WiltonGroup

Individuals
& the UK Tax System

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INDIVIDUALS AND THE UK TAX SYSTEM

RESIDENCE AND ORDINARY RESIDENCE

Anyone intending to spend time in the UK needs to be aware of the rules governing residence and ordinary residence for UK tax purposes. "Residence" is a fundamental underlying concept of the UK tax system in so far as UK residents are liable to UK income tax on their worldwide income subject to the rules of the remittance basis, and to exemptions, allowances and reliefs. On the other hand, a non-resident is taxable only on profits of trades carried on within the UK and other income from UK-located sources e.g. Land and Property.

Residence

The Statutory Rule

Residence is not defined in legislation but is a concept which is subject to statutory rules which have been extended by case law. Different considerations apply where an individual is coming to the UK as compared with an individual leaving the UK. A UK citizen who has been ordinarily resident in the UK who leaves the UK only for the purposes of "occasional residence" abroad is deemed to continue to be UK-resident for income tax purposes. Dicta from past case law indicates that " occasional residence" may be the opposite of "ordinary residence" and if this is the case then someone leaving the UK may need to become ordinarily resident abroad to throw off resident status.

The legislation stipulates that where someone is present in the UK for temporary purposes only and not with any view or intent of establishing residence he will not be taxed as a resident unless he is present ("actually resident") in the UK (at one time or several times) for six months in the tax year. This is the so called 183 days rule – anyone in the UK for 183 days or more is the tax year is regarded as resident and there are no exceptions to this rule.

It can be deduced from the wording of the legislation that someone who is in the UK with a permanent purpose (i.e. intending to live in the UK long-term) will be regarded as UK-resident from the date of his arrival. Thus, someone entering the UK, coming to the UK to work for two years or more is resident from the day of arrival; a person coming to work for a lesser period or uncertain as to how long he will stay will not be treated as resident unless his visits to the UK exceed six months in a tax year. Since 6 April 1993, any person coming to the UK who acquired property in the UK will not by virtue of that fact alone be treated as UK-resident merely because he sets foot in the UK in that fiscal year. Nevertheless staying in the UK for more than 90 days on average (see below) combined with a UK residence held or owned on a non-temporary lease will normally indicate UK resident status ab initio.

The Extended Scope of "Residence"

- Practice & Case Law

The 183 days rule is not the complete story, because the Courts have taken the view that a person's visits to the UK may be so regular and frequent and of such duration that they indicate residence; furthermore factors such as a person's social and economic links with the UK may be taken into account also. In Levenue v IRC (13 TC486) a former resident of the UK who continued to come to the UK on a regular basis (but without any fixed abode there) was held to be "a bird of passage of almost mechanical regularity" whereas in Zorab v IRC a regular visitor, spending nearly six months in the UK in every tax year, was held to be "a mere traveller". The courts were reluctant to disturb

findings of the Commissioners as to a person's residence status on the grounds such findings were findings of fact rather than law. It did however; give rise to much confusion and lack of precision.

The Revenue have therefore set out their own practice in booklet IR20 and replaced a list of imprecise considerations (such as regularity of visits and social and economic links) with a precise test which seems to derive from the case of CIR v Lysaght (13 TC 511) which related to a taxpayer who had resided in England but went to live in Ireland; however, he remained a director of a UK company, returned on a regular basis for board meetings (usually staying in a hotel) and was present in the UK for 94 days in one year and 101 days in the next year; he retained a bank account in the UK and membership of a club, as will as his directorship. With some reluctance the House of Lords did not feel able to overturn the decision of the Commissioners that he was resident. It has been said that the case "has generally been looked upon as marking the most extreme frontier of residence". Nevertheless, the case seems to be the basis of Revenue practice as set out in booklet IR20 to the effect that a person is regarded as resident in the UK if his presence in the UK amount to 91 days on average over a period of tax years – normally a rolling average of four tax years. If a visitor is present in the UK for 91 days or more on average after four years, then he becomes resident as from the fifth year, unless in the meantime he has indicated an intention that his visits will follow this pattern.

