

Research Article

# Enhancing Tax Audit Efficiency, Compliance Behaviour, and Dispute Resolution Mechanisms in Modern Tax Systems

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## Abstract

Taxation remains the principal mechanism through which governments mobilise revenue to finance public expenditure and sustain socio-economic development. The effectiveness of a tax system, however, depends not only on the robustness of its legal framework but also on the extent to which taxpayers comply with their obligations in practice. This paper examines the interrelationship between tax audits, tax compliance, and dispute resolution within Ghana's tax administration system, advancing the argument that the current framework is disproportionately enforcement-driven and insufficiently aligned with behavioural and trust-based approaches to compliance. Adopting a doctrinal and analytical methodology, the paper draws on statutory provisions, judicial decisions, administrative practices, and relevant scholarly literature. It analyses tax audits as a central enforcement mechanism, highlighting their roles in detection, deterrence, and revenue mobilisation, while also identifying their limitations when applied in isolation. The paper further explores tax compliance from both legal and behavioural perspectives, emphasising the significance of trust, fairness, and taxpayer engagement in sustaining voluntary compliance. It also examines dispute resolution mechanisms as a critical component of tax administration, underscoring their role in enhancing legitimacy, protecting taxpayer rights, and ensuring adherence to the rule of law. The paper contributes to existing scholarship by advancing an integrated framework that treats tax audits, compliance, and dispute resolution as interdependent elements of a unified system rather than discrete functions. It contends that effective tax administration requires a recalibrated approach that balances enforcement with facilitation and trust. The paper concludes that reforms aimed at simplifying tax processes, strengthening taxpayer rights, improving administrative efficiency, and enhancing dispute resolution mechanisms are essential to achieving sustainable revenue mobilisation, strengthening the fiscal contract, and promoting good governance in Ghana.

## Keywords

Tax Audits, Compliance, Dispute Resolution, Tax Governance, Enforcement, Revenue Administration, Regulatory Efficiency, Tax Policy

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## 1. Introduction

Governments require reliable, predictable, and sustainable sources of revenue to finance public expenditure and fulfil their socio-economic obligations. Such revenue underpins the provision of essential public goods and services, including healthcare, education, transportation infrastructure, and social protection systems, all of which are indispensable to the development of a prosperous, stable, and well-functioning society [1]. In this regard, taxation remains the most significant and enduring source of government revenue. Beyond its fiscal function, taxation also performs important redistributive and regulatory roles, contributing to economic equity and influencing behaviour in areas such as investment, consumption, and environmental protection [2].

Taxation further serves as a critical instrument for strengthening the social contract between the state and its citizens. The legitimacy of governmental authority is often closely tied to the perceived fairness, transparency, and efficiency of the tax system [3]. Where tax systems are administered in a manner that is equitable and accountable, public trust in state institutions is enhanced. Conversely, weak tax administration, opacity in revenue utilisation, and arbitrary enforcement measures may erode confidence in government and undermine voluntary compliance [5]. It is therefore imperative that tax systems are designed and administered in a manner that promotes accountability, transparency, and adherence to the rule of law [5].

Within this broader framework, tax audits, compliance mechanisms, and dispute resolution processes constitute essential pillars of an effective tax administration system [6]. Tax compliance refers to the extent to which taxpayers meet their legal obligations, including the accurate reporting of income, proper calculation of tax liabilities, timely filing of returns, and prompt payment of taxes due [7]. Achieving high levels of voluntary compliance is a primary objective of tax authorities, as it reduces enforcement costs and enhances revenue mobilisation. However, compliance cannot be assumed and must be actively supported through a combination of taxpayer education, clear legislative frameworks, and robust administrative practices [8].

Tax audits play a central role in ensuring compliance and safeguarding the integrity of the tax system. Through systematic examination of taxpayers' financial records and transactions, tax authorities are able to detect errors, underreporting, and deliberate tax evasion [9]. Audits also serve a deterrent function, signalling to taxpayers that non-compliance carries a significant risk of detection and sanction [9]. At the same time, modern approaches to tax auditing increasingly emphasise risk-based methodologies, data analytics, and cooperative compliance models, which seek to balance enforcement with facilitation [9].

Despite the existence of comprehensive compliance and audit frameworks, disputes between taxpayers and tax authorities are inevitable. Such disputes may arise from differences

in the interpretation of tax laws, disagreements over the assessment of tax liabilities, or procedural concerns in the conduct of audits and enforcement actions. An effective tax system must therefore incorporate clear, fair, and accessible dispute resolution mechanisms that allow taxpayers to challenge assessments and seek redress. These mechanisms may include administrative reviews, objection procedures, alternative dispute resolution methods, and recourse to judicial processes.

In the context of Ghana, taxation assumes heightened importance as a tool for promoting fiscal independence and sustainable economic development. Domestic revenue mobilisation reduces reliance on external borrowing and donor assistance, thereby enhancing national sovereignty and economic resilience. It enables the Government of Ghana to implement development policies, respond to macroeconomic shocks, and invest in long-term national priorities such as industrialisation, infrastructure expansion, and digital transformation. The Ghana Revenue Authority, as the principal tax administration body, plays a pivotal role in this regard by enforcing compliance, conducting audits, and managing disputes in accordance with the law.

Notwithstanding these efforts, challenges remain, including issues of tax base erosion, informality within the economy, capacity constraints, and occasional tensions between taxpayers and the revenue authority. Addressing these challenges requires a balanced approach that combines effective enforcement with taxpayer engagement, legal certainty, and institutional transparency. Ultimately, a well-functioning system of tax audits, compliance, and dispute resolution is indispensable not only for revenue generation but also for fostering a culture of accountability, strengthening governance, and supporting sustainable national development.

A substantial body of literature has examined the role of tax audits, compliance, and dispute resolution within modern tax systems. Traditional scholarship on tax administration has largely emphasised enforcement-based models of compliance, focusing on the deterrent effects of audits, penalties, and legal sanctions. Foundational economic analyses conceptualise taxpayers as rational actors who respond to the probability of detection and the severity of punishment, thereby framing compliance primarily as a function of enforcement intensity. More recent literature has expanded this perspective by incorporating behavioural and institutional dimensions of compliance. Studies grounded in behavioural economics and public finance highlight the importance of tax morale, social norms, perceived fairness, and trust in government as key determinants of voluntary compliance. The development of frameworks such as the enforcement–facilitation–trust model reflects a growing recognition that effective tax administration requires a balance between coercive and non-coercive strategies.

