



Foundations

Social Housing Insights

August 2019



Since the last edition of Foundations went to print, a new Prime Minister, Housing Secretary and Housing Minister have all been appointed. Initial indications are that there will be a change in policy towards encouraging home ownership, perhaps with a greater encouragement of rent-to-buy models. The National Housing Federation also reports fruitful discussions with HMRC about continuing the cost sharing exemption for housing associations, which would be welcome. We shall provide further commentary on these developments once we have greater clarity.

While Conservative Party policy on housing may be under review, the Labour Party has published some radical proposals in its *Land For The Many* report. This includes a number of tax proposals, and we examine these.

In the March edition of *Foundations* we reported on HMRC's proposed changes to the taxation of off-payroll workers. More details of the new rules are now available. With most housing associations regularly engaging the services of IT consultants and others who are employed through personal service companies, this is something that organisations need to start addressing now.

The last few months seem to have yielded a new crop of for-profit Registered Providers and we are working with a number of similar organisations seeking this status. We compare the tax treatment of these entities with traditional, non-profit RPs.

There have been some welcome announcements from HMRC confirming that the installation of solar panels will continue to be subject to the reduced rate of VAT, and clarifying the treatment of voluntary board members. Less welcome is HMRC's apparent rowing-back on its initially generous approach to the costs of replacing defective cladding in the wake of the Grenfell tragedy.

What should you do if you suspect a fraud? We have included a flowchart explaining what process to follow.

Finally, at this time of year, many organisations will be thinking about retendering their audit. We have produced a guide on how you can get the most value out of this process.

On Tuesday 10 September we are holding our first social housing conference in Worcester on the topic of growth. Details of the event and how to book are at the end of this publication. We hope to see many of you at this.



Adam Cutler
Director, VAT
National Head of Social Housing
adam.cutler@crowe.co.uk

Land for the many report

Olivia Larson examines the key tax and other changes proposed by the Labour Party to tackle the housing crisis

The Labour Party recently published a report which will inform party policy on housing. The aim of the proposals is to change the way land is used and controlled in the UK so social needs can be met more effectively, the quality of our environment can be enhanced and the communities around us create an empowered, stable, effective economy.

Multiple changes to current tax legislation are proposed in the report, including Stamp Duty Land Tax (SDLT), Council Tax, Capital Gains Tax and Inheritance Tax, as well as introducing new taxes to replace the old ones. The purpose of these changes is to discourage the use of homes as financial assets, reduce taxes in general, and encourage more efficient use of the UK's housing stock.

The report suggests that SDLT unfairly penalises purchasers, who are already struggling to pay high prices for a home. Additionally, it particularly affects those who need to move around more frequently.

Although the report recognises that SDLT has been reduced for those who are buying a first time house, this report proposes to phase out SDLT entirely for people buying homes to live in themselves. It would, however, remain in place for dwellings purchased by 'non doms', companies, and all second homes and investment properties.

It is expected that a property owner will make capital gains as house prices rise. The report notes that investing in land and property has long been a part of the UK's history and had been the primary source of taxation in the UK; but the focus of taxation is now on income and expenditure (e.g. VAT). Today, Income Tax is often far higher than Capital Gains Tax creating an uneven distribution of wealth for people who are in the labour force and people who invest in property. The report recommends the rate of Capital Gains Tax be increased to match Income Tax rates to encourage people to seek more productive and socially beneficial ways to invest their money.

In 2015, the Chancellor of the Exchequer announced a new transferable main residence allowance which raised the tax-free allowance from £325,000 to £500,000 per person for estates that include a house. The report suggests that these changes to Inheritance Tax have further enhanced the tax treatment of housing, compared to other assets. This is seen as another example of the tax system providing a significant distributional advantage for homeowners who benefit from rising house prices compared to those who can only afford to rent. In the long term, Labour proposes to abolish Inheritance Tax and replace it with a lifetime's gift tax levied on the recipient. Gifts received above the lifetime allowance of £125,000 would be taxed at the same rate as Income Tax. The Resolution Foundation estimates this would raise £15 billion over the next two years which is £9.2 billion more than the current inheritance tax system.

Introducing a progressive property tax has been suggested to replace Council Tax which is viewed as regressive and unpopular. The progressive property tax would be payable by owners and not tenants. It would be based on regularly updated property values that are set nationally rather than locally. The tax would be significantly higher on second homes and empty homes in order to encourage a more effective use of housing stock. Further benefits cited from these changes are administrative savings, lower levels of arrears and less court action.