Note:

(1) The Revenue will in applying the so-called "91 days on average" rule ignore presence in the UK caused by circumstances caused beyond the individual's control (serious illness, family bereavements, cancelled flights etc) but this is <u>not</u> true of the statutory 183 days rule.

(2) Days of arrival and departure are in practice ignored, but the statutory position, as set out in the case of Wikie v CIR (32 TC 495) is that part-days may be counted. In that case the taxpayer arrived in the UK on the 2 June 1947 and left on 2 December 1947, 182 days and 20 hours after his arrival; it was held that he was non-resident.

(3) The "91 days on average" rule and the exclusion of days of arrival and departure are purely matter of Revenue practise; it is question of judgement as to whether or not to rely on that practice in giving advice to clients.

The "split year basis" is a further example of Revenue practice. In law a person is in effect resident for the whole tax year in which he is resident for part; the purpose of the split-year basis is to exclude from assessment non-UK incoming arising prior to the date of arrival in the UK. As far as capital gains tax is concerned, capital gains realised prior to the date of arrival are treated as non-taxable but this rule does not apply to an individual who has been non-resident for less than five complete tax years.

Ordinary Residence

The concept of ordinary residence is particularly important as far as capital gains tax is concerned, because the charge extends to persons who are either resident or ordinarily resident in the tax year concerned (subject to the operation of the remittance basis, the split-year basis, exemptions, relief's etc.). It is less significant as far as income tax is concerned, but:

- The anti-avoidance provisions at section 739 et seq. Income and Corporation Taxes Act 1988 (transfer of assets abroad)apply to persons ordinarily resident (not merely resident)

- The benefit of the remittance basis for Schedule D income is given no only to non-domiciled persons but also to Commonwealth or Irish citizens who are not ordinarily resident in the UK. (For certain types of income).

Employees not ordinarily resident (whether or not resident) are taxable in the UK only on emoluments from UK duties (although earnings from non-UK duties can be taxed if remitted by a resident).

The meaning of "ordinary residence" The Revenue's booklet IR20 states that "if you are resident in the UK year after year, you are treated as ordinarily resident here you may be ordinarily resident but not resident for a tax year, if, for example, you usually live in the UK but have gone aboard for a long holiday and do not set foot in the UK during that year…..". The self-assessment tax return indicates that a person who is not resident in the UK is not ordinarily resident also, but the Revenue does emphasise that these guidelines are simplified and are not a statement of law.

A person leaving the UK is normally treated as not ordinarily resident if he has demonstrated a "settled purpose" of living abroad (e.g. permanent emigration or at least the intention to live overseas for at least three years). Similarly, when as individual comes to the UK with no intention of living permanently in the UK he will only be treated as ordinarily resident from 6 April of the fifth year unless a more permanent intention is formulated in the meantime. On the other hand, if someone comes to the UK intending to stay for at least three years ordinarily resident status will crystallise from the start. People who become resident who already have available accommodation or acquire it during the year of arrival are likely to be regarded as ordinarily resident from the beginning. However, if that available accommodation is disposed of within three years it may be that the Revenue will revise their ordinarily resident designation. Any student coming to the UK for a period of study or education for less than four years will not normally be regarded as ordinarily resident unless he acquires property (freehold or long-lease) in the meantime.

The Split Year Basis

When an individual comes to the UK part of the way through a tax year a Revenue Concession provides for then to be treated as resident from the date of their arrival rather than for the whole year. The split year treatment is now available for all individuals intending to stay for at least two years, whether or not for employment (provided that the individual was not previously ordinarily resident in the UK). This concession is extended where, subject to certain conditions, an individual goes abroad under a contract of employment provided that the individual's absence from the UK and the employment itself both cover a complete tax year with interim visits back to the UK being within the prescribed limits.

