

Artificial Intelligence in Combating Tax Evasion: A Critical Comparative Analysis of the French and British Experiences and Its Applicability to the Algerian Tax Administration

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Received: 15/01/2026 Accepted: 17/05/2026 Published: 19/08/2026

Abstract

Tax evasion remains a significant loss of public revenue in both advanced and developing economies, and more and more tax administrations are using artificial intelligence (AI) in their control functions. This article explores two of the most institutionalized AI-powered fiscal enforcement models worldwide: the French Ciblage de la Fraude et Valorization des Requêtes (CFVR) program and the UK's HM Revenue and Customs (HMRC) Connect system. The study presents a critical comparative analysis of their institutional origins, quantitative performance and legal-ethical constraints, drawing on documentary and secondary sources, before assessing the conditions under which comparable tools could be meaningfully adapted to the Algerian tax administration. The findings show that European systems are based on the progressive integration of several interoperable data sources, including fiscal, cadastral, banking, and (increasingly) social media data, and they produce measurable results (albeit methodologically limited) in terms of revenue recovery. A direct evaluation of Algeria's digital tax architecture, through cross-checking with official sources from the Ministry of Finance and the DGI, finds that while the Jibayatic declaration and payment system has achieved a true national rollout, there is no legal requirement for electronic invoicing and no standardized tax-gap indicator by which the extent of evasion can be monitored, as is the case in France and the UK. The article concludes that a direct transposition of the CFVR and Connect models is neither realistic nor recommendable in the short term and instead promotes a phased, context-sensitive roadmap based on Algeria's existing declarative infrastructure and the introduction of an e-invoicing mandate.

Keywords: artificial intelligence; tax evasion; tax administration; CFVR; HMRC Connect.

1. Introduction

Tax evasion remains one of the most enduring threats to fiscal sovereignty and public revenue mobilization worldwide. As economies become more digitized and financial flows more complex, control methods that rely on manual cross-checks and periodic declarations have produced diminishing returns against increasingly sophisticated evasion schemes (Fellag, 2025). In response, more and more tax administrations have turned to artificial intelligence as a structuring tool to modernize their control functions, enabling the processing of massive data volumes,

predictive risk profiling, and automated detection of anomalous taxpayer behavior (Institut Rousseau, n.d.).

Over the last ten years, France and the United Kingdom, as pioneers of this paradigm shift, have institutionalized AI in fraud detection, each within its own administrative and legal tradition. Since its launch in 2014, France's Direction Générale des Finances Publiques (DGFIP) has steadily expanded its CFVR program, which in recent years has been scaled up to include nationwide aerial-imagery analysis and, since 2024, scraping of social media and digital platform data (Finactuel, 2025). In 2024, algorithmic targeting (Actuia, 2025) represented an increasing and increasingly dominant share of the DGFIP's external audit programming. The UK's HMRC, meanwhile, has been running its data mining platform, Connect, since 2010, using over 22 billion data points to generate leads for around 540,000 targeted inquiries and an estimated GBP 4.6 billion in recovered tax in the 2024/25 fiscal year alone (Financial Accountant UK, 2025; TaxYZ, 2026).

Such experiences pose an urgent question for developing economies such as Algeria, where tax evasion is even more daunting given a large informal sector and the absence of structured transactional data. The Jibayatic system represents genuine progress by Algeria's tax administration in digitizing its declaration and payment functions, completed nationally by the end of 2025 (Algérie Direct, 2025). However, as this article shows, there is no legal obligation to submit electronic invoices, and there is no standardized, officially published tax gap indicator to measure the scale of evasion over time, as is already the case for the tax authorities in France and the United Kingdom.

Central research question

Against this backdrop, the central question guiding this research is the following: how can the artificial intelligence models adopted by advanced tax systems — illustrated here by France's CFVR and the United Kingdom's Connect — inform a more rational and effective anti-evasion strategy in Algeria, and under what institutional, legal, and technical conditions could comparable tools be transposed to the Algerian tax administration?

Sub- questions

This central question unfolds into three sub-questions: (1) What are the operational mechanisms and measurable outcomes of the CFVR and Connect systems? (2) What convergences and divergences characterize the two experiences, and what limitations do they share? (3) What structural gaps currently separate the Algerian tax administration from the preconditions required for AI-based fiscal control?

Research hypotheses

H1. The French and British experiences depend on integrating multiple, interoperable data sources—banking records, property registries, and digital platform data—whose general absence in Algeria constitutes a structural obstacle to directly transposing these models.

H2. The effectiveness of artificial intelligence in curbing tax evasion depends on the degree of digitalization of the economy and the relative weight of the informal sector, both of which distinguish the Algerian context sharply from the French and British ones.

H3. A realistic pathway for Algeria does not lie in replicating foreign technology wholesale, but in a gradual, phased adoption strategy anchored in data already generated domestically—notably the declarative infrastructure Jibayatic now provides nationwide—and in enacting an e-invoicing mandate still absent as of the time of writing.

Significance of the study

This article is important for two reasons. It is one of the first studies on the international-comparative level to undertake a sustained, side-by-side critical comparison of the CFVR and Connect systems specifically, rather than treating each as an isolated national case or doing a survey of multiple systems only briefly, as much of the existing literature reviewed in Section 2 tends to do. At the applied level, the paper also fills a gap in the Algerian scholarship. The existing Algerian literature on AI and tax administration is mostly based on local attitudinal surveys that measure practitioner perceptions, but do not benchmark those perceptions against the concrete operational and data-infrastructure requirements of any particular foreign model. This paper aims to inform academic debate and practical policy planning by providing a structured foreign benchmark and confronting it directly with verified, corrected data on Algeria's actual digital tax infrastructure, including a needed correction to inaccurate international reporting on Algeria's e-invoicing status.

