

# COMPLIANCE ON NETWORKS

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# CONTENT

1. Overview
2. Model
3. Conclusions

# OVERVIEW

# COMPLIANCE AND REFERENCE DEPENDENCE

- We relate non compliant behaviour to a body of evidence on the **importance of positional concerns** (keeping up with the Jones)
- Tax avoidance and evasion may be used to improve agents' relative standing
- As a consequence, the choice on **how much to avoid or evade is affected by social interaction**
- In our current project we develop **two models to investigate separately evasion and avoidance**

# TAX AVOIDANCE - RELEVANCE AND RESEARCH

- Tax avoidance causes **significant losses of public revenues** (1.6 bn. £ in UK)
- Growing interest by tax agencies on understanding avoidance so to **design efficient deterrence measures**
- Formal understanding of avoidance is limited
  - No established modelling approach
  - Most research focused on evasion

# PURPOSE OF THE MODEL

- Investigate how tax avoidance is impacted by social network interaction
- Analyse how network information may be exploited by the tax agency to target interventions
- Study the dynamic response of avoidance to interventions

## RELATED LITERATURE

- Kahneman and Tversky 1979  
Reference dependence of utility
- Gali 1994  
"Keeping up with the Jones"
- Myles and Naylor 1996  
Tax evasion and group conformity
- Ballester, Calvo, Zenou 2006  
Network game with local payoff complementarities
- Quah 2007  
Monotone comparative statics on network games

# RESEARCH GOALS

## Provide a Model where:

- Agents differ in **income**, **reference group** and **probability of detection**
- Taxpayers may engage in **costly** and **risky** tax avoidance
- **Self** and **social** comparison shape the reference income
- **Social** comparison depends on agents' **social network**
- **Monotone comparative statics** to analyse optimal avoidance and **agent based modelling** to address policy questions



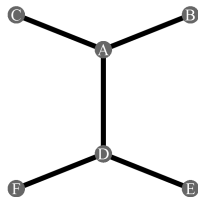
MODEL

# SOCIAL INTERACTION

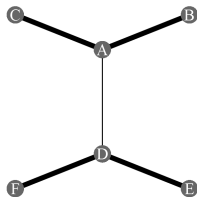
- Taxpayers do their avoidance decision based on a benchmark or “reference” level of income
- Reference income depends upon :
  - **Self:** Own past consumption (habit consumption)
  - **Social:** The (weighted) average consumption of individuals in a taxpayer’s social network

# SOCIAL NETWORK AS AN ADJACENCY MATRIX

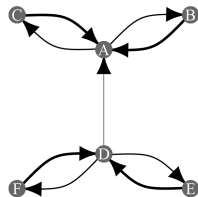
Undirected Network



Weighted Network



Directed Network



$$\begin{array}{c}
 A \ B \ C \ D \ E \ F \\
 A \ \begin{pmatrix} 0 & 1 & 1 & 1 & 0 & 0 \\ 1 & 0 & 0 & 0 & 0 & 0 \\ 1 & 0 & 0 & 0 & 0 & 0 \\ 1 & 0 & 0 & 0 & 1 & 1 \\ 0 & 0 & 0 & 1 & 0 & 0 \\ 0 & 0 & 0 & 1 & 0 & 0 \end{pmatrix} \\
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 A \ \begin{pmatrix} 0 & .5 & .5 & 0 & 0 & 0 \\ 1 & 0 & 0 & 0 & 0 & 0 \\ 1 & 0 & 0 & 0 & 0 & 0 \\ .2 & 0 & 0 & 0 & .4 & .4 \\ 0 & 0 & 0 & 1 & 0 & 0 \\ 0 & 0 & 0 & 1 & 0 & 0 \end{pmatrix} \\
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# MODELLING OF AVOIDANCE

- We define avoidance as actions that “use the tax law to get a tax advantage that Parliament never intended”
- Avoidance is **risky**
  - The tax agency may succeed in shutting down the avoidance scheme if it learns of it
- Avoidance is **costly**
  - A fraction of the tax payments that the taxpayer stands to avoid paying are paid as a fee to the “promoter” of the scheme
- If the avoidance scheme is shut down, only the avoided income is paid – **no fine can be imposed** –

# ANTI AVOIDANCE INTERVENTION

- The **tax agency** is assumed to be actively seeking to detect and **shut-down abusive schemes**
  
- There is a (compound) probability,  $p_i$ , that
  - Taxpayer  $i$  is discovered as using a scheme
  - The tax agency chooses to take legal action against the scheme
  - The tax agency legal action is successful in closing the scheme

