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BUDGET 2018 COVERAGE
PROVIDED BY TOLLEY®GUIDANCE

The tax industry is renowned for its complexity and its speed of change. The annual budget brings a whole new set of rules, which tax practitioners need to grasp swiftly in order to advise clients. The Tolley®Guidance writers have put together their expert analysis and commentary on Budget 2018 to help you understand what the changes mean to you and your clients.

Embracing anything new is always difficult, embracing something you know little or nothing about can feel like you're venturing into darkness alone. Tolley®Guidance will carefully guide you through the specific activities and transactions that are undertaken by tax practitioners.

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> Owner-Managed Businesses
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> IHT, Trusts & Estates
> VAT
> Employment Taxes

Normally Chancellors relish the prospect of delivering a budget – it is an opportunity to make a mark as a great tax reformer and to show off their conjuring skills with announcements to wrong-foot the opposition. But the run up to today's speech felt very different. Expectations were deliberately being dampened down. Was it going to be just a holding exercise, with the 'real' budget to be announced post-Brexit? Indeed, did the Chancellor want to deliver a Budget at all? Some people thought that he wanted to postpone it until the spring, but was trapped by his own decision a couple of years ago to move to an Autumn Budget. So, we were waiting with more than the usual amount of anticipation when he stood up to speak at 3:30.

For a man whose job is widely said to be on the line, his delivery was assured and he had the command of the House of Commons. He threw in several light-hearted comments – I can't imagine many of his predecessors coming up with the line "Fiscal Phil says fiscal rules OK", let alone making a series of increasingly laboured jokes about public lavatories: what would Gladstone have said?! He painted a very positive picture of the public finances, and was able to say that "austerity was coming to an end", not, you will notice, that it has actually ended.

So, what did he say about tax?

The biggest headline will be the proposal for a tax on digital services. It is intended to be restricted to only established tech giants and will be subject to consultation coming into effect in 2020, subject to no new international agreement being introduced before then.

The massive increase in the annual investment allowance to £1m was a big surprise, and comes with a reform of capital allowances to give a measure of relief for some commercial buildings, but at the expense of some of the existing allowances for plant and machinery. The small print of this will be important. Business owners will breathe a sigh of relief that entrepreneur's relief is to remain, although in future it will be necessary to own the business for two years to qualify for relief. That is a reasonable compromise.

Large and medium-sized businesses will also have to get to grips with new rules when they engage workers through personal service companies, but at least these are not going to be introduced until 2020, and there will be a period of consultation – it will be critically important to get the details right.

Home owners will not be faced with capital gains tax on selling their private residences, although there is a tightening up of the rules where property has been let or where there is an overlap between buying one house and selling another.

The major announcement for income tax payers was the bringing forward of the personal allowance and higher rate threshold a year earlier than expected. So, the personal allowance will be £12,500 and the higher rate threshold will be £50,000 from April 2019. Those are substantial changes and will have an impact on almost all taxpayers.

There was more meat in this Budget than we might have expected. As ever though, the detail will be important, and I'll leave the analysis of that to our resident Tolley experts who have worked indefatigably through the evening and night to deliver insight on not only what the statements are, but also what they mean to you and your clients. We are also very fortunate to have a wider team of editors and technicians supporting us and making it all possible. We hope you find the commentary useful and informative.

Andrew Hubbard

Andrew is Editor-in-Chief of New Tolley and Taxation magazine and a consultant at RSM. Andrew initially trained as an inspector of taxes before joining the accountancy profession. He has worked in a 'big four' environment and was a partner in BDO Hayward and then Tenon before joining RSM and LexisNexis. He is also past president of both ATT and CIOT as well as an accomplished musician.

OUR EXPERT WRITERS:

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Lynne is an expert in personal taxation with over 15 years' experience. Lynne joined Tolley from BDO, where she worked in the private client team and the national tax training department, having previously worked for Grant Thornton and Arthur Andersen.

As well as being the in-house writer for the Personal Tax module of TolleyGuidance, Lynne has written for Taxation, Tax Adviser and Taxwise I, and is a tutor for Tolley Exam Training. She is also the current Chairman of the London branch of ATT and CIOT.

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Kelly joined Tolley in 2017, writing on taxes management and personal tax, with a particular interest in pensions and savings. She volunteers for the Low Incomes Tax Reform Group of the CIOT, the CIOT's East Anglia Branch, and for Tax Help for Older People.

