

**HMRC Consultation – Improving the data HMRC collects from its customers
Response from the Low Incomes Tax Reform Group (LITRG)**

1. Executive Summary

- 1.1. Data collection should not just be about ensuring compliance and minimising the tax gap – it should also be a means of improving the taxpayer experience. We recognise that smarter use of accurate data has the potential to do this. Use of data that results in HMRC assisting taxpayers to benefit from the reliefs, allowances and deductions they are entitled to will also help to build taxpayers’ trust in HMRC and the tax system, and improve compliance.
- 1.2. We recognise that there can be benefits from HMRC gathering additional data relevant to taxpayers’ tax liabilities. However, we have concerns that HMRC currently gather data that they do not use as best they could. Although we accept there are sound arguments in some cases for gathering more data, in general we think the starting point should be for HMRC to focus on making best use of data they already collect. In relation to some of the areas noted in the consultation, we do not feel that the arguments for collecting the data are robust or clear enough to justify the burden on taxpayers that would result. The focus of the consultation seems to be purely on increasing rather than improving the data. There are a number of data categories already collected where improvement would rely on cleansing and checking rather than collecting more data.
- 1.3. In relation to most of the options, the foremost argument for collecting the extra data is to assist the government in other areas of policy, rather than tax. In some cases, there does not appear to be a clear rationale for the collection of the data for tax purposes. We would welcome clarification as to whether HMRC are the appropriate body to collect and use the various types of data included in the consultation under the General Data Protection Regulation (GDPR) and whether it is appropriate to seek to extend HMRC’s powers as suggested in Chapter 3 of the consultation document.
- 1.4. The consultation says that under any of the options chosen, it will be mandatory to provide the data and that penalties will apply if it is not provided. We raise concerns in relation to not providing this data, such as how it will work in respect of paper returns, the penalties that will be in point and whether HMRC have the appropriate resources or expertise to exercise judgement as to whether a piece of data is accurate.

2. About Us

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- 2.1. The Low Incomes Tax Reform Group (LITRG) is an initiative of the Chartered Institute of Taxation (CIOT) to give a voice to the unrepresented. Since 1998, LITRG has been working to improve the policy and processes of the tax, tax credits and associated welfare systems for the benefit of those on low incomes. Everything we do is aimed at improving the tax and benefits experience of low-income workers, pensioners, migrants, students, disabled people, and carers.
- 2.2. LITRG works extensively with HM Revenue & Customs (HMRC) and other government departments, commenting on proposals and putting forward our own ideas for improving the system. Too often the tax and related welfare laws and administrative systems are not designed with the low-income user in mind, and this often makes life difficult for those we try to help.
- 2.3. The CIOT is a charity and the leading professional body in the United Kingdom concerned solely with taxation. The CIOT's primary purpose is to promote education and study of the administration and practice of taxation. One of the key aims is to achieve a better, more efficient, tax system for all affected by it – taxpayers, advisers, and the authorities.

3. Introduction

- 3.1. We welcome the opportunity to respond to this consultation on improving the data HMRC collect from their customers. We have previously set out our views on HMRC's use of data in our response to the Office of Tax Simplification's call for evidence in relation to its third party data reporting review¹ and in our response to HMRC's call for evidence in relation to their tax administration framework review.² We also set out a number of practical steps for HMRC to follow in order to achieve LITRG's principles for the tax system, in our paper, 'A better deal for the low-income taxpayer'.³
- 3.2. Our main points were:
 - HMRC currently make some use of pre-population. While this could be extended in due course, it does raise some questions that are not dealt with satisfactorily at the moment, in particular, how to resolve data gaps and inaccuracies in pre-populated data.
 - We think a key priority should be to review the balance of responsibilities between taxpayer and tax authority considering the use of pre-population.
 - We are concerned that HMRC do not make best use of the data that they already collect.
 - HMRC should collect, use, and share data to help taxpayers get their tax position correct in the first place, rather than after an error has been made. Data collection should not be only

¹ <https://www.litrg.org.uk/latest-news/submissions/210331-office-tax-simplification-third-party-data-reporting-review-call>

² See sections 4.5, 19, 20, 21, 22, 23, 24: <https://www.litrg.org.uk/latest-news/submissions/210712-tax-administration-framework-review>

³ <https://www.litrg.org.uk/latest-news/reports/201204-better-deal-low-income-taxpayer>

or primarily about ensuring compliance and minimising the tax gap – it should be a means of improving the taxpayer experience. In this, we refer to efficiency and simplicity of navigating the tax system, but also to benefiting from all the exemptions, reliefs, deductions and allowances to which they are entitled.