For capital gains tax purposes, the "split-year basis" concession applies only to individuals coming to live in the UK who have been neither resident nor ordinarily resident at any time in the five preceding years of assessment. The more restricted version of the concession was introduced following the introduction of the five year rule relating to temporary non-residence with effect from 17 March 1998; it applies to individuals returning to the UK after 5 April 1998 within the five year period even if those individuals left the UK prior to 17 March 1998. As far as Capital Gains Tax is concerned the concession does not apply to capital gains on assets relating to a trade etc, carried on in the UK through a branch or agency. It also does not apply to the trustees of a settlement becoming or ceasing residence in the UK or in relation to the settlor of a settlement who becomes chargeable in respect of trust gains under section 77-79 or section 86 TCGA 1992.in consequence of the operation of the split year basis (for income tax purposes):

- Incomers will not pay tax on overseas earnings prior to the date of arrival.

- Interest on certain UK government securities is not taxable is the hands of persons not ordinarily resident in the UK and the "split-year" basis will apply to this interest (even though strictly is has a UK source).

- Broadly speaking, other investment income arising prior to a person's arrival in the UK will not be taxed if it is overseas income.

- It may be advisable to close down overseas interest-yielding bank accounts prior to the date of arrival.

Other Points

- Persons becoming resident in the UK during the tax year are entitled to full personal allowances for that tax year.

- By Concession there is no tax on lump sum retirement benefits form overseas pension schemes or provident funds if the employment was carried out predominantly overseas (this concession can be also apply to UK residents who have worked predominantly abroad such as merchant seaman).

DOMICILE ISSUES

Domicile is a concept of ordinary law and not tax law. It should not be confused with residence or nationality or citizenship.
An individual can live in this country for the best part of his/her life and still he regarded as not domiciled here. An individual can only be domiciled in one country or state at any one time.

The Concept of Domicile

There are three types of domicile:-

- **Domicile of Origin**- which is normally based on the domicile of the father at date of birth which need not be the country of the individual's birth or that of the father. A domicile of origin is retained until a child reaches the age of majority, eighteen, and thereafter establishes a **domicile of choice** by settling in a new country or state. The domicile of a minor will change it that of the farther changes.

- **Domicile of Choice**- is acquired when an individual decides to settle for an unlimited period of time in a new country or state and taken up permanent residence there such that their only or main residence is in that new country or state. In this situation the domicile of origin is given up and replaced by a domicile of choice. It should be pointed our that the onus is on the Inland Revenue to show that an individual has shaken off his/her domicile of origin and important test is whether coming to the UK to live was a purely voluntary act or one which was important test for a change of domicile to be imposed by the Inland Revenue is whether a permanent residence has been established in the UK. If there is an intention to return to the country of domicile of origin of say retirement or when children's education is finished then the Revenue would have difficulty is imposing a change of domicile.

- **Domicile of Dependence**- applies to minor children and certain married women. A woman married before 1 January 1974 automatically took on the domicile of her new husband but this was abolished with effect form 1 January 1974. Women married before 1 January 1974 will have retained their domicile of dependence i.e. that of the husband, unless and until that new domicile is charged by acquiring a domicile of choice by taking up permanent residence elsewhere. A woman married before 1 January 1974 is unlikely to change her domicile of dependency unless she divorces or separates and in this situation she would need to support a claim to be domiciled elsewhere by showing permanent residence there. In the case of divorce minor children take on the domicile of the parent with whom they live and in cases of shared custody they retain the domicile of the father.

Tax Advantages for the non-Domiciliary under current legislation are:-

Foreign income and gains are sheltered from UK tax. It is only when the overseas income and or gains are remitted to the UK that liability to UK tax arises.
Overseas capital can be remitted free of UK tax. If the capital does not contain gains then there can be no capital gains tax liability. This can be a useful way of avoiding tax on income by ensuring that capital and income funds are kept separate so that if remittances are needed then these can be made from capital with no liability to tax provided that the capital does not include gains. Non UK assents are protected from UK wealth tax (i.e. Inheritance Tax) it should be borne in mind that someone who has been tax resident here for 17 out of the pervious 20 years will be deemed domiciled for IHT. UK assets can be protected from UK wealth tax by means of transfers abroad.

