
Preventing Delayed Overseas Income Disclosure Among New Uk Tax Residents:

A Behaviourally Informed Policy Proposal

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Abstract

This paper examines delayed overseas income disclosure among new UK tax residents and proposes a Residency Tax Orientation Statement (RTOS) as an early guidance intervention within HM Revenue and Customs' (HMRC) Government Gateway digital services. It identifies a recurring compliance pattern in which some individuals entering the UK tax system through Pay-As-You-Earn (PAYE) employment treat employer withholding as if it settles their full tax

obligations. As a result, overseas income, including rental receipts, business profit distributions, foreign investment returns, and overseas pension income, may remain undeclared for several tax years. In some cases, HMRC detects such non-compliance only after a substantial delay, by which point retrospective assessment, interest charges, and penalties may be difficult to avoid. The proposed RTOS would address this information gap through a brief yes-or-no orientation check presented at an early administrative touchpoint, directing users to relevant guidance without creating tax liability, requiring asset disclosure, or triggering enforcement action. Drawing on behavioural tax compliance theory, comparative tax administration, and published HMRC administrative data, the paper argues that a low-cost, well-timed intervention within existing digital infrastructure may help reduce delayed disclosure, improve taxpayers' understanding of worldwide income obligations, and lower the volume of multi-year compliance investigations. More broadly, the paper shows how a preventative compliance approach may be incorporated into existing UK administrative arrangements.

Keywords: policy design; tax compliance; tax residency; overseas income; worldwide income reporting; HMRC; Disclosure Timing Gap; behavioural tax compliance; preventative compliance; digital government; administrative design

1. Introduction

Tax compliance systems often face an information gap when individuals acquire tax residency in a new jurisdiction. Revenue authorities may be able to detect the commencement of domestic employment income through employer reporting, but they may not possess a similarly timely mechanism for identifying continuing overseas income once an individual has become resident. In the United Kingdom, this creates a specific compliance vulnerability for new tax residents who retain foreign income-generating assets such as rental property, family business interests, investment returns, or overseas pensions. Existing administrative pathways can therefore detect

the start of UK employment while leaving potentially relevant overseas income outside immediate administrative visibility.

UK tax law generally requires UK tax residents to consider reporting obligations in relation to worldwide income, subject to applicable statutory rules and exceptions. Yet delayed awareness of this obligation appears to contribute to a subset of compliance failures. In such cases, the problem is not necessarily that the legal rule is absent, but that some taxpayers first encounter its practical significance only at the point of an HMRC enquiry, by which time several years of non-disclosure may already have accumulated. This paper argues that delayed overseas income disclosure is therefore best understood not solely as a taxpayer behaviour problem, but as a policy design problem concerning timing, instrument choice, and administrative communication.

This framing draws on a broader literature showing that compliance outcomes are shaped by system architecture as well as by legal obligation. Slemrod and Gillitzer (2014) argue that reporting requirements, withholding structures, and information flows exert a first-order effect on compliance independent of deterrence. James and Alley (2002) likewise identify tax literacy deficits as a significant source of unintentional non-compliance, particularly where individuals are newly exposed to an unfamiliar tax system. Policy design scholarship sharpens this point further. Linder and Peters (1990) emphasise that policy outcomes depend on the conscious design of instruments rather than on legal rules alone, while Howlett (2018) shows that instrument effectiveness depends on both internal design and contextual fit. Schneider and Ingram (1993) add that policy designs communicate expectations to target populations and influence how they interpret their obligations. Applied to the present case, the absence of an early disclosure prompt for new UK tax residents is not merely an operational omission. It is a design gap within the administrative pathway through which tax obligations are communicated.

This paper introduces the concept of the Disclosure Timing Gap: the structural interval between the moment a tax obligation first arises for a new UK resident and the moment any administrative mechanism clearly signals that the obligation exists. The concept captures a class of compliance failures that is distinct from deliberate evasion and from general administrative under-resourcing. It focuses instead on failures produced by the design of when and where administrative signals are delivered.

To close that gap, the paper proposes the Residency Tax Orientation Statement (RTOS): a one-time, low-burden, guided orientation check embedded within the Government Gateway account creation process. It would ask new residents whether they hold common categories of overseas income and, where relevant, route them to existing HMRC guidance on worldwide income obligations, Self-Assessment registration, and related issues. At the pilot stage, the mechanism would impose no new tax liability, require no full asset disclosure, and create no automatic

enforcement consequence. Its purpose is informational and preventative: to move awareness forward in time and reduce misunderstanding-driven delay before it matures into a later compliance case.

The policy rationale for such an instrument becomes clearer when viewed through the interaction of behavioural friction and limited international visibility. The behavioural tax compliance literature shows that where taxpayers face complexity, uncertainty, or fear of procedural error, inaction is often the default response rather than deliberate evasion (Kirchler et al., 2008; Thaler & Sunstein, 2008). That tendency is especially relevant where a new resident enters the UK tax system through PAYE and reasonably infers from employer withholding that immediate tax obligations are already being handled. At the same time, international information exchange regimes such as the Common Reporting Standard (CRS) and FATCA provide only partial visibility over the types of income most relevant here. As the administrative sequence mapped in this paper shows, rental income from directly held property and unincorporated business income may remain outside routine international reporting channels, thereby increasing the likelihood that misunderstanding persists until a later intelligence or enquiry trigger occurs.

The central claim of the paper is therefore that delayed overseas income disclosure among some new UK tax residents should be understood as a foreseeable policy design outcome where four conditions coincide: partial visibility of offshore income, behavioural frictions that encourage delay under uncertainty, the absence of an early administrative trigger, and institutional reliance on later detection through intelligence or exchange. This paper names and theorises this structural interval as the Disclosure Timing Gap: the design-level phenomenon defined by the distance between the moment a tax obligation first arises for a new UK resident and the moment any administrative mechanism signals that it exists. It is a function of instrument timing and information architecture - and it is in principle closable through a targeted change in administrative design, without amendment to tax law or new enforcement powers. From this perspective, the RTOS is not simply a communication device. It is a targeted policy instrument designed to correct an identifiable entry-stage failure in the timing of administrative guidance.