Prior to joining Tolley, Kelly worked for 10 years as a member of the technical team of the CIOT's Low Incomes Tax Reform Group. She began her career in tax in private client tax and personal financial planning working for Grant Thornton, finishing her 10 years there as Tax and Trusts Manager.

Budget 2018 - overview for individuals

This is a summary of the most important personal tax changes in Budget 2018. For more on the Budget, see the **Budget 2018 report** and the **Overview of tax legislation and rates 2018** published by HM Treasury and HMRC.

For details of the rates and allowances for 2019/20 and 2020/21, see the **Budget 2018 — personal tax rates and allowances** news item.

The highlights for individuals from Budget 2018 include:

- the changes to the principal private residence rules to reduce the final period of exemption from 18 months to nine months and amend the lettings relief rules
- the delay (or possible abandonment) of the planned changes to the rent-a-room relief rules
- the changes to the definition of a personal company and the minimum qualifying period for entrepreneurs' relief
- the increase of the personal allowance to £12,500 and the higher rate threshold to £50,000, see the **Budget 2018 — personal tax rates and allowances** news item
- that no changes were made to the income tax relief available on pension contributions, despite indications from the Chancellor prior to the Budget that he might be reviewing the rules

Property owners

Principal private residence relief

In a surprise announcement, the following changes are to be made to principal private residence (PPR) relief, also known as only or main residence relief, with effect from 6 April 2020:

- the final period of exemption will be reduced from 18 months to nine months (this will not affect the final period of exemption for those who are disabled or in a care home; that will remain 36 months, see **TCGA 1992, s 225E**)
- the conditions for letting relief will be amended such that relief will only be available where there is shared occupancy (ie the owner and tenant both live in the residence)

Overview of tax legislation and rates 2018, para 2.20

The detail will be subject to consultation. For the existing rules, see the **Principal private residence relief — basic principles** guidance note.

As noted below, it had been expected that the rent-a-room relief conditions would be amended to require shared occupancy, but it appears this has now been dropped in favour of the changes to lettings relief. Possibly this is because it is expected to bring in a greater yield for the Treasury; the rent-a-room relief changes were expected to have a negligible impact, whereas the changes to PPR are expected to bring in £150m by 2023/24.

TIIN: Income tax rent-a-room relief (July 2018); **Budget 2018 report**, page 38 (line 57).

Rent-a-room relief

As mentioned above, it had been expected that the rent-a-room relief conditions would be amended from 6 April 2019 to include a shared occupancy condition; that the individual or a 'member of the individual's household' must use the residence as sleeping accommodation for all or part of the period of the tenancy in order to qualify for rent-a-room relief on the rents. Indeed, draft legislation was published in July 2018 for inclusion in Finance Bill 2019.

However, it was announced at Budget 2018 that this will not now be legislated in Finance Bill 2019. Unlike other provisions, no revised legislative timetable is given. Therefore it would appear that this change has been dropped following the responses to the draft legislation, perhaps in favour of the changes to lettings relief for PPR relief as discussed above.

Overview of tax legislation and rates 2018, para 2.7

As is pointed out in the **Draft Finance Bill 2019 — change to the rent-a-room relief conditions** news item, this should not have had a major impact, as it would have only affected those who let their homes whilst they are on holiday. That news item also discussed the confusion and possible misapplication of the existing rules, and this would appear to be borne out by the Government's suggestion that it will work to ensure the existing rules are better understood.

Budget 2018 report, para 3.10

Non-resident capital gains tax on non-residential properties

From 6 April 2015, the capital gains tax regime was extended to non-UK residents disposing of UK residential property. The rates of tax which apply are 18% and 28% for individuals, trusts and unincorporated persons, and 20% for corporates. The non-resident capital gains tax (NRCGT) regime is now expected to be extended to non-residential property with effect from 6 April 2019 (1 April 2019 for companies), meaning all disposals of interests in UK land by non-residents will be within the scope of the regime.

Overview of tax legislation and rates 2018, para 1.27

The initial draft legislation was published in July 2018 and is discussed in the **Non-resident investors in UK property — a radically altered tax landscape?** news item.

Revised legislation will be published in Finance Bill 2019, which will also encompass how the rules will be applied to collective investment vehicles.

