

## THE DISSERTATION ROUTE TO FELLOWSHIP

### GUIDANCE NOTES FOR CANDIDATES

#### Introduction

Candidates for Fellowship will already have proved their technical competence in UK taxation either through passing the CTA examination or because of their contribution to the profession over a number of years.

These guidance notes are intended to clarify the requirements for the presentation of a dissertation which are laid down in the Fellowship Rules. They aim to indicate those matters for which dissertation reviewers will be searching, to summarise the main faults in dissertations which have so far proved unsuccessful, and to list the steps in approaching the preparation of a dissertation which the Council considers may increase the likelihood of a candidate's success.

#### Choosing a topic

The primary questions to address are:

“what aspect of taxation really interests me?”

“does it provide sufficient scope for a 10,000 - 25,000 word dissertation?”

Although candidates will often choose aspects of taxation in which they have considerable practical experience, dissertations based purely on academic research will be equally acceptable.

Your topic may be concerned purely with UK taxation, UK taxation policy and practice or it may be more wide ranging. Whilst your topic may deal with international tax issues or general issues of tax policy it is important that you relate your subject matter to the UK tax system. For instance, if you wished to write about tax systems in emerging economies it would be expected that you would include passages on the UK system of giving double tax relief, including tax sparing clauses in UK tax treaties.

#### The question of “originality”

A key requirement for success is that your dissertation contains a high degree of originality. The nature of the concept of originality means that it is impossible to specify what constitutes it but by way of illustration, originality may be achieved in one or more of the following ways:

- By drawing on your personal professional experience
- By drawing together for the first time diverse sources of information on a particular topic to present a coherent treatment of the subject
- By relating an aspect of taxation to wider legal, political, economic or ethical considerations

The key test that will be applied is whether or not the dissertation treats the chosen topic in a way not previously published.

There is no bar to choosing topics on which dissertation have previously been submitted provided these guidelines are adhered to. For instance, dissertations on taper relief could range from an examination of the difficulties with the concept of “business assets” to an examination of the underlying aims and effects of taper relief as opposed to, say, indexation allowance.

### **The importance of critical analysis**

It necessarily follows from the requirement for originality that your dissertation will contain a high degree of critical analysis. This must be distinguished from descriptive content. Whilst some descriptive content will be necessary, e.g. for explanation of the current/previous legal position, the critical analysis should provide, inter alia, commentary on and critique of the current/previous legal position and HM Revenue & Customs’ official interpretation and your own opinions (and recommendations if appropriate). Dissertations consisting of mainly descriptive content are less likely to succeed than ones with a high level of critical analysis based on the thorough research into your subject matter.

### **Breadth versus depth**

The requirement for a high degree of critical analysis means that your dissertation is more likely to succeed if it covers a narrow area in depth rather than a broad area superficially. This does not mean that you need to limit yourself to only a few sections of UK tax law; for instance, if you wished to write on taxation in Eastern European economies you would be advised to limit your dissertation either to one particular country (drawing comparisons with the UK tax system) or one particular tax, e.g. VAT or even one or two aspects of a particular tax, e.g. VAT on e-commerce on Eastern European economies.

Your dissertation should be a comprehensive treatment of its topic meaning that all relevant taxes need to be analysed, unless your dissertation topic has been carefully defined to exclude them. Where appropriate, consideration of the relevant aspects of other areas of law or accountancy should be included.

### **Technical accuracy**

Whilst the Institute holds technical accuracy in high regard, it is acknowledged that some dissertations will be written by candidates with particular experience of the Revenue’s interpretation of various provisions and that theses are likely to be concerned with provisions where the interpretation is contentious. Hence the dissertation reviewer will not be expected to agree unreservedly with every technical point made.

The Institute believes that there will always be room for a divergence of view as to the interpretation of statutes and case law and it wishes to encourage discussion of the meaning of that law. Candidates are therefore encouraged to show how parts of the law can be subject to different interpretations but would be expected to point out where they are taking a position or drawing a conclusion which may be challenged by the Revenue. Provided that conclusion is well reasoned, candidates will not be penalised if the reviewer happens to hold an opposite personal view.

### **Dissertations on tax planning issues**

If a dissertation takes as its topic issues in UK tax planning then it is important that the commercial aspects of the planning points and practical considerations in their implementation are considered. Relevant examples and illustrations would be expected together with due consideration of the accounting and legal considerations of the planning strategies being put forward.

Reviewers in general will be impressed by a dissertation making points that are of practical application and dissertation writers concentrating on planning topics should bear this in mind. Even where the thrust of a dissertation is a highly technical analysis of a very narrow area of tax law, the reviewer will appreciate a text which demonstrates how the reader would utilise the points being made.