In parallel, scholarship on tax dispute resolution has fo-

cused on procedural fairness, access to justice, and the efficiency of administrative and judicial mechanisms. Comparative studies have examined the structure of objection procedures, the role of tax tribunals, and the increasing use of alternative dispute resolution mechanisms in various jurisdictions. These studies underscore the importance of dispute resolution systems in maintaining the legitimacy of tax administration and ensuring consistency in the interpretation of tax laws.

Despite these contributions, three notable gaps remain. First, much of the existing literature treats tax audits, compliance, and dispute resolution as analytically distinct components, rather than as interdependent elements of a unified system. As a result, insufficient attention has been paid to how weaknesses in one area, particularly dispute resolution, may undermine the effectiveness of enforcement and compliance strategies. Second, while behavioural approaches to tax compliance are well developed in the abstract, their integration into the practical design of tax administration systems in developing economies remains underexplored. In particular, there is limited analysis of how enforcement-driven systems may inadvertently erode trust and reduce voluntary compliance over time. Third, within the Ghanaian context, existing studies tend to focus on specific aspects of tax administration, such as compliance levels, taxpayer perceptions, or the legal framework governing audits, without offering a comprehensive and integrated evaluation of how these elements interact in practice.

This paper addresses these gaps by advancing an integrated analysis of tax audits, compliance, and dispute resolution within Ghana's tax system. It argues that the current framework is disproportionately oriented towards enforcement and insufficiently aligned with behavioural and trust-based approaches to compliance. By examining the interaction between these three pillars, the paper contributes to the literature by demonstrating that effective tax administration requires not only strong enforcement mechanisms but also credible dispute resolution processes and sustained efforts to build taxpayer trust. In doing so, it provides a normative framework for reform that is both context-specific and aligned with broader developments in contemporary tax scholarship.

## 2. Tax Audits

Tax auditing constitutes a central pillar of contemporary tax administration and plays a vital role in ensuring compliance, safeguarding revenue, and maintaining the integrity and credibility of the fiscal system. At its conceptual foundation, auditing has been defined as an independent examination and investigation of the evidence underlying financial statements, undertaken with the objective of forming an opinion as to whether such statements are properly prepared and present a true and fair view of the matters they purport to represent [10]. Although this definition is rooted in financial auditing, its core elements, namely independence, objectivity, professional scepticism, and reliance on verifiable evidence, are equally applicable in the context of tax audits. Tax audits adopt these

principles in order to assess whether taxpayers have complied with statutory obligations relating to the assessment, declaration, and payment of taxes.

Within the Ghanaian legal framework, the authority to conduct tax audits is conferred on the Commissioner-General under section 36 of the Revenue Administration Act, 2016 (Act 915), as amended. The Act grants the revenue authority the power to examine, investigate, and review the tax affairs of individuals, partnerships, and corporate entities. The breadth of this authority reflects the necessity of equipping tax administrators with adequate tools to enforce compliance in an increasingly complex and dynamic economic environment. Nonetheless, the exercise of audit powers is subject to legal and administrative constraints grounded in the principles of legality, proportionality, and procedural fairness. These safeguards are essential to ensuring that the audit process does not become arbitrary or oppressive but remains aligned with the rule of law and in accordance with Article 23 of the Constitution of the Republic of Ghana, 1992.

The selection of taxpayers for audit is a critical stage in the audit lifecycle, and is typically guided by risk-based methodologies. Modern tax administrations, including the Ghana Revenue Authority, increasingly rely on data-driven approaches to identify taxpayers who present a higher likelihood of non-compliance. Factors considered in this process include the taxpayer's historical compliance behaviour, the size and nature of their tax liabilities, the complexity of their financial arrangements, and the sector within which they operate. Particular attention may be paid to industries that are cash-intensive, highly fragmented, or prone to informality. In addition to these indicators, compliance management plans, third-party information, and intelligence gathered through inter-agency cooperation play a significant role in shaping audit selection decisions. Random audits may also be conducted to preserve the deterrent effect of the system and to test the overall level of compliance within the taxpayer population.

A tax audit may be broadly described as a systematic, structured, and evidence-based examination of a taxpayer's financial records and related information for the purpose of determining whether tax obligations have been properly fulfilled [11]. This process extends beyond a mere verification of numerical accuracy and encompasses a comprehensive evaluation of the legal, economic, and factual basis of the taxpayer's reported position. Auditors typically review accounting records, invoices, contracts, bank statements, payroll records, and other relevant documentation to reconstruct the taxpayer's financial activities within a defined period. Increasingly, audits also involve the analysis of electronic records and the use of digital tools to detect anomalies, patterns, and inconsistencies.

The scope of a tax audit is inherently broad and may cover multiple tax types, including income tax, value added tax, withholding tax, customs duties and other statutory levies. In undertaking this examination, auditors assess whether income has been fully declared, whether deductions and exemptions have been properly claimed in accordance with the law,

whether correct values of imported items have been properly declared for customs duty purposes, and whether applicable tax rates and rules have been correctly applied. The audit process, therefore, involves both factual verification and legal interpretation. It requires auditors to exercise professional judgement in evaluating complex transactions, particularly in areas such as transfer pricing, related-party dealings, and the classification of income and expenses.

Tax audits also perform an important deterrent and corrective function within the tax system. By increasing the probability of detection, audits discourage intentional non-compliance and encourage taxpayers to adhere to their obligations voluntarily. At the same time, they provide an opportunity for the tax authority to correct errors, whether arising from inadvertence, negligence, or deliberate misrepresentation. Where discrepancies are identified, the audit process enables the assessment of additional tax liabilities, together with applicable penalties and interest. In this sense, tax audits contribute not only to compliance enforcement but also to revenue mobilisation, particularly in jurisdictions where the tax base is narrow or where informality is prevalent.

In comparison with other compliance mechanisms, tax audits are generally more comprehensive and intrusive. While desk reviews and automated data matching exercises rely primarily on information already available to the tax authority, audits often involve direct engagement with the taxpayer and a detailed examination of underlying records. This may include site visits, interviews with key personnel, and requests for supplementary information. However, the scope and intensity of an audit may vary depending on the level of risk identified. In some cases, limited-scope audits focusing on specific issues may be conducted, while in others, full-scope audits encompassing the entirety of the taxpayer's affairs may be warranted.

