TAX EXEMPTIONS FOR MEMBERSHIP ORGANISATIONS

- ARE YOU TAKING ADVANTAGE OF THEM?

5 December 2012

TIM STOVOLD

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As a reminder…

- Top 20 UK full service accounting firm
- Over 60 partners and around 450 staff
- Largest non-national firm of accountants
- Founding member of KS International
- 15 years of Sunday Times “Business Doctor”

…about Kingston Smith

- 4 partners dedicated to trade association sector
- In-house association management team
- Specialist fundraising advisory department
- Regular newsletters and updates

dedicated trade associations team…

Topics for today

- Corporation Tax
- VAT
- Employment Taxes

Autumn Statement

- Pensions
  - Lifetime allowance reduced from £1.5m to £1.25m
  - Annual contribution reduced from £50k to £40k
- Capital Allowances
  - 100% Annual Investment Allowance to increase from £25k to £250k from 1 January 2013
- Corporation Tax
  - Main rate to reduce to 21% in 2014/15
- Income Tax
  - Personal allowance to increase to £9,440 in 2013/14

Corporation Tax

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Corporation Tax
Compliance dates and rates

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- CT payable at 20% to 24% by:
  - Unincorporated Association;
  - Company limited by guarantee;
  - Company limited by shares (rare);
- CT return to be submitted within 12 months of the year end;
- CT to be paid 9 months and one day after year end unless “Large” where payments due quarterly

Corporation Tax - Notification

- Must submit CT return if received notice to do so;
- Must notify HMRC if liable to CT within 12 months of the end the accounting period;
- Some clubs and unincorporated associations do not need to submit returns if CT liability less than £100, provided run exclusively for members but....

Corporation Tax – Not Excluded

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The following still need to submit returns even if CT less than £100:

- Privately owned clubs run for profit;
- Housing Associations or registered social landlords;
- Trade associations
- Thrift funds;
- Holiday clubs;
- Friendly societies; and
- Companies which are subsidiaries of a charity.

Corporation Tax - Expenses

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Not all expenses are tax deductible.

Disallowable items include:

- Business (i.e. non-staff) entertaining
- Accounting Depreciation
- General provisions
- Legal expenses relating to capital transactions

Capital Allowances

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Deducted instead of Accounting Depreciation:

- On plant and machinery:
  - AIA £25,000
  - WDA 18%
  - WDA-Integral features 8%
- Integral features:
  - Electrical systems
  - Cold water systems
  - Space or water heating systems
  - Lifts and escalators
  - External solar shading

Could you be a charity?

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A charity will normally be exempt from corporation tax although the following will be taxable:

- Trading – unless primary purposes or small
- Profits for land development

A membership organisation could be a charity in some circumstances (i.e. The National Trust) which has the advantage of enabling the payer to claim “gift aid” relief

Charity

Must be:

- Established for charitable purposes only
- Be established in the UK, EU, Norway or Iceland
- Be registered with the Charity Commission or similar body (unless no requirement to do so)
- Meet the management conditions (managers are fit and proper persons)

Voluntary Income

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- Could a membership subscription be in the nature of a donation or are you carrying on a trade? (i.e. providing goods and services with a view to a profit)
- Voluntary receipts such as gifts and gratuities will not generally be taxable
- However, unlikely to give the payer a tax deduction

Badges of Trade

- Profit seeking motive
- Number of transactions
- Nature of the asset
- Existence of similar trading transactions or interests
- Changes to the asset
- The way the sale was carried out
- Source of finance (are there any borrowings?)
- Interval of time between sale and purchase
- Method of acquisition

Mutual Trading

Profits on mutual trading are exempt Conditions:

- Trading must be with members
- Surplus can only go back to members
- Must be a reasonable relationship between return and contribution
- Members must exercise control

Expenditure

Partially mutual then need to allocate expenditure:

- Identify income received from trading services and split between mutual and non-mutual sources
- Deduct direct costs of providing these services against each type
- Apportion general admin and other overhead between each type of income on a rational basis
- Net profit from mutual trading – **exempt**
- Net profit from non-mutual trading – **subject to CT**

Trade Associations

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- Trade associations funded by annual subscription are normally considered not to be trading
- Member entitled to a tax deduction for part of the expenditure which would be tax deductible if incurred by them directly
- Administrative difficulty identifying tax deductible elements for members so…

Trade Association Agreements

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In order to allow members to obtain full deduction for membership subscriptions, TA's may enter into an agreement with HMRC to be taxed on subscriptions.

Beware being taxed on other transactions with members that may be mutual trading.

