

The Mechanics of Tax Risk Management

Mastering Tax Dispute Resolution & Navigating
Global Challenges

Postgraduate Certificate

Delivered by distance learning over 16 weeks

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**Middlesex
University
London**

Course Overview

The Tax Risk Management Program is meticulously designed to equip professionals with the expertise required to navigate the complexities of tax risk and dispute resolution in a global business environment.

This programme offers a comprehensive curriculum that delves deep into the identification, assessment, and mitigation of tax risks, while providing practical skills for effective tax governance. Participants will explore key areas such as tax risk assessment, transfer pricing challenges for multinational enterprises, and strategies for managing tax audits and disputes.

The programme emphasises real-world applications through case studies, simulations, and interactive sessions, ensuring that learners can apply theoretical knowledge to practical scenarios. Additionally, the course covers the latest developments in tax regulations and compliance, preparing participants to respond proactively to changes in the tax landscape.

A unique aspect of this programme is its focus on international tax issues, providing insights into regional and jurisdiction-specific challenges. This global perspective is complemented by the extensive expertise of Prof. Dr. Daniel N. Erasmus, a renowned authority in tax risk management, who brings invaluable practical experience and knowledge to the course.

By the end of the program, participants will be proficient in designing and implementing robust tax risk management frameworks, effectively handling tax audits, and resolving disputes with tax authorities. They will be prepared to take on authoritative roles in tax governance, advising senior management and boards on strategic tax decisions, and enhancing their organisation's financial stability and reputation.

What You Will Learn

Upon successful completion of the programme, participants will be able to:

- Identify tax risks and evaluate their impact on their organisation
- Develop strategies to manage and mitigate identified risks
- Understand the principles and practices of transfer pricing and its implications
- Gain insights into effective communication and negotiation with tax authorities
- Master the processes involved in resolving tax disputes – from initial engagement to litigation and settlement

Additionally, there are significant benefits of attending – for both, businesses and individuals, as follows:

For Businesses:

- Adopt the latest tax regulations and compliance strategies to meet tax obligations, reducing penalties and legal issues
- Protect against unforeseen liabilities and maintain financial stability
- Integrate tax risk considerations into broader strategic planning for informed decision-making
- Minimise disruptions to business operations

For Individuals:

- Career advancement opportunities and accreditation from Middlesex University
- Comprehensive skills development in tax risk management, including regulations, risk assessment, and strategic planning
- Prepare for leadership and advisory roles – guide senior management on tax risk management strategies
- Gain global perspective and insights into international tax issues – prepare for roles in multinational companies and cross-border tax matters



**Book Online
Here**



On successful completion of the course, you will be awarded the IFF digital badge. Share your achievement with your colleagues and peers on your LinkedIn profile and other social profiles.

GROUP BOOKINGS AVAILABLE

You can now attend our online Postgraduate Certificate course as a group!

Contact us at +44 20 8052 2090 or email us at: cs@iff-training.com and we will be able to help you and your colleagues join our training course.

Course Leader



Dr Daniel N Erasmus

BProc (Unisa), HDip Tax (Wits), PhD (UKZN)

Dr Daniel N. Erasmus focuses on tax controversy with a general emphasis on complex domestic and international issues and a particular emphasis on transfer pricing and tax dispute issues.

Daniel's transfer pricing experience includes extensive involvement with the identification, valuation, and movement of intangible property in a variety of industries. His 30+ years' experience includes all aspects of income tax planning, Revenue Service administrative proceedings, and tax litigation.

Daniel holds a PhD in Tax and Constitutional law. He is an international tax adjunct professor, and author of numerous tax textbooks.

Studying Online With IFF

- **Cost Effective** – Study around your busy schedule with no need to travel
- **100% Online** - UNITS released fortnightly via our Virtual Learning Environment
- **Real-life Application** - Apply your new knowledge and skills to your work as the course progresses
- **Content** - Explore a variety of course materials including videos, case studies, and written UNITS
- **Flexibility** - Access and study when and where convenient for you
- **Interaction** - Meet like-minded students on the online forum
- **Assessment** - Check your understanding with online quizzes

Who Should Attend?