- HMRC must be transparent about the data they collect, use and share. The rights and responsibilities of both the taxpayer and HMRC in respect of that data should be clear – how to check it, query it, challenge it. HMRC should have to respond in a timely manner to taxpayer queries and challenges.
- It is important that taxpayers are not caught between different arms of government (or between HMRC and third parties) in respect of inaccurate or incomplete data. There should be an HMRC-supported escalation route to assist taxpayers in challenging inaccurate data. Otherwise, it can be extremely burdensome for a taxpayer to try to trace the source of an inaccuracy and ensure it is corrected in all places where it is stored. The taxpayer should not have to challenge the accuracy of data in each separate government department where it is held.
- Naturally, increased use of data and sharing of data raises concerns about data security. It is important that taxpayers can trust HMRC to keep their data secure, so there need to be safeguarding processes to eliminate (as far as possible) the chances of data being shared with the wrong taxpayer.

3.3. In its summary, the consultation provides the following reasons for wanting to improve the range of data used:

“We want to ensure that the data we hold gives us an accurate and up to date picture ... to help build a trusted, modern tax administration system and improve government policy making.”⁴

We think that smarter use of data has the potential to improve the taxpayer experience with HMRC, and we support the principle of using data collected from customers (and third parties) to this end. Use of data that results in HMRC assisting taxpayers to benefit from the reliefs, allowances and deductions they are entitled to will help to build taxpayers’ trust in HMRC and the tax system and improve compliance.

3.4. We recognise that there can be benefits from HMRC gathering data relevant to taxpayers’ tax liabilities. However, as noted in our response to the OTS, we have concerns that HMRC currently gather data that they do not use as best they could. Although we accept there are sound arguments in some cases for gathering more data, in general we think the starting point should be for HMRC to focus on making best use of data they already collect. In relation to some of the areas noted in the consultation, we do not feel that the arguments for collecting the data are robust or clear enough to justify the burden on taxpayers that will result. In addition, the consultation refers to *improving* the data collected; however, the focus seems to be purely on *increasing* the data. There are a number of

⁴ <https://www.gov.uk/government/consultations/improving-the-data-hmrc-collects-from-its-customers/improving-the-data-hmrc-collects-from-its-customers#summary>

data categories already collected where improvement would rely on cleansing and checking rather than collecting more data.

- 3.5. In relation to most of the options, the foremost argument for collecting the extra data is to assist the government in other areas of policy, rather than tax. In some cases, there does not appear to be a clear rationale for the collection of the data for tax purposes. For example, in relation to location data, the consultation states, “Better location data would help HMRC and HM Treasury to design tax policy in a way that supports levelling up and enable greater policy flexibility.” This does not appear to be a very robust argument for HMRC to collect the data proposed. We would welcome clarification as to whether HMRC are the appropriate body to collect and use the various types of data included in the consultation under the General Data Protection Regulation (GDPR) and whether it is appropriate to seek to extend HMRC’s powers as suggested in Chapter 3 of the consultation document. We would point to Article 6 of the GDPR in particular, in relation to the lawfulness of processing. We have concerns as to whether HMRC are the appropriate data controller in many of these cases and as to how consent will be obtained from the taxpayer.
- 3.6. An additional concern is that the proposals in the consultation document will, if implemented, place more burdens on HMRC. This reflects a trend over the past few years to add to HMRC’s list of responsibilities, many in non-tax areas, while not providing HMRC with additional resources. This is especially worrying given HMRC service levels have still not recovered from the decline during the coronavirus pandemic. HMRC would need additional resources to ensure that these extra asks do not have an adverse impact on their core role.
- 3.7. While data can certainly help in understanding taxpayers or identifying issues, we think it is also important to recognise that quantitative data alone cannot provide a comprehensive picture. In addition, if data is misinterpreted or used incorrectly it may result in misunderstanding.
- 3.8. Significant issues arise when data is incorrect. For example, claimants of universal credit can find their awards are ended incorrectly or payments reduced if RTI earnings data is incorrect and indicates a higher income than they actually received, or shows incorrect payment dates. It is essential that there is an effective and accessible route for taxpayers to challenge data and ensure that it is corrected in a timely manner. This is especially the case when incorrect data is shared, as in the example above of RTI data which is used for universal credit claims. Where data is shared, it is important that if it is corrected in the hands of one data holder it is possible to trace other holders of that data to ensure it is also corrected in their hands too. To facilitate this, there needs to be a robust record of ‘data links’ when data sharing takes place.
- 3.9. To provide another example, we are aware of one case of a migrant to the UK for whom RTI data, including the taxpayer’s address, triggered the creation of a Self Assessment tax record. The taxpayer then moved house, and assumed (understandably) that he did not need to update HMRC with his new address, thinking that they would be notified through his employer again. But this did not happen, so he was not aware that HMRC issued notices to file a tax return for the next few years and he accrued late filing penalties as a result. This example also shows how if data is shared between a third party and HMRC, it sets a precedent and expectation in the taxpayer that it is only necessary to update the third party (and not HMRC) in future if that information changes.

