Funding the Future

Article URL

Published: January 12, 2026, 4:56 pm

Way back in 2005, John. Christensen and I wrote what was to become the foundational document of tax justice, which it still is in many ways. The publication was called 'Tax Us if You Can', and its aim was to set the agenda for necessary reforms if the world was to have a chance of delivering fair taxation.

There were twelve agendas, one of which was country-by-country reporting. This was on automatic information exchange:

Automatic information exchange

Information exchange between countries would go a long way towards tackling the culture of tax evasion and tax avoidance.

The European Union has made some progress with the European Savings Tax Directive, but this is restricted in scope and needs to be extended to cover all countries. It is therefore proposed that:

* All banks and other financial institutions should be required to disclose as a matter of legal duty all interest, dividends, royalties, licence fees and other income(including that from employment) that they pay to citizens of another country each year, with sufficient information being provided to ensure that the recipient can be identified.
* This information should be automatically exchanged between countries so that each country has access to data on the income paid to its citizens in other countries to ensure that it is properly taxed.
* If a country refuses to do this then it should be denied economic favours until compliance is forthcoming. These favours might be access to markets without tariffs, the right to receive tax information in exchange, the right for its citizens to receive income without being taxed, or the right to enjoy the benefits of double tax relief. In combination these measures would be sufficient to encourage most countries to comply.

These requests are not unreasonable. The principle of automatic information exchange is being established in the EU, albeit that it has a long way to go yet, and bilateral treaties to allow more limited information exchange are now becoming more commonplace, even with some tax havens.

Any move towards a global framework for tax cooperation should involve the extension of the principle of automatic information exchange to corporate bodies and trusts as well as to individuals since a lot of tax planning involves trusts and corporations. This is both desirable and practicable, and such measures will also assist in tackling organised crime, corruption, terrorism and money laundering.

Why does this matter? I noted this morning that Dan Neidle, who was a major opponent of the Tax Justice Network in the way that John and I ran it at that time, and pretty much everything we had to suggest because he was at the time a rising tax star in a major form of international lawyers, **has this to say in the FT:**

Less offshore secrecy is central to any boost from wealth taxes

That is followed by:

A UK transparency levy would kick-start global efforts to make it harder to conceal business ownership and beneficiaries

For the record, we tackled that issue too. But Dan wasn't with us back then as far as I can ever recall: he was the go-to man for those wanting to snipe at what we were tirelessly trying to achieve.

I like a reformed sinner, but Dan needs to acknowledge that much of what he now demands is based on the foundations laid by those whose work he always sought to criticise whenever he could.

I'm proud of what we achieved. There would be no discussion of wealth taxes now if we had not written 'Tax Us If You Can' and then delivered large chunks of what we demanded.