The study of Tax Risk Management is vital to a global audience within the remit of business operations, accountancy, finance, audit and economic development.

This program is ideal for tax professionals, financial executives, and corporate leaders seeking to advance their careers and ensure their organisation's compliance and success when navigating the challenges and complexities of tax management.

This programme is ideal for the following job titles:

- CEOs
- CFOs
- Tax Managers/Specialists/Accountants/Analysts/Advisers/Consultants/Preparers/Trainees
- Corporate Tax Managers/Directors/Specialists/Assistant
- All Accountants
- Tax Compliance Managers
- Business Analysts/Officers/Specialists
- Group Tax & Risk Reporting Managers/Specialists
- Audit & Tax Compliance Accountants
- Contract Tax Analysts
- Tax Payroll Managers/Specialists
- Compensation Coordinators/Managers
- Statutory & Direct Tax Accountants
- VAT Managers/Specialists
- Private Client Tax Managers
- Real Estate Tax Managers/Specialists
- Deals Tax Associates
- Inhouse Group Tax & Insurance Managers

Course at a Glance

Core Topics

Unit 1

Introduction to Tax Risk Management

Unit 2

Tax Risk Assessment

Unit 3

Transfer Pricing as a Risk for MNE's

Unit 4

Working with Tax Authorities

Unit 5

Preparing for Tax Disputes

Unit 6

Tax Dispute Engagement

Unit 7

Dispute Options

Unit 8

Going to Trial and Thereafter

Postgraduate Certificate



To make your studies more relevant and valuable, the course is validated by the Business School at Middlesex University at a Postgraduate Certificate level.

For those wishing to receive a Postgraduate Certificate from Middlesex University, an additional marked assignment of 5000 words will need to be submitted.

Valuable Take-aways:

- Relevant case studies
- Working templates and checklists to assist you in the workplace
- Publications, white papers and reading materials to assist in handling tax disputes
- Current updates and insights into international tax issues, regional challenges, and jurisdiction-specific considerations complemented by the extensive expertise of Prof. Dr. Daniel N. Erasmus

Live Sessions with Dr Daniel Erasmus

This programme provides the opportunity to attend four live sessions and pose questions. Each live session focuses on valuable areas of study and discussions covering application-based examples, scenarios and case studies. Recordings of all live sessions will be made available.

LIVE SESSION 1

- Tax Risk Assessment Strategies: How to identify, measure, and prioritise risks with real-world examples.
- Regulatory Compliance and Risk Mitigation: Best practices for audits, dispute resolution, and proactive risk management.

LIVE SESSION 2

- Best Practice for handling Tax Audits
- Effective Strategies for Managing Tax Authorities
- Practical examples to help minimise risks, resolve disputes, and maintain compliance in international tax scenarios.

LIVE SESSION 3

- Discussion on Preparing for Tax Disputes
- Engaging with the Tax Authorities: Navigating Administrative Appeals and Pretrial Procedures.
- Practical insights to effectively handle disputes and build strong cases for resolution.

LIVE SESSION 4

- Discussion on Dispute Options: Alternative Dispute Resolution (ADR)
- The role of Litigation in Tax Disputes
- Conducting a Trial and developing effective Settlement Strategies
- Practical guidance on navigating trials and post-trial resolutions for optimal outcomes.

Course Agenda

UNIT 1 INTRODUCTION TO TAX RISK MANAGEMENT

Aim

This unit provides an overview of the fundamental concepts and principles of managing tax-related risks within an organisation. It covers the identification, assessment, and mitigation of potential tax risks, emphasising the importance of compliance, strategic planning, and the role of tax governance in safeguarding an organisation's financial health.

This unit lays the groundwork for understanding how effective tax risk management contributes to overall corporate risk management and sustainability.

Learning Outcomes

On successfully completing this unit, participants will be able to:

- Implement the basic principles and concepts of tax risk management – including the identification and classification of tax risks.
- Develop the ability to assess and evaluate tax risks within an organisational context.
- Apply various strategies and approaches for mitigating and managing tax risks effectively.
- Recognise the importance of tax compliance and governance in the broader framework of corporate risk management.
- Highlight insights into the role of tax risk management in strategic business planning and decision-making.
- Apply theoretical knowledge to real-world scenarios through case studies, enhancing practical understanding and problem-solving skills.
- Improve the ability to communicate tax risk issues and strategies to stakeholders effectively.