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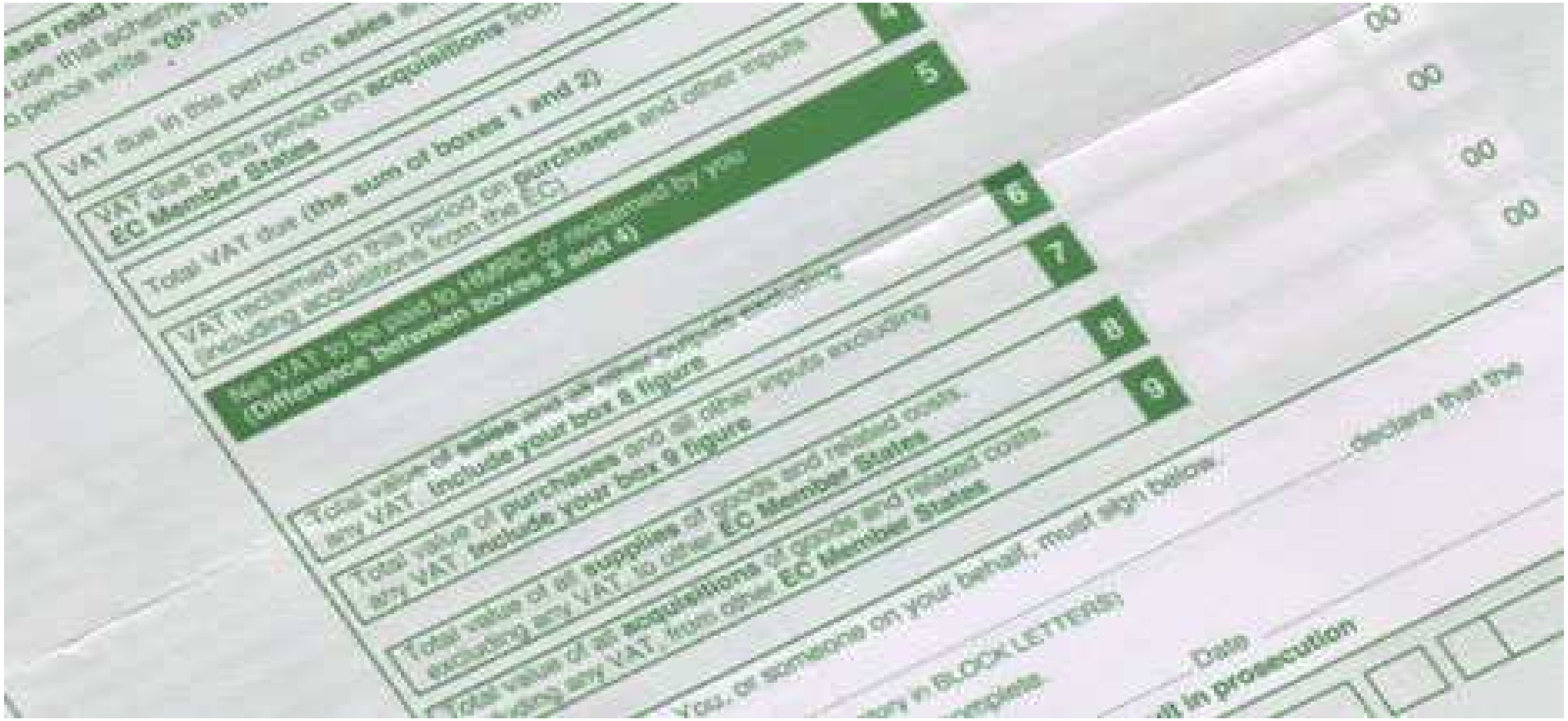
VAT



VAT

- Are you carrying on a business i.e. providing goods or services in return for consideration?
- VAT threshold - £77,000

VAT Returns

- Usually submitted quarterly – every 3 months
  - Have one month and 7 days to submit the return online
  - In some instances returns can be made annually or monthly.

Annual VAT Returns

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- Annual taxable turnover ≤ £1.35million.
- Paying VAT in 9 monthly instalments, each payment 10% of the annual VAT paid the previous year.
- Balance is due with the annual VAT return two months after the year end.

Monthly VAT

Can register to submit monthly VAT returns if you expect to generally receive refunds.

Membership subscriptions and VAT

Membership subscriptions can be treated in different ways for VAT. They can be:

- Exempt
- Non-business (outside the scope of VAT)
- Taxable i.e. subject to standard or zero rat VAT
- A mixture of some or all of the above

The Issue

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"am I making a single supply, or a supply with multiple components"

A single taxable supply

Meaning the overriding principle benefit to the member is either zero-rated (e.g. magazine) or standard-rated.

Advantages:

- VAT incurred in respect of this supply is recoverable (subject to the normal VAT rules)
- Can increase any partial exemption VAT recovery calculation

Disadvantages

- The members may have to incur the VAT charge without a right to recovery

A single exempt supply

This means that the overriding principle benefit to the member is exempt from VAT:

Advantages:

- No VAT is charged to the members

Disadvantages

- VAT incurred in respect of making this supply could be wholly irrecoverable
- Can decrease any partial exemption VAT recovery calculation.

A single outside the scope supply

If the whole of the subscription is an entirely voluntary payment and secures **nothing** or nominal benefits in return, it is outside the scope of VAT.

This means **no** right to VAT recovery in respect of making this supply.

However, if the membership subscription is outside the scope of VAT by virtue of the VAT place of supply rules (i.e. business customer is not in the UK), then VAT may be recoverable if the membership would have been subject to VAT in the UK.

However.............

An extra-statutory concession allows not-for-profit organisations to agree with HMRC an apportionment of the subscription to treat it as a multiple supply of the various benefits, with each benefit carrying its applicable VAT or exempt status.