# TAXPAYERS CHARACTERISTICS

- Taxpayers are **risk averse** (quadratic utility)
- Taxpayers are **distinguished** by:
  - Income
  - Who they compare to in the social network ("reference group")
  - Probability of successful anti-avoidance intervention

# NETWORK STRUCTURE AND UPDATING

- The network is **generated** using preferential attachment (Barabási–Albert)
- Model allows for **lagged updating of the social network** based on consumption
- We know people compare to similar others (homophily)
  - Accordingly, we allow taxpayers to update their comparisons when their own characteristics change

# THEORETICAL FINDINGS

- Key theoretical result is that **avoidance is closely related to the concept of “Bonacich” Network Centrality**
  - More “central” taxpayers avoid more
- Network centrality is a concept developed in sociology
  - Measures the amount of influence/power players have within a network



# RESEARCH QUESTIONS

→ Our analysis has centred on **three** questions:

1. How do **changes in the exogenous parameters** (income, risk aversion, etc., affect avoidance?
2. How do the of **marginal revenue effects** of an additional intervention vary between taxpayers with different degrees of **centrality** in the social network?
3. What is the **dynamic profile of the response** of avoidance to an effective **anti-avoidance intervention**?

# WHAT INFLUENCES AVOIDANCE

- The parameters of the model have differing short-run and long-run effects:
- **Short-run**
  - Before taking into account the effects of lagged adjustments in habit consumption and network updating
- **Long-run**
  - After taking into account the effects of lagged adjustments in habit consumption and network updating

# MONOTONE COMPARATIVE STATICS

	$A_i^*$		$A_i^*$
Risk Aversion	−	Tax rate	+
Habit consumption	+	Avoidance cost	+ / −
Audit prob. $p_i$	−	Audit prob. $p_j$	− / 0
Own comparison	+	Social comparison	+ / 0

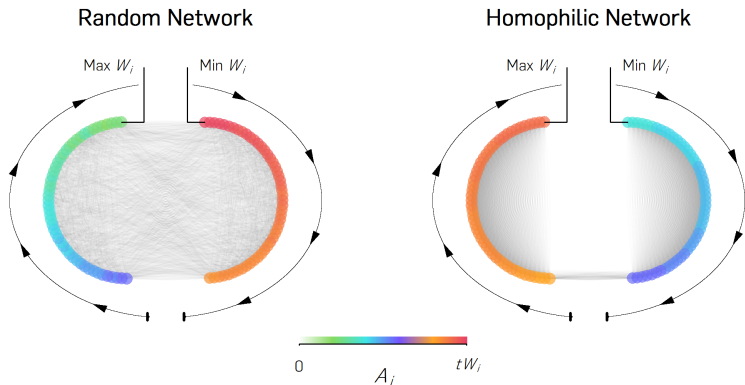
Monotone comparative statics for interior  $A_i^*$

**These results apply in the short and long run**

# AVOIDANCE AND INCOME

- In the case of **income the short-run and long-run effects can go in different directions**
- Short-run effect is for avoidance to fall after an increase in income
- But, in the long-run, taxpayers:
  - compare to higher income taxpayers
  - increase their habit consumption

# NETWORK STRUCTURE AND INCOME



If taxpayers with similar income tend to **group together** (homophily) and **social comparison plays a relevant role** in shaping reference income, the model predicts **avoidance to be increasing in income**

# INTERVENTIONS AND CENTRALITY

Is there any evidence in favor of targeting interventions against more central taxpayers ("celebrities")?

In general, **three revenue effects** follows from an anti-avoidance intervention

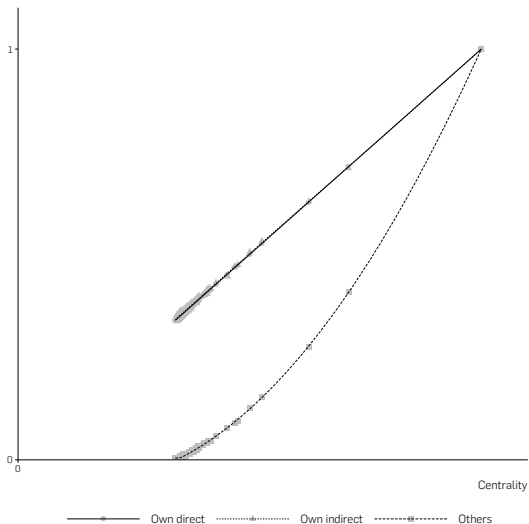
→ **Own effect**

- Direct - on targeted taxpayer, by averting attempted avoidance
- Indirect - on targeted taxpayer, from change in future avoidance behaviour