UNIT 2 TAX RISK ASSESSMENT

Aim

This unit focuses on the methodologies and tools used to identify, evaluate, and prioritise tax risks within an organisation. It emphasises the importance of understanding the financial, operational, and reputational impacts of tax risks, and provides practical techniques for conducting comprehensive tax risk assessments.

This unit aims to equip participants with the skills necessary to effectively assess tax risks and integrate these assessments into broader risk management and strategic planning processes.

Learning Outcomes

On successfully completing this unit, the participant will be able to:

- Identify various types of tax risks – including financial, operational, and reputational risks.
- Apply the methodologies and tools used to evaluate and measure the impact of tax risks.
- Learn to prioritise tax risks based on their potential impact and likelihood, ensuring effective resource allocation.
- Understand how to assess the financial, operational, and reputational consequences of identified tax risks.
- Integrate tax risk assessments into broader organisational risk management and strategic planning processes.
- Apply assessment techniques through case studies to enhance practical understanding and problem-solving abilities.
- Improve the ability to communicate the findings of tax risk assessments to stakeholders in a clear and effective manner.

Course Agenda

UNIT 3

TRANSFER PRICING AS A RISK FOR MULTINATIONAL ENTERPRISES

Aim

This unit examines the complexities and challenges multinational enterprises (MNEs) face regarding transfer pricing regulations. It explores how transfer pricing can pose significant tax risks, including compliance issues, financial penalties, and reputational damage.

This unit aims to provide participants with a deep understanding of transfer pricing mechanisms, regulatory requirements, and strategies for managing related risks effectively.

Learning Outcomes

On successfully completing this UNIT, the participant will be able to:

- Understand transfer pricing principles and regulations affecting multinational enterprises (MNEs).
- Identify and evaluate the specific tax risks associated with transfer pricing in an international context.
- Apply compliance requirements for transfer pricing and the potential consequences of non-compliance.
- Develop strategies to manage and mitigate transfer pricing risks effectively.
- Understand the financial implications of transfer pricing on an MNEs overall tax burden.
- Implement proper documentation and reporting practices to support transfer pricing policies and defend against tax authority challenges.
- Apply theoretical knowledge to real-world scenarios through case studies – enhancing practical understanding of managing transfer pricing risks.
- Improve the ability to communicate transfer pricing issues and risk management strategies to relevant stakeholders.

UNIT 4

WORKING WITH TAX AUTHORITIES

Aim

This unit focuses on the dynamics of the interaction between organisations and tax authorities. It covers best practices for maintaining positive relationships, navigating audits, and resolving disputes.

This unit aims to equip participants with the skills needed to effectively manage communications and negotiations with tax authorities, ensuring compliance and minimising risks.

Learning Outcomes

On successfully completing this unit, participants will be able to:

- Gain insights into the structure, function, and expectations of tax authorities.
- Develop effective communication strategies for interacting with tax authorities.
- Apply techniques for navigating tax audits and managing the audit process.
- Resolve disputes with tax authorities through negotiation and legal avenues.
- Understand the importance of maintaining compliance and how to demonstrate it to tax authorities.
- Deliver best practices for building and maintaining positive relationships with tax authorities.
- Apply theoretical knowledge to real-world scenarios through case studies, enhancing practical understanding of managing interactions with tax authorities.
- Improve skills in preparing and presenting documentation and reports required by tax authorities.

Course Agenda

UNIT 5

PREPARING FOR TAX DISPUTES

Aim

This unit focuses on the strategies and best practices for anticipating, preparing for, and managing tax disputes. It covers the procedural and substantive aspects of tax litigation, including evidence gathering, legal frameworks, and effective negotiation techniques.

This unit aims to equip participants with the necessary skills to navigate the complexities of tax disputes and achieve favourable outcomes.