- 3.10. The consultation indicates that the options being consulted on are those assessed as bringing the greatest benefits when balanced against potential additional administrative burdens. It would be helpful to understand how these were assessed and whether this information is in the public domain.
- 3.11. The consultation also indicates that all the data would be classified as mandatory. Penalties would be imposed for late or incomplete data. We would question whether it is appropriate to charge a penalty for the late or non-provision of data that does not affect the taxpayer's tax liability. We would also hope that the failure to provide such data would not lead to the whole return being treated as late or incomplete.

4. Across all of the options, we would like to understand which would be the most useful and would offer the most benefit for businesses and taxpayers. Do you think the options for collecting additional data we have prioritised here are the right ones, and are there any other areas where collecting more, better or different data would support tax administration and/or broader public service delivery?

- 4.1. The consultation indicates that under any of the options chosen, it will be mandatory to provide the data and that penalties will apply if it is not provided. It might be possible, from an operational perspective, to mandate the completion of particular boxes on a return where the taxpayer or agent is using software or an online return. However, some taxpayers still use paper returns. How will HMRC deal with a paper return when a taxpayer fails to complete a mandatory box? It is unlikely to be sufficient to include a sentence in the guidance notes to a return. There would need to be a combination of methods used to let taxpayers know that a data field is mandatory.
- 4.2. We think that for areas that are clearly within HMRC's remit, the data that would be most useful to make mandatory would be:
- the data on hours worked and
 - the data on the date a self-employment starts and ends.

This information could (and should) be used by HMRC:

- to ensure national minimum wage (NMW) compliance in the case of data on hours worked and
- to ensure that the self-employed are not underpaying or overpaying Class 2 NIC in the case of the self-employment start and end dates.

5. Q 1: Within this option, should HMRC prioritise improving self-employed data as set above, or another customer segment (for example, employers, companies, partnerships, businesses registered for VAT)?

- 5.1. The self-employed population is already facing a significant amount of change in the coming years, with the introduction of Making Tax Digital, the proposed changes to basis periods and the changes

to the way in which late submission and late payment penalties operate. While we agree that smarter use of sectoral data about the self-employed would assist HMRC in targeting sectors for reliefs or support, we note that HMRC already make use of data to successfully target compliance interventions and One to Many campaigns. We have a concern that requiring this data on a mandatory basis may create a significant additional burden for some self-employed businesses at a time when they are already having to cope with additional burdens and the ongoing impacts of Brexit, the coronavirus pandemic and the fuel price increases.