The statutory requirement under section 28(1) of the Revenue Administration Act, 2016 (Act 915) that tax returns be both complete and accurate provides a benchmark for evaluating compliance during an audit. A return is considered complete when all relevant sections have been duly filled, all sources of income and allowable deductions have been disclosed, and the required supporting documentation has been submitted in the prescribed format. Accuracy, in turn, requires that the information provided corresponds faithfully with the taxpayer's actual financial position and transactions. The audit process is therefore directed at identifying both omissions and misstatements, as well as assessing the reliability of the records upon which the return is based. Where a return meets these criteria, it may be accepted without adjustment, although it remains subject to verification.

Procedural fairness is a defining feature of the tax audit framework in Ghana. The requirement that the Commissioner-General provide prior notice of an audit ensures that taxpayers are afforded adequate time to prepare and to organise relevant documentation. This aligns with broader principles of natural justice, including the right to be heard and the right to a fair

administrative process. Audits may be conducted under more than one tax law where necessary, reflecting the interconnected nature of tax obligations. Furthermore, the law permits the re-audit of a taxpayer where reasonable grounds exist, such as the emergence of new evidence or the identification of material errors in a previous audit.

The audit process typically culminates in the preparation of a detailed audit report, which sets out the findings, analysis, and conclusions of the auditor. This report serves as the basis for any subsequent tax assessment and is therefore a document of considerable legal significance. It ordinarily includes a breakdown of the periods under review, the methodology employed in the audit, the computation of any additional tax liabilities, and the application of penalties and interest. The report also identifies the evidentiary basis for the conclusions reached, including reference to supporting documents and, where applicable, expert opinions.

An important procedural safeguard within the audit framework is the issuance of a draft or interim report, which provides the taxpayer with an opportunity to review and respond to the proposed findings. This stage facilitates dialogue between the taxpayer and the revenue authority and allows for the clarification of issues, submission of additional evidence, and correction of misunderstandings. It reflects a growing recognition that effective tax administration should incorporate elements of cooperation and transparency, rather than relying solely on adversarial enforcement.

Following the finalisation of the audit report, the taxpayer is typically required to settle any assessed liabilities within a specified period, commonly thirty days. Failure to do so may result in the imposition of interest and the initiation of enforcement measures, including recovery proceedings. However, the taxpayer retains the right to challenge the assessment through established objection and dispute resolution mechanisms. In practice, taxpayers may be required to pay any undisputed portion of the liability as a condition for pursuing a challenge in respect of the disputed amount. This requirement seeks to balance the need for timely revenue collection with the protection of taxpayer rights.

The relationship between tax audits and dispute resolution processes is both direct and significant. While audits are designed to identify and correct non-compliance, disputes often arise where there is disagreement regarding the interpretation of tax laws or the application of those laws to specific facts. A well-functioning tax system must therefore ensure that audit outcomes are subject to review through fair, transparent, and accessible dispute resolution mechanisms. This not only enhances the legitimacy of the tax system but also promotes consistency and predictability in the application of tax laws.

From a broader policy perspective, tax audits contribute to the strengthening of governance and institutional accountability. By promoting compliance and deterring evasion, they enhance the capacity of the state to mobilise domestic resources and to finance development priorities. In the Ghanaian context, where domestic revenue mobilisation is critical to reducing

dependence on external financing, the effectiveness of the audit function assumes particular importance. At the same time, the conduct of audits must be carefully managed to avoid imposing undue burdens on taxpayers or discouraging economic activity. Striking an appropriate balance between enforcement and facilitation remains a key challenge for tax administrations.

## 2.1. Operationalising Tax Audits in Ghana

While the conceptual foundations of tax auditing emphasise its role as a mechanism for detection, deterrence, and revenue protection, the effectiveness of audits ultimately depends on how these theoretical objectives are operationalised in practice. The transition from theory to practice reveals that tax audits are not merely instruments of enforcement but structured administrative processes that engage both the authority of the state and the rights and responsibilities of taxpayers.

From a theoretical perspective, tax audits are designed to influence taxpayer behaviour by increasing the perceived probability of detection and reinforcing the consequences of non-compliance. However, behavioural insights demonstrate that the effectiveness of audits extends beyond deterrence. The manner in which audits are conducted, including their transparency, consistency, and fairness, plays a critical role in shaping taxpayer perceptions and, consequently, compliance outcomes. An audit process that is perceived as arbitrary or excessively burdensome may undermine trust and reduce voluntary compliance, even where enforcement is strong.

It is within this context that the practical dimensions of tax auditing assume significance. The audit process in Ghana reflects an attempt to translate these theoretical principles into a structured framework that balances enforcement with procedural fairness. Stages such as pre-audit engagement, entry conferences, evidence gathering, draft reporting, and opportunities for taxpayer response are not merely administrative formalities. Rather, they serve as mechanisms through which the principles of legality, transparency, and accountability are realised in practice. Furthermore, the responsibilities imposed on taxpayers during the audit process, including record-keeping, cooperation, and accurate reporting, are directly linked to the theoretical emphasis on compliance as both a legal obligation and a behavioural outcome. At the same time, procedural safeguards, such as the right to respond to audit findings and to challenge assessments, reflect the broader requirement that enforcement must operate within the bounds of the rule of law.

The interaction between audit theory and practice, therefore, highlights a central theme of this paper: that tax audits are most effective when they function not solely as coercive tools but as part of an integrated system that incorporates enforcement, facilitation, and trust. The practical audit processes illustrate how this balance is pursued within the Ghanaian tax administration framework, while also revealing the challenges that arise when enforcement mechanisms are not sufficiently aligned with taxpayer rights and behavioural considerations.

## 2.2. Tax Audit Process and Taxpayer Responsibilities in Ghana

The audit process in Ghana reflects a structured interaction between the Ghana Revenue Authority and the taxpayer, within which both procedural safeguards and compliance obligations are engaged. Understanding the stages of a tax audit and the corresponding responsibilities of taxpayers is therefore essential to ensuring both compliance and fairness in tax administration.