Overview of tax legislation and rates 2018, para 1.27

Note that the compliance regime will be legislated separately, see 'Capital gains tax payment window' below.

Stamp duty land tax — higher rates for additional dwellings

From 1 April 2016, a higher rate of SDLT (effectively, the addition of 3% to the main rate) applies to purchases of:

> additional property by individuals (this also applies where the individual is a part-owner in a residential property and then buys a residential property of his own)

> residential property by companies and trusts other than bare trusts or interest in possession trusts

FA 2003, Sch 4ZA, paras 3–7

See the **SDLT on property acquisitions** guidance note.

Two changes to the rules will be affected from 29 October 2018:

- the taxpayer has 12 months to amend the SDLT return (increased from three months) from the date he sells his previous home – where the individual buys a new home before selling the old one, the higher rate of SDLT is payable but the return can be amended following the sale of the first home in order to reclaim the excess SDLT
- the definition of a 'major interest' in land for these purposes will be amended as HMRC has received representations that it is unclear whether the existing definition includes an undivided share in land

TIIN: SDLT: higher rates for additional dwellings – minor amendments

These changes will be legislated in Finance Bill 2019.

Overview of tax legislation and rates 2018, para 1.48

Stamp duty land tax – first-time buyers of shared ownership properties

A consultation will be published in January 2019 on the proposal to introduce a 1% SDLT surcharge on non-residents purchasing residential property in England and Northern Ireland.

Overview of tax legislation and rates 2018, para 2.45

SDLT does not apply in Scotland (where land and buildings transaction tax applies) or Wales (where land transaction tax applies). However, these jurisdictions often mirror changes to SDLT in their own legislation.

Stamp duty land tax – non-residents

SDLT relief for first-time buyers will be extended to include qualifying shared ownership property purchases, whether or not the purchaser elects to pay SDLT on the market value of the property.

The same SDLT rates will apply as for all other first-time buyers:

PURCHASE PRICE / LEASE PREMIUM OR TRANSFER VALUE	SDLT RATE ON FIRST PROPERTY
Up to £300,000	Zero
£300,001–£500,000	5%
Above £500,000	Normal residential SDLT rates apply, see the **SDLT on property acquisitions** guidance note

Overview of tax legislation and rates 2018, para 1.45

This applies to relevant transactions with an effective date on or after 29 October 2018 and also will be back-dated to 22 November 2017 (presumably the first-time buyer will be able to amend the return to reclaim the SDLT paid). Legislation will be included in Finance Bill 2019.

Overview of tax legislation and rates 2018, para 1.45

Private rental sector tax incentives

It had been announced at Autumn Budget 2017 that there would be a consultation on private rental sector tax incentives in 2018. To date this has yet to be published, and it is not mentioned in Budget 2018.

This sector has suffered a number of tax changes in recent years, with the increases to SDLT, the abolition of wear and tear allowance and the restriction of tax relief on finance costs. This may act as a barrier to entry or mean that some of these costs are passed on to tenants by way of tax rises. Therefore, it is a shame that this review appears to have been dropped.

Business owners

Entrepreneurs' relief — definition of a personal company

In a surprise announcement, further changes will be made to the entrepreneurs' relief rules to be legislated in Finance Bill 2019:

MEASURE	DETAIL	OPERATIVE DATE	REFERENCE
Definition of a personal company	The shareholder must be entitled to a 5% interest in both (a) the company's distributable profits, and (b) the net assets of the company available on winding up	Disposals taking place on or after 29 October 2018	**TIIN: Entrepreneurs' relief: definition of a 'personal company'**
Minimum qualifying period	The minimum qualifying period that applies for entrepreneurs' relief will be extended from one year to two years. This will apply to material disposals of business assets, associated disposals and disposals of trust business assets	Disposals taking place on or after 6 April 2019 (except where the business ceased before 29 October 2018)	**TIIN: Entrepreneurs' relief: minimum qualifying period extension**

For the implications of these changes, see the **Budget 2018 — owner-managed businesses overview** news item.

As expected, Finance Bill 2019 will also include provisions to allow taxpayers to retain a measure of entrepreneurs' relief when the result of issuing shares to other investors is that their own shareholdings fall below 5% (ie it would not be the taxpayer's personal company). These provisions are to apply to share issues that take place on or after 6 April 2019.