- 5.2. In relation to self-employment data, HMRC do not currently make best use of the data they have, to the detriment of the taxpayer. This appears to be because HMRC's internal systems do not always 'talk' to each other or match data in the way the general public might expect. One example relates to Construction Industry Scheme (CIS) payments data and the matching of this to subcontractors' Self Assessment tax returns. As noted in our response on the tax administration framework review,⁵ a number of construction industry workers who receive their income under the CIS missed out on receiving government support during the coronavirus pandemic. We, and TaxAid, received queries from CIS workers who had been completing Self Assessment returns (in some cases for several years), but who had declared their CIS income incorrectly as employment income – they are however self-employed. The incorrect categorisation on their tax returns meant they had no declared self-employment profits and were unable to benefit from the Self-employment Income Support Scheme (SEISS). We wrote to HMRC about this issue, but the decision stood that these CIS workers did not qualify for the SEISS. We think some of the responsibility for this falls on HMRC, and this is a clear example of a failure by HMRC to use data in their possession to the benefit of the taxpayer. On receiving a tax return from a CIS worker that places the CIS income in the employment pages, HMRC have sufficient data in their possession to allow them to correct the tax return under s. 9ZB TMA 1970 or open a compliance check. However, although HMRC have the necessary information, their systems do not allow them to easily spot the mismatches.
- 5.3. Another example of where HMRC could make better use of data in their possession relates to the high income child benefit charge (HICBC). HMRC have details of PAYE income through the RTI system. They are also responsible for administering child benefit and have details of any claims made. They could link up these datasets to help identify taxpayers who might be liable to pay the HICBC. This would enable HMRC to contact such taxpayers and prompt them to review their tax position to see if they need to register for Self Assessment and pay the HICBC.
- 5.4. One conclusion to draw from this is that HMRC's IT systems and databases need to allow them to make full and timely use of the data they collect.
6. **Q 2: Are there any areas of the tax system where HMRC's collection of sectoral data could be streamlined or where we could collect this information in a different way? In particular, does your**

⁵ See section 23: <https://www.litr.org.uk/latest-news/submissions/210712-tax-administration-framework-review>

business provide sectoral data to HMRC (or other parts of government) in more than one place (for example, to HMRC through both VAT and Self Assessment; or to HMRC and to Companies House)?

6.1. A taxpayer must provide the business type on form CWF1 when registering their self-employment business for Class 2 National Insurance contributions and Self Assessment.⁶ There are also boxes on the Self Assessment tax return (self-employment supplementary pages) and Partnership tax return for businesses to describe the nature of their business. However, there are space constraints when completing these boxes and this may result in fewer details being given in respect of some trades.

7. Q 3: For taxpayers and their agents: How easy or difficult are SIC codes to use for your business? What would make it easier for your business to find and input your SIC code(s)? What level of SIC would be most appropriate (i.e. three or four digits)? Do you prefer using the full version from the Office for National Statistics, or the condensed version used by Companies House?

7.1. We cannot comment on the ease of use of SIC codes from experience. However, in determining ease of use and the administrative burden for businesses, we would think that it is relevant to consider:

- The number of SIC codes a business has to look through and choose between
- The degree of overlap between different SIC codes, which might make it difficult to select the correct code
- How useful, up-to-date and relevant to the current business environment the SIC codes are (for example, there does not appear to be an option for ‘umbrella companies’, meaning these are currently labelled incorrectly, often as ‘book-keeping’)
- What guidance and support will be available to businesses when selecting SIC codes – we note that the SIC code tool on GOV.UK⁷ appears to be quite user-friendly (for condensed SIC codes), but this will not assist those who are digitally excluded.

7.2. At the end of Chapter 3, the consultation document indicates that if HMRC pursue any of the options in the consultation, this would be classified as mandatory data. So, returns would be incomplete if the relevant data was not included. In relation to the use of SIC codes, we would raise the following concerns with the application of penalties for late or ‘inaccurate’ data:

- To the degree that the choice of an SIC code, particularly a more specific digit, is subjective, we would question the extent to which HMRC have the resources or expertise to determine the accuracy of the data provided. This is a question of not only understanding the application of SIC codes, but also the specific business.

⁶ <https://www.gov.uk/register-for-self-assessment/self-employed>

⁷ <https://resources.companieshouse.gov.uk/sic/>

- If a taxpayer inserts a SIC code in a return, but HMRC disagree, what will be HMRC's approach? As noted in the bullet above, this is arguably a subjective matter, so we do not think an inaccuracy penalty should be in point.
- Equally, if there are no penalties for inaccuracy, just for failing to complete the field, we would question whether the provision of this data will be as helpful to HMRC as the consultation document argues.

8. Q 5: Would you find this information useful, if published in an anonymised form by the government (potentially linked with other datasets, such as salary, qualification or location information)?