This paper makes four contributions. First, it introduces the Disclosure Timing Gap as a theoretically grounded policy design concept that names and explains a class of compliance failures distinct from deliberate evasion: failures produced by the timing and architecture of administrative communication. This concept has not previously been applied to the delayed overseas income disclosure problem and provides a precise diagnostic tool for identifying where and how the administrative pathway should be redesigned. Second, it reframes delayed overseas income disclosure as a problem of entry-stage policy design rather than solely one of taxpayer

fault, extending existing work on compliance system architecture and third-party reporting (Kleven et al., 2011; Slemrod & Gillitzer, 2014). Third, it integrates behavioural tax compliance theory with policy design scholarship to explain why delayed disclosure can arise even in the absence of deliberate evasion. Fourth, it advances an operationally modest and testable policy instrument that is compatible with existing digital infrastructure and suitable for pilot evaluation within HMRC's current administrative environment.

The paper proceeds as follows. Section 2 sets out the theoretical framework and literature review. Section 3 describes the methodological approach. Section 4 contextualises the compliance problem with reference to migration trends and published HMRC data. Section 5 maps the administrative process through which delayed disclosure occurs. Section 6 situates the proposal within HMRC's compliance strategy and the preventative compliance literature. Section 7 applies behavioural compliance theory. Section 8 sets out the policy design. Section 9 presents an illustrative compliance pathway. Section 10 addresses equity implications with reference to horizontal equity principles. Section 11 surveys comparative international practice. Section 12 outlines an implementation pathway and addresses technical feasibility. Section 13 proposes an evaluation framework. Section 14 concludes.

2. Theoretical Framework and Literature Review: The Disclosure Timing Gap

This paper advances an integrated theoretical framework to explain a specific class of compliance failure and to derive the design requirements for a policy instrument capable of addressing it. The framework draws together policy design scholarship, tax systems design theory, behavioural tax compliance, international tax transparency, and disclosure-as-governance research. Within that synthesis, the Disclosure Timing Gap serves as the paper's central diagnostic concept for identifying where delayed overseas income disclosure emerges and what kind of intervention is required to address it.

This paper is grounded in a policy design perspective that treats delayed overseas income disclosure not simply as a problem of taxpayer behaviour, but as a problem of instrument choice, timing, and administrative architecture. In policy design scholarship, governments act through instruments, and policy effectiveness depends not only on the goals pursued but on how particular tools are selected, calibrated, and embedded within existing institutional arrangements. Linder and Peters (1990) argue that policy formulation requires conscious attention to the characteristics and trade-offs of the instruments employed, rather than treating policy implementation as an automatic extension of legal rules. Howlett (2018) extends this argument by emphasising that effective policy design depends both on the internal character of a policy tool and on its fit with the context in which it operates. Schneider and Ingram (1993) further show that policy designs communicate messages to target populations and influence how those groups understand state expectations and their own role within the policy process. Taken together, this literature suggests that the absence

of an entry-stage disclosure prompt for new UK tax residents is itself a policy design choice, even if unintended.

This perspective is especially relevant in tax administration, where compliance outcomes are strongly shaped by system design rather than deterrence alone. Slemrod and Gillitzer (2014) show that reporting structures, withholding systems, and information flows exert a first-order influence on compliance. James and Alley (2002) similarly emphasise that tax literacy deficits can generate unintentional non-compliance, especially where taxpayers are newly exposed to an unfamiliar tax system. In the present context, individuals may enter the UK tax system through PAYE, receive no structured prompt regarding continuing overseas income, and infer from payroll withholding that their obligations are already settled. The problem addressed in this paper therefore lies not in the absence of a legal rule, but in the timing and form of the administrative signal through which that rule is conveyed.

A second strand of literature concerns behavioural tax compliance. Kirchler et al. (2008) argue that compliance behaviour is shaped not only by deterrence but also by trust, understanding, and the perceived legitimacy of tax administration. Thaler and Sunstein (2008) show that where individuals face uncertainty, default structures and timing cues significantly affect behaviour. Alm et al. (2023) add that administrative sludge and procedural complexity can discourage compliance even among individuals with no intention to evade. These insights are directly relevant to new UK tax residents with overseas income. Complexity avoidance, uncertainty delay, fear of procedural error, and continuation of prior financial arrangements may all produce non-disclosure even where taxpayers would have complied had a clear and timely prompt been provided. In this sense, delayed overseas income disclosure can be understood as a predictable behavioural response to an under-designed administrative entry point.

A third body of literature concerns international tax transparency and the limits of cross-border information exchange. Cockfield (2017) argues that cross-border tax information exchange should be assessed not only in terms of information volume, but also in relation to information quality, taxpayer privacy, and enforcement capacity. This is important because it demonstrates that international exchange frameworks, while significant, do not eliminate domestic policy design problems. Johannesen et al. (2020) show that offshore enforcement initiatives can trigger substantial disclosure of previously hidden accounts and income, but these disclosures are often enforcement-led and occur only after non-compliance has already developed. Bomare and Collin

(2025) further indicate that automatic exchange frameworks still leave important categories of offshore wealth and non-financial assets outside effective reporting coverage. For the purposes of this paper, the implication is clear: international transparency systems improve late-stage detection capacity, but they do not substitute for early-stage domestic orientation where rental income, business distributions, and other non-financial overseas income remain weakly visible to the tax authority.

A fourth strand concerns disclosure as governance. Haufler (2010) argues that disclosure mechanisms do more than transmit information; they shape behaviour, accountability, and institutional expectations. In tax administration, Gould and Rablen (2020) show that voluntary disclosure schemes can increase expected revenue and reduce illegal offshore investment, but such schemes are retrospective by nature, intervening only after offshore non-compliance has already emerged. The present paper differs in design logic. It proposes an entry-stage, low-burden, guidance-led disclosure instrument aimed not at resolving established non-compliance, but at preventing misunderstanding from maturing into a later enforcement case. The Residency Tax Orientation Statement is therefore conceptualised not as a punitive or declarative filing obligation, but as a preventative policy instrument embedded at the first meaningful administrative touchpoint. On this basis, the paper advances an entry-stage preventive disclosure design framework. The framework holds that delayed overseas income disclosure is most likely where four conditions coincide: first, partial international visibility of offshore income; second, behavioural frictions that encourage delay under uncertainty; third, the absence of an early administrative trigger requiring taxpayers to consider overseas income; and fourth, institutional reliance on later intelligence, exchange, or enforcement activity. Where these conditions coexist, delayed disclosure should be understood as a foreseeable policy design outcome rather than merely as individual taxpayer failure. The proposed RTOS responds to that design gap by introducing a light-touch, non-threatening, educational prompt at the point of initial digital engagement. Its purpose is to shift awareness forward in time, reduce misunderstanding-driven delay, and strengthen voluntary compliance before arrears, penalties, and distrust accumulate.