### 2.2.1. Pre-audit Preparation and Internal Review

Prior to the commencement of an audit, prudent taxpayers are expected to undertake internal pre-audit reviews to ensure the accuracy and consistency of their tax positions. This involves reconciling accounting profit with taxable profit, aligning value added tax (VAT) returns with underlying sales records, and ensuring consistency between payroll records and Pay-As-You-Earn (PAYE) filings. Particular attention is typically directed at high-risk areas, including under-declaration of income, incorrect VAT treatment, failure to withhold taxes, and unsupported expenses. In practice, a significant proportion of audit adjustments in Ghana arise from errors relating to withholding tax, VAT, and PAYE obligations. This underscores the importance of robust internal controls and periodic self-assessment as preventive measures. The increasing use of risk-based audit selection by the Ghana Revenue Authority further heightens the need for taxpayers to maintain accurate and consistent records, as weaknesses in compliance systems may increase the likelihood of audit selection.

### 2.2.2. Compliance with Filing and Payment Obligations

Taxpayers are under a continuing obligation to ensure full compliance with statutory filing and payment requirements. This includes the timely submission of tax returns, the accurate declaration of liabilities, and the prompt payment of taxes due or the proper arrangement of outstanding liabilities. Consistency between monthly and annual filings is particularly important, as discrepancies may trigger audit scrutiny. The adoption of digital tax administration tools, including electronic VAT systems and certified invoicing platforms, has introduced additional compliance expectations. Taxpayers are therefore required to align their internal systems with regulatory requirements and ensure that transactions are properly captured and reported in accordance with applicable guidelines.

### 2.2.3. Preparation for Audit Engagement

Given the investigative nature of tax audits, taxpayers must be prepared to provide clear and substantiated explanations for key transactions. This includes large or unusual transactions, related-party dealings, fluctuations in profitability, and spe-

cific tax positions adopted. The ability to present coherent explanations supported by documentary evidence is critical to the audit process. Taxpayers may designate representatives, including legal practitioners or tax advisors, to interface with auditors. This not only facilitates effective communication but also ensures that the taxpayer's rights are protected throughout the audit process.

#### 2.2.4. Entry Conference and Scope of Audit

The audit process typically commences with an entry conference between the audit team and the taxpayer or the taxpayer's representative. This meeting serves to establish the scope, timeline, and logistics of the audit. It also provides an opportunity for the auditors to gain an initial understanding of the taxpayer's operations, accounting systems, and internal controls. At this stage, auditors are entitled to access the taxpayer's premises, records, and electronic systems, including warehouses, sales outlets, and production facilities where relevant. While this access is necessary for effective verification, it must be exercised within the bounds of the law and in accordance with principles of proportionality and fairness.

#### 2.2.5. Conduct of the Audit

During the audit, taxpayers are required to cooperate with auditors by providing requested documentation and facilitating access to relevant information. At the same time, taxpayers retain the right to ensure that requests are reasonable and within the scope of the audit. Maintaining a clear record of all documents provided to auditors is an important aspect of audit management. A central audit file is typically prepared, containing financial records such as audited financial statements, trial balances, general ledgers, and accounting journals. This is complemented by tax records, including filed returns, payment receipts, and tax clearance certificates, as well as supporting documentation such as invoices, contracts, payroll records, asset registers, and bank statements. Proper record-keeping is therefore fundamental to the success of the audit process.

The role of the taxpayer's representative is particularly significant at this stage. Effective representation ensures that responses to audit queries are accurate, consistent, and legally sound, thereby reducing the risk of adverse findings.

#### 2.2.6. Exit Conference and Audit Findings

Upon completion of the audit, an exit conference is typically held to communicate preliminary findings and to provide an opportunity for discussion and clarification. This stage serves not only to conclude the audit process but also to enhance taxpayer understanding of relevant legal provisions and compliance expectations. Following this, the tax authority issues a draft or interim report outlining proposed adjustments. The taxpayer is afforded an opportunity to review the findings and respond, including by submitting additional evidence or

clarifications. This stage reflects an important procedural safeguard, allowing taxpayers to engage with the audit outcome before it is finalised.

#### 2.2.7. Final Report and Assessment

The final audit report constitutes a comprehensive record of the audit findings, including the relevant periods under review, the legal basis for adjustments, and the computation of tax liabilities, penalties, and interest. It also identifies the evidentiary materials relied upon and, where applicable, any expert opinions considered in the determination of liability. The issuance of the final report is typically accompanied by a notice of assessment, which formally communicates the taxpayer's liability. Taxpayers are generally required to settle the assessed amount within a specified period, often thirty days, failing which interest may accrue.

#### 2.2.8. Post-audit Rights and Obligations

Importantly, the conclusion of an audit does not extinguish the taxpayer's rights. Where a taxpayer disagrees with the assessment, they are entitled to object within the prescribed period, usually thirty days from notification. In doing so, taxpayers may be required to pay any undisputed portion of the liability while contesting the remainder. This post-audit phase illustrates the interaction between audit processes and dispute resolution mechanisms. It reinforces the principle that while taxpayers are obligated to comply with tax laws, they are equally entitled to challenge assessments and seek redress through established legal procedures.

Tax audits are thus an indispensable component of an effective and equitable tax system. They perform multiple functions, including compliance verification, revenue enhancement, deterrence of non-compliance, and the reinforcement of accountability. When conducted within a framework that emphasises legality, transparency, and fairness, tax audits contribute not only to fiscal outcomes but also to the broader objectives of good governance, economic stability, and sustainable development.

### 3. Tax Compliance

Ghana's 1992 Constitution provides under Article 41(j) that the exercise and enjoyment of rights and freedoms is inseparable from the performance of duties and obligations, and accordingly, it shall be the duty of every citizen to declare his income honestly to the appropriate and lawful agencies and to satisfy all tax obligations. Tax compliance, as a concept, constitutes a foundational pillar of any effective and credible tax administration framework. The issue of compliance has accompanied taxation since its inception and continues to occupy a central position in fiscal policy and administration across jurisdictions. At its core, tax compliance concerns the extent to which taxpayers adhere to statutory obligations, and the persistent challenge for governments lies in understanding

the drivers of compliance and non-compliance, as well as designing appropriate legal and administrative responses. Consequently, the study of tax compliance has evolved into a multidisciplinary field, drawing from public finance, law, economics, behavioural science, and ethics.