Away from tax, the report also proposes returning power back to local authorities who should be able to

- set their own planning application fees above a national minimum
- set housing targets based on identified local housing needs
- be supported to assemble and prepare sites for development
- government to remove permitted development rights that allow office and agricultural buildings to be turned into housing without the need to apply for permission.

In addition, the report proposes a better balance between the market, state, household and commons. Information about land ownership, control, subsidies, and planning, to be published as open data including a fully public (and free) register of all charges and options over land titles. This will allow a production of new National Statistics

relating to land ownership, control and use, to inform policy.

What should housing associations do?

Such substantial changes to the tax system would take any government some time to implement. However, there is broad agreement across the political spectrum that the way property is taxed is no longer fit for purpose and we do expect future governments, of whatever make-up, to propose some significant tax changes to rebalance the housing market.

Registered Providers and other charitable landlords enjoy a number of reliefs at present from property taxes, and it will be important for the sector to lobby to the keep these valuable reliefs from any new taxes. The tax system also affects the affordability of various home ownership products offered by housing associations, and they need to be alive to how any changes proposed will affect this.



Olivia Larson
Executive, VAT
olivia.larson@crowe.co.uk

Off payroll working

How will the new rules affect you?

Caroline Harwood and Simon Herbert discuss HMRC's latest announcement on off-payroll working

On 11 July 2019, HMRC released its response to the consultation "Off payroll working rules from April 2020" together with the draft clauses for inclusion in the Finance Bill 2020. The new rules will require private sector organisations which engage workers via a Personal Service Company (PSC) or other similar intermediary to undertake checks to determine whether the worker should be treated as an employee or as self-employed for tax purposes. If the tests indicate a relationship which is more akin to employment, it will be the client's responsibility to operate PAYE and NIC on payments made to the PSC. Previously the onus to do so lay with the PSC but in HMRC's view fewer than 10% of such organisations actually complied with their responsibilities, and estimate that the tax cost could be as much as £1.3 billion in 2023/24.

These rules already apply to engagers in the public sector but they also need to be aware of the changes brought in by the new rules which will apply to all medium and large organisations in the UK.

Four key areas have been subject to consultation and the recent announcement bring clarity if no surprises.

1. Size of organisations to which the new rules apply

Only companies which are not "small" as defined by the Companies Act 2006 will be subject to the new off payroll working rules. The same rules apply for community benefit societies and other incorporated entities. "Company" hereafter should be read as included these entities. For housing groups, the entire group needs to be considered for these tests. A small company must meet two of the following qualifying conditions:

1. Annual Turnover not more than £10.2 million
2. Balance sheet total not more than £5.1 million
3. Number of employees not more than 50.

If these are not met in 2 consecutive years the company will cease to be small and must apply the new off payroll working rules from the start of the tax year following the filing date when the company is no longer small.

For unincorporated organisations, HMRC has taken on board the need for a straightforward test and those organisations whose turnover exceeds £10.2 million in one **calendar year** must operate the off payroll working rules from the start of the following tax year. This will mean that unincorporated organisations will need to keep detailed records of turnover per calendar year, even if this differs from the period over which they draw up their accounts which will mean a further administrative burden.

2. Provision of information

The new rules will require clients to pass details of their status determination and the reasons for that decision down the contractual chain to each party (which could include one or more agencies, say as well as the PSC) as well as directly to the worker. This will mean that every medium and large organisation in the UK will need a procedure in place to make status determinations and to pass that information to the worker and the fee-payers in that chain. It will be important for companies to consider how they deal with any data privacy issues arising from this new process.

3. Dealing with non-compliance

This has been perhaps the most contentious area in the new rules as it is proposed that if the PSC or any other party in the labour supply chain fail to account for PAYE/NIC the liability will pass to the client as end user. Many believe that this is an unfair burden on the client when they may have taken every step necessary in order to operate the new rules correctly. HMRC have noted this and while the new legislation will pass the liability up the line, we are promised guidance on circumstances when HMRC will not seek to recover from the end user. We await this guidance with interest as many clients would prefer the protection of law from unexpected and potentially unrecoverable liabilities.

4. Dealing with disagreements

It is clear that there will be cases where the worker and the client disagree with the client's determination of status. HMRC have rejected the suggestion that they should be involved in resolution suggesting that the worker and client are best placed to assess the facts and that there is no evidence to

suggest that a blanket approach to status determinations will be taken by clients. As an aside, one does wonder how HMRC's already stretched resources could have taken on this additional burden and HMRC state that they believe that medium and large organisations will have both the resources and expertise available as well as an incentive (see 3 above) to make accurate determinations. This hot potato has been firmly placed in the hands of the client.