This may be more beneficial than treating the subscription as a single supply.

However .... (cont)

Each benefit that the member receives will have its own VAT rate and the costs incurred in providing that particular benefit are either recoverable or irrecoverable based on this VAT rate.

An Example:

Membership benefits:

Magazine	Zero rated	£20.00
Website	Standard rated	£10.00 plus VAT
Members Insurance	Exempt	£5.00

Therefore, VAT can only be recovered on the costs in respect of the website and the magazine (subject to normal VAT rules).

A point to note:

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The following non-profit making organisations qualify for exemption from VAT for its members subject if they operate in the public interest:

- Trade Unions
- Professional associations
- Learned societies
- Representational trade associations
- Other public interest bodies, that is, bodies with aims that are in the public domain and are of a political, religious, patriotic, philosophical philanthropic or civic nature
- Organisations that are made up of other qualifying organisations – the supply of membership by umbrella organisations is exempt provided their objects fall within the same heading as their member bodies. Payments covered by the exemption would include affiliation fees or similar levies.

A point to note (cont)

The membership subscription is exempt from VAT, but with certain exclusions that are always standard-rated. The following are excluded from the exemption:

- Any supplies that are not **referable to the aims** of the organisation as set out in its rules, articles of association, constitution etc;

- The **right of admission to any premises, event or performance** (for example a conference) for which non-members have to pay;

- Any supplies that are **not available without payment other than a membership subscription**, that is, which are not provided automatically as part of the membership benefits and for which an additional sum is charged.

VAT – Partial Exempt

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i. Allocate input tax on expenses to VAT supply that they relate to:
   a) standard rated supplies
   b) zero-rated supplies
   c) exempt supplies

ii. Allocate residual input tax either on standard basis or an agreed alternative method if better

VAT – Partial Exemption
Standard method

$$\frac{\text{Value of taxable supplies In the period (excluding VAT)}}{\text{Total value of supplies in the Period (excluding VAT)}} \times 100 = \text{recoverable \% of residual input tax}$$

Partial Exempt – De Minimis

Can claim full input tax (unless blocked) if the exempt input tax is not more than:

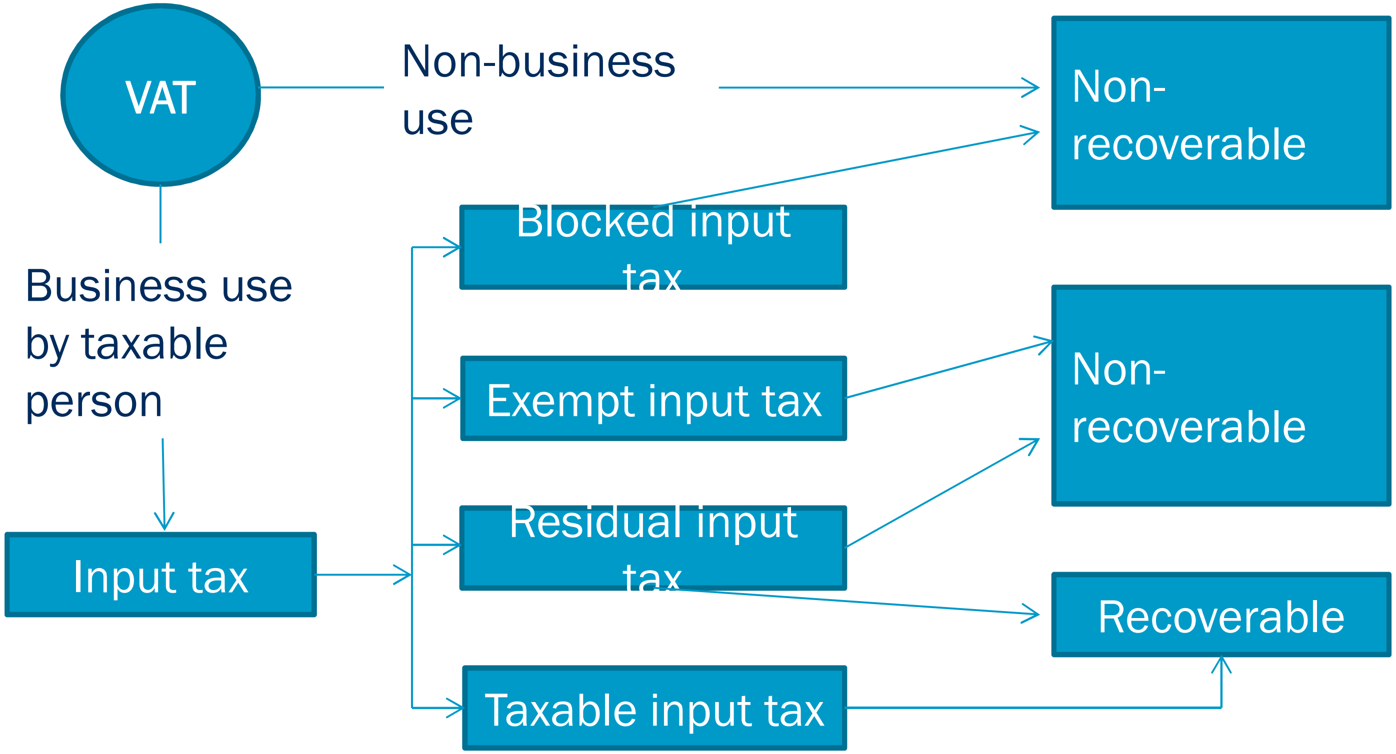
- £625 per month on average; and
- ½ of the total input in the relevant period

Blocked Input Tax

Includes VAT incurred on:

- Business entertainment
- Motor cars other than taxis
- Certain accessories installed in motor cars
- Domestic accommodation for its directors or proprietors
- Supplies used in connection with non-business activity

What input can I recover?