- 8.1. As an organisation, we might find this kind of data useful when responding to consultation documents and calls for evidence published by HMRC and parliamentary committees, or when preparing research reports. However, we are not convinced that businesses, employers or individuals will have the time or resource to make use of such data in the way the consultation document suggests.
- 8.2. We can see that it might assist in government policy design.⁸ However, we think it would need to be made clear that the data is not actually being collected for tax purposes but for other purposes.
- 8.3. In addition, we think that while data on occupation is important in understanding the labour market, this needs to be linked to an understanding of other factors. These may not be readily available as occupation data, since they are more subjective. For example, it would be necessary to know people's intentions or attitudes in relation to retirement, relocation, or emigration from the UK. We are not suggesting that this type of data should be collected, as it would undoubtedly place undue burdens on those required to collect and report it, without there being a direct benefit for them. We just think it is important to be clear that the data referred to in the consultation may not be as helpful to HMRC and other stakeholders as the consultation document suggests.
- 8.4. The proposal in respect of employees is that employers / payroll operators provide the data through Real Time Information (RTI), as well as reports when employees join, leave or change occupation. The questions below focus on the burden this would place on the employer / payroll operator. However, we think there is an argument that the employee should have a right to challenge the collection of this data, to ask why the employer should provide this data to HMRC and even to opt out.

⁸ We note that there is some data available on sector, as statistics have been published on the SEISS grants per industry sector. For example, see <https://www.gov.uk/government/statistics/self-employment-income-support-scheme-statistics-october-2020/self-employment-income-support-scheme-statistics-october-2020#seiss-second-grant-by-industry-sector>

- 9. Q 6, Q 7 and Q 8: How easy or difficult would you find it to categorise each of your employees by occupation? If you have used SOC codes previously, how easy or difficult to use, and what, if any, challenges do you find with them? Do you have any suggestions as to how we could modify or design this option in a way that minimises cost burdens? How well do SOC codes describe your, or your clients', occupation? How easy would it be to extract job titles from existing payroll systems into RTI?**
- 9.1. The proposal is not fully developed as to whether job title or a description of the occupation would be required. We would note that job titles often provide little information as to the actual occupation of an employee – their relevant qualification or what their day-to-day duties involve. The allocation of an SOC code based on job title would not always produce an accurate result, rendering the data flawed and unreliable.
- 9.2. If it would be the responsibility of the employer / payroll operator to categorise the employees by occupation and to make use of SOC codes, this could prove difficult. Again, this would be exacerbated where the job title provides no clues as to the actual occupation of the employee. In addition, it cannot be assumed that the Human Resources department or whoever is responsible for categorising the employees understands each employee's role well enough to allow them to allocate the appropriate SOC code. It could also potentially lead to disputes between employers and their employees in relation to descriptions of roles. This would be a particular concern if the categorisation by an employer of their employees determines their eligibility for government support. Will employers be offered support or guidance to deal with queries from employees?
- 9.3. Similarly, it might be possible and even easy to extract job titles for employees from existing payroll systems into RTI, but that does not mean that will result in an accurate description of an employee's role.
- 9.4. In relation to recruitment agencies and umbrella companies, it should be noted that workers can often move around assignments depending on what they are offered. If these workers are simply categorised as agency workers, that does not seem particularly useful.
- 9.5. For the self-employed, to require both occupation data and sectoral data would impose a significant burden. If the self-employed are expected to select both SIC and SOC codes, there is also a risk that they may confuse the two types of code. The mechanics of how the selection of a code could perhaps solve this issue – for example through the use of drop down selector tools if software or an online form is used. But, this will not be able to prevent possible confusion if a paper form is used, or if manual entry is used for software or online forms.
- 9.6. We would hope that if this type of data were collected that it would also be used to develop a system of automatically including uniform allowances, for example, in tax codes or to identify taxpayers who would likely be eligible for a tax refund in relation to professional subscriptions for example. In the latter scenario, a One to Many type campaign could be used to highlight this to taxpayers identified in this way.

10. Q 9: Within location data, is HMRC correct to prioritise improving data on businesses with multiple locations, and on the location of real economic activity?