Learning Outcomes

On successfully completing this unit participants will be able to:

- Understand the legal frameworks governing tax disputes.
- Apply their skills in gathering and organising evidence to support a position in a tax dispute.
- Implement various techniques and strategies for effectively managing and resolving tax disputes.
- Acquire knowledge of the procedural aspects of tax litigation, including timelines, filings, and court procedures.
- Understand how to assess the risks and potential outcomes associated with tax disputes.
- Improve negotiation skills to achieve favourable settlements in tax disputes.
- Apply theoretical knowledge to real-world scenarios through case studies, enhancing practical understanding of managing tax disputes.
- Enhance the ability to communicate effectively with legal advisors, tax authorities, and other stakeholders during a tax dispute.

UNIT 6

TAX DISPUTE ENGAGEMENT

Aim

This unit delves into the proactive and reactive strategies involved in managing tax disputes with authorities. It covers the entire dispute resolution process, from initial engagement and communication with tax authorities, through to negotiation, mediation, and litigation.

This unit aims to equip participants with the knowledge and skills to effectively handle tax disputes, while minimising risks and achieving favourable resolutions.

Learning Outcomes

On successfully completing this unit, participants will be able to:

- Understand the processes involved in tax dispute resolution, including negotiation, mediation, and litigation.
- Develop strategies for effective engagement with tax authorities during disputes.
- Improve communication skills to clearly and effectively present arguments and positions to tax authorities and other stakeholders.
- Identify, assess, and manage risks associated with tax disputes.
- Acquire advanced negotiation techniques to achieve favourable outcomes in tax disputes.
- Apply knowledge through case studies to understand practical aspects of managing tax disputes.
- Understand the legal and procedural frameworks governing tax dispute resolution.
- Enhance skills in preparing documentation and gathering evidence to support dispute resolution efforts.

Course Agenda

UNIT 7 DISPUTE OPTIONS

Aim

This unit explores the various pathways available for resolving tax disputes, including administrative appeals, mediation, arbitration, and litigation. It provides an in-depth analysis of the advantages, disadvantages, and strategic considerations of each option.

This unit aims to equip participants with the knowledge to choose the most effective dispute resolution method tailored to specific situations and organisational needs.

Learning Outcomes

On successfully completing this unit, participants will be able to:

- Implement the different tax dispute resolution methods, including administrative appeals, mediation, arbitration, and litigation.
- Develop the ability to evaluate and choose the most appropriate dispute resolution option, based on specific circumstances and organisational needs.
- Understand the advantages and disadvantages of each tax dispute resolution method.
- Apply their knowledge of the procedural requirements and processes involved in each dispute resolution option.
- Learn to assess the risks, costs, and potential outcomes associated with various dispute resolution methods.
- Apply theoretical knowledge to real-world case studies to enhance practical understanding of choosing and managing dispute resolution options.
- Improve skills in communicating the chosen dispute resolution strategy and its rationale to stakeholders.
- Understand how different dispute resolution options can be integrated into broader tax risk management and corporate strategies.

UNIT 8 GOING TO TRIAL AND THEREAFTER

Aim

This unit focuses on the final stages of the tax dispute resolution process – including preparing for trial, conducting trial proceedings, and post-trial activities. It covers trial strategies, the role of legal representation, and the steps taken after a court decision.

This unit aims to equip participants with the skills needed to navigate the complexities of tax litigation and manage the aftermath effectively.

Learning Outcomes

On successfully completing this unit participants will be able to:

- Develop skills in preparing for tax litigation, including evidence compilation, witness preparation, and crafting legal arguments.
- Apply the procedures and strategies involved in conducting a tax trial.
- Understand the importance of, and how to effectively work with, legal representation during trial.
- Learn the action-steps following a court decision, including compliance with judgments, filing appeals, and managing outcomes.
- Acquire the ability to assess and manage risks associated with going to trial and post-trial scenarios.
- Improve the ability to communicate trial strategies and outcomes to stakeholders clearly and effectively.
- Apply theoretical knowledge to real-world scenarios through case studies, enhancing practical understanding of trial and post-trial processes.
- Understand how trial and post-trial activities integrate into broader tax risk management and corporate strategies.