Employment taxes

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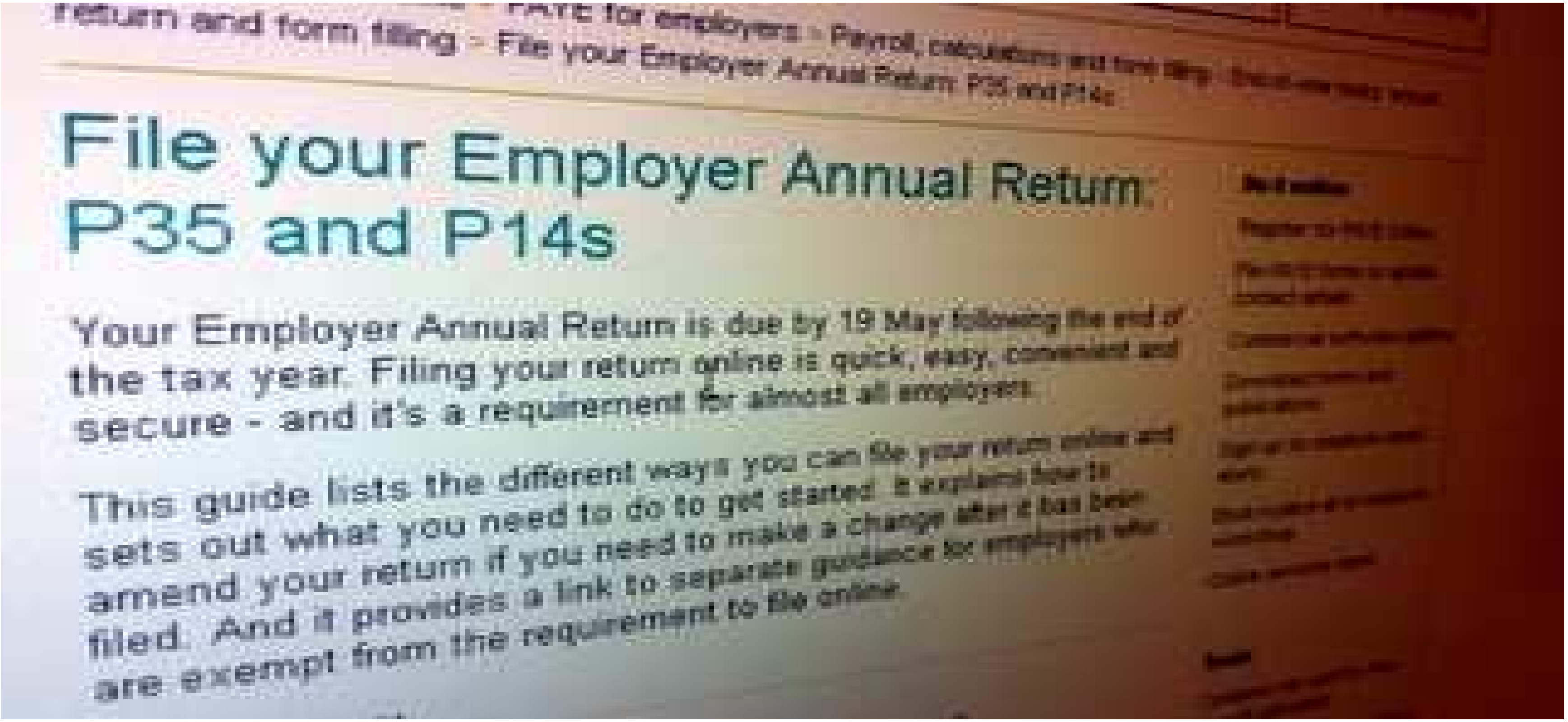

PAYE and NIC

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- Annual returns P35 and P14 to be submitted to HMRC by 19 May following the tax year.
- P60 to be provided to employee
- P11D reporting non-cash benefits to be submitted by 6 July
- Employees Class 1A NIC in respect of P11D benefits to be paid by 22 July (electronically)

Travel Expenses

- Basic rules and definitions:
  - A **temporary workplace** is where an employee performs a task of limited duration (< 24 months or < 40% of their time) or for a temporary purpose (i.e. a director's meeting)
  - A **permanent workplace** is one which is not temporary