The draft legislation published in July 2018 will be slightly revised in Finance Bill 2019 to clarify and improve the computational and qualifying rules.

Overview of tax legislation and rates 2018, para 1.26

For further details based on the draft legislation issued in July 2018, see the **Draft Finance Bill 2019 — changes to the entrepreneurs' relief rules** news item.

Capital allowances

A number of changes were announced to the capital allowances regime:

- the annual investment allowance is to be increased to £1m from 1 January 2019 for two years (up from the current threshold of £200,000)
- the introduction of a new capital allowance, the structures and building allowance (SBA), on qualifying expenditure incurred on or after 29 October 2018 (where the contracts are entered into on or after that date)
- the writing down allowance that applies to assets in the special rate pool will be reduced to 6% from 8% from April 2019
- the enhanced capital allowances and first-year tax credits for environmentally beneficial plant and machinery will end in April 2020
- the first-year allowances for electric vehicle charging points will be extended until April 2023
- the rules regarding the capital allowances available on the alteration of land will be clarified with effect from 29 October 2018

Overview of tax legislation and rates 2018, paras 1.6–1.11

For full details, see the **Budget 2018 — owner-managed businesses overview** news item.

Employee issues

Off-payroll working in the private sector

Following a **consultation** in 2018, it has been announced that the off-payroll working rules that have applied to the public sector since April 2017 will be extended to the private sector. Implementation has been delayed to April 2020 in order to learn lessons from the experience of the public sector.

Overview of tax legislation and rates 2018, para 2.8

The good news is that small organisations will be excluded from the rules, although no definition of 'small' is given in the documentation.

Overview of tax legislation and rates 2018, para 2.8

For full details, see the **Budget 2018 — overview for employers** news item.

Class 1A NIC on termination payments

The plan to charge Class 1A NIC on the excess of termination payments over £30,000 (ie those payments falling within **ITEPA 2003, s 403**) is delayed by one year and now will not be in force until April 2020. For more details of the proposals, see the **Termination payments — overview** guidance note.

Overview of tax legislation and rates 2018, para 2.14

Relief for self-funded training

Following a **consultation** in 2018 on extending the scope of tax relief currently available to employees and the self-employed for work-related training costs (in the case of employees, self-funded training rarely qualifies for tax relief), the Government has decided not to introduce any changes and will maintain the scope of tax relief currently available. This is mainly due to the fact that the consultation responses indicated that tax relief would unlikely be effective in addressing the barriers to learning or incentivising training.

Overview of tax legislation and rates 2018, para 2.12

Expenses of unpaid office-holders

Legislation will be introduced to exempt from income tax and Class 1 NIC expenses paid or reimbursed to unpaid office-holders when incurred because of their voluntary duties, with effect from the date of Royal Assent to Finance Bill 2020. The NIC treatment will be legislated in a National Insurance Contributions Bill. This places the existing concessionary treatment on to a statutory basis.

Overview of tax legislation and rates 2018, para 2.5; **EIM71100**

Investments

EIS knowledge-intensive funds

A **consultation** was published in March 2018 to explore the need for a new knowledge-intensive fund structure within the EIS fund rules (ie an EIS fund that invests primarily in knowledge-intensive companies), which would include a number of new tax incentives. For full details of the proposals, see the **Enterprise investment scheme — introduction** guidance note.

Based on the tax consultation tracker on the **GOV.UK website**, it had been expected that this would be legislated in Finance Bill 2019, but it was confirmed in Budget 2018 that a further consultation will be issued in the summer of 2019 with the aim of including this within Finance Bill 2020.

Overview of tax legislation and rates 2018, para 2.2

Social investment tax relief

It would seem that the take-up of social investment tax relief has been lower than the Government originally expected when the scheme was introduced in July 2014. A call for evidence is expected to be published in early 2019 that may lead to changes to the design and targeting of the relief.

Overview of tax legislation and rates 2018, para 2.1

Pensions

Despite some speculation that pensions tax relief might be changed in the Budget, the only announcement was to increase the lifetime allowance by the standard inflationary amount, which came into effect year-on-year from 6 April 2018. The revised amount is £1,055,000 in 2019/20, increasing from £1,030,000 in 2018/19. See the Lifetime allowance guidance note.

