

Lecture Analysis June 2021

PERSONAL TAX

P1256 Personal tax round up (21.38 minutes)

Dean Wootten explains why choosing to defer employer pension contributions could be tax effective for clients and reviews a number of recent personal tax cases including a Supreme Court case that considered whether a discovery can become stale.

P1257 Just and reasonable or not? (10.59 minutes)

Robert Jamieson explains how a recent Upper Tribunal decision concerning taper relief will be relevant to other areas of the CGT code.

P1258 BPR and surplus cash in the company (12.34 minutes)

Mark McLaughlin considers the anti-avoidance rules that restrict the amount of this inheritance tax relief in certain circumstances. He points out where HMRC's current guidance appears to be incorrect.

P1259 Tax avoidance schemes – Joint campaign (15.22 minutes)

Robert Jamieson reminds of the joint campaign being undertaken and more interestingly, discusses an HMRC report that contains intriguing background information about tax avoidance and related schemes.

P1260 Differences between SDLT, LTT and LBTT (12.46 minutes)

Ros Martin explains the main differences between the various stamp taxes that apply to land transactions that take place within the UK.

BUSINESS TAX

B1256 Business tax round up (16.27 minutes)

Dean Wootten takes us through the proposal for the new residential property development tax and reviews a number of recent business tax cases that have been heard by the courts.

B1257 Loan relationships – Convertible bonds (25.20 minutes)

Malcolm Greenbaum returns to loan relationships, this time focussing on convertible debt. Following the advent of various government support schemes linked to COVID-19 that could involve issuing convertible debt this could be common area going forward.

B1258 Substantial shareholding exemption – The M Group Holdings case (10.48 minutes)

Mark McLaughlin looks at a recent First Tier Tribunal case that looks at a hive down of a business to a new subsidiary, prior to the disposal of the subsidiary's shares. The decision is likely to be problematic for many companies.

B1259 Repayment of participator loan – was it artificial (12.56 minutes)

Robert Jamieson takes us through the latest decision that has been made by the GAAR advisory panel.

B1260 VAT on e-commerce goods (20.53 minutes)

Dean Wootten reminds us of the VAT position for e-commerce goods supplied between the UK and EU member states before and after 1 July 2021 when new rules become effective in the EU.