Reimbursed Travel Expenses

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Start	Finish	Taxable?
Home	Permanent workplace (i.e. the office)	Yes – Ordinary Commuting
Home	Temporary workplace (i.e. a client)	No – Business Travel
Permanent workplace	Temporary workplace	No – Business Travel
Home	Temporary workplace (via Permanent workplace)	Depends…

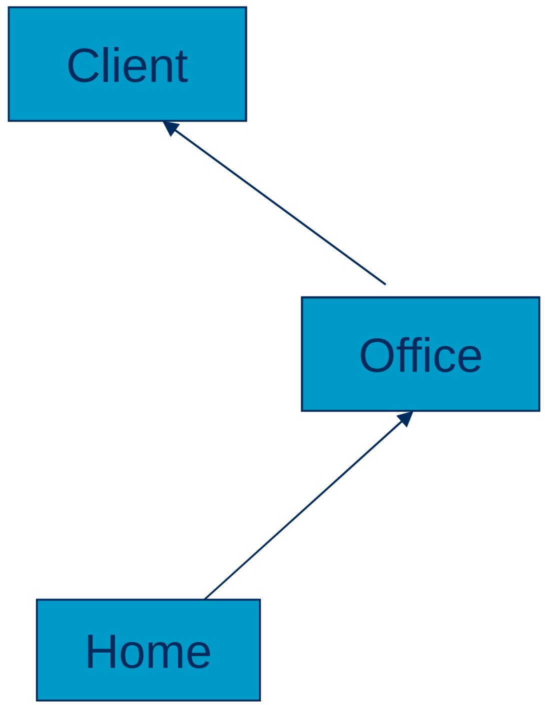
Reimbursed Travel Expenses

<u>Home -> Office</u>

If "substantive" duties performed at office, then ordinary commuting

<u>Office -> Client</u>

Allowable Business Travel and treat Home to Client as single allowable journey if no "substantive" duties performed at office and journey not substantially the same as Ord Commuting (10 miles limit)



Travel Expenses

- Must keep records of purpose of journeys so that you can deal with HMRC during compliance visits
- Make sure sufficient narrative on the expense claim form to show purpose of the journey

Telephones and Broadband

- Pitfalls…
  - Only an employer provided mobile phone is an exempt benefit.
  - If employer reimburses for employee mobile phones then a benefit will arise

Telephones and Broadband

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- Pitfalls…
  - If reimbursing an employee for use of own mobile phone then need to have a policy to determine business vs private use which will depend on type of package employee is on (i.e. free minutes or not)
  - If reimbursing an employee for home phone then line rental will be a taxable benefit unless it is 100% business use

Telephones and Broadband

- Pitfalls…
- Where an employer:
  - pays for internet connection to the employee's home solely for work purposes;
  - under a package where there is no separate billing or record of access calls, and no breakdown is possible between work and private calls
  - HMRC accept that where private use is not significant (and private use does not affect the cost of the package)

the costs of connection are exempt from tax

Telephones and Broadband

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- What happens if the **employer** reimburses **employee** for cost of their own broadband?
  - The law allows for reasonable **additional** household expenses in respect of **homeworking** to be reimbursed tax free
  - So if an employee who begins to work from home under formal homeworking arrangements (i.e. contractual) is already paying for a broadband internet connection at home, there is no additional expense – therefore reimbursements are **taxable**
  - However, if broadband taken as a result of a homeworking arrangement, then can be reimbursed **tax free**

Entertaining and Light Refreshments

- As a general rule, all employee entertainment will result in a taxable benefit arising for the employee
- Main exceptions:
  - Annual Functions
  - Business entertaining
  - Light refreshments
  - Covered by a PAYE Settlement Agreement (see later)

Entertaining and Light Refreshments

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- Business or Staff entertaining
  - What is the purpose of the entertaining?
    - to entertain clients or contacts then whole amount is disallowed in Tax Computation for the business and **no benefit arises**
    - to entertain staff (and if not eligible for any exemption) then whole amount is a **taxable benefit**
    - To entertain staff and some clients/contacts attend then proportion that relates to staff is a **taxable benefit** and proportion that relates to others is disallowed in tax comp

Entertaining and Light Refreshments

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- Light refreshments exemption
  - This means that the "benefit" of being able to drink the coffee from our coffee machines is not taxable on each employee!
  - if **all employees** of the employer concerned may obtain a free or subsidised meal or light refreshments then, provided that the meal/refreshments are of a reasonable scale, there is not taxable benefit arising.
  - There is no requirement that all the employees actually do obtain meals/refreshments. The **opportunity** for all employees, at some time or other, to get a free or subsidised meal is enough to meet the terms of the exemption.