FA 2004, s 218(2A); Overview of tax legislation and rates 2018, para 2.11

The following remain unchanged:

- annual allowance: £40,000
- money purchase annual allowance: £4,000
- income level above which annual allowance is tapered: £150,000

Annex A

See the Annual allowance and Money purchase annual allowance guidance notes.

Individual savings accounts and child trust funds

The ISA subscription limit will remain £20,000 in 2019/20. The limit has been frozen at this level since 2017/18.

Overview of tax legislation and rates 2018, para 2.9

This is the overall ISA limit for an individual, of which up to £4,000 may be saved into a lifetime ISA by individuals who are eligible to open and invest in one (age limits apply). See the Lifetime ISAs and help to buy ISAs guidance note.

SI 1998/1870, reg 4ZA(1A)

The junior ISA and child trust fund subscription limits will increase slightly to £4,368 (the limit was £4,260 in 2018/19).

Overview of tax legislation and rates 2018, para 2.9

In 2019, the Government will launch a consultation on the draft regulations that are necessary to ensure that child trust fund accounts retain their tax-free status following maturity.

Overview of tax legislation and rates 2018, para 2.10

Anti-avoidance

Time limits for offshore assessments

In future, HMRC will have 12 years to raise assessments on offshore matters, even if the taxpayer has made an innocent error. This will catch years back to 2013/14 where the taxpayer has been careless, or 2015/16 where the taxpayer made a mistake despite taking reasonable care.

The Budget 2018 documents confirm that this will be legislated in Finance Bill 2019. However, following responses to the draft legislation published in July 2018, it will be made clear that these extended time limits will not apply if HMRC already has the information to assess the tax due under international agreements.

Overview of tax legislation and rates 2018, para 1.55

For further details based on the draft legislation issued in July 2018, see the Draft Finance Bill 2019 — offshore time limits for assessment news item.

Online platforms — role in tax compliance of users

A call for evidence was published following the Spring Statement 2018 to help the Government determine the measures it could take to ensure that users of online platforms and e-marketplaces meet their tax obligations. The Government wanted to understand the behaviours of the user and the platforms, what tax obligations and opportunities for abuse exist and how these issues have been addressed in other jurisdictions.

The Budget 2018 documents state that when the Government response is published it will include a commitment to providing better guidance for taxpayers earning money through online platforms. It will also "explore how greater use of data can further support sustainable compliance with the tax rules". This suggests that the idea of making the online platforms withhold tax at source (as has been required in other countries) has been abandoned.

Overview of tax legislation and rates 2018, para 2.46

HMRC already has bulk data-gathering powers under which it can require business intermediaries such as online platforms to provide information about users. However, these powers do not apply where the intermediary is based outside the UK, and therefore one of the questions is whether these powers should be widened to ensure that all of the relevant data becomes available to HMRC.

FA 2011, Sch 23

Offshore tax compliance strategy

The Government is to issue a revised offshore tax compliance strategy document, although no timescale is given for publication.

Overview of tax legislation and rates 2018, para 2.50

The publication of the latest strategy is long overdue. Many changes have been introduced relating to offshore tax compliance since the last strategy report was published in 2014, including penalties for offshore transfers, penalties for offshore asset moves, asset-based penalties, criminal sanctions and requirement to correct. HMRC also has access to more information from other countries than ever before, with the adoption of the Common Reporting Standard (CRS).

Whether the new strategy will contain proposals for new penalty regimes is unclear; it would seem sensible to give the provisions listed above time to bed in before proposing further sanctions.

Administration

Capital gains tax payment window

Currently only non-residents disposing of UK residential property are required to file a return reporting the disposal within 30 days of the completion (not exchange). However, the due date for payment of the capital gains tax (if any) due on the disposal is confusing; if the non-resident has been issued with a notice to file a self assessment tax return, he has until the normal due date (ie 31 January after the end of the tax year) to pay the tax, but if not then the tax must be paid within 30 days (ie the same deadline as the return).

TMA 1970, ss 12ZB, 59AA

The Government has long wanted to harmonise the payment deadline to require all non-residents **and** UK residents disposing of UK residential property to pay the tax due within 30 days, first proposing this in Autumn Statement 2015. However, this has been delayed, perhaps in part due to the plan to extend the NRCGT regime to non-residential property.