Objectives of the study

The study has four specific objectives: (1) to provide documented, verified quantitative data on the operation and measurable achievements of the CFVR and Connect systems; (2) to identify, through critical comparison, convergences, divergences and shared limitations of these two systems; (3) to establish an accurate, evidence-based account of the current digital tax infrastructure in Algeria that corrects claims, found in international tax-technology tracking sources, that do not reflect the actual state of Algerian e-invoicing policy; and (4) to propose realistic, phased roadmap for AI-assisted tax control in Algeria that is calibrated to the country's present institutional capacity, rather than modelled directly on the French or British experience.

Methodology

This article uses a qualitative research design, with documentary and comparative methods. It is based on secondary and documentary sources: peer-reviewed and technical literature on machine learning applications to tax fraud detection; official publications and parliamentary or oversight reports of DGFIP, HMRC and the UK's National Audit Office; specialised legal, professional and tax-technology commentary; official Algerian government sources, including Ministry of Finance and DGI publications and Algeria's Journal Officiel budget settlement laws; and Algerian academic field studies. Two case studies – France's CFVR and the United Kingdom's Connect – are studied in parallel according to a consistent set of dimensions (institutional origins, quantitative results and legal-ethical framework) before the findings are used as an explicit comparative benchmark against which Algeria's institutional readiness is assessed. When numbers from different sources conflicted or needed verification, this article favors official and primary sources over secondary commercial or journalistic reporting.

The rest of the paper is organized as follows. Section 2 describes the literature review. Section 3 presents the conceptual and theoretical framework. Section 4 presents the French case study and

Section 5 the British case study. Section 6 provides a comparative and critical discussion. Section 7 discusses the Algerian context. Section 8 is finished.

2. Literature Review

2.1 International studies on AI-driven tax enforcement

Fellag (2025) examines the evolution of the French tax authority's targeting tools from a limited data-mining role to a broader fiscal control tool, and traces the shift from spontaneous declaration and manual verification to algorithm-based predictive audit selection. This account forms the descriptive basis for the CFVR case study in this article, but does not extend to comparative analysis with any other national system.

The Institut Rousseau (n.d.) compares France's CFVR program with other European programs, such as Belgium's automatic network modeling to fight VAT fraud and Italy's Redditometro system that compares declared income to observable living standards. The UK's Connect system is explicitly placed within the same European trend, but only in a superficial manner through the treatment of each national case, without an analysis of any one pairing at depth – a gap that this article's two-country comparison seeks to fill.

The CFVR program is presented in the in light of the European Union's AI Act, which raises questions of risk categorization and the adequacy of legal safeguards. As will be shown later in this article, this concern is similar to the British debate over Connect's use of social media data, suggesting that the legal-ethical tensions around AI-based tax enforcement are not specific to a single national system.

2.2 Algerian and Arab studies on AI in tax administration

A descriptive-analytical study that used a questionnaire distributed to local administrative staff in the El Oued tax directorate found a statistically significant impact of AI use on tax management practices (University of El Oued Archives, n.d.). It is limited to internal administrative perceptions and does not refer to any foreign operational model.

A more ambitious contribution was the development of a proposed AI-driven tax model for Algeria, validated using a descriptive-analytical survey of 55 tax experts, most with over 25 years of professional experience. The research provided a very low rating of the effectiveness of the existing tax system (about 2.55 from 5) compared with a much higher rating of the possible contribution of the integration of AI (around 4.12 from 5) and of an intelligent e-invoicing platform (around 4.22 from 5) on a five-point Likert scale (as cited in ResearchGate, 2026). The proposed model is based on an integrated national platform linking the tax directorate to the banks, customs, commercial registry, and land registry services. The model's validation is based solely on experts' perceptions, with no operational precedent.

An academic study from Morocco, reported by Akram (2024) in Hespress, also reached a similar conclusion: AI adoption in tax administration is expected to contribute to fiscal fairness by revealing detailed patterns of taxpayer behavior, but with the caveat that large-scale data collection raises unresolved privacy and data-security questions.

A similar study on the perception of blockchain among accountants in Algeria, methodologically close to ours, based on a random sample of 54 financial accountants and analysed using SPSS, revealed only a moderate to limited level of technical understanding of the

technology, along with cautious opinions about the professional consequences (Ben Moussa & Taybi, 2024) – mirroring a general regional trend of positive attitudes toward emergent digital technologies but uncertain institutional readiness.

2.3 Algerian studies on tax digitalization more broadly

Khier (2023) studies the reform and modernization of tax administration through a case study of the Rouiba tax center. The hypothesis was that the administrative reform has not led to more tax collection despite the measures taken. This result underlines the gap between the formal digitalization and the fiscal impact of the digitalization efforts.

Chaouadi (2023) follows the evolution of electronic administration from a theoretical concept to a practical reality through a case study of Algeria's "Mosahamatek" digital declaration and payment portal. The study notes that the platform mitigates some fiscal risks by notifying taxpayers of amounts due and deadlines, while also acknowledging that broader structural issues like tax evasion and the informal economy are not significantly affected by declarative digitalization alone.

For example, a case study of the regional tax directorate of Chlef traces the trajectory of the modernization programs of Algeria's tax administration, which are aimed at restoring confidence with taxpayers through improved digital services, but also highlights that the pace of reform has not consistently translated into measurable gains in fiscal revenue.