Education Partner



In partnership with

Option of a Postgraduate Certificate With Middlesex University

You have the unique opportunity to choose a validated option for this course and receive a postgraduate certificate on completion. This programme is quality assured by Middlesex University and you will receive a Middlesex award on successful completion. However, if university validation isn't a priority to you there is still the opportunity to take the standard non-validated course.

Entry Requirements

Participants wishing to undertake the Postgraduate Certificate are required to have a degree or equivalent qualification (or relevant work experience). Participants wishing to undertake the course but not receive the Postgraduate Certificate are not required to have any formal qualifications.

About Our Partner Middlesex University

Middlesex University is a large London based university with a history in higher education dating from 1878. In 1992 it was granted the Royal Charter making it a university. The university offers a broad range of courses through four academic schools of Arts and Education; Business; Engineering and Information Sciences; Health and Social Sciences and their Institute for Work Based Learning.

Middlesex University has over 41,000 students studying on its courses worldwide, both at its own campuses and also with partner institutions, making it one of the largest providers of British university education to international students. Middlesex University has a long history of successful collaborations with the corporate sector.

How You Gain A Postgraduate Certificate?

In addition to studying all the units and passing the short self assessment tests after each unit, you will need to submit a 5000-word assignment at the end of the course which will be assessed. The assignment will be a cumulative project that you will work through and build upon during each stage of the course. If you wish to book on the certification course there will be an assessment fee.

Education Partner

International Reach

Middlesex University is committed to meeting the needs and ambitions of a culturally and internationally diverse range of students by providing challenging academic programmes. It has a major international business school based in London with overseas campuses in Dubai and Mauritius and a global portfolio of partnerships delivering high quality validated programmes in business and management.

Staff and students come from a wide spectrum of cultures and backgrounds with a common interest in executive education that is world class, modern and applicable. Middlesex University Business School is proud of its dedicated teachers and its rich range of learning resources including distance learning and virtual learning environments.

Benefits of Studying For a Postgraduate Certificate With Us

A Middlesex Postgraduate Certificate:

- Is project-based and practical
- Offers networking opportunities during and after the course
- Provides exceptional teaching staff
- Delivers applied learning experiences
- Combines academic rigour with individual support

How Is The Course Validated?

This programme is quality assured by Middlesex University.

After successfully completing your studies you will receive a Postgraduate Certificate from Middlesex University. Middlesex University Certificates are recognised worldwide.

Quality

The Quality Assurance Agency (QAA) visited Middlesex in 2015 and noted in its report that its auditors had confidence in the University's current and likely future management of its academic standards and of the learning opportunities available to students.



The university is a major provider of business and management education, with an impressive track record of working in partnership with the public and the private sector, as well as international organisations.

About IFF

IFF | INTERNATIONAL FACULTY OF FINANCE

Providing Elite Academic Education and Training for Banking and Finance Professionals

IFF is a specialist financial training organisation, part of Informa plc, that provides professional learners with expert-led technical training. Established in 1991, we design transformative learning across a range of formats and topics that allow learners to stay innovative, make informed investment decisions, manage risks effectively, comply with regulations, and develop careers in the finance industry.

In-Company Training

IFF's bespoke training solutions will help you address your specific key business challenges. The programme is designed for you, with content focusing on the issues you and your teams are facing. The course can then be delivered at your choice of location face-to-face, digitally or a combination of the two.

- Tailored content - 100% targeted to cover your needs
- No travel or time out of the office – we will come to you
- Value for money – train teams of staff at the same time
- Risk free – we've been doing this for over 30 years

For more information, contact us at:
IFFRegistrations@informa.com
or call us at +44 (0) 20 8052 2090

About Informa Connect Academy

Informa Connect

Academy

Informa Connect Academy is a premier provider of global education and training solutions that caters to a diverse range of professionals, industries, and educational partners. We are dedicated to promoting lifelong learning and are committed to offering learners expert guidance, training, and resources to help them stay competitive in a rapidly changing world.

Our comprehensive range of courses and programmes are tailored to meet the needs of all professionals, from aspiring specialists to seasoned experts. We partner with elite academic organisations and industry leaders with unmatched expertise in their respective fields to deliver an exceptional learning experience.



CPD Certified

IFF is recognised by the CPD Certification Service and have been approved to award CPD points towards professional development certifications.

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