Entertaining and Light Refreshments

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- Attendance of WAGs (or BAHs) at business events (e.g. an awards dinner)?
  - No benefit arises from employee attending as a business expense
  - However, element of cost relating to spouse or partner is a taxable benefit for the employee unless spouse/partner is performing an essential role (i.e. translating foreign languages)

Freelancers/Temps/Casuals

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- High risk area as HMRC are starting to take the position that self-employed individuals do not exist!
- Provided that freelancers have paid their income tax on their tax returns, employer's exposure is for Class 1 Ee's and Er's NI + interest + penalties

Freelancers/Temps/Casuals

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- Main tests for self-employed status:
  - Personal Service
  - Control
  - Mutuality of Obligations

Freelancers/Temps/Casuals

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- Personal Service
  - In an employment contract, an employee must offer his own work and skill
  - Therefore, if a substitute can be used to perform the contract, **it cannot be employment**
  - The right to send a substitute should be unlimited and not unreasonably fettered
  - HMRC do expect this to be contractual and to have happened in practice

Freelancers/Temps/Casuals

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- Control
  - Can the worker be told:
    - What to do?
    - Where to do it?
    - When to do it?
    - How to do it?
- Lots of guidance in HMRC manuals:

http://www.hmrc.gov.uk/manuals/esmmanual/ESM0516.htm

Freelancers/Temps/Casuals

- Mutuality of Obligations
  - In an employer/employee relationship there is a mutual contract to maintain a relationship over a period of time
  - One aspect of “mutuality” in a self-employed contract is that a worker can refuse work and the engaged can decline to offer work

Freelancers/Temps/Casuals

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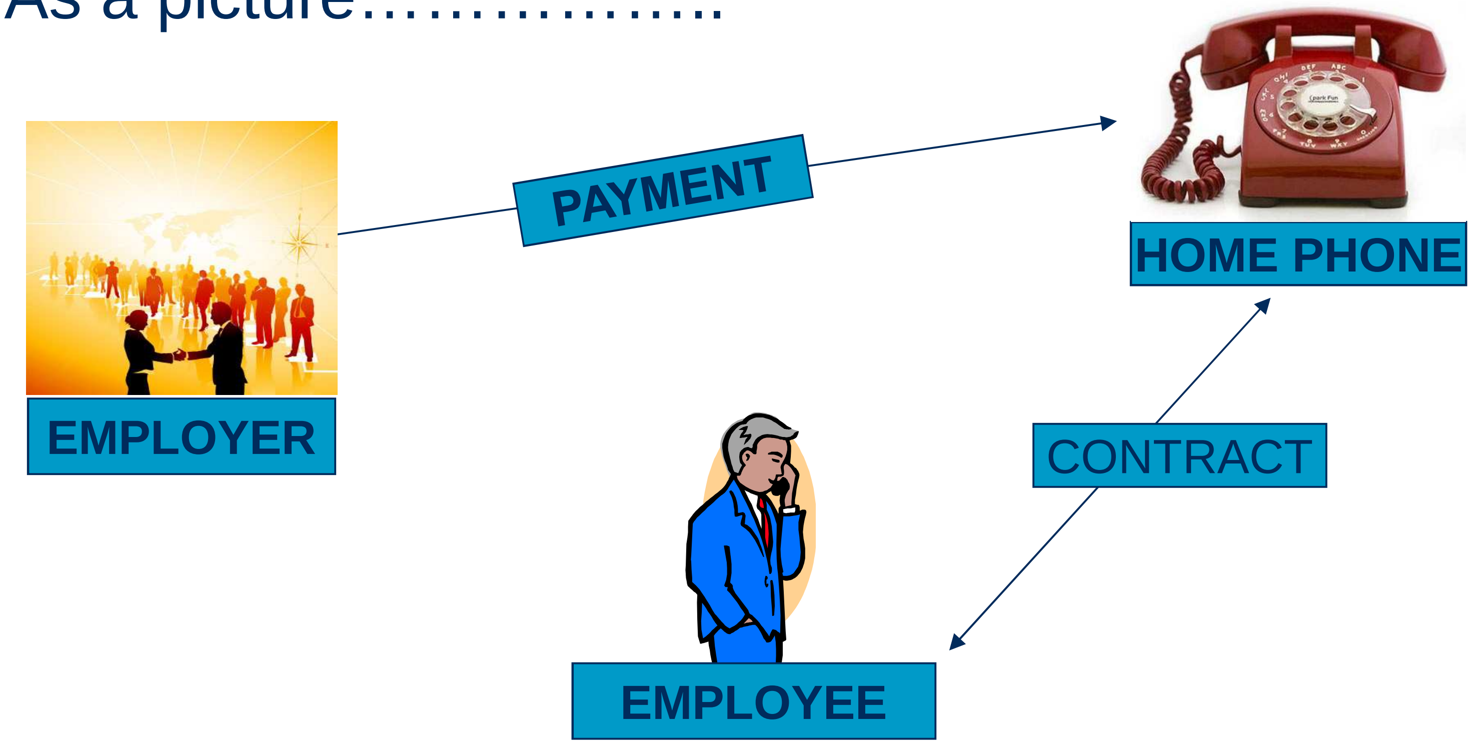
- If you are using freelancers/consultants then be warned of the risk.
- We can offer contract reviews and identify main risks and steps that can be taken to mitigate them

Pecuniary Liabilities!

- As a picture……………..



Pecuniary Liabilities!

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- Tax Treatment…
  - For P11D purposes, enter cost of home telephone in a NON-CLASS 1A NIC box
  - For PAYE purposes, treat as a non-taxable item subject to CLASS 1 Employee's and Employer's NIC
- Problem is – we only find out about these when we do the P11Ds which is after we have submitted P35 so miss out on NIC

Pecuniary Liabilities!