2.4 Research gap and contribution of this article

This review identified two distinct gaps that the current article seeks to fill. First, the international literature on AI-driven tax enforcement rarely offers a systematic, critical comparison of two specific operational systems; existing accounts fall into one of two categories, either detailed descriptions of a single national experience, or broad multi-country surveys that do not offer sustained analysis of any one pairing. Second, and more precisely, none of the Algerian studies identified in this review undertakes a comparative case study of the French CFVR and British Connect systems as an explicit basis for assessing Algeria's institutional preparedness. Instead, existing Algerian scholarship relies primarily on local attitudinal surveys that measure practitioner perceptions of AI potential, rather than comparing these perceptions with the operational, data-infrastructure requirements identified in actual foreign systems. The comparative, documentary approach of this article seeks to supplement, rather than to replace, the existing survey-based tradition by providing the structured foreign benchmark – based on verifiable operational data – that Algerian attitudinal research has hitherto lacked.

3. Conceptual and Theoretical Framework

This section provides the conceptual vocabulary and theoretical grounding for the rest of the article before turning to the French and British case studies. It is a three-step process. First, it differentiates tax evasion from the related but legally separate concept of tax avoidance, a distinction that determines what the artificial intelligence systems examined later are designed to detect. Second, it defines artificial intelligence in the tax administration context, emphasizing its use as a decision-support, not a decision-making, function. Third, it reviews the main families of machine learning techniques applied to tax fraud detection in the technical literature, as the choice

between them has direct implications for what a data-constrained administration such as Algeria can realistically adopt in the short run.

3.1 Tax evasion and tax avoidance: a necessary distinction

Tax evasion entails the illegal practices used by individuals and companies to reduce their tax bills, often by deliberately misreporting or concealing income, transactions, or assets from tax authorities. This might include knowingly underreporting income or submitting false financial statements (Encyclopedia, n.d.). More specifically, the technical literature defines tax fraud as the deliberate alteration of information provided on a tax return to reduce a taxpayer's liability, either by underreporting income or overstating deductions (Kasasbeh et al., 2024). Conversely, tax avoidance is the use of lawful means – exemptions, deductions, or permitted cross-border structuring – to reduce tax exposure within the boundaries of the law (Encyclopedia, n.d.). The distinction between these two has long been a core concern in international tax policy. As far back as 1987, the OECD was already studying how avoidance and evasion practices, particularly through tax havens and base-company structures, lead to distinct categories of concern for national tax administrations (OECD, 1987).

The overall gap between evasion, avoidance and other forms of non-compliance is often estimated through the concept of the tax gap: the difference between the amount of tax that should theoretically be collected and the amount actually paid (Encyclopedia, n.d.). This distinction has direct methodological weight for the present study. Both the CFVR and Connect systems discussed in this article are explicitly framed by their respective administrations as tools for narrowing this tax gap, and their published results are typically reported in precisely these terms – as amounts of previously uncollected tax recovered through algorithmic targeting.

Tax evasion is also not a marginal or exceptional phenomenon. Cross-country estimates put the cost of tax irregularities to OECD economies at several percentage points of GDP, a scale of loss that explains why increasingly sophisticated detection technologies, including artificial intelligence, have moved from the margins to the center of contemporary tax administration policy.

3.2 Artificial intelligence applied to tax administration

Artificial intelligence in finance generally refers to a set of computational methods—machine learning, data mining, and predictive analytics—used on large, heterogeneous data sets to find patterns or anomalies that would not be seen in manual review. One analytically significant feature that recurs in these systems, and that we see in both the French and British cases examined later in this article, is that AI is generally used as a triage mechanism rather than as a substitute for human judgment. Algorithmic tools sort taxpayers' files by estimated risk level. This allows administrations to focus their limited audit resources on files where a reassessment is most likely. The formal decision to open an audit, however, is still usually made by a human official (Fellag, 2025). This distinction – AI as a decision support tool embedded within a human-supervised process versus AI as an autonomous decision maker – is not a trivial technical detail. It informs how the legal and ethical accountability of each system is organized, and it directly informs the phased, human-governed model this article ultimately proposes for the Algerian context in Section

3.3 Machine learning approaches to tax fraud detection: a technical overview

The technical literature on AI-based tax fraud detection distinguishes two broad families of machine learning approaches. The choice between these has practical implications for what any given tax administration can realistically implement. Supervised learning techniques such as decision-tree models, random forests, rule-based classification, and Bayesian networks learn from previous tax returns labeled as fraudulent or compliant by prior audits to build a classification model. The first use of this approach to detect fiscal fraud was a decision-tree algorithm used to detect tax evasion patterns in Italy. The main limitation of this family of methods is structural rather than technical: in most tax administrations, the amount of reliably labeled historical fraud data available to train such models is very limited, as auditing tax declarations is a slow and costly process, which constrains both the accuracy and the generalisability of supervised approaches (Daniel et al., 2018).

This limitation has resulted in a parallel line of research on unsupervised learning methods that do not utilise pre-labeled fraud examples but rather identify taxpayers with declared behaviour that statistically deviates from expected patterns across the entire population of filings, e.g., this approach has been shown using clustering-based visualisation techniques to identify abnormal taxpayer clusters in an Australian tax authority dataset (Qinghua et al., 2024), and using hybrid outlier-detection. More recent frameworks have shifted to hybrid architectures that combine supervised and unsupervised modules with a behavioural compliance score for each taxpayer, an approach directly tested on tax return data from the Saudi tax authority and developed specifically to overcome the labeled-data bottleneck that constrains purely supervised models (Alsadhan, 2023).

