

Lecture Analysis March 2023

PERSONAL TAX

P1361 Personal tax round up (16.29 minutes)

Dean Wootten takes us through personal tax cases looking at gold bullion, class 3 voluntary payments and a redress payment. He concludes with a look at a couple of property related cases.

P1362 Anti-avoidance settlement legislation – (31.52 minutes)

Robert Jamieson reminds us of when and how the settlements provisions apply, and includes a number of useful planning tips as he goes.

P1363 Dividends and the settlements legislation – Clipperton (16.26 minutes)

Robert Jamieson considers the Upper Tribunal's decision in this lead case concerning how trust income received should be taxed on the trusts beneficiaries.

P1364 HMRC clearances (15.15 minutes)

Ros Martin takes us through the various ways in which clearance on certain transactions or arrangements can be sought from HMRC.

P1365 Electronic sales suppression penalties (12.14 minutes)

Phil Berwick covers the penalty regime that exists for those who make, supply or promote an electronic sales suppression tool as well as the penalties for those who use one.

BUSINESS TAX

B1361 Business tax update (19.06 minutes)

Dean Wootten summarises the latest IR35 case where the taxpayer was successful and some VAT cases looking at consultancy services, food bars and a case where COVID was a reasonable excuse for lateness.

B1362 Tax treatment of cryptocurrency (14.41 minutes)

Ros Martin talks about some of the basic issues that can arise when dealing with the tax treatment of cryptocurrency.

B1363 Case study on business asset disposal relief (10.44 minutes)

Robert Jamieson illustrates the Court of Appeal findings in *The Quentin Skinner 2015 Settlements v HMRC (2022)* case through the use of a numerical case study.

B1364 Tax treatment of non-tax advantaged shares – Part 1 (17.55 minutes)

Jeremy Mindell starts by explaining the tax treatment for both tax advantaged and non-tax advantaged share plans before moving on to explain when non-tax advantaged schemes are useful and what to watch out for with employment related securities.

B1365 Tax treatment of non-tax advantaged shares – Part 2 (11.08 minutes)

Jeremy Mindell continues his session by looking at share buy backs and sales, readily convertible assets, internationally mobile employees and reporting requirements.