

**Slaughter and May Podcast**  
**Tax News: January 2024 Bonus episode**

<b>Tanja</b>	<p>Hello and welcome to this special edition of the Slaughter and May's Tax News podcast hosted by Zoe Andrews, PSL Counsel and Head of Tax Knowledge and myself, Tanja Velling, Tax PSL Counsel. To celebrate the rebranding of the podcast after almost three years – we started in July 2020 – Zoe agreed that I could ask her a few questions about her career in tax and at Slaughter and May.</p> <p>So, I've heard that this month is actually the 20<sup>th</sup> anniversary of you working at Slaughter and May so that a lot must have changed since then. What was it like when you began at the firm in 2004?</p>
<b>Zoe</b>	<p>So much has changed since I joined then. Some things for the better (like flexible working and improved technology) but other things have got worse – such as the size and complexity of the tax legislation.</p>
<b>Tanja</b>	<p>But also at the firm in the Slaughter and May tax department, there have been lots of changes. We've had 2 new partners recently, Charles Osborne and Sarah Osprey, and then during your time you must have seen many trainees and associates pass through the department.</p>
<b>Zoe</b>	<p>Yes; pleasure to see everyone finding their path; interesting to see people's different journeys – tax lawyers seem to go on to do all manner of things, including creative occupations. For those in tax, it's always great to see them again at talks and industry events.</p>
<b>Tanja</b>	<p>You mentioned industry events, tell me about the time someone recognised your voice!</p>
<b>Zoe</b>	<p>Oh yes that was funny. At a conference; one of the podcast listeners recognised my voice. I felt quite famous.</p> <p>But this relates to some other changes I wanted to talk about.</p>
<b>Tanja</b>	<p>What are those?</p>
<b>Zoe</b>	<p>Changes in technology and changes to the PSL role.</p> <p>Advances in technology in recent years mean we can now communicate our insights to a wider audience using our blog platform, podcasts and social media. I never imagined twenty years ago that I would be recording podcasts!</p>
<b>Tanja</b>	<p>That also points to a change in the PSL role then, doesn't?</p>
<b>Zoe</b>	<p>Definitely. At the start the role was more internally focussed – keeping the tax department up to date with current awareness – including summarising important cases and HMRC publications. But over time the role has taken on more of an external focus sharing my knowledge and expertise with a wider audience – participating in working groups and committees, speaking at conferences and webinars, writing Tax and the City for Tax Journal, writing blog posts, and of course, recording our Tax News podcasts.</p>
<b>Tanja</b>	<p>And out of those external publications you do, what do you enjoy the most?</p>

## SLAUGHTER AND MAY /

<b>Zoe</b>	Why Tanja, the podcast, of course
<b>Tanja</b>	<p>Good answer!</p> <p>I've certainly come to enjoy doing the podcast although, at the start, it was a bit of struggle as I find it quite difficult to listen back to my own voice as it really does sound very different on recording.</p> <p>One thing you missed out in relation to the internal responsibilities was training – we organise and lead or attend a lot of training. Anything that stands out?</p>
<b>Zoe</b>	<p>Most enjoyable where there ends up being a discussion with view from different people with different views and arguments and different levels of experience.</p> <p>Online training during the pandemic was particularly challenging. And then moving to hybrid set-ups with more flexible working following the pandemic, with technological teething issues but we've got there now. I still recall the one session when you had to climb on the table to switch on the microphones so people at home could hear! No one knew what you were doing.</p>
<b>Tanja</b>	<p>Ah, possibly not me at my most graceful. But the microphones did then work!</p> <p>I fondly recall a session – I think it was December 2022 – when we covered a theatre tax relief case discussing whether an Annual Christmas Show qualified for the relief and watched the trailer for the show which was quite amusing.</p>
<b>Zoe</b>	It's a bit like the VAT classification cases which tend to amuse and which I've used to try and convince nontax lawyers that tax is fun.
<b>Tanja</b>	I wonder how successful that was as usually the success ends when the jaffa cakes are eaten. I expect there may have been changes in your personal life over the last 20 years?!
<b>Zoe</b>	I've seen a lot of change in my personal life too – I got married, had two children (now teenagers) acquired a dog and took up yoga.
<b>Tanja</b>	<p>I remember when your dog used to join video calls during the pandemic and still really enjoy when he does that, it's very cute!</p> <p>But you forgot to mention that you're quite the book worm – although perhaps that's not a change?</p>
<b>Zoe</b>	Not really; always liked to read!
<b>Tanja</b>	So much so that you've been instrumental in keeping our tax department book club alive for a number of years now!
<b>Zoe</b>	<p>Should clarify that we don't read tax books, we read a mixture of fiction and non-fiction! It was suggested to read tax books but that was hit on the head. Meet every 4 to 6 weeks; books are voted on by the members, so a good way to explore something you wouldn't otherwise read. But it's not very formal; more of a social; everyone is invited even if they haven't read the book (or not read it in full) because we'll usually also just have a more general discussion on the</p>

## SLAUGHTER AND MAY/

	themes of the particular book and anything that's related and have a nice lunch as well!
<b>Tanja</b>	That we don't have to have read the book or the book in full is good for me because I'm generally one of the delinquents in that respect and I do admit that I'm quite behind on my reading!
<b>Zoe</b>	Is that because you're still working your way through this fantasy series you've told me about?!
<b>Tanja</b>	Very possibly! When we first discussed this special edition, I thought I would tell you about how that series reminds me of the OECD's international tax reform project – at least while Pascal Saint-Amans was leading it. As I then saw it, the series was following mainly one man on a quest to unite different nations to fight a final battle against evil, in relation to the OECD's international tax project that would be tax avoidance. But having read on, the plot has become more complicated and, in my view, too dark for such a metaphor.
<b>Zoe</b>	Your fantasy sounds a lot like tax research, where you go down on one route and then you get lots of plot twists and end up somewhere completely different
<b>Tanja</b>	Is that then what you enjoy about tax, the research and coming to different answers and getting to grips with legislation?
<b>Zoe</b>	I've had to get to grips with some quite complex and lengthy legislation – at the moment it is Pillar 2 but I won't say any more on that as I know everyone else is grappling with it too! But in previous years there have been other significant developments which brought their own challenges such as FATCA (reading the US legislation and guidance was particularly painful), BEPS and DAC6 (before most of it was axed).
<b>Tanja</b>	I certainly remember DAC6 – and there was still quite a bit of thinking to be done when the UK's replacement mandatory disclosure rules came in!
<b>Zoe</b>	But that's the beauty of tax and why I've done this job for so long. It is very intellectually stimulating and challenging, constantly developing and it's great to be a part of that. Never a dull day!
<b>Tanja</b>	Well, sometimes, I wouldn't mind a dull day!  But let's see what the rest of the day brings as we're at the end of this special edition of the tax news podcast. For our listeners, I hope you're having as dull or exciting a day as you're in the mood for!  If you'd like to hear more from Zoe and me, please subscribe to the podcast. Following the rebrand, Tax News is a show within the Slaughter and May podcast channel; and you should be able to subscribe to the show only or to the whole channel (although exactly how this works will depend on where you listen to your podcasts). Further insights from the Slaughter and May Tax department can be found on the European Tax Blog – <a href="http://www.europeantax.blog">www.europeantax.blog</a> . And you can also follow us on Twitter – @SlaughterMayTax.