Inland Revenue ruling on Domicile

On a client first arriving in this country a domicile ruling should be obtained from the Inland Revenue by completing the relevant section on the form P86. This is a Revenue from mainly applicable to residence but provides the best opportunity for the client to obtain a domicile ruling.

If a ruling has not been obtained on arrival then a form DOM I should be completed and submitted but it is advisable to do so before submission of the tax return for that year as the Revenue will only consider a domicile status when they have received clearance form the applicants tax office that no enquires is intended for the year still within the time limit for the inspector to enquire into an individual's tax return.

The Inland Revenue will again only consider giving a ruling if it is relevant to the individual's tax liability and so you should ensure that the client has an overseas source of income, no matter how small. For example a bank deposit account could be opened in say the Isle of Man and the interest thereon left on deposit and not remitted to the UK.

The annual self-assessment return permits a claim for a domicile ruling but is not considered as effective as submitting a form DOM 1. The return requires the individual to say whether a DOM 1 has been submitted within the previous 6 years and if one has nor then the Revenue are likely to request one.

Overseas income and the Remittance basis of assessment-

It is important to remember that the mail tax advantages for the non-domiciliary are in relation to investment income and capital gains. Specific and more stringent rules apply to overseas business whether operated as partnerships, by the individual as a sole trader or through a company.

Tax planning prior to a client first taking up residence in the UK might include the source-giving rise to the overseas income being closed or terminated in a UK tax year prior to arrival. Remittances can then be made to the UK after arrival here free of tax. Care is needed when advising a client to embark on this course of action and the following pointers should be borne in mind:-

- A bank account is a source of its own and it is wise to close the deposit account and transfer the funds, including and accrued interest to a new account in a different bank in order to demonstrate cessation of the original source.
- With trusts the source of income depends on the type of trust. With a discretionary trust the trust itself is the source whereas with an interest in possession the underlying asset is the source.
- Overseas land and property is treated as one combined source no matter how many properties are owned so that it would be necessary to sell all properties before the rental income can be remitted free of tax.

Domicile and Inheritance Tax – the Deemed Domicile Rule

Under current legislation an individual will be treated as domiciled in the UK purely for inheritance tax if at the relevant time (usually on death or when he/she makes a gift of assets) that person has been resident in the UK for at least seventeen out of the preceding twenty years.

Avoiding the 17/20 year rule needs careful planning as it entails the individual having to break residence for a time.

THE REMITTANCE BASIS

Section 12 Taxation of Chargeable Gains Act 1992 ("foreign assets person with foreign domicile") sets out the remittance rule for non-domiciliaries at Section 12(1) and at section 12(2) defines remittances as follows:

> *For the purpose of this Section there shall be treated as received in the United Kingdom in respect of any gain all amount paid, used or enjoyed or in any manner or form transmitted or brought to the United Kingdom, and Sub-Sections 6 to 9 Section 65 of the Taxes Act….shall apply…..as if the gain were income arising from possessions out of the United Kingdom.*

As such, a gain may be regarded as remitted into the UK if:

(a) It is a remittance under the general meaning of the word as developed in case law, or

(b) It is a 'constructive remittance' within the meaning of Section 65(6)-(9) Income and Corporation Taxes Act 1988, or

(c) It is treated as remittance within the Section 12 definition (all amounts paid, used or enjoyed in or any in any manner or form transmitted abroad to the United Kingdom)

The General Meaning of 'Remittance'

A 'remittance' (in it general meaning) is first and foremost a remittance of money. However, in Thomson v Moyse (39 TC 291 at 335) Lord Ratcliffe indicated that the term could be extended to include sums received from assets imported, the so called 'fur coat trick' whereby a valuable asset (perhaps a car) is imported into the UK and that is not a remittance (under general principals) but only becomes a remittance if the car is sold in the UK. The proceeds become taxable in the tax year when the car is sold [Scottish Provident Institution v Farmer (6 TC 34)].