Taken together, these strands point to a single diagnostic concept: the Disclosure Timing Gap. The Disclosure Timing Gap is the structural interval between the moment a disclosure obligation first arises for a new UK resident and the moment any administrative mechanism clearly signals that the obligation exists. It is generated by the interaction of three conditions: the absence of third-party reporting for the relevant income type, the absence of an early administrative prompt at the point of entry into the tax system, and the dominance of inaction as the default response

where no such prompt exists. The design implication is direct: an effective policy instrument must be positioned at the earliest meaningful administrative touchpoint, ask only what is necessary to trigger guided action, and reduce uncertainty without creating disproportionate burden.

This framework contributes to the literature in three ways. First, it links behavioural tax compliance theory to policy design scholarship by showing that timing failures in administrative communication can generate systematic non-compliance without deliberate evasion. Second, it positions delayed overseas income disclosure within the broader problem of instrument fit, arguing that the current UK administrative pathway relies too heavily on late detection and too little on early orientation. Third, it reframes the RTOS as a distinct policy instrument whose value lies not in enforcement power, but in its capacity to correct an identifiable entry-stage design failure within an existing digital tax system.

3. Methodological Approach

This paper adopts a qualitative policy analysis methodology, combining four analytical procedures: theoretical framework construction, administrative process mapping, behavioural compliance theory application, and comparative policy review.

The theoretical framework in Section 2 draws on policy design scholarship, tax systems design theory, third-party reporting theory, behavioural tax compliance, and disclosure-oriented governance research to construct the Disclosure Timing Gap concept and derive the design requirements for an effective policy instrument. These bodies of literature are synthesised analytically rather than tested econometrically; the framework's value lies in the coherence of the synthesis and in its ability to explain a recurring administrative pattern and generate a deployable intervention.

The administrative process mapping in Section 5 draws on published HMRC administrative data, HMRC annual reports, and the academic literature on information asymmetry in tax systems to reconstruct the sequence through which delayed overseas income disclosure typically occurs. The eight-stage failure chain is constructed analytically, drawing on published enforcement data (HMRC, 2025b) and the established literature on PAYE-based compliance (Adam et al., 2011). It is a schematic representation of a recurring pattern, not a statistical claim about frequency.

The behavioural compliance analysis in Section 7 is grounded in the academic literature on tax psychology and nudge theory, with primary reference to Kirchler et al. (2008), Thaler and Sunstein (2008), and Alm et al. (2023). The comparative policy review in Section 11 draws on published guidance documents and academic commentary for each jurisdiction reviewed; the specific sources for each comparator are cited in that section.

No individual taxpayer records were accessed. The analysis does not rely on any unpublished HMRC data. Quantitative figures cited are drawn from publicly available official statistics; where figures reflect practitioner observation rather than published data, this is noted and qualifying language is applied. This is a policy-analysis paper. It does not present an econometric evaluation or causal impact assessment; formal causal evaluation is proposed as the product of the pilot phase described in Section 12.

4. The Scale of the Compliance Problem

The United Kingdom has experienced sustained inward migration in recent years, producing a growing population of individuals who become UK tax residents while retaining financial connections to other jurisdictions. Changes in migration policy following the UK's departure from the European Union, together with skilled migration under routes such as Global Talent and Skilled Worker visas, have likely increased the proportion of new residents with continuing overseas financial interests (Migration Advisory Committee, 2020). ONS data indicate substantial long-term migration into the United Kingdom annually, a meaningful proportion of whom subsequently become UK tax residents (ONS, 2025). The precise number of new tax residents each year is not separately published, as the category depends on the application of the Statutory Residence Test introduced by the Finance Act 2013, and individuals may not know they meet its conditions.

The fiscal consequences of late overseas income disclosure are non-trivial in aggregate. HMRC's most recent tax gap estimates place the overall gap at £46.8 billion, representing 5.3% of theoretical liabilities in 2023-24 (HMRC, 2025a). The overseas undeclared income component is not published separately. However, the scale of HMRC's targeted enforcement activity in this area provides a partial indication: HMRC's 2024-25 Annual Report records that HMRC dispatched 20,000 letters to taxpayers with potential undeclared foreign income in that year, recovering £80.1 million through the Worldwide Disclosure Facility (HMRC, 2025b). It should be noted that the WDF population is broader than the specific cohort addressed in this paper; not all WDF cases involve new residents with PAYE employment. The figures are cited as an indicator of the aggregate scale of overseas income non-disclosure, not as a direct measure of the target population. Individual compliance investigations carry substantial unit costs. HMRC's published impact assessments confirm that compliance investigations are resource-intensive, though disaggregated

per-case cost figures are not publicly reported in a form that permits direct citation (HMRC, 2024). The compound effect of interest and penalties accumulated over a multi-year non-disclosure period increases both the taxpayer's liability and HMRC's administrative burden relative to what timely voluntary disclosure would have produced (Adam et al., 2011).

If inward migration remains at recent levels, the volume of delayed overseas income cases may grow correspondingly. A preventative intervention at the earliest point of entry into the digital tax system represents one means of addressing this trajectory at low administrative cost.

Table 1. Selected indicators: new UK tax residency and overseas income compliance

Indicator	Data and source
Volume of new UK tax residents (annual)	Not separately published; depends on Statutory Residence Test application (Finance Act 2013). ONS data indicate substantial long-term migration annually (ONS, 2025)
HMRC overall tax gap, 2023-24	£46.8 billion; 5.3% of theoretical liabilities (HMRC, 2025a)
Worldwide Disclosure Facility recovery, 2024-25	£80.1 million recovered; 20,000 letters issued to taxpayers with potential undeclared foreign income (HMRC, 2025b). Note: The WDF population is broader than new PAYE-registered residents.
HMRC per-case investigation cost	Disaggregated per-case figures are not publicly reported; investigations are confirmed as resource-intensive in published impact assessments (HMRC, 2024).
Detection timing: overseas income	No published figure for average delay. Detection typically follows an administrative or intelligence trigger; published average delay figures are not available; some cases appear to involve multi-year detection lags

5. The Administrative Process: How Delayed Disclosure Occurs

Existing commentary on the overseas income compliance gap tends to focus on outcomes, such as the incidence of undeclared income, rather than on the sequential administrative process through which the gap is created. This section maps that process, drawing on the information asymmetry framework developed by Kleven et al. (2011) in their analysis of third-party reporting and self-reported income. Their finding that compliance rates are substantially higher for income subject to third-party reporting than for self-reported income is directly relevant: overseas income of the types addressed in this paper falls almost entirely in the self-reported category, without the reporting infrastructure that supports domestic income compliance.