→ **Others effect**

- From induced change in the avoidance behaviour of non-targeted taxpayers

# INTERVENTIONS AND CENTRALITY

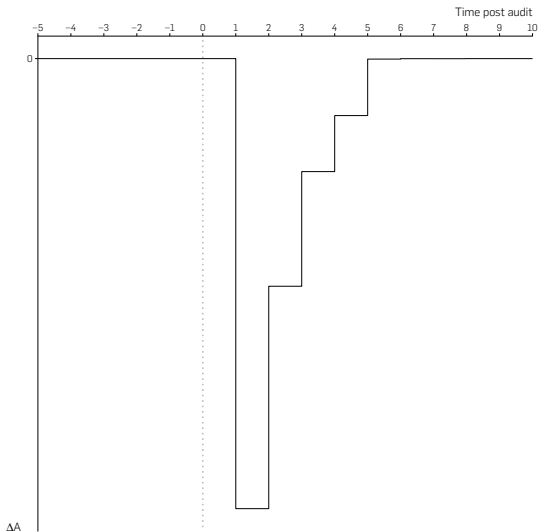


# INTERVENTIONS AND CENTRALITY

- The **own effects increase linearly** in centrality (avoidance)
- The **others indirect effect is highly non-linear** (convex)
  - Taxpayer with the lowest centrality in the network has around 35% of the centrality of the most central taxpayer, yet commands an indirect effect on other taxpayers of just 0.44% of that of the most central taxpayer.
- **Targeting most central taxpayers maximises all three revenue effects!**



# DYNAMIC RESPONSE TO LEGAL INTERVENTION



# DYNAMIC RESPONSE TO LEGAL INTERVENTION

- Here periods interpreted as years
- **Deterrence is maximal after the intervention** and slowly fades
- There is a **return to baseline after 5 years**
- Consistent with empirical literature showing a persistent effect of interventions on behaviour

## FURTHER RESEARCH

- Extend the analysis to tax evasion
- Analyse how different measures of centrality that may be available to the tax agency correlate with revenue effects
- Derive theoretical steady state results to avoid computational burden of simulations

# CONCLUSIONS

## CONCLUDING REMARKS

- The evolution of the **taxpayer's reference group and habit consumption may heavily affect avoidance behaviour**
- **There are objective grounds** for tax authorities **to target taxpayers who are central in the network**
- A tax authority **interventions have a persistent effect** on avoidance, with a return to baseline occurring in around five years

# Thank You!

Questions?

# MODEL

## Relevant parameters and variables:

$t \in (0, 1)$	Linear tax rate
$\phi \in (0, 1)$	Per-unit linear fee on avoided tax
$p_i \in (0, 1)$	Probability of audit
$W_i \in [\underline{W}, \overline{W}]$	Exogenous income
$X_i = (1 - t) W_i$	Honest after-tax income
$A_i \in (0, tW_i)$	Avoided income
$R_i$	Reference Income

# THE AVOIDANCE PROBLEM

**Taxpayer's problem is:**

$$\max_{A_i} \mathbb{E}[U] = (1 - p_i)U(W_i^n - R_i) + p_iU(W_i^a - R_i)$$

After-tax income if not audited

$$W_i^n = X_i + [1 - \phi]A_i$$

After-tax income if audited

$$W_i^a = X_i - \phi A_i$$

Utility is quadratic

$$U(z) = z[b - \frac{az}{2}]$$

**Optimal Avoidance** at an interior solution is:

$$A_i^* = \frac{1 - p_i - \phi}{a\zeta_i} \{a[R_i - X_i] + b\}, \zeta_i > 0$$



## REFERENCE DEPENDENCE

Agents' reference income is a weighted average of habitual income and the average of her reference group

Taxpayer  $i$  expected after-tax income when avoiding  $A_i$  is:

$$q_i = X_i + [1 - p_i - \phi]A_i$$

And the reference income may be expressed as:

$$R_i = \iota_h D_i + \iota_s \sum_{j \neq i} g_{ij} q_j$$

$\iota_h$

Relative importance of habit

$D_i$

Habit income

$\iota_s$

Relative importance of peers

$g_{ij}$

weight of agent  $j$  in  $i$  reference group

# ACCOUNTING FOR SOCIAL NETWORK

Expanding  $A_i^*$  using the definitions of  $R_i$  and  $q_i$   
we solve à la **Cournot-Nash**:

$$A_i = \alpha_i + \iota_s \sum_{j \neq i} g'_{ij} A_j =$$

$$\mathbf{A} = \boldsymbol{\alpha} + \mathbf{G}' \boldsymbol{\beta} \mathbf{A}$$

Where:

$$\alpha_i = \frac{1 - p_i - \phi}{a\zeta_i} \{ a[\iota_h D_i + \iota_s \sum_{j \neq i} g_{ij} X_j - X_i] + b \}$$

$$\boldsymbol{\beta} = \text{Diag}(\iota_s)$$

$$g'_{ij} = \frac{[1 - p_i - \phi][1 - p_j - \phi]}{\zeta_i} g_{ij}$$

# BONACICH CENTRALITY AND AVOIDANCE

The nash equilibrium is then:

$$\mathbf{A} = [\mathbf{I} - \mathbf{G}'\beta]^{-1}\alpha = b(\mathbf{G}', \beta, \alpha)$$