Tax on the remittance can be avoided by gifting the proceeds to another person. The case of Carter v Sharon (20 TC 229) involved the taxpayer sending her daughter a banker's draft from California. It was accepted that under Californian law the gift was perfected by the time the draft was posted (in California). The gift happened outside the UK and there was no remittance.

Note that a remittance can take the form of a loan [see Harmel v Wright (1974 STC 880)]. The same case establishes that a complicated conduit does not prevent a receipt in the UK being regarded as being identified with the original income or gains realised abroad.

The 'Constructive Remittance' Rules

The constructive remittance rules were introduced to counter some avoidance devices intended to take advantage of the remittance basis, so that the taxpayer could enjoy overseas income etc without technically making a remittance. In particular it was intended to counter the decision in CIR v Gordon (33 TC 226) Mr Gordon was a partner in a film carrying on business in Ceylon. Whilst in the UK he overdrew on his bank account and then arranged for the account to be transferred from London to Ceylon. The account was settled in Ceylon out of overseas income. It was held that there had been no remittance of income from Ceylon. It was accepted in the House of Lords that the income had been received in Ceylon whilst he had received capital in the UK and

had exported the debt (as an alternative to importing monies from overseas income). The intention of subsequent legislation is to ensure that the receipt of cash (in the form of a debt owed by the recipient) in the UK is treated as a remittance even if the debt (including interest) is satisfied abroad. The rules only apply to individuals who are ordinarily resident in the United Kingdom.

The legislation treats as income received in the UK any income applied outside the UK in satisfying.

a. any debt for money lent to him in the United Kingdom or for interest on money so lent, or
b. any debt for money lent to him outside the United Kingdom and received in or brought to the United Kingdom or,
c. any debt incurred for satisfying in whole or in part a debt falling within paragraph (a) or (b).

This seems to thwart borrowing in the UK, shifting the debt abroad and satisfying it out of non-UK income. However, (b) above refers to the loan but not the interest. So consider the following scenario: X is taxed on the remittance basis. He wishes to buy a property in the UK. He takes out abroad an interest only loan (no capital repayments for the time being) to purchase the property and then remits the capital. He satisfies the interest (NB only the interest) abroad out of overseas income.

Mr X's ploy requires segregation of the capital he borrows from the interest thereon.

Any overseas borrowing which is satisfied abroad (presumably by overseas income) before the capital is brought to the UK shall be regarded as so remitted before the debt was satisfied (albeit treated as income for the year of receipt).

Note that the statutory reference is to 'money lent' to the taxpayer, or to interest thereon, which is satisfied by overseas; does over drawing a credit card constitute 'money lent'? (Is giving credit lending money?)

Please note that regard to anyone coming to the UK in order to become resident, a loan taken out before arrival in the UK will escape these rules if it is paid off after leaving the UK later. Legislation deals with a situation where a debt is not repaid by non-UK income but where that income is merely held by the lender to the account of the borrower- that income (or 'property representing it') is treated as a repayment of the capital.

The Extended Rule

for Capital Gains Tax

For income a remittance is determined by reference to its general meaning plus the 'constructive remittance' rules. For capital gains tax there is a further extended definition of remittance which includes any amount used or enjoyed in or in any manner or form transmitted or brought to the United Kingdom…. The definition is very wide and must be taken to include the possibility of a capital gain being remitted in kind although the use of the word 'amount' may well indicate that only pecuniary sums are caught.

Is it The Gain Which Is Remitted?

If an asset cost £10,000 and is sold for £15,000 (abroad) and the taxpayer remits £2,500 what is he remitting? Is it all original capital, or all realised gain, or two thirds former and one third latter? The Revenue take the view that all remittances are primarily remittances of gains (as opposed to original capital). (N.B. capital gains are taxable in and for the year of receipt and would therefore be subject to annual exemption). This view is contentious. Some advisors have suggested that when an asset is sold (e.g. for £15,000) the receipts are segregated into two accounts (1) original capital (£10,000) and (2) gain (£5,000). It is not thought that this would be effective.