The process can be understood in eight stages, each of which creates conditions for the next. At Stage 1, an individual arrives in the UK and acquires tax resident status under the Statutory Residence Test; HMRC receives no structured signal confirming this transition. At Stage 2, the individual commences UK employment under PAYE; that system covers domestic employment income only and does not prompt consideration of overseas income sources. At Stage 3, since PAYE withholding addresses immediate requirements, Self-Assessment registration does not begin, and no overseas income prompt occurs.

At Stage 4, overseas rental income, family business distributions, or investment returns continue to be managed in the country of origin, often through prior arrangements with a local accountant who may have no awareness of UK filing obligations. At Stage 5, the Common Reporting Standard (CRS) and Foreign Account Tax Compliance Act (FATCA) frameworks provide only partial coverage of the income types at issue. CRS, implemented in the UK through the International Tax Compliance Regulations 2015, focuses on financial account information held by financial institutions; it does not capture rental income from directly held property or income from unincorporated businesses. FATCA similarly targets financial accounts. Rental receipts and unincorporated business profits therefore fall outside the international exchange infrastructure that might otherwise bring them to HMRC's attention.

Stages 6 through 8 describe the cumulative outcome: as several years elapse without disclosure, arrears, interest, and penalties accumulate; an enquiry is eventually triggered through intelligence or third-party data; and the taxpayer faces a retrospective liability that, in many cases, appears to come as a genuine surprise. The RTOS is designed to intervene between Stages 2 and 3, creating a structured guidance prompt at the point the individual first enters HMRC's digital system.

Table 2. Administrative stages of delayed overseas income disclosure

Stage	Event	Information gap
1	Individual arrives in UK; acquires tax resident status under the Statutory Residence Test	No structured onboarding signal confirming tax residency is received by HMRC
2	Commences UK employment under PAYE	PAYE covers domestic employment income only; no overseas income prompt exists
3	Does not register for Self-Assessment	No mechanism prompts an overseas income check at this stage
4	Overseas income continues to arise abroad	Income managed through prior arrangements, outside UK administrative visibility

Stage	Event	Information gap
5	CRS and FATCA do not capture non-financial income (rental, unincorporated business)	These income types fall outside international exchange frameworks; no automatic third-party reporting to HMRC
6-7	Several years elapse; HMRC enquiry triggered via intelligence or data exchange	Arrears, interest, and penalties accumulate; multi-year retrospective assessment unavoidable
8	Taxpayer faces retrospective liability	Matter may be presented as a misunderstanding of worldwide income rules rather than deliberate non-disclosure

6. Alignment with HMRC's Compliance Strategy and the Preventative Compliance Literature

HMRC's compliance framework distinguishes between promoting good compliance and preventing non-compliance (HMRC, 2025a). This distinction maps onto a broader literature on preventative versus corrective compliance design. Braithwaite (2009) argues that tax systems that invest in early education and communication tend to produce higher voluntary compliance rates than those relying primarily on detection and sanction. Similarly, OECD (2010) guidance on compliance risk management emphasises upstream interventions as more cost-effective than downstream enforcement for addressing misunderstanding-driven non-compliance.

The RTOS is designed to serve both of HMRC's strategic objectives simultaneously. On the promotional dimension, it delivers existing HMRC guidance on worldwide income obligations, Self-Assessment registration criteria, and treaty exemptions at the point when it is most likely to influence behaviour: before the individual has formed an inaccurate understanding of their obligations. On the preventative dimension, it addresses unintentional non-compliance before it accumulates into enforceable debt, at relatively low administrative cost.

The proposal does not require HMRC to create new enforcement powers or amend existing tax law. It uses existing digital infrastructure to deliver existing guidance at an earlier point. For a pilot deployment, the RTOS appears capable of operating within HMRC's existing administrative discretion under the Taxes Management Act 1970, though any formal implementation would require legal and operational review. The National Audit Office (2025) has stressed the importance of HMRC being able to support taxpayers to pay the right tax and to intervene in good time when people get things wrong; the RTOS is consistent with that preventative logic.

In operational terms, the RTOS may support earlier voluntary disclosure of overseas income; a reduction in multi-year retrospective enquiries; increased first-year overseas income reporting; and fewer disputes attributable to unexpected retrospective liabilities. These outcomes are consistent with both HMRC's stated strategic objectives and the preventative compliance framework advanced in the literature.

7. Behavioural Drivers of Late Disclosure

Understanding why some new residents fail to disclose overseas income is necessary for designing an effective intervention. The behavioural tax compliance literature, reviewed comprehensively by Kirchler (2007) and updated in Alm et al. (2023), identifies several mechanisms through which non-compliance arises in the absence of deliberate evasion. Five such mechanisms are relevant to the population addressed in this paper.

First, complexity avoidance. Individuals confronted with an unfamiliar tax system tend to default to inaction rather than incorrect action. The interaction between UK tax law, double taxation treaties, and the remittance basis is genuinely complex. As Kirchler, Hoelzl and Wahl (2008) demonstrate within the slippery slope framework, compliance behaviour is shaped by the perceived power of the tax authority and the degree of trust taxpayers place in it. Critically, where the appropriate course of action is unclear, inaction is the modal response. Kleven et al. (2011) find that self-employment income, which carries higher reporting complexity, shows significantly lower compliance rates than third-party reported wage income, a pattern consistent with complexity-driven inaction rather than deliberate evasion. The RTOS would address this by providing targeted guidance by income type, reducing the navigational burden that promotes inaction.

Second, uncertainty delay. New residents often intend to resolve their tax position once they are more settled in employment or residence. As Thaler and Sunstein (2008) establish in their treatment of choice architecture, the design of defaults powerfully determines outcomes under conditions of uncertainty. Absent a structured prompt, deferral can extend across several tax years. The RTOS creates a defined moment of action at the first point of digital engagement, making disclosure review the default step rather than an indefinite future intention.

Third, the foreign taxation assumption. Many individuals hold the misconception that income that is taxed or taxable in the country of origin is not separately reportable in the United Kingdom. This misunderstanding is particularly prevalent where overseas income pre-dates UK residency and has been managed for years under foreign tax arrangements. James and Alley (2002) identify this type of tax literacy failure as a major source of unintentional non-compliance among internationally mobile taxpayers. The RTOS would surface this assumption directly at the point of entry.

Fourth, fear of procedural error. Some individuals who suspect they may have obligations refrain from filing because they are concerned about making a mistake. As Alm et al. (2023) note in their review of sludge in tax administration, administrative complexity can actively discourage compliance: where the filing process appears daunting, avoidance of engagement becomes the path of least resistance. Framing the RTOS as an educational, non-investigative step, one that directs users to guidance rather than recording formal admissions, removes this deterrent.