Clients will therefore need to put in place a robust "status disagreement process" and must respond to representations from workers within 45 days where there is a disagreement over determination. Clients which fail to respond will be liable for the tax and NIC in point. HMRC have promised guidance on how clients will fulfil their obligations to take reasonable care and how to implement a status disagreement process. This is promised before the legislation takes effect but clients should start now to think about how their process will look.

5. Other matters

HMRC have rejected proposals for tax and NIC relief for payments made by engagers into an offpayroll worker's personal pension plan and no action will be taken to align the employment law definitions of status with those used for tax purposes citing the need for careful consideration in order to avoid unintended consequences. The story remains the same with regard to the "Check Employment Status for Tax" tool (CEST) which is intended to help clients with their status determinations, but CEST still fails to win the confidence of its intended users, particularly in light of HMRC's failure in recent tax tribunal cases to apply the status tests correctly.



Finally, HMRC promise that a programme of education and a support package will be released in Summer 2019. However we would encourage all organisations to take action now rather than to wait to evaluate the workforce and current policies, assess the level of risk and put procedures in place to ensure that they can comply with the new rules.

For more information please refer to Crowe's ongoing support programme for those impacted by IR35 changes in the run up to April 2020 or contact Caroline Harwood or Simon Herbert with any questions or to discuss our risk assessment reviews and training programmes.



Caroline Harwood
Partner
Head of Employers Advisory Services
caroline.harwood@crowe.co.uk



Simon Herbert
Director, Employers Advisory Services
simon.herbert@crowe.co.uk



Do for-profit RPs get tax breaks?

Adam Cutler examines the difference between the tax treatment of for-profit and non-profit registered providers

It seems that every week recently there is news of another for-profit RP being created.

As discussed in *Social Housing* magazine, these are being created for three main reasons:

- housebuilders deciding to set-up their own captive RP
- build-to-rent specialists which need an in-house RP to access grants and/or fulfil planning obligations
- investment vehicles attracted by the security of RP income models.

Whatever the reason, there are some that will question whether it is right that a for-profit company should have access to benefits originally intended for non-profit organisations.

So do these benefits enjoyed by for-profit RPs extend to beneficial tax treatments? The answer is a mixed bag.

Most of the main tax breaks that non-profit RPs enjoy actually have nothing to do with their RP status.

Firstly, most (although certainly not all) non-profit RPs are accepted by HMRC as having charitable status. This includes community benefit societies which have adopted charitable rules as well as registered charities. These bodies do not pay corporation tax on their surpluses generated from investment activities (which includes property rental) or trading activities that fall within their primary charitable purposes (which normally covers development for shared ownership). As directors of charitable RPs will know, this status has to be monitored carefully. Many have had to set-up trading subsidiaries to undertake activities that would fall outside of their charitable objects, particularly development for open market sale.

Although there is no tax to save, charities are normally exempt from the requirements of the Construction Industry Scheme (CIS), which saves some paperwork. Charities can claim exemption from stamp duty land tax (SDLT) on property acquisitions, although only to the extent they will use the property for charitable purposes. Charities also benefit from some VAT reliefs, such as VAT-free advertising and works to make properties more accessible for disabled tenants – although getting suppliers to apply these VAT rules in practice is another matter. So clearly a for-profit RP will not enjoy any of these tax reliefs for charities.

However, the main VAT benefits that RPs enjoy are available to any residential property developer or investor. Residential rents and service charges are exempt from VAT regardless of the identity of the landlord.

Most costs of constructing new homes should be VAT-free, and some works to change the layout or thermal efficiency of buildings can be subject to only 5% VAT.

So what tax reliefs are available only to RPs (and RSLs in Scotland and Wales, and RHAs in Northern Ireland)?

If a traditional RP acquires land using some grant; from another RP, a Housing Action Trust or a local authority; or if the acquirer is a tenant-controlled RP, it is able to claim exemption from SDLT (still known as 'RSL relief'). These rules were updated by the Housing and Regeneration Act 2008 so that a for-profit RP can also claim SDLT exemption where the purchase has some public subsidy.

From a VAT perspective, the unique opportunity open to RPs is when it is acquiring land for development where the vendor has exercised the option to tax and would normally have to charge 20% VAT.