Live Off Capital

- Avoid Income Tax

The remittance rules do mean that steps can be taken by or on behalf of non-domiciliaries to avoid income tax. The most well known ploy involves split capital and income bank accounts.

1. Non-domiciled individual Mrs X opens offshore bank account A (being a pure capital account) a separate account B (to receive interest on A and on itself).

2. Mrs X remits only pure capital from Account A; no income tax.

3. But eventually Account A is depleted to nil so Mrs X needs to remit from Account B, but this will crystallise income tax, so….

4. Account B is closed down shortly before 6 April and all funds are transferred to Account C which will act as a new capital account with interest thereon being credited to Account D.

5. After 5 April Mrs X will remit from Account C, she will not be taxed even though these remittances originate from interest on deposits in Accounts A and B (this is because the source, i.e. Accounts A and B, will not exist in the tax year in which the remittance are made).

OFFSHORE STRUCTURES – TRUSTS & COMPANIES

Using Offshore Companies

Shares in an offshore company have a non-UK situs and if disposed of by a non-domiciliary will not be within the scope of CGT unless remitted to the UK. It follows that if a non-UK company can be of use to a non-domiciled shareholder even if the company is regarded as UK-resident by virtue of its central management and control being located in the UK.

However, there may be an income tax downside under the anti-avoidance provisions at Section 739 Income and Corporation taxes Act 1988 having regarded to the fact that Section 742(8) stipulates that:

> *for the purposes of Sections 739 to 741, any body corporate incorporated outside the United Kingdom shall be treated as if it were resident outside the United Kingdom whether it is so resident or not.*

Note that under section 13 capital gains of non-resident close companies can be attributed to UK-resident shareholders (on a 'just and reasonable appointment'). Section 13(10) extends the appointment to non-resident trusts such that any capital gain could be attributed back through to UK-resident settlers. However, Section 13 only applies if an individual, to whom the appointment is made, is domiciled in the UK (at the time the chargeable gain accrues); non-domiciliaries are therefore outside Section 13.

However, if a non-resident company is controlled by a non-domiciled (but UK-resident) shareholder, then it is likely that the Revenue would look to see if the company's central management and control is UK-located in which case the company would become chargeable to UK corporation tax on its income, profits and chargeable gains. Note:

a. The Inland Revenue look to what it regards as the 'reality' of where central management and control is exercised and not necessarily where formal board meeting are held although the Revenue received something of a set back in the Special Commissioners Case of Untelrab v McGregor.
b. The 'central management and control' argument is one reason why ownership of shares in offshore companies by trusts is often preferable to direct ownership by UK-resident individuals (even if non-domiciled).

The Non-Domiciliary and his UK Home

There are various possibilities open to a non-domiciled for owning his own home in the UK.

A. He can own the property indirectly. Ideally he could have borrowed outside the UK and brought the funds in for the purchase. The interest on the borrowings would be satisfied outside the UK out of overseas income (no remittance) albeit not the capital repayments. However, there is Inheritance Tax exposure in the event of unforeseen death (although insurance could deal with the risk). If death is foreseen, then prior to death there could be a transfer to an offshore company owned by an offshore trust (and the possible income tax downside-see below-would be more restricted).

B. To eliminate the Inheritance Tax exposure, the property could be owned by an offshore company in turn (to side step a potential 'management and control' argument) owned by an offshore trust. There is a possibility that the Revenue could maintain that the occupant is a 'deemed director' of the company liable to tax on the occupation benefit under Sections 145/146 ICTA 1988. This is an argument the Revenue has seemingly not entirely given up on.

Using Offshore Companies
to own UK Investment Properties

Offshore companies (owned by offshore trustees) are frequently used by non-domiciled persons to own UK investment properties. In practice this has the effect of limiting UK income tax to basic rate although it would certainly be open to the Revenue to argue for higher rate liability under Section 739 Income and Corporation Taxes Act 1988.

However, if the offshore companies borrow to purchase the property then interest payments may eliminate or substantially reduce taxable profit; such borrowing can be from non-UK lenders.

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