This technical distinction is relevant per se to the applicability question discussed later in this article. As supervised methods require a large historical database of confirmed labeled fraud cases, which in turn assumes that the organization has had years of digitized, systematically archived audit results, administrations that are less mature digitally are structurally better off beginning with unsupervised anomaly detection methods on their existing self-reported data rather than attempting to replicate the more data-intensive supervised architectures underlying mature systems such as CFVR and Connect. This observation resurfaces as a tangible design principle in the phased roadmap recommended for Algeria in Section 7.4.

4. Case Study I: France's CFVR Program

This section follows the development of the CFVR program along three lines: its institutional origin and expansion (4.1), its quantitative performance over time (4.2), and the legal and ethical framework in which it currently operates (4.3).

4.1 Institutional origins and development of CFVR

The DGFIP's use of algorithmic tools to detect fraud did not appear out of nowhere. The system's origins can be traced to 2002, with the launch of the ADONIS file, an early system of automated cross-referencing of individual taxation data that provided the technical basis for later developments (Missive Compliance de Gattegno, n.d.). The CFVR project, Ciblage de la Fraude et Valorization des Requêtes, started its development in 2013 and was officially deployed in 2014 as the DGFIP's central tool for data mining and fraud targeting, and received funding of EUR 5

million from the state's Public Action Transformation Fund in 2017 to bolster its powers of targeting (Actuia, 2025; Assemblée Nationale, 2024).

The amount of data flowing into CFVR has grown dramatically since then. In 2021, the DGFIP created Foncier Innovant, a program that uses image-recognition algorithms on aerial photography to detect undeclared swimming pools and extensions subject to property tax. After a pilot phase in nine départements, the program rolled out nationwide in 2023 (Finactuel, 2025). From 2024 to 2026, the DGFIP added scraping social media platforms and online marketplaces to its toolbox, comparing the income declared by taxpayers with observable signs of lifestyle and spending (Yonan-Mercadier, 2025).

4.2 Quantitative Findings (2018-2024)

The proportion of AI-assisted targeting in total audit programming is steadily growing. It is one of the few elements for which the DGFIP publishes a consistent indicator year after year. As Table 2 shows, the share of external tax audits selected by data-mining increased from 13% in 2018, to 22% in 2019, then to over 32% in 2020, about 44-45% in 2021 and finally to 56% of local external audits and 40% of individual audits in April 2024, with an official objective of 50% in 2027 (Actuia, 2025; Assemblée Nationale, 2024). This trajectory reveals a deliberate administrative choice: the DGFIP has progressively institutionalized algorithmic targeting as the main selection method for its audit programming, rather than experimenting with AI as a pilot project.

Table 2. Evolution of AI-assisted tax control in France (CFVR), selected indicators, 2018-2024

Year	Share of external audits selected via data-mining (CFVR)	Total tax audit recoveries (encaissements)
2018	13%	EUR 7.8 billion
2019	22%	EUR 11.0 billion
2020	~32%	EUR 7.8 billion (COVID-19 impact)
2021	~44-45%	EUR 10.7 billion
2022	Not separately published	EUR 10.6 billion
2023	56% (local external audits) / 33% (individual audits)	EUR 10.6 billion (stagnant for 3 rd consecutive year)
April 2024	40% (individual audits, rising trend)	Not yet published in full at time of writing

Sources: compiled by the author from Actuia (2025); Assemblée Nationale (2024); Fondation IFRAP (2024); Agefi Actifs (2022).

In 2024, the DGFIP's systems were said to process some 1,400 billion data points, with data-mining alone flagging some 300 potentially fraudulent situations that would probably have escaped purely manual review (Assemblée Nationale, 2024).

We must offer a caveat on interpreting these results. AI-supported targeting is a large and growing part of audit selection. Still, the DGFIP's own reporting shows that the specific monetary yield attributable to national data-mining analyses alone – as opposed to the total audit recoveries – was EUR 2.1 billion in 2023 compared to EUR 2 billion in 2022; this narrower figure cannot be

compared directly to the DGFIP's total annual recovery figures, which also include audits selected by traditional means (Assemblée Nationale, 2024). Total tax audit recoveries all methods combined have stagnated at around EUR 10.6 billion for three consecutive years (2021-2023) while notified adjustments and penalties increased by 4-5% over the same period, a divergence that the Fondation IFRAP (2024) attributes in part to the ongoing transition in control methodology, during which the direct collection yield specifically generated by expanding data-mining remains incompletely disentangled from overall performance in official statistics.

4.3 Legal and ethical constraints: the EU AI Act

Such expansion has not gone unchallenged legally. As CFVR is an AI system, as defined by the European Union's AI Act, the question has arisen whether it should be classified as a high-risk system, given its potential impact on the rights of individual taxpayers. The algorithm has always been presented as a tool to support DGFIP decisions: it identifies and prioritizes files to be examined, but the decision to open a formal audit is, by law, an act carried out by a human agent (Finactuel, 2025).

5. Case Study II: The United Kingdom's HMRC Connect System

This section follows the same structure as the French case study: institutional origins and expansion (5.1), quantitative results (5.2), and the legal and institutional constraints shaping the system's current operation (5.3).

5.1 Institutional origins and development of Connect

The HMRC's Connect system was introduced in 2010 at an initial implementation cost of around GBP 45 million and is older than most similar European tools (TaxAssist, 2025). Practitioners developed Connect as a "digital detective". Connect was designed as a data analysis platform that could cross-reference government and third-party data sets to profile taxpayers at higher risk of evasion (TaxAssist, 2025).