An RP can provide a certificate to the vendor confirming its status and intentions, and the sale becomes exempt from VAT. Converting non-residential buildings into residential use is also VAT-free when provided to an RP. With effect from 1 October 2019, it is proposed that certain energy saving works will be subject to 5% VAT when provided to an RP, but not to other landlords. All of these VAT reliefs are available to any organisation listed on the Regulator of Social Housing's list that is not a local authority, so a for-profit RP will also benefit from these VAT reliefs.

Conclusion

If the government has decided that for-profit RPs should be given grant, it makes little point taking this away again in SDLT. As for the VAT benefits, most for-profit RPs are unlikely to avail themselves of them at the time being, as they will be acquiring completed properties from associated companies or third parties rather than developing themselves. If for-profit RPs begin developing on a scale approaching some non-profit RPs, it will be interesting to see whether the government allows them to keep this favourable treatment.

This was first published in Social Housing magazine in May 2019.



Adam Cutler
Director, VAT
National Head of
Social Housing
adam.cutler@crowe.co.uk

Finance Bill 2020

Income Tax and the treatment of expenses for voluntary office holders

Caroline Harwood welcomes confirmation of the treatment of voluntary board members

What is the change?

Long standing practice has been that no tax charge arises on the payment or reimbursement of reasonable expenses provided to voluntary office holders provided these are not in the nature of a reward. This puts the officers on the same basis as other volunteers.

New measures are being introduced in the Finance Bill 2020 to put this treatment on a statutory footing rather than relying on the current concessionary basis.

The certainty this new legislation will bring is very welcome but no day to day impact will be felt by voluntary office holders or the organisations where they work as the treatment of their expenses should not change.

Who is affected?

HMRC state that the total number of voluntary office holders is unknown.

But we do know that alongside the 11,500 special constables and 21,500 magistrates in the UK who are voluntary officers, there are also office holders in other parts of the voluntary sector which includes 168,000 registered charities and 7,000 Community Amateur Sports Clubs. The number of individuals holding a volunteer position in a political party is unknown.

What is a 'volunteer office holder' for these purposes?

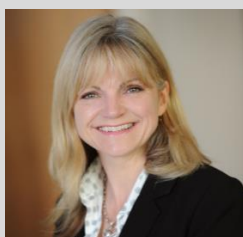
There is no definition of volunteer office holder in the new draft legislation. Therefore we look to the case law tests which define an officer for general purposes.

The basic definition of an office is a 'permanent, substantive position which has an existence independent from the person who fills it, which is filled by successive holders' subject to the proviso that the proviso that a post need not be capable of permanent or prolonged existence but it must have endurance, at least, beyond the tenure of one man.

Volunteer offices include magistrates, elected trade union secretaries and special constables in the police force, for example.

What is our view?

We can only welcome a change which puts a concessionary beneficial treatment into law, giving certainty to all parties.



Caroline Harwood
Partner
Head of Employers
Advisory Services
caroline.harwood@crowe.co.uk

VAT reliefs on replacement cladding

Following the Grenfell tragedy many organisations are replacing the cladding on their buildings. In some circumstances these works may qualify for VAT reliefs. However, HMRC's policy in this area is hard to find and has been narrowing in recent weeks writes Adam Cutler.

Since the Grenfell tragedy housing associations and other residential landlords have been urgently reviewing their properties to see whether their own cladding needs replacing. Where remedial work is required, HMRC has now confirmed that this may be eligible for VAT reliefs in certain circumstances.

When should contractors not charge VAT?

Where the property owner commissioned the construction of the building, and the original cladding was part of this construction process, then the remedial work can be treated as snagging. These services would be zero-rated.

Works to replace defective cladding can be zero-rated if they qualify as snagging works. Clearly these works will normally be many years outside of the normal period for snagging defects; the building will have been signed-off as completed and any retentions would have been paid to the builder. However, HMRC implies in most recent guidance that it is relaxed about the time lapse.

What evidence will HMRC want to see?

In order to be zero-rated, HMRC needs to be comfortable that the works can be seen as part of the construction process. In order for this to be the case, HMRC has stated it expects: -

- the defective cladding was part of the original construction of the building. HMRC implies it will expect to see copies of the original plans showing the cladding in situ
- the property still needs to be owned by the organisation that commissioned its development; and it is this organisation which organises the replacement of the cladding. Many stock transfer housing associations, and large groups that have been through various corporate rationalisations might find this removes several of their properties
- the cladding is being replaced because it is faulty or defective. This might seem obvious, but organisations erring on the side of caution may face challenges.