### **Changes in the law during dissertation preparation**

The dissertation should specify at the outset the date of the law on which it is based. If the dissertation deals with specific points of UK law which are subject to change during the period of dissertation preparation then the following guidelines will apply;

- Changes which are announced more than one year preceding submission date of the dissertation should be fully dealt with in the body of the dissertation.
- Changes announced within the period of one year before to three months immediately preceding submission date of the dissertation should either be fully dealt with or else the dissertation should contain a short chapter explaining the impact of the changes on the dissertation content.
- Changes in the three months immediately preceding submission date of the dissertation need not be dealt with.

The date of “announcement” for these purposes means the date of the relevant HM Revenue & Customs or Treasury press release.

### **Assistance with your dissertation**

You are strongly advised to ask colleagues with appropriate knowledge to critically review your dissertation at various stages including proof reading at the final stage before submission. You may benefit from:

- Advice on choice of topic regarding scope and availability of source materials
- Advice on the structure of your dissertation

- Suggestions for reading and researching your topic
- Commentary on the amount of and the quality of your critical analysis and the degree of originality
- Commentary on the style and quality of English
- Suggestions for paring down your dissertation to relevant parts where it has grown too large
- Moral support

University tutors may be able to provide some assistance to you under a private arrangement.

### **Steps in the creation of a dissertation**

Candidates may find the following summary helpful.

#### **Selection of topic**

See comments above. Initially, a working title should be used which may be refined later.

#### **Definition of the topic**

Once the general area of the topic has been chosen, you should decide exactly what the scope of your topic should be, bearing in mind the comments above on breadth versus depth. The more precisely you define your topic at this stage, the more focused your research will be, avoiding unnecessary effort in researching materials which will later be discarded.

#### **Collection of source materials**

Your dissertation is intended to be a work of scholarship and this requires painstaking research into your chosen area, encompassing some or all of legislation, case law, books, UK and international journal articles and web sites, professional correspondence and files and unpublished work such as CIOT or university theses. In a dissertation on a more academic as opposed to a practical topic it would be appropriate to include a formal literature review so that the reader is aware of the volume and nature of materials available which are relevant to your topic.

#### **Planning the structure of your dissertation**

Whether your dissertation is firmly rooted in the practicalities of UK tax or whether it is on a more esoteric academic theme you should write down the primary objective of your dissertation. Perhaps there is a question on which you wish to reach a conclusion. Perhaps you are going to perform a comparative study of an aspect of the UK system with that of another country. Perhaps there is an assertion which you wish to try and prove.

Making a list of criteria to be used in answering your question/making your comparison/proving your assertion will greatly assist in providing your dissertation with a logical and rational structure. For instance, if making a comparative study between the property taxes in the UK and in another country, what will be

your points of comparison for your analysis? Fairness? Simplicity? Effect on the housing market? Effect on business expansion? etc.

Having done this, you should then be in a position to sketch out a skeleton plan of your dissertation with chapter headings and approximate word allocations, taking care to allocate properly between descriptive and analytical material. Remember that it may be more appropriate to locate larger tracts of descriptive material in appendices if they are relevant to your dissertation but do not contribute directly to your analysis.

### **Writing up**

You may find it difficult to start. However, rest assured that once you start you will find it even more difficult to finish! This is a personal choice but some candidates may find it easier to start with descriptive sections or by preparing practical or numerical examples rather than plunging straight into analysis.

### **Hanging on to your good ideas**

It is a fact of life that the best and most original ideas often come to us when the brain is in a state of relaxation – free thinking time. This is rarely at work and only sometimes when we sit ourselves down for a “creative” session but more often happens in the car, the bathroom, or just before you go to sleep. Keep a notepad handy at all times.

### **Conclusions**

A successful dissertation will contain well-argued conclusions which are supported by preceding analysis and descriptive materials. Your conclusions should form a substantial part of your dissertation rather than being confined to a few sentences at the end.

### **Presentation**

The **TITLE** of the project and **YOUR REFERENCE NUMBER** must be on the front cover. Your name should not appear anywhere on any of the copies.

The dissertation must be typed using Calibri, Ariel or similar typeface in 12 point on one side only of A4 paper. Double spacing should be used in typescript. Margins should be provided as follows:-

Left (binding edge)	40 mm
Other margins	20 mm

### **Binding**

All copies are to be bound. Simple comb binding is perfectly acceptable.

### **Page Numbering and Contents page**

Pages are to be numbered throughout the whole work. A contents page should appear at the front of the work.

**Soft copy**

As detailed in the Rules (Rule 16.), in addition to four hard copies the dissertation must be submitted as an electronic copy to: [education@ciot.org.uk](mailto:education@ciot.org.uk)

The Institute reserves the right to use plagiarism software.

**Referencing**

As detailed in the Rules (Rule 7.), a recognised referencing system should be used.