Scholarly definitions of tax compliance reflect its multidimensional character. Tax compliance is conceptualised in some regards as the accurate reporting of tax liabilities and the timely filing of returns in accordance with applicable legal rules and judicial interpretations [12]. Its behavioural dimension is emphasised when defined as the willingness of taxpayers to obey tax laws in a manner that supports economic equilibrium [13]. The concept is broadened as the degree to which taxpayers fulfil their legal obligations, including declaring income, filing returns, and paying taxes within prescribed timeframes [13].

Taken together, these definitions highlight several essential elements of tax compliance, notably obedience to legal requirements, the capacity or ability to comply, and the willingness or intention to do so. Compliance is therefore not merely a mechanical or procedural exercise; it is also behavioural and attitudinal. It involves both the technical accuracy of tax reporting and the broader disposition of taxpayers towards the tax system. This dual character underscores the importance of adopting a holistic approach to compliance, one that integrates legal enforcement with measures aimed at influencing taxpayer behaviour [13].

From an analytical perspective, tax compliance may be examined through two complementary lenses. The first is the conceptual or *ex ante* approach, which focuses on the taxpayer's intention to comply [14]. This perspective is grounded in behavioural and psychological considerations, including trust in government, perceived fairness of the tax system, social norms, and moral obligations. It assumes that compliance is, to a significant extent, voluntary and influenced by intrinsic motivations rather than solely by external enforcement.

Integrating a behavioural perspective into tax compliance provides a useful basis for explaining and strengthening a society's fiscal contract, which is founded on the reciprocal trust between taxpayers and the state [15]. The Innovations in Tax Compliance framework identifies three principal pillars for building robust fiscal contracts, namely enforcement, facilitation, and trust, all of which can be enhanced through behavioural insights [16]. Enforcement encompasses the mechanisms used to detect, deter, and sanction non-compliance. Facilitation focuses on reducing transaction costs and improving service delivery in order to make compliance more accessible and efficient.

Trust, on the other hand, captures the motivations underpinning compliance at different levels and is closely associated with tax morale, understood as the intrinsic and extrinsic willingness to pay taxes [15]. Behavioural insights can be applied across these core functions of revenue administration by improving decision-making frameworks, enhancing the salience and credibility of information, and strengthening interactions

between taxpayers and tax authorities. Central to this approach is the use of evidence to deepen understanding of human behaviour, thereby enabling policymakers to address complex development challenges more effectively [15].

Attitudes, beliefs, and cognitive frameworks play a critical role in shaping how policymakers respond to such challenges, and analysing their relationship with behaviour is essential for designing effective interventions. Evidence provides not only an indication of what works, but also insight into how, why, and for whom particular approaches are effective. A more comprehensive understanding of both challenges and potential solutions, grounded in empirical evidence, can significantly enhance policy design and implementation hence adopting a more holistic perspective on taxpayer behaviour can lead to substantial improvements in compliance outcomes [15].

The second lens is the operational or *ex post* approach, which focuses on the actual fulfilment of tax obligations in practice [17]. This includes registration with the relevant tax authority, accurate filing of returns, proper reporting of income and deductions, and timely payment of taxes due. Unlike the conceptual approach, the operational perspective reflects the role of enforcement mechanisms such as audits, penalties, and legal sanctions. It is this approach that is most commonly adopted by tax authorities and international organisations in measuring and managing compliance [18].

Within the Ghanaian context, the legal framework governing tax compliance is principally established under the Revenue Administration Act, 2016 (Act 915), the Income Tax Act, 2015 (Act 896), the Customs Act, 2015 (Act 891), and the Value Added Tax Act 2025 (1151) with their necessary amendments. These statutes impose clear and enforceable obligations on taxpayers, thereby defining the minimum standards of compliance required under the law. Key obligations include the requirement under section 10 of Act 915 to register with the Ghana Revenue Authority and obtain a Tax Identification Number. A taxpayer is also duty-bound by sections 117 and 124 of Act 896, as well as section 59 of Act 1151, to file accurate and complete tax returns within prescribed timelines. The obligation to pay all taxes due when they become payable under section 46 of Act 915, as well as the requirement to maintain proper financial records for a minimum statutory period of six years under section 27(3) of Act 915, are necessary for purposes of complying with the tax law. In addition, taxpayers are under a continuing obligation under section 28 of Act 915 to provide truthful and accurate information to tax authorities and to refrain from making false or misleading statements in the course of their dealings with tax officials.

The Ghana Revenue Authority has, in recent years, undertaken significant reforms aimed at strengthening compliance and modernising tax administration. A notable development in this regard is the adoption of digital technologies, including deploying artificial intelligence, electronic filing and payment systems, which have streamlined compliance processes, reduced administrative burdens, and improved the accuracy and

efficiency of tax administration. These technological innovations are complemented by taxpayer education and outreach programmes designed to enhance awareness of tax obligations and to promote voluntary compliance [19]. Such initiatives recognise that taxpayers are more likely to comply where they understand their obligations and possess the necessary skills to meet them [18].

The role of taxpayer education in promoting compliance cannot be overstated. Empirical studies consistently demonstrate that increased knowledge of tax laws and procedures enhances taxpayers' ability to comply and reduces the incidence of unintentional errors [18]. Education initiatives also contribute to shaping positive attitudes towards taxation by fostering a sense of civic responsibility and reinforcing the link between tax payments and public service delivery [20]. In a diverse socio-economic context, such as Ghana, the effectiveness of such initiatives may be further enhanced by the use of local languages and culturally appropriate communication strategies, thereby ensuring broader accessibility and inclusiveness.

The design and complexity of the tax system itself also exerts a significant influence on compliance behaviour. Complex, ambiguous, or frequently changing tax rules tend to increase compliance costs and create opportunities for both inadvertent errors and deliberate evasion [21]. High compliance costs are often associated with the expansion of the informal sector, reduced levels of investment, and increased susceptibility to corrupt practices [22]. Conversely, tax systems that are simple, transparent, and predictable are more likely to encourage voluntary compliance, facilitate business operations, and promote economic growth. Simplicity and clarity in tax legislation, therefore, represent critical objectives for policymakers seeking to improve compliance outcomes [4].