Fifth, continuation of prior financial arrangements. New residents often continue to manage overseas assets through the same channels used before UK residency, without adjusting for reporting implications. This reflects a form of status quo bias identified by Kahneman, Knetsch and Thaler (1991), in which prior arrangements continue by default absent a positive reason to change them. The RTOS is intended to interrupt this inertia at the first encounter with HMRC's digital services.

Taken together, these mechanisms suggest that late disclosure is frequently a product of bounded attention, tax literacy deficits, and poorly timed administrative communication rather than concealment. This is consistent with the distinction Kirchler et al. (2008) draw between enforced compliance, produced by deterrence, and voluntary compliance, produced by trust and understanding. An intervention targeted at the understanding deficit is more appropriate for this population than a deterrence-focused response.

Table 3. Behavioural drivers of late disclosure and proposed RTOS responses

Behavioural driver	Mechanism	RTOS response
Complexity avoidance.	Inaction as default when obligations are unclear; modal response to navigational complexity (Kirchler et al., 2008; Kleven et al., 2011)	Income-type-specific guidance reduces information burden at the point of entry
Uncertainty delay.	Deferral across tax years when no structured prompt exists; default	Creates a defined moment of action at first registration

Behavioural driver	Mechanism	RTOS response
	choices dominate under uncertainty (Thaler and Sunstein, 2008)	
Foreign taxation assumption.	Belief that income taxed abroad is not UK-reportable; tax literacy deficit (James and Alley, 2002).	Directly addresses the misconception at the point of entry
Fear of procedural error.	Avoidance of filing to prevent making a mistake; administrative sludge discourages engagement (Alm, 2023).	Educational framing: no liability or investigation trigger associated with completion
Continuation of prior arrangements.	Managing overseas assets as before residency, without UK adjustment; status quo bias (Kahneman et al., 1991).	Interrupts inertia at first digital touchpoint

8. Policy Design: The Residency Tax Orientation Statement

8.1 Integration point and identification of new residents

Of the available administrative touchpoints, Government Gateway account creation is proposed as the primary delivery mechanism. Government Gateway is the authentication platform through which taxpayers access HMRC's digital services. It is the predominant touchpoint for individuals registering for Self-Assessment, activating a PAYE record, or accessing their personal tax account (HMRC, 2025a). Deployment at this point may not require primary legislation and could potentially make use of existing HMRC digital infrastructure, though any formal implementation would require confirmation through legal and operational review.

A design question raised in preparing this paper concerns how new tax resident status would be identified within Government Gateway, which does not currently collect nationality or immigration status. The RTOS proposal addresses this through a self-identification mechanism: the check would be presented to all new Government Gateway account holders via a brief introductory question asking whether the individual has recently moved to the United Kingdom or begun their UK tax residence within the previous 24 months. This approach is simple and avoids any requirement for immigration data linkage. Its limitation is reliance on self-identification, which means that individuals who do not self-identify as new residents would not receive the check. A secondary administrative linkage approach, drawing on Home Office visa arrival data through existing data-sharing gateways, is noted as a potential enhancement for the full deployment phase, subject to appropriate data governance arrangements.

The RTOS would be presented during initial account setup as a one-time ‘New UK Tax Resident Check,’ designed as a brief guided interaction.

8.2 Instrument design

The RTOS questionnaire asks only whether the individual receives or holds any of the following categories of overseas income or assets. No values, amounts, or asset disclosures are requested at this stage. The instrument is designed to be binary, to cover the most common overseas income types relevant to new UK residents, and to be non-threatening in framing. Overseas pension income has been included in recognition that it is a common income type among returnees and internationally mobile professionals.

Table 4. Proposed RTOS orientation questions

Question	Yes	No
Do you own or receive income from property outside the United Kingdom?	<input type="checkbox"/>	<input type="checkbox"/>
Do you own shares or hold a stake in a business outside the UK?	<input type="checkbox"/>	<input type="checkbox"/>
Do you receive dividends, profits, or distributions from an overseas business?	<input type="checkbox"/>	<input type="checkbox"/>
Are you a partner in, or beneficiary of, a family enterprise or trust located abroad?	<input type="checkbox"/>	<input type="checkbox"/>
Do you receive dividends or interest from overseas bank or investment accounts?	<input type="checkbox"/>	<input type="checkbox"/>
Do you receive pension income from an overseas employer or foreign pension scheme?	<input type="checkbox"/>	<input type="checkbox"/>
Do you regularly receive funds transferred from overseas (remittances)?	<input type="checkbox"/>	<input type="checkbox"/>

An affirmative response to any question would route the individual to guidance specific to that income type, covering relevant HMRC guidance pages, applicable treaty summaries, Self-Assessment registration criteria, and record-keeping expectations. Individuals with no overseas income sources would progress through the check without further action.

8.3 Safeguards

A central design requirement is that the RTOS should not generate unnecessary Self-Assessment registrations or create disproportionate burdens for individuals whose affairs are straightforward. Six safeguards are built into the design. First, the RTOS would not automatically trigger a Self-Assessment registration; it would provide guidance on when registration may be required. Second,

guidance would distinguish income types that require registration from those that may be covered by treaty exemptions or the remittance basis. Third, no tax liability would be created by completing the RTOS. Fourth, data collected through the RTOS would not be used as an investigation trigger during the pilot phase; the mechanism would function as a guidance tool only. Fifth, completion of the RTOS would not constitute notification of chargeability. Sixth, the framing would be explicitly educational so as to reduce the risk that individuals interpret participation as a compliance event.

One design tension concerns the fourth safeguard's post-pilot status. The safeguard is specified for the pilot phase only. A decision on whether to retain the non-use restriction for full deployment is a matter for HMRC's legal and operational review and falls outside the scope of this proposal. The paper notes that the answer has material implications for how taxpayers are likely to perceive and engage with the mechanism: if RTOS data were later used as an investigation trigger, the educational framing of the instrument would require reassessment.

9. An Illustrative Compliance Pathway

The administrative logic of the RTOS becomes clearer when set against the current sequence. Under present arrangements, an individual may arrive in the UK, become tax resident, and commence employment under PAYE without receiving any structured prompt regarding continuing overseas income. With no clear trigger perceived, Self-Assessment registration does not occur. Foreign rental or business income continues to be managed through prior arrangements. In due course, HMRC becomes aware of the income through data, intelligence, or other channels, and the matter becomes a multi-year compliance case.

The following scenario is a hypothetical composite, constructed to illustrate the failure chain described in Section 5. It does not represent any individual case.