It is now confirmed that this will be legislated in Finance Bill 2019, and will be phased in:

- from 6 April 2019 – all non-residents who dispose of UK land (whether residential or non-residential) will be required to report the disposal and make a payment of capital gains tax within 30 days of completion. The new legislation will replace the existing NRCGT regime in TMA 1970
- from 6 April 2020 – the same regime will apply to UK residents who make a gain on a disposal of UK residential property

Overview of tax legislation and rates 2018, para 1.28

Following responses to the draft legislation published in July 2018, changes will be incorporated into the Finance Bill 2019 version to:

- allow reasonable estimates of valuations and apportionments where it is not possible to obtain the information by the 30-day deadline
- exclude disposals of non-UK residential properties by UK residents from the rules, and
- remove non-resident companies from the reporting requirement

Overview of tax legislation and rates 2018, para 1.28

This regime is likely to be controversial due to the tight deadline. Already the First-tier Tribunal is hearing NRCGT cases on reasonable excuse for late filing of the return due to ignorance of the law or reliance on a third party. The taxpayer's argument has found favour with some judges, with HMRC being criticised for the lack of publicity given to the changes. See the NRCGT Tax Return late filing penalties – confusion all round news item.

Voluntary tax returns

Legislation will be included in Finance Bill 2019 to treat voluntary tax returns as legally valid.

Overview of tax legislation and rates 2018, para 1.53

This will have retrospective application, back to April 1996 when self assessment was first introduced.

This change presumably results from the decisions in the First-tier Tribunal that a voluntary return was not valid, and as such HMRC has met with difficulty in enforcement matters related to the return (for example, raising an enquiry).

Revell v HMRC [2016] UKFTT 97 (TC); *Patel and another v HMRC* [2018] UKFTT 185 (TC)

Retail gift aid – letters to donors

Changes will be made to the retail gift aid scheme from April 2019 to relax the requirement for charities to issue letters to donors annually where the total donations in the tax year are less than £20. Instead the charity only needs to write to the donor every three years.

Overview of tax legislation and rates 2018, para 2.6

The retail gift aid scheme is where the individual donates items to the charity, which the charity then sells on behalf of the donor. When the item is sold the individual donates the proceeds to the charity so that gift aid can be claimed on that amount, thereby maximising the amount received by the charity and ensuring that the donor receives income tax relief. For more details, see Chapter 3.42 of the **HMRC guidance for charities**.

Whilst this simplifies the administration requirements for charities, it may make it more difficult for taxpayers to obtain the necessary documentation for the purposes of claiming the income tax relief on the self assessment tax return.

Sanctions for late payment and submission

To coincide with the introduction of making tax digital, HMRC was planning to introduce new penalty regimes for late payment of tax and late submission of returns.

Draft legislation was published for inclusion in Finance Bill 2019 on 6 July 2018; however, the Budget documents confirm that this will not now be included in the Bill.

Overview of tax legislation and rates 2018, para 2.54

HMRC information powers

Earlier this year, HMRC launched a consultation on its information powers, as discussed in the **New HMRC information powers – necessary reform or attack on privacy?** news item.

FA 2008, Sch 36

The Budget documents confirm that legislation will not appear in Finance Bill 2019. A consultation response document is to be published in due course.

Overview of tax legislation and rates 2018, para 2.55

Amendments to tax returns

The Government is to issue a call for evidence into how tax returns are amended, with a view to simplifying and modernising the process. No time scale is given for the publication.

Overview of tax legislation and rates 2018, para 2.52

This is not expected to be limited to self assessment tax returns, as the Budget 2018 documents refer to harmonisation of the regimes. However, this just serves to highlight the fragmented nature of the existing administration legislation and the pressing need for a consolidation act.

General anti-abuse rule

Changes will be made to the general anti-abuse rule (GAAR) with effect from Royal Assent to Finance Bill 2019. These are described in the documentation as "minor procedural and technical changes". However, without a tax information and impact note, no further details are available.

Overview of tax legislation and rates 2018, para 2.53

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We've worked with tax practitioners to create a modular service so you can choose the subject areas that are right for your business. Whatever your question, on whatever aspect of tax, you can find guidance, tools and associated information quickly, easily and with an eye on controlling your costs.

CPD / DEVELOPMENT

Passing your tax exams is just a part of your learning. Continuing professional development is important because it ensures you continue to be competent in your profession.

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