Connect is based on a wealth of data integration that has expanded exponentially since its inception. Today, the system harnesses over 22 billion data points from bank and financial records, property transactions, employer payroll data, digital marketplace activity, and social media indicators of lifestyle inconsistent with declared income (TaxYZ, 2026). This ability to match domestic data is further reinforced internationally by the Common Reporting Standard, under which HMRC receives automatic information about offshore accounts and investments from over 100 partner jurisdictions (GGI, n.d.).

5.2 Quantitative Findings (2019-2025)

Connect's tangible impact on revenue recovery has increased considerably since its launch, although the most conclusive and recent data relates to the 2024/25 fiscal year. The leads generated through Connect in the year under review have led to approximately 540,000 targeted inquiries and have resulted in an estimated GBP 4.6 billion being recovered, nearly 10 percent of the total tax gap in the UK for the period (Financial Accountant UK, 2025).

This result is easiest to understand in the context of the wider officially estimated UK tax gap, published each year by HMRC since 2008 and providing one of the few internationally available continuous time series of this kind (TaxWatch UK, 2024). Table 3 shows that the tax gap has increased over the period for which detailed figures are available, both in absolute and relative

terms: from GBP 35.8 billion (4.8% of total liabilities) in 2021–22, to GBP 39.8 billion in 2022–23, and to GBP 46.8 billion (5.3%) in 2023–24 – the highest figure ever recorded in cash terms (Chartered Institute of Taxation, 2025). The largest and growing share of this gap was for small businesses, which rose from 48% in 2019–20 to 60% (GBP 28.0 billion) in 2023–24 (Chartered Institute of Taxation, 2025).

Table 3. Evolution of UK tax gap and HMRC Connect-related indicators, 2019-2025

Period	Total tax gap (GBP)	Tax gap as % of total liabilities	Connect-specific indicators
2019-2020	Not directly comparable (methodology later revised)	-	Small business share of gap: 48%
2021-2022	GBP 35.8 billion	4.8%	-
2022-2023	GBP 39.8 billion	Not separately stated	-
2023-2024	GBP 46.8 billion (highest ever recorded)	5.3%	Small business share of gap: 60% (GBP 28.0 Billion)
2024-2025	Total tax debt: GBP 42.8 billion	-	GBP 4.6 billion recovered via Connect leads; ~540,000 targeted inquiries (~10% of total tax gap)

Sources: compiled by the author from Financial Accountant UK (2025); Chartered Institute of Taxation (2025); National Audit Office (2025).

Regarding the French case, a similar methodological caveat applies: the £4.6 billion allocated to Connect covers leads and inquiries traceable to the system, not HMRC's total compliance yield, which relies on multiple detection channels working simultaneously. However, a cross-party committee in Parliament has suggested that HMRC's own estimate of annual losses to tax evasion – GBP 5.5 billion – may itself be an understatement, citing evidence from a VAT enforcement crackdown in 2021 that yielded far more additional revenue than expected.

5.3 Legal and institutional constraints: privacy and whistleblower incentives

Connect also has a strong whistleblower incentive scheme, under which informants who provide information that leads to the recovery of more than GBP 1.5 million can get a reward of between 15 and 30 percent of the extra tax collected (Tradersunion, 2026). Tax authorities like HMRC collaborate with the Serious Fraud Office, the National Crime Agency and Interpol to combat cross-border evasion networks (TaxYZ, 2026).

This institutional model raises questions that resonate as well as diverge from the French debate examined in section 4.3. Tho the UK is no longer part of the European Union and therefore not directly subject to the EU AI Act, the use of social media data by Connect in a systematic manner to deduce lifestyle indicators has prompted privacy and proportionality concerns akin to those regarding CFVR under the EU AI Act (TaxYZ, 2026).

6. Comparative and Critical Discussion

This section integrates the findings of Sections 4 and 5 in four steps. It juxtaposes the two systems (6.1), analyses their convergences (6.2) and divergences (6.3), and finally discusses the limitations they both share (6.4).

6.1 Side-by-side comparison of CFVR and Connect

Table 4 summarises the two systems across the dimensions discussed in the previous sections: institutional origin, data sources, quantitative performance, and legal-ethical framework.

Table 4. Comparative overview of the CFVR (France) and Connect (UK) systems

Dimension	France - CFVR	United Kingdom - Connect
Launch year	2014 (development from 2013; building on the 2002 ADONIS file)	2010
Administrative model	In-house unit within the DGFIP (Ministry of Finance)	Government-owned platform within HMRC
Core data sources	Internal fiscal records, cadastral/aerial imagery (Foncier Innovant), social media and online platforms (since 2024)	Banking records, property transactions, payroll data, digital marketplaces, social media, CRS data from 100+ jurisdictions
Approximate data scale	1,400 billion data points processed (2024)	Over 222 billion data points
Share of audits selected via AI targeting	Rose from 13% (2018) to 40-56% (2023-24); target 50% by 2024	Not published as a standalone indicator
System-specific recovery figures	EUR 2.1 billion directly attributed to national data-mining (2023)	GBP 4.6 billion recovered via Connect leads (2024/25); 540,000 targeted inquiries
Total administration-wide recoveries	~EUR 10.6 billion (stagnant, 2021-2023)	Total tax gap: GBP 46.8 billion (2023-24), highest ever recorded
Distinctive feature	Foncier Innovant (aerial image recognition for undeclared constructions)	Formalized whistleblower reward scheme (15-30% of tax recovered above GBP 1.5 million)
Legal-ethical framework	Subject to EU AI Act classification debates; mandatory human validation before audit	Data protection and privacy scrutiny over social media monitoring; not bound by the EU AI Act post-Brexit

Sources: compiled by the author from the sources cited in Sections 4 and 5.