An individual relocates to the United Kingdom under a Skilled Worker visa and commences employment with a UK-based employer. Tax is deducted at source under PAYE. Because HMRC makes no further contact and employment tax appears fully managed, the individual assumes their UK tax affairs are in order. In the country of origin, rental income continues to be received from a property held prior to the move and is administered by a local managing agent. Several years later, HMRC identifies the overseas rental income through third-party data or international information exchange. A multi-year assessment follows. The individual, who is receiving professional tax

advice for the first time, reports that they understood income already subject to foreign tax to be outside the scope of UK reporting. They state they would have filed from their first year of residence had they understood the obligation.

Had the RTOS been presented at Government Gateway registration, the property income question would have triggered guidance on overseas rental income obligations, including the Self-Assessment registration threshold and the treatment of foreign tax credits. In many such circumstances, earlier guidance may have reduced the likelihood of a later compliance case. The key mechanism in this pattern is the timing of awareness rather than deliberate non-disclosure.

10. Equity Considerations in Compliance Timing

Tax systems derive legitimacy in part from the horizontal equity of their application. Horizontal equity, the principle that individuals in substantially similar positions should bear substantially similar tax burdens, is a foundational norm in tax theory (Musgrave and Musgrave, 1989; Kaplow, 1989). In the context of compliance administration, horizontal equity requires not only that the tax law treat comparable taxpayers comparably, but that the administrative processes through which that law is enforced do not systematically advantage some taxpayers over others on the basis of factors unrelated to their legal position.

The current administrative configuration produces an asymmetric outcome that sits uncomfortably with horizontal equity. Two individuals with comparable income profiles and identical legal obligations under the worldwide income principle may follow quite different compliance paths depending solely on whether their rental income originates from a domestic or overseas source.

UK-sourced rental income is more visible to HMRC from an early stage through domestic data sources: letting platform data, land registry transactions, and local authority licensing registers all provide third-party information that supports early identification. By contrast, overseas rental income from the same UK tax resident may remain undetected for several years, pending an intelligence trigger, voluntary disclosure, or data received through international exchange. This differential is not a product of the substantive tax law, under which both individuals are equally liable. It is a product of an information gap in how that law is administered. As Kleven et al. (2011) demonstrate, the compliance gap between third-party-reported and self-reported income is a direct function of information availability rather than taxpayer intent.

The RTOS would reduce this asymmetry by providing residents with overseas income the same early-stage guidance that domestic income earners receive, in effect, through administrative data

flows. It does not alter the substantive law or introduce new obligations; it addresses the gap in the administrative communication of existing ones. From a horizontal equity perspective, this represents a normalisation of the informational position of the two groups rather than a new burden on either.

Table 5. Asymmetric compliance timing by income source

Income type	Detection mechanism	Typical detection timing
UK rental income	Third-party data: letting platforms, land registry, local authority licensing	Often earlier in the reporting cycle through domestic third-party data
Overseas rental income (same UK resident)	Intelligence, third-party data, or CRS exchange; dependent on trigger. No automatic third-party reporting to HMRC	In some cases, only after several years, dependent on intelligence or data exchange

11. Comparative International Practice

A number of peer jurisdictions have developed mechanisms to orient new residents towards their overseas income obligations at or near the point of residency commencement. This comparative review uses three analytical dimensions: whether the mechanism is entry-stage or post-residency, whether it is declarative or enforcement-linked, and whether it operates through self-identification or administrative data linkage. These dimensions are relevant to assessing the design choices available to HMRC.

In Australia, the Australian Taxation Office publishes guidance for Australian residents on foreign and worldwide income, making clear that residents must declare income earned anywhere in the world. This represents a guidance-led, entry-stage orientation approach, though it is not a mandatory disclosure instrument (Australian Taxation Office, 2025).

In Canada, the T1135 Foreign Income Verification Statement requires Canadian tax residents with specified foreign property exceeding CAD\$100,000 in cost to file an annual declaration. The requirement is triggered by residency and applies from the first tax year of residence. It is declarative in form: its purpose is awareness and record-creation rather than immediate enforcement (Canada Revenue Agency, 2024). The T1135 is more prescriptive than the RTOS proposed here, but its declarative logic is similar.

In Ireland, Revenue provides online tax-residence guidance stating that residents are chargeable to Irish tax on worldwide income. The Irish approach appears to offer the closest guidance-led comparison to the RTOS in design intent, although the institutional details differ (Revenue Commissioners, 2025).

The United States imposes more extensive requirements, including the Report of Foreign Bank and Financial Accounts (FBAR) filing under the Bank Secrecy Act and Form 8938 filing under FATCA, both of which are triggered upon residency. These instruments carry civil and criminal penalties for non-compliance. The US model is considerably more complex than the RTOS and is noted for contrast rather than as a design template.

The United Kingdom currently relies on post-residency compliance guidance and later-stage administrative activity rather than an entry-stage orientation step. The RTOS draws on guidance-led elements found in Australia and Ireland, while the T1135 precedent confirms that some jurisdictions have required active declaration of foreign income from the first year of residence. The RTOS occupies a lighter-touch position in this spectrum, consistent with the UK system's preference for guidance-led compliance design.

Table 6. International practice: residency-stage overseas income orientation mechanisms

Country	Mechanism	Stage and type	Source and notes
Australia	ATO foreign income and residency guidance integrated into myTax account setup	Entry-stage; guidance-led; self-identification	ATO (2024). Guidance-led approach; useful comparison for early-stage orientation
Canada	T1135 Foreign Income Verification Statement; annual filing for foreign property exceeding CAD\$100,000	Entry-stage; declarative; residency-triggered	Canada Revenue Agency (2024). More prescriptive than RTOS; declarative logic comparable
Ireland	Revenue Online Service 'Moving to Ireland': explicit direction to worldwide income rules at registration	Entry-stage; guidance-led; integrated at registration	Revenue (2023). Guidance-led comparison with the RTOS; institutional details differ
United States	FBAR (Bank Secrecy Act) and Form 8938 (FATCA); annual filing requirements	Entry-stage; enforcement-linked; penalty-led	IRS (2024). More complex and penalty-led; noted for contrast, not as a model

12. Implementation Pathway

The proposed implementation pathway is designed to minimise operational disruption, make use of existing digital infrastructure, and build an evidential base before wider deployment.

Phase 1 (Months 1-3): Pilot design. HMRC Policy Lab undertakes an internal scoping exercise covering both policy design and technical integration requirements for the Government Gateway platform. Stakeholder consultation is conducted with the Chartered Institute of Taxation (CIOT), the Low Incomes Tax Reform Group (LITRG), the Chartered Institute of Payroll Professionals (CIPP), and relevant migrant advisory bodies. A prototype RTOS questionnaire is developed within the Government Gateway test environment. The self-identification approach described in Section 8.1 is tested in user research alongside the administrative data linkage alternative.