$b(\mathbf{G}', \beta, \alpha)$  is the weighted Bonacich centrality defined on:

$\mathbf{G}'$	Edge weights scaled by agents' relative ER of $A$
$\beta$	Scales weight of longer paths
$\alpha$	Weights centrality by agent characteristics
$[\mathbf{I} - \mathbf{G}'\beta]^{-1}$	Well defined by row-scaling

# TAXPAYERS' INTERACTION AS A GAME

The game arising from taxpayers interaction is:

## Smooth Supermodular Game (Milgrom and Roberts 1990)

Bounds on strategies

$$A_i \in (0, tW_i)$$

Differentiability

$$\mathbb{E}[U]_i \text{ is of class } C^2$$

Strategic Complements

$$\frac{\partial^2 \mathbb{E}[U]_i}{\partial A_i \partial A_j} \geq 0$$

# MONOTONE COMPARATIVE STATICS

**Smooth Supermodular Games** can be analyzed using **Monotone comparative statics**

Following Quah (2007) we exploit the **weaker** condition of **local supermodularity** around the Nash equilibrium point:

Then, for a given parameter  $z$ , it holds:

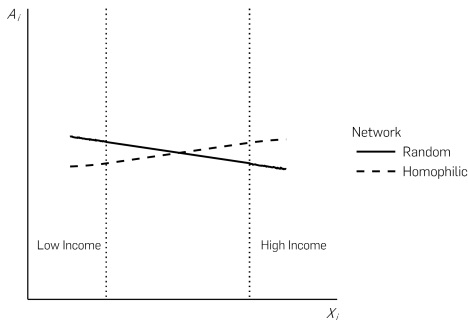
$$\frac{\partial^2 \mathbb{E}[U]_i}{\partial A_i \partial z} \Big|_{A_i=A_i^*} \geq 0 \Leftrightarrow \frac{\partial A_i^*}{\partial z} \begin{cases} > 0 \text{ if } \frac{\partial^2 \mathbb{E}[U]_i}{\partial A_i \partial z} \Big|_{A_i=A_i^*} > 0 \\ \geq 0 \text{ if } \frac{\partial^2 \mathbb{E}[U]_i}{\partial A_i \partial z} \Big|_{A_i=A_i^*} = 0 \end{cases}$$

# MONOTONE COMPARATIVE STATICS

	$A_i^*$		$A_i^*$
$a$	-	$t$	+
$b$	+	$\phi$	+/-
$D_i$	+	$R_i$	+
$p_i$	-	$X_i$	-
$p_j$	-/0	$X_j$	+ / 0
$\iota_h$	+	$\iota_s$	+ / 0

Monotone comparative statics for interior  $A_i^*$

# NETWORK STRUCTURE AND INCOME



The pure effect of  $X_i$  on  $A_i^*$  is negative

However, if:

→  $X_j$  increases with  $X_i$

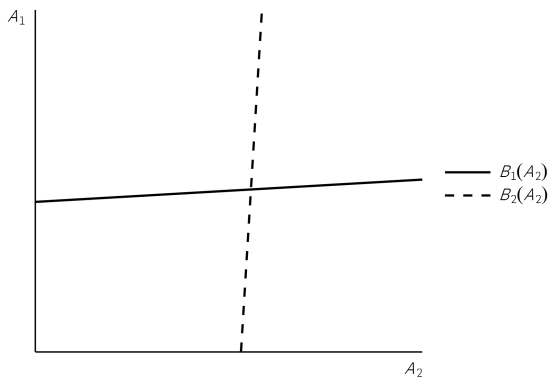
→  $\iota_s$  is high enough

The positive peer-effect may cause a reversal

If taxpayers with similar income tend to **group together** (homophily) and **social comparison plays a relevant role** in shaping reference income, the model predicts **avoidance to be increasing in income**

# BEST RESPONSE

Quadratic utility leads to linear best response



Positive slope of best response functions follows from strategic complementarity in  $A_i, A_j$