6.2 Convergences

The two systems are structurally interestingly similar, although they stem from different legal traditions. Neither is based on a single algorithm working on tax returns alone, but on the collation of multiple, heterogeneous data sources, and both have gradually expanded the scope of that data

- France with its cadastral imagery and, more recently, social media; the UK with its long-standing integration of banking, property and cross-border reporting data. Both administrations also explicitly position AI as a targeting and prioritization tool, rather than an autonomous adjudicator: in each case, a human official retains formal authority over the decision to open an audit (Finactuel, 2025; TaxAssist, 2025). In both countries, official reporting finally separates the yield directly attributable to the AI-driven system from the tax administration's overall recovery figures, a methodological caveat consistently applied in this article in Sections 4.2 and 5.2 to avoid overstating the precise financial contribution of either system.

6.3 Divergences

Yet the two experiences differ importantly. The CFVR in France operates within a centralized civil-law administrative tradition, where the tool still operates entirely within the DGFIP, with a publicly tracked, steadily increasing share of audits selected through data mining. By contrast, the UK's Connect does not publish a comparable standalone targeting-share indicator, but reports its impact primarily through recovered amounts and inquiry counts associated with a specific fiscal year. Institutional incentives also differ between the two systems. The UK has a formalized, financially rewarded whistleblower scheme, which has no direct equivalent in the French model (Tradersunion, 2026). Finally, the two systems now operate under different legal regimes. The CFVR is subject to the classification controversies of the EU AI Act. At the same time, Connect, based in a post-Brexit United Kingdom, is not directly subject to that framework but is subject to domestic data protection and privacy oversight (TaxYZ, 2026).

6.4 Shared limitations

Similar criticism applies to both systems. Data privacy and proportionality concerns are central to the French debate over classifying CFVR under the EU AI Act and to broader debates in the UK about a tax authority monitoring social media activity (TaxYZ, 2026). Another common limitation is algorithmic opacity, as neither administration makes public the full technical details of its detection models, making it hard to assess potential bias (VATcalc, 2024) independently. A second common limitation is measuring impact itself. As discussed in Section 4.2 and Section 5.2, both administrations report numbers that mix system-specific yield with broader compliance totals, making it hard for outside observers to determine the exact marginal contribution of AI compared to standard audit selection methods. The fact that a mandatory human check is required before any audit can be opened in both jurisdictions suggests that, even with continuous technological advancement, AI's institutional role in both countries is currently triage rather than final judgment.

7. Prospects for Application in the Algerian Tax Administration

Having laid out what the French and British systems actually do, and at what documented cost and yield, this section turns to the central applied question of this article: what, precisely, separates the Algerian tax administration from the operational preconditions of CFVR and Connect, and what can be done about it, realistically? The discussion is structured in four steps: the magnitude of what is actually at stake, based on official Algerian revenue data (7.1); the actual state of play of digital tax infrastructure (7.2); a systematic gap analysis benchmarked against the two European cases (7.3); and a phased roadmap calibrated to the current Algerian institutional capacity (7.4).

7.1 The scale of the challenge: official revenue data

Official Algerian budgetary data offer a useful starting point for situating the country's fiscal challenge in a comparative perspective. According to Algeria's Journal Officiel, budget settlement laws, total tax revenue increased from around DZD 2,895 billion in 2008 to DZD 9,017 billion in 2023, and ordinary (non-hydrocarbon) tax revenue — direct taxes, stamp and registration duties, turnover taxes, indirect taxes and customs duties — went up from DZD 958 billion to DZD 3,540 billion over the same period (Journal Officiel, budget settlement laws 2008-2023). Table 5 presents the trajectory for selected years.

Table 5. Evolution of tax revenue in Algeria, selected years (2008-2023)

Year	Ordinary tax revenue (DZD billion)	Hydrocarbon tax revenue (DZD billion)	Total tax revenue (DZD billion)
2008	958.3	1,715.4	2,895.2
2012	1,911.2	1,519.0	3,804.5
2016	2,492.0	1,682.6	5,026.1
2019	2,849.2	2,518.5	6,594.6
2020	2,682.2	1,394.7	5,183.4
2021	2,762.1	1,927.1	5,900.6
2022	2,987.7	3,211.9	7,244.9
2023	3,540.0	3,856.3	9,017.4

Sources: Journal Officiel, settlement laws (lois de règlement budgétaire), 2008-2023, Algeria.

The literature includes independent attempts to estimate the overall extent of tax evasion in Algeria, but with different methodologies and a level of uncertainty that is a hallmark of any indirect estimation of informal economic activity. Instead of referring to a particular aggregate figure, whose provenance could not be fully verified for this article, it is more methodologically sound to observe that Algeria does not yet publish an official, standardized annual tax-gap estimate in the same manner as the HMRC series discussed in Section 5.2 – which in itself constitutes a first-order institutional gap vis-à-vis the British case, regardless of any specific estimate of evasion.

7.2 Digital tax infrastructure: the Jibayatic system and the status of e-invoicing

The DGI of Algeria has progressively modernized its administrative tools through Jibayatic, the official integrated electronic declaration and remote-payment system, first deployed at the Bab Ezzouar tax center in Algiers in May 2017 (Ministry of Finance, n.d.). Jibayatic allows taxpayers to submit their declarations, pay their taxes, and monitor their case files online. Using Jibayatic is mandatory for taxpayers attached to the Directorate of Large Enterprises (DGE). The system was gradually rolled out center by center based on the technical readiness of each structure: in December 2023, the deployment reached 16 tax centers, 24 neighbourhood tax centers and some regional and wilaya-level tax directorates (Tadamsa News, 2023), and in September 2025 the DGI announced the entry into service of the system in 14 additional tax centers and many neighbourhood centers in several wilayas (Algérie Direct, 2025). At the end of 2025, the DGI

announced the full generalization of Jibayatic across all tax centers and neighborhood tax centers in the country.