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		Contract in name of...	
		Employee	Employer
Paid by:	Employee (and reimbursed)	Tax: PAYE NIC: PAYE	Tax: P11D NIC: P11D
	Employer	Tax: P11D NIC: PAYE	Tax: P11D NIC: P11D

Dispensations

- These dispense with the need to enter non-taxable items on forms P11D
- A dispensation can be given for expenses or benefits where HMRC is satisfied that no tax would be payable by your employees on expenses paid or benefits provided. Expense claims must be independently vouched and supported by receipts.
- They do not change **taxable** payments into **non-taxable** payments

Dispensations

- Typical items suitable for a dispensation are:
  - Travel & Subsistence
  - Business calls on Home Telephone
  - Business Entertaining
  - Professional fees and subscription
- In the absence of a dispensation, all of the above must be reported on form P11D and a s.336 (or equivalent) claim made by the employee

Dispensations

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- The easiest way to apply is complete an HMRC form P11DX which is a “tick box” application
- This can be downloaded from:

  www.hmrc.gov.uk/forms/p11dx.pdf
- In theory they can be agreed for a tax year up until the due date for P11Ds to be submitted

Dispensations –Subsistence rates

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- It is possible to pay the following amounts without the employee submitting receipts:
- Description Amount (up to)

Description	Amount (up to)
Breakfast rate	£5
One meal (5 hour) rate	£5
Two meal (10 hour) rate	£10
Late evening meal rate	£15

SUBJECT TO CONDITIONS AND RECORD KEEPING!!

Dispensations – new subsistence rates

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- **Breakfast rate** –employee leaves home earlier than usual and before 6.00 am and incurs a cost on breakfast taken away from his home after the qualifying journey has started. If an employee usually leaves before 6.00 am the breakfast rate does not apply.
- **Late evening meal rate** – The rate may be paid where the employee has to work later than usual, finishes work after 8.00 pm having worked his normal day and has to buy a meal before the qualifying journey ends which he would usually have at home.
- The breakfast and late evening meal rates are for use in exceptional circumstances only and are not intended for employees with regular early or late work patterns

Dispensations – new subsistence rates

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One meal (5 hour) rate – The rate may be paid where the employee has been undertaking qualifying travel for a period of at least 5 hours and has incurred the cost of a meal

Two meal (10 hour) rate – The rate may be paid where the employee has been undertaking qualifying travel for a period of at least 10 hours and has incurred the cost of a meal or meals.

PAYE Settlement Agreements

- Where an employer does not want an employee to suffer tax on a benefit (e.g. staff parties), they can enter into a PSA with HMRC to pay the tax on their behalf
- Under a PSA, the tax on the benefit is grossed up and subject to Class 1B Employer's National Insurance

PAYE Settlement Agreements

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- Items suitable for a PSA:
  - **minor** items: such as a small present for an employee in hospital or an employee's use of a pool car where the conditions for tax-exemption don't apply
  - **irregular** items: such as expenses of a spouse occasionally accompanying an employee abroad, or relocation expenses in excess of the £8,000 tax exemption threshold
  - items it's **impracticable** to operate PAYE on or determine a value for P9D or P11D purposes: such as shared benefits (shared cars or taxi journeys, for example) that are difficult to attribute to individual employees

PAYE Settlement Agreements

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- Items not suitable for a PSA:
  - cash payments – including salary, wages, bonus, or other payments such as long service awards
  - large benefits provided regularly to individual employees, such as company cars or beneficial loans
  - round-sum allowances – lump sums provided to an employee to take care of all their expenses in a tax year

PAYE Settlement Agreements

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- Timeline of PSA:
  - Agree with HMRC before 6 July following end of the tax year (but better to do sooner)
  - HMRC like to receive the PSA calculations around the end of August
  - Payment of tax and Class 1B NIC due on 19 October following the end of the tax year

PAYE Settlement Agreements

Description	Amount
(1a) Value of items provided to basic-rate employees (80 x £50)	£4,000.00
(1b) Value of items provided to higher-rate employees (20 x £50)	£1,000.00
(1c) Total value of items provided	£5,000.00
(3a) Grossed-up tax from (2a) = (£4000 x 20%) x 100/(100-20)	£1,000.00
(3b) Grossed-up tax from (2b) = (£1000 x 40%) x 100/(100-40)	£666.67
(3c) **Total tax payable** = (3a) + (3b) £1,666.67	
(4a) Total value plus total tax payable = (1c) + (3c)	£6,666.67
(4b) **Class 1B NICs payable** = 13.8% of (4a)	£920.00
Total due to HMRC = (3c) + (4b)	£2,586.67 (51.7%!!)

Termination

£30,000 tax free

BUT.......................................