Phase 2 (Months 4-12): Controlled pilot. The RTOS is deployed to a defined cohort of new Government Gateway account holders who self-identify as recently arrived in the UK. Participation is voluntary. The mechanism carries no enforcement linkage during the pilot phase.

Phase 3 (Months 13-18): Evaluation. Outcomes are assessed against the metrics set out in Section 13. The evaluation design is a quasi-experimental pre-post comparison: the pilot cohort is compared with a matched group of new Government Gateway registrants from the preceding period. A fully randomised controlled design was considered but is not proposed at the pilot stage, given the difficulty of partitioning a universal-access digital platform into treatment and control groups without introducing administrative complexity that would itself affect behaviour. The pre-post quasi-experimental design is more practicable and follows precedents in HMRC's own evaluation methodology (Hallsworth et al., 2017).

Phase 4 (Month 19 onwards): Full deployment. A broader rollout could extend the mechanism across major HMRC digital entry points, subject to pilot findings and operational review. At this stage, the decision on whether to introduce an administrative data linkage mechanism to supplement self-identification is also taken based on pilot evidence.

Note on legislative basis: the RTOS, as designed for pilot deployment, appears capable of operating within HMRC's existing administrative discretion under the Taxes Management Act 1970. No primary legislative amendment is likely to be required at pilot stage, though this is subject to legal review.

13. Proposed Evaluation Framework

A structured evaluation framework is necessary both to establish the evidential basis for any decision on full deployment and to contribute to the broader literature on behavioural interventions

in tax administration. The evaluation approach is informed by Hallsworth et al. (2017), whose field experiments with HMRC demonstrated that modest administrative changes in taxpayer communication could produce measurable shifts in compliance behaviour. It is also informed by Alm et al. (2023), who argue that evaluations of behavioural compliance interventions should attend to attitudinal dimensions alongside observable behavioural indicators.

Table 7. Proposed evaluation metrics: RTOS pilot

Type	Metric	Measurement approach
Primary	Rate of early Self-Assessment registration for overseas income	Percentage change in SA registration within 12 months of Government Gateway registration: pilot cohort compared with pre-period matched group
Primary	Voluntary disclosure rate for overseas income types	Year-on-year change in first-year overseas income declarations among new registrants
Primary	Volume of multi-year overseas income enquiries	Number of enquiries covering three or more tax years, pre- and post-RTOS deployment
Secondary	Average arrears per case at point of discovery	Mean outstanding liability per investigated case, pre- and post-RTOS
Secondary	First-tier Tribunal cases involving overseas income	Volume of relevant tribunal cases, pre- and post-RTOS deployment
Secondary	RTOS completion rate and user experience	Proportion completing the check; drop-off rate by question; completion time
Qualitative	Taxpayer awareness survey	Self-reported understanding of overseas income obligations at registration and at 12 months

These metrics support assessment of both direct compliance outcomes and wider system effects within a standard 12 to 18-month pilot window. The inclusion of the taxpayer awareness survey is important: a reduction in enquiry volumes in the short term may not be detectable if the detection lag is several years. The attitudinal measure provides an early indicator of whether the mechanism is producing the awareness change that underpins the long-term compliance effect.

14. Conclusion

This paper has argued that delayed overseas income disclosure among some new UK tax residents should be understood not solely as a problem of taxpayer behaviour, but as a problem of entry-stage policy design. The central claim is that a compliance gap can emerge when individuals enter the UK tax system through domestic employment channels, receive no structured prompt regarding

continuing overseas income, and encounter the practical meaning of worldwide income obligations only years later during an HMRC enquiry. In such cases, retrospective liabilities, interest, and penalties may reflect not only legal non-disclosure, but also a preventable failure in the timing of administrative communication.

By framing the issue in this way, the paper contributes to policy design scholarship as well as to the tax compliance literature. It shows that the design of administrative entry points matters for compliance outcomes, particularly where legal obligations depend heavily on self-reporting and where international information exchange provides only partial visibility over the relevant income streams. The paper has therefore treated the Residency Tax Orientation Statement not simply as a communication device, but as a distinct policy instrument: a light-touch, preventative disclosure mechanism intended to correct a specific timing failure within the UK tax administration pathway. The analysis suggests that the RTOS has three potential advantages. First, it shifts awareness forward in time by creating an early administrative trigger for taxpayers to consider overseas income obligations at the point of digital entry. Second, it does so without imposing a full disclosure requirement, automatic Self-Assessment registration, or enforcement consequences at pilot stage. Third, it fits within HMRC's wider preventative compliance logic by addressing misunderstanding before it matures into multi-year debt and resource-intensive investigation. In this respect, the proposal is intentionally modest. Its contribution lies not in legal compulsion, but in better instrument timing, clearer signalling, and lower-friction guidance within an existing administrative system.

The paper has also shown that a serious policy proposal in this area must go beyond general advocacy and confront implementation detail. It has therefore addressed the sequence through which delayed disclosure currently arises, the design safeguards required to avoid disproportionate burdens, the administrative questions surrounding pilot deployment, and the metrics by which success should be assessed. These features matter because the value of an early guidance instrument depends not only on its conceptual appeal, but on its ability to operate credibly within existing digital infrastructure and to generate measurable compliance improvements under real administrative conditions.

The broader implication is that preventative compliance should be treated as a policy design question, not merely as a communications exercise. Where compliance failures arise from delayed recognition of obligations rather than deliberate evasion, governments may benefit from

instruments that intervene earlier, communicate more clearly, and reduce the distance between legal status and practical understanding. Whether the RTOS would generate measurable gains in awareness, registration, and early disclosure is ultimately an empirical question. That is why the proposed pilot and evaluation framework are central to the paper's argument rather than ancillary to it.

Future research should test the RTOS against the evaluation framework proposed here and assess whether similar entry-stage disclosure instruments could be adapted for other categories of late-disclosure risk within the UK tax system. Potential areas include the transition into self-employment, the acquisition of UK investment income by newly arrived residents, and other settings in which legal obligations arise before administrative guidance is clearly encountered. More broadly, the paper suggests that small, well-timed policy instruments may play a meaningful role in improving compliance where the core failure lies less in the substance of the law than in the design of the administrative pathway through which that law is first understood.