In its most recent guidance, HMRC has stated it would not expect recladding works to be zero-rated in the majority of cases.



What if the cladding was installed after the property was built?

Where the cladding was installed as part of a conversion project, then again the remedial work could be treated as snagging if the property owner has not altered. This work might be subject to 0% or 5% VAT, depending on what rate applied to the original conversion works.

HMRC has also accepted that re-cladding works may qualify for the 5% VAT rate in other cases where the cladding's main purpose is to insulate the building, rather than to enhance its looks.

What about other buildings?

Understandably, most of the discussion post-Grenfell has focused on other tower blocks. However, other buildings do have cladding on them that may need to be replaced.

Although the position is more complex, similar VAT reliefs may apply to works to:

- low rise blocks of flats
- flats above shops
- houses
- community centres
- halls of residence
- care homes.

Communications

Crowe understands that HMRC is not planning to publish any guidance on these issues. These policy changes have been confirmed in official records of meetings with sector representatives, as well as a number of individual rulings we have seen.

While HMRC's policy appears not to have altered over the last few months, the tone of the most recent guidance is disappointing. With the second anniversary of the Grenfell tragedy just passed, pressure is mounting about the slow pace of remedial works and many organisations face significant bills for these vital works. Placing additional obstacles in the way of contractors charging without VAT, where they are entitled to, is unhelpful.



Adam Cutler
Director, VAT
National Head of
Social Housing
adam.cutler@crowe.co.uk

Do you suspect a fraud has occurred?

The initial stages of a fraud investigation are incredibly important. Organisations that fail to observe the correct protocols are likely to encounter significant problems.

Doing the wrong thing, however well-intentioned, may prevent discovery of what happened, recovery of losses, remove the full range of sanctions available, and leave an organisation open to legal claims under data protection, human rights and employment law.

If you suspect a fraud is underway, before you do anything, speak to a professionally qualified counter fraud specialist.



Jim Gee
Partner
Head of Forensic Services
jim.gee@crowe.co.uk

As soon as there is a suspicion of fraud which is substantiated by at least one reliable piece of information...





Get professional counter fraud advice. A quick phone call as soon as you suspect something will help avoid costly mistakes.

Assume there is necessarily sufficient expertise in the organisation. Most organisations have little if any counter fraud expertise.

Refer for specialist investigation as soon as there is a suspicion of fraud which is substantiated by at least one reliable piece of information.

Assume there is an innocent explanation for suspicious activity/transactions. Start investigating until you have sought specialist advice.

Leave all response and recovery options open. An investigation may reveal the fraud is much bigger than initially suspected.

Decide on a response and recovery option before an investigation has revealed the nature and extent of what has happened.

Securely preserve electronic evidence. Lock devices away somewhere secure.

Access electronic evidence, such as computer files, phone records, etc.

Make a note of individuals that may be involved.

Approach individuals that may be involved.

Leave suspected parties in post while investigations continue, unless there is a risk of significant ongoing financial losses.

Suspend people who may be involved before an investigation concludes, unless there is a risk of significant and ongoing financial losses. People aware of investigations may attempt to obscure the truth.

Establish a small and confidential working group to contribute to a future investigation.

Assume there is necessarily sufficient expertise in the organisation. Most organisations have little if any counter fraud expertise.

Ensure those undertaking an investigation have the necessary counter fraud skills, expertise and experience.

Assume there is necessarily sufficient expertise in the organisation. Most organisations have little if any counter fraud expertise.

A good procurement process – the do's and don'ts

Guy Biggin and Jonathan Beasley discuss best practice when going out to tender for audit services.

The annual audit – a time to dread but a necessary evil, or an opportunity to benefit your organisation? It is clearly a matter of opinion, but following the right processes and finding the best auditor for your business can add value, making the audit a rewarding and beneficial experience.

Ensuring you select the right auditor is important and having a good tender process goes some way in helping this. However, it is very easy to, unintentionally, create barriers along the procurement process.

This blog sets out the points to consider in order to produce a good tender and, in turn, maximise value.

Clarity

Be clear about what you want to achieve from an audit. Do you want an in-depth audit which helps you meet objectives and add value, or do you just want the basic service for the lowest cost? The former should always be the priority, but where cost is a factor, it is important to strike a balance to ensure you receive the best possible service.

Fairness and transparency

Don't just go through the motions – it's time consuming and disappointing for all involved.

