0	(236)	0	(236)
Total 2023	18	9,537	300	9,855

16. Provision breakdown

	2024 £'000	2023 £'000
Dilapidations charge Monck Street office	320	0
International indirect tax	214	0
Provisions	534	0

The dilapidations provision represents management's best estimate of the costs to restore their leased head office premises in Monck Street, London, to its previously unfurnished state.

The tax provision relates to GST and VAT in various jurisdictions throughout the world. As more and more jurisdictions review their tax laws, CIOT continue to manage the settlement of any liabilities with the assistance of in-country third party tax advisors.

17. Financial commitments

At 31 December 2024 the Institute had commitments to make future minimum lease payments, in respect of its office lease, under non-cancellable operating leases as follows:

	2024 £'000	2023 £'000
Amounts due: Within one year	388	450
Between one and five years	1,091	1,479
After five years	0	0
Total commitment	1,479	1,929

18. Personnel

All members of staff, with the exception of the two Chief Executives and the Institute's Lay Representative, are jointly employed by the Chartered Institute of Taxation and the Association of Taxation Technicians. The Institute's Chief Executive and Lay Representative are solely employed by CIOT and the Association's Chief Executive, by ATT. All costs are initially disbursed by the Institute and an agreed proportion is attributed to the Association. The total average number of employees, including those jointly employed by both charities, was 94.75 (2023: 88.75). At 31 December 2024, the total number of employees was 95 (2023: 89), a mix of 32 (2023: 28) part-time and 63 (2023: 61) full-time employees, and the number whose salary and benefits in kind fell within the following scales is as follows:

	2024	2023
£60,001 - £70,000	10	5
£70,001 - £80,000	9	10
£80,001 - £90,000	7	5
£90,001 - £100,000	3	3
£100,001 - £110,000	1	1
£110,001 - £120,000	0	0
£120,001 - £130,000	0	0
£130,001 - £140,000	1	2
£140,001- £150,000	1	0
£150,001 - £160,000	0	0
£170,001 - £180,000	1	1
Total staff costs:	2024	2023
	£′000	£′000
Salaries	5,105	4,718
Temporary staff costs	138	278
National Insurance	548	513
Pension costs	506	468

Key management personnel are defined as those with the day-to-day control of running the organisation. At the Institute, those people are Chief Executive Officer, Director of Education, Director of Governance, Director of Public Policy, Chief Operating Officer and the Chief Finance Officer. Their aggregated remuneration in 2024 was £781,330 (2023: £668,398).

The Institute has maintained liability insurance throughout the year to pay on behalf of the Institute or its Council, committee members and staff, any claims for wrongful acts arising out of the conduct of the Institute's business, or committed in their capacity as trustees, committee members, officers and staff. The insurance premium paid by the Institute covering both claims against the Institute and Trustees personally amounted to £23,998 (2023: £17,911).

The Institute operates a defined contribution pension scheme whose assets are held separately from those of the Institute in independently administered funds. The pension cost charge represents staff pension contributions. Contributions paid by the Institute amounted to £506,080 (2023: £467,000).

There was an outstanding pension contribution at 31 December 2024 of £81,401 (2023: £80,694).

19. Donated services and facilities

Institute members and students are encouraged to become involved in the Institute activities and there are over 750 unpaid volunteers on Council, committees, sub-committees, branches and working parties. The Institute is grateful, not only for their generous input, but also to their firms who may ultimately bear the financial cost. It is estimated that around 18,350 volunteer hours were provided during the year. In addition, office space and utilities have been donated for meetings by other organisations, and facilities and administration services have been supplied by the Institute to other tax charities. Staff seconded to the Institute from HMRC contributed an estimated 1,295 hours in the year. The value to be placed on these resources cannot be reasonably quantified and measured and is not therefore recognised in the statement of financial activities.

20. Related Party Transactions

The Trustees of the Institute are members of Council, who are drawn, from time to time, from the membership of the Institute. No members of Council received any remuneration or benefits-inkind for their duties as Trustees (2023: £Nil).

Members of Council are reimbursed for travelling and other expenses whilst engaged on the activities of the Institute. In the year ended 31 December 2024, 9 Council members reclaimed reimbursement of expenses totaling £15,764 (2023: 7 Council members: £6,299).

Under article 8(2)(b) of the Charter, a minority of Council members may receive payment for delivering lectures or writing articles on taxation matters on behalf of the Institute. Any payment must be approved by the non-conflicted trustees agreeing that securing the trustee's services is good value and in the best interests of the charity. Payment to one Council member (John Barnett) for services rendered to the Institute during 2024 totalled £1,800 VAT inclusive. (No trustees were paid in 2023.)

Council members are obliged to pay annual subscriptions due to the Institute and are entitled to take advantage of the services offered by the Institute, on the same terms offered to all members, or to the general public.

The Association of Taxation Technicians

The total allocation of costs incurred by the Institute to the Association for the year is £1,814,057 (2023: £1,777,603) and there was a balance due to the Association at the balance sheet date of £468 and a balance due from the Association at the balance sheet date of £159,660 (2023 amounts due from the Association to the Institute: £188,246).

The Taxation Disciplinary Board

The Institute's contribution to costs in the year was £140,716 (2023: £161,776). The amount due to the CIOT at the balance sheet date was £129,316 (2023: £144,129).

21. Contingent Liability

There are no contingent liabilities in 2024. Reliable estimates have been determined for all known liabilities.

We did it! We are now 20,000 members strong.

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