Equally important is the effectiveness of tax administration in enforcing compliance. While administrative efficiency, understood as the minimisation of collection costs, is an important consideration, it does not necessarily equate to effectiveness. An efficient tax administration that fails to detect or deter non-compliance cannot achieve its fundamental objectives [23]. Effective tax administration requires a balanced approach that combines facilitative measures, such as taxpayer services and guidance, with robust enforcement mechanisms, including audits, investigations, and the consistent application of penalties. The perceived likelihood of detection and the severity of sanctions are particularly significant in influencing taxpayer behaviour, as they shape the cost-benefit analysis underlying decisions to comply or evade.

At the same time, compliance is influenced by broader governance considerations. Taxpayers are more likely to comply voluntarily where they perceive the tax system to be fair, the administration to be impartial, and public funds to be utilised responsibly [24]. Transparency in public financial management, accountability in government expenditure, and equitable application of tax laws all contribute to building trust in the system. Conversely, perceptions of corruption, inefficiency, or inequity may undermine compliance, even in the

presence of strong enforcement mechanisms. This underscores the importance of viewing tax compliance not merely as a technical issue but as an integral component of governance and state legitimacy [24].

The legal framework in Ghana provides for a range of sanctions in cases of non-compliance, as set out under sections 71 to 78 of Act 915. These include administrative penalties, the imposition of interest on unpaid taxes, and, in appropriate circumstances, criminal prosecution. Such measures serve both corrective and deterrent functions, reinforcing the importance of compliance and signalling the consequences of noncompliant behaviour. However, the effectiveness of these sanctions depends on their consistent and fair application, as well as the broader credibility of the tax administration system [24].

Furthermore, it is important to recognise the dynamic relationship between tax compliance, tax audits, and dispute resolution. Audits serve as a primary tool for detecting noncompliance [11], while dispute resolution mechanisms provide taxpayers with avenues to challenge assessments and seek redress [25]. Together, these elements form an integrated framework that balances enforcement with fairness and accountability. A well-functioning compliance system, therefore, requires not only robust audit processes but also transparent and accessible dispute resolution mechanisms that uphold the rights of taxpayers [26].

Tax compliance is therefore a complex and multifaceted phenomenon shaped by legal, administrative, economic, and behavioural factors. It is both a statutory obligation and a reflection of the broader relationship between the state and its citizens. Achieving high levels of compliance requires a comprehensive approach that integrates clear legal frameworks, effective administration, taxpayer education, and sound governance practices. When these elements are properly aligned, tax compliance contributes not only to enhanced revenue mobilisation but also to the strengthening of institutional legitimacy, economic stability, and sustainable national development.

## 4. Rights, Privileges and Obligations of Taxpayers in Ghana

The effectiveness and legitimacy of any tax system depend on the careful balance between the obligations imposed on taxpayers and the rights and protections afforded to them. Taxation, by its nature, involves the compulsory extraction of resources by the state. As such, it must operate within a framework that ensures fairness, accountability, and adherence to the rule of law. In Ghana, this balance is achieved through a combination of constitutional principles, statutory provisions, and judicial interpretation, which collectively define the rights, privileges, and obligations of taxpayers.

### 4.1. Obligations of Taxpayers

The starting point of the taxpayer-state relationship is the

recognition that taxation is a legal and civic duty. As earlier discussed, the Constitution of the Republic of Ghana, 1992, provides that it is the duty of every citizen to declare income honestly to the appropriate authorities and to satisfy all tax obligations. This constitutional duty is given effect through statutory provisions, particularly under the Revenue Administration Act, 2016 (Act 915), the Income Tax Act, 2015 (Act 896), the Customs Act, 2015 (Act 891), and the Value Added Tax Act, 2025 (Act 1151). Taxpayers are required to register with the Ghana Revenue Authority and obtain a Tax Identification Number, file accurate and complete tax returns within prescribed timelines, pay taxes due when they become payable, and maintain proper financial records for a statutory period. In addition, taxpayers are under a continuing obligation to provide truthful and accurate information and to refrain from making false or misleading statements in their dealings with tax authorities. These obligations are fundamental to the functioning of the tax system, as they ensure the integrity of revenue collection and support the broader objectives of public finance and economic governance.

## 4.2. Rights of Taxpayers

Balanced against these obligations are a range of rights designed to protect taxpayers from arbitrary or excessive administrative action. These rights are rooted in constitutional guarantees of administrative justice and are further elaborated through statutory provisions and judicial decisions. A central constitutional safeguard is the requirement under Article 23 that administrative bodies act fairly and reasonably and comply with the requirements imposed by law. This principle applies directly to the Ghana Revenue Authority in the exercise of its powers. Judicial interpretation has reinforced this position. In *Hippo Limited v Commissioner-General, Ghana Revenue Authority* [2020] DLHC 8911, the High Court affirmed that taxpayers have the right to object to tax assessments, to submit supporting documentation, and to expect that such objections will be considered promptly and fairly. The Court clarified that while a hearing is not required prior to an assessment, taxpayers must be afforded a meaningful opportunity to be heard after the assessment has been issued.

The appellate courts have further strengthened the protection of taxpayer rights. In *Perseus Mining (Ghana) Limited v Commissioner-General, Ghana Revenue Authority, Suit No. HI/137/2022*, the court emphasised that the position of the revenue authority is not the standard for determining tax liability. Rather, the applicable law is the controlling standard. This principle underscores the supremacy of law over administrative discretion and provides an important safeguard against arbitrary decision-making.

From these constitutional and judicial foundations, several core taxpayer rights emerge. These include the right to be informed of tax liabilities and decisions, the right to be heard in

relation to disputed assessments, the right to object and appeal, and the right to fair and reasonable administrative action. Statutory provisions under the Revenue Administration Act reinforce these rights by providing for the confidentiality of taxpayer information, access to relevant information, and the ability to request extensions of time for compliance.