If you want a market "price check" – get one. If it is your policy to re-tender, then it would be advisable to challenge the appropriate Board to put in place measures to ensure an unbiased process. Think about the questions you ask and give the audit firms the opportunity to show their understanding of your organisation, the risks and challenges you face, and demonstrate how they can help.

Approachability

Be open for discussion – allow fact finding visits, discussions and the sharing of questions.

Highlight your tender through many communication routes, such as direct contact, tendering websites, your own website and social media. Making your tender accessible shows you are open to being approached by firms and helps attract new bidders. Hiding it, or only contacting a few known firms, means you could be missing out on the best auditor for you.

The National Housing Federation (NHF) is now considering developing a central listing of current tenders, something which would be beneficial for the sector.



Realistic

Have realistic expectations of timings – a sufficient understanding of your organisation takes time, so give adequate time and access to allow this to take place.

Tenders often set out hurdles that can be unnecessarily difficult to achieve. Make sure that what you are asking for is actually representative of what you want, and not just a tactical way of whittling the firms down. For example, is a firms' location truly important given modern technology and a willingness to travel? The best audit firm for you may not be on your doorstep, but can still be there for every meeting and reach every deadline.

Audit firms strive for excellence, which is exactly what you should look for.

- Peripheral factors, such as location, should not be the primary concern during the procurement process, but rather finding a firm with the ability to provide you with the best service that meets your audit needs.

Conclusion

Social Housing is a fast-paced, innovative and challenging sector, but it is also one at risk of inadvertently discouraging audit firms from opting to work within it.

How can you help? Create open tenders with no unnecessary barriers. Offer the opportunity for audit firms to contact you to ask questions to understand your organisation. Ultimately, most are looking for the same thing, a robust audit from a good firm, with a good relationship that adds real value.

This article was first published by the National Housing Federation.



Guy Biggin

Partner, Non Profits
guy.biggin@crowe.co.uk



Jonathan Beasley

Senior Manager, Audit
jonathan.beasley@crowe.co.uk

Date for your diary

Worcester Social Housing Conference



With the sector under mounting pressure to deliver a step change in the number of new affordable homes without sacrificing quality, we and our guest speakers will examine the strategies for achieving growth and the risks associated with them.

What we will cover

The conference will examine popular strategies to achieve growth, the practical issues involved and the risks to be aware of. We will specifically cover.

- How protected are housing providers from cyber attack? The results of our testing of the largest housing providers.
- Mergers: do they enable the combined organisations to achieve more?
- Mergers: how to structure these efficiently.
- How do you manage tax differently in a larger housing organisation? The results of our survey.
- How do you ensure a larger organisation does not stifle innovation?
- How to protect yourself from fraud in a fast growing environment.
- Managing the risks inherent in growth.

Guest speakers

The conference will provide a great opportunity to hear from and network with Crowe specialists and other social housing organisations from across the country.

We welcome Andrew Cowan from Devonshires, Simon Hatchman from recent merger PA, Andy Howarth from recent merger Platform, and Kathryn Price from Yarlinton who is preparing for its proposed merger with Radian.

When

Tuesday 10 September 2019

- 09:15 Registration and coffee
- 09:45 Conference begins
- 11:15 Coffee break
- 11:30 Conference continues
- 13:15 Lunch
- 14:15 Close

Where

Sixways Stadium
Warriors Way
Hindlip
Worcester
WR3 8ZE

Who should attend?

- Chief Executives.
- Finance Directors.
- Senior finance personnel.

Cost

There is no cost to attend.

Register

Please contact VAT@crowe.co.uk
or call Adam Cutler
+44 (0) 20 7842 7251



Start the conversation

Adam Cutler

Director, VAT and National Head of
Social Housing
adam.cutler@crowe.co.uk
+44 (0)20 7842 7162

Olivia Larson

Executive, VAT
olivia.larson@crowe.co.uk
+44 (0)20 7842 7492

Caroline Harwood

Partner and Head of Employers
Advisory Services
caroline.harwood@crowe.co.uk
+44 (0)20 7842 7274

Simon Herbert

Director, Employers Advisory Services
simon.herbert@crowe.co.uk
+44 (0)118 902 3851

Jim Gee

Partner and National Head of Forensic
Services
jim.gee@crowe.co.uk
+44 (0)20 7842 7239

Guy Biggin

Partner, Non Profits
guy.biggin@crowe.co.uk
+44 (0)1242 234421

Jonathan Beasley

Senior Manager, Audit
jonathan.beasley@crowe.co.uk
+44 (0)1242 240355

www.crowe.com



@CroweUK

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