

*IBC and Patrick Soares present*

## **THE UNMISSABLE CONFERENCE OF 2017**

# **THE NEW DEEMED -DOM RULES, THE NEW UK RESIDENTIAL PROPERTY PROVISIONS, REBASING, CLEANSING, TRUST PROTECTIONS**

Wednesday 25 JANUARY 2017 • Central London

### THE TEAM

**Patrick Soares . Emma Chamberlain . Giles Clarke  
Philip Baker QC and Imran Afzal**

WITH SPECIAL GUEST SPEAKERS

HMRC POLICY ADVISERS SPECIALISING IN THE REFORMS ON FOREIGN DOMS  
**Craig Mason and Antonio Zagara**

9.00 Registration

9.30 **Chairman's Opening Remarks**

Patrick C Soares  
Barrister

**FIELD COURT TAX CHAMBERS**

9.35-10.20 **SESSION1 (45 MINS) HMRC POLICY AND PRACTICE**

**RESIDENTIAL PROPERTY; REBASING AND CLEANSING–HMRC POLICY AND  
PRACTICE**

**Craig Mason**

**DEEMED DOMS TRUST PROTECTIONS –HMRC POLICY AND PRACTICE**

**Antonio Zagara**

**Question and answer session**

10.20-10.40 **SESSION 2 (20 MINS)**

**THE NEW CODE FOR LONG TERM DEEMED DOMS AND RETURNING DOMS WHO HAVE  
A UK DOMICILE OF ORIGIN**

**PCS**

15/20 rule

6 year and 4 year rules

Property left out of the protected settlement

Single Bonds  
Old Gains and Income  
UK medical treatment  
Effect on settlements  
Old gifts  
Essential transfers

10.40-11.05 **SESSION 3 (25 MINS)**  
**Rebasing and cleansing EC**

**New legislation explained**  
**Practical effects**

11.05 – 11.20 **COFFEE BREAK (15 MINS)**

11.20-12.15 **SESSION 4 (55 MINS) - THE IHT SEE-THROUGH OF OVERSEAS COMPANIES WHICH HOLD UK RESIDENTIAL PROPERTY EC**

**Explaining the legislative provisions**  
**Practical examples and scenarios**

12.15-1.00 **SESSION 5 THE ULTIMATE UPDATE ON OFFSHORE TAX MATTERS** 45 minutes  
Philip Baker QC and Imran Afzal

Round-up of recent developments affecting international tax, including recent cases and European developments

1.00 -2.00 **Lunch**

2.00 - 2.45 **SESSION 6 (45 MINS)**

**TRUST PROTECTIONS GC**  
CGT – tainting and protected settlements  
Recycling  
Payments to non-residents;  
Transitional provisions  
Unmatched capital payments

Payments to close family members.  
Income tax – switching off the transferor regime  
Unexpected traps

**2.45 – 3.15 SESSION 7 TEN CASES (30 MINS)– WHAT ADVICE IS GIVEN TO DEEMED DOMS IN TEN ACTUAL SITUATIONS 30 minutes**

**PCS & GC**

Foundation which don't qualify as settlements  
UK income  
Many settlements  
Need for underlying company  
Gift of trust rights  
Exclusion from benefit  
Loans  
Safe settlements – let well alone  
Debts  
DDS settlements

**3.15- 3.50 SESSION 8 (35 MINS)  
SLAYING THE ATED IN VIEW OF THE SEE-THROUGH CHANGES  
GC and PCS**

**TEA 3.50- 4.20 (30 Mins)**

**4.20 – 4.40 SESSION 9 (30 MINS)  
BUSINESS INVESTMENT RELIEF  
GC**

**4.40- 5.15 SESSION 10 (35 mins)  
CURRENT PROBLEMS  
PCS  
Non-residents trading in UK property  
OFFSHORE FAMILY TRUSTS AND THE PROPOSED THIRD PARTY REMUNERATION  
CODE  
SHARE DISCLOSURE REQUIREMENTS  
30% RENT RESTRICTIONS AND NON-RESIDENT LANDLORDS**

UK DIVIDENDS AND S720  
OFFSHORE BUY-BACKS AND S682  
WILLS FOR NON-DOMS AND BRUSSELS IV AND GOLDEN TRUSTS AS WILL  
SUBSTITUTES  
When is a loan not a loan

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