References

- Adam, S., Besley, T., Blundell, R., Bond, S., Chote, R., Gammie, M., Johnson, P., Myles, G., & Poterba, J. (Eds.). (2011). *Tax by design: The Mirrlees review*. Oxford University Press.
- Alm, J., Burgstaller, L., Domi, A., März, A., & Kasper, M. (2023). Nudges, boosts, and sludge: Using new behavioral approaches to improve tax compliance. *Economies*, 11(9), 223. <https://doi.org/10.3390/economies11090223>
- Australian Taxation Office. (2025). Australian resident foreign and worldwide income. <https://www.ato.gov.au/individuals-and-families/income-deductions-offsets-and-records/income-you-must-declare/foreign-and-worldwide-income/australian-resident-foreign-and-worldwide-income>
- Bomare, J., & Collin, M. (2025). When bankers become informants: Behavioral effects of automatic exchange of information (Working Paper No. 33). EU Tax Observatory. <https://www.taxobservatory.eu/publication/when-bankers-become-informants-behavioral-effects-of-automatic-exchange-of-information/>
- Braithwaite, V. (2009). *Defiance in taxation and governance: Resisting and dismissing authority in a democracy*. Edward Elgar.
- Canada Revenue Agency. (2024). T1135 foreign income verification statement. <https://www.canada.ca/en/revenue-agency/services/forms-publications/forms/t1135.html>
-

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- Cockfield, A. J. (2017). How countries should share tax information. *Vanderbilt Journal of Transnational Law*, 50(5), 1091–1132.
- Gould, M., & Rablen, M. D. (2020). Voluntary disclosure schemes for offshore tax evasion. *International Tax and Public Finance*, 27(4), 805–831. <https://doi.org/10.1007/s10797-019-09586-1>
- Hallsworth, M., List, J. A., Metcalfe, R. D., & Vlaev, I. (2017). The behavioralist as tax collector: Using natural field experiments to enhance tax compliance. *Journal of Public Economics*, 148, 14–31. <https://doi.org/10.1016/j.jpubeco.2017.02.003>
- Haufler, V. (2010). Disclosure as governance: The extractive industries transparency initiative and resource management in the developing world. *Global Environmental Politics*, 10(3), 53–73. https://doi.org/10.1162/GLEP_a_00014
- HM Revenue & Customs. (2024). Annual report and accounts 2023 to 2024. <https://www.gov.uk/government/publications/hmrc-annual-report-and-accounts-2023-to-2024>
- HM Revenue & Customs. (2025a). Measuring tax gaps 2025 edition: Tax gap estimates for 2023 to 2024. <https://www.gov.uk/government/collections/measuring-tax-gaps>
- HM Revenue & Customs. (2025b). HMRC annual report and accounts: 2024 to 2025. <https://www.gov.uk/government/publications/hmrc-annual-report-and-accounts-2024-to-2025>
- Howlett, M. (2018). The criteria for effective policy design: Character and context in policy instrument choice. *Journal of Asian Public Policy*, 11(3), 245–266. <https://doi.org/10.1080/17516234.2017.1412284>
- Internal Revenue Service. (2024). Report of foreign bank and financial accounts (FBAR). <https://www.irs.gov/businesses/small-businesses-self-employed/report-of-foreign-bank-and-financial-accounts-fbar>
- James, S., & Alley, C. (2002). Tax compliance, self-assessment and tax administration. *Journal of Finance and Management in Public Services*, 2(2), 27–42.
- Johannessen, N., Langetieg, P., Reck, D., Risch, M., & Slemrod, J. (2020). Taxing hidden wealth: The consequences of U.S. enforcement initiatives on evasive foreign accounts. *American Economic Journal: Economic Policy*, 12(3), 312–346. <https://doi.org/10.1257/pol.20180410>
- Kahneman, D., Knetsch, J. L., & Thaler, R. H. (1991). Anomalies: The endowment effect, loss aversion, and status quo bias. *Journal of Economic Perspectives*, 5(1), 193–206. <https://doi.org/10.1257/jep.5.1.193>
- Kaplow, L. (1989). Horizontal equity: Measures in search of a principle. *National Tax Journal*, 42(2), 139–154. <https://doi.org/10.1086/NTJ41788764>
- Kirchler, E. (2007). *The economic psychology of tax behaviour*. Cambridge University Press.
- Kirchler, E., Hoelzl, E., & Wahl, I. (2008). Enforced versus voluntary tax compliance: The slippery slope framework. *Journal of Economic Psychology*, 29(2), 210–225. <https://doi.org/10.1016/j.joep.2007.05.004>
- Kleven, H. J., Knudsen, M. B., Kreiner, C. T., Pedersen, S., & Saez, E. (2011). Unwilling or unable to cheat? Evidence from a tax audit experiment in Denmark. *Econometrica*, 79(3), 651–692. <https://doi.org/10.3982/ECTA9113>
-

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- Linder, S. H., & Peters, B. G. (1990). Policy formulation and the challenge of conscious design. *Evaluation and Program Planning*, 13(3), 303–311. [https://doi.org/10.1016/0149-7189\(90\)90061-Z](https://doi.org/10.1016/0149-7189(90)90061-Z)
- Migration Advisory Committee. (2020). Migration Advisory Committee (MAC) report: points-based system and salary thresholds. <https://www.gov.uk/government/publications/migration-advisory-committee-mac-report-points-based-system-and-salary-thresholds>
- Musgrave, R. A., & Musgrave, P. B. (1989). *Public finance in theory and practice* (5th ed.). McGraw-Hill.
- National Audit Office. (2025). Collecting the right tax from wealthy individuals. <https://www.nao.org.uk/reports/collecting-the-right-tax-from-wealthy-individuals/>
- Organisation for Economic Co-operation and Development. (2010). *Understanding and influencing taxpayers' compliance behaviour*. OECD Publishing.
- Office for National Statistics. (2025). Long-term international migration, provisional: Year ending June 2025. <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/bulletins/longterminternationalmigrationprovisional/yearendingjune2025>
- Revenue Commissioners. (2025). Tax residence. <https://www.revenue.ie/en/jobs-and-pensions/tax-residence/index.aspx>
- Schneider, A., & Ingram, H. (1993). Social construction of target populations: Implications for politics and policy. *American Political Science Review*, 87(2), 334–347. <https://doi.org/10.2307/2939044>
- Slemrod, J., & Gillitzer, C. (2014). *Tax systems*. MIT Press.
- TaxWatch UK. (2025). State of tax administration 2025. <https://www.taxwatchuk.org/state-of-tax-administration-2025>
- Thaler, R. H., & Sunstein, C. R. (2008). *Nudge: Improving decisions about health, wealth, and happiness*. Yale University Press.
-