- 10.1. We note that boxes 3 and 4 of SA103F 'Self-employment (full)' pages ask the taxpayer to provide the first line and postcode of their business address (the SA103S 'Self-employment (short)' pages just ask for the postcode).⁹
- 10.2. The consultation document indicates that this data will enable HMRC to share this data to allow targeting of business rates reliefs for example. Again, we would question whether this falls within HMRC's remit if they are not using the data themselves for tax purposes. We would welcome clarification of the position in relation to GDPR on this aspect of data sharing too. The use of employee data would presumably require consent from each employee for their data to be used in this manner.

11. Q 11: How easy or difficult would it be for your business [or, for agents, your customers] to provide work location information for each employee through RTI?

- 11.1. We think that as businesses likely already have this information, it is probably not generally difficult to gather the information. But if this is implemented alongside various other requirements, it is placing yet another burden on businesses. This will especially be the case for the self-employed person with a small business and a few employees, who is already facing changes such as Making Tax Digital and reform to basis periods.
- 11.2. The proposal may prove burdensome for some employers, however. For example, those whose employment contracts state 'any branch or office' in a region or those businesses that employ drivers – will the work location be the vehicle depot, or indeed in relation to any employee who has no fixed workplace?
- 11.3. It is not clear how this proposal will work in relation to remote workers. There may be a central office and remote workers located across the UK. It is not clear how this data would therefore assist the other government policies, such as 'levelling up', that are mentioned.

12. Q 13: How easy or difficult would it be to provide information on specific hours worked and/or actual hours worked?

- 12.1. We agree that it would be sensible and less burdensome to provide data on contractual hours where those are reasonably stable and specific hours worked where that data is already provided on payslips.

9

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1063747/sa103f-2022.pdf

- 12.2. In relation to non-compliance for national minimum wage (NMW) purposes, we agree that HMRC may require better data on hours worked. The NMW regulations are complex and sometimes difficult to apply. For example, we noted the difficulties that relate to travel time for care workers in a report we published in 2018.¹⁰ Some non-compliance is caused by administrative errors and technical failures. We think it is important that HMRC focus on supporting employers who want to comply. This would free up resources to deal with those employers who are deliberately non-compliant. This data on hours might assist in that regard.
- 13. Q 15 and Q 16: Do you agree that building on the pre-existing definition of a close company is the best approach? Are there any other approaches you would prefer? How great would the administrative burden be for you or your customers in splitting out dividend income from controlled companies and/or determining the percentage of shareholding in that company?**
- 13.1. If HMRC is to collect this data, it would seem sensible to make use of the pre-existing definition of a close company.
- 13.2. The extent of the burden will vary. But for small owner-managed companies, it is possible that there will be little burden, because they will receive dividends only from that one company. The burden of determining the percentage of shareholding may be greater, because there may in some cases be different categories of shares with different rights. HMRC will have to be clear about the actual data they require – for example, if they are concerned about Ordinary Shares only.
- 14. Q 17: How easy or difficult would it be for you/your clients to identify the dates that your business/your client's business started and ended trading within a tax year?**
- 14.1. It is difficult for some self-employed people to identify a precise date that their business started. When an individual sets up a self-employment business, it can often be a gradual process. They may combine planning and starting the business with employment. This can make it difficult to pinpoint an exact date for the start of the trade. In other cases, a trade may have started out as a hobby, or the individual may have been earning some casual income. It may be difficult to identify when the change to a genuine trade carried out with a view to generating a profit occurs. If these boxes are to be made compulsory, then we think guidance would need to be clear, to help taxpayers identify and input the correct date.
- 14.2. HMRC should also make use of this data to assist the taxpayer, by ensuring that they do not underpay or overpay Class 2 NIC. Unless there is any other reason for the taxpayer to complete a Self Assessment tax return, the inclusion of a cessation date for a business should lead to HMRC no longer issuing tax returns to the taxpayer. This does not always happen at the moment. It would

¹⁰ See chapter 4 of our report on the challenges of the tax and benefits system for care workers <https://www.litrg.org.uk/latest-news/reports/180502-care-workers-%E2%80%93-challenges-tax-and-benefits-system>

therefore be good if HMRC would make a commitment to use any data they collect for the purposes of preventing taxpayers getting into difficulty.

LITRG
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