## 4.3. Privileges of Taxpayers

In addition to rights, taxpayers benefit from certain legal privileges that enhance their ability to engage effectively with the tax system. One of the most significant is the right to representation. Taxpayers are entitled to appoint legal practitioners, accountants, or other authorised agents to act on their behalf in dealings with the tax authority. This privilege is particularly important in light of the technical complexity of tax law and the potential consequences of non-compliance. Closely associated with the right to representation is the doctrine of legal professional privilege. This evidentiary rule protects confidential communications between a lawyer and a client from disclosure. Historically developed to prevent lawyers from being compelled to testify against their clients, the privilege now serves a broader purpose by encouraging full and frank communication. In the context of taxation, legal professional privilege enables taxpayers to seek advice and representation without fear that sensitive information will be disclosed to the tax authority or other parties. This protection is essential to ensuring effective legal representation and maintaining confidence in the legal system. Another important privilege arises from procedural safeguards within the tax administration process. These include the opportunity to respond to draft audit findings, the right to challenge assessments through established objection and appeal mechanisms, and access to independent adjudication through the courts. Such privileges contribute to a more balanced and transparent system by allowing taxpayers to actively participate in the determination of their tax liabilities.

The rights, privileges, and obligations of taxpayers are not isolated elements but are interdependent components of a coherent legal framework. Obligations ensure that taxpayers contribute to the financing of public goods, while rights and privileges ensure that such contributions are demanded and enforced in a lawful and fair manner. Where this balance is maintained, taxpayer confidence is enhanced, and voluntary compliance is more likely to be achieved.

However, where obligations are emphasised without corresponding respect for rights and privileges, the legitimacy of the tax system may be undermined. Excessive reliance on enforcement, procedural complexity, and delays in dispute resolution may erode trust and discourage compliance. Conversely, a system that effectively protects taxpayer rights while ensuring compliance obligations are met is more likely to achieve sustainable revenue mobilisation.

## 5. Dispute Resolution in Tax Administration

Due to the central role taxes play, every State puts in place mechanisms to optimise tax collection. In doing so, it is imperative that States consciously make efforts to develop a good tax system. Particularly, the canon of equity requires that the tax system should be fair in respect of tax distribution and burden. Where taxpayers do not find the tax system to be fair, they may resist the payment of tax or fail to comply with tax laws. By way of evolution, modern tax systems, among others, focus on tax policy planning, tax administration and enforcement, tax compliance and tax dispute resolution [27]. Whilst tax administrators are to ensure compliance with the tax laws, it is only appropriate to take cognisance of the fact that disputes with taxpayers are inevitable [28]. Dispute resolution is therefore an indispensable element of a well-functioning tax system, providing the institutional framework through which disagreements between taxpayers and tax authorities are addressed in a manner that is orderly, fair, and consistent with the rule of law.

The fundamental mandate of tax administrations globally is to secure compliance with tax legislation through the accurate assessment, collection, and enforcement of taxes. In the discharge of this mandate, tax authorities routinely review tax returns, examine financial records, and verify payments made by taxpayers. This oversight function frequently results in the identification of discrepancies, including underreported income, disallowed deductions, or incorrect tax treatments, which may give rise to additional assessments, penalties, and interest. Given the technical complexity of tax law and the diversity of commercial transactions, disputes between taxpayers and revenue authorities are an inherent and unavoidable feature of tax administration.

Consequently, the availability of effective dispute resolution mechanisms is critical to maintaining the legitimacy and functionality of the tax system. It is not in doubt that dispute resolution mechanisms perform the dual role of facilitating the timely collection of revenue by providing structured processes for resolving disagreements without undue delay and protecting taxpayers from arbitrary or excessive assessments by ensuring that tax liabilities are determined strictly in accordance with the law [29, 30]. From a governance perspective, dispute resolution enhances transparency, accountability, and public confidence in the administration of tax laws. It reinforces the perception that tax authorities exercise their powers within defined legal limits and are subject to oversight and review [4, 29, 30].

The principal objective of tax dispute resolution procedures is to ensure that taxes legally due are assessed and collected in a manner that is both fair and efficient. This objective is pursued through a framework that seeks to minimise disputes, reduce administrative and compliance costs, and limit uncertainty for both taxpayers and the state [4, 29, 30]. Legal certainty is of particular importance, as it enables taxpayers to

organise their affairs with confidence and supports a stable investment climate. Increasingly, modern tax administrations recognise that the most effective approach to dispute resolution lies in preventing disputes from arising in the first place. Preventive strategies include the issuance of clear and accessible guidance, taxpayer education initiatives, advance rulings on complex transactions, and cooperative compliance arrangements that encourage open communication between taxpayers and tax authorities [31].

Notwithstanding these preventive measures, disputes do arise and must be addressed through structured procedures. Typically, tax dispute resolution frameworks are multi-tiered, encompassing administrative review, internal objection mechanisms, and recourse to independent judicial bodies. At the administrative level, taxpayers are afforded the opportunity to challenge assessments through objection procedures under sections 42 and 43 of Act 915, which allow the tax authority to reconsider its decision in light of additional evidence or legal arguments. While this stage raises concerns regarding perceived impartiality, as the review is often conducted within the same institution that issued the original assessment, it serves as an important filter, resolving a significant proportion of disputes without the need for litigation.

In Ghana, where disputes are not resolved at the administrative level, taxpayers may escalate the matter to the Independent Tax Appeals Board (ITAB), which is a quasi-judicial tax adjudicating body, and subsequently to the courts on appeal from the ITAB. A determination by these independent bodies, particularly the judiciary, ensures that tax laws are interpreted and applied consistently. It also contributes to the development of tax jurisprudence, thereby enhancing legal clarity and predictability. However, litigation is often associated with significant costs, procedural complexity, and lengthy timelines, which may deter taxpayers, particularly small and medium-sized enterprises, from pursuing legitimate claims. One of the most persistent challenges within tax dispute resolution systems is delay. Prolonged resolution periods can have adverse consequences for both taxpayers and the state. For taxpayers, unresolved disputes create financial uncertainty, hinder business planning, and may result in the accumulation of interest on disputed amounts. For tax authorities, delays impede revenue collection and increase administrative burdens. These challenges are often exacerbated by resource constraints, administrative inefficiencies, and the volume of cases before courts and tribunals. Addressing delays requires a combination of procedural reforms, capacity building, and the adoption of technology to streamline case management and improve efficiency. The introduction of the Independent Tax Appeals Board (ITAB) may either expedite the dispute resolution process or even make it longer. The legislature may consider amending the Revenue Administration Act, 2016 (Act 915), for appeals against the decision of the ITAB to be lodged at the Court of Appeal instead of the High Court to prevent further delays in the dispute resolution process.