However, it is worth correcting a claim circulating in some international tax-technology tracking sources about electronic invoicing specifically. Algeria is said to be following a phased Continuous Transaction Control (CTC) e-invoicing rollout with a voluntary pilot having begun in 2023 and mandatory phases expected in 2027-2028. But a direct review of the official websites of the Ministry of Finance and the DGI in Algeria shows, as of the time of writing, no enacted legal mandate, no officially confirmed timeline for implementation, and no published phases for the roll-out of e-invoicing. No matter how complete Jibayatic's nationwide coverage of declaration and payment functions becomes, it is focused on those functions, not on transaction-level invoice reporting.

This distinction is of major importance for the applicability analysis developed in Section 7.3. A phased rollout narrative would imply that Algeria is several years into building the structured transactional data foundation that CFVR and Connect both depend on. But the absence of any enacted e-invoicing mandate means that this foundation is not in place yet, even in its nascent, voluntary form. This is a more fundamental gap than a delayed timeline would suggest, and it will persist even after Jibayatic's nationwide rollout is complete.

This gap is not due to a lack of documented interest at the local administrative level. Several field studies, conducted in individual Algerian tax directorates, have directly examined the relationship between digitalization and evasion. A field study carried out in the El Oued tax directorate, surveying 50 employees, examined how digitalization helps improve tax collection and detect evasion more effectively. An exploratory investigation carried out by an independent researcher in the same wilaya, which surveyed 52 tax officials, accountants and academics using SPSS, found that electronic tax administration appears to be effective in fighting evasion and fraud provided it is supported by legislative updates that are in sync with electronic transactions. A similar field study at the Illizi tax center found that digitalization has led to lower collection costs and better service delivery but highlighted persistent implementation difficulties (Merzouka and Dibe, 2025).

7.3 Structural gaps relative to the French and British preconditions

Sections 7.1 and 7.2 identify three gaps when viewed alongside the operational requirements outlined in Sections 4 and 5.

First, the banking sector and the tax administration currently lack integrated interoperability comparable to the data flows underpinning Connect, which draws on more than 22 billion data points, including banking records (TaxYZ, 2026).

Second, as clarified in Section 7.2, e-invoicing has no enacted legal existence in Algeria, whether voluntary or mandatory, as of the time of writing. Jibayatic's completed nationwide rollout is a real and important digitalization achievement. Still, it operates at the level of declarations and payments rather than transaction-level invoicing, meaning the structured transactional data layer both European systems rely on still needs to be built from first principles.

Third, as noted in Section 7.1, Algeria has yet to produce a standardised, officially published tax-gap estimate of the kind underpinning both the French and British reporting discussed in this

article, which constrains the extent to which the effectiveness of any future AI-based intervention could be measured against a consistent national baseline – a methodological gap that existing local-level digitalisation studies, however genuine (Section 7.2), have not been designed to fill, since they operate at the level of individual tax directorates rather than as a national, standardised measurement framework.

A recent Algerian field study surveying tax practitioners helps contextualize how practitioners perceive these structural gaps. The effectiveness of the current tax system was measured on a five-point Likert scale, yielding a moderate score of roughly 2.55 out of 5. The perceived impact of AI integration on the tax system was considerably higher, at around 4.12 out of 5. At the same time, the projected effectiveness of the proposed intelligent e-invoicing platform scored around 4.22 out of 5 (ResearchGate, 2026). This gap between practitioner expectations and current institutional capacity, when read alongside the structural gaps identified above, is not a contradiction: it suggests that the aspiration for AI-based reform is well-founded, and indeed shared across multiple local field studies, but that its realization depends on a national, legally mandated data infrastructure that Jibayatic alone, however completely deployed, does not yet provide.

7.4 A phased and context-sensitive proposal

Rather than copying the French and British models as templates (which the gap analysis in Section 7.3 suggests would be premature), this section proposes a three-stage pathway calibrated explicitly to Algeria's current institutional capacity, based on the technical distinction between supervised and unsupervised machine learning approaches introduced in Section 3.3.

Table 6. Proposed phased roadmap for AI-assisted tax control in Algeria

Horizon	Priority action	Data foundation	Applicable technique
Short term (1-2 years)	Standardize and clean the declarative data now generated nationwide through Jibayatic; formally enact an e-invoicing mandate, starting with large taxpayers.	Jibayatic records (now covering all tax centers)	Unsupervised anomaly detection (no labeled fraud data required)
Medium term (3-5 years)	Link e-invoicing data to VAT reconciliation once the mandate takes legal effect; begin publishing a standardized tax-gap indicator.	Structured e-invoices, once legally mandated	Hybrid supervised/unsupervised models, building a labeled case base over time
Long term (+5 years)	Gradual interoperability with banking and property registries, under an explicit legal framework	Banking records, land registry (subject to data-)	Multi-source targeting comparable in principle to CFVR/Connect, scaled to Algerian data volume

		protection legislation)	
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Sources: developed by the author, informed by the technical distinction discussed in Section 3.3 and corrected institutional baseline established in Section 7.2.

