

Specialist Advisor in International Tax Avoidance CT&VAT

Fixed Term Appointment

Job Profile

What You Will Be Doing

You will be working with the Outward Investment team in CT&VAT that leads some of the highest profile tax litigation cases, as well as key legislative and operational tax policy issues. The team have responsibility for a wide range of international tax legislation, including controlled foreign company (CFC) rules, double taxation relief (DTR) and company residence rules. The team work closely on projects with other parts of HMRC including HM Treasury. Key responsibilities include:

- ✓ Advising and working closely with operational and anti-avoidance colleagues on international tax avoidance issues (particularly those involving DTR, CFC and company residence).
- ✓ Identification, selection and preparation of suitable cases for litigation.
- ✓ Advising Ministers on legislative changes to the taxation of foreign profits.
- ✓ Assisting operational colleagues in applying international tax legislation (in particular that involving DTR, CFC and company residence).

About You

Requirements:

You must be CTA, CCAB qualified, Tax Lawyers or have AIT (including paper 4), or equivalent.

You will bring in-depth current knowledge and understanding of the direct tax regime and how it affects multinational businesses on a day-to-day basis. You will, in particular, have in-depth knowledge, understanding and operational experience of the CFC and DTR rules and the issues they present for multinational businesses. You will have the ability to look beyond these specific areas and to analyse complex issues and communicate them clearly and effectively.

You will show clear strength in the following key competence areas:

Understanding Context & Change

- ✓ You think strategically, looking beyond the immediate factors that impact on your work.
- ✓ You take an interest in the wider business strategy - making sense of it and applying it to your thinking about how your area and role might be changing.
- ✓ You think ahead, looking out for developments in policy, your operating environment, issues that affect your business, and consider how they relate to your work.
- ✓ You convey a corporate message consistently and in ways that are meaningful and useful to customers, colleagues and others.

Using Resources, Decisions, Actions To Deliver

- ✓ You seek outcomes which are effective, relevant and achievable.
- ✓ You are decisive and take action to make sure that performance stays on track.
- ✓ You appreciate complex, inter-related issues that affect performance and do not take an isolated stance.
- ✓ You identify when evidence is required and know how to obtain, validate and evaluate it. You use evidence to inform decisions, and understand:
 - ✓ various sources of information,
 - ✓ different types of analysis tool, and
 - ✓ different methods of summarising and presentation.

Working With & Through Others

- ✓ When you negotiate you seek a “win-win” result with sustainable and supported outcomes – pressing your case, making concessions and looking for common ground/shared goals.
- ✓ You are skilled in organising meetings to be productive working events – you are able to focus, structure and facilitate groups working together, for example to reach clear decisions, high levels of engagement, creative outputs.
- ✓ You communicate complex messages in clear and meaningful ways.
- ✓ You use personal presentation skills and styles to suit the occasion and audience. You are aware of the impact and you encourage two-way communication, checking for understanding and reception.

Personal Impact & Influence

- ✓ You are willing to confront difficult situations and so inspire trust and confidence.
- ✓ You take a personal approach to seeing that results are achieved and progress made – you are responsive to problems, you get actively involved and support others to resolve them.
- ✓ You can influence others, for example, by communicating a compelling argument, sharing know-how, challenging and developing them.
- ✓ You listen to others' opinions, and share experience and knowledge.

Location

London

Salary

Pay and grading in HMRC is based upon broad bands.

The starting salary for the roles is £59,243 - £72,747. Flexible starting pay is available across the pay range shown in-line with qualifications, knowledge and skills, plus excellent benefits.

Candidates who already work for HMRC, and staff from other Government Departments, will be paid in-line with HMRC rules for pay on promotion or transfer.