Banks are revolting

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[HMRC faces wall of silence from banks over offshore accounts - Accountancy Age](#).

The Age says:

The banks are revolting. For once, this is not criticism aimed at risky off-balance sheet accounting or bonuses. It actually refers to some of the 308 institutions that advisers say are resisting demands for overseas accounts information from the taxman.

They have support:

“Certainly some parties are looking to take this forward to appeal. This issue is really going to run for some time,” said Sue Holmes, head of tax investigations at Smith & Williamson. “There is a huge amount of confusion among the banks. They want to help HMRC in any way they can, but the banks also have to balance this aim with maintaining client confidentiality.”

I cal that complete bunkum: their choice is comply with the law or help clients who are not complying with the law. Now tell me why they want to appeal in that case?

I note the Age thinks they won't win:

In our view client confidentiality may go out of the window because of the legal muscle contained in the Schedule 36 orders. Whatever the burden on banks, HMRC is looking to nip tax evasion in the bud.

And then they come up against the opposition:

“[Banks] have got vast amounts of money here, or in the Channel Islands or maybe in their home country, on behalf of UK residents,” HMRC’s permanent secretary Dave Hartnett has said.

Not me, I stress: HMRC saying that. And I do not think Hartnett is minded to lose this one.

I hope he doesn't. More than that, I sincerely hope he names, shames and makes life misery in every way poissbkle for thsoe who do not cooperate.

Would that be political? No. It's the rule of law we're talking about here.