

How come only two thirds of all UK large businesses are...

Published: January 13, 2026, 10:17 am

HMRC [has just announced](#) that two-thirds of the 800 biggest businesses operating in the United Kingdom are under enquiry. According to a press release they have just issued:

Jennie Granger, Director General of Enforcement and Compliance at HMRC, told an HMRC stakeholder conference that most of the enquiries cover multiple issues. Granger said:

"We are enquiring into two out of three of the largest corporations operating in the UK — many of which are multinationals.

"That is not to say that most large businesses are on the make. But it does highlight both the complexity of the international tax system in which they operate and our need to be very actively scrutinising how they negotiate their way through that system."

The press release added

HMRC's large business strategy has generated £31 billion in additional revenue over the last four years. Large businesses account for a quarter of the £34 billion estimated tax gap, and contribute around 60% of UK tax receipts.

What amazes me is not that two thirds of these businesses are under investigation but that one third are not. Given the complexity of the tax issues they face the idea that two thirds of the largest companies in the UK have not a single corporation tax, PAYE or VAT issue in dispute suggests that HMRC must be really short of resources. I really can't see another likely explanation. And that's very troubling indeed.