Another significant issue is the complexity of dispute resolution procedures. Tax laws are inherently technical, and dispute processes often involve intricate legal and procedural requirements. This complexity can make it difficult for taxpayers, particularly individuals and small businesses, to navigate the system without professional assistance [32]. As a result, access to justice may be compromised, and compliance costs may increase. Simplifying procedures, enhancing taxpayer education, and providing clear guidance are essential steps towards making dispute resolution more accessible and equitable [4, 32].

The issue of institutional independence at the administrative stage also merits careful consideration. The perception that objections are reviewed by the same authority that made the initial assessment may undermine confidence in the fairness of the process. Even where internal review mechanisms operate with integrity, the absence of structural independence can create doubts about impartiality. In an effort to reduce bias and impartiality, the Ghana Revenue Authority has within it a technical committee that assists the Commissioner-General in determining tax objections. Strengthening safeguards, such as establishing independent review units or enhancing transparency in decision-making, can help address these concerns and reinforce trust in the system.

Strict statutory timelines for filing objections and appeals present an additional area of concern. While such timelines are necessary to ensure efficiency and finality, they may operate rigidly in practice, leading to situations where taxpayers lose their right to challenge an assessment due to procedural non-compliance [33-35]. This can result in substantive injustice, particularly where the underlying assessment is erroneous. A balanced approach is required, one that maintains procedural discipline while allowing for reasonable flexibility in exceptional circumstances, as in the case of Ghana, where room is made for a taxpayer to apply for an extension of time within which to object or appeal.

In response to these challenges, there has been a growing international trend towards the adoption of Alternative Dispute Resolution (ADR) mechanisms in tax matters. Mediation, arbitration, and other ADR techniques offer the potential for faster, less adversarial, and more cost-effective resolution of disputes. Jurisdictions such as the United States, the United Kingdom, Japan, and several European countries have successfully integrated ADR into their tax systems, demonstrating that such mechanisms can complement traditional processes without undermining the authority of the state.

However, the adoption of ADR in tax disputes remains a subject of debate in Ghana. The traditional view, reflected in section 1(a) of the Alternative Dispute Resolution Act, 2010 (Act 798), is that matters of public interest are excluded from arbitration and similar mechanisms. Taxation, given its central role in financing public expenditure and shaping economic policy, is widely regarded as a matter of public interest. Consequently, it is generally considered unsuitable for resolution through private adjudication. This position underscores the importance of preserving state sovereignty and ensuring that

tax matters are determined within the framework of public law.

Nevertheless, evolving global practices suggest that a more nuanced approach may be warranted. Carefully designed ADR mechanisms, operating within clearly defined legal parameters, have the potential to enhance efficiency and reduce the burden on courts, while still safeguarding public interest considerations. For instance, mediation could be employed at the administrative stage to facilitate negotiated settlements, while arbitration could be limited to specific categories of disputes or subject to oversight mechanisms. Such innovations would need to be carefully calibrated to ensure that they complement, rather than undermine, existing legal frameworks.

From a broader perspective, the effectiveness of tax dispute resolution systems has significant implications for governance, economic stability, and development. Efficient and credible dispute resolution enhances taxpayer confidence, encourages voluntary compliance, and reduces the incidence of tax evasion. It also contributes to a more predictable and transparent business environment, which is essential for attracting investment and promoting economic growth. In the Ghanaian context, where domestic revenue mobilisation is a key policy priority, strengthening dispute resolution mechanisms is critical to ensuring that tax laws are enforced fairly and effectively.

## 6. Conclusion

In conclusion, while Ghana has established a comprehensive legal and institutional framework governing taxation, the analysis reveals that its operational orientation remains predominantly enforcement-driven, with comparatively limited integration of facilitative and trust-based compliance strategies. Tax audits, as a central enforcement tool, play a critical role in detecting non-compliance, deterring evasion, and safeguarding public revenue. However, their effectiveness is inherently constrained when they operate in isolation from broader compliance mechanisms. Compliance is not solely a function of enforcement but is also shaped by behavioural factors, including taxpayer perceptions of fairness, trust in institutions, and the legitimacy of the tax system. Consequently, a narrow reliance on tax audits and sanctions may achieve short-term revenue gains but is unlikely to sustain long-term voluntary compliance.

The analysis of taxpayer rights, privileges, and obligations further highlights the importance of maintaining a balance between the coercive powers of the tax authority and the procedural protections afforded to taxpayers. Judicial developments, particularly the affirmation that tax liability must be determined by law rather than administrative position, reinforce the centrality of the rule of law in tax administration. These safeguards are essential not only for protecting taxpayers but also for enhancing confidence in the system.

Dispute resolution mechanisms emerge as a critical link between enforcement and legitimacy. An effective dispute resolution framework ensures that tax liabilities are determined fairly, provides taxpayers with accessible avenues for redress, and reinforces accountability within the tax administration

system. However, persistent challenges relating to delay, procedural complexity, and perceived lack of independence undermine the effectiveness of these mechanisms and, by extension, the broader compliance framework.

Taken, it is established that effective tax administration in Ghana requires a more balanced and integrated approach that combines enforcement, facilitation, and trust. Strengthening this balance necessitates targeted reforms, including the simplification of tax laws and procedures, the enhancement of taxpayer services and education, the protection and enforcement of taxpayer rights, and the improvement of dispute resolution mechanisms through greater efficiency, accessibility, and transparency.

Ultimately, the sustainability of Ghana's tax system depends on more than its capacity to enforce compliance. It depends on its ability to command legitimacy, foster trust, and sustain a cooperative relationship between the state and taxpayers. A recalibrated approach that integrates these elements will not only enhance revenue mobilisation but also contribute to stronger governance, economic stability, and long-term national development.

## Abbreviations

ADR	Alternative Dispute Resolution
GRA	Ghana Revenue Authority
ITAB	Independent Tax Appeals Board
OECD	Organisation for Economic Co-operation and Development
PAYE	Pay-as-You-Earn
VAT	Value Added Tax

## Author Contributions

**Abdallah Ali-Nakyea:** Conceptualization, Data curation, Formal Analysis, Investigation, Methodology, Supervision, Writing – review & editing

**Wisdom Akpemada Kwame Ankah:** Data curation, Formal Analysis, Investigation, Methodology, Writing – original draft

## Conflicts of Interest

The authors affirm that there are no financial or non-financial conflicts of interest, including any commercial or institutional affiliations, that could have influenced the work reported in this paper.

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