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HMRC's Customer Compliance Group explained

Speed read

HMRC's Customer Compliance Group employs around 28,000 staff – almost half of HMRC's workforce – with most compliance activity driven by Individuals and Small Business Compliance and Wealthy and Mid-Sized Business Compliance. Compliance checks and yield have risen steadily over the last five years, while intensive fraud investigations remain relatively limited and highly targeted.

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The Customer Compliance Group (CCG) was established in the second half of 2016, after a major restructure to the previously known Enforcement and Compliance Group. As at September 2025, its total staff figure for 2024/25 was 28,074 full-time equivalents (FTEs), almost half of HMRC's entire headcount.

The CCG directorates

Prominent directorates within HMRC's CCG are as follows:

- **Individuals and Small Business Compliance and Wealthy and Mid-sized Business Compliance:** These two directorates make up the vast majority of CCG, with around 12,400 staff combined – nearly half of all CCG staff – and therefore represent the core of HMRC's investigative and compliance resource. In practice, most enquiry letters will come from one of these two directorates.
- **Large Business:** The LB directorate employs around 2,500 staff to manage around 2,000 of the UK's largest businesses, measured by turnover. Given the relatively small number of businesses within its scope, it employs far fewer staff than ISBC and WMBC, despite the size and complexity of the taxpayers it oversees.

  It offers a distinctly different and closer relationship with HMRC through its network of Customer Compliance Managers (CCMs), broadly analogous to relationship managers in the private sector. Staff are organised into several regional hubs.
- **Risk & Intelligence Service:** RIS, with around 3,300 staff, seeks out intelligence from across the UK and offshore jurisdictions, analyses that intelligence, and assesses the tax risks it presents to the UK Exchequer. RIS has personnel in many countries, sharing intelligence and operational practices with overseas tax authorities.

  Importantly, RIS has evolved from solely producing pre-risk assessed cases for operational teams to becoming operational in its own right. Some teams now create and run taskforces and campaigns, including tax disclosure facilities such as the Let Property Campaign and the Worldwide Disclosure Facility. These facilities remain a key part of HMRC's voluntary disclosure landscape.
- **Counter Avoidance:** The CA directorate uses a range of strategies and evolving legal powers to tackle marketed tax avoidance schemes and arrangements. It focuses on disrupting promoters but also supports users exiting avoidance schemes.

  While CA is the smallest directorate by headcount, it exerts influence disproportionate to its size, leading teams in other directorates, so it plays a project-management role within CCG.
- **Fraud Investigation Service:** Despite employing around 4,900 staff, FIS manages the most in-depth and intrusive investigations, both civil and criminal in nature. These are not routine compliance cases, but cases involving serious tax fraud, dishonesty or criminal conduct.

  FIS was formed in 2015 from the merger of Specialist Investigations and Criminal Investigations. Today, it is organised into the Prosecutions Unit, the UK Tax Matters Unit and the Offshore, Corporate and Wealthy Unit.

> The data shows a steady increase in compliance activity… with yield almost doubling over the same period

CCG compliance checks and yield

We also asked HMRC about CCG's performance over the past five years, measured by the number of compliance checks carried out and the yield secured:

Tax year	Checks Opened	Checks Completed	Yield (£m)
2020/21	247,000	248,000	£23,727
2021/22	265,000	256,000	£23,524
2022/23	299,000	280,000	£27,838
2023/24	311,000	320,000	£34,674
2024/25	332,000	316,000	£39,230

The data shows a steady increase in compliance activity, with checks opened rising by over a third since 2020/21. Yield has increased even more sharply, almost doubling over the same period, suggesting either improved case selection, higher settlements or both.

Practitioners' takeaways

Most compliance checks will continue to be initiated by ISBC and WMBC. The smallest taxpayers fall within ISBC's remit, which remains HMRC's largest single directorate. It is HMRC's duty to create a deterrence effect, otherwise scrutiny may appear to fall disproportionately on larger and more complex businesses.

While FIS attracts significant attention, only a small proportion of its work involves civil fraud investigations. In 2024/25, just 450 new COP 9 and COP 8 cases were opened, reflecting the resource-intensive nature of these enquiries and HMRC's selective approach.

Given the relatively small number of businesses monitored by LB, practitioners are less likely to encounter routine compliance correspondence from this directorate. Where contact does arise, it is typically structured, relationship-led and mediated through CCMs. ■

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