Short term. With Jibayatic now nationwide, the focus shifts from deployment to data quality: standardizing and cleaning the declarative data the system now produces at each tax center and, crucially, formalizing a legal mandate for electronic invoicing, even if initially limited to large taxpayers, given the finding in Section 7.2. Only with a statutory mandate will the structured transactional data that underpins both CFVR and Connect begin to be gathered. At the same time, basic anomaly-detection analytics applied to nationwide Jibayatic data could be implemented without requiring the large historical base of labeled fraud cases that supervised methods presuppose (Daniel et al., 2018).

Medium term. Once an e-invoicing mandate is legally in force, invoicing data should be systematically linked to VAT reconciliation processes, reproducing, on a modest and realistic scale, the cross-referencing logic that underlies both CFVR and Connect. This phase should also include a standardized, publicly reported tax-gap indicator to address the measurement gap identified in Section 7.3. It would begin generating labeled audit outcomes that could gradually support a switch to hybrid supervised/unsupervised architectures, as demonstrated by Alsadhan (2023) in the Saudi context.

Long term. Algeria should consider gradual interoperability with banking and property registries only when these foundations are in place. This must, crucially, be done within an explicit legal and data-protection framework for the use of algorithms in tax administration, which should precede rather than follow this step. Such a framework should deal from the outset with the proportionality and transparency concerns that have already been documented in both the French debate on the classification of CFVR under the EU AI Act (see Section 4.3) and the British debate on Connect's use of social media data (see Section 5.3), rather than letting them emerge reactively after deployment, as happened in both European cases.

8. Conclusion

This article analyzed the possibility and conditions under which the artificial intelligence models developed in the CFVR in France and the Connect system in the United Kingdom could inform Algeria's fight against tax evasion. It did so through a documentary, comparative methodology, examining each European system along a consistent set of dimensions before using the combined findings as an explicit benchmark against which Algeria's institutional readiness was assessed.

Summary of findings

When comparing Sections 4 and 5, CFVR and Connect are rooted in different legal and administrative traditions, but share a common structural logic: they are both based on the progressive aggregation of multiple and heterogeneous data sources (fiscal, cadastral, banking and, increasingly, social-media data) and both have developed, over a period of about a decade, from narrow data-mining functions into central pillars of the audit programming of their respective administrations. Both systems also produce measurable but methodologically

imperfect results: a growing proportion of French audits selected by algorithmic targeting, and several billion pounds recouped each year from Connect-generated leads in the United Kingdom. We also saw in Section 6 that the limitations of both systems are similar – sustained legal and privacy challenges, algorithmic opacity, and a lingering reliance on mandatory human validation before any audit can be formally opened. Therefore, while both systems are technologically sophisticated, AI's role in both countries' institutions remains one of triage, not autonomous adjudication.

Section 7 provides a more cautious picture of the Algerian context. Official Algerian revenue data suggest a fiscal base large enough to justify serious investment in detection capacity, and the completed nationwide roll-out of the Jibayatic declaration and payment system is real progress in digitalization. But a direct check of Algeria's official sources in this article – correcting wrong claims in international tax-tech tracking reports – showed that there is no current legal requirement for e-invoicing and no standardized, publicly reported tax-gap indicator to track the scale of evasion as in France and the UK.

Confirmation of hypotheses

These results support the first two hypotheses formulated in the Introduction. H1 is supported. Both European experiences depend on data infrastructures – interoperable banking, property and structured transactional records – that are largely missing in the current Algerian context, most concretely in the continued absence of any enacted e-invoicing framework. H2 is also supported: the measurable effectiveness of CFVR and Connect seems closely tied to a level of economic digitalization and formalization, including the maturity of structured invoicing data, that Algeria has not yet reached, even after completing the nationwide deployment of its core declarative platform. At the same time, the analysis supports the constructive premise of H3: rather than an unrealistic wholesale transposition of foreign technology, a phased strategy anchored in Algeria's existing digital achievements – a nationally deployed declaration system today, an enacted e-invoicing mandate and a standardized tax-gap measurement tomorrow – offers a more credible path toward AI-assisted fiscal control than any attempt to replicate CFVR or Connect directly.

Limitations of the study

There are limitations to this study. Its sources are exclusively documentary and secondary (official publications, academic literature, specialized tax-technology reporting); it does not involve primary fieldwork among Algerian tax administrators or taxpayers, a gap that mirrors, and could usefully be complemented by, existing Algerian survey-based research discussed in Section 2. Although the comparative case selection deliberately combines two of the most institutionally mature and well-documented European systems, it is limited to two countries and broader patterns across other tax administrations pursuing similar reforms are beyond its scope. Finally, this is a fast-changing policy area, and some of the statistics and institutional positions presented here – in particular the absence of Algeria's e-invoicing legislation, which was found to be the case in this article at the time of writing – could change quickly. The Algerian findings in Section 7 should be seen as a snapshot rather than a permanent judgment.

Directions for future research

Future research would benefit from combining the comparative framework developed here with primary fieldwork within specific Algerian tax directorates, testing the feasibility of the phased roadmap proposed in Section 7.4 against operational realities on the ground – building, in particular, on the local field-study tradition already established at the El Oued and Illizi tax directorates. When Algeria introduces an e-invoicing mandate, a natural next step for this research would be to assess its initial rollout against the specific benchmarks this article derives from the French and British experiences, especially the balance between algorithmic targeting and mandated human oversight. Further comparative work applying the two-country design of this article to other developing economies undertaking similar reforms, several of which were noted in Section 2, might help to ascertain whether the phased, infrastructure-first approach proposed here generalizes beyond the Algerian case.

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