Tax Treatment of ingredients of a termination package

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Type of Payment	Taxable?	Subject to National Insurance?
Payment made under terms and conditions of employment such as: -Accrued salary or bonus due -Accrue holiday pay -Contractual, Customary or Discretionary (but in terms and conditions) PILON -Compensation for loss of office provided for in the contract	Yes	Yes
Lump sums to compensate for loss of employment through disability, injury or ill health which prevents employee carrying out duties of employment	No	No

Tax Treatment of ingredients of a termination package

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Type of Payment	Taxable?	Subject to National Insurance?
Payments for redundancy -Due under statutory redundancy payment rules; or -Paid from a non-statutory scheme to compensate for loss of employment **by reason of redundancy**	On amounts over £30,000 only	No
Payments made as damages For example: -You did not give the employee proper notice -You agree, or the Courts or Tribunal rule, that the employee was unfairly dismissed	On amounts over £30,000 only	No

Tax Treatment of ingredients of a termination package

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Type of Payment	Taxable?	Subject to National Insurance?
Write off loan from employer	Yes	Yes
Payments for employee giving a restrictive covenant	Yes	Yes
Employee's Legal costs	Maybe	No

Payment in Lieu of Notice

Wording in Contract	Is a PILON taxable?
"We will give you three months' notice or reserve the right to make you a payment in lieu of that notice period"	**Normally Yes** – as the source of the PILON payment was the contract. It is not an additional redundancy payment **But** – if employer has made a genuine decision not to exercise its rights to pay a PILON and instead pays damages, these could be tax free (up to £30,000) but great care to be taken
"Either party can terminate this contract by giving three months' notice in writing" Contract silent on PILON provisions	**No** – by making a PILON, the employer is breaching the contract and therefore the payment can be considered to be damages and can fall within £30,000 exemption **Unless** – HMRC successfully argue that the making of a PILON was a customary and therefore an implied contract term

Honorariums

These will normally be subject to PAYE and NIC in the normal way.

It is remuneration from the holding of an office.

RTI (Real Time Information)

You will submit an Full Payment Submission every time you make a payment to an employee. The FPS includes:

- the amount you pay the employees;
- Income tax, NICs and other deductions;
- Details of new employees and employees who have left.

RTI

Will no longer need to submit annual returns (Forms P35 and P14).

P45 still needs to be given to leaver but no longer needs to be submitted to HMRC.

RTI
Advantages and Disadvantages

- More frequent updating of tax codes;
- Less underpayment and overpayments;
- Helps support Universal Credit

BUT

High possibility of chaos!

RTI - Preparation

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- Software
- Employee details:
  - Full name
  - Home address
  - Date of birth
  - National Insurance
  - Gender

Pensions – Auto Enrolment

- You need to automatically enrol certain employees into a pension scheme and make a contribution to it;
- Being introduced in stages between 1 October 2012 and 1 February 2018 depending on:
  - number of employees; and
  - the PAYE reference numbers

Full details at:

http://www.thepensionsregulator.gov.uk/employers/staging-date-timeline.aspx

Pensions auto-enrolment

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Number of employees on 5 April 2012	Staging date
160-249	1 April 2014
90-159	1 May 2014
62-89	1 July 2014
61	1 August 2014
60	1 October 2014
59	1 November 2014
58	1 January 2015
54-57	1 March 2015
50-53	1 April 2015
Fewer than 50 employees	Between 1 June 2015 and 1 February 2018

Taxation of controlling persons

- Controlling person – authority or responsibility for directing or controlling major activities of an organisation.
- Will be put on payroll even if paid through a PSC.

Questions ?

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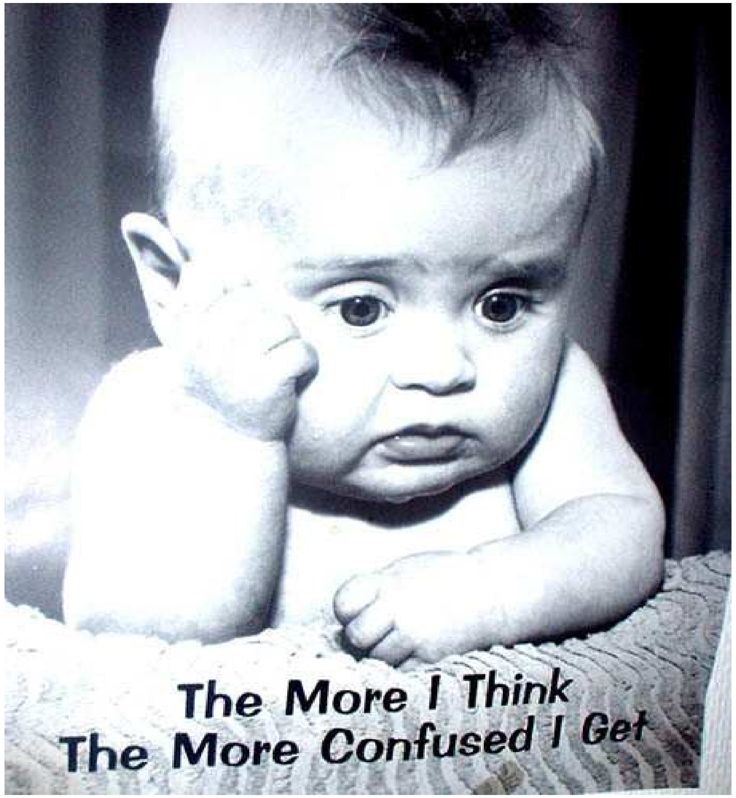

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